IN THE COURT OF THE SPECIAL JUDICIAL FIRST CLASS MAGISTRATE FOR EXCISE & PROHIBITION CASES AT

Crl.M.P.No. of 20 in Cr. No. of 20 of P.S.

Between:-

---Petitioner/Accused No.

And

The State of through S.H.O., P.S.

---Respondent/Complainant

CHARGES UNDER SEC.

PETITION FILED U/SEC.480 OF B.N.S.S

The petitioner humbly submits as under:-

- 1. The petitioner is the alleged Accused in the above crime. The petitioner did not commit the alleged offence or any other offence whatsoever. The Respondent Police have falsely implicated the petitioner in the above crime at the instance of some interested persons in order to harass him.
- 2. The petitioner was remanded to Judicial Custody on -20 by this Hon'ble Court. Since then the petitioner is in Judicial Custody.
- 3. The allegation of the prosecution is that the Excise Police found Liters of I.D.Liquor in possession of the petitioner and seized the same under a cover of panchanama.

The said allegation is false and far away from the truth, hence denied by the petitioner. The petitioner is no way concern with the alleged offence or any other offence.

- 4. The petitioner is only earning member of his family and his family members are completely depended upon his earnings. If he is not enlarged on bail his family members will be put into great hardship.
- 5. The petitioner is a law abiding citizen and he will not avoid the due process of laws. The petitioner is ready to furnish sureties to the satisfaction of the Hon'ble Court.
- 6. Thisisthefirstbailpetitionfiledbythepetitionerandnootherbailpetitionis filed or pending in any other Court including the Hon'ble High Court of

It is therefore, prayed that the Hon'ble Court may be pleased to enlarge the petitioner on bail, pending trial, in the interest of justice.

Date: - - -20 Advocate for the Petitioner.

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FILEDON:- - -20

FILEDBY:-

ADVOCATE