



**BY REGD. POST**

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

**Central Public Information Officer**  
Email: [cpio\\_ho@sebi.gov.in](mailto:cpio_ho@sebi.gov.in)

CPIO/NR/CIC-652659/2021-22/11716/2  
Dated 07.06.2021

**Smt.S. Lekshmi Devi & Shri G.R. Pillai,**  
Thannickal, T.P. North,  
Mannarasala (PO), Haripad  
Kerala – 690 514

Madam/Sir,

**Sub: Information sought under Right to Information Act, 2005 (RTI Act) – CIC  
Compliance – Order dated 24.05.2021.**

This has reference to the captioned CIC Order No. CIC/SEBIH/A/2019/652689 dated 24.05.2021.

In this regard, you may note that SEBI has informed you vide letter dated 28.07.1997 that the matter has been taken up with the company and have suggested them to write to you directly under advice to us.

Further, SEBI has also written to you vide reference letter No. IGG/CONF/NRO/94-98/00026115 (Complaint Reference No. 0029482) in March, 1999 that if your complaint still remains unresolved, please indicate the same in the remarks column and if no reply is received from you by 15<sup>th</sup> May, 1999, it shall be presumed that your complaint stands resolved and no further action is required at our end.

However, it may be noted that in response to your SCORES complaints No. SEBIP/DH12/0000973/1 dated 29.10.2012 (Action Taken Report enclosed), it was informed that the said company M/s Mahadev Corporation (India) Ltd. has been delisted from the Stock Exchange(s) and SEBI would not be able to proceed further in the matter. It was also suggested that the matter may be taken up with Ministry of Corporate Affairs for resolving your complaint.

Yours sincerely,

**Santosh Kumar Sharma**

Encl.: As above.

### Complaint Details

Registration No	SEBIP/DH12/0000973/1
Name	S LEKSHMI DEVI & G R PILLAI
Address	THANNICKAL THULAMPARAMPU NORTH
City/Location	MANNARASLA
Pincode	690514
PAN No	--
State	Kerala
Date of Receipt	2012-10-29
Letter Date	2012-10-22
SEBI Inward Number	81894
Category Assigned	Refund/Allotment/ Dividend/Transfer/ Bonus/Rights/ Redemption/Interest
Nature of Complaint	Non-receipt of shares after Transfer
Complaint Against	Mahadev Corporation (India) Ltd
Company Name	Mahadev Corporation (India) Ltd
VIP Reference	MoF
Complaint Details	For necessary action
Attached Document	View Attachment

### Action History

Registration No: SEBIP/DH12/0000973/1

As on:04/06/2021

S.No.	Action	Date of Action	Remarks	From	To	Lodged by
1	RECEIVED THE COMPLAINT	30 Oct 2012	--	INVESTOR	OIAE-NRO	INVESTOR
2	FORWARD TO DEALING OFFICER	30 Oct 2012	Forwarded to Dealing Officer	OIAE-NRO	OIAE-NRO - DO	--

S.No.	Action	Date of Action	Remarks	From	To	Lodged by
3	INITIATE REGULATORY ACTION	12 Feb 2014	Action has been taken against the company for non-redressal of the investor grievances.	OIAE-NRO - DO	OIAE-NRO - DO	--
4	REMINDER RECEIVED FROM INVESTOR	20 Jan 2015	REMINDER AS ON 20.01.2015	INVESTOR	OIAE-NRO - DO	View Details
5	REMINDER RECEIVED FROM INVESTOR	18 Apr 2016	Reminder as on 18/04/2016	INVESTOR	OIAE-NRO - DO	View Details
6	INTERNAL REMARKS	28 Sep 2016	Company status is Delisted, as per OIAE-HO email dated 26.09.2016.	OIAE-NRO - DO	OIAE-NRO - DO	--
7	CASE DISPOSE OF	28 Sep 2016	In this regard, please note that the cited company has been delisted from the Stock Exchange(s) and SEBI would not be able to proceed further in the matter. It is suggested that you may like to approach Ministry of Corporate Affairs in respect of your complaint.	OIAE-NRO - DO	INVESTOR	View Final Status

**SECURITIES AND EXCHANGE BOARD OF INDIA  
OIAE-IGRD-NRO**

**Sub: RTI hearing dt. 24/5/2021 - M/s. Mahadev Corp. India Ltd., New Delhi – CIC order dated 24.05.2021**


RTI cell, HO vide email dated 01.06.2021 forwarded CIC order dated 24.05.2021 to NRO for providing the information in the matter. (FLAG-A)

In this regard, information/comments are as below:

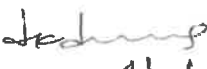
1. It is observed from the SEBI letter dated 25/07/97 to Sh G R Pillai (annexures P1 and P2 – provided by the appellant) with complaint reference no. 0029482 that SEBI had taken up his complaint with the company Mahadev Corp. India Ltd and had suggested to write to the complainant directly under advice to SEBI. The appellant has indicated in his submission at hearing before CIC that the said letter is with respect to the complaint dated 02/05/1997.
2. Subsequently, SEBI letter (annexures P3 and P4 – provided by the appellant) citing the same complaint reference no. was issued to Sh G R Pillai in 1999 wherein Sh G R Pillai was advised by SEBI that if the complaint has been resolved the same may be confirmed by reply paid post card attached to the SEBI letter. Further, in case the complaint is unresolved the same may be indicated in the remarks column (of the attached post card) and also if no reply was received by 15th May 1999, the complaint would be presumed to be resolved and no further action would be required by SEBI. However, complainant has not attached copy of the said reply in case the complainant had replied to the SEBI letter. Further, since the matter is more than 20 years old, the said reply, if any, and other records pertaining to the complaint are not traceable.
3. The complainant/appellant vide letter dated 22/10/2012 complained that no resolution was provided to his complaint to SEBI during 1997. The copy of the earlier complaint of 1997 was also attached. This complaint was processed through SCORES (Reg. no. SEBI/P/DH12/0000973/1). The information regarding the same was provided to the appellant in reply to his RTI application dated 7/5/2019. (File - B & C)


If approved the above information/comments may be forwarded to office of CPIO.

Submitted please

  
Nanu Kaur  
AGM  
May 4, 2021

DGM (Shri Ashish Kumar)   
4/6/21

RD (Shri Sharad K. Sharma)   
4/6/21

DGM (Ashish)   
आशीष  
4/6/21

CPIO-HO.

केन्द्रीय सूचना आयोग  
Central Information Commission  
बाबा गंगनाथ मार्ग, मुनिरका  
Baba Gangnath Marg, Munirka  
नई दिल्ली, New Delhi – 110067

द्वितीय अपील संख्या / Second Appeal No. CIC/SEBIH/A/2019/652689

Ms. S. Lakshmi Devi

... अपीलकर्ता/Appellant

VERSUS

बनाम

CPIO

... प्रतिवादी /Respondent

Securities and Exchange Board of  
India, SEBI Bhawan, Plot No. C-  
4A, G-Block, Bandra Kurla  
Complex, Bandra (East),  
Mumbai-400051

Relevant dates emerging from the appeal:

RTI : 07-05-2019	FA : 20-06-2019	SA : 04-10-2019
CPIO : 06-06-2019	FAO : 23-07-2019	Hearing : 24-05-2021

**ORDER**

1. The appellant filed an application under the Right to Information Act, 2005 (RTI Act) before the Central Public Information Officer (CPIO), Securities and Exchange Board of India, Mumbai. The appellant seeking information on seven points, including, inter-alia:-

- (i) "The date and action taken by above said company on my lodging the original shares along with complete TDs dated 22nd of November 1996 which had been receipted by the Company on 27th of November 1996 (as per acknowledgement signed and received back). I would like to know why these shares were not transferred or rejected and returned to me as would have;
- (ii) Why no action has initiated by SEBI Mumbai on my registered AD complaint dated 2nd of May 1997 with a copy to the concerned company at New Delhi, etc."

2. As the CPIO had not provided the requested information, the appellant filed the first appeal dated 20.06.2019 requesting that the information should be provided to him. The first appellate authority was ordered on 23.07.2019 and disposed of his first appeal. He filed a second appeal u/Section 19(3) of the RTI Act before the Commission on the ground that information has not been provided to him and requested the Commission to direct the respondent to provide complete and correct information.

**Hearing:**

3. The appellant was represented through her husband Shri G R Pillai who attended the hearing through audio-call. The respondent, Shri Santosh Sharma, CPIO and Ms. Pramila Sridhar attended the hearing through audio-call.

4. The written submissions of the respondent are taken on record.

5. The representative of the appellant submitted that till date complete and correct information has not been provided to the appellant by the respondent on her RTI application dated 07.05.2019. The representative of the complainant submitted that no information relating to letter dated 02.05.1997 has been provided to the appellant.

6. The respondent submitted that vide their letters dated 06.06.2019 and 23.07.2019, point-wise reply/information, as per the documents available on record has been provided to the appellant. The respondent submitted that they have not received letter dated 02.05.1997 in their office. On this, the representative of the appellant submitted that he is having the acknowledgment number/proof vide which his letter dated 02.05.1997 was duly delivered with respondent public authority.

**Decision:**

7. The Commission, after hearing the submissions of both the parties and after perusal of records, observes that the appellant was aggrieved that complete information relating to her letter dated 02.05.1997 has not been provided to her by the respondent as sought by her in her RTI application. The appellant further contested that she is having the acknowledgment number/proof of delivery of the said letter with respondent public authority. In view of this, the Commission advised the appellant to upload a copy of the acknowledgment of representation dated 02.05.1997 on the Commission's portal and also send a copy of the said acknowledgment to the respondent, within a period of 15 days from the date of receipt of this order. The respondent is directed to give information to the appellant within 15 days after receipt of acknowledgment from the appellant.

8. With the above observations, the appeal is disposed of.
9. Copy of the decision be provided free of cost to the parties.

**Neeraj Kumar Gupta (नीरज कुमार गुप्ता)**  
**Information Commissioner (सूचना आयुक्त)**

दिनांक / Date : 24-05-2021

Authenticated true copy  
(अभिप्रमाणित सत्यापित प्रति)

S. C. Sharma (एस. सी. शर्मा),  
Dy. Registrar (उप-पंजीयक),  
(011-26105682)



Addresses of the parties:

1. CPIO  
Securities and Exchange Board of India,  
SEBI Bhawan, Plot No. C-4A, G-Block,  
Bandra Kurla Complex, Bandra (East),  
Mumbai-400051
2. Ms. S. Lakshmi Devi

Shri Sunil Kadam,  
Regional Director  
Securities Exchange Board of India  
Northern Regional Office, Delhi  
5th Floor, Bank of Baroda Building  
16, Sansad Marg  
New Delhi - 110 001

REG AD

*Y.M. (10/10/19)*

40656

Subject: Request for information under the RTI Act 2005 amended up to date

Reference: My complaint to MCA acknowledged under J00026359 dated 30<sup>th</sup> of December 2017 and SEBI complaint registration no: SEBIP/DHI4/0000015/1 dated 09/01/2014 and Prime Minister's office direction no: PMO ID NO:PMO/PMP/14/00071595 dated 8<sup>th</sup> January 2015 to Secy DEA, M/O Finance and various other correspondence to various officials including SEBI, ROC etc etc... regarding non transfer of 500 shares of M/S Mahadev Corporation India Ltd. A-62, 11 floor, Rajouri garden, New Delhi-110027. against Folio No: 7299 under Certificate No: 5338 to 5342.

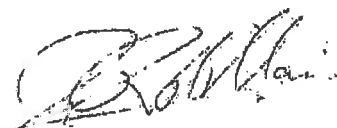
Dear sir,

I shall feel obliged if you make necessary arrangements to provide me answers for the following questions at an early date in details.

1. The date and action taken by above said company on my lodging the original shares along with complete TDs dated 22<sup>nd</sup> of November 1996 which had been receipted by the Company on 27<sup>th</sup> of November 1996 (as per acknowledgement signed and received back). I would like to know why these shares were not transferred or rejected and returned to me as would have.
2. Why no action has initiated by SEBI Mumbai on my registered AD complaint dated 2<sup>nd</sup> of May 1997 with a copy to the concerned company at New Delhi.
3. Why my complaint to ROC at New Delhi with copy to SEBI Mumbai and company on 21<sup>st</sup> of Jun 1997 was not looked in to and acted up on.
4. What was the reason behind keeping quiet on such a serious matter by the respective authorities and what were the actions initiated by any one of them and the result of such an action so far generated.
5. What was the action initiated by any of the entity on my complaint and the details of any such action also be intimated chronological wise.
6. From the correspondence from MCA we understand the company had been penalised to the maximum tune of rupees 1 crore for the established and proved miscreants done, on 2<sup>nd</sup> of January 2015. However this could not be extracted from the company and the cause shown by the authorities is that this entity is not traceable and they are trying to trace them through the help of utility organisations. Why such a poor development was waited for though my complaint stand since 1997. Why such a long delay occurred at whose instance.
7. What was the action generated on Prime Minister's direction to Secy DEA and the action originated in the matter may kindly be exposed to us.

An Indian Postal Order bearing number 46F803013 of date payable to CAPIO, NRO, SEBI at New Delhi for Rs. 10 is enclosed being the fee for your further necessary action.

Haripad  
07-05-2019



S. Lekshmi Devi & G.R. Pillai  
Thannickal, T.P north  
Mannarasala (P.O)

Haripad-690514

Mob. 9492461841

Email: GARAMANPILLAI @ VIMPAI. COM





By Regd. Post AD

भारतीय प्रतिभूति  
और विनिमय बोर्ड  
Securities and Exchange  
Board of India

Central Public Information Officer  
Email: cpio\_ho@sebi.gov.in

CPIOGPG/LD/724-2019/14159  
June 6, 2019

Smt. S. Lekshmi Devi & Shri G. R. Pillai  
Thannickal,  
T.P North  
Mannarasala (P.O),  
Haripad – 690514  
(M) : 9497461841

Madam/Sir,

**Sub: Information sought under Right to Information Act, 2005 (RTI Act)**

This has reference to your RTI application dated May 07, 2019, received from you by SEBI – Northern Regional Office on May 13, 2019, in terms of RTI Act, 2005. Our reply is as under:

**Reply to query 1,4,5 & 6 :**

The query raised by the you is with regard to the complaint submitted with the company and ROC, New Delhi. However, SEBI follows the SCORES mechanism for redressal of complaint. The complaint was received by SEBI in the Year 2012, 2013 and 2014 and was uploaded on SCORES bearing SCORES registration nos SEBIP/DH12/0000973/1, SEBIP/DH12/0000991/1 & SEBIP/DH12/0000015/1 respectively (copies of ATR of the same are enclosed herewith). The complaints were disposed off with the remarks "that the cited company has been delisted from the Stock Exchange(s) and SEBI would not be able to proceed further in the matter. It is suggested that you may like to approach Ministry of Corporate Affairs in respect of your complaint".

**Reply to query 2 & 3 :**

You are informed that as per the records in SCORES, you had forwarded the complaint of May 02, 1997 along with the letter on 22<sup>nd</sup> October, 2012 seeking resolution on the complaint. This complaint bearing SCORES registration no. SEBIP/DH12/0000973/1 was uploaded on SCORES on 29<sup>th</sup> October, 2012 by SEBI, Mumbai Office (copy of the ATR is enclosed herewith).

..2

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बान्द्रा कुर्ला कॉम्प्लेक्स, बान्द्रा (पूर्व), मुंबई - 400 051.  
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर. एस.), 2644 9000 / 4045 9000 फेक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in

SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051.  
Tel.: 2644 9950 / 4045 9950 (IVRS), 2644 9000 / 4045 9000 Fax: 2644 9019 to 2644 9022 Web: www.sebi.gov.in

..2..

**Reply to query 7 :**

The query does not pertain to SEBI.

In case you are not satisfied with the reply, you may appeal to **First Appellate Authority –Shri Anand Rajeshwar Baiwar, Executive Director SEBI, SEBI Bhavan, Plot No. C-4A, G Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051** or [appellateauthority@sebi.gov.in](mailto:appellateauthority@sebi.gov.in) within thirty days of the receipt of this letter.

Yours faithfully,

  
G. P. Garg

**Encl. : as above.**

(Please file RTI application online at <https://rtionline.gov.in>, which enables you to receive the reply as well as file an appeal online).

**BEFORE THE APPELLATE AUTHORITY  
(Under the Right to Information Act, 2005)  
SECURITIES AND EXCHANGE BOARD OF INDIA**

Appeal No. 3493 of 2019

Ms. S. Lekshmi Devi and Mr. G.R. Pillai	:	Appellant
Vs.		
CPIO, SEBI, Mumbai	:	Respondent

**ORDER**

1. The appellant filed an application dated May 7, 2019 (received on May 13, 2019), under the Right to Information Act, 2005 (“RTI Act”). The respondent, by letter dated June 6, 2019, responded to the appellant. The appellant filed this appeal dated June 20, 2019 against the said response dated June 6, 2019. I have carefully considered the application, the responses and the Appeal and find that the matter can be decided based on the material available on record.
2. From the appeal, I note that the appellant is aggrieved by the respondent’s response to his application.
3. **Queries in the application** – The appellant sought the following information relating to non-transfer of 500 shares of M/s Mahadev Corporation India Limited-
  1. *The date and action taken by above said company on my lodging the original shares along with complete TDs dated 22nd of November 1996 which had been receipted by the Company on 27th of November 1996 (as per acknowledgement signed and received back). I would like to know why these share were not transferred or rejected and returned to me as would have.*
  2. *Why no action has initiated by SEBI Mumbai on my registered AD complaint dated 2nd of May 1997 with a copy to the concerned company at New Delhi.*
  3. *Why my complaint to ROC at New Delhi with copy to SEBI Mumbai and company on 21st of Jun 1997 was not looked in to and acted up on.*

4. *What was the reason behind keeping quiet on such a serious matter by the respective authorities and what were the actions initiated by any one of them and the result of such an action so far generated.*
5. *What was the action initiated by any of the entity on my complaint and the details of any such action also be intimated chronological wise.*
6. *From the correspondence from MCA we understand the company has been penalised to the maximum fine of rupees 1 crore for the established and proved miscreants done, on 2nd of January 2015. However this could not be extracted from the company and the cause shown by the authorities is that this entity is not traceable and they are trying to trace them through the help of utility organisations. Why such a poor development was waited for though my complaint stand since 1997. Why such a long delay occurred at whose instance.*
7. *What was the action generated on Prime Minister's direction to Secy DEA and the action originated in the matter may kindly be exposed to us.*

4. In response to query 1, 4, 5 and 6, the respondent informed that the complaints were received by SEBI in the Year 2012, 2013 and 2014, and were uploaded on SEBI Complaints redress System (SCORES) mechanism bearing complaint numbers SEBIP/DH12/0000973/1, SEBIP/DH12/0000991/1 and SEBIP/DH12/0000015/1, and were disposed of with the remarks "*that the cited company has been delisted from the Stock Exchange(s) and SEBI would not be able to proceed further in the matter. It is suggested that you may like to approach Ministry of Corporate Affairs in respect of your complaint*". In response to query 2 and 3, the respondent informed that as per the records in SCORES, the appellant had forwarded the complaint of May 02, 1997 along with the letter on 22<sup>nd</sup> October, 2012, and the same was uploaded on SCORES on 29<sup>th</sup> October, 2012 by SEBI, Mumbai Office. It was informed that query No. 7 does not pertain to SEBI.

5. **Grounds of Appeal** – The appellant submitted that the respondent did not provide information with respect to the points raised by the appellant and reiterated the request for information contained in the above query. As regards query number 1, the appellant stated that he requested for action taken by the company in the matter, which was not disclosed in the response. On query numbers 2 to 6, the appellant reiterated that his request was to know about the actions taken by the Company/SEBI/ RoC and the reason why no proper action was taken in the matter. On query number 7, the appellant requested for the present status

of the reference of Prime Minister's Office to the Secretary of Economic Affairs with supporting evidence.

6. The queries of the appellant, the responses and the submissions made in the appeal are considered in the following paragraphs.
7. **Query Nos. 1, 4, 5 and 6-** I note that the appellant had requested for the action taken by the company in respect of the request for transfer of shares, reasons for keeping the matter for a long time by SEBI, actions initiated by any of the entities on the complaint of the appellant and the reasons for the delay and "poor development" in the matter. In response, the respondent has informed that the complaints were received by SEBI in 2012, 2013 and 2014 and provided the Action Taken Report (ATR) of the said complaints. The ATRs reveal the correspondence made during processing of the said complaints. Therefore, the requested information, insofar as it relates to the action taken by SEBI in the matter are explicit. The action taken by the company/ RoC cannot be deemed to be information available with the respondent. I also note that the respondent has specifically informed that the company has been delisted from the stock exchanges.
8. I find that the appellant in query numbers 4 and 6 also sought reasons for the delay on part of the respective authorities and the reasons for the 'poor developments' in the matter. As held by the Hon'ble High Court of Bombay in *Dr. Celsa Pinto, Ex-Officio Joint Secretary (School Education) vs. the Goa State Information Commission* on 3 April, 2008 (2008 (110) Bom L R 1238), an applicant can seek information available on record of the public authority under the RTI Act, but cannot seek reasons and justifications for its actions under the guise of seeking information. Therefore, I do not find any deficiency in the response.
9. **Query Nos. 2 and 3-** The appellant requested for the reasons why action has not been taken by SEBI on the complaint dated May 2, 1997 and the reasons why his complaint to RoC which was copied to SEBI was not acted upon. The appellant has submitted that the query number 2 was to expose the action taken by SEBI in the matter. However, I note that the complaint dated May 2, 1997 was sent to SEBI along with letter dated October 22, 2012 and was taken up through SCORES as complaint no. SEBI/P/DH12/0000973/1. The ATR of the said complaint was provided by the respondent, which reveals the actions taken by SEBI. As observed hereinabove, the respondent cannot be expected to have information regarding

action taken by RoC or the company in respect of the complaints filed by the appellant with them. Further, as observed above, the appellant cannot seek reasons and justifications for any action taken or not taken by a public authority under the RTI Act, under the guise of seeking information. Accordingly, no deficiency is observed in the response.

10. **Query No. 7-** The appellant had requested information with respect to action taken on Prime Minister's direction to Department of Economic Affairs, which was observed by the respondent as not pertaining to SEBI. I find no reason to disbelieve the observation of the respondent. Accordingly, I do not find any fault with the response.
11. In view of the above observations, no deficiency is observed in the response warranting interference at the appellate stage. The appeal is accordingly dismissed.

**Place:** Mumbai  
**Date:** July 22, 2019

**ANAND BAIWAR**  
**APPELLATE AUTHORITY UNDER THE RTI ACT**  
**SECURITIES AND EXCHANGE BOARD OF INDIA**

## RTI hearing dt. 24/5/2021 = M/s. Mahadev Corpn. Ltd., New Delhi

BEFORE THE CENTRAL INFORMATION COMMISSION.

HEARING NOTE FOR APPEAL No. CIC/SEBIH/A/2019/652689 ON 24/05/2021 by S. Lekshmi Devi v/s. CPIO, SEBI.

We, S. Lekshmi Devi and G.R.Pillai sought certain information from The PIO, SEBI, Mumbai and further resulted into Ist and IInd appeals and the hearing scheduled for 25th May 2021 and submit as under:--

We bought 500 shares of M/s. Mahadev Corpn. Ltd through NSE and lodged them along with original TDs and had been receipted by the company on 27th November 1996 as per signed postal AD received back. Since we were not getting the Shares back duly transferred in time we lodged a complaint on 2nd May 1997 through SEBI which had been received by them as per AD received back. However, having failed to get back the shares we made another Regd. AD complaint to Registrar of Companies at New Delhi with copy to SEBI on 21/6/1997 which were received by them. Copies attached P-1 to P8.

2. Then we made number of complaints through SCORES and by Regd. AD letters but nothing happened so far which forced us to approach your honour. The reply given by information Officer do not show the correct fact as stated the original first compliant was to SEBI stand acknowledged as per copy of P1 On 25/07/97 and then on 7/4/99 P2. Hence it is clear that complaint originated in 1997 and SEBI officials were not acting in accordance with SEBI Act and Rules.

3. It may also be noted The Registrar of Companies also have not yet acted as dictated by Cmpnies Act and resolved the complaint registered.

4. We had provided the copies in proof of our earlier complaints to SEBI in 2012 and number of times in scores as acknowledged by them. There never had any action report revealed to us. Hence may be rejected in toto and directed suitable action. The stated ATR do not reveal any action taken by any authorities.

5. The SEBI Act 1992 is made for the protection of individual investors and the complaints received should be resolved through appropriate speedy channels by which individual poor investor's interest is protected at shortest and with minimum efforts and cost burden to the investors, resolved and compensated whereas in this case kept quiet and ruined the chances of recovery as is evidenced.

6. It may be noted that the Honble Prime Minister of India directed the Authorities through DEA to take suitable action and resolve the complaint which too were ignored for extraneous reasons.

7. Though in the appeal order 3493 of 2019 under para 2 it was admitted the appellant is aggrieved but did not give any relief. The fact ROC and SEBI was directed had been ignored which is against interest of public at large which the commission may look suitably and remedied.

8. We may be allowed to submit SEBI had been created with the sole intention of protecting Indian Capital Markets with wider responsibilities and powers which ultimately look after and protect the interest of poor investors against the atrocities which the Corporate may be exerted on the individual investors at the receiving end.

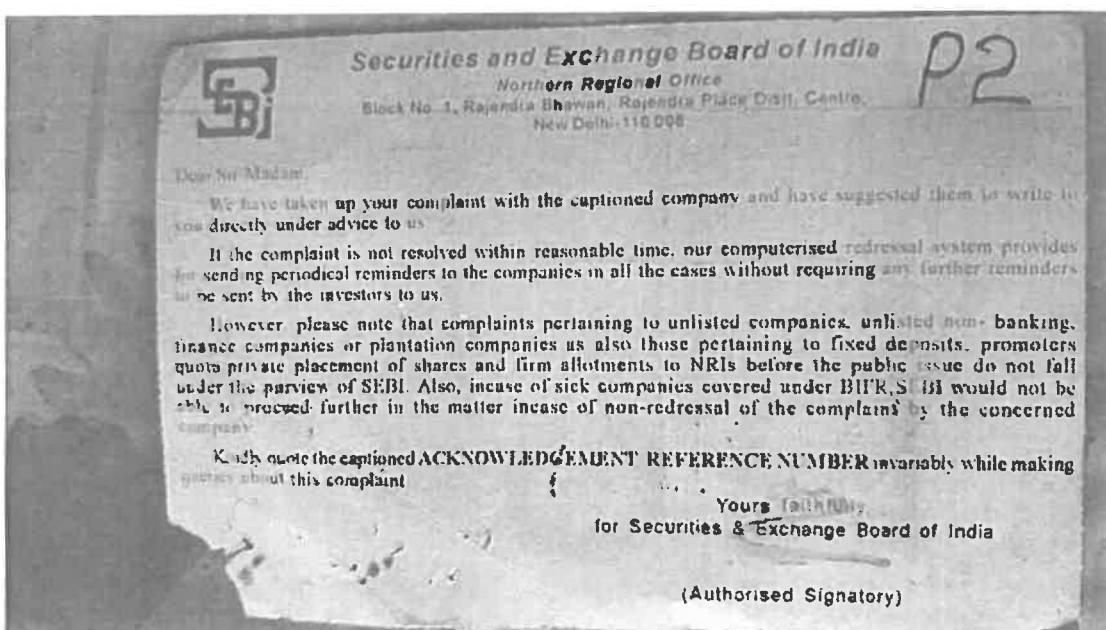
9. Under the circumstances Commission may look into the matter with wider perspective and suitably remedies the maladies keeping justice and equities.

Dated at Haripad the 25th day of May 2021.

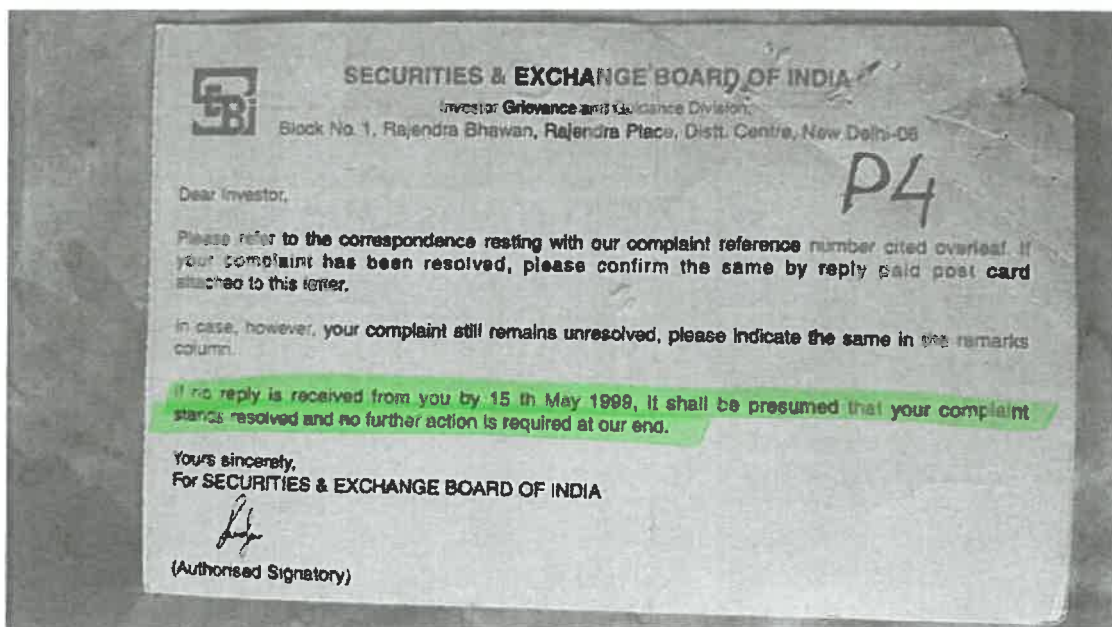
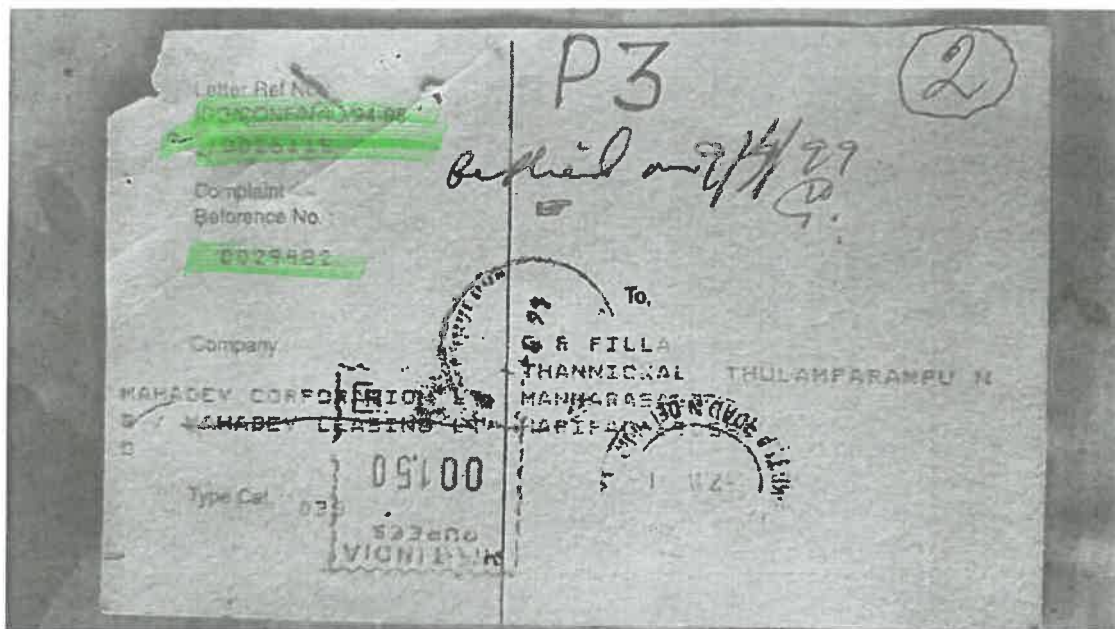
S. LEKSHMI DEVI & G.R. PILLAI



P1 &  
P2



P3 & P4



P5

प्राप्ति स्वीकृति (रसीद) ACKNOWLEDGEMENT

एक रजिस्ट्री/पत्रिका/पत्र/पोस्टकार्ड/पैकेट/पार्सल प्राप्त हुआ

Received a Registered Letter/Postcard/Packet/Parcel  
 Insured  
 Amount रु 1375  
 Addressed to (नाम) Dr. R. Pillai  
Thannickal  
Malappuram District  
Malabar Road  
170002  
 Date of delivery ..... 199  
 Signature of addressee  
 Score sur the matter not required.  
 For insured articles only.

P6

भारत पोस्ट-54  
भारत पोस्ट-54  
R.P.-54

भारतीय डाक विभाग  
DEPARTMENT OF POSTS, INDIA

भारतीय डाक  
भारत की डाक

भारतीय डाक विभाग/भारत की डाक/भारत की डाक  
Name-stamp of office of posting

[Empty box for name-stamp]



भारतीय डाक विभाग/भारत की डाक/भारत की डाक  
Sender's address

R. PILLAI  
THANNICKAL  
Malappuram District  
Malabar Road  
170002

भारतीय डाक विभाग/भारत की डाक/भारत की डाक  
140197-75 P 91(114)-31-10 91-4,23,000 Bk

P7 3

भारतीय डाक विभाग  
DEPARTMENT OF POSTS, INDIA  
प्राप्ति स्वीकृति/ACKNOWLEDGEMENT

पंजीकृत-पत्र/पार्सल प्राप्त हुआ  
Received Registered Letter/Parcel

पत्रिका/No. \_\_\_\_\_ तारीख/Dated 6/10/68 को/for \_\_\_\_\_

बोले का मूल्य रुपये में \_\_\_\_\_  
\*Insured for Rupees The Securities Corporation Board of India

→ वाले Mittal Misal, B wing, 2/24, Naraina  
→ वाले Point, New Delhi 110001

1205

हस्ताक्षर और नाम \_\_\_\_\_  
Date stamp of office of delivery

P8

On Postal Service

\_\_\_\_\_

प्रेमक डाकघर की नाम-पतेवर  
Name: stamp of office of post

S. Leekshmi Devi  
Tharickal  
Thalampuzha P.O., Thalipattur  
पिन/PIN 690550  
PH: 0479-2412141

**Complaint Details**

Registration No	SEBIP/DH12/0000973/1
Name	S LEKSHMI DEVI & G R PILLAI
Address	THANNICKAL THULAMPARAMPU NORTH
City/Location	MANNARASLA
Pincode	690514
PAN No	--
State	Kerala
Date of Receipt	2012-10-29
Letter Date	2012-10-22
SEBI Inward Number	81894
Category Assigned	Refund/Allotment/ Dividend/Transfer/ Bonus/Rights/ Redemption/Interest
Nature of Complaint	Non-receipt of shares after Transfer
Complaint Against	Mahadev Corporation (India) Ltd
Company Name	Mahadev Corporation (India) Ltd
VIP Reference	MoF
Complaint Details	For necessary action
Attached Document	View Attachment

**Action History**

Registration No: SEBIP/DH12/0000973/1

No:

As on:04/06/2021

S.No.	Action	Date of Action	Remarks	From	To	Lodged by
1	RECEIVED THE COMPLAINT	30 Oct 2012	--	INVESTOR	OIAE-NRO	INVESTOR
2	FORWARD TO DEALING OFFICER	30 Oct 2012	Forwarded to Dealing Officer	OIAE-NRO	OIAE-NRO - DO	--

S.No.	Action	Date of Action	Remarks	From	To	Lodged by
3	INITIATE REGULATORY ACTION	12 Feb 2014	Action has been taken against the company for non-redressal of the investor grievances.	OIAE-NRO - DO	OIAE-NRO - DO	--
4	REMINDER RECEIVED FROM INVESTOR	20 Jan 2015	REMINDER AS ON 20.01.2015	INVESTOR	OIAE-NRO - DO	View Details
5	REMINDER RECEIVED FROM INVESTOR	18 Apr 2016	Reminder as on 18/04/2016	INVESTOR	OIAE-NRO - DO	View Details
6	INTERNAL REMARKS	28 Sep 2016	Company status is Delisted, as per OIAE-HO email dated 26.09.2016.	OIAE-NRO - DO	OIAE-NRO - DO	--
7	CASE DISPOSE OF	28 Sep 2016	In this regard, please note that the cited company has been delisted from the Stock Exchange(s) and SEBI would not be able to proceed further in the matter. It is suggested that you may like to approach Ministry of Corporate Affairs in respect of your complaint.	OIAE-NRO - DO	INVESTOR	View Final Status

OK

A137

29/10

F/B

P/B

The SEBI,  
Investor Service Cell,  
SEBI Bhavan, Plot No. C4-A,  
G Block, Bandra Kurla Complex,  
Bandra (East), Mumbai-400051.

क्र. प्र. वि. नं. SEBI
सं/No 81899
दिनांक
Date: 20 OCT 2012

22nd Oct 2012

Sub: Complaint pending regarding non transfer and receipt of shares from MAHADEV CORPN (I) LTD,  
Share Dept A-62, 11 Floor, Rajouri Garden, New Delhi-110027.

Ref: My complaint to SEBI dated 2nd May 1998

Your Acknowledgement No: 9707/0029482 dated 25/07/97

Sir,

I had made a complaint to your office during 1997 stating that The Mahadev corpn (I) Ltd., New Delhi did not have transferred my shares lodged under valid TD and along with the original Certificate. Though your office acknowledged the complaint so far no resolution has been provide to me by the Company of SEBI.

I have attached herewith various documents copies to enable you to verify the matter and take necessary further action.

I now request you to kindly take immediate steps to mitigate my grievances at the earliest.

Looking forward to hear from you at the earliest

Encl:as above

Yours faithfully,

S LEKSHMI DEVI & G R PILLAI,  
Thannickal, Thulamparampu North,  
MANNARASLA P O : 690514

बीमा नहीं/NOT INSURED

कम्पनी पर टिकट का मूल्य

Amount of Stamp affixed

एक सिद्धि

Received & Registered

पानेवाले का नाम

Addressed to

Rs. 17

Result of Company  
Delhi High Court  
New Delhi 110053

श्रीवत्स

1375

LOCAL,  
NORTH,  
(O.), HARIPAD:

पानेवाले की ओर से प्रेषित  
Signature of the Office

NEW DELHI.

Subject : Complaint about non-receipt of Equity Shares not duly transferred by M/s. Mahadev Corpn. (I) Ltd., Share Dept., A-62, 11 Floor, Rajauri Garden, New Delhi-110027.

Dear Sir,

We had sent 500 Shares to the above Company for transferring them into our name and early return as per copy of TDS enclosed.

Thereafter we wrote to the company anasebi a number of times without any response.

Now we approach you to kindly direct the Company to transfer these shares in our name and send us the Shares along with its entitlement of Bonus Shares and dividend if any at the earliest.

Thanking you,

Yours faithfully,

Encl: Copy of TDS

S. Lakshmi Devi

G. R. PILLA & S. LAKSHMI DEVI.

Copy to: SEBI in furtherance to our letter dated 2nd May, 1997 which has been received at your office as per copy of acknowledgement received back.

Respective : Share Certificate No. are 5338 to 5342 under Folio No. 7299 and Dist. Nos. are 1333701 to 1334101 to 200.

21st June, 1997.

RECEIVED

RECEIVED



REGD A. D.

S. LAKSHMI DEVI  
&  
G. R. P I L L A I,

THANNICKAL,  
THULAMPA RAMPU NORTH,  
MANNARASALA (P.O.),  
HARIPAD : 690550.

The Securities & Exchange Board of India,  
Post Bag No: 19972,  
Marina Point Post Office,  
B O M B A Y - 400 021.

Sub : Non - receipt of Shares duly transferred from  
Mahadev Corpn. (I) Ltd., Share Dept., A-62,  
11 Floor, Rajouri Garden, NEW DELHI-110027.

Dear Sir,

We had sent 500 Shares of the above Company  
as under on 22nd Nov., 1996 through registered AD  
which they had received on 27th of November, 1996  
as per the Acknowledge Received back duly signed:-

Share Certificate No:	Folio	No. of Shares
5342 - 1334101 to 200	7299	100
5342 - 1334001 to 100	"	100
5340 - 1333901 to 4000	"	100
5339 - 1333801 to 900	"	100
5338 - 1333701 to 800	"	100
		500

So far after a lapse of six months the Co.  
did not bother to transfer these shares and send us  
the same duly transferred.

Therefore, you are requested to kindly look  
into the matter and direct the company to send us the  
Shares along with its Bonus and Dividends immediately

Thanking you,

Yours faithfully,

Haripad

2nd May, 1998

S. Lakshmi devi.

S. LAKSHMI DEVI & G. R. P I L L A I

Copy to : The Mahadev Corpn. (I) Ltd.,  
Share Dept., A-62, 11 Floor,  
Rajouri Garden, New Delhi-110027.

### Complaint Details

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