

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA, MUMBAI
CORAM: S. RAMAN, WHOLE TIME MEMBER

ORDER

Under Section 11(1), 11(B) and 11(D) of the Securities and Exchange Board of India Act, 1992 read with Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 in respect of-

1. M/s. Global Mount Money Research and Advisory Pvt. Ltd. (PAN: AAECG8055A)
Directors- Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar,
 2. Global Mount Money Research and Advisory (PAN: AAMFG4008J)
Partners- Mr. Rajeev Singh Rajput and Mr. Arpit Kothari,
 3. Global Money Research and Advisory
Proprietor -Rajeev Singh Rajput (PAN: AQNPR9629P),
 4. Global Money Financial Services (PAN: AAKFG1229R)
Partners- Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar,
 5. Mr. Rajeev Singh Rajput (PAN:AQNPR9629P),
 6. Mr. Arpit Kothari (PAN: ASJPK7357H) and
 7. Mr. Ajay Kumar (PAN: BJPPK5750E).
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1. Securities and Exchange Board of India (hereinafter referred to as "**SEBI**") received information in respect of the activities of a Madhya Pradesh based entity *viz.* Global Mount Money Research and Advisory Pvt. Ltd. (hereinafter referred as "**Global Mount**"/**the entity**) providing investment advice to general public through its website (*www.globalmountmoney.co*), without obtaining necessary registration from SEBI
2. As a matter of preliminary inquiry into the business activities of Global Mount, SEBI vide its letter dated August 22, 2013 sought the following information from the entity:
 - i. Registered/Corporate addresses of company and address of all branches along with contact numbers.

- ii. Details of past and present directors of the company including details such as name, address, PAN and contact details.
- iii. List of all activities undertaken by the entity along with fees charged for each activity.
- iv. Basis of offering investment advice along with the copies of research reports in respect of each recommendation given as an investment advice.
- v. Details of all the employees/retainers along with their qualifications and nature of services offered by them.
- vi. Details of clients to whom investment advice was provided during last six months.
- vii. Certified copy of audited financial statements for last three years.
- viii. Copy of Income Tax Return and Service Tax Return for the last three years.
- ix. Information about registration with SEBI or any other regulators.
- x. Details of any other similar activities, if any.

2.1 The said letter was delivered to the entity. Upon non-receipt of any reply from the entity a reminder letter dated September 25, 2013 was issued to the entity. The said reminder was also delivered to Global Mount as is evident from tracking sheet of India Post. However, no response was submitted by the entity.

3. A SEBI official also visited the office of Global Mount at 504, Shagun Tower, Plot no. 07, PU-04, Scheme no. 54, Vijay Nagar Square, A B Road, Indore, Madhya Pradesh on December 24 and December 31, 2013 to obtain information about the working of Global Mount. It was found that the entity was carrying out investment advisory services in shares, derivatives and commodities.
4. In the meanwhile, it was observed from the website of Global Mount (www.globalmountmoney.co) (which was observed to be fully functional) that the entity continued to provide investment advisory services to general public without obtaining necessary registration from SEBI. It was also observed that regularly updated track sheets of advice/tips given by the company were available on the website of Global Mount.

5. A perusal of the website of the entity revealed that the entity is providing advisory services to general public and is declaring itself as an investment adviser. Following has *inter alia* been mentioned on the website of, Global Mount:

- *"Global Mount Money Research And Advisory is one of the India's finest research and stock advisory company deals in intra-day tips and positional tips. We provide equity tips as well as commodity tips.*
- *We offer diversified range of services as per the investments of an investor, trader or a broker. Global Mount Money offers best stock future tips.*
- *In stock cash tips we provide intraday and positional services. In which we provide tips on cash scripts with most accurate level.*

Demo -Calls :

- *GM CALL :- SELL JK TYRE BELOW 141.25 TG1 140.25 TG2 138.90 TG3 136.90 SL 143.25.*
- *GM CALL :- BUY AJANTA PHARMA ABOVE 946 TG1 953 TG2 962.50 TG3 977 SL 931*
- *We create a safe trading portfolio for HNI's, with balanced asset allocation to different trading products and can take care of the portfolio as an advisor,*
- *Global Mount Money provides Base Metal tips for commodity traders,*
- *We charge some fix amount for this service & assure to return you 2 times profit of the amount what you paid for the subscription of our HNI services."*

5.1 Bank account details of Global Mount as mentioned on its website are detailed below:

Sr. No.	Company Bank Account No.	Type of Account	Bank Name and Branch	Account in the name of-
1.	004105500707	Current	ICICI Bank, Vijay Nagar, Indore	<i>Global Money Research and Advisory</i>
2.	914020025740215	Current	Axis Bank, Vijay Nagar, Indore	<i>Global Money Research and Advisory</i>
3.	50200005745585	Current	HDFC Bank, Vijay Nagar, Indore	<i>Global Money Research and Advisory</i>
4.	1811467853	Current	Kotak Mahindra Bank, M.G. Road, Indore	<i>Global Money Research and Advisory</i>

6. SEBI, vide letter dated May 06, 2014 sought comments/reasons from the entity for the non-compliance with provisions of Section 12(1) of SEBI Act, 1992 and Regulation 3(1) of SEBI (Investment Adviser) Regulations, 2013. However, the said letter got returned undelivered with remark, '*returned to sender- refused.*' In view of this, SEBI official once again visited the office of Global Mount on May 16, 2014. It was found that the entity was fully functional at the same address with approximately 30 employees. It was also understood that Global Mount provides advisory services both in cash and derivative segments.
7. Subsequent to this, SEBI undertook a preliminary examination of the activities of Global Mount. One of the SEBI officers, posed as an ordinary investor, registered for free trials on the website of the entity *viz: www.globalmountmoney.co*. On successful registration, a representative of Global Mount contacted at the mobile number given at the time of registration for free trials. The contents of some of the messages as received are reproduced below:

- "*Welcome to Global Mount Money Family, Our Sales Executive will contact you soon,...*"

7.1 SEBI, vide separate letters dated July 18, 2014 *inter alia* sought following information from Vijay Nagar, Indore Branch of ICICI Bank, Axis Bank and HDFC Bank:

- Bank Statement of account number 004105500707 (ICICI Bank), 914020025740215 (Axis Bank) and 50200005745585 (HDFC Bank) from January 01, 2014 to till date,
- Account opening date,
- Any other account of Global Mount maintained with ICICI Bank, Axis Bank and HDFC Bank from April 01, 2013 to till date,
- PAN and KYC details of the entity

7.2 The aforementioned banks provided the information/documents sought by SEBI, vide e-mails and letters dated July 30, 2014, July 22, 2014, August 22, 2014, September 04 and September 09, 2014.

8. The information/documents furnished by the banks indicate that the directors of Global Mount, *viz:* Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar were also

director/proprietor/partner of various group entities/firms, *viz.* Global Money Financial Services, Global Mount Money Research and Advisory and Global Money Research and Advisory. These entities had also opened accounts with the aforesaid banks.

- 8.1** On the basis of the information and other documents forwarded by the aforesaid banks, clarification about providing advisory services to general public without being registered with SEBI was sought from all the newly identified entities *viz.* Global Money Financial Services, Global Mount Money Research and Advisory and Global Money Research and Advisory and their directors/partner/proprietor *viz.* Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar vide separate letters dated October 07, 2014. One of the directors Mr. Arpit Kothari refused to accept the letter as evident from the track sheet of India post and letter from Global Money Financial Services returned undelivered with a remark ' *addressee moved*'. The letter was delivered to all other entities. Since no reply was received, a reminder, vide separate letters dated October 15, 2014 was issued to all the aforesaid entities. However, one of the directors Mr. Arpit Kothari once again refused to accept the letter and the letter from Global Money Financial Services returned undelivered with a remark ' *addressee moved*'. The letter was delivered to all other entities as evident from the track sheet of India post. However no reply has been received till date.
9. I have carefully perused the complaint received by SEBI, letters sent to Global Mount, its directors and aforementioned related/group entities, information/documents obtained pursuant to the physical verification of the office of Global Mount, information/documents obtained from the MCA Website and the website of Global Mount and other material available on record. The issue for determination in the instant matter is whether Global Mount, its directors, *viz.* Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar and aforementioned related/group entities, *viz.* Global Money Financial Services, Global Mount Money Research and Advisory and Global Money Research and Advisory are continuing to act as an Investment Adviser and is providing Investment Advisory Services to their clients/investors, without obtaining registration from SEBI, in violation of the SEBI Act/Rules/Regulations.
- 9.1** On an examination of the aforementioned material/information available on record, it is *prima facie* observed that,

i. M/s. Global Mount Money Research and Advisory Pvt. Ltd. is registered with RoC, Gwalior on June 13, 2012 with CIN: U74140MP2012PTC028640. It has the registered office address at 156, Ambedkar Nagar, Opposite Christian College, Indore, Madhya Pradesh - 452008.

ii. Details of three directors of the entity are tabulated below:

S. No.	Name	DIN	Address	Date of Appointment
1.	Arpit Kothari	05291344	F-18/3 RD, Luv Kush Awas Vihar, Indore, M.P.	13/06/2012
2.	Ajay Kumar	05291441	270, Gopal Ganj, Orai, Jalun, Uttar Pradesh - 285001	13/06/2012
3.	Rajeev Singh Rajput	05291444	93-A, Abhinandan Nagar, Indore - 452001	13/06/2012

iii. From the updated track sheets of the entity available on the website of the entity, following are noted:

Service	Recommendation on Track Sheets available from
Nifty	01-07-13
Future Premium	15-07-13
Option	15-07-13
Future HNI	19-12-13
Premium Option	27-05-14
Agri Commodity	09-06-14
HNI Commodity	11-06-14
Stock Premium	11-06-14

iv. Bank account details of entity as mentioned on its website are detailed below:

Bank Account Details as given in Website

S. No.	Bank Name	Account Number	Type of Account	Account in the name of-
1.	Axis Bank	914020025740215	Current Account	<i>Global Money Research and Advisory</i>
2.	ICICI Bank	004105500707	Current Account	<i>Global Money Research and Advisory</i>
3.	HDFC Bank	50200005745585	Current Account	<i>Global Money Research and Advisory</i>
4.	Kotak Mahindra Bank	1811467853	Current Account	<i>Global Money Research and Advisory</i>

- v. It is observed that all the aforesaid bank accounts mentioned in the website of Global Mount are in the name of an entity named "*Global Money Research and Advisory*".
- vi. On analysing the information/document furnished by ICICI Bank, Axis Bank and HDFC Bank, such as the Account Opening Forms, KYC documents, Bank Statements etc., it is observed as under:
- a. On perusal of the KYC documents and account opening form, it is observed that the aforesaid entity *viz: Global Money Research and Advisory* is a proprietary concern. The proprietor of the said firm is Mr. Rajiv Singh Rajput, one of the directors of Global Mount.
- b. It is noteworthy to mention that as per the details given in the website of Global Mount (www.globalmountmoney.co/), it is mentioning itself as a company, the payments are required to be made to the account of the aforesaid proprietary concern, *viz: Global Money Research and Advisory*.
- c. Details of all known bank accounts of Global Mount and its directors/promoters, as furnished by ICIC Bank, HDFC Bank and Axis Bank are tabulated below:

Sr. No.	Entity Bank Account No.	Type of Account	Bank Name and Branch	Account in the name of	Name of the director/partner/Proprietor and his/her address	Account Opening Date
1.	12407610000171	Current Account	HDFC Bank, Race Course Road Branch, Indore	Global Mount Money Research and Advisory Pvt. Ltd. (Company - PAN: AAECG8055A)	Directors: Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Ajay Kumar 156, Ambedkar Nagar, Madhya Pradesh Indore, 452010	11/08/2012
2.	914020025740215	Current Account	Axis Bank, Vijay Nagar Branch, Indore	Global Money Research and Advisory (Proprietary concern, PAN: AQNPR9629P)	Proprietor, Mr. Rajeev Singh Rajput 504-Bhukhand 7, PU-4, Vijay Nagar, Indore, M.P.	08/07/2014

3.	004105500707	Current Account	ICICI, Vijay Nagar Branch, Indore	Global Money Research and Advisory (Proprietary concern, PAN: AQNPR9629P)	Proprietor- Mr. Rajeev Singh Rajput 504-Bhukhand 7, PU-4, Vijay Nagar, Indore, M.P.	11/06/2014
4.	50200005745585		HDFC Bank, Vijay Nagar Branch, Indore	Global Money Research and Advisory (Proprietary concern, PAN: AQNPR9629P)	Proprietor- Mr. Rajeev Singh Rajput 504, Bhukhand 7, PU 4, Vijay Nagar, Above Apna Sweets, Shagun Tower, Indore, M.P. - 452010	11/07/2014
5.	00415013591	Current Account	ICICI, Malav Parisar Branch, Indore	Global Mount Money Research and Advisory - (Partnership firm PAN: AAMFG4008J)	Partners- Mr. Rajeev Singh Rajput and Mr. Arpit Kothari 504, Shagun Tower, Plot No. 7, PU 4, Scheme no. 54, A.B. Road, Indore, M.P.	16/09/2013
6.	50200002492506	Current Account	HDFC Bank, Vijay Nagar Branch, Indore	Global Mount Money Research and Advisory (Partnership firm-PAN: AAMFG4008J)	Partners- Mr. Rajeev Singh Rajput and Mr. Arpit Kothari 504, Shagun Tower, Plot No. 7, PU 4, Scheme no. 54, A.B. Road, Indore, M.P.	11/10/2013
7.	12402000003137	-	HDFC Bank, Race Course Road Branch, Indore	Global Money Financial Services (Partnership firm PAN: AAKFG1229R)	Partners- Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Ajay Kumar 156, Ambedkar Nagar, Madhya Pradesh Indore, 452010	21/07/2011
8.	04041000053328	-	HDFC Bank, Vijay Nagar Branch, Indore	Mr. Rajeev Singh Rajput, (PAN:AQNPR 9629P)	43-A, Abhinandan Nagar, Indore, 452010	13/07/2011
9.	04041140045040	-	HDFC Bank, Vijay Nagar Branch, Indore	Mr. Rajeev Singh Rajput (PAN:AQNPR 9629P)	43-A, Abhinandan Nagar, Indore, 452010	10/10/2012
10.	12401050069118		HDFC Bank, Race Course Road Branch, Indore	Mr. Rajeev Singh Rajput (PAN:AQNPR 9629P)	43-A, Abhinandan Nagar, Indore, 452010	07/06/2012

Bank Account Details of Mr. Rajeev Singh Rajput

1.	004101560880		ICICI Bank	Mr. Rajeev Singh Rajput	93-A, Abhinandan Nagar, Indore, Near Electronics Complex	05/09/2011
2.	144101506368		ICICI Bank	Mr. Rajeev Singh Rajput	93-A, Abhinandan Nagar, Indore	16/08/2013

- d. It is observed that the directors of Global Mount are also proprietor/partners etc. of the following proprietary concern/ partnership firms;
- **Global Money Financial Services** (Partnership firm, Partners, Mr. Arpit Kothari, Mr. Ajay Kumar and Mr. Rajeev Singh Rajput),
 - **Global Mount Money Research and Advisory** (Partnership firm, Partners, Mr. Arpit Kothari and Mr. Rajeev Singh Rajput) and
 - **Global Money Research and Advisory** (Proprietary concern, Proprietor Mr. Rajeev Singh Rajput).
- e. The addresses of all the aforesaid entities including Global Mount are also same.
- f. As per the KYC documents, the business activities of all the aforesaid entities are mentioned as '*Share market Advisory Services*'.
- g. The Establishment Certificates issued by the State Government to the said entities confirm the business as '*Stock and Commodity Advisor*'.
- h. The Partnership letter given to ICICI bank by the partnership firm, *viz*, *Global Mount Money Research and Advisory* contains a clause which says "*M/S GLOBAL MOUNT MONEY RESEARCH & ADVISORY carrying on business of STOCK AND COMMODITY ADVISORY at 504 SHAGUN TOWER PLOT NO 7 PU 4 SCHEME NO 54 A B ROAD INDORE (M.P.) 452001.*"
- vii. From the analysis of the bank account statements provided by various banks, where Global Mount and its related/group entities/firms have accounts, it is observed that there are several deposits into the said bank accounts from different parts of the country which are equivalent to the fees charged by Global Mount for various advisory services offered by Global Mount. The

table containing the fees charged by Global Mount, for its advisory services for acting as an investment adviser, as noted from the website is placed below:

Fee Structure of Global Mount (in ₹)

Period↓	Stock Cap Tips	Stock Future Premium	Option	Combo(Cash & Future)	NIFTY FUTURES	MCX normal	MCX premium	NCDEX	MCX Positional
Monthly	6000	10000	7000	12000	5000	15000	25000	15000	15000
Quarterly	15000	25000	18000	25000	12000	40000	60000	35000	40000
Half Yearly	25000	40000	30000	45000	20000	70000	100000	60000	70000

Period↓	Premium cash	Premium Option	Combo(MCX & NCDEX)	Bullions	Base metal + energy	Inventory Call
Monthly	15000	15000	22000	10000	10000	27000
Quarterly	39000	39000	55000	25000	25000	40000
Half Yearly	69000	69000	90000	45000	45000	70000

viii. Transactions which are equivalent to the fees charged by the aforesaid entities are illustrated below.

Consolidated (Credit/Receipt) Transactions

Fee Amount (in ₹)	No. of transactions equivalent to the fee amount			Total No. of transactions
	<i>Global Mount Money Research and Advisory</i> (Account Nos. 00415013591, 50200002492506)	<i>Global Money Research and Advisory</i> (Account Nos. 50200005745585, 914020025740215 and 004105500707)	<i>Rajeev Singh Rajput</i> (Account Nos. 144101506368, 004101560880 and 04041140045040)	
5000	99	30	2	131
6000	16	5	0	21
7000	4	1	0	5
10000	50	11	0	61
12000	4	0	0	4
15000	9	3	0	12
18000	1	0	0	1
20000	10	1	1	12
25000	3	1	3	7
40000	0	0	1	1
90000	0	0	1	1
Total	196	52	8	256

- ix. It is also noted that there are *nil* transactions in bank account having numbers 12407610000171 (Global Mount), 12401050069118 (Mr. Rajiv Singh Rajput), 12402000003137 (*Global Money Financial Services*) and 04041000053328 (Mr. Rajiv Singh Rajput). Further analysis of the bank statements shows that there are various deposits of amount ranging from ₹1000 to ₹4000, which are apparently fees submitted by various clients of the entity, however, such amounts are not mentioned in the fee structure of the entity.
- x. It is observed that these funds are deposited from various parts of country viz. Anantnag, Rajkot, Sri Madhopur, Lucknow, Sangrur, Mahidpur, Chandigarh, Jaipur, Jhansi, Sumerpur, Junagadh, Begumpet, Narayangaon, Amravati, Vapi, Gurgaon, Andheri, Agra, Ahmednagar, Bhavnagar, Surat, Meerut, Bangalore, Hyderabad, Panchkula, Lonawala, Bhayender, Neemuch, Nagpur, Delhi, Varanasi, Vishakhapatnam, Dombivili, Amritsar, Pune, Mumbai, Faridkot, Behrampur, Satna, Karnataka, Sriganaganagar, Raigarh, Sonapat etc.
- xi. From the preliminary examination it is *prima facie* observed as under:
- a. Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar are collecting funds from investors for providing investment advice in the name of different company/ firms /proprietary concern viz. M/s Global Mount Money Research and Advisory Pvt. Ltd., *Global Mount Money Research and Advisory*, *Global Money Financial Services* and *Global Money Research and Advisory*.
- b. It is further observed that M/S Global Mount Money Research Advisory Pvt. Ltd. (Company), *Global Mount Money Research and Advisory* (Partnership firm) and *Global Money Research and Advisory* (proprietary firm) are operating as one entity as is evident from the website of Global Mount, wherein at the home page, the entity was mentioning itself as *Global Mount Money Research and Advisory* and as a company. It is relevant to note that all the bank accounts given on the webpage are of the proprietary firm, viz. *Global Money Research and Advisory*. It is observed that all the directors of Global Mount are partners of the firm, *Global Money Financial Services*.

- c. As has been observed earlier, one of the directors of Global Mount, viz. Mr. Rajeev Singh Rajput is the proprietor of *Global Money Research and Advisory*. Two of the directors of Global Mount, Mr. Rajeev Singh Rajput and Mr. Arpit Kothari are partners of the firm *Global Mount Money Research and Advisory*. It is also noted that all the three directors of Global Mount, viz. Mr. Rajeev Singh Rajput, Mr. Ajay Kumar and Mr. Arpit Kothari are partners of *Global Money Financial Services*.
- d. It is further noted that website of Global Mount, i.e. <http://www.globalmountmoney.co>, the name of the entity is mentioned as *Global Money Research and Advisory* (proprietary firm).
- e. The entity is claiming to have 4232 active clients.
- f. High Accuracy is claimed by the entity, in their tips without any substantial evidence for the same.
- g. Marketing executives of the firm calls prospective clients for registration as free trial clients. Also, some clients register for free trials after pursuing the website of Global Mount.
- h. Tips are being provided to the investors through SMS/calls as evident from the SMS tips and calls received by the SEBI Official, who had registered for free trial, as an ordinary investor.
- i. Bank Account details are mentioned on the website for online payment. From bank statements provided by the respective banks, it is evident that there is a regular flow of funds in bank accounts of the entity from various individuals across the country which is equivalent to fees charged by the entity for his advisory services.

10. In the light of the above analysis and examination, it is evident that the activities of Global Mount, its related/group entities and its afore- mentioned directors/proprietor/partners, of giving trading tips, stock specific recommendations, etc. to the investors clearly indicate that they are engaged in providing investment advisory services to investors on payment of fees as discussed in the preceding

paragraphs, which *prima facie* fall under the definition of "investment adviser" as defined by Regulation 2(m) of the SEBI IA Regulations, which reads as under:

"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;"

10 .1 As per the extant legal provisions, any entity carrying out the activities of a market intermediary should be registered with SEBI and conducts its activities as per the provisions of Section 12(1) the SEBI Act, which reads as under:

*'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.'*

10.2 Further, as per Regulation 3(1) of the SEBI IA Regulations, the registration of the investment advisers is mandatory. It provides as under:

"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."

11. Considering the facts and circumstances of the matter, it is very evident that the activities of Global Mount, its directors and their group/related entities, *viz.* Global Mount Money Research and Advisory, Global Money Research and Advisory and Global Money Financial Services, of giving trading tips, stock specific recommendations, etc. to the investors on a contractual basis on payment of fees falls within the definition of activities of "investment adviser" as defined under Regulation 2(m) of the SEBI Investment Advisers Regulations. Global Mount, its aforementioned related/group entities and its

directors/partners/proprietors are engaged in providing investment advisory services to investors without obtaining necessary registration for the same as mandated by Section 12 (1) of the SEBI Act and Regulation 3(1) of the SEBI Investment Advisers Regulations.

11.1 I, therefore, *prima facie* find that the following entities have been acting as investment advisors without obtaining registration from SEBI to act as such and, thereby, have violated Section 12(1) of the SEBI Act, 1992 read with provisions of Regulation 3 (1) of the SEBI (Investment Advisers) Regulations, 2013:

1. M/s. Global Mount Money Research and Advisory Pvt. Ltd. (promoters/directors are Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar),
2. Global Mount Money Research and Advisory (partners are Mr. Arpit Kothari and Mr. Rajeev Singh Rajput),
3. Global Money Research and Advisory (proprietor is Mr. Rajeev Singh Rajput),
4. Global Money Financial Services (partners are Mr. Arpit Kothari, Mr. Ajay Kumar and Rajeev Singh Rajput),
5. Mr. Rajeev Singh Rajput,
6. Mr. Arpit Kothari and
7. Mr. Ajay Kumar

12. It is relevant to note that in case of default by unregistered entities, no redressal mechanism is presently available to investors under SEBI Act/Rules/Regulations. SEBI (Investment Advisers) Regulations, 2013 *inter alia* provide the framework for regulating the activity of entities who are in the business of providing investment advice in respect of securities and investment products. The Regulations seek to create a standardized operating structure within which investment advisers will operate and also make them duly accountable for their investment advices, by requiring investment advisers to comply with the criteria, set out in the relevant provisions of the SEBI IA Regulations, such as having the prescribed professional qualifications, certifications from competent authorities, conforming to fit and proper criteria, satisfying capital adequacy requirement, adequate infrastructure facilities, etc. In view of this, subjecting the investment advisers to the statutory requirement of registration with SEBI is imperative for the protection of interests of investors and to safeguard the integrity of securities market. In the instant case, Global Mount and its directors, have solicited and induced investors to deal in securities on the basis of their investment advices, stock trade tips, etc.

guaranteeing returns, on their website. In view of this, it is apprehended that investors at large could be misled on account of such unauthorized activities of such unregistered entities.

12.1 SEBI has been entrusted with the duty to protect the interests of investors and protect the integrity of the securities market. Considering the facts and circumstances of the present matter and on the basis of *prima facie* findings, it is necessary to intervene in this matter to take immediate steps to prevent such persons from engaging further clients. This is also a case where, effective and expeditious action is required to be taken to prevent any possible harm to investors caused by the unauthorized activities of the aforementioned entities and its Directors/Partners/Proprietor.

13. In view of the above, I, in exercise of the powers conferred upon me by virtue of Section 19 read with Sections 11(1), 11B and 11D of the SEBI Act, by way of this ad-interim ex-parte order:

i. direct M/s. Global Mount Money Research and Advisory Pvt. Ltd. (PAN: AAECG8055A), Global Mount Money Research and Advisory (PAN: AAMFG4008J), Global Money Research and Advisory (PAN: AQNPR9629P), and Global Money Financial Services (PAN: AAKFG1229R) and its promoters/directors/partners/proprietor, viz. Mr. Rajeev Singh Rajput (PAN: AQNPR9629P), Mr. Arpit Kothari (PAN: ASJPK7357H) and Mr. Ajay Kumar (PAN: BJPPK5750E) to:-

- a) to cease and desist from acting as investment advisers and cease to solicit or undertake such activities or any other unregistered activity in the securities market, directly or indirectly, in any manner whatsoever;*
- b) immediately withdraw and remove all advertisements, representations, literatures, brochures, materials, publications, documents, websites, etc. in relation to their investment advisory or any unregistered activity in the securities market.*

14. The above order is without prejudice to the right of SEBI to take any other action that may be initiated against M/s. Global Mount Money Research and Advisory Pvt. Ltd., Global Mount Money Research and Advisory, Global Money Research and Advisory and Global Money Financial Services and their promoters/directors/partners/proprietor *viz.* Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar in accordance with law.

15. This Order shall be treated as a show cause notice and M/s. Global Mount Money Research and Advisory Pvt. Ltd., Global Mount Money Research and Advisory, Global Money Research and Advisory and Global Money Financial Services and its promoters/directors/partners/proprietor *viz.* Mr. Rajeev Singh Rajput, Mr. Arpit Kothari and Mr. Ajay Kumar may show cause as to why appropriate directions, under the SEBI Act, 1992 and relevant SEBI Rules/Regulations including directions, prohibiting them from buying, selling or otherwise dealing in securities market, either directly or indirectly, in any manner whatsoever, should not be taken against them.
16. The aforementioned entities against whom this order is being passed may file their objections, if any, within twenty one days from the date of this Order and, if they so desire, may avail themselves of an opportunity of personal hearing before SEBI at its Head Office at SEBI Bhavan, C4-A, G-Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 on a date and time to be fixed on a specific request, to be received in this behalf from the entities/persons.
17. This order shall come into force with immediate effect and the directions issued hereinabove shall continue till further orders.

Place: Mumbai
Date: March 12, 2015

S. RAMAN
WHOLE TIME MEMBER
SECURITIES AND EXCHANGE BOARD OF INDIA