**Criminal Complaint after legal Notice**

IN THE COURT OF HON’BLE ILLAKA MAGISTRATE/JMIC, \_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_ son of \_\_\_\_\_\_\_\_\_\_\_,
resident of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
…COMPLAINANT.
VERSUS

Mr. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
…..ACCUSED.

Criminal Complaint Under Section \_\_\_ of \_\_\_\_\_\_\_\_ & Under Section \_\_\_ I.P.C.

P.S.: \_\_\_\_\_\_\_\_\_\_\_\_\_\_
Sir,
The complainant most respectfully submits as under:-
1- That the complainant and the accused are having friendly relations with each other. The accused requested the complainant to lend some money as the accused was in need of this amount for some his urgent work. Keeping in view the friendly relations the complainant could not ignore the request of the accused and consequently he gave a friendly loan amount of Rs. \_\_\_\_\_/- in cash to the accused in the first week of \_\_\_\_\_\_\_. At the time of taking this loan amount the accused assured that the accused would refund the same to the complainant within the period of \_\_\_\_\_\_\_ months positively.

2- That after admitting his liability to refund /repay the said loan amount, the accused issued an account payee Cheque No. \_\_\_\_\_\_\_ dated \_\_\_\_\_ for Rs. \_\_\_\_\_/- drawn on \_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_\_ in favour of the complainant.

3- That the complainant presented the above mentioned Cheque with their banker i.e. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for encashment but to the utter surprise of the complainant above mentioned Cheque was dishonoured by the banker of the accused i.e. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_ due to the reason “insufficient fund” vide Cheque return Memo dated \_\_\_\_\_\_\_\_. The intimation in this regard was received by the complainant from his banker.

4- That after dishonourment of the said Cheque the complainant contacted the accused and requested the accused to make the payment of the dishonoured Cheque then the accused requested the complainant to present the above said Cheque again for encashment.

5- That as per the definite assurances the complainant again presented the above mentioned Cheque with their banker i.e. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for encashment but to the utter surprise of the complainant above mentioned Cheque was dishonoured by the banker of the accused \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ due to the reason “ACCOUNT CLOSED” vide \_\_\_\_\_\_\_ Cheque return Memo dated \_\_\_\_\_\_\_\_\_\_\_. The intimation in this regard was received by the complainant from his banker.

6- That at the time of issuing the above mentioned Cheque the accused had full knowledge that the said Cheque would be dishonoured due to insufficiency of the funds as the accused had no sufficient amount in his bank account to encash the same. Firstly the accused issued the said Cheque then after closed his bank account intentionally and deliberately. By issuing this false and bogus Cheque intentionally and deliberately the accused has cheated the complainant and have committed the criminal offence punishable under section \_\_\_ of the Negotiable Instruments Act and under Section \_\_\_ of Indian Penal Code hence the accused is liable to be prosecuted and punished as per the provisions of the Act.

7- That the complainant sent a legal Notice dated\_\_\_\_\_\_\_\_\_ through registered A.D. calling upon the accused to make the payment of bounced Cheque to the complainant within 15 days of receipt of this legal notice. But after receiving these legal Notice neither the accused made the payment nor send the reply of the legal Notices to the complainant.

8- That complainant and the accused have been residing at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, the banker of the complainant is also situated at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ the accused handed over the Cheque to the complainant at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and thus entire cause of action accrued in favour of the complainant at \_\_\_\_\_\_\_\_\_\_\_\_\_\_ within the territorial jurisdiction of this Hon’ble court and therefore this Hon’ble court has got the jurisdiction to entertain and try the present complaint.

PRAYER:-

It is, therefore, most respectfully prayed that the accused may kindly be summoned, prosecuted and punished as per the provisions of the law.
Dated \_\_\_\_\_\_\_\_ Complainant.

Through counsel:
\_\_\_\_\_\_\_\_\_\_\_\_\_, Advocate, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_