



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

**GENERAL MANAGER
ENFORCEMENT DEPARTMENT-1**

EFD/DRA-1/SM/NH/SCN/RMCL/ /2017

June 27, 2017

(1) All Time Buildtech Private Limited 1/3866 Bhagwanpur Khera, Bhagirath Vihar Loni Road, Shahdara DELHI- 110094 14877/1	(11) Moti Lal 579 H-2 block, jahangir puri, DELHI- 110033 14877/11
(2) Anuradha Arora 9/57 Rajnagar Sector 9, Sekti 9 1 Ghaziabad, UTTAR PRADESH- 201001 14877/2	(12) Ever Bright Trading Private Limited (earlier known as Mould Trading Private Limited) 2f, Elegance Jasola, District Center, Old Mathra Road, New Delhi DELHI- 110025 14877/12
(3) Aradhna Choudhary B-9 Shashi Garden Gali No-7 Mayur Vihar Phase-I New Delhi DELHI -110091 14877/3	(13) Neetu Gupta FF 41 A F Block, Mangal Bazar Laxmi Nagar, NEW DELHI- 110092 14877/13
(4) B G Freight Shoppe India Private Limited 29-A 1st Floor J&K Block Laxmi Nagar DELHI- 110092 14877/4	(14) Pradeep H No W-34 Bhagat Singh, Gali Babar Pur, DELHI 14877/14
(5) Bharat Aman DPS Apartment Flat No 472 Sector 4 Plot No 16 Dwarka, NEW DELHI- 110075 14877/5	(15) Rajeev Kumar Ram Prasad Gupta 5/127 First Floor Vaishali Ghaziabad UTTAR PRADESH - 201010 14877/15
(6) Delicious Diamonds Private Limited Office No-302 Plot No E-35, Third Floor Jawahar Park, Laxmi Nagar DELHI-110092 14877/6	(16) Roshan Kumar Verma Sector -li/A, Qr No .3-006, B. S City, Bokaro, JHARKHAND- 827001 14877/16
(7) Gagan Wadhwa 3A 312 Rachna Vaishali Sec 3 Indrapuram Ps Ghaziabad UTTAR PRADESH 201010 14877/7	(17) Sanjay Mehta S O S N Mehta H 120 Manoj Vihar, Indrapuram G2b,- Ghaziabad, UTTAR PRADESH- 201010 14877/17
(8) Girraj Kumar Gupta HUF FF 41 A F Block Mangal Bazar Laxmi Nagar, NEW DELHI- 110095 14877/8	(18) South Asia Portfolios Private Limited BA/3D, Phase-1, Ashok Vihar , DELHI- 110052 14877/18
(9) Girraj Kumar Jagdish Prasad Gupta A105 BLOCK A PRIYA DARSHNI VIHAR LAXMI NAGAR, DELHI- 110092 14877/9	(19) Vineet Gupta B 82 Sector 56 Noida UTTAR PRADESH- 201301 14877/19
(10) Manoj Singh Bisht C 8/75 SEC 5 ROHINI, NEW DELHI- 110085 14877/10	





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Sub: Show Cause Notice (SCN) under section 11(1), 11(4) and 11B of the Securities and Exchange Board of India Act, 1992 in the scrip of Ram Minerals and Chemicals Limited (earlier known as ICVL Chemicals Limited)

1. Securities and Exchange Board of India (hereinafter referred to as 'SEBI') conducted an investigation of price manipulation in the scrip of Ram Minerals and Chemicals Limited (hereinafter called as 'the company' or 'Ram Minerals') to ascertain the possible violations of the provisions of SEBI Act, 1992 (hereinafter referred to as 'SEBI Act') and SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations, 2003 (hereinafter referred to as 'PFUTP Regulations') for the period of investigation i.e., December 13, 2013 to July 31, 2015, (hereinafter referred to as 'investigation period' or IP).
2. ICVL Chemicals Limited was incorporated on March 02, 2011 and operates in Specialty Chemicals industry. The company is listed on BSE. Name of the company was changed to Ram Minerals and Chemicals Limited w.e.f. April 10, 2015. During the investigation period, the directors of Ram Minerals were as follows:

[Table:1]

DIN	Name	Designation	Begin Date	End Date
05181168	Vikash Rana	Managing Director	16/06/2014	-
06903719	Amit Kumar Singh	Director	11/07/2014	-
07107427	Upender Kaur Sodhi	Director	27/02/2015	-
07172447	Alok Kumar Rai	Director	30/04/2015	-
07203946	Yash Sharma	CFO/Director	29/06/2015	-
06779770	Vinay Kumar	CFO/Director	16/06/2014	29/06/2015
06625403	Ankur Sharma	Director	16/06/2014	06/01/2015
03138031	Venkateshwara Suram Rao	Director	02/03/2011	11/07/2014
00389042	Siddharth Shah	Director	27/01/2012	16/06/2014
00796116	Vipul Modi	Director	02/03/2011	16/06/2014
00796382	Leena Modi	Director	02/03/2011	16/06/2014

3. During the investigation, the 6 new distinct groups of suspected entities viz. Group 1, Group 2, Group 3, Group 4, Group 5, Group 6 had been identified. Details of the groups are as placed as **Annexure: A**
4. During investigation period, the price of the scrip of the company opened at Rs. 2.2 on December 13, 2013 and closed at Rs. 219.55 on December 10, 2014, with a net LTP (Last Trade Price) of Rs. 217.35 and a market positive LTP of Rs.218.12. LTP analysis of the top ten net LTP contributors was carried out on the buy side and details are as

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follows:

Buy LTP analysis for the period (12/12/2013 – 10/12/2014) (Price rise) [Table 2]

Buyer Name	All trades			LTP Diff. > 0			LTP Diff. < 0			LTP Diff. = 0		% of positive LTP to Total Market positive LTP
	Sum of LTP diff	Sum of QTY	No. of trades	Sum of LTP diff	QTY traded	No. of trades	Sum of LTP diff	QTY traded	No. of trades	QTY traded	No. of trades	
DEEPA S PAREEK	29.35	129	13	29.35	99	12	0.00	0	0	30	1	13.46
RAVI GUPTA	21.15	1085	12	21.15	533	6	0.00	0	0	552	6	9.70
N L RUNGTA HUF	17.71	152	13	17.71	132	12	0.00	0	0	20	1	8.12
SOUTH ASIA PORTFOLIOS PRIVATE LIMITED	16.95	272	9	16.95	72	8	0.00	0	0	200	1	7.77
ANIL KUMAR SHARMA	11.05	11	6	11.05	11	6	0.00	0	0	0	0	5.07
SAURABH JAIN	9.70	5	4	9.70	5	4	0.00	0	0	0	0	4.45
GIRRAJ KUMAR GUPTA HUF	9.65	15	3	9.65	15	3	0.00	0	0	0	0	4.42
RAJESH PRAVINKUMAR JASANI	8.05	44	5	8.05	23	3	0.00	0	0	21	2	3.69
SAROJBALA PRAVINKUMAR JASANI	6.95	9	3	6.95	9	3	0.00	0	0	0	0	3.19
RAJEEV KUMAR RAM PRASAD GUPTA	6.38	1105	29	6.38	141	21	0.00	0	0	964	8	2.93
Top 10 Entities Total	136.94	2827	97	136.94	1040	78	0.00	0	0	1787	19	62.78
Market Total	217.35	35551885	460	218.12	5903089	188	-0.77	13045468	21	16603328	251	100

From the above table, it is observed that the top 10 entities contributed Rs. 136.94 to net LTP in 97 trades and Rs. 136.94 to positive LTP (62.78% to market positive LTP) in 78 trades. During this period, the trades by top 10 entities that contributed to positive LTP were analysed. It was observed that in all the 78 trades carried out by these entities that contributed to positive LTP, buy orders were placed first which contributed Rs.136.94 (62.78%) to market positive LTP.

5. The counterparties to trades by top 10 net LTP contributors that contributed to positive LTP were analysed and the observations are as follows:

(a) In 58 trades out of the 78 trades by the top 10 net LTP contributors that contributed to positive LTP, 15 suspected entities belonging to Group 1 appeared as the counterparties (sellers) contributing Rs. 101.43 (46.5%) to positive LTP.

(b) Below table summarizes the number of trades and quantity of shares by these 15 suspected entities as a counterparties (sellers) to top 10 net LTP contributors which contributed to positive LTP.





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[Table 3]

Sl. no	Seller Name	No. of trades (LTP > 0)	Total order quantity (LTP > 0)	No. of instances with sell order of 1 share	No. of instances with sell order of 2 shares	Positive LTP contribution (Rs.)	% of positive LTP to Total Market positive LTP	No. of shares held before these trades (CDSL/NSDL statements)	Balance no. of shares held (CDSL/NSDL statements/Broker declarations/statements)
1	ANURADHA ARORA	2	2	2	0	0.48	0.22	39996	39994
2	SANJAY MEHTA	1	2	0	1	0.35	0.16	25000	24998
3	EVER BRIGHT TRADING PRIVATE LIMITED (EARLIER KNOWN AS MOULD TRADING PRIVATE LIMITED)	6	18	2	2	2	0.91	7248	7185
4	NEETU GUPTA	2	2	2	0	2.64	1.21	1500	1498
5	ALL TIME BUILDTECH PRIVATE LIMITED	2	3	1	1	0.57	0.26	1750	1750
6	B G FREIGHT SHOPPE INDIA PRIVATE LIMITED	2	3	1	1	1.88	0.86	1138	811
7	SOUTH ASIA PORTFOLIOS PRIVATE LIMITED	1	2	0	1	3.5	1.6	271	269
8	PRADEEP	16	40	3	7	30.31	13.9	497	331
9	ROSHAN KUMAR VERMA	4	8	2	1	9.7	4.44	10	0
10	DELICIOUS DIAMONDS PRIVATE LIMITED	5	8	2	3	9.55	4.37	7	0
11	ARADHNA CHOUDHARY	4	10	0	2	8.25	3.78	10	0
12	GAGAN WADHWA	3	5	1	2	5.95	2.72	9	3
13	MOTI LAL	4	9	0	3	9.8	4.49	9	0
14	BHARAT AMAN	3	6	0	3	9.5	4.35	8	2
15	MANOJ SINGH BISHT	3	6	1	1	6.95	3.18	7	0
	Total (15 entities)	58	124	17	28	101.43	46.50	-	-
	Total (Market)					218.12	100	-	-

(c) The price of the scrip rose from Rs. 12 to Rs. 183.85 during the period from May 05, 2014 to November 27, 2014 out of which the rise of Rs. 101.43 (46.50% to market positive LTP) resulted from the 58 trades done by these 15 suspected entities. It is observed that in the 58 trades, all the 15 suspected entities had put their sell orders with quantity of shares in single digits i.e. mostly 1 or 2 or 3 shares whereas buy orders were available with quantity in the range of 12 to 5000 shares (mostly 200 or 500 or in thousands). By executing these trades, the suspected counterparties had matched the prices of prevailing buy orders which were placed at a higher price than the last traded price and thus contributed to the increased scrip price with each of their trades. It was also observed that these 58 trades were done on 58 different trading days across the period and each trade resulted in a higher LTP. From this pattern of trading, investigation observed that these entities were acting in concert in manipulating the scrip price and each day only one entity among the group was placing sell order in single





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digit. Thus, from their trading pattern investigation concluded that the intention of these entities was to mark the price higher and not merely to enter into the sale transactions carried out by them. Details of these trades are given in **Annexure-12**.

- (d) It was observed from the transaction statements from depositories (NSDL/CDSL) (**Annexure- 16**), that the entities from Sl. no. 1 to 8 in the above table were holding substantial quantity of shares during the period of their respective sale transactions. Despite holding abundant quantity of shares, these entities released limited number of shares and matched the above LTP buy orders with trade quantity in single digit. Thus, investigation concluded that they had no bona-fide intention to sell their holdings, but to manipulate the scrip price (Refer (c) above).
- (e) Ever Bright Trading Private Limited (Noticee no.12) (earlier known as Mould Trading Private Limited, (herein after referred to as Ever Bright or noticee no.12) had transferred 40000 & 25000 shares to Anuradha Arora (Noticee No.2) and viz Sanjay Mehta (Noticee No.17) respectively through offmarket route, whose trading pattern is given at (c) & (d) above.
- (f) All Time Buildtech Private Limited (Noticee No.1) had transferred 1500 shares through offmarket route to Neetu Gupta (Noticee No.13), whose trading pattern is given at (c) & (d) above.
- (g) Ever Bright (Noticee No.12) had transferred 500 shares through offmarket route to Pradeep(Noticee No.14) and further Pradeep had executed 16 sale trades and his trading pattern is given at (c) & (d) above.
- (h) Pradeep (Noticee No.14), who had received shares in offmarket from Ever Bright (Noticee No.12), had transferred 10 shares each to two Noticees namely Roshan Kumar Verma and Delicious Diamonds Pvt Ltd (Noticee no.16 and Noticee no 6) respectively through offmarket and their trading pattern is given at (c) above.
- (i) Ever Bright (Noticee No.12) had transferred 10 shares each to 5 suspected noticees namely Aradhna Choudhary (Noticee No.3), Gagan Wadhwa (Noticee No.7), Moti Lal (Noticee No.11), Bharat Aman (Noticee No.5), Manoj Singh Bisht (Noticee No.10) through offmarket route and their trading pattern is given at (c) above.

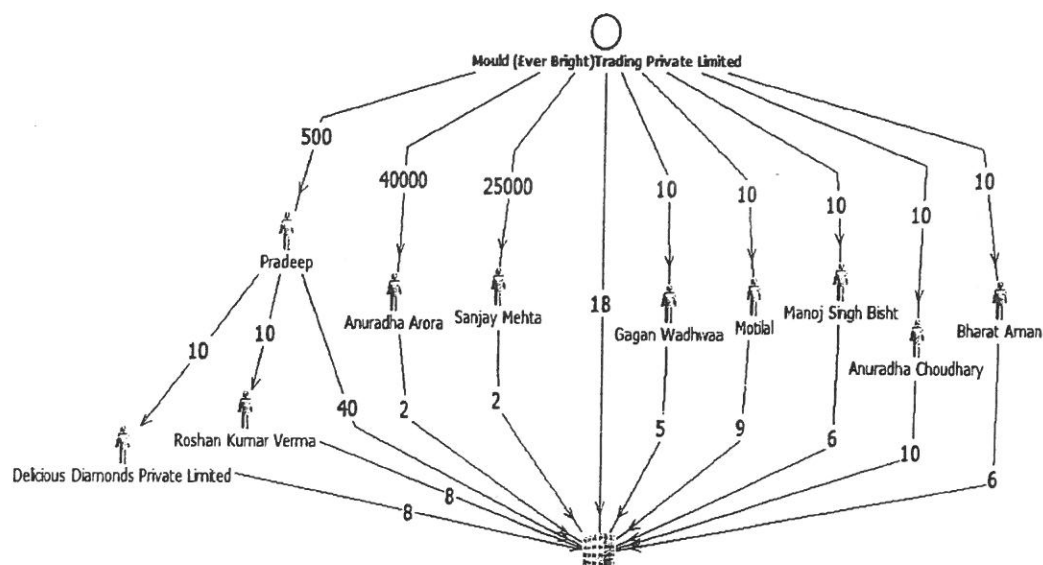




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- (j) The flow of shares from Ever Bright to above mentioned entities by way of offmarket transfer and the on-market sale of such shares by the said entities including Ever Bright as counterparties is depicted in the chart below.



Trades as counter party to top 10 LTP contributor's sales that had contributed to positive LTP in Market

- (k) Therefore investigation observed that these suspected entities who received such shares and Ever Bright were acting in concert to manipulate the price of the scrip. The entity Ever Bright, apart from selling shares on market in a fraudulent manner, aided and abetted other entities to follow similar pattern of trading by transferring its shares in offmarket to them.
- (l) Thus, investigation observed from the trading pattern that these entities were not acting as genuine sellers and had no bona fide intention to sell because in spite of sufficient buy orders being available in the market, they released very small quantity of shares in each transaction and performed not more than one transaction a day. By these trades, they matched the price of prevailing buy orders which were placed at a higher price than the last traded price and thus contributed to increased scrip price with each of their trades. In view of the repeated nature of such trades by these 15 entities, their culpability in increasing the price is thus established. From the above trading pattern, investigation further established that the intention of these entities was to mark the price higher and not merely to enter into the sale transactions carried out by them. Hence, investigation concluded that these 15 suspected entities belonging to Group-1,





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namely Aradhna Choudhary(Noticee No.3), Bharat Aman (Noticee No.5), Delicious Diamonds Private Limited (Noticee No.6), Gagan Wadhwa (Noticee No.7), Manoj Singh Bisht (Noticee No.10), Moti Lal (Noticee No.11), Ever Bright Trading Private Limited (earlier known as Mould Trading Private Limited) (Noticee No.12), Neetu Gupta (Noticee No.13), Pradeep (Noticee No.14), Roshan Kumar Verma (Noticee No.16), South Asia Portfolios Private Limited (Noticee No.18), Anuradha Arora (Noticee No.2), Sanjay Mehta (Noticee No.17), All Time Buildtech Private Limited(Noticee No.1) and B G Freight Shoppe India Private Limited (Noticee No.4) were acting in concert and contributed to manipulation in the scrip price and created a misleading appearance of trading in the scrip by such trades as explained above.

6. During the period from 12/12/2013 to 10/12/2014, investigation observed that out of 142 suspected entities belonging to 6 groups, 26 entities have traded and 9 entities belonging to Group-1 were observed to have bought shares and since this was a price rise period , LTP analysis was carried out on the buy side. Details of their trades are as follows:

[Table: 4]

Buyer PAN	Buyer Name	All trades			LTP Diff. > 0			LTP Diff. < 0			LTP Diff. = 0		% of positive LTP to Total Market positive LTP
		Sum of LTP diff	Sum of QTY	No. of trades	Sum of LTP diff	QTY traded	No. of trades	Sum of LTP diff	QTY traded	No. of trades	QTY traded	No. of trades	
AABC S5265 M	SOUTH ASIA PORTFOLIOS PRIVATE LIMITED	16.95	272	9	16.95	72	8	0.00	0	0	200	1	7.77
AAGH G493 9L	GIRRAJ KUMAR GUPTA HUF	9.65	15	3	9.65	15	3	0.00	0	0	0	0	4.42
AFCP G500 6P	RAJEEV KUMAR RAM PRASAD GUPTA	6.38	1105	29	6.38	141	21	0.00	0	0	964	8	2.93
AAIC M323 2F	MOULD TRADING PRIVATE LIMITED	2.80	3060624	10	2.87	822781	4	-0.07	1531550	2	706293	4	1.32
AESP G680 9H	GIRRAJ KUMAR JAGDISH PRASAD GUPTA	0.43	2431	11	0.43	2	2	0.00	0	0	2429	9	0.20
AAKC A0464 B	ALL TIME BUILDTECH PRIVATE LIMITED	0.00	1581200	3	0.01	508000	1	-0.01	545000	1	528200	1	0.01
AADC R609 2H	RAM ALLOY CASTINGS PRIVATE LIMITED	-0.04	8100000	4	0.01	1000000	1	-0.05	1200000	1	5900000	2	0.01
AACC B4250 A	B G FREIGHT SHOPPE INDIA PRIVATE LIMITED	-0.02	2487940	4	0.00	0	0	-0.02	1403400	2	1084540	2	0.00
AAAC T5615 M	TRENDZ INFORMATICS PRIVATE LIMITED	-0.01	1200000	1	0.00	0	0	-0.01	1200000	1	0	0	0
Total (9 suspected entities)		36.14	16433587	74	36.30	2331011	40	-0.16	5879950	7	8222626	27	16.64
Market Total		217.35	35551885	460	218.12	5903089	188	-0.77	13045468	21	16603328	251	100





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a) The 9 suspected entities belonging to Group-1 were observed to have contributed Rs. 36.14 to net LTP in 74 trades and Rs. 36.30 to positive LTP (16.64% to market positive LTP) in 40 trades.

b) The 5 Noticees viz South Asia Portfolios Private Limited (Noticee No.18), Girraj Kumar Gupta HUF(Noticee No.8), Rajeev Kumar Ram Prasad Gupta(Noticee No.15), Ever Bright Trading Private Limited (Noticee No.12) and Girraj Kumar Jagdish Prasad Gupta (Noticee No.9) together have contributed Rs. 36.28 (16.63%) to market positive LTP in 38 trades. It was observed that in all these 38 trades carried out by these entities that contributed to positive LTP, buy orders were placed first. It was also observed that out of these 38 trades, 28 trades were with 11 suspected entities belonging to Group 1 which contributed Rs. 24.46 (11.21%) to positive LTP.

c) The summary of 28 trades of suspected entities which contributed positive LTP by trading among themselves is given below:

[Table:5]

Buyer Name→ Seller Name↓	SOUTH ASIA PORTFOLIO S PRIVATE LIMITED - LTP contribution (No. of trades)	GIRRAJ KUMAR GUPTA HUF - LTP contribution (No. of trades)	RAJEEV KUMAR RAM PRASAD GUPTA - LTP contribution (No. of trades)	EVER BRIGHT TRADING PRIVATE LIMITED - LTP contribution (No. of trades)	GIRRAJ KUMAR JAGDISH PRASAD GUPTA - LTP contribution (No. of trades)	Total LTP as Seller (No. of Trades)
DELICIOUS DIAMONDS PRIVATE LIMITED	5.80 (3)	-	-	-	-	5.80 (3)
GAGAN WADHWA	2.10 (1)	-	-	-	-	2.10 (1)
PRADEEP	4.20 (2)	3.10 (1)	1.26 (4)	0.40 (1)	-	8.96 (8)
BHARAT AMAN	-	3.25 (1)	-	-	-	3.25 (1)
NEETU GUPTA	-	-	0.24 (1)	-	-	0.24 (1)
EVER BRIGHT TRADING PRIVATE LIMITED (earlier known as Mould Trading Private Limited)	-	-	2.00 (6)	-	0.23 (1)	2.23 (7)
ANURADHA ARORA	-	-	0.48 (2)	-	-	0.48 (2)
ALL TIME BUILDTECH PRIVATE LIMITED	-	-	0.57 (2)	-	-	0.57 (2)
SANJAY MEHTA	-	-	0.35 (1)	-	-	0.35 (1)
B G FREIGHT SHOPPE INDIA PRIVATE LIMITED	-	-	0.28 (1)	-	-	0.28 (1)
VINEET GUPTA	-	-	-	-	0.20 (1)	0.20 (1)
Total LTP as Buyer (No. of Trades)	12.10 (6)	6.35 (2)	5.18 (17)	0.40 (1)	0.43 (2)	24.46 (28)

d) It was observed from the above table that the aforesaid 5 suspected entities (buyers) i.e





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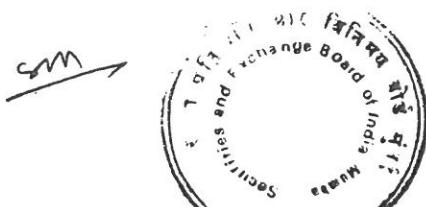
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SOUTH ASIA PORTFOLIOS PRIVATE LIMITED, GIRRAJ KUMAR GUPTA HUF, RAJEEV KUMAR RAM PRASAD GUPTA,, EVER BRIGHT TRADING PRIVATE LIMITED, and their 11 counter parties(sellers) belonging to Group-1 i.e DELICIOUS DIAMONDS PRIVATE LIMITED, GAGAN WADHWA, , PRADEEP, BHARAT AMAN, NEETU GUPTA , ALL TIME BUILDTECH PRIVATE LIMITED, ANURADHA ARORA, ALL TIME BUILDTECH PRIVATE LIMITED, SANJAY MEHTA, B G FREIGHT SHOPPE INDIA PRIVATE LIMITED, VINEET GUPTA (Noticee no.19) made substantial contribution of Rs. 24.46 (11.21%) to positive LTP by trading among themselves and manipulated the price of scrip. Details of the trades are enclosed as Annexure-12.

7. Based on the above, it is alleged that by indulging in trades that resulted in manipulation of the price of the scrip and by indulging in a trading pattern which created misleading appearance of trading in the scrip, Noticee no.1 to 19 viz (1) All Time Buildtech Private Limited, (2) Anuradha Arora, (3) Aradhna Choudhary, (4) B G Freight Shoppe India Private Limited, (5) Bharat Aman, (6) Delicious Diamonds Private Limited, (7) Gagan Wadhwa, (8) Girraj Kumar Gupta HUF, (9) Girraj Kumar Jagdish Prasad Gupta, (10) Manoj Singh Bisht, (11) Moti Lal, (12) Ever Bright Trading Private Limited (earlier known as Mould Trading Private Limited), (13) Neetu Gupta, (14) Pradeep, (15) Rajeev Kumar Ram Prasad Gupta, (16) Roshan Kumar Verma, (17) Sanjay Mehta, (18) South Asia Portfolios Private Limited and (19) Vineet Gupta (hereinafter referred to as noticees) have violated Regulation 3(a), (b), (c), (d) and Regulation 4(1), 4(2) (a), (e) of SEBI (PFUTP) Regulations, 2003.

8. Noticee no.1 to 19 are, therefore, called upon to show cause as to why suitable directions u/s 11(1), 11(4) and 11B of SEBI Act, 1992 should not be issued against them. This show cause notice is without prejudice to right of SEBI to take any other action as it deems fit in accordance with law.

9 The noticees' reply to the show cause notice, together with supporting documents, if any, that noticees may choose to rely upon in support of their reply, should reach the undersigned, at the address given below, as well as through email at somam@sebi.gov.in and nitinh@sebi.gov.in within **21 days** from the date of receipt of this show cause notice.





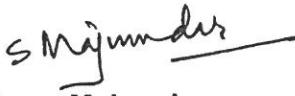
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SEBI Bhavan
Plot No. C4-A, "G" Block,
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051

10. In case the noticees fail to provide any reply, it shall be construed that noticees have no reply to submit and SEBI shall proceed to take action against the noticees in terms of the provisions of SEBI Act and in accordance with law. In case, the noticees are desirous of a personal hearing before the Whole Time Member, the same may also be intimated in the reply.

11 The noticees are also advised to keep SEBI informed about the change in your correspondence address, if any, till the proceedings are complete.


Soma Majumder
General Manager



List of Annexures

- Annexure-A** Details of 6 distinct group of suspected entities
- Annexure-1** Details of price and volume of Ram Minerals
- Annexure -2** Details of allotment of shares for Ram Minerals and chemicals ltd
- Annexure -4** Demat statement of Ram Alloy Casting Pvt Ltd
- Annexure -5** Bank Account statement for All time buildtech private ltd
- Annexure -6** Details of block deals
- Annexure -7** Demat statement of B G Freight Shoppe
- Annexure -8** Bank statement and counter party details of Mould trading private limited
- Annexure -9** Master data from MCA for Delicious diamonds private ltd
- Annexure -10** UCC details obtained from BSE and off-market transfers
- Annexure -11** Last Trade Price (LTP) variation analysis on suspected entities
- Annexure -12** Details of these trades suspected entities
- Annexure -14** Demat statement of Shri ji Sales Corporation & Selection overseas
- Annexure -16** Transaction statements from depositories (NSDL/CDSL)
- Annexure -17** Trading for providing long term capital gain entry to the beneficiaries
- Annexure -18** Bank Account statement for Shri Salasar Trading Co
- Annexure -19** MCA details of Gopayl Biyala & Sanjeev kumar sharma
- Annexure -20** List of Shareholders and shareholding details as per RTA statment