COMPLAINT

To:

**Superintendent of Police,**

**Prakasam (Dt),**

**Andhra Pradesh**

**523001**

Subject: **Complaint Against Srihari Kothapalli and Siva Byrapuneni, Snovasys Software Solutions Pvt. Ltd. (Ongloe) - Systemic Exploitation, False FIR and Threats to Life and Liberty.**

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Respected Sir/Madam,

**Complainant Details:**

Mr. Maddineni Srihari, Male, Aged about 22, a resident of # 1-49, Mittapalem, Kondepi Mandal, Prakasam District, Andhra Pradesh – 523273.

Mobile No. +91-63042-14514, Email: srihari.maddineni.no1@gmail.com

**Victim Details:**

* Self.

**Respondents:**

1. Mr. Srihari Kothapalli, CEO, Snovasys Software Solutions India Private Limited, 9-1-24, Sai Narayana Enclave, Bandlametla, Ongole, Andhra Pradesh, 523001
2. Mr. Byrapuneni Siva Anjaneyulu, Manager & Indian CEO, Snovasys Software Solutions India Private Limited, 9-1-24, Sai Narayana Enclave, Bandlametla, Ongole, Andhra Pradesh, 523001
3. Mr. Giri Yendluri, Manager, Snovasys software solutions, India Private Limited, 9-1-24, Sai Narayana Enclave, Bandlametla, Ongole, Andhra Pradesh, 523001
4. Mr. Visweswar Reddy Narala, Risk Officer, Snovasys Software Solutions India Private Limited, 9-1-24, Sai Narayana Enclave, Bandlametla, Ongole, Andhra Pradesh, 523001

**Details of Incident:**

1. I, Maddineni Srihari, the Complainant, was recruited by Respondent company Snovasys Software Solutions India Pvt. Ltd. (hereinafter referred to as 'the Company'), through campus placement at Bapatla Engineering College in September 2023. Upon joining, I was subjected to a pattern of systemic exploitation and fraudulent practices orchestrated by the Company and its representatives. This exploitation included pre-employment coercion, fraudulent role change, illegal salary reduction, and forced resignation. Following my refusal to succumb to their post-resignation extortion attempts, the Company (SIVA BYRAPUNENI) filed a false First Information Reports (FIRs) against me.
2. **Chronology of Exploitation:**
   1. **Fraudulent Recruitment (September - October 2023):**

* **26th September 2023:** During the Human Resources (HR) round of the recruitment process conducted by the Company, I was explicitly informed that the issuance of an offer letter was contingent upon my agreement to provide a signed blank cheque equivalent to 75% of my Cost to Company (CTC – Rs. 6,50,000/-), amounting to ₹4,87,000. This demand was presented as a non-negotiable condition, effectively coercing me under the threat of offer cancellation.
* **30th October 2023:** Prior to receiving the formal offer letter, I was compelled to submit the signed blank cheque to the Company as per their pre-employment demand.
* **31st October 2023:** I was pressured to sign a digital offer letter within a matter of hours of its receipt, without being afforded adequate time for proper review and understanding of its terms and conditions.
  + - 1. **Workplace Exploitation (May - August 2024):**
* **May 20th, 2024:** I formally joined the Company as a Software Trainee Engineer, as per the initial terms of my recruitment.
* No proper training was provided for the job as stated during the interview. Additionally, for training and related costs, the company took an undated blank cheque as compensation.
* During the tenure of my work time, I was continuously harassed and instructed to work beyond working hours or to resign if I cannot.
* **12th August 2024**: Despite my initial recruitment and joining as a Software Trainee Engineer, the Company unilaterally and without my consent reassigned me to the role of a data entry operator. This constituted a significant and detrimental change in my job profile, deviating from the skills and expectations set during the recruitment process.
* **14th August 2024**: When I requested a clear explanation of such change in role, the Company representatives threatened to drastically reduce my salary to a mere ₹10,000 per month. This threat was a clear act of intimidation and an attempt to further exploit my vulnerable position.
* **17th August 2024**: Due to the persistent workplace harassment and the Company's refusal to adhere to the terms of my initial recruitment, I was effectively forced to resign from my position. Immediately upon submitting my resignation, the Company blocked all my access to company resources and communication channels within hours without any communication.
  + - 1. **Post-Resignation Harassment (August 2024 - April 2025):**
* **September 2024**: The Company attempted to illegally encash a blank pre-employment cheque amounting to ₹4,87,000. This action constituted a blatant act of extortion, leveraging a coercive demand made prior to my employment, and was done without our consent to use the cheque.
* An advocate claiming to represent Snovasys Software Company threatened me through calls and text messages, blackmailing me to pay ₹4,87,000 by warning of immediate legal action if I failed to comply.
* **October 2024**. I began raising complaints about these illegal and unethical labour practices with the Hon'ble Chief Minister's Grievance Cell. The complaint was subsequently forwarded to the Commissioner of Labour in Vijayawada, and then to the Assistant Commissioner of Labour in Ongole.
* However the issue was confined to my unpaid salary wages, which is only scope of office of labor department, Ongole, Multiple Joint meetings have been conducted by Officials in labor department, not limited to but including, Assistant commissioner of labour, Deputy commissioner of labor, and also Joint commisoner of labor.
* **November 2024**. I even lodged a formal complaint to the Honourable District Collector regarding the unethical, and unfair labour practices.
* **December 2024**. After multiple joint meetings conducted by the Labour Department in Ongole, the Assistant Commissioner of Labour submitted a report against the company for its rude, disrespectful, and arrogant behavior—even towards the staff of the Labour Department—and for its clear lack of intention to resolve the issue.
* We received an official summons notice from the II Additional Magistrate Court, Ongole, regarding a cheque bounce case under Section 138 of the Negotiable Instruments Act.
* **January 2025**: In order to report the ongoing harassment by Siva Byrapuneni from Snovasys Software Solutions, I approached the 1 Town Police Station to express my concerns. To my surprise, I found out that Siva Byrapuneni had already filed a complaint against me at the station regarding my resignation, even though the matter was still under proceedings with the Office of the Deputy Commissioner of Labour, Ongole.
* **13th January:** We submitted our complaint to SI Tyagaraju sir. When we requested an acknowledgement, he informed us that it would be provided in 2 or 3 days.
* **17th January**: We visited the 1 Town Police Station again. A discussion between Siva Byrapuneni and me was held in the office of the CI, 1 Town Police Station, Ongole. Later, SI Tyagaraju sir advised us to resolve the matter privately with the help of a third party, and neither of our complaints were formally considered by then.
* **18th Jan 2025:** After proper joint meetings were held in the presence of the Hon’ble Deputy Commissioner of Labour, Mr. Visweswar Reddy, the Chief Risk Officer of Snovasys agreed to settle the dispute within 2 to 3 hours and asked me to visit their office on 20th and 21st January 2025, in the presence of the Deputy Commissioner of Labour.
* **21st Jan 2025**: We were made to wait for them on 20th and 21st January 2025. Later, it was revealed that I was once again pressured to sign illegal documents stating that all my complaints were false and fabricated, allegedly intended to damage the company’s reputation—an accusation I firmly denied and refused to sign.
* **February 2025:** I also lodged a formal complaint with the Hon’ble Superintendent of Police, Prakasam District, regarding the prolonged harassment by Snovasys Software Solutions, specifically naming CEO Srihari Kothapalli, Siva Byrapuneni, Giri Yendluri, and Visweswar Reddy.
* The company began filing false cyber-crime complaints in an attempt to further harass me—not only within the jurisdiction of Andhra Pradesh, but also at the Madhapur Police Station in Telangana.
* **March 2025:** When we explained the background details of the ongoing harassment since October in Andhra Pradesh, the Inspector at Madhapur Police Station demanded valid and genuine proof of cyber-crime issue, which Visweswar failed to provide, ultimately leaving the station.
* Furthermore, based on a false and fabricated complaint by the siva byrapuneni, a baseless First Information Report (FIR No. 38/2025) was registered against me at Ongole I Town Police Station, without any intimation.
* **April 2025**: I was summoned by the police in relation to the FIR based on the false complaint, requiring me to seek bail.

1. **Violations of Law:**

The actions of the Respondents constitute severe violations of several laws and fundamental human rights, including but not limited to:

* **Bonded Labour**: The pre-employment coercion to submit a blank cheque as a condition of employment and the subsequent attempts to encash it, along with the imposition of a de facto illegal employment bond through threats and financial coercion, are in direct violation of the Bonded Labour System (Abolition) Act, 1976.
* **Extortion**: The demand for a blank cheque amounting to ₹4,87,000 under the threat of offer cancellation and the subsequent attempt to illegally encash it constitutes the offence of Extortion under BNS.
* **Fraud**: The Company's conduct in recruiting me as a software developer and then unilaterally changing my role to data entry within three months, coupled with the subsequent threats of illegal salary reduction, constitutes Fraud and Cheating under BNS involving a deceptive inducement to enter employment.
* **Wage Theft and Unfair Labour Practices**: The unilateral reduction in salary and the overall exploitative working conditions, including the threat of further illegal salary reduction, are in violation of the principles of fair wages and potentially the Payment of Wages Act.
* **False FIR / Malicious Prosecution:** Filing a deliberately false FIR (No. 38/2025) at 1 town police station to harass the complainant.
* **Criminal Intimidation:** Threatening with legal consequences, coercion to sign false affidavits/documents.

**• Use of Forced Documents:** Forcing to sign false statements and misusing pre-signed cheques.

* **Labour Law Violations (Industrial Employment Standards):** Forced resignation, lack of contract compliance, intimidation tactics post-resignation.

**Relief Details:**

In light of the aforementioned facts and violations of law, I, the Complainant, humbly request the Superintendent of Police to:

1. Order an immediate and impartial investigation into the fraudulent recruitment, illegal employment practices, and bonded labour system employed by Snovasys Software Solutions India Pvt. Ltd.
2. Direct the cancellation of FIR No. 38/2025 and ensure that no further coercive or retaliatory actions are taken against me or my family by the Respondents, in the interest of life, liberty, and justice.
3. Recommend criminal and disciplinary action against all individuals found responsible for extortion, unlawful confinement, wage violations, and abuse of authority.

Hence, I sincerely hope that the Hon’ble Superintendent of Police will take appropriate action at the earliest. I shall remain grateful for your kind consideration and for initiating swift and firm measures in this regard.

Thanking you in anticipation.

Yours obediently,

Place: **Ongole**

Date: **\_\_\_/04/2025** [**Srihari Maddineni**]

**Enclosures:**

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| Annexure 1 | Offer letter |
| Annexure 2 | Resignition letter |
| Annexure 3 | Advocate warning messages and calls |
| Annexure 4 | Complaints, procedures and Reports by Labour department |
| Annexure 5 | Illegal documents I was forced to sign on |
| Annexure 6 | FIR copy |