

Department: Investigation	Segment: All
Circular No: MSE/ID/15156/2024	Date : April 08, 2024

Subject: SEBI Order in the matter of Ravindra Bharti Education Institute Private Limited.

To All Members,

SEBI vide order no WTM/KV/MIRSD/MIRSD-SEC-1/30265/2024-25 dated APRIL 05, 2024 has issued the following directions for the below mentioned noticees:

Sr.No.	Noticees	PAN
1.	Ravindra Bharti Education Institute Private Limited	AAHCR6075L
2.	Ravindra Balu Bharti	AVDPB1473A
3.	Shubhangi Ravindra Bharti	BQIPB7764D
4.	Rahul Ananta Gosavi	BOPPG0317E
5.	Dhanashri Chandrakant Giri	BDCPG2078Q

- The Noticees shall cease and desist from offering investment advisory services from acting as or holding themselves out to be investment advisors, whether using 'Ravindra Bharti Education Institute Private Limited' "Ravindra Bharti Wealth" or otherwise. They shall cease to solicit or undertake such activity or any other unregistered or fraudulent activity in the securities market, directly or indirectly, in any manner whatsoever;
- The Noticees are restrained from buying, selling or dealing in securities, either directly or indirectly, in any manner whatsoever until further orders. If the Noticees have any open position in any exchange traded derivative contracts, as on the date of the order, they can close out /square off such open positions within 3 months from the date of order or at the expiry of such contracts, whichever is earlier. The Noticees are permitted to settle the pay-in and pay-out obligations in respect of transactions, if any, which have taken place before the close of trading on the date of SEBI order;
- The Noticees nos. 2 to 5 are hereby restrained from associating themselves with any intermediary registered with SEBI, in any capacity till further orders;
- An amount of INR 12,03,82,130.91 being the total unlawful gain earned from the alleged unregistered investment advisory business, shall be impounded from Noticee no. 1.
- The Noticee no. 1 is directed to credit/deposit the aforesaid amount of unlawful gains to an interest bearing Escrow Account created specifically for the purpose in a Nationalized Bank. The Escrow Account(s) shall create a lien in favour of SEBI and the monies kept therein shall not be released without the permission from SEBI.

Metropolitan Stock Exchange of India Limited

- f. Banks are directed that no debits shall be made, without the permission of SEBI, in respect of the bank accounts held jointly or severally by the Noticee no. 1, except for the purposes of transfer of funds to the Escrow Account. Further, the Depositories are also directed that no debit shall be made without the permission of SEBI, in respect of the demat accounts held by Noticee no.1. However, credits, if any, into the accounts maybe allowed. Banks and the Depositories are directed to ensure that all the aforesaid directions are strictly enforced. Further, debits in the bank accounts may also be allowed for amounts available in the account in excess of the amount to be impounded (INR 12,03,82,130.91). Banks are allowed to debit the accounts for the purpose of complying with SEBI Order.
- g. The Registrar and Transfer Agents are directed to ensure that, they neither permit any transfer nor redemption of the securities, including Mutual Funds units, held by the Noticee no. 1.
- h. The Noticees are directed not to dispose of or alienate any of their assets/properties/securities, till such time the amount of unlawful gain is credited to an Escrow Account except with the prior permission of SEBI.
- i. The Noticees are further directed to provide a full inventory of all their assets whether movable or immovable, or any interest or investment or charge in any of such assets, including property, details of all their bank accounts, demat accounts, holdings of shares/securities if held in physical form and mutual fund investments and details of companies in which they hold substantial or controlling interest immediately but not later than 7 working days of SEBI Order.
- j. The Noticees nos. 1, 4 and 5 are further directed not to collect any money or fee from the existing clients on account of investment advisory business.
- k. The Noticees nos. 1, 4 and 5 are directed to immediately withdraw and remove all websites, advertisements, representations, literatures, videos, brochures, materials, publications, documents, communications, etc. in relation to the unregistered investment advisory services activity, until further orders. The aforesaid information/ data shall continue to be retained by Noticees nos. 1, 4 and 5 for the purpose of quasi-judicial proceedings.

The prima facie observations/findings contained in this Order are made on the basis of the material available on record. In light of the alleged violations of the provisions of the SEBI Act, 1992, IA Regulations and PFUTP Regulations by the Noticees, this Order shall be treated as a Show Cause Notice under sub-section (1) of section 11, clause (d) of sub-section (4) of section 11, sub-section (4A) of section 11, sub-section (1) of section 11B, and sub-section (2) of section 11B, section 11D of SEBI Act 1992, read with clause (d) of sub-regulation (1) of regulation 11 of PFUTP Regulations, read with SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 2005, calling upon Noticees to show cause as to why following directions shall not be passed against them:

- Direction to disgorge an amount equivalent to the total gains made on account of alleged unregistered investment advisory along with interest;
- Direction to restrain them from accessing the securities market and prohibiting them from buying, selling or otherwise dealing in securities for an appropriate period;

- Directions for imposition of penalty under sub-section (4A) of section 11 and sub-section (2) of section 11B read with section 15EB and section 15HB of the SEBI Act, 1992 for carrying out unregistered investment advisory activities.
- Directions for imposition of penalty under sub-section (4A) of section 11 and sub-section (2) of section 11B with section 15HA of the SEBI Act, 1992 for violation of provisions of PFUTP Regulations; and
- Directions for imposition of penalty under sub-section (4A) of section 11 and sub-section (2) of section 11B read with clause (a) of section 15A of the SEBI Act, 1992 for not providing email dump.

The Noticees may file their replies to SEBI within 21 days from the date of receipt of SEBI Order and avail an opportunity of personal hearing in the matter, if they so desire.

This Order is without prejudice to any other action that SEBI may initiate under the securities laws, as deemed appropriate, against the above mentioned persons/entities.

This Order shall come into force with immediate effect and shall be in force till further Orders.

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**

**Vipul Vaishnav
Assistant Vice President**