

Department: Investigation	Segment: All
Circular No: MSE/ID/14815/2024	Date : January 29, 2024

Subject: Final order in the matter of Trustline Holdings Pvt. Ltd. –PMS and Trustline Deep Alpha – AIF

To All Members,

This is with reference to Exchange circular no. MSE/ID/12766/2022 dated December 20, 2022, regarding SEBI Order no. WTM/SM/IVD/ID18/22232/2022-23 dated December 19, 2022 in the matter of Trustline Holdings Pvt. Ltd. –PMS and Trustline Deep Alpha –AIF.

SEBI now vide order No WTM/AN/IVD/ID8/29988/2023-24 dated January 25, 2024, has issued the following directions for below mentioned noticees:

Noticee No.	Name of the Entity	PAN
1	R. Senthil Kumar	BHDPS1290M
2	Geetha N	BSYPG8237Q
3	Prakash V	AOZPP6915J
4	Geetha V	CGDPG9601A

- The Noticees are restrained from accessing the securities market and further prohibited from buying, selling or otherwise dealing in securities, directly or indirectly, whatsoever, from the date of SEBI Order, till expiry of 3 (three) years from the date of payment of disgorgement amount that they are respectively liable for as mentioned in Table 19 of SEBI order;
- Noticees are hereby restrained from associating themselves in any capacity with any listed public company or any public company that intends to raise money from the public, or any intermediary registered with SEBI for a period of 3 (three) years from the date of SEBI Order;
- The Noticees are hereby directed to disgorge the amount in the manner stated in Table 19 of SEBI along with an interest at the rate of 12% simple interest per annum from the respective date indicated in the said table (i.e, the last front running date) till the date of actual payment, within a period of 45 days from the date of receipt of SEBI Order to Investor Protection and Education Fund (IPEF). An intimation regarding the payment of said disgorgement amount directed to be paid herein, shall be sent to "The Division Chief, IVD-ID18, Securities and Exchange Board of India, SEBI Bhavan II, Plot no. C-7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai -400 051".
- The money which has been deposited in escrow account pursuant to the Interim Order cum SCN shall be treated as disgorgement amount for Noticees 1 and 2 and shall be transferred to Investor Protection and Education Fund (IPEF).
- After taking into consideration the role of the Noticees and the violations committed by them, a penalty of Rs. 10,00,000 (Rupees Ten Lakhs only) each is hereby imposed on Noticees 1 and 3. Further,

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a penalty of Rs. 5,00,000 (Rupees Five Lakhs only) each is hereby imposed on Noticees 2 and 4 under section 15HA of SEBI Act.

- f) The Noticees shall remit / pay the said amount of penalties within 45 days from the date of receipt of SEBI order through online payment facility available on the SEBI website www.sebi.gov.in on the following path by clicking on the payment link as mentioned in SEBI order.

This order shall come into force with immediate effect.

For and on behalf of
Metropolitan Stock Exchange of India Limited

Vipul Vaishnav
Assistant Vice President