

IN THE HIGH COURT OF JUDICATURE FOR RAJASTHAN

BENCH AT JAIPUR.

S.B.Criminal Misc. Bail Application No. /2026

NameAgeyears Son of
.....R/O.....,District.....

--Accused-Petitioner

Versus

1. State of Rajasthan

-----Respondent

2.

----Complainant--Respondent

S.B. Criminal Misc. Bail Application under Section 482 of
BNSS (Bhartiya Nagarik Surkasha Sanhita) in FIR No.....
/2024 dated 00.00.2024 registered at Police Station.....,
offence under sectionagainst the order dated
00.00.2024 Passed by Hon'bleJudge no.....,,
Rajasthan

under sectionsin Bail Application no.../2024.

To,

The Hon'ble Chief Justice and his other Companion
Judges of the Hon'ble High Court of Judicature for
Rajasthan Bench at Jaipur.

MAY IT PLEASE YOUR LORDSHIPS;

The humble petitioner most respectfully begs to submit as
under: -(FACTS)

1. That on the basis of a report filedson of....., age
.....years, resident of....., Police Station.....,
Rajasthan, registered F.I.R. No. /2024 dated
00.00.2024 for the offence u/s Section....., that the
alleged incidence took place on 00.00.2024 and in this
report the complainant alleged that
.....The copy of the F.I.R. No.
...../2023 is submitted herewith and marked as
Annexure-1.

2. That the petitioner moved a bail application before the
learnedvide its order dated 00/ 00/ 2024
whereby bail application of the petitioner was dismissed
without considering the facts and circumstances of the

case. The certified copy of the order dated 00/ 00/ 2024 is submitted herewith and marked as **Annexure-2**.

GROUNDS

- A.** Because The accused has a reasonable apprehension of arrest based on specific allegations that have been made against him. While the nature of these allegations may appear serious, they stem from misunderstandings surrounding the incident. The accused has maintained a clean record throughout his life and has never been involved in criminal activities. His reputation in the community is exemplary, and he possesses no prior history of wrongdoing that would indicate a propensity for criminal behavior. It is imperative for the court to evaluate the facts carefully rather than rely solely on the allegations presented by the complainant.
- B.** Because The accused is not a flight risk. He has strong ties to the community, including family and professional responsibilities that anchor him to his residence. Having resided at the same address for many years demonstrates his stability and commitment to fulfilling his obligations. The accused is fully prepared to cooperate with the investigative process and has no intention of evading the law. To further assure the court of his

compliance, he is willing to provide any additional information required by law enforcement and make himself available for questioning as necessary.

C. Because Substantial grounds exist to believe that the accusations against the accused may be false or exaggerated. It appears that the complainant may have motives unrelated to the actual facts of the case, possibly driven by personal animosity or ulterior motives. The accused intends to present evidence highlighting inconsistencies in the complainant's statements and demonstrating the lack of credibility in their allegations. This context is crucial as it underscores the potential for wrongful detention based on unsubstantiated claims rather than solid evidence.

D. Because The case against the accused lacks substantive evidence, making the likelihood of conviction minimal. The prosecution appears to rely heavily on hearsay and conjecture rather than tangible proof of wrongdoing. The absence of strong evidence not only supports the request for anticipatory bail but also reinforces the principle that individuals should not be subjected to pre-trial detention without sufficient grounds. The constitutional right to liberty must be protected, particularly in a scenario where the prosecution has not demonstrated a clear and compelling case.

- E.** Because The accused is committed to adhering to any conditions that the court may impose upon granting bail. This may include regular check-ins with law enforcement, restrictions on travel, or any other conditions deemed appropriate by the court. His willingness to comply with such conditions illustrates respect for the legal process and a commitment to ensuring that the investigation can proceed without disruption.
- F.** Because The accused has demonstrated a commitment to legal compliance and has no intention of interfering with the investigation. He has always cooperated with law enforcement in previous matters and is willing to voluntarily submit to any questioning or investigation required by the authorities. This willingness to cooperate further underscores the lack of any intent to evade justice or obstruct the legal process.
- G.** Because The allegations against the accused may have arisen from a misunderstanding or misinterpretation of events. There is a possibility that the complainant has misconstrued the accused's actions or statements, leading to the false belief that a criminal offense has occurred. The accused is prepared to provide clarifying evidence and witnesses who can corroborate his version of events, thereby illuminating the context of the situation and dispelling any doubts regarding his conduct.

H. Because The complainant's motives in bringing forward these allegations warrant scrutiny. It is essential to consider whether the accusations are influenced by personal vendettas or motivations that are unrelated to the truth of the matter. If it can be shown that the complainant has a history of making false accusations or has been involved in similar disputes in the past, this could significantly weaken the prosecution's case and support the request for anticipatory bail.

I. Because The mental and emotional state of the accused should also be considered in the context of this application. Subjecting him to arrest and subsequent incarceration would cause significant psychological distress and harm, particularly given the unsubstantiated nature of the allegations. The impact of pre-trial detention on the accused's mental health is a legitimate concern and should be weighed against the potential need for the accused to remain free while the legal process unfolds.

J. Because The accused's employment status and financial obligations are additional factors that support the request for anticipatory bail. He holds a responsible position that requires his presence and active participation in the workplace. Arresting the accused would not only jeopardize his employment but also negatively affect the livelihoods of those who depend on him. Ensuring that he can continue to fulfill his professional

responsibilities while engaging with the legal process is a compelling reason to grant bail.

K. That there is no chances of tempering with the prosecution witnesses as they are interested witnesses.

L. That the petitioner is ready and willing to abide all such conditions which would be imposed by this Hon'ble Court at the time of passing the order.

M. That other grounds would be urged at the time of hearing.

PRAYER

In view of the above cogent facts and circumstances of the case, It is most humbly prayed That your lordship may kindly grant indulgence of Anticipatory bail to the petitioner under section 482 BNSS in FIR No. 00/ 2023 registered at Police Station....., offence under section

The humble petitioner
through counsel

(Advocate)

Enroll No. R/-----/1999
Email : abc@yahoo.com
Mob. No. : 7734051664

Notes:-

- 1- No such bail application has been filed prior before this Hon'ble High Court.
- 2- A copy of this application has been given to P.P.
- 2- As pie papers were not readily available, it has been typed on stout papers by private steno in my office.
- 3- The matter pertains to Jurisdiction of High Court Bench at Jaipur.

Place: Jaipur

Dated:

counsel for the petitioner

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.....Vs. State of Rajasthan

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Documents

Annex.1: Copy of FIR dated 00/ 00/ 2024

Annex.2: Certified copy of order Dated 00/ 00/ 2024

Counsel for the petitioner

IN THE HIGH COURT OF JUDICATURE FOR RAJASTHAN

BENCH AT JAIPUR.

S.B.Criminal Misc. Bail Application No.____/2023

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SYNOPSIS

1. That on the basis of a report filed by....., ageyears, resident OF, Police Station.....,, Rajasthan registered F.I.R.No. /2023 dated 00/ 00/ 2024 for the offence u/s Section, that the alleged incidence took place on 00/ 00/ 2024 and in this report the

2.

Counsel for the petitioner