**Criminal Complaint u/ss 323, 324, 504 & 506 r/w sec 34 of the Indian penal code**

**IN THE COURT OF THE JUDICIAL MAGISTRATE, FIRST CLASS, (COURT NO. 2), MUMBAI AT MUMBAI**

Criminal Complaint No. Shri \_\_ D \_ M \_\_ K \_, )

age 35 years, occupation - service, ) Complainant

resident of 1000 ……………., )

MUMBAI 400 011. )
Versus

Shri \_ B \_\_ J \_ P \_\_, )
age 56 years, occupation - business, )

Shri \_\_ S \_\_ B \_\_ P \_\_, ) Accused
age 25 years, occupation - business, )

both residents of 1050 ……….., )

MUMBAI 400001. )

A COMPLAINT U/SS 323, 324, 504 & 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 is a resident of the within mentioned address, and the said house property is owned by the accused No. 1 and let out to this complainant as a monthly tenant.

2. That the complainant is a Government servant, peace-lover and law- abiding citizen.

3. That in the month of 2010 the accused No. 1 called upon this complainant to vacate the said premises within a week or so.

4. That since this complainant did not vacate the said premises, the accused No. 1 then again on….., the son of the accused No. 1, i.e. the accused No. 2, came to the complainant and threatened him of the dire consequences, if the complainant, if the complainant were to fail or avoid to vacate the said premises before the end of….2010…..

5. That the complainant submits that he did not vacate the said premises, and he was not legally bound to do so.

6. That then, on….., at 6.30 p.m., when this complainant had been returning from his office to his residence, while he was entering the said premises, both the accused accosted the complainant and started abusing him in a dirty and filthy language, and even though the complainant tried to convince and tell them that what they were doing was all illegal, both the accused attacked the complainant and gave him a number of blows with fists and lastly the accused No. 2 gave a severe blow with a cudgel/staff/ stick in his hand on the forehead of this complainant and thereby caused a serious injury to the complainant, and the complainant had also become unconscious.

7. That when the people staying in the neighbourhood gathered there, the accused stopped beating and they both went away, announcing and pronouncing a threat that if the Complainant were to fail to vacate the said premises within a couple of days, he would be killed, and hence, this complaint.

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

9. 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.

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

11. That the complainant, therefore, prays that the accused be kindly charged with and tried for the offence punishable u/ss 323, 324, 504 and 506 R/W Sec. 34 of the Indian Penal Code and punished according to law.

MUMBAI, Sd/- DMK

COMPLAINANT
Dated: .

Sd/- x X x ADVOCATE FOR COMPLAINANT

**VERIFICATION**

I, Shri DMK, the present complainant, do hereby state on solemn affirmation that the contents of this complaint in paras 1 to 11 are true and correct to the best of my knowledge and belief, and so I have signed hereunder.

Sd/- DMK COMPLAINANT