Chetna Anil Agrawal, Advocate
B.Com. L.L.B.
Court Office: 34, Table space hall, Lawyers chambers, B building, Shivajinagar District Court campus, Pune-411005
Office and address for correspondence : 202, Prachi Residency Phase 2, Main Baner road, Baner, Pune – 411 045
Mobile 9422778343, E mail: adv.chetnaagrawal@yahoo.com www.agrawallawfirm.in

Ref: Leg/Notice/05/2025/VB **Legal Notice** **Date: 24/04/2025**

(By Registered Post/Email)

To,
Mr. Vinayak Bhagat
GF - 6, Lotus Krest Phase 2, Green Domain Layout,
7th Cross Road, EPIP Zone, Brookfield,
Bangalore – 560066
Email: vinayakbhagat@hotmail.com
Mobile: +91 80765 95056

Subject: Legal Notice for Criminal Breach of Trust, Theft of Company Property, Unauthorized Access, Data Misuse, and Associated Violations

Sir,

Under the express instructions of my client **Mr. Vijay Bajaj**, Founder & CEO of **Global Media Research Ltd**, headquartered at 8, St James's Square, London, SW1Y 4JU, I, as his legal counsel, hereby issue this legal notice calling upon you to immediately cease and desist from your unlawful acts and take corrective measures as outlined herein. Failure to comply will leave my client with no option but to initiate civil and criminal proceedings against you before the competent courts of law.

1. You were previously employed by **Global Media Research Ltd**, during which you were entrusted with company-owned property and confidential business data, including client databases, proprietary event materials, speaker and sponsor contacts, and other sensitive assets. Upon cessation of your employment, you:

    a. **Unlawfully retained company-owned laptop and digital assets**, despite multiple reminders for their return;

    b. **Accessed and misused confidential business data** stored on said devices and company accounts;

    c. **Used such data and proprietary information** to assist or further a fraudulent enterprise, thereby breaching the trust placed in you by my client.

2. Your above actions constitute serious and willful violations of Indian laws, including but not limited to the provisions of Section 406 of the Indian Penal Code (IPC), which pertains to criminal breach of trust; Section 378 of the IPC, which deals with theft of company property; and Sections 43 and 66 of the Information Technology Act, 2000, which relate to unauthorized access to and misuse of confidential data.

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3. These offences not only breach statutory provisions but also violate the terms of your employment and fiduciary responsibilities owed to my client.

4. You are hereby called upon to:
   a. **Return the company-owned laptop and any other property** belonging to Global Media Research Ltd within **3 working days** from receipt of this notice;
   b. **Submit a notarized affidavit** confirming the deletion and non-usage of any confidential data, and affirming that such data will not be shared, distributed, or exploited in any form;
   c. **Cease and desist** from any further unauthorized use of proprietary information obtained during your employment;
   d. **Refrain from communicating** with any business contacts, sponsors, or speakers obtained through your prior role with the company.

5. Should you fail to comply with the above demands within **7 days** of receiving this notice, my client shall be constrained to:
   a. Initiate **criminal proceedings** under applicable provisions of the Indian Penal Code and the IT Act;
   b. File a **civil suit for damages and compensation**, including but not limited to reputational and commercial loss suffered;
   c. Approach the **Cyber Crime and Economic Offenses Cell** for immediate investigation and legal enforcement;
   d. Seek **permanent injunction** from competent authorities to restrain further misuse of confidential and proprietary data.

6. Please be informed that all costs and consequences of such proceedings shall rest solely upon you. You are further liable to pay a sum of **Rs. 15,000/-** towards the cost of issuance of this notice to my client.

Hence, this Legal Notice.

Adv. Chetna Anil Agrawal (Poddar)

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The above notice is issued as per my instructions and information.
Read, Understood, and Signed,

Vijay Bajaj
Founder & CEO, BTOES
Email: vb@proqis.com
Mobile: +44 7711 636366