
From: GEETHA G
Sent: 11/08/2022 10:55 AM
To: parispatel2000@yahoo.co.in
Cc: BALBIR SINGH; ARNAVAAZ PRINTER
Subject: ISO SCN - DAKSHA KIRIT PATEL-PAN: ABBPP2992C
Attachments: Annexure 1- Relevant portion of Investigation Report.pdf; Annexure 2- AO
Communique & list of entities.pdf; Annexure 5.PDF; ANNEX 3 - ABBPP2992C.xlsx;
ANNEX 4 - ABBPP2992C.xlsx
Signed By: geethag@sebi.gov.in
Importance: High

DAKSHA KIRIT PATEL

PAN: ABBPP2992C

25,KADAMB, PATEL SOCIETY, GULBAI TEKRA,
ELLISBRIDGE,

AHMEDABAD- GUJARAT -380009

Email Address: parispatel2000@yahoo.co.in

Show Cause Notice under Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 in the matter of dealings in Illiquid Stock Options (ISO) at BSE

PART - A

1. Securities and Exchange Board of India (SEBI) has initiated Adjudication Proceedings against you (Noticee), under SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (Adjudication Rules) for allegedly violating Regulations 3(a),(b),(c),(d) and 4(1), 4(2)(a) of SEBI (Prohibition of Fraudulent and Unfair Trading Practices relating to Securities Markets) Regulations, 2003 (PFUTP Regulations), in the matter of trading in illiquid stock options at Bombay Stock Exchange Ltd. (BSE).
2. SEBI had conducted an investigation into large scale reversal of trades in Stock Options segment of the BSE during the period of April 01, 2014 to September 30, 2015 (Copy of relevant portion of Investigation Report is placed at Annexure 1).
3. Pursuant to investigation, it was observed that during the investigation period, there were trades executed in BSE Stock Options Segment involving reversal of buy and sell positions by clients and counterparties in the same contract (refer Paragraph 6 of Investigation

Report/**Annexure 1**). The reversal trades involved squaring off trades (either buy or sell), with significant difference in the price. You are one among the entities who indulged in reversal trades, which allegedly created false and misleading appearance of trading thereby generated artificial volumes in the Stock Options Segment of BSE during the investigation period. The trades entered in the unique contracts were reversed on the same day with same counterparties, at a price difference which had no underlying basis and without an intention of performing it or there being a change of ownership/rights in the contracts. These factors indicate that these trades were allegedly artificial and non- genuine in nature.

4. In this connection, the undersigned was appointed as Adjudicating Officer under Section 15-I of the Securities and Exchange Board of India Act, 1992 (**SEBI Act**) to inquire into and adjudge the alleged violations by the Noticee and determine whether penalty under Section 15HA of the SEBI Act is liable to be imposed. Copy of communication appointing undersigned as Adjudicating Officer is placed at **Annexure 2**.
5. All the entities identified by the investigation including you, indulged in reversal trades. Your trade details including the trade dates, name of the counterparties, time, price and volume are available in columns **B, E/G, M, P** and **Z** respectively of the Reversal Trade Data placed at **Annexure 3**. Additionally, a summary of your reversal trades in the Stock Options contracts executed during the investigation period is placed at **Annexure 4**.
6. In view of the above, it is alleged that the Noticee herein, by indulging in execution of non-genuine reversal trades in Stock Options, created false and misleading appearance of trading in securities market and thereby, violated provisions of Regulation 3(a),(b),(c),(d), 4(1), 4(2)(a) of PFUTP Regulations.
7. The aforesaid alleged violations, if established, make the Noticee liable for monetary penalty under section 15HA of the SEBI Act, which reads as below:

“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.”

(Emphasis Supplied)

8. Meanwhile, SEBI has framed the SEBI Settlement Scheme, 2022 pursuant to the Order dated May 13, 2022 passed by the Hon'ble Securities Appellate Tribunal (**Annexure 5**), wherein the following directions were issued to SEBI:

“17. We are, thus, of the opinion that SEBI should reconsider and seriously give a thought in coming out with a fresh scheme under Clause 26 of the Settlement Regulations, 2018. Such scheme can be a onetime scheme for this class of person. The terms of settlement should be attractive so that it could attract the noticees / entities to come forward and settle the matter which will ameliorate the harassment of penalty proceedings to the noticees and at the same time would help to clear the backlog of these pending matters before various AOs.” (Emphasis Supplied)

9. In compliance with the above directions of the Hon'ble Securities Appellate Tribunal, SEBI has introduced a onetime settlement scheme called the SEBI Settlement Scheme, 2022, in terms of Regulation 26 of the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018 in the matter of Illiquid Stock Options. The said scheme proposes payment of Settlement Amount as per the details given below:

S No	Number of Contracts*	Settlement Amount (Rs.)
1	1-5	1,00,000/-
2	6-50	2,00,000/-
3	51 and above	5,00,000/- base amount + 10,000 per contract

* You may refer to the relevant Annexure/table of the SCN which contains a summary of the contracts you entered to determine the applicable slab for settlement.

10. The period of the **SEBI Settlement Scheme, 2022** will commence on August 22, 2022 and will close on November 21, 2022, so as to provide an opportunity for settlement to the entities who have executed reversal trades in the stock options segment of BSE during the period April 01, 2014 to September 30, 2015, against whom enforcement proceedings have been initiated and are pending. In case you wish to avail the benefit of the said Scheme, you may access the details of the said Scheme, which would be available on the website of SEBI i.e. www.sebi.gov.in, during the said period.
11. Necessary application for settlement may be filed within the validity period of the scheme and payment of the settlement amount shall be made online. Additionally, for any clarification in

regard to settlement scheme, you may refer to the FAQs at SEBI website or send email to scheme2022@sebi.gov.in.

12. In case you do not wish to avail of the facility under the SEBI Settlement Scheme, 2022, the adjudication proceedings in respect of the allegations contained in Part A of the SCN shall resume. Accordingly, an inquiry shall be held against you in terms of Adjudication Rules read with section 15-I of the SEBI Act, and penalty, if any, shall be imposed under section 15HA of the SEBI Act. In such case, you are called upon to file your reply within 30 days of receipt of this Show Cause Notice.

GEETHA G.

ADJUDICATING OFFICER

- Enclosures:
- 1) Annexure 1 - Relevant Extract of Investigation Report
 - 2) Annexure 2 - Copy of the communication appointing the Adjudicating Officer
 - 3) Annexure 3 - Details of all the reversal trades of the Noticee
 - 4) Annexure 4 - Summary of reversal trades of the Noticee
 - 5) Annexure 5 - Copy of SAT judgment dated May 13, 2022

sno	TRADE_DATE	SCRIPCODE	clnt_pan	clnt_name	cp_pan	cp_name
228122	15/06/2015	845663	AAACL4431F	LEND LEASE COMPANY INDIA LIMITED	ABPP2992C	DAKSHA KIRIT PATEL
228123	15/06/2015	845663	ABPP2992C	DAKSHA KIRIT PATEL	AAACL4431F	LEND LEASE COMPANY INDIA LIMITED
230833	17/06/2015	839649	ABPP2992C	DAKSHA KIRIT PATEL	AABCN0541M	N M IMPEX PRIVATE LIMITED
230839	17/06/2015	839649	AABCN0541M	N M IMPEX PRIVATE LIMITED	ABPP2992C	DAKSHA KIRIT PATEL
254297	03/07/2015	854242	AAAHJ9738A	JAISWAL ISHWRLAL DAYALAL HUF	ABPP2992C	DAKSHA KIRIT PATEL
254298	03/07/2015	854242	AAAHJ9738A	JAISWAL ISHWRLAL DAYALAL HUF	ABPP2992C	DAKSHA KIRIT PATEL
254299	03/07/2015	854242	AAAHJ9738A	JAISWAL ISHWRLAL DAYALAL HUF	ABPP2992C	DAKSHA KIRIT PATEL
254300	03/07/2015	854242	ABPP2992C	DAKSHA KIRIT PATEL	AAAHJ9738A	JAISWAL ISHWRLAL DAYALAL HUF
277654	21/07/2015	836672	ABPP2992C	DAKSHA KIRIT PATEL	AAFCM0698E	CHELSEA BLOCKS AND PIPES PRIVATE LIMITED
277655	21/07/2015	836672	AAFCM0698E	CHELSEA BLOCKS AND PIPES PRIVATE LIMITED	ABPP2992C	DAKSHA KIRIT PATEL
279025	22/07/2015	848791	AALTS7636R	SAMVED BENEFICIARY TRUST	ABPP2992C	DAKSHA KIRIT PATEL
279026	22/07/2015	848791	ABPP2992C	DAKSHA KIRIT PATEL	AALTS7636R	SAMVED BENEFICIARY TRUST
279027	22/07/2015	848791	ABPP2992C	DAKSHA KIRIT PATEL	AALTS7636R	SAMVED BENEFICIARY TRUST
279028	22/07/2015	848791	ABPP2992C	DAKSHA KIRIT PATEL	AALTS7636R	SAMVED BENEFICIARY TRUST
279135	22/07/2015	852753	ABPP2992C	DAKSHA KIRIT PATEL	AAEHG3506M	GAUTAM RAICHAND THAKKAR HUF
279136	22/07/2015	852753	AAEHG3506M	GAUTAM RAICHAND THAKKAR HUF	ABPP2992C	DAKSHA KIRIT PATEL
279137	22/07/2015	852753	ABPP2992C	DAKSHA KIRIT PATEL	AAEHG3506M	GAUTAM RAICHAND THAKKAR HUF

ORDER_NO	CP_ORDER_NO	TRADEID	ORDER_TIME	CP_ORDER_TIME	TRADE_TIME	ORDER_LMTIME	CP_ORDER_LMTIME	TRADE_RATE
1434352206089000000	14343522060890000001	12257	12:40:06.089853	12:40:07.816190	12:40:07.816190	12:40:06.089853	12:40:07.816190	3.6
14343522060890000003	14343522060890000002	13198	12:53:33.117605	12:53:32.525905	12:53:33.117605	12:53:33.117605	12:53:32.525905	10.2
1434513172285003002	1434513172285003008	363	13:12:17.148368	13:12:17.773102	13:12:17.773102	13:12:17.148368	13:12:17.773102	48
1434513172285003016	1434513172285003015	2181	13:48:15.067533	13:48:14.880042	13:48:15.193170	13:48:15.193170	13:48:14.880042	68
1435915543463000006	1435915543463000007	23760	14:56:13.072661	14:56:13.182145	14:56:13.182145	14:56:13.072661	14:56:13.182145	13.85
1435915543463000003	1435915543463000002	24694	14:55:50.166224	14:55:49.978848	14:55:50.166224	14:55:50.166224	14:55:49.978848	20
1435915543463000005	1435915543463000004	24716	14:55:55.666123	14:55:55.385083	14:55:55.666123	14:55:55.666123	14:55:55.385083	17
1435915543463000001	1435915543463000000	26749	14:55:44.072648	14:55:43.463296	14:55:44.072648	14:55:44.072648	14:55:43.463296	22
1437464545977000001	1437464545977000000	41793	13:12:26.705581	13:12:25.977381	13:12:26.705581	13:12:26.705581	13:12:25.977381	18.7
1437464545977000003	1437464545977000002	48340	13:38:49.456016	13:38:49.308602	13:38:49.456016	13:38:49.456016	13:38:49.308602	13.2
1437549585999000000	1437549585999000001	482	12:49:45.999923	12:49:47.624754	12:49:47.624754	12:49:45.999923	12:49:47.624754	9.2
1437549585999000004	1437549585999000005	705	12:50:14.015917	12:50:15.000084	12:50:15.000084	12:50:14.015917	12:50:15.000084	15.8
1437549585999000007	1437549585999000006	755	12:50:59.922316	12:50:59.828187	12:50:59.922316	12:50:59.922316	12:50:59.828187	17.05
1437549585999000002	1437549585999000003	870	12:50:00.812697	12:50:01.109143	12:50:01.109143	12:50:00.812697	12:50:01.109143	12.1
1437549719734000002	1437549719734000003	828	12:52:05.734726	12:52:05.937965	12:52:05.937965	12:52:05.734726	12:52:05.937965	9.1
1437549719734000000	1437549719734000001	832	12:51:59.734697	12:52:00.328882	12:52:00.328882	12:51:59.734697	12:52:00.328882	7.3
1437549719734000005	1437549719734000004	1042	12:52:21.031735	12:52:20.828578	12:52:21.031735	12:52:21.031735	12:52:20.828578	12.1

ORDER_QTY	CP_ORDER_QTY	ORDER_AVLQTY	CP_ORDER_AVLQTY	ORDER_LMQTY	CP_ORDER_LMQTY	MEMBER_NO	MEMBER_NAME
45000	45000	45000	45000	45000	45000	990	THE CALCUTTA STOCK EXCHANGE LTD.
45000	45000	45000	45000	45000	45000	5156	MOUSUMI DEB ROY
10000	124500	10000	124500	10000	124500	5156	MOUSUMI DEB ROY
10000	10000	10000	10000	10000	10000	4029	ODYSSEY SECURITIES PVT. LTD
56000	56000	56000	56000	56000	56000	4029	ODYSSEY SECURITIES PVT. LTD
2000	2000	2000	2000	2000	2000	4029	ODYSSEY SECURITIES PVT. LTD
2000	2000	2000	2000	2000	2000	4029	ODYSSEY SECURITIES PVT. LTD
60000	60000	60000	60000	60000	60000	5156	MOUSUMI DEB ROY
36000	36000	36000	36000	36000	36000	5156	MOUSUMI DEB ROY
36000	36000	36000	36000	36000	36000	6493	ARYAV SECURITIES PVT. LTD.
64000	64000	64000	64000	64000	64000	6588	INDRAKSHI SALES PVT. LTD.
4000	4000	4000	4000	4000	4000	5156	MOUSUMI DEB ROY
56000	56000	56000	56000	56000	56000	5156	MOUSUMI DEB ROY
4000	4000	4000	4000	4000	4000	5156	MOUSUMI DEB ROY
2000	2000	2000	2000	2000	2000	5156	MOUSUMI DEB ROY
62000	62000	62000	62000	62000	62000	6588	INDRAKSHI SALES PVT. LTD.
60000	60000	60000	60000	60000	60000	5156	MOUSUMI DEB ROY

OLD_CLIENT	MODIFIED_CLIENT	CP_MEMBER_NO	CP_MEMBER_NAME	CP_OLD_CLIENT	CP_MODIFIED_CLIENT	TERMINALID
	M1069L001	5156	MOUSUMI DEB ROY		JT98	221
	JT98	990	THE CALCUTTA STOCK EXCHANGE LTD.		M1069L001	902
	JT98	4029	ODYSSEY SECURITIES PVT. LTD		BS00098	902
	BS00098	5156	MOUSUMI DEB ROY		JT98	902
	BS00347	5156	MOUSUMI DEB ROY		JT98	902
	BS00347	5156	MOUSUMI DEB ROY		JT98	902
	BS00347	5156	MOUSUMI DEB ROY		JT98	902
	JT98	4029	ODYSSEY SECURITIES PVT. LTD		BS00347	902
	JT98	6493	ARYAV SECURITIES PVT. LTD.		C592	902
	C592	5156	MOUSUMI DEB ROY		JT98	202
	29	5156	MOUSUMI DEB ROY		JT98	902
	JT98	6588	INDRAKSHI SALES PVT. LTD.		29	902
	JT98	6588	INDRAKSHI SALES PVT. LTD.		29	902
	JT98	6588	INDRAKSHI SALES PVT. LTD.		29	902
	JT98	6588	INDRAKSHI SALES PVT. LTD.		31	902
	31	5156	MOUSUMI DEB ROY		JT98	902
	JT98	6588	INDRAKSHI SALES PVT. LTD.		31	902

USER_NAME	LOCATION_ADDRESS	CP_TERMINALID
VARUN KUMAR CHOUDHURY	7 LYONS RANGE 1ST FLOOR KOLKATA WEST BENGAL 700001	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	221
SUBHENDU SAHA	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
SANJAY BANSAL	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
RAHUL JHUNJHUNWALA	16, INDIA EXCHANGE PLACE KOLKATA WEST BENGAL 700001	902
RAHUL JHUNJHUNWALA	16, INDIA EXCHANGE PLACE KOLKATA WEST BENGAL 700001	902
RAHUL JHUNJHUNWALA	16, INDIA EXCHANGE PLACE KOLKATA WEST BENGAL 700001	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	202
NIDHI JHUNJHUNWALA	UNIT 104, 1ST FLOOR. MERLIN CHAMBERS. 18, BRITISH INDIA STREET KOLKATA WEST BENGAL 700069	902
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	902
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	902

CP_USER_NAME	CP_LOCATION_ADDRESS	ORDER_AUD
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
VARUN KUMAR CHOUDHURY	7 LYONS RANGE 1ST FLOOR KOLKATA WEST BENGAL 700001	A
SANJAY BANSAL	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
SUBHENDU SAHA	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
RAHUL JHUNJHUNWALA	16, INDIA EXCHANGE PLACE KOLKATA WEST BENGAL 700001	A
NIDHI JHUNJHUNWALA	UNIT 104, 1ST FLOOR. MERLIN CHAMBERS. 18, BRITISH INDIA STREET KOLKATA WEST BENGAL 700069	A
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	A
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	A
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	A
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	A
MOUSUMI DEB ROY	8, LYONS RANGE, KOLKATA 700001 KOLKATA WEST BENGAL 700001	A
VINAY JAJODIA	P41, PRINCEP STREET KOLKATA WEST BENGAL 700072	A

CP_ORDER_AUD	ORDER_TYPE	CP_ORDER_TYPE	LOCATIONID	CP_LOCATIONID	SCRIPNAME	EXPIRY	STRIKEPRICE	SERIES	MKT_TYPE
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A	L	L	7000010001002012	7000010001001012	AXIS15JUN620.00PEW3	2015-06-18	62000.0	EQD	N
A	L	L	7000010001001012	7000010001002012	AXIS15JUN620.00PEW3	2015-06-18	62000.0	EQD	N
A	L	L	7000010001002012	7000010001001012	FEDB15JUL170.00PEW2	2015-07-09	17000.0	EQD	N
A	L	L	7000010001002012	7000010001001012	FEDB15JUL170.00PEW2	2015-07-09	17000.0	EQD	N
A	L	L	7000010001002012	7000010001001012	FEDB15JUL170.00PEW2	2015-07-09	17000.0	EQD	N
A	L	L	7000010001002012	7000010001002012	FEDB15JUL170.00PEW2	2015-07-09	17000.0	EQD	N
A	L	L	7000010001001012	7000690001001019	OBNK15JUL160.00CEW4	2015-07-23	16000.0	EQD	N
A	L	L	7000690001001019	7000010001001012	OBNK15JUL160.00CEW4	2015-07-23	16000.0	EQD	N
A	L	L	7000720001002012	7000010001001012	DISH15JUL100.00CEW4	2015-07-23	10000.0	EQD	N
A	L	L	7000010001001012	7000720001002012	DISH15JUL100.00CEW4	2015-07-23	10000.0	EQD	N
A	L	L	7000010001001012	7000720001002012	DISH15JUL100.00CEW4	2015-07-23	10000.0	EQD	N
A	L	L	7000010001001012	7000720001002012	DISH15JUL100.00CEW4	2015-07-23	10000.0	EQD	N
A	L	L	7000010001001012	7000720001002012	EXID15JUL165.00PEW4	2015-07-23	16500.0	EQD	N
A	L	L	7000720001002012	7000010001001012	EXID15JUL165.00PEW4	2015-07-23	16500.0	EQD	N
A	L	L	7000010001001012	7000720001002012	EXID15JUL165.00PEW4	2015-07-23	16500.0	EQD	N

ISIN_NO	qty
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	56000
	2000
	2000
	60000
	36000
	36000
	64000
	4000
	56000
	4000
	2000
	62000
	60000

Annex 24-4

Index	clnt_pan	scripname	buy_quantity	buy_value	avg_buy_rate	sell_qty	sell_value	avg_sell_rate	non_gen_trnx_entity_contract
0	ABPPP2992C	AXIS15JUN620.00PEW3	10000	480000	48	10000	680000	68	2
0	ABPPP2992C	DISH15JUL100.00CEW4	64000	1066400	16.66	64000	588800	9.2	4
0	ABPPP2992C	EXID15JUL165.00PEW4	62000	744200	12	62000	452600	7.3	3
0	ABPPP2992C	FEDB15JUL170.00PEW2	60000	1320000	22	60000	849600	14.16	4
0	ABPPP2992C	HAIL15JUN260.00CEW3	45000	459000	10.2	45000	162000	3.6	2
0	ABPPP2992C	OBNK15JUL160.00CEW4	36000	673200	18.7	36000	475200	13.2	2

total_trd_entity_cntrct	total_no_of_trades_of_the_cntrct	art_vol_gen_entity_in_the_cntrct	total_vol_gen_by_entity_in_the_cntrct
2	25	20000	20000
4	8	128000	128000
3	3	124000	124000
4	4	120000	120000
2	2	90000	90000
2	2	72000	72000

total_vol_in_the_contract	prcnt_of_non_gen_trds_entity_total_trds_in_cntrct_entity	prcnt_of_non_gen_trds_entity_total_trds_in_cntrct
333000	100	8
168000	100	50
124000	100	100
120000	100	100
90000	100	100
72000	100	100

prcnt_of_art_vol_gen_entity_cntct_total_vol_gen_by_entity_in_cntct	prcnt_of_art_vol_gen_entity_cntct_total_vol_in_cntct
100	6.01
100	76.19
100	100
100	100
100	100
100	100
100	100