**Criminal Complaint u/s 500 & 506 r/w sec. 34 of the Indian penal code**

**IN THE COURT OF THE JUDICIAL MAGISTRATE, FIRST CLASS, (COURT NO. 4), MUMBAI AT MUMBAI**

Criminal Complaint No. /2010\_

Shri \_\_ B \_\_ A \_\_ R , )

age 45 years, occupation - service, ) Complainant

resident of 77 Fountain, )

MUMBAI 400001.
Versus

1.Smt. \_ R\_\_ A \_ B \_,
age 35 years, occupation - service,

2.Shri A \_\_ B R , ) Accused

age 40 years, occupation - service, )

both residents of 23, Janma Bhoomi, )

MUMBAI 400001. )

A COMPLAINT U/SS 500 & 506 R/W SEC. 34 OF THE INDIAN PENAL CODE

The complainant above-named submits this complaint, praying to state as follows:

1. That the complainant has been in service of the Technical Education Department since the last twenty-five years, and is, at present, working as an Assistant Professor of Mechanical Engineering at the Government Polytechnic, MUMBAI, for the last ten years.

2. That the accused No. 1, who is the first wife of the accused No. 2, is also in the service of the said Technical Education Department and is now working as a Lecturer in Physics, while the accused No. 2 is working as an Administrative Officer at the Sassoon General Hospitals, MUMBAI.

3. That as a colleague of this complainant at the said institute, the accused No. 1 also used to visit the residence of the complainant and his family occasionally and thereby developed domestic intimacy with them.

4. That subsequently, when the accused No. 2 contracted a second marriage with one, Miss Jaya, who is also working at the Sassoon General Hospitals, MUMBAI, as a Staff Nurse, the accused No. 1 started to narrate to this complainant and other colleagues in their institute the new stories and the indifferences then being developed between both the accused, and also unnecessarily expected the complainant to take interest in the same and to do something on her behalf and in her favour, but taking into consideration the very nature of such family affairs, the complainant refused to interfere with the same and paid no heed to what the accused No. 1 was then saying to him, which rightly or wrongly offended the accused No. 1, and this has resulted into difference of opinions for no fault on the part of the complainant.

5. That as a result of such an indifferent behaviour on the part of the accused No. 1, she made a false complaint to the Principal of the institute and also to the police, alleging that the complainant teased her, and when there was an enquiry made in the matter, it was found that there was no substance in the said complaint, and similar were the findings of the police investigation also.

6. That during the period of the last six months or so, the accused No. 1 with common intention of the accused No. 2 wrote five anonymous letters to the complainant with intimidating and obscene language to the effect that his ten-year old daughter will be kidnapped, raped and murdered.

7. That the complainant accordingly reported the matter to the police, and from their preliminary investigations, it was revealed that those anonymous letters have been written or caused to be written by the accused No. 1 with common intention and in league with the accused No. 2.

8. That on account of these threatening letters and false, fabricated, imaginary, baseless and defamatory allegations made by the accused, the complainant and the whole of his family have been defamed and are also under constant tensions and tortures, and they apprehend that the accused may further indulge into such criminal activities and cause danger to the family of the complainant.

9. That this complainant also submits that all such illegal activities indulged into by the accused have threatened the security of the family of this complainant as a whole, and hence, it has become necessary for the complainant to book the accused and file this complaint against them.

10. That the cause of action for this complaint first arose on……, and has since then been arising every day thereafter, and hence, this complaint filed today is well within limitation.

11. That the offence has been committed within the local limits of the jurisdiction of this Court, and hence, this Hon'ble Court has jurisdiction to try and decide this complaint.

12. That the necessary court-fee is paid herewith.

13. That the complainant, therefore, prays that the accused be kindly charged with and tried for the offence punishable u/ss 500 & 506 R/W Sec. 34 of the Indian Penal Code and punished according to law.

MUMBAI, Sd/- BAR

COMPLAINANT

Dated:…………………….

Sd/- xXx

ADVOCATE FOR COMPLAINANT

**VERIFICATION**

I, Shri BAR, the present complainant, do hereby state on solemn affirmation that the contents of this complaint in paras 1 to 13 are true and correct to the best of my knowledge and belief, and so I have signed hereunder.

Sd/- BAR COMPLAINANT