**BEFORE THE HON’BLE DISTRICT AND SESSIONS JUDGE, LUCKNOW**

Criminal Misc. Case No. (B) of 2025

Sanjay Kumar Singh .........Applicant

(In Jail Since 15.06.2025)

Versus

Central Bureau of Investigation .....Opposite Party

**INDEX**

|  |  |  |
| --- | --- | --- |
| Serial No. | Description of Papers | Page Nos. |
| **1.** | First Bail Application u/s 483 BNSS |  |
| **2.** | Affidavit in support of Bail Application |  |
| **3.** | **Annexure No. 1:** Copy of the FIR bearing Crime No. RC0062025A0016 dated 13.06.2025 under section 61(2) BNS and Section 7 of Prevention of Corruption Act, 1988, P.S CBI, ACB, Lucknow lodged on 13.06.2025 |  |
| **4.** | **Annexure No. 2:** Copy of the arrest memo along with grounds of arrest and personal search memo |  |
| **5.** | **Annexure No. 3:** Copy of the search list |  |
| **6.** | **Annexure No. 4:** Copies of the medical reports of the applicant |  |
| **7.** | **Annexure No. 5:** Copy of the application |  |
| **8.** | I.D Proof the Deponent |  |
| **9.** | Memo |  |

Date: **ARPAN PRAKASH SRIVASTAVA**

Place: Lucknow (ADVOCATE)

AOR- B/A- 2718

Reg. No. UP5773/ 2020

Mob: 8400231200

(Counsel for the Applicant)

**BEFORE THE HON’BLE DISTRICT AND SESSIONS JUDGE, LUCKNOW**

Criminal Misc. Case No. (B) of 2025

Sanjay Kumar Singh aged about 49 years Son of Late Sri Balram Singh Resident of D-205/2, Phulwariya, Varanasi

......Applicant/ Accused

(In Jail since 15.06.2025)

Versus

Central Bureau of Investigation through Anti Corruption Branch, 7, Naval Kishore Road, Hazratganj, Lucknow .....Opposite Party

Case No. RC0062025A0016

Dated 13.06.2025

Under Section 61(2) BNS and Section 7 of Prevention of Corruption Act 1988

P.S- CBI, ACB Lucknow

**FIRST BAIL APPLICATION UNDER SECTION 483 BNSS**

Wherefore, for the facts and circumstances as stated in the accompanying affidavit, its is most respectfully prayed before this Hon’ble Court that the Hon’ble Court may graciously be please to enlarge the applicant on bail during the pendency of trial, in the interest of justice.

Date: **ARPAN PRAKASH SRIVASTAVA**

Place: Lucknow (ADVOCATE)

AOR- B/A- 2718

Reg. No. UP5773/ 2020

Mob: 8400231200

(Counsel for the Applicant)

**BEFORE THE HON’BLE DISTRICT AND SESSIONS JUDGE, LUCKNOW**

Criminal Misc. Case No. (B) of 2025

Sanjay Kumar Singh aged about 49 years Son of Late Sri Balram Singh Resident of D-205/2, Phulwariya, Varanasi

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Versus

Central Bureau of Investigation through Anti Corruption Branch, 7, Naval Kishore Road, Hazratganj, Lucknow .....Opposite Party

Case No. RC0062025A0016

Dated 13.06.2025

Under Section 61(2) BNS and Section 7 of Prevention of Corruption Act 1988

P.S- CBI, ACB Lucknow

**AFFIDAVIT IN SUPPORT OF BAIL APPLICATION**

I, **Ruby Singh,** aged about 49 years Wife of Sanjay Kumar Singh Resident of D- 205/2, Phulawaria, Near 39, GTC Firing Range Gate, Chandpur District Varanasi Pin 221106, Qualification-Occupation- Home Maker, the deponent do hereby solemnly affirm and state on oath as under:-

1. That the deponent is the wife of the applicant / accused and doing pairvi of the above mentioned bail application on behalf of him as such she is fully conversant with the facts and circumstances of the case deposed herein under.
2. That this is the first bail application on behalf of the applicant/ accused and apart from this, no other bail or application is pending or disposed either by this Hon’ble Court or by the Hon’ble High Court.
3. That the accused/ applicant is languishing in jail since 13.06.2025 on the basis of the alleged FIR bearing Crime No. RC0062025A0016 dated 13.06.2025 under section 61(2) BNS and Section 7 of Prevention of Corruption Act, 1988, P.S CBI, ACB, Lucknow. Copy of the FIR bearing Crime No. RC0062025A0016 dated 13.06.2025 under section 61(2) BNS and Section 7 of Prevention of Corruption Act, 1988, P.S CBI, ACB, Lucknow lodged on 13.06.2025 is annex herewith as **ANNEXURE NO. 1**
4. That as per the story narrated in the impugned FIR, the allegations against the applicant is that on 13.03.2025, the applicant, who was employed as the post of Assistant Superintendent Post Office (ASPOs), visited Sub Post Office, Sewapuri, where the complainant was employed as MTS is preparation of Aadhar Card. The applicant directed the complainant to produce the aadhar register and the applicant after pursuing the same, took away the aadhar register with him. On 15.03.2025, the complainant visited the office of the applicant and requested to return the Aadhar register so that the work relating to the preparation of the Aadhar Card may be done smoothly. On this the applicant demanded the bribe of Rs. 20,000/- from the complainant for returning the aadhar register as well as not to initiate any against the complainant. The complainant took back the register from him on the pretext that the demanded amount was not available with him at present and the same would be provided later on. It is also alleged that Sri Ravendra Sahu, ASPOs West Division was on leave and the applicant was give the charge of Sri Ravendra Sahu, ASPOs West Division and on that very day, the applicant again visited the Sub post Office, Sewapuri, Varanasi along with the co-aacused Sri Atma Giri who was employed as GDS-ABPM, Khewali Sub post Office, Sewapuri, Varanasi and took away the Aadhar Register and Rs. 20,000/- from him forcefully in the previous matter dated 13.03.3035 as mentioned above. It is further alleged that on 08.06.2025, the applicant threatened the complainant through whatsapp Voice Call to pay Rs. 50,000/- if he wanted the Aadhar register back and no action is initiated against him. It is also alleged in the complainant that Sri Atma Giri (co-accused) demanded bribe of Rs. 50,000/- from him on the behest of the applicant and also threatened him to prepare for dire consequences if the demanded bribe amount is not paid.
5. That it is pertinent to mention here that the applicant is innocent and has not committed as alleged.
6. That the allegation has been levelled against the applicant was of March 2025 and 6th June 2025 but the complainant was received before the CBI on 12.06.2025 and there is no explaination of the delay in lodging the impugned FIR.
7. That the complainant has allege that the applicant took away Rs. 20,000/- from him forcefully but there is no recovery from the applicant either of cash or any transaction seen in the bank account of the applicant.
8. That the investigating agency has also said that the applicant was caught red handed but the investigating agency was unable to show any recovery of the alleged amount for the applicant.
9. That the investigating agency has also handed over the copies of arrest memo, grounds of arrest and personal search memo of the to the kin of the applicant. Copy of the arrest memo along with grounds of arrest and personal search memo is annex herewith as **ANNEXURE NO. 2**.
10. That by bare pursual of the memo of grounds of arrest of the applicant, no specific ground of arrest has been mentioned in the memo of grounds of arrest.
11. That it is further relevant to mention here that the search was also conducted by the CBI in the house of the applicant on 14.06.2025 at from 04:30 PM to 06:30 PM and there was nothing material found in the house of the applicant except the Aadhar register of the complainant. Copy of the search list is annex herewith as **ANNEXURE NO. 3**.
12. That it is pertinent to mention here that Aadhar register of the applicant was taken by the applicant as he got to know that there are discrepancies in the Aadhar register and only to enquire that, the applicant took the possession of the Aadhar register of the complainant.
13. That the applicant found some major discrepancies in the Aadhar register and applicant also received some complaint against the complainant and was about to enquire on that.
14. That the complainant, to safeguard himself, lodged the impugned FIR against the applicant so that the applicant cannot initiate any enquiry against the complainant.
15. That there is no transaction of money, as alleged in the FIR, between the applicant and co accused.
16. That the applicant is suffering from major ailments which includes hemoglobin issued, Blood Pressure, Diabetes. A kidney of the applicant has also been transplanted which leads to several major health issued. Copies of the medical reports of the applicant is annex herewith as **ANNEXURE NO. 4**
17. That it is very relevant to mention here that on 15.06.2025 i.e., the date on which the CBI presented the applicant before the Learned Remand Magistrate, Lucknow, the applicant, after standing for some time suddenly fall on the ground and hence an application to refer the applicant to the jail was presented before the Learned Remand Magistrate and the Learned Remand Magistrate pleased to grant permission to refer applicant to the Jail Hospital. Copy of the application is annex herewith as **ANNEXURE NO. 5**
18. That the trial is going to take time for no fault of the accused- applicant, and is entitled for bail, during the pendency of the trial.
19. That it is pertinent to mention here that there is no substantive evidence against the applicant.
20. That it is submitted that the allegations mentioned in the FIR is absolutely false, incorrect and concocted.
21. That the applicant is absolutely innocent and has not committed any offence whatsoever as has been alleged in the FIR.
22. That the applicant has no previous criminal history and neither a previous convict.
23. That the applicant has sufficient movable and immovable properties and in ready to furnish the bail bonds.
24. That the conduct and activities of the investigating agency against the applicant is not fair rather seems to be inimical.
25. That as per the story narrated in the aforesaid FIR, there is nothing against the applicant seems to be true in nature.
26. That the applicant will not misuse the liberty granted by this Hon’ble Court and will appear before the court or before the investigating officer whenever it is required.
27. That the applicant is a severely ill person and has multiple ailments and hence languishing the applicant in jail may also leads to deteriorate the health condition of the applicant.
28. That the applicant is ready to furnish the bail bond as per the direction of this Hon’ble Court.

**LUCKNOW DEPONENT**

**DATE:**

**VERIFICATION**

I, the above named deponent, do hereby verify that the contents of paragraphs no. 1 to 28 of this affidavit are true to my personal knowledge and believes. No part of it is false and nothing material has been concealed,

**So help me God**

Signed and verified on 17th day of June, 2025 at Civil Court Compound, Lucknow

**BEFORE THE HON’BLE SPECIAL JUDGE, ANTI CORRUPTION, CBI, COURT NO. 3, LUCKNOW**

C.M. Application No. of 2025

In Re:

Criminal Misc. Case No. **4643** (B) of 2025

Sanjay Kumar Singh aged about 49 years Son of Late Sri Balram Singh Resident of D-205/2, Phulwariya, Varanasi

......Applicant/ Accused

(In Jail since 15.06.2025)

Versus

Central Bureau of Investigation through Anti Corruption Branch, 7, Naval Kishore Road, Hazratganj, Lucknow .....Opposite Party

Case No. RC0062025A0016

Dated 13.06.2025

Under Section 61(2) BNS and Section 7 of Prevention of Corruption Act 1988

P.S- CBI, ACB Lucknow

**APPLICATION FOR TAKING REJOINDER AFFIDAVIT ON RECORD**

May it please your lordship,

For the facts, reasons and circumstances stated in the accompanying rejoinder affidavit duly sworn by the pairokar, the applicant humbly prays before this Hon’ble Court to kindly take this instant rejoinder affidavit on record and enlarge the applicant on bail during the pendency of the trial, it the interest of justice.

Date: **ARPAN PRAKASH SRIVASTAVA**

Place: Lucknow (ADVOCATE)

AOR- B/A- 2718

Reg. No. UP5773/ 2020

Mob: 8400231200

(Counsel for the Applicant)

**BEFORE THE HON’BLE SPECIAL JUDGE, ANTI CORRUPTION, CBI, COURT NO. 3, LUCKNOW**

C.M. Application No. of 2025

In Re:

Criminal Misc. Case No. **4643** (B) of 2025

Sanjay Kumar Singh aged about 49 years Son of Late Sri Balram Singh Resident of D-205/2, Phulwariya, Varanasi

......Applicant/ Accused

(In Jail since 15.06.2025)

Versus

Central Bureau of Investigation through Anti Corruption Branch, 7, Naval Kishore Road, Hazratganj, Lucknow .....Opposite Party

Case No. RC0062025A0016

Dated 13.06.2025

Under Section 61(2) BNS and Section 7 of Prevention of Corruption Act 1988

P.S- CBI, ACB Lucknow

**REJOINDER AFFIDAVIT**

I, **Ruby Singh,** aged about 49 years Wife of Sanjay Kumar Singh Resident of D- 205/2, Phulawaria, Near 39, GTC Firing Range Gate, Chandpur District Varanasi Pin 221106, Qualification-Occupation- Home Maker, the deponent do hereby solemnly affirm and state on oath as under:-

1. That the deponent is the wife of the applicant / accused and doing pairvi of the above mentioned bail application on behalf of him as such she is fully conversant with the facts and circumstances of the case deposed herein under.
2. That for the proper assistance of the Hon’ble Court, para- wise reply of the counter affidavit is necessary and hence the applicant is submitting his para- wise reply for the counter affidavit which is as follows:-

**PARA- WISE REPLY**

1. That the contents of para 1 and 2 of the counter affidavit filed by the opposite party is the matter of personal knowledge and the matter of record and hence need no reply.
2. That the contents of para 3 of the counter affidavit filed by the opposite party is the story narrated in the alleged FIR and hence needs no reply.
3. That the contents of para 4 of the counter counter affidavit filed by the opposite party is wrong, misleading and hence denied by applicant and in reply thereto it is submitted that the applicant has never raised any demand of bribe from the informant and the complainant never paid a single penny to the applicant either through cash or account and it is further submitted that the applicant was senior official of the complainant and and also incharge of scrutinizing the work of the complainant and hence after countering some discripncies in the work of the complainant, the applicant warned him for the inquiry against him and hence to safeguard himself, the complainant has lodged the alleged FIR against the applicant totally upon false and fabricated facts.
4. That the contents of para 5 and 6 of the counter affidavit filed by the opposite party needs no reply till it related to the allegations upon the co accused person hence all is denied. It is further accepted that there is a chance that the demand of bribe raised from the co accused but it has no relation with the applicant.
5. That the contents of para 7 of the counter affidavit filed by the opposite party needs no reply as it relates to the arrest of the accused persons and further procedure of the remand.
6. That the contents of para 8 and 9 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied by applicant and in reply thereto it is submitted that the applicant is an innocent person and has not committed as alleged. It is further submitted that the applicant is ready to cooperate in the investigation and has also giving undertaking that the applicant will never tamper with the investigation including evidences related to it and also will never induce the informant or any other witness related to this case.
7. That the contents of para 10 and 11 of the counter affidavit filed by the opposite party needs no reply as it relates to the matter of record.
8. That the contents of para 12 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that the applicant is an innocent person and has not committed any offence as alleged. it is further submitted that as per the allegation of the demand of bribe amount, the alleged bribe amount was paid to the co accused and it has no relation to the applicant.
9. That the contents of para 13 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that the delay of lodging the impugned FIR is yet no explained by the complainant.
10. That the contents of para 14 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that no proper explanation regarding the recovery from the applicant has been produced from the investigating agency till date. It is further submitted that the bare perusal of the story narrated in the FIR, the complainant has admitted that the demand of dowry was in lieu of not to initiate any enquiry against him which clearly shows that complainant has lodged the alleged FIR only to safeguard himself from the disciplinary proceedings.
11. That the contents of para 15 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied in this regard, reply has already be given in the earlier paras and hence for the sake of brevity, it is not reiterated again.
12. That the contents of para 16 of the counter affidavit filed by the opposite party needs no reply.
13. That the contents of para 17 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that no proper grounds of arrest has been mentioned particularly for the applicant.
14. That the contents of para 18 of the counter affidavit filed by the opposite party needs no reply.
15. That the contents of para 19 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that the the applicant has only warned the complainant and has not initiated the enquiry against the complainant and hence to safeguard himself, the complainant has lodged the impugned FIR.
16. That the contents of para 20 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied in this regard, reply has already be given in the earlier paras and hence for the sake of brevity, it is not reiterated again.
17. That the contents of para 21 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that there is no explanation regarding no transaction between applicant and co accused.
18. That the contents of para 22 of the counter affidavit filed by the opposite party needs no reply.
19. That the contents of para 23 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that the applicant after standing for sone time before the Learned Remand Magistrate, suddenly fall on the ground and this incident happened when the count has in session and hence an application to refer the applicant to jail hospital was presented before the Learned Remand Magistrate and the Learned Remand Magistrate was please to allow the same.
20. That the contents of para 24 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that for the sake of brevity the contents of para 8 of this rejoinder affidavit may kindly be reiterated again.
21. That the contents of para 25 of the counter affidavit filed by the opposite party needs no reply.
22. That the contents of para 26 of the counter affidavit filed by the opposite party is wrong, misleading and hence denied and in reply thereto it is submitted that for the sake of brevity the contents of para 8 and 22 of this rejoinder affidavit may kindly be reiterated again.
23. That the contents of para 27 of the counter affidavit filed by the opposite party needs no reply.
24. That therefore, the applicant is humbly praying that for the facts, reasons and circumstances stated in the accompanying rejoinder affidavit as stated above, this hon’ble court may kindly be please to enlarge the applicant on bail, in the interest of justice.

**LUCKNOW DEPONENT**

**DATE:**

**VERIFICATION**

I, the above named deponent, do hereby verify that the contents of paragraphs no. 1 to 26 of this affidavit are true to my personal knowledge and believes. No part of it is false and nothing material has been concealed,

**So help me God**

Signed and verified on 1st day of July, 2025 at Civil Court Compound, Lucknow

**BEFORE THE HON’BLE SPECIAL JUDGE, ANTI CORRUPTION, CBI, COURT NO. 3, LUCKNOW**

C.M. Application No. of 2025

In Re:

CBI Case No. of 2025

CBI

Versus

Sanjay Kumar Singh and Anr.

Case No. RC0062025A0016

Dated 13.06.2025

Under Section 61(2) BNS and Section 7 of Prevention of Corruption Act 1988

P.S- CBI, ACB Lucknow

It is most humbly showeth as under:

1. That the applicant was arrested by CBI on 14.06.2025 from District Varanasi for the allegation of taking bribe and was presented before the Learned Remand Magistrate on 15.06.2025.
2. That the applicant has several chronic medical ailments which includes kidney transplant, blood pressure problem, diabetes, etc.
3. That an application dated 15.06.2025 was filed before the learned remand magistrate to refer the applicant to the jail hospital. The learned remand magistrate was pleased to allow the same and refer the applicant to jail hospital. Copy of the order dated 15.06.2025 is annex herewith as **ANNEXURE NO. 1**
4. That it is further relevant to mention here that on 18.06.2025, the applicant has filed an application to refer the applicant to jail hospital before this Hon’ble Court and the Hon’ble Court was pleased to allow the same and directed the jail superintendent to act accordingly. Copy of the application dated 18.06.2025 is annex herewith as **ANNEXURE NO. 2**
5. That the applicant further mentions that the due to poor health condition of the applicant, the medical checkup of the applicant was conducted on 18.06.2025.
6. That the health condition of the applicant is deteriorating day by day and the applicant is unable to get proper medical treatment in jail hospital.
7. That for the better medical treatment, it is utmost important to transfer the applicant to any government hospital i.e., KGMU or PGI so that the proper treatment of the applicant can be done.

Therefore, the applicant humbly prays before this Hon’ble Court to kindly refer/ transfer the applicant to any government/ private hospital for proper treatment.

Date: Applicant

Place: (Through Advocate)

Arpan Prakash Srivastava

(Adv.)

AOR- B/A-2718

Reg: UP5773/ 2020

Mob: 8400231200

(Counsel for the applicant)

**BEFORE THE HON’BLE SPECIAL JUDGE, ANTI CORRUPTION, CBI, COURT NO. 3, LUCKNOW**

C.M. Application No. of 2025

In Re:

CBI Case No. of 2025

CBI

Versus

Sanjay Kumar Singh and Anr.

Case No. RC0062025A0016

Dated 13.06.2025

Under Section 61(2) BNS and Section 7 of Prevention of Corruption Act 1988

P.S- CBI, ACB Lucknow

I, **Ruby Singh,** aged about 49 years Wife of Sanjay Kumar Singh Resident of D- 205/2, Phulawaria, Near 39, GTC Firing Range Gate, Chandpur District Varanasi Pin 221106, Qualification- literate Occupation- Home Maker, the deponent do hereby solemnly affirm and state on oath as under:-

1. That the deponent is the wife of the applicant / accused and doing pairvi of the above mentioned bail application on behalf of him as such she is fully conversant with the facts and circumstances of the case deposed herein under.
2. That the applicant was arrested by CBI on 14.06.2025 from District Varanasi for the allegation of taking bribe and was presented before the Learned Remand Magistrate on 15.06.2025.
3. That the applicant has several chronic medical ailments which includes kidney transplant, blood pressure problem, diabetes, etc.
4. That an application dated 15.06.2025 was filed before the learned remand magistrate to refer the applicant to the jail hospital. The learned remand magistrate was pleased to allow the same and refer the applicant to jail hospital.
5. That it is further relevant to mention here that on 18.06.2025, the applicant has filed an application to refer the applicant to jail hospital before this Hon’ble Court and the Hon’ble Court was pleased to allow the same and directed the jail superintendent to act accordingly.
6. That the applicant further mentions that the due to poor health condition of the applicant, the medical checkup of the applicant was conducted on 18.06.2025.
7. That the health condition of the applicant is deteriorating day by day and the applicant is unable to get proper medical treatment in jail hospital.
8. That for the better medical treatment, it is utmost important to transfer the applicant to any government hospital i.e., KGMU or PGI so that the proper treatment of the applicant can be done.

**LUCKNOW DEPONENT**

**DATE:**

**VERIFICATION**

I, the above named deponent, do hereby verify that the contents of paragraphs no. 1 to 8 of this affidavit are true to my personal knowledge and believes. No part of it is false and nothing material has been concealed,

**So help me God**

Signed and verified on 16th day of July, 2025 at Civil Court Compound, Lucknow

**BEFORE THE HON’BLE SPECIAL JUDGE, ANTI CORRUPTION, CBI, COURT NO. 3, LUCKNOW**

C.M. Application No. of 2025

In Re:

CBI Case No. of 2025

CBI

Versus

Sanjay Kumar Singh and Anr.



