

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, registered at Shivajinagar Police Station, Pune, Maharashtra

BACKGROUND AND FACTS:

1. The applicant, Mr. Rajesh Sharma, has been accused under various sections of the Indian Penal Code (IPC) in a forgery case concerning a bank loan, as detailed in the chargesheet submitted by Shivajinagar Police Station, Pune.
2. It is alleged that the applicant forged the PAN card, Aadhaar card, and salary documents of Mr. Sunil Desai to fraudulently secure a personal loan of Rs. 5,00,000 from XYZ Bank, Pune.
3. The investigation conducted by the police revealed the use of falsified documents and impersonation, which were confirmed through forensic document analysis, indicating tampering and duplication.

GROUND FOR BAIL:

1. The applicant is a law-abiding citizen with strong ties to the community, having resided at Flat No. 204, Green Residency, Pune, for several years.
2. The applicant has cooperated with the investigation and is prepared to abide by any conditions that the court may impose, including regular attendance at court hearings.
3. The applicant has no prior criminal record, and the present offense is bailable in nature.
4. Considering the nature of the offense, the applicant's limited role in the alleged forgery, and the fact that he does not pose a flight risk, bail should be granted.

LEGAL ARGUMENTS WITH IPC SECTIONS:

1. The applicant is charged under IPC Sections 420, 465, 467, 468, 471, and 120B. However, the grounds for bail do not depend on the merits of the case or the accused's guilt.
2. The purpose of bail is to ensure the presence of the accused at trial. The applicant's strong ties to the community and his willingness to cooperate with the investigation demonstrate that he is not a flight risk.

PRAYER:

It is, therefore, prayed that the applicant, Mr. Rajesh Sharma, be granted bail under Section 439 of the Cr.P.C. on such terms and conditions as this Hon'ble Court may deem fit.

Date:

[Name of the Applicant]

Mr. Rajesh Sharma
Flat No. 204, Green Residency,
Pune, Maharashtra

Advocate for the Applicant:

[Your Name]
[Your Address]
[Your Contact Details]