**Criminal complaint u/s 498a r/w sec. 34 of the Indian Penal code**

**IN THE COURT OF THE JUDICIAL MAGISTRATE, FIRST CLASS, (COURT NO. 9), MUMBAI AT MUMBAI**

Criminal Complaint No. /200\_

Smt. \_\_ S \_\_ A \_ D\_\_, )

age 25 years, occupation - service, ) Complainant

resident of C/o Shri DAD, 75 Vikhroli, )

MUMBAI 400 011. )  
Versus

1. Shri \_\_ M \_\_ A \_\_ D \_, )  
age 30 years, occupation - business, )

2. Smt. B A D , ) Accused

age 55 years, occupation - household, )

both residents of 150 Mazagaon, )

MUMBAI 400 007. )

A complaint u/s 498-a 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 the legally wedded wife of the accused No. 1, and the accused No. 2 is the mother of the latter.

2. That the complainant was married to the accused No. 1 at MUMBAI on according to the Hindu religion, vaidic rites and ceremonies.

3. That before the marriage, the complainant was known by her maiden name as Kumari Jaya Ramchandra..

4. That in the celebration of the said marriage, the parents of this complainant did everything without requiring the accused to spend anything on any account, and even though the father of this complainant is from mediocrity, all the customary gifts and presents were given to the accused and their near relations.

5. That since the complainant had been in Government service, she had her own savings, and after the marriage, she had kept the same for herself at her matrimonial home.

6. That on the second day immediately after the marriage, when the complainant and the accused No. 1 had been Mahableshwar for honeymoon, this complainant was shocked to know and accept it as a truth that the accused No. 1 is alcoholic, and he is a man of many vices.

7. That when, after return from Mahableshwar, this complainant complained to the accused No. 2 about the misbehaviour on the part of the accused No. 1, she paid no heed to the same, and it took no time for this complainant to realise that the accused No. 1 being the only son and scion of her in-laws, the accused No. 2 cosseted him like anything and further that the accused No. 2 would not allow this complainant to say anything against him or both of them.

8. That whenever the complainant tried to open her month about the indifferent attitude and misbehaviour on the part of the accused No. 1, both the accused to ill-treat the complainant and the accused No. 1 with common intention of the accused No. 2 had been creating heavy mental tensions and subjecting this complainant to suffer excruciating mental and physical tortures and misery for no fault of hers.

9. That the accused did not allow this complainant to go to her parents', and on many occasions, this complainant was starved by them, and she was also not allowed to talk to neighbours.

10. That it is respectfully submitted for the kind information of this Hon'ble Court that this complainant and her parents tried their best to improve upon the misbehaviour of the accused No. 1 by requesting the accused No. 2 to do something with a view to bringing about, at least, some improvement, but unfortunately, nothing of this sort could happen, and both the accused, instead of responding positively, started to behave still differently and ultimately reached a loose end of their future.

11. That this complainant also submits that she being educated, cultured and of a respectable clan, she has made all sincere, devout and fervent efforts in this respect, but she is so unfortunate that she has come to the final conclusion that now nothing could be done in the matter.

12. That on …. and ………... 2010, this complainant was confined to a dark cell in the house, and she Was given no food and even no water, and the accused had not only beaten the complainant up but also subjected her to mental as well as physical cruelty in an inhuman manner.

13. That since it has become totally and practically difficult for this complainant to stay on further with the accused, she was compelled to go to her parents' and stay there against her and also their wish.

14. 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.

15. 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.

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

17. That the complainant, therefore, prays that the accused be kindly charged with and tried for the offence punishable u/s 498-A R/W Sec. 34 of the Indian Penal Code and punished according to law.

MUMBAI, Sd/- SAD

COMPLAINANT

Dated :………...

Sd/- x Xx ADVOCATE FOR COMPLAINANT

**VERIFICATION**

I, Smt. SAD, the present complainant, do hereby state on solemn affirmation that the contents of this complaint in paras 1 to 17 are true and correct to the best of my knowledge and belief, and so I have signed hereunder.

Sd/- SAD COMPLAINANT