



**GOVERNMENT OF INDIA
MINISTRY OF CORPORATE AFFAIRS**

ROC Ahmedabad

Registrar Of Companies, ROC Bhavan , Opp Rupal Park Society, Behind Ankur Bus Stop, Naranpura, Ahmedabad, Gujarat,
India, 380013

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Order ID: PO/ADJ/04-2025/AD/00250

Dated: 14/05/2025

ORDER FOR ADJUDICATION OF PENALTY UNDER SECTION 454 OF THE COMPANIES ACT, 2013 ('THE ACT') FOR VIOLATION OF SECTION 117(2) OF THE COMPANIES ACT, 2013.

A. Appointment of Adjudicating Officer:

Ministry of Corporate Affairs vide its Gazette notification number S.O. 831(E) dated 24/03/2015 appointed undersigned as Adjudicating Officer in exercise of the powers conferred by section 454 of the Companies Act, 2013 [herein after known as Act] read with Companies (Adjudication of Penalties) Rules, 2014 for adjudging penalties under the provisions of this Act..

B. Company details: In the matter relating to BMRAJ INDUSTRIES PRIVATE LIMITED [herein after known as Company] bearing CIN U25209DN2017PTC005516, is a company registered with this office under the Provisions of the Companies Act, 2013/1956 having its registered office situated at SRV NO .113/2/4& 5, PLOT NO. 4 & 5 66 KVA ROAD, TIRUPATI INDL.ESTATE, AMLI SRV NO .113/2/4& 5, PLOT NO. 4 & 5 66 KVA ROAD, TIRUPATI INDL.ESTATE, AMLI NA SILVASSA DADRA & NAGAR HAVELI Dadra & Nagar Haveli India

Individual details:

In the matter relating to BHUMIRAJ SURMA HEMENDRASINH [herein after known as individual] having DIN 07762973 and having its address at ASHIRWAD PLOT NO.38,VRUNDAVAN PARK,SILVASSA ASHIRWAD PLOT NO.38,VRUNDAVAN PARK,SILVASSA SILVASSA Dadra & Nagar Haveli India

In the matter relating to DIPIKABEN SURMA HEMENDRASINH [herein after known as individual] having DIN 07762978 and having its address at ASHIRWAD PLOT NO.38,VRUNDAVAN PARK SILVASSA ASHIRWAD PLOT NO.38,VRUNDAVAN PARK SILVASSA SILVASSA Dadra & Nagar Haveli India

In the matter relating to HEMENDRASINH CHANDRASINH SURMA [herein after known as individual] having DIN 09213841 and having its address at ASHIRWAD PLOT NO.38,VRUNDAVAN PARK, ASHIRWAD PLOT NO.38,VRUNDAVAN PARK, SILVASSA Dadra & Nagar Haveli India

C. Provisions of the Act: (2) If any company fails to file the resolution or the agreement under sub-section (1) before the expiry of the period specified therein, such company shall be liable to a penalty of ten thousand rupees and in case of continuing failure, with a further penalty of one hundred rupees for each day after the first during which such failure continues, subject to a maximum of two lakh rupees and every officer of the company who is in default including liquidator of the company, if any, shall be liable to a penalty of ten thousand rupees and in case of continuing failure, with a further penalty of one hundred rupees for each day after the first during which such failure continues, subject to a maximum of fifty thousand rupees.

D. Facts about the case:

1. Default committed by the officers in default/noticee - This office has received physical application on 13.01.2025 from company under Section 454 of the Act, the company has submitted that the company has passed the special resolution in the Annual General Meeting of its members held on 7th September 2019 under Section 62(3) of the Companies Act, 2013 read with the rules made thereunder. The Subject matter of the said special resolution was to take the prior approval of the members to convert the loan to be received from the directors Mr. Dipika H. Sharma, Mr. Bhumiraj Surma and their relative Mr. Hemendra Surma into fully paidup Equity Shares with voting rights in future with their consent. As per the provisions of the Section 117 of the Act, the said resolution is required to file within 30days of the passing via e-form MGT-14. However, e-Form MGT-14 was filed vide SRN AB2305574 on 01/01/2025 delayed by 1943 days.

In view of the above, Adjudication proceedings are being initiated under Section 454 of the Act for non-compliance of Section 117 of the Act.

2. Not applicable

E. Order:

1. Reason for imposition of penalty, to be entered manually

2. The details of penalty imposed on the company, officers in default and others are shown in the table below:

(A)	Name of person on whom penalty imposed (B)	Rectification of Default required (C)	Penalty Amount (D)	Additional Penalty (E) (*Per day of continuing default i.e. date of rectification of default less order issue date)	Maximum limit for Penalty (F)
1	BMRAJ INDUSTRIES PRIVATE LIMITED having CIN as U25209DN2017P TC005516		100000	0	200000
2	BHUMIRAJ SURMA HEMENDRASINH having DIN as 07762973		25000	0	50000
3	DIPIKABEN SURMA HEMENDRASINH having DIN as 07762978		25000	0	50000
4	HEMENDRASINH CHANDRASINH SURMA having DIN as 09213841		25000	0	50000



3. The notified officers in default/noticee shall rectify the default mentioned above and pay the penalty, so applicable within 90 days of receipt of the order.
4. The notified officers in default/noticee shall pay the penalty amount via 'e-Adjudication' facility which can be accessed through the respective login IDs on the website of Ministry of Corporate Affairs and upload the copy of paid challan / SRN of e-filing (if applicable) on the 'e-Adjudication' portal itself. It is also directed that the penalty so imposed upon the officers in default shall be paid from their personal sources/income.
5. Appeal against this order may be filed in writing with the Regional Director, RD Ahmedabad within a period of sixty days from the date of receipt of this order, in Form ADJ setting for the grounds of appeal and shall be accompanied by a certified copy of this order [Section 454 (5) & 454 (6) of the Act, read with Companies (Adjudication of Penalties) Rules, 2014].
6. For penal consequences of non-payment of penalty within the prescribed time limit, please refer Section 454(8) of the Companies Act, 2013.

Keerthi Narayana,
Registrar of Companies
ROC Ahmedabad

To,

1. BMRAJ INDUSTRIES PRIVATE LIMITED, SRV NO .113/2/4& 5, PLOT NO. 4 & 5 66 KVA ROAD, TIRUPATI
INDL.ESTATE, AMLI SRV NO .113/2/4& 5, PLOT NO. 4 & 5 66 KVA ROAD, TIRUPATI INDL.ESTATE, AMLI SILVASSA
DADRA & NAGAR HAVELI Dadra & Nagar Haveli India , ceo@bmraj.co.in

2. BHUMIRAJ SURMA HEMENDRASINH, ASHIRWAD PLOT NO.38,VRUNDAVAN PARK,SILVASSA ASHIRWAD PLOT
NO.38,VRUNDAVAN PARK,SILVASSA SILVASSA Dadra & Nagar Haveli India , director@bmraj.co.in

3. DIPIKABEN SURMA HEMENDRASINH, ASHIRWAD PLOT NO.38,VRUNDAVAN PARK SILVASSA ASHIRWAD PLOT
NO.38,VRUNDAVAN PARK SILVASSA SILVASSA Dadra & Nagar Haveli India , ceo@bmraj.co.in

4. HEMENDRASINH CHANDRASINH SURMA, ASHIRWAD PLOT NO.38,VRUNDAVAN PARK, ASHIRWAD PLOT
NO.38,VRUNDAVAN PARK, SILVASSA Dadra & Nagar Haveli India , hcsurma@gmail.com