

Mitra Foundation

Registered NGO for Financial Awareness & Legal Aid

To,

The Officer In-Charge,
Cyber Crime Police Station / Economic Offences Wing,
Jaipur Headquarter, Rajasthan

Subject: Collective Complaint by Mitra Foundation against Ponzi/Pyramid Scheme “Xeno Portfolio (XPO)”

Respected Sir/Madam,

We, **Mitra Foundation**, a registered non-governmental organization engaged in financial awareness and legal assistance for affected citizens, hereby submit this collective complaint on behalf of multiple anonymous victims regarding fraudulent activities carried out by the online platform known as **Xeno Portfolio (XPO)**.

1. Nature of the Scheme

- The platform operates through a **Ponzi / Pyramid structure**. New investors are promised fixed or unusually high returns.
- Investors are incentivised to recruit new members through **commissions/bonuses**, forming a multi-level referral chain.
- Returns initially paid to early investors appear to be funded from new investors’ money rather than legitimate trading or investments.

2. Situation of Victims

- Numerous victims have reported that their **funds are now locked** and withdrawals are restricted or denied.
- Victims fear that the scheme may be wound down in coming months, causing irreversible loss of principal funds.
- Many victims have explicitly requested **anonymity**, and Mitra Foundation is filing this complaint as their representative to protect their identities while seeking legal redress.

3. Promoters and Operators

- The alleged **creator/owner of XPO appears to be based outside India**, coordinating operations via digital channels (website, mobile app, Telegram/WhatsApp groups, Zoom/online webinars).
- Several **local Indian promoters/recruiters** actively solicit investments and collect funds. Mitra Foundation is attaching details of known recruiters/promoters where available.

Known/prominent recruiter details (as provided by victims):

1. Dr. Atal bihari Meena | 9602438620 | Xpo account
2. Mr. Raj Chaudhry | 7340021111 | Xpo account
3. Many More..

4. Legal Violations (Applicable Law)

- **Indian Penal Code (IPC):** Section 420 (Cheating), Section 406 (Criminal breach of trust), Section 120B (Criminal conspiracy).
- **Information Technology Act, 2000:** Section 66D (Cheating by personation using computer resources), Sections 43/66 (Unauthorized access/misuse of computer systems).
- **Prize Chits and Money Circulation Schemes (Banning) Act, 1978** – for pyramid/money circulation aspects.
- **Prevention of Money Laundering Act (PMLA), 2002** – if funds are routed through crypto/overseas channels.
- **Foreign Exchange Management Act (FEMA), 1999** – for unauthorized foreign exchange/forex operations.
- **Consumer Protection Act, 2019** – Unfair trade practices and deficiency of service.

5. Relief Sought (Prayer)

Mitra Foundation respectfully requests the following actions:

1. Register a formal **FIR** against the operators/promoters of Xeno Portfolio (XPO) and their local recruiters under the applicable sections of law mentioned above.
2. Conduct a thorough investigation into the platform's operations, bank accounts, and crypto-wallets, and **freeze** or **seize** assets where appropriate to prevent dissipation of investor funds.
3. Initiate steps under PMLA/FEMA to trace any fund transfers abroad and coordinate with international authorities (via MLAT/Interpol) against foreign operators.
4. Order immediate measures to **safeguard and recover investors' principal amounts**, and direct the platform to release funds where legitimate.
5. Share interim updates with Mitra Foundation on the progress of investigation and any actions taken to protect victims.

6. Annexures & Evidence (Enclosed)

- Annexure A: Consolidated list of victim transaction proofs (UPI / Bank / Crypto transfers) – redacted where victims requested anonymity.
- Annexure B: Screenshots of XPO app/website showing locked funds and promotional materials.
- Annexure C: Chat logs (WhatsApp/Telegram) and referral messages used by local promoters.
- Annexure D: List of alleged local promoters with any available KYC/bank details.

Mitra Foundation is prepared to fully cooperate with law enforcement agencies and provide any additional information or clarifications required during the investigation. In the interest of victim safety and to prevent further harm, we request expedited action.

For Mitra Foundation

Dr. A S Qureshi
Director
Mitra Foundation
NGO Registration No.: 987654321
Contact: 0744 2370101

Date: 13/September/2025

Instructions for Submission (for Mitra Foundation use)

1. Attach all annexures and evidence in physical or digital form when filing the complaint at Cyber Crime Police Station / EOW / ED.
2. If filing on the National Cyber Crime Portal (<https://cybercrime.gov.in>), select the appropriate category and upload Annexures A–D. Ensure redaction of personal identities where victims requested anonymity.
3. Provide a signed letter on Mitra Foundation letterhead and include NGO registration details and the authorized signatory's ID proof.
4. Keep a stamped receipt and FIR number for follow-up. Share the FIR number with victims via secure channels.

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