

L/ENF/JB-264/IR/2024-2025/353

June 05,2024

**Harendra D. Mehta Share & Stockbrokers Pvt.Ltd.**

**Stockbroker (Clg. No. 264)**

Pg-12, Rotunda Building, Ground Floor

Bombay Samachar Marg

Fort

Mumbai-400023

Dear Sir/Madam,

**Sub: Inspection of Books of accounts and other documents for Cash Segment for the period April 2021– March 2022**

1. After scrutiny of your books of accounts and other documents for Cash segment during Inspection for the Financial Year 2021-2022 covering period April 2020 to March 2021 and findings of inspection was forwarded to you vide letter ref. no. L/DOBS/SS-264/IR/2022-2023/722 dated March 13, 2023 for your comments and you have provided reply/clarification vide your letter dated June 30, 2023 July 21, 2023 & July 26, 2023.
2. After taking into consideration of your submissions, final action letter was issued to you vide letter ref. no. L/DOBS/JB-264/IR/2023-2024/1244 dated August 22, 2023, imposing penalty of Rs.25,000/- for Non reconciliation of balances between Holding Statement and register of securities as per approved penalty norms issued vide Exchange Notice No. 20180214 - 31 dated February 14, 2018.
3. You have requested for waiver of penalty vide email dated August 23, 2023. The matter was placed before the Appropriate Authority in its meeting held on May 22, 2024. Based on the additional submission provided by you, the Appropriate Authority recommended to accede to your request for review of penalty imposed.
4. Post consideration of your written submissions and as per the decision of the Committee, final action letter is being issued enlisting the list of compliances as per **Annexure A**. You are also advised to take necessary steps to ensure that such non-compliances do not recur.
5. Please note that in case the similar non-compliances are observed during a subsequent inspection by the Exchange, applicable action including an escalated penalty may be imposed

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5. Please note that in case the similar non-compliances are observed during a subsequent inspection by the Exchange, applicable action including an escalated penalty may be imposed and pursuant to the Exchange Notice No. 20180214 - 31 dated February 14, 2018 and amendment from time to time.
6. Further, you are requested to submit a compliance certificate, from your Compliance Officer within 10 days from the receipt of this letter stating that all the recommendations made above have been implemented. Failure to furnish the compliance certificate within the timelines or submission of an incorrect compliance certificate (in case similar observations are observed by the Exchange or your internal auditor, etc. post the submission of the compliance certificate) may result in further action being initiated by the Exchange.
7. You are also required to place the letter before your Board for necessary action and the letter is to be taken into consideration by your Board for the performance appraisal of the concerned individual who is responsible for the lapse/ deficiency.

We thank you for your co-operation during the inspection.

Yours faithfully,



**Hansen Cardoza**  
**Dy. General Manager**  
**(Enforcement)**



**Shaila Menon**  
**Asst. Gen Manager**  
**(Enforcement)**

Harendra D. Mehta Share & Stockbrokers Pvt.Ltd.(Clg.no.264)

Annexure A

- a) Details of Non-Compliance observed after considering the responses provided, where no monetary penalty is applicable:

| Sr. No. | Violation  | Notice / Regulatory Requirement  | Action  |
|---------|--|--|---|
| 1       | Non reconciliation of balances between Holding Statement and register of securities. | 20160927-41 dated September 27, 2016, 20190620-37 dated June 20, 2019, 20190829-36 dated August 29, 2019, 20200114-44 dated January 14, 2020.  | Advised to ensure compliance with the relevant regulatory requirements.                                 |
| 2       | Submission of incorrect data towards enhanced supervision- Cash & Cash Equivalent.   | 20160927-41 dated September 27, 2016, 20161020-17 dated October 20, 2016, 20161221-20 dated December 21, 2016, 20170623-14 dated June 23, 2017, 20170925-34 dated September 25, 2017, 20201217-54 dated December 17, 2020, 20210118-31 dated January 18, 2021, 20210927-48 dated September 27, 2021, 20211213-49 dated December 13, 2021 and 20220903-1 dated September 3, 2022. | Warned for reporting incorrect balances to the Exchange under Enhanced Supervision under client assets. |

Details of observations closed after considering the responses provided:-

- Submission of incorrect Net worth Certificate

*(Handwritten mark)*