

CONFIDENTIAL

DISCIPLINARY COMMITTEE [BENCH – IV (2023-2024)]

[Constituted under Section 21B of the Chartered Accountants Act, 1949]

Findings under Rule 18(17) and Order under Rule 19(2) of the Chartered Accountants (Procedure of Investigations of Professional and Other Misconduct and Conduct of Cases) Rules, 2007.

File No: [PPR/P/398/2017-DD/167/INF/2018-DC/1444/2021]

In the matter of:

CA. Ravinder Kumar (M. No. 088935), Punjab In Re:
Proprietor, M/s Ravinder Gulati & Associates
Chartered Accountants
H. No. 121, Guru Nanak Pura,
Phagwara - 144401

.... Respondent

MEMBERS PRESENT:

CA. Ranjeet Kumar Agarwal, Presiding Officer (In person)
Shri Jiwesh Nandan, I.A.S. (Retd.), Government Nominee (In person)
Ms. Dakshita Das, I.R.A.S. (Retd.), Government Nominee (In person)
CA. Mangesh P Kinare, Member (In person)
CA. Cotha S Srinivas, Member (In person)

DATE OF FINAL HEARING : 22nd January 2024

PARTIES PRESENT:

Respondent : CA. Ravinder Kumar (Through VC)
Counsel for Respondent : CA. C.V. Sajan (Through VC)

1. Background of the Case:

A letter dated 25th September 2017 was received from the Office of Superintendent of Police, CBI, Anti-Corruption Branch, Chandigarh, containing various allegations against the Respondent after a complaint was

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made to it by Bank of Baroda, Jalandhar regarding fraud committed in various CC limits, ODBTLs and term loans sanctioned by the officials of the bank which were availed by various entities. The Respondent had purportedly audited the financial statements of certain enterprises, the name of which were contained in the said complaint made by Bank of Baroda.

2. Charges in brief:

- 2.1** The Respondent purportedly prepared the balance sheet of the Firm, M/s B.K. Enterprises, Phagwara for the Financial Year ending on 31st March 2011. But the firm was allegedly not in existence at that time as the same was registered with Excise and Taxation Department, Phagwara only on 12th December 2012.
- 2.2** The Respondent purportedly prepared the Tax Audit Report of the Firm, M/s B. S. Publishers, Phagwara for the financial year ending on 31st March 2011 and 31st March 2012. But the said firm was allegedly not in existence as there was no registration of the said firm with Excise and Taxation Department, Punjab and also, no VAT returns were filed by the firm with the Excise and Taxation Department, Phagwara, Punjab.
- 2.3** The Respondent did not mention the Permanent Account Number of Smt. Sunita Seth, Proprietor of M/s V S Enterprises, in the tax audit report for the financial year ending on 31st March 2011 which was required to be disclosed. Also, in the said audit report, there was no mention of sales to sister / associate concern which was required to be mentioned by the auditor u/s 40A(2) of the Income Tax Act.
- 2.4** With regard to the firm, M/s P K Enterprises, the Respondent purportedly authenticated Form VAT15 for the quarter ending in June, 2011, September 2011, December 2011 and March 2012, showing fake VAT Number and also purportedly prepared the Balance Sheet (*sic* audit report) of said Firm as on 31st March 2012 despite the fact that the said firm was not in existence during that period.

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- 2.5 The Respondent had prepared the balance sheet of M/s Subhash Sing & Co. for the financial year ending on 31st March 2010, 31st March 2011 and for the period ending on 20th February 2012 (provisional) to get finances from the bank. However, the said firm was registered with Excise and Taxation Department, Phagwara only on 12th December 2012.
- 2.6 The Respondent did not mention the name and PAN of Proprietor of M/s Meek Enterprises, Phagwara for the Financial Year ending on 31st March 2011 which was mandatory for the auditor.
- 2.7 The Respondent prepared the balance sheet of M/s M K Traders, Phagwara on 8th January 2013 which was not in existence during that period.
- 2.8 The Respondent prepared the tax audit report of M/s Unique Traders, Phagwara for Financial Year ending on 31st March 2011. However, the PAN and name of proprietor / partners was not mentioned in Form 3CD of Tax Audit Report.
- 2.9 The Respondent prepared the tax audit report and authenticated Form VAT20 of M/s U R Enterprises for Financial Year ending on 31st March 2009 and 31st March 2011 despite the fact that the firm was not in existence. The said firm got registered with Excise and Taxation Department on 2nd June 2011 with VAT No. 03972090500.

3. **The relevant issues discussed in the Prima facie opinion dated 11th August 2020 formulated by the Director (Discipline) in the matter in brief, are given below:**

- 3.1 The Respondent had disowned all impugned financial statements / documents alleged to be certified / audited / issued by him. The Respondent had asserted that his name was 'Ravinder Kumar', however, in all documents relied upon by the Informant Department, the name of 'Ravinder Gulati' was mentioned. The Director (Discipline) called upon the registration documents of the Respondent from the Members and Students Section

(M&SS) of ICAI whereby it was observed that the Respondent got registered his firm name as M/s Ravinder Gulati and Associates. Further, the Respondent had submitted an affidavit dated 13th March 1990 before ICAI, from which it was observed that 'Ravinder Kumar' and 'Ravinder Gulati' were the same persons. As far as the issue of using the name of Mr. Ravinder Gulati in the documents relied upon by the Informant department was concerned, the Respondent had not placed on record any document to establish that he used his name as 'Ravinder Kumar' only in all the papers in due course of his professional assignments. Further, the statement of the Respondent recorded by the Informant Department was also available on record wherein the Respondent's statement was recorded by the Informant Department inter alia mentioning his name as 'Ravinder Gulati' on the document.

3.2 The Respondent had asserted that his signatures and stamp had been forged in the documents including the balance sheets of various entities relied upon by the Informant Department. Moreover, the wrong address of the Respondent firm was mentioned in the documents relied upon. On perusal of the documents received from the M&SS Department of ICAI, it was observed that the signature and the address of the Respondent on the documents with ICAI and that placed on record by the Informant department, were different. However, in a situation wherein such serious allegations of fraud were alleged against the Respondent, as a matter of prudence, the Respondent ought to have filed a police complaint or registered a matter before the Court or had taken any other step, whatsoever, to prove the forgery, as claimed. However, nothing had been provided by the Respondent to establish that he ever filed a formal complaint with the police or the Court in this regard or before any other authority. Hence, in the circumstances, a mere statement by the Respondent that the signatures or the address on the impugned document did not belong to him, cannot be treated as gospel truth in the absence of supporting documents to establish the assertion so made by the Respondent. Hence, in the circumstances, no benefit could be extended to the Respondent, at prima facie stage.

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3.3 The Respondent asserted that he was wrongly dragged into the matter; however, he himself was the whistle-blower. In this connection, the Respondent provided two letters, both dated 20th June 2013 which were addressed to the Chief Manager, Bank of Baroda. However, on the said letters so placed on record, there was no receiving / document to show receipt of the said letters with the bank. The Respondent had not provided any other document to show that in furtherance to the said letters, he took any action, big or small, to establish the assertions made by him in the aforesaid letters.

3.4 Further, as far as the assertion of non-receipt of any fees by the parties and the use of the word "purportedly" by the Informant Department was concerned, it was observed that the same did not tilt the matter in favour of the Respondent. There were no documents placed on record to establish the assertions of the Respondent.

3.5 The Director (Discipline) in his Prima Facie Opinion dated 11th August 2020 opined that the Respondent was Guilty of Professional and Other Misconduct falling within the meaning of Item (7) of Part – I of the Second Schedule and Item (2) of Part-IV of First Schedule to the Chartered Accountants Act, 1949. The said Item(s) of the Schedule to the Act, states as under:

Item (7) of Part I of Second Schedule

"A chartered accountant in practice shall be deemed to be guilty of professional misconduct if he:

(7) does not exercise due diligence or is grossly negligent in the conduct of his professional duties."

Item (2) of Part IV of First Schedule:

"A member of the Institute, whether in practice or not, shall be deemed to be guilty of other misconduct, if he:

(2) in the opinion of the Council, brings disrepute to the profession or the Institute as a result of his action whether or not related to his professional work."

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3.6 The Prima Facie Opinion formed by Director (Discipline) was considered by the Disciplinary Committee at its meeting held on 07th April 2021. The Committee on consideration of the same, concurred with the reasons given against the charges and thus, agreed with the prima facie opinion of the Director (Discipline) that the Respondent is prima facie **GUILTY** of Professional and Other Misconduct falling within the meaning of Item (7) of Part I of the Second Schedule and Item (2) of Part IV of First Schedule to the Chartered Accountants Act, 1949 and accordingly, decided to proceed further under Chapter V of the Chartered Accountants (Procedure of Investigations of Professional and Other Misconduct and Conduct of Cases) Rules, 2007. The Committee also directed the Directorate that in terms of the provisions of sub-rule (2) of Rule 18, the prima facie opinion formed by the Director (Discipline) be sent to the Respondent including particulars or documents relied upon by the Director (Discipline), if any, during the course of formation of prima facie opinion and the Respondent be asked to submit his Written Statement in terms of the provisions of the aforesaid Rules.

4. **Date(s) of Written submissions/Pleadings by parties:**

The relevant details of the filing of documents in the instant case by the parties are given below:

S. No.	Particulars	Dated
1.	Date of 'Information Letter'	10 th July 2018
2.	Date of Written Statement filed by the Respondent	06 th August 2018
3.	Date of Prima facie Opinion formed by Director (Discipline)	11 th August 2020
4.	Date of Written Submissions filed by the Respondent after PFO	18 th August 2021

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5. Written submissions filed by the Respondent:

- 5.1** The Respondent vide letter dated 18th August 2021 filed his submissions stating that he was not professionally associated with the Financial Statements that were presented by the Informant department in the present matter. It was a clear case of forgery and fabrication of documents done by the borrower group i.e., Vikram Seth group, who had raised the finances from Bank of Baroda by using the name of Respondent and defrauded the concerned Bank. The Respondent added that proceedings of the criminal case were going on in various courts.
- 5.2** The Respondent further submitted that signatures and stamps on all documents presented by CBI along with their information, claiming them to have been signed by the Respondent, were forged and fabricated. The fraudsters who forged the signatures of the Respondent, did not even know the full official name of the Respondent. That his name, mentioned in the fabricated documents, was 'Ravinder Gulati' whereas the Respondent's official name was 'Ravinder Kumar'.
- 5.3** That the affidavit filed by the Respondent with ICAI on 13th March 1990, was misunderstood by the Director (Discipline), because it was read in isolation, disregarding other documents which were part of the set of documents. There was also a Form 18 filed by the Respondent with ICAI declaring setting up of his CA practice from 01-04-1990. In the said Form 18, three names were suggested, for obtaining approval of firm name where the first name sought to be approved was 'Ravinder Gulati & Associates'. But the firm name as proposed, was not approved because the official name of the Respondent did not contain the surname 'Gulati'. At that time, when it was explained that the surname of the Respondent was 'Gulati', he was suggested to file an affidavit to this effect, and it was only for this purpose that the said affidavit was filed. The Director (Discipline) mistook that the Respondent changed his name to 'Ravinder Gulati'. The Respondent argued that for changing the name, publication in gazette etc. was necessary and the affidavit had a very limited purpose of asserting the surname of the Respondent for obtaining the intended firm name. The affidavit did not state

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the name as 'Ravinder Gulati' (as used in the forged documents); it was 'Ravinder Kumar Gulati'.

- 5.4** The Respondent further stated that the very first time, he came to know about the fraud was when a call was received by him from the Chief Manager Bank of Baroda, Phagwara Branch on 20th June 2013 asking for confirmation of audit of certain Financial Statements. At that time, the Respondent replied in negative and reached at the Bank on the same day and gave in writing that the Respondent never attested any of the 15 sets of Financial Statements narrated in the letter while also stating that the signatures were forged, and the address and stamp were also not correct. Further, the Bank had never asked for the Respondent's confirmation before sanctioning any loan to the alleged entities. In this regard, once the letter of denial was collected from the Respondent, the Bank swung into action and controlling authorities were informed and eventually, the matter reached at CBI. Therefore, it was the Respondent who helped the Bank to realize the fraud played on them. Further, finding fault with the Respondent for not filing a police complaint, without realizing the reasons for the same, was a reflection of a premediated approach.
- 5.5** The Respondent further submitted that the Bank, being the affected party, had filed the police complaint in 2013 itself after Respondent's denial letter. In addition, another person, who was affected by the fraud, had filed a complaint with police in 2013 as his immovable property was fraudulently mortgaged. The Respondent became the prosecution witness in both cases. In this context, there was no need for another police complaint for the sake of one, in that context. The Respondent had consulted the local police station, and they informed him that there was no need for a separate police complaint, in view of the two cases already filed with the police.
- 5.6** The Respondent further referred to his statement as a witness in the Case No 5970/2013 - State vs Subhash Chander and Case No 5935/2013 - State vs Bikram Seth & Others, which were being adjudicated in the Court of Sub Divisional Judicial Magistrate.

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5.7 Further, the self-contained note of CBI, forming part of the Information, stated that the Respondent had denied that he conducted any audit of the parties covered by the case, vide letter dated 20th June 2013 sent to Bank of Baroda. The fact was that the letter dated 20th June 2013 was obtained by CBI from the Bank. Had the CBI not obtained this letter from the Bank, the CBI would not have taken the denial by the Respondent before them in the statement.

5.8 The Respondent further submitted that he had denied all the contentious documents and asserted that he had not attested any of them in his statement given before CBI dated 13th June 2016. He further added that CBI had not made him an accused in the case.

5.9 The Respondent further added that the Enforcement Directorate had attached properties of several crores of rupees of Mr. Vikram Seth's family who perpetrated this fraud and the reports in the public domain confirmed that they had forged documents to raise Bank finances. Also, the term 'purportedly' used by the CBI to qualify the contentious documents, was to indicate that it was just a claim of the bank that the documents were attested by the Respondent.

6. **Brief facts of the Proceedings:**

6.1 The details of the hearing(s) fixed and held/adjourned in said matter is given as under:

Particulars	Date of meeting(s)	Status
1 st time	22 nd May, 2023	Adjourned at the request of the Respondent
2 nd time	16 th October 2023	Part heard and adjourned
3 rd time	28 th November 2023	Part heard and adjourned
4 th time	22 nd January 2024	Hearing concluded and decision taken

6.2 On the day of first hearing on 22nd May 2023, the Committee noted that the Respondent vide email dated 19th May 2023 sought adjournment on the

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ground that he required additional time for preparation of the case. Acceding to the request of the Respondent, the Committee adjourned the matter to a future date so as to provide one more opportunity to the Respondent to defend the charges.

6.3 On the day of next hearing on 16th October 2023, the Committee noted that the Respondent along with his Counsel, were present through Video conferencing mode. Thereafter, the Respondent was put on oath and the Committee enquired from him as to whether he was aware of the charges as contained in Para 2 above and the same were also read out. On the same, the Respondent replied that he was aware about the charges and pleaded 'Not Guilty' to the charges levelled against him. Thereafter, in the absence of the Complainant and in view of Rule 18(9) of the Chartered Accountants (Procedure of Investigation of Professional and Other Misconduct and Conduct of Cases) Rules, 2007, the Committee adjourned the case to a later date. Accordingly, the matter was part heard and adjourned.

6.4 On the day of next hearing on 28th November 2023, the Committee noted that the Respondent along with his Counsel, were present through Video conferencing mode. The Committee asked the Respondent's Counsel to present his submissions. The Counsel for the Respondent submitted that vide letter dated 20th June 2013, the Respondent had informed the bank that he had not signed the financial statements / documents of the entities mentioned in this matter. Further, the proceedings in this case, were also going before the Court at Phagwara, Punjab and the Respondent had made three depositions before the Court as a witness and in his statement, he had submitted before the Court that he was not signatory to the alleged documents. Further, the person who forged his signature, did not know his name. The Respondent always used his name as 'Ravinder Kumar' and not as 'Ravinder Gulati'. Moreover, CBI in its investigation report, had noted that the Respondent had denied his signatures and his involvement in this matter vide letter dated 20.06.2013 addressed to bank. After recording the submissions of Counsel for the Respondent, the Committee adjourned the case to a later date. Accordingly, the matter was part heard and adjourned.

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6.5 On the day of final hearing on 22nd January 2024, the Committee noted that the Respondent along with his Counsel, were present through Video conferencing mode. The Committee asked the Respondent's Counsel to present his submissions. The Counsel for the Respondent submitted that a letter sent by the Respondent to the Banker on 20th June 2013 was on record, wherein the Respondent had denied having attested any of the documents submitted to the Bank. The Respondent's Counsel further submitted that CBI had acknowledged the fact that the Respondent had denied having attested any of the alleged documents in his letter dated 20th June 2013. Further, the Respondent had become a prosecution witness in two cases. The Respondent's Counsel further submitted that since the amount involved was huge and the bank officials were involved, investigation by Anti-Corruption Bureau started in year 2015 and the Respondent's statement was recorded in June 2016. The Respondent's Counsel further submitted that the Bank's role was to file a complaint and forensic examination was the responsibility of the investigating agency. The Counsel for Respondent further submitted that the Respondent had firmly established that there was no credible evidence on record that could be relied upon to substantiate the charges against the Respondent. The Informant Department had failed to provide any substantial evidence. The Respondent's proactive actions, as chronologically explained, further support his innocence.

6.6 After detailed deliberations, and on consideration of the facts of the case, various documents / material on record as well as the oral and written submissions, the Committee concluded the hearing in the instant case.

7. **Findings of the Committee:**

7.1 The Committee thoroughly examined the charges levelled against the Respondent, that he was associated with certain entities viz., M/s B K Enterprises, M/s B S Publishers, M/s V S Enterprises, M/s P K Enterprises, M/s Subhash Singh & Co., M/s Meek Enterprises, M/s M K Traders, M/s Unique Traders, and M/s U R Enterprises and had certified their financial statements or tax audit reports or filed certain other documents viz., Form VAT15, Form VAT20 etc. for certain period. The Committee noted that the

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Respondent has denied of having any association with any of these entities for the relevant period. One of the main pleas taken by the Respondent was that his name was 'Ravinder Kumar' while the name which was mentioned in the alleged documents was 'Ravinder Gulati'. At the outset, the Committee noted the Respondent's assertions that it was a case of mistaken identity / impersonation and that he was never involved in the alleged matter pertaining to the subject entities. The Committee also observed that its role, being a quasi-judicial authority, was to regulate the conduct of its members by inquiry into the alleged professional and/or other misconduct within the framework of the Chartered Accountants Act 1949 based on arguments / evidence produced before it. Consequently, the Committee was of the view that the preliminary issue to be dealt with in the present matter, was the impersonation or mistaken identity of the Respondent without going into merits of the case. In this context, the Committee considered the Respondent's submission that he came to know about the said fraud for the very first time on 20.06.2013 on receiving a call from the Bank taking his confirmation on audit of certain financial statements. The Committee also took note of the Respondent's submission that he gave in writing to the bank that he never attested the alleged documents. The Committee examined the letter dated 20.06.2013 addressed by the Respondent to the Chief Manager, Bank of Baroda, Phagwara. In the said letter, the Respondent, while referring to the telephonic talks made with the Bank on the even date, had confirmed that he had neither prepared nor conducted the audit of the subject entities. The Respondent, in this letter, also asserted that the signatures and stamp as appended on the alleged balance sheets, were forged, and had also disowned his liability as the advances were given to the subject entities by the bank without verifying the alleged documents / balance sheets from his office. The Committee then examined the 'Self Contained Note' of the Informant Department. The Committee observed that the Informant Department itself acknowledged the Respondent's explicit denial of conducting the audit for the relevant period in a letter dated 20.06.2013, addressed to the Chief Manager of Bank of Baroda, Phagwara. Upon thorough examination of both the Respondent's submissions and the 'Self Contained Note,' the Committee observed that the inclusion of the reference

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to the letter dated 20.06.2013 in the Informant Department's document further reinforces the Respondent's stance of disassociating himself from the subject entities since he first became aware of them. The Committee was of the view that this strengthened the credibility of the Respondent's claim regarding his non-involvement with the subject entities from the beginning.

7.2 Furthermore, the Committee noted that the Respondent, in his statement dated 13.06.2016 given before the Informant Department, had also denied of attesting any document related to the subject entities. In this context, the Committee considered the observations of the Director (Discipline) given in his prima facie opinion that the signatures and the address of the Respondent on the documents with ICAI and that placed on record by the Informant Department, were observed to be different after examining the documents received from the M&SS Department of ICAI.

7.3 The Committee also took note of the Respondent's submissions that after he wrote a letter dated 20.06.2013 to the Bank denying his association with the subject entities and informed them that it was a case of forgery / impersonation, the Bank being the affected party, had filed the police complaint in 2013 itself. In addition, another person, who was affected by the said fraud, had also filed a complaint with police during Year 2013 and the Respondent became the prosecution witness in both cases. The Committee examined those statements of the Respondent which he had given in Case No. CHI-5935-2013 and CHI-5970-2013 in the Hon'ble Court of PCS, SDJM, Phagwara, Punjab as a prosecution witness (PW-6 and PW-8). The Committee observed that these statements provided by the Respondent further strengthened his submissions of not having any association with the subject entities. Furthermore, the Committee examined the self-contained note of the Informant Department, which initially raised the allegations against the Respondent, asserting that the contentious documents of the subject entities were purportedly signed or certified by the Respondent. The Committee analyzed this assertion, emphasizing the principle that the initial onus to prove allegations always rests with the party raising them. The Committee observed that it was the duty of the Informant Department to

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produce evidence in support of the allegations levelled against the Respondent and also to establish that the person who had signed the impugned documents, was the Respondent, in the absence of which, no liability could be foisted on any person. The Committee observed that there was no concrete evidence which could establish the Respondent's involvement in signing or certifying the contentious documents.

7.4 On overall consideration of various submissions, and material on record, the Committee observed that there were several points that strengthened the Respondent's denial of having any association with the subject entities for the relevant period. Firstly, the Committee noted the significant distinction in names, with the Respondent being identified as 'Ravinder Kumar' while the alleged documents bear the name 'Ravinder Gulati.' The Committee was of the view that this discrepancy serves as an important factor in favour of the Respondent, disowning the certification of the documents by him. Moreover, the Committee placed substantial emphasis on the letter dated 20.06.2013, addressed by the Respondent to the Chief Manager of Bank of Baroda, Phagwara which reflected pro-active initiation of actions taken by the Respondent to rebut the allegations and informing them of his non-involvement in such fraud. In this correspondence, the Respondent clearly denied the preparing or conducting the audit of the subject entities, pointing out that the signatures and stamp on the alleged balance sheets were forged. The Committee finds this written confirmation crucial in establishing the Respondent's early disassociation from the subject entities and the alleged fraudulent activities associated with them. Additionally, the Committee observed that the Bank, as the affected party, filed a police complaint in 2013, and another affected person also lodged a complaint during the same year. Significantly, the Respondent became a prosecution witness in both cases, further corroborating his claim of being not associated with the subject entities. Furthermore, the Committee noted the absence of concrete evidence provided by the Informant Department to substantiate its allegations against the Respondent.

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7.5 The Committee observed that in the instant case, the Informant Department had merely named the Respondent based on the inputs of the Bank concerned; and it had neither identified the Respondent with evidence for his alleged involvement in fraud nor investigated the role of the Respondent in such matters. The Committee was of the view that for proper appreciation of the matter, sufficient documentary evidence was required to corroborate the role of the Respondent against the allegations levelled. Thus, in view of the fact that the identity of the Respondent, being the same person, as referred in the Note of CBI, could not be established and CBI also did not produce any evidence or document to substantiate the charges levelled against the Respondent, the Committee observed that the benefit of doubt must be extended to the Respondent in this matter. Accordingly, the Committee held the Respondent **NOT GUILTY** of Professional and Other Misconduct falling within the meaning of Item (7) of Part I of the Second Schedule and Item (2) of Part IV of the First Schedule to the Chartered Accountants Act, 1949.

8. **Conclusion**

In the view of the findings states in the above paras, vis-a vis material on record, the Committee gives its charge wise findings as under: -

Charges (as per PFO)	Findings	Decision of the Committee
Para 2.1 to Para 2.9 as above	Para 7.1 to 7.5 as above	NOT GUILTY – Item (7) of Part I of the Second Schedule and Item (2) of Part IV of the First Schedule

9. In view of the above observations, considering the submissions of the Respondent and documents on record, the Committee held the Respondent **NOT GUILTY** of Professional and Other Misconduct falling within the meaning of Item (7) of Part I of the Second Schedule and Item (2) of Part IV of the First Schedule to the Chartered Accountants Act, 1949.

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10. Order

Accordingly, in terms of Rule 19(2) of the Chartered Accountants (Procedure of Investigations of Professional and Other Misconduct and Conduct of Cases) Rules, 2007, the Committee passes an Order for closure of this case against the Respondent.

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Sd/-

(CA. RANJEET KUMAR AGARWAL)
PRESIDING OFFICER

Sd/-

(SHRI JIWESH NANDAN, I.A.S. {RETD.})
GOVERNMENT NOMINEE

Sd/-

(MS. DAKSHITA DAS, I.R.A.S. {RETD.})
GOVERNMENT NOMINEE

Sd/-

(CA. MANGESH P KINARE)
MEMBER

Sd/-

(CA. COTHA S SRINIVAS)
MEMBER

DATE: 05.02.2024

PLACE: NEW DELHI

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Certified to be true copy



निशा शर्मा / Nisha Sharma
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