



**भारतीय प्रतिभूति
और विनिमय बोर्ड**
**Securities and Exchange
Board of India**

By Speed Post A.D.

**Adjudicating Officer
Enquiries and Adjudication Department (EAD) – EAD 3**

SEBI/HO/EAD-3/JS/DJ/OW/ P/17087- 9 /1/2019
July 5, 2019

1	Santosh Kumar Agarwal H No. 301, Ratan Dham Apartment, 12/483, M C Roberts Ganj, Near Society Motors, Kanpur, Uttar Pradesh – 208001	2	Kamta Prasad Pandey 104 A/138, Ram Bagh, Kanpur, Uttar Pradesh - 208012	3	Success Vyapar Private Limited 23/1, Principal Khudiram Bose Road, Kolkata - 700037
4	Raj Kumar Agarwal 35/48 A, Chak No. 035, Bangali Mohala, Kanpur, Uttar Pradesh - 208001	5	Anant Fin Consultancy Pvt. Ltd. 113/93 Shreedham Apartment Swaroop Nagar, Kanpur, Uttar Pradesh - 208002	6	Sanjay Jain 32/47 Ghumani Bazar, Kanpur, Uttar Pradesh - 208001
7	Anurag Khandelwal 77/78-b Gandhi Gram G.t Road Kanpur, Uttar Pradesh - 208007	8	Rishi Kant Awasthi 20/24 Patkapur Kanpur, Kanpur, Uttar Pradesh - 208001	9	Adinath Shares and Commodities Private Limited 32 / 47 Ghumani Bazar, Kanpur, Uttar Pradesh - 208001
10	Rajesh Agarwal House no. C 1316 Indira Nagar, Lucknow, Uttar Pradesh - 226005	11	Manoj Agarwal 14/75, Gopal Vihar Society, Civil Lines, Kanpur - 208001	12	Kpk Fin Consultancy Private Limited 32/13- Ghumani Bazar, Kanpur, Uttar Pradesh - 208001
13	Kavita Awasthi 20/24 Chak No. 20 Chatai Mohal, Kanpur, Uttar Pradesh - 208001	14	Dheeraj Agarwal 36/40 Hata Ram Mohan Ka Galish Bazar Kanpur, Uttar Pradesh - 208001	15	Sanjai Jain Huf 32/47 Ghumani Bazar Kanpur, Kanpur, Uttar Pradesh - 208001
16	Neil Industries Ltd 14/113, 402-403, Kan Chambers, civil Lines, Kanpur, Uttar Pradesh - 208001	17	Ankit Jain 873/23, Anand Nagar, Jagaipurwa, Kanpur, Uttar Pradesh - 208007	18	Shubhang Exports Ltd House No 30 21 Maheshwari Mohal, Kanpur, Uttar Pradesh - 208001
19	Priyanshi Securities Limited 113/93, Shridham Apartment, Swaroop Nagar, Kanpur, Uttar Pradesh - 208002	20	Raghuvansh Agrofarms Ltd 16-19-a Civil Lines, Kanpur, Uttar Pradesh - 208001	21	Sonali Agarwal 36/40, Hata Ram Mohan, Gilish Bazar, Kanpur, Uttar Pradesh - 208001
22	Surendra Kumar Gupta 51/40, Nayaganj, Kanpur, Uttar Pradesh - 208001	23	Umesh Kumar Agarwal 301 Ratan Dham Appartment Macrobert Ganj, Kanpur, Uttar Pradesh - 208001	24	Manoj Kumar Agarwal 53/07 Naya Ganj, Kanpur, Uttar Pradesh, 208001

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400 051.

दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर.एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in

Page 1 of 10

SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051.

Tel.: 2644 9950 / 4045 9950 (IVRS), 2644 9000 / 4045 9000 Fax : 2644 9019 to 2644 9022 Web : www.sebi.gov.in



अनुवर्ती :
Continuation :

**भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India**

25	Shreesh Agrawal 91, Darbhanga Colony Allahabad, Uttar Pradesh - 211002 And 6/6 Idgah Rambagh , Allahabad, Uttar Pradesh, 211003	26	Scope Vyapar Pvt. Ltd 23/1 , Principal Khudiram Bose Road, Kolkata, West Bengal - 700006	27	Narendra Kumar Jain 11a Ballygunge Circular Road Aditi Apartment, Kolkata, West Bengal - 700019
28	Rajendra Kumar Gupta 53/7 Naya Ganj, Kanpur, Uttar Pradesh - 208001	29	Rich Udyog Network Limited 7 / 125 C 2 Swaroop Nagar Kanpur, Uttar Pradesh - 208002	30	Som Prakash Goenka H.no.51/40, Nayaganj, Kanpur, Kanpur, Uttar Pradesh - 208001
31	Samtal Financial System Ltd 78, Kalitala Road, Kalikapur, 3rd Floor, Above SBI Kalikapur Branch, Kolkata, West Bengal - 700078	32	Manish Agarwal 53/07, Nayaganj, Kanpur, Uttar Pradesh - 208001	33	Praveen Kumar Agnihotri H No-123, Patrakarpuram, Nawabganj, Nr Zoo, Kanpur, Uttar Pradesh - 208002
34	Taurus Data Links Pvt. Ltd H No-16/19-a, Civil Lines, Kanpur, Uttar Pradesh - 208001	35	Subodh Agarwal 16/19, A Civil Lines Kanpur, Uttar Pradesh - 208001	36	Rajni Gupta 51/40, Naya Ganj Goldiee House Kanpur , Uttar Pradesh - 208001
37	Anuradha H.no. 965 Ratan Lal Nagar Kanpur, Uttar Pradesh - 208022	38	Madhu Rani Goenka 31/71 Lathi Mohal,, Kanpur, Uttar Pradesh - 208001	39	Varsha Maheshwari 117H - 1/244, Model Town, Pandu Nagar, Kanpur, Uttar Pradesh - 208005
40	Sanmukh Vincom Private Limited No 16-2-380 & 382, Office No 11, Upper Ground Floor, Landmark Centre, Siddiamberbazar, Hyderabad, Telangana - 500012	41	Neharika Gupta 51/40 Nayaganj, Kanpur, Uttar Pradesh - 208001	42	R R Synthetics & Finvest Pvt Ltd 1, R. Mukherjee Road 5th Floor Room No. 32B, Kolkata, West Bengal - 700001
43	Vibgyor Financial Service Pvt. Ltd Om Tower, 32 J L Nehru Road, 4th Floor, Kolkata, West Bengal - 700071	44	Jeetendra Kumar Agnihotri 67/117 Canal Road Kanpur, Uttar Pradesh - 208001	45	Maya Gupta 53/7 Naya Ganj, Kanpur, Uttar Pradesh - 208001
46	Parag Bhargava 59/48 Birhana Road, Kanpur, Uttar Pradesh - 208001	47	Ravina Exports Private Limited Room No 302, Vaishno Chambers, 3rd Floor, , 6 Brabourne Road, Near Regional Passport Office, Kolkata, West Bengal - 700001	48	Sanjay Kumar Gupta 128 / 577 K Block Kidwai Nagar, Kanpur, Uttar Pradesh - 208011
49	Vardhaman Textile Company Private Limited 1, R.N. Mukherjee Road 5th Floor Room No. 32b, Kolkata, West Bengal, 700001	50	Manish Verma S/o PC Verma, 127/504, Juhi, Baradevi, S-Block, Kanpur, Uttar Pradesh - 208014	51	Aman Portfolio Pvt. Ltd I E/15 Jhandewalan Extention, New Delhi 110055



अनुवर्ती :
Continuation :

**भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India**

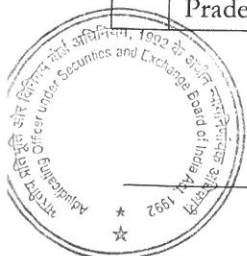
52	Vinod Kumar Dhingra 34A, Dera Mandi Road, Mandi Village, Mehrauli, New Delhi - 110047	53	Ahmad Sadat Hashmi Manzil, 124, Lajpat Nagar, Moradabad, Uttar Pradesh, 244001	54	Sdl Commodities Limited 12/36/136 Gwaltoli, Kanpur, Uttar Pradesh, 208001
55	Cityon Nano Technology Pvt Ltd 15/33 Ram Asrey Nagar Govind Nagar, Kanpur, Uttar Pradesh, 208006	56	Ram Pher Dwivedi 117/q/488 Sharda Nagar Kanpur, Uttar Pradesh, 208024	57	Mohammad Anwar 124, lajpat Nagar, Moradabad, Uttar Pradesh, 244001
58	Daddu Prasad (Huf) 7 Gautam Palli Mantri Awas Lucknow Uttar Pradesh, 226001 And 97 Pahi C S J M Nagar, Chitrakut, Uttar Pradesh, 208024	59	Piyush Jain HUF 128/1285, Y Block Kidwai Nagar, Kanpur, Uttar Pradesh, 208011	60	Sanjay Gupta 7/40-A, Flat no. 302, Anand Pragati, Tilak Nagar, Kanpur - 208002
61	Anand Kumar Chaurasia 28/114, Pheel Khana, Kanpur, Uttar Pradesh, 208001.	62	Surya Bhan Singh-Huf 71/72 Sutarkhana, Kanpur, Uttar Pradesh, 208001	63	Savita Devi Shiv Angan, Lalpur Chowk Hazaribagh, Ranchi, Jharkhand, 834001
64	Ramdas Agarwal (Huf) B-9 Surajpole Gate, Jaipur, Rajasthan, India, 302002	65	Sapna Devi Plot No. 10a Malik Puram Barra-3, Kanpur, Uttar Pradesh, 208022	66	Sagar Net Mart P Ltd 17/11 The Mall, Kanpur, Uttar Pradesh, 208001
67	Arun Kumar D 151 East Of Kailash New Delhi, 110065	68	Sanjay Kumar D 151 East Of Kailash, New Delhi, 11006	69	Dilip Kumar Agrawal L 287 Bahadur Ganj, Allahabad, Uttar Pradesh, 211003
70	Aman Dhingra 34A, Dera Mandi Road, Mandi Village, Mehrauli, New Delhi - 110047	71	Renu Dhingra 34A, Dera Mandi Road, Mandi Village, Mehrauli, New Delhi - 110047	72	Manish Agarwal 51/56, Sita Ram Market, Shakkar Pati, Kanpur, Uttar Pradesh - 208001
73	Kamal Kishor Chaurasia 6/3, East Patel Nagar, New Delhi, Delhi, 110008	74	Pankaj Kumar Gupta 28/114, Pheel Khana, Kanpur, Uttar Pradesh, 208001	75	Renu Agarwal 2A/220, Azad Nagar, Near Zoo, Nawabganj, Kanpur, Uttar Pradesh - 208002
76	Pushap Lata Girotra Flat No. 5, Gautam Apartment Gulmohar Park Road, Delhi, 110049	77	Param Jeet Singh 14, Gurudwara Road Meerapur, Allahabad, Uttar Pradesh, 211003	78	Divya Agarwal 14/75, Gopal Vihar Society, Civil Lines, Kanpur - 208001
79	Bindu Pandey B 1/84-P, Ravindrapuri Extension, Varanasi, Uttar Pradesh - 221005	80	Dev Shankar Pandey B 1/84-P, Ravindrapuri Extension, Varanasi, Uttar Pradesh - 221005	81	Vikas Agarwal Flat no. 302, 4/276, Ratan Residency, Parwati Bangla Road, Swarup Nagar, Kanpur, Uttar Pradesh - 208020



अनुवर्ती :
Continuation :

**भारतीय प्रतिभूति
और विनिमय बोर्ड**
**Securities and Exchange
Board of India**

82	Rita Jain 32/47, Ghumani Bazar, Kanpur, Uttar Pradesh - 208001	83	Dinesh Kumar Soni Cabin No-803, Padam Tower Civil Lines, Kanpur, Uttar Pradesh, India, 208001	84	Siddharth Gupta 53/19, Nayaganj, Kanpur, Uttar Pradesh - 208001
85	Ram Kumar Dubey Wz-47a, Prem Nagar Uttam Nagar, New Delhi, 110035	86	Neelu Agarwal Flat no. 302, 4/276, Ratan Residency, Parwati Bangla Road, Swarup Nagar, Kanpur, Uttar Pradesh - 208020	87	Anjana Jain 128 / 1285, Y Block Kidwai Nagar, Kanpur, Uttar Pradesh 208011
88	Pushpa Jain 128/1285, Y Block, Kidwai Nagar, Kanpur, Uttar Pradesh - 208011	89	Seema Kapoor W/o Sanjay Kapoor 2nd/floor, Rajauri Garden Rajauri Market, West Delhi, New Delhi 110027	90	Neetu Gupta 07/40-A, Flat No 302, Anand Tilak Nagar, Kanpur, Uttar Pradesh, 208002
91	Mahalaxmi Gupta 7/40-A, Flat no. 302, Anand Pragati, Tilak Nagar, Kanpur - 208002	92	Surendra Kumar Agarwal 128/278, H-2 Block, Kidwai Nagar, Kanpur, Uttar Pradesh - 208011	93	Sudeep Goenka 51/40, Nayaganj, Kanpur, Uttar Pradesh - 208001
94	Sapna Agrawal 510 A / 1227 Nehru Nagar Meerapur, Allahabad, Uttar Pradesh, 211003	95	Nikita Dhingra 34/A Dera Mandi Roadb Mandi Village, Mehrauli, New Delhi - 110047	96	Sanjay Kumar Sahu Shivangam Lalpur Chowk Hazaribagh road, Ranchi, Jharkhand, India, 834001
97	Heera Devi Ahirwar Pahi Village, Karwi Tehsil, Chitrakoot, Uttar Pradesh, 210205	98	Amit Kumar 965, Ratan Lal Nagar, Kanpur, Uttar Pradesh, 208022	99	Ruchita Bhargava 59/48 Birhana Road, Kanpur, Uttar Pradesh, 208001
100	Rajendra Kaur 14 Gurudwara Road Meerapur Allahabad Uttar Pradesh, 211003	101	Priyanka Agarwal 128/119a K Block, kidwai Nagar, Kanpur, Uttar Pradesh, 208011	102	Abhishek Goel, 151, 1st floor, Harsh Vihar, Pitampura, Delhi - 110034
103	Preeti Sharma C/o Bodu Ram Sharma Ram Tekri Road Jugsalai, Jamshedpur, Jharkhand, 831006	104	Ram Sukhi 71/72 Suterkhana, Kanpur, Uttar Pradesh, 208001	105	Akansha Goel D/o Anand Prakash Goel, R/0 WZ-468, Sri Nagar, Shakur Basti, Delhi - 110034
106	Jitendra Sharma 129/9 L Block Kidwai Nagar, Kanpur, Uttar Pradesh, 208001	107	Vandana Saini D- 151, East Of Kailash, New Delhi, 110065	108	Lal Ji Sarraf 12/36/136 Gwal toli, Kanpur, Uttar Pradesh, 208001
109	Ravi Karan Kalupur Pahisemahia Charan Pahi Karvi Chitrakoot, Karvi, Uttar Pradesh, 210205				





अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

**Subject: Adjudication Proceedings in the matter of Nikki Global Finance Limited:
Supplementary Notice to be read with the common Show Cause Notice dated August 31,
2017**

1. Securities and Exchange Board of India (hereinafter, referred to as "SEBI") instituted Adjudication Proceedings in the matter of Nikki Global Finance Limited (hereinafter, also referred to as "Company") against 109 (one hundred and nine) entities (hereinafter, combinedly referred to as Noticees) for alleged violation of regulation 3(a),(b),(c),(d) and Regulation 4(1), 4(2)(a),(e) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (hereinafter, referred to as "PFUTP Regulations, 2003"), and appointed undersigned as the Adjudicating Officer under section 19 read with sub-section 15I(1) of the SEBI Act, 1992 and rule 3 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 (hereinafter, referred to as "SEBI Adjudication Rules, 1992") to inquire into and adjudicate upon the alleged violations by the Noticees, and if liable, impose monetary penalty as deem fit in terms of rule 5 of the Adjudication Rules, 1992 and under Section 15HA of the SEBI Act, 1992. *Copy of the communique dated June 22, 2017 appointing Adjudicating Officer in the instant matter is enclosed herewith as Annexure-A.*
2. A show cause Notice dated August 31, 2017 (hereinafter, referred to as "SCN") was issued to Noticees, and they were advised to submit reply within 14 days of receipt of the SCN. Noticees, in their replies inter-alia made request to keep the present adjudication proceedings in abeyance till the parallel proceedings in respect of the Noticees under Section 11 of the SEBI Act for the same cause are concluded.
3. As regards to requests received from Noticees to provide additional information or records in the present matter, it is to be noted that all the relied upon information and supporting records to substantiate the allegations in respect of the Noticees, have already been provided in the SCN and in the instant supplementary Notice, and there is no other information and records being relied upon in the present proceedings other than already provided as stated above.
4. Further, following additional observations in relation to the allegations in respect of the Noticees are being provided herein below:

Last Trade Price (LTP) Analysis - buy trades of connected / identified group during the patch 1:

5. It is noted that 90 out of the 301 connected group entities mentioned in the SCN have traded as buyers during patch 1 i.e, 01/07/2009 to 28/02/2012 of the investigation period i.e, 01/07/2009 to 30/05/2014. Buy LTP analysis of aforesaid 90 entities carried for patch 1 is tabulated below:

Sl.		All trades			LTP > 0 (positive LTP)			LTP < 0 (negative LTP)			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	No of trades	Qty	
1	Santosh Kumar Agarwal	293.55	3545	606322	545.55	594	105820	-252	295	40170	2656	460332	8.31
2	Success Vyapar Private Limited	78.05	1573	344198	151.05	166	30251	-73	96	12479	1311	301468	2.30
3	Priyanshi Securities Limited	67.21	621	164353	93.35	164	38462	-26.14	64	18647	393	107244	1.42
4	Adinath Shares And	62.85	334	177729	71.35	72	36135	-8.50	14	6963	248	134631	1.09



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

Sl.		All trades			LTP > 0 (positive LTP)			LTP < 0 (negative LTP)			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	No of trades	Qty	
	Commodities Private Limited												
5	Anant Fin Consultancy Pvt Ltd	57.65	526	265430	71.75	165	64253	-14.10	23	7884	338	193293	1.09
6	Kamta Prasad Pandey	56.95	1741	286460	339.75	327	50806	-282.80	325	40338	1089	195316	5.17
7	Raj Kumar Agarwal Agarwal	56.50	564	144289	82.10	115	29960	-25.60	42	5214	407	109115	1.25
8	Rishi Kant Awasthi	47.60	513	247168	80.90	131	63446	-33.30	50	10149	332	173573	1.23
9	Surendra Kumar Gupta	46.12	767	220347	96.91	205	55231	-50.79	128	30775	434	134341	1.48
10	Anurag Khandelwal	38.70	226	147715	45.30	85	50519	-6.60	11	7711	130	89485	0.69
11	Rajesh Agarwal	29.80	253	87676	43.40	67	27415	-13.60	19	5298	167	54963	0.66
12	Neil Industries Ltd.	28	520	219484	44.70	89	38010	-16.70	38	15943	393	165531	0.68
13	Kpk Fin Consultancy Private Limited	26.75	398	76313	40.95	63	13331	-14.20	20	3105	315	59877	0.62
14	Umesh Kumar Agarwal	25.05	183	12745	32.95	24	2026	-7.90	12	440	147	10279	0.50
15	Shubhang Exports Ltd	24	260	116572	29.05	56	25293	-5.05	15	8949	189	82330	0.44
16	Ankit Jain	22.20	196	74576	26.60	42	13690	-4.40	11	4253	143	56633	0.41
17	Kavita Awasthi	21.80	272	88407	29.85	64	20116	-8.05	36	7732	172	60559	0.45
18	Rich Udyog Network Limited	21.65	91	13464	27.10	23	2660	-5.45	6	1509	62	9295	0.41
19	Manoj Kumar Agarwal	19.35	118	19242	31.90	19	1580	-12.55	6	626	93	17036	0.49
20	Sanjai Jain Huf	17.75	262	41137	22.20	26	5526	-4.45	8	1589	228	34022	0.34
21	Sanjay Jain	16.80	420	90865	53.05	56	7859	-36.25	48	4167	316	78839	0.81
22	Rajendra Kumar Gupta	14.30	102	16111	22.25	17	1661	-7.95	15	1225	70	13225	0.34
23	Dheeraj Agarwal	11.35	200	101546	19.15	42	12832	-7.80	11	4911	147	83803	0.29
24	Sagar Net Mart P Ltd	10.30	70	51000	10.75	21	15650	-0.45	2	900	47	34450	0.16
25	Som Prakash Goenka	7.60	287	122846	14.10	42	12742	-6.50	10	3345	235	106759	0.22
26	Raghuvansh Agrofarm Ltd.	7.55	63	11095	9.30	9	253	-1.75	3	155	51	10687	0.14
27	Sonali Agarwal	6.40	171	100200	9.50	33	16665	-3.10	12	5200	126	78335	0.15
28	Scope Vyapar Pvt Ltd	5.25	101	39500	6.75	16	4456	-1.50	2	1041	83	34003	0.10
29	Taurus Data Links Pvt Ltd	4.90	80	19940	5.90	19	4061	-1	4	800	57	15079	0.09
30	Manoj Agarwal	4.55	110	9965	26.75	13	1485	-22.20	10	430	87	8050	0.41
31	Maya Gupta	4.50	33	21850	4.55	6	4816	-0.05	1	200	26	16834	0.07
32	Varsha Maheshwari	3.55	21	11145	3.55	8	3430	0	0	0	13	7715	0.05
33	Shreesh Agrawal	3.30	63	12370	7.50	8	1643	-4.20	6	1819	49	8908	0.11
34	Manish Agarwal	3.10	42	21865	3.75	13	7073	-0.65	5	1165	24	13627	0.06
35	Parag Bhargava	2.75	19	3538	3.75	3	650	-1	1	75	15	2813	0.06
36	Jeetendra Kumar Agnihotri	2.20	36	15800	3.70	2	1950	-1.50	2	700	32	13150	0.06
37	Samtal Financial System Limited	2.15	59	13000	4.85	15	3922	-2.70	5	1070	39	8008	0.07
38	Deepak Sehgal	1.90	54	17500	2.25	5	4937	-0.35	2	1999	47	10564	0.03
39	Sdl Commodities Limited	1.83	38	28650	2.95	4	3500	-1.12	6	3631	28	21519	0.05
40	Narendra Kumar Jain	1.75	19	19000	3.10	11	11700	-1.35	3	4600	5	2700	0.05



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

Sl.		All trades			LTP > 0 (positive LTP)			LTP < 0 (negative LTP)			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	No of trades	Qty	
41	Ravina Exports Private Limited	1.60	5	6400	1.60	2	2890	0	0	0	3	3510	0.02
42	Anuradha Anuradha	1.15	29	21117	2.40	7	3488	-1.25	5	4900	17	12729	0.04
43	Mahalaxmi Gupta	1.15	11	8630	1.50	2	2	-0.35	6	6592	3	2036	0.02
44	Rajni Gupta	1	144	71752	3.40	22	11855	-2.40	20	11610	102	48287	0.05
45	Praveen Kumar Agnihotri	0.90	32	10150	1.65	7	3062	-0.75	3	90	22	6998	0.03
46	Manish Verma Verma	0.80	3	300	0.80	2	200	0	0	0	1	100	0.01
47	R R Synthetics & Finvest Private Limited	0.80	8	9000	0.80	5	3750	0	0	0	3	5250	0.01
48	Vardhaman Textile Company Private Limited	0.75	2	3000	0.75	2	3000	0	0	0	0	0	0.01
49	Sanmukh Vincom Private Limited	0.55	20	30000	0.55	9	13546	0	0	0	11	16454	0.01
50	Subodh Agarwal	0.45	63	43310	1.70	16	13232	-1.25	6	9650	41	20428	0.03
51	Madhu Rani Goenka	0.40	98	68800	1.65	17	11356	-1.25	8	5085	73	52359	0.03
52	Sapna Gupta	0.25	74	13410	0.25	1	500	0	0	0	73	12910	0.00
53	Vibgyor Financial Service Pvt Ltd	0.25	15	22000	0.40	8	11530	-0.15	1	2000	6	8470	0.01
54	Dinesh Chand Goel Huf	0.20	7	3000	0.20	3	650	0	0	0	4	2350	0.00
55	Neharika Gupta	0.16	215	101548	6.41	31	12960	-6.25	18	7637	166	80951	0.10
56	Sanjay Gupta	0.15	9	8650	0.25	1	2000	-0.10	1	1	7	6649	0.00
57	Surya Bhan Singh-Huf	0.10	4	300	0.10	1	10	0	0	0	3	290	0.00
58	Meeta Agrawal	0.05	11	2000	0.10	1	100	-0.05	1	110	9	1790	0.00
59	Sanjay Kumar Gupta	0.05	17	2800	0.10	1	500	-0.05	1	150	15	2150	0.00
60	Ashesh Agarwal	0	2	20	0	0	0	0	0	0	2	20	0.00
61	Meenakshi Gupta	0	9	2500	0	0	0	0	0	0	9	2500	0.00
62	Pankaj Kumar Gupta	0	18	4645	0	0	0	0	0	0	18	4645	0.00
63	Rakesh Totuka	0	3	700	0	0	0	0	0	0	3	700	0.00
64	Sanjay Kumar Shreshth E Systems Private Limited	0	1	1000	0	0	0	0	0	0	1	1000	0.00
65	Upinder Singh	0	21	7850	0.30	3	1000	-0.30	1	1500	17	5350	0.01
66	Vasundhara Capital And Securities Limited	0	12	900	0	0	0	0	0	0	12	900	0.00
67	Bindu Pandey	0	3	298	0	0	0	0	0	0	3	298	0.00
68	Sudeep Goenka	0	26	15860	0.20	2	2300	-0.20	4	660	20	12900	0.00
69	Subodh Agarwal Huf	-0.05	235	96098	18.15	46	13304	-18.20	32	12892	157	69902	0.28
70	Divya Agarwal	-0.10	8	3000	0.40	1	400	-0.50	1	100	6	2500	0.01
71	Cityon Nano Technology Private Limited	-0.10	1	135	0	0	0	-0.10	1	135	0	0	0.00
72	Neetu Gupta	-0.15	36	15900	0.60	2	1000	-0.75	4	3599	30	11301	0.01
73	Kirti Stocks & Securities Limited	-0.15	6	10800	0	0	0	-0.15	1	2447	5	8353	0.00
74	Jitendra Sharma	-0.20	14	14000	0.40	7	9260	-0.60	2	35	5	4705	0.01
75	Dev Shankar Pandey	-0.50	20	8000	0	0	0	-0.50	2	1333	18	6667	0.00
76		-0.60	29	25382	0.05	1	500	-0.65	1	500	27	24382	0.00



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

Sl.		All trades			LTP > 0 (positive LTP)			LTP < 0 (negative LTP)			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	Sum of LTP diff	No of trade s	Qty	No of trades	Qty	
77	Vandana Saini	-0.70	7	685	0.25	3	600	-0.95	2	35	2	50	0.00
78	Dinesh Kumar Soni	-0.80	16	18000	0	0	0	-0.80	3	3900	13	14100	0.00
79	Pawan Agarwal	-0.80	27	9910	0.75	4	2750	-1.55	5	1900	18	5260	0.01
80	Renu Agarwal	-1.30	196	95159	5.75	32	21306	-7.05	12	8849	152	65004	0.09
81	Amit Kumar	-1.40	30	8858	0.20	2	151	-1.60	1	100	27	8607	0.00
82	Arun Kumar	-1.75	45	6550	0	0	0	-1.75	2	400	43	6150	0.00
83	Santosh Kumar Agarwal Huf	-2.75	11	3895	0.75	1	100	-3.50	5	2110	5	1685	0.01
84	Manish Agarwal	-3.15	6	2350	0	0	0	-3.15	4	1500	2	850	0.00
85	Siddharth Gupta	-3.30	102	16200	0	0	0	-3.30	3	700	99	15500	0.00
86	Sanjay Kumar Sahu	-3.40	13	6933	0.50	1	2500	-3.90	6	1123	6	3310	0.01
87	Bansal Suppliers Private Ltd.	-5.40	86	27900	3.90	6	2950	-9.30	13	6600	67	18350	0.06
88	Ruchita Bhargava	-11.85	123	39708	10.45	18	6775	-22.30	30	6519	75	26414	0.16
89	Rita Jain	-40.90	3614	538006	519.05	477	73831	-559.95	599	57898	2538	406277	7.90
90	Surendra Kumar Agarwal	-244.15	614	43658	62.70	99	5566	-306.85	168	21222	347	16870	0.95
Group Total		844.82	21052	553248 0	2773.17	3683	1034739	-1928.35	2339	451089	15030	4046652	42.23
Overall Market		326.15	4529 7	1072649 3	6569.20	8412	2258593	6243.05	7322	1087650	29563	7380250	100

6. From the above table, it has been observed that entities from Sr. No. 1 to 59 contributed to net +ve LTP, entities from Sr. No. 60 to 68 contributed to net 0 LTP and entities from Sr. No. 69 to 90 contributed to net -ve LTP. The group entities contributed Rs. 2773.17 (42.23% of the market +ve LTP) to the market +ve LTP. It was also observed that the net LTP contribution by entities from Sr. No. 1 to 59 was Rs. 1168.32 whereas the net LTP contribution of the market was Rs. 326.15. Hence, the entities from Sr. No. 1 to 59 have contributed positively to net LTP significantly.

Benefits derived by the Directors/Promoters/Manipulators:

7. It is also noted that 16 entities alleged to have indulge in price manipulation, were benefitted from the price rise as they were net sellers in shares of Nikki Global Finance Ltd during the investigation period with their net sell value more than Rs. 50 lakh. Details in this regard are as follows:

Sl.	Name	Buy Qty.	Buy Value	Sell Qty.	Sell Value	Net Sell Value
Promoters						
1	Anand Kumar Chaurasia	-	-	292786	234539805.30	234539805.30
2	Kamal Kishor Chaurasia	-	-	90502	73209336.40	73209336.40
Other entities						
3	Surendra Kumar Gupta	259834	15257238.86	351536	58514574.25	43257335.39
4	Neharika Gupta	138898	9903872.90	157153	38844534.55	28940661.65
5	Manish Agarwal	31075	3695360.35	31075	24929675.70	21234315.35
6	Sanjay Kumar Sahu	6933	129510.50	71933	16324384.70	16194874.20
7	Som Prakash Goenka	158196	13862455.10	123796	29422742.95	15560287.85
8	Maya Gupta	58682	8371016.10	41982	23896325.65	15525309.55
9	Savita Devi	-	-	90000	13602655.95	13602655.95
10	Rajendra Kumar Gupta	50824	8008147.70	34024	20697060.70	12688913.00



अनुवर्ती :
Continuation :

**भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India**

11	Divya Agarwal	135	26716.50	55135	10053140.50	10026424.00
12	Rajni Gupta	89352	7584103.65	71427	16534568.50	8950464.85
13	Madhu Rani Goenka	89900	7959196.10	68800	16462904.50	8503708.40
14	Seema Kapoor	1500	291000.00	33500	7518836.65	7227836.65
15	Anuradha	21117	498739.20	36117	7064373.15	6565633.95
16	Vikas Agarwal	-	-	26656	5559369.35	5559369.35

8. The basis of connection for the aforesaid 16 entities is as follows, while the documents relied for the said connection viz, KYC documents, MCA documents, etc, are provided in Annexure 4 of the SCN:

Sl.	Name	Basis of Connection
1	Anand Kumar Chaurasia	Promoters of NGFL as per BSE website
2	Kamal Kishor Chaurasia	
3	Surendra Kumar Gupta	1. Surendra Kumar Gupta, Rajni Gupta and Som Prakash Goenka have same address 2. Som Prakash Goenka and Madhu Rani Goenka have same number 3. Madhu Rani Goenka and Anant Fin Consultancy Pvt Ltd and have same email id 4. Rishi Kant Awasthi is a common director of Anant Fin Consultancy Pvt Ltd and Success Vyapar Private Limited 5. Subodh Agarwal (director of NGFL) and Success Vyapar Private Limited have same address
4	Madhu Rani Goenka	
5	Som Prakash Goenka	
6	Rajni Gupta	
7	Neharika Gupta	
8	Manish Agarwal	1. Manish Agarwal and Manoj Agarwal have same number 2. Manoj Agarwal has an off market transfer with Flabby Traders Private Limited who has an off market transfer with Divya Agarwal 3. Divya Agarwal has an off market transfer with Vasundhara Capital and Securities Ltd. where Subodh Agarwal was a director and Subodh Agarwal is a director of Nikki Global Finance Ltd.
9	Divya Agarwal	
10	Sanjay Kumar Sahu	1. Sanjay Kumar Sahu, Anuradha and Savita Devi have off market transfers with Adinath Shares and Commodities Private Limited 2. Anant Fin Consultancy Pvt Ltd and Adinath Shares And Commodities Private Limited have a common director Ankit Jain 3. Rishi Kant Awasthi is a common director of Anant Fin Consultancy Pvt Ltd and Success Vyapar Private Limited 4. Subodh Agarwal (director of NGFL) and Success Vyapar Private Limited have same address
11	Anuradha	
12	Savita Devi	
13	Maya Gupta	1. Maya Gupta, Rajendra Kumar Gupta and Manish Agarwal have same address 2. Manish Agarwal and Sapna Gupta have same number 3. Sapna Gupta has an off market transfer with Adinath Shares and Commodities Private Limited 4. Anant Fin Consultancy Pvt Ltd and Adinath Shares And Commodities Private Limited have a common director Ankit Jain 5. Rishi Kant Awasthi is a common director of Anant Fin Consultancy Pvt Ltd and Success Vyapar Private Limited 6. Subodh Agarwal (director of NGFL) and Success Vyapar Private Limited have same address
14	Rajendra Kumar Gupta	
15	Seema Kapoor	1. Seema Kapoor has an off market transfer with Success Vyapar Private Limited 2. Rishi Kant Awasthi is a common director of Anant Fin Consultancy Pvt Ltd and Success Vyapar Private Limited 3. Subodh Agarwal (director of NGFL) and Success Vyapar Private Limited have same address
16	Vikas Agarwal	1. Vikas Agarwal HUF and Vikas Agarwal have same address 2. Vikas Agarwal HUF has an off market transfer with Raj Kumar Agarwal 3. Raj Kumar Agarwal and Subodh Agarwal (director of NGFL) have same address

Instant supplementary notice shall be read with the SCN dated August 31, 2017 and covers the additional relied upon information which could not be provided to Noticees in the aforesaid SCN. Allegations in respect of the Noticees remains the same as mentioned in the SCN, wherein



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

109 Noticees have been alleged to have manipulated the price of the scrip of Nikki Global Finance Ltd during patch 1 of the investigation period, and thereby, allegedly violated Regulation 3(a),(b),(c),(d) and Regulation 4(1), 4(2)(a), (e) of PFUTP Regulations, 2003.

10. Noticees which have so far not submitted any reply, are hereby advised to submit their reply within 14 days of receipt of this supplementary notice. Further, Noticees which have submitted their reply to the SCN in past, are hereby advised to make additional submissions, if any they wish to make, within 14 days of receipt of this notice. It is to be noted that upon failure to submit reply to the SCN read with instant supplementary Notice, it shall be presumed that noticees have no reply or no further reply (as the case be) to submit, and accordingly the present matter shall be further proceeded with on the basis of material available on record in terms of sub-rule (7) of Rule (4) of the SEBI Adjudication Rules, 1995. Noticees may also indicate in their respective reply whether they require a personal hearing in the matter.
11. As per the records, Noticees to which SCN could not be delivered, copy of the common SCN dated August 31, 2017 is being provided with this supplementary Notice.
12. For all correspondences under present proceedings, Noticees are advised to quote in their replies subject as "adjudication proceedings instituted by SEBI in the matter of Nikki Global Finance Ltd", and also correspondence of Noticees should invariably be addressed to Enquiry and Adjudication Department-3, SEBI so to ensure appropriate receipt of reply at SEBI. This Office shall not be responsible for any late receipt of your correspondence if not addressed to this office specifically.
13. In addition to physical reply, word copy of your reply be sent via e-mail at ead-3@sebi.gov.in. Noticees are also advised to submit a photocopy of their PAN card and update their correspondence address, emails ids, phone numbers, fax numbers, etc, so as to have a clear line of communication until the conclusion of these proceedings.


Jeevan Sonparote
Adjudicating Officer



~~Annexure:~~