

**BEFORE THE RECOVERY OFFICER**

**SECURITIES AND EXCHANGE BOARD OF INDIA**

**ORDER**

**In respect of representation received from Rich Infra Developers India Limited  
in the matter of e-auction of immovable properties of Rich Infra Developers  
India Limited under Recovery Certificate No. 2823 of 2020**

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**BACKGROUND:**

1. Securities and Exchange Board of India (SEBI) vide final order dated September 27, 2018 directed Rich Infra Developers India Limited (AAFCR3888R) and its directors namely Harvinder Pal Singh (ABPPS4178P), Gurpreet Singh Sidhu (ATAPS7417G), Parampreet Singh Sidhu (BCWPS1318C) and Baljinder Preet Singh (BBJPS5825E) (hereinafter referred to as “**Defaulters**”) to wind up existing Collective Investment Schemes and refund the money collected by it under the schemes, with returns which are due to the investors as per the terms of offer.
2. It may be noted that before the passing of the aforesaid final order, on the basis of *prima facie* findings, SEBI had passed an interim order dated March 31, 2015 against the Defaulters directing them to *inter alia* submit the details of the schemes, investors etc., not collect any fresh money from investors under its existing schemes, not to dispose of or alienate any of the properties/assets obtained directly or indirectly through money raised under the schemes, etc.
3. Since the Defaulter failed to refund the monies, as directed by the aforesaid order, Recovery proceedings have been initiated under Section 28A of the Securities and Exchange Board of India Act, 1992, (“**SEBI Act**”) against the Defaulters under Recovery Certificate No. 2823 of 2020 dated February 5, 2020. A Notice of Demand dated February 5, 2020 was issued to the Defaulter, directing them to make the payment of the **58,45,00,000** /- together with returns due to investors, further interest, all costs, charges and expenses incurred in respect of all the proceedings taken for recovery of the said sum, within 15 days and vide Notices of Attachment dated February 5, 2020, the bank/demat

accounts and mutual fund folios of the Defaulters were also attached. The Defaulter failed to pay the dues and the amount available in the bank/demat accounts of the Defaulter was insufficient to pay the entire dues.

4. Therefore, information and documents related to immovable properties of the defaulters were sought from the Inspector General of Registration and Stamps (IGRS), of various states. On the basis of the information received, the Recovery Officer, SEBI issued Prohibitory Orders dated June 9, 2023 and May 18, 2026 under section 28A of SEBI Act, 1992 read with Rule 16 and 48 of the Second Schedule of the Income-tax Act, 1961, attaching the immovable properties of the Defaulters, as mentioned in said Orders. The Defaulters were also prohibited from disposing, transferring, alienating or charging any immovable property held by them and were further directed to furnish complete details of all the movable and immovable properties held by them.
5. In order to refund the money due to the investors, the Recovery Officer proceeded with the valuation and auction of the attached properties. Accordingly, Notice for settling a sale proclamation dated June 10, 2026 was issued and sent on the last known addresses of the Defaulters by post. However, the same return undelivered. Thereafter, Notice of Sale for e-auction dated June 12, 2026 (read with Corrigendum dated July 03, 2026) was issued with respect to properties of the Defaulters, as mentioned below, and the same was published on June 14, 2026 in newspapers.

| SI No | Description of the property                                                                                                                               | Area           | Reserve Price (in Rs.) |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------|
| 1     | Land situated at Shengaon Village, Chandrapur Taluk, Maharashtra – 442505 (Survey nos. 668/659/680/ 2/53 & 668/659/ 680/ 2/55)                            | 335 Sq Mts     | 4,82,400               |
| 2     | Land situated at Savali Bujurg Village, Karanja Taluka, Wardha, Maharashtra-442201 (Survey nos. 213/1/218/1, 213/1/218/5,213/1/218/10 & 213/1/218/17)     | 3782.16 Sq mts | 78,12,051              |
| 3     | Land situated at Sabkund Village, Katol Taluka, Nagpur, Maharashtra – 441103 (Survey nos. 47, 58, 59, 60, 75/2, 78/1, 78/3, 80, 82, 83, 84, 85, 86 & 113) | 1.48 Hectare   | 15,67,100              |
| 4     | Land situated at, Kadoli Village, Patan, Taluk, Satara District, Maharashtra State- 415206 (Survey No. 3 & 4/5)                                           | 19.41 Acres    | 49,50,000              |
| 5     | Land situated at Khot Village, Garhshankar Tehsil, Hoshiarpur District, Punjab- 144527                                                                    | 56.40 Acres    | 1,80,90,000            |

## **REPRESENTATION OF THE APPLICANT**

6. On July 01, 2026, SEBI received a representation dated June 24, 2026 from Rich Infra Developers India Limited (hereinafter referred to as “**Applicant**”), challenging the valuation and fixation of reserve price of the land situated at *Village Kot, Tehsil-Garhshankar, District-Hoshiarpur, Punjab (property at Sr. no. 5 of the Notice of Sale dated June 12, 2026)*. The challenge of the applicant pertaining to the valuation is mainly based on the valuation report of a Govt. registered valuer dated October 05, 2017 wherein the market value of the property situated in Kot Village consisting of 67.61875 acres has been accessed to be Rs 17,58,08,750/-. Further it has been also claimed that the property is situated on Garhshankar- Nangal Road and the eastern boundary of the said property abuts the said road. It has been contended that the property is enjoying the good location and the reserve price fixed by SEBI is not commensurate with the land classification, location and the circle rate.
7. In view of the above, the applicant has requested the following-
  - a. To provide clarifications and disclosures pertaining to the details of the SEBI Empaneled valuer of the said property, copy of the valuation report, policy basis for the reserve price, collector/circle rate consideration, correctness of the land classification and area mapping;
  - b. To take on record and consider the collector/circle rate schedule for 2025-26 and consideration of the prior independent valuations of the said property;
  - c. To defer/reschedule the proposed auction pending examination of the impugned representation and the supporting valuation material;
  - d. To direct a fresh valuation or supplementary valuation review by a SEBI-empaneled valuer after considering the aforesaid;
  - e. To re-fix the reserve price at a fair and realistic level in accordance with SEBI’s stated procedure and applicable policy, in order to maximize realization of proceeds, in the interest of investors’;
  - f. To issue a fresh proclamation/auction notice with adequate time for participation after the reserve price is correctly determined; and

- g. To provide the defaulter with a short hearing or meeting, whether virtual or physical before the auction is proceeded with.

**PERSONAL HEARING:**

- 8. Considering the above, an opportunity of Personal Hearing on July 10, 2026, before the Recovery Officer, SEBI, was granted to the Applicant. The notice of hearing dated July 03, 2026 was sent to the Applicant via the below mentioned modes.
  - a. vide e-mail dated July 10, 2026, on the email id [info@richinfra.com](mailto:info@richinfra.com) ;
  - b. vide post at the address mentioned on the representation of the Applicant i.e *SCO 144-145, 3rd Floor, Sector 34A, Chandigarh, 160022*; and
  - c. vide hand delivery on the aforesaid address.
- 9. However, the Applicant could not be contacted. The email had bounced, the physical post returned undelivered and while trying the hand delivery it was informed that the Applicant does not operate from the aforesaid address.

**CONSIDERATION OF ISSUES:**

- 10. I have carefully perused the documents available on record, the valuation report of the IBBI registered valuer dated June 2, 2026, the objections raised by the Applicant. After examining the above, issues for consideration in the instant matter are:
  - a. Whether the reserve price of the property in question, fixed on the basis of valuation report dated June 02, 2026, is reasonable?
  - b. Whether the valuation report submitted by the Applicant is reliable and the same is backed by any reasonable documentary evidence so as to change the reserve price already fixed?
- 11. That the valuation of the property in question, on the basis of which the reserve price has been fixed, has been conducted by an Insolvency and Bankruptcy Board of India (“IBBI”) registered valuer. The total land extent considered for valuation is 444 Kanals 19 Marlas, equivalent to *approximately 56.40 Acres*. This total land extent has been arrived at after taking into account the lands in

the registered sale deeds which are also reflected in land revenue records, in the name of Rich Infra Developers India Limited.

12. The valuation report mentions that the aforesaid 56.40 Acres of land are classified either as 'Agricultural-Burani' or 'Gair Mumkin Pahar' in the respective sale deeds and the same classification is also indicated in the land revenue records of the State Government. No land conversion documents were available while valuing the said property. The valuer has not made any assumptions regarding the change of land use or future development potential while arriving at the valuation, as the property is being sold on "As Is Where Is" basis. The details of the classification of the said property are as follows:

| <b>Sale Deed No.</b> | <b>Land Classification</b> | <b>Extent (Acres)</b> |
|----------------------|----------------------------|-----------------------|
| 900                  | Agricultural-Burani        | 3.73                  |
| 1687                 | Agricultural-Burani        | 1.10                  |
| 2007                 | Gair Mumkin Pahar          | 11.35                 |
| 2907                 | Gair Mumkin Pahar          | 8.10                  |
| 843                  | Gair Mumkin Pahar          | 8.10                  |
| 289                  | Gair Mumkin Pahar          | 9.10                  |
| 2726                 | Gair Mumkin Pahar          | 4.10                  |
| 2152                 | Gair Mumkin Pahar          | 8.10                  |
| 901                  | Gair Mumkin Pahar          | 2.73                  |

13. It is noted that the said IBBI registered valuer has arrived at the Guideline Value of the aforesaid property on basis of the land classification details in the aforesaid sale deeds, land revenue records and the Guideline Rates for FY 2025-26 as published by the Government of Punjab.
14. The reserve price of the property in question has been fixed after taking into account the Guideline Value and the Market Value of the said property.
15. It is further noted from the valuation report of the said IBBI registered valuer, that the Market Value of the property has been arrived at by using the Sales Comparison Method Approach, wherein market evidence available in the surrounding locality was analyzed after considering previous sale transactions

of comparable lands situated in and around the vicinity of the property in question. The adopted market rates were arrived at after considering the following factors, namely, -

- a. Nature and classification of land;
- b. Shape, size, frontage and its ratio to depth;
- c. Existing physical characteristics of the property;
- d. Accessibility and marketability of similar lands in the locality; and
- e. Current demand and supply conditions prevailing in the local market.

16. It is observed from the valuation report of the IBBI registered valuer, that only 4.83 Acres of land is classified as 'Agricultural-Burani', while the rest of the property is classified as 'Gair Mumkin Pahar', which as per the said valuation report, comprises of sloping and uneven terrain with rocky patches with no physical ground demarcation. Such physical characteristics reduce the effective usability of the property in question when compared to normal level agricultural land.

17. That as per the IBBI registered valuer, the property in question consists of multiple survey numbers, and no exclusive survey sketch or authenticated layout identifying the access or contingency or precise boundaries of the said property were available during the course of valuation.

18. That, as per the said IBBI registered valuer, considering these existing physical characteristics and documentary limitations, the marketability of the subject property is comparatively lower than a fully demarcated, level agricultural parcel having clear physical boundaries and established access.

19. That, as per the said IBBI registered valuer, valuation has been carried out on an "As Is Where Is" basis considering the:

- a. actual physical condition of the property existing as on the date of inspection; and
  - b. documents made available;
- without assuming any benefit or restriction that could not be independently verified.

20. Accordingly, the said IBBI registered valuer, has assessed the Market Value and Guideline Value of the property in question (56.4 Acres), as mentioned in the table below.

|                        |                   |
|------------------------|-------------------|
| <b>Market Value</b>    | Rs. 2,01,00,000/- |
| <b>Guideline Value</b> | Rs. 1,72,10,225/- |

21. The reserve price of Rs. 1,80,90,000/- has been fixed at the Realizable Value, which is 90% of the Market Value. This is also higher than the Guideline Value.

22. With regards to the valuation report dated October 5, 2017, submitted by the Applicant, it is noted that the valuer of the Applicant, values a total of 540 Kanals - 19 Marlas of land, which is equivalent to 67.61875 Acres. Whereas, the valuation report of the IBBI registered valuer, basis which the reserve price has been fixed, values a total of 444 Kanals - 19 Marlas of land, equivalent to approximately 56.40 Acres (*a difference of 11.21875 Acres*).

23. That the valuation report submitted by the Applicant values the property at Rs. 17,58,08,750/-; with a forced sale/distress sale value at Rs. 15,82,27,870/-.

24. That as per the valuation report submitted by the Applicant, the property in question is situated on Garhshankar- Nangal Road and the eastern boundary of the said property abuts the said road. However, as per the site inspection conducted by the said IBBI registered valuer, it is difficult to identify the boundaries of the said property and the access to the said property is through mud road. Further, the Applicant has not provided any survey maps showing road access and as already stated above, the hearing notice to the Applicant has been returned undelivered.

25. That the valuer of the Applicant specifies the property in question as 'Agricultural/Mixed use land'. At the outset it is noted that this land classification is not supported by the sale deeds and the land revenue records. Further, the Applicant has also not furnished any land conversion orders with their representation to support the aforesaid claim on land classification. Furthermore, the valuer of the Applicant, has also not provided the details of the land use in the separate particular fields and answered the same as 'not applicable'.

26. The valuation report submitted by the Applicant mentions that the prevalent market rate has been arrived at on basis of 'market survey and local enquiries'. It does not provide any details regarding the exact valuation methodology, the basis or documentary evidence considered for the valuation of the property in question.
27. In view of the above, the following are noted about the valuation report and representation submitted by the Applicant:
- a. The valuation, conducted by a valuer in 2017, in itself, cannot be treated reliable for the auction to be conducted in 2026;
  - b. As indicated above, the valuation report cannot be safely relied upon because it lacks essential transparency and supporting evidence. Specifically, the report fails to provide the exact methodology or valuation models used to arrive at the valuation of the property;
  - c. The conclusions in the valuation report submitted by the Applicant stand as mere assertions until verifiable by facts; and
  - d. That the Applicant can neither be contacted for personal hearing, despite varied efforts nor has the Applicant cooperated during the recovery process.
28. On the other hand, the valuation conducted by the IBBI registered valuer was at the request of SEBI for the purpose of recovery under Section 28A of the SEBI Act. The said valuation has been carried out independently after considering the registered ownership documents, land classification recorded in the sale deeds and land revenue records, physical inspection, prevailing Government Guideline Rates, comparable market transactions, existing market conditions and the actual marketability of the property in question.
29. Accordingly, the Market Value, as arrived by the IBBI registered valuer, for fixing the reserve price, represent the prevailing market conditions as on the valuation date and reflect the fair market value of the property considering its existing condition. Consequently, the valuation report of the IBBI registered valuer has been relied upon, which is far more comprehensive, backed by mathematical and documentary evidences, for fixing the reserve price of the property in question.

**ORDER:**

30. In view of the above, I find that the objections of the Applicant are without any merit and there is no reason for either conducting a fresh valuation or deferring the auction, of the property in question. The auction of all the properties including the property situated at Khot Village, Garhshankar Tehsil, Hoshiarpur District, Punjab- 144527, shall be conducted as per the reserve price already published vide Notice of Sale dated June 12, 2026 read with Corrigendum dated July 03, 2026. The representation of the Applicant dated June 24, 2026 is accordingly disposed of.

31. A copy of this Order is to be served on the Applicant.

Date: July 17, 2026

Place: Delhi

RAJAN  
KUMAR

Digitally signed by  
RAJAN KUMAR  
Date: 2026.07.17  
21:07:03 +05'30'

**Rajan Kumar**  
**Recovery Officer**