

## SECURITIES AND EXCHANGE BOARD OF INDIA

## ORDER

**DIRECTIONS UNDER SECTIONS 11 AND 11B OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992 IN THE MATTER OF TRADING IN THE SCRIPS OF PIPAVAV DEFENCE AND OFFSHORE ENG. LIMITED, PARSVNATH DEVELOPERS LIMITED, TULIP TELECOM LIMITED AND GLODYNE TECHNOSERVE LIMITED ON JULY 26, 2012.**

1. On July 26, 2012, Securities and Exchange Board of India (SEBI) noticed a downward movement in prices of certain scrips as compared to their closing prices on July 25, 2012 at the National Stock Exchange of India (NSE) and Bombay Stock Exchange Limited (BSE). The percentage of such price variation in those scrips at NSE and BSE was noted as under:

*Table 1: Price variation*

<i>Scrip</i>	<i>% price variation</i>	
	<i>BSE</i>	<i>NSE</i>
Pipavav Defence and Offshore Eng. Ltd.	-19.96	-19.99
Parsvnath Developers Ltd	-19.91	- 19.93
Tulip Telecom Ltd.	- 25.97	- 26.02
Glodyne Technoserve Ltd.	- 19.98	- 19.99

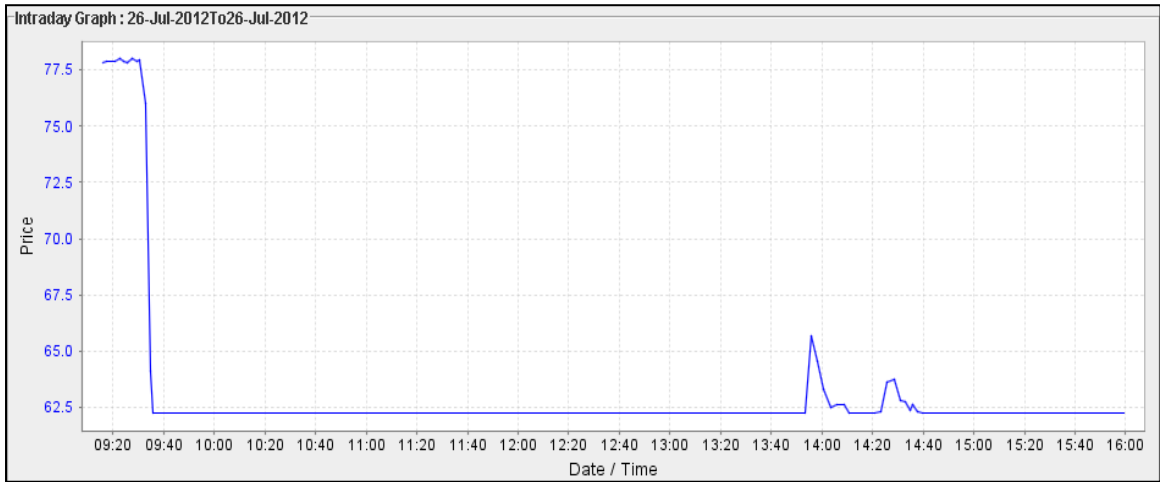
2. It is noted that the prices of the above scrips had seen a sharp downward movement within the time from 09:15 to 09:49 on July 26, 2012 as enumerated below.

*Table 2: Time Slots of price fall*

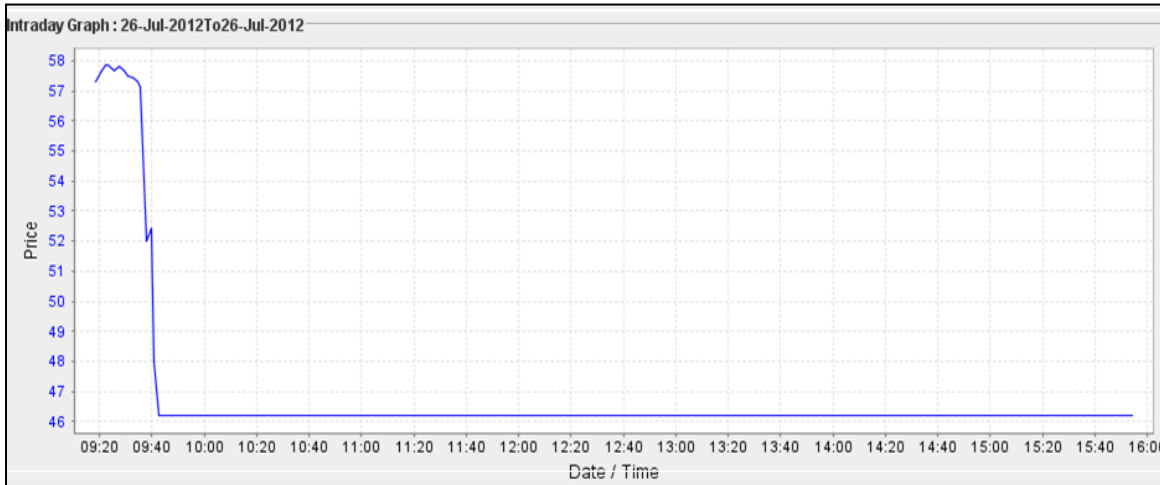
<i>Scrip</i>	<i>Time Slot (NSE)</i>	<i>Time Slot (BSE)</i>
Pipavav Defence and Offshore Eng. Ltd.	09:15 to 09:35	09:32:35 to 09:35:15
Parsvnath Developers Ltd.	9:35:47 to 9:42:47	09:36:06 to 09:41:20
Tulip Telecom Ltd.	9:40:00 to 9:49:00	09:32:30 to 09:47:32
Glodyne Technoserve Ltd.	09:15:09 to 09:29:51	09:15:54 to 09:23:45

3. During 15 days prior to July 26, 2012, no corporate announcements/price sensitive information was disclosed to the stock exchanges by the aforesaid companies which could have impacted the share prices negatively. However, on July 26,2012, at NSE and BSE both similar sharp intra-day price volume movement in the above scrips was observed. For illustration, the intra-day price volume movement of the above scrips at NSE is as follows:

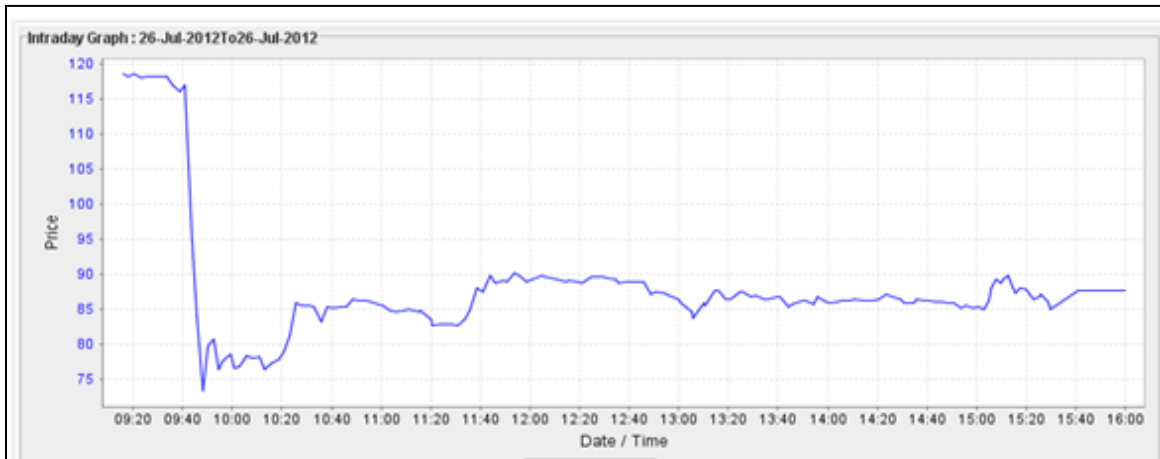
### Pipavav Defence and Offshore Eng Limited.



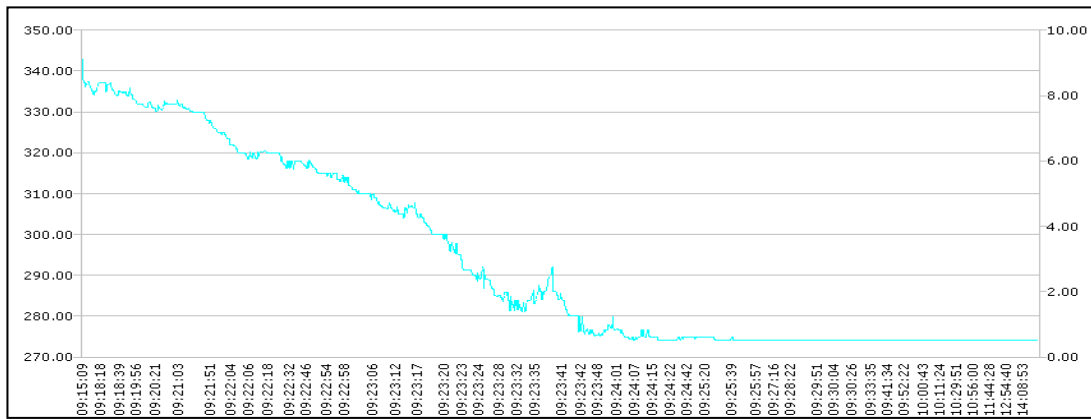
### Parsvnath Developers Limited



### Tulip Telecom Limited



### Glodyne Technoserve Limited.



4. The trading activity of major clients on the basis of net sell at NSE and BSE on July 26, 2012 (during the price fall period) in aforesaid scrips was analyzed by NSE and BSE, respectively. It was observed that some of these clients were not only common across the above scrips but they also traded on both the exchanges. The top identified clients whose sell volume constituted a significant share of the total sale transactions in those scrips at NSE and BSE during the price fall period are as under:

**Table 3: Top net sellers during the price fall period**

<i>Exchange</i>	<i>Client Name</i>	<i>Client PAN</i>	<i>Net Sell quantity</i>	<i>% to market Net</i>
<b>Pipavav Defence and Offshore Eng. Limited</b>				
NSE	Manish Agarwal	APLPA3819B	151,843	38.37
NSE	Umang Nemani	ABOPN7213K	145,165	36.68
NSE	Narayan Sriram Investments Pvt Ltd	AAACN1115A	50,000	12.63
BSE	Manish Agarwal	APLPA3819B	199309	33.58
BSE	Umang Nemani	ABOPN7213K	50000	8.43
<b>Parsvnath Developers Limited</b>				
NSE	Gajria Jayna Precision Industries Pvt Ltd	AABCG5915E	158557	51.15
NSE	Manish Agarwal	APLPA3819B	100000	32.26
NSE	Neelanchal Mercantile Pvt Ltd	AAACN8842N	20000	6.45
NSE	Kuvam Plast Private Limited	AADCK8653K	17799	5.74
BSE	Ravinder Shroff	AAUPS0285M	35002	16.46
BSE	Neelanchal Mercantile Pvt Ltd	AAACN8842N	20000	9.4
BSE	Manish Agarwal	APLPA3819B	11208	5.27
<b>Glodyne Technoserve Limited</b>				
NSE	Umang Nemani	ABOPN7213K	25000	37.21
NSE	Ramkripa Securities Pvt Ltd	AADCR3436K	10292	15.32
NSE	Yashika Holding Pvt. Ltd.	AAACY0171H	10000	14.89
NSE	Littlestar Vanijya Private Limited	AABCL2630H	10000	14.89
NSE	White Horse Trading Company Private Limited	AAACW8451G	4064	6.05
BSE	Ramkripa Securities Pvt Ltd	AADCR3436K	21100	53.35
BSE	Umang Nemani	ABOPN7213K	2081	5.26

<i>Exchange</i>	<i>Client Name</i>	<i>Client PAN</i>	<i>Net Sell quantity</i>	<i>% to market Net</i>
<b>Tulip Telecom Limited</b>				
NSE	Ajit Kumar Jain	ACNPJ9264G	200000	25.46
NSE	Passion System Solutions Private Limited	AAECP3609F	113000	14.39
NSE	Gajria Jayna Precision Industries Pvt Ltd	AABCG5915E	90000	11.46
BSE	Ajit Kumar Jain	ACNPJ9264G	90000	28.14
BSE	Manish Agarwal	APLPA3819B	50000	15.63

5. From the above table, it is observed that the net sell by the above mentioned top clients during the price fall period in each scrip was in the range of 51% to 95% of total market net sell at NSE and 31% to 58% of total market net sell at BSE.
6. The observations of the analysis carried out by the NSE and BSE in these scrips are described in the following paragraphs.
7. **Observations with regard to Pipavav Defence and Offshore Eng Limited**

**a. Observations of NSE**

- i. During the day, client Mr. Manish Agarwal placed 11 sell orders (all limit orders) with original sell volumes ranging between 735 and 300,000 shares and disclosed volumes ranging from fully disclosed to partly disclosed. During the period between 9:15:00 to 9:35:00, it was observed that he had placed 4 sell limit orders ranging between -2.84% and 0.15% of the Last Traded Price (LTP), each with original volume of 50,000 shares with disclosed quantity of 5000 shares.
- ii. Mr. Manish Agarwal trading through Nirmal Bang Securities Private Limited sold 1.51 Lac Shares during 9:32:15 AM - 9:34:53 AM which accounted 14.84% of gross market sale and 44.61% of net market sale. Price of the scrip moved in the range of Rs. 77.75 to Rs. 63.60 and his trades were executed in the price range of Rs. 77.75 to Rs. 65.00.
- iii. During the day, Mr. Umang Nemani placed 5 sell orders (all limit orders) with original sell volumes ranging between 50,000 and 200,000 shares and the orders were fully disclosed. During the period between 9:15:00 to 9:35:00, it was observed that he had placed 2 sell limit order ranging between -1.23% and -4.15% of the LTP with original volumes ranging between 50000 to 100000 shares and the orders were fully disclosed.
- iv. Mr. Umang Nemani trading through Kotak Securities Ltd. net sold 1.45 lac shares during 9:34:06 AM - 9:34:59 AM which accounted 18.01% of gross market sale and 48.26% of net market sale. Price of the scrip moved in the range of Rs. 69.80 to Rs. 63.60 and his trades were executed in the price range of Rs. 69.80 to Rs. 64.00.

**b. Observations of BSE**

- i. Mr. Manish Agarwal trading through Nirmal Bang Securities Pvt. Ltd. sold 1.99 Lac shares during 09:33:06 AM to 09:34:45 AM which accounted for 33.58% of the total market volume. Price of the scrip moved in the range of Rs.77.65 to Rs.62.15 and his trades were executed in the price range of Rs.75.75 to Rs.65.
- ii. Mr. Umang Nemani trading through Kotak Securities Limited sold 50000 shares during 09:34:45 AM to 09:34:53 AM which accounted 8.43% of total market volume. Price of the scrip moved in the range of Rs.77.65 to Rs.62.15 and his trades were executed in the price range of Rs.65 to Rs.64.

## **8. Observations with regard to Parsvnath Developers Ltd.**

### **a. Observations of NSE**

- i. Mr. Neelanchal Mercantile Pvt. Ltd. trading through IFCI Financial Services Limited had placed 3 sell orders (2 limit orders and 1 market order) with original sell volumes ranging between 8985 and 15000 shares and with entire quantity disclosed. It was observed that all orders were placed during the time patch 9:35:47 and 9:42:47.
- ii. Mr. Neelanchal Mercantile Pvt Ltd trading through IFCI Financial Services Limited sold 20,000 shares during 9:36:46 AM to 9:39:09 AM which accounted 9.64% of gross market sale and 31.86% of net market sale. Price of the scrip moved in the range of Rs.55.00 to Rs.48.05 and this client trades were executed in the price range of Rs.53.75 to Rs. 48.05.
- iii. Mr. Gajria Jayna Precision Industries Pvt. Ltd. trading through Edelweiss Securities Limited had placed 3 sell orders (all market orders) with original sell volumes ranging between 40,000 and 174,000 shares (entire volume of 174,000 was fully disclosed). It was observed that all sell orders were placed during the time patch 09:38:36 AM to 09:40:37 AM.
- iv. Mr. Gajria Jayna Precision Industries Pvt Ltd trading through Edelweiss Securities Limited sold 1.58 Lac shares during 9:39:34 AM to 9:40:39 AM which accounted 32.95% of gross market sale and 84.96% of net market sale. Price of the scrip moved in the range of Rs.53.35 to Rs.46.20 and his trades were executed in the price range of Rs.53.00 to Rs. 46.20.
- v. Mr. Manish Agarwal trading through Nirmal Bang Securities Pvt Ltd had placed 2 sell orders (all limit orders) with original sell volume of 100,000 shares per order and with entire quantity disclosed. Out of these 2 orders during the time patch 09:41:01 AM to 09:44:56 AM, first order was placed with sell order level LTP variation of -4.74%.
- vi. Mr. Manish Agarwal trading through Nirmal Bang Securities Limited sold 1 Lac shares during 9:41:01 AM to 9:41:45 AM which accounted 49.43% of gross market sale and 100% of net market sale. Price of the scrip moved in the range of Rs.48.05 to Rs.46.20 and his trades were executed in the price range of Rs.48.05 to Rs. 46.20.
- vii. Kuvam Plast Private Limited trading through Kaynet Finance Limited sold 17,799 shares during 9:40:05 AM to 9:40:42 AM which accounted 10.92% of

gross market sale and 27.84% of net market sale. Price of the scrip moved in the range of Rs.52.05 to Rs.46.20 and this client trades were executed in the price range of Rs.52.00 to Rs.49.00.

**b. Observations of BSE**

- i. Neelanchal Mercantile Pvt. Ltd. trading through IFCI Financial Services Limited sold 20,000 shares during 09:36:44 AM to 09:39:08 AM which accounted 9.40% of gross market sale. Price of the scrip moved in the range of Rs. 57.30 to Rs. 46.25 and this client trades were executed in the price range of Rs. 54.35 to Rs. 50.
- ii. Mr. Manish Agarwal trading through Nirmal Bang Securities Pvt. Ltd. sold 11,208 shares at 09:41:20 AM which accounted 5.27% of gross market sale Price of the scrip moved in the range of Rs. 57.30 to Rs. 46.25 and his trades were executed in the price range of Rs.46.60 to Rs. 46.25.

**9. Observations with regard to Glodyne Technoserve Limited**

**a. Observations of NSE**

- i. White Horse Trading Company Private Limited trading through Basant Securities Ltd. sold 4064 shares during 9:16:09 AM to 9:21:02 AM which accounted 19.95% of gross market sale and 63.22% of net market sale. Price of the scrip moved in the range of Rs. 337.30 to Rs. 330.10 and this client trades were executed in the price range of Rs. 337.00 to Rs. 330.50.
- ii. Yashika Holding Pvt. Ltd. trading through Basant Securities Ltd. sold 10343 shares during 9:17:03 AM to 9:24:09 AM which accounted 9.08% of gross market sale and 34.95% of net market sale. Price of the scrip moved in the range of Rs. 337.30 to Rs. 274.20 and this client trades were executed in the price range of Rs. 337.30 to Rs. 275.00.
- iii. Ramkripa Securities Pvt. Ltd. trading through A . G. Shares & Securities Ltd. sold 10292 shares during 9:22:17 AM to 9:29:46 AM which accounted 7.11% of gross market sale and 26.19% of net market sale. Price of the scrip moved in the range of Rs. 320.40 to Rs. 274.20 and this client trades were executed in the price range of Rs. 320.40 to Rs. 274.20.
- iv. Mr. Umang Nemani trading through Citigroup Global Markets India Pvt. Ltd. sold 25000 shares during 9:23:23 AM to 9:29:48 AM which accounted 16.65% of gross market sale and 48.46% of net market sale. Price of the scrip moved in the range of Rs. 293.70 to Rs. 274.20 and his trades were executed in the price range of Rs. 293.70 to Rs. 274.20.
- v. Littlestar Vanijya Private Limited trading through UPSE Securities Limited sold 10000 shares during 9:29:48 AM to 9:29:51 AM which accounted 23.92% of gross market sale and 47.85% of net market sale. Price of the scrip was at Rs. 274.20 and this client trades were executed at Rs. 274.20.
- vi. The clients Umang Nemani, Yashika Holding Pvt. Ltd. and White Horse Trading Company Private Limited contributed to the price fall by placing sale

orders at or below LTP. The following are the details of the order log analysis for the aforesaid clients:

*Table 4: Order log analysis*

<i>Client Name</i>	<i>No of Sell Limit orders placed</i>	<i>No of Sell Limit orders placed &amp; executed</i>	<i>No of Sell Limit orders placed &amp; executed at &amp; below LTP</i>	<i>Percentage order placed at or below LTP</i>	<i>Min of Order LTP%</i>	<i>Max of Order LTP%</i>
White Horse Trading Company Pvt Ltd	16	16	9	56.25%	(0.80%)	9.41%
Yashika Holding Pvt. Ltd	4	4	4	100.00%	(18.46%)	0.22%
Umang Nemani	3	1	1	100.00%	(13.77%)	0.00%

vii. Further from the analysis of order-trade data, the following were observed.

- a) During the time slot 9:16:09 AM to 9:21:02 AM White Horse Trading Company Private Limited trading through Basant Securities Ltd had placed 16 sell limit orders with original sell volumes ranging between 1 and 10,000 shares with disclosed volumes ranging between fully disclosed and 100 shares. These orders were placed at prices ranging between -0.80% and 9.41% of the LTP and out of 16 sell limit orders, 9 orders were placed at or below LTP. The client alone sold 4064 shares during 9:16:09 AM to 9:21:02 AM contributing 63.22% of net market sale.
- b) During the time slot 9:21:50 AM, to 9:24:09 AM, Yashika Holding Pvt. Ltd. trading through Basant Securities Ltd had placed 4 sell limit orders with original sell volumes ranging between 1 and 10000 shares with disclosed volumes ranging between fully disclosed and 200 shares. These orders were placed at prices ranging between -18.46% and 0.22% of the LTP and out of 4 sell limit orders, all orders were placed at or below LTP. The client sold 10,000 shares during 9:21:50 AM to 9:24:09 AM and contributing 40.46% of net market sale. The price of the scrip moved from a high of Rs.337.30 to a low of Rs.275.00.
- c) During the time slot 9:23:40 AM to 9:24:14 AM, Umang Nemani trading through Citigroup Global Markets India Pvt. Ltd. had placed 2 sell limit orders with original sell volumes ranging between 1 and 25000 shares with fully disclosed volumes. These orders were placed at prices ranging between -13.77% to 0% of the LTP and both the sell limit orders were placed at or below LTP. The client sold 4939 shares during this slot contributing 32.14% of net market sale. The price of the scrip moved from a high of Rs.293.70 to low of Rs.274.20.

**b. Observations of BSE**

- i. White Horse Trading Company Private Limited trading through Network Portfolio and Finance sold 1142 shares during 09:15:54 AM to 09:21:15 AM contributing 2.89% of gross market sale.
- ii. Ramkripa Securities Pvt. Ltd. trading through Seema Securities Pvt. Ltd. and Network Portfolio and Finance sold 21100 shares during 09:17:03 AM to 09:23:45 AM which accounted 53.34% of gross market sale. Price of the scrip moved in the range of Rs.337 to Rs.273.60 and this client trades were executed in the price range of Rs.336.05 to Rs.274.70.
- iii. Mr. Umang Nemani trading through Citigroup Global Markets sold 2081 shares during 09:23:22 AM to 09:23:33 AM which accounted 5.26% of gross market sale . Price of the scrip moved in the range of Rs.337 to Rs.273.60 and his trades were executed at Rs.292.

## **10. Observations with regard to Tulip Telecom Limited**

### **a. Observations of NSE**

- i. Mr. Ajit Kumar Jain trading through Nirmal Bang Securities Pvt. Ltd. sold 2 Lac shares during 9:41:43 AM to 9:47:32 AM which accounted 11.04% of gross market sale and 32.16% of net market sale. Price of the scrip moved in the range of Rs. 116.90 to Rs. 63.65 and his trades were executed in the price range of Rs. 116.90 to Rs. 65.00.
- ii. During the day, Mr. Ajit Kumar Jain had placed 2 sell limit orders at 9:41:43 (limit order) and 9:47:21 (market order) with sell original volume ranging between 45917 shares to 100000 shares (full disclosed quantity). The sell limit order was originally placed with sell order LTP of 5.98%. The said order was modified thrice by the client with sell LTP of ranging -18.80% to -31.62% respectively.
- iii. Mr. Manish Agarwal had placed only one sell order with at 9:35:44 with sell original volume ranging of 50000 shares. The said order was modified four times with sell order LTP ranging -1.06% to -36.58%.
- iv. Mr. Manish Agarwal trading through Nirmal Bang Securities Pvt. Ltd. sold 24,672 shares during 9:41:11 AM to 9:46:37 AM which accounted 2.41% of gross market sale and 6.63% of net market sale. Price of the scrip moved in the range of Rs. 117.00 to Rs. 76.65 and his trades were executed in the price range of Rs. 117.00 to Rs. 77.30.
- v. During the day, Gajria Jayna Precision Industries Pvt. Ltd. had placed 5 sell orders out of which 3 sell orders were placed at 9:37:08 (marker order), 9:43:35 and 9:47:50 (limit order) with sell original volume ranging between 32238 shares to 50000 shares. The sell limit orders were placed with sell order LTP ranging between -0.96% to -17.74%.
- vi. Gajria Jayna Precision Industries Pvt. Ltd. trading through Edelweiss Securities Limited sold 90,000 shares during 9:42:02 AM to 9:48:03 AM which accounted 4.26% of gross market sale and 12.61% of net market sale. Price of the scrip moved in the range of Rs. 106.10 to Rs. 63.65 and this client trades were executed in the price range of Rs. 106.00 to Rs. 71.00.



- vii. Passion System Solution Pvt. Ltd. trading through Fairwealth Securities Pvt. Ltd sold 1.13 Lac shares during 9:44:29 AM to 9:47:21 AM which accounted 8.76% of gross market sale and 25.97% of net market sale. Price of the scrip moved in the range of Rs. 87.75 to Rs. 68.20 and this client trades were executed in the price range of Rs. 86 to Rs. 72.
- viii. Kran Properties Private Limited trading through Religare Securities Ltd. sold 79,586 shares during 9:44:35 AM to 9:47:44 AM which accounted 4.99% of gross market sale and 14.80% of net market sale. Price of the scrip moved in the range of Rs. 86.50 to Rs. 63.35 and this client trades were executed in the price range of Rs. 85.25 to Rs. 70.

**b. Observations of BSE**

- i. Mr. Manish Agarwal trading through Nirmal Bang Securities Pvt. Ltd. sold 50,000 shares during 09:35:54 AM to 09:38:22 AM which accounting 15.63% of total market volume. Price of the scrip moved in the range of Rs.118.55 to Rs.65.65 and his trades were executed in the price range of Rs.116.55 to Rs.115.
- ii. Mr. Ajit Kumar Jain trading through the trading member, Nirmal Bang Securities Pvt. Ltd. sold 90,000 shares during 09:41:59 AM to 09:46:55 AM which accounted 28.14% of the total market volume. Price of the scrip moved in the range of Rs.118.55 to Rs.65.65 and his trades were executed in the price range of Rs.107 to Rs.71.40.

11. A summary of the sell orders placed by those clients on July 26,2012 is as under:

*Table 5: Summary of the sell order placement*

<i>SE</i>	<i>Client Name</i>	<i>Traded time range by client during the sub patch of time</i>	<i>Total sell order quantity placed by the client during the sub patch of time</i>	<i>Total market traded quantity during the sub patch of time</i>	<i>Total traded quantity of the client during the sub patch of time</i>	<i>% to market gross</i>	<i>Price variation range during the sub patch of time</i>	<i>Price variation by the client during the sub patch of time</i>
<b>Glodyne Technoserve Limited</b>								
BSE	Ramkripa Securities Pvt Ltd	09:17:03 to 09:23:45	89600	39554	21100	53.34	Rs.337 to Rs.273.60	Rs.336.05 to Rs.274.70
BSE	Umang Nemani	09:23:22 to 09:23:33	50000	39554	2081	5.26	Rs.337 to Rs.273.60	Rs.292 to Rs.292
BSE	White Horse Trading Company Private Limited	09:15:54 to 09:21:15	1400	39554	1142	2.89	Rs.337 to Rs.273.60	Rs.338 to Rs.332
NSE	White Horse Trading Company Private Limited	9:16:09 to 9:21:02	9658	10186	4064	19.95	Rs. 337.30 to Rs. 330.10	Rs. 337.00 to Rs. 330.50
NSE	Yashika Holding Pvt. Ltd.	9:17:03 to 9:24:09	3500	56934	10343	9.08	Rs. 337.30 to Rs. 274.20	Rs. 337.30 to Rs. 275.00

<i>SE</i>	<i>Client Name</i>	<i>Traded time range by client during the sub patch of time</i>	<i>Total sell order quantity placed by the client during the sub patch of time</i>	<i>Total market traded quantity during the sub patch of time</i>	<i>Total traded quantity of the client during the sub patch of time</i>	<i>% to market gross</i>	<i>Price variation range during the sub patch of time</i>	<i>Price variation by the client during the sub patch of time</i>
NSE	Littlestar Vanijya Private Limited	9:29:48 to 9:29:51	0	20900	10000	23.92	Rs. 274.20 to Rs. 274.20	Rs. 274.20 to Rs. 274.20
NSE	Ramkripa Securities Pvt Ltd	9:22:17 to 9:29:46	27000	72356	10292	7.11	Rs. 320.40 to Rs. 274.20	Rs. 320.40 to Rs. 274.20
NSE	Umang Nemani	9:23:23 to 9:29:48	25000	75092	25000	16.65	Rs. 293.70 to Rs. 274.20	Rs. 293.70 to Rs. 274.20
<b>Parsvnath Developers Limited</b>								
BSE	Neelanchal Mercantile Pvt Ltd	09:36:44 to 09:39:08	20000	212670	20000	9.4	Ra. 57.30 to Rs. 46.25	Rs. 52.35 to Rs. 50
BSE	Manish Agarwal	9:41:20	100000	212670	11208	5.27	Ra. 57.30 to Rs. 46.25	Rs.46.60 to Rs. 46.25
NSE	Neelanchal Mercantile Pvt Ltd	9:36:46 to 9:39:09	20000	103681	20000	9.64	Rs.55.00 to Rs. 48.05	Rs.53.75 to Rs. 48.05
NSE	Gajria Jayna Precision Industries Pvt Ltd	9:39:34 to 9:40:39	214000	240632	158557	32.95	Rs. 53.35 to Rs. 46.20	Rs. 53.00 to Rs. 46.20
NSE	Kuvam Plast Private Limited	9:40:05 to 9:40:42	20000	81501	17799	10.92	Rs. 52.05 to Rs. 46.20	Rs. 52.00 to Rs. 49.0\20
NSE	Manish Agarwal	9:41:01 to 9:41:45	100000	101160	100000	49.43	Rs. 48.05 to Rs. 46.20	Rs. 48.05 to Rs. 46.20
<b>Pipavav Defence and Offshore Eng. Limited</b>								
BSE	Manish Agarwal	09:33:06 to 09:34:45	200000	593462	199309	33.58	Rs.77.65 to Rs.62.15	Rs.75.75 to Rs.65
BSE	Umang Nemani	09:34:45 to 09:34:53	50000	593462	50000	8.43	Rs.77.65 to Rs.62.15	Rs.65 to Rs.64
NSE	Umang Nemani	9:34:06 to 9:34:59	150000	402966	145165	18.01	Rs. 69.80 to Rs. 63.60	Rs. 69.80 to Rs. 64.00
NSE	Agarwal Manish	9:32:15 to 9:34:53	200000	511711	151843	14.84	Rs. 77.75 to Rs. 63.60	Rs. 77.75 to Rs. 65.00
<b>Tulip Telecom Limited</b>								
BSE	Ajit Kumar Jain	09:41:59 to 09:46:55	90000	319803	90000	28.14	Rs.118.55 to Rs.65.65	Rs.107 to Rs.71.40
BSE	Manish Agarwal	09:35:54 to 09:38:22	50000	319803	50000	15.63	Rs.118.55 to Rs.65.65	Rs.116.55 to Rs.115
NSE	Gajria Jayna Precision Industries Pvt Ltd	9:42:02 to 9:48:03	80895	1057328	90000	4.26	Rs. 106.10 to Rs. 63.35	Rs. 106.00 to Rs. 71.00
NSE	Manish Agarwal	9:41:11 to 9:46:37	0	511515	24672	2.41	Rs. 117.00 to Rs. 76.65	Rs. 117.00 to Rs. 77.30

<i>SE</i>	<i>Client Name</i>	<i>Traded time range by client during the sub patch of time</i>	<i>Total sell order quantity placed by the client during the sub patch of time</i>	<i>Total market traded quantity during the sub patch of time</i>	<i>Total traded quantity of the client during the sub patch of time</i>	<i>% to market gross</i>	<i>Price variation range during the sub patch of time</i>	<i>Price variation by the client during the sub patch of time</i>
NSE	Ajit Kumar Jain	9:41:43 to 9:47:32	200000	906043	200000	11.04	Rs. 116.90 to Rs.63.35	Rs. 116.90 to Rs.65.00
NSE	Passion System Solution Pvt Ltd	9:44:29 to 9:47:21	50000	644955	113000	8.76	Rs. 87.75 to Rs. 68.20	Rs. 86.00 to Rs. 72.00

12. From the above table, it is observed that Mr. Umang Nemani placed sell orders in the scrip of Pipavav Defence and Offshore Eng. Ltd. after the sell orders placed by Mr. Manish Agarwal in the said scrip got executed. Similarly, Mr. Manish Agarwal placed sell orders in the scrip of Parsvnath Developers Ltd after the sell orders placed by Neelanchal Mercantile Pvt. Ltd. got executed.

13. It has also been observed that while the clients were selling during the day the entity related to them viz. Neelanchal Mercantile Pvt. Ltd. purchased a large quantity of shares of Pipavav Defence and Offshore Eng. Ltd. The details of such purchases are as under:

**Table 6: Counterparties of Neelanchal Mercantile Pvt. Ltd. in the scrip of Pipavav Defence and Offshore Eng Ltd**

<i>Client Name</i>	<i>Quantity sold</i>	<i>Total quantity sold by seller on SE</i>	<i>% of total sell</i>
<b>BSE</b>			
Premium Hospitality Services Private Limited	150000	173500	86.46
Adish Jain	87179	95000	91.77
4a Financials Securities Private Limited	80450	80450	100.00
Ajit Jain	30282	730282	4.15
Manish Agarwal	16000	516000	3.10
Venus Infosoft Limited	5000	155000	3.23
<b>NSE</b>			
Manish Agarwal	950000	1200735	79.12
Venus Infosoft Limited	283329	459148	61.71
Gajria Jayana Precision Industries Private Limited	262613	1227340	21.40
G N Credits Private Limited	235000	235000	100.00
Premium Hospitality Services Private Limited	221130	339500	65.13
Adish Jain	163000	163000	100.00
A To Z Steel Pvt Ltd	90000	241025	37.34
Umang Nemani	88146	500000	17.63
Cheminare Tradecomm Pvt Ltd	50000	422262	11.84
Milestone Shares & Stock Broking Pvt Ltd	50000	120000	41.67

<i>Client Name</i>	<i>Quantity sold</i>	<i>Total quantity sold by seller on SE</i>	<i>% of total sell</i>
Passion System Solution Pvt Ltd	26000	437228	5.95

14. The analysis of the order pattern reveals that the sell orders placed by the clients in the scrips were below the best buy or sell order price available in the exchange system at the time of either order entry or order amendment by them as brought out below:

**Table 7: Order pattern Analysis**

<i>SE</i>	<i>Client</i>	<i>PAN</i>	<i>Order type</i>	<i>Time of order entry / amendment</i>	<i>Order Volume</i>	<i>Order Price</i>	<i>Best price available at time of order entry / amendment</i>	
							<i>Best Buy</i>	<i>Best Sell</i>
<b>Glodyne Technoserve Limited</b>								
NSE	Umang Nemani	ABOPN7213K	Sell	09:23:23.266861	25000	292	293.7	293.9
BSE	Ramkripa Securities Pvt Ltd	AADCR3436K	Sell	09:17:03.728888	2000	335.05	336.05	338.75
BSE	Ramkripa Securities Pvt Ltd	AADCR3436K	Sell	09:22:03.57016	5000	320	332	325
NSE	Yashika Holding Pvt. Ltd.	AAACY0171H	Sell	09:16:58.687149	10000	320	337	337.25
NSE	Yashika Holding Pvt. Ltd.	AAACY0171H	Sell	09:21:50.951187	10000	328	328.4	328.9
NSE	Yashika Holding Pvt. Ltd.	AAACY0171H	Sell	09:22:45.851517	1000	315	318	318.9
NSE	Ramkripa Securities Pvt Ltd	AADCR3436K	Sell	09:22:53.911896	5000	315	317.55	317.95
NSE	Ramkripa Securities Pvt Ltd	AADCR3436K	Sell	09:25:38.872055	1000	274.2	274.9	275
<b>Parsvnath Developers Limited</b>								
NSE	Manish Agarwal	APLPA3819B	Sell	09:41:01.181259	100000	46.2	48.05	48.5
BSE	Neelanchal Mercantile Pvt Ltd	AAACN8842N	Sell	09:36:44.602207	10000	50	52.35	52.9
NSE	Neelanchal Mercantile Pvt Ltd	AAACN8842N	Sell	09:39:08.307755	10000	52	53.75	54
<b>Tulip Telecom Limited</b>								
BSE	Ajit Jain	ACNPJ9264G	sell	09:41:59.810502	90000	95.25	107	107.3
NSE	Ajit Jain	ACNPJ9264G	sell	09:47:21.942139	100000	70	71.85	72.7
NSE	Ajit Jain	ACNPJ9264G	sell	09:47:30.942276	54789	65	69.7	69.8
NSE	Gajria Jayna Precision Industries Pvt Ltd	AABCG5915E	sell	09:44:25.08606	40895	85	87.35	88
NSE	Gajria Jayna Precision Industries Pvt Ltd	AABCG5915E	sell	09:47:50.886978	40000	72	72.1	72.7
<b>Pipavav Defence and Offshore Eng. Limited</b>								
NSE	Umang Nemani	ABOPN7213K	sell	09:34:54.042618	50000	64	64.55	64.8

15. The above analysis reveals that the clients were instrumental in pushing the prices of the aforesaid scrips down as they were observed to be placing the sell orders below the best sell prices as well as the best buy prices available on various occasions. For instance at NSE in Pipavav Defence & Offshore Eng Limited the client Manish Agarwal entered at 9:32:35 sell order no. 2012072650203718 for 50,000 shares at Rs. 77 when the last traded price was Rs. 77.55. Client order resulted in sale of 30,279 shares in the price range of Rs. 77.60 to Rs. 77.00. For the residual 19,721 shares the client modified the original selling price of Rs. 77 twice to Rs. 70 initially and then to Rs. 65, thus bringing the price down by 15.58% in comparison to last traded price within a span of 2 minutes. Similarly, at NSE in Pipavav Defence & Offshore Eng Limited the client Umesh Nemani entered at 09:34:06 sell order no. 2012072650215729 for 1 Lac shares at Rs. 67 when the last traded price was Rs. 69.9. Client order resulted in sale of 44,651 shares in the price range of Rs. 69.80 to Rs. 67.00. For the residual 55,349 shares the client modified the original selling price to Rs. 65.
16. During the day, many entities related to the some of the clients were the top net sellers in the aforesaid scrips. The details of the top net sellers at NSE and BSE are as under:

*Table 8: Top sellers during the day*

SE	PAN	Name	Gross Buy Quantity	Gross Sell Quantity	Net traded Quantity
<b>Glodyne Technoserve Limited</b>					
BSE	AADCR3436K	Ramkripa Securities Pvt Ltd	2200	35448	-33248
BSE	BCMPP5437K	Mayoor J Purohit	0	10154	-10154
BSE	AADPI8931K	Shridhar Iyer	0	6000	-6000
BSE	ABOPN7213K	Umang Nemani	0	2081	-2081
NSE	ABOPN7213K	Umang Nemani	0	25000	-25000
NSE	AADCR3436K	Ramkripa Securities Pvt Ltd	0	23292	-23292
NSE	AABCL2630H	Littlestar Vanijya Private Limited	0	20000	-20000
NSE	AAACN1115A	Narayan Sriram Investments Pvt Ltd	0	10000	-10000
NSE	AAACY0171H	Yashika Holding Pvt. Ltd.	343	10343	-10000
NSE	AACCS4582N	Siddhesh Capital Market Services Pvt Ltd	0	9431	-9431
NSE	AAACW8451G	White Horse Trading Company Private Limited	0	4064	-4064
<b>Parsvnath Developers Limited</b>					
BSE	APLPA3819B	Manish Agarwal	0	100000	-100000
BSE	AAUPS0285M	Ravinder Kumar Shroff	2	45002	-45000
BSE	AAACN8842N	Neelanchal Mercantile Pvt Ltd	0	23630	-23630
NSE	APLPA3819B	Manish Agarwal	0	200000	-200000
NSE	AABCG5915E	Gajria Jayna Precision Industries Pvt Ltd	0	158557	-158557
NSE	ACNPJ9264G	Ajit Jain	0	100000	-100000

SE	PAN	Name	Gross Buy Quantity	Gross Sell Quantity	Net traded Quantity
NSE	AAACN8842N	Neelanchal Mercantile Pvt Ltd.	0	35000	-35000
NSE	AADCK8653K	Kuvam Plast Private Limited.	0	17799	-17799
NSE	AAF7386P	Milestone Shares & Stock Broking Pvt Ltd.	22275	32275	-10000
<b>Pipavav Defence And Offshore Eng Limited</b>					
BSE	ACNPJ9264G	Ajit Jain	0	730282	-730282
BSE	ABOPN7213K	Umang Nemani	0	550000	-550000
BSE	APLPA3819B	Manish Agarwal	0	516000	-516000
BSE	AAECP3609F	Passion System Solutions Priv	0	268449	-268449
BSE	AAACP6934D	Premium Hospitality Services Private Limited.	0	173500	-173500
BSE	AACCV5360M	Venus Infosoft Private Limited.	0	155000	-155000
BSE	AAFCS6801I	Religare Finvest Ltd	0	153000	-153000
BSE	AAACZ3020E	4a Financials Securities Private Limited	0	80450	-80450
NSE	AABCG5915E	Gajria Jayna Precision Industries Pvt Ltd	0	1227340	-1227340
NSE	APLPA3819B	Manish Agarwal	0	1200735	-1200735
NSE	AAACN1115A	Narayan Sriram Investments Pvt Ltd.	0	600000	-600000
NSE	ABOPN7213K	Umang Nemani	0	500000	-500000
NSE	AACCV5360M	Venus Infosoft Private Limited	0	459148	-459148
NSE	AAECP3609F	Passion System Solutions Private Ltd.	0	437228	-437228
NSE	AACCC1546Q	Cheminare Tradecomm Pvt Ltd.	0	422262	-422262
NSE	AFRPG4254L	Mitsu Janardan Pakvasa	0	389234	-389234
NSE	AAACP6934D	Premium Hospitality Services Private Limited	0	339500	-339500
NSE	AAACA2331D	A To Z Steel Pvt Ltd.	0	241025	-241025
<b>Tulip Telecom Limited</b>					
BSE	AACCM7105R	Merrill Lynch Capital Markets Espana SA SV	53864	214603	-160739
BSE	AABCB1518L	Bajaj Auto Finance Ltd	0	105973	-105973
BSE	AAECP3609F	Passion System Solutions Private Ltd	0	100000	-100000
BSE	AAETS9556K	IDFC Classic Equity Fund	0	94195	-94195
BSE	ACNPJ9264G	Ajit Jain	0	90000	-90000
BSE	AAACN2728F	Narayan Securities Limited	0	53056	-53056
BSE	AAACN6958M	North Eastern Publishing And Advertising Company Limited	0	50000	-50000
BSE	AAACR0021K	Rapid Credit And Holdings Private Limited	0	50000	-50000
BSE	APLPA3819B	Manish Agarwal	0	50000	-50000
BSE	AABCG5915E	Gajria Jayna Precision Industries Pvt Ltd	0	38000	-38000
NSE	AAETS9556K	IDFC Classic Equity Fund	0	375805	-375805

SE	PAN	Name	Gross Buy Quantity	Gross Sell Quantity	Net traded Quantity
NSE	AAACP6934D	Premium Hospitality Services Private Limited	18000	371000	-353000
NSE	AAACG2179F	G N Credits Private Limited	0	335000	-335000
NSE	AAECP3609F	Passion System Solutions Priv	0	271500	-271500
NSE	AABCG5915E	Gajria Jayna Precision Industries Pvt Ltd	0	245000	-245000
NSE	AAACZ3020E	4a Financials Securities Private Limited	0	214000	-214000
NSE	ACNPJ9264G	Ajit Jain	0	200000	-200000
NSE	AAHCA9621P	Ashlar Securities Private Limited	71416	231916	-160500
NSE	AACCV5360M	Venus Infosoft Private Limited	0	160000	-160000

17. The relationships as discussed below among some of the clients are derived from DWBIS system, KYC details as uploaded on the NSE/BSE, MCA databases and other publicly available sources.

**Table 9: Relationships among entities**

Name	PAN	Remarks (common links)
Neelanchal Mercantile Private Limited	AAACN8842N	<ul style="list-style-type: none"> <li>Common phone number 9831541124, 9831032277 between Neelanchal Mercantile Private Limited and Milestone Shares &amp; Stock Broking Pvt Ltd</li> <li>Neelanchal Mercantile Private Limited and Milestone Shares &amp; Stock Broking Pvt Ltd has common address 14 Princep Street,1st Floor, Nr Canara Bank, Kolkata</li> </ul>
Flex Trade Private Limited	AAACF6723A	
North Eastern Publishing & Advertising Company Limited	AAACN6958M	<p><b>Thus Neelanchal Mercantile Private Limited and Milestone Shares &amp; Stock Broking Pvt Ltd are related to each other</b></p> <ul style="list-style-type: none"> <li>Common phone number 033-22255077 between Flex Trade Private Limited, Adish Jain and Manish Agarwal.</li> </ul>
Cheminare Trade Comm Private Limited	AACCC1546Q	<ul style="list-style-type: none"> <li>Flex Trade Private Limited and Manish Agarwal. have common address 2nd Floor, Room No 205, 13, Bipin Bihari Ganguly Street, Kolkata.</li> </ul> <p><b>Thus Flex Trade Private Limited, Adish Jain and Manish Agarwal. are related to each other</b></p>
Kuvam Plast Private Limited	AADCK8653K	
Milestone Shares & Stock Broking Pvt Ltd	AAFCEM7386P	<ul style="list-style-type: none"> <li>Common phone number 9832052577 between Milestone Shares &amp; Stock Broking Private Limited, Ajit Kumar Jain and Manish Agarwal</li> </ul> <p><b>Thus Milestone Shares &amp; Stock Broking Private Limited, Ajit Kumar Jain and Manish Agarwal are related to each other</b></p>
Umang Nemani	ABOPN7213K	
Ajit Kumar Jain	ACNPJ9264G	<ul style="list-style-type: none"> <li>Common phone number 9831152460 between Ajit kumar Jain and Kuvam Plast Pvt. Ltd</li> <li>Ajit kumar Jain is also director of Kuvam Plast Pvt. Ltd</li> </ul> <p><b>Thus Ajit kumar Jain and Kuvam Plast Pvt. Ltd are related to each other</b></p>
Adish Jain	AGZPJ0317Q	
Manish Agarwal	APLPA3819B	<ul style="list-style-type: none"> <li>He is director in Mukesh Trade &amp; Finance Limited. As per MCA database the phone number of Mukesh Trade &amp; Finance Limited is 033-</li> </ul>

Name	PAN	Remarks (common links)
		<p>22306695 which is same as that of Divya Drishti traders Pvt Ltd.,</p> <ul style="list-style-type: none"> <li>• Divya Drishti Traders Pvt Ltd, Divya Drishti Merchants Pvt Ltd, Wheelers Developers Pvt Ltd share same address 163 B M G Road 3rd Floor, Kolkata- 700007</li> <li>• Divya Drishti traders Pvt Ltd, Divya Drishti Merchants Pvt Ltd, and Wheelers Developers Pvt Ltd., were debarred from trading in securities market in the matter of creation of artificial market and price manipulation in scrip of Tijaria polypipes ltd.</li> </ul> <p><b>Thus Ajit Kumar Jain appears to be related to the entities that are debarred from trading in securities market in the past.</b></p> <ul style="list-style-type: none"> <li>• One of the addresses of North Eastern Publishing &amp; Advertising Company Limited is 5 Gorky Terrace, 2nd Floor Kolkata- 700017.</li> <li>• Mr. Ajit Kumar Jain is director in various companies including Infinity Tracom Private Limited, Linkwise Agencies Private Limited which have same address 5 Gorky Terrace, 2nd Floor Kolkata- 700017 as that of North Eastern Publishing &amp; Advertising Company Limited and Kamini Finance &amp; Investment Company Limited.</li> <li>• Mr. Manish Agarwal is director in various other companies including Dove Barter Private Limited, Snowfall Tracom Private Limited, Parichay Agencies Private Limited which have same address 5 Gorky Terrace, 2nd Floor Kolkata- 700017 as that of North Eastern Publishing &amp; Advertising Company Limited and Kamini Finance &amp; Investment Company Limited</li> </ul> <p><b>Thus Ajit Kumar Jain and Manish Agarwal are related to North Eastern Publishing &amp; Advertising Company Limited</b></p> <ul style="list-style-type: none"> <li>• As per MCA database the Annual Return (AR) for the year ending 2010 has been digitally signed by a CA whose email id is <a href="mailto:ashok@steptwo.in">ashok@steptwo.in</a>.</li> <li>• Email id of Step Two Corporation Limited as per KYC details as uploaded on the NSE/BSE is <a href="mailto:admin@steptwo.in">admin@steptwo.in</a>.</li> <li>• Thus the person who had signed the AR is related to Step Two Corporation Limited.</li> </ul> <p><b>Thus Step Two Corporation Limited is related to Neelanchal Mercantile Private Limited and Milestone Shares &amp; Stock Broking Pvt Ltd</b></p> <ul style="list-style-type: none"> <li>• Umang Nemani share common addresses/phone numbers with Step Two Corporation Limited as C/o Ms Finflow Investment Pvt Ltd, A-206 Phoenix House 2nd Floor, Senapati Bapat Marg Lower Parel, Mumba-13 &amp; phone number 24982000.</li> </ul> <p><b>Thus Umang Nemani and Step Two Corporation Limited are related to each other.</b></p> <p><b>Step Two Corporation Limited is related to Neelanchal Mercantile Private Limited and Milestone Shares &amp; Stock Broking Pvt Ltd while Umang Nemai is related to Step Two Corporation Limited, Hence Umang Nemai is related to Neelanchal Mercantile Private Limited and Milestone Shares &amp; Stock Broking Pvt Ltd.</b></p> <ul style="list-style-type: none"> <li>• Common phone number and email id 9831550000,</li> </ul>



<b>Name</b>	<b>PAN</b>	<b>Remarks (common links)</b>
		<p>umang_nemani@yahoo.co.in between Cheminare Trade Comm Private Limited and Umang Nemani</p> <ul style="list-style-type: none"> <li>Nemani Umang is director in Cheminare Trade Comm Private Limited</li> <li>Further as per MCA the address of Cheminare Trade Comm Private Limited is No 9 Abhoy Guha Roadliluah,, Howrah-711204 which is same as that of Vikash Financial Services Pvt Ltd.</li> <li>Vikash Financial Services Pvt Ltd. is a shareholder in Cheminare Trade Comm Private Limited</li> <li>In Vikash Financial Services Pvt Ltd both Cheminare Trade Comm Private Limited and Flex trade Pvt Ltd are shareholders</li> </ul> <p><b>Thus Vikash Financial Services Pvt Ltd, Cheminare Trade Comm Private Limited and Flex trade Pvt Ltd, Umang Nemani are related to each other.</b></p> <p><b><i>Thus based on above entities Neelanchal Mercantile Private Limited, Flex Trade Private Limited, Kuvam Plast Private Limited, Milestone Shares &amp; Stock Broking Pvt Ltd, Ajit Kumar Jain, Cheminare Trade Comm Private Limited, Adish Jain, Nemani Umang, Step Two Corporation Limited, North Eastern Publishing and Advertising Company Limited and Manish Agarwal are related to each other</i></b></p>
A to Z Steels P Ltd	AAACA2331D	<ul style="list-style-type: none"> <li>Common phone number 9911050665, 9971099091 &amp; 01140541518 among various entities.</li> <li>Further phone number 01140541518 is common to 4a Financials Securities Private Limited.</li> <li>Common phone number 9871927842 &amp; 9810371809 between entities A To Z Steels Pvt Ltd, Premium Hospitality Services Pvt Ltd and Gajria Jayna Precision Industries Pvt Ltd.</li> <li>Common address as 203, Pankaj House, pocket Shopping Complex, sarita Vihar, Delhi- 110076 for entities A To Z Steels Pvt Ltd, Premium Hospitality Services Pvt Ltd, Gajria Jayna Precision Industries Pvt Ltd, Venus Infosoft Private Limited and Passion System Solutions Private Ltd</li> </ul> <p><b><i>Hence the entities A To Z Steels Pvt Ltd, Premium Hospitality Services Pvt Ltd, Gajria Jayna Precision Industries Pvt Ltd, Venus Infosoft Private Limited, 4a Financials Securities Private Limited, G N Credits Private Ltd and Passion System Solutions Private Ltd appear to be related to each other.</i></b></p>
G N Credits Private Ltd	AAACG2179F	
Premium Hospitality Services Private Limited	AAACP6934D	
Gajria Jayna Precision Industries Private Limited.	AABCG5915E	
4a Financials Securities Private Limited.	AAACZ3020E	
Venus Infosoft Private Limited	AACCV5360M	
Passion System Solution Private Limited	AAECP3609F	

18. Thus, it is observed that A To Z Steels Pvt Ltd, G N Credits Private Ltd, Premium Hospitality Services Pvt Ltd, 4a Financials Securities Private Limited, Gajria Jayna Precision Industries Pvt Ltd, Venus Infosoft Private Limited and Passions System Solution Private Limited are related to each other . Similarly, the entities Neelanchal Mercantile Private Limited, Flex Trade Private Limited, Kuvam Plast Private Limited, Milestone Shares & Stock Broking Pvt Ltd, Ajit Kumar Jain, Cheminare Trade Comm Private Limited, Adish Jain, Nemani Umang, Step Two Corporation Limited, North Eastern Publishing and Advertising Company Limited and Manish Agarwal are related to each other.

19. A comparison of the trading pattern with the income details captured in KYC of the clients, whose KYC records are available, reveals that for certain clients the trading pattern does not appear to be commensurate with income shown in the KYC records.

**Table 10: Trading pattern vis-à-vis Income details**

<b>Sr. No.</b>	<b>Name of the Entity</b>	<b>PAN</b>	<b>Income mentioned in KYC Form</b>	<b>Gross Trading across market from January 01, 2012 till July 25, 2012</b>
1.	Manish Agarwal	APLPA3819B	₹ 1 to ₹ 5 Lacs	₹ 490.96 Crs.
2.	Neelanchal Mercantile Pvt Ltd.	AAACN8842N	Not Mentioned	₹ 1508.35 Crs.
3.	Ramkripa Securities Pvt Ltd	AADCR3436K	Not Mentioned	₹ 93.79 Crs.
4.	Umang Nemani	ABOPN7213K	> ₹ 25 Lacs	₹ 209.42 Crs.
5.	White Horse Trading Company Private Limited	AAACW8451G	< ₹ 1 Lac	₹ 36.68 Crs.
6.	Gajria Jayna Precision Industries Pvt Ltd	AABCG5915E	Not Mentioned	₹ 170.82 Crs.
7.	Kuvam Plast Private Limited	AADCK8653K	Not Available	₹ 86.68 Crs.
8.	Littlestar Vanijya Private Limited	AABCL2630H	Not Available	₹ 36.04 Crs.
9.	Yashika Holding Pvt. Ltd.	AAACY0171H	₹ 10 to ₹ 25 Lacs	₹ 0.86 Crs.
10.	A To Z Steel Pvt Ltd	AAACA2331D	Not Mentioned	₹ 63.53 Crs.
11.	G N Credits Private Limited	AAACG2179F	Not Available	₹ 116.03 Crs.
12.	North Eastern Publishing And Advertising Company Limited	AAACN6958M	₹ 10 to ₹ 25 Lacs	₹ 271.97 Crs.
13.	Premium Hospitality Services Private Limited (As per income statement for the yr 2010-2011)	AAACP6934D	0	₹ 71.23 Crs.
14.	4A Financials Securities Private Limited	AAACZ3020E	Not Available	₹ 47.03 Crs.
15.	Cheminare Tradecomm Pvt Ltd (As per income statement for the yr 2010-2011)	AACCC1546Q	< ₹ 1 Lac	₹ 70.56 Crs.
16.	Venus Infosoft Private Limited (As per income statement for the yr 2010-2011)	AACCV5360M	0	₹ 145.36 Crs.
17.	Passion System Solutions Private Ltd.	AAECP3609F	Not Available	₹ 112.20 Crs.
18.	Ajit Kumar Jain	ACNPJ9264G	₹ 1 to ₹ 5 Lacs	₹ 426.50 Crs.

20. The concentration pattern of the clients who sold heavily in the price fall period on July 26, 2012 was also analyzed for period from January 01, 2012 till July 25, 2012. Substantial concentration of trading of these clients was observed in the four scrips viz. Pipavav Defence and Offshore Eng Ltd., Glodyne Technoserve Ltd., Tulip

Telecom Limited and Parsvnath Developers Ltd. The concentration of trading by each client in these four scrips was calculated as a percentage of their total trading in the market during January 01, 2012 till July 26, 2012 and is observed as under:

**Table 11: % concentration**

<b>Sr</b>	<b>Entity</b>	<b>% concentration in these 4 scrips</b>
1.	Yashika Holding Pvt. Ltd.	100
2.	Cheminare Tradecomm Pvt Ltd	96.78
3.	Kuvam Plast Private Limited	96.37
4.	White Horse Trading Company Private Limited	94.52
5.	North Eastern Publishing & Advertising Company Limited	94.48
6.	Ramkripa Securities Pvt Ltd	93.70
7.	Neelanchal Mercantile Pvt Ltd	90.52
8.	Manish Agarwal	86.08
9.	Umang Nemani	85.72
10.	Ajit Jain	84.73
11.	Milestone Shares & Stock Broking Pvt Ltd	81.99
12.	Gajria Jayna Precision Industries Pvt Ltd	65.25
13.	Littlestar Vanijya Private Limited	59.17
14.	4a Financials Securities Private Limited	49.08
15.	A To Z Steel Pvt Ltd	33.01
16.	G N Credits Private Limited	31.37
17.	Premium Hospitality Services Private Limited	29.76
18.	Passion System Solutions Priv	27.18
19.	Venus Infosoft Private Limited	26.23

21. I note from the aforesaid analysis of the trading pattern of the aforesaid clients during the price fall period on July 26, 2012 in the above-mentioned four scrips viz. Pipavav Defence and Offshore Eng Ltd., Glodyne Technoserve Ltd., Tulip Telecom Limited and Parsvnath Developers Ltd , that:-

- (i) Net sell volume of these clients taken together was significant ranging from 51% to 95% of total market net sell at NSE and 31% to 58% of total market net sell at BSE.
- (ii) Their sale orders of substantial quantities were mainly placed as fully disclosed orders with a view to create an impression of huge selling pressure at the time of start of the trading.
- (iii) Several times the limit orders were placed at a price significantly below the Last Traded Price (LTP) thereby bringing down the price of the scrips.
- (iv) In some of the scrips, percentage of sell quantity by identified clients during the price fall patch was significant to their total sell quantity during the day. This was in the range of 50-100%.

- (v) Prior to July 26, 2012; the trading of the some of the aforesaid clients during past 6 months was mainly concentrated in these scrips only.
22. In my view, generally, a seller would rationally seek a higher price to sell his shares; however, in this case the clients were placing sale orders at prices lower than LTP, thereby bringing down the price of the scrips. More importantly, normally a seller would desist from revealing its entire sell quantity since that may cause the supply-demand balance to immediately become unfavourable to the seller. The data for the short period of time in each scrip indicates several instances of fully disclosed orders which were also a significant factor in causing the sharp decline of approximately 20% in price of each scrip.
23. One basic premise that underlies trading on the stock exchanges is that the clients conform to standards of transparency and ethical behavior prescribed in the various regulations and statutes, relevant in this regard and do not indulge in fraudulent , manipulative and unfair trade practices while dealing in securities. In this case, the above trading pattern of the clients' prima-facie indicates that there was a concerted attempt to artificially manipulate/depress the prices of these scrips in a disorderly fashion thereby adversely affecting the integrity of the securities market.
24. Thus, from the foregoing, it appears that the aforesaid entities have *prima facie* violated section 12A of the Securities and Exchange Board of India Act, 1992, regulations 3 and 4 of the Securities and Exchange Board of India (Prohibition of the Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations 2003.
25. In the facts and circumstances narrated above, abounding in several abnormal suspicious features which otherwise are likely to pass-off as normal buy and sell transactions in the market and in the context of unprecedented price fall, traded quantity by the identified clients on July 26, 2012, there is a prima facie case for conducting a detailed investigation in the matter with respect to the role of various entities. It is noted that the trading pattern of few of the above clients along with other entities in various scrips including some of the aforesaid scrips for different periods is under examination of SEBI.
26. Protection of the market mechanism is not only the primary duty of SEBI but is also an imperative for long term stability and growth in the capital markets of the country. Further the trading pattern of the entities is prima facie found to be instrumental in depressing the prices of certain scrips at the beginning of the trading in the market on July 26, 2012. If they are allowed to continue to operate in the market, the same is fraught with danger of immense mischief and incalculable damage to the securities market besides undermining the confidence of the investors in the fairness and integrity of the market. It is, therefore, my considered opinion that immediate and urgent intervention to prevent the continuance of such operations is warranted .

27. In the light of the preliminary findings in this matter as mentioned above, I am of the view that this is a fit case where, pending detailed investigation, effective and expeditious action is required to be taken to prevent any further harm to investors and securities market and in order to protect the interest of investors and the integrity of the securities market, by way of an *ad interim ex -parte* order under sections 11 and 11B of SEBI Act, 1992.
28. I, therefore, in exercise of the powers conferred upon me by virtue of section 19 of the SEBI Act, hereby restrain the following entities from accessing the securities market and further prohibit from buying, selling or dealing in securities in any manner whatsoever, till further directions:

<b>Sr.</b>	<b>Name</b>	<b>PAN</b>
1.	4a Financials Securities Private Limited	AAACZ3020E
2.	A To Z Steels Pvt Ltd	AAACA2331D
3.	Ajit Kumar Jain	ACNPJ9264G
4.	Cheminare Trade Comm Private Limited	AACCC1546Q
5.	G N Credits Private Ltd	AAACG2179F
6.	Gajria Jayna Precision Industries Pvt Ltd	AABCG5915E
7.	Kuvam Plast Private Limited	AADCK8653K
8.	Littlestar Vanijya Private Limited	AABCL2630H
9.	Manish Agarwal	APLPA3819B
10.	Milestone Shares & Stock Broking Pvt Ltd	AAFCEM7386P
11.	Neelanchal Mercantile Private Limited	AAACN8842N
12.	North Eastern Publishing & Advertising Company Limited	AAACN6958M
13.	Passions System Solution Private Limited	AAECP3609F
14.	Premium Hospitality Services Pvt Ltd	AAACP6934D
15.	Ramkripa Securities Pvt Ltd	AADCR3436K
16.	Umang Nemani	ABOPN7213K
17.	Venus Infosoft Private Limited	AACCV5360M
18.	White Horse Trading Company Private Limited	AAACW8451G
19.	Yashika Holding Pvt. Ltd.	AAACY0171H

29. The Stock Exchanges and the Depositories are directed to ensure that the above directions are strictly enforced. SEBI shall conclude the investigations in the matter expeditiously
30. The persons/entities against whom this order is passed may file their objections, if any, within twenty one days from the date of this order and, if they so desire, avail an

opportunity of personal hearing before the Securities and Exchange Board of India, Mumbai on a date and time to be fixed on a specific request, received from the said persons.

31. This order shall come into force with immediate effect.

**DATE: August 03,2012**

**PLACE: MUMBAI**

**RAJEEV KUMAR AGARWAL  
WHOLE TIME MEMBER  
SECURITIES AND EXCHANGE BOARD OF INDIA**