



भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

ADJUDICATING OFFICER

Enquiries and Adjudication Department

Through Email and SPAD

SEBI/HO/EAD1/SBM/AK/ 563 नं /2022
February 10, 2022

MR. ANIL KUMAR AGARWAL

PAN: AACPA8246L

B28 SUSHANT APARTMENTS SUSHANT LOK,
BLOCK C GURGAON, NEAR M G METRO STATION,
GURGAON HARYANA 122002

Email: ANIL3558@YAHOO.COM

Notice under Rule 4(1) of Securities and Exchange Board of India (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995

1. Securities and Exchange Board of India (hereinafter referred to as 'SEBI'), vide communiqué dated July 27, 2021 (Annexure-A), appointed the undersigned as Adjudicating Officer (hereinafter referred to as 'AO') under Section 19 read with Section 15-I(1) of Securities and Exchange Board of India Act, 1992 (hereinafter referred to as 'SEBI Act') read with Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 to inquire into and adjudge under the provisions of Section 15HA of the SEBI Act, the violation of the relevant provisions of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices related to Securities Market) Regulations, 2003 (hereinafter referred to as 'PFUTP Regulations'), alleged to have been committed by Mr. Anil Kumar Agarwal (hereinafter referred to as 'Noticee') by carrying out non-genuine trades in illiquid stock options at Bombay Stock Exchange (BSE).
2. SEBI observed large scale reversal of trades in Stock Options segment of BSE leading to creation of artificial volume. Pursuant to the same, SEBI conducted an investigation

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सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बान्द्रा कुर्ला कॉम्प्लेक्स, बान्द्रा (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

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



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into the trading activities of certain entities in illiquid Stock Options at BSE for the period April 01, 2014 to September 30, 2015 (hereinafter referred to as '**Investigation Period**'/'**relevant period**').

3. It may be noted that reversal trades are considered non-genuine trades if it involves an entity reversing its buy or sell positions in a contract with subsequent sell or buy positions with the same counterparty during the same day. In this regard, artificial volume is considered as the volume (no. of units) reversed in non-genuine trades, comprising both original volume and reversed volume while keeping out the volume which is not reversed.
4. Pursuant to the investigation, it is alleged that, during the investigation period, a total of 2,91,643 trades comprising substantial 81.38% of all the trades executed by various entities in Stock Options Segment of BSE were non-genuine trades. The aforesaid alleged non genuine trades resulted into creation of artificial volume to the tune of 826.21 crore units or 54.68% of the total market volume in Stock Options segment of BSE during the Investigation period.
5. It is further noted that said alleged non-genuine trades were not restricted to any specific contract or between any specific set of entities. It is noted that Noticee was one of the various persons/ entities which were indulged in execution of such alleged non-genuine trades in Stock Options Segment of BSE during the Investigation period. Following points deals with the dealings of Noticee during the Investigation period and allegations against his execution of non-genuine trades.
6. For the purpose of illustration of non-genuine trades and creation of artificial volume by the Noticee, details of trading done by the Noticee in the contract viz. "CRGL15APR155.00CEW2" on March 17, 2015 is given below:



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Date	Buyer	Seller	Buy Order Time	Sell Order Time	Trade Time	Trade Rate (Rs.)	Trade Quantity
17/03/2015	SHRINATHJI COMMODITIES PRIVATE LIMITED	ANIL KUMAR AGARWAL	12:38:28	12:38:28	12:38:28	14.5	20000
17/03/2015	ANIL KUMAR AGARWAL	SHRINATHJI COMMODITIES PRIVATE LIMITED	12:38:34	12:38:34	12:38:34	19.9	20000

7. It is observed from the table above that the trades entered by the Noticee in the contract of "CRGL15APR155.00CEW2" on March 17, 2015, with the counterparty viz Shrinathji Commodities Private Limited were reversed between the Noticee and the same counterparty on the same day resulting in reversal of trades which are, *prima facie*, considered to be as non-genuine. Therefore, in the process, artificial volume in the stock option contract at BSE has been generated by the Noticee through such non-genuine trades. From the table above, it is observed that the artificial volume created as no. of units reversed in non-genuine trades is 40,000 units comprising both volume of initial trade and volume of reversal trade while not considering the volume which is not reversed. In the process, it is observed that the Noticee had made a loss of Rs. 1,08,000.
8. It is further observed from the trade data of the Noticee that he has allegedly entered into non-genuine trades in 3 contracts wherein he executed a total of 6 trades all of which were, *prima facie*, non-genuine trades. In view of this, it is alleged that such fraudulent trades of the Noticee had resulted into creation of artificial volume of total 1,20,000 units.
9. In this regard, details of all the alleged non-genuine trades of the Noticee in Stock Option Segment of BSE during relevant period are attached as **Annexure B**. From the perusal of the trade data of the alleged non-genuine trades of the Noticee, it



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is observed that Noticee has allegedly executed non-genuine trades in 3 contracts. The total volume of 1,20,000 units generated by the Noticee in the said 3 contracts, due to his alleged non-genuine trades artificial volume was generated by the Noticee in the stock option segment of BSE. These alleged non-genuine trades, executed by Noticee in above contracts, had significant differential in buy rates and sell rates considering that the trades were reversed on same day.

10. Further, summary of dealings of Noticee in 3 Stock Options contracts in which he had allegedly executed non genuine trades during the relevant period is enclosed as **Annexure C**. The details of artificial volume generated by the Noticee through the alleged Non- Genuine trades are mentioned in the table below:

S. No.	Contract Name	Avg. Buy Rate (Rs.)	Total Buy Volume (no. of units)	Avg. Sell Rate (Rs.)	Total Sell Volume (no. of units)	% of Non Genuine trades of Noticee in the contract to Noticee's Total trades in the Contract	% of Non Genuine trades of Noticee in the contract to Total trades in the Contract	% of Artificial Volume generated by Noticee in the contract to Noticee's Total Volume in the Contract	% of Artificial Volume generated by Noticee in the contract to Total Volume in the Contract
1	CRGL15APR155.00C EW2	19.9	20000	14.5	20000	100	50	100	44.44
2	CRGL15APR190.00P EW1	19.3	20000	12.3	20000	100	100	100	100
3	INCM15APR110.00P EW1	18.9	20000	11.5	20000	100	33.33	100	33.33



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11. In view of the foregoing, it is alleged that the Noticee, by indulging in execution of reversal trades in Stock Options with same entities on the same day, which were non-genuine in nature, has created false or misleading appearance of trading in the aforementioned contracts traded in the option segment of BSE. In view of the fact that these options contracts were illiquid in nature, having very small volume in trading, the Noticee allegedly created artificial volumes in stock options which was manipulative and deceptive in nature. Therefore, in view of above, it is alleged that the Noticee has violated Regulation 3(a), (b), (c), (d), 4(1) and 4(2)(a) of PFUTP Regulations, 2003. The text of aforementioned provisions of law is being reproduced below:

PFUTP Regulations

3. Prohibition of certain dealings in securities

No person shall directly or indirectly—

- (a) buy, sell or otherwise deal in securities in a fraudulent manner;*
- (b) use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under;*
- (c) employ any device, scheme or artifice to defraud in connection with dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange;*
- (d) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under.*

4. Prohibition of manipulative, fraudulent and unfair trade practices



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- (1) Without prejudice to the provisions of regulation 3, no person shall indulge in a fraudulent or an unfair trade practice in securities.
- (2) Dealing in securities shall be deemed to be a fraudulent or an unfair trade practice if it involves fraud and may include all or any of the following, namely:—
- (a) indulging in an act which creates false or misleading appearance of trading in the securities market;

12. The alleged violation of the aforementioned provisions of the PFUTP Regulations, if proved, makes the Noticee liable for penalty under the provisions of Section 15HA of the SEBI Act. The text of the said provisions is reproduced below:

SEBI Act

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.

13. In view of the above, the Noticee is required to Show Cause as to why an inquiry should not be held against him in terms of Rule 4 of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 read with Section 15 I of the SEBI Act and why penalty, if any, should not be imposed on him under the provisions of Section 15HA of the SEBI Act.
14. Your reply, along with supporting enclosures and documents, should reach the undersigned at the address mentioned below as well as through email at sureshm@sebi.gov.in and avinashk@sebi.gov.in in pdf and MS Word format within 15 (fifteen) days from the date of receipt of this notice, failing which it shall be presumed that you have no submissions to make, in which case, the matter shall be proceeded with on the basis of material/facts on record. You may also



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indicate in your reply if you desire a personal hearing in the matter. You are also required to submit a copy of your PAN Card and your contact details (contact person, phone number, email details, fax etc.) for our records. Further, in case there is any change in your address or contact details during the period of the current Adjudication Proceedings, the same may be brought to the notice of the Adjudicating Officer immediately.

SURESH B. MENON

Enclosures:

Annexure A: Copy of the Appointment Order dated July 27, 2021.

Annexure B: Trade log depicting all non-genuine trades of Noticee in Stock Option segment of BSE during investigation period

Annexure C: Summary of dealings of Noticee in contracts wherein he executed non-genuine trades

Anil Kumar Agarwal

Annexure 1

SECURITIES AND EXCHANGE BOARD OF INDIA

Communication of the Order appointing Adjudicating Officer

1. Whereas, Securities and Exchange Board of India (SEBI) has examined trading in the scrip of Illiquid Stock Options at BSE for possible violation of the provisions of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as the 'SEBI Act') and various rules and regulations made there under.
2. Whereas, the Competent Authority is *prima facie* of the view that there are grounds to adjudicate upon the alleged violations of Regulations 3 (a), (b), (c), (d), and Regulations 4 (1), 4 (2) (a) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003, by the entities mentioned at Annexure A.
3. The Competent Authority has, therefore, in exercise of the powers conferred upon her under Section 19 of the SEBI Act, 1992 ("SEBI Act") read with Section 15-I(1) of the SEBI Act and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 ("hereinafter referred as the 'SEBI Rules') read with Section 19 of the SEBI Act appointed Shri Suresh B. Menon, Chief General Manager, Shri G. Ramar, Chief General Manager, Ms. Maninder Cheema, Chief General Manager, Shri Prasanta Mahapatra, Chief General Manager, Shri Vijayant Kumar Verma, General Manager and Ms. Soma Majumder, General Manager as Adjudicating Officers vide Order dated June 21, 2021 to enquire into and adjudge under Sections 15HA SEBI Act, 1992 for alleged violations by the Noticees as mentioned at Para 2 above. The list of the entities against whom adjudication is approved and the names of the Adjudicating Officers who are appointed to adjudicate against respective entities are listed in Annexure A.
4. The said proceedings of appointment are hereby communicated to the Adjudicating Officers who shall conduct the Adjudication Proceedings in the manner specified under Rule 4 of the of the SEBI Rules read with sub-section (1) and (2) of Section 15 I of SEBI Act. The Adjudicating Officers shall enquire into and adjudicate upon the alleged violation as stated above and if the Adjudicating Officers are satisfied that the entities have become liable to penalty, may impose penalty, as they think fit, in terms of Rule 5 of the SEBI Rules and provisions of Sections 15 HA of the SEBI Act.

Dated at Mumbai, this 27th day of July 2021.



ROBIN JOSEPH BABY
DEPUTY GENERAL MANAGER
SECURITIES AND EXCHANGE BOARD OF INDIA

325	210010453	AAIHA8668L •	ANIL AGRAWAL HUF	TV Bala	Suresh B Menon
326	210016852	ALHPB8927B	ANIL BERCCHA	TV Bala	Suresh B Menon
327	210008302	AADHA5176N •	ANIL GANGWAL HUF	TV Bala	Suresh B Menon
328	210011800	AAOHA5402N •	ANIL JAIN HUF	TV Bala	Suresh B Menon
329	210011158	AALHA3960J	ANIL KUMAR GARG HUF	TV Bala	Suresh B Menon
330	210007944	AACPA8246L	ANIL KUMAR AGARWAL	TV Bala	Suresh B Menon
331	210010721	AAIHA8545D	ANIL KUMAR AGARWAL (HUF)	TV Bala	Suresh B Menon
332	210007624	AACHA4952P •	ANIL KUMAR AGARWAL HUF	TV Bala	Suresh B Menon
333	210009724	AAGHA0848G •	ANIL KUMAR AGARWAL HUF	TV Bala	Suresh B Menon
334	210009312	AAFHA0861E •	ANIL KUMAR AGARWALA AND SONS HUF	TV Bala	Suresh B Menon
335	210010699	AAJHA3294B •	ANIL KUMAR BAGARIA HUF	TV Bala	Suresh B Menon
336	210013078	ABYPC4098B	ANIL KUMAR CHOUDHARY	TV Bala	Suresh B Menon
337	210010136	AAHHA8897C •	ANIL KUMAR CHOUDHURY HUF	TV Bala	Suresh B Menon
338	210007618	AACHA4599N	ANIL KUMAR GADODIA HUF	TV Bala	Suresh B Menon
339	210011794	AAOHA4059D	ANIL KUMAR GOYAL HUF	TV Bala	Suresh B Menon
340	210014081	ADFPG7270C	ANIL KUMAR GUPTA	TV Bala	Suresh B Menon
341	210008291	AADHA1086K	ANIL KUMAR GUPTA AND FAMILY HUF	TV Bala	Suresh B Menon
342	210011600	AANHA4699O	ANIL KUMAR HUF	TV Bala	Suresh B Menon
343	210015550	AFUPJ2708M	ANIL KUMAR JAIN	TV Bala	Suresh B Menon
344	210010104	AAHHA0310A	ANIL KUMAR MEHNDIRATTA HUF	TV Bala	Suresh B Menon

Anil Kumar Agarwal

Annexure 2

sno	98670	98671	99819	99820	99826	99827
TRADE_DATE	17/03/2015	17/03/2015	17/03/2015	17/03/2015	17/03/2015	17/03/2015
SCRIPCODE	844228	844228	871818	871818	873221	873221
clnt_pan	AALCS8578B	AACPA8246L	AACPA8246L	AALCS8578B	AALCS8578B	AACPA8246L
clnt_name	SHRINATHJI COMMODITI ES PRIVATE LIMITED	ANIL KUMAR AGARWAL	ANIL KUMAR AGARWAL	SHRINATHJI COMMODITI ES PRIVATE LIMITED	SHRINATHJI COMMODITI ES PRIVATE LIMITED	ANIL KUMAR AGARWAL
cp_pan	AACPA8246L	AALCS8578B	AALCS8578B	AACPA8246L	AACPA8246L	AALCS8578B
cp_name	ANIL KUMAR AGARWAL	SHRINATHJI COMMODITI ES PRIVATE LIMITED	SHRINATHJI COMMODITI ES PRIVATE LIMITED	ANIL KUMAR AGARWAL	ANIL KUMAR AGARWAL	SHRINATHJI COMMODITI ES PRIVATE LIMITED
ORDER_NO	1426576108 824000001	1426576108 824000002	1426568340 482003002	1426568340 482003001	1426576108 824001001	1426576108 824001002
CP_ORDER_NO	1426576108 824000000	1426576108 824000003	1426568340 482003003	1426568340 482003000	1426576108 824001000	1426576108 824001003
TRADEID	12753	13685	12672	14102	13845	14192
ORDER_TIME	12:38:28.95 7309	12:38:34.52 4640	12:37:29.32 0752	12:37:24.05 1442	12:39:34.06 1291	12:39:40.83 0660
CP_ORDER_TIME	12:38:28.82 4343	12:38:34.65 7708	12:37:29.45 1813	12:37:23.92 0432	12:39:33.93 0284	12:39:40.96 1692
TRADE_TIME	12:38:28.95 7309	12:38:34.65 7708	12:37:29.45 1813	12:37:24.05 1442	12:39:34.06 1291	12:39:40.96 1692
ORDER_LMTIME	12:38:28.95 7309	12:38:34.52 4640	12:37:29.32 0752	12:37:24.05 1442	12:39:34.06 1291	12:39:40.83 0660
CP_ORDER_LMTIME	12:38:28.82 4343	12:38:34.65 7708	12:37:29.45 1813	12:37:23.92 0432	12:39:33.93 0284	12:39:40.96 1692
TRADE_RATE	14.5	19.9	18.9	11.5	12.3	19.3
LTP_RATE		5.4		-7.4		7.0
LTP_PERCENT		37.24		-39.15		56.91
TRADE_VALUE	3390000.0	3498000.0	2578000.0	2430000.0	4046000.0	4186000.0

ORDER_RATE	14.5	19.9	18.9	11.5	12.3	19.3
CP_ORDER_RATE	14.5	19.9	18.9	11.5	12.3	19.3
ORDER_LMRATE	14.5	19.9	18.9	11.5	12.3	19.3
CP_ORDER_LMRATE	14.5	19.9	18.9	11.5	12.3	19.3
ORDER_LTP	14.5	14.5	11.5	11.5	12.3	12.3
CP_ORDER_LTP		19.9	18.9			19.3
TRADED_QTY	20000	20000	20000	20000	20000	20000
ORDER_QTY	20000	20000	20000	20000	20000	20000
CP_ORDER_QTY	20000	20000	20000	20000	20000	20000
ORDER_AVLQTY	20000	20000	20000	20000	20000	20000
CP_ORDER_AVLQTY	20000	20000	20000	20000	20000	20000
ORDER_LMQTY	20000	20000	20000	20000	20000	20000
CP_ORDER_LMQTY	20000	20000	20000	20000	20000	20000
MEMBER_NO	6166	3302	3302	6166	6166	3302
MEMBER_NAME	EXCEL STOCK BROKING PVT.LTD.	ASHLAR SECURITIES PRIVATE LIMITED	ASHLAR SECURITIES PRIVATE LIMITED	EXCEL STOCK BROKING PVT.LTD.	EXCEL STOCK BROKING PVT.LTD.	ASHLAR SECURITIES PRIVATE LIMITED
OLD_CLIENT						
MODIFIED_CLIENT	S0085	NB10	NB10	S0085	S0085	NB10
CP_MEMBER_NO	3302	6166	6166	3302	3302	6166
CP_MEMBER_NAME	ASHLAR SECURITIES PRIVATE LIMITED	EXCEL STOCK BROKING PVT.LTD.	EXCEL STOCK BROKING PVT.LTD.	ASHLAR SECURITIES PRIVATE LIMITED	ASHLAR SECURITIES PRIVATE LIMITED	EXCEL STOCK BROKING PVT.LTD.
CP_OLD_CLIENT						

CP_MODIFIED_CLIENT	NB10	S0085	S0085	NB10	NB10	S0085
TERMINALID	902	902	902	902	902	902
USER_NAME	VIMESH . KAMALIA	RAGHUNATH SINGH	RAGHUNATH SINGH	VIMESH . KAMALIA	VIMESH . KAMALIA	RAGHUNATH SINGH
LOCATION_ADDRESS	21 HEMANT BASU SARANI 309 CENTRE POINT KOLKATA WEST BENGAL 700001	A 38 SECTOR 67 NOIDA NOIDA UTTAR PRADESH 201301	A 38 SECTOR 67 NOIDA NOIDA UTTAR PRADESH 201301	21 HEMANT BASU SARANI 309 CENTRE POINT KOLKATA WEST BENGAL 700001	21 HEMANT BASU SARANI 309 CENTRE POINT KOLKATA WEST BENGAL 700001	A 38 SECTOR 67 NOIDA NOIDA UTTAR PRADESH 201301
CP_TERMINALID	902	902	902	902	902	902
CP_USER_NAME	RAGHUNATH SINGH	VIMESH . KAMALIA	VIMESH . KAMALIA	RAGHUNATH SINGH	RAGHUNATH SINGH	VIMESH . KAMALIA
CP_LOCATION_ADDRESS	A 38 SECTOR 67 NOIDA NOIDA UTTAR PRADESH 201301	21 HEMANT BASU SARANI 309 CENTRE POINT KOLKATA WEST BENGAL 700001	21 HEMANT BASU SARANI 309 CENTRE POINT KOLKATA WEST BENGAL 700001	A 38 SECTOR 67 NOIDA NOIDA UTTAR PRADESH 201301	A 38 SECTOR 67 NOIDA NOIDA UTTAR PRADESH 201301	21 HEMANT BASU SARANI 309 CENTRE POINT KOLKATA WEST BENGAL 700001
ORDER_AUD	A	A	A	A	A	A
CP_ORDER_AUD	A	A	A	A	A	A
ORDER_TYPE	L	L	L	L	L	L
CP_ORDER_TYPE	L	L	L	L	L	L
LOCATIONID	7000010001002012	2013010001021012	2013010001021012	7000010001002012	7000010001002012	2013010001021012
CP_LOCATIONID	2013010001021012	7000010001002012	7000010001002012	2013010001021012	2013010001021012	7000010001002012
SCRIPNAME	CRGL15APR 155.00CEW2	CRGL15APR 155.00CEW2	INCM15APR 110.00PEW1	INCM15APR 110.00PEW1	CRGL15APR 190.00PEW1	CRGL15APR 190.00PEW1

EXPIRY	2015-04-09	2015-04-09	2015-04-01	2015-04-01	2015-04-01	2015-04-01
STRIKEPRICE	15500.0	15500.0	11000.0	11000.0	19000.0	19000.0
SERIES	EQD	EQD	EQD	EQD	EQD	EQD
MKT_TYPE	N	N	N	N	N	N
ISIN_NO						
rqty	20000	20000	20000	20000	20000	20000

Annexe 3

Index	chnt_pan	scripname	buy_quant	buy_value	avg_buy_r	sell_qty	sell_value	avg_sell_r	non_gen	total_trd	total_no	art_vol_g	total_vol	total_vol	prcnt_of	prcnt_of	prcnt_of	prcnt_of
			cty		ate			ate	tmx_entit	entity_co	of_trades	en_entity	gen_by_e	in_the_co	non_gen	non_gen	art_vol_g	art_vol_g
									y_confrct	ntrct	the_c	n_in_the_c	nity_in_i	ntract	trds_entit	trds_entit	en_entity	en_entity
		CRGL15AP																
	AACP824	R155.00C																
0 6L		EW2	20000	398000	19.9	20000	290000	14.5	2	2	4	40000	40000	90000	100	50	100	44.44
	AACP824	R190.00P																
0 6L		EW1	20000	386000	19.3	20000	246000	12.3	2	2	2	40000	40000	40000	100	100	100	100
	AACP824	PR110.00																
0 6L		PEW1	20000	378000	18.9	20000	230000	11.5	2	2	6	40000	40000	120000	100	33.33	100	33.33

