

To,  
The Presiding Officer  
Consumer Disputes Redressal Commission  
Bangalore, Karnataka

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

Respected Sir/Madam,

I, heeh, resident of Bangalore, Karnataka, 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, 2010, which establishes her ownership of the entire land parcel in question, enjoying a presumption of validity under Indian law.
2. Allegations of tampering with the original sale deed have been raised by Meera Devi, asserting that Ramesh Kumar altered the document after it was signed but prior to its registration, which, if proven, would invalidate any subsequent claims he makes regarding the property.
3. In the landmark case *K.K. Verma vs. Union of India* (1954), the Supreme Court affirmed that registered documents serve as primary evidence of ownership, placing the burden on Ramesh Kumar to provide compelling evidence to counter Meera Devi's claims.
4. The Supreme Court's ruling in *Bhaskar Lindre vs. State of Maharashtra* (2017) emphasizes that allegations of forgery or tampering must be substantiated with clear and convincing evidence, directly impacting Ramesh Kumar's ability to defend his position against Meera Devi's ownership claim.

**LEGAL BASIS:**

1. Section 55 of the Transfer of Property Act, 1882: This section mandates that the seller must disclose any material defects in the property. If Meera Devi can establish that Ramesh Kumar failed to disclose tampering or alterations to the sale deed, it would constitute a breach of this duty, reinforcing her claim to ownership.
2. Section 17 of the Registration Act, 1908: This section requires that certain documents, including sale deeds, must be registered to be admissible as evidence in court. Meera Devi's registered sale deed serves as prima facie evidence of her ownership, placing the burden on Ramesh Kumar to provide compelling evidence to counter her claims.

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 registered sale deed is a legal document that affirms her ownership rights, and any tampering by Ramesh Kumar would violate her constitutional right to property.

4. Section 101 of the Evidence Act, 1872: This section states that the burden of proof lies on the party who would fail if no further evidence is presented. In this case, if Meera Devi presents credible evidence of tampering, the burden shifts to Ramesh Kumar to disprove her allegations, thereby strengthening her position in the ownership dispute.

### **PRAYERS:**

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

1. Direct the respondent, Ramesh Kumar, to provide clear and convincing evidence to substantiate his claims regarding the alleged alterations to the registered sale deed within a period of 30 days from the date of this order.
2. Issue an order affirming Meera Devi's ownership rights over the entire land parcel based on the original registered sale deed executed by Ramesh Kumar, thereby invalidating any subsequent claims made by Ramesh Kumar, including the gift to his nephew.
3. Mandate a forensic examination of the registered sale deed to determine any instances of tampering, with the results to be submitted to the court within 45 days from the date of this order.

### **DOCUMENTS ENCLOSED:**

1. Copy of the original registered sale deed executed by Ramesh Kumar in favor of Meera Devi, including any relevant registration details and timestamps.
2. Affidavits or witness statements from individuals who were present during the signing of the sale deed and can attest to the authenticity of the document and any alleged tampering.
3. Forensic analysis report detailing handwriting comparisons and alterations made to the original sale deed, if applicable.
4. Documentation of Meera Devi's continuous possession and use of the land since the original transaction, including utility bills, tax receipts, or photographs.
5. Legal opinion or memorandum from a property law attorney outlining the implications of the relevant case law and constitutional provisions supporting 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: Bangalore, Karnataka

Yours faithfully,

heeh

Contact: 1234567890

Address: Banglaore, Karnataka