

**BEFORE THE HIGH COURT AT \_\_\_\_\_**

**IN THE MATTER OF:**

STATE

VS

\_\_\_\_\_

(FIR Number: \_\_\_\_\_)

Under Section: (\_\_\_\_\_)

Police Station: (\_\_\_\_\_)

**APPLICATION U/S 438 CRPC FOR GRANT OF ANTICIPATORY BAIL ON BEHALF OF THE ACCUSED (name  
of the applicant of the bail)**

**MOST RESPECTFULLY SUBMITTED AS UNDER:**

1. That the present FIR has been registered on false and bogus facts. The facts stated in the FIR are fabricated, concocted and without any basis.
2. That the police has falsely implicated the applicant in the present case, the applicant is a respectable citizen of the society and is not involved in any criminal case.
3. That the facts stated in the complainant against the applicant are civil disputes and does not constitute any criminal offense at all.
4. That the applicant is not required in any kind of investigation nor any kind of custodial interrogation is required.
5. That the applicant is having very good antecedents, he belongs to a good family and there is no criminal case pending against them.

6. That the applicant is a permanent resident and there are no chances of his absconding from the course of justice.

7. That the applicant undertakes to present himself before the police/court as and when directed.

8. That the applicant undertakes that he will not, directly or indirectly make any inducement, threat or promise to any person acquainted with the facts of the case so as to dissuade him from disclosing such facts to the Court or to any police officer.

9. That the applicant further undertakes not to tamper with the evidence or the witnesses in any manner.

10. That the applicant shall not leave India without the previous permission of the Court.

11. That the applicant is ready and willing to accept any other conditions as may be imposed by the Court or the police in connection with the case.

12. That the Court below has failed to consider all the facts and circumstances of the case and has wrongly dismissed the anticipatory bail application.

#### **PRAYER**

It is therefore prayed that the court may direct the release the applicant on bail in the event of his arrest by the police.

Any other order which the court may deem fit and proper in the facts and circumstances of the case may be also passed in favor of the applicant.

APPLICANT

THROUGH

COUNSEL