

L/ENF/AG-322/IR/2024-2025/948

November 04, 2024

To,
Compliance Officer and Designated Directors
J.G. Shah Financial Consultants Pvt. Ltd (Clg No. 322)
R-418,P.J.Towers,4th Floor Dalal
Street Fort Mumbai-400001

Dear Sir / Madam,

Sub: Final letter pertaining to Inspection of Authorised person viz- Ms. Priti Tejas Vora conducted by the Exchange in FY 2024-25.

Please refer to **Annexure A** to this letter containing the details of non-compliances observed by the Exchange after taking into consideration the submissions and clarifications offered by you. You are also advised to take necessary steps to ensure that such non-compliances do not recur.

A penalty of **Rs. 30,000/- (Rupees Thirty Thousand Only)** is being imposed on you for non-adherence to the regulatory requirements pursuant to the Exchange Notice No. 20180214-31 dated February 14, 2018.

The penalty will be debited to you through the General Charges Bill. However, if you are aggrieved by the penal action described in the aforementioned paragraph, you may submit a request within a time frame of 10 working days from the date of this letter along with necessary documentary evidence and a request for personal hearing, if required, in support of your request.

All correspondence/email in this matter shall be with subject line "*Reply to Final Action Letter <name of the Trading Member> - <Clg. No.> FY 2024-25*" and is to be marked to the mail id Enforcement@bseindia.com.

It may further be noted that any representations made after the lapse of the 10 working days period from the date of this communication shall not be considered by the Exchange and no further extension shall be granted to file a request for seeking waiver from the Exchange.

If the Exchange does not receive any representation from the Trading Member within the prescribed time frame it will be presumed that the Trading Member does not have any objection and has agreed to pay the penalty to the Exchange.



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 pursuant to the Exchange Notice No. 20180214-31 dated February 14, 2018.

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.

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,



Vandana Vania
Asst. Gen Manager
(Enforcement)



Shaila Menon
Asst. Gen Manager
(Enforcement)

Annexure A

Name of the Member	J.G.SHAH FINANCIAL CONSULTANTS PVT.LTD.
Clearing Number	322
Inspection Year	F.Y 24-25
Date of First Letter	September 17,2024
Date of Response to First Letter	September 23,2024 and October 15,2024

• **Details of Non-Compliance observed after considering the responses provided, where monetary penalty is applicable:**

1. **Inspection Observation:** Following information/documents were not displayed by the Authorized Person:
 - Notice Board providing details of the Stock Broker
 - Do's and Don'ts for Investors
 - AP Registration Certificate issued by the Exchange.
 - SEBI Registration Certificate of the Stock Broker

Response from Trading Member:

We refer to your letter dated 17th September 2024 vide the Ref. No. L/EM F/SA — 322/1 R/2024-2025/739. Ref to same we inform you that we had verified the following information / documents which were displayed by the AP on 20/03/2024.

1. Notice Board Providing details of the Stock Broker
2. Do's and Don'ts for Investors
3. AP Registration Certificate issued by the Exchanges
4. SEBI Registration Certificate of the Stock Broker
5. Investor Chartered
6. Grievance / Complaint numbers and emails

We appreciate the observations raised by the Exchange and would like to provide an update on the corrective actions we had implemented post receipt of your observations.

We wish to inform you that our Authorized Person (AP) had displayed all the required information at its place. During Exchange inspection, all these details was available with AP but set aside for reasons of painting work was carried out at her work place. Attached are photographs of the all the required information such as notice board, SEBI registration certificate, AP registration letter, Do's and Dont's,

Handwritten signature/initials

Investor Chartered and Grievance / Complaint numbers and emails displayed at the AP's office for your reference.

In light of these corrective measures, we respectfully request Exchange to drop the said procedural lapses. Further, we also wish to bring to your notice that during our visit, we had observed all the necessary information is being displayed at AP's location and hence we have not reported any non-compliances to Exchange.

Thank you for your understanding and cooperation.

Analysis:

The Member accepted the non-compliance and attributed the same to painting works at the AP location. The AP had accepted the non-compliance during the onsite inspection and had signed POR mentioning the same. The Member also submitted documentary evidence showing display of i.e., pictures of the SEBI Registration Certificate, AP registration certificate, notice board and do and don'ts for investor post-compliance.

It is also noted that the AP traded during the inspection period and also on the date of on-site inspection using IML ID 400670003001012.

Decision:

A penalty of Rs. 30,000 /- is being levied on the Member for not Non display of details viz, Notice Board providing details of the Member, SEBI Registration Certificate of the Member, AP Registration Certificate issued by the Exchange, Do's and Don'ts for Investors, Investor Charter and Grievance / Complaint numbers and emails.

• Details of Non-Compliance observed after considering the responses provided, where no monetary penalty is applicable are as follows:

Sr. No.	Details of Non-Compliance	Notice / Regulatory Requirement	Action
1	The Member has made an incorrect submission with regards to the AP inspection to the Exchange. <ul style="list-style-type: none"> Display of notice board 	20100224-18 dated February 24, 2010	You are advised to ensure that correct submissions are made to the Exchange at all times.

AS