

L/DOBS/SS-6658/IR/2024-2025/962

November 08, 2024

To,  
Compliance Officer and Designated Directors  
**Anisha Fincap Consultants LLP (Clg. No. 6658)**  
56/33, Site-IV, Industrial Area  
Shibabad  
Ghaziabad-201010

Dear Sir / Madam,

**Sub: Final letter pertaining to Inspection conducted by the Exchange in FY 2024-25**

Please refer to **Annexure A** to this letter with 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. 25,000/- (Rupees Twenty Five 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 2023-24*" and is to be marked to the mail id [Enforcement@bseindia.com](mailto: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

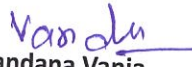
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internal auditor, etc. post the submission of the compliance certificate) may result in further action being initiated by the Exchange.

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**

<b>Name of the Member</b>	<b>Anisha Fincap Consultants LLP</b>
<b>Clearing Number</b>	6658
<b>Inspection Year</b>	F.Y.24-25
<b>Date of First Letter</b>	September 26, 2024
<b>Date of Response to First Letter</b>	October 04 2024

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

1. **Inspection observation:**

On verification of security holding balance reported to the Exchange as on 28-03-2024 in comparison with the demat holding balance on the same date, it is observed that the Member has not reported holding balance of 1 ISIN / securities to the Exchange. Details of the same are as follows:

Date	DMAT Account No.	Account Type	ISIN	Total Quantity in Demat	Total Quantity Reported to the Exchange
28-03-24	120935000000145	Clearing Member	INE723D01021	20,000	0

**Response from Trading Member:**

We would like to inform you that, there was a payout received from the clearing corporation and the same was lying in POOL account.

It may be noted that, due to some technical issue, the payout was not transferred to the client on the same day. Due to aforesaid, holding of the pool account was not picked by the back-office system, as normally no holding lying in pool account in EOD basis.

You are requested, kindly drop the observation and not to impose any penalty to us, as the payout was not transferred, due to technical error and the same was transferred after rectification of the same. We are sharing the transaction for our pool account and client's as well.

**Analysis:**

The Member has accepted the non – compliance and attributed the same to technical issue however the Member has not provided any documentary evidence in support of the same.

On verification of Demat account statement of account number 120935000000145 (Pool Account), it was observed that 20000 quantity of securities pertaining to Himachal Fibres Limited (ISIN INE723D01021), valuing Rs.8,47,200/- were available on March 28, 2024 in the said demat



account. These shares belonged to clients and were not reported to Exchange. Later the shares were transferred to client on April 01 2024.

From the above it is construed that the Member did not reconcile shares lying in its demat accounts and in the Holding Statement (HS) while reporting the same to the Exchange.

**Decision:**

A penalty of Rs.25,000/- (Rupees. Twenty - Five Thousand Only) is being levied on the Member for non-reconciliation of securities lying in its demat accounts and in the Holding Statement (HS) while reporting the same to the Exchange.

You may please refer Exchange notice no. 20150413-30 dated April 13, 2015, 20160927-41 dated September 27, 2016 20190412-43 dated April 12, 2019, 20190620-37 dated June 20, 2019, 20190829-36 dated August 29, 2019 on "Handling of Clients' Securities by Trading Members/ Clearing Members" and.20200114-44 dated January 14 2020.

VS.  
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