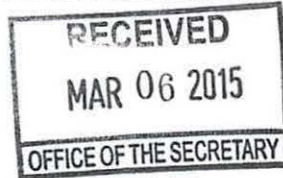


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05th March, 2015

BEFORE THE SECURITIES AND EXCHANGE COMMISSION OF
UNITED STATES OF AMERICA

ADMINISTRATIVE PROCEEDING NO. File No.3-16267

UNDER THE SECURITIES ACT OF 1933

IN THE MATTER OF;

PANKAJ KUMAR SRIVASTAVA AND NATARAJ KAVURI

AND IN THE MATTER OF;

REPLY ON BEHALF OF MR. NATARAJ KAVURI TO THE NOTICE
OF ADMINISTRATIVE PROCEEDING INITIATED PURSUANT TO
SECTION 8A OF THE SECURITIES ACT OF 1933.

1. Notice of the administrative proceeding initiated pursuant to Section 8A of the Securities Act of 1933 addressed to Mr. Nataraj Kavuri was served on Mr. Nataraj Kavuri on 02.02.2015. Mr. Nataraj Kavuri, has instructed me to give the following reply on his behalf.

2. The addressee, Mr. Nataraj Kavuri hereby denies all the allegations of fraud in the notice and respectfully submits that he has not played any roll in the business except

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giving his consultancy service for the purpose of developing the website. Mr. Nataraj Kavuri has neither done any act which can come within the definition of 'Securities transaction' nor did he act as agent, middlemen or insurer for any transaction in securities. The administrative proceedings, initiated against him under the Securities Act of 1933, are therefore without jurisdiction.

3. Mr. Pankaj Srivastava was the ex-colleague of Mr. Nataraj Kavuri and was one of his onsite (USA) co-ordinators whom he used to work with. Mr. Nataraj Kavuri was the best performer and a GOTO guy in their team. Even after returning from USA in late 2006 Mr. Pankaj Srivastava used to keep in touch with Nataraj Kavuri now and then.
4. Sometime in June 2012 Mr. Pankaj Srivastava contacted Nataraj Kavuri and informed him about an e-commerce business plan and requested him to join which offer he politely declined. But Srivastava followed up with him and requested him to at least assist his technical team. On his persistent request, Mr. Nataraj Kavuri agreed to help in as a consultant but told him that he would not be a part of

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any of his business dealings and would maintain an arm's length from the same and shall provide only technical assistance.

5. Mr. Srivastava used to forward the technical requirements and contents to Mr. Nataraj along with his web designing team (Sysfo Solutions) during the development of the website www.unitedpaycheck.com. The website was launched around Sep 2012 after which Mr. Nataraj's contact with Srivastava and the web designing team was very minimal and was confined only to exigencies of technical issues. Later Mr. Nataraj got busy with his personal life as he was expecting his first baby in Dec-2012 who was born on Dec 10 2012. The main point here is that he was not at all involved in any of Srivastava's post launch business activities.

6. By end of Jan 2013, Srivastava came back frantically saying that there were issues in the website and so he wanted a fresh website where in he could make up with the learning and issues from the first one. He pressurised Mr. Nataraj so much so that he had to accept the request, but

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made it a point to him clearly that this would be the last technical assistance that would be provided. He also requested Mr. Nataraj to use a different email id (coolblu49@gmail.com) and name (Nathan Jones) while dealing with the web designing team as he wanted them to assume they were dealing with a new client and in turn take the new project more seriously. This name and email id were used exclusively for the communication purposes during the technical assistance of the website www.profitsparadise.com. Even the video related to Profits Paradise website was created on Srivastava's request only.

7. Around April 2013, when the development of Profits Paradise website was about to be completed and launched, Nataraj Kavuri completely detached himself from all the activities related to Srivastava. Consequently, he was not at all involved in the development of any other website. Nataraj was neither involved in Srivastava's business activities nor had any intention to be part of the same. He had only rendered technical assistance.
8. Mr. Nataraj never had any plan to start the business nor to invite any investment from clients through the website

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www.profitsparadise.com. Since the business of "Profitsparadise" was never started and no investment attracted, it is submitted that Mr. Nataraj Kavuri has not committed any mischief which can come within the purview of Securities Act of 1933. The Administrative Proceeding taken against him may therefore be terminated.

Thanking You

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