भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange Board of India

DEPUTY GENERAL MANAGER
WESTERN REGIONAL OFFICE

SEBI/WRO/98341/1
March 07, 2022

To

Mr. Vivek Mahendragiri Ramdati, **(Prop. Vinayak Tradelilnk)** **Third Floor, Office No. 304,** **Cosmo Complex, Mahila College Chowk,** **Rajkot 360001**	श्री विवेक महेंद्रगिरी रामदाती, (प्रोप . विनायक ट्रेड लिंक) तीसरा मंजिल , ऑफिस नंबर ३०४, कोस्मो काम्प्लेक्स , महिला कॉलेज चौक , राजकोट ३६०००१

Sub: Supplementary Show Cause Notice in terms of Para 40 of the Interim Order dated 16.12.2020 issued by SEBI in the matter of Vinayak Tradelink (Prop: Vivek Mahendragiri Ramdati) - under sections 11, 11(4), 11B(1) and 11 D of the Securities and Exchange Board of India Act, 1992.

1. This has reference to the Interim Order dated 16.12.2020 issued by SEBI in the matter of Vinayak Tradelink (Prop: Vivek Mahendragiri Ramdati), wherein it was mentioned that "*SEBI, after ascertaining the quantum of fee collected in the bank accounts of Vinayak Tradelink for refund, shall issue additional Show Cause Notice directing to show cause why the amount collected by Vinayak Tradelink and its proprietor, Mr. Vivek Mahendragiri Ramdati, as fee for investment advisory services, should not be refunded to the investors / clients/ subscribers.*"

2. Based on examination of Punjab National Bank Account statement of the Noticee (account no. 4637002100003176), it is observed that there are large number of credits from several individual investors towards availing various unregistered investment advisory products and services. Further, it has been observed that the aforementioned Bank account has been used by the Noticee to receive payments from the investors for providing unregistered investment advisory services and from 30.05.2020 to 09.12.2020, the Noticee collected Rs. 2,33,90,31,161 from various investors/ clients.

3. In this regard, vide letter dated 04.01.2022 and email dated 11.01.2022 the Noticee was advised to provide information in respect of all the investors who have availed advisory services from the Firm (since the date of incorporation of the Firm), amount collected from each investors as fees, date of collection of amount etc. It was also informed to the Noticee that if no response is received from the Noticee within the stipulated time, it will be construed that all the credit reflected in the bank statement are in the nature of investment advisory fees. Copies of the letter and the email are enclosed at **Annexure A**. Till date, no response has been received from the Noticee and therefore, all the credits reflected in the aforementioned bank statement, are alleged to be in the nature of investment advisory fees collected as unregistered Investment Advisory activity.

4. In view of the above, the Noticee is hereby called upon to show cause as to why the amount collected by the Noticee as fee for unregistered investment advisory services, should not be refunded to the investors/ clients/ subscribers.

5. Your reply, if any, along with relevant documents, should reach us within 21 days of the date of receipt of this notice at the following address:

Securities and Exchange Board of India
SEBI Bhavan,
Western Regional Office
Panchvati 1st Lane,
Gulbai Tekra Road,
Ahmedabad- 380006, Gujarat

6. If personal hearing before the Whole Time Member, SEBI is desired, it shall be indicated in the reply accordingly. The Noticee is advised to keep SEBI informed about the change in its/his correspondence address, if any, till the proceedings in the extant matter are complete.

Yours faithfully,

Rishi Barua

Enclosures: As above

Annexure – A

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange Board of India

MANAGER
WESTERN REGIONAL OFFICE

Registered Post with Acknowledgement

SEBI/WRO/0303/1
January 04, 2022

To

Mr. Vivek Mhendragiri Ramdati, (Prop Vinayak Tradelilnk) Third Floor, Office No. 304, Cosmo Complex, Mahila College Chowk, Rajkot 360001	श्री विवेक महेंद्रगिरी रामदाती, (प्रोप . विनायक ट्रेड लिंक) तीसरा मंजिल , ऑफिस नंबर ३०४, कोस्मो काम्प्लेक्स , महिला कॉलेज चौक , राजकोट ३६०००१

Sub: Interim Order dated December 16, 2020 in the matter of Vinayak Tradelink (Prop: Vivek Mhendragiri Ramdati) and fees collected from clients - Regarding

Sir,

This has reference to the Interim Order dated December 16, 2020 issued by SEBI in the matter of Vinayak Tradelink (Prop: Vivek Mhendragiri Ramdati). In this regard it has been observed that the Bank account with Punjab National Bank (account no. 4637002100003176) has been used to receive payments from the investors for providing unregistered investment advisory services.

In this regard, you are advised to provide the information in the format mentioned below in respect of all the investors who may have availed advisory services from the Firm (since the date of incorporation of the Firm):

S.No.	Client Name	Nature of Advisory Service Availed	Amount Collected as Fees (in Rs.)	Date on which amount collected

The said information is sought in terms of Section 11(2)(ia) of SEBI Act, 1992 and needs to be provided latest by January 19, 2022. If no response is received it will be construed that all the credit reflected in the bank statement are in the nature of investment advisory fees.

Yours faithfully

Pallab Sarkar

Pallab Sarkar

From: Pallab Sarkar
Sent: 11 January 2022 12:28
To: 'vinayaktradelink3603@gmail.com'
Cc: RISHI BARUA
Subject: Interim Order dated December 16, 2020 in the matter of Vinayak Tradelink (Prop: Vivek Mhendragiri Ramdati) and fees collected from clients - Regarding

Sir,

This has reference to the Interim Order dated December 16, 2020 issued by SEBI in the matter of Vinayak Tradelink (Prop: Vivek Mhendragiri Ramdati). In this regard it has been observed that the Bank account with Punjab National Bank (account no. 4637002100003176) has been used to receive payments from the investors for providing unregistered investment advisory services.

In this regard, you are advised to provide the information in the format mentioned below in respect of all the investors who may have availed advisory services from the Firm (since the date of incorporation of the Firm):

S.No.	Client Name	Nature of Advisory Service Availed	Amount Collected as Fees (in Rs.)	Date on which amount collected

The said information is sought in terms of Section 11(2)(ia) of SEBI Act, 1992 and needs to be provided latest by January 19, 2022. If no response is received it will be construed that all the credit reflected in the bank statement are in the nature of investment advisory fees.

Regards,

Pallab Sarkar