

To,
The Presiding Officer
Consumer Disputes Redressal Commission
kumarswamy layout

Subject: Complaint Regarding Ownership Dispute and Allegations of Tampering of Sale Deed

Respected Sir/Madam,

I, arpit, resident of kumarswamy layout, wish to file a formal complaint against Concerned Authority regarding the following matter:

FACTS OF THE CASE:

1. Meera Devi holds a registered sale deed executed by Ramesh Kumar on January 15, 2015, which establishes her ownership of the entire land parcel in question, granting her prima facie rights under Article 300A of the Indian Constitution.
2. Ramesh Kumar allegedly altered the original sale deed after its execution but before registration, raising serious concerns of tampering and potential fraud, which Meera Devi must substantiate with clear evidence.
3. The Supreme Court's ruling in *K.K. Verma vs. Union of India* (1954) reinforces that registered documents are presumed valid, placing the burden on Ramesh Kumar to provide compelling evidence to challenge the authenticity of Meera Devi's sale deed.
4. In the case of *Bhaskar Lindre vs. State of Maharashtra* (2017), the Supreme Court emphasized that allegations of forgery or tampering must be supported by clear and convincing evidence, directly impacting Ramesh Kumar's ability to defend his claims against Meera Devi.

LEGAL BASIS:

1. Section 17 of the Registration Act, 1908: This section mandates that all transactions affecting immovable property must be registered to be valid against third parties. Meera Devi's registered sale deed serves as prima facie evidence of her ownership, reinforcing her claim against Ramesh Kumar's later assertions regarding the land.
2. Section 53 of the Transfer of Property Act, 1882: This section addresses the doctrine of notice and provides that a subsequent transferee cannot claim rights over property if they are aware of prior claims. If Meera Devi can prove that Ramesh Kumar tampered with the deed, any subsequent claims he made, including the gift to his nephew, would be invalid due to his knowledge of her prior ownership.
3. Article 300A of the Indian Constitution: This article guarantees the right to property and stipulates that no person shall be deprived of their property save by authority of law. Meera

Devi's ownership claim, supported by her registered sale deed, is protected under this constitutional provision, ensuring that she cannot be dispossessed without due process.

4. Section 101 of the Indian Evidence Act, 1872: This section places the burden of proof on the party who asserts the existence of any fact. In this case, Ramesh Kumar bears the burden to disprove Meera Devi's allegations of tampering with the deed. If she presents credible evidence of tampering, it will shift the burden back to him to substantiate his claims regarding the validity of any alterations made to the deed.

PRAYERS:

In light of the above, I most respectfully pray that:

1. That the Honorable Court affirms Meera Devi's ownership of the entire land parcel as per the original registered sale deed executed by Ramesh Kumar, thereby invalidating any subsequent claims made by Ramesh Kumar, including the alleged gift to his nephew.
2. That the Honorable Court orders a forensic examination of the original sale deed to determine the authenticity of the document and to investigate the allegations of tampering, with the findings to be submitted within a period of 60 days from the date of this order.
3. That the Honorable Court directs Ramesh Kumar to provide clear and convincing evidence to substantiate his claims regarding the validity of any alterations made to the sale deed within 30 days of the Court's ruling on this matter.

DOCUMENTS ENCLOSED:

1. Original registered sale deed executed by Ramesh Kumar in favor of Meera Devi
2. Affidavit from witnesses present during the signing of the sale deed, attesting to its authenticity and any potential tampering
3. Forensic analysis report detailing handwriting comparisons and alterations made to the original sale deed
4. Documentation of continuous possession of the land by Meera Devi, including tax receipts, utility bills, and photographs of the property
5. Legal opinion letter from a property law attorney outlining the implications of the case law cited and the strength of Meera Devi's ownership claim

I hereby declare that the information provided above is true to the best of my knowledge and belief.

Date: 18 May, 2025

Place: kumarswamy layout

Yours faithfully,

arpit

Contact: 7319738343

Address: kumarswamy layout