IN THE COURT OF THE I ADDL. DISTRICT & SESSIONS JUDGE AT (SPECIAL JUDGE FOR N.D.P.S.CASES)

Crl.M.P.No. of 20 in Cr. No. of 20 of P.S.

Between:-

---Petitioner/Accused No.

And

The State of through S.H.O., P.S.

---Respondent/Complainant

CHARGE UNDER SEC.20(b) R/W 8(b)OF N.D.P.S.ACT, 1985 PETITION FILED U/SEC.439 OF Cr.P.C

The petitioner humbly submits as under:-

- 1. The petitioner is the alleged Accused in the above crime. The petitioner did not commit the alleged offence or any other offence whatsoever. The Respondent Police have falsely implicated the petitioner in the above crime at the instance of some interested persons in order to harass him.
- 2. The petitioner was remanded to Judicial Custody on -20 by the Judicial First Class Magistrate at . Since then the petitioner is in Judicial Custody.
- 3. The allegation of the prosecution is that, on reliable information the Police Excise raided the agricultural fields of petitioner and they found Ganja Plants from the field of the petitioner/found Kgs., of dry ganja from the possession of the petitioner and seized the same under a cover of panchanama. But, the above allegations are utterly false and incorrect, hence denied by the petitioner. The petitioner never cultivated/possession of said ganja and he has no way concern with the alleged Ganja Plants.
- 4. The petitioner is the agriculturist and depending upon the agricultural income. The petitioner is only earning member of his entire family. If the petitioner is not enlarged on bail his entire family members will be put into great hardship.
- 5. The petitioner is a law abiding citizen and he will not avoid the due process of laws. The petitioner is ready to abide by the conditions if any imposed by the Hon'ble Court.
- 6. The petitioner is ready to furnish sureties as ordered by the Hon'ble Court.
- 7. This is the first bail petition filed by the petitioner and no other bail petition is filed or pending in any other Court including the Hon'ble High Court of

It is therefore, prayed that the Hon'ble Court may be pleased to enlarge the petitioner on bail, pending trial, in the interest of justice.

Date:- - -20 Advocate for the Petitioner.

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FILED ON:- - -20

FILED BY:-

ADVOCATE