



भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

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ADJUDICATING OFFICER

By Speed Post Ack. Due/Email

EAD-1/SBM/VS/11865/2022

March 22, 2022

ARJUN JAGDISH DUNGARSHI

(PAN NO.: AQOPD9781D)

KARANJULE CHAWL, ROOM NO 03,
MIDC ROAD, NEAR RAM MANDIR KAILASH NAGAR,
AMBERNATH (E), THANE, MAHARASHTRA-421501

Email Id: arjundungarshi@yahoo.in

Sub: Notice under rule 4(1) of SEBI (Procedure for Holding Inquiry and imposing penalties) Rules, 1995 read with Section 15I of SEBI Act, 1992

1. Securities and Exchange Board of India (hereinafter referred to as 'SEBI'), vide communiqué dated September 30, 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 Arjun Jagdish Dungarshi (hereinafter referred to as 'Noticee') by carrying out reversal trades, which were non-genuine trades in the illiquid stock options segment 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 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'). The copy of relevant extract of the investigation report is enclosed as **Annexure-B**.

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बान्द्रा कुर्ला कॉम्प्लेक्स, बान्द्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.बी.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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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 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. It is alleged that 14,720 entities were involved in the execution of non-genuine trade during the above mentioned investigation period and further, it is alleged that the Noticee is among the 14,720 entities who have indulged in the said non-genuine trades during the investigation period. 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-C**.
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. 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. "ONGC15MAR280.00CEW3" on March 17, 2015 is given below:

Date	Buyer	Seller	Buy Order Time	Sell Order Time	Trade Time	Trade Rate (₹)	Trade Quantity
17/03/2015	Sandeep Jain HUF	Arjun Jagdish Dungarshi	11:41:55	11:41:56	11:41:56	22.05	55000
17/03/2015	Arjun Jagdish Dungarshi	Sandeep Jain HUF	12:01:37	12:01:37	12:01:37	33.25	30000
17/03/2015	Arjun Jagdish Dungarshi	Sandeep Jain HUF	12:01:50	12:01:50	12:01:50	33.5	25000



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7. It is observed from the table above that the trades entered by the Noticee in the contract of "ONGC15MAR280.00CEW3" on March 17, 2015, with his counterparty viz. Sandeep Jain HUF 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 1,10,000 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 ₹6,22,250/-.
8. The transactions in a said contract were reversed with the same counterparty indicates a prior meeting of mind with a view to execute the reversal trades at a pre-determined price. Since these trades were done in illiquid option contracts, there was no trading in the said contract and hence, there was no price discovery in the strictest terms. The wide variation in prices of the said contracts, within a short span of time, is a clear indication that there was pre-determination in the prices by the counterparties while executing the trades. Thus, it is observed that Noticee had indulged in reversal trades with his counterparty in the stock options segment of BSE and the same were non-genuine trades.
9. It is further observed from the trade data of the Noticee that it has allegedly entered into non-genuine trades in 4 contracts wherein he had executed a total of 26 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 3,52,000 units.
10. From the perusal of the trade data of the alleged non-genuine trades of the Noticee, it is observed that Noticee has allegedly executed non-genuine trades in 4 contracts. The total volume of 3,52,000 units generated by the Noticee in these 4 contracts due to his alleged non-genuine trades was artificial volume 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.



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11. Further, summary of dealings of Noticee in 4 Stock Options contracts in which he had allegedly executed non genuine trades during the relevant period is enclosed as **Annexure-D**. 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 (₹)	Total Buy Volume (no. of units)	Avg. Sell Rate (₹)	Total Sell Volume (no. of units)	% of Non Genuine trades of Noticee in the contract to 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	CESC15MAR500.00CEW3	106.01	46000	61.25	46000	80	34.78	95.65	29.28
2	CESC15MAR540.00CEW3	64.01	12000	36.5	12000	100	30.77	100	10.3
3	CESC15MAR560.00CEW3	44.54	65000	26.1	65000	100	64.71	100	39.39
4	ONGC15MAR280.00CEW3	33.36	55000	22.05	55000	30	5.56	27.5	4.98

12. 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;



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(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 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;

13. 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:

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.

14. In view of the above, the Noticee is required to Show Cause as to why an inquiry should not be held against the Noticee in terms of Rule 4 of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 read with Section 15I of the SEBI Act and why penalty, if any, should not be imposed on the Noticee under the provisions of Section 15HA of the SEBI Act.

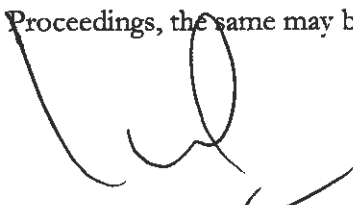
15. Your reply, along with supporting enclosures and documents, should reach the undersigned at the address mentioned below as well as through email at sureshm@sebi.gov.in and vikrams@sebi.gov.in



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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 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:

<u>List of documents</u>		
Sr. No.	Documents	Annexure
1	Copy of the Appointment Order dated September 30, 2021	A
2	Copy of the relevant extract of the investigation report	B
3	Trade log depicting all non-genuine trades of Noticee in Stock Option segment of BSE during investigation period	C
4	Summary of dealings of Noticee in contracts wherein he executed non-genuine trades	D

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 Parag Basu, 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 August 18, 2021 to enquire into and adjudge under Section 15HA of the 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 placed at 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 30th day of September, 2021.



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

S. No	Case ID	Case Name	PAN Number	Name of the entity	Phase of AO Communication	AO Name (Mr / Ms)
59	210017450	ISO at BSE-ARJUN JAGDISH DUNGARSHI	AQOPD9781D	ARJUN JAGDISH DUNGARSHI	3	Suresh B Menon
60	210007992	ISO at BSE-ARPAN TIEUP PVT LTD	AADCA9002E	ARPAN TIEUP PVT LTD	3	Suresh B Menon
61	210013729	ISO at BSE-ARPANA AGARWAL	ACVPA2901P	ARPANA AGARWAL	3	Suresh B Menon
62	210016208	ISO at BSE-ARPANA MANGLA	AIAPM1858L	ARPANA MANGLA	3	Suresh B Menon
63	210018458	ISO at BSE-ARPIT AGARWAL	BNBPA1591F	ARPIT AGARWAL	3	Suresh B Menon
64	210012962	ISO at BSE-ARPIT PATODI	ABSP3066E	ARPIT PATODI	3	Suresh B Menon
65	210011816	ISO at BSE-ARPIT AGRAWAL (HUF)	AAOHA7022C	ARPIT AGRAWAL (HUF)	3	Suresh B Menon
66	210017922	ISO at BSE-ARPIT JAIN	AXGPJ1549J	ARPIT JAIN	3	Suresh B Menon
67	210007974	ISO at BSE-ARRIANA BEGANI TRUST	AACTA9086A	ARRIANA BEGANI TRUST	3	Suresh B Menon
68	210010876	ISO at BSE-ARROWLINK CHEMICAL PRIVATE LIMITED	AAKCA1933D	ARROWLINK CHEMICAL PRIVATE LIMITED	3	Suresh B Menon
69	210010885	ISO at BSE-ARROWSPACE TREXIM PVT LTD	AAKCA4008M	ARROWSPACE TREXIM PVT LTD	3	Suresh B Menon
70	210012310	ISO at BSE-ARTI SRIVASTAVA	AATPS4676D	ARTI SRIVASTAVA	3	Suresh B Menon
71	210011351	ISO at BSE-ARTVIEW VANIYA PVT LTD	AAMCA8985F	ARTVIEW VANIYA PVT LTD	3	Suresh B Menon
72	210014342	ISO at BSE-ARUN AGGARWAL	ADQPA939DJ	ARUN AGGARWAL	3	Suresh B Menon
73	210013331	ISO at BSE-ARUN ENTERPRISES	ACIPK8046L	ARUN ENTERPRISES	3	Suresh B Menon
74	210013067	ISO at BSE-ARUN KUMAR	ABXPK4045K	ARUN KUMAR	3	Suresh B Menon
75	210010947	ISO at BSE-ARUN AGGARWAL HUF	AAKHA8574N	ARUN AGGARWAL HUF	3	Suresh B Menon
76	210010107	ISO at BSE-ARUN GOEL HUF	AAHHA0733R	ARUN GOEL HUF	3	Suresh B Menon
77	210013214	ISO at BSE-ARUN KUMAR AGARWAL	ACFPA2396A	ARUN KUMAR AGARWAL	3	Suresh B Menon
78	210006927	ISO at BSE-ARUN KUMAR AGRAWAL	AABHA7915H	ARUN KUMAR AGRAWAL	3	Suresh B Menon
79	210009752	ISO at BSE-ARUN KUMAR BANKA HUF	AAGHA8179Q	ARUN KUMAR BANKA HUF	3	Suresh B Menon
80	210014741	ISO at BSE-ARUN KUMAR BANTHIA	AEGPB5876F	ARUN KUMAR BANTHIA	3	Suresh B Menon
81	210012809	ISO at BSE-ARUN KUMAR CHOUDHARY	ABLPC1549C	ARUN KUMAR CHOUDHARY	3	Suresh B Menon
82	210013895	ISO at BSE-ARUN KUMAR GOENKA	ACZPG7689N	ARUN KUMAR GOENKA	3	Suresh B Menon
83	210015691	ISO at BSE-ARUN KUMAR GOYAL	AGBPG9517F	ARUN KUMAR GOYAL	3	Suresh B Menon
84	210013552	ISO at BSE-ARUN KUMAR JALUKA	ACQPJ1808H	ARUN KUMAR JALUKA	3	Suresh B Menon
85	210015076	ISO at BSE-ARUN KUMAR KEDIA	AEYPK6259D	ARUN KUMAR KEDIA	3	Suresh B Menon
86	210011413	ISO at BSE-ARUN KUMAR PODDAR (HUF)	AAMHA5264Q	ARUN KUMAR PODDAR (HUF)	3	Suresh B Menon
87	210018569	ISO at BSE-ARUN KUMAR SAXENA	BRLPS1779M	ARUN KUMAR SAXENA	3	Suresh B Menon
88	210008290	ISO at BSE-ARUN KUMAR SHAH HUF	AADHA1066P	ARUN KUMAR SHAH HUF	3	Suresh B Menon
89	210009735	ISO at BSE-ARUN M CHAVAN HUF	AAGHA3982D	ARUN M CHAVAN HUF	3	Suresh B Menon
90	210007634	ISO at BSE-ARUN MOHLA HUF	AACHA6551Q	ARUN MOHLA HUF	3	Suresh B Menon
91	210016793	ISO at BSE-ARUNA DEBI DUGAR	AKYPD8287E	ARUNA DEBI DUGAR	3	Suresh B Menon
92	210014041	ISO at BSE-ARUNIMA GULATI	AHKPG3470B	ARUNIMA GULATI	3	Suresh B Menon
93	210007279	ISO at BSE-ARUNODAY MERCHANTS PRIVATE LIMITED	AACCA2486K	ARUNODAY MERCHANTS PRIVATE LIMITED	3	Suresh B Menon
94	210015643	ISO at BSE-ARVIND KUMAR KARNANI	AFYPK8027J	ARVIND KUMAR KARNANI	3	Suresh B Menon
95	210006917	ISO at BSE-ARVIND KUMAR SURESH CHANDBAGDI	AABHA2754C	ARVIND KUMAR SURESH CHANDBAGDI	3	Suresh B Menon
96	210011971	ISO at BSE-ARVINDKUMAR BABULAL ALMAL	AAPPA7883E	ARVINDKUMAR BABULAL ALMAL	3	Suresh B Menon
97	210010719	ISO at BSE-ARVINDKUMAR RAMNIWAS MAHESHWARI HUF	AJJHA8391M	ARVINDKUMAR RAMNIWAS MAHESHWARI HUF	3	Suresh B Menon
98	210009651	ISO at BSE-ARYA TRADECOM PRIVATE LIMITED	AAGCA7250B	ARYA TRADECOM PRIVATE LIMITED	3	Suresh B Menon
99	210010874	ISO at BSE-ARYADEEP COMPLEX PRIVATE LIMITED	AAKCA1378E	ARYADEEP COMPLEX PRIVATE LIMITED	3	Suresh B Menon
100	210010053	ISO at BSE-ASAN STEELS PRIVATE LIMITED	AAHCA8637P	ASAN STEELS PRIVATE LIMITED	3	Suresh B Menon
101	210008661	ISO at BSE-ASANSOL POLYFABS PRIVATE LIMITED	AAECA0154G	ASANSOL POLYFABS PRIVATE LIMITED	3	Suresh B Menon
102	210013739	ISO at BSE-ASHA AGARWAL	ACVPA5524G	ASHA AGARWAL	3	Suresh B Menon
103	210015410	ISO at BSE-ASHA AGARWAL	AFOPA0366C	ASHA AGARWAL	3	Suresh B Menon
104	210015265	ISO at BSE-ASHA AGRAWAL	AFIPA2658B	ASHA AGRAWAL	3	Suresh B Menon
105	210014404	ISO at BSE-ASHA DIDWANIA	ADSPD5087D	ASHA DIDWANIA	3	Suresh B Menon
106	210016170	ISO at BSE-ASHA GUPTA	AHWPG2441A	ASHA GUPTA	3	Suresh B Menon
107	210012651	ISO at BSE-ASHA JAIN	ABAPJ0048G	ASHA JAIN	3	Suresh B Menon
108	210013825	ISO at BSE-ASHA JAIN	ACIPJ2966N	ASHA JAIN	3	Suresh B Menon
109	210018593	ISO at BSE-ASHA JAIN	ACRPJ1742H	ASHA JAIN	3	Suresh B Menon
110	210014954	ISO at BSE-ASHA JAIN	ADQPJ1589A	ASHA JAIN	3	Suresh B Menon
111	210013793	ISO at BSE-ASHA JHA	ACWPJ6895Q	ASHA JHA	3	Suresh B Menon
112	210015718	ISO at BSE-ASHA RANI	AGCPR2640F	ASHA RANI	3	Suresh B Menon
113	210013261	ISO at BSE-ASHA VIJAY	ACGPV8710N	ASHA VIJAY	3	Suresh B Menon
114	210014270	ISO at BSE-ASHA DEVI DUGAR	ADNPD1737B	ASHA DEVI DUGAR	3	Suresh B Menon
115	210012473	ISO at BSE-ASHA DEVI LAKKAR	AAWPL1286B	ASHA DEVI LAKKAR	3	Suresh B Menon
116	210017864	ISO at BSE-ASHA DEVI SULTANIA	AWDPS8484M	ASHA DEVI SULTANIA	3	Suresh B Menon
117	210015179	ISO at BSE-ASHA KEDIA	AFDPK0834J	ASHA KEDIA	3	Suresh B Menon
118	210007284	ISO at BSE-ASHA TRADECOM PRIVATE LIMITED	AACCA3631Q	ASHA TRADECOM PRIVATE LIMITED	3	Suresh B Menon
119	210013603	ISO at BSE-ASHABEN BHUPENDRAKUMAR PATEL	ACRPP3505C	ASHABEN BHUPENDRAKUMAR PATEL	3	Suresh B Menon
120	210007991	ISO at BSE-ASHDIL SALES PROMOTION PRIVATE LIMITED	AADCA8452C	ASHDIL SALES PROMOTION PRIVATE LIMITED	3	Suresh B Menon
121	210007280	ISO at BSE-ASHIANA PROPERTIES PVT LTD	AACCA2514J	ASHIANA PROPERTIES PVT LTD	3	Suresh B Menon
122	210009636	ISO at BSE-ASHIRWAD TIE UP PRIVATE LIMITED	AAGCA1397P	ASHIRWAD TIE UP PRIVATE LIMITED	3	Suresh B Menon
123	210010954	ISO at BSE-ASHIS DAS & SONS (HUF)	AAKHA7319C	ASHIS DAS & SONS (HUF)	3	Suresh B Menon
124	210016117	ISO at BSE-ASHISH BANSAL	AHPPB0224P	ASHISH BANSAL	3	Suresh B Menon

2. **Focus and Period of the Investigation:** The focus of the investigation was to ascertain the whether any of the suspected entities have violated the provisions of SEBI (PFUTP) Regulations, 2003 during the period April 01, 2014 to March 31, 2015. However, SEBI in its Interim order dated August 20, 2015 in the matter of Illiquid Stock Options recorded the following: "The investigation shall also cover the examination of any other entity executing similar fictitious trades in the stock options segment." Further, SEBI in its Confirmatory order dated August 22, 2016 in the matter of Illiquid Stock Options recorded the following: "The fact that certain entities have been left out of the interim order does not signify that they are outside the scope of SEBI's investigation or have been exonerated." In view of above, the focus of the investigation is taken as "to ascertain whether any of the entities have violated the provisions of SEBI (PFUTP) Regulations, 2003".

The period of examination as taken in Interim order was April 01, 2014 to March 31, 2015. Further, SEBI in its Interim order dated February 17, 2016 in respect of Trading Members in the matter of Illiquid Stock Options had extended the examination period. The examination period as taken in the aforesaid order dated February 17, 2016 was April 01, 2014 to September 30, 2015. Since the matter of Illiquid Stock Options and Trading Members in Illiquid Stock Options are related, the period of investigation for this report is taken as April 01, 2014 to September 30, 2015 (hereinafter referred to as "Investigation Period" or "I.P.")

Further, wherever necessary, reference has been made to period outside the investigation period.

3. **Identification of Entities:** In the Interim order, the following 59 entities were identified:

Table 1: List of entities against whom actions were taken in the Interim Order.

Loss Making Entities			Profit Making Entities		
S. No.	Entity Name	Entity PAN	S. No.	Entity Name	Entity PAN
1	Adarsh Credit Co Op Society Limited	AAJAJ0001J	36	N M Index Pvt. Ltd.	AAACN0041M
2	Adarsh Builders Limited	AAAGP0727L	37	Vision Sports & Tech Pvt. Ltd.	AAACV04701R
3	Adarsh Jewellers Pvt. Ltd.	AAAP00002R	38	Umesh Bhatnagar	AAACV0721K
4	Adarsh Perfumes	AAAGP0744B	39	Ved Vihar Pvt. Ltd.	AAACV0810G
5	Adarsh Enterprises	AAAGP0700X	40	Shri Chaitanya & Friends LLP	AAACU07002J
6	Kundan Stone Mine Limited	AAAGP0700P	41	Jai Anand Investments Pvt. Ltd.	AAACU07000Q
7	J B Overseas	AAAF00001J	42	Shree Vihar Pvt. Ltd.	AAAGP0800X
8	Adarsh Commodities	AAAF00000D	43	Mohini Commodities Pvt. Ltd.	AAACM07104M
9	Adarsh Retail Private Limited	AAACM0000A	44	Empire Iron & Steel Pvt. Ltd.	AAACE07007C
10	Adarsh Industries	AAAF00001J	45	K. S. S. Trading	AAACM07000Q
11	Kundan Care Products Limited	AAACM0744R	46	Tradebull Enterprises Pvt. Ltd.	AAACE07104M
12	Adarsh Mining Corporation	AAACM0700Q	47	Avit Bhatnagar	DCIP000013Q
13	Adarsh Mining Mines & Metals Pvt. Ltd.	AAACM0700E	48	Ketan Ramchand Shah Pvt.	AAACM07004K
14	Adarsh Vastu Private Limited	AAACM07104A	49	Steel Creators Pvt. Ltd.	AAACM07003F
15	Adarsh Finance Pvt. Ltd.	AAACM0700P	50	Prime Gold International Ltd.	AAACM07003F
16	Adarsh Jewellers Private Limited	AAACM0700D		Raj Ratan Jewellers Pvt. Ltd.	AAACM07003N

Investigation in the matter of trading activities of certain entities in Illiquid Stock Options

SECURITIES AND EXCHANGE BOARD OF INDIA

Confidential

SECURITIES AND EXCHANGE BOARD OF INDIA			Profit making Entities		
Loss making Entities					
S No.	Entity Name	Entity PAN	S No.	Entity Name	Entity PAN
17	Shakti Concept Trading Llp	ACBFS8999B	51	Bourabh H Bora	ADIPB7600R
18	Ashok Kumar Dementi	ACXP06000R	52	Eden Trading Services Pvt. Ltd.	AADEC1272A
19	Vijay Rajendra Shah Huf	AABHM1007P	53	Mammon Concept Pvt. Ltd.	AAGCM835G
20	Swaran Financial Private Limited	AAEC91024R	54	Shawari Feroze Pvt Ltd	AACBS300A
21	Vijay Rajendra Kumar Shah	BGUPB7339K	55	Vip Steel Pvt Ltd	AACT2001K
22	Bharat Leona	AANFB0002C	56	Pavani Steel Pvt. Ltd.	AAAPB002R
23	Gyanesh Kranta	AGBP00040F	57	Dagap Nabendra Panthyan Huf	AAAPB300E
24	Gandhi Investment Private Limited	AACCG0017C	58	Krs Ramil Kothari	AAEP1321NC
25	Rishi Commercial Company	AAAPB1020K	59	Unish Malari	BCHPM5310A
26	Rishi Jagan	AADCP2002E			
27	Rakesh K Bell	AACCG3141P			
28	Oshin Futures And Derivatives Pvt Ltd	AABCO1130Q			
29	Pragya Commodities Private Limited	AABCP5784C			
30	Nipruti Advisory Services Pvt Ltd	AADCM1774A			
31	Gia Stock Private Limited	AAACAB00C			
32	Om Sales Corporation	KAAPY4343E			
33	Promet Commodities Ltd	AADCP10100			
34	Gurmit Shah	AAAPB0051E			

Entities appearing at S. No. 1 to 34 were categorised as "Loss making" if the loss is of Rs. 5 crore or more in

In the above table, entities appearing at S. No. 1 to 34 were categorised as "Loss making entities" i.e. those entities that had made a loss of Rs. 5 crore or more by executing reversal transactions in BSE's stock options segment during the period April 01, 2014 to March 31, 2015. Further, entities appearing at S. No. 35 to 59 were categorised as "Profit making entities" i.e. those entities that had made a profit of Rs. 5 crore or more by executing reversal transactions in BSE's stock options segment during the period April 01, 2014 to March 31, 2016.

However, as mentioned at Para 2, in light of the directions in the interim order, this investigation covers the entire trading happened in BSE's Stock Options segment during the I.P. This includes the trade analysis of all entities that have traded in BSE's Stock Options segment during the I.P. (including the aforementioned 59 entities).

4. Trading in BSE's Stock Options segment during the investigation Period - Trade data of BSE's Stock Options segment during the I.P. was obtained from BSE (placed at Annexure 7) and the following is observed:

Table 2 - Trade data of BSE's Stock Options segment during the I.P.

Total No. of unique contracts traded during the I.P.	23,885
Total No. of trades during the I.P.	3,58,372
Total No. of entities traded during the I.P.	21,652
Total traded volume during the I.P. (in no.)	1610,05,04,571
Total traded value during the I.P. (in Rs.) (Based on premium turnover)	Rs. 7204,04,79,847
Total traded value during the I.P. (in Rs.) (Based on nominal turnover)	Rs. 221438,00,86,489

* Premium Turnover = sum total of (Premium value * quantity of each trade) for all contracts during the I.P.
 * Nominal Turnover = sum total of [(Strike Price + Premium value) * quantity of each trade] for all contracts during the I.P.

From the above table, it is observed that during the I.P., 21,652 entities traded in BSE's Stock Options segment in 23,885 different contracts with number of trades being 3,58,372 and total turnover of Rs. 7,204 crores.

5. Identification of Reversal Trade / Non Genuine trades and Reversal Trade Quantity / Artificial volume - Reversal trades have been classified as those trades in which an entity reverses its buy or sell positions in a contract with subsequent sell or buy positions with the same counterparty during the same day. For the sake of clarity, a contract is shortlisted (i.e. "HDIL14NOV100.00CEW2") and all trades that were



Table 3 - Details of trades executed in the contract "HDIL14NOV100.00CEW2" during the I.P.

S. No.	Date	Buyer	Seller	Sell Order Time	Buy Order Time	Trade Time	Trade Rate (in Rs.)	Trade Quantity	Trade Value (in Rs.)
1	12/11/2014	Ramdit Infra Projects Pvt Ltd	First Financial Services Ltd	16:21:01.94	16:24:26.73	16:24:26.73	1.1	120000	132000
2	13/11/2014	Adityamaharaj Financial	Shailini Jain	10:54:35.77	10:54:41.95	10:54:41.95	1.25	400000	500000
3	13/11/2014	Adityamaharaj Financial	Shailini Jain	10:54:28.95	10:54:41.95	10:54:41.95	0.1	4000	400
4	13/11/2014	Samarth Financial Services	Kanan Khanik Shah	12:11:12.43	12:11:41.70	12:11:41.70	1.15	48000	55200
5	13/11/2014	Samarth Financial Services	Kanan Khanik Shah	12:10:49.63	12:11:41.70	12:11:41.70	1.2	48000	57600
6	13/11/2014	Kanan Khanik Shah	Samarth Financial Services	12:13:27.30	12:13:30.76	12:13:30.76	0.05	48000	2400
7	13/11/2014	Kanan Khanik Shah	Samarth Financial Services	12:13:27.30	12:13:35.37	12:13:35.37	0.05	44000	2200
TOTAL								7,12,000	7,49,000

Below mentioned are some of the observations made from the above table:

- In total 7 trades were executed in the contract "HDIL14NOV100.00CEW2" during the I.P. Out of 7 trades, Samarth Financial Services placed a buy order of 96,000 units of Put Option of contract "HDIL14NOV100.00CEW2" on 13/11/2014 at 12:11:41 pm. This buy order got matched with pending 2 sell orders of Kanan Khanik Shah in the same contract for a total of 96,000 units. This resulted in 2 trades with total trade quantity of 96,000 units and trade value of Rs. 1,12,800.
- Thereafter, on the same day, about 2 minutes later, Samarth Financial Services placed a sell order of 92,000 units of contract "HDIL14NOV100.00CEW2" which got matched with corresponding 2 pending buy orders of Kanan Khanik Shah in the same contract for a total of same units. This resulted in 2 trades with total trade quantity of 92,000 units and trade value of Rs. 4,600.
- The remaining 3 trades in this contract during the I.P. were executed between different set of entities and were not reversed by them.
- From the above, it can be seen that total number of non genuine trades that were executed in the contract "HDIL14NOV100.00CEW2" were 4 (trades shown at S. No. 4 to 7 at Table 3) and total artificial volume generated through such non genuine trades was 1,84,000 units (48000+ 48000+ 44000+ 44000).
- The entity wise contribution to number of non genuine trades and artificial volume in the above contract is shown below:

Table 4 - Entity wise contribution to non genuine trades and artificial volume in the contract "HDIL14NOV100.00CEW2" during the I.P.

S. No.	Entity Name	Artificial volume through non genuine trades	Number of Non genuine trades	% of artificial volume generated through non genuine trades to total market volume	% of number of non genuine trades to total market trades
1	Samarth Financial Services	1,84,000	4	25.84%	57.14%
2	Kanan Khanik Shah	1,84,000	4	25.84%	57.14%
Total Non genuine trades		1,84,000	4	25.84%	57.14%

From Table 3, it is observed that trades at S. No. 4 to 7 are considered as non genuine trades. Further, out of 4 non genuine trades, Samarth Financial Services was involved in all such 4 trades (by appearing as buyer in 2 trades and as seller in 2 trades). Hence, it is concluded that Samarth Financial Services was involved in 4 non genuine trades and generated artificial volume of 1,84,000 through reversal trades. Similarly, Kanan Khanik Shah was also involved in 4 non genuine

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trades and generated artificial volume of 1,84,000 through reversal trades. Hence, the aforementioned two entities have violated Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a) of SEBI Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations), 2003.

6. Analysis of Reversal trades / Non genuine Trades during the I.P. - The modus operandi that was identified in the Interim order and Confirmatory order was that certain entities had continuously made profits and certain entities had continuously made losses by reversing their trades or executing reversal trades in various individual Stock Options contracts on BSE's Stock Options segment. In the Interim order, these reversal trades were also referred to as "non-genuine trades". In view of the directions in the Interim order and Confirmatory order, investigation of trades has been done for all entities that had traded in BSE's Stock Options segment during the I.P. Total number of contracts during the I.P. was 23885 contracts. The details of trading in such 23885 contracts are shown in table below:

Table 5 - Details of trading in all contracts of BSE Stock Options segment during the I.P.

Particulars	TOTAL
Number of contracts	23,885
Total Number of entities	21,652
Turnover (in Rs.)	Rs. 7,204.66 crores
Traded Quantity	1,510.96 crores
Number of trades	3,58,372
Number of Non genuine trades	2,91,643
Artificial volume generated through Non genuine trades	826.21 crores
% of Non genuine trades to total number of market trades	81.38%
% of artificial volume generated through Non genuine trades to market volume	54.68%
Number of entities involved in executing non genuine trades	14720

From the above table, the following is observed:

- i) Out of total trades that were executed in BSE's Stock Options segment during the I.P., 81.38% trades were Non genuine trades.
- ii) Total artificial volume generated through such Non genuine trades was 54.68% of total traded volume in BSE's Stock Options segment during the I.P.
- iii) Out of 21,652 entities that had traded in BSE's Stock Options segment during the I.P., 14,720 entities were involved in executing such Non genuine trades.

7. Contract wise analysis of trade data during the I.P.- Total number of unique contracts that were traded during the I.P. in were 23885 contracts. It may be noted that trading in one contract may or may not impact trading in another contract since contracts are unique in terms of underlying stock, strike price, expiry date etc. Further, out of 23,885 contracts, there would be certain contracts in which the number of trades would be minimal (as the total trades across all contracts during I.P. were 3,58,372). Hence, analysing trading in each contract separately would not be feasible. Therefore, the contracts are first classified based on the number of trades executed in each contract and then the analysis of separate categories of contracts is done. The contracts are categorised based on the number of trades in each contract as shown below:

Table 6 - Categories of contracts based on number of trades in each contract

S. No.	Classification of contracts by number of trades	Number of contracts	Turnover (in Rs.)	Traded Quantity	Number of trades	Number of entities traded
		1	22,65,00,000	1,30,11,500	62,869	28



S. No.	Classification of contracts by number of trades	Number of contracts	Turnover (In Rs.)	Traded Quantity	Number of trades	Number of entities traded
3	101-1000 trades	82	84,10,16,313	11,21,96,760	41,226	554
4	51-100 trades	136	456,94,80,094	67,28,33,376	8,854	2,085
5	41-50 trades	113	211,87,28,388	36,68,28,000	5,082	1,742
6	31-40 trades	270	421,22,93,236	61,76,18,288	9,439	3,300
7	21-30 trades	728	788,84,32,418	183,35,55,490	17,081	5,586
8	11-20 trades	2891	1709,37,05,928	405,82,88,874	81,828	10,288
9	1-10 trades	19801	3493,73,37,353	730,52,84,930	78,616	13,870
	Total Market	23885	7204,64,78,847	1516,95,98,571	3,58,372	21,682

From the above table, it is observed that maximum trading in terms of turnover had happened in contracts in which the number of trades are less than 10 trades in each contract. It is evident from the fact that out of total trading turnover of Rs. 7204 crore (approx.) in BSE's Stock Options segment during the I.P., Rs. 3493 crore (48.49% of total market) was contributed by contracts in which the number of trades was between 1-10 trades each. The total number of such contracts was 19801 contracts out of total 23885 contracts in which trading happened during the I.P.

The aforementioned classification of contracts was further classified into 2 broad categories:

- i) **Group A Contracts** - Includes all such contracts in which number of trades was more than 100 trades during the I.P. (i.e. contracts shown at S. No. 1 to 3 in above table). Since the number of trades in each of these contracts is more and consequently the number of entities trading in each of such contracts was also more. Hence, trades happened in these contracts were analysed in detail to identify any manipulative pattern.
- ii) **Group B Contracts** - Includes all such contracts in which number of trades was equal to or less than 100 trades during the I.P. (i.e. contracts shown at S. No. 4 to 9 in above table). In Group B Contracts, the number of trades happened was very less and consequently the entities trading in each of such contract was also less. In such a scenario, there is high possibility that the buy / sell orders placed by one entity get matched with the same entity or with a few entities only who had traded in such contracts. Hence, the percentage of artificial volume through reversal / non-genuine trades to total trading volume would be very high. However, this may not be called as manipulation as the number of entities trading in each of such contracts would be very few and the reversal trades are bound to happen in such scenario. Further, in Group B contracts, the chances of repetition of any manipulative pattern (in terms of reversal / circular trades) by any particular entity in a particular contract are also limited as the total number of trades happened in each contract is less (less than 100 trades).

7.1. Analysis of trades in Group A Contracts - As mentioned above, Group A contracts refers to all such contracts in which number of trades was more than 100 trades during the I.P. The number of such contracts during the I.P. was 146 contracts. The details of trading in such 146 contracts is shown in table below:

Table 7 - Details of trading in Group A contracts during the I.P.

Classification of contracts	>5000 trades	1001-5000 trades	101-1000 trades	TOTAL (>100 trades)
Particulars				
Number of contracts	8	66	82	146
Total Number of entities	28	80	554	614
Turnover (In Rs.)	Rs. 22.7 crores	Rs. 57.9 crores	Rs. 64.1 crores	Rs. 144.85 crores

Annexure in the matter of trading activities of certain entities in Mumbai Stock Exchange



Classification of contracts	>5000 trades	1001-5000 trades	101-1000 trades	TOTAL (>100 trades)
Particulars				
Traded Quantity	1,30,11,500	3,18,05,376	11,21,96,750	15,71,13,626
Number of trades	52,859	1,04,533	41,228	1,98,618
Number of Non genuine trades	52,841	1,04,484	39,884	1,97,189
Artificial volume through Non genuine trades	1,30,07,750	3,18,94,500	4,50,73,750	8,99,76,000
% of Non genuine trades to total number of market trades	99.97%	99.95%	96.70%	99.28%
% of Artificial volume generated through Non genuine trades to total market volume	99.97%	99.97%	40.17%	57.27%
Number of entities involved in Non genuine trades	28	79	220	279

From the above table, the following is observed:

- Almost all trades that had happened in category of contracts with more than 1000 trades each were non genuine trades. Further, the artificial volume generated through such non genuine trades was also 99.97% of total trading volume in such contracts.
- In category of contracts with trades between 101-1000, the number of non genuine trades executed was 96.70%, however, the artificial volume generated through such trades was 40.17% total market trading volume in such contracts.
- On an overall basis, the number of non genuine trades during the I.P. in contracts with more than 100 trades each (Group A contracts) was 99.28% of total number of trades in such contracts which signifies that these contracts were used by the entities for only reversing their transactions.
- The total number of entities that were trading in Group A contracts was 614 entities and out of these 279 entities were indulged in executing non genuine trades.

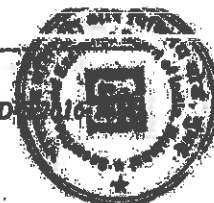
7.2. Analysis of trades in Group B Contracts - As mentioned at Para 7, Group B contracts refers to all such contracts in which number of trades was equal to or less than 100 trades during the I.P. The number of such contracts during the I.P. was 23739 contracts. The details of trading in such 23739 contracts is shown in table below:

Table 8 - Details of trading in Group B contracts during the I.P.

Particulars	TOTAL (<=100 trades)
Number of contracts	23,739
Total Number of entities	21,528
Turnover (in Rs.)	Rs. 7,059.99 crores
Traded Quantity	1,405.25 crores
Number of trades	1,69,754
Number of Non genuine trades	94,454
Artificial volume generated through non genuine trades	817.21 crores
% of Non genuine trades to total number of market trades	59.12%
% of artificial volume generated through non genuine trades to total market volume	54.65%
Number of entities involved in non genuine trades	14,676

From the above table, the following is observed:

- Percentage of non genuine trades was 59.12% of total trades that were executed in Group B contracts during the I.P.
- Artificial volume generated through such non genuine trades was 54.65% of total traded volume in Group B contracts during the I.P.
- Out of 21,528 entities that had traded in Group B contracts during the I.P., 14,676



7.3. Entities Involved in executing non genuine trades across all contracts – As mentioned at Table 5 of the report, It is observed that 14,720 entities were indulged in executing non genuine trades during the I.P. A summary of non genuine trades executed by top 10 entities during the I.P. is given in table below:

Table 9 - Summary of non genuine trades executed by top 10 entities in all contracts

S. No.	Entity PAN	Entity Name	Artificial Volume	Number of Non genuine trades	% of artificial volume generated through Non genuine trades to total market volume	% of non genuine trades to total market trades
1	AAIF38851J	J B Overseas	30,70,27,580	4,888	2.03%	1.39%
2	AABEN0541M	N M Impex Pvt Ltd	24,57,42,800	6,646	1.83%	1.56%
3	AADCM7181M	Motilal Commodities Pvt Ltd	22,48,06,000	339	1.49%	0.05%
4	ABOPN7219K	Umang Naman	21,85,44,000	830	1.45%	0.23%
5	AABCV6316G	VSP Overseas Pvt Ltd	11,55,37,000	680	0.76%	0.16%
6	AAAP89561E	Gurmeet Singh	9,01,31,204	626	0.80%	0.16%
7	AGBP00640F	Grandest Khemka	8,71,80,000	100	0.56%	0.03%
8	AABCV4781R	Vision Spande Iron Pvt Ltd	7,89,67,400	543	0.83%	0.15%
9	AAALAD298J	Korah Credit Co Op Society Ltd	7,87,21,572	969	0.63%	0.27%
10	AAACE1287C	Evergrowing Iron & Finvest Pvt Ltd	7,80,56,500	253	0.82%	0.07%
Total of Top 10 entities			147,50,21,736	14,618	9.76%	4.08%
Grand Total - All Reported / Non genuine Trades			826,20,50,626	2,91,263	54.88%	81.39%

From the above table, it is observed that top 10 entities were involved in executing non genuine trades that contributed 4.08% to total number of trades executed in BSE's Stock Options segment during the I.P. Further, the contribution of top 10 entities to artificial volume generated through non genuine trades was 9.76% to total market volume during the I.P. It was also observed that all the aforementioned 10 entities were part of those 59 entities against which directions were issued in the Interim order dated August 20, 2015.

Apart from the individual contribution of entities to market volume through non genuine trades, the contribution of various unique pairs of entities was also analysed. Here, Unique Pair of entities refers to any 2 entities who had engaged in reversal of trades among themselves. Contribution of Top 10 such pairs of entities who have contributed maximum to artificial volume by reversing their transactions across all contracts in the market during the I.P. are shown table below:

Table 10 - Artificial volume generated by top 10 pair of entities during the Investigation Period

S. No.	Entity A	Entity B	Artificial volume	% of artificial volume generated through Non genuine trades to total market volume
1	Motilal Commodities Pvt. Ltd.*	Grandest Khemka*	6,14,82,000	0.34%
2	Umang Naman*	Shri Sahasrati Bakti Steels Ltd.	3,21,62,000	0.23%
3	Motilal Commodities Pvt. Ltd.*	Calendula Traders Pvt. Ltd.	2,91,58,000	0.19%
4	Leenaben Sureshchandra Kachada	Umang Mahendra Shah	2,84,28,000	0.17%
5	Minola Holdings Ltd	Umang Naman*	2,82,22,000	0.16%
6	Shree Ganesh Traders	Pratik Commodities Pvt. Ltd.*	2,12,58,000	0.15%
7	Grandest Khemka Pvt. Ltd.	Pratik Commodities Pvt. Ltd.*	2,05,40,000	0.14%
8	Motilal Commodities Pvt. Ltd.*	Minola Holdings	1,91,38,000	0.13%
9	GCK Stock Pvt. Ltd.*	Shree Ganesh Traders	1,80,72,000	0.13%
10	Gopi Kishan Meheri	Minola Holdings	1,55,63,000	0.10%
Total of Top 10 pair of entities			25,58,58,000	1.70%
Grand Total - All Reported / Non Genuine Trades			826,20,50,626	54.88%

* Represents those entities against which directions were issued in Interim order dated August 20, 2015

From the above table, it is observed that top 10 unique pair of entities have together contributed 1.70% to market volume and none of the single unique pair of entities have contributed more than 0.34% to total market volume. On



analysing complete trade data of all contracts during the I.P., It is observed that there were 22860 different pairs of entities who have contributed 54.68% to total market volume through non genuine trades.

7.4. Conclusion on trade analysis - The following are the key observations made at Para 7.1, 7.2 and 7.3:

- i) The percentage of non genuine trades executed to total number of trades was higher in Group A contracts (99.30% of total trades) than in Group B contracts (59.32% of total trades).
- ii) The artificial volume generated through non genuine trades was almost same for both categories of contracts (Group A contracts - 57.27% and Group B contracts - 54.65%).
- iii) Trades of all entities across all contracts are analysed and it is observed that the top most unique pair of 2 entities that have contributed to artificial volume had contributed 0.34% to total market volume and top 10 pair of entities contributed 1.70% to market volume by executing reversal trades. Hence, no concentration is seen between any specific set of entities who had contributed to artificial volume through reversal trades. However, a large number of entities (total 14720 entities) were engaged in generation of artificial volume by executing reversal trades.

In view thereof, it is concluded that majority of the volume that was generated in BSE's Stock Options segment during the I.P. was artificial volume. A total of 14720 entities were involved in executing non genuine trades thereby violating Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a) of SEBI Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.



ARIJUN JAGDISH DUNGARSHI

sno	92990	92991	92992	92993	92994	92995
TRADE_DATE	13/03/2015	13/03/2015	13/03/2015	13/03/2015	13/03/2015	13/03/2015
SCRIPTCODE	857346	857346	857346	857346	857346	857346
clnt_pan	AAKHA6243B	AAACI4858Q	ACXP6089R	AQOPD9781D	AAACR4672E	AQOPD9781D
clnt_name	ABHISHEK SONI HUF	JANASAHAYOG HIRE PURCHASE CO(INDIA)PRIVATE LTD	ASHOK KUMAR DAMANI	ARIJUN JAGDISH DUNGARSHI	RADHE KRISHNA FISCAL PVT LTD	ARIJUN JAGDISH DUNGARSHI
cp_pan	AQOPD9781D	AQOPD9781D	AQOPD9781D	AAACR4672E	AQOPD9781D	AAACR4672E
cp_name	ARIJUN JAGDISH DUNGARSHI	ARIJUN JAGDISH DUNGARSHI	ARIJUN JAGDISH DUNGARSHI	RADHE KRISHNA FISCAL PVT LTD	ARIJUN JAGDISH DUNGARSHI	RADHE KRISHNA FISCAL PVT LTD
ORDER_NO	1426225598368001004	1426225598368001000	1426225598368001002	1426225598368001023	1426225598368001025	1426225598368001020
CP_ORDER_NO	1426225598368001005	1426225598368001001	1426225598368001003	1426225598368001024	1426225598368001026	1426225598368001021
TRADEID	5072	6147	6535	7536	7538	8360
ORDER_TIME	11:22:27.243573	11:19:26.132508	11:19:51.834936	11:58:54.950341	11:59:31.258295	11:58:41.549544
CP_ORDER_TIME	11:22:27.744322	11:19:26.533656	11:19:52.334774	11:58:55.452426	11:59:32.058140	11:58:41.549855
TRADE_TIME	11:22:27.744322	11:19:26.533656	11:19:52.334774	11:58:55.452426	11:59:32.058140	11:58:41.549855
ORDER_LMTIME	11:22:27.243573	11:19:26.132508	11:19:51.834936	11:58:54.950341	11:59:31.258295	11:58:41.549544
CP_ORDER_LMTIME	11:22:27.744322	11:19:26.533656	11:19:52.334774	11:58:55.452426	11:59:32.058140	11:58:41.549855
TRADE_RATE	26.5	25	26	42.5	44.6	34.1
LTP_RATE	-1.5	1.0	16.5	2.1	-10.5	
LTP_PERCENT	-5.66	4.0	63.46	4.94	-23.54	
TRADE_VALUE	9384000.0	11700000.0	16408000.0	301250.0	604600.0	297050.0
ORDER_RATE	26.5	25.0	26.0	42.5	44.6	34.1
CP_ORDER_RATE	26.5	25.0	26.0	42.5	44.6	34.1
ORDER_LMRATE	26.5	25.0	26.0	42.5	44.6	34.1
CP_ORDER_LMRATE	26.5	25.0	26.0	42.5	44.6	26.5
ORDER_LTP	26.0		25.0	34.1	42.5	34.1
CP_ORDER_LTP	26.5	25.0	26.0	42.5	44.6	34.1
TRADED_QTY	16000	20000	28000	500	1000	500
ORDER_QTY	16000	20000	28000	500	1000	500
CP_ORDER_QTY	16000	20000	28000	500	1000	500
ORDER_AVLQTY	16000	20000	28000	500	1000	500
CP_ORDER_AVLQTY	16000	20000	28000	500	1000	500
ORDER_LMQTY	16000	20000	28000	500	1000	500
CP_ORDER_LMQTY	16000	20000	28000	500	1000	500
MEMBER_NO	4029	4029	4029	4041	4029	4041
MEMBER_NAME	ODYSSEY SECURITIES PVT. LTD	ODYSSEY SECURITIES PVT. LTD	ODYSSEY SECURITIES PVT. LTD	NS BROKING PVT. LTD.	ODYSSEY SECURITIES PVT. LTD	NS BROKING PVT. LTD.
OLD_CLIENT		BS000761	BS00898	NS00018	BS00009	NS00018

CP_OLD_CLIENT	NS00018	902	NS00018	902	BS00009	902	BS00009	902
CP_MODIFIED_CLIENT	NS00018	902	NS00018	902	BS00009	902	BS00009	902
TERMINALID	NS00018	902	NS00018	902	BS00009	902	BS00009	902
USER_NAME	SANJAY BANSAL	902	SANJAY BANSAL	902	AKASH AGARWAL	902	AKASH AGARWAL	902
LOCATION_ADDRESS	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902	115, BANGUR AVENUE, BLOCK C, KOLKATA 700055 KOLKATA WEST BENGAL 700055	902	115, BANGUR AVENUE, BLOCK C, KOLKATA 700055 KOLKATA WEST BENGAL 700055	902
CP_TERMINALID	AKASH AGARWAL	902	AKASH AGARWAL	902	SANJAY BANSAL	902	SANJAY BANSAL	902
CP_USER_NAME	115, BANGUR AVENUE, BLOCK C, KOLKATA 700055 KOLKATA WEST BENGAL 700055	902	115, BANGUR AVENUE, BLOCK C, KOLKATA 700055 KOLKATA WEST BENGAL 700055	902	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
CP_LOCATION_ADDRESS	115, BANGUR AVENUE, BLOCK C, KOLKATA 700055 KOLKATA WEST BENGAL 700055	902	115, BANGUR AVENUE, BLOCK C, KOLKATA 700055 KOLKATA WEST BENGAL 700055	902	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902	16, INDIA EXCHANGE PLACE KOLKATA 700001 KOLKATA WEST BENGAL 700001	902
ORDER_AUD	A	902	A	902	A	902	A	902
CP_ORDER_AUD	A	902	A	902	A	902	A	902
ORDER_TYPE	L	902	L	902	L	902	L	902
CP_ORDER_TYPE	L	902	L	902	L	902	L	902
LOCATIONID	7000010001001012	902	7000010001001012	902	7000550001002012	902	7000550001002012	902
CP_LOCATIONID	7000550001002012	902	7000550001002012	902	7000010001001012	902	7000010001001012	902
SCRIPNAME	CESC15MAR560.00CEW3	902	CESC15MAR560.00CEW3	902	CESC15MAR560.00CEW3	902	CESC15MAR560.00CEW3	902
EXPIRY	2015-03-19	902	2015-03-19	902	2015-03-19	902	2015-03-19	902
STRIKEPRICE	56000.0	902	56000.0	902	56000.0	902	56000.0	902
SERIES	EQD	902	EQD	902	EQD	902	EQD	902
MKT_TYPE	N	902	N	902	N	902	N	902
ISIN_NO		902		902		902		902
qty	16000	902	20000	902	500	902	1000	902

ARIJUN JAGDISH DUNGARSHI

Annexure-C

Index	0	0	0	0
clnt_pan	AQOPD9781D	AQOPD9781D	AQOPD9781D	AQOPD9781D
scripname	CESC15MAR500.00CEW3	CESC15MAR540.00CEW3	CESC15MAR560.00CEW3	ONGC15MAR280.00CEW3
buy_quantity	44000	12000	65000	55000
buy_value	4664450	768075	2895200	1835000
avg_buy_rate	106.01	64.01	44.54	33.36
sell_qty	46000	12000	65000	55000
sell_value	2817400	438000	1696600	1212750
avg_sell_rate	61.25	36.5	26.1	22.05
non_gen_trnx_entity_cntrct	8	4	11	3
total_trd_entity_cntrct	10	4	11	10
total_no_of_trades_of_the_cntrct	23	13	17	54
art_vol_gen_entity_in_the_cntrct	88000	24000	130000	110000
total_vol_gen_by_entity_in_the_cntrct	92000	24000	130000	400000
total_vol_in_the_contract	300500	233000	330000	2210000
prcnt_of_non_gen_trds_entity_total_trds_in_cntrct_entity	80	100	100	30
prcnt_of_non_gen_trds_entity_total_trds_in_cntrct	34.78	30.77	64.71	5.56
prcnt_of_art_vol_gen_entity_cntrct_total_vol_gen_by_entity_in_cntrct	95.65	100	100	27.5
prcnt_of_art_vol_gen_entity_cntrct_total_vol_in_cntrct	29.28	10.3	39.39	4.98

