

Department: Investigation	Segment: All
Circular No: MSE/ID/12148/2022	Date : August 05, 2022

Subject: SEBI Order in the matter of 3M Team Research Private Limited

To All Members,

This is with reference to Exchange circular no. MSE/ID/8367/2019 dated November 26, 2019, regarding SEBI order no. WTM/MB/WRO/WRO/5737/2019-20 dated November 26, 2019, Exchange Circular no. MSE/ID/8377/2019 dated November 28, 2019 regarding SEBI order no. WTM/MB/WRO/WRO/5737A/2019-20 dated November 27, 2019 and Exchange circular no. MSE/ID/9831/2020 dated December 09, 2020 regarding SEBI order no WTM/MB/WRO/151/2020-21 dated December 07, 2020 in the matter 3M Team Research Private Limited (formerly known as 3M Team Security Services Private Limited)

SEBI now vide order no. WTM/AB/WRO/WRO/18254/2022-23 dated August 04, 2022 has issued the following directions for below mentioned notice.

Sr. No.	Name of the Entity	PAN
1	3M Team Research Pvt. Ltd.	INA000002199/ AAACZ5112B
2	Rakesh Sethi	ATIPS2321R
3	Pramod Jain	AOAPJ9120L

- i. The Noticees shall within a period of three months from the date of coming into force of SEBI order, refund the money received from any complainants/ investors, as fees or consideration or in any other form, in respect of their investment advisory activities or unregistered portfolio management services.
- ii. The Noticees shall issue a public notice in all editions of two National Dailies (one English and one Hindi) and in one local daily with wide circulation, detailing the modalities for refund, including the details of contact person such as names, addresses and contact details, within 15 days of coming into force of SEBI order. A period of two months from the date of the public notice, as stated in the SEBI order, shall be provided to the investors/clients for submitting any claims.
- iii. The repayments to the investors /clients shall be effected only through Bank Demand Draft or Pay Order or electronic fund transfer or through any other appropriate banking channels, which ensures audit trails to identify the beneficiaries of repayments.
- iv. The Noticees are prevented from selling their assets, properties and holding of mutual funds/shares/securities held by them in Demat and physical form except for the sole purpose of making the refunds as directed in the SEBI order. Further, the banks are directed to allow debit from the bank accounts of the Noticees, only for the purpose of making refunds to the investors /clients who were availing the investment advisory services or unregistered portfolio management services from the Noticees.

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- v. After completing the aforesaid repayments, the Noticees shall file a report of such completion with SEBI addressed to the Division Chief, Division of Post - Inspection Enforcement Action, Market Intermediaries Regulation and Supervision Department, SEBI Bhavan II, Plot No. C-7, G Block, Bandra Kurla Complex, Bandra (East) Mumbai – 400051, within a period of 15 days, after completion of three months from the coming into force of SEBI order, duly certified by an independent Chartered Accountant and the direction at sub-paragraph (iv) in the SEBI order shall cease to operate upon filing of such report on completion of refunds to investors /clients, to the satisfaction of SEBI.
- vi. Noticees No. 1, 2 and 3 are debarred from accessing the securities market, directly or indirectly, and are prohibited from buying, selling or otherwise dealing in the securities, directly or indirectly in any manner whatsoever, for a period of one (1) year from the date of SEBI order or till the expiry of one (1) year from the date of completion of refunds to complainants/ investors as directed in sub-paragraph (i) in the SEBI order, whichever is later.
- vii. Noticees No. 1, 2 and 3 shall also, jointly and severally, be liable to pay monetary penalty, as specified hereunder:-

This order is without prejudice to any other action that SEBI may initiate.

The direction for refund, as given in paragraph 36 (i) in the SEBI order, shall not act as a bar on the clients /investors to pursue any other legal remedy available to them under any other law, against the Noticees for refund of money or deficiency in service before any appropriate forum of competent jurisdiction.

The in the SEBI order directions shall come into force with immediate effect.

Members of the Exchange are advised to take note of the full text of the order available on SEBI's website [www.sebi.gov.in] and ensure compliance.

**For and on behalf of
Metropolitan Stock Exchange of India Limited**

**Shalini Rebeiro
Assistant Vice President**