

**IN THE HIGH COURT OF JUDICATURE FOR  
RAJASTHAN**

(AT JAIPUR BENCH)

**PUBLIC INTEREST LITIGATION (PIL)**

Under Article 226 of the Constitution of India

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**IN THE MATTER OF:**

**Tech Legal Awareness Forum (NGO)**

Through its Authorized Representative

Address: .....

District: .....

State: Rajasthan

... **Petitioner**

VERSUS

1. **Government of Rajasthan**  
Through Chief Secretary  
Secretariat, Jaipur
2. **Rajasthan Police**  
Through Director General of Police  
Jaipur
3. **Superintendent of Police, Bharatpur**
4. Other authorities as may be required

... **Respondents**

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**WRIT PETITION (PUBLIC INTEREST LITIGATION)**

The humble petition of the petitioner above named most respectfully shows:

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# 1. Introduction of the Petitioner

That the petitioner is a registered NGO working in the field of **legal awareness, cyber crime awareness and protection of victims of financial fraud.**

The petitioner has no personal interest in the present matter and has approached this Hon'ble Court purely in public interest.

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## 2. Facts of the Case

1. That a large scale financial fraud has been committed through an online investment scheme known as **XPO / XPO Portfolio.**
  2. Thousands of investors across multiple states of India have invested their money in the said scheme.
  3. The scheme promised unrealistic returns and operated through **network marketing and referral structure.**
  4. Many FIRs have been registered in different police stations including Bharatpur district under provisions of:
    - **Banning of Unregulated Deposit Schemes Act, 2019**
    - **Prize Chits and Money Circulation Schemes (Banning) Act, 1978**
    - **Bharatiya Nyaya Sanhita, 2023**
  5. The number of victims is estimated to be **more than 3,50,000 across several states.**
  6. Due to the large scale nature of the fraud, there is a need for **centralized and coordinated investigation.**
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## 3. Grounds

The petitioner is approaching this Hon'ble Court on the following grounds:

- A. Because the fraud involves **thousands of victims and large public money.**
  - B. Because investigations are being conducted by different police stations independently.
  - C. Because lack of coordination may affect effective investigation.
  - D. Because the matter involves **serious financial fraud affecting public interest.**
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## 4. PRAYER

It is therefore most respectfully prayed that this Hon'ble Court may kindly:

1. Direct the respondents to constitute a **Special Investigation Team (SIT)** to investigate the XPO fraud.

OR

2. Transfer the investigation to an independent agency such as
  - o Central Bureau of Investigation
  - o Enforcement Directorate
3. Direct the authorities to identify and attach the properties of the accused persons.
4. Direct the authorities to take steps for **recovery of the money of victims**.
5. Pass any other order which this Hon'ble Court may deem fit in the interest of justice.

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## 5. Interim Relief

Pending final disposal of the petition, the petitioner prays that this Hon'ble Court may:

- Direct respondents to submit a **status report of all FIRs registered in relation to the XPO scheme**.

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**Place: Jaipur**

**Date: \_\_\_\_\_**

**Petitioner**

Tech Legal Awareness Forum

Through Counsel

Advocate \_\_\_\_\_