NIVIXPE PRIVATE LIMITED
COMPREHENSIVE LEGAL BRIEF FOR LAWYER
Complete Project Description + Technical Documentation + Legal Compliance Framework
Testing Phase Launch Authorization Package

Document Date: December 27, 2025
Company: NivixPe Private Limited
Founder: Pasupuleti Sahith Kumar
Status: Incubated at Bennett Hatchery, Bennett University
Purpose: Complete Brief for Lawyer - Testing Phase Legal Authorization
Confidentiality: Attorney-Client Privileged

January 6, 2026

Contents

1 SECTION 1: EXECUTIVE SUMMARY FOR LAWYER

1.1 1.1 Project Overview in Simple Terms

Dear Lawyer,
Please find enclosed our complete project brief, technical documentation, compliance framework, and CA certification. We are requesting your professional legal opinion and affidavit to authorize our testing phase launch.
What NivixPe Does (In Simple Terms):
NivixPe is a **blockchain-based money transfer platform**. Think of it as:
Traditional Way (Current Problem):
- Person A wants to send 1,00,000 from India to a relative in USA
- Traditional bank: Takes 3-5 days, charges 3,000-5,000 fees (5-10% fee)
- Process: Complex, slow, expensive
NivixPe Solution:
- Person A deposits 1,00,000 via Razorpay (normal payment gateway)
- Gets cryptocurrency token equivalent on Solana blockchain
- Sends token internationally (takes 2 seconds)
- Recipient converts token back to USD
- Total time: ¡2 minutes, fees: ¡0.01(0.82)
Technology: $Uses Solana blockchain (like Bitcoin but faster) to record the transfer$
Business Model: $We charge small fee (0.5 - 1\% = 500 - 1000) for the service$
Legal Classification: $We are a PAYMENT SERVICE PROVIDER, NOT a cryptocurrency exchange$

1.2 1.2 Why We Need This Legal Affidavit

We are launching a **TESTING PHASE** with:
- 10-50 test users (internal/invited only)
- 30-60 day testing duration
- NO REAL MONEY (test tokens only)
- NO COMMERCIAL REVENUE
- Technology validation only
We need your legal affidavit confirming:
1. Testing phase is LEGAL under Indian law
2. We follow all applicable regulations (FEMA, RBI, PMLA, DPDPA, etc.)
3. We have no violations of cryptocurrency laws
4. We can legally proceed with testing

2 SECTION 2: COMPANY DESCRIPTION & BACKGROUND

2.1 2.1 Company Information

Legal Name: NIVIXPE PRIVATE LIMITED
Company Type: Private Limited Company
Registration: Ministry of Corporate Affairs (MCA)
Registered With: Register Karo (MCA filing partner)
Company Details:
- Incorporated: 06 October 2025
- CIN: U66190TS2025PTC204828
- Registered Office: 76 RAMACHANDRA, GUDEM, Miryalguda, Miryalguda, Nalgonda- 508207, Telangana
- Company Status: Active and in good standing
Founder Information:
- Name: Pasupuleti Sahith Kumar
- Qualification: Bachelor of Technology (Computer Science)
- University: Bennett University, Greater Noida

- Role: Founder & CEO (Chief Executive Officer)
Incubation Status:
- Incubator: Bennett Hatchery (Bennett University)
- Status: Incubated Startup
- Support: University infrastructure, mentorship, networking
- NOC (No Objection Certificate): Obtained from Bennett University

2.2   2.2 Government Recognition & Funding

DPIIT Recognition:
- Recognized Startup under Startup India Initiative
- Ministry of Commerce & Industry (Government of India)
- Recognition Benefits: Tax holidays, compliance exemptions
- Letter: Attached (Enclosure A)
SISFS Funding:
- Startup India Seed Fund Scheme
- Government-backed seed funding
- Fund Amount: 11,00,000
- Purpose: Technology development and product launch
- Status: Funds received and properly accounted
- Documentation: Attached (Enclosure B)
Current Financial Position:
- Bank Account: Opened in company name
- Bank: HDFC Bank
- Account Status: Active and operational
- Fund Balance: 11,00,000 as on date
- Documentation: Bank statement attached (Enclosure C)

3   SECTION 3: WHAT NIVIXPE DOES - DETAILED EXPLANATION

3.1   3.1 Business Purpose

Problem NivixPe Solves:
Current cross-border remittance system has these problems:
1. **High Costs:** Banks charge 5-10% fees on remittances
2. **Slow Processing:** 3-5 days to receive money
3. **Limited Accessibility:** Not available 24/7, requires bank account
4. **Inefficiency:** Multiple middlemen increase complexity
Market Size:
- Global remittance market: $700+ billion annually
- India receives: $100+ billion annually in remittances
- Opportunity: Significant market with millions of users

3.2   3.2 How NivixPe Works - Step by Step

Step 1: User Registration

```
User visits NivixPe website

Fills basic information (name, email, phone)

KYC verification (verify identity with government ID)

Account created and verified
```

Step 2: Deposit INR (Indian Rupees)

```
User goes to "Deposit" section

Enters amount (e.g.,  1 ,00,000)

Clicks "Pay via Payment Gateway"

Razorpay payment gateway opens

User pays using any payment method (bank transfer, card, UPI)

Gateway confirms payment

Money goes to NivixPe's settlement account

User account credited
```

Step 3: Get Cryptocurrency Tokens

```
NivixPe smart contract processes transaction

Equivalent cryptocurrency tokens minted

Tokens sent to user's wallet address

User sees balance in their wallet

User can send tokens internationally
```

Example:

```
User deposits:  1 ,00,000
Token price: 1 token =   100
User receives: 1,000 tokens
```

Step 4: Send Money Internationally

```
User recipient's wallet address: 5H9...xyz (USA-based)

User sends 1,000 tokens to recipient

Transaction on Solana blockchain (2 seconds)

Recipient receives 1,000 tokens in their wallet

Recipient's wallet updated immediately
```

Step 5: Withdraw as Foreign Currency

```
Recipient selects USD (US Dollars)

System converts token amount to USD (at current exchange rate)

USD sent to recipient's US bank account via Circle (Settlement Partner)

Recipient receives USD (within 5 minutes)
```

Complete Flow Example:

```
Start: Person A in India wants to send money to Person B in USA
Day 1:
- Person A deposits  1 ,00,000 via Razorpay
- Gets 1,000 NIVIX tokens
- Sends tokens to Person B (2 seconds)
- Person B converts to USD (rate: 1 token =   100   = $1.20)
- Gets $1,200 equivalent
- USD transferred to bank account
Result:
- Time: 1-5 min (vs 3-5 days traditional)
- Cost:  1 ,000 fee (1\%) vs   5 ,000-10,000 traditional
- Result: Person B gets $1,200 vs traditional $1,180
Savings: $20 + 2-4 days faster = HUGE BENEFIT
```

3.3   3.3 Revenue Model

How NivixPe Makes Money:
1. **Transaction Fee:** 0.5-1% on each transfer
- Example: 1,00,000 transfer → 500-1,000 fee
- Business keeps fee as revenue
2. **Exchange Rate Spread:** Small margin on currency conversion
- Example: We buy USD at 83.50, sell at 84
- Margin: 50 paise per dollar
3. **Liquidity Pool:** Interest on idle funds
- Example: Users' funds waiting for withdrawal earn interest
Revenue During Testing Phase:
- Testing phase: ZERO revenue (no real transactions)
- No fees charged during testing
- Testing is for technology validation only

3.4   3.4 Key Differentiators

Why NivixPe is Better:
1. **Speed:** ¡2 minutes vs 3-5 days traditional
2. **Cost:** ¡1% vs 5-10% traditional banks
3. **24/7 Availability:** No banking hours restriction
4. **Transparency:** Blockchain verifiable transactions
5. **Security:** Cryptographic security + regulation compliance
6. **Accessibility:** Anyone with internet access

4   SECTION 4: TECHNICAL ARCHITECTURE

4.1   4.1 Technology Stack Overview

Frontend (User Interface):

```
React.js (web framework)
      User registration form
      Deposit interface
      Wallet display
      Transaction history
      KYC verification flow
      Support & help sections
Deployment: Vercel (cloud hosting)
Security: HTTPS, encrypted data transmission
```

Backend (Business Logic):

```
Node.js + Express.js (server)
        User authentication
        Transaction processing
        Payment gateway integration
        Smart contract interaction
        Exchange rate calculation
        Compliance monitoring
Deployment: VPS/Cloud server
Security: TLS encryption, access controls
```

Blockchain - Solana (Public Ledger):

```
Solana Network - Devnet (Testing)
        Smart contract: NIVIX Protocol
        Programming language: Rust (Anchor framework)
        Smart contract deployed at: FavSaLCcw6qgpLob47uGPoNhJRsGjBMB1tSb7CZTavbw
        Token standard: SPL (Solana Program Library)
        Supported tokens: USD, INR, EUR, GBP, JPY, CAD, AUD
        Status: Testing (Devnet) - NOT mainnet
Features:
- Instant token minting (on deposit)
- Instant token burning (on withdrawal)
- Transfer verification
- Immutable transaction records
- Decentralized settlement
```

Private Ledger - Hyperledger Fabric (Compliance):

```
Hyperledger Fabric - Private Network
        Purpose: KYC/AML compliance tracking
        Data stored: User KYC documents, risk scores, compliance flags
        Smart contract (chaincode): nivix-kyc (Go/JavaScript)
        Data security: Private data collections (encrypted)
        Access: Only authorized compliance team
        Audit trail: Immutable record of all KYC events
Features:
- User identity verification
- Risk scoring
- Suspicious activity flagging
- Compliance history tracking
- Audit trail generation
```

Payment Gateway Integration:

```
Razorpay Test Mode (for testing)
        Purpose: INR deposit collection
        Payment methods: Bank transfer, cards, UPI, Wallet
        Webhook handling: Real-time transaction confirmation
        Security: PCI-DSS compliant
        Testing: Using Razorpay sandbox API
        Production: Switch to live mode after testing
Circle (for payouts)
        Purpose: USD/other currency transfer to recipient banks
        Supported: international transfers
        Compliance: Global Licenses guidelines adherence
```

4.2   4.2 Data Flow Architecture

User Registration Flow:

```
User Input
```

```
Frontend (React)

Backend API (Node.js)

Hyperledger Fabric (KYC storage)

Database (User account created)

Email confirmation

Account activated
```

Deposit Flow:

```
User selects deposit amount

Frontend redirects to payment gateway

User completes payment

Razorpay confirms payment

Webhook triggers Backend API

Backend processes deposit

Smart contract mints tokens

Tokens sent to user account

Frontend updated (user sees balance, UTR)
```

Transfer Flow:

```
User enters recipient wallet address

Frontend validates address

User confirms amount

Backend initiates transaction

Smart contract processes on Solana

Tokens transferred to recipient

Solana blockchain confirms

Both users notified

Transaction recorded
```

Withdrawal Flow:

```
Recipient selects currency (USD, etc.)

System calculates equivalent amount

User confirms recipient bank account

Backend initiates withdrawal

Smart contract burns tokens
```

```
Circle processes payout

Bank transfer initiated

Recipient receives funds

Compliance logged in Hyperledger
```

4.3 4.3 Security Features

Data Protection:

```
Encryption at Rest:
- Database: AES-256 encryption
- Backups: Encrypted backups
- Storage: Secure cloud storage
Encryption in Transit:
- HTTPS: TLS 1.2+
- API: Secure websockets
- Blockchain: Cryptographic signing
```

Access Control:

```
Role-Based Access Control (RBAC):
- Admin: Full access
- Compliance Officer: KYC/AML access only
- User: Own account access only
- Support: Ticket management only
```

Audit & Logging:

```
Comprehensive Logging:
- User login/logout: All logged
- Transaction initiation: All logged
- Compliance checks: All logged
- Admin actions: All logged
- Error logging: All errors recorded
- Retention: 90 days minimum (testing phase)
```

Security Testing Plan:

```
Pre-Launch Testing:
- Penetration testing: Scheduled
- Vulnerability scanning: OWASP Top 10
- SQL injection testing: Comprehensive
- XSS testing: Frontend testing
- CSRF testing: State management testing
- API testing: Endpoint security
```

4.4 4.4 Blockchain Technology Details

Why Solana Blockchain?
1. **Speed:** 65,000+ transactions per second
- Bitcoin: 7 tps
- Ethereum: 30 tps
- Solana: 65,000+ tps
- Best for remittances with high volume
2. **Cost:** ¡0.001 per transaction
$- Bitcoin: \$1 - 5 per transaction$

$- Ethereum : \$5 - 50 per transaction$
$- Solana :$ <0.001 per transaction
- Affordable for small transfers
3. **Finality:** 2-3 seconds confirmation
- Users see transactions confirmed instantly
- No waiting for blockchain confirmation
4. **Decentralization:** Fully decentralized network
- No single point of failure
- Censorship-resistant
- Transparent and verifiable

Smart Contract Details:

```
Contract: NIVIX Protocol
Language: Rust (Anchor framework)
Purpose: Token management and transfers
Functions:
  1. Mint tokens (when user deposits)
  2. Burn tokens (when user withdraws)
  3. Transfer tokens (user to user)
  4. Query balance (check user balance)
  5. Pause/resume (emergency freeze capability)
Deployment:
- Testnet: FavSaLCcw6qgpLob47uGPoNhJRsGjBMB1tSb7CZTavbw (Devnet)
- Mainnet: To be deployed after testing and audit
Audit Status: Pre-launch security audit pending
```

Token Economics:

```
Token: NIVIX
Standard: SPL Token (Solana Program Library)
Decimals: 8 (like Bitcoin)
Supply: Unlimited (minted on demand)
Value: Pegged to fiat currency
  - 1 NIVIX-USD = 1 USD
  - 1 NIVIX-INR = 1 INR
  - etc.
Use Case: Settlement token for remittances
```

5   SECTION 5: REGULATORY COMPLIANCE FRAMEWORK

5.1   5.1 Applicable Indian Laws & Regulations

NivixPe Complies With:

5.1.1   Law 1: Prevention of Money Laundering Act (PMLA), 2002

What It Says:
- "All businesses handling virtual digital assets must comply with AML rules"
- "Businesses must register with FIU-IND"
- "Businesses must do KYC of all users"
- "Suspicious transactions must be reported"

NivixPe's Compliance:

```
Testing Phase Status:
- FIU-IND registration: Not required yet (no real users)
- KYC: Simplified KYC for test users only
- STR reporting: System ready (template prepared)
```

```
- Compliance: Testing is not commercial = not subject yet
Production Phase Status:
- FIU-IND registration: MANDATORY (before accepting real users)
- Full KYC: Required for all users
- STR reporting: Monthly/quarterly as needed
- Record keeping: 5 years mandatory
- Compliance officer: Must be appointed
```

Enclosure: CA Compliance Certificate confirms PMLA readiness (Enclosure D)
—

5.1.2   Law 2: Foreign Exchange Management Act (FEMA), 1999

What It Says:
- "Cross-border money transfers subject to FEMA rules"
- "Annual limit per person: $250,000 (LRS - Liberalized Remittance Scheme)"
- "Form TCS required for outward remittances"
- "Currency controls must be followed"

NivixPe Compliance:

```
Testing Phase Status:
- FEMA compliance: Not applicable (no real transfers)
- LRS limits: Not relevant (test only)
- Forms: Not needed (no real transfers)
- Compliance: Testing phase exempt
Production Phase Status:
- LRS tracking: Built into system
- User limit enforcement:  20 ,83,000/year per user ($250,000)
- Form generation: TCS form auto-generated
- Recipient verification: Documented
- Reporting: To RBI as required
```

Implementation:

```
System Feature:
- User dashboard shows: "Remaining remittance limit: $X"
- Automatic blocking: If user tries to exceed $250,000/year
- Documentation: Forms generated and provided to user
- Compliance: All transfers logged for RBI reporting
```

Enclosure: FEMA compliance framework (Enclosure E)
—

5.1.3   Law 3: Reserve Bank of India (RBI) Banking Regulations

What It Says:
- "Banks cannot serve cryptocurrency businesses"
- "Payment services must be regulated"
- "Banking relationships require explicit approval"

NivixPe's Position:
- We are NOT a cryptocurrency exchange (we don't trade crypto)
- We are a PAYMENT SERVICE PROVIDER (like Razorpay)
- Our banking is through licensed payment providers (Razorpay, AD II partners)

NivixPe's Compliance:

```
Testing Phase Status:
- RBI license: Not required (testing only)
```

```
- Banking: Via Razorpay (RBI-licensed payment aggregator)
- Compliance: Razorpay handles banking compliance
- Status: Fully compliant through partner
Production Phase Status:
- RBI classification: To be determined (PA vs VDASP)
- Banking relationship: Maintained through Razorpay
- Compliance framework: Submit to RBI for approval
- Authorization: May require RBI formal approval
```

Enclosure: RBI compliance framework (Enclosure F)

—

5.1.4   Law 4: Income Tax Act, 1961

What It Says:
- "Cryptocurrency transactions are taxable"
- "Section 115BBH: 30% flat tax on VDA gains"
- "Section 194S: 1% TDS on VDA transfers"
- "TDS must be deducted and filed"
NivixPe's Compliance:

```
Testing Phase Status:
- User taxes: N/A (test users, no real value)
- Company taxes: Zero income (testing phase, no revenue)
- TDS: N/A (no taxable transactions)
- Tax filing: Not required (no taxable activity)
Production Phase Status:
- User tax responsibility: Each user pays 30% on gains
- TDS deduction: NivixPe deducts 1% on transfers
- Form 16A: Issued to users annually
- Company income tax: 25-30% corporate tax on revenue
- Advance tax: Paid quarterly
- Annual ITR: Filed by March 31
```

System Implementation:

```
TDS System:
1. User initiates transfer > 50  ,000
2. System calculates 1% TDS
3. TDS deducted from user's amount
4. User receives net amount (after TDS)
5. TDS deposited with government
6. Quarterly TDS returns filed
7. Annual Form 16A issued
Example:
User transfer:   1  ,00,000
TDS (1%):   1  ,000
User receives:   99  ,000
TDS to government:   1  ,000
```

Enclosure: CA Certificate on tax compliance (Enclosure G)

—

5.1.5   Law 5: Digital Personal Data Protection Act (DPDPA), 2023

What It Says:
- "All personal data must be protected"
- "User consent required before data collection"
- "Data encryption mandatory"

- "Users have right to access, correction, deletion"
- "Data breaches must be reported within 72 hours"
NivixPe's Compliance:

```
Testing Phase:
- Encryption: AES-256 at rest, TLS in transit
- User consent: Obtained before testing
- Data protection: Comprehensive measures
- User rights: Implemented (access, correction, deletion)
- Data deletion: Post-testing automatic deletion
Compliance Evidence:
- Privacy policy: Attached (Enclosure H)
- Data security architecture: Attached (Enclosure I)
- User consent form: Attached (Enclosure J)
```

Data Protection Measures:

```
Data at Rest:
- Database: AES-256 encryption
- Backups: Encrypted storage
- Access: Role-based controls
- Audit: Logging of all access
Data in Transit:
- Connections: TLS 1.2+ only
- APIs: HTTPS encryption
- Blockchain: Cryptographic signing
Data Retention:
- Testing phase: Deleted after 30 days
- Production: Retained as per law
- KYC data: 5 years (PMLA requirement)
- Logs: 1 year minimum
```

Enclosure: DPDPA compliance certificate (Enclosure K)

—

5.1.6   Law 6: Goods and Services Tax (GST) Act, 2017

What It Says:
- "Service charges are taxable at 18% GST"
- "GST registration required for businesses"
- "Monthly/quarterly GST returns mandatory"
NivixPe's Compliance:

```
Testing Phase Status:
- GST registration: Not required (zero revenue)
- GST returns: Not applicable (no taxable supplies)
- GST tax: N/A (testing only)
Production Phase Status:
- GST registration: Mandatory after testing
- GST rate: 18% on service charges
- Monthly GSTR-1: Filed by 11th of next month
- Quarterly GSTR-3B: Filed by 20th of next month
- Annual GSTR-9: Filed by 31st December
- Input tax: Claimed on eligible expenses
Example:
Service fee:   1 ,000
GST (18%):    180
Total charge:  1 ,180
NivixPe receives:   1 ,000 (GST to government)
```

Enclosure: GST compliance readiness (Enclosure L)
—

5.1.7 Law 7: Companies Act, 2013

What It Says:
- "Companies must maintain proper governance"
- "Board meetings required, minutes documented"
- "Annual returns filed with MCA"
- "Financial statements prepared per Ind-AS"
- "Statutory audit required (in some cases)"

NivixPe's Compliance:

```
Current Status:
- Incorporation: Completed with MCA
- Directors: Properly appointed
- Board resolutions: Documented
- Bank account: Opened in company name
- Financial records: Maintained per standards
Ongoing Compliance:
- Board meetings: Quarterly (or as needed)
- Minutes: Documented and filed
- Annual returns: Filed annually by due date
- Financial statements: Prepared per Ind-AS
- Audit: Statutory audit if turnover > 1   crore
```

Enclosure: Companies Act compliance certificate (Enclosure M)
—

5.2 5.2 Cryptocurrency Laws in India

Current Legal Status (2025):
What is Legal:
Holding cryptocurrency (personal portfolio)
Trading cryptocurrency on registered exchanges
Mining cryptocurrency (no explicit prohibition)
Building crypto applications
Using blockchain technology
What Requires Compliance:
Operating as VDASP (VDA Service Provider)
Managing customer funds
Facilitating VDA transfers
On-ramp/off-ramp services
NivixPe Classification:
- NOT: Cryptocurrency miner
- NOT: Cryptocurrency exchange (trader)
- YES: Payment service provider (VDA-related)
- YES: On-ramp/off-ramp service provider
- YES: Cross-border payment facilitator
NivixPe's Legal Standing:
- Technology: Legal and permitted
- Business model: Legal (payment service)
- Testing phase: Legal (no real transactions)
- Production phase: Requires FIU-IND registration + RBI approval
Enclosure: RBI & cryptocurrency regulatory status (Enclosure N)

6   SECTION 6: TESTING PHASE SPECIFICATIONS

6.1   6.1 Testing Phase Parameters

Testing Duration: 30-90 days (defined end date)
Test Users:
- Count: 10-50 internal/invited testers
- Who: Company team, selected partners, early adopters
- Qualification: Must sign NDA and testing terms
- Access: Limited API access, no public availability
Technology Deployment:

```
Frontend: React dev environment (not production)
Backend: Node.js dev server (not production)
Blockchain: Solana DEVNET only (NOT mainnet)
Payments: Razorpay TEST MODE (not live)
Database: Test database (will be wiped)
Credentials: Test API keys (not production)
```

Testing Scope:

```
What We Test:
    User registration flow
    KYC verification process
    Deposit functionality
    Token minting
    Token transfer
    Withdrawal functionality
    Exchange rate accuracy
    UI/UX experience
    System stability
    Security controls
    Error handling
What We Don't Test:
    Real fund transfers
    Production scale
    Compliance reporting
    Full audit procedures
    Regulatory filing
```

Data Handling:

```
Data Collection:
- Test user name, email, phone: Collected
- Test KYC documents: Submitted (test only)
- Test transactions: Recorded
- System logs: Generated
Data Protection:
- Encryption: Yes, full encryption
- Access control: Role-based
- Audit logs: Complete logging
Data Deletion:
- Schedule: 30 days after testing ends
- Procedure: Complete data wipe
- Verification: Certified deletion
- Backups: Also deleted
```

Enclosure: Testing phase plan (Enclosure O)

7   SECTION 7: CA COMPLIANCE CERTIFICATIONS ATTACHED

7.1   7.1 CA's Authorization Letter

Status: ATTACHED (Enclosure D)
Contains:
- Company registration verification
- Tax registration confirmation (PAN, TAN)
- Banking compliance verification
- Financial position statement
- Compliance status certification
- Authorization for testing phase
- CA's professional credentials and ICAI membership

CA Details:
- Name: John Doe CA
- ICAI Membership: 123456
- Certificate of Practice: COP7890
- Years of Experience: 10 years
- Firm: Doe & Co CA Firm
- Contact: +91-9876543210 & john@doeca.com

7.2   7.2 CA's Compliance Affidavit

Status: PREPARED (Enclosure P)
Contents:
- Affidavit under penalty of perjury
- All registrations verified
- Tax compliance certified
- Financial governance verified
- Statutory compliance confirmed
- Testing phase authorized
- Professional liability statement

Executed: On CA firm letterhead with official seal and signature

7.3   7.3 Investor Credibility Documents

Status: PREPARED
Attached:
- Company legitimacy certificate (Enclosure Q)
- Tax compliance certificate (Enclosure R)
- Financial position statement (Enclosure S)
- Bank account verification (Enclosure T)
- Statutory compliance summary (Enclosure U)

8   SECTION 8: TECHNICAL DOCUMENTATION ATTACHED

8.1   8.1 Architecture Documentation

Attached:
- System architecture diagram (Enclosure V)
- Data flow diagrams (Enclosure W)
- Database schema (Enclosure X)
- API documentation (Enclosure Y)
- Smart contract code review (Enclosure Z)

8.2   8.2 Security Documentation

Attached:
- Security architecture (Enclosure AA)
- Data encryption procedures (Enclosure AB)
- Access control design (Enclosure AC)
- Incident response plan (Enclosure AD)
- Security testing checklist (Enclosure AE)

8.3   8.3 Compliance Documentation

Attached:
- KYC/AML framework (Enclosure AF)
- Privacy policy (Enclosure AG)
- Data protection procedures (Enclosure AH)
- Compliance monitoring system (Enclosure AI)
- Risk assessment matrix (Enclosure AJ)

9   SECTION 9: WHAT LAWYER NEEDS TO VERIFY & CONFIRM

9.1   9.1 Verification Checklist for Lawyer

Company Registration (Verify with MCA):
- [ ] Company name correct: NIVIXPE PRIVATE LIMITED
- [ ] CIN number verified: U66190TS2025PTC204828
- [ ] Date of incorporation: 06 October 2025
- [ ] Directors properly appointed: LANKALAPALLY HARSHA ABHAY, etc.
- [ ] Company status: Active

Tax Registrations (Verify with IT Department):
- [ ] PAN obtained: AAKCN9131C
- [ ] TAN obtained: HYDN15983C
- [ ] PAN-Aadhaar linked: Yes
- [ ] No tax violations: Confirmed
- [ ] No tax disputes: Confirmed

Financial Status (Verify with Bank):
- [ ] Bank account operational: Yes
- [ ] Account in company name: Yes
- [ ] Account type: Current
- [ ] Specimen signature verified: Yes
- [ ] No fraud flags: Confirmed

Compliance Framework (Verify with Documentation):
- [ ] PMLA readiness: Documented
- [ ] FEMA compliance: Framework prepared
- [ ] RBI compliance: Planned
- [ ] DPDPA compliance: Implemented
- [ ] GST readiness: Prepared
- [ ] Companies Act: Compliant
- [ ] Technology legal: Authorized

Testing Phase (Verify with Project Documents):
- [ ] Testing scope: Clear and limited
- [ ] No real money: Confirmed
- [ ] Test users: 10-50 only
- [ ] Duration: 30-60 days
- [ ] Data deletion: Procedure documented
- [ ] Compliance: Minimal (appropriate for testing)

9.2   9.2 Legal Opinion Required From Lawyer

Lawyer Should Provide:

9.2.1   Opinion 1: Company is Legal in India

```
"NivixPe Private Limited is a legally registered, properly constituted company
under Indian law, with all required registrations and compliance measures in place.
The company can legally conduct business in India."
```

9.2.2   Opinion 2: Testing Phase is Legal

```
"NivixPe's closed beta testing phase (non-commercial, no real money, 30-60 days,
test users only) is legal under Indian law and does not violate PMLA, FEMA, RBI
regulations, or other applicable laws."
```

9.2.3   Opinion 3: Technology is Legal

```
"The use of blockchain technology (Solana), smart contracts, and cryptocurrency
tokens for remittance settlement is legal and does not violate any Indian law."
```

9.2.4   Opinion 4: Business Model is Legal

```
"NivixPe's business model as a payment service provider facilitating cross-border
transfers using blockchain is legal and complies with applicable regulations
(subject to regulatory approval for production phase)."
```

9.2.5   Opinion 5: Regulatory Compliance is Proper

```
"NivixPe demonstrates proper understanding and compliance with applicable
regulations (PMLA, FEMA, RBI, Income Tax, DPDPA, GST, Companies Act) and has
prepared appropriate compliance frameworks for production phase."
```

9.2.6   Opinion 6: Authorization for Testing Phase

```
"NivixPe is legally authorized to proceed with testing phase launch without
requirement for FIU-IND, RBI, or GST registrations at this stage. These will be
obtained before production phase."
```

10   SECTION 10: LEGAL AFFIDAVIT TEMPLATE FOR LAWYER

10.1   10.1 Complete Affidavit Format

LAWYER SHOULD PREPARE THIS AFFIDAVIT:

—

```
[LAWYER LETTERHEAD]
[Advocate John Doe, Bar License Number 12345, Law Firm Address]


LEGAL OPINION & AFFIDAVIT
Testing Phase Authorization & Regulatory Compliance Certification
```

```
Date: January 6, 2026
TO: NivixPe Private Limited
    76 RAMACHANDRA, GUDEM, Miryalguda, Miryalguda, Nalgonda- 508207, Telangana
    Attn: Pasupuleti Sahith Kumar, Founder
RE: Legal Opinion & Affidavit - Testing Phase Authorization
    Complete Regulatory Compliance Certification
    Blockchain-Based Cross-Border Payment Platform


---
## I. DECLARATION OF AUTHORITY
I, Advocate John Doe, holding Bar Council License No. 12345,
having 15 years of experience in financial law, technology law, and
cryptocurrency regulations in India, do hereby provide this legal opinion
and affidavit.
I am authorized legal representative of Doe Law Firm, registered with
Bar Council of India since 2010, specializing in fintech and technology law.
I have reviewed all relevant documentation, company registrations, technology
architecture, compliance framework, and regulatory requirements for NivixPe
Private Limited.
I am competent to provide legal opinion on Indian financial technology laws,
cryptocurrency regulations, and cross-border payment compliance.
---
## II. COMPANY VERIFICATION & LEGAL STATUS
### II.A Company Registration Certification
I have verified NivixPe Private Limited's registration with the Ministry of
Corporate Affairs (MCA) and certify:
    Company Name: NIVIXPE PRIVATE LIMITED (Correct)
    Company CIN: U66190TS2025PTC204828 - Verified with MCA
    Date of Incorporation: 06 October 2025 (Verified)
    Company Status: ACTIVE AND IN GOOD STANDING
    Registration Authority: Ministry of Corporate Affairs, India
    Company Type: Private Limited Company
    Registered Address: 76 RAMACHANDRA, GUDEM, Miryalguda, Miryalguda, Nalgonda- 508207,
    Telangana
**CERTIFICATION:** The company is LEGALLY REGISTERED and properly constituted
under Indian law.
### II.B Directors & Management Certification
I certify the following regarding company management:
    Directors Appointed: 1 qualified directors
    Director Details: All verified with MCA portal
    DINs (Director Identification Numbers): All verified (11330611)
    Disqualifications: NONE - All directors eligible
    Board Governance: Properly established
    Board Authority: Properly delegated
**CERTIFICATION:** Company management is PROPERLY CONSTITUTED per Companies Act 2013.
### II.C Shareholder & Capital Certification
I certify the following regarding company capitalization:
    Share Capital:  1 ,00,000 authorized
    Paid-up Capital:  1 ,00,000 (Verified with bank deposits)
    Shareholders: Properly documented
    Share Certificates: Issued as required
    Shareholding Structure: Documented and verified
**CERTIFICATION:** Company CAPITALIZATION IS PROPER per Companies Act 2013.
---
## III. TAX REGISTRATION & COMPLIANCE CERTIFICATION
### III.A Income Tax Compliance
I certify NivixPe's income tax compliance status:
    PAN (Permanent Account Number): AAKCN9131C - Verified with IT Department
    PAN Status: ACTIVE
    PAN-Aadhaar Linking: COMPLETED (per IT rules)
    TAN (Tax Deduction Account Number): HYDN15983C - For TDS management
    TAN Status: ACTIVE
    Tax Registration Date: 06 October 2025
**For Testing Phase:**
    Revenue: ZERO (No commercial operations)
```

```
    Tax Liability: NONE (Zero revenue = no tax)
    Tax Compliance: N/A for testing phase
    TDS Filing: Not applicable (no taxable transactions)
```
For Production Phase:
```
    TDS System: Designed (1% on transfers > 50 ,000)
    Form 16A: System ready for issuance
    Annual ITR: Procedure documented
    Compliance: READY for production
```
CERTIFICATION: Income tax compliance ADEQUATE for testing phase and
PREPARED for production phase.
III.B TDS Compliance Framework
I certify NivixPe's TDS compliance readiness:
TDS Obligation (Section 194S):
```
    1% TDS on virtual digital asset transfers > 50 ,000
    TAN obtained for TDS deduction
    TDS deposit mechanism: Ready
    Quarterly TDS returns (Form 24G): Procedure documented
    Form 16A issuance: System designed
    TDS record keeping: 5-year retention planned
```
CERTIFICATION: TDS compliance framework is PROPER and READY for production.
III.C User Tax Responsibility Clarification
I certify that regarding user taxes:
Section 115BBH Tax Obligation:
```
    30% flat tax on VDA gains (user responsibility)
    NivixPe's role: Deduct 1% TDS, issue Form 16A
    User's role: Pay remaining tax in annual ITR
    Platform's responsibility: Provide transaction records
```
CERTIFICATION: User tax obligations properly DOCUMENTED and COMMUNICATED.

IV. REGULATORY COMPLIANCE CERTIFICATION
IV.A PMLA (Prevention of Money Laundering Act) 2002 Compliance
I CERTIFY REGARDING PMLA COMPLIANCE:
Testing Phase:
```
    FIU-IND Registration: NOT REQUIRED (no real transactions)
    Testing Classification: R&D activity, not regulated
    KYC Requirement: Simplified for test users only
    STR Filing: Not applicable (no suspicious transactions)
    Compliance Status: EXEMPT during testing phase
```
Production Phase Readiness:
```
    FIU-IND Registration: MANDATORY before commercial launch
    Full KYC System: Designed and ready
    STR Filing Mechanism: Documented
    5-year Record Keeping: Procedure established
    Compliance Officer: Plan to appoint before production
    Compliance Status: PREPARED for FIU-IND registration
```
LEGAL OPINION: PMLA compliance NOT REQUIRED for testing phase. NivixPe
is LEGALLY AUTHORIZED to proceed with testing. FIU-IND registration required
before production.
IV.B FEMA (Foreign Exchange Management Act) 1999 Compliance
I CERTIFY REGARDING FEMA COMPLIANCE:
Testing Phase:
```
    FEMA Application: NOT APPLICABLE (no real foreign exchange transfers)
    LRS Limits: Not relevant to testing
    Cross-border Compliance: Not triggered
    Currency Controls: Not applicable
    Compliance Status: EXEMPT during testing phase
```
Production Phase Readiness:
```
    LRS Limit Enforcement: $250,000/year per person - BUILT INTO SYSTEM
    Form TCS Generation: Automated system designed
    Recipient Verification: Documented procedures
    Cross-border Tracking: System implemented
    RBI Reporting: Procedure documented
    Compliance Status: READY for production
```
Specific FEMA Compliance:
```
    Outward remittance limits: Enforced in system
    Beneficiary documentation: Captured at withdrawal
    Currency declaration: User confirms currency selection
    Compliance logging: All transfers logged for RBI
```

LEGAL OPINION: FEMA compliance NOT REQUIRED for testing phase. NivixPe is LEGALLY AUTHORIZED to proceed with testing. Full FEMA compliance READY for production.

IV.C RBI (Reserve Bank of India) Banking Regulations Compliance

I CERTIFY REGARDING RBI COMPLIANCE:

RBI Regulatory Framework:
    RBI regulates banks, payment providers, licensed entities
    RBI has NOT prohibited cryptocurrency technology
    RBI requires banking relationships be transparent
    RBI compliance: Managed through payment partners

NivixPe's Banking Compliance:
    Banking Partner: Razorpay (RBI-licensed payment aggregator)
    Circle: RBI-licensed for payouts
    Bank Account: Opened in company name (verified)
    Banking Relationship: Transparent and documented
    RBI Compliance: MAINTAINED through partners

Testing Phase:
    RBI License: NOT REQUIRED (testing only)
    Banking Relationship: Via Razorpay TEST MODE
    Compliance Status: COMPLIANT through partners

Production Phase:
    RBI Classification: VDASP (Virtual Digital Asset Service Provider)
    RBI Communication: Planned (if required)
    RBI Approval: To be obtained (if required)
    Banking Relationship: Will remain through Razorpay
    Compliance Status: READY for RBI engagement

LEGAL OPINION: RBI compliance NOT REQUIRED for testing phase via test payment gateway. NivixPe is LEGALLY AUTHORIZED to proceed with testing. RBI engagement PLANNED for production.

IV.D Income Tax Act Sections 115BBH \& 194S

I CERTIFY REGARDING INCOME TAX COMPLIANCE:

Section 115BBH (30\% VDA Tax):(If apply to this)
    Applies to: Individual users (not NivixPe during testing)
    Tax Rate: 30\% flat tax on VDA gains
    NivixPe's Role: Inform users, provide transaction records
    User's Role: Pay tax in annual ITR
    Testing Phase: Not applicable (zero user gains)
    Production Phase: User responsibility (NivixPe provides info)

Section 194S (1\% TDS):
    Applies to: NivixPe (payment platform)
    TDS Rate: 1\% on transfers > 50 ,000
    NivixPe's Role: Deduct TDS, deposit, file returns, issue Form 16A
    User's Role: Accept TDS credit in annual ITR
    Testing Phase: Not applicable (no transactions)
    Production Phase: MANDATORY, system ready

LEGAL OPINION: Income tax obligations are PROPER, DOCUMENTED, and TECHNICALLY IMPLEMENTED.

IV.E DPDPA (Digital Personal Data Protection Act) 2023 Compliance

I CERTIFY REGARDING DATA PROTECTION:

DPDPA Compliance Requirements:
    Data encryption: IMPLEMENTED (AES-256 at rest, TLS in transit)
    User consent: OBTAINED before testing
    Data purpose: CLEARLY DISCLOSED
    User rights: IMPLEMENTED (access, correction, erasure, grievance)
    Data breach notification: PROCEDURE DOCUMENTED
    Data retention: POLICY DEFINED

Testing Phase Specific:
    Encryption: Verified at AES-256 standard
    Test data only: No real personal information collected
    Data deletion: 30 days post-testing (automatic)
    Privacy notice: Provided to all test users
    User consent: Documented in testing agreement

LEGAL OPINION: DPDPA compliance FULLY IMPLEMENTED and VERIFIED. Testing phase is FULLY COMPLIANT.

IV.F GST Act 2017 Compliance

I CERTIFY REGARDING GST COMPLIANCE:

Testing Phase:
    GST Registration: NOT REQUIRED (zero revenue)

```
    GST Returns: Not applicable
    GST Tax: No taxable transactions
    Compliance Status: EXEMPT (zero revenue)
**Production Phase Readiness:**
    GST Registration: Planned before production
    GST Rate: 18\% on service fees (documented)
    Monthly GSTR-1: Procedure designed
    Quarterly GSTR-3B: System prepared
    Annual GSTR-9: Filing plan documented
    Compliance Status: READY for registration
**LEGAL OPINION:** GST compliance NOT REQUIRED for testing phase. NivixPe
is LEGALLY AUTHORIZED to proceed. PREPARED for production phase.
### IV.G Companies Act 2013 Compliance
**I CERTIFY REGARDING CORPORATE GOVERNANCE:**
    Incorporation: Properly completed with MCA
    Directors: Properly appointed and qualified
    Board governance: Established and documented
    Financial records: Maintained per standards
    Bank account: Opened in company name
    Annual compliance: Procedure established
**LEGAL OPINION:** Companies Act 2013 compliance FULLY ACHIEVED.
---
## V. TECHNOLOGY \& CRYPTOCURRENCY LAW CERTIFICATION
### V.A Blockchain Technology Legal Status
**I CERTIFY REGARDING BLOCKCHAIN TECHNOLOGY:**
**Current Legal Status in India:**
    Blockchain technology: LEGAL and permitted
    Smart contracts: LEGAL and permitted
    Cryptocurrency tokens: LEGAL to hold, transfer, trade
    DLT (Distributed Ledger Technology): LEGAL and encouraged
**NivixPe's Technology:**
    Solana Blockchain: Legitimate, regulated project
    Smart Contracts: Rust-based (standard programming)
    Hyperledger Fabric: Enterprise-grade, legally sound
    SPL Tokens: Standard blockchain tokens (legal)
**LEGAL OPINION:** NivixPe's blockchain technology is LEGAL, LEGITIMATE,
and PERMITTED under Indian law.
### V.B Cryptocurrency Regulation Legal Analysis
**I CERTIFY REGARDING CRYPTOCURRENCY REGULATIONS:**
**What is Legal in India:**
    Holding cryptocurrency
    Mining cryptocurrency
    Trading cryptocurrency (on registered platforms)
    Building crypto applications
    Using blockchain technology
**NivixPe's Position:**
    NOT a cryptocurrency miner: Correct
    NOT a cryptocurrency exchange: Correct
    NOT a Holding currency(Instant transfer)-Non custodial : Correct
    YES a payment service provider: Correct classification
    YES facilitating VDA transfers: Correct activity
**Regulatory Requirements:**
    For testing (non-commercial): MINIMAL requirements
    For production (commercial): FIU-IND registration + compliance
**LEGAL OPINION:** NivixPe's business model is LEGALLY SOUND, correctly
classified, and COMPLIANT with cryptocurrency regulations.
### V.C RBI Statement on Cryptocurrencies
**I CERTIFY REGARDING RBI POSITION:**
**RBI's Current Position (2025):**
    NOT prohibited: Cryptocurrency holdings not prohibited
    NOT banned: No cryptocurrency ban (Supreme Court 2020)
    REGULATED: Cryptocurrency service providers regulated
    BANKING: Banks can service crypto businesses (with compliance)
**NivixPe's Compliance with RBI:**
    Banking via licensed provider: Razorpay (RBI-licensed)
    Transparency: All banking relationships documented
    Compliance: Following RBI banking guidelines
    No violation: No RBI rules violated
```

LEGAL OPINION: NivixPe is COMPLIANT with RBI regulations and requirements.

VI. TESTING PHASE SPECIFIC LEGAL AUTHORIZATION

VI.A Testing Phase Legal Status

I CERTIFY THAT NIVIXPE'S TESTING PHASE:

    Is Legal: Closed beta testing with no real money is LEGAL
    Scope is Clear: 30-60 days, 10-50 test users, test data only
    Compliance is Minimal: Appropriate for testing stage
    Data Protection is Adequate: DPDPA compliant
    Risk is Managed: Testing agreement in place
    Regulatory Exemption: Testing exempt from commercial regulations

Specific Authorizations:

    Can operate without FIU-IND registration (testing only)
    Can operate without RBI authorization (testing only)
    Can operate without GST registration (zero revenue)
    Can operate without TDS filing (no transactions)
    Can use test payment gateway (Razorpay TEST MODE)
    Can deploy on Devnet (NOT mainnet)

VI.B Testing Phase Compliance Checklist

I CERTIFY COMPLIANCE WITH:

    PMLA: Testing exempt (appropriate KYC framework ready)
    FEMA: Testing exempt (framework ready for production)
    RBI: Testing exempt (banking via licensed partner)
    Income Tax: Testing exempt (zero revenue)
    DPDPA: COMPLIANT (encryption, consent, user rights)
    GST: Testing exempt (zero revenue)
    Companies Act: COMPLIANT (proper governance)

VII. LEGAL PROTECTIONS \& DEFENSES

VII.A Protection Against Legal Challenges

This affidavit provides protection against:

    Government Inquiries: If govt asks "Is this legal?", answer: "We have lawyer's affidavit authorizing this. Here is certified copy."
    Regulatory Questions: If RBI/tax authority asks, provide this affidavit plus show lawyer willing to testify.
    Investor Verification: If investors verify compliance, show lawyer's affidavit as professional verification.
    Legal Disputes: If sued, this affidavit proves you had professional legal advice and acted with due diligence.
    Regulatory Action: If regulatory body questions legality, affidavit proves professional legal verification was completed.

VII.B Court Admissibility

This affidavit is:

    Admissible as professional evidence in court
    Proof of legal compliance verification
    Proof of professional due diligence
    Credible evidence of lawful intent
    Supported by lawyer's credentials and insurance

VIII. SCOPE \& LIMITATIONS CERTIFICATION

VIII.A What This Affidavit Covers

Covers:

    Testing phase (30-90 days non-commercial)
    Company registration legality
    Tax compliance status
    Regulatory compliance analysis
    Technology legal status
    Authorization for testing
    Compliance framework assessment

Does NOT Cover:

    Production phase (separate affidavit required)
    FIU-IND registration approval (government domain)
    RBI authorization (government domain)
    Future regulatory changes (legal evolution)
    Technical security audit (technical domain)
    Business viability (business domain)

VIII.B Changes Requiring New Affidavit

New affidavit required if:

```
    Testing expands to real money
    More than 50 users participate
    Testing extends beyond 60 days
    Mainnet deployment considered
    Business model changes
    New laws passed
    Technology architecture changes
```

IX. PROFESSIONAL CREDENTIALS \& LIABILITY
IX.A Affiant's Professional Credentials
I Certify My Qualifications:
```
    Name: Advocate John Doe
    Bar Council License No.: 12345
    Law Firm: Doe Law Firm
    Experience: 15 years in financial law
    Specialization: Fintech, cryptocurrency, payment laws
    Qualification: LLB, LLM
    Bar Council: Bar Council of India
```
Verification Available:
```
    Verify license: Contact Bar Council of India
    Verify firm: Visit law firm office
    Verify experience: Request references
    Contact me: +91-9876543210 john@doelaw.com
```
IX.B Professional Liability \& Insurance
I Accept Professional Responsibility:
```
    Full professional liability for this opinion
    Professional indemnity insurance:  10 ,00,000 coverage active
    Errors \& omissions insurance: Current and valid
    Professional discipline: Subject to Bar Council rules
    Ethical obligations: Fully complied with
```

X. PROFESSIONAL AFFIDAVIT \& DECLARATION
I MAKE THIS AFFIDAVIT UNDER PENALTY OF PERJURY:
1. **I am duly qualified** as a lawyer with authority to provide legal opinion
2. **All information is accurate** - Verified with official records
3. **Compliance is verified** - Personal verification of all compliance
4. **No violations found** - NivixPe violates no applicable law
5. **Testing phase authorized** - Legally permitted to proceed
6. **Professional responsibility** - I accept full responsibility
7. **Insurance backed** - Professional liability insurance covers this opinion
8. **Document valid** - Valid for regulatory and legal purposes
---
XI. OFFICIAL AUTHORIZATION STATEMENT
I HEREBY OFFICIALLY AND LEGALLY AUTHORIZE:
       **NivixPe Private Limited is LEGALLY REGISTERED, PROPERLY CONSTITUTED, and
COMPLIANT with all applicable Indian laws.**
       NivixPe's Testing Phase is LEGAL and AUTHORIZED under Indian law.
       **NivixPe can LAWFULLY PROCEED with testing phase launch without requirement
for FIU-IND, RBI, or GST registrations (these required before production).**
       **NivixPe's blockchain technology, smart contracts, and business model are
LEGAL and COMPLIANT with Indian law.**
       **NivixPe follows PMLA, FEMA, RBI, Income Tax, DPDPA, GST, and Companies
Act requirements appropriately for testing stage.**
       **If any government agency questions NivixPe's legality, I am available to
provide additional documentation and professional evidence.**
       **This authorization is backed by professional indemnity insurance and
professional liability coverage.**

XII. CONTACT \& FOLLOW-UP
For Questions or Verification:
Lawyer Name: Advocate John Doe
Bar License: 12345
Phone: +91-9876543210
Email: john@doelaw.com
Office: Law Firm Address, City, India
Available for:
```
    Additional documentation
    Clarifications to authorities
```

```
     Testimony if required
     Expert opinion in legal proceedings
     Regulatory liaison
---
## XIII. OFFICIAL SIGNATURES \& SEALS
**EXECUTED \& CERTIFIED:**
-------------------------------------
Advocate John Doe
LLB, LLM
Bar Council License No.: 12345
Date: January 6, 2026
Place: New Delhi
Phone: +91-9876543210
Email: john@doelaw.com
**LAW FIRM AUTHORITY:**
-------------------------------------
Doe Law Firm/Senior Partner
Firm Registration No.: FRN6789
Official Seal of Law Firm
Date: January 6, 2026
**COMPANY ACKNOWLEDGMENT:**

-------------------------------------
Pasupuleti Sahith Kumar
Founder/Director
NivixPe Private Limited
Date: January 6, 2026
---
## XIV. ATTACHMENTS TO THIS AFFIDAVIT
**Attached Documents:**
A. Company Registration Certificate (Copy)
B. PAN Certificate (Copy)
C. TAN Certificate (Copy)
D. Bank Account Opening Certificate (Copy)
E. DPIIT Recognition Letter (Copy)
F. SISFS Fund Documentation (Copy)
G. CA Compliance Certificate (Enclosure)
H. Technical Architecture Diagram (Enclosure)
I. Privacy Policy (Enclosure)
J. Testing Agreement Template (Enclosure)
K. NDA Template (Enclosure)
L. Bar License Certificate (Copy)
M. Professional Indemnity Insurance Certificate (Copy)
N. Law Firm Registration Certificate (Copy)
---
**END OF LEGAL OPINION \& AFFIDAVIT**


This affidavit certifies 100% legal compliance and is fully backed by lawyer's
credentials, Bar Council license, and professional indemnity insurance.
**OFFICIAL COPY - CERTIFIED BY LAWYER**
```

—

11 SECTION 11: COMPREHENSIVE ENCLOSURES LIST

11.1 All Documents Your Lawyer Will Receive:

A. Company Registration Documents:
- [ ] Certificate of Incorporation (MCA)
- [ ] Company CIN & details (MCA portal)
- [ ] Director appointment letters
- [ ] Shareholder register
- [ ] Board resolutions
B. Tax Documents:

- [ ] PAN Certificate
- [ ] TAN Certificate
- [ ] Bank statements (3 months)
- [ ] CA compliance letter
- [ ] DPIIT recognition letter

C. Financial Documents:
- [ ] SISFS fund documentation
- [ ] Bank account opening certificate
- [ ] Fund utilization statement
- [ ] Financial position statement

D. Technical Documents:
- [ ] System architecture diagram
- [ ] Data flow diagrams
- [ ] Smart contract code (redacted for confidentiality)
- [ ] API documentation
- [ ] Security framework
- [ ] Privacy policy
- [ ] Data protection procedures

E. Compliance Documents:
- [ ] KYC/AML framework
- [ ] Testing scope document
- [ ] Compliance checklist
- [ ] Risk assessment matrix
- [ ] Incident response plan

F. Legal Documents:
- [ ] NDA template
- [ ] Testing agreement
- [ ] Privacy notice
- [ ] Data deletion procedure

12   FINAL STATEMENT FOR LAWYER

Dear Lawyer,
You are receiving this comprehensive brief because we want you to fully understand our project before providing your legal opinion.
What We Are Doing:
NivixPe is a blockchain-based cross-border payment platform. We help people send money internationally faster and cheaper than traditional banks.
What We Need:
Your legal opinion and affidavit confirming:
1. Our company is legal in India
2. Our testing phase is legal
3. Our technology is legal
4. Our business model is legal
5. We follow all applicable regulations
6. We can proceed with testing
What You'll Review:
- Company registrations
- Tax compliance
- CA certifications
- Technical architecture
- Regulatory compliance framework
- Testing specifications
What You'll Provide:

- Legal opinion (written)
- Affidavit (signed)
- Professional certifications
- Regulatory analysis
- Authorization statement

Timeline:
- Receipt of brief: Today
- Review period: 3-5 business days
- Questions & clarifications: As needed
- Final affidavit delivery: [Date]

Your Credentials Will Be Visible On:
- Law firm letterhead
- Bar license number (clearly stated)
- Your signature (original)
- Law firm seal
- Professional indemnity insurance backing

This Will Be Used For:
- Regulatory inquiries: If government asks, we show your affidavit
- Investor presentations: To prove we're legal and compliant
- Business partnerships: To verify we're legitimate
- Legal defense: If anyone questions our legality
- Regulatory approval: For future government registrations

Please review all enclosures and let us know if you need any additional information or clarification.

We look forward to working with you to authorize NivixPe's testing phase launch.

Best regards,

Pasupuleti Sahith Kumar

Founder, NivixPe Private Limited

—

END OF COMPREHENSIVE LAWYER BRIEF