

L/ENF/JB-3037/IR/2024-2025/402

June 19,2024

Crosseas Capital Services Pvt.Ltd.

Stockbroker (Clg. No. 3037)

805, 806, 806a 8th Floor, Dalal Street Commercial,

Co-Op Soc Ltd, Road 5e, Block 53,

Building No 53(E), Zone 5, Gift City

Gandhinagar-382355

Dear Sir/Madam,

Sub: Inspection of Books of accounts and other documents for Cash Segment for the period April 2019– March 2020

1. After scrutiny of your books of accounts and other documents for Cash segment during Inspection for the Financial Year 2020-2021 covering period April 2019 to March 2020 and findings of inspection was forwarded to you vide letter ref. no. L/DOBS/MM-3037/IR/2022-2023/735 dated March 14, 2023, for your comments and you have provided reply/clarification vide your letter dated August 07, 2023.
2. After taking into consideration of your submissions, final action letter was issued to you vide letter ref. no. L/DOBS/JB-3037/IR/2023-2024/1174 dated August 11, 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 28, 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 advlsed 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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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)

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.	Advise to ensure compliance with the relevant regulatory requirements.
2	Submission of incorrect Net worth Certificate	20210809-50 dated August 9, 2021	Advise to ensure correct computation and submission of net worth to the Exchange.

28
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Details of observations closed after considering the responses provided:-

- Non-tagging of Bank accounts.