

MODI PROPERTIES PVT LTD

5-4-187/3 & 4, 2nd Floor,
Soham Mansion, MG Road
Secunderabad-500003.

Date: 13th July 2023

To,
The Station House Officer
Secretariat Police Station.

Sub: Criminal Complaint against Sriramoju Sambeshwar Rao (**Accused**)
S/o Sri.Ramabrahamam, Aged about 61 years, Occ; Business R/o. Flat
No.201, Archana Apartments, Begumpet, Hyderabad (Contact No.
9848019933) for committing fraud, cheating, criminal breach of trust, etc.

Respected Sir,

I, Sachin Malve, S/o. Durgadas Malve, R/o.Secunderabad, Occ: Business
and authorized signatory of M/s. Modi Properties Pvt. Ltd. (**Complainant**)
would like to bring to your kind attention the acts of cheating and fraud
committed by the Accused as detailed under:

BRIEF FACTS OF THE CASE:

1. The Complainant herein is engaged in the business of real estate development. Accused approached the Complainant with a proposal of development for land admeasuring Ac 01-39 Gts forming part of Sy. No. 431/2, 432/2, 433/2, 434/2, Gundlapochampally Village, Medchal Mandal, Ranga Reddy District (**Property**) stating that he has acquired the right & title by way of various registered Agreement of Sale cum General Power of Attorney from 18 people.
2. On the assurance and representations made by the Accused that he has the sole and exclusive right over the Property and is entitled to enter into a development agreement, the Complainant discussed and negotiated the terms of development, pursuant to which the Complainant executed a Letter of Intent (**LOI**) dated 07.08.2018 with the Accused. At the time of executing the LOI the Complainant was supposed to pay only Rs. 10,00,000/- (Rupees Ten Lakhs), however Accused after execution of the LOI pressurized the Complainant to part with more monies, in absence of which the Complaint was threatened with terminating the LOI, as a result of which the Complainant paid an amount of Rs. 60,00,000/- (Rupees Sixty Lakhs Only) to the Accused as advance.
3. After signing the LOI and paying the advance, the Complainant along with the Accused has approached various authorities including HMDA for obtaining necessary permissions and approvals with respect to the development of the Property.



MODI PROPERTIES PVT LTD

5-4-187/3 & 4, 2nd Floor,
Soham Mansion, MG Road
Secunderabad-500003.

4. The Complainant entered into the LOI in August 2018, and began inspecting the property and delineating the site to begin development work, the global pandemic occurred and stalled the project, resulting in no progress for a span of three-years. As soon as the Covid restrictions were lifted, the Complainant began submitting detailed plans, layouts for the HMDA applications which were duly signed by the Accused. During this time the Complainant called upon the Accused on multiple occasions to come forward to execute a definitive detailed Joint Development Agreement, however, the Accused delayed the same on some or the other pretext.
5. Thereafter, to the utter surprise of the Complainant, one Mr. Venugopal Reddy (Contact No.9177295539), as a representative of the other owners, reached out to the Complainant stating that they have a proposal of development of the Property from M/s Symantaka Infra Bachupalli. The Complainant immediately approached the Accused raising its concerns, but the Accused with utter dishonest intent to deceive the Complainant, stated that nothing of this sort could happen. The Complainant once again believed the Accused and continued with the work in full confidence.
6. Subsequently, in March 2023 the Complainant through third parties got to know that other developers have been visiting the Property and were negotiating terms of development.
7. The Complainant then approached the Accused and confronted him about this situation and that's when the Accused stated that he has better offers and wants to renegotiate the terms of the LOI.
8. The Complainant at this stage, left with no other option, issued a legal notice dated 13th April 2023 calling upon the Accused to execute the Joint Development Agreement, in spite of which, the Accused has not come forward to execute the development agreement.
9. On the contrary, the Accused in collusion with the earlier owners is trying to assign the Property to third parties. All of this makes it evident that the Accused has cheated and defrauded the Complainant to extract money from the Complainant and unjustly enriched himself. The Accused never had the intention to implement the terms of LOI and hence has been misleading the Complainant with false assurances and promises.



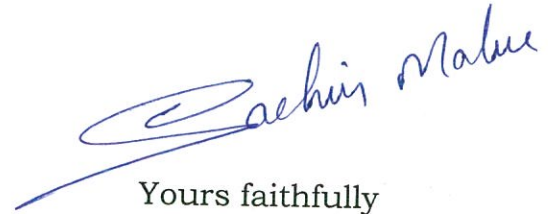
MODI PROPERTIES PVT LTD

5-4-187/3 & 4, 2nd Floor,
Soham Mansion, MG Road
Secunderabad-500003.

10. The Complainant trusted the Accused and based on his assurances and representations have spent about Rs. 86,00,000/- till now towards the project and obtaining approvals, sanctions, etc. including the money given to the Accused. Therefore, the complainant has not only been the victim of fraud, deceit but also criminal breach of trust by the Accused.

Therefore, I request you to register my complaint and take appropriate criminal action against Accused i.e., Sriamoju Sambeshwar Rao for cheating, defrauding, criminal breach of trust, and extracting money from the Complainant on false pretext along with other offences that the Police may find in the course of its investigation.

Thanking You



Yours faithfully
(Sachin Malve)
Mob:9866222222

Enclosures:

1. Letter of Intent
2. Payment Receipts.
3. Site Plan, 1st Floor Plan, 2nd floor Plan.
4. Typical Floor Plan 3rd to 10th Floor.
5. HMDA Shortfall letter.

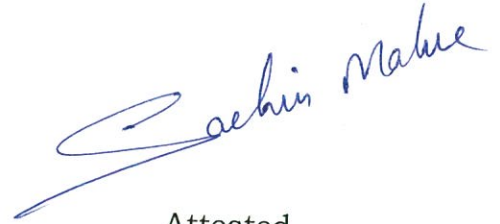
MODI PROPERTIES PVT LTD

5-4-187/3 & 4, 2nd Floor,
Soham Mansion, MG Road
Secunderabad-500003.

AUTHORIZATION

We Modi Properties Pvt Ltd is hereby authorize Mr.Sachin Malve, S/o. Durgadas Malve, R/o : Secunderabad. He is representing as a partner in our other projects for the Company. We hereby authorize him to file the Police Complaint before the concerned police station against Sriramoju Sambeshwar Rao S/o Sri.Ramabrahamam, on my behalf of Modi Properties Pvt Ltd and to sign & receive all relevant documents pertaining to the above mentioned complaint.

Modi Properties Pvt Ltd
For Director



Attested
(Sachin Malve)

Place: Secunderabad
Date : 13-07-2023