

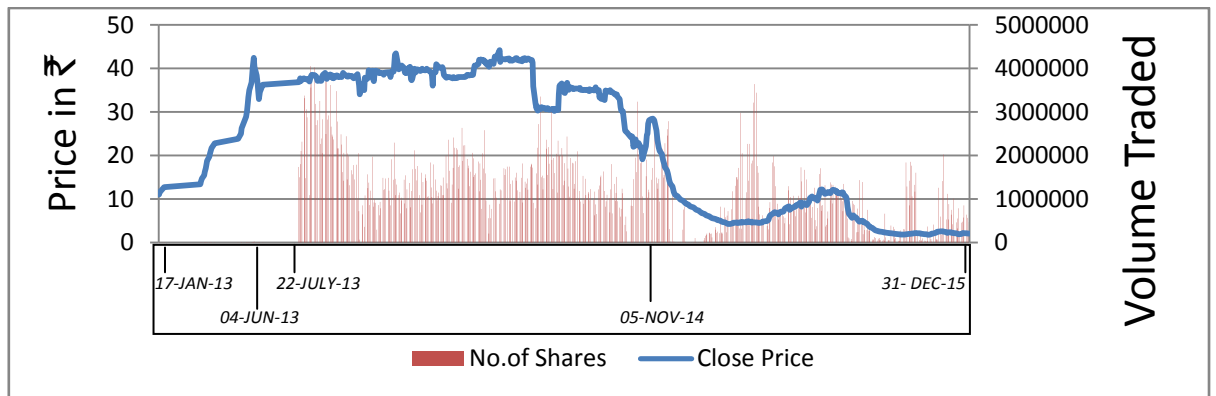
SECURITIES AND EXCHANGE BOARD OF INDIA

EX-PARTE AD-INTERIM ORDER

UNDER SECTIONS 11(1), 11(4) AND 11B OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992.

IN THE MATTER OF KAILASH AUTO FINANCE LTD.

1. SEBI noticed sudden unusual price movement and volume during the period from November 07, 2014 to December 31, 2015 in the scrip of Kailash Auto Finance Ltd. (hereinafter referred to as "*Kailash Auto*"), a company having its shares listed on the Bombay Stock Exchange Ltd. ('BSE'). SEBI undertook preliminary examination in the matter. It was observed that during November 07, 2014 to December 31, 2015, price of the scrip fell from ₹28.05/- per share to a low of ₹2.01/- per share and daily average trading volume in the scrip was 7 lakh shares. Prior to this period, during July 22, 2013 to November 05, 2014, the price of the scrip ranged between ₹36.85/- and ₹28.45/-, with daily average trading volume of 15 lakh shares with daily average number of trades of 685. Thus, substantial fall in price and average traded volume was noted during November 07, 2014 to December 31, 2015. On further scrutiny it was observed that earlier, during January 17, 2013 to June 04, 2013, the price of the scrip had increased from ₹11/- to ₹36.25/ in 36 trading days and average trading volume during this period was merely 280 shares per day with average number of trade as low as 3 per day. For the purposes of preliminary examination of facts and circumstances prevailing during these periods these periods were taken in three patches i.e., (a) January 17, 2013 to June 04, 2013 (Patch -1), (b) July 22, 2013 to November 05, 2014 (Patch-2) and (c) November 07, 2014 to December 31, 2015 (Patch -3). The price movement *vis-a-vis* traded volume in the scrip during this period is illustrated below:



*No trading from June 04, 2013 to July 21, 2013 on account of listing of new category shares of Kailash Auto.

2. During preliminary examination several acts and omissions, in connection with dealing in shares of *Kailash Auto* having a bearing on the securities market, including layering of funds, circulation of funds and securities, amongst inter -connected parties for acquisition and divestment of securities of connected unlisted private companies and corporate actions including capital reduction, issuance of bonus shares, private placement and merger of such companies with *Kailash Auto* were also observed. These activities needed examination of several aspects of interconnected transactions amongst the large number of entities. As a part of preliminary examination, the bank statement of the concerned suspected entities for the relevant period were analysed. The data and information available in public domain such as Ministry of Corporate Affairs ("MCA") website, BSE website and other databases had to be gathered and examined. During the course of examination, *Kailash Auto*, Registrar to Issue and Share Transfer Agent of *Kailash Auto*, and suspected entities who had been holding shares in concerned private unlisted companies were also asked to provide information relevant to the matter. However, no satisfactory response were provided by these entities.
3. SEBI had also advised BSE to conduct surprise inspection at the registered office of *Kailash auto* to determine, *inter alia*, the following:
 - (a). Whether the company exists at the registered office/corporate office;
 - (b). Whether any operations of the company are conducted at the said address.
4. BSE conducted a surprise inspection at the registered office of *Kailash Auto* (i.e., '19, Rollant Complex, 37/17, The Mall, Kanpur, Uttar Pradesh – 208 001') and reported that the said premises was occupied by a chartered accountant firm - M/s Ajay Kedia & Associates and only one office boy of *Kailash Auto* was available at the time of site visit. On further inquiry, it was learnt that the said chartered accountant firm had given *Kailash Auto* a small table space in its office for collecting posts, couriers, and other documents received in the name of the company for which one office boy Mr. Atul Verma was appointed. BSE conducted inspection at corporate office of *Kailash Auto* (i.e., 'Room no. 10, Ground Floor, Rajsheela Premises Co-op Society Ltd., Building no. 597, J.S.S. Road, Mumbai – 400 002') also and reported that the claimed corporate office was locked and no company officials were available at the time of visit of BSE officials at that address. Thus, it was gathered that no operation was carried out by *Kailash Auto* at the said registered office/corporate office addresses.
5. The preliminary examination, *inter alia*, further revealed that:
 - (a). With effect from November 19, 2012 the management and control of *Kailash Auto* was acquired by Careful Projects Advisory Ltd. (hereinafter referred to as "CPAL") and Panchshul Marketing Ltd. (hereinafter referred to as "PML") who had together acquired shares amounting to 69.81% of the total paid-up share capital of the company from

Padma Impex Ltd., the erstwhile promoter of *Kailash Auto* through a share purchase agreement dated May 02, 2012. Consequently, the board of directors of *Kailash Auto* had approved *CPAL* and *PML* as promoters of *Kailash Auto*.

- (b). On November 22, 2012, the board of directors of *Kailash Auto* had agreed for reduction of share capital of *Kailash Auto* and merger of *CPAL* and *PML* with *Kailash Auto*. The scheme of reduction of share capital of *Kailash Auto* and amalgamation of *CPAL* and *PML* with it were approved by the Hon'ble High Court of Allahabad and the Hon'ble High Court Bombay vide separate orders dated May 9, 2013 and May 10, 2013, respectively. The swap ratio for the amalgamation was approved as follows:
- (i) The paid up value per share of the transferee company (*Kailash Auto*) would be of ₹ 1/- each, fully paid up post reduction of capital.
 - (ii) The paid up value per share in the transferor companies (*CPAL* and *PML*) would be of ₹ 1/- each, fully paid up.
 - (iii) Accordingly, for every equity share of ₹1/- held by the shareholders of *CPAL* and *PML*, one equity share of ₹1/- of *Kailash Auto* (post reduction of capital) was to be allotted to them as fully paid-up in the equity share capital of the company.
- (c). Pursuant to the scheme of reduction of capital approved by the Hon'ble High Court, the paid-up share capital of *Kailash Auto* of ₹3,80,59,000/- consisting of 38,05,900 equity shares of ₹10/- each was reduced to ₹38,05,900/- consisting of 38,05,900 equity shares of ₹1/- each. Consequently, the paid up share capital was reduced by 90%. Further, pursuant to amalgamation of *CPAL* and *PML* with *Kailash Auto*, additional 58,59,10,800 equity shares of ₹1/- each amounting ₹58,59,10,800/- were issued to shareholders of *CPAL* and *PML* as consideration. Total 26,56,617 equity shares of ₹1/- held by *CPAL* and *PML* were cancelled due to crossholding.
- (d). *CPAL* and *PML* were incorporated as private limited companies with share capital ₹1,00,000/- each, consisting of 10,000 equity shares of ₹10/- each on September 15, 2010 and September 19, 2010, respectively.
- (e). During Financial Year 2010-11, *CPAL* had made private placement of its 3,30,155 equity shares of face value ₹10/- each at the share premium of ₹590/- each to 13 entities (hereinafter referred to as the '*primary allottees of CPAL*') and purportedly raised a share premium of ₹19,47,91,450/- within a short time of its incorporation. However, *Kailash Auto* has submitted to SEBI a list of 13 entities claiming to have allotted 33,01,550 equity shares of face value ₹1/- each to the said entities as mentioned in following Table :

Table 1- List of primary allottees of CPAL

Date	Name of Allottees	Shares Allotted (Face value-₹1)
31/03/2011	Confident Vanijya Pvt. Ltd.	1,46,600
31/03/2011	Dhankuber dealcomm Pvt. Ltd.	1,21,600
31/03/2011	Gannayak Sales Pvt. Ltd.	1,58,300
31/03/2011	Heaven Sales Pvt. Ltd.	3,15,000
31/03/2011	Intecity Complex Consultants Pvt. Ltd.	1,41,600
31/03/2011	Manikaran Dealtrade Pvt. Ltd.	3,40,000
31/03/2011	Needful Projects Advisory Pvt. Ltd.	4,05,000
31/03/2011	Panchshul Marketing Pvt. Ltd.	7,65,250
31/03/2011	Pushapmala Vinimay Pvt. Ltd.	3,45,000
31/03/2011	Shivratri Merchants Pvt. Ltd.	83,300
31/03/2011	Solty Dealtrade Pvt. Ltd.	1,58,300
31/03/2011	Speedwell Enclave Consultancy Pvt. Ltd.	1,73,300
31/03/2011	Timeless Suppliers Pvt. Ltd.	1,48,300
Total		33,01,550

- (f). During the Financial Year 2011-12, CPAL had a paid up share capital of ₹285,686,800/- consisting of 285,686,800 shares of ₹1/- each. CPAL had increased its authorised share capital from ₹3,450,000/- to ₹290,000,000/- and then its shares were split from ₹10/- each to ₹1/- each, thereby converting 340,155 equity shares of ₹10/- each into 3,401,550 equity shares of ₹1/- each.
- (g). Thereafter, during the same financial year, CPAL had issued 187,085,250 equity shares of ₹1/- each as bonus shares in the ratio of 55 shares for 1 share and further issued 95,200,000 equity shares of ₹1/- each through private placement. The list of the persons who received bonus shares, and persons who were allotted shares in this private placement amongst others (hereinafter referred to as the "recipients of CPAL shares") is given in the following Table:

Table 2- List of recipients of CPAL Shares

Date	Name of Allottees	Corporate Action	Shares Allotted
31/07/2011	Sudhir Jain	Bonus Issue	2750000
31/07/2011	Rohit Agarwal	Bonus Issue	2750000
31/07/2011	Anand Sagar Thakur	Bonus Issue	2750000
31/07/2011	Rudra Prasad Banerjee	Bonus Issue	2750000
31/07/2011	Trump Traders Pvt. Ltd.	Bonus Issue	41882500
31/07/2011	Shivling Mercantile Pvt. Ltd.	Bonus Issue	45369500
31/07/2011	Shivratri Tradelinks Pvt. Ltd.	Bonus Issue	44181500

31/07/2011	Jatadhari Marketing Pvt. Ltd.	Bonus Issue	44651750
14/03/2012	Jatadhari Marketing Pvt. Ltd.	Private Placement	25600000
14/03/2012	Stepan Commotrade Pvt. Ltd.	Private Placement	18500000
14/03/2012	Shivratri Tradelinks Pvt. Ltd.	Private Placement	25000000
14/03/2012	Trump Traders Pvt. Ltd.	Private Placement	26100000
Total			282285250

- (h). As observed from the balance sheet of *Kailash Auto* for Financial Year 2011-12, the aforesaid *recipients of CPAL shares* were its existing shareholders prior to bonus issue as well the private placement. The *primary allottees of CPAL* were the only shareholders as there was no other issuance of shares after the first private placement and before the bonus issue and second private placement. This implies that the aforesaid *recipients of CPAL shares* had become shareholders of *CPAL* on purchase of shares from the *primary allottees of CPAL* before the bonus issue and second private placement.
- (i). Similarly, *PML* had made private placement of 3,36,900 equity shares of face value ₹10/- each at a premium of ₹690/- each during the Financial Year 2010-11 to 15 entities (hereinafter referred to as "*primary allottees of PML*") and purportedly raised a share premium of ₹23,24,61,000/- within short time of its incorporation. The list of *primary allottees of PML* is mentioned in following Table:

Table 3- List of primary allottees of PML

Date	Name of Allottees	Shares Allotted (Face value-₹10)
31/03/2011	Confident Vanijya Pvt. Ltd.	20,200
31/03/2011	Dhandevi Merchandise Pvt. Ltd.	54,800
31/03/2011	Fairlink Realtors Consultants Pvt. Ltd.	21,500
31/03/2011	Intecity Complex Consultants Pvt. Ltd.	14,350
31/03/2011	Luckydhan Dealtrade Pvt. Ltd.	30,800
31/03/2011	Mahadhan Vincom Pvt. Ltd.	31,250
31/03/2011	Pushpdant Tradelink Pvt. Ltd.	13,500
31/03/2011	Pushpdhara Dealer Pvt. Ltd.	46,000
31/03/2011	Pushpmala Vinimay Pvt. Ltd.	12,700
31/03/2011	Ranpriya Tradevin Pvt. Ltd.	40,500
31/03/2011	Safeline Developers Advisory Pvt. Ltd.	8,500
31/03/2011	Saptrishi Agencies Pvt. Ltd.	9,400
31/03/2011	Speedwell Enclave Consultancy Pvt. Ltd.	5,600
31/03/2011	Superdeal Vincom Pvt. Ltd.	7,800
31/03/2011	Timeless Suppliers Pvt. Ltd.	20,000
Total		3,36,900

- (j). During the Financial Year 2011-12, *PML* had a paid up share capital of ₹300,224,000/- consisting of 30,02,24,000 shares of ₹1/- each. *PML* had increased its authorised share capital from ₹1,00,00,000/- to ₹31,00,00,000/- and then its shares were split from ₹10/- each to ₹1/- each, thereby converting 3,46,900 equity shares of ₹10/- each into 34,69,000 equity shares of ₹1/- each.
- (k). Thereafter, during Financial Year 2011-12, *PML* had issued 225,485,000 equity shares of ₹1/- each as bonus shares in the ratio of 65 shares for 1 share and further issued 7,12,70,000 equity shares of ₹1/- each through private placement. The list of the persons who received bonus shares and persons who were allotted shares in this private placement (hereinafter referred to as the "*recipients of PML shares*") is given in the following Table:

Table 4- List of recipients of PML shares

Date	Name of Allottees	Corporate Action	Shares Allotted
15/09/2011	Binod Kumar Toshniwal	Bonus Issue	3250000
15/09/2011	Hanish Toshniwal	Bonus Issue	3250000
15/09/2011	Santosh Sharma	Bonus Issue	3250000
15/09/2011	Anand Thakur Sagar	Bonus Issue	59475000
15/09/2011	Needful Vincom Pvt. Ltd.	Bonus Issue	53040000
15/09/2011	Brijdhara Merchantile Pvt. Ltd.	Bonus Issue	53560000
15/09/2011	Overflow Mercandise Pvt. Ltd.	Bonus Issue	49660000
16/03/2012	Sanskriti Vincom Pvt. Ltd.	Private Placement	25000000
16/03/2012	Shivling Mercantile Pvt. Ltd.	Private Placement	28000000
16/03/2012	Overall Vincom Pvt. Ltd.	Private Placement	18270000
Total			296755000

- (l). The bonus shares are issued by a company to its existing shareholders and as observed from the balance sheet of *Kailash Auto* for Financial Year 2011-12, the aforesaid *recipients of PML shares* were its existing shareholders prior to bonus issue, and, amongst others, recipients in the private placement by *PML*. This implies that the *primary allottees of PML* had transferred their shareholding in *PML* to the aforesaid *recipients of PML shares* before the bonus issue and private placement.
- (m). *CPAL* and *PML* had cumulatively issued 57,90,40,250 equity shares of ₹1/- each to *recipients of CPAL shares* and *recipients of PML shares* through bonus issue and private placements.
- (n). The *primary allottees of CPAL* and *PML* are connected to each other on the basis common addresses and/or common directors. A list of such connected *primary allottees* alongwith the bases of connection is enumerated in the following Tables:

Table - 5 - Common addresses of primary allottees of CPAL and PML

<i>primary allottees of PML</i>	<i>primary allottees of CPAL</i>	Common address
1. Confident Vanijya Pvt. Ltd.	1. Confident Vanijya Pvt. Ltd.	40, Burtolla Street, 1st Floor, Kolkata-700007
2. Dhandevi Merchandise Pvt. Ltd. 3. Luckydhan Dealtrade Pvt. Ltd. 4. Saptrishi Agencies Pvt. Ltd. 5. Superdeal Vincom Pvt. Ltd.	2. Dhankuber Dealcomm Pvt. Ltd. 3. Manikaran Dealtrade Pvt. Ltd.	52, Weston Street, 4th Floor, Kolkata- 700012
6. Fairlink Realtors Consultants Pvt. Ltd. 7. Intecity Complex Consultants Pvt. Ltd 8. Safeline Developers Advisory Pvt. Ltd.	4. Needful Projects Advisory Pvt. Ltd. 5. Solty Dealtrade Pvt. Ltd.	8, Netaji Subhash Road, Kolkata-700001
9. Mahadhan Vincom Pvt. Ltd. 10. Pushpmala Vinimay Pvt. Ltd.	6. Panchshul Marketing Pvt. Ltd. 7. Shivratri Merchants Pvt. Ltd. 8. Pushapmala Vinimay Pvt. Ltd.	310, C.R. Avenue, Kolkata-700006
11. Pushpdant Tradelink Pvt. Ltd.	9. Gannayak Sales Pvt. Ltd.	9/12, Lal Bazar Street, 3rd Floor, Kolkata -700001
12. Pushpdhara Dealer Pvt. Ltd. 13. Speedwell Enclave Consultancy Pvt. Ltd. 14. Timeless Suppliers Pvt. Ltd.	10. Speedwell Enclave Consultancy Pvt. Ltd. 11. Timeless Suppliers Pvt. Ltd.	26, W.C. Banerjee Street, Near Girish Park, Kolkata-700006

Table - 6 Common directors of primary allottees of CPAL and PML

Common Directors	<i>primary allottees of PML</i>	<i>primary allottees of CPAL</i>
Hanish Toshniwal	Confident Vanijya Pvt. Ltd.	Heaven Sales Pvt. Ltd.
Mrityunjoy Sarkar	Pushpdhara Dealer Pvt. Ltd.	Needful Projects Advisory Pvt. Ltd.
		Shivratri Merchants Pvt. Ltd.
Pradeep Shaw	Dhandevi Merchandise Pvt. Ltd.	Dhankuber Dealcomm Pvt. Ltd.
	Safeline Develoeprs Advisory Pvt.Ltd.	
	Saptrishi Agencies Pvt. Ltd.	
Sintu Kumar	Superdeal Vincom Pvt. Ltd.	Solty Dealtrade Pvt. Ltd.
	Timeless Suppliers Pvt. Ltd.	
Sumanta Banerjee	Pushpdhara Dealer Pvt. Ltd.	Shivratri Merchants Pvt. Ltd.
	Timeless Suppliers Pvt. Ltd.	Solty Dealtrade Pvt. Ltd.
Vijay Lahoti	Ranpriya Tradevin Pvt. Ltd.	Needful Projects Advisory Pvt. Ltd.

- (o). During the Financial Year 2011-12, both *CPAL* and *PML*, were converted from private limited companies to public unlisted companies. From the list of shareholders of *PML* and *CPAL* as on September 2012, as available on the MCA website, it was observed that

the shares of CPAL and PML were held by 1100 entities and 680 entities respectively. Thus, shares of CPAL and PML were transferred from the above mentioned recipients of CPAL shares and recipients of PML shares to 1100 entities and 680 entities respectively. Further, as per the records of the Registrar to Issue and Share Transfer Agent of Kailash Auto, as on record date (June 08, 2013) shares of CPAL were held by 1972 entities and shares of PML were held by 2058 entities. Out of total shareholders of CPAL and PML (4030 entities), 85 entities were common shareholders of CPAL and PML. Thus, pursuant to amalgamation, 1972 shareholders of CPAL and 2058 shareholders of PML had received shares of Kailash Auto (hereinafter referred to as "beneficiaries").

- (p). The key financial figures of CPAL and PML for the Financial Year 2010-11 and Financial Year 2011-12 are as following:

Table 7 - Key financial figures of CPAL and PML

Particulars	CPAL (in ₹)	PML (in ₹)
Profit (Loss) after tax for the year (10-11)	(2,529)	(2,433)
Profit (Loss) after tax for the year (11-12)	31,742	21,766
Inventories, Tangible Assets, Intangible Assets for the year (10-11)	0	0
Inventories, Tangible Assets, Intangible Assets for the year (11-12)	0	0

Source: MCA

- (q). The key financial figures of the Kailash Auto for the Financial Years 2010-11, 2011-12, 2012-13 and 2013-14 are tabulated as below:

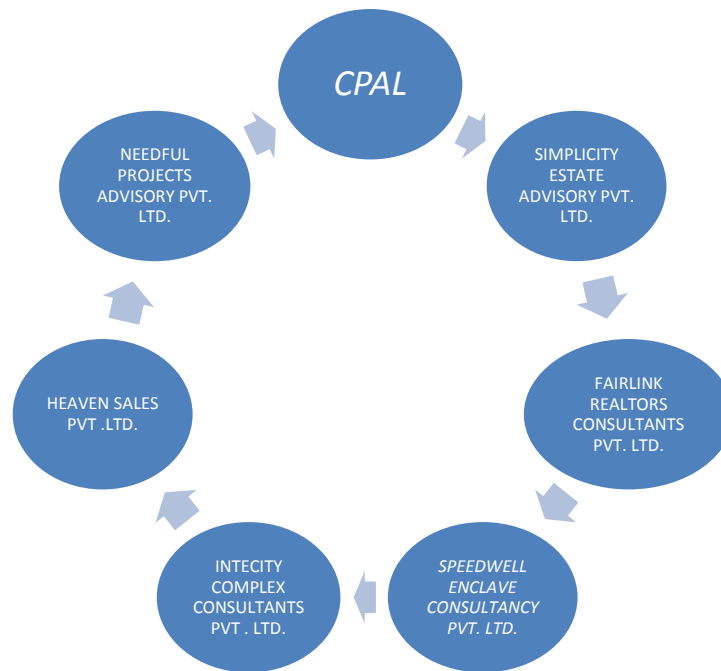
Table 8 - Key financial figures of Kailash Auto

Year	FY13-14 (₹ in crore)	FY12-13 (₹ in crore)	FY11-12 (₹ in crore)	FY10-11 (₹ in crore)
Operating Income	20.41*	0.34	0.13	0.35
Operating & Administration Expenses	18.88*	0.3	0.1	0.12
Employee Expense	0.05	0.02	0.05	0.1
Adjusted Net Profit	0.84	0.01	-0.21	-0.17
Price Earning (P/E)	4,065.00	0	0	0
EPS	0.01	0	-0.51	0
Price to Book Value (P/BV)	41.06	22.14	0	0
Price/Cash EPS (P/CEPS)	2,841.14	1,27,400.70	0	0
EV/EBIDTA	0	0	0	0

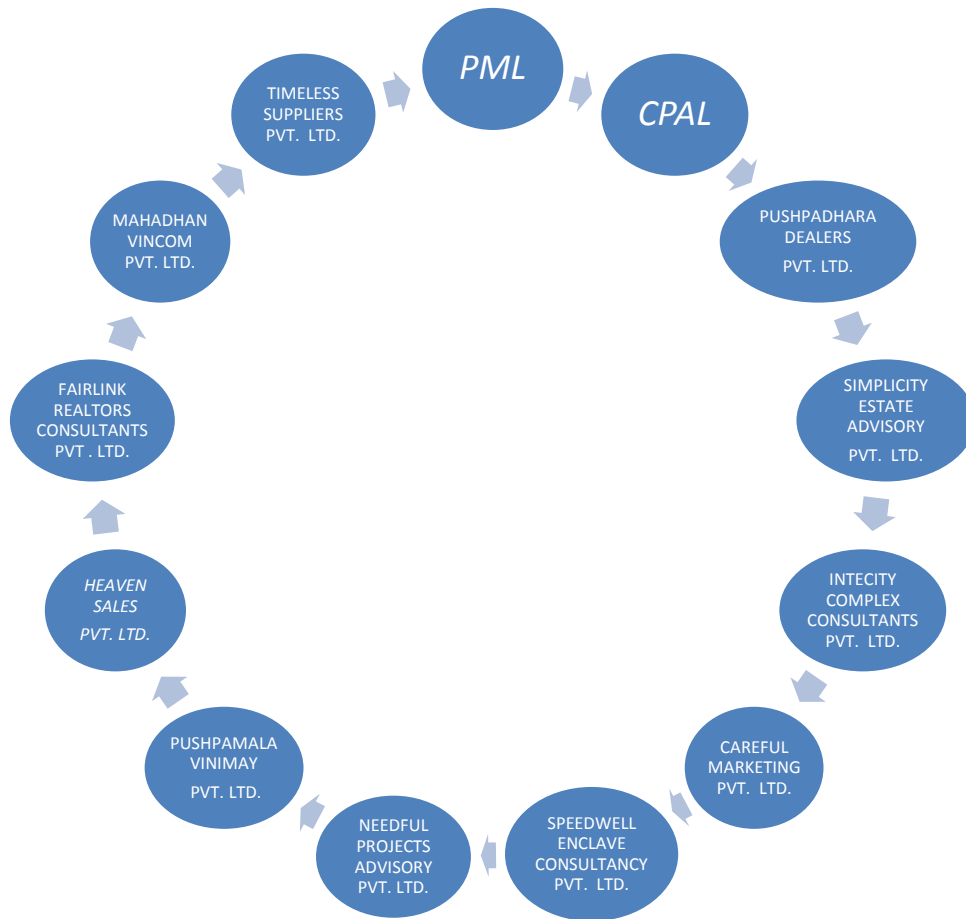
Source: Capitaline and BSE

*Operating income reported during April 2013 to March 2014 is 20.41 crores. Company has clarified to BSE that this value of 20.41 crores is sales value of securities sold in the market during the FY 13-14. Also the operating administrative expense reported 18.88 crores is the buy value of securities bought from the market during the FY 13-14.

- (r). Considering the operating performance and net profit of *CPAL* and *PML* in the year of incorporation 2010-11 and Financial Year 2011-12, it was noted that despite having weak operating results during the said financial years *CPAL* and *PML* had issued bonus shares in an unrealistic and disproportionate ratio (viz., 1:55 and 1: 65, respectively).
- (s). From the bank statement of the aforesaid *primary allottees* of *CPAL* and *PML* for the period of December 2010 to June 2011 it was observed that same funds were being churned among *CPAL*, *PML* and their respective *primary allottees*. Further, from the Annual Report of 2010-11 of *CPAL* and *PML* it was observed that these companies, in concert with their *primary allottees* had developed a mechanism by virtue of which *CPAL*, *PML* and their *primary allottees* made book entries of purported investment in each others' equity shares. Accordingly, there was no infusion of cash in respect of private placements by *CPAL* and *PML* but it resulted in generation of fictitious share premium value in the books of accounts of *CPAL* and *PML*.
- (t). This circulation of funds between *CPAL*, *PML* and their *primary allottees* is briefly presented in the following diagrams:



Circulation of fund of ₹11,00,000/- through investment between CPAL and primary allottees on December 06, 2010



Circulation of fund of ₹12,00,000/- through investment between PML, CPAL and primary allottees on December 13, 2010.

- (u). It was noted that as a result of these private placements to the *primary allottees of CPAL* and *PML* on March 31, 2011, *CPAL* and *PML* had purportedly raised share premium of ₹19,47,91,450/- and ₹23,24,61,000/-, respectively. This share premium was raised through the circulation of funds as mentioned hereinabove. Further, *CPAL* and *PML* had issued bonus shares by using this fictitious share premium. After the issue of bonus shares by *CPAL* and *PML* resulted in significant increase in the paid up share capital of *CPAL* and *PML*.
- (v). As a result of the schemes of reduction in share capital of *Kailash Auto* and amalgamation of *CPAL* and *PML* the market capital of *Kailash Auto* on May 10, 2013 was ₹10,48,52,545/- consisting of 38,05,900 equity shares of ₹27.55/- each, which was increased to ₹21,72,12,23,071/- on July 22, 2013 consisting of 58,70,60,083 equity shares of ₹37/- each. Thus, the schemes of reduction of share capital and thereafter the amalgamation, the market capital of *Kailash Auto* had increased by 20615.97%, i.e., (approximately 206 times). BSE had permitted listing and trading in the shares of *Kailash Auto* that were issued as consideration in the scheme of amalgamation with effect from

July 22, 2013. Just after change in the promoter group of *Kailash Auto* from Padma Impex Pvt. Ltd. to *PML* and *CPAL*, within a short span of time, the price of the scrip increased significantly which continued till July 22, 2013 when new category share (after amalgamation) of *Kailash Auto* was listed and permitted for trading on BSE.

- (w). The above findings indicate that *CPAL* and *PML* were incorporated with a dubious plan and premeditated arrangement and artifice to increase number of shares therein through sham and non-genuine transactions with regard to issuance of their shares which resulted in fetching exorbitant and unrealistic consideration in the scheme of amalgamation.
6. In order to analyse the price volume pattern, the trading in the scrip of *Kailash Auto* was analysed in the aforesaid three patches with a focus on the following:-
- (a). trading frequency;
 - (b). trading volume generated;
 - (c). contribution to price rise.
7. During the analysis it was noticed that certain entities related/connected to *Kailash Auto* were found to be the net buyers to the *beneficiaries* and thereby created artificial demand for the supply of shares from *beneficiaries*. From the Know Your Client (KYC) details, their bank statements, off-market transactions amongst them and the information available on the website of the MCA it was observed that these entities were connected to each other. Two such interconnected groups were identified (hereinafter referred to as "*Kailash Auto Group I*" and "*Kailash Auto Group II*"). The particulars of the entities consisting *Kailash Auto Group I* and *Kailash Auto Group II* and the basis of relationship/connection amongst them are provided in the **Annexure A** and **Annexure B**, respectively. For the purpose of this order these entities were shortlisted on the basis of following parameters:
- (a). Top 300 entities based on gross buy/trade quantity;
 - (b). Any entity who has traded in the scrip of *Kailash Auto* and is directly or indirectly connected to the company/its directors/or to entities mentioned in point above.
8. The entities of *Kailash Auto Group I* and *Kailash Auto Group II* (comprising of 34 entities and 54 entities respectively) accounted for total buy volume of 17.50 crores of equity shares of *Kailash Auto*. It was observed that Bholebaba Suppliers Pvt. Ltd. and Nirdesh Trading Pvt. Ltd. were the top buyers amongst the *Kailash Auto Group I* and *Kailash Auto Group II* entities, respectively. Further, both these entities were the shareholders of Sri Karani Exports Pvt. Ltd. (the present promoter of *Kailash Auto*). It was also observed that 6 entities namely, Ecstatic Merchandise Pvt. Ltd., Pragyan Vincom Pvt. Ltd., Wondrous Marketing Pvt. Ltd., Sonnet Mercantile Pvt. Ltd., Ecstatic Traders Pvt. Ltd. and Casuarina Tradelink Pvt. Ltd. were *recipients of CPAL shares* and *recipients of PML shares* (that acted as conduit to distribute

the equity shares of CPAL/PML to beneficiaries) and were also part of Kailash Auto Group I (that had acted as buyer to such beneficiaries to provide exit from market at high value).

9. During Patch-1, on January 17, 2013, the scrip opened at ₹11/- and closed at ₹36.25/- on June 04, 2013, i.e., recorded a substantial price rise of 230%. During said period, the scrip was traded only on 36 trading days with an average trading volume of 280 shares per day and an average of 3 trades per day (on 4 out of 36 trading days, extreme trading volumes were observed and same was not included as part of computing average trading volume during Patch-1). It was observed that price of the scrip was influenced by certain entities primarily through first trades during this period. It was also noticed that these entities by putting 1 or 2 trades per day with negligible/very less quantity of buy order contributed significantly to the price rise. From last traded price ("LTP") analysis, it was observed that price of the scrip increased from ₹11 to ₹36.25 mainly through first trades on 27 instances. Out of these 27 instances, Shyam Kanheyalal Vyas and Bharat Bagri (HUF) established new high price on 13 instances. Out of total price rise of ₹25.75/-, the contribution of these two entities in establishing new high price was ₹14.57/- which constitutes 56.58% of the total new high price. It was noted that the counterparty client to the trades of these two entities (in most of the cases) were PML, Overall Vincom Pvt. Ltd. (forming part of recipients of PML shares) and Bholebaba Suppliers Pvt. Ltd. (an entity from Kailash Auto Group I). The scrip was an illiquid one at that point of time and there was negligible trading therein at that time. Considering this fact and that the connected entities of Kailash Auto were counter parties to the trades of these two entities it was prima facie observed that these two entities along with PML, Overall Vincom Pvt. Ltd and Bholebaba Suppliers Pvt. Ltd. manipulated the price of the scrip during Patch -1 under a premeditated plan. The details of contribution to price rise by these two entities during Patch -1 are as shown in the following Table:

Table 9 - Contribution to price rise in Patch -1 by top two entities

Client Name	Positive Contribution (in %)	Total Positive Contribution (in ₹)	Positive LTP Contribution of the Client as a buyer	Count of LTP
Shyam Kanheyalal Vyas	44.08	25.75	11.35	09
Bharat Bagri (HUF)	12.50	25.75	3.22	04
Total	56.58	25.75	14.57	13

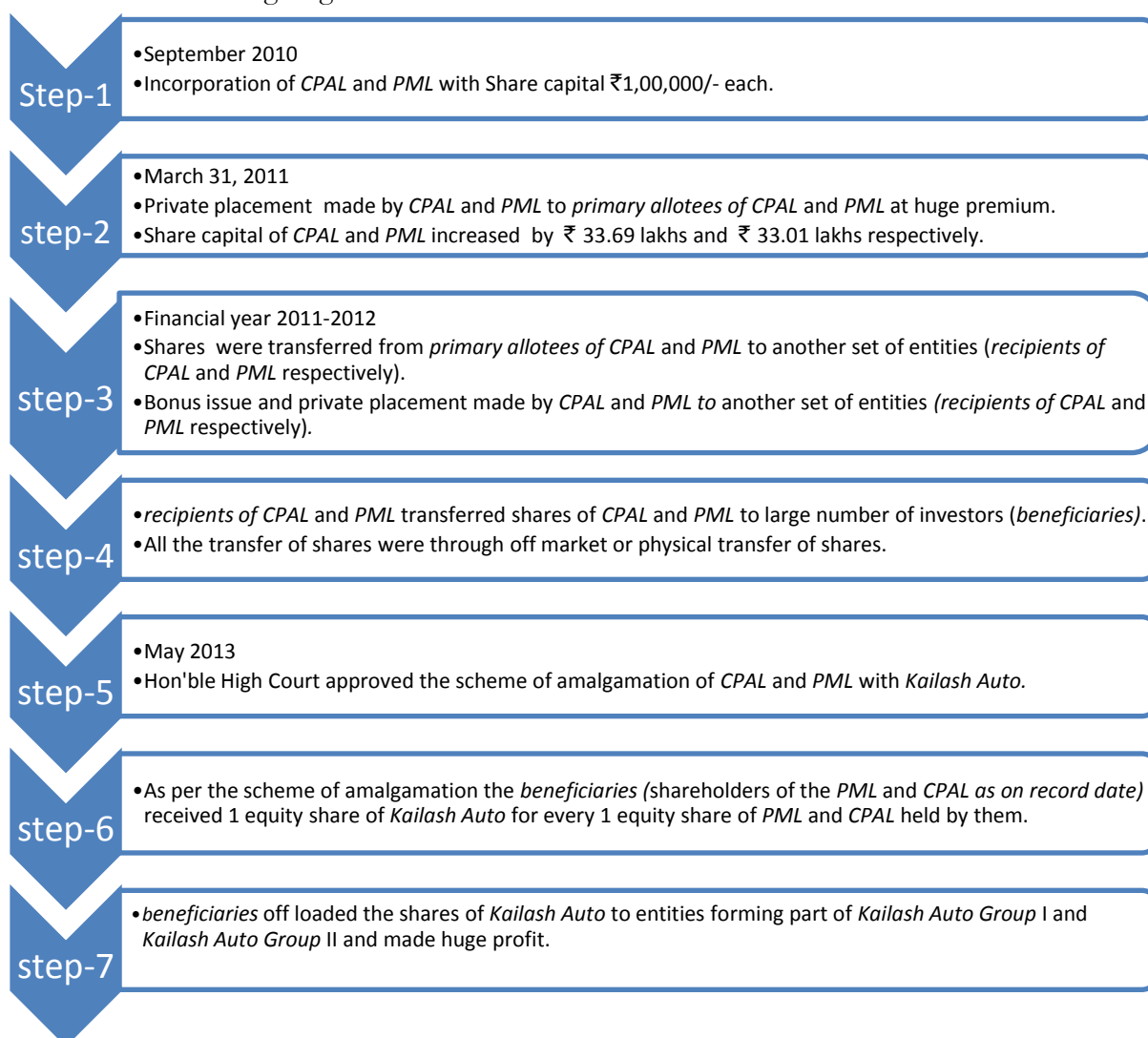
10. During Patch -2, the price of the scrip of Kailash Auto opened at ₹37.00/- on July 22, 2013 and closed at ₹28.45/- on November 05, 2014. The scrip touched a high of ₹48/- on November 29, 2013. During this period, the scrip was traded on 316 trading days with an average trading volume of 15,61,706 shares and daily average number of trade of 685. As compared to Patch -1, in Patch -2 the average volume increased by 5,57,752.10%, i.e., (5577

times). It was observed that during Patch -2 total volume traded in the scrip of *Kailash Auto* was 49.36 crore shares and out of this 40.82 crore shares were bought by top 300 buyers/entities and the *beneficiaries* accounted for selling of 46.56 crore shares. It was also noticed that during Patch -2, the *beneficiaries* were net sellers and entities forming part of *Kailash Auto Group I* and *Kailash Auto Group II* were net buyers, a summary of which is given below:-

Table 10 - Exit provided by *Kailash Auto Group I* and *Kailash Auto Group II* to *beneficiaries*

	Gross sell	Gross sell as % of Market	Gross Buy	Gross Buy as % of Market Gross
Beneficiaries	46,56,90,392	94.32	-	-
<i>Kailash Auto Group</i>	-	-	17,50,81,045	35.47

11. Movement of shares from *CPAL* and *PML* to *Kailash Auto Group I* and *Kailash Auto Group II* is shown in the following diagram:



Flow chart of movement of equity share

12. The *beneficiaries* had received shares of *CPAL* and *PML* at an average price of ₹1/- per share. Pursuant to the scheme of amalgamation, for every one equity share held by the shareholders of *CPAL* and *PML* (*beneficiaries*), one equity share of *Kailash Auto* was allotted to them. These *beneficiaries* off-loaded such shares of *Kailash Auto* (after the period of shareholding for such shares was 1 or more years) at an average price of ₹35/- which was artificially increased on the platform of the stock exchange and in the process made huge profit of approximately 3400% on their investment in a period of 12 months or more. The profit/gain earned by *beneficiaries* during Patch-2 is detailed in the following Table:-

Table 11 - Profit made by the *beneficiaries*

<i>Beneficiaries</i> breakup (in terms of unit sold)	No. of <i>beneficiaries</i>	Total quantity sold	Total sell quantity (%)	Estimate amount of money converted/ profit made
10 lakh and more	39	7,93,15,052	17.03	2,69,67,11,768
6 lakh and more - Less than 10 lakh	38	2,71,32,692	5.83	92,25,11,528
5 lakh and more - Less than 6 lakh	41	2,08,81,373	4.48	70,99,66,682
2 lakh and more- Less than 5 lakh	530	14,19,23,451	30.48	4,82,53,97,334
1 lakh and more - less than 2 lakh	939	10,69,55,216	22.97	3,63,64,77,344
below 1 lakh	2005	8,94,82,608	19.22	3,04,24,08,672
<i>Total</i>	<i>3592</i>	<i>465690392</i>	<i>100</i>	<i>15,83,34,73,328</i>

13. At this stage, it was observed that 118 *beneficiaries* had sold 5 lakh shares or more during the Patch - 2. The list of these 118 *beneficiaries* along with their sell trading volume is given in **Annexure C**.
14. From the bank statements of top 5 entities of *Kailash Auto Group I* and *Kailash Auto Group II*, it was observed that these entities had huge inflow of funds from different sources and from promoter/promoter related entities of *Kailash Auto*. Fund flow to these entities of *Kailash Auto Group I* and *Kailash Auto Group II* is given in the following Table:

Table 12 - Fund flow from promoter/promoter related entities of *Kailash Auto* to top 5 entities of *Kailash Auto Group I* and *Kailash Auto Group II*

<i>*Entities of Kailash Auto Group I and Kailash Auto Group II (Payee /Fund received)</i> / <i>** Promoter/promoter related entities (Payer/fund paid)</i>	Stepan Commotrade Pvt. Ltd.	Sri Karani Exports Pvt. Ltd.	Build Con Finance Limited	Nirdesh Trading Pvt. Ltd.	Total
<i>Ecstatic Merchandise Pvt. Ltd.</i>	55,50,000	20,00,000			75,50,000
<i>Keshavah Dealtrade Pvt. Ltd.</i>	91,00,000	1,14,15,000	72,00,000		2,77,15,000
<i>Keshavah Mercantile Pvt. Ltd.</i>	90,00,000	1,28,70,000			2,18,70,000
<i>Quickscope Dealers Pvt. Ltd.</i>	68,00,000.00	1,49,42,000			2,17,42,000
<i>Saktimata Marketing Pvt. Ltd.</i>				1,70,00,000	1,70,00,000
Total	3,04,50,000	4,12,27,000	72,00,000	1,70,00,000	9,58,77,000

** Entities of Kailash Auto Group I and Kailash Auto Group II, who had received funds (payee) consists of Ecstatic Merchandise Pvt. Ltd., Keshavah Dealtrade Pvt. Ltd., Keshavah Mercantile Pvt. Ltd., Quickscope Dealers Pvt. Ltd. and Saktimata Marketing Pvt. Ltd.*

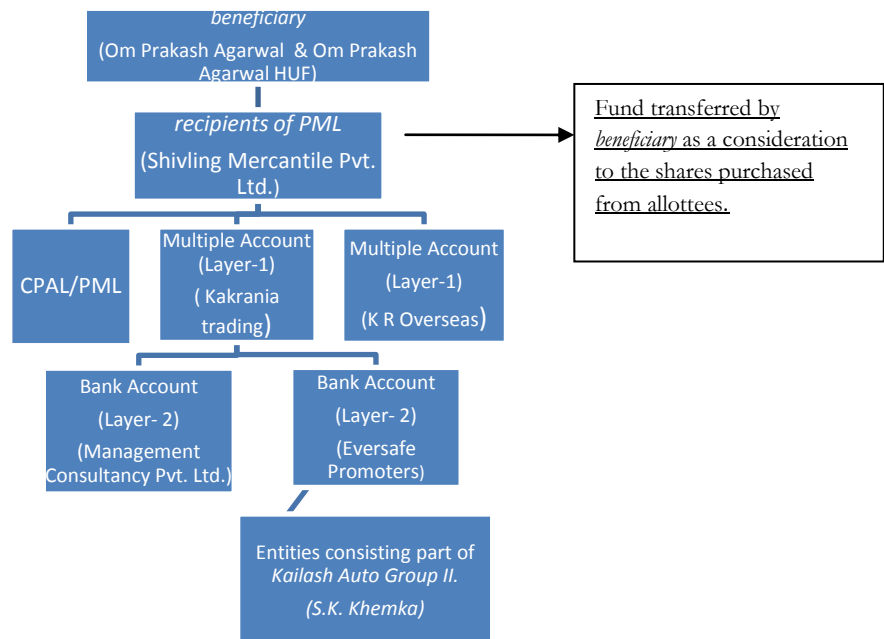
*** Promoter/promoter related entities, who had transferred the funds (payer) consists of Stepan Commotrade Pvt. Ltd., Sri Karani Exports Pvt. Ltd., Build Con Finance Limited and Nirdesh trading Pvt. Ltd.*

15. The above Table depicts the transfer of funds amounting to ₹9,58,77,000/- from some of the promoter/promoter related entities of *Kailash Auto* to the entities of *Kailash Auto Group I* and *Kailash Auto Group II*. Further, top entities (in terms of buy trading volume) of *Kailash Auto Group I* and *Kailash Auto Group II* were majorly funded by Sri Karani Exports Pvt. Ltd., Stepan Commotrade Pvt. Ltd., Build Con Finance Limited and Nirdesh Trading Pvt. Ltd. It was noted that Sri Karani Exports Pvt. Ltd. and Radhashyam Dealtrade Private Limited are the only promoters of *Kailash Auto*. Sri Karani Exports Pvt. Ltd. is a closely held private limited company wherein Stepan Commotrade Pvt. Ltd. and Nirdesh Trading Pvt. Ltd. were two of its very few shareholders. Similarly, Radhashyam Dealtrade Private Limited is a closely held private limited company wherein Buildcon Finance Ltd. was one of its few shareholders. Thus, Sri Karani Exports Pvt. Ltd., Radhashyam Dealtrade Pvt. Ltd., Stepan Commotrade Pvt. Ltd., Nirdesh Trading Pvt. Ltd. and BuildCon Finance Ltd. are promoter/promoter related entities of *Kailash Auto*. Similar fund flow analysis was done for most of the entities of *Kailash Auto Group I* and *Kailash Auto Group II* who also were found to be trading in Patch -2 and it was observed that most of the entities of *Kailash Auto Group I* and *Kailash Auto Group II* received funds from various sources and aforesaid promoter /promoter related entities of *Kailash Auto*. Most of the entities of *Kailash Auto Group I* and *Kailash Auto Group II* are private limited companies, claiming to be engaged in various kinds

of businesses. However, the analysis of bank statement of these entities shows significant layering of funds by way of funds transfers masking the true identity of ultimate owners of fund.

16. Immediately after receipt of funds in the above manner, the entities of *Kailash Auto Group I* and *Kailash Auto Group II* traded in this scrip only through purchase transactions from *beneficiaries* in Patch II and created substantial traded volume during this period. These entities had transferred these funds, directly /indirectly to trading members through whom they had traded in this scrip and other scrips involving transactions for the purpose of alleged bogus long term capital gains tax exemption. Considering the income of these entities as shown in their KYC documents and the volume of their transactions, it was noted that their transaction were not commensurate with their disclosed income. Thus, it was observed that such fund transactions between promoter/promoter related entities of *Kailash Auto* and the entities of *Kailash Auto Group I* and *Kailash Auto Group II* were primarily for the purchase of equity shares of *Kailash Auto* by them from *beneficiaries* who are also connected /related, directly or indirectly, with *CPAL* and *PML* as discussed hereinafter.

17. From the bank statements of few *beneficiaries* (considering the volume of transfer of equity shares of *CPAL* and *PML* from *recipients of CPAL shares* and *recipients of PML shares* to *beneficiaries*), *recipients of CPAL shares* and *recipients of PML shares*, movements of funds through layering of fund were observed. It was noted that funds received by *recipients of CPAL shares* and *recipients of PML shares* from the *beneficiaries* were transferred to various entities including *CPAL* and /or *PML* and *via* multiple layering; fund was finally transferred to the entities belonging to *Kailash Auto Group I* and *II*. A typical flow chart of movement of funds for one of the top *beneficiaries* is given below:



18. In the above example, it can be seen that funds have been transferred by Mr. Om Prakash Agarwal and Om Prakash Agarwal HUF (a *beneficiary*) to Shivling Mercantile Pvt. Ltd. (*recipients of PML shares*) as a consideration for the purchase of equity shares of PML. After receiving funds from Mr. Om Prakash Agarwal and Om Prakash Agarwal HUF, Shivling Mercantile Pvt. Ltd. transferred funds on the same day fund to CPAL, Kakrania Trading Pvt. Ltd. and some other entities. Kakrania Trading Pvt. Ltd. transferred the amount that it received from Shivling Mercantile Pvt. Ltd. to Management Consultancy Pvt. Ltd. and Eversafe Promoters on the same day. Eversafe Promoters transferred fund to one Mr. S. K. Khemka on the same day. Mr. S. K. Khemka is part of *Kailash Auto Group II*, who are facilitating exit to the *beneficiary* in the market at high price. From the above flow of fund it is observed that the purported consideration paid by a *beneficiary* is transferred to the entities of *Kailash Auto Group II* or the entities controlled by PML/CPAL through multiple layers. Thus, the transfer of shares of PML between a *beneficiary* and a *recipient of PML shares* is farce and is meant to create an impression of transfer.
19. During Patch -3 (November 07, 2014 to December 31, 2015) significant down fall in the price of the scrip was observed. Price of the scrip plunged from ₹28.50/- to ₹2.01/-, i.e., downfall of 92.94% was recorded. Between the period, from November 07, 2014 to February 13, 2015 price plunged from ₹28.50/- to ₹4.25/-, i.e., downfall of 85.06% was recorded in 69 trading days. Further during the period from February 13, 2015 to June 19, 2015, i.e., in 85 trading days price of the scrip surged to ₹12.15/- on June 19, 2015 amounting to price rise of 185.88%, again during the period from June 22, 2015 to December 31, 2015, price of the scrip plunged to ₹2.01/- on December 31, 2015 amounting to price fall of 83.45%. During Patch -3 daily average trading volume was reduced to 7 lakh shares in comparison of daily average trading volume of 15 lakh shares during Patch -2. During Patch -3 total volume traded in the scrip of *Kailash Auto* was 20.49 crores shares and out of this, 352 *beneficiaries* had offloaded 4.96 crores shares of *Kailash Auto* in the market at an average price of ₹12.65/-. Counterparties to such trade forming part of *Kailash Auto Group I and Kailash Auto Group II* contributes to 40 % of total volume offloaded by *beneficiaries* in Patch -3. It is noted that in the Patch -3 trading volume concentration by *beneficiaries* and entities of *Kailash Auto Group I and Kailash Auto Group II* was significantly low compared to Patch -2. During Patch -2 *beneficiaries* accounted for 94.32% of gross sell volume and *Kailash Auto Group I and Kailash Auto Group II* cumulatively accounted for 35.47% of gross buy volume, however in Patch -3 *beneficiaries* accounted for only 24.21% of gross sell volume and *Kailash Auto Group I and Kailash Auto Group II* cumulatively accounted for 25.37% of gross buy volume. Thus, the downward trend of traded volume and price of the scrip of *Kailash Auto* in Patch -3 was on account of the lower trading concentration by

beneficiaries and entities of *Kailash Auto Group I* and *Kailash Auto Group II* and indicates more involvement of gullible and genuine investors in trading in the scrip of *Kailash Auto*.

20. From the preliminary examination it is observed that the scheme of reduction of share capital and amalgamation were the mechanism adopted by the *Kailash Auto* to dubiously increase its value of market capital significantly. From the *prima facie* findings of preliminary examination it is *inter alia* noted that:-

- (a). During the financial year 2010-11, *CPAL* and *PML* were incorporated with a dubious plan and premeditated arrangement and artifice to increase number of equity shares therein through sham and non-genuine transactions with regard to issuance of their shares which resulted in fetching exorbitant and unrealistic consideration in the scheme of amalgamation. Pursuant to amalgamation 2058 shareholders of *PML* and 1,972 shareholders of *CPAL* (*beneficiaries*) received 58,59,10,800 shares of *Kailash Auto* in the form of consideration.
- (b). Subsequent to acquisition of management and control of *Kailash Auto* by *CPAL* and *PML* the price of the *Kailash Auto* was rigged by 230% from Jan 2013 to June 04, 2013 (Patch- 1). During Patch- 1, the scrip was an illiquid one and there was negligible trading therein at that time. During this period the price was manipulated by the connected parties who traded under pre-meditated plan. During the Patch-2 average trading volume increased by 5577 times compared to Patch-1. During this period , the *beneficiaries* were net sellers and entities forming part of *Kailash Auto Group I* and *Kailash Auto Group II* were net buyers. The high trading volumes were contributed by *Kailash Auto Group I* and *Kailash Auto Group II* acting as net buyers to the *beneficiaries'* sale. Entities of *Kailash Auto Group I* and *Kailash Auto Group II* who have provided exit to these *beneficiaries* were *prima facie* connected to each other. In the process, *beneficiaries* made huge profit of approximately 3400% on their investment in a period of 12 months or more and thereon claimed the exemption of long term capital gains (LTCG) on such profit.. During Patch -3 the downward trend in the trading volume and price of the scrip of *Kailash Auto* was on account of the trades of the *beneficiaries* who were exiting from the market.
- (c). Purported consideration for transfer of equity shares of *CPAL* and *PML* by the *recipients of CPAL shares* and *recipients of PML shares* was paid by the *beneficiaries* and the same was transferred, directly or through multiple layering, by *recipients of CPAL shares* and *recipients of PML shares* to the entities belonging to *Kailash Auto Group I* and *Kailash Auto Group II* or entities controlled by *CPAL/PML*.
- (d). Entities of *Kailash Auto Group I* and *Kailash Auto Group II* were being funded by different sources including the current promoter group of *Kailash Auto* to buy shares of *Kailash Auto*

from the *beneficiaries* and provide exit to them from the market. *Kailash Auto Group I* and *Kailash Auto Group II* had received the funds *via* multiple layering /transfer of funds so as to mask the true identity of ultimate owner of fund.

(e). The key financial figure/ratio of *Kailash Auto* was unfavourable and well below the industry standards. The company operating revenue and operating expenditure depicts that very poor or no operating performance is being carried out by *Kailash Auto*. *Kailash Auto* has continuously reported negative or no profit. Further, earning per share (EPS) of *Kailash Auto* was nil or negative and value of scrip was highly inflated with respect to its book value. Considering the financial and operating figures of *Kailash Auto*, such huge market capital of *Kailash Auto* and price/traded volumes in its scrip during relevant periods are found to be inflated and unrealistic.

21. From the above facts and circumstances it is noted that shortly after their incorporation *CPAL* and *PML* made private placement to the *primary allottees*. In their private placements *CPAL* and *PML* issued equity shares for value of ₹19.80 crores and ₹23.58 crores, respectively by circulating back and forth smaller amounts of funds amongst the *primary allottees* and themselves. Thus, on account of the repeated circulation of funds between different primary allottees and the companies, the receipt of allotment money for total equity shares issued in the private placement had been merely as book entry. I, therefore, *prima facie* find that these companies and their *primary allottees* engineered a web of transfers and retransfers of funds and shares amongst themselves in a bid to create a facade of infusion of funds by way of private placement of shares when actually there was actually no infusion of funds for the large part of the private placement. In the private placement by *CPAL* and *PML*, the purported share premium amount of ₹19,47,91,450/- and ₹23,24,61,000/-, respectively were also through circulation of funds and, in effect, there was no infusion of funds towards such share premium. I further note that the *primary allottees* are connected /related amongst themselves and with *CPAL* and *PML* as discussed hereinabove. The *primary allottees* transferred the shares received by them in the private placements to the *recipients of CPAL shares* and *recipients of PML shares* who are also connected amongst themselves and with *CPAL* and *PML* on the basis of *inter se* fund transfer. Thereafter, these companies issued bonus shares without having any profit or real security premium. Consequently, there was significant increase in the paid up share capital of *CPAL* and *PML* without receipt of actual consideration. Thus, the private placement to *primary allottees*, subsequent transfer of shares by *primary allottees* to *recipients of CPAL shares/recipients of PML shares* and bonus issues were *prima facie* sham transactions. Such increase in paid up share capital of *CPAL* and *PML* through sham transactions gave rise to an elaborate edifice of unrealistic liquidity, i.e., the trading volume surged by 5577 times during Patch- 2 as compared to trading volume in Patch- 1.

22. After receipt of shares of *CPAL* and *PML* from the *primary allottees*, the *recipients of CPAL shares* and *recipients of PML shares* transferred those shares to a large number of *beneficiaries*, who are also connected /related with *recipients of CPAL shares* and *recipients of PML shares* and these companies on the basis of fund transfers, at the average price of ₹1/- per share. Fund received by *recipients of CPAL shares* and *recipients of PML shares* from *beneficiaries*, as purported consideration for transfer of shares of *CPAL* and *PML*, were transferred to various other entities including *CPAL* and *PML*. Thus, *CPAL* and *PML* had used the *recipients of CPAL shares* and *recipients of PML shares* as conduit to facilitate the transfer of their shares to the *beneficiaries*. The *beneficiaries* who received the shares of *CPAL* and *PML* swapped those shares with the shares of *Kailash Auto* as per the scheme of amalgamation on June 08, 2013. The facts and circumstances brought out in preliminary examination *prima facie* indicate that *CPAL* and *PML* were incorporated with a dubious plan and premeditated arrangement to increase number of equity shares therein through such sham and non-genuine transactions which resulted in fetching exorbitant and unrealistic consideration for their shares in the scheme of amalgamation.
23. From the observations of preliminary inquiry it is noted that *Kailash Auto* did not have any business operations during the relevant period. It had very poor fundamentals during the relevant period i.e., the financial years 2010-11, 2011-12, 2012-13 and 2013-14. The adjusted net profits and earnings per share (EPS) of *Kailash Auto* for these periods were always nil or negligible as reported by it. Prior to Patch -1, there was no trading at all in the scrip of *Kailash Auto* and there was no market discovered price for the scrip during this period. Thus, the astronomical increase in the price of the scrip during Patch -1 and continuance of the increased price throughout till Patch-2 was not supported by any genuine factor such as fundamentals/operating results of the company and market forces of supply and demand in its shares. Such price rise and maintenance thereof during the relevant period were predominantly on account of transactions amongst the connected/related entities during these periods as found during preliminary inquiry.
24. In this regard, it is noted that during Patch-1, price of the shares of *Kailash Auto* were rigged by top LTP contributors from ₹11 to ₹36.25 mainly through first trades on 27 instances acting in league with connected counter parties under a pre-meditated plan, device and artifice. After artificially increasing the price of the scrip in Patch-1 through manipulations with active involvement of these connected counter parties, the *beneficiaries* off-loaded the shares of *Kailash Auto* at an average price of ₹35/-each to the connected entities of *Kailash Auto Group I* and *Kailash Auto Group II* and made huge profit of approximately 3400% on their investment. It is relevant to mention that prior to Patch-2, the scrip of *Kailash Auto* was illiquid and thinly traded. On account of price increase during Patch -1, trading interest of gullible investors in the scrip was created. After Patch -1 when *beneficiaries* started exiting to

connected/related entities of *Kailash Auto Group I* and *Kailash Auto Group II* trading by gullible investors was witnessed. In Patch -2, substantial traded volume in the scrip was created on account of trading amongst the connected /related parties , namely, *beneficiaries* and the entities of *Kailash Auto Group I* and *Kailash Auto Group II*. Further, in Patch-3, price of the scrip plunged from ₹28.50/- to ₹2.01/- due to lower trading concentration by *beneficiaries* and entities of *Kailash Auto Group I* and *Kailash Auto Group II*. Thus during Patch-2 the price in the scrip of *Kailash Auto* was maintained by the artificial demand supply forces fabricated through the phalanx of *beneficiaries* and entities of *Kailash Auto Group I* and *Kailash Auto Group II*. It has been observed that in Patch -3 the innocent and gullible investors had been lured into trading in the scrip of *Kailash Auto* and they had been entrapped in the price fluctuations of the scrip. In these facts and circumstances, I, *prima facie*, find that these connected entities, namely, the LTP contributors and connected counterparties to their traders, *beneficiaries* and entities of *Kailash Auto Group I* and *Kailash Auto Group II* indulged in price and volume manipulation in the scrip.

25. It is also relevant to mention that as per the provision of Explanation 1 to section 2(42A) of the Income Tax Act, 1961 - "*In determining the period for which any capital asset is held by the assessee in the case of a capital asset being a share or shares in an Indian company, which becomes the property of the assessee in consideration of a transfer, there shall be included the period for which the share or shares in the amalgamating company were held by the assessee*". Thus, though the *beneficiaries* had received the shares of *Kailash Auto* on June 08, 2013, the holding period of 12 months for the purpose of exemption from tax on LTCG, the gains made by *beneficiaries* on account of sale of shares of *Kailash Auto* would be eligible for LTCG exemption under Income Tax Act, 1961 since they were holding shares of *CPAL* and *PML* prior to swap under the scheme of amalgamation. In the entire process, the *beneficiaries* made huge profit of approximately 3400% on their investment and claimed exemption of long term capital gains (LTCG) on such profit. I, *prima facie*, find that such profit was generated on account of rigged price of the scrip and creation of artificially inflated volumes. Thus, the details of transactions put through in such a ruse contain tell-tale story of how the entire process of private placement, fabrication of share premium, issuance of bonus shares, subsequent transfer of shares and funds to connected/related entities was designed and structured on the building blocks of a slew of transfers and retransfers to beguile the same as transactions with commercial sense to generate bogus LTCG which is exempt from tax under the provisions of the Income Tax Act, 1961. During this process the stock exchange system was grossly misused.
26. The facts of this case, apart from being a possible case of tax evasion which could be seen by the concerned law enforcement agencies separately, *prima facie* also involves 'fraud' in connection with dealing in securities and on securities market. I, therefore, *prima facie* find that acts and dealings of *primary allottees, recipients of CPAL shares* and *recipients of PML shares*,

beneficiaries, LTP contributors , entities of *Kailash Auto Group I* and *Kailash Auto Group II* , as discussed hereinabove are '*fraudulent*', manipulative and deceptive under regulation 2(1)(c) of the SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 ('PFUTP Regulations') and they have *prima facie* contravened the provisions of regulations 3(a), (b), (c) and (d) and 4(1), 4(2)(a), (b), (e) and (g) thereof and section 12A(a), (b) and (c) of the Securities and Exchange Board of India Act, 1992 (the SEBI Act). The said provisions are reproduced hereunder:-

SEBI ACT

Prohibition of manipulative and deceptive devices, insider trading and substantial acquisition of securities or control.

"12A. No person shall directly or indirectly—

(a) use or employ, in connection with the issue, purchase or sale of any securities listed or proposed to be listed on a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of this Act or the rules or the regulations made thereunder;

(b) employ any device, scheme or artifice to defraud in connection with issue or dealing in securities which are listed or proposed to be listed on a recognised stock exchange;

(c) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person, in connection with the issue, dealing in securities which are listed or proposed to be listed on a recognised stock exchange, in contravention of the provisions of this Act or the rules or the regulations made thereunder;"

PFUTP Regulations

"3. Prohibition of certain dealings in securities

No person shall directly or indirectly—

(a) buy, sell or otherwise deal in securities in a fraudulent manner;

(b) use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under;

(c) employ any device, scheme or artifice to defraud in connection with dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange;

(d) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under.

4. Prohibition of manipulative, fraudulent and unfair trade practices

(1) Without prejudice to the provisions of regulation 3, no person shall indulge in a fraudulent or an

unfair trade practice in securities.

(2) Dealing in securities shall be deemed to be a fraudulent or an unfair trade practice if it involves fraud and may include all or any of the following, namely:—

(a) indulging in an act which creates false or misleading appearance of trading in the securities market;

(b) dealing in a security not intended to effect transfer of beneficial ownership but intended to operate only as a device to inflate, depress or cause fluctuations in the price of such security for wrongful gain or avoidance of loss;

....

(e) any act or omission amounting to manipulation of the price of a security;

....

(g) entering into a transaction in securities without intention of performing it or without intention of change of ownership of such security;"

27. I am of the opinion that a detailed investigation of the entire scheme, plan, device and artifice employed by concerned entities and to find out the ultimate owners of funds used for facilitating the entire scheme, plan, device and artifice is necessary . I further note that during preliminary inquiry it has been observed that few of the *recipients of CPAL shares* and *recipients of PML shares* are connected with Vimit Consulting limited and Lahoti India Limited on the basis of common address and *email Id*. In view of the same, role of Vimit Consulting Limited, Lahoti India Limited and other entities may also be looked into during investigation in this matter. While SEBI would investigate into the probable violations of the securities laws, the matter may also be referred to other law enforcement agencies such as Income Tax Department, Enforcement Directorate and Financial Intelligence Unit for necessary action at their end as may be deemed appropriate by them.
28. It is pertinent to mention that there is no scale to measure fraudulent, deceptive and manipulative device, plan and artifice or its impact and the findings in that regard always depend on inferences drawn from a mass of factual details. Findings in this regard can also be gleaned from patterns of transactions/dealings, conduct and behaviour of connected parties *viz*: incorporation of unlisted companies, apparent irregular transfers of funds and securities, corporate actions and other machinations, whether legal or otherwise, employed to achieve the designed purpose. In the instant case, I , *prima facie*, find that the entire gamut of events commencing from the typical gambit of allotment of shares by *CPAL* and *PML* to a select coterie, running through the maze of funds/shares transfers and retransfers amongst chosen interconnected parties, unrealistic increase of liquidity in shares of *Kailsab Auto* held by shareholders of *CPAL* and *PML* pursuant to scheme of amalgamation is a classic example of touch-me-not distancing through intermediations and culminating in the final denouement wherein connected parties with all their manipulative assemblage came to the fore setting a seal on their machinations of fraudulent, manipulative and deceptive dealings

to the detriment of unsuspecting investors.

29. The whole picture on the canvass suggests tell-tale strands of how each one of the connected entities at various sequences in the chain has catalysed the routing of funds and shares, in a web of make believe transfers/transactions meant to mislead and obfuscate, to the final confluence in the market amidst artificial volume and price rise entrapping the unsuspecting and gullible investors. The connected entities, acting in concert under a premeditated plan, had acquired dominant market power for the shares of *Kailash Auto*. Their acts, conduct, behaviour and dealings connote a deceptive conduct designed to deceive or defraud investors by controlling or artificially affecting the price of shares of *Kailash Auto* since being in dominant position to control supply and demand both they interfered with free forces of supply and demand. By impeding in the natural interplay of market forces, they misled the investors by masking the fair price of the shares of *Kailash Auto*. When all the facts and circumstances of this case are considered holistically they *prima facie* emerge as ingredients in a fraudulent, deceptive and manipulative device, plan and artifice designed to tamper with free market forces and to damage the integrity of the securities markets. The manipulation in the traded volume and price of the scrip by a group of connected entities as observed in this case has potential to further induce unsuspecting and gullible investors to trade in the scrip and harm them. Further, these connected parties have grossly misused the stock exchange system to generate bogus LTCG to aid and help *beneficiaries* to convert their unaccounted income into accounted one with no payment of taxes as LTCG is tax exempt.
30. SEBI strives to safeguard and protect the interests of a genuine investor in the Indian securities market. The acts of artificially increasing the price and traded volume in the scrip with *mala fide* intention to mislead investors and the fundamental tenets of market integrity get violated with impunity due for such acts. Under the facts and circumstances of this case, I, *prima facie*, find that the acts of *Kailsab Auto Group I*, *Kailsab Auto Group II*, *beneficiaries*, *primary allottees of CPAL*, *recipients of CPAL shares*, *primary allottees of PML*, *recipients of PML shares* and the LTP contributors as described above is inimical to the interests of participants in the securities market. Allowing the entities that are *prima facie* found to be involved in such fraudulent, unfair and manipulative transactions to continue to operate in the market would shake the confidence of the investors in the securities market. Further, the fraudulent, manipulative and deceptive device, plan and artifice employed by connected parties in this case, not only endanger the interests of investors in securities but also the integrity of securities market as a whole. If left unchecked and perpetrators thereof are dealt with leniency on procedure and substance, it will give wrong signals in the system. I am of also of the view, the fraudulent, manipulative and deceptive acts, device, plan and artifice employed by the connected parties acting in league in this case have wider impact on the securities

market and should be dealt with sternly and post- decisional hearing will be sufficient compliance of procedure, in the facts and circumstances of this case. Considering the facts and circumstances of this case and the indulgence of a listed company in such fraudulent, manipulative and deceptive plan, device and artifice as *prima facie* found in this case, I am convinced that this is a fit case where, pending investigation, effective preventive and remedial action is required to be taken by way of *ad interim ex -parte order* to protect the interests of investors and preserve the safety and integrity of the securities market.

31. In view of the foregoing, in order to protect the interest of the investors and safeguard the integrity of the securities market, I, in exercise of the powers conferred upon me in terms of section 19 read with section 11(1), section 11 (4) and section 11B of the SEBI Act, 1992, pending investigation in the matter, hereby restrain the following persons/entities from accessing the securities market and buying, selling or dealing in securities, either directly or indirectly, in any manner whatsoever, till further directions:-

Sl. No.	NAME OF THE ENTITY	PAN
COMPANY		
1	Kailash Auto Finance Ltd.	AACCK0928J
PROMOTER/PROMOTER RELATED ENTITIES OF KAILASH AUTO		
2	Sri Karani Exports Pvt. Ltd.	AADCS7710D
3	Radhashyam Dealtrade Pvt. Ltd.	AAF6R6225E
4	Build Con Finance Ltd.	AAACB4475D
BENEFICIARIES		
5	Rahul Agarwal	AEXPA9696R
6	Vikas Agrawal	AFBPA9883M
7	Om Prakash Agarwal	ACIPA3823H
8	Hitesh Ramprakash Chhatwal	ADSPC4388E
9	Om Prakash Agarwal HUF	AAAHO5501J
10	Rajesh Ramswarup Sarda	AHAPS4925M
11	Shilpa Agarwal	AHQPK3316G
12	Dharam Paul	ACGPP5575P
13	Neeraj Kumar	AGVVK7036P
14	Charanjeet Singh	ADWPS5227Q
15	Rajesh Ramswarup Sarda HUF	AADHS2286M
16	Kavita Jain	AANPJ9910B

17	Sanjeev Jain	ACFPJ3817P
18	Geetha Jain	ADEPG7030K
19	Veena Rajesh Sarda	AHAPS4880R
20	Ramasamy Santhamani	ALJPS3141G
21	Satish Jain	AAF PJ6142B
22	Dhirajkumar Khetan	AAWPK2634C
23	Vikrant Kumar Khetan	AAWPK2621F
24	GauravBhalotia	ADAPB9680Q
25	Bhagwati Devi Patwari	AEYPP3706L
26	N.Kanniah	AAHPK8800D
27	Nikita Agarwal	AOTPA7379H
28	Sanjib Kumar Patwari HUF	AAPHS3236R
29	Priyanka Patwari	ALSPK8179K
30	Sarika Patwari	ABAPL2442E
31	S K Patwari HUF	AAFHS3391K
32	Sanjay Kumar Patwari HUF	AASHS7307E
33	Shaila Patwari	AJFPP4973M
34	Sanjay Kumar Patwari	AFPPP9576G
35	Sanjib Kumar Patwari	AFRPP9205L
36	Ashok Mustapure	AVRPM3683K
37	KrishnaAgrawal	ACHPA6428P
38	Nand Kishore Agarwal	ACJPA2410P
39	Kuldeep Jaiswal	ACVPJ4561C
40	Amit Jain	AEFPJ8100B
41	Sajjan Kumar Patwari	AEYPP3705K
42	Pratap Uttam Purohit	AFZPP9994A
43	Chandadevi Ramswarup Sarda	AHAPS4924L
44	Kanchan Jain	AAHPJ9207D
45	Sunil Kumar Patwari	AFVPP3401L
46	Nitin Jain	AEFPJ8101A
47	A K Jain HUF	AADHA7322L
48	Adar Kumar Jain	ADSPJ5280G

49	Gobinda Chandra Pattanaik	AJEPP2669K
50	Ashok Kejriwal HUF	AAFHA5405E
51	Gurcharn Singh Baweja	AAOPB3690D
52	Mahesh Kumar Khetan	AAWPK2620E
53	Sangita Ketriwal	ABTPK2380B
54	Ashok Kumar Kejriwal	ADHPK4175C
55	Sweety Manglani	AGAPM6677R
56	Praveen Goud Adhikam	ACOPA7454Q
57	Sapna Goud Adhikam	ADAPA1398J
58	Ashish Singhanian	BFWPS0721Q
59	Poonam Makin	AEVPM9256K
60	Ramesh Kumar Kedia HUF	AAEHR9181H
61	Saurabh Mittal	ADDPM5232A
62	Kapil Mittal	ADDPM5233B
63	Rekha Ajaykumar Agrawal	AASPA2993A
64	Jyoti Vardhan Sonthalia	AADHJ8034N
65	Sandhya Jain	AAGPJ0189B
66	Neetu Pratap Kalra	AAXPK9087E
67	Abhishek Agarwal	AFTPA0939C
68	Neelam Sonthalia	AKVPS1234K
69	Sangeeta Sachdev	AODPS3657L
70	Vinod Sukhani	AYUPS6072L
71	Rajyavardhan Sonthalia	COKPS7477F
72	Lakshmi Devi	AADPD8227B
73	Sunil Kumar Jain	AAHPJ7196B
74	Sunitha Mundada	ABZPM2965N
75	Ashok Kumar Gadodia	ACEPG3335Q
76	Aashesh Kumar Lalwani	ACLPL9914H
77	Het Ram	AFVPR5490R
78	Saloni Bhalotia	AIKPK2010L
79	Prashant Singh Gaur	APBPG5512R
80	Mohan Sharma	ATUPS1008F

81	Hardik Loknath Gambhir	AWPPG7383P
82	Sunil Kumar Patwari HUF	AANHS6750A
83	Dhruv Gaba	AQNPG3627J
84	Sandeep Mahendrabhai Shah	AADPS4022M
85	Bal Krishna Saraf HUF	AAFHB5197N
86	Neena Gaba	AHQPG7050H
87	Jolly Pathak	AHGPP6057P
88	Sunita Goyal	AAFPG2351M
89	Pratapsinh Ganpatrao Jadhav	AAYPJ1003C
90	Sher Singh Agarwal	AAAHS9623K
91	Dinesh Shersingh Agarwal	AAAPA5629D
92	Shiv Kumar HUF	AABHS3053G
93	Pushpa Rani Nagpal	AABPN0865H
94	Rajendra Neminath Shete	AACHR9687J
95	Sitaram Ashok Kumar HUF	AACHS4243P
96	Ramachandran Ananthan Pothi	AACPP8620K
97	ShersinghAgarwal	AADPA3198C
98	Sarda	AAEHS0587A
99	Sanjay Kumar Agarwal	AAOPA1798H
100	Anand Swaroop Rathi	ABLPR8103M
101	Shiv Kumar Nathany	ABSPN6879P
102	Anshu Agarwal	ABYPA0389D
103	Rajesh Rathi	ACDPR7543Q
104	Nirmala Devi Gadodia	ACEPG3740P
105	Abdul Jabbar Dagli	ACUPD2136L
106	Nilavati Niminath Shete	ACZPS8442H
107	Manisha Rajendra Shete	ACZPS8514N
108	Rajendra Neminath Shete	ACZPS8515P
109	Gaurav Goel	ADYPG0561H
110	Gautam Goel	ADYPG0564C
111	Divesh Agarwal	AEBPA2498H
112	Manju Rathi	AECPR9207C

113	Prakash Chandra Rathi	AECPR9208P
114	Sumanlata Gupta	AEJPG5741F
115	Vipin Shersingh Agarwal	AEZPA0703K
116	Dilipkumar S Jain	AFEPJ8660G
117	Rani Mishra	AGHPM6638B
118	Shweta Mishra	AGHPM6664K
119	Asha Rani Soni	AJEPS8536L
120	Sushila Tiwari	AJEPT8702F
121	Uma Sarda	AKBPS4386G
122	Niranjan Rajendra Shete	BOTPS0314D
KAILASH AUTO GROUP I		
123	Bholebaba Suppliers Pvt. Ltd.	AADCB8132G
124	Keshavah Dealtrade Pvt. Ltd.	AAECK7236R
125	Keshavah Mercantile Pvt. Ltd.	AAECK7235N
126	Realstep Tradecom Pvt. Ltd.	AAGCR4447R
127	Jai Dada Steel Pvt. Ltd.	AACJ3125C
128	Depandable Consultancy Business Kanti Ltd.	AADCD1443J
129	Fortright Consultants Pvt. Ltd.	AACCF2203K
130	Deekay Engineers & Dealers Ltd.	AAACD8823B
131	Pragyan Realty Pvt. Ltd.	AAHCP1157B
132	Huk Wealth Consultants Pvt. Ltd.	AADCH1933R
133	Panchmadhu Projects Pvt. Ltd.	AAHCP0443J
134	Mdbp Marketing Service Pvt. Ltd.	AAGCM0694K
135	Malakar & Das Broking Services Pvt. Ltd.	AAICM6326L
136	Proficient Managerial Solutions Pvt. Ltd.	AAHCP1962C
137	Roselife Residency Pvt. Ltd.	AAGCR4027D
138	Aryanraj Properties Pvt. Ltd.	AALCA5298E
139	Dream Heights Pvt. Ltd.	AACCD9717E
140	Sanket Merchandise Pvt. Ltd.	AARCS3191G
141	Pradipta Kr Barick/ Supercon Realinfra Pvt. Ltd.	AASCS4307H
142	Dhanaasha Developers Pvt. Ltd.	AAECD6470G
143	Tremendous Commodeal Pvt. Ltd.	AAJCA0881H

144	Arrowlink Enclave Arrowlink Enclave Pvt. Limi	AALCA5948F
145	Dhanaseth Properties Pvt. Ltd.	AAECD6471H
146	Profitus Commodities Pvt.Ltd.	AAHCP2079E
147	Casuarina Projects Pvt. Ltd.	AAFCC2180B
148	Sarda Solutions Pvt. Ltd.	AATCS2316K
149	Maxtor Conclave Pvt. Ltd.	AAICM5727H
150	Seguro Construction Ltd.	AASCS9516J
KAILASH AUTO GROUP II		
151	Nirdesh Trading Pvt. Ltd.	AABCN1526E
152	Triala Dealers Pvt. Ltd.	AAECT5548F
153	Cheroot Vanijya Pvt. Ltd.	AAECC9285A
154	Quickscope Dealers Pvt. Ltd.	AANCS8376B
155	Saktimata Marketing Pvt. Ltd.	AARCS1549Q
156	Gainsay Property Pvt. Ltd.	AAFCCG2185A
157	Shivsathi Mercantile Pvt. Ltd.	AASCS6284R
158	Sanmati Goods Pvt. Ltd.	AAICS9154Q
159	Albino Overseas Pvt. Ltd.	AAHCA6112B
160	Levia Trading Pvt. Ltd.	AACCL5027D
161	Camellia Vinimay Pvt. Ltd.	AADCC5732H
162	Reachsmart Construction Pvt. Ltd.	AAGCR4662J
163	Swarnprakash Traders Pvt. Ltd.	AATCS6718D
164	Shallot Vincom Pvt. Ltd.	AARCS5124P
165	Reachsmart Dealtrade Pvt. Ltd.	AAFRCR9881C
166	Expression Dealers Pvt. Ltd.	AACCE5935D
167	Signature Dealtrade Pvt. Ltd.	AAOCS9059G
168	Coral Tradecom Pvt. Ltd.	AADCC6854G
169	Goodpoint Impex Pvt. Ltd.	AAFCCG0606G
170	Rochak Vinimay Pvt. Ltd.	AAGCR8142P
171	Goldensight Traders Pvt. Ltd.	AAFCCG4773J
172	Rochi Dealcom Pvt. Ltd.	AAGCR7017M
173	Sensex Distributors Pvt. Ltd.	AAPCS2057K
174	Sinjan Overseas Pvt. Ltd.	AAMCS8721P

175	Sidhiman Vyapaar Pvt. Ltd.	AATCS3687H
176	Vilohit Property Pvt. Ltd.	AAECV1283F
177	Optimistic Mercantile Pvt. Ltd.	AABCO3684Q
178	Helot Properties Pvt. Ltd.	AACCH8885R
179	Arnab Properties Pvt. Ltd.	AAHCA6172H
180	Vishnudham Marketing Pvt. Ltd.	AAECV4988P
181	Gajgamani Merchandise Pvt. Ltd.	AAFCEG2554B
182	Muchmore Vincom Pvt. Ltd.	AAICM6982C
183	Antaryami Traders Pvt. Ltd.	AALCA7880J
184	Consideration Vincom Pvt. Ltd. Pvt. Ltd.	AAECC2491A
185	Duari Marketing Pvt. Ltd.	AAECD9323N
186	Dreamlight Exim Pvt. Ltd.	AAECD5782B
187	Overarching Dealers Pvt. Ltd.	AABCO6949E
188	Shallot Dealtrade Pvt. Ltd.	AARCS4827R
189	S K Khemka	AFPPK2503Q
190	Goldensight Management Pvt. Ltd.	AAFCEG0066N
191	Mahamani Tradelink Pvt. Ltd.	AAHCM8752F
192	Shallot Tie-Up Pvt. Ltd.	AARCS5133J
193	Rajgharana Agencies Pvt. Ltd.	AAFCEG2462P
194	Mobixa Distributors Pvt. Ltd.	AAICM4750C
195	AriseDealcom Pvt. Ltd.	AAJCA5108R
196	Rangan Vincom Pvt. Ltd.	AAGCR1715E
197	Signet Vinimay Pvt. Ltd.	AAMCS1712Q
198	Kapeeshwar Vintrade Pvt. Ltd.	AAECK7329P
199	Touchwin Commercial Pvt. Ltd.	AAECT1846Q
200	Ladios Trading Pvt. Ltd.	AACCL3868N
201	Katyani Commodities Pvt. Ltd.	AAECK6244R
202	Runicha Merchants Pvt. Ltd.	AAECR0580M
203	Spice Merchants Pvt. Ltd.	AAPCS7492G
204	Core Commodities Pvt. Ltd.	AAECC2931M
PRIMARY ALLOTTEES OF CPAL AND PML		
205	Confident Vanijya Pvt. Ltd.	AADCC5930D

206	Dhandevi Merchandise Pvt. Ltd.	AADCD6493J
207	Fairlink Realtors Consultants Pvt. Ltd.	AABCF6890P
208	Intecity Complex Consultants Pvt. Ltd.	AACCI4596G
209	Luckydhan Dealtrade Pvt. Ltd.	AABCL9100E
210	Mahadhan Vincom Pvt. Ltd.	AAGCM8231Q
211	Pushpdant Tradelink Pvt. Ltd.	AAFCEP7632P
212	Pushpdhara Dealer Pvt. Ltd.	AAFCEP7061C
213	Pushpmala Vinimay Pvt. Ltd.	AAFCEP7062B
214	Ranpriya Tradevin Pvt. Ltd.	AAECR6282Q
215	Safeline Developers Advisory Pvt. Ltd.	AAPCS1176D
216	Saptrishi Agencies Pvt. Ltd.	AAPCS0805H
217	Speedwell Enclave Consultancy Pvt. Ltd.	AAOCS9967P
218	Superdeal Vincom Pvt. Ltd.	AAQCS3088M
219	Timeless Suppliers Pvt. Ltd.	AADCT6337P
220	Dhankuber dealcomm Pvt. Ltd.	AADCD6491L
221	Gannayak Sales Pvt. Ltd.	AAECG0461G
222	Heaven Sales Pvt. Ltd.	AACCH1686G
223	Manikaran Dealtrade Pvt. Ltd.	AAHCM0524B
224	Needful Projects Advisory Pvt. Ltd.	AADCN4461C
225	Panchshul Marketing Pvt. Ltd.	AAFCEP7060D
226	Shivratri Merchants Pvt. Ltd.	AAOCS9331B
227	Solty Dealtrade Pvt. Ltd.	AAPCS2058G
RECIPIENTS OF CPAL AND PML SHARES		
228	Sudhir Jain	ALKPJ3343G
229	Rohit Agarwal	AONPA7646B
230	Anand Sagar Thakur	AEYPT0142A
231	Rudra Prasad Banerjee	AVTPB4409J
232	Stepan Commotrade Pvt. Ltd.	AADCS9460Q
233	Binod Kumar Toshniwal	AFDPT0326E
234	Hanish Toshniwal	AHJPT9222F
235	Santosh Sharma	BFAPS7597Q
236	Needful Vincom Pvt. Ltd.	AADCN3984C

237	Brijdhara Merchantile Pvt. Ltd.	AAECB2629R
238	Overall Vincom Pvt. Ltd.	AABCO1200E
RECIPIENTS OF CPAL/PML SHARES AND KAILASH AUTO GROUP I		
239	Trump Traders Pvt. Ltd. / Ecstatic Traders Pvt. Ltd.	AADCT7498M
240	Shivling Mercantile Pvt. Ltd. / Sonnet Mercantile Pvt. Ltd.	AAOCS9332C
241	Shivratri Tradelinks Pvt. Ltd. / Casuarina Tradelink Pvt. Ltd.	AAOCS7895J
242	Jatadhari Marketing Pvt. Ltd. / Wondrous Marketing Pvt. Ltd.	AACCJ4617K
243	Overflow Mercandise Pvt. Ltd. / Ecstatic Merchandise Pvt. Ltd.	AABCO4034C
244	Sanskriti Vincom Pvt. Ltd. / Pragyan Vincom Pvt. Ltd.	AAPCS2061P
OTHER		
245	Shyam Kanheyalal Vyas	ACTPV2787Q
246	Bharat Bagri HUF	AADHB8488A

32. This order shall come into force with immediate effect. The stock exchanges and the depositories shall ensure that the above directions are strictly enforced.
33. This order is without prejudice to the right of SEBI to take any other action that may be initiated against the aforementioned entities in accordance with law.
34. The persons/entities against whom this *ad interim ex -parte 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 themselves of an opportunity of personal hearing before the Securities and Exchange Board of India, on a date and time to be fixed on a specific request, received from the concerned persons/entities.

-Sd-

DATE: March 29th, 2016

PLACE: MUMBAI

RAJEEV KUMAR AGARWAL

WHOLE TIME MEMBER

SECURITIES AND EXCHANGE BOARD OF INDIA

Annexure A: Kailash Auto Group I and basis of connection amongst them

Sl. No.	Client Name (PAN)	Total no. of shares bought	Basis of Connection
1	Bholebaba Suppliers Pvt. Ltd. (AADCB8132G)	8416130	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 1 and 7 of this table have common phone number, i.e., 9051373100
2	Ecstatic Merchandise Pvt. Ltd. (AABCO4034C)	6252085	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
3	Keshavah Dealtrade Pvt. Ltd. (AAECK7236R)	5698091	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 3 and 26 of this table have common phone number, i.e., 9836835273
4	Keshavah Mercantile Pvt. Ltd. (AAECK7235N)	5504156	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 3, 4, and 22 have common address, i.e., 30, Bentick Street, 3rd Floor, Room No 305, Kolkata 700001
5	Realstep Tradecom Pvt Ltd. (AAGCR4447R)	4850227	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
6	Jai Dada Steel Pvt. Ltd. (AACCJ3125C)	4786922	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
7	Pragyan Vincom Pvt. Ltd. (AAPCS2061P)	3257805	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
8	Depandable Consultancy Business Kanti Ltd. (AADCD1443J)	3170508	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 8, 12 and 15 of this table have common phone number, i.e., 32611685

9	Wondrous Marketing Pvt. Ltd. (AACJ4617K)	2925003	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
10	Sonnet Mercantile Pvt. Ltd. (AAOCS9332C)	2879080	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
11	Fortright Consultants Pvt. Ltd. (AACCF2203K)	2638243	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 11, 14, 17, 18, 32 of this table have common address i.e., T 1, 3rd Floor, Shivam Apartment, House Number 99, A K Road, Near Hotel Srikanta, Guwahati, Assam – 781008.
12	Deekay Engineers & Dealers Ltd. (AAACD8823B)	2275735	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
13	Pragyan Realty Pvt. Ltd. (AAHCP1157B)	2153541	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
14	Huk Wealth Consultants Pvt. Ltd. (AADCH1933R)	2084462	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 6 and 14 of this table have common phone number, i.e., 9775277497
15	Panchmadhu Projects Pvt. Ltd. (AAHCP0443J)	1943622	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 8, 12 and 15 of this table have common phone number, i.e., 32611685
16	Mdbp Marketing Service Pvt. Ltd. (AAGCM0694K)	1838456	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.

17	Malakar & Das Broking Services Pvt. Ltd. (AAICM6326L)	1759551	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 11, 14, 17, 18, 32 of this table have common address i.e., T 1, 3rd Floor, Shivam Appartment, House Number 99, A K Road, Near Hotel Srikanta, Guwahati, Assam – 781008.
18	Proficient Managerial Solutions Pvt. Ltd. (AAHCP1962C)	1279738	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 11, 14, 17, 18, 32 of this table have common address i.e., T 1, 3rd Floor, Shivam Appartment, House Number 99, A K Road, Near Hotel Srikanta, Guwahati, Assam – 781008.
19	Roselife Residency Pvt. Ltd. (AAGCR4027D)	1263156	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 19, 25, 31 and 34 of this table have common address, i.e., 6, Lyons Range, M-17, Kolkata, West Bengal – 700001.
20	Aryanraj Properties Pvt. Ltd. (AALCA5298E)	1098910	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
21	Dream Heights Pvt. Ltd. (AACCD9717E)	1002789	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 8 and 21 of this table have common address, i.e., 4A, Council House Street, MMS Chamber, 1st Floor, Kolkata, West Bengal – 700001.
22	Sanket Merchandise Pvt. Ltd. (AARCS3191G)	993391	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 3, 4, and 22 have common address, i.e., 30, Bentick Street, 3rd Floor, Room No 305, Kolkata 700001
23	Pradipta Kumar Barick/ Supercon Realinfra Pvt. Ltd. (AASCS4307H)	990000	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 15 and 23 have common address, i.e., 9A, Dr. G S Basu Road, Ground Floor, Kolkata West Bengal – 700039
24	Ecstatic Traders Pvt. Ltd. (AADCT7498M)	876264	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
25	Dhanaasha Developers Pvt. Ltd. (AAECD6470G)	850526	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 19, 25, 31 and 34 of this table have common address, i.e., 6, Lyons Range, M-17, Kolkata, West Bengal – 700001.

26	Tremendous Commodeal Pvt. Ltd. (AAJCA0881H)	810467	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
27	Arrowlink Enclave Arrowlink Enclave Pvt. Limi (AALCA5948F)	727400	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
28	Casuarina Tradelink Pvt. Ltd. (AAOCS7895J)	627257	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
29	Dhanaseth Properties Pvt. Ltd. (AAECD6471H)	549850	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 13 and 29 of this table have common phone number, i.e., 9051373399
30	Profitus Commodities Pvt.Ltd (AAHCP2079E)	525004	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
31	Casuarina Projects Pvt. Ltd. (AAFCC2180B)	403465	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 16 and 31 of this table have common phone number, i.e., 8100012345
32	Sarda Solutions Pvt. Ltd. (AATCS2316K)	365000	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 9 and 32 of this table have common phone number, i.e., 8820982870
33	Maxtor Conclave Pvt. Ltd. (AAICM5727H)	311461	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 2, 5, 6, 7, 9, 10, 12, 13, 16, 20, 24, 26, 27, 28, 30 & 33 of this table have common address as 16, Indian Exchange Place, 1st Floor, Kolkata, West Bengal, India – 700001.
34	Seguro Construction Ltd. (AASCS9516J)	300000	As per the UCC data base available with the concerned broker/data provided by BSE, entities of serial number 19, 25, 31 and 34 of this table have common address, i.e., 6, Lyons Range, M-17, Kolkata, West Bengal – 700001.
	Grand Total	7,54,08,295	

Annexure B : Kailash Auto Group II and basis of connection among them

Sl. no.	Client Name	Total no. of shares bought	Basis of connection
1	Nirdesh Trading Pvt. Ltd. (AABCN1526E)	7791670	Off market transaction of Nirdesh Trading Pvt. Ltd. with Shivsathi Mercantile Pvt. Ltd. and Good Point Impex Pvt. Ltd. in the scrip of Surabhi Chemicals Ltd. and Kailash Auto Finance Ltd.
2	Triala Dealers Pvt. Ltd. (AAECT5548F)	7782817	Ram Krishna Bhattacharjee and Sukumar Ghosh are the common directors in Triala Dealers Pvt. Ltd., Helot Properties Pvt. Ltd., Antaryami Traders Pvt. Ltd., Muchmore Vincom Pvt. Ltd., Gajgami Merchandise Pvt. Ltd., Mobixa Distributors Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., and Reachsmart Construction Pvt. Ltd.
3	Cheroot Vanijya Pvt. Ltd. (AAECC9285A)	6924400	Ram Krishna Bhattacharjee and Sukumar Ghosh are the common directors in Triala Dealers Pvt. Ltd., Helot Properties Pvt. Ltd., Antaryami Traders Pvt. Ltd., Muchmore Vincom Pvt. Ltd., Gajgami Merchandise Pvt. Ltd., Mobixa Distributors Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., and Reachsmart Construction Pvt. Ltd.
4	Quickscope Dealers Pvt. Ltd. (AANCS8376B)	5928702	Off market transaction of Quickscope Dealers Pvt. Ltd. with Dreamlight Exim Pvt. Ltd. and Vishnudham Marketing Pvt. Ltd. in the scrip of Suryanagri Finlease Ltd.
5	Saktimata Marketing Pvt. Ltd. (AARCS1549Q)	5852084	Off market transaction of Saktimata Marketing Pvt. Ltd. with Good Point Impex Pvt Ltd., Helot Properties Pvt Ltd., Antaryami Dreamlight Exim Pvt Ltd., Gajgami Merchandise Pvt Ltd., Triala Dealers Pvt Ltd., Rangan Vincom Pvt Ltd., Reachsmart Deal Trade Pvt Ltd., Cheroot Vanijya Pvt Ltd., in the scrip of Kailash Auto Finance and Sunstar Realty Development Ltd.
6	Gainsay Property Pvt. Ltd. (AAF CG2185A)	5331756	Off market transaction of Gainsay Property Pvt. Ltd. Helot Properties Pvt. Ltd., Goodpoint Impex Pvt. Ltd., Shivsathi Mercantile Pvt. Ltd., Overarching Dealers Pvt. Ltd. in the scrip Kailash Auto Finance Ltd.
7	Shivsathi Mercantile Pvt. Ltd. (AASCS6284R)	4438438	Jayanta Bose is the common director in Good Point Impex Pvt. Ltd. and Shivsathi Mercantile Pvt. Ltd.
8	Sanmati Goods Pvt Ltd (AAICS9154Q)	4320750	Off market transaction of Sanmati Goods Pvt Ltd with Sinjan Overseas Pvt Ltd. in the shares of Kailash Auto Finance Ltd.
9	Albino Overseas Pvt Ltd (AAHCA6112B)	4014500	Off market transaction of Albino Overseas Pvt. Ltd. with Kapeeshwar Vintrade Pvt Ltd in the shares of Cressanda Solutions Ltd.
10	Levia Trading Pvt Ltd	3841870	Off market transaction of Levia Trading Pvt Ltd with Core

	(AACCL5027D)		Commodities Pvt. Ltd. in Kappac Pharma Ltd.
11	Camellia Vinimay Pvt. Ltd. (AADCC5732H)	3590494	Off market transaction of Camellia Vinimay Pvt. Ltd. with Helot Properties Pvt. Ltd. in Sunstar Realty Development Ltd. and Life Line Drugs Ltd.
12	Reachsmart Construction Pvt. Ltd. (AAGCR4662J)	3300706	Sukumar Ghosh is the common directors in Reachsmart Construction Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., Core Commodities Pvt Ltd., and Vishnudham Marketing Pvt. Ltd.
13	Swarnprakash Traders Pvt. Ltd. (AATCS6718D)	2900912	Sukumar Ghosh is the common directors in Reachsmart Construction Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., Core Commodities Pvt Ltd., and Vishnudham Marketing Pvt. Ltd.
14	Shallot Vincom Pvt. Ltd. (AARCS5124P)	2651637	Off market transaction of Shallot Vincom Pvt. Ltd. with Shivsathi Mercantile Pvt. Ltd. and Good Point Impex Pvt. Ltd. in the scrip of Sharp Investment Ltd.
15	Reachsmart Dealtrade Pvt. Ltd. (AAFRC9881C)	2541833	Promod Barik is common director in Reachsmart Dealtrade pvt. Ltd., Sebika Commodities Pvt. Ltd. Off market transaction of Reachsmart Dealtrade Pvt. Ltd with Esquire Enclave Pvt. Ltd. , Kingfisher Properties Pvt. Ltd., Shivkhori Construction Pvt. Ltd., Topwell Properties Pvt. Ltd.
16	Expression Dealers Pvt. Ltd. (AACCE5935D)	2516237	Off market transaction with Gajgamani Merchandise Pvt. Ltd., Ladios Trading Pvt. Ltd., Rangan Vincom Pvt. Ltd., Antaryami Traders Pvt. Ltd., Vishnudham Marketing Pvt. Ltd., Dreamlight Exim Pvt. Ltd. in the scrip Kailash Auto Finance Ltd.
17	Signature Dealtrade Pvt. Ltd. (AAOCS9059G)	2297100	Off market transaction of Signature Dealtrade Pvt. Ltd with Triala Dealers Pvt. Ltd., Cheroot Vanijya Pvt. Ltd. in Kailash Auto Finance Ltd.
18	Coral Tradecom Pvt Ltd (AADCC6854G)	1803273	Off market of Coral Tradecom Pvt Ltd with with Cheroot Vanijya Pvt. Ltd. in the scrip of Tuni Textile Ltd. and Global Capital Market Ltd.
19	Goodpoint Impex Pvt. Ltd. (AAFCCG0606G)	1630717	Off market transaction of Good Point Impex Pvt. Ltd with Shivsathi Mercantile Pvt. Ltd. and Shallot Vincom Pvt. Ltd. in the scrip of Sharp Investment Ltd.
20	Rochak Vinimay Pvt. Ltd. (AAGCR8142P)	1564127	Off market transaction of Rochak Vinimay Pvt. Ltd. with Avlokan Dealcom Pvt. Ltd., Ladios Trading Pvt. Ltd., Rangan Vincom Pvt. Ltd., Gajgamani Merchandise Pvt. Ltd., Antaryami Traders Pvt. Ltd. in the scrip of PSIT Infrastructure & Services Ltd., and Splash Media Ltd.
21	Goldensight Traders Pvt. Ltd. (AAFCCG4773J)	1514780	Pratap Chakraborty is one of the common directors of Dhyaneswar Dealers Pvt Ltd and Goldensight Traders Pvt. Ltd.

22	Rochi Dealcom Pvt. Ltd. (AAGCR7017M)	1448300	Off market transaction of Rochi Dealcom Pvt. Ltd. with Avlokan Dealcom Pvt. Ltd., Ladios Trading Pvt. Ltd., Rangan Vincom Pvt. Ltd. in the scrip Jackson Investment Ltd.
23	Sensex Distributors Pvt. Ltd. (AAPCS2057K)	1313840	Off market transaction of Sensex Distributors Pvt. Ltd. with Sanklap Vincom Pvt. Ltd. Scope Vyapar Pvt. Ltd. Runicha Merchants Pvt. Ltd. in the scrip of Concrete Credit Ltd and Pincon Spirit Ltd.
24	Sinjan Overseas Pvt. Ltd. (AAMCS8721P)	1215310	Off market transaction of Sinjan Overseas Pvt. Ltd. with Mahamani Tradelink Pvt. Ltd. in the scrip GCM Capital Advisors Ltd. Biplab Guha is common director in Kapeeshwar Vintrade Pvt. Ltd., Sinjan Overseas Pvt. Ltd. and Mahamani Tradelink Pvt. Ltd.
25	Sidhiman Vyapaar Pvt. Ltd. (AATCS3687H)	1125971	Off market transaction of Sidhiman Vyapaar Pvt. Ltd. with Triala Dealers Pvt Ltd., Helot Properties Pvt. Ltd., and Saktimata Marketing Pvt. Ltd., in the scrip Sunstar Realty Development Ltd.
26	Vilohit Property Pvt. Ltd. (AAECV1283F)	1085480	Off market transaction of Vilohit Property Pvt. Ltd. with Helot Properties Pvt. Ltd., Signet Vinimay Pvt. Ltd. , Esquire Enclave Pvt. Ltd. in the scrip Risorgimento Industrial Company Ltd, Nikki Global Finance Ltd.
27	Optimistic Mercantile Pvt Ltd (AABCO3684Q)	853492	Off market transaction of Optimistic Mercantile Pvt Ltd with Dreamlight Exim Pvt. Ltd., Gajgamani Merchandise Pvt. Ltd. Vishnudham Marketing Pvt. Ltd. in the scrip Sunstar Realty Development Ltd.
28	Helot Properties Pvt. Ltd. (AACCH8885R)	840542	Off market transaction of Helot Properties Pvt. Ltd. with Vilohit Property Pvt. Ltd., Signet Vinimay Pvt. Ltd. , Esquire Enclave Pvt. Ltd. in the scrip Risorgimento Industrial Company Ltd, Nikki Global Finance Ltd.
29	Arnab Properties Pvt. Ltd. (AAHCA6172H)	809424	Off market transaction of Arnab Properties Pvt. Ltd. with Shivsathi Mercantile Pvt. Ltd. and Good Point Impex Pvt. Ltd. in the scrip of Surabhi Chemicals Ltd.
30	Vishnudham Marketing Pvt. Ltd. (AAECV4988P)	805423	Sukumar Ghosh is the common directors in Reachsmart Construction Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., Core Commodities Pvt Ltd., and Vishnudham Marketing Pvt. Ltd. Triala Dealers Pvt. Ltd., Sidhiman Vyapaar Pvt. Ltd., Vishnudham Marketing Pvt. Ltd., and Mobixa Distributors Pvt. Ltd.
31	Gajgamani Merchandise Pvt. Ltd. (AAF CG2554B)	794284	Rabindar Singh Manget is common director in Cheroot Vanijya Pvt. Ltd., Dreamlight Exim Pvt. Ltd., Antaryami Traders Pvt. Ltd., Gajgamani Merchandise Pvt. Ltd.

32	Muchmore Vincom Pvt. Ltd. (AAICM6982C)	606098	Ram Krishna Bhattacharjee and Sukumar Ghosh are the common directors in Triala Dealers Pvt. Ltd., Helot Properties Pvt. Ltd., Antaryami Traders Pvt. Ltd., Muchmore Vincom Pvt. Ltd., Gajgami Merchandise Pvt. Ltd., Mobixa Distributors Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., and Reachsmart Construction Pvt. Ltd.
33	Antaryami Traders Pvt. Ltd. (AALCA7880J)	568418	Ram Krishna Bhattacharjee and Sukumar Ghosh are the common directors in Triala Dealers Pvt. Ltd., Helot Properties Pvt. Ltd., Antaryami Traders Pvt. Ltd., Muchmore Vincom Pvt. Ltd., Gajgami Merchandise Pvt. Ltd., Mobixa Distributors Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., and Reachsmart Construction Pvt. Ltd.
34	Consideration Vincom Pvt Ltd Pvt Ltd (AAECC2491A)	519798	Off market transaction by Consideration Vincom Pvt Ltd Pvt Ltd with Sanklap Vincom Pvt. Ltd. in Ecowave Infotech Ltd.
35	Duari Marketing Pvt. Ltd. (AAECD9323N)	517572	Off market transaction of Duari Marketing Pvt. Ltd. with Antaryami Traders Pvt Ltd. , Sidhiman Vyapaar Pvt Ltd. Gajgami Merchandise Pvt. Ltd. in the scrip of Mahadushi International Trade Ltd.
36	Dreamlight Exim Pvt. Ltd. (AAECD5782B)	478074	Rabindar Singh Manget is common director in Cheroot Vanijya Pvt. Ltd., Dreamlight Exim Pvt. Ltd., Antaryami Traders Pvt. Ltd., Gajgami Merchandise Pvt. Ltd.
37	Overarching Dealers Pvt. Ltd. (AABCO6949E)	460382	Tripurari Dubey is common director in Sebika Commodities Pvt. Ltd., Overarching Dealers Pvt. Ltd., Vilohit Property Pvt. Ltd.
38	Shallot Dealtrade Pvt. Ltd. (AARCS4827R)	444003	Off market transaction of Shallot Dealtrade Pvt. Ltd.. with Shivsathi Mercantile Pvt. Ltd. and Good Point Impex Pvt. Ltd. in the scrip of Sharp Investment Ltd. & Channel Nine Ltd.
39	Sk Khemka (AFPPK2503Q)	431612	Off market transaction of S. K. Khemka has off market transactions with Duari Marketing Pvt. Ltd. Rochak Vinimay Pvt Ltd And Rochi Dealcom Pvt Ltd in the shares of Kailash Auto Finance Ltd.
40	Goldensight Management Pvt Ltd (AAFCCG0066N)	392000	Off market transaction of Goldensight Management Pvt Ltd with Cheroot Vanijya Pvt. Ltd. in the scrip of Lifeline Drugs & Pharma Ltd. and NCL Research and Financial Services Ltd.
41	Mahamani Tradelink Pvt. Ltd. (AAHCM8752F)	392000	Biplab Guha is common director in Kapeeshwar Vintrade Pvt. Ltd., Sinjan Overseas Pvt. Ltd. and Mahamani Tradelink Pvt. Ltd.
42	Shallot Tie-Up Pvt. Ltd. (AARCS5133J)	327873	Off market transaction of Shallot Tie-Up Pvt. Ltd. with Helpful Investment Advisory Pvt. Ltd. and Goodpoint Impex Pvt. Ltd. Shivsathi Mercantile Pvt. Ltd. In The Scrip Sharp Investments Ltd.

43	Rajgharana Agencies Pvt. Ltd. (AAFCR2462P)	320000	Jagdish Agarwal being common director in Rajgharana Agencies Pvt. Ltd., Bahubali forex Pvt. Ltd. & Touchwin Commercial Pvt Ltd.
44	Mobixa Distributors Pvt. Ltd. (AAICM4750C)	278305	Sukumar Ghosh and Bimal Dutta are the common directors in Cheroot Vanijya Pvt. Ltd., Core Commodities Pvt Ltd., Triala Dealers Pvt. Ltd., and Mobixa Distributors Pvt. Ltd.
45	Arise Dealcom Pvt. Ltd. (AAJCA5108R)	271474	Off market transaction of Arise Dealcom Pvt. Ltd. with Signet Vinimay Pvt. Ltd. and Apex Commotrade Pvt. Ltd in the scrip of Concrete Credit Ltd.
46	Rangan Vincom Pvt. Ltd. (AAGCR1715E)	202800	Debendra Das and Sanjay Chatterjee are common director in Rangan Vincom Pvt. Ltd., Ladios Trading Pvt. Ltd.
47	Signet Vinimay Pvt. Ltd. (AAMCS1712Q)	152000	Abhiset Basu & Pradip Dey are common director in Signet Vinimay Pvt. Ltd., Winall Vinimay Pvt. Ltd., Runicha Merchants Pvt. Ltd.,
48	Kapeeshwar Vintrade Pvt. Ltd. (AAECK7329P)	148000	Biplab Guha is common director in Kapeeshwar Vintrade Pvt. Ltd., Sinjan Overseas Pvt. Ltd. and Mahamani Tradelink Pvt. Ltd. .
49	Touchwin Commercial Pvt. Ltd. (AAECT1846Q)	117972	Jagdish Agarwal being common director in Rajgharana Agencies Pvt. Ltd., Bahubali forex Pvt. Ltd. & Touchwin Commercial Pvt Ltd.
50	Ladios Trading Pvt. Ltd. (AACCL3868N)	76500	Debendra Das and Sanjay Chatterjee are common director in Rangan Vincom Pvt. Ltd., Ladios Trading Pvt. Ltd.
51	Katyani Commodities Pvt. Ltd. (AAECK6244R)	64000	Promod Barik is common director in Reachsmart Dealtrade pvt. Ltd., Sebika Commodities Pvt. Ltd. and Katyani Commodities Pvt. Ltd.
52	Runicha Merchants Pvt. Ltd. (AAECC0580M)	37000	Abhiset Basu & Pradip Dey are common director in Signet Vinimay Pvt. Ltd., Winall Vinimay Pvt. Ltd., and Runicha Merchants Pvt. Ltd.
53	Spice Merchants Pvt. Ltd. (AAPCS7492G)	21000	As per the KYC submitted by the trading member 'Calcutta Stock Exchange Ltd' for its clients 'Winall Vinimay Pvt. Ltd. Ltd and Spice Merchants Pvt. Ltd, both the clients have common phone number, i.e., 9836488845
54	Core Commodities Pvt. Ltd. (AAECC2931M)	15000	Sukumar Ghosh is the common directors in Reachsmart Construction Pvt. Ltd., Cheroot Vanijya Pvt. Ltd., Core Commodities Pvt Ltd., and Vishnudham Marketing Pvt. Ltd., Muchmore Vincom Pvt. Ltd
	Grand Total	99672750	

Annexure C - Top Beneficiaries

Sl. No.	Client Name	Client PAN	Total unit sold
1	Rahul Agarwal	AEXPA9696R	5500000
2	Vikas Agrawal	AFBPA9883M	5500000
3	Om Prakash Agarwal	ACIPA3823H	5000000
4	Hitesh Ramprakash Chhatwal	ADSPC4388E	5000000
5	Om Prakash Agarwal HUF	AAAHO5501J	4000000
6	Rajesh Ramswarup Sarda	AHAPS4925M	3000000
7	Shilpa Agarwal	AHQPK3316G	2953500
8	Dharam Paul	ACGPP5575P	2775000
9	Neeraj Kumar	AGVPK7036P	2760000
10	Charanjeet Singh	ADWPS5227Q	2500000
11	Rajesh Ramswarup Sarda HUF	AADHS2286M	2000000
12	Kavita Jain	AANPJ9910B	2000000
13	Sanjeev Jain	ACFPJ3817P	2000000
14	Geetha Jain	ADEPG7030K	2000000
15	Veena Rajesh Sarda	AHAPS4880R	2000000
16	Ramasamy Santhamani	ALJPS3141G	2000000
17	Satish Jain	AAFJP6142B	1875000
18	Dhirajkumar Khetan	AAWPK2634C	1600001
19	Vikrant Kumar Khetan	AAWPK2621F	1600000
20	Gaurav Bhalotia	ADAPB9680Q	1600000
21	Bhagwati Devi Patwari	AEYPP3706L	1540000
22	N. Kanniah	AAHPK8800D	1500000
23	Nikita Agarwal	AOTPA7379H	1500000
24	Sanjib Kumar Patwari HUF	AAPHS3236R	1220000
25	Priyanka Patwari	ALSPK8179K	1220000
26	Sarika Patwari	ABAPL2442E	1166000
27	S K Patwari HUF	AAFHS3391K	1135000
28	Sanjay Kumar Patwari HUF	AASHS7307E	1134000
29	Shaila Patwari	AJFPP4973M	1107051
30	Sanjay Kumar Patwari	AFPPP9576G	1060000
31	Sanjib Kumar Patwari	AFRPP9205L	1060000
32	Ashok Mustapure	AVRPM3683K	1009500
33	Krishna Agrawal	ACHPA6428P	1000000
34	Nand Kishore Agarwal	ACJPA2410P	1000000
35	Kuldeep Jaiswal	ACVPJ4561C	1000000
36	Amit Jain	AEFPJ8100B	1000000
37	Sajjan Kumar Patwari	AEYPP3705K	1000000
38	Pratap Uttam Purohit	AFZPP9994A	1000000
39	Chandadevi Ramswarup Sarda	AHAPS4924L	1000000
40	Kanchan Jain	AAHPJ9207D	993500

41	Sunil kumar Patwari	AFVPP3401L	990000
42	Nitin Jain	AEFPJ8101A	961000
43	A K Jain HUF	AADHA7322L	943048
44	Adar Kumar Jain	ADSPJ5280G	916193
45	Gobinda Chandra Pattanaik	AJEPP2669K	825951
46	Ashok Kejriwal HUF	AAFHA5405E	800000
47	Gurcharn Singh Baweja	AAOPB3690D	800000
48	Mahesh Kumar Khetan	AAWPK2620E	800000
49	Sangita Ketriwal	ABTPK2380B	800000
50	Ashok Kumar Kejriwal	ADHPK4175C	800000
51	Sweety Manglani	AGAPM6677R	800000
52	Praveen Goud Adhikam	ACOPA7454Q	750000
53	Sapna Goud Adhikam	ADAPA1398J	750000
54	Ashish Singhania	BFWPS0721Q	740000
55	Poonam Makin	AEVPM9256K	713000
56	Ramesh Kumar Kedia HUF	AAEHR9181H	700000
57	Saurabh Mittal	ADDPM5232A	700000
58	Kapil Mittal	ADDPM5233B	700000
59	Rekha Ajaykumar Agrawal	AASPA2993A	650000
60	Jyoti Vardhan Sonthalia	AADHJ8034N	625000
61	Sandhya Jain	AAGPJ0189B	625000
62	Neetu Pratap Kalra	AAXPK9087E	625000
63	Abhishek Agarwal	AFTPA0939C	625000
64	Neelam Sonthalia	AKVPS1234K	625000
65	Sangeeta Sachdev	AODPS3657L	625000
66	Vinod Sukhani	AYUPS6072L	625000
67	Rajyavardhan Sonthalia	COKPS7477F	625000
68	Lakshmi Devi	AADPD8227B	600000
69	Sunil Kumar Jain	AAHPJ7196B	600000
70	Sunitha Mundada	ABZPM2965N	600000
71	Ashok Kumar Gadodia	ACEPG3335Q	600000
72	Aashesh Kumar Lalwani	ACLPL9914H	600000
73	Het Ram	AFVPR5490R	600000
74	Saloni Bhalotia	AIKPK2010L	600000
75	Prashant Singh Gaur	APBPG5512R	600000
76	Mohan Sharma	ATUPS1008F	600000
77	Hardik Loknath Gambhir	AWPPG7383P	600000
78	Sunil Kumar Patwari HUF	AANHS6750A	580000
79	Dhruv Gaba	AQNPG3627J	575000
80	Sandeep Mahendrabhai Shah	AADPS4022M	565000
81	Bal Krishna Saraf HUF	AAFHB5197N	550000
82	Neena Gaba	AHQPG7050H	550000
83	Jolly Pathak	AHGPP6057P	530000

84	Sunita Goyal	AAFPG2351M	518000
85	Pratapsinh Ganpatrao Jadhav	AAYPJ1003C	513373
86	Sher Singh Agarwal	AAHS9623K	500000
87	Dinesh Shersingh Agarwal	AAAPA5629D	500000
88	Shiv Kumar HUF	AABHS3053G	500000
89	Pushpa Rani Nagpal	AABPN0865H	500000
90	Rajendra Neminath Shete	AACHR9687J	500000
91	Sitaram Ashok Kumar HUF	AACHS4243P	500000
92	Ramachandran Ananthan Pothe	AACPP8620K	500000
93	Shersingh Agarwal	AADPA3198C	500000
94	Sarda	AAEHS0587A	500000
95	Sanjay Kumar Agarwal	AAOPA1798H	500000
96	Anand Swaroop Rathi	ABLPR8103M	500000
97	Shiv Kumar Nathany	ABSPN6879P	500000
98	Anshu Agarwal	ABYPA0389D	500000
99	Rajesh Rathi	ACDPR7543Q	500000
100	Nirmala Devi Gadodia	ACEPG3740P	500000
101	Abdul Jabbar Dagli	ACUPD2136L	500000
102	Nilavati Neminath Shete	ACZPS8442H	500000
103	Manisha Rajendra Shete	ACZPS8514N	500000
104	Rajendra Neminath Shete	ACZPS8515P	500000
105	Gaurav Goel	ADYPG0561H	500000
106	Gautam Goel	ADYPG0564C	500000
107	Divesh Agarwal	AEBPA2498H	500000
108	Manju Rathi	AECPR9207C	500000
109	Prakash Chandra Rathi	AECPR9208P	500000
110	Sumanlata Gupta	AEJPG5741F	500000
111	Vipin Shersingh Agarwal	AEZPA0703K	500000
112	Dilipkumar S Jain	AFEPJ8660G	500000
113	Rani Mishra	AGHPM6638B	500000
114	Shweta Mishra	AGHPM6664K	500000
115	Asha Rani Soni	AJEPS8536L	500000
116	Sushila Tiwari	AJEPT8702F	500000
117	Uma Sarda	AKBPS4386G	500000
118	Niranjan Rajendra Shete	BOTPS0314D	500000
	Total		12,73,29,117

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RAJEEV KUMAR AGARWAL
WHOLE TIME MEMBER

DATE: March 29th, 2016

PLACE: MUMBAI

SECURITIES AND EXCHANGE BOARD OF INDIA