

L/ENF/ARG-339/IR/2024-2025/843

October 08, 2024

To,
Compliance Officer and Designated Directors
Jamnadas Virji Shares & Stock Brokers Pvt. Ltd. (Clg No. 339)
811/812, P.J.Towers, 8th Floor
Dalal Street
Fort
Mumbai-400001

Dear Sir / Madam,

Sub: Final letter pertaining to Inspection of Authorised person viz- Mr. Kinjal Shah 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. 10,000/- (Rupees Ten 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	Jamnadas Virji Shares & Stock Brokers Pvt. Ltd.
Clearing Number	339
Inspection Year	F.Y 24-25
Date of First Letter	September 30, 2024
Date of Response to First Letter	October 04, 2024

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

1. Inspection Observation: Complaint Register was not maintained by the Authorised Person.

Response of the Member: With respect to the trail email, we would like to state that the AP has maintained the Client Visit Register & Complaint Register at his office address and we had checked the same while doing the ap inspection. When the inspecting official had visited our office the AP had kept both the registers at his residence. After the official told him to keep it with him all the time he has now been carrying the same every day. We are enclosing the copy of both the registers for your record. Hope this will suffice the requirement.

Analysis: -

The reply of the Member is not satisfactory. The Complaint Register was not available at the AP location. AP accepted that the same was not maintained by him and had also signed POR mentioning this non-compliance.

It also noted that

- The AP executed trade on behalf of clients using IML ID 4000230003003099 during the inspection period as well as on the date of inspection i.e., on September 18, 2024

Decision:

In view of the above, a **penalty of Rs. 10,000/- (Rupees Ten Thousand Only)** is being levied for non-maintenance of Complaint Register. You may please refer 20180214-31 dated February 14, 2018.

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- 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.	Client Visit register not maintained	20070906-10 dated September 06, 2007.	You are advised to ensure that the Authorized Person maintains Client Visit Register at all times.
2.	Member made an incorrect submission with regards to the AP inspection. The Members has mentioned following points as complied whereas there was non-compliance. <ul style="list-style-type: none"> • Maintenance of Client Visit register. 	20100224-18 dated February 24, 2010.	You are advised to ensure that AP inspections are correctly pointed out and the discrepancies are correctly pointed out and submitted to the Exchange.

AS
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