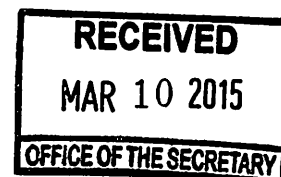


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of

PANKAJ KUMAR SRIVASTAVA

AND

NATARAJ KAVURI,

Respondents.

ADMINISTRATIVE PROCEEDING
File No. 3-16267

**PROOF OF SERVICE ON RESPONDENTS AND NOTICE OF THE DIVISION'S
RECEIPT OF THEIR "REPLIES" TO THE ORDER INSTITUTING PROCEEDINGS**

The Division of Enforcement (Division) files this Proof of Service on Respondents and Notice of the Division's Receipt of their "Replies" to the Order Instituting Proceedings. The Division files this pleading to inform the Court that both Respondents—Pankaj Kumar Srivastava (Srivastava) and Nataraj Kavuri (Kavuri)—have acknowledged receipt of the Order Instituting Proceedings (OIP). Service of process is therefore complete as to both of them.¹ The Division also files this pleading to inform the Court that it received correspondence from the Respondents' counsel that purports to reply to the OIP. Because it is unclear whether the Respondents will file the correspondence with the Office of the Secretary, as required by the SEC Rules of Practice, out of an abundance of caution the Division is providing it to the Court for consideration. The Division takes no position on whether the correspondence should be accepted for filing. Finally,

¹ This proceeding was instituted on November 12, 2014. On December 9, 2014, Judge Foelak ordered the Division to provide a status report on its efforts to serve Respondents, every sixty days, and scheduled a telephonic prehearing conference for June 26, 2015, at 10:30 a.m. EDT. Since the Respondents have been served this will be the Division's final status report on service of process.

the Division wishes to inform the Court that the lawyers representing Srivastava and Kavuri are based in India and the Division is unaware whether they are admitted to practice before the Supreme Court of the United States or the highest court of any State, in accordance with Rule 102(b) of the SEC Rules of Practice. 17 C.F.R. § 201.102(b).

Service of the OIP on Kavuri and Srivastava is Complete

1. As to Kavuri, on February 2, 2015, an agent of the Securities and Exchange Board of India (SEBI) personally served the OIP on Kavuri. The Affirmation of Service on Kavuri is attached hereto as Exhibit 1. Additionally, on March 5, 2015, the Division received correspondence from a New Delhi, India-based attorney, Mukti Chowdhary, counsel to Kavuri (“Chowdhary correspondence” attached hereto as Exhibit 2). The Chowdhary correspondence acknowledged that the OIP was served on Kavuri on February 2, 2015. (Exhibit 2, para. 1.)

2. As to Srivastava, on March 5, 2015, the Division received correspondence from another New Delhi, India-based attorney, Ramesh Babu M.R., counsel to Srivastava. (“Babu correspondence” attached hereto as Exhibit 3). The Babu correspondence states that the OIP was not served on Srivastava, but that the OIP “has come to his notice through Mr. Nataraj Kavuri . . .” (Exhibit 3, para. 1.) Srivastava thus acknowledged that he received actual notice of the OIP. Rule 141(a)(2)(iv) of the SEC Rules of Practice—concerning service of OIPs “*Upon Persons in a Foreign Country*”—permits service “by any other method reasonably calculated to give notice . . .” 17 C.F.R. Section 201.141(a)(2)(iv). Srivastava’s receipt of actual notice of the OIP from his co-respondent fits within the contours of Rule 141(a)(2)(iv).

The Chowdhary Correspondence and the Babu Correspondence Purport to Reply to the OIP

3. On February 20, 2015, Chowdhary emailed the Division that she represents both Srivastava and Kavuri², and that Chowdhary would send the Division their reply to the OIP within 15 days. By reply email, the Division provided a link to the SEC Rules of Practice and explained that the Respondents would have to file any pleading or motion with the Office of the Secretary, and provided Chowdhary with the address of the Office of the Secretary and other contact information, including the fax number of the Office of the Secretary, and the email address for the SEC's Administrative Law Judges. Chowdhary's February 20, 2015 email and the Division's reply email of the same date are attached hereto as Exhibit 4.

4. On March 5, the Respondents' attorneys submitted correspondence to the Division styled, respectively, as "Reply on Behalf of Mr. Pankaj Kumar Srivastava To the Notice of Administrative Proceeding Intiated [sic] Pursuant to Section 8A of the Securities act of 1933," and "Reply on Behalf of Mr. Nataraj Kavuri to the Notice of Administrative Proceeding Intiated [sic] Pursuant to Section 8A of the Securities Act of 1933." See Exhibits 1 and 2 hereto. In cover emails, Babu and Chowdhary both wrote: "It is important to inform you that our attempt to fax the reply was failed in the given number, therefore we are forwarding the copy of our reply along with this mail and the original copy we are sending through post." The Division is unaware whether the Respondents' attorneys will be filing these documents according to the requirements of the SEC Rules of Practice.

It is Unclear Whether the Attorneys are Admitted to Practice in the United States

5. According to the letterhead on their correspondence, the attorneys representing the Respondents are based in New Delhi, India. See Exhibits 1 and 2 hereto. Rule 102(b) of the

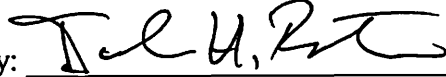
² Notwithstanding this earlier representation, Srivastava is now represented by Ramesh Babu, M.R.

SEC's Rules of Practice (17 C.F.R. Section 201.102(b)) is titled "Appearance and Practice Before the Commission." It provides: "A person shall not be represented before the Commission or a hearing officer except as stated in paragraphs (a) and (b) of this rule or as otherwise permitted by the Commission or a hearing officer." Paragraph (b), *Representing Others*, provides in part that "[i]n any proceeding, a person may be represented by an attorney at law admitted to practice before the Supreme Court of the United States or the highest court of any State . . ." The Division is informing the Court that at this time it does not appear that either of the Respondents' counsels meets the standard set forth in Rule 102(b) because neither of their counsel appear to be "admitted to practice before the Supreme Court of the United States or the highest court of any State."

Dated: March 10, 2015

Respectfully submitted,

DIVISION OF ENFORCEMENT

By: 

Daniel H. Rubenstein

Attorney-Advisor

Division of Enforcement

Securities and Exchange Commission

100 F Street, NE

Washington, DC 20549-5553

Telephone: (202) 551-4721

rubensteind@sec.gov



OFFICE OF
THE SECRETARY

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F Street, N.E.
Washington, D.C. 20549

NOV 12 2014

PERSONAL SERVICE

Mr. Nataraj Kavuri

Hyderabad, India

Re: In the Matter of Pankaj Kumar Srivastava and Nataraj Kavuri

Dear Mr. Kavuri:

Please find enclosed the Order Instituting Administrative and Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933 (the "Order") in the above-referenced matter.

Your attention is directed to Section IV of the Order, which requires you to file an answer pursuant to Rule 220 of the Commission's Rules of Practice. The Commission's Rules of Practice can be found at <http://www.sec.gov/about/rulesofpractice.shtml>. Rules 220 and 310 of the Commission's Rules of Practice provide that if you fail to file the required answer or fail to appear at a hearing after being duly notified, you may be deemed in default and the proceedings may be determined against you upon consideration of the order for proceedings, the allegations of which may be determined as true.

Please file an original and three copies of your answer or other pleadings as required by Rule 152(d) of the Commission's Rules of Practice. Please also file a notice of appearance as required by Rule 102(d) of the Commission's Rules of Practice.

If you have any questions or wish to discuss any aspect of the proceedings, you may communicate with Kenneth Donnelly, Esq., Securities and Exchange Commission, 100 F Street, N.E., Washington, DC 20549-5949 at telephone number (202) 551-4946.

Sincerely,

Brent J. Fields
Secretary

Enclosure

K. Nataraj

By: *Jill M. Peterson*
Jill M. Peterson
Assistant Secretary

Kujj
Received on 02/02/2015
Flat No: 208, Venkatapathy Mansion, 14PHB
Venkatapathy, Hyderabad-72

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING

File No. 3

In the Matter of
RANKAJ KUMAR SRIVASTAVA
and
NATARAJ KAVURI,
Respondents.

AFFIRMATION OF SERVICE

I, K. Divya Teja, certify and affirm that I have personally delivered
Name

a copy of the attached Order Instituting Administrative and Cease-and-Desist Proceedings

Pursuant to Section 8A of the Securities Act of 1933 ("Order") upon Mr. Nataraj Kavuri
Name of person served

whose address is Flat no. 208, Venkatapathy Mansion, KPHB Kukatpally,
Hyderabad - 500072
Jelangana

Dated: 02/02/2015, at SEBI - Hyderabad Local office.
Date Location

Divya

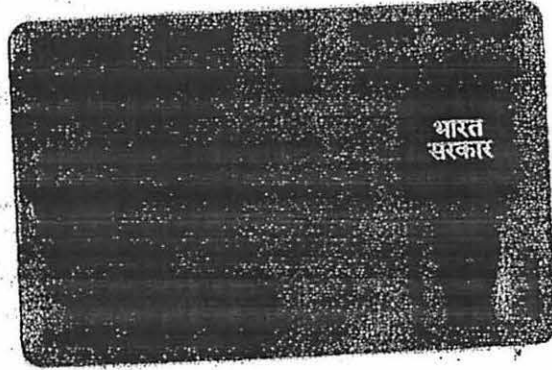
Signature

Securities and Exchange Board of India
1st Floor Indira Chamber
8-2-622/5/A/1 Road No 10, Avenue - 4
Banjara Hills, Hyderabad 500 084

Address and Telephone Number

Ph - 040 - 69994096

040 - 23384475 / 76



Self attested by me
on 02/02/2015

kevj

आयकर विभाग
INCOME TAX DEPARTMENT

भारत सरकार
GOVT. OF INDIA

NATARAJ KAVURI

RAMASESHU KODANDA KAVURI

28/08/1981

Permanent Account Number

Signature

भारत सरकार

08082013

Account
number
redacted
by SEC
Division of
Enforcement →

Self attested by me
on 02/02/2015

Kavuri

Kurr, Carolyn

From: mukti chowdhary <mukti1805c@gmail.com>
Sent: Thursday, March 05, 2015 2:11 AM
To: Kurr, Carolyn
Subject: Administrative Proceeding File No. 3-16267
Attachments: Letter dated for securities n exchange 2nd.docx; Reply to the administrative notice on behalf of Natraj Kavuri 05.03.2015.doc

To,

Mr. Carolyn Kurr

Senior Counsel

Division of Enforcement

Securities and Exchange Commission

100 F, Street, N.E.

Washington D.C.

Sub: Administrative Proceeding File No. 3-16267

Dear Sir,

Kindly refer to letter dated 20.02.2015, requesting for extension of time for submitting the reply. Please find enclosed herewith the reply on behalf of Mr. Natraj Kauri to the notice of administrative proceedings under the Securities Act of 1923.

It is important to inform you that our attempt to fax the reply was failed in the given number, therefore we are forwarding the copy of our reply along with this mail and the original copy we are sending through post.

Thanking You

Mukti Chowdhary

Advocate

407, M.C. Setalvad Block

New Lawyers' Chamber

Supreme Court of India

New Delhi, 110001

Ph: [+91 11 23386255](tel:+911123386255)

Mob: [+91 9717937389](tel:+919717937389)

Mukti Chowdhary
Advocate-on-Record
Supreme Court of India

Chamber: 407, M.C. Setalvad Block
New Lawyers' Chamber
Supreme Court of India,
New Delhi, 110001
Ph: 91-9350118713, 91-9717937389
e-mail: mukti1805c@gmail.com

Date: 5th March, 2015

To,

Mr. Carolyn Kurr
Senior Counsel
Division of Enforcement
Securities and Exchange Commission
100 F, Street, N.E.
Washington D.C.

Sub: Administrative Proceeding File No. 3-16267

Dear Sir,

Kindly refer to letter dated 20.02.2015, requesting for extension of time for submitting the reply. Please find enclosed herewith the reply on behalf of Mr. Natraj Kauri to the notice of administrative proceedings under the Securities Act of 1923.

Thanking You

Mukti Chowdhary
Advocate
407, M.C. Setalvad Block
New Lawyers' Chamber
Supreme Court of India
New Delhi, 110001
Ph: +91 11 23386255
Mob: +91 9717937389

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

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. Natraj 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 Natraj Kavuri now and then.
4. Sometime in June 2012 Mr. Pankaj Srivastava contacted Natraj 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. Natraj Kavuri agreed to help in as a consultant but told him that he would not be a part of 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

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

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 the him may therefore be terminated.

Thanking You

Mukti Chowdhary
Advocate for Natraj Kavuri
407, M.C. Setalvad Block
New Lawyers' Chamber
Supreme Court of India
New Delhi, 110001
Ph: +91 11 23386255
Mob: +91 9717937389

Kurr, Carolyn

From: Ramesh Babu <rbabumr@gmail.com>
Sent: Thursday, March 05, 2015 2:18 AM
To: Kurr, Carolyn
Subject: Administrative Proceeding File No. 3-16267
Attachments: Letter Head-Babu Sir.docx; Letter Head-Babu Sir Covering letter.docx

To,

Mr. Carolyn Kurr

Senior Counsel

Division of Enforcement

Securities and Exchange Commission

100 F, Street, N.E.

Washington D.C.

Sub: Administrative Proceeding File No. 3-16267

Dear Sir,

Kindly refer to letter dated 20.02.2015, requesting for extension of time for submitting the reply. Please find enclosed herewith the reply on behalf of Mr. Pankaj Kumar Srivastava to the notice of administrative proceedings under the Securities Act of 1923.

It is important to inform you that our attempt to fax the reply was failed in the given number, therefore we are forwarding the copy of our reply along with this mail and the original copy we are sending through post.

Thanking You

Best regards,

Ramesh Babu M.R.
Advocate
407, New Lawyers' Chambers
Tilak Marg, Supreme Court of India
New Delhi - 110 201

Ramesh Babu M.R.
Advocate-on-Record
Supreme Court of India

Office.& Chamber: 407, M.C. Setalvad
Block, New Lawyers' Chamber
Supreme Court of India,
New Delhi, 110001
Ph: 91+1123386255,
Mob: 91+9873922734
e-mail: rbabumr@gmail.com

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. PANKAJ KUMAR SRIVASTAVA 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 . Though the notice was not served on Pankaj Kumar Srivastava, since it has come to his notice through

Mr. Nataraj Kavuri, he has instructed me to give the following reply on behalf of Mr. Pankaj Kumar Srivastava.

2. First of all, the addressee, Mr. Pankaj Kumar Srivastava hereby denies all the allegations of fraud in the notice. The facts stated in the notice are not correct and are denied except those which are specifically admitted hereunder. The addressee Mr. Pankaj Kumar Srivastava or Mr. Nataraj Kavuri has neither done any act which can come within the definition of 'Securities transaction' nor they acted as agent, middlemen or insurer for any transaction in securities. The administrative proceedings, initiated against them under the Securities Act of 1933, is therefore without jurisdiction.
3. It is true that a bonafide attempt was made by Mr. Pankaj Kumar Srivastava to start a business of online investment but the allegation that the idea was to play fraud on the people is not correct and is emphatically denied. The online business as planned was later abandoned and not even a penny was collected from any investor. Nobody was induced to invest in the said online business nor any money collected in the account of the answering respondents. It is therefore submitted that there is no violation of any of the provisions of the Securities Act of 1933 much less any act inviting action under Section 8A of the Act.
4. The website www.profitparadise.com was started in or around April 2013 and was functional (back end of the website working) only till June 2013. The promotional

activities were done in the web site for only three months. The website was not functional from June 2013. There was only the front page of website without any functional backend. There was negligible traffic after June 2013. My clients did not pay any attention on the maintenance of the website hence there were no transactions at all. Though they created the website and some social media accounts like Facebook, you-tube and G+, the promotional activity was not active and hence no real user invested any money in the website. Not even one user from USA invested any amount in it.

5. The respondents were software engineers and not Investment Experts, and hence not sure about running the business. Apart from this, since they were not sure about the legitimacy of the business they decided not to pursue it. Though the website was up on the domain (which expired on 2nd feb, 2014) there were no traffic through the website after June 2013.
6. Pankaj Srivastava started his career in the year 2004, with Tata Consultancy Services(Chennai, India). He went to USA (Saint Cloud, MN, USA) in January, 2005. He was working as Software Engineer for 'Tata' as full time employee throughout his stay in Saint Cloud, MN.
7. In mid 2006 he came back to India (Bangalore) and continued working as full time employee till year 2008. In the year 2008 he resigned from Tata and started a garment business till year 2012. He was never a full time affiliate marketer, neither he worked as full time affiliate marketer ever. After his garment business did not do well, he was

looking for starting a new business when some friends gave him the idea of online business.

8. Mr. Pankaj Kumar Srivastava then contacted his former colleague Mr. Nataraj Kavuri who agreed to give him technical consultancy for starting the business. They then hired Sysfo Solutions Private Limited (www.sysfosolutions.com) through their owners Mr. Tanuj Anand and Mr. Sanjeev Kashyap for registering the domain, development of website and hosting it on Internet. They hired 'Sysfo' because they did not have requisite technical knowledge about domain registration, development and hosting. It was the responsibility of Sysfo to register the domain. The domain registration address, telephone number and email ID was arbitrarily chosen by Sysfo. Nataraj Kavuri did not supply these information to Sysfo. Nataraj Kavuri never instructed Sysfo to use USA address, phone number and email ID.
9. Pankaj Srivastava never gave any instruction to Sysfo to ensure alexa detail show the website rank in USA. In fact Sysfo was only engaged for development and deployment of website. Alexa ranking comes out of the Internet traffic coming on a particular website. Sysfo was not given any traffic, social media or promotional work.
10. Since Nataraj Kavuri was only helping Pankaj Srivastava in creating the website without any further involvement in the business, he preferred using a different email ID and alias name. They used these email ID only for internal communication. Those email IDs were never used on the

website or any social media. Three accounts in payment processors were created for testing purpose of the website.

11. Neither in the website nor on any social media account was any USA address used. Their idea was never to target users in USA. Using a USA address while domain booking was a singleton error of omission on the part of Sysfo. Also marketing of the website did not start properly; no referral link were given on any of the social media using which user could join the website.
12. As mentioned above, the website was not at all directed towards USA users. Registering a domain with .com extension is a very common practice by web development companies, and that is what Sysfo did while booking the domain. Writing in American English is very common practice in India, and it was not done exceptionally for this website or its social media accounts like Facebook, twitter, you tube and Google Plus. Using a '\$' sign was done because all payment processors uses that sign. There was no other way than to follow the \$ symbol. It was not at all behind their mind to target the users in USA. As a matter of fact no real user from any part of world ever invested a single penny into the website, of course there was no user from USA.
13. As explained above, after June 2013 the website was functionally dead. They were not paying any attention on the maintenance or functioning of the website. There were no instructions given to the web designer Sysfo for maintenance of the website, neither any payment made for

maintenance. As a result the website automatically was removed after expiry of domain. They did not give any instruction to Sysfo to renew the domain. The website www.profitsparadise.com is no more in operation and the respondents have stopped the business once and for ever. They have neither have any plan to start the business nor to invite any investment from clients through the website www.profitsparadise.com. Since the business of "Profitsparadise" was never started and no investment attracted, it is submitted that the respondents have not committed any mischief which can come within the purview of Securities Act of 1933. The Administrative Proceeding taken against the respondents may therefore be terminated.

Regards

Ramesh Babu. M.R
Counsel for Pankaj Kumar Srivastava
407, M.C. Setalvad Block
New Lawyers' Chamber
Supreme Court of India
New Delhi, 110001
Ph: +91 11 23386255
Mob: +91 9717937389

Rubenstein, Daniel

From: Kurr, Carolyn
Sent: Friday, February 20, 2015 1:52 PM
To: 'mukti chowdhary'
Cc: Donnelly, Kenneth; Rubenstein, Daniel
Subject: RE: Administrative Proceeding File No. 3-16267

Dear Mr. Chowdhary,

Thank you for your email stating that you represent Mr. Srivastava and Mr. Kavuri in connection with *In the Matter of Pankaj Kumar Srivastava and Nataraj Kavuri*, Administrative Proceeding File No. 3-16267. I refer you to the Commission's Rules of Practice, which can be found at <http://www.sec.gov/about/rulesofpractice.shtml>. The Rules of Practice explain the circumstances for filing a notice of appearance concerning your representation of Mr. Srivastava and Mr. Kavuri. Also, if you would like an extension to file an answer on behalf of either or both individuals, you must file a motion requesting an extension with the Court. We cannot file the motion for you, but we will not oppose the motion.

You may fax a copy of any pleading or motion to the Office of the Secretary at fax number 703-813-9793, but you must follow up by sending the original document and three paper copies of the document to the Office of the Secretary, Mail Stop 1090, 100 F Street, N.E., Washington, DC 20549. The date that the document is faxed will be the date used to determine whether the document is timely. You may also e-mail a "courtesy" copy of the document to alj@sec.gov, but this is not an effective means of filing and the document will not be considered "filed" until it is received via fax (and later received via mail per the above instructions), or simply received via mail, by the Office of the Secretary.

We understand that Mr. Kavuri was served with the Order Instituting Proceedings on February 2, 2015. Please let us know the date that Mr. Srivastava was served with the Order Instituting Proceedings, or let us know if you are willing to accept service on his behalf.

Please feel free to contact me with any questions or concerns.

Best,

Carolyn Kurr

Carolyn Kurr
Senior Counsel
Division of Enforcement
Securities and Exchange Commission
100 F. Street, N.E.
Washington, D.C. 20549-5553
202-551-4585 (telephone)
202-772-9236 (facsimile)
kurr@sec.gov

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From: mukti chowdhary [<mailto:mukti1805c@gmail.com>]
Sent: Friday, February 20, 2015 9:11 AM
To: Kurr, Carolyn
Subject: Administrative Proceeding File No. 3-16267

To,

Mr. Carolyn Kurr

Senior Counsel

Division of Enforcement

Securities and Exchanged Commission

100 F, Street, N.E.

Washington D.C.

Sub: Administrative Proceeding File No. 3-16267

Dear Sir,

I Mukti Chowdhary, Advocate, is the lawyer for Mr. Pankaj Kumar Srivastav and Mr. Nataraj Kavuri, to whom you have send a notice under Securities Act of 1933. Mr. Nataraj Kauri has placed the notice before us today. We are persuing the notice and preparing the reply of the same. The reply will be send to you within 15 days from today.

Kindly grant us time for filling reply in the above mentioned case.

Thanking You

Mukti Chowdhary

Advocate

407, M.C. Setalvad Block

New Lawyers' Chamber

Supreme Court of India

New Delhi, 110001

Ph: +91 11 23386255

Mob: +91 9717937389