

*Draft For the use of the Netizens who are threatened with prosecution
for postings on Facebook, Twitter or other social media*

ANTICIPATORY BAIL APPLICATION

IN THE COURT OF DISTRICT AND SESSIONS JUDGE, AT -----

IN THE MATTER OF

STATE

VS

Police Station -----

FIR NO. Yet to be filed

U/S Section 66A of ITA 2008 and other sections of IPC such as 295A,505,
499

**APPLICATION U/S 438 CRPC FOR GRANT OF ANTICIPATORY
BAIL ON BEHALF OF THE ACCUSED-----**

MOST RESPECTFULLY SUBMITTED AS UNDER :-

1. That I, Sri/Smt s/d/o

residing physically at and virtually at

www.facebook.com/....., www.twitter.com/..... ,www.....

have posted the content as indicated in annexure to this application

2. That based on the precedents of the actions initiated by Police in

different parts of the country in recent days and more particularly in

the cases of Government of Puducherry Vs Ravi Srinivasan on the

complaint made by one Sri Karti Chidambaram and State of Maharashtra Vs Ms Shaheen Dadha on the complaint of one Sri Bhushan Sanke, there is a reasonable probability of a false and bogus case being hoisted on me with malafied intentions,

3. That I have no malicious intentions in making this post which I have made as a free Citizen of India under the Freedom of Expression guaranteed to me by the Constitution of India under article 19(1)
4. That the police may falsely implicate the applicant in any case, the applicant is a respectable citizen of the society and is not involved any criminal
5. That the postings does not constitute any criminal offence under any law in India.
6. That the applicant is not required in any kind of investigation nor any kind of custodial interrogation is required.
7. That the applicant is having very good antecedents, he belongs to good family and there is no criminal case pending against them.

8. That the applicant is a permanent resident and there are no chances of their absconding from the course of justice.

9. That the applicant undertakes to present himself before the court as and when directed.

10. That the applicant undertakes to cooperate with the police during the course of investigation.

11. That the applicant undertakes not to tamper with the evidence or the witnesses in any manner.

It is therefore prayed that the court may direct that the applicant shall be released on bail in the event of their arrest by the police.

Any other order which the court may deem fit and proper in the facts and circumstances of the case may be also passed in favor of the applicant.

(-----)
APPLICANT
THROUGH
COUNSELS