

Citation: 2025 BCSECCOM 66

Settlement Agreement

Anish Sunderji and First Globe Capital International Inc.

Securities Act, RSBC 1996, c. 418 (the Act)

- ¶ 1 The Executive Director of the British Columbia Securities Commission (the Executive Director), First Globe Capital International Inc. (First Globe) and Anish Sunderji (Sunderji) agree as follows:

Agreed Statement of Facts

Background

1. Sunderji, a resident of Vancouver, British Columbia, is the sole shareholder, officer and director of First Globe, which was incorporated in British Columbia in 2004.
2. Neither First Globe nor Sunderji were registered under the Act during the relevant period.
3. First Globe provided services to British Columbia and Ontario-based issuer clients including:
 - (a) introducing issuer clients to First Globe's network of fund managers, money managers, institutional and retail investors (**First Globe's Clients**);
 - (b) conducting regular outreach to new and existing investors to introduce issuer clients;
 - (c) arranging overseas trips for issuer clients to meet First Globe's Clients;
 - (d) facilitating overseas road shows for issuer clients;
 - (e) arranging one on one meetings between the issuer clients and First Globe Clients to continue dialogue initiated at road shows, outreaches or through introductions; and
 - (f) coordinating communications between First Globe's Clients and issuer clients through regular conference calls.

Misconduct

4. From July 2019 to October 2020 (the Relevant Period), First Globe and Sunderji referred investors to six listed issuers who distributed securities in private placements. The investors First Globe referred invested a total of \$4,657,794 in the

different financings and the issuers paid First Globe finder's fees totaling \$211,384 as compensation.

5. As a result of referring the investors to the issuers and accepting finders fees, First Globe engaged in the business of trading in securities without registration, contrary to section 34(a) of the Act.
6. Sunderji authorized or permitted First Globe's contravention of section 34(a) of the Act and therefore also contravened that same provision by virtue of section 168.2 of the Act.

Facts relevant to settlement

7. First Globe and Sunderji made admissions with respect to their misconduct prior to the issuance of a Notice of Hearing.
8. Neither First Globe, nor Sunderji, has any prior history of securities regulatory misconduct before or since the relevant period.
9. The evidence obtained by the Executive Director did not indicate that the misconduct resulted in any loss for investors.

Undertaking

10. First Globe and Sunderji undertake to jointly and severally pay \$120,000 to the British Columbia Securities Commission in respect of settlement of this matter.

Public Interest

11. In light of all of the circumstances, including the undertakings, it is not in the public interest for the Executive Director to issue orders under section 161 of the Act.

Waiver

12. First Globe and Sunderji waive any right they may have, under the Act or otherwise, to a hearing, hearing and review, judicial review or appeal related to, in connection with, or incidental to this settlement.

Counterpart

13. This Settlement Agreement may be signed in counterpart and all such counterparts of signed copies, whether delivered electronically or otherwise, shall be read or construed together as if they formed one originally executed document.

¶ 2 February , 2025

¶ 3 Anish Sunderji
Anish Sunderji

Redacted)
Witness Signature)
Redacted)
Witness Name (please print))
Redacted)
Redacted)
Address)
Redacted)
Occupation)

¶ 4 February , 2025

¶ 5 Anish Sunderji
First Globe Capital International Inc.
(Per Anish Sunderji
Signing Authority)

Redacted)
Witness Signature)
Redacted)
Witness Name (please print))
Redacted)
Redacted)
Address)
Redacted)
Occupation)

Peter J Brady
3/5/2025 | 8:20 AM PST

¶ 6 Peter J. Brady
Executive Director