

IN THE COURT OF THE SESSIONS JUDGE,

PUNE, MAHARASHTRA, INDIA

Petitioner: Mr. Sunil Desai

Respondent: Mr. Rajesh Sharma, son of Ramesh Sharma,

Residing at Flat No. 204, Green Residency, Pune

Summary of the Case:

1. This is a petition under Section 482 of the Code of Criminal Procedure (CrPC) seeking the issuance of directions to the learned Judicial Magistrate, First Class, Pune, to take cognizance of the offences under Indian Penal Code (IPC) sections 420, 465, 467, 468, 471, and 120B, based on the police chargesheet no. 112/2023 dated 05-06-2023, filed by the Shivajinagar Police Station, Pune.
2. The respondent, Mr. Rajesh Sharma, is accused of forging the PAN card, Aadhaar card, and salary documents of the petitioner, Mr. Sunil Desai, to fraudulently secure a personal loan of Rs. 5,00,000 from XYZ Bank, Pune.
3. Investigation revealed the use of falsified documents and impersonation, and forensic document analysis confirmed tampering and duplication.

Legal Grounds and Arguments:

1. The police chargesheet, filed under the aforementioned sections of IPC, discloses a prima facie case against the respondent, warranting the court's cognizance.
2. The respondent has committed forgery and cheating to obtain a bank loan fraudulently, causing financial loss to the petitioner and damaging the petitioner's reputation.
3. The respondent's actions are in contravention of the provisions of the Indian Penal Code and are punishable under Sections 420, 465, 467, 468, 471, and 120B of the said Code.
4. The petitioner, being the aggrieved party, is entitled to seek justice and have the respondent prosecuted for the offences committed.

Prayer / Relief Sought:

1. It is, therefore, prayed that this Hon'ble Court may be pleased to issue directions to the learned Judicial Magistrate, First Class, Pune, to take cognizance of the offences under IPC sections 420, 465, 467, 468, 471, and 120B, based on the police chargesheet no. 112/2023 dated 05-06-2023, filed by the Shivajinagar Police Station, Pune, against the respondent.
2. The respondent be tried in accordance with the law and be awarded appropriate punishment if found guilty.

Petitioner's Signature:

Mr. Sunil Desai

Date: 10-06-2023

Note: The above petition is a sample and should be verified by a qualified legal practitioner before submission to the court. The petitioner is advised to seek legal advice and assistance.

istance to ensure the accuracy and completeness of the petition.