

**CONSENT ORDER IN THE ADJUDICATION PROCEEDINGS  
AGAINST M/S ALANKIT ASSIGNMENTS LTD.**

1. Securities and Exchange Board of India (hereinafter referred to as “SEBI”) has initiated adjudication proceedings against M/s Alankit Assignments Ltd. (hereinafter referred to as “the applicant”) for violation of the provisions of SEBI (Stock Brokers and Sub-brokers) Regulations, 1992 along with SEBI (Stock Brokers and Sub-brokers) Rules, 1992, SEBI Circular No. SMDRP/Policy/Cir-49/2001 dated October 22, 2001, and SEBI Circular No. SMD/SED/CIR/93/2331 dated November 18, 1993.
2. On the basis of an inspection of the applicant carried out by SEBI, it was alleged that the applicant, a member of the National Stock exchange of India (with SEBI Registration No. INB 230881235), Bombay Stock Exchange Ltd. (with SEBI Registration No. INB 010881234) and OTC Exchange of India (with SEBI Registration No. INB 200898733) dealt with unregistered sub-brokers, granted trading terminals at locations other than registered offices and registered sub-brokers’ offices, failed to segregate the clients’ funds and securities from its own funds and securities, misutilised clients’ funds and changed its shareholding pattern without prior permission of SEBI.
3. A Show Cause Notice A&E/BS/80268/2006 was issued to the applicant on November 17, 2006 requiring the applicant to show cause as to why an inquiry should not be held against it in terms of Rule 4 of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 read with Section 15I of the SEBI Act and why penalty prescribed

under Section 15HB of the SEBI Act, 1992 should not be imposed on it for the alleged violations.

4. The applicant made an application dated March 04, 2008 along with an affidavit of “undertakings / waivers” in the matter in terms of SEBI Circular no. EFD/Cir-1/2007 dated April 20, 2007 pursuant to the Show cause notice sent with Reference Number A&E/BS/80268/2006 dated November 17, 2006. Pursuant to the above application, the applicant vide letter dated June 06, 2008 proposed revised consent terms where the applicant, without admitting or denying guilt and subject to the clauses of the undertakings and the waivers, proposed to offer Rs. 2,00,000 (Rupees two lakh only) in the matter.
5. The consent terms proposed by the applicant were placed before the High Powered Advisory Committee (HPAC) and HPAC after deliberation recommended the case for settlement on payment of Rs. 2,00,000 (Rupees two lakh only) towards settlement charges.
6. In terms of the applicant's proposal for the sole purpose of settling the matter on hand and without admission or denial of guilt on the part of the applicant to the finding of fact or conclusion of law, applicant has remitted a sum of Rs. 2,00,000 (Rupees two lakh only) vide Demand Draft No. 040741 dated 27.08.2008 drawn on HDFC Bank, Fort, Mumbai, towards the terms of consent in the matter.
7. In view of the above, it is hereby ordered that:
  - i) this consent order disposes of the said adjudication proceedings initiated vide Show cause notice with Reference Number A&E/BS/80268/2006 dated November 17, 2006 against the applicant, and

- ii) passing of this order by SEBI is without prejudice to the right of SEBI to take enforcement action including commencing/reopening of the pending proceedings against the applicant, if SEBI finds that:
    - a. any representations made by the applicant in the consent proceedings are subsequently discovered to be untrue.
    - b. the applicant has breached any of the clauses / conditions of undertakings/waivers filed during the current consent proceedings.
8. This consent order is passed on this 11<sup>th</sup> of September, 2008 and shall come into force with immediate effect.

**Biju. S**

**Place: Mumbai**

**Adjudicating Officer**