



**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

Phone: 079-27438531

E-mail: roc.ahmedabad@mca.gov.in

Order ID: PO/ADJ/07-2025/AD/00517

Dated: 25/07/2025

ORDER FOR ADJUDICATION OF PENALTY UNDER SECTION 454 OF THE COMPANIES ACT, 2013 ('THE ACT') FOR VIOLATION OF SECTION 450 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 GUJARAT PEANUT AND AGRI PRODUCTS LIMITED [herein after known as Company] bearing CIN U15490GJ2005PLC046918, is a company registered with this office under the Provisions of the Companies Act, 2013/1956 having its registered office situated at D - 402, IMPERIAL HEIGHTS, OPP. BIG BAZAR, 150 FEET RING ROAD, D - 402, IMPERIAL HEIGHTS, OPP. BIG BAZAR, 150 FEET RING ROAD, NA RAJKOT Gujarat India 360005

Individual details:

In the matter relating to JEETKUMAR BHAVESHBHAI RAYCHURA [herein after known as individual] having DIN 08197824 and having its address at JEET, 9/10 LAXMIWADI CORNER, LAXMIWADI, RAJKOT JEET, 9/10 LAXMIWADI CORNER, LAXMIWADI, RAJKOT RAJKOT Gujarat India 360002

In the matter relating to MAYABEN DAMJIBHAI KANTARIYA [herein after known as individual] having PAN EVSPK9165B and having its address at MARUTI NANDAN, BODIGHODI MARUTI NANDAN, BODIGHODI Paddhari Rajkot Gujarat India 360110

In the matter relating to ARUNKUMAR NATVARLAL CHAG [herein after known as individual] having DIN 02190698 and having its address at VRAJ BHUMI, BLOCK NO. 25, VRAJ BHUMI, BLOCK NO. 25, RAJKOT GUJARAT India 360001

In the matter relating to SAGAR ARUNKUMAR CHAG [herein after known as individual] having DIN 02192020 and having its address at VRAJ BHUMI, BLOCK NO. 25 VRAJ BHUMI, BLOCK NO. 25 RAJKOT Gujarat India 360001

C. Provisions of the Act:

If a company or any officer of a company or any other person contravenes any of the provisions of this Act or the rules made thereunder, or any condition, limitation or restriction subject to which any approval, sanction, consent, confirmation, recognition, direction or exemption in relation to any matter has been accorded, given or granted, and for which no penalty or punishment is provided elsewhere in this Act, the company and every officer of the company who is in default or such other person shall be liable to a penalty of ten thousand rupees, and in case of continuing contravention, with a further penalty of one thousand rupees for each day after the first during which the contravention continues, subject to a maximum of two lakh rupees in case of a company and fifty thousand rupees in case of an officer who is in default or any other person]

D. Facts about the case:

1. Default committed by the officers in default/noticee - The company and Mr. Arunkumar Natvarlal Chag have submitted joint application for non-compliance of Section 4 of the Companies Act, 2013. The Applicant submitted in application that the company altered its MOA by passing Special Resolution in EOGM dated 07.03.2019 wherein Other objects deleted. However, the company kept on carrying on the business of activities which earlier fall under other objects. The newly appointed company secretary and CFO identified the unintentional omission of main object and not having appropriate object in its main objects due to amendment made in MOA in 2019. Accordingly at EOGM dated 23.08.2024, a special resolution was passed by the applicant company to clearly articulate the main object that has been missed. The Applicant Company subsequently filed the e-form MGT-14 for the alteration of MOA and ROC, upon review issued the certificate of registration of the special resolution confirming alteration of object clause u/s 13(1) of the Companies Act, 2013 on 07 September 2024. Accordingly there was default period from 07.03.2019 to 06.09.2024 as the company has carried up the business that were not authorised by the MOA of the Company. Accordingly the company and Officers at the period of default have violated the provisions of Section 4(1)(c) of the Companies Act, 2013 for not having appropriate object for a period of 2011 days.
2. Upon request received from company, hearing was fixed on 28.05.2025 and 11.06.2025. PCS Shri Gouri Shanker Mishra attended the hearing and submitted that Mr. Jeetkumar Bhaveshbhai Raychura, CS and Ms. Mayaben Damjibhai Kantariya, CFO, cannot and should not be considered as officers in default as they have they joined the company on 5th July 2024 and they were not KMP at the time of initiation of default. They identified and resolved the non-compliance within 30 days of their appointment by placing the said matter before the Board on 12th August 2024

E.Order:

1. Pursuant to Ministry General Circular 1/2020 dated 02.03.2020, the company and JEETKUMAR BHAVESHBHAI RAYCHURA , MAYABEN DAMJIBHAI KANTARIYA, ARUNKUMAR NATVARLAL CHAG and SAGAR ARUNKUMAR CHAG are liable to be penalized under Section 450 read with Section 2(60) of the Companies Act, 2013. Accordingly below penalty is being levy :
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	GUJARAT PEANUT AND AGRI PRODUCTS LIMITED having CIN as U15490GJ2005P LC046918		200000	0	200000
2	JEETKUMAR BHAVESHBHAI RAYCHURA having DIN as 08197824		50000	0	50000
3	MAYABEN DAMJIBHAI KANTARIYA having PAN as EVSPK9165B		50000	0	50000
4	ARUNKUMAR NATVARLAL CHAG having DIN as 02190698		50000	0	50000
5	SAGAR ARUNKUMAR CHAG having DIN as 02192020		50000	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.



Signature Not Verified

Digitally signed by
DS REGISTRAR OF COMPANIES
GUJARAT DADRA AND NAGAR
HAVELI 1
Date: 2025.07.25 19:14:01 IST

Keerthi Narayana,
Registrar of Companies
ROC Ahmedabad

To,

1. GUJARAT PEANUT AND AGRI PRODUCTS LIMITED, D - 402, IMPERIAL HEIGHTS, OPP. BIG BAZAR, 150 FEET RING ROAD, D - 402, IMPERIAL HEIGHTS, OPP. BIG BAZAR, 150 FEET RING ROAD, RAJKOT Gujarat India 360005, gujaratpeanutpro@gmail.com

2. JEETKUMAR BHAVESHBHAI RAYCHURA, JEET, 9/10 LAXMIWADI CORNER, LAXMIWADI, RAJKOT JEET, 9/10 LAXMIWADI CORNER, LAXMIWADI, RAJKOT RAJKOT Gujarat India 360002, csjeetkumar@gmail.com

3. MAYABEN DAMJIBHAI KANTARIYA, MARUTI NANDAN, BODIGHODI MARUTI NANDAN, BODIGHODI Paddhari Rajkot Gujarat India 360110, cfo@gujaratpeanut.com

4. ARUNKUMAR NATVARLAL CHAG, VRAJ BHUMI, BLOCK NO. 25, VRAJ BHUMI, BLOCK NO. 25, RAJKOT GUJARAT India 360001, arun@sagarintl.com

5. SAGAR ARUNKUMAR CHAG, VRAJ BHUMI, BLOCK NO. 25 VRAJ BHUMI, BLOCK NO. 25 RAJKOT Gujarat India 360001, sagar@sagarintl.com