**Application for Anticipatory Bail before High Court**

In the High Court at Allahabad

(Criminal Miscellaneous Jurisdiction)

In the matter of an Application for anticipatory bail under section 439, Cr PC

AB son of MN residing at …………………, …………………………. Petitioner

versus

The State ……………… Respondent

To

The Hon’ble Mr. ……...……………………  
Chief Justice and His Companion Justices of the said Hon’ble Court

The humble petition of AB, the petitioner above-named

MOST RESPECTFULLY SHEWETH:

1…….That the petitioner is a reputed businessman having a long-standing business in Mumbai and is an income-tax and sales-tax assessee.

2……..That the petitioner has his permanent residence in Mumbai.

3…….That due to business rivalry, his business rival, Z Co. Ltd., lodged a false complaint against the petitioner before the police alleging cheating and forgery.

4………That the intention of the de facto complaint is only to harass and humiliate the applicant and to tarnish his clean image in business circle.

5……..Your petitioner apprehends that pursuant to the said complaint the police may arrest your petitioner and thereby put the petitioner to harassment and mental agony and physical inconvenience.

6………That the petitioner undertakes to abide by all the terms and conditions that may be imposed upon him in the order of bail.

7…………That if the anticipatory bail is not granted the petitioner shall suffer irreparable injury.

8…………..That the application is made bona fide and in the interest of justice.

In the circumstances the petitioner humbly prays that Your Lordships may be graciously pleased to direct that in the event of the petitioner being arrested in connection of this case the petitioner will be released on bail forthwith and/or may pass such other order or orders as Your Lordships may deem fit and proper.

And your petitioner as in duty bound, shall ever pray.

Advocate of AB Sd. AB

**Verification**

I ……………………, AB ………………………, son of MN………………, by occupation business, residing at …………………, Mumbai ……………… do hereby solemnly affirm and say as follows:

1……..I am the petitioner above-named. I know the facts of this case and I am able to depose thereto.

2…….The statements in paragraphs 1 to 8 in the foregoing petition are true to my knowledge and belief.

3…….I sign this verification on the 11th day of June 2010 in Mumbai.

Solemnly affirmed by the said AB on 11th day of June 2010 in the Court House at Mumbai.

Before me Sd. AB

Commissioner