BEFORE THE ADJUDICATING OFFICER

SECURITIES AND EXCHANGE BOARD OF INDIA

[ADJUDICATION ORDER NO. EAD-2/AO/ 148 - 168/2013]

UNDER SECTION 15 I OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992 READ WITH RULE 5 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROCEDURE FOR HOLDING INQUIRY AND IMPOSING PENALTIES BY ADJUDICATING OFFICER) RULES, 1995.

In respect of

1. **Scope Vyapar Private Limited (PAN: AAICS6023N)**
2. **Signet Vinimay Private Limited (PAN: AAMCS1712Q)**
3. **Sankalp Vincom Private Limited (PAN: AAMCS1711P)**
4. **Runicha Merchants Private Limited (PAN: AAECR0580M)**
5. **Anushree Trade Link Private Limited (PAN: AADCA9333L)**
6. **Swaranganga Trading Private Limited (PAN: AAFCS4794P)**
7. **Shurbhi (PAN: CEQPS7512M)**
8. **Anushikha Investments Pvt. Ltd.**
9. **Vibgyor Financial Services Pvt. Ltd (PAN: AAACV8378B)**
10. **Amrits Sales Promotion Pvt. Ltd.**
11. **Sakhi Barter Pvt. Ltd. (PAN: AADCS7666N)**
12. **Vinod Agarwal (PAN: AAVPA5327M)**
13. **Vikash Viniyog Pvt. Ltd.**
14. **Pawan Bhimsaria (PAN: AEAPB1005J)**
15. **BNK Investment Services Pvt. Ltd. (PAN: AABCB6403E)**
16. **D M Trading Pvt. Ltd. (PAN: AAACD9155A)**
17. **Norfiox Vincom Pvt. Ltd.**
18. **Swagatam Marketing Pvt. Ltd. (PAN: AAECS7264B)**
19. **J. V. Stock Broking Pvt. Ltd. (PAN: AABCJ1783D)**
20. **Rohini Mercantiles Pvt. Ltd.**
21. **Mangalchand Property & Investments Pvt. Ltd. (PAN: AABCM8407H)**

In the matter of

Rich Universe Network Limited

Background

1. The Securities and Exchange Board of India (hereinafter referred to as 'SEBI') conducted an investigation into the alleged irregularity in trading in the shares of Rich Capital and Financial Services Ltd now known as Rich Universe Network Limited (hereinafter referred to as 'RUNL') and into possible violation of the provisions of the Securities and Exchange Board of India Act, 1992 ('hereinafter referred to as SEBI Act') and various rules and regulations made there under for the period from February 01, 2010 to September 24, 2010 (hereinafter referred to as "Investigation Period").

2. The investigation inter-alia revealed that the scrip of RUNL opened at Rs 56.75 on February 01, 2010, reached a high of Rs 119.90 on September 02, 2010 and closed at Rs 111.80 on September 24, 2010 with abnormal volume during the investigation period. A group of entities, connected to each other one way or the other, namely 1. Scope Vyapar Pvt. Ltd., 2. Signet Vinimay Pvt. Ltd., 3. Sankalp Vincom Pvt. Ltd., 4. Runicha Merchants Pvt. Ltd., 5. Anushree Trade Link Pvt. Ltd., 6. Swarn Ganga Trading Pvt. Ltd., 7. Ms. Shurbhi, 8. Anushikha Investments Pvt. Ltd., 9. Vibgyor Financial Services Pvt. Ltd., 10. Amrits Sales Promotion Pvt. Ltd., 11. Sakhi Barter Pvt. Ltd., 12. Vinod Agarwal, 13. Vikash Viniyog Pvt. Ltd., 14. Pawan Bhimsaria, 15. BNK Investment Services Pvt. Ltd., 16. D M Trading Pvt. Ltd., 17. Norfiox Vincom Pvt. Ltd., 18. Swagatam Marketing Pvt. Ltd., 19. J. V. Stock Broking Pvt. Ltd., 20. Rohini Mercantiles Pvt. Ltd. and 21. Mangalchand Property & Investments Pvt. Ltd. (hereinafter referred to as the Noticee No.1 to 21 respectively and collectively referred to as "the Noticees") entered into off market transactions in large quantities of RUNL shares on the one side and executed reversal / circular / synchronized trading among themselves in the market thereby created artificial volume and false / misleading appearance of trading. They also executed synchronized trades at incrementally higher prices to create artificial price rise in the scrip of RUNL.

3. The Noticees therefore allegedly violated the provisions of regulation 3 (a) to (d), 4 (1) and 4 (2) (a) & (g) of the SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (hereinafter referred to as 'PFUTP Regulations').

Appointment of Adjudicating Officer:

4. In view of the above, SEBI appointed the undersigned as Adjudicating Officer under section 15 I of the SEBI Act, read with rule 4 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 (hereinafter referred to as ‘Rules’) vide order dated May 08, 2012, to inquire into and adjudge the alleged violations by the Noticees under section 15HA of the SEBI Act.

Show Cause Notice, Reply of Noticees and Hearing:

5. A common Notice dated June 19, 2012 (herein after referred to as “SCN”) was issued to the Noticees under rule 4(1) of the Rules to show cause as to why an inquiry be not held against them and penalty be not imposed under section 15 HA of the SEBI Act for the aforesaid violations of PFUTP Regulations allegedly committed by them. The text of the said provisions of law is reproduced hereunder;

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 thereunder;
(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 thereunder.

4. Prohibition of manipulative, fraudulent and unfair trade practice

(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;
(g) entering into a transaction in securities without intention of performing it or without intention of change of ownership of such security;

6. The Noticees except Noticee No. 8 & 20 submitted their reply to the SCN. After considering the replies submitted by the Noticees, for the purpose of inquiry, opportunities of hearing were granted to them on September 24 -25, 2012 by notice dated September 06, 2012. The Noticee No. 1 to 6, 11 & 18 or their authorized representative appeared before me and made oral submissions. Another opportunity of personal hearing was granted to the remaining Noticees on October 15, 2012 and Noticee No. 10, 15, 16, 19 & 21 or their authorized representative appeared before me and made oral submissions. Noticee No. 12 availed the opportunity of hearing on November 20, 2012. Noticee No. 7-9, 13, 14, 17 & 20 neither turned up for the hearing nor entered into any correspondences in this regard.

7. The dates of reply, hearing notice, appearance by the Noticees are tabulated as below.

Noticee No.	Reply:	Hearing Notice	Appearance for personal Hearing
1	September 21, 2012	September 06, 2012	September 24, 2012
2	September 21, 2012	September 06, 2012	September 24, 2012
3	September 21, 2012	September 06, 2012	September 24, 2012
4	September 21, 2012	September 06, 2012	September 24, 2012
5	September 21, 2012	September 06, 2012	September 24, 2012
6	September 21, 2012	September 06, 2012	September 24, 2012
7	July 17, 2012	September 26, 2012	No appearance
8	No reply	September 06, 2012 September 26, 2012	No appearance No appearance
9	October 15, 2012	September 06, 2012 September 26, 2012	No appearance No appearance
10	July 18, 2012	September 06, 2012 September 26, 2012	No appearance October 15, 2012
11	October 16, 2012	September 06, 2012	September 25, 2012
12	July 11, 2012	September 26, 2012 October 30, 2012	No appearance November 20,2012
13	July 09, 2012 & October 12, 2012	September 06, 2012 September 26, 2012	No appearance No appearance
14	September 18, 2012, October 12, 2012,	September 06, 2012 September 26, 2012	No appearance No appearance

15	July 23, 2012	September 26, 2012	October 15, 2012
16	July 25, 2012 & Another one dtd nil.	September 06, 2012 September 26, 2012	No appearance October 15, 2012
17	July 10, 2012 October 12, 2012	September 06, 2012 September 26, 2012	No appearance No appearance
18	July 11, 2012	September 06, 2012	September 24, 2012
19	July 23, 2012	September 26, 2012	October 15, 2012
20	No reply filed	September 06, 2012 September 26, 2012	No appearance No appearance
21	September 03, 2012	September 06, 2012 September 26, 2012	No appearance October 15, 2012

8. I am of the view that ample opportunities have been granted to the Noticees to meet the principle of natural justice; I am proceeding with the inquiry based on the written/ oral submissions, material and documents as available on record.

9. The Noticees in general denied the allegations as per the SCN and inter – alia submitted that they did not manipulate the shares of RUNL by way of circular/reversal/synchronized trading. The entire grouping of so many unrelated/unconnected entities is erroneous and based on surmise only. They have no intention to manipulate the shares of RUNL as alleged, and the alleged transactions were executed for investment only or for raising funds. The off-market transactions do not affect the price and volume of RUNL. During the said transaction, they have incurred loss and no unfair gain was made by them. The transaction was executed on the automated platform of the stock exchange whereby anonymity of the buyer and seller is maintained and therefore, circular/synchronized trading cannot take place.

Consideration of Issues and Finding:

10. After taking into account the allegations, replies of the Noticees and other evidences/material available on records, I hereby, proceed further to inquire the case on merit. The issues that arise for consideration in the present case are as under:

a. Whether the Noticees have violated Regulation 3 (a) to (d), 4 (1) and 4 (2) (a) & (g) of the PFUTP Regulations?
b. Whether the Noticee is liable for monetary penalty prescribed under Section 15 HA of the SEBI Act for the aforesaid violation?
c. If yes, what should be the quantum of monetary penalty?

11. It has been alleged in the SCN that the Noticees were related to each other in one way or other by way of common address, common directors and / or parties to off-market transactions and reversal of the same through market transactions in a circular fashion. I find from Annexure II to the SCN that as per KYC, the Noticee No. 1 to 6 have common address i.e. Address: 23/1, Principal Khudiram Bose Road Kolkata-700006 and has common Directors namely- Mr. Pradip Dey and Abhiset Basu. The Noticee No. 1 to 6, have not disputed the same. It is pertinent to note that the contents of the replies of the Noticee No. 1 to 6 are identical, and authorization of the same person to appear for them during the hearing, and the authority letter was signed by the same person who is a common director of the said Noticees.

12. I find from Annexure IV to VI of the SCN that Noticees No 7 to 21 received large quantity of shares of RUNL by way of off-market transfer from the group of Noticee No. 1 to 6. Noticee No 7 to 21 sold the shares so received in off market, by way of synchronized trades to group of Noticee No 1 to 6 on the same day or immediately within few days thereafter. The details of transactions are not in dispute. The fact cannot be ignored that, generally, the off -market transactions are entered into between the entities who are in some way known to each other or are related/connected in some manner. The reversal of the off market transactions immediately through synchronized market transactions to the same set of entities, following similar pattern of trading during a short period i.e. February – March 2010 establishes that the Noticees are connected to each other one way or the other.

13. I find from the available records that the scrip of RUNL opened at Rs 56.75 on February 01, 2010, reached a high of Rs 119.90 on September 02, 2010 and closed at Rs 111.80 on September 24, 2010 with abnormal volume. Noticee No. 1 purchased 18,81,373 shares in the market which accounted for 17.79%

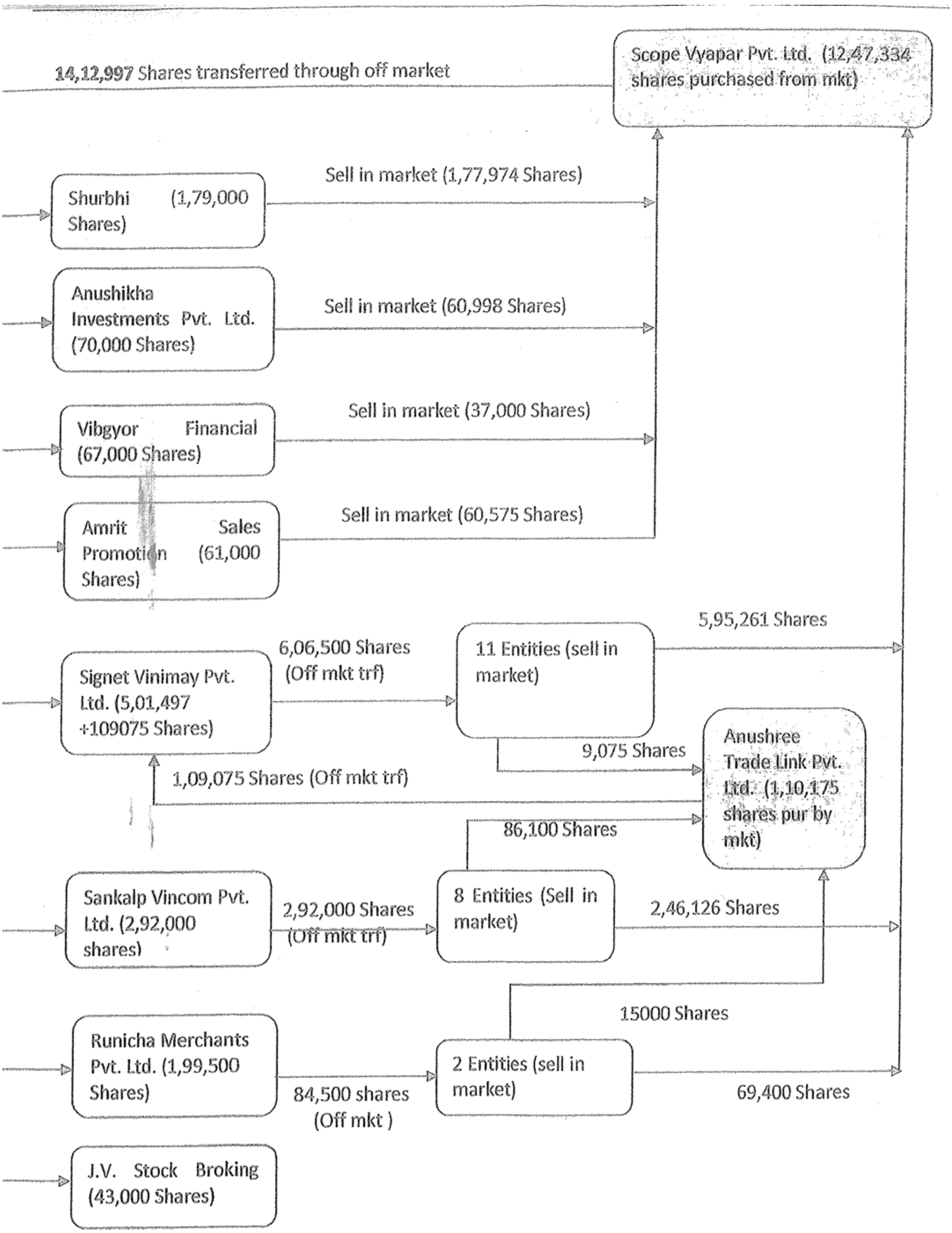
of the total market volume and sold 3850 shares. The Noticee No. 1 transferred 17,10,397 shares to various other Noticees and received 48476 shares from them in the off market. It is pertinent to note that Notice No. 2 to 4 executed significantly large quantities of off market transfers to and from the other group entities. Significant part of the off market transfers and the market transactions executed amongst the Noticees were within a period of one month viz. February to March 2010. The Noticee No. 1 to 21 purchased and sold shares in off- market as well as on market as detailed below:

Name of the Entities	**Market Trades (Qty)**		**Off Market Trades (Qty)**	
	Buy	**Sell**	**Received**	**Transfer**
Scope Vyapar Pvt. Ltd.	18,81,373	3,850	48,476	17,10,397
Signet Vinimay Pvt. Ltd.	0	0	9,74,572	9,26,672
Sankalp Vincom Pvt. Ltd.	0	0	4,10,000	3,65,104
Runicha Merchant Pvt. Ltd.	0	0	2,78,000	2,58,000
Anushree Trade Link Pvt. Ltd.	1,34,075	0	8,136	1,34,075
Swarn Ganga Trading Pvt. Ltd.	3,000	0	0	3,000
Sakhi Barter Pvt. Ltd		215000	215000	
Vinod Agarwal		99922	100000	
Vikas Viniyog Pvt. Ltd		59900	60000	
Pawan Bhimsara		114900	115500	
BNK Investment Services Pvt. ltd.		23975	25000	
D M Trading Pvt. Ltd.		20000	20000	
Norflox Vincom Pvt. Ltd.		59850	60000	
Swagatam Marketing Pvt. Ltd.		50000	50000	
J V Stock broking P. ltd		91540	50000	
Rohini Mercantile Pvt. Ltd		39850	40000	
Mangalchand Properties & Investment Ltd.		49900	50000	
Shurbhi		177974	179000	
Anushika Investment Pvt. Ltd.		51098	70000	
Vibgyor Financial Services Pvt. ltd.		37000	67000	
Amrits Sales Promotion Pvt. Ltd.		60575	61000	

14. For illustrative purpose, the date wise details of transfer of shares through off market to some of the other Noticees by Noticee No. 1 are given as under:

Execution Date (off market)	Signet Vinimay Pvt. Ltd.	Sankalp Vincom Pvt. Ltd.	Runicha Merchants Pvt. Ltd.	Shurbhi	Anushikha Investments Pvt Ltd	Vibyyor Financial Services Pvt. Ltd.	Amrit Sales Promotion Pvt. Ltd.	Ashiyana Mercantile Pvt. Ltd.	J.V.Stock Broking Pvt.Ltd.	Grand Total
10-02-2010		100000								100000
17-02-2010	88000									88000
18-02-2010	7500									7500
19-02-2010	15500									15500
23-02-2010	32700							24000		56700
24-02-2010		50000						24000		74000
25-02-2010	85000	75000								160000
02-03-2010									20000	20000
03-03-2010			25000			30000				55000
05-03-2010						13000				13000
08-03-2010	30000		25000		70000	24000			23000	172000
10-03-2010	13000									13000
11-03-2010	72925						29000			101925
12-03-2010			57000				32000			89000
16-03-2010	36368									36368
17-03-2010	32504									32504
18-03-2010			46000							46000
19-03-2010	35000		12000							47000
20-03-2010			25000							25000
22-03-2010			9500							9500
24-03-2010	20500									20500
25-03-2010		53500								53500
26-03-2010	25000									25000
27-03-2010	7500	13500								21000
26-08-2010				100000						100000
30-08-2010				79000						79000
Grand Total	**501497**	**292000**	**199500**	**179000**	**70000**	**67000**	**61000**	**48000**	**43000**	**1460997**

15. A pictorial presentation of some of the transactions are given below: It is seen, for example, Noticee No. 2 (Signet Vinimay Pvt. Ltd.) received 6,10,572 shares from the Noticee No.1 &. 5, and it transferred 6,06,500 shares to 11 entities through the off market. The said facts are not disputed by the Noticees.



14,12,997 Shares transferred through off market
Scope Vyapar Pvt. Ltd. (12,47,334 shares purchased from mkt)
Shurbhi (1,79,000 Shares)
Sell in market (1,77,974 Shares)
Anushikha Investments Pvt. Ltd. (70,000 Shares)
Sell in market (60,998 Shares)
Vibgyor Financial (67,000 Shares)
Sell in market (37,000 Shares)
Amrit Sales Promotion (61,000 Shares)
Sell in market (60,575 Shares)
Signet Vinimay Pvt. Ltd. (5,01,497 +109075 Shares)
6,06,500 Shares (Off mkt trf)
11 Entities (sell in market)
5,95,261 Shares
9,075 Shares
Anushree Trade Link Pvt. Ltd. (1,10,175 shares pur by mkt)
1,09,075 Shares (Off mkt trf)
86,100 Shares
Sankalp Vincom Pvt. Ltd. (2,92,000 shares)
2,92,000 Shares (Off mkt trf)
8 Entities (Sell in market)
2,46,126 Shares
15000 Shares
Runicha Merchants Pvt. Ltd. (1,99,500 Shares)
84,500 shares (Off mkt)
2 Entities (sell in market)
69,400 Shares
J.V. Stock Broking (43,000 Shares)

16. I find from Annexure VI to the SCN that the Noticees indulged in circular/reversal trading which were manipulative in nature as almost same number of shares received in off- market mechanism was sold by them in market and the counter parties to the transaction are again the same set of group entities. I note that out of the 14,12,997 shares transferred through off market by Noticee No 1, Noticee 1 & 5 together purchased 13,57,509 shares through market with the same set of entities as counter parties. These transaction are reversal in nature between the Noticees (off-market as well as market), which accounted for 96.07% of the total 14,12,997 shares. The trades among the Noticees accounted for 33.40 % of the total traded day's average market volumes during the investigation period. The transactions did not result into meaningful change of ownership, but was with the intention to create misleading appearance of trading in the shares of RUNL.

17. Further I find from Annexure VII that out of 13,57,509 shares, trades for 8,97,936 shares (66.14% of the Noticees) have been synchronized in nature, as the buy & sell order quantity and rate were identical, and the orders for these transactions were placed within a gap of less than one minute. I observed that Noticee No. 1 & 5 executed 85 & 11 buy trades respectively within a period of less than two months. In most of their buy trades, the counterparty sellers were one or the other Noticees only. There was zero difference of rates and quantities between the orders placed by said two Noticee and counterparties to the trades. Time difference between the orders placed by said two Noticee and counterparties was within the range of 00 to 12 seconds only. The synchronized trading by the Noticees as mentioned above suggests that the trades were not genuine, but as a part of the scheme devised by the Noticees to create the artificial volumes and false appearance of trading in the market.

18. It is pertinent to note here that the Noticee No. 1 to 6 have merely and evasively denied the allegations, but did not produce or submit any cogent reasons as to the genuineness of their trades in the above manner. The plea of the Noticee No. 1 to 6 that the off market transactions were executed with the objective to raise the funds for short term, is illogical/incorrect. Had their

intention was to raise the funds, then why did they purchase back the shares immediately from the same set of entities. The pattern of off loading the shares in off market by Noticee no. 1 to 6 and immediately purchasing the same in market is without any genuine reasons but only insinuate about their wrong practices.

19. Noticee No. 10 & 11 (Amrits Sales Promotion Pvt. Ltd. and Sakhi Barter Pvt. Ltd), submitted that they purchased 61,000 shares & 2,15,000 shares in off market from Noticee No.1 (Scope Vyapar Pvt. Ltd) and Noticee No. 2 (Signet Vinimay Pvt. Ltd) respectively, on November 18, 2009 at the rate of Rs. 172.50. Noticee No. 10 made the payment towards such purchase on March 08, 2010 and Noticee No. 11 made payment on March 06 - 17, 2010. Had it been spot transactions the payment of money and transfer of securities should have been effected immediately with in the stipulated time period. The transactions involved huge sums of money they should have entered into a genuine agreement. The Noticees any such evidences and the submissions of the counter parties were contradictory. Interestingly they submitted that they sold these shares to the transferors at a very lower price viz. Rs. 86.70/ Rs. 92.20 as compared to their purchase price of Rs. 172.50. Since the purpose of such acquirement of shares by the said two Noticee from the Noticee No. 1 & 2, were not genuine and it is beyond understanding as to why such huge amount remain unpaid for a period of almost three months, and suddenly, how it was paid during the month of March 2010 and sold back the shares at about 50% adverse price difference to the same parties. It is possible that one of the motives was to show wrong entries of corporate loss in their accounts by misusing the exchange trading mechanism.

20. Similarly, Noticee No. 13, 16, 17 & 21 submitted that they have purchased the shares in off market only on one date i.e. November 18, 2009 from the Noticee No. 1 to 6 and sold in the market. Their contention is not valid as the off market transfer of shares for the purchases were executed during February – March 2010 as per annexure VI to the SCN. Had the purchase transactions were executed on spot basis, the delivery/payment of shares and funds should have been completed within 24 hours, which was not done. Therefore, the contention

of the above Noticees that the off market transfers were on account of the purchases done on November 18, 2009 was only afterthought.

21. From the foregoing analysis and findings, I conclude that the Noticees acted in tandem by adopting a modus operandi of transferring shares in the off market to inter-connected group entities and buying back the shares from the same set of entities in market through synchronized trading. The off- market sale transaction by Noticee No 1 to 6 to Noticee 7 to 21 as counterparties followed by opposite transactions on the market between the same parties. Such circular/reversal trading resulted in creation of artificial volume and false appearance of trading which led to higher investors' interest in the scrip. It is therefore, established beyond doubts that the Noticees violated regulation 3 (a) to (d), 4 (1) and 4 (2) (a) & (g) of the PFUTP Regulations which warrants imposition of monetary penalty under section 15HA of the SEBI Act. Section 15 HA of the SEBI Act reads as follows:

15HA. Penalty for fraudulent and unfair trade practices.

If any person indulges in fraudulent and unfair trade practices relating to securities, he shall be liable to a penalty of twenty-five crore rupees or three times the amount of profits made out of such practices, whichever is higher.

22. While determining the quantum of penalty under section 15 HA of the SEBI Act, it is important to consider the factors stipulated in section 15J of the SEBI Act, which reads as under:-

15J - Factors to be taken into account by the adjudicating officer
While adjudging quantum of penalty under section 15-I, the adjudicating officer shall have due regard to the following factors, namely:-

(a) the amount of disproportionate gain or unfair advantage, wherever quantifiable, made as a result of the default;
(b) the amount of loss caused to an investor or group of investors as a result of the default;
(c) the repetitive nature of the default.

23. It is also not possible from the information/details available with me to arrive at the figures of profit made by the Noticees or the loss suffered by the investors. Further, there is nothing on record to show that the Noticees have repetitively indulged in such kinds of violations. However, taking into consideration seriousness of manipulation, the enormous numbers of aforesaid manipulative transactions, the adverse impact of such acts in disturbing the equilibrium of

the fair market, shaking the investor's confidence in the scrip etc., it is necessary that a justifiable penalty be imposed on the Noticees to meet the ends of justice. It is pertinent note that Scope Vyapar Private Ltd (Noticee No.1) has played the lead role in the entire scheme of the manipulation and the other entities played a supporting role. I am of the view that a penalty amount of ₹ 25,00,000/- (Rupees Twenty Five Lakh only) on Noticee No. 1 and ₹ 3,00,000/- (Rupees Three Lakh only) each on Noticee No. 2 to 21 is commensurate with their violations.

Order:

24. In view of the above, after considering the entire facts and circumstances of the case and exercising the powers conferred upon me under Section15 I of the Act read with rule 5 of the Adjudication Rules, I impose a penalty of ₹ 25,00,000/- (Rupees Twenty Five Lakh only) on Noticee No. 1 and ₹ 3,00,000/- (Rupees Three Lakh only) each on Noticee No. 2 to 21, and thus a total of ₹ 85,00,000/- (Rupees Eighty Five Lakh only) on the Noticees under the provisions of section 15 HA of the SEBI Act. I am of the view that the said penalties would commensurate with the violations committed by the Noticees.

25. The Noticees shall pay the said amount of penalty by way of demand draft in favour of “SEBI - Penalties Remittable to Government of India”, payable at Mumbai, within 45 days of receipt of this order. The demand draft shall be forwarded to the Chief General Manager, Investigation Department, Securities and Exchange Board of India, SEBI Bhavan, Plot No.C4-A, “G” Block, Bandra Kurla Complex, Bandra (East), Mumbai–400 051.

26. Copy of this order is being sent to the Noticees and also to the SEBI, in terms of rule 6 of the Adjudication Rules.

Date: March 06, 2013	**P. K. KURIACHEN**
Place: Mumbai	**ADJUDICATING OFFICER**