



# SYMBIOSIS LAW SCHOOL, HYDERABAD

# 3<sup>RD</sup> ANNUAL TRIAL ADVOCACY COMPETITION, 2025



TRIAL PROPOSITION

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### ANNEXURE I – FIRST INFORMATION REPORT

1. **District:** Ayanavaram **P.S.:** Pallavaram

2. FIR No. 519/2025 Date: 26.05.2025

3. (i) Act: Bharatiya Nyaya Sanhita, 2023; The Arms Act, 1959.

(ii) Sections: §103 of BNS; §25, §27 of The Arms Act.

4. Occurrence of Offence: 2:30 P.M. on 26<sup>th</sup> May, 2025.

5. Information Received at P.S.: 3:00 P.M.

6. **Type of Information:** Oral

7. Place of Occurrence: Filmcity Studios, Hyderabad.

a) Direction & Distance from P.S.: 2.7 km; South-West

b) Address: HDC Junction, Pallavaram – 500032

c) In case outside the limit of this Police Station, then

Name of P.S.: N/A

District: N/A

8. Details of Known/Suspected/Unknown Accused with full particulars:

Known Accused: Teddy Daniels

- 9. Reasons for Delay in reporting by the Complainant / Informant: No delay, informed immediately.
- 10. Inquest Report / U.D. Case No. (if any): Attached Below
- 11. **First Information Contents:** I am Rachika Shekhar, the girlfriend of the deceased. I got a call from Ayushmaan Singh, the director of the film my boyfriend was acting in. He told me that Dev had been shot by Teddy Daniels on the set. Considering their past history, I believe that there must have been some foul play involved, so I am filing this complaint.
- 12. **Action Taken:** An FIR has been registered against Teddy Daniels as a suspected accused person, investigation is handed over to the investigating officer, Krishna S, Sr PI, Pallavaram, Hyderabad.

F.I.R. read over to the Informant, admitted to be correctly recorded and a copy given to the Informant, free of cost.

**Signature/** thumb impression of the complainant/ informant:

Sd/-

Rachika Shekhar

**Signature of officer in charge:** 

Sd/-

Krishna S

Date and Time of dispatch to the Court: 4.00 P.M., 27th May, 2025.



### ANNEXURE II – INQUEST REPORT

1. **District:** Ayanavaram

2. Police Station: Pallavaram

3. Date and Time of receiving information about the death: 26<sup>th</sup> May 2025, 3:00 P.M.

4. Details of the Witnesses:

i. Name: Margaret Shah

Age: 32 years

Address: Flat No. 221, Majestic Apartments, Pallavaram.

ii. Name: Dhwija Kurian

Age: 38 years

Address: Flat No. 522, Majestic Apartments, Pallavaram.

### 5. Details of the Deceased:

i. Name: Dev Kumar

Age: 30 years

Sex: Male

Address: Villa No. 7, The Cascade, Jubilee Hills.

- 6. By whom first found dead: Mr. Ayushmaan Singh
- 7. **Time and place where the body was found:** 26 May 2025, 2:30 P.M., Filmcity Studios, Hyderabad.
- 8. Last person to see the deceased alive: Mr. Ayushmaan Singh
- 9. **Time and place where person was last seen alive:** 2:25 P.M., Filmcity Studios, Hyderabad
- 10. Dead body identified by: Ms Rachika Shekhar
- 11. Marks of identification, if any: Birthmark on the right shoulder
- 12. Height and weight of the deceased: 6'0, 75 kgs.
- 13. Acquaintances present at the inquest: Mr Ayushmaan Singh, Ms. Rachika Shekhar and Mr. Abhilash Gaikwad.
- 14. **Spot where the deceased was found:** Set No. 11, Filmcity Studios, Hyderabad.
- 15. Status of deceased when found: Deceased lying on the ground facing upwards
- 16. **Injuries and marks on the body:** A single gunshot wound to the chest.
- 17. Nature of the wounds: Severe.
- 18. Condition of clothes/ ornaments: Clothes bloodied and slightly torn.
- 19. Marks of violence or struggle: No

- 20. Apparent cause of death: Gunshot wound
- 21. **If any person suspected, who and why:** A1, Mr Teddy Daniels based on reports of various eyewitnesses.
- 22. Present status of the body: Body sent for postmortem at Smile Hospital.

Witness 1- Sd/-

Witness 2- Sd/-

Name of the IO.: Krishna S

Rank: Sr. PI

Sign of the IO.: Sd/-



ANNEXURE III – PANCHNAMA

SCENE OF OFFENCE PANCHNAMA

Date: 26.05.2025

PANCHA No. 01:

Name: Margaret Shah

Age: 32 years

Address: Flat No. 221, Majestic Apartments, Pallavaram.

PANCHA No. 02:

Name: Dhwija Kurian

Age: 38 years

Address: Flat No. 522, Majestic Apartments, Pallavaram.

We, the above-mentioned Panchas, were called by Sr. PI Krishna S, the Investigating Officer, to act as Panchas in the present case on 26<sup>th</sup> May 2025 at about 3:30 PM. We have been working in the studio for the past 4 years. The investigating team with gloved hands and masked mouths searched for evidence in the crime scene. With all the precautions, they collected the phone of the deceased, some pills that were on the person of the accused, a 9 mm Glock 17 pistol and sealed them in a transparent package with I.O marking of the pills as 1A/519/2025, the phone as 1B/519/2025 and of the pistol as IC/519/2025.

Except for the above-mentioned items, no other item/property was seized by the police in our presence. The Panchnama concluded at about 4:30 P.M. on the same day and it was conducted in a peaceful manner. The contents of the Panchnama were read over to us and are correctly recorded.

Pancha No.1- Sd/Name of the IO.: Krishna S

Pancha No. 2-Sd/- Rank: Sr. PI

Sign of the IO.: Sd/-

[5]

### ANNEXURE IV - PROPERTY SEIZURE MEMO

1. District: Ayanavaram P.S.: Pallavaram

2. FIR No.: 519/2025 Date: 26.05.2025

3. Acts and section(s): (a) Act: Bharatiya Nyaya Sanhita (BNS), The Arms Act, 1959

(b) Section(s): 103 of BNS; 25, 27 of the Arms Act

4. Property seized/recovered/ discovered at: Filmcity Studios, Hyderabad.

a) **Date:** 26.05.2025

b) Time: 4:30 P.M.

c) Address of the place from where seized/recovered/discovered: Filmcity Studios, Hyderabad.

## 5. Witness:

i. Name: Margaret Shah

Age: 32 years

Address: Flat No. 221, Majestic Apartments, Pallavaram.

ii. Name: Dhwija Kurian

Age: 38 years

Address: Flat No. 522, Majestic Apartments, Pallavaram.

- 6. Action taken/recommended for disposal of perishable property: N/A
- 7. Action taken/ recommended for keeping of valuable property: Packed, sealed and sent for further investigation.
- 8. Identification required: Yes.
- 9. Details of properties seized/ recovered:

Sl. No.	<b>Property Description</b>	I.O. Marking
1.	Olanzapine Pills	1A/519/2025
2.	Mobile Phone	1B/519/2025
3.	9 mm Glock 17 pistol	1C/519/2025



1B/519/2025

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## 1C/519/2025

Witness 1- Sd/-

Witness 2- Sd/-

Name of the IO: Krishna S

Rank: Sr. IO

Sign of the IO: Sd/-

Advocacy Competi

### ANNEXURE V – POSTMORTEM REPORT

Name of the Institution: SMILE Hospital.

Name of Doctor conducting Autopsy: Dr. Srikanda Raj

Postmortem Report No.: 310/2025

Date and Time of Receipt of Body: 26 May 2025, 5:30 P.M.

Date and hour of starting autopsy: 27 May 2025, 9:00 A.M.

Date and hour of concluding autopsy: 27 May, 1:00 P.M.

**Time of death:** 17 - 19 hours prior to the autopsy.

### **CASE PARTICULARS**

Name of the deceased: Dev Kumar

**Age:** 30

Sex: Male

**Blood Group:** O +ve

Address: Villa No. 7, The Cascade, Jubilee Hills.

Body identified by: Rachika Shekhar, Girlfriend of the Deceased

## **OBSERVATIONS**

Height: 6'0 ft

Weight: 75 kgs

Rigor Mortis: Rigor mortis is present in all four limbs. Post-mortem staining is fixed and

present on the back.

### **EXTERNAL EXAMINATION**

- 1. A single firearm entry wound measuring approximately 1.2 cm x 1.0 cm is present on the left anterior chest wall, 4 cm lateral to the sternum in the 5th intercostal space.
- 2. No exit wound observed.
- 3. The surrounding tissue shows signs of close-range discharge (tattooing and burn marks)

### **INTERNAL EXAMINATION**

- 1. The Thoracic cavity reveals the presence of approximately 800 ml of blood (hemothorax) on the left side
- 2. The bullet has perforated the 5th intercostal space, penetrated the left lung, and entered the heart through the left ventricle.
- 3. Surrounding heart tissue shows contusion and haemorrhage. The bullet was found lodged in the pericardial sac and was retrieved.
- 4. Lungs are congested. The stomach contains partially digested food material; no smell of alcohol.

### **OPINION**

The injury is antemortem in nature and sufficient to cause death in the ordinary course of nature. The presence of tattooing and blackening around the wound suggests that the firearm was discharged from a range of less than 5 meters. The trajectory of the bullet and location of injury indicate that the victim was likely facing the assailant. The death occurred rapidly after injury due to massive internal bleeding and cardiac trauma. No signs of struggle or other external injuries were observed. The death was caused due to haemorrhagic shock and cardiac arrest resulting from a penetrating firearm injury to the heart.

Sd/-Received by IO

Advocacy Compet Dr Srikanda Raj Sd/-

Mr. Krishna S **Senior Pathologist** 

**SMILE Hospital** Sr. PI.

Pallavaram PS

27. 05. 2025

### ANNEXURE VI - BALLISTIC EXAMINATION REPORT

Name of the Laboratory: Forensic Science Laboratory, Hyderabad

Case Reference No.: FSL/HYD/BALL/3021/25

**Date of Report:** 10 June 2025

Investigating Officer: Inspector Krishna S, Hyderabad Police

Police Station: Pallavaram Police Station

FIR No.: 519/2025

### **SPECIMEN SUBMITTED**

1. One (1) 9mm Glock 17 pistol recovered from the accused- Exhibit B

2. One (1) Spent 9mm cartridge case recovered from the scene- Exhibit B1

3. One (1) Deformed bullet recovered from the victim's body- Exhibit B2

Date and time received: 27 May 2025

Submitted by: Inspector Krishna S

### **EXAMINATION CONDUCTED**

- 1. Visual and microscopic comparison of firearm and ammunition.
- 2. Firing test using test cartridges.
- 3. Comparison of test-fired cartridge cases and bullets with exhibits B1 and B2.

# OBSERVATIONS AND FINDINGS OVOCACY COM

- 1. The Glock 17 pistol (Exhibit B) is a real, semi-automatic firearm, 9mm calibre, operational and capable of firing.
- 2. The spent cartridge case (Exhibit B1) bears firing pin and breech marks consistent with the test-fired cases from Exhibit B.
- 3. The bullet recovered from the victim (Exhibit B2) exhibits rifling characteristics (6 lands and grooves, right twist) matching those produced by Exhibit B.
- 4. The range of firing was estimated to be less than 5 meters, based on entry wound characteristics analysed from the post mortem report.

### **CONCLUSION**

In the opinion of the undersigned, the pistol marked Exhibit B was used to fire the cartridge case marked Exhibit B1 and the bullet marked Exhibit B2. The firearm is in working condition and matches the ballistic characteristics of the recovered evidence.

**Certified By:** 

Sd/-

Dr. Apsaraa Iyer

**Ballistics Expert** 

Forensic Science Laboratory, Hyderabad



### ANNEXURE VII - FORENSIC SCIENCE LABORATORY REPORT

Name of the Laboratory: Forensic Science Laboratory, Hyderabad

Case Reference No.: FSL/HYD/TRACE/1262/25

**Date of Report:** 12<sup>th</sup> June, 2025

Investigating Officer: Inspector Krishna S, Hyderabad Police

Police Station: Pallavaram Police Station

FIR No.: 519/2025

### **CERTIFICATE OF EXAMINATION**

The Articles sent in were received by the State Forensic Science Laboratory for examination on 27<sup>th</sup> May 2025. The articles were received and sealed in a manner that corresponds to the materials as were informed to be received, all of which is summarised in the forensic report.

### **MATERIALS EXAMINED**

- 1. Exhibit F1- Swab from the accused's hands for GSR detection
- 2. Exhibit F2- Blood-stained shirt of the accused
- 3. Exhibit F3- Fingerprint samples recovered from the firearm

### **METHOD OF ANALYSIS**

The observations and tests conducted were through methods of collecting samples found at the scene of the offence.

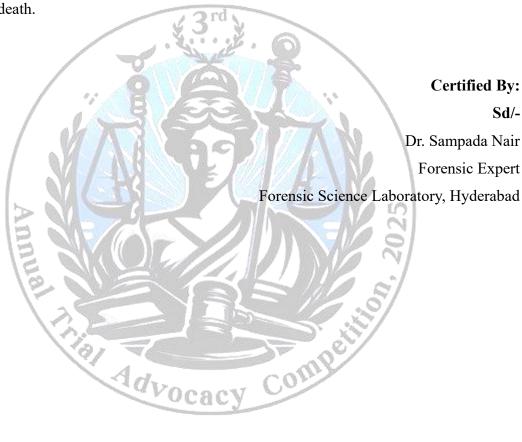
- 1. Latent Fingerprints were lifted by Cyanoacrylate vapour, after which the fingerprints were moved from the surfaces to a notecard by means of a lifting tape.
- 2. The State Forensic Science Laboratory used the standard methodology, i.e., to conduct friction ridge examinations, the ACE-V test.
- 3. The Fingerprint database was utilised by the State Laboratory to analyse the matter at hand.
- 4. Blood samples recovered from the accused's shirt were subjected to DNA profiling and blood typing.
- 5. Gunshot Residue (GSR) Test using SEM-EDX

### **FINDINGS**

- 1. GSR detected on both palms of the accused (Exhibit F1), confirming recent firearm discharge
- 2. Blood on accused's shirt (Exhibit F2) matched the victim's DNA profile
- 3. Fingerprints recovered from grip and trigger of the firearm match those of the accused.

### **CONCLUSION**

The forensic findings support the conclusion that the accused fired the weapon, resulting in the victim's death.



### ANNEXURE VIII - PRESCRIPTION GIVEN BY THE PSYCHIATRIST

## MINDSPACE WELLNESS CENTRE

DR. ANUSHREEYA JOSHI, M.D. (Psychiatry)

Banjara Hills, Hyderabad - 500034 Ph: 040-xxxxxxx | Email: anushreeya@mindspaceclinic.in

O.P. Teddy Daniels

24-04-2025

Age/Sex 31/male

Diagnosis:

F22.0 - Persistent Delusional Disorder

Co-morbid traits: Obsessive preoccupation, identity confusion under role immersion (occupational stressor—method acting)

Drug	Dosage	Frequency	Duration
Olanzapine 5mg		night	30 days
(antipsyc	hotic)		

Dr. Anushreeya Joshi

Anushreeya Joshi

M.D. (Psychiatry)

Reg. No: TS/Psych/2046

### ANNEXURE IX - FINAL REPORT / CHARGESHEET

## UNDER SECTION 193 OF BNSS, 2023

### 1. Details:

a) District: Ayanavaram

**b) P.S.:** Pallavaram

c) Year: 2025

d) FIR No.: 519/2025

2. Final Report/ Charge Sheet No.: 911/2025

3. **Date:** 20.06.2025

4. Act: Bharatiya Nyaya Sanhita, 2023 and Arms Act, 1959

Relevant Sections: 103 of BNS; 25 and 27 of the Arms Act.

5. Type of Final Form Report: Chargesheet

6. If Supplementary or Original: Original

7. Name of the I.O.: Krishna S Rank: Sr. PI.

8. Name of the Informant: Ms Rachika Shekhar

9. Particulars of the Accused Person charged: Accused No. 1

i. Name: Teddy Daniels Whether verified: Yes

ii. Father's Name: Ram Mehta

iii. Age: 30 DOB: 19.11.1995

iv. Sex: Male

v. Blood Group: O +ve

vi. Nationality: India

vii. Address: Villa No. 8, The Cascade, Jubilee Hills, Hyderabad.

Whether verified: Yes

viii. Provisional Crime No.: 112/2025

ix. Regular Crime No.: N/A

x. Date of Apprehension: 26.05.2025

xi. Date on which forwarded to Court: 27.05.2025.

xii. Under Acts and Section: 103 of BNS; 25 and 27 of the Arms Act.

xiii. Status of the accused: Judicial Custody

10. **Brief Facts of the Investigation:** Based on the statements given by Ayushmaan Singh, Rachika Shekhar and Abhilash Gaikwad, along with the ballistics report, FSL report and post-mortem, it can be concluded that the accused shot the victim with the intention of causing death after taking premeditated steps.

### 11. List of Prosecution Witnesses

- i. Ayushmaan Singh
- ii. Rachika Shekhar
- iii. Abhilash Gaikwad
- iv. Dr. Srikanda Raj
- v. Dr. Apsaraa Iyar
- vi. Dr. Sampada Nair
- vii. Inspector Krishna S

Forwarded by Station House Officer - Vijay Kumar

Officer in Charge. Sd/-

Name: Krishna, Sr. PI.

Signature of I.O submitting the final Report: Sd/-

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### **STATEMENTS OF PROSECUTION WITNESSES**

UNDER SECTION 181 OF BNSS, 2023

### PW-1 AYUSHMAAN SINGH

Age: 50

Occupation: Director

Address: Villa No. 14, Road No. 12, Banjara Hills, Hyderabad.

STATEMENT: I am the director of the show Behind the Badge, which was being shot at FilmCity Studios, Hyderabad. The accused, Teddy Daniels, and the deceased, Dev Kumar, were the lead actors in the film. I have worked closely with both Teddy and Dev on previous projects. Teddy, who was the protagonist, was playing the role of a police officer, and Dev was cast as the antagonist, who was a notorious gangster and serial killer. Teddy and Dev were both brilliant up-and-coming actors who could be considered rivals due to their proximity in age and popularity. Even though they were both similarly acclaimed, they had very different processes as actors. While Teddy was the textbook definition of a method actor, Dev was more of a chameleon actor who could sway the audience with his charisma. This was one of the reasons Dev had the highest popularity rating of all characters in the show, many of my scripts began to focus on him, which resulted in a decrease in Teddy's screen time. Teddy quickly noticed this change and confronted me one day, angrily accusing me of being a third-rate director. We had a heated argument, but I ultimately managed to calm him down.

Teddy's behaviour on this shoot was consistent with his usual style—he was disciplined, intense, and very focused. However, over time, his immersion in the role began to concern me. I noticed that Teddy had become increasingly immersed in his role over the past two weeks. On occasions, he insisted on being addressed as 'Inspector Daniels' and sometimes forgot to break character, even off-camera. On more than one occasion, he disrupted rehearsals by accusing junior artists and crew members of being 'undercover criminals' or 'spies', which was not part of the script. Dev had expressed discomfort to me regarding Teddy's behaviour. He told me privately that Teddy's intensity was crossing professional boundaries and that he felt unsafe around him. I intended to speak to Teddy formally about it after that day's shoot.

On the day of the incident, we were filming a confrontation scene where the inspector had finally caught the gangster after he had brutally murdered the Inspector's family. The morally bound inspector looked past the crime against his family and was supposed to arrest him and produce him before the court. During this transfer, the gangster was supposed to escape, hence setting up the season finale of the show. Teddy and Dev were supposed to rehearse with a dummy weapon provided by the props department. However, during the take, Teddy pulled out a different firearm, pointed it at Dev, and fired while Dev's character was supposed to escape from the police. It was completely unexpected. Everyone initially thought it was a special effect until Dev collapsed, and blood was seen on his chest. When I went to check, he was dead on the spot.

Immediately after the shot, Teddy said, "It had to be done. No one else could see what he truly was. I could not let him escape". He appeared calm but disconnected from the situation, as though he believed he had completed some kind of mission. He made no attempt to flee. I immediately rushed to inform Dev's Girlfriend.

I have always made sure to thoroughly vet the props we use and have a very rigorous security check in place, and I can confirm that the props department was not issued any real firearms by any relevant authority, and that no one was aware of Teddy bringing any private weapons onto the set. As the director, I was never informed of any such intention or possession.

I have cooperated with the police fully and will be available for further questioning if required. My statement was recorded by a Police Officer and read over to me, and I confirm that it has been correctly recorded.

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PW-2 RACHIKA SHEKHAR

Age: 22

Occupation: Influencer

Address: Villa No. 7, The Cascade, Jubilee Hills, Hyderabad.

**STATEMENT:** My name is Rachika Shekhar. I was in a relationship with Dev Kumar for a little over five years. We lived together in Jubilee Hills. Dev was an actor by profession and was

working on a show titled Behind the Badge at the time of his death.

Dev was always the true star of that show and had even won awards for best supporting actor by a lot of prestigious award shows. Even his popularity rating was much higher than Teddy's, even though he was the antagonist of the show. In fact, Dev had received numerous casting calls from directors after they watched his performance in the show, while Teddy had failed to secure any other acting gigs in the recent past. As they were both around the same age and were of similar height and build, they were considered by most to be rivals, even though Dev was far better looking and a much more talented actor than Teddy. Dev had expressed to me multiple times how competitive and jealous Teddy had gotten of Dev when Dev became the highest-earning actor in the show. On many instances, Teddy had supposedly joked with Dev that if Dev were out of the picture, Teddy would be a far more critically acclaimed actor. I feel their relationship reached the lowest point when Dev signed an endorsement deal with a brand that Teddy had always wanted to be a part of. They used to keep squabbling over acting methods and whose way was right more often than not. While Dev considered Teddy a friend, I sensed that Teddy looked at Dev as nothing more than an obstacle to his career.

Dev began to express discomfort about Teddy from the last few weeks of the shoot. He said Teddy was intense, more than what was normal for method acting. He said Teddy would often invade his personal space, glare at him off-camera, and at times even mutter threatening lines from the script while they weren't filming.

I asked Dev if he thought Teddy was mentally unstable. He said, "No, not unstable. Just... obsessive. Like he thinks he owns the film, and I'm in the way." Dev felt that Teddy was deliberately intimidating him, not because he believed in the character, but because he didn't like being upstaged. Teddy had a history of doing this—getting overly competitive with his coactors. I've heard from Dev that Teddy once refused to shoot a scene until a junior actor's lines were cut.

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A few days before the incident, Dev told me that Teddy had started improvising violent scenes during rehearsal without permission. Once, during a scene rehearsal, Teddy suddenly lunged at Dev and pinned him against a wall. Everyone was shocked. Dev told me the director had to call a break, but Teddy laughed it off and said he was "just adding realism."

On the evening before the incident, Dev seemed unusually quiet. When I asked him, he said, "I don't trust that guy. I wouldn't be surprised if he tried something stupid for attention." He was worried Teddy might intentionally mess up a scene or create an on-set conflict to get him removed from the film.

On the day of the incident, I received a call that Dev had been shot on set. When I got to the studios, he had already passed away. So I immediately called the police and filed a complaint. I later found out Teddy had brought a real gun to the shoot, without informing anyone. That's not delusion—that's planning.

Dev was a professional. He knew the difference between a difficult co-actor and someone who was genuinely unwell. If Teddy was truly out of touch with reality, Dev would've said so. He didn't. He said Teddy was dangerous because he knew exactly what he was doing. I believe Teddy acted deliberately, and this was not the result of any mental illness. He used that role as an excuse to carry out something he had already decided to do.

My statement was recorded by a Police Officer and read over to me, and I confirm that it has been correctly recorded.

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PW-3 ABHILASH GAIKWAD

Age: 36

Occupation: Props Manager

Address: Flat No. 405, Green Grace Apartments, Gachibowli, Hyderabad.

**STATEMENT:** My name is Abhilash Gaikwad. I have been working as a professional props manager in the film industry for 18 years. I was in charge of all on-set props for the show Behind the Badge, currently being shot at FilmCity Studios, Hyderabad. This included all firearms and imitation weapons used for scenes.

As per studio protocol, all weapons used in filming are to be logged, inspected, and handled exclusively by my team. We use only rubber or non-firing replica firearms unless a special clearance has been granted, which, in this case, was not. No real weapons were present or approved in our official props inventory.

On the morning of the incident, I had issued a rubber dummy pistol to the assistant director for Scene 47, in which Teddy Daniels was to threaten Dev Kumar's character. I personally inspected and handed over the fake weapon from our secure props case. About 10–15 minutes before the take, I saw Teddy sitting alone in one of the holding rooms, rehearsing. I noticed he was handling something metallic, not the prop weapon we issued. It struck me as unusual, but I assumed he might be using a weight-modified dummy for personal prep. I did not interrupt him because he gets mad when any of us disturb his process.

After the shooting incident, I immediately checked our props case. The dummy pistol issued for that scene was missing. Later, I found it behind one of the stacked crates near the director's tent. The weapon recovered from Teddy by the police was not from our inventory.

I can confirm that Teddy never declared any personal weapon to me or anyone on the props team. Bringing a live firearm onto a film set without clearance is a gross violation of industry safety standards. I believe Teddy intentionally replaced the dummy gun with a real one he brought himself. No part of this act was accidental. There is no way he could have mistaken the two. The fake guns are lightweight, rubber-moulded, and clearly non-functional. The one he used was real steel, with weight and a magazine. I have worked on over 60 film sets, including with method actors, and I've never witnessed such a breach of safety and protocol. If I had known or suspected it was a real weapon, I would have shut the shoot down immediately.

[22]

My statement was recorded by a Police Officer and read over to me, and I confirm that it has been correctly recorded.



STATEMENTS OF DEFENCE WITNESSES

LIST OF DEFENCE WITNESSES (Provided as an Aide Memoire)

1. Dr Anushreeya Joshi

2. Jyoti Ramesh

3. Karan Arora alias Tappu

4. Ansar Ahmad

**DW-1 DR ANUSHREEYA JOSHI** 

Age: 45

Occupation: Psychiatrist

Address: Villa No. 18, Aparna Palm Meadows, Suchitra Circle, Kompally, Hyderabad.

STATEMENT: My name is Dr. Anushreeya Joshi, and I am a consultant psychiatrist with 15 years of clinical experience, currently attached to Fortis Hospital, Hyderabad. I have previously seen Mr. Teddy Daniels as an outpatient in 2024, when he presented symptoms consistent with emotional dysregulation and identity disturbances, initially assessed as traits of Borderline Personality Disorder. However, following the events leading to the death of Dev Kumar, I was requested to conduct a comprehensive psychiatric evaluation of Teddy Daniels during judicial custody.

Upon my clinical interaction with Mr. Daniels over multiple sessions after the incident, I observed symptoms consistent with Delusional Disorder, Persecutory and Grandiose Type. Teddy was unable to distinguish between his real identity and the character he was portraying in the show "Behind the Badge." He insisted repeatedly that he was a police officer, referred to himself only as "ACP Teddy," and claimed that Dev Kumar was part of a criminal syndicate involved in human trafficking.

When asked about the shooting, he calmly responded that he had "neutralised the threat" and added, "I warned the team he was dangerous. No one listened. I had to act." He did not demonstrate remorse, not from cruelty, but due to a firm belief that he had performed a civic duty. He perceived the film set as a real-life operation, often referencing imaginary government orders and covert surveillance.

[24]

Further, his sister, Ms. Jyoti Ramesh, informed me that Teddy had shown similar patterns of delusional immersion during a theatre role in 2020, wherein he began investigating neighbours for being "terror suspects" while playing an intelligence agent on stage. He had also once kept a diary detailing fake police investigations and shadowed random strangers, believing them to be criminals.

Notably, Teddy had completely blurred the boundaries of performance and reality. He began calling his co-actors by their character names even off-set, insisted on being addressed by his role's rank, and refused to eat unless the food was "cleared by the department."

He demonstrated no understanding that his beliefs were unfounded and was unreceptive to logical contradiction or redirection. These delusions were fixed, non-bizarre in structure, and rooted in a rigid belief system.

It is my considered medical opinion that at the time of the incident, Teddy Daniels was under the influence of a fixed delusional state. His psychiatric condition impaired his capacity to understand the nature and wrongfulness of his actions. In such a state, he believed himself to be acting under lawful authority and duty.

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Advocacy

**DW-2 JYOTI RAMESH** 

Age: 35

Occupation: Fitness Coach

Address: Flat No. 8-B, Lovely Apartments, Kakatiya Hills, Madhapur, Hyderabad.

**STATEMENT**: My name is Jyoti Ramesh, and I am the elder sister of Mr. Teddy Daniels. We have been close since childhood, and I have witnessed his personal and professional journey for years. Teddy has always been deeply committed to his craft, sometimes to an unhealthy extent.

In the weeks leading up to the incident, Teddy became increasingly withdrawn and detached. He refused to answer personal calls and only communicated through text, often using phrases like "Operation is active" or "Need clearance to engage." At one point, he showed up at my home dressed entirely in police attire, despite there being no rehearsal or shoot scheduled that day. He addressed our mother as "Ma'am" and told her to keep her phone "under surveillance."

On 25-04-2025, he insisted on inspecting my husband's car because he "suspected contraband". He checked the trunk and glove box, all while referring to his script. When he found the contraband, he asked us to pay an unofficial fine. Imagine paying a bribe to your own brother. It wasn't a joke —he was completely serious. When I confronted him, he snapped and said, "You civilians don't understand protocol."

Teddy had always immersed himself in his roles, but this time, he never stepped out of character — not even for a second. He stopped referring to himself as Teddy. At family gatherings, he interrogated relatives under the belief that one of them might be linked to an "ongoing case."

I tried convincing him to see a doctor, but he said the medical system was compromised and that "psychiatrists plant memories." This was disturbing, and I feared for his mental health. I reached out to a family counsellor we had seen two years ago during a past depressive episode, but Teddy refused to meet them.

This role seemed to completely consume him. The delusions he held were not part of his performance — they were his reality. In his mind, he was a real officer on a real mission, and Dev Kumar, whom he repeatedly called "a threat to national security," was not an actor but a villain to be neutralised.

I firmly believe that Teddy was not in control of his actions and did not understand the gravity of what he was doing. His mind was operating within an alternate version of reality — one constructed and reinforced by his mental illness.



DW-3 KARAN ARORA ALIAS "TAPPU"

Age: 22

Occupation: Makeup Artist

Address: Flat No. 25, Rekha Apartment, Porbandar Road, Charminar, Hyderabad.

STATEMENT: My name is Karan Arora, and they call me "Tappu" on set. I have been working

as a junior makeup artist in the industry for 5 years. I was assigned to actor Teddy Daniels

during the shoot of "Behind the Badge" and interacted with him on an almost daily basis for

over three weeks.

From the very first day, Teddy's behaviour was highly unusual. Unlike other actors, he never

responded to his real name — he would only acknowledge being called "ACP Teddy". If I

mistakenly addressed him as Teddy, he would sternly correct me and sometimes even question

my loyalty.

During a makeup session, Teddy suddenly stood up and locked the vanity van door. He

whispered to me, "Don't look outside. There may be agents watching us. You're safe here". I

thought he was joking, but he remained serious and tense for the next 20 minutes. I later

reported this incident to the assistant director, who dismissed it as 'just method acting.'

On another occasion, Teddy refused to wear the blood pack for a scene. He said, "We'll have

the real thing soon. No need for fakes". He was cold, unblinking, and entirely consumed by the

persona. He also started carrying around a small notebook, scribbling "intel" and "targets" in

code. I once saw the name 'Dev' written multiple times, with circles around it and the words

'confirm and execute' written beside it.

Over time, Teddy started inspecting my makeup kit every morning. He claimed he was

"checking for bugs". Once, when I laughed nervously, he asked, "Are you compromised too?"

I avoided being alone with him after that.

These were not instances of deep preparation for a role — they were signs of someone who

had genuinely lost touch with reality. I have worked with many actors, including method actors,

but I have never encountered someone who lived entirely in their role without a break, and with

such intensity. He was not acting — he believed in a world that only existed in his mind.

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The day of the incident, I saw Teddy in the green room pacing back and forth, muttering under his breath. When I asked if he needed a touch-up, he said, "Not now. We're minutes away from taking down the target. Maintain silence". I didn't realise then how serious he was.

The next thing I remember, I heard shouting on set. Then a loud bang. Dev was on the floor. Teddy was standing there, looking stunned — not like someone who'd just killed an actor, but like someone who believed the mission had succeeded. Even after the chaos, Teddy didn't run. He kept saying, "It had to be done. He would've hurt civilians" over and over again.

This wasn't a moment of rage or revenge. He thought he was stopping a real threat. He wasn't playing a part. He believed it. I believe Teddy was convinced he was a real police officer, and that, to me, is what's most frightening.



**DW-4 ANSAR AHMAD** 

Age: 40

Occupation: Actor

Address: Flat No. 23, Granita Apartments, Koh-e-Sar Colony, Shaikpet, Hyderabad.

STATEMENT: My name is Ansar Ahmad, and I am a method actor. I have worked with Teddy

Daniels in several movies between 2023 and early 2024, during the course of which, we became

quite close. I specialise in Stanislavski-based and Strasberg-derived approaches, which require

an actor to immerse themselves emotionally and psychologically into their character's world.

Teddy and Dev were just contemporaries, and while they might not have been the thickest of

friends, they viewed each other the way you would your colleagues. When I had spoken to

Teddy about Dev's increasing popularity, he told me "Dev is a guy who comes from nothing,

he had to sell his belongings to take acting classes, guys like him coming up is something the

fans relate to because he is an underdog, so, if he is going to be as popular as me, good for

him".

Teddy was brilliant — maybe too brilliant. He had a remarkable ability to transform, but he

also showed signs of difficulty detaching from roles. In 2022, during rehearsals for a stage

adaptation of "Taxi Driver," Teddy began shadowing strangers in real life, convinced they were

hiding something. I advised him to pause the process and take a break. He refused.

When he told me about his role in "Behind the Badge" as ACP Teddy, I warned him that playing

a law enforcement officer, especially one navigating betrayal and crime, might trigger

obsessive or protective tendencies. He laughed and said, "That's the point. If I believe it's real,

the audience will too."

By April 2025, I saw a significant shift in his behaviour. He called me twice, but never referred

to himself as Teddy. He said, "Intel suggests the villain may be using the film to smuggle

messages." I was confused. I thought he was workshopping lines. The week before the incident,

I met him outside the studio. He asked me, "Would the department cover me if I took action?"

I thought it was a dialogue.

In my opinion, Teddy entered a state of full-blown delusional immersion. He wasn't performing

— he was living as ACP Teddy. This phenomenon, while rare, is known in method acting

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circles. It is a psychological collapse of identity, often seen in actors with pre-existing emotional vulnerabilities.

What happened on 26-05-2025 was not murder by motive. It was the culmination of an untreated psychological breakdown, worsened by the method acting process. Teddy believed he was protecting the public from a dangerous man. He acted from belief, not malice.



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Advocacy