ADITYA SHUKLA
Advocate
Allahabad High Court

Office No.: 05227964333
Mobile No.: 9415028774
Email Id: adityakanail23@gmail.com
Chamber No.: 131, A Block, High Court, Lucknow
164, High Court, Allahabad

LEGAL DEMAND NOTICE

Ref No:-01/2025/SSB/LDN

Date:

Subject: Notice of Default and Demand of Payment.

To,

1. M/S STYLE-O ENTERPRISES,
Bakrak Colony, Resham Ghar Colony,
Hiranagar, District- Kathua,
Jammu & Kashmir, Pin Code: 184148
Phone No.7942838808
Through its Proprietor Mr. Gurmeet Singh

2. Mr. Gurmeet Singh,
S/o- Shri Madan Lal,
R/o- Bakrak Colony, Resham Ghar Colony,
Tahsil- Khanpur/Rajbagh,
Police Station: Rajbagh, District- Kathua,
Jammu & Kashmir,
Pin Code: 184148
Phone No. 9102109275, 9622335885

Sir,

Pursuant to the instructions from and on behalf of my client:-

Shri Veerendra Singh,
S/o- Jaiveer Singh,
R/o- Ghiror, District- Mainpuri,
Uttar Pradesh,
Pin Code: 205121
Phone No. 9027270678

I do hereby serve you with the following legal demand notice:-

1. That my client is a S.S.B. Personnel and serving as a constable in Sashastra Seema Bal (S.S.B.).

2. That you are also an Ex-SSB Personnel as you had joined the S.S.B. on 15.12.2005 and served as a Head Constable in SHQ, Hyderabad at J&K in

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Sashastra Seema Bal (SSB) and later on 30.04.2022, you had resigned from your govt. service.

3. That a firm/factory was founded by you in the name and style of **"M/S STYLE-O ENTERPRISES"** in the year 2019 as the proprietor of the said establishment.

4. That as you are an Ex-SSB personnel, you have targeted the serving personnel in SSB and personnel in other Para-military forces and communicated with them through their Phone numbers, Whatsapp, Zoom app meetings, Telegram app and other online modes of communications and convinced and asked them to invest in your aforesaid establishment/company and guaranteed them to return the profits at the rate of 7.5% to 10% per month as per their invested amount of money.

5. That you and your agents used to say that your business has spread to foreign countries and you had opened many companies in Jammu and your companies also invest in Real Estates.

6. That you used to say in online meetings that all of you govt. service personnel cannot even make a living from your salary, to run your household properly, you all should think of starting a side business or invest your money in your business and you used to say that you have made a lot people rich.

7. That you used to give targets to the other personnel to take franchise of your business and asked them to add more persons, in return take gifts from you, either take a car or take a house and told them to give bonus and guaranteed them to their money too, in this way, by giving greed and temptation, you used to join them with yourself in your business.

8. That when my client asked his other colleagues, they told him that this business has been running for many years, Many SSB-Personnel trusted in you and your business as they know that you were also an Ex SSB-Personnel, Thus, at your behest, they had invested in your business and deposited their hard earned savings and earnings in the accounts of your multiple establishments/companies and firms.

9. That to win their trust, you have paid them back as per the aforesaid rate of interest for few months to show that there are a lot of business you have and if

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they in a continue manner invest their hard earned money in your business then their money will keep growing and their savings will continue.

10. That you have made some Para-Military Personnel to leave their govt. services by luring them with the promise of earning more money, and then with their help you kept making inroads among the Para-Military Forces and other Central Police Forces and you made them believe and asked and convinced them to invest their hard-earned money in your false profit earning companies.

11. That you have created a website in the name and style of **"SAFEPLAN"** and ID's of all investors were created on this website, on which their invested amount and plans were visible. Later on, after some time you have closed the website named **"SAFEPLAN"** and told to all the investors that it was becoming difficult to work in rupees in India as the Indian government had frozen many of your company's accounts.

13. That when my client enquired about the status of your company/firm to withdraw his money, then it was informed by you that your company has lost its liquidity and is closing business at this stage". Then, it was came to know to my client that he was and other 4000 persons were cheated by you as you were running a nexus of mass marketing fraud in the name of business and they had lost all their hard earned money.

14. That my client is also in one of those more than 4000 victims of mass marketing fraud, who have asked and convinced by you in the name of earning more money with the rate of 7.5% to 10% interest per month, and my client has deposited a sum of **₹22,02,500/-(Twenty two lakhs two thousand five hundred)** in the accounts of your firms/companies as you have promised him to guaranteed profitable return.

15. That my Client did paid/invested in your firm named **"M/S STYLE-O ENTERPRISES"** via account transfer, in account no. **247005000575, ICICI BANK**

Sl. No.	Date	Amount	UTR No.
(a)	02.03.2024	4,00,000/-	4597878162091-INB
(b)	05.03.2024	4,00,000/-	4597858162094-INB

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(c)	05.03.2024	1,00,000/-	4597857162095-INB
(d)	11.04.2024	2,00,000/-	4698292162098-INB
(e)	13.05.2024	5,00,000/-	4597868162093-INB
Total:		**16,00,000/-**	

16. That my client did transferred/paid/invested in Mr. Grummet Singh's account no. **30739301143**.

Sl No.	Date	Amount	UTR No.
a)	14.09.2024	₹5,00,000/-	SBIYA24258141200057080147

17. That my client did paid/transferred/invested in the **account no. 086305000953, of "SHABU TRADERS", Branch- Samba (J&K)** on your behest.

Sl No.	Date	Amount	UTR No.
a)	09.11.2024	₹1,02,500/-	SBIN524314275245

18. That when after some time my client raised his concern for the payment of return of his invested money which was deposited/invested in your companies and was promised to return timely along with 7.5% to 10% interest per month guaranteed by you, then in response to it you are just procrastinating and giving dates only.

19. That many dates and time have passed, but you have not returned any amount till today.

20. That in spite of acknowledging the liability of payment, You have been miserably failed to make payments of the amount of **₹22,02,500/-(Twenty two lakhs two thousand five hundred)** which is due to my client from you, deliberately with an intent. Hence, you are liable to pay **₹22,02,500/-(Twenty two lakhs two thousand five hundred)** along with 7.5% to 10% rate of interest per month as guaranteed by you at the time of investing money in your companies.

21. That, thus you are liable to pay the total amount of **₹22,02,500/-(Twenty two lakhs two thousand five hundred)** along with 7.5% to 10% rate of interest per month to my above named client and he is entitled to recover the same from you.

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22. That my client requested you several times through telephonic calls and messages to you for the payment of the said outstanding amount, but you have always been delaying the same on one pretext or the other and so far have not paid even a single penny out of the said outstanding undisputed amount.

23. That my client has given you chance upon chance repeatedly to make timely payments, but your failure to do so lands you in this position.

24. That from reliable sources it was known to my client that you have left the country and currently living and running your business in Dubai, United Arab Emirates (UAE).

25. That all the above mentioned facts showed that you are indulge in Mass Marketing Fraud and running a nexus which involves deceptive practices aimed at inducing a large number of people to part with their money, these fraudulent activities related to cheating, breach of trust and forgery as you have defrauded nearly about 4000 peoples.

26. That you are a large economic offender, who can be prosecuted under The Fugitive Economic Offenders Act, 2018 as you have left the country and living in Dubai, United Arab Emirates and running your business there to avoid criminal prosecution.

a) I, therefore, through this Legal Demand Notice finally call upon you to pay my client **₹22,02,500/-(Twenty two lakhs two thousand five hundred)** along with 7.5% to 10% rate of interest per month, immediately **within 15 days** from the date of receipt of this legal demand notice either in cash or by demand draft or cheque or through account transfer/RTGS/NEFT, whichever mode suits you better, failing which and if not paid within time then we can file criminal complaint before jurisdictional police station and initiate criminal proceedings for criminal breach of trust, misappropriation of money, fraud, willful default and cheating, mass marketing fraud, which are non-bailable offences under Indian Penal Code (IPC), 1860/Bhartiya Nyaya Sanhita (BNS), 2023, Companies Act, 2013 and Fugitive Economic Offenders Act, 2018 and other appropriate legal action will be taken against you and your companies/firms for the recovery of the aforesaid amount.

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b) Kindly comply with the demand under this notice and avoid any legal action as well as all unpleasantness.

c) In case of non-compliance, further needful action will be resorted to, holding you liable for all costs and consequences.

d) A copy of this notice is saved in my office for record and to take future course of action.

Regards

Aditya Shukla
Advocate
Allahabad High Court,
Lucknow
Contact No. 9415028774

Copy to:-

a) **Ministry of Home Affairs(MHA)**
b) **Ministry of External Affairs(MEA)**
c) **Consulate General of India, Dubai, UAE**
d) **Directorate of Enforcement(ED)**
e) **Central Bureau of Investigation(CBI)**
f) **Reserve Bank of India(RBI)**
g) **Central Economic Intelligence Bureau(CEIB)**
h) **Serious Fraud Investigation Office(SFIO)**
i) **Economic Offences Wing(EOW)**
j) **Crime Branch, Crime Investigation Department(CBCID)**
k) **Principal Secretary, Home, Govt. Of UP**
l) **Director General of Police(DGP), Uttar Pradesh**
m) **Commissioner of Police, Lucknow**
n) **Station House Officer, Police Station:Mohanlalganj**