

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA

SETTLEMENT ORDER

On the Application No. 3201 of 2016

Submitted by **Giza Estaes Pvt. Limited [PAN: AADCG2568B]** along with PAC's **Ms. Devaki Nandan Lohati [PAN: ABXPL0990Q]**, **Ms. Manju Lahoti [PAN: ABDPL7348A]**, **Mr. Gauri Shankar Bajaj [PAN: AADPB0640A]**, **Mr. Rinkesh Omprakash Lahoti [PAN: ACWPL4369F]**

In the matter of Sangam Advisors Limited

1. Giza Estaes Pvt. Limited. having its office at 17/19, Naviwadi, Nand Bhawan, Ground Floor, Dadiseth Agiary Lane, Mumbai – 400002, along with persons acting in concert (PACs) with it namely, Ms. Devaki Nandan Lohati, Ms. Manju Lahoti, Mr. Gauri Shankar Bajaj, Mr. Rinkesh Omprakash Lahoti (hereinafter referred to as ‘applicant’), vide its letter received by SEBI on December 22, 2016, filed an application in terms of the SEBI (Settlement of Administrative and Civil Proceedings) Regulations, 2014 (‘Settlement Regulations’) proposing to settle, without admitting or denying the findings of fact and conclusions of law, through a settlement order, the proposed adjudication proceedings intimated vide Notice of Approved Enforcement Action dated October 28, 2016 for the delay in making annual disclosure of shareholding in the scrip of Sangam Advisors Limited as required under regulation 30(2) read with 30(3) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (‘SAST Regulations’).
2. The authorised representatives of the applicant had a meeting with the Internal Committee of SEBI on February 09, 2017, wherein the settlement terms were deliberated. Thereafter, the applicant vide letter dated February 10, 2017, proposed the revised settlement terms to settle the defaults mentioned in para 1 above.
3. The High Powered Advisory Committee (‘HPAC’) in its meeting dated February 27, 2017 considered the settlement terms proposed by the applicant and recommended the case for settlement upon payment of ₹2,00,000/- (Rupees Two Lakh only) by the applicant towards settlement terms for the aforementioned defaults. The Panel of

Whole Time Members of SEBI had accepted the said recommendations of the HPAC and the same was communicated to the applicant vide e-mail dated March 21, 2017.

4. The applicant vide Demand Draft no. 335974 dated March 24, 2017, drawn on Karur Vysya Bank, payable at Mumbai has remitted a sum of ₹2,00,000/- (Rupees Two Lakh only) towards the settlement charges.
5. Accordingly, the adjudication proceedings proposed to be initiated against the applicant for the alleged violation as discussed in paragraph 1 above, are settled *qua* the applicant as per the above terms, by way of this order and SEBI shall not initiate any enforcement action against the applicant for the said defaults.
6. In view of the above, in terms of Regulation 15 and 19 of the Settlement Regulations, it is hereby ordered that:
 - i. this order disposes of the said proposed adjudication proceedings in respect of the applicant as mentioned above and;
 - ii. passing of this order is without prejudice to the right of SEBI to take enforcement actions including commencing proceedings against the applicant, if SEBI finds that:
 - a. any representations made by the applicant in the present settlement proceedings are subsequently discovered to be untrue;
 - b. the applicant has breached any of the clauses/ conditions of undertakings/ waivers filed during the present settlement proceedings.
7. This settlement order passed on this 10th day of April, 2017 shall come into force with immediate effect.
8. In terms of Regulation 17 of the Settlement Regulations, a copy of this order shall be sent to the applicant and shall also be published on the website of SEBI.

-Sd-

G. MAHALINGAM
WHOLE TIME MEMBER

-Sd-

S. RAMAN
WHOLE TIME MEMBER