INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS

Open Access, Refereed Journal Multi Disciplinary Peer Reviewed

www.ijlra.com

ISSN: 2582-6433

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ISSN: 2582-6433

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ISSN: 2582-6433

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ISSN: 2582-6433

THE ₹49 CRORE CHAIWALA: MICRO-ENTREPRENEURS, LEGAL MISRECOGNITION, AND REGULATORY LAPSES IN INDIA'S INFORMAL ECONOMY

AUTHORED BY - VANSHIKA BANSAL

"The poor are not a problem. They are a solution. The problem is the ignorance of the powerful about the capacities of the poor."
— Dr. Muhammad Yunus, Nobel Laureate and Founder of Grameen Bank

Introduction

In 2024, Khemraj Dave, a roadside tea vendor from Patan, Gujarat, gained notoriety after receiving a ₹49 crore income tax penalty notice[1] for purportedly engaging in fraudulent commodities transactions. Mr. Dave did not execute any of the deals. Two local brokers utilised Aadhaar and PAN, which he provided as his identification data, to establish accounts and execute deals in his name. Mr. Dave first disregarded the notices due to his inability to comprehend them. He discovered his connection to around ₹34 crore in fraudulent transactions for the fiscal year 2015–16 only after consulting a lawyer[2]. Subsequently, he lodged a complaint with the police. The Patan police lodged a FIR against brokers Alpesh and Vipul Patel for breach of trust, fraud, forgery, conspiracy, and associated offences. Individuals perceive Mr. Dave as a victim due to his unintentional commission of a crime; nonetheless, his narrative illustrates the profound inadequacies of the system.

Legal Background

OVERVIEW OF LEGAL CHALLENGES FOR INFORMAL MICRO-ENTREPRENEURS

A significant number of India's informal micro-entrepreneurs operate beyond the conventional legal and regulatory framework. The Street Vendors (Protection of Livelihood and Regulation

[1] TNN, 'Gujarat Chaiwala Served Rs 49 Crore I-T Notice!' (*The Times of India*19 May 2024) < https://timesofindia.indiatimes.com/city/ahmedabad/tea-seller-served-49cr-i-t-notice-for-fraudulent-transactions/articleshow/110258064.cms >.

[2] Kalyani B Nair, 'Penalty of Rs 49 Crores for Unscrupulous Transactions: Income Tax Dept Issues Notice to Tea Seller' (*Taxscan.in*23 May 2024) < https://www.taxscan.in/penalty-of-rs-49-crores-for-unscrupulous-transactions-income-tax-dept-issues-notice-to-tea-seller/402271#:~:text=for%20unscrupulous%20transactions.-,Khemraj%20Dave%2C%20the%20tea%20seller%20said%20that%20%E2%80%9CI%20received%20the,financial%20year%202015%2D2016%E2%80%9D. >.

ISSN: 2582-6433

of Street Vending) Act, 2014 represented a significant advancement following years of legal and policy scrutiny. The legislation was explicitly intended to "safeguard the rights of urban street vendors and to regulate street vending operations." A "street vendor" is defined as “a person engaged in vending of articles, goods, wares, food items or merchandise of everyday use or offering services to the general public, in a street, lane, sidewalk, footpath, pavement, public park or any other public place or private area, from a temporary built up structure or by moving from place to place and includes hawker, peddler, squatter and all other synonymous terms which may be local or region specific; and the words “street vending” with their grammatical variations and cognate expressions, shall be construed accordingly.”[3] The Act mandates that local governments conduct vendor surveys, establish Town Vending Committees (TVCs)[4], and issue certificates to vendors permitting them to operate in designated locations under certain criteria. A licensed street seller receives official acknowledgement and a degree of job security: legally, a vendor possessing a valid certificate "shall have the right to engage in the business of street vending" provided they adhere to the regulations stipulated in the certificate. The Act mandates that towns safeguard vendors' employment, such as by prioritising them in market reconstruction, and prohibits the eviction of vendors without legal compliance.

IMPLEMENTATION GAPS AND GROUND REALITIES

In practice, the safeguards provided by the Street Vendors Act have not consistently been equitable. Numerous merchants remain unregistered or are unaware of the Act[5]. Even registered sellers frequently encounter harassment. Research and press articles indicate that street sellers continue to be forcibly removed from their stalls under outdated municipal regulations or are coerced into paying bribes for permission to remain.[6] Research indicates that "street vending is frequently governed by erratic removals" and police interventions, implying that sellers are seen as criminals under antiquated municipal legislation from the colonial period. India's national legislation was lauded as the "first of its kind" for safeguarding sellers' rights; yet, the practical realities frequently diverge from the statutory provisions.[7] The Act solely addresses the authorisation to sell, excluding issues such as financial inclusion or identity

[3] Section 2(l) of The Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act, 2014.
[4] Chapter VII of The Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act, 2014.
[5] ‘Street Vendors and the Law’ (*WIEGO*18 July 2024) < https://www.wiego.org/informal-economy/articles/street-vendors-and-law/ >.
[6] *Ibid.*
[7] *Ibid.*

ISSN: 2582-6433

theft. For instance, Mr. Dave was retailing tea in a public marketplace. Even with a vendor certificate, he would be vulnerable to the misuse of his legal identity by others, as the TVC program does not verify how a vendor administers their bank accounts or documentation.

THE MSMED ACT AND ITS LIMITATIONS

The Micro, Small and Medium Enterprises Development Act, 2006 (MSMED Act) establishes a legislative framework to promote small enterprises. It categorises enterprises according to their expenditures on plant and equipment, and since 2020, their sales figures[8]. As per the updated regulations for 2020, a "micro enterprise" is defined as one possessing equipment and machinery valued at up to ₹1 crore and generating sales of up to ₹5 crore.[9] The Act and associated initiatives, such as Udyam registration, are designed to facilitate access to loans, grants, and market assistance for registered micro-enterprises. If Mr. Dave had formally registered as a micro-enterprise, he would have been eligible for government loan guarantees, training, and subsidies for vendor enterprises. However, he did not, similar to the majority of informal vendors. The majority of micro enterprises in India are not officially registered. A World Bank analysis[10] indicated that over 38.7 million MSME enterprises were unregistered in 2016–17. Among them, 99.8% were micro companies. These unregistered small company proprietors, such as Mr. Dave, predominantly function outside legal parameters. The MSME legislation does not inherently safeguard them or ensure their awareness of their rights. Businesses classified as micro may be unaware of their rights under the Act, including the stipulation that purchasers must remit payment within 45 days. Although the MSMED Act provides a legal framework for small enterprises, it presupposes that the majority of vendors are registered and aware of its provisions, which is not the case.

BROADER EXCLUSION FROM LABOUR AND COMMERCIAL LAW

Generally, India's labour and commercial legislation does not readily acknowledge informal employment. Legal scholars assert that individuals in the informal sector have always lacked a

[8] Bhavya Jain, 'Micro, Small and Medium Enterprises Development Act, 2006' (*LexComply Blog*20 June 2024) < https://lexcomply.com/blog/micro-small-and-medium-enterprises-development-act-2006/#:~:text=the%20revised%20definition%20of%20MSME,is%20notified%20as%20under >.
[9] *Ibid.*
[10] World Bank, *Micro, Small and Medium Enterprises (MSME) Finance in India* (Report No 87, April 2018) https://documents1.worldbank.org/curated/en/863101492074536951/pdf/114202-REVISED-PUBLIC-Report-no-87-MSME-Report.pdf.

ISSN: 2582-6433

definitive legal standing.[11] This is due to the fact that labour laws narrowly define "employee" and "worker," with most regulations (tax, labour, etc.) applicable just to formal enterprises. Consequently, street sellers and home-based artists lack access to labour rights, social security, company permits, and fundamental property rights. The Unorganised Workers' Social Security Act of 2008 establishes provisions for health and maternity insurance for unorganised workers; nonetheless, self-employed vendors remain mostly excluded in practice. The Aadhaar Act 2016 incorporates little privacy safeguards, despite its intention to facilitate the identification of individuals for service provision. It renders the sharing of biometric data unlawful; yet, it fails to provide victims of identity theft with a means to recover their financial losses. In summary, India's legislation ostensibly encompasses street sellers and small enterprises; yet, enforcement and recognition in practice are often lacking.

Analysis

FACTS AND PROCEDURAL HISTORY

In 2014, Mr. Khemraj Dave, a modest tea vendor from Patan, Gujarat, sought assistance with his Know-Your-Customer (KYC) documentation. He provided his Aadhaar card, PAN card, photographs, and even signed blank documents to two local brokers, Alpesh and Vipul Patel. He believed they would assist him in linking his Aadhaar to his existing bank account or obtaining a legitimate PAN.[12] The Patels utilised these papers to establish multiple accounts and conduct high-value commodities transactions in his name without his consent. In August 2023, over a decade later, Dave received three letters from the Income Tax Department demanding payment of ₹49 crore for transactions he did not do.[13] Initially, Dave refrained from taking action due to his lack of proficiency in English and his unfamiliarity with the legal stipulations. He discovered the identity theft alone after consulting with a lawyer. Subsequent investigations revealed that the Patels, rather than Dave, were responsible for the transactions. A First Information Report (FIR) was filed against them under Sections 467, 468, 471, and 120B of the Indian Penal Code. Dave was ultimately exonerated due to the absence of mens rea (criminal intent); but, the incident underscores the perilous situation for informal labourers when legal knowledge is insufficient, KYC regulations are weak, and access to assistance is limited.

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[11] Caroline Skinner, *Eliminating Legal Barriers to the Recognition and Protection of Informal Workers* (WIEGO, August 2019) https://www.wiego.org/wp-content/uploads/2019/09/WIEGO-eliminating-legal-barriers-informal-economy.pdf.
[12] *Ibid.* (n 1)
[13] *Ibid.* (n 1)

REGULATORY FAILURES: KYC, AADHAAR AND DATA PROTECTION

REGULATORY FRAMEWORK FOR KYC AND AADHAAR

Mr. Dave's narrative centred on the issues surrounding India's KYC and identification processes. The RBI KYC Master Directions (2016, with subsequent amendments)[14] permit banks to utilise Aadhaar e-KYC or video verification for onboarding new clients, but with stringent security protocols. The RBI has often advised customers against sharing personal information or KYC papers with unfamiliar individuals or over unprotected means.[15] Official cautions indicate that KYC agents are prohibited from collecting Aadhaar numbers, OTPs, or signed papers unless authorised by the bank. The RBI cautioned of several "KYC-update frauds" in 2024, for instance. Individuals receiving a dubious KYC request were advised to promptly contact their bank via official channels and report the matter to cybercrime authorities. The RBI advised individuals against disclosing OTPs, PINs, or copies of identification documents in response to phone calls or emails.

BREACH OF KYC AND REGULATORY FAILURE

The Patan brokers violated these regulations in reality. They acquired Dave's Aadhaar and PAN, then used his Aadhaar OTP (or e-KYC service) to establish and operate new accounts in his name. As per RBI regulations, individuals who establish an account with Aadhaar or OTP are required to complete in-person verification within one year. This verification was evidently not conducted here. The brokers may have submitted fraudulent KYC paperwork and evaded the requisite in-person verification. The ability of a third party to effectively execute "e-KYC" in Dave's name indicates that the bank failed to do due diligence, highlighting the ease of committing Aadhaar fraud when misapplied.

LEGAL AND TECHNOLOGICAL GAPS IN DATA PROTECTION

Certain issues pertain to legal and technological matters. The Aadhaar Act, 2016 penalises anyone who utilise Aadhaar without authorisation, primarily targeting those who disseminate or retain biometric data without consent. Deliberately providing one's identification information to another individual does not constitute "impersonation fraud." Currently, India lacks a comprehensive law for data protection. Individuals must depend on Section 43A of the

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[14] 'Reserve Bank of India' (*Rbi.org.in*2025) < https://www.rbi.org.in/CommonPerson/english/scripts/notification.aspx?id=2607 >.

[15] Neelanjit Das, 'KYC-Update Frauds Get RBI Attention: Know How Scams Happen, How to Protect Yourself' (*The Economic Times*2 February 2024) < https://economictimes.indiatimes.com/wealth/save/kyc-update-frauds-get-rbi-attention-know-how-scams-happen-how-to-protect-yourself/articleshow/107365513.cms?from=mdr >.

ISSN: 2582-6433

IT Act until a privacy statute is enacted. This provision holds corporations legally accountable for inadequately safeguarding "sensitive personal data." Mr. Dave's Aadhaar and PAN constitute sensitive information; yet, it is challenging to assign legal accountability to any party (bank, broker, or UIDAI).

STRUCTURAL VULNERABILITIES IN BIOMETRIC SYSTEMS

Experts caution that India's biometric identification system had inherent issues. Research indicates that Aadhaar data has been compromised many times, endangering the impoverished to digital criminality.[16] The Carnegie Endowment asserts that a national ID database lacking robust legal safeguards can contribute minimally to economic inclusion and may facilitate fraudulent activities among low-income users.[17] Global courts have consistently affirmed that in 2021, the Kenyan High Court annulled the nation's digital ID initiative due to insufficient privacy safeguards. UIDAI implemented "tokenisation" to safeguard data, allowing banks to view just a surrogate number rather than the genuine Aadhaar.[18] These measures may be effective, if they are executed correctly. In Dave's situation, it appears that the brokers obtained his authentic Aadhaar UID and OTP. This indicates that either the connecting was conducted unlawfully off-token or the bank's tokenisation protocols were not adhered properly.

CRIMINAL LAW IMPLICATIONS

This case pertains to criminal law. As previously stated, IPC offences such as cheating (s.420) and breach of trust (s.406) need mens rea, or dishonest intent, at the time of the offence. Mr. Dave lacked intent; hence he cannot be prosecuted for fraud. The FIR only identifies the brokers. Conversely, the Income-Tax penalty was imposed according to administrative regulations (such as the acceptance of returns), which do not consider intent. Tax notifications do not presume guilt; rather, they infer that the transactions are inherently fraudulent. The authorities appear to have only rescinded or modified the tax demand subsequent to Dave's demonstration of the plot, since the Times story indicates that Patel requested the department to waive the penalty following his complaint. This illustrates a distinction between criminal and tax law: the tax system can pursue an individual until they establish their innocence, but criminal law would not condemn an innocent person.

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[16] 'The Limits of Accelerating Digital-Only Financial Inclusion' (*Carnegie Endowment for International Peace*2023) < https://carnegieendowment.org/research/2023/07/the-limits-of-accelerating-digital-only-financial-inclusion?lang=en >.
[17] *Ibid.*
[18] *Ibid.*

ISSN: 2582-6433

Currently, India lacks a distinct statute addressing "identity theft"; nonetheless, Section 66C of the Information Technology Act renders it unlawful to utilise another individual's electronic signature in an unauthorised manner, which may occur if the OTP is misappropriated. Similarly, Section 63 of the Aadhaar Act penalises anyone who disseminate Aadhaar data without authorisation, albeit in this instance, Dave intentionally provided it. In reality, treatments do not occur simultaneously. Dave's sanction was administered by criminal law (FIR) and should ultimately be addressed through tax rectification. He may initiate legal action against the brokers for damages in civil court; but an impoverished tea vendor lacks the financial means to pursue such a course. This occurrence unequivocally illustrates that the judicial system lacks an expedient mechanism to assist victims of identity theft involving informal workers. The victim must navigate police and tax processes, which is particularly challenging for an uneducated chaiwala.

Comparative Review

Recommendations

Country	**Law/Initiative**	**Key Features**
Peru	Law No. 29419 (2009) – Waste Pickers' Act	Legal recognition, formal registration, social security, technical training, municipal integration
Brazil	Lei No. 6586/1979	Recognized street vendors (ambulantes) as insured workers, reduced-rate social security contributions
ILO (Global)	Recommendation No. 204 (2015)	Encourages legal recognition, social protection, and stakeholder-led formalization
Philippines	Taguig Ordinance No. 45 (2007)	Vendor registration, capped fees, designated vending zones
South Africa	Cape Town municipal by-laws	Licensing, service provision, legal identity for street traders
Ghana	Judicial intervention	Courts recognized street hawking bans as

ISSN: 2582-6433

		unconstitutional (right to work)
Bangladesh	Grameen Bank	Mobile microfinance for informal workers
India	Street Vendors Act	Legal recognition, but limited support services
Nigeria	Central Bank's Tiered KYC (2022)	Minimal ID requirements for small savers
Kenya	M-PESA Mobile Money	Financial inclusion via mobile platform with ID verification

A comprehensive and coordinated policy strategy is essential to safeguard micro-entrepreneurs, such as street vendors, from legal, financial, and systemic vulnerabilities. KYC regulations must be more stringent, particularly for little accounts. This entails verifying your identification either in person or by video following Aadhaar registration, stringent compliance with re-KYC deadlines, and prompt examination of dubious transactions in low-income accounts. Simultaneously, banks, financial institutions, and regulators must implement robust public awareness efforts, particularly in regional languages, to caution individuals against signing blank papers, disclosing OTPs, or responding to fraudulent KYC update requests. Secondly, India must enact legislation that safeguards data and mitigates identity theft independently. Such legislation should render the unauthorised use of identifying papers unlawful, establish mechanisms for victims to get justice, and empower individuals with more control over their data by granting them the rights to amend and remove information. The UIDAI must enhance safeguards by ensuring Aadhaar tokenisation is accessible to everybody and by closely monitoring e-KYC agents and OTP limits.

Third, informal labourers require enhanced access to legal assistance. Municipalities and legal services agencies ought to establish legal outreach clinics in urban marketplaces and cities. These clinics must to be manned by proficient paralegals familiar with the local languages and legal statutes. According to the Street sellers (Protection of Livelihood and Regulation of Street Vending) Act, 2014, these clinics are required to educate sellers of their entitlements, including the right to formal credit, a licence, and legal counsel. NALSA's initiatives to enhance legal literacy have to concentrate on market unions and self-help groups (SHGs). Simultaneously, governmental agencies, including the Income Tax Department, must ensure that information is

ISSN: 2582-6433

comprehensible, accessible in many languages, and inclusive for all, particularly about enforcement measures. Fourth, the government must implement inclusive social policies to assist at-risk informal labourers. Prioritising automatic enrolment in subsidised health insurance, life and accident coverage plans (such as PMJJBY and PMSBY), together with access to pension schemes, is essential. To enhance their collective negotiation capacity and financial stability, informal workers, especially males and service providers, ought to be integrated into Self-Help Group networks. National initiatives focused on skills and urban livelihoods must explicitly incorporate those employed in the informal sector, providing them with education on business acumen, digital competencies, and their legal entitlements.

Conclusion

The "₹49 Crore Chaiwala" story highlights the paradox of India's digital era, where Aadhaar and online banking were meant to help the impoverished, but ultimately led to their victimisation. Informal workers need more than just legal recognition; they require substantial safeguards. To address this, regulators, judges, and policymakers must recognize micro-entrepreneurs as individuals and provide immediate protection. Strengthening KYC enforcement, identity protection laws, and grassroots legal assistance can help build confidence in the system.

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ISSN: 2582-6433

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