

**IN THE HONOURABLE COURT OF LEARNED CHIEF JUDICIAL.
MAGISTRATE,**

Complaint No. _____ of 2022.

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...

.....Complainant.

VERSUS.

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.....Accused.

**CRIMINAL COMPLAINT UNDER SECTION 156(3) OF Cr.P.C. 1973 FOR
SEEKING DIRECTION FOR REGISTRATION OF FIR U/S
148,149,323,341,406,384,289,441,452, 506 and 120B of IPC.**

Sir,

The Complainant respectfully submits as Under:-

1. That the complainant is Law abiding simpleton Senior Citizen of India and he is permanent resident of above said address.

2. That accused no.1 and 2 are real son and daughter-in-law of the complainant. The accused no.1 and 2 are very

cunning and mischievous persons and they ever tried to harass, beat and humiliate the complainant and his wife.

3. That the complainant along with his wife is residing in his house. Due to the act and conduct of accused, the complainant disowned the accused no.1 and 2 from his property on by publishing in

4. That accused no.1 and 2 have forcefully committed house trespass in the house of complainant and started living in the accommodation at first floor of the house of the complainant. The accused no.1 and 2 used to beat the complainant and his wife on some small talks and when the neighbours came to rescue the complainant and his wife, the accused no.1 and 2 threatened to falsely implicate in false rape cases.

5. That on,, brother of complainant, nephew and accused no.1 were sitting in the room of complainant to pacify the dispute between the accused no.1 and complainant. In the meantime, accused no.2 came and started abusing all of them. When accused tried to keep accused no.2 mum, accused no.2 made a complaint to police control room. Police came and took accused to police station and also asked all of them to come to police station. All the above said persons reached police station.

Accused no.2 to 5 also reached the police station, where accused persons in conspiracy with each other in order to extort money from the complainant and to get transferred a plot in favour of accused no.2, have moved application against the complainant, his wife and daughter.

6. That on, all the persons were called in the police station, where accused persons in conspiracy with each other threatened the complainant to pay Rs...../- and a plot of 100 sq. yards to accused no.1 and 2 otherwise the complainant would be falsely implicated in a false rape case. In the police station, due to fear of false case and threatening raised by the accused persons, the complainant issued a cheque of Rs...../- to the accused persons, which was encashed in the account of accused no.1 and thereafter, accused no.2 withdraw her complaint in the police station against the complainant side.

7. That the accused persons again started pressurizing and threatening the complainant to transfer the plot of 100 sq yards. Accused no.2 belongs to Mewat area and is related to bad elements and he has threatened the complainant to murder him at any time and no clue would be left.

8. That about one months ago, the accused no.1 and 2 started quarrelling with the complainant and when the complainant told why the accused no.1 and 2 are not left the complainant and his wife at their mercy, the accused no.1 and 2 gave merciless beatings to the complainant and his wife. Thereafter, accused no.1 and 2 called accused no 3 to 5 and after coming on accused no.3 to 5, all the accused persons in prosecution of their common object to cause hurt to the life of complainant and his wife, came to the room of the complainant and started abusing them in a very filthy language.

9. That due to fear to their life, the complainant and his wife shut down the door of their room but the accused persons forcefully broke the door of the room of the complainant and committed trespass in the room of the complainant and they started beating the complainant and his wife. The accused no.2 instigated the other accused persons that till the complainant has not transferred the plot of 100 sq. yards, they would be continued to be beaten and they would not be left alive today and to finish their life, so no hurdle would remain in their way.

10. That the complainant and his wife being beaten by the accused persons and when they raised alarm, some

neighbours came and rescued the complainant and his wife from the clutches of the accused. When leaving the spot, the accused persons gave threatening to the complainant and his wife that they would be finished if any complaint was made against them or if the plot is not transferred in the name of accused no.1 and 2.

11. That the complainant visited to the police of Police Station Sushant Lok and moved an application against the accused and requested the police to take action against the accused, but the police not take any action against the accused persons till now, hence this complaint.

12. That the complainant resides and offence taken places at village Kanhai, P.S. Sushant Lok, within the territorial jurisdiction of this Hon'ble Court, so this Hon'ble Court has got jurisdiction to try the present complaint.

13. That a fixed court fee of Rs.10/- has been paid on the complaint.

It is, therefore, prayed that the present complaint may kindly be sent to SHO Police Station Sushant Lok under Section 156(3) Cr.P.C. for registration of the case against the accused or the accused may kindly be summoned for the commission of offence punishable under

section 148,149,323,341,406,384,289,441, 452 and 506 and 120-B of IPC and be punished accordingly.

Dated

LIST OF WITNESSES.

COMPLAINANT.

1. Complainant himself.
3. Clerk from the office
Off Commissioner of Police
..... alongwith record of
Application dated filed by
Complainant.
4. Any other witness court permits.

Through Counsel

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