

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA

CORAM : V. K. CHOPRA, WHOLE TIME MEMBER

Against M/s Media Investments, a registered sub-broker of BSE broker Joindre Capital Services Limited in the matter of Warner Multimedia Limited

DATE OF HEARING: 12.03.2007

APPEARANCES:

FOR COMPANIES/ BROKERS:

1. Shri. C.B.R Murthy, Authorised Representative of M/s Media Investments
2. Shri. Manoj Singal, Authorised Representative of M/s Media Investments.

FOR SEBI:

1. Mrs Barnali Mukherjee, DGM, SEBI
2. Shri. Vir Sahib Singh, Manager, SEBI
3. Shri. Mohamed Rahaz P.M., Legal Officer, SEBI

ORDER

{Under Regulation 13(4) SEBI (Procedure for Holding Enquiry by Enquiry Officer and Imposing Penalty) Regulations, 2002 in the scrip of Warner Multimedia Ltd}

1.0 Background

- 1.1 Warner Multimedia Limited was originally incorporated as "Garima Commercial Company Limited", on May 23, 1983. Under a scheme of arrangement sanctioned by Calcutta High Court, Ambika Commercial Company Limited and Kennex Commercial Limited, both of which were mainly engaged in investment in shares and securities, were amalgamated with the company with effect from March 31, 1994. The name of the company was changed to "Classic Global Credit & Securities Limited" in June 1993. It was further changed to "Classic Global Securities Limited" (hereinafter referred to as "CGSL") and fresh certificate of incorporation was obtained on July 05, 1994.
- 1.2 The company came out with a public issue of 40 lac equity shares of Rs.10/- each at a premium of Rs.5 each, aggregating to Rs.6 crores in December 1994 to part-finance the setting up of wind power generation plants at Kayathar, Tamilnadu. Total project cost was estimated at Rs 16.5 crores. CGSL was engaged in financial activities in the areas of capital restructuring, mergers, amalgamations, taxation, legal matters, etc. It also undertook appraisal of project reports of its clients and assisted them in preparing technically and financially viable projects. It had also added a host of new activities to its services list such as investment banking, management, advisory services, market studies, capital restructuring etc.
- 1.3 The name of the company was again changed to its present name i.e. Warner Multimedia Limited (hereinafter referred to as "WML") from December 24, 1999 and company informed Bombay Stock Exchange Ltd (BSE) that the reason for change in name was for diversification into Multimedia Entertainment and Tele-media Business. WML also informed BSE that it had changed its main object in Memorandum of Association and the change in name will reflect true nature of its business. It is noticed that during this time technology, media, communication and entertainment scrips were in limelight at the Stock Exchanges and WML was one of such companies which had changed its objects and name.
- 1.4 SEBI received a complaint dated January 24, 2001 against WML alleging that the its registrar had been delaying the endorsement of share certificates with the new name pursuant to the name change from Classic Global Securities Ltd. to WML. It was also alleged that the dematerialisation agent had been delaying the demat requests and such practices were being adopted by the management to create an artificial shortage of shares in the market and thereby rig the share price.
- 1.5 From the price volume data in the scrip on BSE, it was observed that price of the scrip had moved up from Rs. 18/- on September 08, 2000 to a high of Rs 53.30 on December 13, 2000 which is 196% of increase in a period of about 3 months. The average daily traded volume on BSE was just 1000 shares for the period January 01, 2000 to September 08, 2000. This had increased to 17,500 shares per day during the period from September 11, 2000 to December 18, 2000 indicating thereby an increase of more than 16 times. From the price volume data of the scrip on Calcutta Stock Exchange (CSE), it was observed that the price of the scrip had moved from Rs. 20/- on September 21, 2000 to a high of Rs 51/- on December 12, 2000 i.e. increase of 155% in a period of less than 3 months.
- 1.6 In view of the above, SEBI conducted investigation into the affairs relating to buying, selling and dealing in the shares of WML. Investigations revealed that all the major clients of all major trading brokers in the scrip of WML during the

investigation period i.e from September 2000 to December 2000 were interconnected with each other and to the promoters of WML. The trading done by these connected entities accounted for 70% to 100% of settlement wise purchases and sales done in the market during the investigation period. It was also found that volume of trade was mostly concentrated at BSE and as such SEBI investigations was concentrated on the BSE brokers.

- 1.7 Based on the analysis of the trading data of BSE in the scrip for the period of September 11, 2000 to January 25, 2001 top ten trading members on the basis of gross and net purchases and sales were identified. The trading was highly concentrated with top ten members accounting for 85.21% of gross purchases, 78.57% of gross sales, 95.57% of net purchases and 91.45% of net sales. Based on this analysis, details of trading and client details were analysed. Analysis of the trading details, details of delivery and receipt of shares, client registration forms, details received from the company etc. revealed that entities associated with the promoter group had traded through the top ten brokers and their trading accounted for almost 75% of the total trading on BSE. M/s Media Investments was one among the many brokers who transacted heavily in WML scrip during the investigation period.
- 1.8 M/s Media Investments (hereinafter referred to as "Noticee") is a sub broker to Joindre Capital Services Limited, broker of BSE. Shri Anil Gaggar is the Proprietor of Noticee. Investigation revealed that the Noticee had executed trades for the related entities of WML and the Noticee alone accounted for substantial volume of trading in WML scrip at BSE. Investigation further revealed that the Noticee facilitated price manipulation and creation of false market in WML scrip by aiding and abetting entities and individuals associated with the promoters of WML.

2.0 ENQUIRY PROCEEDINGS

- 2.1 On completion of investigation, SEBI vide Order dated November 29, 2002, appointed an Enquiry officer to enquire into the affairs of the Noticee in their dealings in the scrip of WML and violations allegedly committed by them under the provisions of Regulation 4 (a) and (b) of the SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to the Securities Market) Regulations, 1995 (hereinafter referred to as "PFUTP Regulations") and clause D (4) and (5) of Code of Conduct prescribed under the provisions of Regulation 15(1)(b) of SEBI (Stock Brokers and Sub-Brokers) Regulations, 1992 (hereinafter referred to as "Stock Brokers Regulations").
- 2.2 The Enquiry Officer issued a notice dated July 31, 2003 to the Noticee communicating the violations alleged to have been committed by it in terms of Regulation 6 (1) of the Securities and Exchange Board of India (Procedure for Holding Enquiry by Enquiry Officer and Imposing Penalty) Regulations, 2002 (hereinafter referred to in short as "Enquiry Regulation"). The Noticee vide letter dated August 20, 2003 sought time to reply to the show cause notice. Thereafter, Noticee vide letter dated May 28, 2004 sought a personal hearing in the matter, which was given on June 23, 2004. Shri. Anil Gaggar, Proprietor and Shri Manoj Singhal, an Employee of the Noticee attended the hearing before the Enquiry Officer and made their submission.
- 2.3 The Enquiry Officer, after conducting an enquiry in accordance with the provisions of Enquiry Regulations submitted a report dated July 30, 2004 under Regulations 13(1) of the Enquiry Regulations. The Enquiry Officer in his report observed that the Noticee had violated the provisions Regulation 4 (a) and (b) of the PFUTP Regulations and clause D (5) of Code of Conduct prescribed under the provisions of Regulation 15(1)(b) of Stock Brokers Regulations. He recommended that the Certificate of Registration granted to the Noticee as a sub broker may be suspended for a period of two months.

3.0 SHOW CAUSE NOTICE

- 3.1 Pursuant to the receipt of the said Enquiry Report, a show cause notice dated August 10, 2004 was issued to the Noticee, along with a copy of the report thereof, advising it to show cause as to why the action, as recommended by the Enquiry Officer or any other penalty as deemed appropriate should not be imposed on it.

4.0 REPLY OF THE NOTICEE TO THE SHOW CAUSE NOTICE.

- 4.1 The proprietor of the Noticee filed a detailed reply to the show cause notice vide his letter dated September 07, 2004. The Noticee while denying all the findings in enquiry report submitted as under:
- 4.1.1 That the sole activity of Noticee is broking business and they did not carry on any research based activity in the business due to financial and other constraints. Hence, they had not given any advice to the client.

- 4.1.2 That the Noticee neither go into the antecedents of its clients or their relations to any of the promoters of any company / corporate nor ask them about the scrip in which they will be dealing / trading. Accordingly, any new person / entity who wished to be a client and satisfied the registration requirements were enrolled as a client. He further added that he had executed trades for four entities namely (i) Godawari Commerce Pvt. Ltd. (GCPL), (ii) Vaishno Tradelink P. Ltd. (VTPL), (iii) Success Merchant Pvt. Ltd. (SMPL) & (iv) Shri. Gaje Singh Chahal. VTPL was introduced to him by Shri. Natwar Daga who is known to him and who does not have connection with promoters of WML. Similarly, Shri. Govardhan Jain was also introduced to him by Shri. Natwar Daga. Further, Shri. Govardhan Jain introduced GCPL and Shri Ashish Chatterjee. SMPL were introduced by Shri. Ashish Chatterjee.
- 4.1.3 That at any point of time he did not have any knowledge or suspicion about the linkage of the above clients with each other or with WML. The new clients were registered in the normal course of business and he executed their orders in the normal course of business. He stated that he is not responsible for the act of the clients who had dealt with the WML scrip and whose activities led to the increase in the value and volume of the scrip.
- 4.1.4 That he had not violated any of the provisions of PFUTP or Code of Conduct of Sub-brokers.

5.0 HEARING

- 5.1 An opportunity for a personal hearing before me was given to the Noticee on February 19, 2007 at SEBI's Head Office at Mumbai. The Noticee vide letter dated February 15, 2007 sought an adjournment which was granted and next date of hearing was fixed on March 12, 2007. The authorised representatives and advisor of the Noticee Shri. C.B.R Murthy and Shri. Manoj Singal, an Employee of the Noticee attended the hearing and reiterated the submissions they had already made in their reply to the Show Cause Notice. The proprietor had also filed a written submission vide his letter dated March 12, 2007.

- "i) *Media Investments is not connected with either M/s Warner Multimedia Ltd., or any other promoters of WML.*
- ii) *At the time of trade, we did not have any iota of doubts that the entities we dealt with are any way interlinked or connected to Promoters of the Company. Even the client Registration form of all these clients shows different addresses. We have no reason to believe that they are all associates of promoters of WML.*
- iii) *We did all these trades in regular business manner and for the sake of brokerage income only. We were not benefited in any way by executing these orders except to the extent of receiving brokerage, which is the bread and butter of Media Investments.*
- iv) *We never traded at all in this scrip for ourselves.*
- v) *We are also not recommending any buy or sell to the clients of any scrip whether fundamentally strong or not. We are doing trade only on the basis of the instructions of the client at their own risk.*
- vi) *Further, in the year 2000-01 market was in boom condition with good volumes. It was difficult to track the volume of each and every scrip due to large volume in overall market.*
- vii) *The person who introduced the clients is Mr. Natwar Daga who is very well known to us for many years and has no connection, whatsoever, with M/s WML.*
- viii) *We have not transferred the shares to the clients' account till client had debit balance in the books of accounts. Account settled subsequently.*
- ix) *We never had any type of allegation from SEBI / BSE or any other regulatory authority.*
- x) *We also undertake that we will take proper care to ensure that such type of events does not re occur in future."*

6.0 CONSIDERATION OF ISSUES & FINDINGS

- 6.1 I have carefully examined the enquiry report, show cause notice, reply of the Noticee and submissions made at the time of hearing.
- 6.2 I find that the price of the scrip moved from Rs. 18 on September 08, 2000 to a high of Rs. 53.30 on December 13, 2000. Average daily volume in the scrip at BSE was just 1,000 shares from January 01, 2000 to September 08, 2000. During the period of investigation it increased to 17,500 shares. I have examined the financial results of the company WML to ascertain as to whether the above price and volume rise was supported by the financial results which is given hereunder:

(In Rs. crores)

Particulars	Results for Quarter ended:-		Results for Year ended:-		
	March 2001	March 2000	March 2001	March 2000	March 1999

Total Income	8.63	44.39	22.47	68.58	0.21
Total Expenditure	7.89	43.71	22.57	68.58	0.59
Profit After Tax	-(0.22)	-(0.10)	-(0.10)	0.00	-(0.39)
Equity Capital	8.56	8.56	8.56	8.56	8.56
EPS (Rs.)	--	--	--	0.00	0.00
Dividend (%)	--	--	NIL	NIL	NIL

- 6.3 The financial results of the company for two years ended March 31, 2000 and March 31, 1999 reveal quite a dismal position as indicated by above figures. In fact performance during the year ending March 31, 2000 has fallen steeply when compared to previous year, while at the same time during the year there has been significant rise in the price of the scrip. Further, the company had not done any business relating to its changed activity during the years 2000 and 2001. The income and profit indicated in these years were mainly out of sale of shares. In view of these adverse facts, SEBI investigated the entities who played their role to manipulate WML scrip. Investigations inter alia revealed that the major clients of all major trading members trading in WML scrip during that period were interconnected with each other and to the promoters of the company. Trading done by these clients was constituting 70% to 100% of settlement wise purchases and sales done in the market during the period of investigation.
- 6.4 During the investigation, Enquiry Officer examined the role of the Noticee. Shri Anil Gaggar, Proprietor of Noticee is a sub broker to BSE broker, Joindre Capital Services Limited. It dealt on behalf of three of the promoter associated entities, Godawari Commerce Private Limited (hereinafter referred to as "GCPL"), Vaishno Tradelink Private Limited (hereinafter referred to as "VTPL"), Success Merchant Private Limited (hereinafter referred to as "SMPL") and on behalf of Gaje Singh Chahal who also appears to be linked to the promoters, through the above mentioned two brokers and sub-broker M/s Bang Securities Pvt. Ltd. of BSE broker and Nirmal Bang Securities Pvt. Ltd.
- 6.5 As per the distribution schedule submitted by the company to BSE, GCPL is a promoter of WML. The telephone number of GCPL, as per the client details furnished by the Noticee is registered in the name of the Managing Director of WML, Shri. Jagdish Prasad Purohit. It is also observed that a letter of offer for takeover of the company Som Construction & Developers Ltd. had been filed with SEBI. The company, Som Construction & Developers Ltd was having its Corporate Office at the same address as that of the Promoter Company of WML, GCPL i.e. 2, Ganesh Chandra Avenue, Kolkatta – 700013.
- 6.6 As per the distribution schedule submitted by WML to BSE, SMPL is a promoter of WML. Further, as per the record submitted by the Noticee, Shri. Dhruv Narayan Jha was the contact person for SMPL. Shri. Jha was the director of WML as per the Distribution Schedule for the date of September 29, 2001.
- 6.7 The above linkage should be read together with the submission of Noticee that VTPL was introduced to them by Shri. Natwar Daga. GCPL was introduced to it by Shri. Govardhan Jain who in turn was introduced by one Shri. Natwar Daga. SMPL was introduced by Ashish Chatterjee who was in turn introduced by Shri. Govardhan Jain. Thus, it is established that all the clients were linked to each other. Furthermore, all the above clients of the Noticee had not dealt in any scrip other than WML. This also shows the clear intentions of the clients to manipulate the price of WML scrip and to create false volumes. Media Investments evidently aided and abetted these entities in this task.
- 6.8 The proprietor of the Noticee, Shri. Anil Gaggar submitted that he was not aware of any relation of his clients VTPL, GCPL, SMPL and Gaje Singh Chahal to the promoters of WML. Shri. Gaggar also stated that he neither went into the antecedents of the clients or their relations to any of the promoters of any company nor asked them about the scrip in which they would be dealing / trading. I find that the manner of introduction of clients as explained in the preceding paragraphs brings out clearly that Noticee was aware of the linkage of his clients with the promoters of WML. I have also noted that the said clients dealt initially in the scrip of WML only through the Noticee, a fact which has not been disputed by him.
- 6.9 I find that the Noticee bought 2,95,463 shares (21.48%) and sold 3,19,320 shares (23.21%) and its day wise volume was ranging from 0% to 47.42% during the period of investigation. The detail of transactions executed by Noticee are as below (as given on the next page):

Settlement No.	Exchange Volumes	Purchases		Sales		Net Position
		Volume	%	Volumes	%	
25	64198	3000	4.67%	3000	4.67%	0
26	120896	0	0.00%	16100	13.32%	-16100
27	98744	32693	33.11%	5000	5.06%	27693
28	74575	6350	8.51%	8350	11.20%	-2000
29	60475	15000	24.80%	15000	24.80%	0
30	42420	10000	23.57%	10000	23.57%	0
32	107801	14850	13.78%	14850	13.78%	0
33	111152	37045	33.33%	43000	38.69%	-5955
34	32450	15080	46.47%	14975	46.15%	105

35	28676	9025	31.47%	9025	31.47%	0
36	105900	23220	21.93%	50220	47.42%	-27000
37	119575	17500	14.64%	20100	16.81%	-2600
38	173514	49000	28.24%	41000	23.63%	8000
39	57695	9000	15.60%	15000	26.00%	-6000
40	35572	9000	25.30%	9000	25.30%	0
41	54025	15700	29.06%	15700	29.06%	0
42	57925	18000	31.07%	18000	31.07%	0
44	30151	11000	36.48%	11000	36.48%	0

6.10 It can be observed from the above table that Noticee alone accounted for quite substantial volume of trading in the scrip of WML at BSE. All these transactions were on behalf of the entities related to the promoters of WML. In this regard, the proprietor of Noticee submitted that during the year 2000, the market was booming and it was difficult for him to monitor volumes. This is not a convincing argument as even though he may not know the trading volumes during the market time, the details of volumes at exchanges were known to him after the market time. From the trading details, it is observed that trading volumes in WML scrip by the Noticee was more than 20% of the total trading volumes in most of the settlement. Sometimes it is observed that the Noticee traded nearly 50% of the total traded volumes.

6.11 Further, analysis of the client ledgers of Noticee revealed that it carried a debit balance of at least Rs.1,77,960 since December 21, 2000 for VTPL for a period of more than 40 days and it increased to Rs. 2,10,500 on February 01, 2001. Noticee carried a debit balance of at least Rs. 5,98,980 since October 05, 2000 for SMPL for a period of more than 30 days till November 07, 2000 and after that carried a debit balance of at least Rs.60,962 since December 21, 2000 for a period of more than 40 days till at least February 01, 2001. Noticee has submitted that there was a delay in receiving the payments from the clients and balance was carried forward on assurance by the introducers. It has also been observed from the demat a/c details of both VTPL and SMPL that many times during the period of September 1, 2000 to January 31, 2001 both had net delivery receivable obligations. However, at no point during this period were shares delivered to their respective accounts. Noticee has submitted that this was because of the instruction of the two clients not to transfer the shares to their accounts. To prove this stand, the Noticee has not furnished any document to show that these clients had given him authority to do so. Evidently these shares of WML were kept by the Noticee as a security against the above mentioned financing extended to the entities related to the promoters clearly proving thereby that they aided and abetted the entities associated with promoters of WML in manipulating the scrip price and creating false volumes.

6.12 Apart from the above, the Enquiry Officer found that that the Noticee had executed trades through M/s Bang Securities Pvt. Ltd. for its client Gaje Singh Chahal which is also an admitted fact. Hence, Noticee acted as an unregistered sub-broker of M/s Bang Securities Pvt. Ltd. in violation of Section 12 of SEBI Act. I find that the provisions of Rule 3 of SEBI (Stock Brokers & Sub-brokers) Rules 1992, Section 12 of SEBI Act, 1992 and the Circulars issued thereunder clearly prohibit a person from acting as a sub-broker without holding a valid registration from SEBI. In this context, I observe one of the recent decision of the Hon'ble SAT in Appeal No. 89 of 2005 - Dharamshi Capital Services Vs SEBI (Date of decision: 1.3.2007)

"We have heard the learned counsel for the parties. In view of the admission made by the appellant in the grounds of appeal and also by his learned counsel at the time of hearing as referred to above, the charge of aiding and abetting KFL to purchase its own shares from the market stands established. The trades executed by the appellant as a sub-broker also violated Regulation 4 of the aforesaid Regulations. He has also violated the code of conduct. The violation committed is rather serious and, therefore, the Board was justified in debarring him from accessing the capital market for a period of five years. No fault can, thus, be found with this part of the order."

6.13 Considering the fact that the fundamentals of the scrip were not strong and the scrip was considerably illiquid, any prudent stock broker could have doubted the intention of the clients and stopped trading for them. Instead, the Noticee continued trading for number of settlements in such big quantities which resulted in building up of artificial volumes and price in the scrip of WML. In this connection, it would be relevant to refer the following extracts of the order dated September 18, 2003 passed by the Hon'ble Securities Appellate Tribunal in the matter of Madhukar Sheth Vs SEBI (Appeal No.46 of 2002):

"Before executing series of transactions for his client, any prudent broker would have gone a bit far to ascertain the goings around and also would have normally assessed the financial capability of the person for whom he was trading....."

.....The Appellant's submission that he had taken client registration form, entered into agreement etc. by itself was not sufficient. Exercise of due diligence in ongoing transactions is a continuous process and it is not a one time measure to be adhered to while taking up the first transaction. The appellant's submission that it was B's dishonesty that created the problem did not absolve him of his failure to discharge his duties as a prudent broker....."

.....On the basis of the material available on record, it was difficult to conclude that the appellant had exercised due skill and care in dealing with 'B'. It was not that the appellant had carried on only few trade transactions for 'B' for a short period. He had transacted in huge volumes for 'B' and the association dated back to August 2000. If the

appellant could not see any design or pattern in the transactions which 'B' was executing through the appellant during the period, then the appellant certainly deserved to be blamed for being indifferent and unconcerned and for that reason he was at fault for the failure to exercise due skill and diligence.....

.....It is true that a broker cannot act of his own against the instructions of the client. But no one can compel him to be a party to manipulate the market. No doubt a broker is supposed to protect the interest of his client, but he is also expected to protect the interest of the securities market in which he operates. It is his duty to ensure not to be a party to any market manipulation and that the market in which he operates is run on a health and non-manipulative basis."

- 6.14 I find that the promoters of WML along with the entities and individuals associated with them had dealt in the WML scrip in large quantities with a view to manipulate the price and to create artificial and false volume in the scrip. These entities/persons were responsible for about 70% of the total trading in the scrip of WML on BSE and CSE during the investigation periods. The Noticee trading on behalf of these entities facilitated price manipulation and creation of false market in the scrip by aiding and abetting the promoters and entities and individuals associated with them. This act of the Noticee would induce the innocent investors to buy / sell their stocks by such false appearance of trading in securities. This is detrimental to the interest of investors and the orderly development of the securities market. This aspect has already been discussed by the Hon'ble SAT in the matter of Ketan Parekh Vs SEBI. The relevant observation made by SAT in this regard is reproduced as below:

"When a person takes part in or enters into transactions in securities with the intention to artificially raise or depress the price he thereby automatically induces the innocent investors in the market to buy / sell their stocks. The buyer or the seller is invariably influenced by the price of the stocks and if that is being manipulated the person doing so is necessarily influencing the decision of the buyer / seller thereby inducing him to buy or sell depending upon how the market has been manipulated. We are therefore of the view that inducement to any person to buy or sell securities is the necessary consequence of manipulation and flows therefrom. In other words, if the factum of manipulation is established it will necessarily follow that the investors in the market had been induced to buy or sell and that no further proof in this regard is required. The market, as already observed, is so wide spread that it may not be humanly possible for the Board to track the persons who were actually induced to buy or sell securities as a result of manipulation and law can never impose on the Board a burden which is impossible to be discharged."

- 6.15 In view of what is stated above, I find that that the Noticee created artificial price and volume and distorted equilibrium of the scrip of WML. This type of artificial price and volume creation in illiquid scrips gives wrong message to the investors and induces them to trade in the shares and face imminent loss. Further, trades with malafide intention as stated hereinabove tampers with price discovery mechanism of stock exchange. These trades abetted in creating artificial volumes and false market in the scrip of WML. These trades executed by the Noticee are in violation of the provisions of Regulation 4 (a) and (b) of SEBI (Prohibition of Fraudulent and Unfair Trade Practice relating to Securities Markets) Regulations, 1995. Further, by entering such trades the Noticee violated the provisions of Regulation Clause D (5) of code of conduct specified under Regulation 15(1)(b) of SEBI (Stock Brokers and Sub brokers) Regulations, 1992 and Section 12 of SEBI Act, 1992. Having considered all aspects of the matter, I find that the penalty of suspension of certificate of registration granted to the Noticee for a period of one month as against the two months, as suggested by the Enquiry Officer will act a deterrent to such activities in future.

7.0 ORDER

- 7.1 Having regard to all facts and circumstances of the matter and in exercise of the powers conferred upon me in terms of Section 19 of the Securities and Exchange Board of India Act, 1992 read with Regulation 13(4) of Securities and Exchange Board of India (Procedure for Holding Enquiry by Enquiry Officer and Imposing Penalty) Regulations, 2002, I hereby impose a minor penalty of suspension of certificate of registration issued to M/s Media Investments, a sub-broker to Joindre Capital Services Limited, broker of BSE (SEBI Registration no. INS010115710) for a period of one month.
- 7.2 This order shall come into force on the expiry of 21 days from the date of this order.

Place: Mumbai
Date: May 30, 2007

V. K. CHOPRA
WHOLE TIME MEMBER
SECURITIES AND EXCHANGE BOARD OF INDIA