

To,
The Station House Officer
Cyber Crime Cell / Police Station, Phase 8
Mohali, Punjab – 160055

Subject: For taking strict legal action against NSL Infotech Pvt. Ltd. and its Directors for Cheating, Criminal Breach of Trust, Blackmailing, Source Code Theft, Cybercrime, Domain Hijacking, and IP Infringement and other cognizable offences.

Sir,

1. That I, Advocate Akash Sheoran, enrolled with the Bar Council of Punjab & Haryana, and authorized representative of Mr. Gailord J.C. Bovrisse, Founder & CEO of Whuups Inc. (a U.S.-incorporated entity with principal office at 16192 Coastal Highway, Lewes, Delaware, USA), respectfully submit this criminal complaint against the following individuals and their company for committing cognizable offences under BNS and relevant Cyber laws: **1) Mr. Gaurav Sethi** – Co-Founder and CEO, NSL Infotech Pvt. Ltd., **2) Mr. Chirag Kohli** – Director/Co-Founder, NSL Infotech Pvt. Ltd. **3) Mr. Jatinder Arora**– Director/Co-Founder, NSL Infotech Pvt. Ltd, Plot No. F-547, Phase 8A, Industrial Area, Mohali, Punjab – 160055.
2. That Whuups Inc., is a U.S.-based mobile app and tech platform, contracted NSL Infotech Pvt. Ltd. for outsourced software development and enhancement of its proprietary mobile and web platforms. In furtherance of this engagement, a **Non-Disclosure Agreement (NDA) was executed on 22 August 2024**, restricting NSL from unauthorized usage, duplication, or sharing of code, credentials, or IP assets etc. The copy of the same is attached with the present complaint.
3. That between 03 November 2024 and 04 June 2025, NSL was paid a total of USD 30,823.71 through 20+ structured PayPal transactions for specific deliverables, including but not limited to OTP-based login, FLIPS AR feature, Whuups Admin Dashboard, and bug-free release for Google Play and Apple Store and a controlled access was provided to NSL's directors for GitHub (codebase), Firebase (backend), Apple/Google Developer Console, and OVH domain services and other developments.
4. That despite the above, NSL and above named accused persons have committed the following wilful and fraudulent criminal acts that include but not limited to tampering & destruction of Source Code and NSL deliberately deleted the functioning peer-to-peer call code which was the complainant's code and broke it and replaced it with old 2022 legacy

files, knowingly rendering the core communication module of the app inoperable. This sabotaged years of development costing a tragic loss to Whuups Inc.

5. That furthermore, despite explicit payments tied to modules, NSL failed to deliver OTP login, FLIPS AR, and backend bug resolution. The final build was partial, dysfunctional, approvaland non-compliant with the agreed scope. In an email dated 4 May 2025, Gaurav Sethi admitted to using an external API solution for the FLIPS feature instead of building it natively as agreed. This is a clear admission of breach.
6. That not only this, the NSL intentionally made Illegal GitHub Access without any from Whuups Inc & made an IP Theft, the NSL uploaded Whuups's private source code to its public GitHub account under a fake repository titled "Whuups-mobile-app", and quo this DMCA takedown was initiated by the complainant with GitHub support Ticket ID: 3547241 receipt.
7. That there have been Multiple Attempts to Hijack Domain Name and NSL made at least two unauthorized attempts to transfer the domain whuups.com to an unrelated registrar (PDR Ltd.), confirmed by OVH logs. These were blocked as fraudulent.
8. That NSL used Whuups's credentials to activate third-party API services (e.g., Banuba FLIPS) under Whuups's name and on its billing details, without approval. No such authority was granted.
9. That NSL raised Invoice NSL-INV-25-0034 for USD 1,800 on 28 April 2025, for representing Whuups at Gitex 2025 however whuups never approved any such payment or representation and accused Gaurav himself stated "you are not obligated to pay" reflecting an attempt at wrongful gain and possibly fabrication of commercial dues.
10. That in june 2025, whuups and AWS support team discovered that NSL withheld control panel access, concealed infrastructure details, and misrepresented server setup and the complainant was forced to hire a former NSL employee to audit the platform, who confirmed significant deficiencies—indicative of criminal concealment and sabotage.
11. That furthermore NSL refused to release working builds or restore access to client repositories unless an additional USD 9,800 was paid – despite having received full payment which amounts to criminal breach of trust, coercion and blackmailing and further threatened to sell the domain name and are non-compliant.
12. That when temporary access was reinstated, NSL tampered with live backend files, further destabilizing the app. Thereafter the access was immediately revoked. This being an offence under IT act 2000.

13. That not only this, Chirag, one of the accused persons, behaved inappropriately with Mr. Bovrisse's female partner during a joint trip to Singapore and quo this screenshots are there admitting his fault. While this is being reported separately, it reflects the company's leadership ethics.
14. That there are multiple admissions of deletion, API misuse, domain transfers, and payment disputes were made in writing by Mr. Gaurav Sethi and NSL staff.
15. That the accused have refused to hand over the latest version of code or restore GitHub access unless further unjustified payments are made, amounting to criminal extortion and breach of trust.
16. That the above-mentioned facts clearly show that the accused persons have committed various offences under BNS 2023, IT act 2000 etc, and the complainant will provide with all the relevant material, emails and other evidences, to the department as and when needed to proceed against the accused persons.

That the abovementioned conduct of the accused persons clearly attract various offences under the BNS 2023, IT Act 2000 and copyrights act 1957, Therefore I humbly pray that an FIR be registered against the named accused persons and NSL Infotech Pvt. Ltd. under applicable provisions of law and the accused persons be arrested as their arrest is necessary given the aforesaid and they will steal and misuse the intellectual property and the matter be transferred to the Cyber Crime Cell for immediate investigation into domain, code, and digital property misuse and a forensic seizure of NSL's office systems, email accounts, GitHub logs, Firebase access history, and other digital assets be conducted, I shall be highly thankful to you.

Through advocate-

Akash sheoran

Chamber no.45, Punjab and haryana high court, Chandigarh.

Ph. 8076770343

Annexure A – Detailed Chronology of Events

Annexure B – Payments Chart with PayPal Transaction IDs

Annexure C – Authorisation letter for the present complaint.

Annexure A: Chronology of Events – Whuups Inc. vs. NSL Infotech Pvt. Ltd.

Date	Event
22 Aug 2024	NDA is executed between Whuups Inc. and NSL Infotech Pvt. Ltd., restricting unauthorized access and confidential usage of intellectual property.
03 Nov 2024	First payment of \$500 made by Whuups Inc. to NSL, as part of Invoice NSL-INV-24-0007, initiating work in good faith.
06 Nov 2024 – 04 Jun 2025	Multiple payments made by Whuups Inc. totaling \$30,823.71 USD to NSL via PayPal for mobile/web development.
13 Nov – 13 Dec 2024	Technical issues begin to arise regarding module delivery and NSL insists on further payment without clearing issues.
27 Dec 2024	NSL (specifically accused Gaurav Sethi) tries to steal and attempts to transfer the domain name whuups.com to PDR Ltd. without authorization. OVH (domain registrar) blocks the unauthorized transfer.
Mar–Apr 2025	NSL allegedly begins altering the GitHub repository. Complainant’s developed peer-to-peer call code is broken and removed and replaced with outdated versions.
Apr–May 2025	Whuups discovers that critical app features like OTP login and FLIPS integration have not been completed.
May 2025	Gaurav Sethi attempts to access OVH credentials again and makes a second attempt to transfer the domain to PDR Ltd. (email dated 26 Jun confirms prior attempt).
27 Jun 2025	Whuups demands that NSL disclose the API provider for the FLIPS feature and reminds them they are unauthorized to execute licensing under Whuups Inc. name.
01 Jul 2025	Temporary access to Whuups’s Apple and Google developer accounts is granted to NSL.
02 Jul 2025	NSL admits in email that call feature was removed and then partially worked on again, but justifies it under platform evolution and accuses the complainant of halting collaboration.
08 Jul 2025	GitHub acknowledges DMCA complaint from Whuups Inc. and registers complaint Ticket ID: 3547241.
08 Jul 2025	Whuups Inc. sends a formal IP theft and code infringement notice to GitHub with request for takedown and seizure of NSL repositories.

Annexure B – Payment Chart (PayPal Transactions)

Vendor: NSL Infotech Pvt. Ltd.

Total Amount Paid: \$30,823.71 USD

Dayment mode: PayPal

Date	Amount (USD)	Transaction ID / Bill ID
03/11/2024	\$500.00	3RR82478B77762948
04/11/2024	\$948.00	17E527498N931142H
05/11/2024	\$792.00	5WB39870CV376112R
06/11/2024	\$3,000.00	7SH84339J7796791L
13/11/2024	\$1,500.00	7N217646Y39885633
29/11/2024	\$500.00	0X95940098929840G
13/12/2024	\$1,424.00	U-6DN05218GY8604825
04/02/2025	\$195.00	6PL09061U6884571N / U-8LP44886BR732091S
12/02/2025	\$1,200.00	4A6804047A9741401 / U-5D1580335S328615M
12/02/2025	\$1,040.00	7JW262226K207034M / U-43E33239KD6574529
12/02/2025	\$1,619.00	7D656193CV867935W / U-4YU71808S05121225
06/03/2025	\$1,055.00	2EF32895AR870282R / U-2DA234555F563343F
06/03/2025	\$3,000.00	9W008381S1888234W
06/03/2025	\$200.00	9FJ741800S080245T
07/03/2025	\$700.00	6LW25596PT634351D
03/04/2025	\$1,500.00	4017014244734622H
03/04/2025	\$1,448.71	0EM617971D297043N
22/05/2025	\$5,000.00	45175250F1779722N
04/06/2025	\$2,800.00	70U93687TU3660527

Total Amount Paid by whuups inc.: \$30,823.71 USD