

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA

CORAM: MADHABI PURI BUCH, WHOLE TIME MEMBER

INTERIM EX PARTE ORDER

**Under Sections 11, 11(4), 11B and 11D of the Securities and Exchange Board of India Act,
1992**

**In Re: Securities and Exchange Board of India (Investment Advisers) Regulations, 2013
and SEBI (Research Analyst) Regulations, 2014**

In respect of:

Sr. No.	Name of the Entities	PAN
1	Premium Research Financial Services and its Proprietor Mr. Jeevan Lal Maru	AXUPM0503H
2	Premium Capital Services and its Proprietor Mr. Jeevan Lal Maru	AXUPM0503H

In the matter of Premium Research Financial Services and Premium Capital Services

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1. Securities and Exchange Board of India (“**SEBI**”) has received various complaints against M/s. Premium Research Financial Services (hereinafter referred to as “PRFS”) alleging, *inter alia*, engagement in unregistered investment advisory activities. During the course of examining these complaints, SEBI also came across an entity named M/s. Premium Capital Services (hereinafter referred to as “PCS”) providing investment advisory services without registration. The proprietor of both these entities is Mr. Jeevan Lal Maru and hereinafter, these entities and their proprietor are collectively referred to as the “Noticees”.

SEBI's EXAMINATION

2. In view of the complaints received, SEBI conducted a preliminary inquiry and the following websites of the PRFS and PCS were perused to gather information:

Entity	Website	Status of websites as on 31.07.2019
M/s. Premium Research Financial Services	http://www.premiumresearch.co.in	Inactive
M/s. Premium Capital Services	http://www.premiumcapitalservices.com	Suspended

3. As the website of PRFS was found to be inactive, archives of the pages of the website were downloaded to gather information. The website of PCS was active at the time of the preliminary inquiry; however, the same is suspended at present.
4. Meanwhile, SEBI sent letters dated January 01, 2019, to PCS at its address Office No. 255 PU 4, Scheme No. 54, AB Road, Behind Country Inn, Indore-452001 and to its proprietor, Mr. Jeevan Lal Maru, at House No. 19B, Ambedkar Nagar, Near Shiv Mandir, Indore-452001 and 202, 2nd Floor, Empire Residency, Shri Nagar Ext, Indore-452001. Vide these letters, they were informed about the notification of SEBI (Investment Advisers) Regulations, 2013 (hereinafter referred to as the "IA Regulations"), which have taken effect from 21/04/2013. The Noticees were advised to immediately restrain from providing any further investment advisory services and to provide the following information along with supporting documents:
- Date of start of operations by you and addresses and telephone numbers of all the branches of your firm,
 - Registered corporate address of the entities along with phone numbers, legal structure and PAN;
 - Details of proprietors/partners/directors including address, PAN and phone numbers,

- d. TAN/GSTIN,
- e. URL (website) address for soliciting clients,
- f. Details of various investment advisory products of your firm, terms and conditions,
- g. Number of clients to whom investment advice has been provided and client wise total fees charged since start of operations,
- h. Certified copies of audited financial statement for past three years,
- i. Copy of IT returns filed for past three years,
- j. Copy of bank statements of all bank accounts for the past three years and
- k. Details of any other similar activities, if any, carried out by group/ associate companies.

These letters have not been delivered to the Noticees and have been returned to SEBI as 'Unclaimed'.

5. SEBI obtained the Know Your Client (KYC) forms and bank statements of the following bank account numbers which were mentioned on the websites of these entities:

Name of Entity	Bank Account Number	Bank Name	Month and year of Account opening
PRFS	144105500510	ICICI Bank	August 2014
PRFS	916020018557086	Axis Bank	March 2016
PCS	201001526722	IndusInd Bank	August 2017

IndusInd Bank also informed SEBI about the following bank account held by it in the name of PRFS:

Name of Entity	Bank Account Number	Bank Name	Month and year of Account opening
PRFS	200999774603	IndusInd Bank	November 2014

6. I have perused the materials available on record such as investor complaints, information available on the website of PRFS and PCS and information obtained from various Banks, etc. A preliminary examination of the material available on record was made in order to verify whether the Noticees have offered investment advisory/ research analyst services and collected money from various investors without registration from SEBI. In this context, *prima facie*, the following issues arise for determination in the instant matter:

- 1) Whether the activities of the Noticees, prima facie, are in the nature of Investor Advisory activities?***
- 2) Whether the Noticees have, prima facie, held out themselves to be a Research Analyst?***
- 3) If answers to issues No. (1) and (2) are affirmative, whether the Noticees have, prima facie, violated the provisions of Section 12(1) of the SEBI Act, Regulation 3(1) of the IA Regulations and Regulation 3(1) of the SEBI (Research Analysts) Regulations, 2014 (hereinafter referred to as the RA Regulations)?***
- 4) If answer to issue No. (3) is in affirmative, whether urgent directions, if any should be issued against the concerned entities?***

Issue No. 1: Whether the activities of the Noticees, prima facie, are in the nature of Investor Advisory activities?

Issue No. 2: Whether the Noticees have, prima facie, held out themselves to be a Research Analyst?

7. As regards the first issue, I note the following from the material available on record:
- a. PRFS and PCS are proprietorship firms and their proprietor is Mr. Jeevan Lal Maru. The KYC of PRFS obtained from Axis Bank indicates its constitution as 'Proprietorship' and the authorized signatory is Jeevan Lal Maru who has been designated as the Proprietor. The certificate issued by the District Labour Office,

Indore, dated 20/06/2014, for PRFS, also has the name of Jeevan Lal Maru mentioned as its owner and manager. The KYC of PRFS executed with ICICI Bank also indicates its constitution as 'Proprietorship', with Jeevan Lal Maru as the Proprietor. Similarly, the KYC of PCS obtained from IndusInd Bank indicates its constitution as 'Proprietorship', with Jeevan Lal Maru as the sole authorized signatory to this account. The date of incorporation of PCS is indicated as 10/08/2017 in the KYC of IndusInd Bank.

- b. The Noticees have websites with the addresses, <http://www.premiumresearch.co.in> and <http://www.premiumcapitalservices.com>.
- c. As per records available with SEBI, the most recent complaint against PRFS has been received on February 11, 2019, while the most recent complaint against PCS has been received on March 08, 2019.
- d. As per the information gathered from the websites of PRFS and PCS, the following claims are noted:
 - i. *PRFS is a team of highly experienced research analysts who deliver their best recommendations in Stock market and Commodity market.*
 - ii. *The products of PRFS range from intraday stock advisor to PMS services in both BSE/NSE and MCX/NCDEX.*
 - iii. *PRFS provides accurate tips related to the stock and share market with great accuracy percentile. Their expert teams works dedicatedly in order to make intense research and then give calls to stock traders in NSE and BSE ensuring profit.*
 - iv. *PRFS gives 3 to 4 recommendations daily and provide calls or tips through SMS or Yahoo Messenger.*
 - v. *PCS is a research house and an investment advisory group carrying out operations in the Indian equities and commodity market. They generate intraday as well as*

delivery calls in Stock cash and F&O in NSE, BSE, Commodities, including bullions, metals and agro-commodities traded in MCX and NCDEX.

- vi. PCS provides live recommendations through SMS and Chat room. Their SMS facility is a very effective system which ensures the instant message delivery without any loss of time, so the clients get sufficient time to execute their trades in order to fetch maximum profits.*
 - vii. PCS is providing services in various categories such as Equity, Commodity and Derivatives. The services are Intraday Future tips, Intraday Option tips, Commodity Bullion, Commodity Agri, etc.*
 - viii. The vision statement of PCS is to be India's best advisory in terms of service and job provider. Their highly qualified research team comprising of MBAs (Finance), CFA and Engineers and they are competent and well versed with the complexities and finer details of the Indian financial market. Their main goal is to provide accurate and timely calls (tips) to their clients, where the clients can earn handsome profit.*
 - ix. The investment differs from segment to segment. There is no such minimum investment required for their calls. The client can choose the lot size according to their convenience but it would be easier for the client to have atleast Rs. 50,000 to trade in intraday efficiently.*
- e. Illustration of one of the subscription packages provided by PCS and the fees for the same are as under: (in Rs.)*

<i>Intraday Future Tips</i>	<i>Fees</i>
Monthly	15,000/-
Quarterly	35,000/-
Half yearly	65,000/-
Yearly	1,21,000/-

*Commodity Bullion**Fees*

Monthly	51,000/-
Quarterly	1,21,000/-
Half yearly	1,81,000/-
Yearly	2,51,000/-

8. Considering the above analysis of the details of websites of these entities, I, *prima facie*, observe that PRFS and PCS have represented as follows:
- a. *PRFS and PCS are investment advisory firms related to stock market for buying and selling of financial instruments.*
 - b. *Stock and commodity market tips/ recommendations are provided to the clients through calls/ SMS/ chat.*
 - c. *Different packages are offered to the clients for different fees going upto a maximum amount of Rs.2,51,000/- for yearly subscription to their services.*
9. Further, I note the following information gathered from the KYC documents and bank account statements collected from the banks viz., ICICI Bank, Axis Bank and IndusInd Bank:
- a. As per the KYC documents of these bank accounts, the nature of business of PRFS has been stated to be as ‘Service Provider’ (in Axis Bank), ‘Services - Advisory Share Market’ (in ICICI Bank), while that of PCS has been stated to be ‘Service Provider - Financial Consultancy’ (in IndusInd Bank).
 - b. The transactions observed in the above mentioned bank accounts of PRFS and PCS are summarized as under:

Account Name	PAN	Account Number	Transaction Period	Total Credits
PRFS	AXUPM0503H	144105500510	06/08/2014 till 19/06/2017	Rs. 2,47,27,730/-
PRFS	AXUPM0503H	916020018557086	31/03/2016 till 17/11/2018	Rs. 1,32,44,306/-
PRFS	AXUPM0503H	200999774603	28/01/2016 till 03/04/2017*	Rs. 11,00,000/-
PCS	AXUPM0503H	201001526722	10/05/2017 till 09/07/2019	Rs. 1,10,88,500/-
			Grand Total	Rs.5,01,60,537/-

* Note: This bank account has been opened in August 2014 and as such, the grand total of all the credits received into these four bank accounts could be more.

- c. I note from the ICICI Bank statements that there are 620 credit transactions (excluding payments from PayU Money) which range from round figures of Rs.1,000/- to Rs. 10,00,000/-, which aggregate to around Rs. 1.8 crores. These amounts, *prima facie*, appear to have been collected towards advisory fees as can also be seen in the complaints made against the entities. Similarly, the IndusInd Bank account of PCS has around 206 credits in the range of round figures of Rs. 1,000/- to Rs.7,60,000/-, which aggregate to around Rs. 1.10 crores. These amounts, *prima facie*, also appear to have been collected towards advisory fees.
- d. ICICI vide e-mail dated Jan 9, 2019 to SEBI stated that Mr. Jeevan Lal Maru is also holding a Bank account having Number, 144101508389. However, from the Bank account details of PCS, there are transfers from the Indus Ind Account (201001526722) to the said account having Number 144101508389, for instance, on November 14,2018(Rs. 60,000) and December 17,2018 (Rs. 1,00,000). Therefore, there exists a *prima facie* evidence of diversion of proceeds of money collected from the investors in its account, i.e., Indus Ind Account (201001526722) to ICICI Account (144101508389).

- e. Similarly, I note from the bank statements of the above entities and the complaints received against PRFS and PCS that these entities were also found to be collecting moneys through a payment gateway, viz., PayU Money (PayU Payments Private Limited). The transactions observed in these payment gateways are summarized as under:

Entity Name	Payment Gateway	Linked Bank Account Account Number	Transaction Period	No of Transactions	Aggregate Transaction Amount
PRFS	PayU Money	144105500510	06/08/2014 till 19/06/2017	225	Rs.60,06,694/-
PRFS	PayU Money	916020018557 086	31/03/2016 till 17/11/2018	58	Rs.27,78,275/-
			Total	283	Rs. 87,84,969/-

- f. There are no transactions through PayU Money in the IndusInd Bank accounts of PRFS and PCS.
- g. There are no credit transactions in the IndusInd Bank Account of PRFS after 03/04/2017, in the ICICI Bank account of PRFS after 19/06/2017, in the Axis Bank account of PRFS after 16/07/2018. However, there are transactions in the IndusInd Bank account of PCS, with the last credit transaction of Rs. 1,60,000/- taking place on 27/06/2019.
10. Considering the above facts and circumstances especially, the content of the websites coupled with the credit transactions in the Bank Accounts and through *PayUMoney*, as detailed in preceding paragraphs, *prima facie*, it is inferred that the fees/ funds collected

through *PayUMoney* and amounts credited directly to the Bank Accounts, were for the purpose of availing the services indicated on the websites of these entities.

11. Hence, as reflected in the bank statements referred to above, I note that PRFS has commenced with the collection of fees/ funds for the purpose of availing the services, as indicated on its website, from August 2014 till July 2018, while PCS has commenced the same from August 2017 with the last such credit taking place in June 2019.
12. I have perused the definition of Investment Adviser as given in Regulation 2(m) of the IA Regulations, which states that 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*”. Further, I have perused Regulation 2(l) of the IA Regulations which defines Investment Advice as “*advice relating to investing in, purchasing, selling or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral or through any other means of communication for the benefit of the client and shall include financial planning.*”
13. Therefore, I find that the activities of Noticees such as giving trading tips, stock specific recommendations, etc., to the investors and general public on payment of fees clearly indicate that they were engaged in providing investment advisory services.
14. I find that the Noticees have also held out themselves to be Research Analysts by calling themselves to be a ‘team of Research Analysts’ and ‘Research House’. Regulation 3(1) of the RA Regulations provides “*On and from the commencement of these regulations, no person shall act as a research analyst or research entity or hold itself out as a research analyst unless he has obtained a certificate of registration from the Board under these regulations.*”

15. Thus I find that the Noticees viz., M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru are, *prima facie*, engaged in providing the Investment Advisory services and have also held out themselves to be Research Analysts.

Issue No. 3: If answers to issues No. (1) and (2) are affirmative, whether the Noticees have, prima facie, violated the provisions of Section 12(1) of the SEBI Act, Regulation 3(1) of the IA Regulations and Regulation 3(1) of the SEBI (Research Analysts) Regulations, 2014 (hereinafter referred to as the RA Regulations)?

16. In order to ensure that no investor is defrauded, it is imperative that any person carrying out investment advisory activities has to necessarily obtain registration from SEBI and conduct its activities in accordance with the provisions of SEBI Regulations. Section 12(1) of the Securities and Exchange Board of India Act, 1992 (“**SEBI Act**”) 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:”*

Further, as per Regulation 3(1) of the IA Regulations, the registration of the investment advisers is mandatory. It provides that, *“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”*.

Regulation 3(1) of the RA Regulations also provides *“On and from the commencement of these regulations, no person shall act as a research analyst or research entity or hold itself*

out as a research analyst unless he has obtained a certificate of registration from the Board under these regulations.”

17. The activities of Noticees, as brought out from the various materials described above, seen in the backdrop of the aforesaid provisions show that the Noticees have acted as investment advisers. However, no material was available on record to indicate that the Noticees have a certificate of registration as investment adviser. One complainant has submitted a copy of a SEBI Investment Advisor Registration Certificate bearing number INA100003287 and in the name of PRFS. However, a search of SEBI records indicates that the certificate with number INA100003287 has been issued to an Investment Adviser named M/s. PFC Capital Advisory Services Ltd., which is based in New Delhi.
18. Further, as per records available with SEBI, none of the Noticees are registered with SEBI in the capacity of a Research Analyst.
19. In this context, it is noted that none of the Noticees are registered with SEBI in the capacity of an Investment Advisor or Research Analyst and the characteristics and features of the business activity carried out by the Noticees, as discussed in the preceding issue, *prima facie*, leads to the conclusion that M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru are providing services of an investment adviser without a certificate of registration. Similarly, I *prima facie*, note that M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru are holding out themselves to be a Research Analyst without a certificate of registration.
20. In my view, these activities/representations are in violation of various provisions of IA and RA Regulations and such unregistered investment advisors/ research analysts like the Noticees can put investors at great risk by misleading them. Thus, the activities of M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru are, *prima facie*, in violation of Section 12(1) of SEBI Act read with Regulation 3(1) of the IA Regulations. Similarly, the representation of M/s.

Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru, as Research Analysts, are also in violation of Section 12(1) of SEBI Act read with Regulation 3(1) of the RA Regulations.

21. SEBI has a statutory duty to protect the interests of investors in securities and promote the development of, and to regulate, the securities market. Section 11 of the SEBI Act has empowered it to take such measures as it thinks fit for fulfilling its legislative mandate. IA Regulations have been formulated with the main objective of regulating such activities to safeguard the interests of investors and hence registration of such activities with SEBI has been made mandatory. IA Regulations, *inter alia*, seek to create a structure within which investment advisers will operate and also make them duly accountable for their investment advice by requiring investment advisers to comply with the criteria set out in the relevant provisions of the IA Regulations. The same is imperative for the protection of interests of investors and to safeguard the integrity of the securities market. In the instant case, the Noticees are soliciting and inducing the investors to deal in securities market on the basis of investment advice, stock tips etc., *prima facie*, without having the requisite registration/certification as mandated under the IA Regulations. Similarly, I also note that the Noticees have held out themselves to be Research Analysts without having the requisite registration as mandated under the RA Regulations. Further, it is noted from material available on record, money has been credited to the Bank accounts of the Noticees. This, *prima facie*, indicates that the Noticees are carrying on their unregistered investment advisory activity and holding out themselves to be unregistered research analysts and thus, have violated the provisions of Section 12(1) of the SEBI Act, 1992, Regulation 3(1) of the IA Regulations and Regulation 3(1) of the RA Regulations.

Issue No. 4: If answer to issue No. (3) is in affirmative, whether urgent directions, if any should be issued against them?

22. Considering the facts and circumstances of the present matter and on the basis of the *prima facie* findings, it is necessary to take urgent preventive action in this matter and to take

immediate steps to prevent the Noticees from collecting any more funds from the public and indulging in unauthorized investment advisory. While the websites of the entities are inactive/ suspended at present, SEBI has also come across another website named www.equitymoneyguru.com, which looks exactly similar to the website of PCS and can be accessed by investors. The contact address mentioned on this website “A.B. Road, Indore, M.P.” is also similar to the addresses mentioned on the websites of PRFS and PCS. While no payment details have been mentioned on this website, under the section of ‘KYC Form > Download > For Individual/ Non-Individual’, when the ‘Download’ link is clicked, the site is routed to the website of Premium Capital Services, which is suspended at present. Hence, it can be inferred that the website www.equitymoneyguru.com is also related to PCS and to the proprietor, Mr. Jeevan Lal Maru. Therefore, the probability of investors reaching the connected Noticees through a website are still high. Also, a page on Facebook in the name of Premium Capital Services is still active. This page contains an address similar to that of PCS with a contact number and also provides a link to the suspended website of PCS. Thus innocent investors may still be vulnerable to the unauthorized activities of the Noticees.

23. SEBI has also taken note of the following complaints made against the Noticees:
- a. SEBI received a complaint dated February 20, 2017, in SCORES, against PRFS with the complainant stating that he invested Rs. 30000/- with PRFS for one time investment on 20% return per month. No such return was provided and complainant was asked to further deposit Rs. 10000/- to obtain the return of the initial capital.
 - b. Similarly, another complainant, vide complaint dated October 18, 2018, in SCORES, stated that he has paid Rs. 10000/- to PRFS by PayU Money through his credit card. Thereafter, he lost Rs. 30000/- after working with PRFS. His requests for refund have not been replied to. The complainant has assigned the complaint category as ‘Investment Adviser’.

- c. A complaint dated December 22, 2017, can be seen on a public forum www.complaintboard.in wherein the complainant has stated that PRFS took Rs. 2,45,000/- from him and also signed an agreement with him assuring him minimum 30% return on his investment. The agreement also states that PRFS will invest the capital in segments like equity, commodity, currency, etc. Further, PRFS is also ready to manage the portfolio of the complainant for a minimum investment of Rs. 5,00,000/-
 - d. Another complainant has stated that she gradually invested Rs. 12,50,000/- alongwith GST with PRFS and they assured a return of 22% on the investment. Thereafter, they asked her to pay another Rs. 12,50,000/- citing some a circular of SEBI. The complainant has stated that neither are they returning the capital nor replying to her emails/ phones.
 - e. Another complainant has stated that he was telephonically contacted by an executive of PRFS for portfolio management and he paid them Rs. 22000/- by credit card. They assured him 20% return every month and thereafter, they asked him to pay Rs. 50000/- for a return of 30% per month.
24. Further, as noted in paragraph 7 (c) of this order, SEBI has received complaints as recently as February and March 2019 against the Noticees. The Noticees are also making telephone calls to people, as alleged by a few complainants, for the purpose of enticing them to invest with them by offering them high returns per month. This shows that the Noticees are reaching investors by telephone calls as well, other than through the website. Therefore, the threat of investors getting lured towards the unregistered investment advisory and their holding out themselves to be research analysts is still in existence and imminent. The amount of money, *prima facie*, observed to have been collected by the Noticees is approximately Rs. 5 crores and indicates the magnitude of the prospective threat to the investors. Therefore, even today, investors can become prey to the different packages offered by the Noticees. In light of the same, I find that there is no other alternative but to take recourse through an interim ex-parte order against the Noticees viz., M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz.,

Mr. Jeevan Lal Maru, for preventing them from collecting funds and indulging in unauthorized investment advisory services and holding out themselves to be research analysts without obtaining the mandatory registrations from SEBI in accordance with the law. In order to protect prospective investors from making payment to the bank accounts of the Noticees, credit into bank accounts needs to be stopped.

25. Further, one of the directions that can be passed against the Noticees, subject to the adjudication of the allegation on the merits in the final order, under Sections 11, 11(4) and 11B of SEBI Act is that of direction to refund the money collected by them from their clients. With the initiation of quasi-judicial proceedings, it is possible that the Noticees may divert the money collected from their clients, especially where the Noticees have not co-operated with SEBI and in view of the prima facie evidence mentioned in para 9(d) of this order. The same may result in defeating the effective implementation of the direction of refund, if any to be passed after deciding the matter on merits. Non-interference by the Regulator at this stage would therefore result in irreparable injury to interests of the securities market and the investors. It therefore becomes necessary for SEBI to take urgent steps of stopping the debits from the bank accounts of the Noticees.
26. In view of the foregoing, pending conclusion of enquiry, in order to protect the interests of investors and integrity of the securities market, I, in exercise of the powers conferred upon me under Sections 11, 11(4)(b), 11B and 11D read with Section 19 of the SEBI Act hereby issue by way of this *interim ex-parte order*, the following directions:
 - a. M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru (PAN: AXUPM0503H) are directed to:
 - i. *Cease and desist from acting as an investment advisor and cease to solicit or undertake such activity or any other activities in the securities market, directly or indirectly, in any matter whatsoever until further orders;*

- ii. *Not access the securities market and buy, sell or otherwise deal in securities in any manner whatsoever, directly or indirectly, until further orders;*
 - iii. *Not divert any funds raised from investors, kept in bank account(s) and/or in their custody until further orders;*
 - iv. *Immediately withdraw and remove all advertisements, representations, literatures, brochures, materials, publications, documents, websites, communications etc., in relation to their investment advisory activity or any other unregistered activity in the securities market until further orders.*
 - v. *Provide a full inventory of all assets held in his name or his proprietary firm's name i.e., Premium Research Financial Services and Premium Capital Services, whether movable or immovable, or any interest or investment or charge on any of such assets, including details of all bank accounts, demat accounts and mutual fund investments, immediately but not later than 5 working days from the date of receipt of this order.*
 - vi. *Directed not to dispose of or alienate any assets, whether movable or immovable, or any interest or investment or charge on any of such assets, held in his name or his proprietary firm's name i.e., Premium Research Financial Services and Premium Capital Services, including money lying in bank accounts except with the prior permission of SEBI.*
- b. Banks, including, Axis Bank, ICICI Bank and IndusInd Bank wherein M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru (PAN: AXUPM0503H) are holding bank accounts, are directed not to allow any debits/ withdrawals from and credits to the said accounts, without the permission of SEBI. The Banks are also directed to ensure that all the above directions are strictly enforced.
- c. Depositories are directed to ensure that till further directions no debits are made in the demat accounts, of Mr. Jeevan Lal Maru (PAN: AXUPM0503H), proprietor of Premium Research Financial Services and Premium Capital Services, held jointly or solely.

- d. Registrar and Transfer Agents are also directed to ensure that till further directions the securities / units held in the name of Mr. Jeevan Lal Maru, jointly or severally, are not transferred / redeemed.
- 12 This Order is without prejudice to the right of SEBI to take any other action that may be initiated against M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru in accordance with law.
- 13 This Order shall be treated as a show cause notice and M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru may show cause as to why the investment plans and various schemes floated by them should not be held as "*Investment Advisory Services*" in terms of the IA Regulations and thereby their activity be treated as unregistered activity under relevant SEBI Regulations, why appropriate directions, under Sections 11, 11(4), 11B and 11D of the SEBI Act and relevant SEBI Rules/Regulations including directions to continue the prohibition on them from buying, selling or otherwise dealing in securities market, either directly or indirectly, in any manner whatsoever, for a particular period and why any direction to refund the amount collected from the investors/clients for its various schemes under Sections 11 and 11B of SEBI Act should not be issued against them.
- 14 The, *prima facie*, observations contained in this Order are made on the basis of the material available on record. In this context, M/s. Premium Research Financial Services and M/s Premium Capital Services and their proprietor viz., Mr. Jeevan Lal Maru may, within 21 days from the date of receipt of this Order, file their reply, if any, to this Order and may also indicate whether they desire to avail an opportunity of personal hearing on a date and time to be fixed on a specific request to be made in that regard.
- 15 The above directions shall take effect immediately and shall be in force until further orders.

16 A copy of this order shall be served upon all the Noticees, Banks, Stock Exchanges, Depositories and Registrar and Transfer Agents for necessary action and compliance with the above directions.

Date: August 26, 2019

MADHABI PURI BUCH

Place: Mumbai

WHOLE TIME MEMBER

SECURITIES AND EXCHANGE BOARD OF INDIA