

**BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA,
MUMBAI**

CONSENT ORDER

**ON THE APPLICATION SUBMITTED BY
DILIP H. BHANDARI**

**IN THE MATTER OF
WASHINGTON SOFTWARE LIMITED**

(CONSENT APPLICATION NO. 1511/2009)

1. SEBI had conducted investigations into the alleged irregularities in the trading of shares of Washington Software Ltd. (hereinafter referred to as 'the company') in three patches during the period October 18, 1999 to March 3, 2000, May 2, 2000 to June 20, 2000 and July 3, 2000 to July 25, 2000. The investigations *prima facie* revealed that Dilip H. Bhandari, a registered broker with Pune Stock Exchange having registered office at Siddharth Chamber, 1st Floor, Off No.10, 27 B, Budhwar Peth, Appa Balwant Chowk, Pune - 411002 (hereinafter referred to as 'applicant') had acted as an unregistered sub-broker while executing trades on BSE for his clients. Therefore, it was alleged that the applicant violated the provisions of Section 12 (1) of the SEBI Act, 1992, and Rule 3 of the SEBI (Stock Brokers and Sub-Brokers) Regulations, 1992 (since rescinded) read with Regulation 11 (1) SEBI (Stock Brokers and Sub-Brokers) Regulations, 1992.
2. Pursuant to the said investigations, SEBI initiated enquiry proceedings under section 11 B and 11 (4) of the SEBI Act, 1992 for the violation of provisions of Section 12 (1) of the SEBI Act, 1992, and Rule 3 of the SEBI (Stock Brokers and Sub-Brokers) Regulations, 1992 (since rescinded) read with Regulation 11 (1) SEBI (Stock Brokers and Sub-Brokers) Regulations, 1992 vide Show Cause Notice dated June 29, 2009. While the said proceeding was in progress, the applicant proposed settlement of the said proceedings vide letter dated August 27, 2009, in terms of Circular No. EFD/ED/Cir-1/2007 dated April 20, 2007. The applicant proposed revised consent terms vide letter dated February 4, 2010 whereby the applicant undertook to pay Rs. 1,00,000/-

(Rupees One Lakh only) towards settlement charges. The consent terms proposed by the applicant were placed before the High Powered Advisory Committee which, after deliberations, recommended that the case may be settled on the terms proposed by the applicant. SEBI accepted the said recommendations and communicated the same to the applicant vide letter dated April 16, 2010.

3. For the sole purpose of settling the said enquiry proceedings and without admitting or denying guilt, the applicant has remitted a sum of Rs. 1,00,000/- (Rupees One Lakh only) vide Demand Draft No. 058586 dated April 26, 2010 drawn on Axis Bank Ltd. payable at Mumbai.
4. In view of the above, it is hereby ordered that this consent order disposes of the said enquiry proceedings pending against the applicant in the matter.
5. This order is without prejudice to the right of SEBI to initiate enforcement actions, including commencing or reopening of the proceedings pending against the applicant, if:
 - a. any representation made by the applicant in this consent proceeding is subsequently discovered to be untrue; or
 - b. the applicant breaches any of the consent terms or undertakings filed in this consent proceeding.
6. This consent order is passed on this day, the 2nd of June 2010.

K. M. ABRAHAM
WHOLE TIME MEMBER

PRASHANT SARAN
WHOLE TIME MEMBER