

IN THE COURT OF THE SESSIONS JUDGE,
PUNE, MAHARASHTRA

Bail Application Under Section 439 of Cr.P.C.

APPLICANT: Mr. Rajesh Sharma

RESPONDENT: State of Maharashtra

CASE DETAILS AND FIR No.:

connected with FIR No. 112/2023 of Shivajinagar Police Station, Pune

BACKGROUND AND FACTS:

It is respectfully submitted that the applicant, Mr. Rajesh Sharma, has been falsely implicated in the aforementioned case and has been charged under various sections of the Indian Penal Code (IPC) for the alleged offence of forgery and cheating to obtain a bank loan fraudulently. The case pertains to the accused individual, Mr. Rajesh Sharma, who is alleged to have forged the Permanent Account Number (PAN) card, Aadhaar card, and salary documents of Mr. Sunil Desai in order to fraudulently secure a personal loan of Rs. 5,00,000 from XYZ Bank, Pune.

GROUND FOR BAIL:

The applicant humbly submits the following grounds for bail:

1. The applicant has deep roots in the community and is not a flight risk. He has been a law-abiding citizen with no prior criminal record.
2. The applicant has cooperated fully with the investigation and has no intention of obstructing the legal process in any way.
3. The evidence against the applicant is primarily documentary and can be adequately addressed during the trial.
4. The applicant's continued detention is not necessary for the purpose of ensuring his presence during the trial.
5. The applicant has a constitutional right to be released on bail, subject to reasonable conditions, as per Section 439 of the Code of Criminal Procedure (Cr.P.C.).

LEGAL ARGUMENTS WITH IPC SECTIONS:

The applicant respectfully submits that the charges against him are bailable in nature, as per Sections 420, 465, 467, 468, 471, and 120B of the Indian Penal Code (IPC). The applicant's right to bail is further strengthened by the fact that he is a first-time offender and has no prior criminal record.

PRAYER:

In light of the aforementioned grounds and legal arguments, it is respectfully prayed that the applicant, Mr. Rajesh Sharma, be released on bail, subject to reasonable conditions, as per Section 439 of the Code of Criminal Procedure (Cr.P.C.).

Place: Pune, Maharashtra

Date: [To be filled by the applicant]

Signature of the Applicant: [To be filled by the applicant]

Advocate for the Applicant: [To be filled by the applicant's lawyer]