

BEFORE THE ADJUDICATING OFFICER

Secretary, Electronics, Information Technology
and Artificial Intelligence Department,
Mantralaya, Mumbai – 400 032.

Under The Information Technology Act, 2000

In

Complaint Case Number 01 of 2026

E-mail:- itcases@maharashtra.gov.in

.....
No. ITCASE-2026/C.R.01/Tech-1

Reserved on: 18.06.2026

Pronounced on: (Date of Digital Signature)

IN THE MATTER OF,

M/s. Waterways Leisure Tourism Limited

(Formerly known as Waterways Leisure Tourism Private Limited),
Trading under the brand name 'Cordelia Cruises',
Through its Authorized Signatory, Mr. Pratik Shandilya,
16th Floor, A-Wing, Marathon Futurex, N.M. Joshi Road,
Lower Parel, Mumbai – 400 013.

)...Complainant

VERSUS

1. Mr. Sanaulla Saifula Sheikh (Alias 'Sammi' / 'Shami'),
Room No. GNX/366, Near Kalpana Stores, Vijay Nagar,
Rahiwasi Sangh, Dharavi, Mumbai – 400 017.

)...Respondent 1

2. Mr. Ram Kapoor (Alias 'Raman Kapoor'),
Proprietor of M/s. Princess Cruise and Hotels,
28, Part 36, Ahmedabad City, Ahmedabad,
Gujarat – 380 054.

)...Respondent 2

3. Ms. Roshani Bagga,
House No. 926, Pequem, Pednem, Anjuna,
Mapusa, Bardez, North Goa, Goa – 403 509.

)...Respondent 3

Appearances:

Adv. Prashant Mali, for the Complainant was present.

No one represented respondents (Ex-Parte).

[This document presents the proceedings of a complaint filed by the Complainant for adjudication under Section 46 of The Information Technology Act, 2000 (as amended in 2008) (referred to as the "Act"). The hearings were

conducted in accordance with the principles of natural justice and reasonable opportunity, ensuring that both parties, namely the Complainant and the Respondents, were given equal and sufficient opportunities to present and defend their respective cases. After the conclusion of the hearings and the receipt of responses from all involved parties, a decision has been reached, and this judgment is now being delivered.]

1. Brief Facts of the Case and Submissions on Behalf of the Complainant:

1. The Complainant Company, M/s. Waterways Leisure Tourism Limited (formerly known as Waterways Leisure Tourism Private Limited), a premier cruise liner operator trading under the brand name Cordelia Cruises and headquartered at Marathon Futurex, Lower Parel, Mumbai, has initiated these adjudication proceedings through its Authorized Signatory, Mr. Pratik Shandilya. The Complainant is represented by Advocate (Dr.) Prashant Mali.
2. The Respondent No. 1, Mr. Sanaulla Saifula Sheikh (alias 'Sammi'), was employed through a third-party vendor (M/s. Liberium Global Resources Private Limited) and deployed at the Complainant's Worli call center. It is submitted that Respondent No. 1 systematically breached his access privileges, exfiltrating digital user records, prospective customer identities, and corporate leads from the Complainant's internal networks.
3. In premeditated collusion with Respondent No. 2, Mr. Ram Kapoor (Proprietor of M/s. Princess Cruise and Hotels), and Respondent No. 3, Ms. Roshani Bagga, Respondent No. 1 diverted these stolen customer leads to unlisted, competing entities managed by the co-respondents. Learned Counsel for the Complainant, Mr. Mali, submitted that by virtue of his deployment, Respondent No. 1 was entrusted with access to highly sensitive corporate repositories and internal email infrastructure (sanaulla.s@cordeliacruises.com).
4. The Respondents explicitly misrepresented themselves to internal leads as authorized agents and induced innocent customers to process advance ticket payments (often static segments of ₹49,000/- or entire booking buckets scaling to blocks of ₹6,00,000/-) directly into the independent corporate bank channels of Respondents No. 2 and 3, leading to system-wide auto-cancellations, direct revenue diversion, and

profound brand degradation.

5. It is submitted that during an independent forensic audit compiled by M/s. Grant Thornton Bharat LLP (dated June 2024), a technical examination of the digital infrastructure revealed critical vulnerabilities and rogue exfiltration vectors. The Electronic Scheduled Information (ESI) takeout demonstrates that Respondent No. 1 explicitly certified to prospective customers that Princess Cruise and Hotels was an authorized partner, directly diverting data bundles while marking official corporate links in CC.
6. An exfiltrated internal spreadsheet titled "**Ram Sir data**" enlisting private coordinates of 33 individuals was directly recovered from the custodian device of Respondent No. 1. Mr. Mali pointed out that data analytics tools confirmed an organized mismatch between the main passenger Booking Dump and the Reverse Manifest obtained from the vessel engine portal (Resco). This contains 263 verified instances of age-category manipulations (Adults falsely logged as Children/Infants to cause an intentional revenue deficit of ₹38.88 Lakhs) and 50 instances of fraudulent application of inactive pricing models (Companion Offers/Free Upgrades) generating a quantified leak of ₹26.08 Lakhs. Furthermore, user extractions from a corporate laptop revealed deep programmatic threats, specifically screenshots of high-value payment summaries (aggregating to ₹1.68 Lakhs) mapped to entirely fictitious Booking IDs (C-2303020537 and C-2303020888) completely absent from the Complainant's central transaction engine.
7. As a direct consequence of these continuing criminal patterns, **FIR No. 350/2024** was registered at Worli Police Station and **FIR No. 193/2024** was registered at Bangalore City, confirming systemic, trans-state operational clones where the Respondents continuously switch frontend banners (Sun Star Club, Princess Cruises, Celebrity Cruises, Royal Goa Club, and the Bibamus corporate UPI account 9039796994@pthdfc) to process extracted targets. Since a formal Legal Notice met with total defiance, the Complainant has approached this Adjudicating Court under Section 43(b) of the Information Technology Act, 2000, seeking maximum statutory compensation, damages, and strict injunctive reliefs.

2. Submissions on Behalf of the Respondent:

8. Nobody was representing for the Respondents when the matter was called out for hearing.
9. Concurrently, no formal written reply or status report to the main complaint has been filed by the Respondents as of today, and they have failed to submit any defense regarding the definitive independent forensic audit compiled by M/s. Grant Thornton Bharat LLP.

3. Findings and Considerations of the Court:

10. Upon a careful perusal of the record, including the annexures consisting of the forensic imaging reports, email communication trails, and the Grant Thornton data analysis, and having heard the detailed arguments preferred by the Learned Counsel for the Complainant, this Court observes that the Complainant has successfully established a *prima facie* case. The forensic records categorically show unauthorized data copying, download, and extraction within the strict definition of Section 43(b) of the IT Act, 2000, tilting the balance of convenience heavily in favor of the Complainant to prevent irreparable injury to its brand and consumer data safety pipelines.

Interim Order

11. Consequently, to preserve the substratum of the dispute and protect the competing proprietary interests of the entities involved, it is absolutely imperative to maintain the status quo regarding the digital assets of complainant in question till final disposal.
12. Therefore, this Authority hereby passes an EX-PARTE AD-INTERIM INJUNCTION ORDER directing that the Respondents No. 1, 2, and 3, along with their operational affiliates, agents, associates, and proxies, are strictly restrained and prohibited from accessing, printing, copying, formatting, distributing, utilizing, disseminating, or exploiting the Complainant's proprietary customer databases, lead lists, electronic charts, or operational records stolen or exfiltrated from the systems of the Complainant.
13. The Respondents are further strictly prohibited from utilizing the registered trademarks, copyrighted logos, vessel imagery (M.V. Empress), or brand designations of Cordelia Cruises under any frontend configuration (Royal Goa Club, Bibamus, or otherwise) to pretend affiliation or dupe the public.
14. Furthermore, to secure the operational environment against internal technical leaks and programmatic threats during the pendency of this suit, the Complainant is directed to deploy strict systemic process improvements, including mandatory KYC verification for client profiles, automated cryptographic controls blocking manual discount overrides, full API integration between the Admin Portal and the Resco vessel engine, and a strict zero-device call center policy on production floors.
15. The concerned Police Stations (Worli PS, **FIR No. 350/2024** and Bangalore City, **FIR No. 193/2024**) are hereby directed to remain present through an authorized officer on the next date of hearing and shall place on record the status of the investigation and/or the comprehensive investigation report, as may be available, for the consideration of the Adjudicating Officer.

The order is passed on the date of digital signature, at Mantralaya, Mumbai.

(Virendra Singh)

Secretary, Electronics, Information Technology
& Artificial Intelligence Department,
Mantralaya, Mumbai – 400 032.