

IN THE COURT OF METROPOLITAN MAGISTRATE (DISTRICT _____),

DELHI

BAIL APPLICATION NO. _____ OF 2017

IN THE MATTER OF :

STATE

COMPLAINANT

VERSUS

X _____ S/o _____ R/o _____

.....APPLICANT

FIR NO. _____

U/S _____

POLICE STATION _____

APPLICATION FOR GRANT OF BAIL UNDER SECTION 437 OF CR.P.C.

The accused above named most respectfully showeth :-

1. That the accused above named was arrested by the police on _____, 20XX and is in judicial custody since then. It is alleged that on _____, 20XX, the accused was suspiciously moving on _____ when the police apprehended him, conducted the search and recovered ___ gms. of smack from his pocket.
2. That the accused has been falsely implicated in the instant case and he has nothing to do with the alleged offence.
3. That nothing was recovered from the possession of the accused or at his instance and the so called case property has been planted upon the accused.
4. That the accused is a law abiding citizen and belongs to a very respectable family. He has never indulged in any illegal activities and commands respect and admiration his locality.
5. That in _____, 20XX, the accused found some persons selling smack near _____. The accused immediately reported the matter to police as the result of which police also arrested some of the persons. Since that time, those persons who were arrested at the instance of the accused, were threatening the accused to falsely implicate him in a criminal case in collusion with police. The accused made a complaint in this regard to the Dy. Commissioner of Police, true copy of which is annexed hereto as **Annexure-A**.
6. That after the said complaint, the accused was called by the Vigilance Department, _____ Police who enquired into his complaint. True copy of the said notice issued by the Vigilance Cell is enclosed herewith as **Annexure-B**.
7. That it is unimaginable that the accused who made a complaint against the sellers of smack, would himself indulge in such activities.
8. That the accused is a permanent resident of _____ and there are no chance of his absconding in case he is released on bail.

9. That there is no chance of the accused absconding or tempering with the prosecution evidence in the event of release on bail.

10. That the accused undertakes to join the investigation as and when directed to do so.

11. That the accused is not a previous convict and has not been involved in any case of this nature except the present case.

12. That the present case is a result of clear manipulation by the police.

13. That the accused from all accounts is an innocent person. It is therefore respectfully prayed that the accused may kindly be released on bail during the pendency of this case.

APPLICANT

THROUGH

Dated :

ADVOCATE