

BEFORE THE ADJUDICATING OFFICER
SECURITIES AND EXCHANGE BOARD OF INDIA
[ADJUDICATION ORDER NO. Order/AK/DS/2025-26/31761-31780]
UNDER SECTION 15-I OF THE SECURITIES AND EXCHANGE BOARD OF INDIA
ACT, 1992 READ WITH RULE 5 OF SEBI (PROCEDURE FOR HOLDING INQUIRY
AND IMPOSING PENALTIES) RULES, 1995, IN RESPECT OF;

Noticee No.	Noticee Name	PAN
1	M/s Chandrima Mercantiles Limited	AABCC1666J
2	Mr. Pranav Kamleshkumar Trivedi	AWQPT8856R
3	Mr. Nayan Mahendrabhai Thakkar	BYHPT2277A
4	Mr. Kuntal Jitendra Trivedi	AKNPT2945A
5	Mr. Jigneshkumar P. Patel	AQEPP8019J
6	Mr. Rohit Bairwa	ELYPB0179Q
7	Mr. Ankit Ajitbhai Panchal	ECSP4637J
8	Mr. Hardik Himmatbhai Munjpara	AULPM8809N
9	Mr. Jagdish Chhanabhai Vaghela	AFPPV2562Q
10	Ms. Usha Devi	AEXPU5745D
11	Mr. Parth Rajanikant Pandya	FGMPP6491K
12	Mr. Manish Jethabhai Bhaskar	DHEPB7576N
13	Mr. Nitinkumar Lalji Bhai Bharvad	DWAPB3135C
14	Mr. Babubhai Bhikhaji Godha	BALPG5393L
15	Ms. Narmadaben Pravinbhai Parmar	DQEPP6650L
16	Mr. Pravinbhai Lakhabhai Parmar	DQEPP6651M
17	Ms. Shvetalben Sagarbhai Dataniya	CQGPD5278K
18	Mr. Sagarkumar P. Dataniya	BJIPD7414F
19	Mr. Mrugesh Natwarlal Ruparel	AITPR2718M
20	Mr. Arpit Piyushbhai Shah	BECPS1043E

In the matter of

Price and volume manipulation in the scrip of Quasar India Limited

1. Securities and Exchange Board of India (hereinafter referred to as “**SEBI**”) conducted investigation in the matter of price and volume manipulation in the scrip of Quasar India Limited (hereinafter referred to as “**Quasar**” / “**the Company**”) during the period beginning May 01, 2022 till December 31, 2023 (hereinafter referred to as “investigation period” / “IP”) to find violations of provisions of SEBI Act, 1992 and SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (hereinafter referred to as “**PFUTP Regulations**”), if any.

APPOINTMENT OF ADJUDICATING OFFICER

2. Upon being satisfied that the Noticees have violated various applicable provisions, SEBI initiated adjudication proceedings against the Noticees u/s 15-I(1) of SEBI Act and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (hereinafter referred to as “**SEBI Adjudication Rules**”) r/w Section 19 of SEBI Act and appointed the undersigned as the Adjudicating Officer (**AO**), vide Order dated December 10, 2024 u/s 15-I(1) of the SEBI Act, and Rule 3 of SEBI Adjudication Rules r/w Section 19 of the SEBI Act, to inquire into and adjudge u/s 15HA and 15A(a) of SEBI Act, the violations of provisions of SEBI Act and PFUTP Regulations, alleged to have been committed by the Noticees, as under;

Noticee No.	Noticee Name	Under Section
1	M/s Chandrima Mercantiles Limited	Section 15HA of SEBI Act, 1992
2	Mr. Pranav Kamleshkumar Trivedi	
3	Mr. Nayan Mahendrabhai Thakkar	
4	Mr. Kuntal Jitendra Trivedi	
5	Mr. Jigneshkumar P. Patel	
6	Mr. Rohit Bairwa	
7	Mr. Ankit Ajitbhai Panchal	
8	Mr. Hardik Himmatbhai Munjpara	
9	Mr. Jagdish Chhanabhai Vaghela	
10	Ms. Usha Devi	
11	Mr. Parth Rajanikant Pandya	

Noticee No.	Noticee Name	Under Section
12	Mr. Manish Jethabhai Bhaskar	
13	Mr. Nitinkumar Lalji Bhai Bharvad	
14	Mr. Babubhai Bhikhaji Godha	
15	Ms. Narmadaben Pravinbhai Parmar	
16	Mr. Pravinbhai Lakhabhai Parmar	
17	Ms. Shvetaiben Sagarbhai Dataniya	
18	Mr. Sagarkumar P. Dataniya	
19	Mr. Mrugesh Natwarlal Ruparel	Section 15HA and 15A(a) of SEBI Act, 1992
20	Mr. Arpit Piyushbhai Shah	

(These persons are hereinafter referred to by their respective names / respective Noticee numbers given in the table above, and collectively referred to as “**the Noticees/ Entities**”).)

SHOW CAUSE NOTICE, REPLY OF THE NOTICEE AND HEARING

3. Show Cause Notice (hereinafter referred to as “**SCN**”) dated January 29, 2025 was issued to the Noticees in terms of rule 4 of SEBI Adjudication Rules, to show cause as to why inquiry should not be held against them and why penalty, if any, be not imposed on them u/s 15HA and 15A(a) of SEBI Act, as applicable.
4. Summary of the allegations made in the SCN is as under:
 - 4.1. Total 18 suspected entities, connected to each other, were found to be manipulating the scrip of Quasar by contributing to the artificial volume and subsequent rise in price in the scrip. Out of the 18 suspected entities, 8 of the suspected entities acquired more than 1% shares of Quasar in public category and rest of them aided and abetted the said entities (1% shareholders in public category) to dump their shares of Quasar and subsequently manipulate the scrip of Quasar. During investigation period, few suspected entities also indulged in circular trading and after manipulating the scrip of Quasar, almost all the 18 suspected entities squared off their entire shareholding and exited the scrip of Quasar.

- 4.2. Investigation concluded that one of the suspected entity, Noticee 2 viz. Mr. Pranav Kamleshkumar Trivedi along with Noticee 19 (Mr. Mrugesh Natwarlal Ruparel) and Noticee 20 (Mr. Arpit Piyushbhai Shah) was operating the trading and banking accounts of the 18 suspected entities for trading in the scrip of Quasar. Further, the suspected entities in collusion with Noticees 2, 19 and 20 manipulated the scrip of Quasar by lending their trading and bank accounts. Thus, all of them together manipulated the scrip of Quasar by generating high volumes and subsequent rise in price in the scrip of Quasar. The artificial increase in high volume and price misled the retail investors and influenced them to invest in the shares of Quasar and such act could prove detrimental for the securities market.
- 4.3. Thus, 18 suspected entities, i.e. Noticees 1 to 18 were alleged to be in violation of provisions of Section 12A (a), (b) and (c) of SEBI Act, 1992 read with Regulations, 3(a), (b), (c), (d), 4(1), 4(2)(a), 4(2)(b) and 4(2)(e) of PFUTP Regulations and Noticees 19 and 20 were alleged to be in violation of Section 12A (a), (b) and (c) of SEBI Act read with Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a) of PFUTP Regulations, by aiding and abetting Noticee 2 in manipulating the scrip of Quasar.
- 4.4. Further, based on the findings of investigation, it was alleged that Noticees 2, 3, 5, 7, 11, 12, 13, 15 and 16 have violated the provisions of section 12A (a), (b) and (c) of SEBI Act, 1992 r/w Regulations 3 (a), (b), (c) and (d), 4(1), 4(2)(g) and 4(2)(n) of PFUTP Regulations, as it was observed that these Noticees had indulged in circular trades in the scrip of Quasar on three days during Patch 2 and had contributed around 21%, 68% and 11% respectively, of volume to total market volume on three days by trading among themselves without intending to change the ownership of shares and provide a false appearance of trading in scrip in order to inflate or cause fluctuations in the price of share of Quasar and thereby have created artificial volume in the scrip of Quasar.
- 4.5. Further, Noticees 19 and 20 did not appear for statement recording even after issuing summons multiple times which hampered the process of investigation

in ascertaining more facts and information and thus, both have violated provision of Sec 11C(3) of SEBI Act.

5. The SCN was duly delivered to Noticees 1, 2, 4, 6, 7, 8, 9, 11, 12, 13, 16, 17, 18 and 19 through SPAD, and to all the Noticees through digitally signed email dated January 30, 2025. As the SPAD had returned undelivered from the addresses of Noticees 3, 5, 10, 14, 15 and 20, affixture of SCN was attempted at their respective communication address on April 7 and 8, 2025. The SCN was affixed/ hand delivered to Noticees 3, 10, 15 and 20. As the SCN was not delivered to Noticees 5 and 14 through hand delivery/ affixture, delivery was made to them by way of public notice. The SCN was serviced in terms of Rule 7(3) of SEBI Adjudication Rules by publishing on September 02, 2025 in The Times of India (English Newspaper), Gujarat Vaibhav (Hindi Newspaper), Sandesh Ahmedabad Express (Gujarati Newspapers).
6. Noticees 1 and 2 submitted their reply vide email dated March 04, 2025. No response has been received from Noticees 3 to 20 as on date. I note that no prejudice has been caused to Noticees 3 to 20 and that the principle of natural justice has been duly followed in the matter. I am, therefore, inclined to take a view that Noticees 3 to 20 have nothing to submit in the matter.
7. The submissions made by Noticees 1 and 2 are summarized below:
 - 7.1. *Noticee 2 is the CFO and MD of Noticee 1.*
 - 7.2. *The percentage of total shares traded in the scrip by Noticee 1 was merely 1.27%, and my personal trading in the scrip accounted for less than 1% of the total market volume. These figures, when viewed in the broader context of the total trading activity of the scrip, are inconsequential. It is simply implausible that such minimal activity from Noticees 1 and 2 could have any material impact on the price or volume of the scrip.*
 - 7.3. *Noticees 1 and 2 are active participants in securities markets. The scrip of M/s Quasar India Limited appeared to offer such an opportunity. Based on Noticee 2's understanding of the stock market and after detailed discussions with the board*

members of Noticee 1, it was decided that both the company and Noticee 2 would seize this opportunity to diversify their trades and invest in the said scrip.

- 7.4. *The investment and trading decisions were made based on market dynamics, technical analysis, and potential intraday price movements that were observed at that time. It is crucial to emphasize that these were not speculative trades or part of any manipulation scheme. Rather, they were regular intraday trades executed with the intention of capitalizing on fluctuations in the scrip's price, a practice that is standard in the stock market.*
- 7.5. *Noticees 1 and 2 did not had any direct or indirect contact with the promoters, management, or major shareholders of M/s Quasar India Limited. Thier trading activity in the scrip was entirely independent of any internal corporate affairs of Quasar India Limited. There was no collusion or any kind of cooperation with the management or shareholders of the company in question.*
- 7.6. *One of the primary reasons for engaging in the trades of M/s Quasar India Limited was the higher trading volumes observed on certain days. As any seasoned trader would know, market liquidity is a critical factor when executing intraday trades. Their trading activity was conducted on days when the volumes were sufficiently high, which is a common strategy employed by traders to ensure the execution of their trades without disrupting the market.*
- 7.7. *It is well known that traders seek opportunities in stocks with higher volumes to execute their trades efficiently. This is a routine strategy to maximize returns and minimize risks in any market. For SEBI to question the nature of these trades, merely on the basis of higher volumes on certain days, is not only perplexing but also raises concerns about the fairness of regulatory scrutiny. Higher trading volume does not equate to market manipulation; rather, it reflects market participants responding to favourable conditions. I would like to highlight that I, along with M/S Chandrima Mercantiles Limited, engaged in trading purely on the basis of market liquidity and the opportunity presented by price movements within the scope of normal market dynamics. These actions are entirely consistent with the behaviour of any prudent investor or trader in the stock market.*

8. In the interest of natural justice, Noticees 1, 2, 4, 6, 7, 8, 9, 11, 12, 13, 16, 17, 18 and 19 were granted an opportunity of hearing. Vide notice dated March 06, 2025, they were granted hearing on March 13, 2025, which was duly delivered to these Noticees. Since no response was received from Noticees 3, 5, 10, 14, 15 and 20, to whom the SCN was delivered through hand delivery / affixture / public notice, despite due opportunity, the necessity of granting a personal hearing did not arise.
9. Noticees 1 and 2 appeared for the scheduled hearing through their AR. The AR reiterated the submissions already made, vide email dated March 04, 2025, and also made additional submissions, which they submitted in writing on April 15, 2025.
10. The additional submissions are summarized below.
- 10.1. *In order to allege the creation of artificial price and volume in the market, it is imperative to show that parties carrying out the trades were connected to each other, or at least shared a common objective of creating artificial volume. However, in the present case, no connection is shown with any counterparties. Transferring of funds to other counterparties does not mean that Noticees 1 and 2 are connected to them. The transferring of funds was in relation to genuine business transaction, therefore, no illegality can be assumed or alleged on the same. Further, it is also impossible to know the identities of the counterparties in a screen based trading system. A serious charge of fraud and manipulation cannot be levelled on the possibility of suspicion.*
- 10.2. *The counterparties were not known to Noticees 1 and 2 and trades were executed in the normal course of business, devoid of any malafide intentions.*
- 10.3. *In this regard, Noticees 1 and 2 referred and relied upon the judgements of Hon'ble SAT in the matter of M/S. Jagruti Securities Limited, Vintel Securities Pvt. Ltd dated November 23, 2009 (Appeal No. 219/2009), Nishith M Shah HUF dated January 16, 2020 (Appeal No. 97 of 2019).*
- 10.4. *Nothing has been shown in the SCN to allege collusion between the Noticees, and no evidence has been placed on record to show that the action of Noticees 1 and 2 were fraudulent in any manner.*

- 10.5. *It is alleged that Noticee 2 had executed circular trades during patch 2 of the IP, on March 14, 2023. It is submitted that Noticee 2 had bought 545 shares from Ankit Ajitbhai at 13:00 PM. When Noticee 2 was seller side, he traded around 42 times for 981 quantity i.e. before 11 am, and his trade with Nayan was at around 10:44 am. It appears that SEBI has merged two independent trades, which has nothing to do with circular trades.*
- 10.6. *The SCN is not substantiated by any evidence or material on record. In so far as the Noticees is concerned, the charges are based on surmises and conjectures and on the wild allegation of having carried out collusive trading, the impact of which on securities market have not been shown in the Notice. It is submitted that on such a charge alone no action can be taken against the Noticees. To make any one liable for any commission or omission to visit adverse consequence, there should be adequate justification and, in the absence, thereof any punishment meted to him will be unsustainable*
- 10.7. *In and around April 2022 to December, 2023, there were hearsay news in the Agricultural Produce Market Committee (APMC market), Quasar was going to be acquired by Shah group (commodity merchant based in Ahmedabad, Gujarati), and it appears that based on the said news, most of people who are working and has day to day business in the APMC market like us, commission agent, trader, farmer and other, has traded in the said scrip.*
- 10.8. *Noticees 1 and 2 had bought and sold the shares from their own fund, when there was news they had brought the shares, and when they came to know that the company is not in acquisition then they sold the shares. The said trading was in the normal course of business only.*
- 10.9. *With respect to the fund transactions with the proprietorship firms, namely M/s Vinit Enterprises, M/s Sara Enterprises, M/s Rajni Enterprises, M/s Sahjanand Trading Co., and M/s Vishwakarma Trading Co., as well as other partnership/ proprietorship firms and companies, Noticees 1 and 2 maintain business relations with these entities for the trading of agricultural products. The said fund transactions were therefore business-related transaction, and have submitted certain bills in support of their submissions.*

- 10.10. *Noticees do not own or control any MAC address through which could have traded in the scrip. Therefore, Noticees have no comments to offer on the matter. A MAC address does not disclose who actually has possession of the device, therefore, directly alleging that the said trades executed by the Noticees is illegal and not tenable under law.*
- 10.11. *At present, Ahmedabad covers an area of 505 kms and the range of a network tower can vary wide in the big city where by the tower location can covers the range of a network tower, also known as its coverage area or size, can vary based on several factors such as the type of tower, its location, and the frequency band it uses. Within this range, the location of the IPS can be tracked. Given the extensive coverage area of the network, which spans from 1 to 12 miles, Noticees 1 and 2 fail to understand that how the location of the Noticees office and address is relevant or determinable for the IPS in question, as the networks coverage area extends over a broad range in which any location within that can potentially be traced.*
- 10.12. *Para nos. 46.3 and 46.4 of the SCN deal with the details of internet banking login IPS received from IDBI Bank and Axis bank wherein the IPs have a common mobile no. '6358042132' in the name of a person viz. 'Mr. Shaikh Mohammed Asif' and the tower location of this mobile no. was the same tower location address as the office address of Noticees. In this regard, it is submitted that, firstly, it has been erroneously concluded, based solely on the tower location of the common mobile number, that the bank accounts of the 11 suspected entities were operated from the Noticee's office address. Further, it is submitted that, the location of network towers spans a broad geographical area, and it is entirely plausible that the individual was located at or present at the same location or nearby location. Further, the allegation based on the same tower location was purely contradictory and conceptual as SEBI's Investigation team can call the individual for the investigation, however, instead of calling Amit, Shaikh and another person, SEBI has made up their mind that allege numbers are belonging to same person i.e. Noticees.*
- 10.13. *Noticee 2 had Calls/SMS interactions with Mr. Sagar Kumar Dataniya ("Noticee 18") concerning commodity trades, as Noticee 18 is merely a mercantile agent.*

Furthermore, there were no financial transactions or trade activities between Noticees 1 and 2 and Noticee 18.

- 10.14. *Para nos. 56 and 56.4 of the SCN deal with the observations from the overall Geo-analysis of three locations. In this regard, it is denied that the said mobile number are at same geo location, since geo location is not exact and does not show specific location data, and based on the said assumption and coming to the conclusion that it is the Noticee no. 1 office location is incorrect.*
- 10.15. *Para nos. 57 to 59 of the SCN deal with the statements of Noticees and Mr. Gaurav Bachani. With regard to this, it is submitted that Noticee no. 2, out of his fear and nervousness, has given the said statement that "he doesn't know about the company and its financial transactions". He has given all the financial and trade details in this reply.*
11. Noticees 3 to 20 neither did not submit their replies to the SCN. Noticees 4, 6, 7, 8, 9, 11, 12, 13, 16, 17, 18 and 19, to whom hearing was granted, did not avail the opportunity of personal hearing provided to them.
12. In this regard, I note that the Hon'ble SAT in the matter of Classic Credit Ltd. vs. SEBI (Appeal No. 68 of 2003 decided on December 08, 2006) has, inter alia, observed that, "*.....the appellants did not file any reply to the second show-cause notice. This being so, it has to be presumed that the charges alleged against them in the show cause notice were admitted by them*".
13. Further, the Hon'ble SAT in the matter of Sanjay Kumar Tayal & Others vs SEBI (Appeal No. 68 of 2013 decided on February 11, 2014), has also, inter alia, observed that: "*..... appellants have neither filed reply to show cause notices issued to them nor availed opportunity of personal hearing offered to them in the adjudication proceedings and, therefore, appellants are presumed to have admitted charges leveled against them in the show cause notices...*"
14. In view of the observations made by Hon'ble SAT, I find no reason to take a different view and accordingly, in terms of Rule 4(7) of SEBI Adjudication Rules,

the matter is being proceeded ex-parte so far as Noticees 3 to 20 are concerned, on the basis of material available on record.

CONSIDERATION OF ISSUES AND FINDINGS

15. Considering the allegations made out in the SCN and the submissions made by the Noticee, I find that following issues require consideration in the present case:

ISSUE I - Whether the Noticees have violated the provisions of SEBI Act and PFUTP Regulations, as alleged in the SCN?

ISSUE II - Do the violations, if any, attract penalty u/s 15HA and Section 15A(a) of the SEBI Act, as applicable?

ISSUE III - If so, what should be the monetary penalty that can be imposed taking into consideration the factors mentioned in Section 15J of SEBI Act?

16. The said provisions under which violations are alleged against the Noticees are reproduced below –

SEBI Act, 1992

Investigation.

11C (3) The Investigating Authority may require any intermediary or any person associated with securities market in any manner to furnish such information to, or produce such books, or registers, or other documents, or record before him or any person authorised by it in this behalf as it may consider necessary if the furnishing of such information or the production of such books, or registers, or other documents, or record is relevant or necessary for the purposes of its investigation.

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;

SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003

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 manipulative, fraudulent or an unfair trade practice in securities markets.

Explanation.— For the removal of doubts, it is clarified that any act of diversion, misutilisation or siphoning off of assets or earnings of a company whose securities are listed or any concealment of such act or any device, scheme or artifice to manipulate the

books of accounts or financial statement of such a company that would directly or indirectly manipulate the price of securities of that company shall be and shall always be deemed to have been considered as manipulative, fraudulent and an unfair trade practice in the securities market.

(2) Dealing in securities shall be deemed to be a fraudulent or an unfair trade practice if it involves any of the following:—

(a) knowingly 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 including, influencing or manipulating the reference price or bench mark price of any securities;

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

(n) circular transactions in respect of a security entered into between persons including intermediaries to artificially provide a false appearance of trading in such security or to inflate, depress or cause fluctuations in the price of such security;

17. I now proceed to deal with the issues on merits as under:

ISSUE I - Whether Noticees 1 and 2 have violated the provisions of Regulation Section 12A(a), (b) & (c) of SEBI Act r/w Regulation 3(a), 3(b), 3(c), 3(d) and 4 (1) of PFUTP Regulations?

18. From the SCN, I note that the Noticees are alleged to have violated aforesaid provisions of SEBI Act and PFUTP Regulations as Noticees 1, 3 to 18 aided and abetted Noticees 2, 19 and 20 for manipulating the scrip of Quasar by lending their trading and bank accounts and thus, were involved in fraud of manipulating the scrip of Quasar. Further, Noticees 2, 3, 5, 7, 11, 12, 13, 15 and 16 had indulged in circular trades in the scrip of Quasar on three days during Patch 2 and had

contributed around 21%, 68% and 11% of volume to total market volume on three days by trading among themselves without intending to change the ownership of shares and provide a false appearance of trading in scrip in order to inflate or cause fluctuations in the price of share of Quasar and thereby created artificial volume in the scrip of Quasar. In addition, it has been alleged that Noticees 19 and 20 have violated the provisions of Section 11C(3) of SEBI Act as they did not appear for statement recording even after summons were issued to them on July 31, 2024, September 26, 2024 and October 03, 2024, which hampered the process of investigation in ascertaining more facts and information.

19. Noticees 1 to 18 were considered as suspected entities during the investigation.

20. Based on the trading pattern of the said 18 entities, the entire IP was divided into three Patches. The summary of price volume movement in the scrip of Quasar during the IP is provided below:

Particulars	Period	Opening Price in Rs. (volume) on first day of the period	High price in Rs. (volume) on last day of the period	Low price(volume) during the period	Closing Price (volume) during the period	Avg. no. of (shares) traded daily during the period
Prior investigation period	Feb 01, 2022 to April 30, 2022	12.31 (448) 2022-02-07	10.26 (1000) 2022-04-18	10.26 (1000) 2022-04-18	10.26	1,128
During investigation Period	Patch 1 May 01, 2022 to Mar 09, 2023	9.8(5000) 2022-05-02	8.65(1010) 2023-03-06	5.75(1) & 5.75 (100090) 2022-07-05 & 2022-07-06	8.65	14,335
	Patch 2 Mar 10, 2023 to May 11, 2023	8.65(5) 2023-03-10	42.36 (231602) 2023-05-11	8.65 (5) & 8.65 (500) 2023-03-10 & 2023-03-13	38.45	69,932
	Patch 3 May 12, 2023 to Dec 31, 2023	36.53 (3704) 2023-05-12	19.2 (36479) 2023-12-29	16.89 (92455) 2023-12-13	19.14	36,738
Post investigation period	Jan 01, 2024 to Mar 31, 2024	19.5 (287635) 2024-01-01	14 (45520) 2024-03-28	12.12 (24448) 2024-03-20	13.75	1,04,165

21. Following commonalities were observed from the analysis of the information pertaining to Know Your Customer (KYC)/Account Opening Form (AOF) sought from the respective brokers and banks of the 18 entities:

Noticee No.	Entity Name	Common Mobile Number /Email id/Home Address
1	M/s Chandrima Mercantiles Limited	Common Mobile Number Noticee 2 is MD & CEO of M/s Chandrima Mercantiles Limited (Noticee 1)
2	Mr. Pranav Kamleshkumar Trivedi	
18	Mr. Sagarkumar Pravinchandra Dataniya	Common Home Address. Noticee 18 is husband of Noticee 17
17	Ms. Shvetalben Sagarbhai Dataniya	
16	Mr. Pravinbhai Lakhabhai Parmar	Common Home Address. Noticee 16 is husband of Noticee 15
15	Ms. Narmadaben Pravinbhai Parmar	

22. I note that 9 entities, i.e. Noticees 2, 3, 4, 5, 7, 8, 9, 10 and 14 opened their bank accounts in same branch of IDBI Bank and 4 entities, i.e. Noticees 11, 12, 15 and 16 opened their bank account in the same branch of Karur Vysya Bank.

23. The summary of trading by the entities in scrip of Quasar during IP is provided in the table below:

Noticee No.	Entities	Buy Traded Qty	%Buy Trade Qty	Sell Traded Qty	%Sell Trade Qty	Total Buy Value	Total Sell Value
1	M/s Chandrima Mercantiles Limited	2,15,184	2.43%	2,15,184	2.43%	39,48,264	63,17,444
7	Mr. Ankit Ajitbhai Panchal	1,09,355	1.24%	1,09,355	1.24%	8,84,302	28,00,575
3	Mr. Nayan Mahendrabhai Thakkar	92,898	1.05%	92,898	1.05%	8,49,421	16,80,571
5	Mr. Jigneshkumar Patel	83,967	0.95%	83,967	0.95%	10,05,010	23,99,458
11	Mr. Parth Rajanikant Pandya	81,328	0.92%	81,328	0.92%	13,48,258	17,53,523
16	Mr. Pravinbhai Lakhabhai Parmar	76,328	0.86%	76,328	0.86%	12,79,093	16,49,675
18	Mr. Sagarkumar Dataniya	74,511	0.84%	74,511	0.84%	21,90,461	21,21,027
6	Mr. Rohit Bairwa	66,461	0.75%	64,792	0.73%	6,72,979	19,08,832
14	Mr. Babubhai Bhikhaji Godha	30,461	0.34%	30,431	0.34%	5,39,595	5,67,374
17	Ms. Shvetalben Dataniya	28,146	0.32%	28,146	0.32%	7,72,395	7,26,504
10	Ms. Usha Devi	23,804	0.27%	23,786	0.27%	8,25,549	7,23,511
2	Mr. Pranav Kamleshkumar Trivedi	15,545	0.18%	15,545	0.18%	1,37,549	2,01,000

Noticee No.	Entities	Buy Traded Qty	%Buy Trade Qty	Sell Traded Qty	%Sell Trade Qty	Total Buy Value	Total Sell Value
4	Mr. Kuntal Jitendra Trivedi	2,30,200	2.60%	2,75,200	3.11%	18,98,591	47,14,997
8	Mr. Hardik Himmatbhai Munjpara	70,423	0.80%	2,20,423	2.49%	4,88,376	44,94,763
9	Mr. Jagdish Chhanabhai Vaghela	85,415	0.97%	2,49,237	2.82%	6,14,429	61,60,416
15	Ms. Narmadaben Pravinbhai Parmar	81,328	0.92%	36,328	0.41%	13,48,173	8,27,982
12	Mr. Manish Jethabhai Bhaskar	77,201	0.87%	37,201	0.42%	12,97,226	8,46,228
13	Mr. Nitinkumar Lalji Bhai Bharvad	47,828	0.54%	30,328	0.34%	8,42,718	6,48,283
	Total	14,90,383	16.86%	17,44,988	19.74%	2,09,42,388	4,05,42,163
	Market total	88,40,144	100.00%	88,40,144	100.00%		

23.1. As seen from the table above, the entities contributed 16.86% to buy volume and 19.74% to sell volume in the scrip of Quasar during IP. Noticees 1 to 7, 10, 11, 14, 16, 17 and 18 squared off all the shares that were bought during IP. Noticees 8 and 9 were holding few shares of Quasar before IP and sold all their shares during IP. Noticees 12, 13 and 15 bought shares from entities holding more than 1% shares of Quasar during Patch 2 and didn't sell entirely the shares of Quasar within IP. During the IP, the entities made a profit of approx. Rs. 1.96 Crores

24. Findings with regard to Price and Volume manipulation – Patch 1 – May 01, 2022 to March 09, 2023:

24.1. I note that 9 out of 18 entities traded in the scrip of Quasar and contributed significantly to the volume in the scrip of Quasar. The trading details of 9 entities during Patch 1 are provided below:

Noticee No.	Entity name	Buy Traded Qty	%of Buy qty with mkt total	Sell Traded Qty	%of Sell qty with mkt total
4	Mr. Kuntal Jitendra Trivedi	230,200	22.00%	0	0.00%
7	Mr. Ankit Ajitbhai Panchal	107,362	10.26%	0	0.00%
3	Mr. Nayan Mahendrabhai Thakkar	86,350	8.25%	0	0.00%
9	Mr. Jagdish Chhanabhai Vaghela	85,001	8.12%	360	0.03%
5	Mr. Jigneshkumar Purshottamdas Patel	70,000	6.69%	0	0.00%

Noticee No.	Entity name	Buy Traded Qty	%of Buy qty with mkt total	Sell Traded Qty	%of Sell qty with mkt total
8	Mr. Hardik Himmatbhai Munjpara	69,423	6.63%	0	0.00%
1	M/s Chandrima Mercantiles Limited	68,074	6.50%	0	0.00%
6	Mr. Rohit Bairwa	55,346	5.29%	25	0.00%
2	Mr. Pranav Kamleshkumar Trivedi	15,000	1.43%	0	0.00%
	Total	786,756	75.18%	385	0.04%
	Market total	10,46,503	100.00%	10,46,503	100.00%

24.2. As seen from the table above, Noticees 1 to 9 bought around 75% of shares of Quasar in Patch 1 with negligible selling of shares. Thus, Noticees 1 to 9 were only buying the shares of Quasar in Patch 1.

24.3. Out of aforementioned 9 entities, Noticees 1 to 7 acquired shares of Quasar for first time in Patch 1 and Noticees 8 and 9 were holding few shares of Quasar before IP. Further, Noticee 1 and Noticees 3 to 8, by acquiring shares of Quasar, became 1% shareholders of Quasar in public category during Patch 1.

24.4. Details of LTP contribution by 9 entities as Buyers during patch 1 are provided below:

Noticee No.	Client Name	All trades			Positive LTP trades			Negative LTP trades			Zero LTP trades		
		Ltp Rate	Traded Qty	No. Of Trades	Ltp Rate	Traded Qty	No. Of Trades	Ltp Rate	Traded Qty	No. Of Trades	Traded Qty	No. Of Trades	%Ltp
8	Mr. Hardik Himmatbhai Munjpara	0.25	69423	55	0.25	2000	1	0.00	0	0	67423	54	1.24%
6	Mr. Rohit Bairwa	0.15	55346	41	0.15	1346	2	0.00	0	0	54000	39	0.75%
4	Mr. Kuntal Jitendra Trivedi	0.07	230200	65	0.90	5846	3	-0.83	40050	2	184304	60	4.47%
2	Mr. Pranav Kamleshkumar Trivedi	0.00	15000	1	0.00	0	0	0.00	0	0	15000	1	0.00%
5	Mr. Jigneshkumar Purshottamdas Patel	0.00	70000	16	0.00	0	0	0.00	0	0	70000	16	0.00%
1	M/s Chandrima Mercantiles Limited	-0.06	68074	23	0.00	0	0	-0.06	1000	1	67074	22	0.00%
9	Mr. Jagdish Chhanabhai Vaghela	-0.10	85001	25	0.00	0	0	-0.10	1	1	85000	24	0.00%

Noticee		All trades			Positive LTP trades			Negative LTP trades			Zero LTP trades		
No.	Client Name	Ltp Rate	Traded Qty	No. Of Trades	Ltp Rate	Traded Qty	No. Of Trades	Ltp Rate	Traded Qty	No. Of Trades	Traded Qty	No. Of Trades	%Ltp
3	Mr. Nayan Mahendrabhai Thakkar	-0.30	86350	80	0.96	2100	2	-1.26	13420	3	70830	75	4.77%
7	Mr. Ankit Ajitbhai Panchal	-1.55	107362	50	0.11	4330	2	-1.66	5842	5	97190	43	0.55%
	Total	-1.54	786756	356	2.37	15622	10	-3.91	60313	12	710821	334	11.77%
	Market total	-0.59	1046503	862	20.13	36197	69	-20.72	68589	74	941717	719	100.00%

24.5. As seen from the table above, 9 entities, i.e. Noticees 1 to 9 made positive LTP contribution of ₹2.37 (11.77%) by acquiring the shares of Quasar.

24.6. Volume Analysis – The scrip of Quasar had traded for only 73 days in Patch 1 as shown in below table along with the close price and volume in the scrip of Quasar for these 73 days.

Date	Close Price (Rs.)	No. of Shares traded		Date	Close Price (Rs.)	No. of Shares traded
02-May-22	9.8	5000		01-Aug-22	8.62	300
16-May-22	9.8	5190		03-Aug-22	8.19	10
19-May-22	9.4	50,000		12-Aug-22	7.79	30
26-May-22	9	50,000		16-Aug-22	7.41	1,210
30-May-22	8.8	40,000		19-Aug-22	7.05	1
31-May-22	8.45	500		25-Aug-22	6.7	39
01-Jun-22	8.15	100		30-Aug-22	6.7	400
02-Jun-22	7.85	35,020		01-Sep-22	6.45	35,377
09-Jun-22	7.55	25,001		02-Sep-22	6.42	314
15-Jun-22	7.55	221		05-Sep-22	6.44	95,790
20-Jun-22	7.2	69,424		06-Sep-22	6.76	25,007
21-Jun-22	7.35	1		08-Sep-22	7.09	40
22-Jun-22	7	30,001		09-Sep-22	7.44	60
23-Jun-22	7	110		13-Sep-22	7.81	196
27-Jun-22	6.9	1,50,002		14-Sep-22	8.2	256
28-Jun-22	7	50,113		15-Sep-22	8.61	10
29-Jun-22	6.66	4943		16-Sep-22	9.04	33
30-Jun-22	6.34	208		19-Sep-22	9.49	711
01-Jul-22	6.03	180		20-Sep-22	9.96	9,911
05-Jul-22	5.75	1		21-Sep-22	10.45	120
06-Jul-22	6	1,00,090		22-Sep-22	10.86	1,983
07-Jul-22	6.3	75		23-Sep-22	11.4	2
08-Jul-22	6.61	250		26-Sep-22	11.95	100
11-Jul-22	6.94	37		21-Nov-22	12.54	7,000

Date	Close Price (Rs.)	No. of Shares traded		Date	Close Price (Rs.)	No. of Shares traded
13-Jul-22	7.28	1		05-Dec-22	11.92	2,000
14-Jul-22	7.64	81		16-Jan-23	11.33	906
15-Jul-22	8.02	916		30-Jan-23	11.33	1,050
18-Jul-22	8.42	150		06-Feb-23	10.77	1,800
19-Jul-22	8.84	62,040		13-Feb-23	10.24	20,065
20-Jul-22	8.4	50,609		14-Feb-23	9.73	100
21-Jul-22	8.82	307		15-Feb-23	9.73	176
22-Jul-22	9.26	4,698		17-Feb-23	9.25	5
25-Jul-22	9.61	97		23-Feb-23	9.25	5
26-Jul-22	9.13	1,02,158		24-Feb-23	9.25	300
29-Jul-22	8.68	2,572		27-Feb-23	9.25	20
				01-Mar-23	8.79	10
				02-Mar-23	8.79	60
				06-Mar-23	8.65	1,010

24.7. From the table above, I note that the scrip of Quasar was very thinly traded with trading conducted only on 73 days within a span of around 10 months of Patch 1. Out of these 73 trading days in Patch 1, the scrip of Quasar was having high volumes only on 16 days.

24.8. I note that 9 entities, i.e. Noticees 1 to 9 were the major contributors to these 16 high volume days in scrip of Quasar. Following table shows the trades of entities vis-à-vis volume in the scrip of Quasar for these 16 high volume days.

S. No	Date	Total Quantity traded by entity	Buy/Sell	Total market volume	% entities volume/Total volume
Patch 1					
1	19-May-2022	50,000	Buy	50,000	100%
2	26-May-2022	20,000	Buy	50,000	40%
3	30-May-2022	34,000	Buy	40,000	85%
4	02-Jun-2022	10,000	Buy	35,020	29%
5	09-Jun-2022	10,000	Buy	25,001	40%
6	20-Jun-2022	69,423	Buy	69,424	100%
7	22-Jun-2022	5,000	Buy	30,001	17%
8	27-Jun-2022	1,35,001	Buy	1,50,002	90%
9	28-Jun-2022	50,000	Buy	50,113	100%
10	06-Jul-2022	60,000	Buy	1,00,090	60%
11	19-Jul-2022	45,000	Buy	62,040	73%

S. No	Date	Total Quantity traded by entity	Buy/Sell	Total market volume	% entities volume/Total volume
12	20-Jul-2022	40,000	Buy	50,609	79%
13	26-Jul-2022	1,00,000	Buy	1,02,158	98%
14	01-Sep-2022	35,346	Buy	35,377	100%
15	05-Sep-2022	95,680	Buy	95,790	100%
16	06-Sep-2022	22,724	Buy	25,007	91%

24.9. Thus, from the table above, I note that the 16 high volume days in the scrip of Quasar in Patch 1 were due to the buying trades of Noticees 1 to 9. In Patch 1, Noticees 1 to 9 altogether generated around 75% volume in scrip of the Quasar as compared to the total market volume in the scrip of Quasar.

25. Findings with regard to Price and Volume manipulation – Patch 2 – March 10, 2023 to May 11, 2023

25.1. During Patch 2, all the 18 entities, i.e. Noticees 1 to 18 had traded in the scrip of Quasar. The share price of Quasar rose significantly in Patch 2. Price of the scrip opened at Rs.8.65 on 10/03/2023, reached a high of Rs.42.36 on 11/05/2023, reached a low of Rs.8.65 on 10/03/2023 and closed at Rs.38.45 on 11/05/2023. Following table shows the trading of the 18 entities during Patch 2.

Noticee No.	Entities	Buy Traded Qty	%Buy	Sell Traded Qty	%Sell
1	M/s Chandrima Mercantiles Limited	96,774	3.46%	52,847	1.89%
11	Mr. Parth Rajanikant Pandya	81,328	2.91%	36,328	1.30%
15	Ms. Narmadaben Pravinbhai Parmar	81,328	2.91%	36,328	1.30%
12	Mr. Manish Jethabhai Bhaskar	77,201	2.76%	37,201	1.33%
16	Mr. Pravinbhai Lakhabhai Parmar	76,328	2.73%	36,328	1.30%
18	Mr. Sagarkumar Pravinchandra Dataniya	48,748	1.74%	24,658	0.88%
13	Mr. Nitinkumar Lalji Bhai Bhavvad	47,828	1.71%	30,328	1.08%
14	Mr. Babubhai Bhikhaji Godha	30,431	1.09%	28,130	1.01%
17	Ms. Shvetalben Sagarbhai Dataniya	28,146	1.01%	23,279	0.83%
10	Ms. Usha Devi	22,557	0.81%	6,198	0.22%
5	Mr. Jigneshkumar Purshottamdas Patel	13,967	0.50%	7,029	0.25%
6	Mr. Rohit Bairwa	9,350	0.33%	3,243	0.12%
3	Mr. Nayan Mahendrabhai Thakkar	6,548	0.23%	53,381	1.91%
7	Mr. Ankit Ajitbhai Panchal	1,993	0.07%	27,400	0.98%
8	Mr. Hardik Himmatbhai Munjpara	1,000	0.04%	52,400	1.87%

Noticee No.	Entities	Buy Traded Qty	%Buy	Sell Traded Qty	%Sell
2	Mr. Pranav Kamleshkumar Trivedi	545	0.02%	14,545	0.52%
9	Mr. Jagdish Chhanabhai Vaghela	414	0.01%	1,83,280	6.55%
4	Mr. Kuntal Jitendra Trivedi	-	0.00%	2,75,200	9.84%
	Total	6,24,486	22.32%	9,28,103	33.18%
	Market total	27,97,263	100.00%	27,97,263	100.00%

25.2. From the above table, I note that out of 18 entities, 17 entities (Noticees 1 to 3 and Noticees 5 to 18) bought and sold shares of Quasar while 1 entity (Noticee 4) only sold the shares of Quasar. The 17 entities contributed 22.32% to buy volume and 18 entities contributed 33.18% to sell volume and together all of them contributed 11.94% to market volume by trading among themselves.

25.3. Details of LTP contribution by the entities during Patch 2 in the scrip of Quasar are provided below:

Noticee No.	Entity	All trades			Positive LTP trades			Negative LTP trades			Zero LTP trades		%LTP
		LTP Rate	Traded Qty	No. Of Trades	LTP Rate	Traded Qty	No. Of Trades	LTP Rate	Traded Qty	No. Of Trades	Traded Qty	No. Of Trades	
5	Mr. Jigneshkumar Purshottamdas Patel	2.00	13,967	72	2.22	2375	10	-0.22	3704	8	7888	54	1.50%
6	Mr. Rohit Bairwa	1.05	9350	15	1.09	4063	10	-0.04	537	2	4750	3	0.73%
12	Mr. Manish Jethabhai Bhaskar	0.51	77,201	117	0.51	24,483	15	0.00	0	0	52,718	102	0.34%
13	Mr. Nitinkumar Lalji Bhai Bharvad	0.49	47,828	179	0.53	17,910	14	-0.04	1950	2	27,968	163	0.36%
9	Mr. Jagdish Chhanabhai Vaghela	0.48	414	12	0.55	85	3	-0.07	200	3	129	6	0.37%
7	Mr. Ankit Ajitbhai Panchal	0.41	1993	66	0.42	58	3	-0.01	14	1	1921	62	0.28%
15	Ms. Narmadaben Pravinbhai Parmar	0.34	81,328	108	0.55	17,002	7	-0.21	7200	7	57126	94	0.37%
1	M/s Chandrima Mercantiles Limited	0.19	96,774	1336	6.31	12,790	37	-6.12	30,845	103	53,139	1196	4.25%
14	Mr. Babubhai Bhikhaji Godha	0.11	30,431	43	0.90	1	1	-0.79	2279	15	28,151	27	0.61%
2	Mr. Pranav Kamleshkumar Trivedi	0.00	545	1	0.00	0	0	0.00	0	0	545	1	0.00%
8	Mr. Hardik Himmatbhai Munjpara	0.00	1000	2	0.00	0	0	0.00	0	0	1000	2	0.00%

Notice No.	Entity	All trades			Positive LTP trades			Negative LTP trades			Zero LTP trades		%LTP
		LTP Rate	Traded Qty	No. Of Trades	LTP Rate	Traded Qty	No. Of Trades	LTP Rate	Traded Qty	No. Of Trades	Traded Qty	No. Of Trades	
16	Mr. Pravinbhai Lakhabhai Parmar	-0.13	76,328	172	0.98	17,302	7	-1.11	5850	8	53,176	157	0.66%
10	Ms. Usha Devi	-0.37	22,557	50	0.45	25	1	-0.82	7290	26	15,242	23	0.30%
18	Mr. Sagarkumar Pravinchandra Dataniya	-0.77	48,748	49	0.06	1000	5	-0.83	10,568	18	37,180	26	0.04%
11	Mr. Parth Rajanikant Pandya	-0.80	81,328	144	0.41	16,902	12	-1.21	7950	8	56,476	124	0.28%
3	Mr. Nayan Mahendrabhai Thakkar	-0.98	6548	55	0.02	20	2	-1.00	3136	7	3392	46	0.01%
17	Ms. Shvetalben Sagarbhai Dataniya	-2.02	28,146	497	0.21	502	3	-2.23	9965	31	17,679	463	0.14%
	Total	0.51	6,24,486	2918	15.21	1,14,518	130	-14.70	91488	239	418480	2549	10.25%
	Market total	30.41	27,97,263	6640	148.32	2,78,805	765	- 117.91	4,78,952	850	20,39,506	5025	100.00%

25.4. I note from analyzing these details that the entities contributed Rs.0.51 to net LTP and Rs.15.21 to positive LTP in 130 positive LTP trades. Counterparties to the positive LTP trades were analyzed and I note that in 78 positive LTP trades, the entities traded among themselves and contributed 2.51% to market positive LTP. In remaining 52 positive LTP trades, the entities traded with normal investors and contributed Rs.11.48 to positive LTP.

25.5. Volume Analysis - In Patch 2, 9 entities (Noticees 1 to 9) of Patch 1 initially started trading among themselves and subsequently the other 9 entities (namely, Ms. Narmadaben Pravinbhai Parmar, Mr. Pravinbhai Lakhabhai Parmar, Mr. Nitinkumar Lalji Bhai Bharvad, Ms. Usha Devi, Ms. Shvetalben Sagarbhai Dataniya, Mr. Parth Rajanikant Pandya, Mr. Manish Jethabhai Bhaskar, Mr. Sagarkumar Pravinchandra Dataniya and Mr. Babubhai Bhikhaji Godha) (Noticees 10 to 18) who were not holding any shares of Quasar in Patch 1, started trading in Patch 2.

25.6. During Patch 2, the scrip of Quasar traded for 40 days. The price and volume in scrip of Quasar for these 40 trading days of Patch 2 are provided in the table below:

Date	Close Price (Rs.)	No. of Shares traded	Date	Close Price (Rs.)	No. of Shares traded
10-Mar-23	8.65	5	12-Apr-23	20.49	375
13-Mar-23	8.65	500	13-Apr-23	21.51	638
14-Mar-23	9.08	4,781	17-Apr-23	22.4	2,22,503
15-Mar-23	9.53	12,575	18-Apr-23	23.51	97,780
16-Mar-23	10	5,750	19-Apr-23	24.68	14,250
17-Mar-23	10.5	443	20-Apr-23	25.91	3,223
20-Mar-23	11.02	1,61,719	21-Apr-23	27.17	79,029
21-Mar-23	11.57	5,196	24-Apr-23	28.52	18,874
22-Mar-23	12.14	5,101	25-Apr-23	29.8	1,15,164
23-Mar-23	12.74	11,743	26-Apr-23	29.93	1,05,328
24-Mar-23	13.37	76,619	27-Apr-23	29.43	1,08,483
27-Mar-23	14.03	30,554	28-Apr-23	30.23	59,296
28-Mar-23	14.73	3,395	02-May-23	30.91	38,729
29-Mar-23	15.46	58,339	03-May-23	32.02	13,335
31-Mar-23	16.23	210	04-May-23	33.2	37,616
03-Apr-23	17.04	1,532	05-May-23	34.86	6,607
05-Apr-23	17.52	5,44,704	08-May-23	36.6	2,050
06-Apr-23	18.07	2,09,495	09-May-23	38.43	3,096
10-Apr-23	18.72	53,849	10-May-23	40.35	1,07,401
11-Apr-23	19.52	3,45,374	11-May-23	38.45	2,31,602

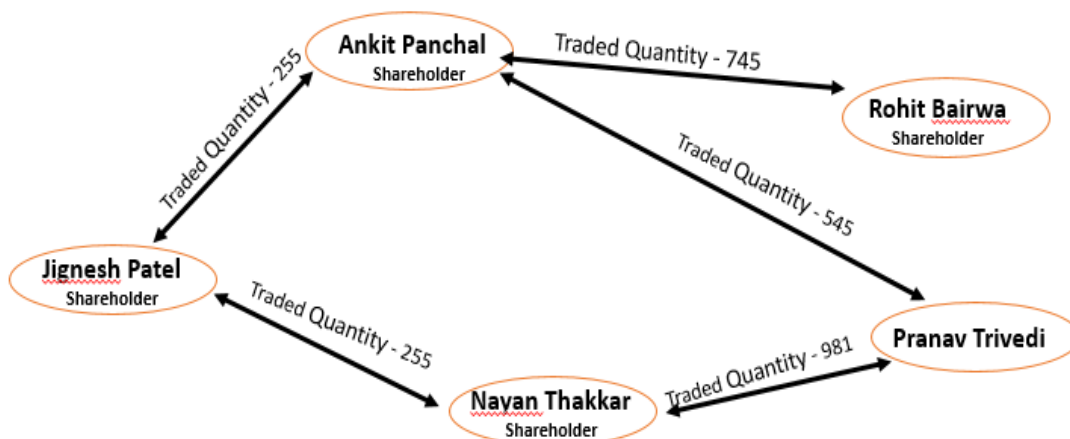
25.7. From the above table, I note that out of the 40 trading days in Patch 2, there were 31 trading days where high trading of shares/volume was observed. Investigation revealed that out of the 40 trading days in Patch 2, the 18 entities (Noticees 1 to 18) had significantly traded amongst themselves (including the circular trading) on 12 trading days as well as trading on buy or sell side on 11 unique trading days.

25.8. The table, along with few illustrations, showing the trades of entities among themselves on 12 trading days vis-à-vis volume in the scrip of Quasar for these 12 trading days:

S. NO.	Trade date	Sum of traded quantity among entities	Total market volume	% to Total market volume
1	14-Mar-2023	2781	4781	58.17%
2	16-Mar-2023	3750	5750	65.22%
3	20-Mar-2023	1,57,500	1,61,719	97.39%
4	10-Apr-2023	40,000	53,849	74.28%
5	11-Apr-2023	48,303	3,45,374	13.99%

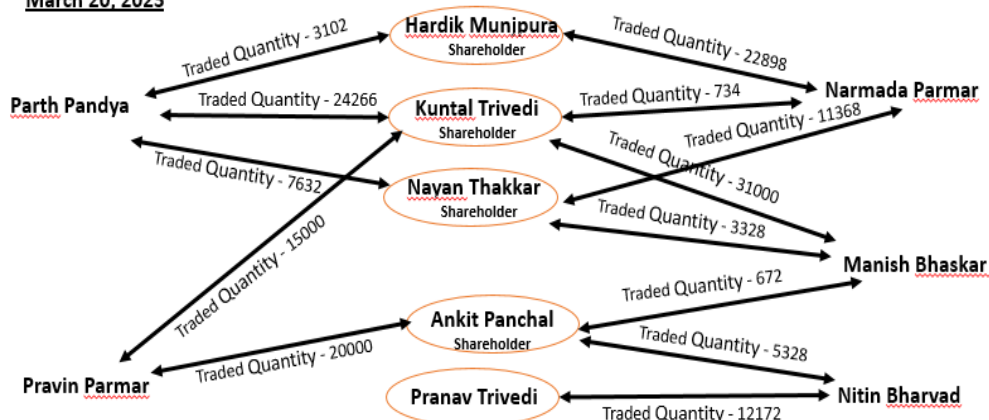
S. NO.	Trade date	Sum of traded quantity among entities	Total market volume	% to Total market volume
6	18-Apr-2023	23,340	97,780	23.87%
7	21-Apr-2023	26,668	79,029	33.74%
8	26-Apr-2023	4000	105,328	3.80%
9	27-Apr-2023	19,986	10,8483	18.42%
10	02-May-2023	300	38,729	0.77%
11	04-May-2023	5287	37,616	14.06%
12	11-May-2023	1951	231,602	0.84%

March 14, 2023



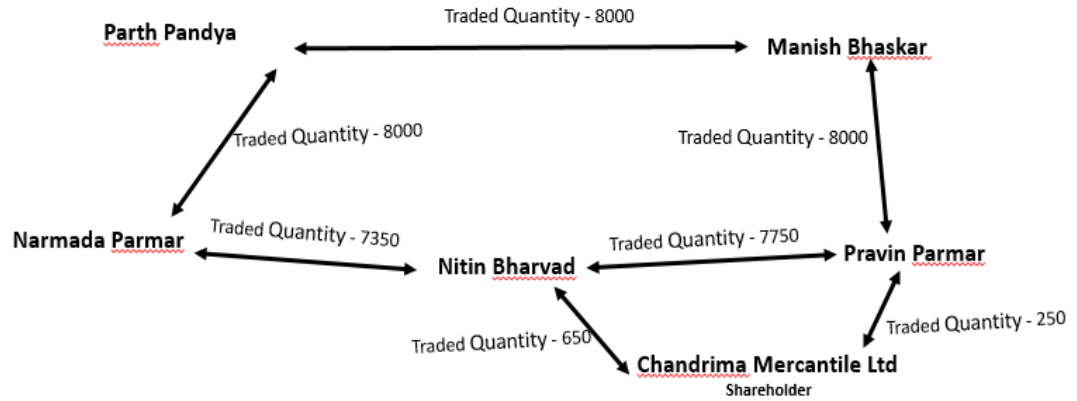
Total Traded Quantity - 2781

March 20, 2023



Total Traded Quantity – 1,57,500

April 10, 2023



Total Traded Quantity – 40,000

25.9. Further, following table shows the trading of the entities in scrip of Quasar on buy side or on sell side on 11 trading day's vis-à-vis total volume in the scrip of Quasar on these 11 days:

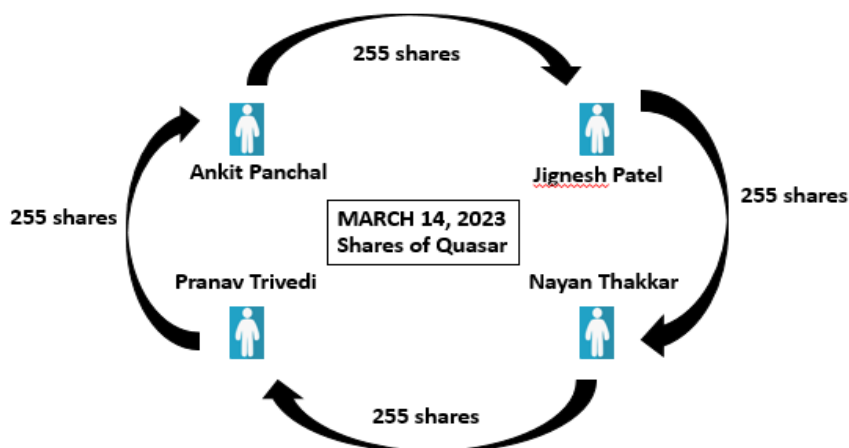
S. No.	Date	Total Quantity by entites	Buy/Sell	Total market volume	% quantity by suspects/ market volume
1	24-Mar-2023	30,000	Buy	76,619	39%
2	05-Apr-2023	42,159	Buy	5,44,704	12%
	05-Apr-2023	25,676	Sell		
3	06-Apr-2023	20,158	Buy	2,09,495	19%
	06-Apr-2023	20,158	Sell		
4	11-Apr-2023	62,503	Buy	3,45,374	100%
	11-Apr-2023	3,11,803	Sell		
5	17-Apr-2023	3,267	Buy	2,22,503	91%
	17-Apr-2023	2,00,070	Sell		
6	18-Apr-2023	39,175	Sell	97,780	40%
7	21-Apr-2023	36,638	Buy	79,029	92%
	21-Apr-2023	35,835	Sell		
8	26-Apr-2023	22,859	Buy	1,05,328	26%
	26-Apr-2023	4,000	Sell		
9	27-Apr-2023	55,069	Buy	1,08,483	77%
	27-Apr-2023	28,670	Sell		
10	04-May-2023	9,973	Buy	37,616	54%
	04-May-2023	10,259	Sell		
11	11-May-2023	49,829	buy	2,31,602	22%

S. No.	Date	Total Quantity by entites	Buy/Sell	Total market volume	% quantity by suspects/ market volume
	11-May-2023	2,003	Sell		

25.10. Thus, all the 18 entities together by trading amongst themselves and either on buy or sell side, were generating and contributing volume of around 55% in the scrip of Quasar to the total market volume and subsequently were influencing the rise in price of shares of Quasar in Patch 2.

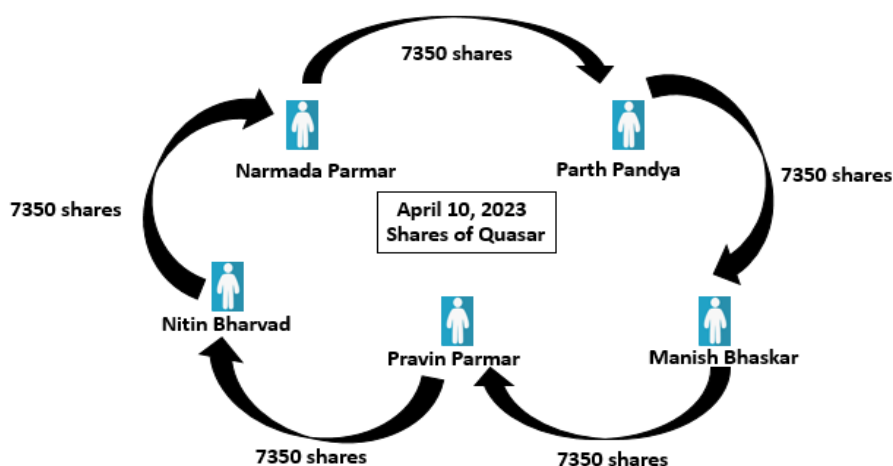
25.11. Circular Trades by Entities - Following table & illustrations show circular trading done by the 9 entities in Patch 2:

March 14, 2023			
Buyer Name	Seller Name	% Day Volume	Circular Trade Volume
Mr. Pranav Kamleshkumar Trivedi	Mr. Ankit Ajitbhai Panchal	5.333612	255
Mr. Ankit Ajitbhai Panchal	Mr. Jigneshkumar Purshottamdas Patel	5.333612	255
Mr. Jigneshkumar Purshottamdas Patel	Mr. Nayan Mahendrabhai Thakkar	5.333612	255
Mr. Nayan Mahendrabhai Thakkar	Mr. Pranav Kamleshkumar Trivedi	5.333612	255
Total Circular Trade Volume			1,020
Total Market Volume			4,781
% of circular trade volume to total market volume			21.33

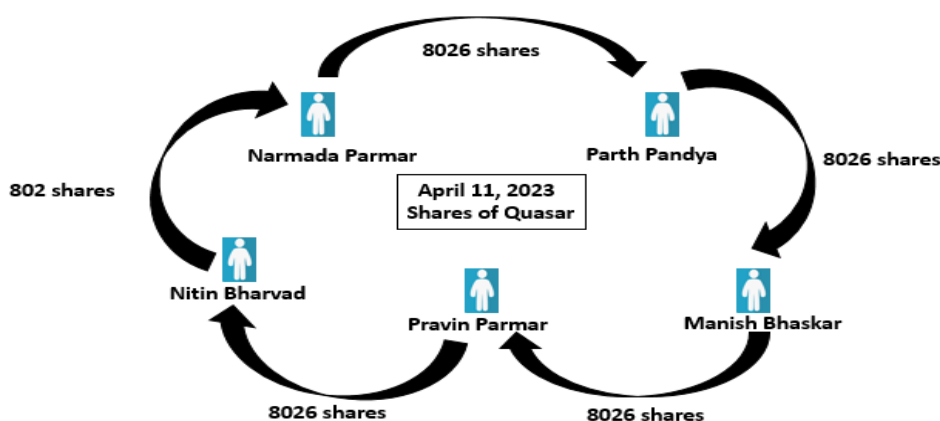


April 10, 2024			
Buyer Name	Seller Name	% Day Volume	Circular Trade Volume
Ms. Narmadaben Pravinbhai Parmar	Mr. Parth Rajanikant Pandya	13.64928	7,350
Mr. Parth Rajanikant Pandya	Mr. Manish Jethabhai Bhaskar	13.64928	7,350
Mr. Manish Jethabhai Bhaskar	Mr. Pravinbhai Lakhabhai Parmar	13.64928	7,350

Mr. Pravinbhai Lakhabhai Parmar	Mr. Nitinkumar Lalji Bhai Bharvad	13.64928	7,350
Mr. Nitinkumar Lalji Bhai Bharvad	Ms. Narmadaben Pravinbhai Parmar	13.64928	7,350
Total Circular Trade Volume			36,750
Total Market Volume			53,849
% of circular trade volume to total market volume			68.24



April 11, 2024			
Buyer Name	Seller Name	% Day Volume	Circular Trade Volume
Ms. Narmadaben Pravinbhai Parmar	Mr. Parth Rajanikant Pandya	2.323858	8,026
Mr. Parth Rajanikant Pandya	Mr. Manish Jethabhai Bhaskar	2.323858	8,026
Mr. Manish Jethabhai Bhaskar	Mr. Pravinbhai Lakhabhai Parmar	2.323858	8,026
Mr. Pravinbhai Lakhabhai Parmar	Mr. Nitinkumar Lalji Bhai Bharvad	2.323858	8,026
Mr. Nitinkumar Lalji Bhai Bharvad	Ms. Narmadaben Pravinbhai Parmar	2.323858	8,026
Total Circular Trade Volume			40,130
Total Market Volume			3,45,374
% of circular trade volume to total market volume			11.61



25.12. I note from the tables above, that 9 out of 18 entities indulged in circular trading on March 14, 2023, April 10, 2023, & April 11, 2023 and contributed 21%, 68%, 11% volume respectively to total market volume in the scrip of Quasar on these three days. This volume generated by entities through circular trading is significant for these 3 days and these pattern of circular trades by aforesaid 9 entities indicates their meeting of minds and their intention to trade exclusively by entering into trades without intending to change the ownership of the shares and provide a false appearance of trading in scrip in order to cause variation in the price of share. Thus, I note that entities fraudulently created artificial volume in the scrip of Quasar.

26. Findings with regard to Price and Volume manipulation – Patch 3 – May 12, 2023 to December 31, 2023

26.1. The price of the scrip of Quasar opened at high price of Rs.36.53 on 12/05/2023, reached a low of Rs.16.89 on 13/12/2023 and closed at Rs.19.2 on 29/12/2023. Following table shows the trading of the entities during Patch 3:

Noticee No.	Entities	Buy Traded Qty	%Buy	Sell Traded Qty	%Sell
1	M/s Chandrima Mercantiles Limited	50,336	1.01%	1,62,337	3.25%
18	Mr. Sagarkumar Pravinchandra Dataniya	25,763	0.52%	49,853	1.00%
6	Mr. Rohit Bairwa	1,765	0.04%	61,524	1.23%
10	Ms. Usha Devi	1,247	0.02%	17,588	0.35%
14	Mr. Babubhai Bhikhaji Godha	30	0.00%	2,301	0.05%

2	Mr. Pranav Kamleshkumar Trivedi	-	0.00%	1,000	0.02%
5	Mr. Jigneshkumar Purshottamdas Patel	-	0.00%	76,938	1.54%
17	Ms. Shvetalben Sagarbhai Dataniya	-	0.00%	4,867	0.10%
9	Mr. Jagdish Chhanabhai Vaghela	-	0.00%	65,597	1.31%
8	Mr. Hardik Himmatbhai Munjpara	-	0.00%	1,68,023	3.36%
3	Mr. Nayan Mahendrabhai Thakkar	-	0.00%	39,517	0.79%
11	Mr. Parth Rajanikant Pandya	-	0.00%	45,000	0.90%
16	Mr. Pravinbhai Lakhabhai Parmar	-	0.00%	40,000	0.80%
7	Mr. Ankit Ajitbhai Panchal	-	0.00%	81,955	1.64%
	Total	79,141	1.58%	8,16,500	16.34%
	Market total	49,96,378	100.00%	49,96,378	100.00%

- 26.2. From the table above, I note that 14 entities contributed 1.58% to buy volume and 16.34% to sell volume in Patch 3. Out of the 14 entities, 5 entities traded as buyer and seller and 9 entities traded as seller.
- 26.3. In Patch 3, the scrip of Quasar was being regularly traded with shares being traded for 136 trading days unlike in Patch 1 where the scrip was thinly traded with only 73 trading days.
- 26.4. Further, I note that 14 entities sold their shares of Quasar to normal investors and also contributed significant volume on 11 days in Patch 3. Following table shows the trades of 14 entities vis-à-vis volume in scrip of Quasar for 11 days in Patch 3:

S. No.	Date	Total Quantity traded by entity	Buy/ Sell	Total market volume	% volume/Total volume
1	12-06-2023	43,385	Sell	76,189	57%
2	13-06-2023	3,932	Sell	11,082	35%
3	26-06-2023	1,63,022	Sell	3,35,018	49%
4	03-07-2023	29,418	Sell	29,420	100%
5	26-07-2023	35,897	Sell	38,940	92%
6	28-07-2023	4,000	Sell	11,234	36%
7	20-11-2023	2,54,413	Sell	4,19,062	61%
8	21-11-2023	1,01,171 Sell, 1266 Buy	Buy & Sell	5,08,399	20%
9	22-11-2023	76,910 Sell, 22,076 Buy	Buy & Sell	5,77,116	17%
10	23-11-2023	41,756	Sell	5,68,507	7%
11	15-12-2023	85,325	Sell	2,50,859	34%

26.5. From the table above, I note that the 14 entities majorly sold their shares of Quasar which were acquired in Patch 1 and Patch 2. During Patch 3, these entities traded for only 11 days out of 136 trading days.

27. Observations on overall price & volume analysis of Patch 1, 2 & 3

27.1. In Patch 1, the scrip of Quasar was traded for only 73 trading days within the span of 10 months with only 16 trading days observing high volumes. During this Patch, 9 entities majorly bought the shares of Quasar and 8 of them became 1% shareholders of Quasar in public category. These 9 entities altogether generated around 75% volume to the total market volume in the scrip of Quasar for all the 16 high volume trading days of Quasar in Patch 1. Thus, these 9 entities were the main entities generating the volume in the scrip of Quasar in Patch 1.

27.2. In Patch 2, the scrip of Quasar traded for 40 trading days wherein 31 trading days observed high volumes and there was a substantial price rise observed. During this Patch, 9 entities of Patch 1, initially began trading among themselves and then subsequently were joined by remaining 9 entities for trading in the scrip of Quasar. Together, the 18 entities traded amongst themselves and either on buy/sell side and artificially contributed to the high volume in the scrip of Quasar for 23 trading days out of total 31 high volume trading days. The high volume generation also resulted in rise in the price of the scrip of Quasar which was misleading and attracted the normal investors to trade in scrip of Quasar. The same can be ascertained from the complaints received from investors pertaining to buying recommendations for scrip of Quasar, being circulated in social media platforms. Further, 9 out of 18 entities also indulged in the circular trades and contributed to the volume in the scrip of Quasar. Therefore, the sole intention of the 18 entities was to create artificial volume and influence the price of the scrip of Quasar and mislead the normal gullible investors to trade in the scrip of Quasar.

27.3. Due to the increased volume and price in Patch 2, the retail investors started trading in the scrip of Quasar which is evident from the 265% increase (from 2,367 to 6,214) in number of public shareholders in Quasar by the end of Dec, 2023. Once these retail investors started trading of Quasar, 15 out of 18 entities sold all their shares of Quasar and remaining 3 entities were left with few shares of Quasar. Thus, overall, 18 entities were successful in executing their modus operandi of manipulating the scrip of Quasar and made profit by exiting the scrip.

28. Analysis of Bank Account Statements of entities - The bank account statements of the Noticees were analysed for fund flow. Pursuant to analysis, following was observed:

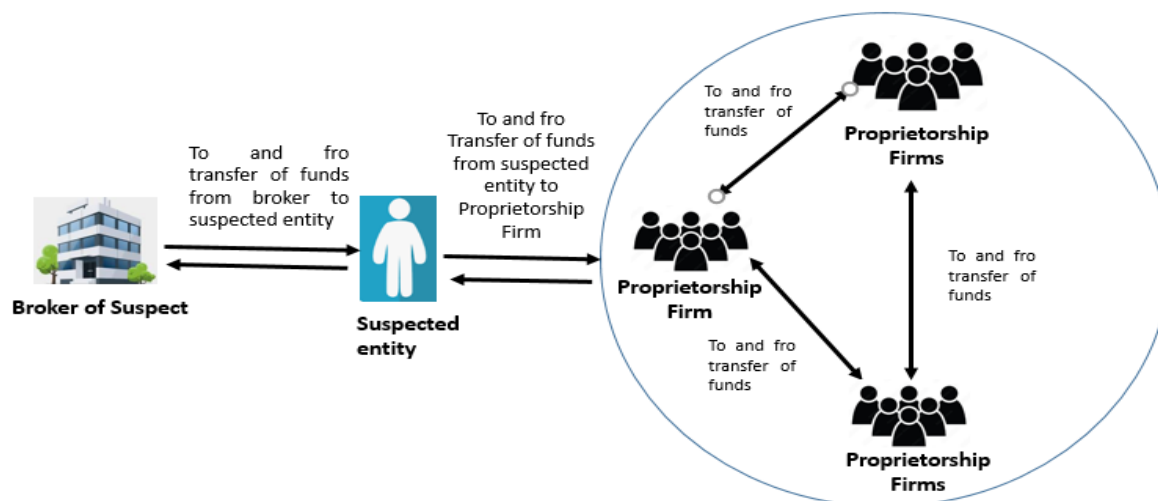
28.1. Direct bank funds transfer between entities - The entities had transferred funds amongst themselves directly, as can be seen from the table below, and thus, they were connected to each other.

Name of Transferor	Noticee No.	Amount (Rs.)	Date	Name of Receiver	Noticee No.
Mr. Kuntal Jitendra Trivedi	4	73,000	16/12/2022	Ms. Shvetalben Sagarbhai Dataniya	17
Mr. Jigneshkumar Purshottamdas Patel	5	15,000	10/08/2022	Ms. Usha Devi	10
Mr. Nayan Mahendrabhai Thakkar	3	60,000	26/04/2022	Mr. Pranav Kamleshkumar Trivedi	2
Mr. Kuntal Jitendra Trivedi	4	12,02,000	23/03/2022	Mr. Ankit Ajitbhai Panchal	7
Mr. Kuntal Jitendra Trivedi	4	12,30,000	23/03/2022	Mr. Hardik Himmatbhai Munjpara	8
Mr. Nayan Mahendrabhai Thakkar	3	10,00,000	05/01/2022	Mr. Hardik Himmatbhai Munjpara	8
Mr. Kuntal Jitendra Trivedi	4	8,30,000	15/12/2022	Ms. Usha Devi	10

28.2. Bank funds transfer between entities through a proprietorship firm for trading in scrip of Quasar:

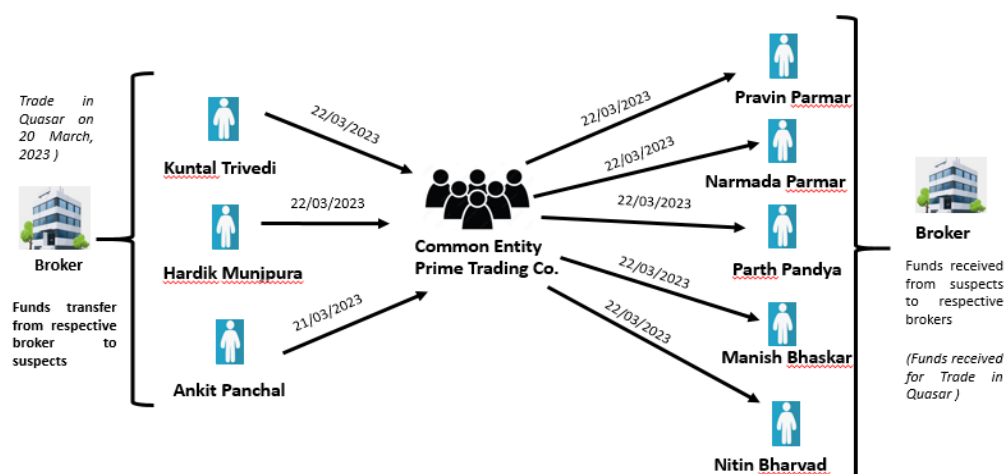
28.2.1. The entities had also indirectly transferred funds among themselves in multiple layers with the help of proprietorship firms. These fund transfers

were mainly intended for trading in scrip of Quasar. The pictorial illustration to explain such funds transfer is provided below:



28.2.2. As illustrated above, fund transactions took place in two ways i.e. firstly, either the entities received pay-in from its broker in their bank account and transferred the funds to the proprietorship firms; or secondly, these entities received funds in their bank accounts from proprietorship firms and made pay-out to their broker for the purpose of trading in the scrip of Quasar

28.2.3. The following illustration shows transfer of funds among 8 entities through a proprietorship firm (M/s Prime Trading Co.) for trading in the scrip of Quasar:



Date of trading in Quasar by entity	Entity name	Pay in received from broker (Rs.)	Pay in Amount transferred by entities to M/s Prime Trading Co. (Rs.)	Date of transfer of funds from M/s Prime Trading Co. to entities	Name of entities who received funds from M/s Prime Trading Co.	Amount transferred (Rs.)	Date of trading in Quasar by entities
March 20, 2023	Mr. Kuntal Trivedi (Noticee 4)	7,78,060	7,75,000	March 21, 2023	Mr. Parth Rajanikant Pandya (Noticee 11)	6,25,500	March 24, 2023
	Mr. Hardik Munjpara (Noticee 8)	15,00,000	15,00,100	March 22, 2023	Mr. Pravinbhai Lakhabhai Parmar (Noticee 16)	6,00,000	
					Mr. Manish Jethabhai Bhaskar (Noticee 12)	6,00,000	
	Mr. Ankit Panchal (Noticee 7)	3,00,000	2,99,900	March 22, 2023	Ms. Narmadaben Pravinbhai Parmar (Noticee 15)	6,00,000	
					Mr. Nitinkumar Lalji Bhai Bhavvad (Noticee 13)	4,00,100	

28.2.4. From the above illustration and table, I note that three entities traded in scrip of Quasar and received pay-in from their respective brokers to their bank account. Thereafter, they transferred these funds to a proprietorship firm viz. M/s Prime Trading Co. which in turn transferred these funds to other 5 entities who made a pay out to their respective brokers which was subsequently used to trade in the scrip of Quasar.

28.2.5. Bank funds transfer between the entities and the proprietorship firms for trading in the scrip of Quasar: I note that fund pertaining to pay-in and pay-out were transferred / received by entities for their trades placed in scrip of Quasar. The details of fund transfers are provided in the table below:

S. No.	Name of the entity	Amount received from /transferred to proprietorship firm (Rs.)	Name of proprietorship firm	Date of receipt/transfer (proprietorship firm)	Amount received from /transferred to broker (Rs.)	Date of receipt/transfer (broker)	Date of trading in Quasar	Amount of trading (Rs.)
1	Mr. Ankit Ajitbhai Panchal (Noticee 7)	25,00,000 (Received)	M/s Parash Enterprise	25/05/2022	25,00,001 (transferred)	25/05/2022	30/05/2022	2,98,603
		2,99,900 (transferred)	M/s Prime Trading	22/03/2023	3,00,000 (received)	20/03/2023	20/03/2023	2,86,520
		24,80,818	M/s Vinit Enterprise	22/11/2023	24,83,669 (received)	21/11/2023	20/11/2023	24,98,214
2	Mr. Hardik Himmatbhai Munjpara (Noticee 8)	15,00,100 (transferred)	M/s Prime Trading Co.	22/03/2023	15,00,000 (received)	21/03/2023	20/03/2023	2,86,520
		36,97,525 (transferred)	M/s Rajni enterprise	27/06/2023	37,00,000 (received)	27/06/2023	26/06/2023	35,13,124
3	Mr. Kuntal Trivedi (Noticee 4)	7,75,000 (transferred)	M/s Prime Trading Co.	22/03/2023	7,78,0,60 (received)	21/03/2023	20/03/2023	7,82,420
		39,22,640 (transferred)	M/s Vinit Enterprise M/s Sara Enterprise M/s Rajni Enterprise	13/04/2023	39,20,719 (received)	12/04/2023	11/04/2023	39,32,577
4	Mr. Nayan Mahendrabhai Thakkar (Noticee 3)	28,00,000 (received)	M/s Amba Enterprise	19/05/2022	28,00,100 (transferred)	19/05/2022	19/05/2022	2,35,000
		10,00,000 (received)	M/s Parash Enterprise	26/05/2022	10,00,000 (transferred)	26/05/2022	26/05/2022	1,80,000
		9,99,900 (transferred)	M/s Rajni Enterprise	08/07/2023	10,00,082 (received)	07/07/2023	03/07/2023	6,21,308
5	Mr. Jigneshkumar Purshottamdas Patel (Noticee 5)	30,00,000 (received)	M/s Parash Enterprise	21/06/2022	29,99,001 (transferred)	21/06/2022	27/06/2022	3,79,500
		34,01,250 (transferred)	M/s Vinit Enterprise	15/06/2023	34,00,000 (received)	14/06/2023	12/06/2023	6,05,663
		15,89,550 (transferred)	M/s Kiran Enterprise	24/11/2023	15,75,983 (received)	22/11/2023	20/11/2023	15,82,095
6	Ms. Usha Devi (Noticee 10)	5,10,000 (transferred)	M/s Vasupujya Trading	21/11/2023	5,08,434 (received)	21/11/2023	20/11/2023	5,10,845
7	Mr. Babubhai Bhikhaji Godha (Noticee 14)	14,10,000 (transferred)	M/s Vishwakarma Trading	13/02/2023	14,04,500 (received)	13/02/2023	05/04/2023	5,38,990
				14/03/2023		14/03/2023	06/04/2023	
							11/04/2023	
							21/07/2023	
							27/04/2023	

S. No.	Name of the entity	Amount received from /transferred to proprietorship firm (Rs.)	Name of proprietorship firm	Date of receipt/transfer (proprietorship firm)	Amount received from /transferred to broker (Rs.)	Date of receipt/transfer (broker)	Date of trading in Quasar	Amount of trading (Rs.)
			M/s Siddheswari Corp					
		11,50,000 (received)	M/s Vinit Enterprises M/s Kiran Enterprise	17/07/2023 29/08/2023	13,80,463 (transferred)	07/04/2023 17/07/2023	12/06/2023 28/08/2023	5,67,373
8	Mr. Rohit Bairwa (Noticee 6)	7,00,000 (received)	M/s Sahjanand Trading	14/03/2023	7,01,000 (transferred)	14/03/2023	14/03/2023 15/03/2023 16/03/2023 27/04/2023 11/05/2023	2,67,173
9	Mr. Sagar Dataniya (Noticee 18)	4,75,000 (received)	M/s Vishwakarma Trading	22/2/2023	4,77,000 (transferred)	22/02/2023	15/03/2023 05/04/2023	1,82,374
10	Mr. Shvetaiben Dataniya (Noticee 17)	4,75,000 (received)	M/s Vishwakarma Trading	22/2/2023	4,76,000 (transferred)	22/02/2023	15/03/2023 05/04/2023	1,94,640
11	Mr. Parth Rajanikant Pandya (Noticee 11)	6,00,000 (received)	M/s Prime Trading	17/03/2023 20/03/2024 24/03/2024	6,00,000 (transferred)	17/03/2024 20/03/2024 24/03/2024	20/03/2024 24/03/2024	5,19,400
		8,65,000 (transferred)	M/s Aman Enterprise	25/12/2024	9,17,938 (received)	19/12/2023	15/12/2023	9,24,750
12	Mr. Manish Jethabhai Bhaskar (Noticee 12)	6,00,000 (received)	M/s Prime Trading	17/03/2023 20/03/2024 24/03/2024	6,00,000 (transferred)	17/03/2024 20/03/2024 24/03/2024	20/03/2024 24/03/2024	4,52,550
		4,72,000 (transferred)	M/s Prime Trading	28/04/2023	4,71,900 (received)	27/04/2023	18/04/2023 21/04/2023 27/04/2023	4,90,238
13	Ms. Narmadaben Pravinbhai Parmar (Noticee 15)	6,00,000 (received)	M/s Prime Trading	17/03/2023 20/03/2024 24/03/2024	6,00,000 (transferred)	17/03/2024 20/03/2024 24/03/2024	20/03/2024 24/03/2024	5,19,400
14	Mr. Pravinbhai Lakhabhai	6,00,000 (received)	M/s Prime Trading	17/03/2023 20/03/2024 24/03/2024	6,00,000 (transferred)	17/03/2024 20/03/2024 24/03/2024	20/03/2024 24/03/2024	4,52,550

S. No.	Name of the entity	Amount received from /transferred to proprietorship firm (Rs.)	Name of proprietorship firm	Date of receipt/transfer (proprietorship firm)	Amount received from /transferred to broker (Rs.)	Date of receipt/transfer (broker)	Date of trading in Quasar	Amount of trading (Rs.)
	Parmar (Noticee 16)	4,26,000 (transferred)	M/s Prime Trading	28/04/2023	4,26,569 (received)	27/04/2023	18/04/2023 21/04/2023 27/04/2023	4,88,742
15	Mr. Nitinkumar Lalji Bhai Bharvad (Noticee 13)	2,00,000 (received)	M/s Prime Trading	20/03/2024	2,00,000 (transferred)	20/03/2024	20/03/2024	1,92,850

28.2.6. From the above table, I note that proprietorship firms namely M/s Prime Trading Co., M/s Vinit Enterprises, M/s Sara Enterprises, M/s Kiran Enterprises, M/s Rajni Enterprises, M/s Vishwakarma Trading Co, M/s Sahjanand Trading Co., M/s Parash Enterprises, M/s Siddheswari Corporation etc. had either transferred funds to entities for trading in the scrip of Quasar or had received funds from entities after trading in the scrip of Quasar. Thus, these proprietorship firms were involved in funds transfer with entities for the purpose of trading in the scrip of Quasar.

29. Connection between Mr. Pranav Kamleshkumar Trivedi (Noticee 2) and M/s Chandrima Mercantiles Limited (Noticee 1): One of the entity viz. Mr. Pranav Kamleshkumar Trivedi (Noticee 2), is the director of M/s Chandrima Mercantiles Limited (Noticee 1). Both Noticees 1 and 2 had traded in the scrip of Quasar. The analysis of their bank account statements revealed that Noticee 1 had numerous banking transactions with proprietorship firms viz. M/s Vinit Enterprises, M/s Sara Enterprises, M/s Sahjanand Trading Co., M/s Vishwakarma Trading Co., M/s Rajni Enterprises etc. for trading in the scrip of Quasar along with the funds transfer with several other partnership/ proprietorship firms and companies. Further, Noticee 2 also had banking transactions in individual capacity with the proprietorship firms viz. M/s Vinit Enterprises, M/s Sara Enterprises, M/s Sahjanand Trading Co., M/s

Vishwakarma Trading Co., M/s Prime Trading Co. In fact, Noticee 2 had received funds from these proprietorship firms and the same were transferred by him to a company viz. M/s Veggie Fest Foods Pvt. Ltd. where he is the director and authorized signatory. Thus, it was inferred that Noticee 2, as a director of Noticee 1, was aware about the proprietorship firms and their funds transfer to entities for trading in the scrip of Quasar. It was also inferred that Noticee 2 was managing the operations and account of his company Noticee 1, as its director (MD&CEO).

30. Analysis of Trading of entities across the market: From the trading history of the entities across market obtained from NSE and BSE during investigation period, I note that the entities placed orders in a particular scrip on same day together and these pattern was observed on multiple days. For example, on March 14, 2023, the entities together in a cluster had traded in scrip of M/s Generic Engg. Construction & Projects Ltd. at BSE and in scrip of M/s Vertoz at NSE. Similarly, on March 15, 2023, these entities had traded in group in scrip of M/s Capri Global Capital Ltd at BSE and in scrip of M/s Medico Remedies at NSE. Thus, I note that the entities were trading in a synchronized pattern together, not only in the scrip of Quasar but in multiple scrips, which points to their modus operandi of manipulative trading.

31. Analysis of IP/MAC ID of trades of entities:

31.1. Upon analysing the IP address and MAC address with respect to trades/orders placed by 18 entities, I note that certain entities had common IP or MAC id on the dates when they had done trading in scrip of Quasar. The details are provided in the table below:

S. No.	Date	Common IP or MAC	Entities	Notice No.
1.	14/03/2023	BFEBFBFF000306C3 (MAC address)	Mr. Ankit Ajitbhai Panchal Mr. Nayan Mahendrabhai Thakkar	7 3
2.	05/04/2023 06/04/2023 10/04/2023 11/04/2023	27.61.138.121	M/s Chandrima Mercantile Ltd. Mr. Jagdish Chhanabhai Vaghela	1 9
3.	31/03/2023	117.99.48.100	Mr. Rohit Bairwa	6

S. No.	Date	Common IP or MAC	Entities	Notice No.
4.	08/03/2023	27.61.242.142	Mr. Jignesh Purshottamdas Patel	5
5.	25/04/2023	110.226.183.135	Mr. Manish Jethabhai Bhaskar Mr. Nitinkumar Laljibhai Bharvad	12 13
6.	15/03/2023 16/03/2023	27.61.146.99	Mr. Ankit Ajitbhai Panchal Ms. Usha Devi	7 10
7.	10/04/2023	172.18.2.101	Mr. Pravinbhai Lakhabhai Parmar Ms. Shvetalben Sagarbhai Dataniya	16 17
8.	05/04/2023	E0-D5-5E-02-AB-C1 (MAC Address)	Mr. Sagarkumar Pravinchandra Dataniya Ms. Shvetalben Sagarbhai Dataniya	18 17
9.	14/03/2023	27.61.239.206	Mr. Nayan Mahendrabhai Thakkar	3
10.	02/02/2023	27.61.247.42	Mr. Pranav Kamleshkumar Trivedi	2
11.	16/03/2023	27.61.228.144	M/s Chandrima Mercantile Ltd. Mr. Jagdish Chhanabhai Vaghela	1 9
12.	05/04/2023	27.61.169.242	Mr. Babubhai Bhikhaji Godha	14

31.2. From the above table, I note that few of the entities in pair, had same MAC address or same IP which can be attributed to the fact that their trades were placed from same PC/laptop or same location and thus these entities were connected to each other.

31.3. Further, upon analysis of the tower location of the IPs at S. no. 2,4,6,9,10,11,12 i.e. (27.61.138.121; 27.61.242.142; 27.61.146.99; 27.61.239.206; 27.61.247.42; 27.61.228.144; 27.61.169.242), I note that all these IPs had the same tower location of "At Titanium City- Near Sachin Tower- 100 Ft Road- Prahladnagar- Ahmedabad NA AHMEDABAD". This particular tower location matches with the office location and address of M/s Chandrima Mercantiles Limited which is 'B-712 Seven Floor Titanium City Centre, Near Sachin Tower, 100 Feet, Anandnagar Road, Ahmedabad, Gujarat – 380 015'. Thus, I find that the trades of the 9 entities, i.e. Noticees 1, 2, 3, 5, 6, 7, 9, 10 and 14, were placed from the office of Noticee 1.

32. Analysis of IPs of Internet banking login by entities:

32.1. In order to examine the internet banking login activity of the Bank Accounts of entities, login IP details were sought from their respective banks namely, IDBI Bank, Axis Bank and Karur Vysya Bank. Upon analysing the login IP details

received from the banks, I note that bank accounts of many entities were being operated from the same IP. The common IP on some dates (which includes date of trading in Quasar) are provided below.

32.2. Common internet login IP as received from IDBI Bank

S. No.	Date	Internet banking login IP	Entities	Noticee No.
1.	07/04/2023	2401:4900:54c3:86c8:80a6:3df1:dd13:e2e1	Mr. Nayan Mahendrabhai Thakkar Mr. Jigneshkumar Purshottamdas Patel Mr. Ankit Ajitbhai Panchal Mr. Hardik Himmatbhai Munjpara Mr. Jagdish Chhanabhai Vaghela Ms. Usha Devi Mr. Babubhai Bhikhaji Godha	3 5 7 8 9 10 14
2.	14/03/2023	2401:4900:3613:3112:99bc:5bf8:1d50:2a0	Mr. Kuntal Trivedi Mr. Babubhai Bhikhaji Godha	4 14
3.	07/01/2023	2401:4900:361d:348:e5bd:ab02:cb2a:4f67	Mr. Kuntal Trivedi Mr. Nayan Mahendrabhai Thakkar Mr. Jagdish Chhanabhai Vaghela	4 3 9

32.3. Common Bank Login IP as received from Axis Bank:

S. No.	Date	Internet banking login IP	Entities	Noticee No.
1.	07/04/2023	27.61.138.121	Mr. Rohit Bairwa Mr. Sagarkumar Pravinchandra Dataniya Ms. Shvetaiben Sagarbhai Dataniya	6 18 17
2.	10/04/2023	27.61.138.121	Mr. Rohit Bairwa Mr. Sagarkumar Pravinchandra Dataniya	6 18

32.4. The details of aforesaid internet banking login IPs received from IDBI Bank and Axis Bank were sought from TSPs. The TSPs provided the requisite details wherein I note that these IPs have a common mobile number '6358042132'. CAF ('Customer Application Form') of this mobile no. sought from TSP showed that the mobile number was in the name of a person viz. 'Mr. Shaikh Mohammed Asif' and the tower location of this mobile no. was "At Titanium City- Near Sachin Tower- 100 Ft Road- Prahladnagar- Ahmedabad NA AHMEDABAD". This tower location address is same as the office address of

Noticee 1. Further, the CDR of the said mobile no '6358042132' contains only SMS and not a single call has been made from this number, which shows that this mobile no. has been used only for internet purpose. As per CAF of this mobile number, I note that the said mobile number had been verified by the customer using another mobile number '8320326808'.

32.5. Subsequently, CAF was sought from TSP for his another mobile number 8320326808 mentioned in his KYC. From the CAF I note that this mobile number belonged to a person viz. Mr. Amit Laljibhai Makwana. Upon further examination, I note that the mobile number of one of the entity viz. Mr. Nayan Mahendrabhai Thakkar (as per UCC details) is also in the name of Mr. Amit Laljibhai Makwana. Therefore, from the above, I note that the bank accounts of the 11 entities were operated from the office address of M/s Chandrima Mercantiles limited.

32.6. Common Bank Login IP as received from Karur Vysya Bank - The IP details received from Karur Vysya Bank were examined and out of the several common IPs for 5 entities, few IPs corresponding with trading of these entities in scrip of Quasar are mentioned as under:

S. No.	Date	Internet banking login IP	Entities	Noticee No.
1.	20/03/2023	219.91.190.195	Mr. Parth Rajanikant Pandya	11
2.	24/03/2024	123.201.67.135	Mr. Manish Jethabhai Bhaskar	12
			Mr. Pravinbhai Lakhabhai Parmar	16
3.	07/04/2023	123.201.65.79	Ms. Narmadaben Pravinbhai Parmar	15
			Mr. Nitinkumar Lalji Bhai Bharvad	13

32.7. From the table above, I note that the bank account of the aforesaid 5 entities were operated from the same IP on same dates and these IPs belong to a broadband service provider viz. 'You Broadband' in Gujarat. The IPDR and mobile number associated with these IPs were sought from 'You Broadband'. The information received from 'You Broadband' showed that all the three IPs belong to the same customer viz. ' Mr. Mrugesh Ruparel' and had a common mobile number 9327771812, common MAC address 'B0A7B9092AC9',

common address 'TF 14, Ajanta Commercial Centre,, Near Income Tax, Ashram Road' and common registered email id as: 'nikunjsoni06@gmail.com'.

- 32.8. From the analysis of the IP for trades and internet banking login IP provided by IDBI Bank and Axis Bank, I note that the bank accounts of Noticees 1 to 10, 14, 17 and 18 namely were operated from the office of Noticee 1 and it was concluded that Noticee 2, who was the director of Noticee 1 was handling and operating the trading and banking accounts of these 13 entities, i.e. Noticees 1 to 10, 14, 17 and 18.
- 32.9. Further, internet banking login IP provided by Karur Vysya Bank revealed that the banking accounts of Noticees 11, 12, 13, 15 and 16 were operated by Mr. Mrugesh Ruparel, i.e. Noticee 19.
- 32.10. Role of Mr. Mrugesh Ruparel (Noticee 19) and Mr. Arpit Piyushbhai Shah (Noticee 20): The analysis of the bank account statement of a proprietorship firm viz. M/s Prime Trading Co. revealed several bank transactions with Noticee 19, Mr. Mrugesh Ruparel (also known as 'Mrugesh Natwarlal Ruparel'). Bank statement, KYC and AOF of Noticee 19 were sought from IDBI bank and pursuant to analysis of his bank statement, I note that there were few banking transactions of small amounts with a UPI id 'nikunjsoni06@okicici' which coincided with the email ID name of 'You Broadband' connection. To verify the same, KYC, AOF and bank statement were obtained from ICICI Bank for the bank account associated to said UPI id. Analysis of the details received revealed that the UPI transactions were done from the bank account of a person viz. Mr. Nikunj Dinesh Bhai Soni with registered mobile number as 9327771812. This is the same mobile number registered with 'You Broadband' connection as mentioned above. Thus, I note that Noticee 19, who was having bank transactions with M/s Prime Trading Co., is the same person on whose name the 'You Broadband' internet connection was registered and through the same internet connection, bank accounts of Noticees 11, 12, 13, 15 and 16 were being operated. Furthermore, following bank transactions were observed from the bank statement of Mr. Mrugesh Ruparel:

Date	Entity Name	Credit amount (Rs.)	Debit amount (Rs.)
04/02/2023	Mr. Kuntal Trivedi (Noticee 4)	15,000	-
23/12/2023	Mr. Parth Pandya (Noticee 11)	50,000	-
07/08/2023	M/s Rajni Enterprise	49,000	-
26/09/2023		33,500	
03/10/2023		30,500	
30/11/2023		30,000	
21/08/2023	M/s Vinit Enterprise	37,500	-
04/09/2023		36,500	
30/10/2023		25,500	
06/11/2023		20,000	
29/08/2023	M/s Kiran Enterprise	52,000	-
12/09/2023	M/s Hiren Enterprise	43,500	
06/12/2023		70,000	
Many Dates	M/s Prime Trading Co.	75,25,800	70,99,000

32.11. From the above table, I note that Noticee 19 was having bank transactions with 2 entities and 5 common partnership/ proprietorship firms (which had funds transfer with entities). Thus, it was concluded that Noticee 19 was connected to these entities. Further, I note from the analysis of the bank account statements of M/s Prime Trading Co. and Noticee 19, that there were several bank transactions observed with Mr. Arpit Piyushbhai Shah, Noticee 20. The KYC, AOF and Bank statement of Noticee 20 were obtained and the following bank transactions were observed from the analysis of the bank statement of Noticee 20 as received from Gujarat State Cooperative Bank.

Date	Entity Name	Noticee No.	Credit amount (Rs.)	Debit amount (Rs.)
21/06/2023	Mr. Parth Pandya	11	10,500	-
26/05/2023	Mr. Manish Bhaskar	12	1,24,000	-
21/06/2023	Mr. Narmada Parmar	15	1,10,000	-
26/05/2023	Mr. Nitin Bharvad	13	-	74,000
21/06/2023	Mr. Nitin Bharvad	13	37,349	-
12/09/2023	M/s Hiren Enterprise		43,500	
06/12/2023			70,000	
Many dates*	M/s Prime Trading Co.		2,24,450	5,00,000
Many dates	Mr. Mrugesh Ruparel	19	2,40,532	11,370

32.12. From the above table, I note that Noticee 20 was having banking transactions with Noticees 11, 12, 13 and 15 and Noticee 19 (who was operating bank

accounts of Noticees 11, 12, 13 and 15). Also, Noticee 20 had banking transaction with a common partnership/proprietorship firm viz. M/s Hiren Enterprise (which had funds transfers with entities) and numerous banking transactions with a common partnership/proprietorship firm viz. M/s Prime Trading Co. I note that he has received a credit of Rs. 5,000 from M/s Prime Trading Co. on 19/04/2023 which was used for bill payment of Rs. 4,956 to You Broadband on same date. In this regard, details of broadband account for which this payment was made were sought from You Broadband. As per the response provided by You Broadband, the broadband account belonged to Noticee 19.

32.13. Thus, I note that Noticee 19 and Noticee 20 were connected to each other and both of them were also acquainted with entities and proprietorship firms which had funded entities for the trading in the scrip of Quasar. I further note that both of them were using You Broadband Internet connection for managing the accounts of Noticees 11, 12, 13, 15 and 16.

33. Analysis of CDRs of entities: The Call Data Records (CDRs) and CAF (Customer Application Forms) of the mobile numbers of entities were sought from TSPs. Based on the analysis of CDRs of entities, following common calls between few entities are observed:

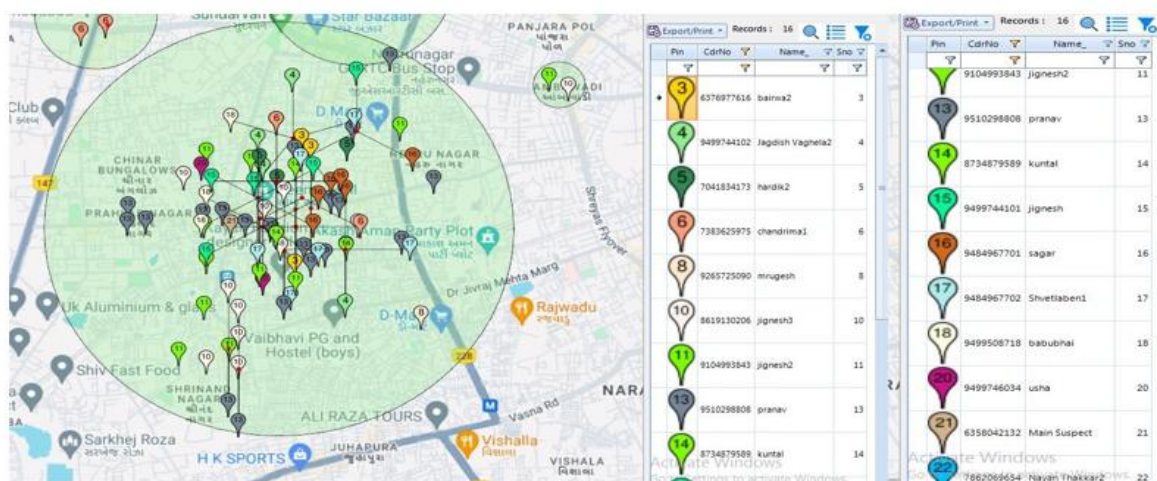
Name of person 1	Name of person 2	No. of common Calls/SMS
Mr. Mrugesh Natwarlal Ruparel (Suspect & Operator) (Noticee 19)	Mr. Arpit Piyushbhai Shah (Suspect & Operator) (Noticee 20)	28
Mr. Sagar Kumar Dataniya (Noticee 18)	Mr. Shvetalben Sagarbhai Dataniya (Noticee 17)	3783
Mr. Sagar Kumar Dataniya (Noticee 18)	M/s Chandrima Mercantiles Ltd (Noticee 1)	4
Mr. Pranav Kamleshkumar Trivedi (Noticee 2)	M/s Chandrima Mercantiles Ltd (Noticee 1)	27
Mr. Arpit Piyushbhai Shah Shah (Suspect & Operator) (Noticee 20)	Mr. Manish Jethabhai Bhaskar (Noticee 12)	1
Mr. Pranav Kamleshkumar Trivedi (Noticee 2)	Jigneshkumar Purshottamdas Patel (Noticee 5)	27
Mr. Jigneshkumar Purshottamdas Patel (Noticee 5)	Mr. Rohit Bairwa (Noticee 6)	35

33.1. From the table above, I note that Noticees 1, 2, 5, 6 and 18 had calls among them. Further, there was also an SMS being sent from the mobile number of Noticee 12 to Noticee 20, who was alleged to be handling the accounts of

entities along with Noticee 19. Furthermore, there were calls/sms found between Noticee 19 and Noticee 20 which shows the connection between them.

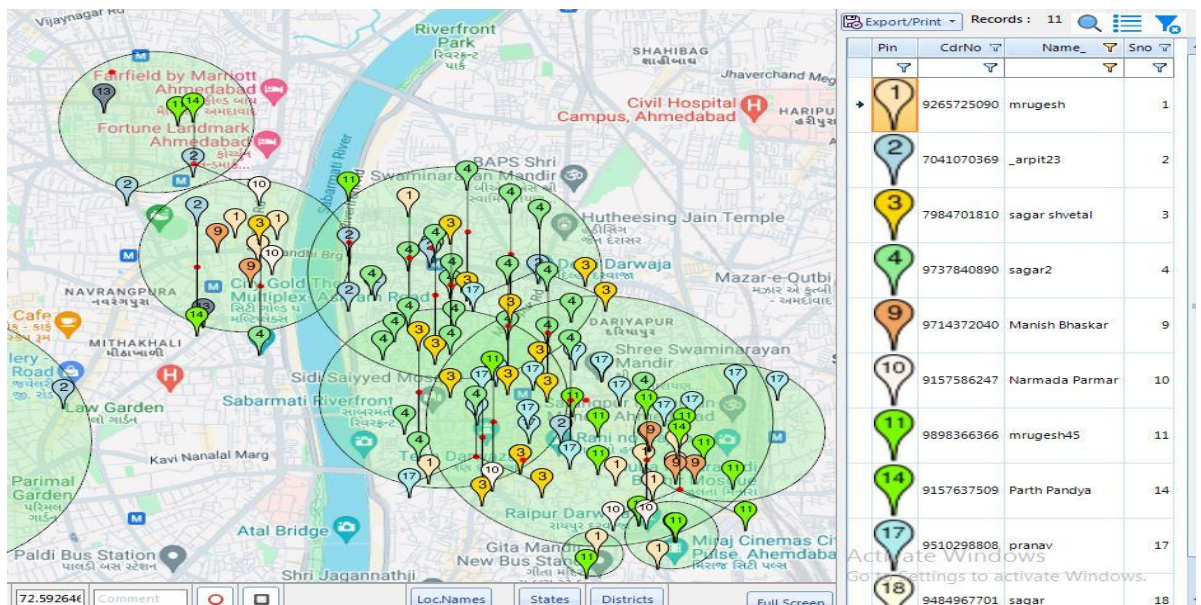
34. Geo-Location/Tower Location Analysis of mobile number of entities: As per the geo-location analysis done using CDRs for a sample period (Mar 10, 2023 – April 14, 2023) in Patch 2, I note that there were three common locations between the entities along with Noticee 19 and Noticee 20. The three common locations comprised of 2 common locations in Ahmedabad and 1 common location in Mumbai. The analysis of geo-location was carried out within the proximity range of 500 meters to 600 meters and the following screenshots were generated accordingly for each Geo location.

34.1. Geo-location 1 (Ahmedabad)



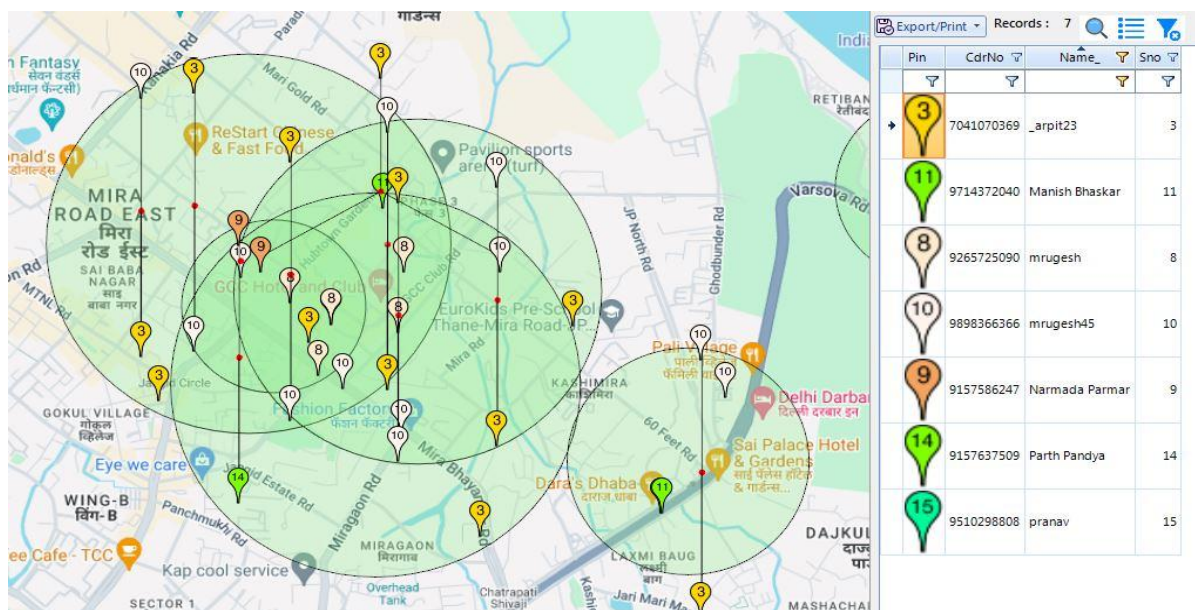
34.1.1. As per the above geo location map, the entities viz. Noticees 1, 2, 3, 4, 5, 6, 8, 9, 10, 14, 17 and 18 were found to be present at same location in Ahmedabad, Gujarat on multiple days including the days when they traded in scrip of Quasar. The above location coincided with the area of the office location of Noticee 1. Noticee 2 was present at this geo location for multiple days with other entities in tandem.

34.2. Geo-location 2 (Ahmedabad)



34.2.1. The above geo location map highlights that Noticees 2, 19 and 20 were found to be present at same location on many days almost at same time along with Noticees 11 and 12.

34.3. Geo-Location 3 (Mumbai –Mira Road)



34.3.1. From above geo location map, I note that Noticee 19 was found to be present in Mumbai at same location along with Noticees 11, 12, 15 and 20.

34.4. Observations from the overall Geo-analysis of three locations:

34.4.1. For first common location in Ahmedabad, I note that mobile numbers (used for trading in scrip of Quasar) of Noticees 1, 2, 3, 4, 5, 6, 8, 9, 10, 14, 17, 18 were found to be present at the same geo-location in Ahmedabad on multiple days including the days when these entities traded in scrip of Quasar. The above geo-location coincides with the office location of M/s Chandrima Mercantiles Ltd which is “B-712 Seven Floor Titanium City Centre, Near Sachin Tower, 100 Feet, Anandnagar Road, Ahmedabad, Gujarat – 380 015”.

34.4.2. For second common location in Ahmedabad, the mobile numbers of Noticees 2, 19 and 20 were found to be together.

34.4.3. While for third common location in Mumbai, mobile numbers of Noticees 19 and 20 were found together along with Noticees 11, 12 and 15.

34.4.4. Thus, from the geo-location analysis and observations made during the analysis of IPs of Internet banking login by entities above, it was concluded that Noticees 2, 19 and 20 were together operating the accounts of Noticees 1 to 18 and were manipulating the scrip of Quasar.

35. Statement recording of Mr. Pranav Trivedi & M/s Chandrima Mercantiles Ltd - Vide summon dated May 13, 2024, Noticee 2 was advised to appear before the IA for statement recording on June 04, 2024. Since he was MD & CFO of Noticee 1, he also appeared on behalf of Noticee 1 for statement recording on June 04, 2024. In his recorded statement, he, inter-alia, submitted the following:

35.1. He doesn't know anything about the business activity of Noticee 1, including its financial transactions. He rarely visits the office of Noticee 1 and only signs the documents on behalf of the company.

35.2. The CA of the company (Mr. Gaurav Bachani) manages operations of the company and employees of Mr. Bachani sit in the office of the company. The CA of the company manages the trading and banking account of Noticee 1.

35.3. He is not aware of his trades in the scrip of Quasar India Limited.

35.4. He doesn't know any of the other persons (viz. the entities) or any of the firms which were found to be common among entities.

36. Statement recording of Mr. Gaurav Bachani: I note that Noticee 1 was having banking transactions with several entities and in order to ascertain the functioning and management of the financial activities of the company, Mr. Gaurav Bachani, who is secretarial auditor of Noticee 1, was summoned for statement recording. Vide summon dated June 06, 2024, 2024, Mr. Gaurav Bachani was advised to appear before the IA for statement recording on June 13, 2024, however, Mr. Gaurav Bachani, requested for statement recording to be conducted on June 11, 2024. The request was acceded to by IA and he was advised to appear on June 11, 2024 for statement recording. The submissions of Mr. Gaurav Bachani in his recorded, inter-alia, are as under:

- 36.1. He is a CS and owns a CS firm viz. M/s Gaurav Bachani & Associates.
- 36.2. He works as Secretarial Auditor of Noticee 1 since 2019-20. His work for the company is limited to filing compliance related reports.
- 36.3. He knows Noticee 2 as a director of Noticee 1. He meets Noticee 2 1-2 times a month at his firm's office for company related work. Apart from Noticee 2, he knows the two independent directors of company viz. Mr. Pranav Vajani and Mr. Ziral Soni, both of whom are also company secretary and he has professional relation with them.
- 36.4. He submitted that Noticee 1 has no business operations and he or his employees do not visit the office of the company.
- 36.5. He is not aware of the trading done by Noticee 1 and any of the bank transactions done by the company.
- 36.6. He is not getting any remuneration for his CS services from Noticee 1 and has no business association with the company.
- 36.7. He doesn't know any of the entities or any of the firms found to be common among entities in their bank statements.

37. Further, for query as to why he was rendering his services to Noticee 1 without any fees or remuneration, he did not give any reply. Also, he submitted that mobile

number 9016614449 belongs to his firm and he is not aware of any call from this mob number to Noticee 6.

38. Observations/inferences from recorded statements:

- 38.1. Noticee 2 and Mr. Gaurav Bachani, both gave contradictory submissions in their statements with respect to the handling of the business operations of Noticee 1 and denied any trading done by them on behalf of company or any bank transactions executed by the company.
- 38.2. Both, Noticee 2 and Mr. Gaurav Bachani denied their connection with any of the entities or common entities. However, bank transactions have been observed between Noticee 2 with entities and common entities as well as call data records with entities. Further, there is also a call observed between Mr. Gaurav Bachani and one of the entity.
- 38.3. Mr. Gaurav Bachani, is lending his CS services to Noticee 1 without any remuneration or fees. This is very unusual as no CS or CA firm will offer its services to a company without any consideration.
- 38.4. Both, Noticee 2 and Mr. Gaurav Bachani deliberately did not provide correct information and misled the investigation and thus aided in concealing the true facts and information which could have helped in investigation.

39. In view of the foregoing observations, I note that Noticee 2 along with Noticees 19 and 20 were operating the trading and banking accounts of the entities for trading in the scrip of Quasar and manipulating the scrip by generating high volumes and rise in price of the scrip of Quasar and thus, making a profit of Rs 1.96 Crores. Further, Noticees 1 and Noticees 3 to 18 aided and abetted Noticees 2, 19 and 20 for manipulating the scrip of Quasar by lending their trading and bank accounts and thus, were involved in fraud of manipulating the scrip of Quasar. The high volume and price rise in the scrip of Quasar misled the gullible investors and attracted them for trading in the shares of Quasar and such manipulation in the scrip of Quasar was detrimental for the overall securities market.

40. Noticees 1 and 2 contended that their trading was miniscule in comparison to the total market volume, and such trading cannot have any impact on the market. I note that Noticees 1 and 2, along with other Noticees contributed 16.86% to buy volume and 19.74% to sell volume in the scrip of Quasar during IP. The entities were found to be connected to each other and were indulged in generating the volume in the scrip of Quasar resulting in price rise of the scrip. Thus, trading by Noticee 1 or 2 has been considered collectively for all the Noticees and not individually. Therefore, Noticee 1 and 2's contention cannot be accepted.
41. Noticees 1 and 2 submitted that the trading and investment decisions were taken by them based on the market dynamics, technical analysis and potential intra-day movements. I note that the SCN clearly states the amount of substantial gains made by the Noticees within a short period in equity trades, without any substantial news or development in the operations of Quasar India Limited. Noticees 1 and 2 did not provide any reasons for their choice to trade in the scrip, and only stated that their decisions were based on technical analysis. In the absence of such reasons, and on the basis of their connections with other Noticees, IP based connections, geo-location analysis of mobile numbers of entities, I find that the Noticees artificially traded in a scarcely traded scrip, thereby contributing to volume in the scrip of Quasar during the IP and misleading the gullible investors to trade in the scrip. Therefore, I find that the submissions are vague, and not acceptable.
42. Noticees 1 and 2 submitted that they do not have any direct or indirect contact with the promoters of Quasar India Limited. I note that there is no such allegation made out against them in the SCN.
43. Noticees 1 and 2 also submitted that one of the primary reasons for engaging in the shares of Quasar was the higher trading volumes observed on certain days. In this regard, I note from the SCN that during Patch 1, 9 entities, including Noticees 1 and 2, collectively generated around 75% volume (7,82,174 shares) to the total market volume in the scrip of Quasar for all the 16 high volume trading days of

Quasar. Further, in Patch 2, the scrip of Quasar traded for 40 trading days wherein 31 trading days observed high volumes and there was a substantial price rise observed. During this Patch, 9 entities of Patch 1, initially began trading among themselves and then subsequently were joined by remaining 9 entities for trading in the scrip of Quasar. Together, the 18 entities traded amongst themselves and either on buy/sell side and artificially contributed to the high volume in the scrip of Quasar for 23 trading days out of total 31 high volume trading days. The high volume generation also resulted in rise in the price of the scrip of Quasar which was misleading and attracted the normal investors to trade in scrip of Quasar. Thus, I note that the 18 entities, including Noticees 1 and 2, are responsible for generating volume in the scrip of Quasar. Therefore, the submissions that they traded in the scrip after observing high trading volumes cannot be accepted.

44. Noticees 1 and 2 submitted that in order to allege creation of artificial price and volume, the entities should be shown connected to each other. They also submitted that mere fund transfers between them and their counterparties cannot be considered as connection between them, as the transactions were in normal course of business. I note that the fund transfers at the least show the acquaintance of Noticees 1 and 2 with their counterparties. I also note that Noticees 1 and 2 had common phone calls, fund transfers, common geolocation, and also common IP with other entities. Thus, the contention of Noticee 1 and 2 that no connection has been shown or no evidence is placed on record to show connections among entities, cannot be accepted.

45. Noticees 1 and 2 further submitted that there was hearsay news in the APMC market, Ahmedabad, that Quasar will be acquired by Shah Group (Ahmedabad based commodity merchant), and for this reason, Noticees 1 and 2 and perhaps the other Noticees too, who appear to be working in and around APMC had also traded in the scrip. However, when Noticees 1 and 2 found that Quasar will not be acquired by Shah group, they sold the shares. In this regard, I note that Noticees 1 and 2 did not provide the specifics in support of their submission as to when the

two news had surfaced. I also note that Noticees 1 and 2 were holding the shares of Quasar for some months, and also did various intra-day transactions and thereafter sold the shares at high profits after substantial increase in the volumes and price of the shares of Quasar. I further note that Noticees 1 and 2 have not convincingly demonstrated the rationale, technical or otherwise, behind their trading in the scrip of Quasar. Also, they are connected with other entities who were also responsible for artificial volume creation and circular trades. Therefore, the submissions of the hearsay news appear to be after-thought, and therefore, cannot be accepted.

46. Noticees 1 and 2 submitted that Ahmedabad covers an area of 505km, and the range of a network tower cannot be the basis to allege connections among the Noticees. I note that geo-location is not the sole basis to alleged connections. The Noticees are connected through common calls, IPs, geo-location, mobile numbers, timing. All the connections have already been brought out in the previous paragraphs and were also stated in the SCN. In view of the same, Noticees 1 and 2's submissions cannot be accepted.

47. The findings in the foregoing paragraphs are summarised below:

47.1. The 18 entities (Noticees 1 to 18) and Noticees 19 and 20 were found to be connected to each other and were indulged in generating the volume in the scrip of Quasar resulting in price rise of the scrip. Further, the entities viz. the 1% shareholders of Quasar in connivance with other entities were key perpetrators in manipulating the scrip of Quasar and thus misled the investors into investing in scrip of Quasar which otherwise was very thinly traded.

47.2. Therefore, the allegation that Noticees 1 to 18 have violated the provisions of Section 12A (a), (b) and (c) of SEBI Act read with Regulations, 3(a), (b), (c), (d), 4(1), 4(2)(a) and 4(2)(b) and 4(2)(e) of PFUTP Regulations, stands established.

47.3. Also, as Noticees 19 and 20 aided and abetted Noticee 2 in manipulating the scrip of Quasar, the allegation that they have violated the provisions of Section

12A (a), (b) and (c) of SEBI Act read with Regulations 3(a), (b), (c), (d), 4(1), and 4(2)(a) of PFUTP Regulations, stands established.

47.4. Noticees 2, 3, 5, 7, 11, 12, 13, 15 and 16, by entering into circular trades have created a misleading appearance of trading in the scrip by trading among themselves in the share of Quasar without any intention of change of ownership of the security and provide a false appearance of trading in such security to inflate or cause fluctuations in the price of Quasar. Therefore, the allegation against Noticees 2, 3, 5, 7, 11, 12, 13, 15 and 16, that they have violated the provisions of Section 12A (a), (b) and (c) of SEBI Act read with Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a), 4 (2)(b), 4(2)(e), 4(2)(g) and 4(2)(n) of PFUTP Regulations, stands established.

48. Hampering the process of investigation –

48.1. I note that Noticee 20 was having banking transactions with Noticees 11, 12, 13 and 15 and Noticee 19 (who was operating bank accounts of Noticees 11, 12, 13 and 15).

48.2. Therefore, summons were issued to them on July 31, 2024, September 26, 2024 and October 03, 2024. However, Noticees 19 and 20 did not appear for statement recording even after multiple summons were issued to them. This has hampered the process of investigation in ascertaining more facts and information.

48.3. I note that Noticees have been alleged to have violated the provisions of Section 11C(3) of SEBI Act for not appearing upon issuance of multiple summons. However, Section 11C(3) of SEBI Act pertains to not furnishing of information sought by the Investigating Authority. I note that not appearing before the investigating authority upon issuance of the summons attracts violation of provisions of Section 11C(5) of the SEBI Act, and accordingly the same is being considered.

48.4. Therefore, I find that Noticees 19 and 20 have violated the provisions of Section 11C(5) of SEBI Act.

ISSUE II - Do the violations, if any, attract penalty u/s 15HA and 15A(a) of the SEBI Act?

49. I note that since the above violations are established, the Noticees are liable for monetary penalty u/s 15HA and 15A(a) of the SEBI Act, as applicable, the text of which is reproduced hereunder:

SEBI Act

Penalty for failure to furnish information, return, etc.

15A. *If any person, who is required under this Act or any rules or regulations made thereunder,—*

(a) to furnish any document, return or report to the Board, fails to furnish the same or who furnishes or files false, incorrect or incomplete information, return, report, books or other documents, he shall be liable to a penalty which shall not be less than one lakh rupees but which may extend to one lakh rupees for each day during which such failure continues subject to a maximum of one crore rupees;

Penalty for fraudulent and unfair trade practices.

15HA. *If any person indulges in fraudulent and unfair trade practices relating to securities, he shall be liable to a penalty which shall not be less than five lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of such practices, whichever is higher.*

ISSUE III - If so, what would be the monetary penalty that can be imposed taking into consideration the factors mentioned in Section 15J of SEBI Act?

50. While determining the quantum of penalty u/s 15HA and 15A(a) of the SEBI Act, it is important to consider the factors stipulated in Section 15J of the SEBI Act, which read as under:

SEBI Act

15J *While adjudging quantum of penalty under section 15-I, the adjudicating officer shall have due regard to the following factors, namely*

(a) the amount of disproportionate gain or unfair advantage, wherever quantifiable, made as a result of the default;

- (b) the amount of loss caused to an investor or group of investors as a result of the default;
- (c) the repetitive nature of the default.

51. In the present matter, I note that Noticees 1 to 18 collectively made profit of Rs. 1.96 crores by trading in the scrip of Quasar during the IP. No quantifiable figures are available to assess the disproportionate gain or unfair advantage made as a result of the defaults by Noticees 19 and 20. Further, from the material available on record, it is not possible to ascertain the exact monetary loss to the investors /clients on account of default by the Noticees. As per the available records, I note that Noticee 19 has been penalised earlier under Section 15HA and 15A(a) of SEBI Act. Therefore, suitable penalty must be imposed for non-compliances in order to ensure that the violations can be prevented in future.

ORDER

52. Having considered all the facts and circumstances of the case including delay in issuing of SCN, the material available on record, time value of the unlawful gain, submissions made by Noticees 1 and 2, and the factors mentioned in Section 15J of the SEBI Act, in light of judgment of the Hon'ble Supreme Court in SEBI vs. Bhavesh Pabari (2019) 5 SCC 90, in exercise of power conferred u/s 15-I of the SEBI Act r/w Rule 5 of the SEBI Adjudication Rules, I impose the following penalty upon the Noticees for the violations as mentioned hereunder.

Noticee No.	Name of Noticee	Provisions violated	Penalty under	Penalty Amount
2	Pranav Kamlesh kumar Trivedi	Section 12A (a), (b) and (c) of SEBI Act r/w Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a), 4(2)(b), 4(2)(e), 4(2)(g) and 4(2)(n) of PFUTP Regulations.	Section 15HA of SEBI Act	Rs. 2,50,00,000/- (Rs. Two Crore Fifty Lakhs Only) to be paid jointly and severally by Noticees 1 to 18
3	Nayan Mahendrabhai Thakkar			
5	Jigneshkumar P. Patel			
7	Ankit Ajitbhai Panchal			
11	Parth Rajanikant Pandya			

Noticee No.	Name of Noticee	Provisions violated	Penalty under	Penalty Amount
12	Manish Jethabhai Bhaskar			
13	Nitinkumar Lalji Bhai Bharvad			
15	Narmadaben Pravinbhai Parmar			
16	Pravinbhai Lakhabhai Parmar			
1	Chandrima Mercantiles Limited	Section 12A (a), (b) and (c) of SEBI Act r/w Regulations, 3(a), (b), (c), (d), 4(1), 4(2)(a) and 4(2)(b) and 4(2)(e) of PFUTP Regulations.		
4	Kuntal Jitendra Trivedi			
6	Rohit Bairwa			
8	Hardik Himmatbhai Munjpara			
9	Jagdish Chhanabhai Vaghela			
10	Usha Devi			
14	Babubhai Bhikhaji Godha			
17	Shvetalben Sagarbhai Dataniya			
18	Sagarkumar P. Dataniya			
19	Mrugesh Natwarlal Ruparel	Section 12A (a), (b) and (c) of SEBI Act r/w Regulations, 3(a), (b), (c), (d), 4(1), 4(2)(a); Section 11C(5) of SEBI Act.		Section 15HA and 15A (a) of SEBI Act
20	Arpit Piyushbhai Shah			Rs. 7,00,000/- (Rs. Seven Lakhs Only)

I find the said penalty to be commensurate with the violation on the part of the Noticees.

53. Noticees shall remit / pay the said amount of penalty within 45 days of receipt of this order through online payment facility available on the website of SEBI, i.e. www.sebi.gov.in on the following path, by clicking on the payment link:

ENFORCEMENT → Orders → Orders of AO → PAY NOW.

54. In the event of failure to pay the said amount of penalty within 45 days of the receipt of this Order, SEBI may initiate consequential actions including but not limited to recovery proceedings u/s 28A of the SEBI Act for realization of the said amount of penalty along with interest thereon, *inter alia*, by attachment and sale of movable and immovable properties.

55. In terms of Rule 6 of the SEBI Adjudication Rules, copy of this order is sent to the the Noticees and also to SEBI.

DATE: OCTOBER 31, 2025

PLACE: MUMBAI

**AMIT KAPOOR
ADJUDICATING OFFICER**