

BEFORE THE ADJUDICATING OFFICER
SECURITIES AND EXCHANGE BOARD OF INDIA
[ADJUDICATION ORDER NO. Order/AK/DS/2025-26/31789]

**UNDER SECTION 15 I OF 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;**

**Late Ms. Geeta Devi Agarwal
(PAN: ACYPA2148P)**

In the matter of Trading in Illiquid Stock Options at BSE

BACKGROUND OF THE CASE

1. Securities and Exchange Board of India (hereinafter referred to as “**SEBI**”) observed large scale reversal of trades in stock options segment of Bombay Stock Exchange (hereinafter referred to as “**BSE**”). SEBI observed that such large scale reversal of trades in stock options led to creation of artificial volume at BSE. In view of the same, SEBI conducted an investigation into the trading activities of certain entities in illiquid stock options at BSE for the period from April 1, 2014 to September 30, 2015 (hereinafter referred to as “**Investigation Period /IP**”).
2. Pursuant to investigation, it was observed that total 2,91,744 trades comprising substantial 81.40% of all the trades executed in stock options segment of BSE during the IP were non genuine trades. The aforesaid non-genuine trades resulted into creation of artificial volume in stock options segment of BSE during the IP. It was observed that Late Ms. Geeta Devi Agarwal (PAN–ACYPA2148P) (hereinafter referred to as the “**Noticee**”) was one of the entities who indulged in execution of reversal trades in stock options segment of BSE during the IP. Such trades were observed to be non-genuine in nature and created false or misleading appearance of trading in terms of artificial volumes in stock options and therefore were alleged to be manipulative, deceptive in

nature. In view of the same, SEBI initiated adjudication proceedings against the Noticee for violation of the provisions of Regulations 3(a), (b), (c), (d), 4(1) and 4(2)(a) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003 (hereinafter referred to as “**PFUTP Regulations**”).

APPOINTMENT OF ADJUDICATING OFFICER

3. SEBI appointed Ms. Versha Agarwal as the Adjudicating Officer(AO) in the matter, vide Order dated September 20, 2021, u/s 19 r/w Section 15-I(1) of the SEBI Act, 1992 (hereinafter referred to as “**SEBI Act**”) and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (hereinafter referred to as “**SEBI Adjudication Rules**”) to conduct adjudication proceedings in the manner as specified under Rule 4 of the SEBI Adjudication Rules r/w Section 15-I(1) and (2) of SEBI Act, and if satisfied, impose such penalty as deemed fit in terms of Rule 5 of the SEBI Adjudication Rules and Section 15HA of SEBI Act. Subsequently, the undersigned was appointed as the Adjudicating Officer in the matter, vide Order dated April 03, 2025.

SHOW CAUSE NOTICE, REPLY AND HEARING

4. A Show Cause Notice dated March 09, 2022 (hereinafter referred to as ‘**SCN**’) in terms of Rule 4(1) of the SEBI Adjudication Rules was issued to the Noticee, through SPAD, to show-cause as to why an inquiry should not be initiated against her for the alleged violation of Regulations 3(a),(b),(c),(d) and 4(1), 4(2)(a) of PFUTP Regulations, and why penalty should not be imposed u/s 15HA of the SEBI Act, for the violations alleged to have been committed by the Noticee.
5. With regard to the aforementioned SCN, vide email dated October 06, 2025, the undersigned was informed regarding the death of the Noticee. A scanned copy of the Death certificate of the Noticee, issued by South Dum Dum Municipality was also provided in support of the information. The death certificate shows that the Noticee passed away on April 19, 2017.

6. Before proceeding further in the matter on merit, it would be in the fitness of things to first decide as to whether on the death of the Noticee, the present adjudication proceedings against her would continue or abate.
7. In this regard, it is worth mentioning that in ***Girijanandini Vs Bijendra Narain (AIR 1967 SC 2110)***, the Hon'ble Supreme Court held that in case of personal actions, i.e., the actions where the relief sought is personal to the deceased, the right to sue will not survive to or against the representatives and in such cases the maxim *actio personalis moritur cum persona* (personal action dies with the death of the person) would apply. It is also relevant to refer to the decision of Hon'ble Securities Appellate Tribunal in ***Chandravadan J. Dalal vs. SEBI*** (Appeal No. 35/2004 decided on June 15, 2005), wherein it was held that: "*The appeal abates since the appellant during the pendency of the appeal died on 29th November 2004. The appeal accordingly abates. The penalty imposed on the original appellant being personal in nature also abates.*"
8. In view of the foregoing, I note that the instant adjudication proceedings against the Noticee is liable to be abated without going into the merits of the case qua her and the SCN dated March 09, 2022 issued against her is disposed of accordingly.
9. In terms of Rule 6 of the SEBI Adjudication Rules, copy of this order is sent to the Noticee's last known address and also to SEBI.

Place: Mumbai

Date: November 21, 2025

**AMIT KAPOOR
ADJUDICATING OFFICER**