**Sec 494 RW SEC. 34 OF THE INDIAN PENAL CODE**

IN THE COURT OF THE JUDICIAL MAGISTRATE, FIRST CLASS, (ANTI-CORRUPTION COURT), PUNE AT PUNE

Criminal Complaint No. Smt. .... D .... A .... S...., )

age 25 years, occupation - service, ) Complainant

resident of C/o.Shri DAD, 175 Kothrud, )

PUNE 411 029. )  
Versus

1. Shri .... D .... A .... M ...., )

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age 30 years, occupation - business, )

2. Smt. .... D .... A .... B ...., ) Accused  
age 55 years, occupation - household, )

3. Smt. .... D .... A R , )

age 20 years, occupation - education, )

all residents of 320 Erandwana, )

PUNE 411 004. )

A COMPLAINT U/S 494 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, while the accused No. 2 is the mother and the accused No. 3 is the second wife of the accused No. 1.

2. That the complainant was married to the accused No. 1 at Pune 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 Lata, and likewise, the accused No. 3, before this second marriage, was also' known by her maiden name as Pata.

4. That after the marriage, the complainant and the accused No. 1 cohabited together for about three years. However, during the existence of their marriage, this complainant could not beget a child, and hence, on that count, the accused Nos. 1 and 2 were nervous and unnecessarily offended for no fault on the part of this complainant.

5. That this complainant submits that last year, in the month of June, the accused No. 1 told this complainant that she should better go to her parents', at least, for a few days for a medical check-up, and under that pretext, she was sent to stay with her parents.

6. That, thereafter, the complainant No. 1 did not either come to take back for cohabitation, nor allow her to do so, and thus, the accused No. 1 has deserted this complainant.

7. That this complainant learnt from very reliable sources that the accused No. 1 is going to contract marriage on with the accused No. 3 at the remote place near Katraj, and the ceremony was fixed to be carried out in a bungalow of one, Shri XYZ.

8. That accordingly, this complainant lodged a report with the Sahakarnagar Police Station, requesting them to help this complainant, and the police did try to do so, but they could not register the offence committed by the accused for the reason that the venue of the marriage was changed.

9. That, however, this complainant could know the changed venue, and she collected all the details with a view to registering the said offence.

10. That this complainant states and submit that the said second marriage between the accused Nos. 1 and 3 was celebrated in the Ganesh Mandir, one km away from Katraj, which took place on ......at 6.00 p.m., and about 100 people were present for the said marriage.

11. hat while celebrating the said marriage between the accused Nos.1 and 3, all the religious ceremonies and rites were performed.

12. That the cause of action for this complaint first arose on……. and hence, this complaint filed today is well within limitation.

13. 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.

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

15. That the complainant, therefore, prays that the accused be kindly charged with and tried for the offence punishable u/s 494 R/W Sec.34 of the Indian Penal Code and punished according to law.

Pune, Sd/- DAS

COMPLAINANT  
Dated :

Sd/- x X x

ADVOCATE FOR COMPLAINANT

VERIFICATION

I, Smt. DAS, the present complainant, do hereby state on solemn affirmation that the contents of this complaint in paras 1 to 15 are true and correct to the best of my knowledge and belief, and so I have signed hereunder.

Sd/- DAS  
aaaa COMPLAINANT