



भारतीय प्रतिभूति
और विनिमय बोर्ड

Securities and Exchange
Board of India

SPPED POST WITH ACK DUE

DEPUTY GENERAL MANAGER
NORTHERN REGIONAL OFFICE

SEBI/NRO/NRO/NRO/OW/2023/34479

August..., 2023

Mr. Naresh Pal (Noticee)
Proprietor of Equity Mantra/www.equitymantra.in
PAN- DPDPP1122R
Tahseel Kasganj,
Nagla Mohan/Badanpur, Goyati,
Kasganj, U.P.-207403

Sub: Show Cause Notice under Sections 11 B (1), 11 (4), 11 B (2), 11 (4A) read with Sections 12 (1), 12A, 15 HA, 15HB and 15EB of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as "SEBI Act") and Regulation 3 (1) of the SEBI (Investment Advisers) Regulations, 2013 (hereinafter referred to as "IA Regulations")

1. EQUITY MANTRA, a partnership firm, is registered with SEBI as an Investment Adviser with Registration No. INA100006676 and have its registered address as 135, First floor, F.I.E. Patparganj, DELHI-110092 (hereinafter referred to as "Firm/firm") as per records. The validity of its registration is Nov 08, 2016 - Nov 07, 2021 as per list of SEBI registered intermediaries and the email of the contact person is vijayrana2103@gmail.com. As perused from the details submitted while seeking registration Mr. Vijay Kumar, Mr. Nitin Sharma, Mr. Amit Chauhan and Ms. Neha Jain are the partners in the firm (**Annexure 1**).
2. SEBI received several complaints in SCORES in respect of the said firm during the period October, 2019-August, 2020 (**Annexure 2**). The complaints were forwarded to the firm in the SCORES and repeated reminders were also sent however, the firm failed to file ATRs. Thereafter, emails and letters dated 14.01.2020 and 25.02.2020 were sent to the firm at the said registered address for resolution of complaints, however, no response received from the firm and the letter returned undelivered. Accordingly, a letter dated 25.06.2020 was sent for hand delivery but it could not be delivered as the firm had left the premises (copies of undelivered letter, email and hand delivery report annexed at **Annexure 3**).
3. Pursuant to above, SEBI, vide separate letters dated July 10, 2020 informed all the partners of the aforementioned firm about the pendency of the complaints on SCORES website and advised them to submit the Action Taken Reports (ATRs) (**Annexure 4**).

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"हम हिन्दी पत्राचार का स्वागत करते हैं"



24/8/23

उत्तरी प्रादेशिक कार्यालय : प्लेट-बी, आठवीं मंजिल, ऑफिस टॉवर-1, एन बी सी सी कॉम्प्लेक्स, पूर्व किदवई नगर, नई दिल्ली - 110023

Northern Regional Office : Plate-B, 8th Floor, Office Tower-1, NBCC Complex, East Kidwai Nagar, New Delhi-110023 दूरभाष (Phone) : 011 - 69012998

प्रधान कार्यालय : सेबी भवन प्लेट सं सी-1 'अ' सी-ब्लॉक, राजा जर्नाल कॉम्प्लेक्स, रांछी (झारखंड) - 834005



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Mr. Vijay Kumar one of the partners in the firm vide email dated 22.07.2020 (**Annexure 5**) submitted on behalf of the firm that *"This is in response to your letter dated 5th June 2020 addressed to the Equity Mantra. This is to bring to your notice that Equity Mantra as a company has already been diluted in the Year 2018 and neither company nor any Partner associated is operating in its name by any means. We had also written an intimation mail in this regard to SEBI Office and requested to cancel our Registration No and we have not renewed our license thereafter. To our surprise when we received this letter we tried to investigate the possible reasons for such complaints and found that some Fraud Identity is running a fraud domain on internet with the name same as our company and displaying our SEBI Registration No that has no relation whatsoever either to our original Company or the Partners. Fraud company Domain: equitymantra.in. You are requested to take relevant actions in this regard for impersonating the Identity of Equity Mantra"*.

4. Mr. Amit Chauhan, another partner in the firm vide email dated 18.08.2020 (**Annexure 6**) submitted that *"we have raised the complaint with Cyber Cell against the fraudulent activities committed in our company's name and SEBI reg. no. Further we shall try to make the victims of the fraud to understand that we have no association with the Fraudsters and submit the online report accordingly"*.
5. Mr. Vijay Kumar also submitted copy of an email dated May 19, 2018 written to SEBI intimating that they have decided to wind up their Investment Adviser affairs as unable to generate revenue from the business and requested for cancellation of their Investment Adviser Registration. He also provided a screenshot of website equitymantra.in. The screenshot mentioned the registration no. and registered address of the firm as mentioned in paragraph 1 above.
6. Subsequently, the firm filed ATRs in all the SCORES complaint inter-alia submitting that they have raised the complaint with Cyber Cell against the fraudulent activities committed in their firm's name and SEBI reg. no. under the domain name equitymantra.in that is similar but different from their original domain equitymantra.co.in. They also submitted that they have formally communicated the same to the victims of the fraud that they have no association with the fraudsters and Equity Mantra has no role in any of the frauds impersonating their firm's name and SEBI Reg. In this regard, they also provided copies of emails sent to the complainant and complaint lodged with the Cyber Cell (Documents and a copy of filed ATR in one of the complaint are at **Annexure 7**).
7. Based on the aforesaid ATR and upon perusal of the documents submitted by the complainant, it was observed that some entities were providing unregistered investment advisory through the website www.equitymantra.in (hereinafter referred to as "website") by impersonating the registration number and name of the aforementioned SEBI registered firm.





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8. Accordingly, the matter has been examined by SEBI in terms of provisions of SEBI Act, SEBI (Investment Advisers) Regulations, 2013 (hereinafter referred to as "IA Regulations") and SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (hereinafter referred to as "PFUTP Regulations").
9. Upon examination of information provided in the complaints, documents provided by the complainants Banks, payment gateways, website, whoislookup, GST registration certificate the following are observed:
- The website www.equitymantra.in is not operational at present. However, from the website 'Whois lookup', it is found that the domain has expired during October 2020. Further, the screenshots of website provided by the firm and the archived pages of the website obtained from archive.org were examined. From the extracts of the said website, it is noted that the alleged impersonator has inter-alia declared itself as Investment Adviser and research house under SEBI Reg. No. INA100006676 and name Equity Mantra offering technical and trading Analysis and tips in all fields of Commodity Market and Share Market Trading through different products namely Stock Cash, Options, HNI Cash, Stock Future, HNI Options etc. The addresses and emails mentioned on the website are 135, 1st Floor, FIF, Patparganj, Delhi-110095 (the registered address of the firm) and Alpha One Mall Sarkari Vasahat Road, Ahmedabad 380006 and emails-support@equitymantra.in and enquiry@equitymantra.in.
 - From the analysis of complaints and bank/payment gateway accounts (details placed at **Annexure 8**), it is observed that all the complainants who have claimed to pay Equity Mantra have indeed paid different amounts in Equity Mantra's Bank and Payment gateway A/cs. Further, all the aforesaid bank/payment gateway accounts are opened in name of Equity Mantra by its proprietor Mr. Naresh Pal (hereinafter referred to as Noticee). Further, the Noticee is not registered with SEBI in any capacity as per the records available at SEBI website.
 - In the website of Equity Mantra i.e., www.equitymantra.in, the Noticee has provided this website address to PayU while opening the account. Further, from the screenshots provided by one of the complainant it is observed that links of same website were sent to the complainant. Hence, it is noted that the entity Equity Mantra against which the SCORES complaints were received is the proprietorship firm of the Noticee with website www.equitymantra.in and accordingly, Equity Mantra proprietorship firm of the Noticee is noted to be different from the SEBI Registered Equity Mantra, details of which are mentioned at paragraph 1 above.
 - Based on the address and emails observed from the website and KYC details, SEBI vide letters dated 28.12.2021 and reminder email dated 08.03.2022 sought information from the Noticee in respect to the advisory services provided to clients,





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fees collected from clients etc. were sent to the entity. The said letters and email returned undelivered (**Annexure 9**) and no response received by SEBI from the entity till date.

- v. It is understood that the modus operandi of the Noticee is prima-facie noted to be that it approaches the prospective clients as SEBI registered Investment Adviser - Equity Mantra and to facilitate opening of Demat A/c and ask an initial upfront fee of Rs. 3000/-, 3500/- etc. as registration fee/service charge/commission for opening of account. The entity also provided free/trial to the clients. Once the client pays the initial amount, client is asked to deposit a relatively bigger amount viz. Rs. 10,000/-, Rs. 55,000/- etc. in their own accounts for onward depositing in the proposed Demat Account. They assured return to the clients on investments done based on advices given by them through different plans viz. "Equity Plan". Once, the client deposits the amount in their account they either block the client or demand more money. In one of the cases it was also observed that a big amount was straight away transferred when it was said to the complainant that the initial/registration fee can be paid from the profits earned from investments made on the advice.
- vi. The entity is not operational as on date as the website is not operational and as per the Whois lookup, the domain expired during October 2020. The last credit entry observed in the bank account is of 24.07.2020 and total amount collected by the entity is at least Rs. 1,06,67,711.30/-
- vii. From the above, it is observed that the Noticee held themselves out as Investment Adviser and approached the complainants as SEBI registered Investment Advisor. It used and shared the details of website www.equitymantra.in which is having the details of another SEBI Registered firm with similar name and also shared its account details with their prospective clients for payment of fees. As brought out in points above, through the website they inter-alia declared itself as Investment Adviser and research house under SEBI Reg. No. INA100006676 and name Equity Mantra offering technical and trading Analysis and tips in all fields of Commodity Market and Share Market Trading through different products namely Stock Cash, Options, HNI Cash, Stock Future, HNI Options etc.
10. It is noted that noticee is not registered with SEBI in any capacity.

As per Regulation 2 (m) of the SEBI (Investment Advisers) Regulations, 2013 ("IA Regulations")

"investment adviser means any person, who for consideration, is engaged in the business of providing investment advice to clients or other persons or group of persons and includes any person who holds out himself as an investment adviser, by whatever name called"



Handwritten signature and date: 24/8/23



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The Noticee has held themselves out as investment adviser and has offered investment advisory services in form of different packages collecting fees/charges for same.

Therefore, the Noticee have carried out the business of investment advisory of without getting registered with SEBI.

11. Further, in order to sale their services, the entity has also misled and misrepresented to its clients by assuring returns and using credentials of another SEBI Registered Investment Adviser. Accordingly, it concealed the risks associated while dealing in securities and the fact that it was not registered with SEBI. By deliberately disseminating such false and misleading claims, the entity had influenced and induced the decisions of its clients as evident from the details of complaints.

12. Applicable / relevant Sections of SEBI Act, Regulations of IA and Regulations of PFUTP -

Section 12 (1) of the SEBI Act reads as:

*"No stock broker, sub-broker, share transfer agent, banker to an issue, trustee of trust deed, registrar to an issue, merchant banker, underwriter, portfolio manager, **investment adviser** and such other intermediary who may be associated with securities market shall buy, sell or deal in securities except under, and in accordance with, the conditions of a certificate of registration obtained from the Board in accordance with the regulations made under this Act"*

Sections 12 A (a), (b) and (c) of the SEBI Act read as:

"No person shall directly or indirectly—

(a) use or employ, in connection with the issue, purchase or sale of any securities listed or proposed to be listed on a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of this Act or the rules or the regulations made thereunder;

(b) employ any device, scheme or artifice to defraud in connection with issue or dealing in securities which are listed or proposed to be listed on a recognised stock exchange;

(c) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person, in connection with the issue, dealing in securities which





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are listed or proposed to be listed on a recognised stock exchange, in contravention of the provisions of this Act or the rules or the regulations made thereunder;"

Regulation 3 (1) of the IA Regulations:

"On and from the commencement of these regulations, no person shall act as an investment adviser or hold itself out as an investment adviser unless he has obtained a certificate of registration from the Board under these regulations:

Provided that a person acting as an investment adviser immediately before the commencement of these regulations may continue to do so for a period of six months from such commencement or, if it has made an application for a certificate under sub regulation (2) within the said period of six months, till the disposal of such application".

Regulation 2 (m) of the IA Regulations defines investment adviser as:

"investment adviser means any person, who for consideration, is engaged in the business of providing investment advice to clients or other persons or group of persons and includes any person who holds out himself as an investment adviser, by whatever name called".

Regulation 2 (l) of the IA Regulations defines investment advice as:

"advice relating to investing in, purchasing, selling or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral or through any other means of communication for the benefit of the client and shall include financial planning:"

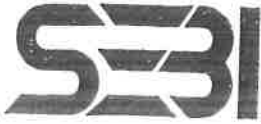
Regulation 2 (1) (c) of the PFUTP Regulations defines fraud as:

"“fraud” includes any act, expression, omission or concealment committed whether in a deceitful manner or not by a person or by any other person with his connivance or by his agent while dealing in securities in order to induce another person or his agent to deal in securities, whether or not there is any wrongful gain or avoidance of any loss, and shall also include—

- (1) a knowing misrepresentation of the truth or concealment of material fact in order that another person may act to his detriment;*
- (2) a suggestion as to a fact which is not true by one who does not believe it to be true;*
- (3) an active concealment of a fact by a person having knowledge or belief of the fact;*
- (4) a promise made without any intention of performing it;*
- (5) a representation made in a reckless and careless manner whether it be true or false;*
- (6) any such act or omission as any other law specifically declares to be fraudulent;*
- (7) deceptive behavior by a person depriving another of informed consent or full participation,*
- (8) a false statement made without reasonable ground for believing it to be true.*



rules
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(9) the act of an issuer of securities giving out misinformation that affects the market price of the security, resulting in investors being effectively misled even though they did not rely on the statement itself or anything derived from it other than the market price.

And "fraudulent" shall be construed accordingly;

Nothing contained in this clause shall apply to any general comments made in good faith in regard to—

- (a) the economic policy of the government
- (b) the economic situation of the country
- (c) trends in the securities market or
- (d) any other matter of a like nature

whether such comments are made in public or in private"

Regulations 3 of the PFUTP Regulations

"3. Prohibition of certain dealings in securities

No person shall directly or indirectly—

- (a) buy, sell or otherwise deal in securities in a fraudulent manner;
- (b) use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under;
- (c) employ any device, scheme or artifice to defraud in connection with dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange;
- (d) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under."

Regulations 4 (1) of the PFUTP Regulations

"Without prejudice to the provisions of regulation 3, no person shall indulge in a manipulative, fraudulent or an unfair trade practice in securities markets.

Explanation.—For the removal of doubts, it is clarified that any act of diversion, misutilisation or siphoning off of assets or earnings of a company whose securities are listed or any concealment of such act or any device, scheme or artifice to manipulate the books of accounts or financial statement of such a company that would directly or indirectly manipulate the price of securities of that company shall be and shall always be deemed to have been considered as manipulative, fraudulent and an unfair trade practice in the securities market."





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Regulations 4 (2) (k) of the PFUTP Regulations

"disseminating information or advice through any media, whether physical or digital, which the disseminator knows to be false or misleading in a reckless or careless manner and which is designed to, or likely to influence the decision of investors dealing in securities"

Regulations 4 (2) (o) of the PFUTP Regulations

"fraudulent inducement of any person by a market participant to deal in securities with the objective of enhancing his brokerage or commission or income"

Regulations 4 (2) (s) of the PFUTP Regulations

"mis-selling of securities or services relating to securities market;

Explanation-For the purpose of this clause, "mis-selling" means sale of securities or services relating to securities market by any person, directly or indirectly, by—

- (i) knowingly making a false or misleading statement, or*
- (ii) knowingly concealing or omitting material facts, or*
- (iii) knowingly concealing the associated risk, or (iv) not taking reasonable care to ensure suitability of the securities or service to the buyer"*

13. In view of the above, it is alleged that the Noticee have carried out the activity of investment advisory without obtaining registration from SEBI, thereby, the Noticee have violated Section 12 (1) of the SEBI Act read with Regulation 3 (1) of the SEBI IA Regulations

14. Further, in view of the misrepresentations / concealment of facts done by the Noticee which were detrimental to the interests of the investors which is covered under the definition of fraud as per Regulation 2 (1) (c) of the PFUTP Regulations, it is also alleged that the Noticee have also violated Sections 12 A (a), (b) and (c) of the SEBI Act, 1992 read with Regulations 3 (a), (b), (c) and (d), 4 (1) and 4 (2) (k), (o) and (s) of the PFUTP Regulations .

15. In view of the above, the Noticee is called upon to show cause as to why suitable directions including directions for debarment, refund and penalty under sections 11B (1), 11 (4), 11 B(2), 11 (4A) read with Section 15 HA (for PFUTP violations), 15 HB (for unregistered IA activities for violations till 08.03.2019) and 15EB (for unregistered IA activities for violations after 08.03.2019) of the SEBI Act, 1992 should not be issued against him for the alleged violations referred to hereinabove.





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16. The reply of the Noticee, if any, should reach the undersigned, at the address given below, as well as through email at virsaahabs@sebi.gov.in and anupams@sebi.gov.in (in MS-Word format), within 21 days from the date of receipt of this notice, failing which it shall be construed that the Noticee have no reply to submit and the matter shall be proceeded on the basis of the material available on record.

Securities and Exchange Board of India
Northern Regional Office,
8th floor, Plate B, Tower 1,
NBCC Complex,
East Kidwai Nagar, New Delhi - 110023.

17. If you are desirous of a personal hearing before the Whole Time Member, SEBI, the same may be intimated accordingly.
18. You are advised to keep SEBI informed about the change in your correspondence address, if any, and provide updated email-id and phone numbers, till the proceedings are complete. You are also advised to submit a photocopy of your Income Tax Permanent Account Number card (PAN Card) for our records. Documents relied upon in the notice have been annexed as per the list of enclosures.
19. You may also note that a settlement mechanism is provided under the SEBI (Settlement Proceedings) Regulations, 2018. If you wish to opt for the settlement process, you may apply for the same in the manner given in the aforesaid regulations under intimation to the undersigned.


Vir Sahab Singh



Enc.-As above

1. Annexure 1 – Copy of partnership deed of Equity Mantra registered with SEBI
2. Annexure 2 – List of complaints
3. Annexure 3 - Copies of undelivered letter, email and hand delivery report
4. Annexure 4 - Letters dated July 10, 2020
5. Annexure 5 – Email dated 22.07.2020
6. Annexure 6 – Email dated 18.08.2020
7. Annexure 7 - Documents and a copy of filed ATR in one of the complaint
8. Annexure 8 – Details of bank/payment gateway accounts
9. Annexure 9 - Undelivered letters and email returned

Annexure - 1
Attachment - 13(a)



सत्यमेव जयते

INDIA NON JUDICIAL

Government of National Capital Territory of Delhi

e-Stamp

Certificate No.	IN-DL581306961096580
Certificate Issued Date	09-Jun-2016 03:25 PM
Document Reference	IMPACC (17) 41942203 DELHI 000118
Unique Document Number	SUBIN-DL942203156149629085570
Purchased by,	NITIN SHARMA
Description of Document	Article 46 Partnership
Property Description	Not Applicable
Consideration Price (Rs.)	0 (Zero)
First Party	NITIN SHARMA
Second Party	VIJAY KUMAR
Stamp Duty Paid By	NITIN SHARMA
Stamp Duty Amount (Rs.)	100 (One Hundred only)



Please Write or type below the following text

THIS NON JUDICIAL STAMP PAPER
FOR RS. 100/-
FORMS THE PART OF AGREEMENT
FOR Partnership deed
EXECUTED BY Nitin Sharma
on 09 Jun 2016

For EQUITY MANTRA

Partner

Handwritten notes at the top right of the page.

Partnership Deed
Between
1. Mr. [Name]
2. Mr. [Name]
3. Mr. [Name]
4. Mr. [Name]
5. Mr. [Name]
6. Mr. [Name]
7. Mr. [Name]
8. Mr. [Name]
9. Mr. [Name]
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93. Mr. [Name]
94. Mr. [Name]
95. Mr. [Name]
96. Mr. [Name]
97. Mr. [Name]
98. Mr. [Name]
99. Mr. [Name]
100. Mr. [Name]

WHEREAS the partners in this deed will carry on the business of
advisory under the name and style of **Ms Equity Mantra at For -** for the purpose of
SITUATED AT P.L.P. Patpuranj Delhi - 11002 in the terms and conditions mentioned in
this Partnership Deed.

AND WHEREAS it is deemed necessary and desirable that a regular list of Partnerships
reduced in writing and executed on the terms and conditions mentioned hereunder

NOW THIS DEED WITNESSETH AS UNDER:

1. The Partnership shall come into effect from **1st June 2016** and shall be for a period of **10** years unless it is determined.
2. That the name and style of the Partnership firm hereby formed **Ms Equity Mantra** under the same names and style or with branch or branches at such places as the partners may mutually decide.
3. That the business of the Partnership firm hereby formed shall be to carry the activities of investment advisory. The partners may, however, with their mutual consent embark upon a new line or lines of business and may open branch or branches or new office or offices.

EQUITY MANTRA
[Signature]
Partner

At the time of the formation of the firm, the capital of the firm shall be contributed by the partners in such ratio as may be mutually agreed upon. Interest at the rate of or at a rate as may be mutually agreed upon between the partners from time to time shall be allowed on the capital standing to his/her credit for the time being in the books of the partnership.

5. That interest allowed on the capital of the firm shall be contributed by the partners in such ratio as may be mutually agreed upon. Interest at the rate of or at a rate as may be mutually agreed upon between the partners from time to time shall be allowed on the capital standing to his/her credit for the time being in the books of the partnership.

6. That the regular accounts books shall be kept in due course of business in which shall be faithfully recorded all the transactions enter into by the firm and such books shall be closed on 31st March of every financial year or on any other convenient or auspicious day as may be mutually agreed upon between the partners hereto from time to time.

7. That on closing the account books in the aforesaid manner, a regular profit & Loss Account shall be prepared and a balance sheet shall be drawn up.

8. That the Profits & Losses shall be divided between and borne by all the partners in equal ratio/proportions i.e. 1/4 each.

9. That all rights of the firm from incorporation namely Trade marks, Sales Tax registration, Telephone connections, Tenancy rights, Lease rights, Ownership right etc. shall be deemed to be the rights of the partnership and all the partners hereto will have equal rights/liabilities thereon.

10. To the fullest extent permitted by applicable law and professional regulations, either Party agrees to indemnify the other party, against all claims by any third parties (including its lenders, suppliers or affiliates) and resulting liabilities, losses, damages, costs and expenses (including reasonable external and internal legal costs) arising out of any personal dealing which such Partner may have with such third Party, whether in his (such partner's) individual capacity or as a representative of another partnership, body corporate

or HUF. which cannot or it being caused any loss or damage to the Partnership or even any of the other Partners.

11. That each partner shall

(a) Diligently attend to the business of the Partnership and devote his/her full time and attention thereto

(b) Punctually pay her/his separate debts and indemnify the other partner and the Assets of the firm against the same and all expenses therefore

(c) Upon every reasonable request inform the other Partner of all letters, accounts, writings and such other things which shall come to her/his hands or knowledge concerning the business of the Partnership.

12. That neither Partner shall without the consent of the others:-

(a) Lend any of the money of the firm to any person or persons whom the other Partners shall have previously in writing forbidden her/him to do so.

(b) Raise or advance any loan in the name of or on behalf of the firm

(c) Assign, charge or transfer her/his shares in assets or profits of the firm.

13. That the account in the name of the firm shall be opened with the Banks or bankers as the Partner may mutually decide and the same shall be operated upon by the partners hereto jointly.

14. That any partner may retire from the Partnership firm hereby formed by giving three months notice in writing to the others but none shall leave the firm until or unless so done.

15. That the partners hereunto, however, with their mutual consent, may at any time or any of the partners hereto at a rate that may be mutually agreed upon, increase or decrease the time to time. They shall be at liberty to increase or decrease such rate of remuneration with their consent from time to time.

16. That in the event of death or retirement of any of the partners hereto the partnership firm hereby formed shall not dissolve, but shall continue. The legal heir or the representative of the deceased shall step into her/his shoes as follows.

For party 1 his share shall devolve upon:

Name: Ashish Kumar Jain

Address: A-209 Surya Nagar, Ghaziabad UP 201011

Son of: S.C Jain

PAN: ADKPJ7920D

For party 2 his share shall devolve upon:

Name: Sunil Sharma

Address: D-45 Ramprastha Colony, Ghaziabad UP 201011

Son of: Hanuman Prasad Sharma

PAN: ABHPS5371A

For party 3 his share shall devolve upon:

Name: Parmal Singh Chauhan

Address: NP 958, Ram Nagar, Near Primary School, Etawah -206001

Son of: Khoob Singh Chauhan

PAN: ABBPC4614J

For party 4 his share shall devolve upon:

Name: Ruma Devi

Address: Village Kalgram, Post Office Sehli, Distt Mandi, Himachal Pradesh 175052

W/O: L.D. Dharam Paul

PAN: BEKPD0229E

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19. That it will always remain the policy of the firm to carry on its business in accordance with the terms or terms of this Deed of Partnership and any amendments, annulling or changing any of the provisions of this deed shall be required to be executed

20. That without prejudice to the above terms and conditions, all disputes and other matters shall be governed by the provisions of Indian Partnership Act, 1932.

21. That all the disputes or differences arising out of it and connected with it shall be referred to the arbitrator in accordance with the Indian Arbitration Act, 1996.

IN WITNESS WHERE OF, All the partners have put their signatures and seals on this DEED OF PARTNERSHIP on the day, month and year first mentioned above.

Partners

1. Ramesh Jain

2. Nitin Sharma

3. Amit Chaudhary

4. Vijay Kumar

Vijay Kumar

Sl. No.	Registration No	VIP	Complainant Name / Complaint Lodged by	Complaint Against	Category	Complaint Status	Date of Receipt
1	SEBIP/DH21/0000103/1	--	LAXMAN RAM KASANA	Equity Mantra	Investment Adviser	Disposed	24/02/2021
2	SEBIE/DH21/0000045/1	--	Chethan R Naik	Equity Mantra	Investment Adviser	Disposed	07/12/2020
3	SEBIE/DH20/0001621/1	--	Sushant Ashok Kadam /	Equity Mantra	Investment Adviser	Disposed	12/08/2020
4	SEBIE/DH20/0001333/1	--	Raj Dharmendra Patel	Equity Mantra	Investment Adviser	Disposed	13/08/2020
5	SEBIE/DH20/0001197/1	--	prathamesh matondkar	Equity Mantra	Investment Adviser	Disposed	20/07/2020
6	DARPG/E/2020/03651	--	Mushtaq Ahmad Gaani	Equity Mantra	Investment Adviser	Disposed	22/02/2020
7	SEBIE/DH20/0000530/1	--	SURAJIT JOARDAR	Equity Mantra	Investment Adviser	Disposed	20/01/2020
8	SEBIE/DH20/0000448/1	--	pradeep sitaram verma	Equity Mantra	Investment Adviser	Disposed	10/01/2020
9	SEBIE/DH20/0000364/1	--	Sanjay Suman	Equity Mantra	Investment Adviser	Disposed	31/01/2020
10	SEBIE/DH20/0000312/1	--	Abbasuddin molla	Equity Mantra	Investment Adviser	Disposed	24/01/2020
11	SEBIE/DH20/0000294/1	--	Nasiruddin	Equity Mantra	Investment Adviser	Disposed	21/12/2019
12	SEBIE/DH20/0000293/1	--	Nasiruddin	Equity Mantra	Investment Adviser	Disposed	21/12/2019
13	SEBIE/DH19/0001250/1	--	Sandeep Bhingale	Equity Mantra	Investment Adviser	Disposed	03/10/2019

Annexure 3

(Dial 1800 266 6856)



RD347454170IN IVR:8268347454170
 RL CONVALENT PLACE 50 (110001)
 Counter No:4,25/02/2020,17:41
 To:VIJAY KUMAR,,
 PIN:110092, Laxmi Nagar 50 East Delhi
 From:SEBI,ND
 Wt:20gms
 Amt:25.00(Cash)
 Track on www.indiapost.gov.in

बोर्ड
 Exchange

ASSISTANT GENERAL MANAGER
 NORTHERN REGIONAL OFFICE

NRO/IMD/GRA/OW/ 7249 /2020
 February 25, 2020

Shri Vijay Kumar
 135, First Floor,
 F.I.E. Patparganj,
 Delhi- 110092

Subject: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Dear Sir,

1. This has reference to your registration with SEBI as an Investment Advisor bearing registration no. INA100006676.
2. In this regard, it is observed that the below mentioned complaints, received in SCORES, have not been redressed by you even after repeated reminder send in SCORES and through emails:

Sr.no.	SCORES registration no.	Name of the Complainant	Date of receipt
1	SEBIE/DH20/0000530/1	SURAJIT JOARDAR	20-Feb-2020
2	SEBIE/DH20/0000448/1	pradeep sitaram verma	10-Feb-2020
3	SEBIE/DH20/0000364/1	Sanjay Suman	31-Jan-2020
4	SEBIE/DH20/0000312/1	Abbasuddin molla	24-Jan-2020
5	SEBIE/DH20/0000293/1	Nasiruddin	21-Jan-2020
6	SEBIE/DH20/0000294/1	Nasiruddin	21-Jan-2020
7	SEBIE/DH19/0001250/1	Sandeep Bhingle	03-Nov-2019

3. You are, therefore, advised to redress the above mentioned complaints on an urgent basis and submit an action taken report, within 7 days of receipt of this letter, failing which appropriate action will be initiated against you.

Yours sincerely,

Gafrana Roshan Anjum

“हम हिन्दी पत्राचार का स्वागत करते हैं।”

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

~~Signature~~ R.P.

Shri Vijay Kumar
135, First Floor,
F.I.E. Patparganj,
Delhi- 110092

Subject: Pending complaints in SCORFs

— Gofans



पॉचवा तल, बैंक ऑफ बड़ौदा भवन, 16, संसद मार्ग, नई दिल्ली - 110001
5TH FLOOR, BANK OF BARODA BUILDING, 16, SANSAD MARG, NEW DELHI - 110001



100

(Dial 1800 266 6855)



RD3474541701N IVR:626834745417
RL CONNAUGHT PLACE SO (110001)
Counter No:4,25/02/2020,17:41
To:VIJAY KUMAR,,
PIN:110092, Laxmi Nagar SO East Delhi
From:SEBI,ND
Wt:20gms
Amt:25.00(Cash)
(Track on www.indiapost.gov.in)

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ASSISTANT GENERAL MANAGER
NORTHERN REGIONAL OFFICE

NRO/IMD/GRA/OW/ 7249 /2020
February 25, 2020

Shri Vijay Kumar
135, First Floor,
F.I.E. Patparganj,
Delhi- 110092

Subject: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Dear Sir,

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4	SEBIE/DH20/0000312/1	Abbasuddin molla	24-Jan-2020
5	SEBIE/DH20/0000293/1	Nasiruddin	21-Jan-2020
6	SEBIE/DH20/0000294/1	Nasiruddin	21-Jan-2020
7	SEBIE/DH19/0001250/1	Sandeep Bhingle	03-Nov-2019

3. You are, therefore, advised to redress the above mentioned complaints on an urgent basis and submit an action taken report, within 7 days of receipt of this letter, failing which appropriate action will be initiated against you.

Yours sincerely,

Gafana Roshan Anjum

“हम हिन्दी प्रसारण का स्वागत करते हैं।”



भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

ASSISTANT MANAGER
NORTHERN REGIONAL OFFICE

NRO/IMD/V/OW/11068/1/2020
June 25, 2020

Shri Vijay Kumar
Equity Mantra
135, First Floor,
F.I.E. Patparganj, Delhi-110092

Sub: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Sir,

1. This has reference to your registration with SEBI as an Investment Adviser with registration no. INA100006676.
2. A letter no. NRO/IMD/GRA/OW/7249/2020 dated February 25, 2020 on the captioned subject (copy attached) has been sent to you, however the said letter has returned undelivered.
3. You are, therefore, advised to redress the complaints mentioned in the aforementioned letter on an urgent basis and submit the action taken reports in SCORES within 7 days of receipts of this letter, failing which appropriate action will be initiated against you.

Yours faithfully,


Vinayak

Enclosed: a/a

By Hand Delivery

“हम हिन्दी पत्राचार का स्वागत करते हैं।”

6/25/2020

FW: FW: Pending complaint in SCORES

21

FW: FW: Pending complaint in SCORES

Vinayak

Sent: 25 June 2020 16:57:17

To: vijayrana2103@gmail.com; Enquiry@equitymantra.in; support@equitymantra.in

Attachments: Equity Mantra.pdf (155 KB)

Sir,

Please find attached a letter on captioned matter and trailing mails.

Regards

IMD-NRO

----- Forwarded message -----

From: GAFRANA ANJUM <gafranaa@sebi.gov.in>

Date: 25 Feb 2020 3:30 pm

Subject: FW: Pending complaint in SCORES

To: vijayrana2103@gmail.com

Cc: DINESH JOSHI <dineshj@sebi.gov.in>, support@equitymantra.in, enquiry@equitymantra.in

Sir,

This has reference to the complaint mentioned in the trailing email. It is observed that in addition to the mentioned complaint, the following complaints are also pending with you in SCORES:

1. SEBIE/DH20/0000530/1
2. SEBIE/DH20/0000448/1
3. SEBIE/DH20/0000364/1
4. SEBIE/DH20/0000312/1
5. SEBIE/DH20/0000294/1
6. SEBIE/DH20/0000293/1

You are advised to immediately redress the above mentioned complaints and submit action taken report within 7 days, failing which appropriate action will be taken against you.

Regards

Gafrana Roshan Anjum

AGM

SEBI, NRO

From: GAFRANA ANJUM

Sent: 14/01/2020 02:53 P To: 'vijayrana2103@gmail.com' <vijayrana2103@gmail.com>

Cc: DINESH JOSHI <dineshj@sebi.gov.in>

Subject: FW: Pending complaint in SCORES

Dear Sir,

This has reference to the pending complaint bearing SCORES registration no. SEBIE/DH19/0001250/1 against Equity Mantra, Investmnt Adviser. In this regard, it is observed that you have not responded to the complaint even after being reinded. You are, therefore, advised to immediately resolve the above mntioned complaint in SCORES, and submit action taken report, at the earliest.

Regards

Gafrana

22

Gafrana Roshan Anju

AG

SEBI-NRO

011-23451020

Vinayak

From: Vinayak
Sent: 25/06/2020 4:57 PM
To: vijayrana2103@gmail.com; Enquiry@equitymantra.in; support@equitymantra.in
Subject: FW: FW: Pending complaint in SCORES
Attachments: Equity Mantra.pdf

Sir,

Please find attached a letter on captioned matter and trailing mails.

Regards
IMD-NRO

----- Forwarded message -----

From: GAFRANA ANJUM <gafranaa@sebi.gov.in>
Date: 25 Feb 2020 3:30 pm
Subject: FW: Pending complaint in SCORES
To: vijayrana2103@gmail.com
Cc: DINESH JOSHI <dineshj@sebi.gov.in>, support@equitymantra.in, enquiry@equitymantra.in

Sir,

This has reference to the complaint mentioned in the trailing email. It is observed that in addition to the mentioned complaint, the following complaints are also pending with you in SCORES:

1. SEBIE/DH20/0000530/1
2. SEBIE/DH20/0000448/1
3. SEBIE/DH20/0000364/1
4. SEBIE/DH20/0000312/1
5. SEBIE/DH20/0000294/1
6. SEBIE/DH20/0000293/1

You are advised to immediately redress the above mentioned complaints and submit action taken report within 7 days, failing which appropriate action will be taken against you.

Regards



(२५)

भारतीय प्रतिभूति
और विनियम बोर्ड
**Securities and Exchange
Board of India**

**ASSISTANT MANAGER
NORTHERN REGIONAL OFFICE**

NRO/IMD/V/OW/11068/1/2020
June 25, 2020

**Shri Vijay Kumar
Equity Mantra
135, First Floor,
F.I.E. Patparganj, Delhi-110092**

Sub: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Sir,

1. This has reference to your registration with SEBI as an Investment Adviser with registration no. **INA100006676**.
2. A letter no. NRO/IMD/GRA/OW/7249/2020 dated February 25, 2020 on the captioned subject (copy attached) has been sent to you, however the said letter has returned undelivered.
3. You are, therefore, advised to redress the complaints mentioned in the aforementioned letter on an urgent basis and submit the action taken reports in SCORES within 7 days of receipts of this letter, failing which appropriate action will be initiated against you.

Yours faithfully,


Vinayak

Enclosed: a/a

By Hand Delivery

“हम हिन्दी पत्राचार का स्वागत करते हैं।”

25

(Report on service of Letter by way of affixture)
(To be filled in by the Department/Division)

Name of the entity:	Equity Mantra
Name of the premises where Letter is affixed:	Equity Mantra, 135, First Floor, F.I.E. Patparganj, Delhi-110092

(To be filled in by the person affixing the Letter)

Name of the person affixing the Letter: _____

Date: 26/6/2020 Time: 05:04 P.M

This is to state that the undersigned has affixed a copy of the Letter reference no. _____ dated _____ addressed to _____ at the above mentioned premises.

Name, signature and address of the person affixing the Letter:

Sign: [Signature]
Name: Sumil Kumar
Address: Delhi

Further, that the affixing of Letter at the above premises have been witnessed by the following person(s):

Name, signature/thumb impression and address of the witnesses:

Witness - 1	Witness - 2
Sign/ Thumb Impression: <u>[Signature]</u>	Sign/ Thumb Impression: <u>[Signature]</u>
Name: <u>Pankesh Singh</u>	Name: <u>Kul Kunal</u>
Address <u>H.No 309 Tikay Pur Kotha</u> <u>Kotha Vihar - II, Nazafgarh Rd</u> <u>Ngla, N.D - 43</u>	Address <u>Govt Chhaya</u> <u>UP 201102</u>



भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

ASSISTANT MANAGER
NORTHERN REGIONAL OFFICE

NRO/IMD/V/OW/116 29/1
July 10, 2020

Vijay Kumar, Partner, Equity Mantra
Village Kalgram, PO Sehli, Teh Sadar
Mandi, Himachal Pradesh-175052

Sub: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Sir,

1. This has reference to your registration with SEBI as an Investment Adviser with registration no. **INA100006676**.
2. Letters no. NRO/IMD/GRA/OW/7249/2020 dated February 25, 2020 and NRO/IMD/V/OW/11068/1/2020 on the captioned subject (copies attached) have been sent at the last available correspondence address and mail of the captioned entity, however the said letters have returned undelivered. We have also not received any response to the mails written on the captioned subject (copies of mail attached).
3. You are, therefore, advised to redress the complaints mentioned in the aforementioned letter/mails on an urgent basis and submit the action taken reports in SCORES within 7 days of receipts of this letter, also, provide explanations for the delay in attending complaints and for no response in respect of the correspondences from SEBI as mentioned in point 2 above, failing which appropriate actions will be initiated against you.

Yours faithfully,


Vinayak

Enclosed: a/a

“हम हिन्दी पत्राचार का स्वागत करते हैं।”



ASSISTANT MANAGER
NORTHERN REGIONAL OFFICE

भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

NRO/IMD/V/OW/11630/1
July 10, 2020

Nitin Sharma, Partner, Equity Mantra
D-45, Ramprastha, Ghaziabad
Uttar Pradesh-201011

Sub: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Sir,

1. This has reference to your registration with SEBI as an Investment Adviser with registration no. INA100006676.
2. Letters no. NRO/IMD/GRA/OW/7249/2020 dated February 25, 2020 and NRO/IMD/V/OW/11068/1/2020 on the captioned subject (copies attached) have been sent at the last available correspondence address and mail of the captioned entity, however the said letters have returned undelivered. We have also not received any response to the mails written on the captioned subject (copies of mail attached).
3. You are, therefore, advised to redress the complaints mentioned in the aforementioned letter/mails on an urgent basis and submit the action taken reports in SCORES within 7 days of receipts of this letter, also, provide explanations for the delay in attending complaints and for no response in respect of the correspondences from SEBI as mentioned in point 2 above, failing which appropriate actions will be initiated against you.

Yours faithfully,


Vinayak

Enclosed: a/a

“हम हिन्दी पत्राचार का स्वागत करते हैं।”



(28)

भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

**ASSISTANT MANAGER
NORTHERN REGIONAL OFFICE**

NRO/IMD/V/OW/11631/1
July 10, 2020

**Amit Chauhan, Partner, Equity Mantra
182, Maidan Garhi, Chattarpur
Delhi-110068**

Sub: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Sir,

1. This has reference to your registration with SEBI as an Investment Adviser with registration no. **INA100006676**.
2. Letters no. NRO/IMD/GRA/OW/7249/2020 dated February 25, 2020 and NRO/IMD/V/OW/11068/1/2020 on the captioned subject (copies attached) have been sent at the last available correspondence address and mail of the captioned entity, however the said letters have returned undelivered. We have also not received any response to the mails written on the captioned subject (copies of mail attached).
3. You are, therefore, advised to redress the complaints mentioned in the aforementioned letter/mails on an urgent basis and submit the action taken reports in SCORES within 7 days of receipts of this letter, also, provide explanations for the delay in attending complaints and for no response in respect of the correspondences from SEBI as mentioned in point 2 above, failing which appropriate actions will be initiated against you.

Yours faithfully,


Vinayak

Enclosed: a/a

“हम हिन्दी पत्राचार का स्वागत करते हैं।”

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

SPEED Post



FBI पाँचवा तल, बैंक ऑफ बड़ौदा भवन, 16, संसद मार्ग, नई दिल्ली - 110001
5TH FLOOR, BANK OF BARODA BUILDING, 16, SANSAD MARG, NEW DELHI - 110001
Vivek

11/05/00



(30)

भारतीय प्रतिभूति
और विनियम बोर्ड
**Securities and Exchange
Board of India**

**ASSISTANT MANAGER
NORTHERN REGIONAL OFFICE**

NRO/IMD/V/OW/11627/1
July 10, 2020

**Ms Neha Jain, Partner, Equity Mantra
A-209, Surya Nagar, Chander Nagar S.O.,
Ghaziabad, Uttar Pradesh-201011**

Sub: Pending complaints in SCORES against Equity Mantra, Investment Advisor

Sir,

1. This has reference to your registration with SEBI as an Investment Adviser with registration no. **INA100006676**.
2. Letters no. NRO/IMD/GRA/OW/7249/2020 dated February 25, 2020 and NRO/IMD/V/OW/11068/1/2020 on the captioned subject (copies attached) have been sent at the last available correspondence address and mail of the captioned entity, however the said letters have returned undelivered. We have also not received any response to the mails written on the captioned subject (copies of mail attached).
3. You are, therefore, advised to redress the complaints mentioned in the aforementioned letter/mails on an urgent basis and submit the action taken reports in SCORES within 7 days of receipts of this letter, also, provide explanations for the delay in attending complaints and for no response in respect of the correspondences from SEBI as mentioned in point 2 above, failing which appropriate actions will be initiated against you.

Yours faithfully,

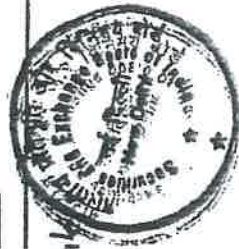

Vinayak

Enclosed: a/a

“हम हिन्दी पत्राचार का स्वागत करते हैं।”

SE+A1:K12CURIITIES AND EXCHANGE BOARD OF INDIA
5TH FLOOR BANK OF BARODA BUILDING
16 SANSAD MARG NEW DELHI-110001
SPEED POST BOOKING LIST

DATE & MONTH	NAME	STATE	PINCODE	BARCODE		OFFICER'S NAME	BAR CODE STICKER
13.07.2020	NITIN SHARMA	UP	201011 ED	94738705	IN 7	VINAYAK	ED947387057IN
13.07.2020	NEHA JAIN	UP	201011 ED	94738706	IN 5	VINAYAK	ED947387065IN
13.07.2020	VIJAY KUMAR	HP	175052 ED	94738707	IN 4	VINAYAK	ED947387074IN
13.07.2020	PAWAN RANJAN KUMAR	DELHI	110055	ED 94738708	IN 8	MIRSD	ED947387088IN



DEL117866969

By Courier

Vinayak

10-7-2020 Anit

—

—

By Courier

Vinayak

31

7/22/2020

Gmail - Fwd: Winding up "Equity Mantra" - An Investment Adviser Firm.



39
Annexure 5
amit chauhan <amit.chauhan086@gmail.com>

Fwd: Winding up "Equity Mantra" - An Investment Adviser Firm.

vijay kumar <vijayrana2103@gmail.com>
To: amit chauhan <amit.chauhan086@gmail.com>

Sat, May 30, 2020 at 1:08 PM

----- Forwarded message -----

From: vijay kumar <vijayrana2103@gmail.com>
Date: Sat, 19 May, 2018, 6:22 AM
Subject: Winding up "Equity Mantra" - An Investment Adviser Firm.
To: KANCHAN YADAV <kanchany@sebi.gov.in>

Dear Kanchan,

Greeting for the day!!!

This is with respect to the Equity Mantra, we decided to wind up our Investment Adviser affairs as unable to generate revenue from the business. Our Registration Number is- INA100006676.

So, It is our request to you to please cancel our Investment Adviser Registration number .

Thank You.

Regards,
Vijay Kumar.
Equity Mantra.

(35)

Vinayak

From: vijay kumar <vijayrana2103@gmail.com>
Sent: 22/07/2020 11:14 PM
To: Vinayak
Subject: Re: FW: FW: Pending complaint in SCORES
Attachments: Fraud Domain Screenshots.docx; Gmail - Fwd_ Winding up _Equity Mantra_ - An Investment Adviser Firm_.pdf

Dear Sir,

This is in response to your letter dated 5th June 2020 addressed to the Equity Mantra.

This is to bring to your notice that Equity Mantra as a company has already been diluted in the Year 2018 and neither company nor any Partner associated is operating in its name by any means. We had also written an intimation mail in this regard to SEBI Office and requested to cancel our Registration No and we have not renewed our license thereafter (Attached copy of the mail for your reference).

To our surprise when we received this letter we tried to investigate the possible reasons for such complaints and found that some Fraud Identity is running a fraud domain on internet with the name same as our company and displaying our SEBI Registration No that has no relation whatsoever either to our original Company or then Partners. Fraud company Domain: equitymantra.in (Screenshots attached for your reference)

You are requested to take relevant actions in this regard for impersonating the Identity of Equity Mantra.

We again request you to kindly accept our request to cancel the registration no immediately so that no other innocent person falls prey to such Fraudulent activities henceforth.

Further any details required from my end please write to me or you may also ask the representative to reach me on 7018611474.

Thanking You,
Vijay Kumar

For Equity Mantra

On Thu, Jun 25, 2020 at 4:57 PM Vinayak <Vinayak@sebi.gov.in> wrote:
Sir,

Please find attached a letter on captioned matter and trailing mails.

Regards
IMD-NRO

----- Forwarded message -----

From: GAFRANA ANJUM <gafranaa@sebi.gov.in>
Date: 25 Feb 2020 3:30 pm
Subject: FW: Pending complaint in SCORES

Vinayak

From: Vinayak
Sent: 18/08/2020 2:40 PM
To: 'amit.chauhan086@gmail.com'; 'vijayrana2103@gmail.com'
Subject: FW: Complaint regarding fraudulent activities done in the Name of Equity Mantra.

Sir,

In respect of the trailing mail and the intimations sent thru SCORES, it is advised to send formal written responses to all the complainants at the addresses and e-mails provided by them in the SCORES. Also, attach the copies of responses sent to the complainants and copy of the complaint made to Cyber Cell along with the complaint number/FIR number given by Cyber Cell while submitting ATRs to SEBI in SCORES.

Regards
Vinayak

From: amit chauhan [mailto:amit.chauhan086@gmail.com]
Sent: 18/08/2020 12:53 PM
To: Vinayak
Cc: vijay kumar
Subject: Re: Complaint regarding fraudulent activities done in the Name of Equity Mantra.

Dear Mr. Vinayak,

As discussed the other day we have raised the complaint with Cyber Cell against the fraudulent activities committed in our company's name and sebi reg no.

PFA complaint details.

Further we shall try to make the victims of the fraud to understand that we have no association with the Fraudsters and submit the online report accordingly.

(Kindly allow us a couple of days so as to complete this activity.

Regards,
Amit Chauhan
8076233963

On Mon, 17 Aug, 2020, 09:10 vijay kumar, <vijayrana2103@gmail.com> wrote:

Dear Sir,

With due respect I want to bring to your notice that I along with my other 3 partners were running the company named Equity Mantra Sebi Reg No: INA100006676 located at 135, 1st Floor, FIE, Patparganj, Delhi, 110095 with Domain Name equitymantra.co.in. We stopped its operation in Nov'2017 and had vacated the premises by that time. Recently via a notification from SEBI it has come to our notice that there are some complaints registered in our name and then we realized that some one is impersonating our company name with our Sebi

Annexure 7
(41)

Cyber Crime Incident

Complaint / Incident Details

Acknowledgement Number : 20808200039281

Complaint Type : Report and Track

Category of complaint

Any Other Cyber Crime

Sub-Category of complaint

Other

OTHER

Fraudulent usage of my company name and SEBI Reg No

Approximate Date:

22/07/2020 HH : N/A MM : N/A PM

Reason for delay in reporting:

The matter was under discussion with the SEBI Authority for required actions

Supporting Evidence:

Description	Text Information	Supporting Evidence
Website URL	https://equitymantra.in/	Attachment.jpg

Please provide any additional information about the incident:

With due respect I want to bring to your notice that I along with my other 3 partners were running the company named Equity Mantra Sebi Reg No: INA100006676 located at 135, 1st Floor, FIE, Patparganj, Delhi, 110095 with Domain Name equitymantra.co.in . We stopped its operation in Nov'2017 and had vacated the premises by that time. Recently via a notification from SEBI it has come to our notice that there are some complaints registered in our name and then we realized that some one is impersonating our company name with our Sebi Registration No and are doing fraudulent activities with general public in our name using the domain name equitymantra.in and have given the same address as of ours online. Following are the complaints received on SEBI against our SEBI Registration no for which we are not involved and all fraudulent activities are been done by someone impersonating our company's name and registration no. DARPG/E/2020/03651 SEBI/DH19/0001250/1 SEBI/DH20/0000293/1 SEBI/DH20/0000312/1 SEBI/DH20/0000364/1 SEBI/DH20/0000448/1 SEBI/DH20/0000530/1 SEBI/DH20/0001197/1 I am attaching the screenshot of the Fraud website along with this complaint. In the above context I request you to register our complaint and take the necessary action against this Fraud.

Suspect Details

Suspect Name	ID Type	Country Code	ID Number
N/A	N/A	N/A	N/A

Please Upload Any Photograph of Suspect's:

N/A

Address for Suspect

House No.	N/A	Country	N/A
Street Name	N/A	State	N/A
Colony	N/A	District	N/A
VIII / Town / City	N/A	Police Station	N/A
Tehsil	N/A	Pincode	N/A

Complainant Details

Name	Mr Amit Chauhan
Mobile No.	8076233963
Gender.	Male
DOB.	15/03/1988
Father Name :	Parmal Singh Chauhan

8/20/2020

Gmail - Response to Complaint SEBIE/DH19/0001250/1



amit chauhan <amit.chauhan086@gmail.com>

Response to Complaint SEBIE/DH19/0001250/1

amit chauhan <amit.chauhan086@gmail.com>
To: sandeepbhingle@gmail.com

Thu, Aug 20, 2020 at 2:02 PM

Dear Concern,

With reference to your complaint no
SEBIE/DH19/0001250/1

registered under SCORES please be informed that the Company Equity Mantra was winded up in the month of Nov'2017 and we have no relation with the impersonator who is claiming online to be Equity Mantra and displaying our sebi registration no: INA100006676.

As soon as we came into our cognizance of the committed frauds we started to investigate on our end and found that there is an impersonator online under the website (equitymantra.in) displaying our registration no whereas our original website was under the domain name (equitymantra.co.in) and would be committing such frauds.

We have also raised a complaint in cyber cell wrt same. The copy is attached for your perusal.

Also we request you to take off your complaint against our company and register the fresh complaint against the actual Fraud. You may register a legal complaint against the actual Fraudsters or any other action deemed fit in your capacity.

Thanks!
Equity Mantra

Complaint_Detail_20808200039281.pdf
4K



Complaint Details

Action History

Complaint Details

Registration No DARPG/E/2020/03651
Name Mushtaq Ahmad Gaani
Address Ar-reyan colony,
Pincode 190014
State Jammu And Kashmir
Nature of Complaint
Email Address yesmushtq111@gmail.com
Complaint Against Equity Mantra
Company Name
Date Of Receipt 22 FEB 2020
Category Assigned Investment Adviser
Mobile No. 9149834965

VIP Reference Name

Complaint Details

Dear Sir, Please be informed that on 27th Jan2020 I received call from Mr Ashish Jain on behalf of Equity Mantra for assistance with respect to investment in equity portfolio. Knowing Company's investments advisory and their market reputation I responded positively and authorized them to deal my portfolio but he informed me that I have to pay registration fee & service charges to which I agreed to pay for service of Rs3000/-only and promised for registration fee of Rs 3500/ later on after gap of one month after we both agreed I gave details of my Depository A/c and password etc.and Mr.Ashish started instant tradings .However, next day he suggested me to open Depository A/c with Angle broking and facilitated opening of a/c with them in the process of opening of a/c he told me transfer an amount of Rs 55000/-(rupee's fifty five thousand to Co's Current a/c for onward transfer to my Trading a/c/Depository a/c with ,Angel broking but till to day neither Mr Ashish Jain nor Equity Mantra Co has transferred an amount of Rs 55000/- to my Depository account despite repeated reminders and phone calls In this respect Securities & Exchange Control Board of India was also informed about their assistance in the refund of amount,but with no positive response. You are as such requested to please help me to redress my grivence by taking up the matter with the said investment advisory Co for refund of amount immediately With Regards (Mushtaq Ahmad)

Have you lodged a complaint with the concerned Intermediary / listed company for redressal of your complaint?
 Yes No

Print

ATR Details

9/1/2020

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Dealing Officer

* Remarks/Reason[max 2000 characters allowed]:

Dear Concern We have raised the complaint with Cyber Cell against the fraudulent activities committed in our companys name and sebi reg no. by the Fraudster using the domain name equitymantra.in that is similar but different from our original domain equitymantra.co.in. PFA complaint lodged with the Cyber Cell. Further we have formally communicated the same to the victims of the fraud to understand that we have no association with the Fraudsters and Equity Mantra has no role in any of the Frauds impersonating its name and Sebi Reg No. PFA the copy of othe formal communication made with the complainants. Regards Equity Mantra

Status: Closed - Others

Document1 : DARPG202003651ATR1.pdf Document1 :

Preview

Document2 : DARPG202003651ATR2.pdf Document2 :

Preview

* Acceptance

Accepted Edit

Take Action

Registration No DARPG/E/2020/03651

Category Assigned Investment Adviser

Nature of Complaint

* Decision

Refresh

Click on Refresh button if not getting correct dropdown values

Submit

Cancel

Confidential

2.4. KYC and A/c statements associated with accounts details provided by the complainant are obtained (annexed at pages 128-177). Further, it is observed from the documents provided by the complainant and bank statements that Equity Mantra has A/Cs in PayU and Safexpay (Paygate) payment gateways, accordingly, KYC and A/c statements associated with the said payment gateway accounts are also obtained (annexed at pages 195-220). Details of all the said Bank and Payment gateway accounts are as follows-

Sl. No.	Account No. and Bank	KYC Details
1	IndusInd Bank, Account number- 257303046719	Account is noted to be in name of EQUITY MANTRA. Mr. Naresh Pal, Proprietor is the authorized signatory and the account is opened on 02.08.2019 and Dormant as on 01.09.2022. A GST registration certificate with no. 07DPDPP1122R2ZK in name of Mr. Naresh Pal Proprietor of EQUITY Mantra is also observed. G/F Old No.-1205, 2602-2603, Naya Bazar, Nai Basti, Chandani Chowk-110006 is the address of Equity Mantra. DPDPP1122R is the PAN of Mr. Naresh Pal and Tahseel Kasganj, Nagla Mohan/Badanpur, Goyati, Kasganj, U.P.-207403 is his address. Last credit entry in the account is of 14.07.2020 and total credit received in A/c is Rs. 62,73,160.3/-
2	Equitas SF Bank, Account number- 200001097750	Account is noted to be in name of M/s EQUITY MANTRA Prop Mr NARESH PAL and the account is opened on 07.07.2019 and account is open/regular as on 11.03.2022. A GST registration certificate with no. 07DPDPP1122R2ZK in name of Mr. Naresh Pal Proprietor of EQUITY Mantra is also observed. G/F Old No.-1205, 2602-2603, Naya Bazar, Nai Basti, Chandani Chowk-110006 is the address of Equity Mantra. DPDPP1122R is the PAN of Mr. Naresh Pal and Tahseel Kasganj, Nagla Mohan/Badanpur, Goyati, Kasganj, U.P.-207403 is his address. Last credit entry in the account is of 22.02.2020 and total credit received in A/c is Rs. 5,72,660/-
3	Safexpay Payment gateway	A/c is in the name of Merchant EQUITY MANTRA and is already deactivated as on 04.09.2020. A GST registration certificate with no. 07DPDPP1122R2ZK in name of Mr. Naresh Pal Proprietor of EQUITY Mantra is also observed. G/F Old No.-1205, 2602-2603, Naya Bazar, Nai Basti, Chandani Chowk-110006 is the address of Equity Mantra. DPDPP1122R is the PAN of Mr. Naresh Pal and Tahseel Kasganj, Nagla Mohan/Badanpur, Goyati, Kasganj, U.P.-207403 is his address. Last credit entry in the account is of 05.02.2020 and total credit received in Safexpay is Rs. 1153157/-



TMS

4	PayU Payment gateway-	A/c is in the name of EQUITY MANTRA website- https://www.equitymantra.in/ . G/F Old No.-1205, 2602-2603, Naya Bazar, Nai Basti, Chandani Chowk-110006 is the address of Equity Mantra. DPDPP1122R is the PAN of Mr. Naresh Pal. Last credit entry in the account is of 16.09.2019 and total credit received in PayU is Rs. 26,68,734/-.
---	-----------------------	--

2.5. An analysis of the statements of the aforementioned Banks and payment Gateway accounts is done for finding entries pertaining to amount claimed to be deposited by the complainant and observations in this regard are as following-

Complainant name who claimed to deposit amount in Equity Mantra A/cs	Observations from statements (Bank/Payment Gateway A/c name-Date-Amount)
LAXMAN RAM KASANA	Indus Ind Bank-29/11/2019-Rs. 20000, 03/12/2019-Rs. 20000, 05/12/2019-Rs. 15000, 21/12/2019-Rs.48000/- and 02/01/2020-Rs. 20000, Total-Rs. 123000/-
Chethan R Naik	PayU-04/10/2019-Rs. 8455
Sushant Ashok Kadam /	Safexpay- 31/12/2019- Rs.36000/-, PayU-19/11/2019-Rs. 55000, Total-Rs. 91000/-
prathamesh matondkar	PayU-15/07/2020-Rs. 24157
Mushtaq Ahmad Gaani	Indus Ind Bank- 27/01/2020-Rs. 58000/-
SURAJIT JOARDAR	Indus Ind Bank- 12/02/2020-Rs. 8000/-, Safexpay-10/12/2019- Rs.34500/-
pradeep sitaram verma	Safexpay- 16/12/2019- Rs.25003/-
Sanjay Suman	PayU-24.01.2020-Rs. 11436/-, 25/01/2020-Rs. 13564/- and 29/01/2020-Rs. 25000/-, Total-Rs. 50000/-
Abbasuddin molla	Indus Ind Bank-10/12/2019-Rs. 5000, 16/12/2019-Rs. 10299, 17/12/2019-Rs. 10000/-, 19/12/2019-Rs. 20299, 24/12/2019-Re. 1, 25/12/2019-Rs. 20000, 27/12/2019-Rs. 64651. Safexpay-11/12/2019-Rs. 19326/- Total-149576/-
Nasiruddin	Safexpay- 20/12/2019-Rs. 10001/-
Sandeep Bhingle	Indus Ind Bank-26.09.2019-Rs. 3000/-

2.6. Therefore, from points above it is concluded that all the complainants who have claimed to pay Equity Mantra have indeed paid different amounts in Equity Mantra's Bank and Payment gateway A/cs details of which are shared with them by Equity Mantra. Further, all the aforesaid bank/payment gateway accounts are opened in name of Equity Mantra by its proprietor Mr. Naresh Pal (as checked from list of SEBI registered intermediaries he is not registered with SEBI in any capacity, search result annexed at page 178) and the website of Equity Mantra is www.equitymantra.in (herein after



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Vinayak

From: Mail Delivery System <MAILER-DAEMON@MUSBDSTMIMS2.sebi.gov.in>
To: Enquiry@equitymantra.in; support@equitymantra.in
Sent: 08/03/2022 4:35 PM
Subject: Undeliverable: Examination in the matter of Complaints against Equity Mantra

Delivery has failed to these recipients or groups:Enquiry@equitymantra.in

A problem occurred and this message couldn't be delivered. Check to be sure the e-mail address is correct. If the problem continues, please contact your helpdesk.

support@equitymantra.in

A problem occurred and this message couldn't be delivered. Check to be sure the e-mail address is correct. If the problem continues, please contact your helpdesk.

Diagnostic information for administrators:

Generating server: MUSBDSTMIMS2.sebi.gov.in

Enquiry@equitymantra.in

#< #5.4.4 X-Postfix; Host or domain name not found. Name service error for name=equitymantra.in type=A: Host not found> #SMTP#

support@equitymantra.in

#< #5.4.4 X-Postfix; Host or domain name not found. Name service error for name=equitymantra.in type=A: Host not found> #SMTP#

Original message headers:

Return-Path: <Vinayak@sebi.gov.in>

Received: from MUSBDSTMIMS2.sebi.gov.in (unknown [127.0.0.1])

by IMSVA (Postfix) with ESMTP id 0F3D78C1F1;

Tue, 8 Mar 2022 16:35:01 +0530 (IST)

DKIM-Signature: v=1; a=rsa-sha256; c=simple/simple; d=sebi.gov.in;

s=5EB1_M5S_OCT2019; t=1646737501;

bh=/x13hW9vCx6trHIPi87yNuRbYkffQHrt7mjRYLZVGU=; h=From:To:Date;

b=dzxijJRLsPOoCqVrr3OAF6FPCFcCokgXaiXpMKJw35odxu+SuCPH6r5SKJr4PV+St

IsLHqOzrcgb5xnrx3R3sYKYQVs4XO4EFSRhX13sMNkoD0u43Ch17grtdJBGD0Unl+1

UWaUcE7HA92JauTGtuSp7GPID7Bo3ctVSm6CFGk4=

Received: from MUSBDSTMIMS2.sebi.gov.in (unknown [127.0.0.1])

by IMSVA (Postfix) with ESMTP id E3B698C1E4;

Tue, 8 Mar 2022 16:35:00 +0530 (IST)

Received: from MUSBDSTMIMS2.sebi.gov.in (unknown [10.201.7.106])

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by MUSBDSTMIMS2.sebi.gov.in (Postfix) with ESMTTP;
Tue, 8 Mar 2022 16:35:00 +0530 (IST)
Received: from MUSBDSDLPMAIL2 (MUSBDSDLPMAIL2 [127.0.0.1])
by MUSBDSDLPMAIL2.localdomain (Service) with ESMTTP id A7D722008F5B;
Tue, 8 Mar 2022 16:35:02 +0530 (IST)
Received: from webmail.sebi.gov.in (unknown [10.201.7.107])
by MUSBDSDLPMAIL2.localdomain (Service) with ESMTTP id 90B202008F59;
Tue, 8 Mar 2022 16:34:36 +0530 (IST)
From: Vinayak <Vinayak@sebi.gov.in>
To: "Enquiry@equitymantra.in" <Enquiry@equitymantra.in>,
"support@equitymantra.in" <support@equitymantra.in>
CC: GYANENDRA NIRAJ <gyanendran@sebi.gov.in>
Subject: Examination in the matter of Complaints against Equity Mantra
Thread-Topic: Examination in the matter of Complaints against Equity Mantra
Thread-Index: Adgy2hPmhrM+DeNcS66qhIZtd2+I/A==
Date: Tue, 8 Mar 2022 11:04:18 +0000
Message-ID: <F9D4DD86E9DF1F4486A053045FDE36E50165859CCA@SEBIDCEXMB02>
Accept-Language: en-IN, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
x-classification: SEBI-INTERNAL
x-originating-ip: [172.16.14.110]
Content-Type: text/plain
MIME-Version: 1.0
X-TM-AS-GCONF: 00

191

Vinayak

From: Vinayak
Sent: 08/03/2022 4:34 PM
To: Enquiry@equitymantra.in; support@equitymantra.in
Cc: GYANENDRA NIRAJ
Subject: Examination in the matter of Complaints against Equity Mantra
Attachments: SKM_558e22030816300.pdf

Sir,

You are advised to submit the information thru return email sought *vide* attached letters in respect of captioned subject along with supporting documents within 07 days from the date of receipt of this communication failing which we will proceed based on available information and necessary action will be taken as deemed fit.

Vinayak

भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

S. Post



Naresh Pal, Prop. Equity Mantra
G/FOLD No.-1205, 2602-2603,
Naya Bazaar, Mai Basti,
Chandni Chowk, Delhi-110006

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AM(v)



उत्तरी प्रादेशिक कार्यालय : प्लेट-बी, आठवीं मंजिल, ऑफिस टॉवर-1, एन बी सी सी कॉम्प्लेक्स, पूर्व किदवाई नगर, नई दिल्ली - 110023
Northern Regional Office : Plate-B, 8th Floor, Office Tower-1, NBCC Complex, East Kidwai Nagar, New Delhi - 110023

*Mr. B. K. Sharma
4/1/72
Rmtho Address
Jy*



भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

S. Post

Naresh Pal, Prop. Equity Mantra
S/o Dhaniram Tahseel Kasganj,
Nagla Mohan/Badanpur, Goyati,
Kasganj, Uttar Pradesh-207403

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AM(V)



उत्तरी प्रादेशिक कार्यालय : प्लेट-बी, आठवीं मंज़िल, ऑफिस टॉवर-1, एन बी सी सी कॉम्प्लेक्स, पूर्व किदवाई नगर, नई दिल्ली - 110023
Northern Regional Office : Plate-B, 8th Floor, Office Tower-1, NBCC Complex, East Kidwai Nagar, New Delhi - 110023



बिना माली जातुल ओर २७
श्री. प्रमोद चौधरी

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

English
Address

Speed Post

Equity Mantra
Alpha One Mall
Sarkari Vasahat Road,
Vastrapur, Ahmedabad,
Gujarat-380006



881

AM(V)



उत्तरी प्रादेशिक कार्यालय : प्लेट-बी, आठवीं मंजिल, आफिस टावर-1, एन बी सी सी कॉम्प्लेक्स पूर्व किदवई नगर, नई दिल्ली - 110023
Northern Regional Office : Plate-B, 8th Floor, Office Tower-1, NBCC Complex, East Kidwai Nagar, New Delhi - 110023

Insufficient
Address
6-1-21
tw





(187)

भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

By Speed Post AD / Email

39982
SEBI/NRO/OW/PI/ 12021

28/12/2021

Naresh Pal, Prop. Equity Mantra
G/F Old No.-1205, 2602-2603,
Naya Bazaar, Nai Basti
Chandani Chowk, Delhi-110006

Sir,

For attention of- Naresh Pal, Prop. Equity Mantra

Sub.: Examination of products/services offered by www.equitymantra.in/Equity Mantra/Naresh Pal

1. Under the SEBI Act 1992 read with SEBI (Investment Advisers) Regulations, 2013 and SEBI (Portfolio Managers) Regulations, 2020 no person shall act as an Investment Advisers and Portfolio Manager unless the entity has obtained a certificate of registration from SEBI under the said Regulations. Acting as an Investment Advisers and/or Portfolio Manager without SEBI registration may entail to initiation of action, as deemed fit, under the SEBI Act 1992.
2. SEBI has observed that you are offering various financial products / services in the nature of Investment Advisory and/or Portfolio Manager in the name of www.equitymantra.in/Equity Mantra/Naresh Pal. In this regard, you are advised to provide the following information along with the supporting documents, if any:
 - i. Registered corporate address of www.equitymantra.in/Equity Mantra/Naresh Pal along with the phone numbers, email ids, legal structure (Individual/Proprietorship/Partnership/LLP/ Company etc.), PAN and date of incorporation.
 - ii. Name, address, PAN, email ids and phone numbers of Proprietor /all Promoters / Directors / Partners of www.equitymantra.in/Equity Mantra/Naresh Pal along with their educational qualifications, experience in activities relating to advice in relating to various financial products.

“हम हिन्दी पत्राचार का स्वागत करते हैं।”



Continuation Sheet

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भारतीय प्रतिभूति

और विनियम बोर्ड

Securities and Exchange
Board of India

- iii. With respect to point (ii) above, provide details of association of the aforesaid Proprietor / all Promoters / Directors / Partners of **www.equitymantra.in/Equity Mantra/Naresh Pal** with any other proprietorship / partnership / LLP / company/ SEBI registered Intermediary along with the nature of the association and the date of inception of such association.
- iv. Brief note on all activities / services / products offered by **www.equitymantra.in/Equity Mantra/Naresh Pal** since inception till date along with the date of commencement of the aforesaid activities/services/products.
- v. With respect to above point, provide the information year-wise since inception till date in the following format:

Sr. No.	F.Y.	Client Name	Name of the Package/Service offered	Total amount of fee charged from the client during the F.Y.	Mode of receipt of payment from Client (cash deposit/ NEFT/ Payment gateway etc.)	Details of the advise

- vi. List of all bank accounts maintained and highlight the bank accounts where advisory fees collected.
- vii. List of payment gateways, the arrangement and copy of all the documents.
- viii. Scheme details, pamphlets, brochures, promotional materials, etc., related to advisory activities:
- ix. Details of any arrangement / agreement in connection with the advisory related activities and other relevant documents available.
- x. Whether **www.equitymantra.in/Equity Mantra/Naresh Pal** ever been registered with any of the recognized Stock Exchanges / SEBI / other regulators in any capacity whatsoever? If yes, furnish the details thereof.
- xi. A copy of the audited Annual Accounts of **www.equitymantra.in/Equity Mantra/Naresh Pal** for the last three financial years.
- xii. A copy of account statement of all the bank accounts of **www.equitymantra.in/Equity Mantra/Naresh Pal** pertaining to last three financial years.



Continuation Sheet

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भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

- xiii. A copy of account statement of all the payment gateways used by **www.equitymantra.in/Equity Mantra/Naresh Pal** for receiving fees from clients for advisory/portfolio management services) from the date of operating to till date.
- xiv. Details of all the websites of **www.equitymantra.in/Equity Mantra/Naresh Pal** and entity/persons responsible for hosting and maintaining the said websites.
- xv. Any other relevant information that **www.equitymantra.in/Equity Mantra/Naresh Pal** may wish to submit.
3. You are advised to submit the aforesaid information along with supporting documents within 15 days from the date of receipt of this communication. The same information shall also be submitted through email to the undersigned.

Vinayak

email-vinayak@sebi.gov.in



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भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

By Speed Post AD / Email

39983
SEBI/NRO/OW/PI /2021

28/12/2021

Naresh Pal, Prop. Equity Mantra
S/o Dhaniram Tahseel Kasganj,
Nagla Mohan/Badanpur, Goyati,
Kasganj, Uttar Pradeesh-207403

Sir,

For attention of- Naresh Pal, Prop. Equity Mantra

Sub.: Examination of products/services offered by www.equitymantra.in/Equity Mantra/Naresh Pal

1. Under the SEBI Act 1992 read with SEBI (Investment Advisers) Regulations, 2013 and SEBI (Portfolio Managers) Regulations, 2020 no person shall act as an Investment Advisers and Portfolio Manager unless the entity has obtained a certificate of registration from SEBI under the said Regulations. Acting as an Investment Advisers and/or Portfolio Manager without SEBI registration may entail to initiation of action, as deemed fit, under the SEBI Act 1992.
2. SEBI has observed that you are offering various financial products / services in the nature of Investment Advisory and/or Portfolio Manager in the name of **www.equitymantra.in/Equity Mantra/Naresh Pal**. In this regard, you are advised to provide the following information along with the supporting documents, if any:
 - i. Registered corporate address of **www.equitymantra.in/Equity Mantra/Naresh Pal** along with the phone numbers, email ids, legal structure (Individual/Proprietorship/Partnership/LLP/ Company etc.), PAN and date of incorporation.
 - ii. Name, address, PAN, email ids and phone numbers of Proprietor /all Promoters / Directors / Partners of **www.equitymantra.in/Equity Mantra/Naresh Pal** along with their educational qualifications, experience in activities relating to advice in relating to various financial products.

“हम हिन्दी पत्राचार का स्वागत करते हैं।”

उत्तरी प्रादेशिक कार्यालय : प्लेट-बी, आठवीं मंजिल, ऑफिस टॉवर-1, एन बी सी सी कॉम्प्लेक्स, पूर्व किदवई नगर, नई दिल्ली - 110023

Northern Regional Office : Plate-B, 8th Floor, Office Tower-1, NBCC Complex, East Kidwai Nagar, New Delhi-110023 दूरभाष (Phone) : 011 - 69012998



Continuation Sheet

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भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

- iii. With respect to point (ii) above, provide details of association of the aforesaid Proprietor / all Promoters / Directors / Partners of **www.equitymantra.in/Equity Mantra/Naresh Pal** with any other proprietorship / partnership / LLP / company/ SEBI registered Intermediary along with the nature of the association and the date of inception of such association.
- iv. Brief note on all activities / services / products offered by **www.equitymantra.in/Equity Mantra/Naresh Pal** since inception till date along with the date of commencement of the aforesaid activities/services/products.
- v. With respect to above point, provide the information year-wise since inception till date in the following format:

Sr. No.	F.Y.	Client Name	Name of the Package/Service offered	Total amount of fee charged from the client during the F.Y.	Mode of receipt of payment from Client (cash deposit/ NEFT/ Payment gateway etc.)	Details of the advise

- vi. List of all bank accounts maintained and highlight the bank accounts where advisory fees collected.
- vii. List of payment gateways, the arrangement and copy of all the documents.
- viii. Scheme details, pamphlets, brochures, promotional materials, etc., related to advisory activities.
- ix. Details of any arrangement / agreement in connection with the advisory related activities and other relevant documents available.
- x. Whether **www.equitymantra.in/Equity Mantra/Naresh Pal** ever been registered with any of the recognized Stock Exchanges / SEBI / other regulators in any capacity whatsoever? If yes, furnish the details thereof.
- xi. A copy of the audited Annual Accounts of **www.equitymantra.in/Equity Mantra/Naresh Pal** for the last three financial years.
- xii. A copy of account statement of all the bank accounts of **www.equitymantra.in/Equity Mantra/Naresh Pal** pertaining to last three financial years.



Continuation Sheet

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भारतीय प्रतिभूति
और विनिमय बोर्ड

**Securities and Exchange
Board of India**

- xiii. A copy of account statement of all the payment gateways used by **www.equitymantra.in/Equity Mantra/Naresh Pal** for receiving fees from clients for advisory/portfolio management services) from the date of operating to till date.
- xiv. Details of all the websites of **www.equitymantra.in/Equity Mantra/Naresh Pal** and entity/persons responsible for hosting and maintaining the said websites.
- xv. Any other relevant information that **www.equitymantra.in/Equity Mantra/Naresh Pal** may wish to submit.
3. You are advised to submit the aforesaid information along with supporting documents within 15 days from the date of receipt of this communication. The same information shall also be submitted through email to the undersigned.

Vinayak

email-vinayak@sebi.gov.in



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भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

By Speed Post AD / Email

39990
SEBI/NRO/OW/P/ /2021

28/12/2021

Equity Mantra
Alpha One Mall
Sarkari Vasahat Road,
Vastrapur, Ahmedabad,
Gujarat-380006

Sir,

For attention of- Prop. Equity Mantra

Sub.: Examination of products/services offered by www.equitymantra.in/Equity Mantra

1. Under the SEBI Act 1992 read with SEBI (Investment Advisers) Regulations, 2013 and SEBI (Portfolio Managers) Regulations, 2020 no person shall act as an Investment Advisers and Portfolio Manager unless the entity has obtained a certificate of registration from SEBI under the said Regulations. Acting as an Investment Advisers and/or Portfolio Manager without SEBI registration may entail to initiation of action, as deemed fit, under the SEBI Act 1992.
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“हम हिन्दी पत्राचार का स्वागत करते हैं।”



Continuation Sheet

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भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

along with their educational qualifications, experience in activities relating to advice in relating to various financial products.

- iii. With respect to point (ii) above, provide details of association of the aforesaid Proprietor / all Promoters / Directors / Partners of **www.equitymantra.in/Equity Mantra** with any other proprietorship / partnership / LLP / company/ SEBI registered Intermediary along with the nature of the association and the date of inception of such association.
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- xi. A copy of the audited Annual Accounts of **www.equitymantra.in/Equity Mantra** for the last three financial years.
- xii. A copy of account statement of all the bank accounts of **www.equitymantra.in/Equity Mantra** pertaining to last three financial years.

[Signature]



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भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

- xiii. A copy of account statement of all the payment gateways used by **www.equitymantra.in/Equity Mantra** for receiving fees from clients for advisory/portfolio management services) from the date of operating to till date.
 - xiv. Details of all the websites of **www.equitymantra.in/Equity Mantra** and entity/persons responsible for hosting and maintaining the said websites.
 - xv. Any other relevant information that **www.equitymantra.in/Equity Mantra** may wish to submit.
3. You are advised to submit the aforesaid information along with supporting documents within 15 days from the date of receipt of this communication. The same information shall also be submitted through email to the undersigned.

Vinayak

email-vinayak@sebi.gov.in