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

**GENERAL MANAGER &**
**ADJUDICATING OFFICER**

SEBI/EAD-10/SM/KH/OW/10835/1/2022
March 14, 2022

**By SPAD / Digitally Signed E-mail**

| Noticee No. | Name/Address/PAN of Noticee | Noticee No. | Name/Address/PAN of Noticee |
|---|---|---|---|
| 1. | Nishant Jain<br>C-504, Mahima Iris-I, 3A, Swage Farm, New Sanganer Road, Jaipur, Rajasthan 302019; 403 Sufal Appts S.J.S. Highway Bani Park Jaipur Rajasthan 302016<br><br>PAN: ADBPJ0618B<br><br>Email IDs:<br>nishant@tradeswift.net;<br>shrinihantji@hotmail.com;<br>sandeep@tradeswift.net | 2. | Pradeep Kumar Jain<br>3 Cha 18 Housing Board Shastri Nagar Jaipur Rajasthan 302016<br><br>PAN: ACAPJ1260F<br><br>Email ID:<br>broking.shares@gmail.com |
| 3. | Dharmendra Kumar Jain<br>House No.318 Vivek Vihar New Sanganer Roadshyam Nagar Jaipur Rajasthan 302019<br><br>PAN: ADBPJ4242K<br><br>Email IDs:<br>jain.dharmendra@gmail.com<br>tradeboss72@gmail.com<br>broking.shares@gmail.com | 4. | Dharmendra Jain HUF<br>318 Vivek Vihar New Sanganer Road Shyam Nagar Jaipur Rajasthan 302019<br><br>PAN: AAGHD2552J<br><br>Email IDs:<br>jain.dharmendra@gmail.com<br>tradeboss72@gmail.com<br>broking.shares@gmail.com |
| 5. | Jaipur Infragold Private Limited<br>K-3/12 LIC Flats Sector 6 Vidhyadhar Nagar Jaipur Rajasthan 302023<br><br>PAN: AACCJ8693D<br><br>Email ID:<br>baidfinance@hotmail.com | 6. | Rajiv Maheshwari<br>E-36, Arya Nagar Aptt, 91, I. P. Extn. Patparganj Delhi India 110092<br><br>PAN: AAAPM1959Q<br><br>Email ID:<br>daya.rajiv@gmail.com |
| 7. | Babulal Hansraj Lakhani<br>224, shiv shakti nagar, nr. Abad row house chandlodiya ahmedabad, gujarat 380014 | 8. | Ramanlal Ravchand Shah<br>E102 Swagat Rainforest 1 Village Kudasan Ta and Dist |


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| **9.** | Vinod Solanki<br>H No 15 478 Garib Awas Yojana Vijay Mill Tp 12 Fp 44 Naroda Road Ahmedabad 380025<br><br>PAN: DMKPS4150Q<br><br>Email ID:<br>solankivinod0106@gmail.com | **10.** | Bhagavatiben Vishnubhai Patel<br>1 vishwa karma row house near vishwa karma mandir chandlodia ahmedabad gujarat india 382481<br><br>PAN: CYBPP2362R<br><br>Email ID:<br>bhagvatipatel64@gmail.com |
| **11.** | Dhirajbhai Baladevji Thakor<br>772 thakor vas pratap bhuvan bank of baroda asarva gam ahmedabad city ahmedabad 380016<br><br>PAN: ATJPT1108Q<br><br>Email IDs:<br>dhirajthakor624@gmail.com<br>dhirajbthakor18@gmail.com<br>dheerajthakur7865@gmail.com<br>dhirajbthakor@gmail.com | **12.** | Bharti Sharma<br>d76 shiv ram park manglo dumaraudin nagar nangloi delhi india 110041<br><br>PAN: CZTPS4626L<br><br>Email ID:<br>sharmabharti12345@gmail.com |
| **13.** | Pinesh Nareshkumar Shah<br>479 Shantinath Ni Pole B H Caliodomrelief Road Ahmedabad Ahmedabad Gujarat India 380001<br>874, Shantinath Polehaja Patel Pole Ahmedabad Gujarat India 380001<br><br>PAN: ANEPS6388L<br><br>Email IDs:<br>pineshshah1@gmail.com<br>pineshnshah555@gmail.com<br>pineshshah1972@gmail.com | **14.** | Jasmin Indu Shah<br>208 Shivshakti Nagar Near Abad Row House Gota Road Chandlodia Ahmedabad Gujarat India 382481<br><br>PAN: FQYPS5187R<br><br>Email IDs:<br>jasminshah203@gmail.com<br>jasmindushah@gmail.com<br>jasminshah1975@gmail.com<br>jasminindushah75@gmail.com |
| **15.** | Mahendrabhai Naranbhai Patel<br>215 Stadium House Stadium Cross Road Navrangpura Ahmedabad Ahmedabad Gujarat India 380009 | | |

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**Sub: Notice under Rule 4(1) of SEBI (Procedure for Holding Inquiry and imposing penalties by Adjudicating Officer) Rules, 1995 in the matter of trading by certain entities in the scrip of BFL Asset Finvest Ltd (Formerly known as BFL Developers Ltd.)**

1. Securities and Exchange Board of India (hereinafter referred to as "**SEBI**") conducted an investigation in the matter of trading by certain entities in the scrip of BFL Asset Finvest Ltd (Formerly known as BFL Developers Ltd.) (hereinafter referred to as "**the Company/ by name/BFL-1**"). BFL-1 was incorporated on August 31, 1995 as a public limited company in the state of Rajasthan (Jaipur). The company is registered as Non-Banking Finance Company with Reserve Bank of India, presently engaged in a wide gamut of business activities viz. business of securities investments and trading, negotiable instruments etc. The registered address of BFL Asset Finvest Ltd is 1, Tara Nagar, Ajmer road, Jaipur, Rajasthan 302006. The shares of the Company are listed in the BSE Ltd (hereinafter referred to as "**BSE**") with effect from February 18, 2016 (through direct listing route). Prior to this, the scrip of the company was listed in Jaipur Stock Exchange Limited, Ahmedabad Stock Exchange Limited and Calcutta Stock Exchange Limited.

2. Investigation period was taken as December 08, 2016 to June 01, 2017 (hereinafter referred to as the "**Investigation Period/IP**"). Pursuant to Investigation, SEBI observed certain violations in the provisions of Securities and Exchange Board of India Act, 1992 (hereinafter referred to as '**SEBI Act**') and SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003 (hereinafter referred to as '**PFUTP Regulations**') by Noticees 1 to 15 who had tradedin the scrip of BFL-1 during the IP.

3. Vide its order dated May 10, 2021, (**Annexure- A**), SEBI appointed the undersigned as Adjudicating Officer under Sub-section 1 of Section 15-I of the SEBI Act and Rule 3 of the SEBI (Procedure for Holding Inquiry and imposing Penalties by Adjudicating Officer) Rules, 1995 (hereinafter referred to as '**SEBI Adjudication Rules**') to inquire into and adjudge under:

3.1 Section 15HA of SEBI Act, the alleged violation of Sections 12 A (a), (b), (c) of SEBI Act,1992, Regulations 3 (a), (b), (c), (d), 4(1), 4(2)(a) and (e) of PFUTP Regulations by Noticees 1 to 15 (herein after also referred individually "**by name**" and collectively referred to as "**Noticees**")

3.2 Section 15HA of SEBI Act, the alleged violation of Sections 12 A (a), (b), (c) of SEBI Act,1992, Regulations 3 (a), (b), (c), (d), 4(1), 4(2)(a) & (g) of PFUTP Regulations by Noticees 7 to 15.

in respect of their trading in the scrip of BFL-1.

4. **Price Volume Analysis:**

4.1 During investigation, the price movement and volume traded in the scrip during investigation period, in pre-investigation period and also in post investigation period in BSE were observed as below:

- Pre-Investigation period: 18/02/2016 to 21/02/2016*
- Investigation period: 22/02/2016 to 01/06/2017
- Post-Investigation period: 02/06/2017 to 31/07/2017

Table 1

| Period | Date | Price/ Date & Vol | Opening price/ volume on 1st trade day of the period | Closing price/ vol on last trade day of the period | Low price/ vol during the period | High price/ vol during the period | Avg. no. of shares traded daily during the period | Total traded quantity |
|---|---|---|---|---|---|---|---|---|
| Pre-investigation period | February 18, 2016 to February 21, 2016* | Price | - | - | - | - | - | - |
| | | Date | - | - | - | - | | |
| | | Vol | - | - | - | - | | |
| Investigation period | February 22, 2016 to June 01, 2017 | Price | Rs.12.50 | Rs.69.00 | Rs.21.50 | Rs.12.50 | 551.18 | 93701 |
| | | Date | 22/02/16 | 01/06/17 | 08/12/16 | 22/02/16 | | |
| | | Vol | 101 | 50 | 1 | 101 | | |
| Post Investigation period | June 02, 2017 to July 31, 2017 | Price | Rs.68.00 | Rs.68.00 | Rs.68.00 | Rs.68.20 | 192.5 | 770 |
| | | Date | 02.06.17 | 26.07.17 | 02.06.17 | 06.06.17 | | |
| | | Vol | 50 | 100 | 50 | 320 | | |

**Date of listing in BSE is 18.02.2016 & no trades were executed on the date of listing and subsequent dates till 21.2.2016 for want of counter party sell transaction and price movement commenced thereafter which is considered for investigation. Therefore, no pre-investigation data would be available.*

4.2 During the investigation period, it was obsereved that the price of the scrip opened at Rs.12.50 and rose to Rs.69 (i.e. price increased by 452%) with an average traded volume

of 551.18 shares and total traded volume of 93701 shares. Highest traded volume of 3020 shares was observed on April 28, 2017 and May 02, 2017.

5. Investigation observed the following top 10 buy and sell client concentration on BSE during the investigation period from 22/02/2016 to 01/06/2017:

Table 2

| Buyer | Traded Qty | %Tq | Seller | Traded Qty | %Tq |
|---|---|---|---|---|---|
| Pradeep Kumar Jain | 14009 | 14.95% | Pradeep Kumar Jain | 13220 | 14.11% |
| Dharmendra Kumar Jain | 9984 | 10.66% | Dharmendra Kumar Jain | 9456 | 10.09% |
| Dhirajbhai Baladevji Thakor | 7746 | 8.27% | Dhirajbhai Baladevji Thakor | 7746 | 8.27% |
| Bharti Sharma | 7567 | 8.08% | Bharti Sharma | 7567 | 8.08% |
| Bhagavatiben Vishnubhai Patel | 7151 | 7.63% | Bhagavatiben Vishnubhai Patel | 7151 | 7.63% |
| Kavita Jain | 6770 | 7.23% | Kavita Jain | 6740 | 7.19% |
| Ramanlal Ravchand Shah | 5751 | 6.14% | Ramanlal Ravchand Shah | 5751 | 6.14% |
| Dharmendra Jain Huf | 5220 | 5.57% | Dharmendra Jain Huf | 5220 | 5.57% |
| Pinesh Nareshkumar Shah | 5057 | 5.40% | Pinesh Nareshkumar Shah | 5057 | 5.40% |
| Vinod Solanki | 4876 | 5.20% | Vinod Solanki | 4876 | 5.20% |
| **Total** | **74131** | **79.11%** | **Total** | **72784** | **77.68%** |
| **Market Total** | **93701** | **100.00%** | **Market Total** | **93701** | **100.00%** |

6. It was observed from the above table that Pradeep Kumar Jain (Noticee 2) was the top buyer contributing 14.95% to the total market volume. He was also the top seller contributing 14.11% to the market volume.

7. **List of connected entities during investigation period:**

7.1 During investigation, trading pattern, order log details, Unique Client Code (UCC) details, Know Your Client (KYC) details, Ministry of Corporate Affairs (MCA) portal, bank statements and off market transactions were analysed and on the basis of that, the following entities were identified as connected entities and their connections amongst themselves and with any of the promoters or promoter group was established, which are as under:

Table 3:

| Sl.No | Name of the entity | PAN | Connection amongst suspected entities | Basis of Connection |
|---|---|---|---|---|
| 1 | Nishant Jain (Noticee1) | ADBPJ0618B | Connected to entities at Sl.No.2,3 and 10. | i. Familial relationship as son to entity at Sl.No 2 sharing common address common residential addresses namely, 403, Sufal Apt, S.J.S. Highway, Banipark, Jaipur, Rajasthan 302016 and C-504, Mahima Iris-1 3A Swage Farm, New Sanganer road, Jaipur, Rajasthan 302019, common mobile number 9829156005 and common email ID nishant@tradeswift.net and nishantxyzxyz@gmail.com. |

| | | | | |
|---|---|---|---|---|
| | | | | ii. Promoter of entity at Sl.No 3 which was a promoter of BFL as on quarter ended December 2016.<br>iii.Shares common email ID sandeep@tradeswift.net with entity at Sl.No 9<br>iv. Over 1% shareholder under public category in Entity at Sl.No 10.<br>v. Connected to entity at sl.no 3 & 9 by virtue of being one of the two designated directors of sl.no 3 along with entity at sl.no 9. |
| 2 | Nirmala Jain | AFTPJ8332E | Connected to entity at sl.no.1 | i. Mother of entity at Sl.No 1 and shares common addressses 403, Sufal Apt, S.J.S. Highway, Banipark, Jaipur, Rajasthan 302016 and C-504, Mahima Iris-1 3A Swage Farm, New Sanganer road, Jaipur, Rajasthan 302019, common mobile number 9829156005 and common email ID nishant@tradeswift.net and nishantxyzxyz@gmail.com. |
| 3. | Tradeswift Broking Private Limited | AAECA3760A | Connected to entities at Sl.No.1, 9 & 11 | i.Entities at Sl.No 1& 9 are promoters and designated directors of entity.<br>ii.Trading member for entities at Sl.No 1,2,8 & 10.<br>iii. Common address viz. Baid House, II Floor, 1, Tara Nagar, Ajmer Road, Jaipur 302006 with one of the promoter group entities of the company namely, Baid Leasing and Finance Co Ltd. |
| 4 | Anant Jain | BAVPJ3631C | Connected to entities at Sl.Nos.5,6 &7 | i. Familial relationship as son to entities at Sl.No 5 & 7<br>ii. Co-parcener in entity at Sl.No 6<br>iii.Shares common email id tradeboss72 with entity at Sl.No 9. |
| 5 | Dharmendra Kumar Jain (Noticee 3) | ADBPJ4242K | Connected to entities at Sl.Nos.4, 6, 7 | i.Familial relationship as husband and father to entities at sl.no 7 & 4 respectively.<br>ii.Karta of entity at sl.no 6<br>iii.Shares common email id tradeboss72@gmail.com and broking.shares@gmail.com with entities at sl.no 9 & 8 respectively. |
| 6 | Dharmendra Jain HUF (Noticee 4) | AAGHD2552J | Connected to entities at sl.nos.4,5,&7 | i.Connected to entity at Sl.No 5 who is the Karta and entities at sl.no 4 & 7 who are the coparceners. |
| 7 | Kavita Jain | ABUPJ3478L | Connected to entities at sl.no 4,5 & 6 | i.Familial relationship as wife and mother to entities at sl.no 5 & 4 respectively.<br>ii.Coparcener of entity at Sl.No 6 |
| 8 | Pradeep Jain (Noticee 2) | ACAPJ1260F | connected to sl.nos. 1 and 5 | i. Familial relationship as brother to entity at sl.no 9 and share common residential address at 3, CHA 18, Housing Board, Shastri Nagar, Jaipur, Rajasthan 302016.<br>ii.Shares common email ID broking.shares@gmail.com with entity at sl.no 5. |
| 9 | Sandeep Jain | ACSPJ9399K | Connected to entities at sl.nos.3 & 8 | i.Promoter and designated director of entity at sl.no 3<br>ii.Familial relationship as brother to entity at sl.no 8 sharing common residential address at 3, CHA 18, Housing Board, Shastri Nagar, Jaipur, Rajasthan 302016.<br>iii. Connected to entity at sl.no 1 & 3 by virtue of being one of the two designated directors of sl.no 3 along with entity at sl.no 1. |
| 10 | Jaipur Infragold Pvt Ltd. (Noticee 5) | AACCJ8693D | Connected to entities at sl.no.1 and 3 | i.Connected to entity at sl.no 1 by virtue of entity at sl.no 1 being more than 1% shareholder in the entity.<br>ii.Traded through entity at Sl.No 3<br>iii. Has email ID baidfinance@hotmail.com (erstwhile email ID of the company) and shares common address viz. Baid House, II Floor, 1, Tara Nagar, Ajmer Road, Jaipur 302006 with one of the promoters of the company namely, Baid Leasing and Finance Co Ltd.<br>iv. Received off-market credit of 60000 shares from Baid Housing Finance Private Limited, one of the companies of Baid Group on 30.03.2016. |

The connection chart depicting the relationship among the connected entities is given as **Annexure 1**. The above mentioned 10 entities which include Noticees 1 to 5 hereinafter are referred to as **"Group I"**.

8. **Trading by Group I entities:**

8.1 SEBI analysed the trades of Group I entities. The details of quantum of trading done by Group I entities during the investigation period are as under:

Table 4:

| Sl.No | Client name | Gross Buy | Gross Sell | Gross Traded Qty. | Net Qty. | %Buytq | %Selltq |
|---|---|---|---|---|---|---|---|
| 1 | Pradeep Kumar Jain | 14009 | 13220 | 27229 | 789 | 14.95% | 14.11% |
| 2 | Dharmendra Kumar Jain | 9984 | 9456 | 19440 | 528 | 10.66% | 10.09% |
| 3 | Kavita Jain | 6770 | 6740 | 13510 | 30 | 7.23% | 7.19% |
| 4 | Dharmendra Jain Huf | 5220 | 5220 | 10440 | 0 | 5.57% | 5.57% |
| 5 | Anant Jain | 4480 | 4450 | 8930 | 30 | 4.78% | 4.75% |
| 6 | Sandeep Kumar Jain | 1880 | 1880 | 3760 | 0 | 2.01% | 2.01% |
| 7 | Nishant Jain | 93 | 0 | 93 | 93 | 0.10% | 0.00% |
| 8 | Nirmala Jain | 2 | 0 | 2 | 2 | 0.00% | 0.00% |
| 9 | Jaipur Infragold Private Limited | 0 | 3397 | 3397 | -3397 | 0.00% | 3.63% |
| | **Total** | **42438** | **44363** | **86801** | | **45.29%** | **47.35%** |
| | **Market total** | **93701** | **93701** | **92.64%** | | **100.00%** | **100.00%** |

8.2 It was observed from the above table that the Group I entities had contributed 92.64% of the total market volume with 45.29% to market buy volume and 47.35% to the market sell volume. Noticees 1 to 5 were also observed to be part of top 10 clients who had traded during the investigation period as mentioned in Table 4 above.

9. **Analysis of trading by Group I entities during the IP:**

9.1 The analysis of trade log and order log **(Annexure 2)** for the entire period of investigation revealed that, during the investigation period, out of total 170 trading days on BSE, Group I entities traded on 157 trading days and bought 42438 shares and sold 44363 shares. The entities were also trading amongst themselves contributing to the total traded volume of 38860 shares in the scrip. The quantum of trades by Group I entities are as mentioned below:

Table 5

| Market Volume (1) | Total no. of shares bought by the group (2) | Total no. of shares sold by the group (3) | Total traded quantity among the group entities (4) | Traded qty among the group as a % of mkt vol (5)=(4)/(1)% | Traded qty among the group as a % of total no. of shares bought (6)=(4)/(2)% | Traded qty among the group as a % of total no. of shares sold (7)=(4)/(3)% |
|---|---|---|---|---|---|---|
| 93701 | 42438 | 44363 | 38860 | 41.47 | 91.57 | 87.60 |

10. **Synchronized trades among Group I entities:**

10.1 During the investigation period, it was observed that the Group I entities had executed synchronized trades among themselves for a trade volume of 3807 shares which was

4.06% of total market volume. Details of synchronized trades among entities belonging to Group I are given below:

Table 6

| Market volume | Gross Buy Qty of suspected entities | Gross Sell Qty of suspected entities | Total qty traded by suspected entities | Total traded qty among the suspected entities | Synchronized traded qty by suspected entities | Sync Trades qty. as % of total traded qty among the suspected entities | Sync Trades qty. as % of Total market volume | No. of synchronised trades | Sum of LTP at sync trades (Rs.) |
|---|---|---|---|---|---|---|---|---|---|
| 93701 | 42438 | 44363 | 86801 | 38860 | 3807 | 9.80 | 4.06 | 87 | 14.40 |

10.2 During the investigation period, it was observed that below pairs of Group I entities had indulged in synchronized trades as given below:

Table 7

| Buyer PAN | Buyer Name | Seller PAN | Seller Name | Synchronized Qty | Sum Of Ltp Diff | No. of Days | No. of trades | %Mkt vol |
|---|---|---|---|---|---|---|---|---|
| ABUPJ3478L | Kavita Jain | ACAPJ1260F | Pradeep Kumar Jain | 300 | -0.20 | 1 | 1 | 0.32% |
| ABUPJ3478L | Kavita Jain | ADBPJ4242K | Dharmendra Kumar Jain | 190 | 0.00 | 1 | 1 | 0.20% |
| ACAPJ1260F | Pradeep Kumar Jain | AAGHD2552J | Dharmendra Jain Huf | 180 | 0.10 | 2 | 2 | 0.19% |
| ACAPJ1260F | Pradeep Kumar Jain | ABUPJ3478L | Kavita Jain | 150 | 0.00 | 1 | 1 | 0.16% |
| ACAPJ1260F | Pradeep Kumar Jain | ACSPJ9399K | Sandeep Kumar Jain | 390 | 0.10 | 2 | 2 | 0.42% |
| ACAPJ1260F | Pradeep Kumar Jain | ADBPJ4242K | Dharmendra Kumar Jain | 490 | 0.10 | 5 | 5 | 0.52% |
| ACAPJ1260F | Pradeep Kumar Jain | BAVPJ3631C | Anant Jain | 800 | 0.05 | 4 | 4 | 0.85% |
| ACSPJ9399K | Sandeep Kumar Jain | ACAPJ1260F | Pradeep Kumar Jain | 200 | 0.00 | 1 | 1 | 0.21% |
| ACSPJ9399K | Sandeep Kumar Jain | ADBPJ4242K | Dharmendra Kumar Jain | 184 | 0.00 | 1 | 1 | 0.20% |
| ADBPJ0618B | Nishant Jain | AACCJ8693D | Jaipur Infragold Private Limited | 71 | 14.10 | 56 | 64 | 0.08% |
| ADBPJ4242K | Dharmendra Kumar Jain | ACAPJ1260F | Pradeep Kumar Jain | 300 | 0.05 | 1 | 1 | 0.32% |
| ADBPJ4242K | Dharmendra Kumar Jain | ACSPJ9399K | Sandeep Kumar Jain | 100 | 0.10 | 1 | 1 | 0.11% |
| AFTPJ8332E | Nirmala Jain | AACCJ8693D | Jaipur Infragold Private Limited | 2 | 0.10 | 1 | 2 | 0.00% |
| BAVPJ3631C | Anant Jain | ABUPJ3478L | Kavita Jain | 450 | -0.10 | 1 | 1 | 0.48% |
| **Total** | | | | **3807** | **14.40** | **72** | **87** | **4.06%** |

10.3 The percentage of entity-wise synchronized trades is as given below:

Table 8

| Entity Name | PAN No. | No. of Instances of Sync Trades | Sync Trade Quantity | % of Sync Qty. to Tot. Market Vol. during 22.02.2016 to 01.06.2017 (Total Mkt Vol: 93701) | % of Sync. Qty. to. Sync. Qty. Traded (Total Sync Qty : 3807) |
|---|---|---|---|---|---|
| anant jain | ABUPJ3478L | 2 | 450 | 0.48% | 11.82% |
| dharmendra kumar jain | ACAPJ1260F | 14 | 400 | 0.43% | 10.51% |
| kavita jain | ACSPJ9399K | 2 | 490 | 0.52% | 12.87% |
| nirmala jain | ADBPJ0618B | 64 | 2 | 0.00% | 0.05% |
| nishant jain | ADBPJ4242K | 2 | 71 | 0.08% | 1.86% |
| pradeep kumar jain | AFTPJ8332E | 2 | 2010 | 2.15% | 52.80% |
| sandeep kumar jain | BAVPJ3631C | 1 | 384 | 0.41% | 10.09% |
| **Total** | | 87 | 3807 | 4.06% | 100% |

10.4 From the table above, it was observed that the percentage of synchronized shares of Pradeep Kumar Jain (Noticee 2) to the market volume was more than than 1%. However, it was seen that even though the synchronized trades of entities, Nishant Jain (Noticee 1) and Jaipur Infragold Private Limited (Noticee 5) contributed only 0.08% to market volume, the Last Traded Price (LTP) contribution of Noticees 1 and 5 through such trades was Rs. 14.10 which is 92.97% of total LTP contribution of Rs. 14.40 of the group. Noticees 1 and 5 contributed Rs. 14.10 to LTP through 64 trades in 56 trading days and synchronized quantity was 71 shares. It was observed that Noticees 1 and 5 traded through the same trading member, namely, Tradeswift Broking Private Limited and from the same terminal location and ID wherein the entities and have traded only 1-3 shares in each day of the 56 trading days. The trades of Noticees 1 and 5 increased the price of the scrip from Rs. 16.15 to Rs. 37.85 through 64 synchronized trades. The LTP analysis of Noticees 1 and 5 is discussed in the subsequent paragraphs.

10.5 On the basis of the aforesaid analysis, it is alleged that Noticees 1, 5 and 2 contributed to artificial market volumes and by indulging in trades that were in the form of synchronized trades to give a false and misleading appearance of trading in the scrip at BSE, Noticees 1, 2 and 5 are alleged to have violated the provisions of Section 12A(a), (b), (c) of SEBI Act and Regulations 3 (a), (b), (c), (d), 4 (1), 4 (2) (a) of PFUTP Regulations.

10.4 The date-wise synchronized trades done by Noticees 1, 5 and 2 is placed alongside as **Annexure 3.**

11. **Synchronized trades among other entities:**

11.1 During the investigation period, it was observed that 11 entities had executed synchronized trades among themselves for a trade volume of 26586 shares which is 28.37% of total market volume. These 11 entities, which include Noticees 7 to 15 mentioned in the below table are hereinafter collectively referred to as **"Group II"**. The connection for 8 out of the 11 Group II entities based on UCC details is as given below:

Table 9

| Sl.No | Name | Connection |
|---|---|---|
| 1 | Babulal Hansraj Lakhani (Noticee 7) | Common mobile no 7096785779 with entity at sl.no 2<br>common mobile no 7779082715 with entities at sl.no 3 & 4 |
| 2 | Vinod Solanki (Noticee 9) | Common mobile no. 7096785779 with entity at sl.no 1 |
| 3 | Jasmin Indu Shah(Noticee 14) | Common mobile no. 7779082715 with entity at sl.no 1 & 4 |
| 4 | Ramanlal Ravchand Shah (Noticee 8) | Common mobile no. 7779082715 with entity at sl.no 1 & 3<br>Common mobile no. 9998447513 with entity at sl.no 5<br>Common mobile no 8905762634 with entity at sl.no.6 |
| 5 | Bhagavatiben Vishnubhai Patel (Noticee 10) | Common mobile no. 9998447513 with entity at sl.no 4 |
| 6 | Mahendrabhai Naranbhai Patel (Noticee 15) | Common mobile no 8347937024 with entity at sl.no 7 & 8<br>Common mobile no 8905762634 with entity at sl.no.4 |
| 7 | Dhirajbhai Baladevji Thakor (Noticee11) | Common mobile no 8347937024 with entity at sl.no 6 & 8 |
| 8 | Roshanlal Daulatram Aggarwal | Common mobile no 8347937024 with entity at sl.no 6 & 7 |
| 9 | Pinesh Nareshkumar Shah (Noticee 13) | No connection could be established based on UCC details |
| 10 | Bharti Sharma (Noticee 12) | |
| 11 | Suresh Piraji Marvadi | |

The KYC and UCC details of Group II are given as **Annexure 4**.

11.2 Investigation further analysed the trading pattern of Group II entities and observed that they had done synchronised trades. The details of synchronized trades among Group II entities are given below:

Table 10

| Market volume | Gross Buy Qty of entities | Gross Sell Qty of entities | Total qty traded by entities | Total traded qty among the entities | Synchronized traded qty by entities | Sync Trades qty. as % of total traded qty among the entities | Sync Trades qty. as % of Total market volume | No. of synchronised trades | Sum of LTP at sync trades (Rs.) |
|---|---|---|---|---|---|---|---|---|---|
| 93701 | 44559 | 44559 | 89118 | 43808 | 26586 | 60.69 | 28.37 | 336 | 7.60 |

11.3 During the investigation period, it was observed that, there were 58 pairs of trading by Group II entities in synchronized trades as given below:

Table 11

| Buyer Name | Seller Name | Synchronized Quantity | Sum Of Ltp Diff | Number Of Days | Number Of Trades | %Market volume |
|---|---|---|---|---|---|---|
| Babulal Hansraj Lakhani | Dhirajbhai Baladevji Thakor | 350 | 0.05 | 4 | 4 | 0.37% |
| Babulal Hansraj Lakhani | Roshanlal Daulatram Aggarwal | 100 | 0.00 | 1 | 1 | 0.11% |
| Babulal Hansraj Lakhani | Bhagavatiben Vishnubhai Patel | 100 | 0.05 | 1 | 1 | 0.11% |
| Babulal Hansraj Lakhani | Bharti Sharma | 434 | 0.10 | 6 | 7 | 0.46% |
| Babulal Hansraj Lakhani | Ramanlal Ravchand Shah | 250 | 0.60 | 3 | 4 | 0.27% |
| Pinesh Nareshkumar Shah | Dhirajbhai Baladevji Thakor | 1278 | 0.00 | 15 | 15 | 1.36% |
| Pinesh Nareshkumar Shah | Bhagavatiben Vishnubhai Patel | 525 | 0.00 | 4 | 4 | 0.56% |
| Pinesh Nareshkumar Shah | Bharti Sharma | 815 | 0.00 | 9 | 9 | 0.87% |
| Pinesh Nareshkumar Shah | Ramanlal Ravchand Shah | 279 | 0.05 | 5 | 6 | 0.30% |
| Dhirajbhai Baladevji Thakor | Babulal Hansraj Lakhani | 384 | 0.40 | 5 | 6 | 0.41% |
| Dhirajbhai Baladevji Thakor | Pinesh Nareshkumar Shah | 1076 | 0.00 | 13 | 13 | 1.15% |
| Dhirajbhai Baladevji Thakor | Suresh Piraji Marvadi | 100 | 0.10 | 1 | 1 | 0.11% |
| Dhirajbhai Baladevji Thakor | Bhagavatiben Vishnubhai Patel | 655 | -0.05 | 7 | 9 | 0.70% |
| Dhirajbhai Baladevji Thakor | Bharti Sharma | 1495 | -0.50 | 15 | 18 | 1.60% |
| Dhirajbhai Baladevji Thakor | Mahendrabhai Naranbhai Patel | 277 | -0.05 | 3 | 3 | 0.30% |
| Dhirajbhai Baladevji Thakor | Vinod Solanki | 480 | 0.30 | 7 | 8 | 0.51% |
| Dhirajbhai Baladevji Thakor | Jasmin Indu Shah | 100 | 0.05 | 1 | 1 | 0.11% |
| Dhirajbhai Baladevji Thakor | Ramanlal Ravchand Shah | 652 | 0.95 | 10 | 10 | 0.70% |
| Suresh Piraji Marvadi | Dhirajbhai Baladevji Thakor | 150 | -0.15 | 1 | 2 | 0.16% |
| Suresh Piraji Marvadi | Bharti Sharma | 50 | 0.00 | 1 | 1 | 0.05% |
| Roshanlal Daulatram Aggarwal | Dhirajbhai Baladevji Thakor | 100 | 0.05 | 1 | 1 | 0.11% |
| Roshanlal Daulatram Aggarwal | Bhagavatiben Vishnubhai Patel | 100 | 0.10 | 1 | 1 | 0.11% |
| Bhagavatiben Vishnubhai Patel | Babulal Hansraj Lakhani | 100 | 0.05 | 1 | 1 | 0.11% |
| Bhagavatiben Vishnubhai Patel | Pinesh Nareshkumar Shah | 375 | 0.05 | 5 | 5 | 0.40% |
| Bhagavatiben Vishnubhai Patel | Dhirajbhai Baladevji Thakor | 290 | 0.30 | 3 | 3 | 0.31% |
| Bhagavatiben Vishnubhai Patel | Roshanlal Daulatram Aggarwal | 100 | -0.05 | 1 | 1 | 0.11% |

| Buyer Name | Seller Name | Synchronized Quantity | Sum Of Ltp Diff | Number Of Days | Number Of Trades | %Market volume |
|---|---|---|---|---|---|---|
| Bhagavatiben Vishnubhai Patel | Bharti Sharma | 740 | 0.15 | 11 | 12 | 0.79% |
| Bhagavatiben Vishnubhai Patel | Mahendrabhai Naranbhai Patel | 548 | 0.05 | 4 | 5 | 0.58% |
| Bhagavatiben Vishnubhai Patel | Vinod Solanki | 700 | 0.40 | 6 | 8 | 0.75% |
| Bhagavatiben Vishnubhai Patel | Ramanlal Ravchand Shah | 1597 | 1.25 | 16 | 20 | 1.70% |
| Bharti Sharma | Babulal Hansraj Lakhani | 450 | 0.25 | 4 | 5 | 0.48% |
| Bharti Sharma | Pinesh Nareshkumar Shah | 530 | 0.00 | 10 | 10 | 0.57% |
| Bharti Sharma | Dhirajbhai Baladevji Thakor | 1658 | 0.65 | 16 | 18 | 1.77% |
| Bharti Sharma | Bhagavatiben Vishnubhai Patel | 880 | 0.00 | 9 | 10 | 0.94% |
| Bharti Sharma | Mahendrabhai Naranbhai Patel | 125 | 0.05 | 1 | 1 | 0.13% |
| Bharti Sharma | Vinod Solanki | 540 | 0.05 | 9 | 9 | 0.58% |
| Bharti Sharma | Jasmin Indu Shah | 100 | -0.05 | 1 | 1 | 0.11% |
| Bharti Sharma | Ramanlal Ravchand Shah | 450 | 0.10 | 1 | 2 | 0.48% |
| Mahendrabhai Naranbhai Patel | Pinesh Nareshkumar Shah | 100 | 0.00 | 1 | 1 | 0.11% |
| Mahendrabhai Naranbhai Patel | Dhirajbhai Baladevji Thakor | 2 | 0.00 | 2 | 2 | 0.00% |
| Mahendrabhai Naranbhai Patel | Bhagavatiben Vishnubhai Patel | 349 | 0.00 | 2 | 3 | 0.37% |
| Mahendrabhai Naranbhai Patel | Bharti Sharma | 100 | 0.00 | 1 | 1 | 0.11% |
| Mahendrabhai Naranbhai Patel | Vinod Solanki | 200 | -0.05 | 2 | 2 | 0.21% |
| Mahendrabhai Naranbhai Patel | Ramanlal Ravchand Shah | 250 | 0.50 | 1 | 1 | 0.27% |
| Vinod Solanki | Dhirajbhai Baladevji Thakor | 481 | 0.10 | 8 | 8 | 0.51% |
| Vinod Solanki | Bhagavatiben Vishnubhai Patel | 750 | 0.30 | 8 | 8 | 0.80% |
| Vinod Solanki | Bharti Sharma | 970 | -0.10 | 11 | 13 | 1.04% |
| Vinod Solanki | Mahendrabhai Naranbhai Patel | 100 | 0.05 | 1 | 1 | 0.11% |
| Vinod Solanki | Ramanlal Ravchand Shah | 600 | 0.25 | 8 | 10 | 0.64% |
| Jasmin Indu Shah | Babulal Hansraj Lakhani | 100 | 0.00 | 1 | 1 | 0.11% |
| Jasmin Indu Shah | Bharti Sharma | 100 | 0.25 | 1 | 1 | 0.11% |
| Ramanlal Ravchand Shah | Babulal Hansraj Lakhani | 400 | -0.25 | 3 | 5 | 0.43% |
| Ramanlal Ravchand Shah | Pinesh Nareshkumar Shah | 479 | -0.05 | 10 | 10 | 0.51% |
| Ramanlal Ravchand Shah | Dhirajbhai Baladevji Thakor | 275 | -0.10 | 3 | 3 | 0.29% |
| Ramanlal Ravchand Shah | Bhagavatiben Vishnubhai Patel | 991 | 0.45 | 10 | 12 | 1.06% |
| Ramanlal Ravchand Shah | Bharti Sharma | 325 | 0.55 | 2 | 2 | 0.35% |
| Ramanlal Ravchand Shah | Mahendrabhai Naranbhai Patel | 100 | 0.00 | 1 | 1 | 0.11% |

| Buyer Name | Seller Name | Synchronized Quantity | Sum Of Ltp Diff | Number Of Days | Number Of Trades | %Market volume |
|---|---|---|---|---|---|---|
| Ramanlal Ravchand Shah | Vinod Solanki | 981 | 0.40 | 13 | 15 | 1.05% |
| | | **26586** | **7.60** | **34** | **336** | **28.37%** |

11.4 From the table above, it was observed that Group II entities, through 336 synchronized trades, contributed Rs. 7.60 to net LTP. The date-wise synchronized trades done by Group II entities over 34 trading days is provided as **Annexure 5.**

11.5 Percentage of synchronized trades of Group II entities is as given below:

Table 12

| Entity Name | No. of Instances of Sync Trades | Sync Trade Quantity | % of Sync Qty. to Tot. Market Vol. during 22.02.2016 to 01.06.2017 (Total Mkt Vol: 93701) | % of Sync. Qty. to. Sync. Qty. Traded (Total Sync Qty : 26586) |
|---|---|---|---|---|
| babulal hansraj lakhani | 17 | 1434 | 1.53% | 5.39% |
| bhagavatiben vishnubhai patel | 55 | 4350 | 4.64% | 16.36% |
| bharti sharma | 56 | 5029 | 5.37% | 18.92% |
| dhirajbhai baladevji thakor | 69 | 4584 | 4.89% | 17.24% |
| jasmin indu shah | 2 | 200 | 0.21% | 0.75% |
| mahendrabhai naranbhai patel | 10 | 1150 | 1.23% | 4.33% |
| pinesh nareshkumar shah | 34 | 2560 | 2.73% | 9.63% |
| ramanlal ravchand shah | 48 | 4078 | 4.35% | 15.34% |
| roshanlal daulatram aggarwal | 2 | 200 | 0.21% | 0.75% |
| suresh piraji marvadi | 3 | 100 | 0.11% | 0.38% |
| vinod solanki | 40 | 2901 | 3.10% | 10.91% |
| **Total** | **336** | **26586** | **28.37%** | **100%** |

## 12. Circular trades among Group II entities:

12.1 It was observed that Group II entities had indulged in 75 instances of circular trades over 30 trading days as summarized below:

Table 13

| Market Volume | Total No of trading days | No of circular trades | Total circular quantity traded | % to Mkt Volume |
|---|---|---|---|---|
| 93701 | 30 | 75 | 19633 | 20.95% |

12.2 From the above table, it was observed Group II entities had contributed significantly to the total market volume through circular trades. Analysis of one instance of circular trades done by Group II entities is given below for illustration. The list of all the instances are provided as **Annexure 6.**

12.3 Analysis of circular trading pattern on March 07, 2017: It was observed that, the below mentioned entities belonging to Group II traded among themselves in the scrip of BFL on March 07, 2017 and contributed 58.11% of the market volume on that day. A tabular representation of the said trades is placed below.

Table 14

| Sl.No | Buyer Name | Seller Name | Order Time | CP Order Time | Order Rate (Rs.) | CP Order Rate (Rs.) | Order Qty | CP Order Qty | Traded Quantity |
|---|---|---|---|---|---|---|---|---|---|
| 1 | jasmin indu shah | bharti sharma | 14:22:37.107711 | 14:22:36.941484 | 45.75 | 45.75 | 100 | 100 | 100 |
| | dhirajbhai baladevji thakor | jasmin indu shah | 14:22:49.660822 | 14:22:49.469635 | 45.8 | 45.8 | 100 | 100 | 100 |
| | suresh piraji marvadi | dhirajbhai baladevji thakor | 14:22:57.936309 | 14:22:57.658410 | 45.85 | 45.85 | 100 | 100 | 100 |
| | bharti sharma | babulal hansraj lakhani | 14:23:09.226829 | 14:23:09.093618 | 45.9 | 45.9 | 100 | 100 | 100 |
| | babulal hansraj lakhani | suresh piraji marvadi | 14:23:22.263135 | 14:23:21.177409 | 45.95 | 45.95 | 99 | 100 | 99 |
| 2 | babulal hansraj lakhani | bharti sharma | 14:45:15.684805 | 14:45:15.198223 | 45.75 | 45.75 | 100 | 100 | 50 |
| | bharti sharma | jasmin indu shah | 14:45:26.635644 | 14:45:26.444483 | 45.70 | 45.70 | 100 | 100 | 100 |
| | jasmin indu shah | babulal hansraj lakhani | 14:45:39.198745 | 14:45:38.862481 | 45.80 | 45.80 | 100 | 100 | 100 |
| **Total Circular Quantity Traded among the entities *(Minimum quantity traded among entities × No. of legs) (i.e. 99 x 5 plus 50 x 3)*** | | | | | | | | | **645** |
| **% of Total Market Volume traded as Circular Quantity among the entities** | | | | | | | | | **58.11%** |
| **Total Market Volume on 07.03.2017** | | | | | | | | | **1110** |

12.4 It was observed from the above that the entities had instantly placed buy and sell orders (within seconds) one after the other to match the price and quantity of the counterparty client. The entities traded 645 shares among themselves during the day by entering into circular trades out of total 1110 shares traded during that day i.e. the entities contributed 58.11% of circular quantity during the day among themselves. The trading pattern of these entities clearly indicates the meeting of minds between the buyer and the seller and their intention to trade exclusively between themselves by entering into circular trades without intending to change the ownership of the shares thereby creating artificial volume in the scrip of BFL-1.

12.5 Percentage of circular trades in Group II entity-wise is as given below:

Table 15

| Entity Name | No. of Instances of Circular Trades | Circular Traded Quantity | % of Cir. Qty. to Tot. Market Vol. during 22.02.2016 to 01.06.2017 (Mkt Vol: 93701) | % of Cir. Qty. to. Cir. Qty. Traded (Total Cir. Qty: 19633) |
|---|---|---|---|---|
| babulal hansraj lakhani | 17 | 1617 | 1.73% | 8.24% |
| bhagavatiben vishnubhai patel | 43 | 2790 | 2.98% | 14.21% |
| bharti sharma | 56 | 3985 | 4.25% | 20.30% |
| dhirajbhai baladevji thakor | 53 | 3746 | 4.00% | 19.08% |
| jasmin indu shah | 3 | 349 | 0.37% | 1.78% |
| mahendrabhai naranbhai patel | 9 | 927 | 0.99% | 4.72% |
| pinesh nareshkumar shah | 24 | 1450 | 1.55% | 7.39% |
| ramanlal ravchand shah | 35 | 2228 | 2.38% | 11.35% |
| roshanlal daulatram aggarwal | 2 | 200 | 0.21% | 1.02% |
| suresh piraji marvadi | 1 | 99 | 0.11% | 0.50% |
| vinod solanki | 39 | 2242 | 2.39% | 11.42% |
| **Total** | **282** | **19633** | **20.95%** | **100%** |

13. **Reversal trades among Group II entities:**

13.1 It was observed that Group II entities entered into reversal trades among themselves at BSE during the investigation period. Summary of reversal trades executed by the Group II entities is as under:

Table 16

| Mrk Vol | Sum of reversal qty | Volume generated through reversal trades (artificial volume) | % of artificial volume to total market volume | No of reversal trades | No of days of reversal trades |
|---|---|---|---|---|---|
| 93701 | 10864 | 21728 | 23.19% | 878 | 33 |

13.2 It was observed from the above table that the Group II entities had contributed significantly to the total market volume by reversal trades. The summary of reversal trades done by Group II entities is provided as **Annexure 7**. Percentage of entity-wise reversal trades by Group II entities is as given below:

Table 17

| Entity Name | No. of Instances of Reversal Trades | Reversal Trade Quantity | % of Rev. Qty. to Tot. Market Vol. during 22.02.2016 to 01.06.2017 (Mkt Vol: 93701) | % of Rev. Qty. to. Rev. Qty. Traded (Total Rev Qty 21728) |
|---|---|---|---|---|
| bhagavatiben vishnubhai patel | 162 | 3685 | 3.93% | 16.96% |
| bharti sharma | 133 | 3401 | 3.63% | 15.65% |
| dhirajbhai baladevji thakor | 160 | 3576 | 3.82% | 16.46% |
| jasmin indu shah | 2 | 100 | 0.11% | 0.46% |
| mahendrabhai naranbhai patel | 71 | 2276 | 2.43% | 10.47% |
| ramanlal ravchand shah | 105 | 3169 | 3.38% | 14.58% |
| suresh piraji marvadi | 3 | 100 | 0.11% | 0.46% |
| vinod solanki | 98 | 2337 | 2.49% | 10.76% |

| Entity Name | No. of Instances of Reversal Trades | Reversal Trade Quantity | % of Rev. Qty. to Tot. Market Vol. during 22.02.2016 to 01.06.2017 (Mkt Vol: 93701) | % of Rev. Qty. to. Rev. Qty. Traded (Total Rev Qty 21728) |
|---|---|---|---|---|
| babulal hansraj lakhani | 44 | 843 | 0.90% | 3.88% |
| pinesh nareshkumar shah | 98 | 2141 | 2.28% | 9.85% |
| roshanlal daulatram aggarwal | 2 | 100 | 0.11% | 0.46% |
| **Total** | **878** | **21728** | **23.19%** | **100%** |

13.3 From the above analyses as brought out in above paragraphs, investigation observed that 9 Noticees, namely, Babulal Hansraj Lakhani (Noticee 7), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Jasmin Indu Shah (Noticee 14), Bhagavatiben Vishnubhai Patel (Noticee 10), Ramanlal Ravchand Shah (Noticee 8), Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13) and Mahendrabhai Naranbhai Patel (Noticee 15) significantly contributed to the total volume of synchronized, reversal and circular trades.

13.4 It was also observed that these synchronized, circular and reversal trades indulged by the aforesaid 9 Noticees, did not result in change in beneficial ownership. It was therefore alleged that the trades by the aforesaid 9 Noticees created misleading appearance of trading in the scrip. Further, it was alleged since the nature of trades executed by the aforesaid 9 entities were not routine normal trades but were only sham trades, such trades had the effect of creating an artificial volume in the market.

13.5 It is, therefore, alleged that by indulging in trades that were in the form of synchronized, circular and reversal trades, the aforesaid 9 Noticees who are part of Group II entities have given a false and misleading appearance of trading in the scrip at BSE and as such, these entities are considered to have executed manipulative trades and manipulated the volume of the scrip during the investigation period. Therefore, it is alleged that by indulging in synchronized trades that created a misleading appearance of trading in the scrip of BFL-1, the Group II entities, i.e, Babulal Hansraj Lakhani (Noticee 7), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Jasmin Indu Shah (Noticee 14), Bhagavatiben Vishnubhai Patel (Noticee 10), Ramanlal Ravchand Shah (Noticee 8), Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13) and Mahendrabhai Naranbhai Patel (Noticee 15) have violated the provisions of Section 12A (a), (b), (c) of SEBI Act, Regulations 3 (a), (b), (c), (d), 4(1), 4(2) (a) of PFUTP Regulations. Further, it

is also alleged that by indulging in reversal and circular trades that did not result in change of beneficial ownership and created a misleading appearance of trading in the scrip, Babulal Hansraj Lakhani (Noticee 7), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Jasmin Indu Shah (Noticee 14), Bhagavatiben Vishnubhai Patel (Noticee 10), Ramanlal Ravchand Shah (Noticee 8), Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13) and Mahendrabhai Naranbhai Patel (Noticee 15) have violated the provisions of Section 12A (a), (b), (c) of SEBI Act read with Regulations 3 (a), (b), (c) and (d) and 4(1), 4(2) (a) and (g) of PFUTP Regulations.

14. **Patch-wise Analysis**:

14.1 On examination of the trades executed, it was observed that different set of clients were involved in 3 different phases of price rise and further, the price rise was also accompanied by volume increase in its last two phases, as compared to phase 1. The trades were examined in three distinctive patches as mentioned below:

Table 18

| Period | Date | Price/ Date & Vol | Opening price/ volume on 1st trade day of the period | Closing price/ vol on last trade day of the period | Low price/ vol during the period | High price/ vol during the period | Avg. no. of shares traded daily during the period | Total traded quantity |
|---|---|---|---|---|---|---|---|---|
| 1 (Price Rise) | February 22, 2016 to January 16, 2017 | Price | Rs.12.50 | Rs.37.85 | Rs.12.50 | Rs.37.85 | 2.47 | 230 |
| | | Date | 22.02.16 | 16.01.17 | 22.02.16 | 16.01.17 | | |
| | | Vol | 101 | 4 | 101 | 4 | | |
| 2 (Price Rise) | January 18, 2017* to April 25, 2017 | Price | Rs.37 | Rs.47.05 | Rs.36.20 | Rs.48.55 | 1232.81 | 78900 |
| | | Date | 18.01.17 | 25.04.17 | 18.01.17 | 19.04.17 | | |
| | | Vol | 540 | 1002 | 540 | 1570 | | |
| 3 (Price Rise) | April 26, 2017 to June 01,2017 | Price | Rs.45.50 | Rs.69 | Rs.45.50 | Rs.69 | 1120.85 | 14571 |
| | | Date | 26.04.17 | 01.06.17 | 26.04.17 | 01.06.17 | | |
| | | Vol | 3011 | 50 | 3011 | 50 | | |

**No trades were executed on Jan 17, 2017*

**Patch 1 (February 22, 2016 to January 16, 2017):**

15. **Top 10 LTP contributors among buyers**:

15.1 The details of top 10 LTP contributors among buyers, as observed in investigation, are given below:

Table 19

| Entity name | All Ltp Rate | All Traded Qty | All No Trades | Pos Ltp Rate | Pos Traded Qty | Pos No Trades | Neg Ltp Rate | Neg Traded Qty | Neg No Trades | Zero Traded Qty | Zero No Trades | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Nishant Jain | 14.40 | 93 | 86 | 29.35 | 58 | 54 | -14.95 | 29 | 27 | 6 | 5 | 72.74% |
| Rajiv Maheshwari | 5.08 | 7 | 7 | 5.08 | 7 | 7 | 0.00 | 0 | 0 | 0 | 0 | 12.59% |
| Meenu Gupta | 1.90 | 13 | 2 | 1.90 | 13 | 2 | 0.00 | 0 | 0 | 0 | 0 | 4.71% |
| Saibal Kumar Dutt | 1.30 | 1 | 1 | 1.30 | 1 | 1 | 0.00 | 0 | 0 | 0 | 0 | 3.22% |
| Anantheshwar Pai Uppinangady | 1.00 | 12 | 9 | 1.00 | 2 | 2 | 0.00 | 0 | 0 | 10 | 7 | 2.48% |
| Shripal Singh Mohnot | 0.95 | 1 | 1 | 0.95 | 1 | 1 | 0.00 | 0 | 0 | 0 | 0 | 2.35% |
| Alpeshkumar Rasiklal Shah | 0.62 | 1 | 1 | 0.62 | 1 | 1 | 0.00 | 0 | 0 | 0 | 0 | 1.54% |
| Nirmala Jain | 0.10 | 2 | 2 | 0.15 | 1 | 1 | -0.05 | 1 | 1 | 0 | 0 | 0.37% |
| Waseem Ahmad | 0.00 | 100 | 1 | 0.00 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0 | 0.00% |
| **Total** | **25.35** | **230** | **110** | **40.35** | **84** | **69** | **-15.00** | **30** | **28** | **16** | **12** | **100.00%** |
| **Market Total** | **25.35** | **230** | **110** | **40.35** | **84** | **69** | **-15.00** | **30** | **28** | **16** | **12** | **100.00%** |

15.2 Top 9 LTP contributors among buyers contributed Rs.25.35 to net LTP and and Rs.40.35 to total market positive LTP. It was observed that Nishant Jain (Noticee 1) was the top LTP contributor with contribution of Rs.14.40 to net LTP and Rs.29.35 to total market positive LTP.

16. **LTP Analysis of Group I entities (price rise)**

The analysis of LTP was carried out to see any manipulation in price of the scrip from its previously traded price have taken place and the details are given below:

16.1 It was observed that on February 22, 2016, first trade was executed in the scrip in the Exchange by virtue of Jaipur Infragold Pvt Ltd (Noticee 5) selling 100 quantity of shares which was matched with the already existing buy order placed by an entity namely, Waseem Ahmad. The trade was executed during the pre-open session at the rate of Rs.12.50 and no trades took place thereafter on that day.

16.2 During Patch I (Table 18 point 1), it was observed that the price of the scrip opened at Rs 12.50 and moved to high of Rs 37.85, closing at the same price. Thus, price increased by 202.8%. The price of Rs. 12.50 was set as equilibrium price on February 22, 2016. Since this is a price rise patch, LTP analysis was carried out on the buy side. Details of the analysis of trades carried out by Group I entities, during this patch is as follows:

Table 20

| | All trades | | | Positive LTP trades | | | Negative LTP trades | | | Zero LTP trades | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Client Name | Ltp Rate | Traded Qty | No. Of Trades | Ltp Rate | Traded Qty | No. Of Trades | Ltp Rate | Traded Qty | No. Of Trades | Traded Qty | No. Of Trades | |
| Nishant Jain | 14.40 | 93 | 86 | 29.35 | 58 | 54 | -14.95 | 29 | 27 | 6 | 5 | 72.74% |
| Nirmala Jain | 0.10 | 2 | 2 | 0.15 | 1 | 1 | -0.05 | 1 | 1 | 0 | 0 | 0.37% |
| **Total** | **14.50** | **95** | **88** | **29.50** | **59** | **55** | **-15.00** | **30** | **28** | **6** | **5** | **73.11%** |
| **Market total** | **25.35** | **230** | **110** | **40.35** | **84** | **69** | **-15.00** | **30** | **28** | **16** | **12** | **100.00%** |

16.3 During the prise rise, it was observed that the two Group I entities, namely, Nishant Jain (Noticee 1) and Nirmala Jain together contributed Rs.14.50 to net LTP and Rs. 29.50 to the positive LTP which is 73.11% of market positive LTP. Noticee 1 and Nirmala Jain together contributed Rs. 14.40 and Rs. 0.10 to net LTP which is 57.20% of net market LTP. Observations on analysis of trades by Noticee 1 are given in the subsequent paragraphs.

16.4 Trades carried out by Noticee 1 contributed Rs.14.40 to net LTP in 86 trades and Rs.29.35 to positive LTP in 54 positive LTP trades. On analysing the counterparties to the positive LTP trades, it was observed that in all the 54 positive LTP trades, the counterparty was Jaipur Infragold Private Limited (Noticee 5) with both entities trading 1-3 shares in each trade. The entities through trades between themselves contributed 72.74% to market positive LTP.

16.5 Order analysis showed that, out of total 158 trading days, for 59 trading days, Noticees 1 and 5 were the only entities who placed orders. Further, it is also observed that for 41 trading days, Noticee 1 was the only entity placing orders in the scrip. Thus, it was observed that for 100 out of 158 trading days, the orders were placed either by only Noticee 1 or by both Noticees 1 and 5.

16.6 On analysing orders placed by Noticee 5, it was observed that during the period from 22.02.2016 to 16.01.2017, there were sell orders for total 284 shares out of which orders for 271 shares were placed by Noticee 5 and on all days, sell orders were placed for 1-3 shares except for first day of trading i.e. February 22, 2016 wherein sell order of 100 shares were placed and the buyer was Waseem Ahmed.

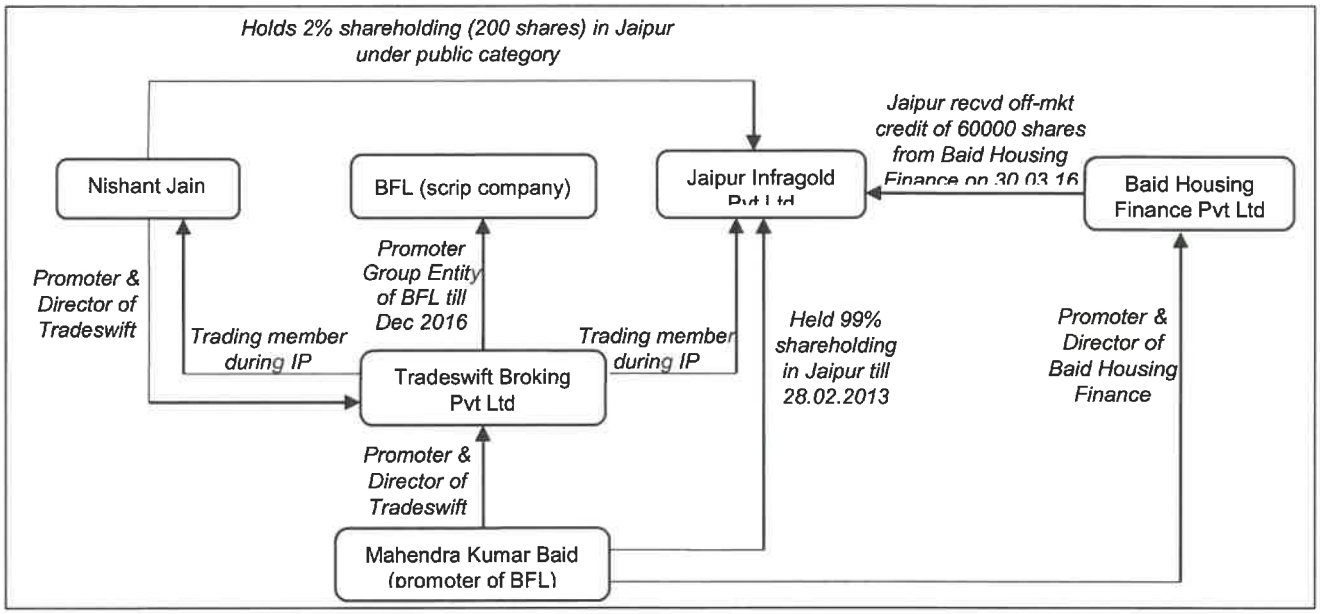
16.7 With regards to the trade done on February 22, 2016, it was observed that the shares of the company were listed on BSE w.e.f. February 18, 2016. No trade was executed on February 18 & 19, 2016, due to unavailability of sell orders in the system. On analysing orders, it was observed that Noticee 5 was the only seller in the market on February 22, 2016 during the special pre-open session and equilibrium price was established on February 22, 2016 at Rs.12.50 for 100 shares. The buyer was Waseem Ahmad. Hence, it was observed that Noticee 5 was instrumental in establishing Equilibrium price for the scrip.

16.8 From transaction cum holding statement obtained from CDSL vide email dated 23.09.2020 **(Annexure 8)**, it was observed that Noticee 5 held 82500 shares as on 01.01.2016. Hence, even though Noticee 5 had sufficient balance of shares available with it and irrespective of available buy order quantity in the system pending execution, it was observed that it had placed only single quantity sell order every time.

16.9 It was observed that both Noticees 1 and 5 had traded through the same trading member, Tradeswift Broking Private Limited and from the same location, i.e., 4th floor, Baid house ,1 Tara Nagar, Ajmer road, Jaipur, Rajasthan 302006 and the same terminal IDs.

16.10 From an email from BSE dated 16.10.2020 and 23.02.2021, it was observed that Noticee 1 is one of the designated directors of Tradeswift Broking Pvt Ltd **(Annexure 9)**. It was also observed that Mahendra Kumar Baid, promoter of BFL-1, is a designated director of Tradeswift Broking Pvt Ltd. From Director's report for FY 2015-16 and FY 2016-17 from MCA Website, it was noted that Nishant Jain (Noticee 1) and Mahendra Kumar Baid are also the promoters of Tradeswift Broking Pvt Ltd **(Annexure 10)** and further, Tradeswift Broking Pvt Ltd was one of the promoter group entities of BFL as on quarter ended December 2016. From list of shareholders from MCA Website, it was observed that Noticee 1 holds 200 shares i.e. 2% shareholding under public category in Jaipur Infragold Private Limited (Noticee 5) as on 31.03.2016 till latest shareholding as on 31.03.2019 **(Annexure 11)**. From the KYC of Noticee 5 obtained from the trading member viz. Tradeswift Broking Private Ltd vide email dated 08.06.2020, it was observed that Mahendra Kumar Baid, promoter of BFL-1, held 99% shareholding in Jaipur Infragold Private Ltd (Noticee 5) as on 28.02.2013 **(Annexure 12)**. Further, Noticee 5 received off-market transfer of 60000 shares of BFL-1 from Baid Housing Finance Private Limited, part

of Baid Group of companies **(Annexure 13)**. Hence, it has been alleged that Jaipur Infragold Private Limited (Noticee 5) is a company-connected entity. Pictorial representation of connection among the entities is given below:




16.11 It was observed that Noticee 5, despite having shareholding of 82500 shares as on 01.01.2016, chose to sell only 1-3 shares per trading day and that too dealt with only a company connected person. Therefore, it is alleged that by executing trades of miniscule quantity in a sustained manner for a considerable period wherein such miniscule quantities were the only trades executed for the major part of the said period, such trades were not genuine and were executed only with a manipulative intent to maintain and sustain the scrip price. It is therefore alleged that the trades of Nishant Jain (Noticee 1) and Jaipur Infragold Private Limited (Noticee 5) were manipulative in nature.

16.12 It was observed that trades of Rajiv Maheshwari (Noticee 6), trading through Religare Securities Ltd, contributed Rs.5.08 (i.e. 12.59% to market positive LTP) through 7 trades. The entity contributed Rs. 5.08 (i.e. 20.04% to net market LTP) through 7 trades. The counterparty to the trades was Jaipur Infragold Private Limited (Noticee 5). It was also observed that in all the 7 trades, the buy orders were placed before sell orders and were limit orders in nature. Details of trades are given below:

Table 21

| Trade date | PAN | Client name | Cp_PAN | Cp client name | Order time | Cp order time | Trade rate | Ltp rate | Trd qty | Order qty | Cp order qty |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 23/02/16 | AAAPM1959Q | Rajiv Maheshwari | AACCJ8693D | Jaipur Infragold P Ltd | 09:00:00.19 | 14:53:30.93 | 13.77 | 0.65 | 1 | 5 | 1 |
| 24/02/16 | AAAPM1959Q | -do- | AACCJ8693D | -do- | 09:00:00.27 | 14:13:32.47 | 14.45 | 0.68 | 1 | 5 | 1 |
| 26/02/16 | AAAPM1959Q | -do- | AACCJ8693D | -do- | 09:00:00.49 | 14:59:11.11 | 15.17 | 0.72 | 1 | 3 | 1 |
| 29/02/16 | AAAPM1959Q | -do- | AACCJ8693D | -do- | 09:00:00.44 | 14:39:25.97 | 15.92 | 0.75 | 1 | 3 | 1 |
| 01/03/16 | AAAPM1959Q | -do- | AACCJ8693D | -do- | 09:00:00.04 | 14:55:59.28 | 16.7 | 0.78 | 1 | 2 | 1 |
| 02/03/16 | AAAPM1959Q | -do- | AACCJ8693D | -do- | 09:00:00.37 | 14:55:04.15 | 17.5 | 0.80 | 1 | 2 | 1 |
| 03/03/16 | AAAPM1959Q | -do- | AACCJ8693D | -do- | 09:00:00.70 | 14:42:24.66 | 18.2 | 0.70 | 1 | 2 | 1 |

16.13 It was observed from order log analysis that in all 7 trades of Rajiv Maheshwari (Noticee 6), he had placed first order for the day and had bought miniscule quantity at rate higher than LTP. During the investigation period, the market positive LTP was Rs. 117.5, out of which Rajiv Maheshwari (Noticee 6) had contributed Rs. 5.08 through 7 trades. It was also observed that Rajiv Maheshwari (Noticee 6) had placed orders for purchase on seven distinctive days with miniscule quantity on each day and further, he had placed orders first every day and that too by increasing its price each day compared to its previous day's price and for all these days, the counter party seller was one of the Group I entities only. On account of the aforesaid trading pattern analysis, it is alleged that Rajiv Maheshwari (Noticee 6) had carried out manipulative trades by increasing the price of the scrip of BFL-1. Therefore, it is alleged that Rajiv Maheshwari (Noticee 6) has violated provisions of Section 12A (a), (b), (c) of SEBI Act, Regulations 3 (a), (b), (c) and (d) and 4(1), 4(2) (a) and (e) of PFUTP Regulations.

## 17. New High Price (NHP) Analysis of Group I entities

17.1 It was observed that, during this period, price of the scrip moved from open price of Rs.12.5 to a high price of Rs.37.85 and Rs.25.35 NHP was created. Details of NHP contributed by top 10 entities by NHP contribution are given below:

Table 22

| Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market NHP |
|---|---|---|---|---|
| Nishant Jain | 29 | 26 | 16.80 | 66.27% |
| Rajiv Maheshwari | 7 | 7 | 5.08 | 20.04% |

| Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market NHP |
|---|---|---|---|---|
| Meenu Gupta | 13 | 2 | 1.80 | 7.10% |
| Shripal Singh Mohnot | 1 | 1 | 0.95 | 3.75% |
| Alpeshkumar Rasiklal Shah | 1 | 1 | 0.62 | 2.45% |
| Nirmala Jain | 1 | 1 | 0.10 | 0.39% |
| **Total** | **52** | **38** | **25.35** | **100.00%** |
| **Market Total** | **52** | **38** | **25.35** | **100.00%** |

17.2 It was observed from the above table that only 6 entities contributed Rs.25.35 to market NHP which was 100.00% of market NHP.

17.3 Details of NHP analysis of trades carried out by Group I entities as buyers, with positive impact on LTP, during the patch is given below:

Table 23

| Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market Nhp | Contribution Among Group | Contribution To Nhp In Buy Order First Trades With Non Group Entities |
|---|---|---|---|---|---|---|
| Nishant Jain | 29 | 26 | 16.80 | 66.27% | 16.80 | 0 |
| Nirmala Jain | 1 | 1 | 0.10 | 0.39% | 0.10 | 0 |
| **Total** | **30** | **27** | **16.90** | **66.67%** | **16.90** | **0.00** |
| **Market total** | **52** | **38** | **25.35** | **100.00%** | **16.90** | **0.00** |

17.4 It was observed that Noticee 1 and Nirmala Jain contributed Rs.16.80 and Rs. 0.10 respectively to market NHP which was 66.67% of market NHP. The counterparty to the trades was Jaipur Infragold Private Limited (Noticee 5). Trades of Noticee 1 and 5 have been already discussed at previous paragraphs.

17.5 It was observed that, trades of Rajiv Maheshwari (Noticee 6) contributed Rs.5.08 (i.e. 28.22% to market NHP) through 7 trades. The counterparty to the trades was Jaipur Infragold Private Limited (Noticee 5). Trades of Noticee 6 have been already analysed in previous paragraphs.

## 18. First Trade Analysis of Group I entities:

18.1 As observed in invstigation, details of first trades as buyer by top 10 entities by number of first trades as buyer during the patch are given below:

Table 24

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At +ve Ltp | Net Ltp | Positive Ltp |
|---|---|---|---|---|---|
| Nishant Jain | 78 | 80 | 50 | 13.25 | 26.50 |
| Rajiv Maheshwari | 7 | 7 | 7 | 5.08 | 5.08 |
| Meenu Gupta | 2 | 13 | 2 | 1.90 | 1.90 |

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At +ve Ltp | Net Ltp | Positive Ltp |
|---|---|---|---|---|---|
| Anantheshwar Pai Uppinangady | 2 | 2 | 2 | 1.00 | 1.00 |
| Shripal Singh Mohnot | 1 | 1 | 1 | 0.95 | 0.95 |
| Nirmala Jain | 1 | 1 | 0 | -0.05 | 0.00 |
| Saibal Kumar Dutt | 1 | 1 | 1 | 1.30 | 1.30 |
| Waseem Ahmad | 1 | 100 | 0 | 0.00 | 0.00 |
| **Total** | **93** | **205** | **63** | **23.43** | **36.73** |
| **Market Total** | **93** | **205** | **63** | **23.43** | **36.73** |

18.2 It was observed from the above table that there were only 8 entities who were buyers in 93 first trades and contributed Rs.36.73 to market positive LTP and Rs. 23.43 to net market LTP. The analysis of first trades carried out by Group I entities as buyers, with positive impact on LTP, during the patch is given below:

Table 25

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp | Number Of First Trades Among Group | Positive Ltp Contribution In First Trades Among Group |
|---|---|---|---|---|---|---|---|
| Nishant Jain | 78 | 80 | 50 | 13.25 | 26.50 | 77 | 26.50 |
| Nirmala Jain | 1 | 1 | 0 | -0.05 | 0.00 | 1 | 0.00 |
| **Total** | **79** | **81** | **50** | **13.20** | **26.50** | **78** | **26.50** |
| **Market total** | **93** | **205** | **63** | **23.43** | **36.73** | **78** | **26.50** |

18.3 It was observed that Noticee 1 and Nirmala Jain were buyers in 79 first trades and contributed Rs.26.50 to market positive LTP and Rs. 13.20 to net LTP. In 78 out of 79 first trades, the counterparty was Jaipur Infragold Private Limited (Noticee 5) and all the first trades were carried out only as single quantity orders. Trades of Noticee 1 and 5 have been already discussed at paragraphs above.

18.4 It was observed that First trades of Rajiv Maheshwari (Noticee 6) contributed Rs.5.08 to market positive LTP and net LTP through 7 trades. The counterparty to the trades was Jaipur Infragold Private Limited (Noticee 5). Trades of Rajiv Maheshwari (Noticee 6) have already been analysed and stated in paragraph above.

19. **Observations & Conclusions based on LTP, NHP and first trade analysis of Group I entities in Patch 1:**

19.1 **Nishant Jain (Noticee 1) and Jaipur Infragold Private Limited (Noticee 5):**

It was observed that for 100 trading days out of 158 trading days, the orders were placed either by only Noticee 1 or by both Noticees 1 and 5. It was seen that there were no other

investors trading in the scrip on these days consistently, thereby indicating that the scrip had not evinced interest for them. Therefore, it is alleged that in order to create a false and misleading appearance of trades in the market for the scrip daily, Noticees 1 and 5 had executed such single shares trades for these many days. Therefore, it was alleged that by executing trades of miniscule quantity in a sustained manner for a considerable period wherein such miniscule quantities were the only trades executed for the major part of the said period, such trades were not genuine and were executed only with a manipulative intent to maintain and sustain the scrip price. It is therefore alleged that the trades of Nishant Jain (Noticee 1) and Jaipur Infragold Private Limited (Noticee 5) were manipulative in nature.

19.2 On the basis of the aforesaid analysis, it is alleged that Noticees 1 and 5 manipulated the price of the scrip on BSE and thus indulged in an act which created a false or misleading appearance of trading in the scrip and therefore, it is alleged that Noticees 1 and 5 violated Section 12A(a), (b), (c) of SEBI Act and Regulations 3 (a), (b), (c), (d) and 4(1) & 4(2)(a) and (e) of PFUTP Regulations.

**Patch 2(January 18, 2017 to April 25, 2017):**

20. **LTP Analysis of Group I entities**

20.1 It was observed that, during Patch 2, price of the scrip opened at Rs 37.00 and moved to high of Rs 48.5 and closing at Rs.47.05. Thus, price increased by 27.16%. Details of the analysis of trades carried out by Group I entities during this patch is as follows:

Table 26

| Entity Name | All trades | | | LTP Diff. > 0 | | | LTP Diff < 0 | | | LTP Diff. = 0 | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Ltp Rate | Traded Qty | No. Of Trades | Ltp Rate | Traded Qty | No. Of Trades | Ltp Rate | Traded Qty | No. Of Trades | Traded Qty | No. Of Trades | |
| Dharmendra Jain Huf | 0.65 | 5220 | 37 | 1.85 | 1780 | 9 | -1.20 | 630 | 4 | 2810 | 24 | 4.17% |
| Anant Jain | 0.25 | 4480 | 39 | 0.65 | 690 | 4 | -0.40 | 1050 | 4 | 2740 | 31 | 1.46% |
| Kavita Jain | -1.15 | 6770 | 55 | 1.30 | 1670 | 9 | -2.45 | 1260 | 8 | 3840 | 38 | 2.93% |
| Sandeep Kumar Jain | -2.15 | 1880 | 15 | 0.20 | 580 | 3 | -2.35 | 780 | 6 | 520 | 6 | 0.45% |
| Dharmendra Kumar Jain | -3.70 | 8974 | 77 | 2.00 | 2870 | 20 | -5.70 | 2770 | 20 | 3334 | 37 | 4.50% |
| Pradeep Kumar Jain | -5.00 | 13148 | 135 | 5.40 | 2912 | 25 | -10.40 | 2946 | 32 | 7290 | 78 | 12.16% |
| **Total** | **-11.10** | **40472** | **358** | **11.40** | **10502** | **70** | **-22.50** | **9436** | **74** | **20534** | **214** | **25.68%** |
| **Market total** | **9.20** | **78900** | **1004** | **44.40** | **25072** | **267** | **-35.20** | **14277** | **135** | **39551** | **602** | **100.00%** |

20.2 It was observed that, the entities belonging to Group I contributed Rs.11.40 to positive LTP (i.e. 25.68% to positive LTP) in 70 positive LTP trades and as a group, contributed negative of -Rs. 11.10 to net LTP in 358 trades. Analysis of positive LTP trades of Group I entities showed that in 64 out of 70 positive LTP trades, the counterparties were group entities and through trades among themselves contributed 21.96% to market positive LTP. In remaining 6 positive LTP trades with non-group entities, they contributed 3.72% to market positive LTP.

20.3 The details of trading by Group I entities during Patch 2 are as under:

Table 27

| Entity Name | Buy Traded Qty | %Buytq | Sell Traded Qty | %Selltq | Net Buy Position |
|---|---|---|---|---|---|
| Pradeep Kumar Jain | 13148 | 16.66% | 12140 | 15.39% | 1008 |
| Dharmendra Kumar Jain | 8974 | 11.37% | 8706 | 11.03% | 268 |
| Kavita Jain | 6770 | 8.58% | 6740 | 8.54% | 30 |
| Dharmendra Jain Huf | 5220 | 6.62% | 5220 | 6.62% | 0 |
| Anant Jain | 4480 | 5.68% | 4450 | 5.64% | 30 |
| Sandeep Kumar Jain | 1880 | 2.38% | 1880 | 2.38% | 0 |
| Jaipur Infragold Private Limited | 0 | 0.00% | 3180 | 4.03% | -3180 |
| **Total** | **40472** | **51.30%** | **42316** | **53.63%** | **-1844** |
| **Market total** | **78900** | **100.00%** | **78900** | **100.00%** | |

20.4 It was observed from the above table that entities belonging to Group I contributed 51.30% to buy volume and 53.63% to sell volume and thereby contributed 47.40% to market volume through trades amongst the group. Observations on analysis of trades by Dharmendra Jain HUF (Noticee 4), Pradeep Kumar Jain (Noticee 2), Dharmendra Kumar Jain (Noticee 3), and Jaipur Infragold Private Limited (Noticee 5) are discussed in the subsequent paragraphs.

20.5 It was observed that trades carried out by Dharmendra Jain HUF (Karta being Dharmendra Kumar Jain (Noticee3)), trading through Amrapali Aadhya Trading & Investments Private Limited, contributed Rs. 1.85 to positive LTP (i.e. 4.17% to market positive LTP) through 9 trades. Dharmendra Jain HUF (Noticee 4) contributed Rs. 0.65 to net LTP (i.e. 7.07% to net LTP) through 37 trades.

20.6 Connection of Dharmendra Jain HUF (Noticee 4) with other Group I entities/promoters or directors of the company is already given in Table 3 above and copy of KYC is given as **Annexure 14**. From transaction cum holding statement provided by CDSL vide email dated

23.09.2020 (**Annexure 8**), it was observed that the entity had no shareholding in the scrip of BFL-1 prior to its trades in Patch 2.

20.7 On analyzing the entire trades done by Dharmendra Jain HUF (Noticee 4) during patch 2, it was observed that Dharmendra Jain HUF (Noticee 4) purchased a total of 5220 shares in 37 trades and sold 5220 shares as seller in 34 trades i.e. net position of Dharmendra Jain HUF (Noticee 4) was zero in patch 2. As buyer, the counterparties of Dharmendra Jain HUF (Noticee 4) were four Group I entities namely, Anant Jain, Kavita Jain, Pradeep Kumar Jain, Dharmendra Kumar Jain (Noticee 3) and two non-suspected entities namely, Kanta Parewa and Thar Commodities Pvt Ltd. As seller, the counterparties of Dharmendra Jain HUF (Noticee 4) were four Group I entities namely, Kavita Jain, Pradeep Kumar Jain (Noticee 2), Anant Jain, Dharmendra Kumar Jain (Noticee 3) and one non-suspected entity namely, Thar Commodities Private Limited. It was observed that as buyer, Dharmendra Jain HUF (Noticee 4) placed buy order first in 31 out of 37 trades and as seller, Dharmendra Jain HUF (Noticee 4) placed sell order before the buy order in 7 out of 34 trades. Trades of Dharmendra Jain HUF (Noticee 4) as buyer and seller are summarized in brief as given below:

Table 28

| As buyer | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Total No of trading days** | **Total No of trades** | **No of trades with suspected entities** | **No of trading days with only Suspected entities** | **No of trading days with only Non-suspected entities** | **No of trading days with both suspected and non-suspected entities** | **No of shares traded with suspected entities** | **No of shares traded with non-suspected entities** | **Positive LTP (Rs.)** | **Net LTP (Rs.)** |
| 13 | 37 | 33 | 11 | 0 | 2 | 4740 | 480 | 1.85 | 0.65 |
| **As seller** | | | | | | | | | |
| **Total No of trading days** | **Total No of trades** | **No of trades with suspected entities** | **No of trading days with only Suspected entities** | **No of trading days with only Non-suspected entities** | **No of trading days with both suspected and non-suspected entities** | **No of shares traded with suspected entities** | **No of shares traded with non-suspected entities** | **Positive LTP (Rs.)** | **Net LTP (Rs.)** |
| 14 | 34 | 33 | 13 | 0 | 1 | 5040 | 180 | 1.15 | -0.80 |

20.8 From the above table, it was observed that trades of Dharmendra Jain HUF (Noticee 4) were done only with Group I entities for 33 out of 37 number of buy trades and for 33 out of 34 number of sell trades.

20.9 It was observed that, trades carried out by Dharmendra Kumar Jain (Noticee 3), trading through Hindustan Tradecom Private Ltd, contributed Rs. 2.00 to positive LTP (i.e. 4.5% to

market positive LTP) through 20 trades. Dharmendra Kumar Jain (Noticee 3) contributed – Rs. 3.70 to net LTP through 77 trades. Dharmendra Kumar Jain (Noticee 3) have done reversal trades on two days namely 13.02.2017 and 16.02.2017 and contributed to 0.24% to market volume.

20.10 Connection of Dharmendra Kumar Jain (Noticee 3) with other Group I entities/ promoters or directors of the company is already given in Table 3 above copy of KYC of Dharmendra Kumar Jain (Noticee 3) is placed as **Annexure 15**. From transaction cum holding statement provided by CDSL vide email dated 23.09.2020 (**Annexure 8**), it was observed that Dharmendra Kumar Jain (Noticee 3) had no shareholding in the scrip of BFL-1 prior to the trades in patch 2.

20.11 On analysing the entire trades done by Dharmendra Kumar Jain (Noticee 3) during patch 2, it was observed that Dharmendra Kumar Jain (Noticee 3) purchased a total of 8974 shares in 77 trades and sold 8706 shares as seller in 70 trades i.e. Dharmendra Kumar Jain (Noticee 3) had a balance of 268 shares. As a buyer, the counterparties to Dharmendra Kumar Jain (Noticee 3) were six Group I entities namely, Anant Jain, Dharmendra Jain HUF (Noticee 4), Pradeep Kumar Jain (Noticee 2), Sandeep Kumar Jain, Kavita Jain, Jaipur Infragold Pvt Ltd (Noticee 5) and 2 non-suspected entities namely, Tribhovandas Praja and Sogarth Mukhiya. As seller, the counterparties of Dharmendra Kumar Jain (Noticee 3) were six Group I entities namely, Pradeep Kumar Jain (Noticee 2), Kavita Jain, Anant Jain, Dharmendra Jain HUF (Noticee 4), Sandeep Kumar Jain and 1 non-suspected entity, namely, Thar Commodities Pvt Ltd. As a buyer, Dharmendra Kumar Jain (Noticee 3) placed buy orders first in 70 out of 77 buy trades and as seller, Noticee 3 placed sell orders before buy order for 22 out of 70 trades. Trades of Dharmendra Kumar Jain (Noticee 3) as buyer and seller are summarized in brief as given below:

Table 29

| **As buyer** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Total No of trading days** | **Total No of trades** | **No of trades with suspected entities** | **No of trading days with only Suspected entities** | **No of trading days with only Non-suspected entities** | **No of trading days with both suspected and non-suspected entities** | **No of shares traded with suspected entities** | **No of shares traded with non-suspected entities** | **Positive LTP (Rs.)** | **Net LTP (Rs.)** |
| 34 | 77 | 43 | 31 | 0 | 3 | 8654 | 320 | 2.00 | -3.70 |
| **As seller** | | | | | | | | | |

| Total No of trading days | Total No of trades | No of trades with suspected entities | No of trading days with only Suspected entities | No of trading days with only Non-suspected entities | No of trading days with both suspected and non-suspected entities | No of shares traded with suspected entities | No of shares traded with non-suspected entities | Positive LTP (Rs.) | Net LTP (Rs.) |
|---|---|---|---|---|---|---|---|---|---|
| 31 | 70 | 66 | 28 | 2 | 1 | 7856 | 850 | 2.15 | -3.75 |

20.12 From the above table, it was observed that trades of Dharmendra Kumar Jain (Noticee 3) were done only with Group I entities for 43 out of 77 number of buy trades and for 66 out of 70 number of sell trades.

20.13 It has been observed that, trades carried out by Noticee 2, trading through Tradeswift Broking Private Limited, contributed Rs. 5.4 to positive LTP (i.e. 12.16% to market positive LTP) through 25 trades. Noticee 2 contributed –Rs. 5.00 to net LTP through 135 trades. Further, it was observed that Nishant Jain (Noticee 1), promoter and director of Tradeswift Broking Private Limited, is the terminal user for all trades of Noticee 2.

20.14 Connection of Noticee 2 with other suspected entities/ promoters or directors of the company is already given in Table 3 above copy of KYC of Pradeep Kumar Jain (Noticee 2) obtained vide email dated 08.06.2020 is placed as **Annexure 16**. From transaction cum holding statement provided by CDSL vide email dated 23.09.2020, it was observed that Noticee 2 had no shareholding in the scrip of BFL Asset Finvest Ltd prior to the trades in patch 2.

20.15 On analysing the entire trades done by Noticee 2 during patch 2, it was observed that Noticee 2 purchased a total of 13148 shares in 135 trades and sold 12140 shares as seller in 210 trades i.e. Noticee 2 had a balance of 268 shares. As buyer, the counterparties to Noticee 2 were 5 suspected entities namely, Anant Jain, Dharmendra jain HUF (Noticee 4), Dharmendra Kumar Jain (Noticee 3), Kavita Jain, Sandeep Kumar Jain and 7 non-suspected entities namely, Babulal Hansraj Lakhani, Jayantibhai Tribhovandas Praja, Kanta Parewa, Parvinder Azad, Santhosh Nathu Kangode, Sogarth Mukhiya and Thar Commodities Pvt Ltd. As seller, the counterparties to Noticee 2 were 5 suspected entities namely, Sandeep Kumar Jain, Dharmendra Kumar Jain (Noticee 3), Kavita Jain, Anant Jain, Dharmendra Jain HUF (Noticee 4) and 19 non-suspected entities. As buyer, Noticee 2 placed buy order before sell order for 99 out of 135 buy trades and as seller, the sell order was placed before buy order for 75 out of 210 sell trades. Trades of Noticee 2 as buyer and seller are summarized in brief as given below:

*Table 30*

| As buyer | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Total No of trading days | Total No of trades | No of trades with suspected entities | No of trading days with only Suspected entities | No of trading days with only Non-suspected entities | No of trading days with both suspected and non-suspected entities | No of shares traded with suspected entities | No of shares traded with non-suspected entities | Positive LTP (Rs.) | Net LTP (Rs.) |
| 39 | 135 | 112 | 28 | 2 | 9 | 11682 | 1466 | 5.40 | -5.00 |
| **As seller** | | | | | | | | | |
| Total No of trading days | Total No of trades | No of trades with suspected entities | No of trading days with only Suspected entities | No of trading days with only Non-suspected entities | No of trading days with both suspected and non-suspected entities | No of shares traded with suspected entities | No of shares traded with non-suspected entities | Positive LTP (Rs.) | Net LTP (Rs.) |
| 45 | 210 | 127 | 36 | 9 | 22 | 9880 | 2260 | 2.15 | 8.90 |

20.16 From the above table, it was observed that trades of Noticee 2 were done only with Group I for 112 out of 135 buy trades and for 127 out of 210 sell trades.

20.17 It was observed that Noticee 5 had been trading through Tradeswift Broking Pvt Ltd, sold total of 3180 shares through 27 trades in 3 trading days, out of which 2050 shares i.e. 70.13% of its shares were sold through 16 trades to Sandeep Kumar Jain, Dharmendra Kumar Jain (Noticee 3), Kavita Jain and Anant Jain, who are part of group of entities belonging to Group I. Remaining 1130 shares were sold through 11 trades to 3 non-suspected entities namely, Kanta Parewa, Thar Commodities Private Ltd and Vijay Lata Bhandari.

## 21. LTP Analysis of Group II

21.1 Analysis of trades of top 10 positive contributors to LTP in patch 2 was done which is given hereunder:

*Table 31*

| Entity name | All trades | | | LTP Diff. > 0 | | | LTP Diff. < 0 | | | LTP Diff=0 | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Ltp Rate | Traded Qty | No Trades | Ltp Rate | Traded Qty | No Trades | Ltp Rate | Traded Qty | No Trades | Traded Qty | No Trades | |
| Joseph Williams | 2.45 | 110 | 7 | 3.30 | 100 | 6 | -0.85 | 10 | 1 | 0 | 0 | 7.43% |
| Bhagavatiben Vishnubhai Patel | 2.20 | 5401 | 98 | 6.00 | 2095 | 23 | -3.80 | 1251 | 18 | 2055 | 57 | 13.51% |
| Vinod Solanki | 2.00 | 4276 | 67 | 2.80 | 2225 | 28 | -0.80 | 385 | 7 | 1666 | 32 | 6.31% |
| Raj Kumari Hirawat | 2.00 | 500 | 22 | 3.55 | 375 | 17 | -1.55 | 20 | 1 | 105 | 4 | 8.00% |
| Jayantibhai Tribhovandas Praja | 1.75 | 170 | 10 | 1.75 | 120 | 7 | 0.00 | 0 | 0 | 50 | 3 | 3.94% |
| Lalit Kumar Malhotra | 1.45 | 209 | 9 | 1.45 | 189 | 7 | 0.00 | 0 | 0 | 20 | 2 | 3.27% |
| Lovely Williams | 1.25 | 100 | 4 | 1.25 | 100 | 4 | 0.00 | 0 | 0 | 0 | 0 | 2.82% |
| Bharti Sharma | 1.20 | 5917 | 88 | 1.35 | 2114 | 21 | -0.15 | 300 | 3 | 3503 | 64 | 3.04% |
| Babulal Hansraj Lakhani | 1.20 | 2244 | 35 | 1.45 | 1113 | 13 | -0.25 | 249 | 2 | 882 | 20 | 3.27% |
| Ranjeet Singh Bhandari | 1.10 | 15 | 3 | 1.10 | 15 | 3 | 0.00 | 0 | 0 | 0 | 0 | 2.48% |
| **Total** | **16.60** | **18942** | **343** | **24.00** | **8446** | **129** | **-7.40** | **2215** | **32** | **8281** | **182** | **54.05%** |
| **Market Total** | **9.20** | **78900** | **1004** | **44.40** | **25072** | **267** | **-35.20** | **14277** | **135** | **39551** | **602** | **100.00%** |

21.2 It was observed that, during the price rise patch, top 10 entities contributed Rs. 16.60 to net LTP and Rs. 24.00 to positive LTP which is 54.05% to market positive LTP.

21.3 Details of the analysis of trades carried out by Group II entities during this patch was as follows:

***Table 32***

| | All trades | | | Positive LTP trades | | | Negative LTP trades | | | Zero LTP trades | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Entity Name** | **Ltp Rate** | **Traded Qty** | **No. Of Trades** | **Ltp Rate** | **Traded Qty** | **No. Of Trades** | **Ltp Rate** | **Traded Qty** | **No. Of Trades** | **Traded Qty** | **No. Of Trades** | |
| Bhagavatiben Vishnubhai Patel | 2.20 | 5401 | 98 | 6.00 | 2095 | 23 | -3.80 | 1251 | 18 | 2055 | 57 | 13.51% |
| Vinod Solanki | 2.00 | 4276 | 67 | 2.80 | 2225 | 28 | -0.80 | 385 | 7 | 1666 | 32 | 6.31% |
| Bharti Sharma | 1.20 | 5917 | 88 | 1.35 | 2114 | 21 | -0.15 | 300 | 3 | 3503 | 64 | 3.04% |
| Babulal Hansraj Lakhani | 1.20 | 2244 | 35 | 1.45 | 1113 | 13 | -0.25 | 249 | 2 | 882 | 20 | 3.27% |
| Dhirajbhai Baladevji Thakor | 0.85 | 6596 | 107 | 2.10 | 1057 | 11 | -1.25 | 1133 | 11 | 4406 | 85 | 4.73% |
| Jasmin Indu Shah | 0.55 | 400 | 4 | 0.55 | 299 | 2 | 0.00 | 0 | 0 | 101 | 2 | 1.24% |
| Pinesh Nareshkumar Shah | 0.25 | 2957 | 55 | 0.30 | 399 | 5 | -0.05 | 100 | 1 | 2458 | 49 | 0.68% |
| Roshanlal Daulatram Aggarwal | 0.15 | 200 | 2 | 0.15 | 200 | 2 | 0.00 | 0 | 0 | 0 | 0 | 0.34% |
| Suresh Piraji Marvadi | -0.15 | 200 | 3 | 0.05 | 100 | 1 | -0.20 | 50 | 1 | 50 | 1 | 0.11% |
| Mahendrabhai Naranbhai Patel | -0.20 | 967 | 18 | 0.00 | 0 | 0 | -0.20 | 133 | 2 | 834 | 16 | 0.00% |
| Ramanlal Ravchand Shah | -0.35 | 4151 | 67 | 1.40 | 1867 | 24 | -1.75 | 865 | 10 | 1419 | 33 | 3.15% |
| **Total** | **7.70** | **33309** | **544** | **16.15** | **11469** | **130** | **-8.45** | **4466** | **55** | **17374** | **359** | **36.37%** |
| **Market total** | **9.20** | **78900** | **1004** | **44.40** | **25072** | **267** | **-35.20** | **14277** | **135** | **39551** | **602** | **100.00%** |

21.4 It was observed that entities belonging to Group II contributed Rs.7.70 to net LTP and Rs.16.15 to positive LTP in 130 positive LTP trades. Counterparties to their positive LTP trades were analysed, it was observed that in their 129 positive LTP trades, the counterparties were group entities, trading for 11468 shares and through the 129 trades among themselves they contributed Rs. 16 i.e.36.04% to market positive LTP. In remaining 1 positive LTP trades with Pradeep Kumar Jain (Noticee 2), they contributed Rs.0.15 to positive LTP.

21.5 The trading of entities belonging to Group II during patch 2 is as given below:

***Table 33***

| Entity name | Buy Traded Qty | %Buytq | Sell Traded Qty | %Selltq | Net Position |
|---|---|---|---|---|---|
| Dhirajbhai Baladevji Thakor | 6596 | 8.36% | 6596 | 8.36% | |
| Bharti Sharma | 5917 | 7.50% | 5917 | 7.50% | |
| Bhagavatiben Vishnubhai Patel | 5401 | 6.85% | 5401 | 6.85% | |

| | | | | | |
|---|---|---|---|---|---|
| Vinod Solanki | 4276 | 5.42% | 4276 | 5.42% | 0 |
| Ramanlal Ravchand Shah | 4151 | 5.26% | 4151 | 5.26% | |
| Pinesh Nareshkumar Shah | 2957 | 3.75% | 2957 | 3.75% | |
| Babulal Hansraj Lakhani | 2244 | 2.84% | 2244 | 2.84% | |
| Mahendrabhai Naranbhai Patel | 967 | 1.23% | 967 | 1.23% | |
| Jasmin Indu Shah | 400 | 0.51% | 400 | 0.51% | |
| Roshanlal Daulatram Aggarwal | 200 | 0.25% | 200 | 0.25% | |
| Suresh Piraji Marvadi | 200 | 0.25% | 200 | 0.25% | |
| **Total** | **33309** | **42.22%** | **33309** | **42.22%** | |
| **Market total** | **78900** | **100.00%** | **78900** | **100.00%** | |

21.6 From the above, it was observed that, Group II entities contributed 42.22% to buy volume and 42.22% to sell volume and contributed 42.22% to market volume through trades among group. Further, net position of these entities was zero.

21.7 It was observed that, trades carried out by Noticee 10, trading through Swastika Investmart Limited, contributed Rs. 6 to positive LTP (i.e. 13.15% to market positive LTP) through 23 trades. Noticee 10 contributed Rs. 2.20 to net LTP (i.e. 23.91% to net LTP) through 98 trades.

21.8 On analysing the entire trades done by Noticee 10 during patch 2, it was observed that Noticee 10 purchased a total of 5401 shares in 98 trades and sold 5401 shares as seller in 89 trades i.e. the net position of Noticee 10 was zero. As buyer, the counterparties to Noticee 10 were 8 entities namely, Babulal Hansraj Lakhani (Noticee 7), Bharti Sharma (Noticee 12), Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15), Pinesh Nareshkumar Shah (Noticee 13), Ramanlal Ravchand Shah (Noticee 8), Roshanlal Daulatram Aggarwal and Vinod Solanki (Noticee 9), who are part of Group II. As seller, the counterparties to Noticee 10 were 8 entities namely, Babulal Hansraj Lakhani (Noticee 7), Bharti Sharma (Noticee 12), Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15), Pinesh Nareshkumar Shah (Noticee 13), Ramanlal Ravchand Shah (Noticee 8), Roshanlal Daulatram Aggarwal and Vinod Solanki (Noticee 9), who are part of Group II. As buyer, Noticee 10 placed buy order before sell order for 18 out of 98 buy trades and as seller, the sell order was placed before buy order for 53 out of 89 sell trades.

21.9 It was observed that, trades carried out by Noticee 9, trading through Berkeley Securities Limited, contributed Rs. 2.80 to positive LTP (i.e. 6.31% to market positive LTP) through 28 trades. Noticee 9 contributed Rs. 2.00 to net LTP (i.e. 21.74% to net LTP) through 67 trades.

21.10 On analysing the entire trades done by Noticee 9 during patch 2, it was observed that Noticee 9 purchased a total of 4276 shares in 67 trades and sold 4276 shares as seller in 71 trades i.e. the net position of Noticee 9 was zero. As buyer, the counterparties to Noticee

9 were 6 entities namely, Babulal Hansraj Lakhani (Noticee 7), Bhagavatiben Vishnubhai Patel (Noticee 10), Bharti Sharma (Noticee 12), Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15) and Ramanlal Ravchand Shah (Noticee 8), who are part of Group II. As seller, the counterparties to Noticee 9 were 6 entities namely, Babulal Hansraj Lakhani (Noticee 7), Bhagavatiben Vishnubhai Patel (Noticee 10), Bharti Sharma (Noticee 12), Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15) and Ramanlal Ravchand Shah (Noticee 8), who are part of Group II. As buyer, Noticee 9 placed buy order before sell order for 25 out of 67 buy trades and as seller, the sell order was placed before buy order for 65 out of 71 sell trades.

21.11 It was observed that, trades carried out by Noticee 12, trading through Tradebulls Securities Pvt Limited, contributed Rs. 1.35 to positive LTP (i.e. 3.04% to market positive LTP) through 21 trades. Noticee 12 contributed Rs. 1.20 to net LTP (i.e. 13.04% to net LTP) through 88 trades.

21.12 On analysing the entire trades done by Noticee 12 during patch 2, it was observed that Noticee 12 purchased a total of 5917 shares in 88 trades and sold 5917 shares as seller in 93 trades i.e. the net position of Noticee 12 was zero. As buyer, the counterparties to Noticee 12 were 8 entities namely, Babulal Hansraj Lakhani (Noticee 7), Jasmin Indu Shah (Noticee 14), Dhirajbhai Baladevji Thakor (Noticee 11), Bhagavatiben Vishnubhai Patel (Noticee 10), Vinod Solanki (Noitcee 9), Pinesh Nareshkumar Shah (Noticee 13), Mahendrabhai Naranbhai Patel (Noticee 15), Ramanlal Ravchand Shah (Noticee 8), who are part of Group II. As seller, the counterparties to Bharti Sharma were 8 entities namely, Jasmin Indu Shah (Noticee 14), Suresh Piraji Marvadi, Babulal Hansraj Lakhani (Noticee 7), Dhirajbhai Baladevji Thakor (Noticee 11), Bhagavatiben Vishnubhai Patel (Noticee 10), Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13), Mahendrabhai Naranbhai Patel (Noticee 15), Ramanlal Ravchand Shah (Noticee 8), who are part of Group II. As buyer, Noticee 12 placed buy order before sell order for 29 out of 88 buy trades and as seller, the sell order was placed before buy order for 72 out of 93 sell trades.

21.13 It was observed that, trades carried out by Noticee 7, trading through Veracity Financial Pvt Limited, contributed Rs. 1.45 to positive LTP (i.e. 3.27% to market positive LTP) through 13 trades. Noticee 7 contributed Rs. 1.20 to net LTP (i.e. 13.04% to net LTP) through 35 trades.

21.14 On analysing the entire trades done by Noticee 7 during patch 2, it was observed that Noticee 7 purchased a total of 2244 shares in 35 trades and sold 2244 shares as seller in 32 trades i.e. the net position of Noticee 7 was zero. As buyer, the counterparties to Noticee 7 were 8 entities namely, Suresh Piraji Marvadi, Dhirajbhai Baladevji Thakor (Noticee 11),

Bharti Sharma (Noticee 12), Pradeep Kumar Jain (Noticee 2), Bhagavatiben Vishnubhai Patel (Noticee 10), Roshanlal Daulatram Aggarwal, Ramanlal Ravchand Shah (Noticee 8), Vinod Solanki (Noticee 9), who are part of Group II. As seller, the counterparties to Noticee 7 were 7 entities namely, Bharti Sharma (Noticee 12), Jasmin Indu Shah (Noticee 14), Dhirajbhai Baladevji Thakor (Noticee 11), Bhagavatiben Vishnubhai Patel (Noticee 10), Pradeep Kumar Jain (Noticee 2), Ramanlal Ravchand Shah (Noticee 8), Vinod Solanki (Noticee 9), who are part of Group II. As buyer, Noticee 7 placed buy order before sell order for 1 out of 35 buy trades and as seller, the sell order was placed before buy order for 20 out of 32 sell trades.

21.15 It was observed that, trades carried out by Noticee 11, trading through NNM Securities Pvt Limited, contributed Rs. 2.10 to positive LTP (i.e. 4.73% to market positive LTP) through 11 trades. Noticee 11 contributed Rs. 0.85 to net LTP (i.e. 9.24% to net LTP) through 107 trades.

21.16 On analysing the entire trades done by Noticee 11 during patch 2, it was observed that Noticee 11 purchased a total of 6596 shares in 107 trades and sold 6596 shares as seller in 99 trades i.e. the net position of Noticee 11 was zero. As buyer, the counterparties to Noticee 11 were 9 entities namely, Jasmin Indu Shah (Noticee 14), Suresh Piraji Marvadi, Mahendrabhai Naranbhai Patel (Noticee 15), Babulal Hansraj Lakhani (Noticee 7), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10), Vinod Solanki (Noticee 9), Ramanlal Ravchand Shah (Noticee 8), Pinesh Nareshkumar Shah (Noticee 13), who are part of Group II. As seller, the counterparties to Noticee 11 were 9 entities namely, Suresh Piraji Marvadi, Babulal Hansraj Lakhani (Noticee 7), Bharti Sharma (Noticee 12), Roshanlal Daulatram Aggarwal, Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13), Ramanlal Ravchand Shah (Noticee 8), Bhagavatiben Vishnubhai Patel (Noticee 10), Mahendrabhai Naranbhai Patel (Noticee 15), who are part of Group II. As buyer, Noticee 11 placed buy order before sell order for 27 out of 107 buy trades and as seller, the sell order was placed before buy order for 69 out of 99 sell trades.

21.17 It was observed that, trades carried out by Noticee 14, trading through India Advantage Securities Pvt Limited, contributed Rs. 0.55 to positive LTP (i.e. 1.24% to market positive LTP) through 2 trades. Noticee 14 contributed Rs. 0.55 to net LTP (i.e. 5.98% to net LTP) through 4 trades.

21.18 On analysing the entire trades done by Noticee 14 during patch 2, it was observed that Noticee 14 purchased a total of 400 shares in 4 trades and sold 400 shares as seller in 4 trades i.e. the net position of Noticee 14 was zero. As buyer, the counterparties to Noticee

14 were 2 entities namely, Babulal Hansraj Lakhani (Noticee 7), Bharti Sharma (Noticee 12), who are part of Group II. As seller, the counterparties to Noticee 14 were 3 entities namely, Bharti Sharma (Noticee 12), Dhirajbhai Baladvji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15), who are part of Group II. As buyer, Noticee 14 placed buy order before sell order for 1 out of 4 buy trades and as seller, the sell order was placed before buy order for 3 out of 4 sell trades.

21.19 It was observed that, trades carried out by Noticee 13, trading through Marfatia Stock Broking Pvt Limited, contributed Rs. 0.30 to positive LTP (i.e. 0.68% to market positive LTP) through 5 trades. Noticee 13 contributed Rs. 0.25 to net LTP (i.e. 2.72% to net LTP) through 55 trades.

21.20 On analysing the entire trades done by Noticee 13 during patch 2, it was observed that Noticee 13 purchased a total of 2957 shares in 55 trades and sold 2957 shares as seller in 66 trades i.e. the net position of Noticee 13 was zero. As buyer, the counterparties to Noticee 13 were 5 entities namely, Ramanlal Ravchand Shah (Noticee 8), Bharti Sharma (Noticee 12), Dhirajbhai Baladevji Thakor (Noticee 11), Bhagavatiben Vishnubhai Patel (Noticee 10), Mahendrabhai Naranbhai Patel (Noticee 15), who are part of Group II. As seller, the counterparties to Noticee 13 were 5 entities namely, Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Ramanlal Ravchand Shah (Noticee 8), Bhagavatiben Vishnubhai Patel (Noticee 10), Mahendrabhai Naranbhai Patel (Noticee 15), who are part of Group II. As buyer, Noticee 13 placed buy order before sell order for 17 out of 55 buy trades and as seller, the sell order was placed before buy order for 53 out of 66 sell trades.

21.21 Trades carried out by Noticee 15, trading through Guiness Securities Limited, did not contribute to positive LTP. Noticee 15 contributed - Rs. 0.20 to net LTP (i.e. -2.17% to net LTP) through 18 trades.

21.22 On analysing the entire trades done by Noticee 15 during patch 2, it was observed that Noticee 15 purchased a total of 967 shares in 18 trades and sold 967 shares as seller in 15 trades i.e. the net position of Noticee 15 was zero. As buyer, the counterparties to Noticee 15 were 7 entities namely, Jasmin Indu Shah (Noticee 14), Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13), Ramanlal Ravchand Shah (Noticee 8), Bhagavatiben Vishnubhai Patel (Noticee 10), Bharti Sharma (Noticee 12), Dhirajbhai Baladevji Thakor (Noticee 11), who are part of Group II. As seller, the counterparties to Noticee 15 were 6 entities namely, Dhirajbhai Baladevji Thakor (Noticee 11), Pinesh Nareshkumar Shah (Noticee 13), Ramanlal Ravchand Shah (Noticee 8), Bhagavatiben Vishnubhai Patel (Noticee 10), Bharti Sharma (Noticee 12), Vinod Solanki (Noticee 9), who

are part of Group II. As buyer, Noticee 15 placed buy orders before sell order for 9 out of 18 buy trades and as seller, the sell order was placed before buy order for 9 out of 15 sell trades.

21.23 It was observed that, trades carried out by Noticee 8, trading through R.K. Stock Holding Pvt Ltd, Rs. 1.40 to positive LTP (i.e. 3.15% to market positive LTP) through 24 trades. Noticee 8 contributed -Rs. 0.20 to net LTP (i.e. -3.80% to net LTP) through 67 trades.

21.24 On analysing the entire trades done by Noticee 8 during patch 2, it was observed that Noticee 8 purchased a total of 4151 shares in 67 trades and sold 4151 shares as seller in 69 trades i.e. the net position of Noticee 8 was zero. As buyer, the counterparties to Noticee 8 were 7 entities namely, Bhagavatiben Vishnubhai Patel (Noticee 10), Babulal Hansraj Lakhani (Noticee 7), Vinod Solanki (Noticee 9), Pinesh Nareshkumar Shah (Noticee 13), Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15), Bharti Sharma (Noticee 12), who are part of Group II. As seller, the counterparties to Noticee 8 were 7 entities namely, Babulal Hansraj Lakhani (Noticee 7), Bhagavatiben Vishnubhai Patel (Noticee 10), Vinod Solanki (Noticee 9), Dhirajbhai Baladevji Thakor (Noticee 11), Pinesh Nareshkumar Shah (Noticee 13), Mahendrabhai Naranbhai Patel (Noticee 15), Bharti Sharma (Noticee 12), who are part of Group II. As buyer, Noticee 8 placed buy orders before sell order for 14 out of 67 buy trades and as seller, the sell order was placed before buy order for 53 out of 69 sell trades.

## 22. New High Price (NHP) Analysis of Group I entities:

22.1 Details of NHP analysis of trades carried out by entities belonging to Group I as buyers, with positive impact on LTP, during the patch is given below:

***Table 34***

| Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market Nhp | Contribution Among Group | Contribution To Nhp In Buy Order First Trades With Non-Group Entities |
|---|---|---|---|---|---|---|
| Pradeep Kumar Jain | 570 | 6 | 1.70 | 14.72% | 1.10 | 0.60 |
| Dharmendra Jain Huf | 200 | 2 | 0.90 | 7.79% | 0.90 | 0 |
| Anant Jain | 100 | 1 | 0.40 | 3.46% | 0.40 | 0 |
| Kavita Jain | 50 | 1 | 0.40 | 3.46% | 0.40 | 0 |
| Dharmendra Kumar Jain | 320 | 3 | 0.20 | 1.73% | 0.20 | 0 |
| Sandeep Kumar Jain | 180 | 1 | 0.10 | 0.87% | 0.10 | 0 |
| **Total** | **1420** | **14** | **3.70** | **32.03%** | **3.10** | **0.60** |
| **Market total** | **2741** | **47** | **11.55** | **100.00%** | **3.10** | **0.60** |

22.2 From the above table it was observed that, the Group I entities contributed Rs.3.70 to market NHP. This was 32.03% of market NHP. In trades with the group, group contributed Rs.3.10

to market NHP. In remaining trades with non-group entities in which they placed buy order first they contributed Rs.0.60 to NHP.

22.3 As regards to the contribution of Pradeep Kumar Jain (Noticee 2) to NHP, it was observed that there were 6 trades for 570 shares which contributed to Rs. 1.70 of NHP (i.e. 14.72% to the market NHP). There were 4 counterparties to the trades namely, Thar Commodities Pvt Ltd, Dharmendra Jain HUF (Noticee 4), Sandeep Kumar Jain and Kavita Jain, out of which the last 3 are part of Group I entities.

22.4 As regards to the contribution of Dharmendra Jain HUF (Noticee 4) to NHP, it was observed that there were 2 trades for 200 shares which contributed to Rs. 0.90 of NHP (i.e. 7.79% to the market NHP). There were two counterparties to the trades namely, Pradeep Kumar Jain (Noticee 2) and Dharmendra Kumar Jain (Noticee 3) who are part of Group I entities.

22.5 As regards to the contribution of Dharmendra Kumar Jain (Noticee 3) to NHP, it was observed that there were 3 trades for 320 shares which contributed to Rs. 0.20 of NHP (i.e. 1.73% to the market NHP). There was only one counterparty to the trades namely, Pradeep Kumar Jain (Noticee 2) who is part of the Group I entities.

## 23. NHP Analysis of Group II entities

23.1 Details of NHP analysis of trades carried out by entities of Group 2 as buyers, with positive impact on LTP, during the patch 2 is given below:

***Table 35***

| Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market Nhp | Contribution Among Group | Contribution To Nhp In Buy Order First Trades With Non Group Entities |
|---|---|---|---|---|---|---|
| Dhirajbhai Baladevji Thakor | 100 | 1 | 0.50 | 4.33% | 0.50 | 0 |
| Vinod Solanki | 200 | 2 | 0.35 | 3.03% | 0.35 | 0 |
| Ramanlal Ravchand Shah | 100 | 1 | 0.05 | 0.43% | 0.05 | 0 |
| **Total** | **400** | 4 | **0.90** | **7.79%** | **0.90** | **0.00** |
| **Market total** | **2741** | **47** | **11.55** | **100.00%** | **0.90** | **0.00** |

23.2 From the above table it was observed that, the group contributed Rs.0.90 to market NHP. This was 7.79% of market NHP. In trades with the group, group contributed Rs.0.90 to market NHP.

23.3 As regards to the contribution of Dhirajbhai Baladevji Thakor (Noticee 11) to NHP, it was observed that there was 1 trade for 100 shares which contributed to Rs. 0.50 of NHP (i.e.

4.33% to the market NHP). The counterparty was Bharti Sharma (Noticee 12), part of Group II entities.

23.4 As regards to the contribution of Vinod Solanki (Noticee 9) to NHP, it was observed that there were 2 trades for 200 shares which contributed to Rs. 0.35 of NHP (i.e. 3.03% to the market NHP). The counterparties were Ramanlal Ravchand Shah (Noticee 8) and Bharti Sharma (Noticee 12), part of Group II entities.

23.5 As regards to the contribution of Ramanlal Ravchand Shah (Noticee 8) to NHP, it was observed that there was 1 trade for 100 shares which contributed to Rs. 0.05 of NHP (i.e. 0.43% to the market NHP). The counterparty was Vinod Solanki (Noticee 9), part of Group II entities.

23.6 Analysis of trades of top 10 NHP contributors during the patch was also carried out and the observations are as under:

***Table 36***

| Pan no | Entity name | Qty | Number Of Trades | Contribution To Mkt Nhp | % Of Mkt Nhp |
|---|---|---|---|---|---|
| AMTPP6024G | Jayantibhai Tribhovandas Praja | 120 | 7 | 1.75 | 15.15% |
| ACAPJ1260F | Pradeep Kumar Jain | 570 | 6 | 1.70 | 14.72% |
| AAIPH6941H | Raj Kumari Hirawat | 130 | 8 | 1.30 | 11.26% |
| AACPW9267H | Lovely Williams | 100 | 4 | 1.25 | 10.82% |
| AAACC1519P | Centre For Monitoring Indian Economy Private Limit | 1 | 1 | 0.95 | 8.23% |
| AAGHD2552J | Dharmendra Jain Huf | 200 | 2 | 0.90 | 7.79% |
| AKMPM1201B | Lalit Kumar Malhotra | 120 | 3 | 0.70 | 6.06% |
| AACPW9268J | Joseph Williams | 20 | 2 | 0.65 | 5.63% |
| ATJPT1108Q | Dhirajbhai Baladevji Thakor | 100 | 1 | 0.50 | 4.33% |
| BAVPJ3631C | Anant Jain | 100 | 1 | 0.40 | 3.46% |
| **Total** | | **1461** | **35** | **10.10** | **87.45%** |
| **Market Total** | | **2741** | **47** | **11.55** | **100.00%** |

## 24. First Trade Analysis of Group I entities:

24.1 Details of the analysis of first trades carried out by the entities belonging to Group I as buyers, with positive impact on LTP, during this patch is as follows:

***Table 37***

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp | Number Of First Trades Among Group | Positive Ltp Contribution In First Trades Among Group |
|---|---|---|---|---|---|---|---|
| Pradeep Kumar Jain | 20 | 1855 | 6 | -1.70 | 1.85 | 18 | 1.80 |
| Dharmendra Kumar Jain | 14 | 1935 | 6 | -1.05 | 1.10 | 14 | 1.10 |
| Dharmendra Jain Huf | 2 | 300 | 0 | -0.65 | 0.00 | 2 | 0.00 |
| Kavita Jain | 1 | 50 | 0 | -0.45 | 0.00 | 1 | 0.00 |
| Anant Jain | 1 | 450 | 0 | -0.10 | 0.00 | 1 | 0.00 |
| **Total** | **38** | **4590** | **12** | **-3.95** | **2.95** | **36** | **2.90** |
| **Market total** | **64** | **6668** | **22** | **-8.25** | **5.95** | **36** | **2.90** |

24.2 From the above table, it was observed that, entities belonging to Group I were buyers in 38 first trades and contributed Rs.2.95 to market positive LTP. In 36 first trades the counterparty was a group entity. In first trades among themselves, the group contributed Rs.2.9 to positive LTP. In remaining 2 first trades with non-group entities, entities belonging to Group I contributed 0.05 to positive LTP. Of which in 2 first trades, entities belonging to Group I had placed buy order first and contributed Rs.0.05 to positive LTP.

24.3 As regards, the first trades of Pradeep Kumar Jain (Noticee 2), it was observed that there were 6 positive first trades which contributed to Rs. 1.85 of positive LTP. There were 5 counterparties, out of which 4 namely, Anant Jain, Dharmendra Jain HUF (Noticee 4), Kavita Jain and Dharmendra Kumar Jain (Noticee 3), who are part of Group I entities.

24.4 It was observed that among the first trades of Dharmendra Kumar Jain (Noticee 3), there were 6 positive first trades which contributed to Rs. 1.10 of positive LTP. The counterparty to all the 6 positive first trades was Pradeep Kumar Jain (Noticee 2), who is part of Group I entities.

24.5 As regards, the first trades of entities namely Dharmendra Jain HUF (Noticee 4), Kavita Jain and Anant Jain, it was observed that from Table 3 i.e., the connection among entities belonging to Group I, they have contributed Rs. 2.9 to market positive LTP through first trades amongst themselves.

## 25. First Trade Analysis of Group II

25.1 Since this was a price rise patch, analysis was carried out on the buy side. Details of the analysis of first trades carried out as buyers by the entities belonging to Group II, with positive impact on the LTP, during this patch is as follows:

*Table 38*

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp | Number Of First Trades Among Group | Positive Ltp Contribution In First Trades Among Group |
|---|---|---|---|---|---|---|---|
| Bhagavatiben Vishnubhai Patel | 11 | 948 | 4 | -1.10 | 0.65 | 11 | 0.65 |
| Dhirajbhai Baladevji Thakor | 2 | 150 | 1 | -0.25 | 0.20 | 2 | 0.20 |
| Vinod Solanki | 2 | 200 | 1 | 0.45 | 0.80 | 2 | 0.80 |
| Ramanlal Ravchand Shah | 2 | 220 | 1 | -0.90 | 0.20 | 2 | 0.20 |
| Babulal Hansraj Lakhani | 1 | 50 | 0 | -0.20 | 0.00 | 1 | 0.00 |
| **Total** | **18** | **1568** | 7 | **-2.00** | **1.85** | **18** | **1.85** |
| **Market total** | **64** | **6668** | 22 | **-8.25** | **5.95** | 18 | **1.85** |

25.2 From the above table, it was observed that, Group II entities were buyers in 18 first trades and contributed Rs.1.85 to market positive LTP. In 18 first trades the counterparty was a group entity. In first trades among themselves group contributed Rs.1.85 to positive LTP.

25.3 As regards, the first trades of Bhagavatiben Vishnubhai Patel (Noticee 10), it was observed that there were 4 positive first trades which contributed to Rs. 0.65 of positive LTP. There were 3 counterparties namely, Vinod Solanki (Noticee 9), Ramanlal Ravchand Shah (Noticee 8) and Bharti Sharma (Noticee 12), who are part of Group II entities.

25.4 As regards, the first trades of Dhirajbhai Baladevji Thakor (Noticee 11), it was observed that there was 1 positive first trade which contributed to Rs. 0.20 of positive LTP. There was 1 counterparty namely, Ramanlal Ravchand Shah (Noticee 8) who is part of Group II entities.

25.5 As regards, the first trades of Vinod Solanki (Noticee 9), it was observed that there was 1 positive first trade which contributed to Rs. 0.80 of positive LTP. There was 1 counterparty namely, Ramanlal Ravchand Shah (Noticee 8) who is part of Group II entities.

25.6 As regards, the first trades of Ramanlal Ravchand Shah (Noticee 8), it was observed that there was 1 positive first trade which contributed to Rs. 0.20 of positive LTP. There was 1 counterparty namely, Bharti Sharma (Noticee 12), who is part of Group II entities.

25.7 Analysis of trades of top 10 positive LTP contributors through first trades during the patch was also carried out and the observations are as under:

***Table 39***

| Pan no | Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp |
|---|---|---|---|---|---|---|
| ACAPJ1260F | Pradeep Kumar Jain | 20 | 1855 | 6 | -1.70 | 1.85 |
| ADBPJ4242K | Dharmendra Kumar Jain | 14 | 1935 | 6 | -1.05 | 1.10 |
| CYBPP2362R | Bhagavatiben Vishnubhai Patel | 11 | 948 | 4 | -1.10 | 0.65 |
| AAIPH6941H | Raj Kumari Hirawat | 3 | 35 | 1 | -1.45 | 0.10 |
| AACPW9268J | Joseph Williams | 2 | 15 | 1 | -0.15 | 0.70 |
| AAGHD2552J | Dharmendra Jain Huf | 2 | 300 | 0 | -0.65 | 0.00 |
| ATJPT1108Q | Dhirajbhai Baladevji Thakor | 2 | 150 | 1 | -0.25 | 0.20 |
| DMKPS4150Q | Vinod Solanki | 2 | 200 | 1 | 0.45 | 0.80 |
| GDWPS4583K | Ramanlal Ravchand Shah | 2 | 220 | 1 | -0.90 | 0.20 |
| AAECT3129N | Thar Commodities Pvt Ltd | 1 | 250 | 0 | -1.05 | 0.00 |
| **Total** | | **59** | **5908** | **21** | **-7.85** | **5.60** |
| **Market Total** | | 64 | 6668 | 22 | -8.25 | 5.95 |

## 26. Observations & Conclusions - Patch 2 (January 18, 2017 to April 25, 2017):

### A. Entities belonging to Group I:

26.1 It was observed that out of entities belonging to Group I, Dharmendra Jain HUF (Noticee 4) contributed 7.07% to net LTP an 7.79% to NHP. Anant Jain contributed 2.72% to net LTP and 3.46% to NHP. Kavita Jain, Sandeep Kumar Jain, Dharmendra Kumar Jain (Noticee 3) and Pradeep Kumar Jain (Noticee 2) negative contribution to net LTP.

26.2 It was also seen that entity Jaipur Infragold Private Limited (Noticee 5) was the top net seller with 3180 shares i.e. 4.03% contribution to market volume through net sell volume, out of

which the entities belonging to Group I were counterparties to 2230 shares (i.e. 70.13% of its shares).

26.3 In view of the foregoing observations and analysis, it is alleged that, Dharmendra Jain HUF (Noticee 4) and Jaipur Infragold Pvt Ltd (Noticee 5) manipulated the scrip price on BSE and thus indulged in an act which created false or misleading appearance of trading in the scrip thereby violating Section 12A(a), (b), (c) of SEBI Act, 1992 and Regulations 3 (a), (b), (c), (d) and 4 (1), 4 (2) (a) & (e) of SEBI (PFUTP) Regulations, 2003.

**B. Entities belonging to Group II:**

26.4 From LTP analysis, it was observed that 6 out of 11 entities of Group II namely, Bhagavatiben Vishnubhai Patel (Noticee 10), Vinod Solanki (Noticee 9), Bharti Sharma (Noticee 12), Babulal Hansraj Lakhani (Noticee 7), Dhirajbhai Baladevji Thakor (Noticee 11), Jasmin Indu Shah (Noticee 14) have contributed 23.91%, 21.74%, 13.04%, 13.04%, 9.24% and 5.98% respectively to net LTP. Vinod Solanki (Noticee 9) and Dhirajbhai Baladevji Thakor (Noticee 11) have also contributed 3.03% and 4.33% respectively to NHP. Hence, it has been alleged that, Bhagavatiben Vishnubhai Patel (Noticee 10), Vinod Solanki (Noticee 9), Bharti Sharma (Noticee 12), Babulal Hansraj Lakhani (Noticee 7), Dhirajbhai Baladevji Thakor (Noticee 11), Jasmin Indu Shah (Noticee 14) had significantly contributed to price rise in the scrip by way of trading within the group and created a misleading appearance of trading in the scrip and hence violated provisions of Section 12A(a), (b), (c) of SEBI Act, Regulations 3 (a), (b), (c), (d) and 4 (1), 4 (2) (a) & (e) of PFUTP Regulations.

**Patch 3 (April 26, 2017 to June 01, 2017):**

27. **LTP Analysis of Group I**

27.1 Details of the analysis of trades carried out by the entities belonging to Group I as buyers, with positive impact on LTP, during this patch is as follows:

*Table 40*

| Entity Name | All trades | | | LTP Diff > 0 | | | LTP Diff < 0 | | | LTP Diff = 0 | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Ltp Rate | Traded Qty | No. Of Trades | Ltp Rate | Traded Qty | No. Of Trades | Ltp Rate | Traded Qty | No. Of Trades | Traded Qty | No. Of Trades | |
| Dharmendra Kumar Jain | 3.75 | 1010 | 7 | 4.55 | 380 | 2 | -0.80 | 50 | 1 | 580 | 4 | 13.79% |
| Pradeep Kumar Jain | 2.40 | 861 | 17 | 7.85 | 130 | 5 | -5.45 | 41 | 5 | 690 | 7 | 23.79% |
| **Total** | **6.15** | **1871** | **24** | **12.40** | **510** | **7** | **-6.25** | **91** | **6** | **1270** | **11** | **37.58%** |
| **Market total** | **21.95** | **14571** | **144** | **33.00** | **5198** | **35** | **-11.05** | **670** | **13** | **8703** | **96** | **100.00%** |

27.2 It was observed that, during the price rise, two of the entities belonging to Group I, Dharmendra Kumar Jain (Noticee 3) and Pradeep Kumar Jain (Noticee 2) contributed Rs. 6.15 to net LTP and Rs.12.40 to the positive LTP which is 37.58% of market positive LTP as a group. Observations on analysis of trades by these two entities of Group I are given in following paragraphs.

27.3 It was observed that, trades carried out by Dharmendra Kumar Jain (Noticee 3), trading through Hindustan Tradecom Pvt Ltd., contributed Rs. 4.55 to positive LTP (i.e. 13.79% to market positive LTP) through 2 trades. The entity contributed Rs. 3.75 to net LTP (i.e. 17.08% to net LTP) through 7 trades.

27.4 On analysing the entire trades done by Noticee 3 during patch 3, it was observed that the entity purchased a total of 1010 shares in 7 trades and sold 750 shares as seller in 8 trades i.e. he had a balance of 260 shares. As a buyer, he purchased 870 out of 1010 shares through 4 trades from Pradeep Kumar Jain (Noticee 2), a suspected entity. Remaining 140 shares were purchased from two non-suspected entities namely, Arpit Tambi HUF and Thar Commodities Pvt Ltd through 3 trades. On analysis of buy trades, it is observed that Dharmendra Kumar Jain (Noticee 3) placed the buy orders before the sell orders for 6 out of 7 trades.

27.5 As seller, Noticee 3 sold 500 out of 750 through 7 trades shares to counterparty namely, Pradeep Kumar Jain (Noticee 2), a suspected entity. Remaining 250 shares were sold through 1 trade to Thar Commodities Pvt Ltd, a non-suspected entity. Net LTP as buyer for 7 trades was Rs. 3.75 and net LTP as seller for 8 trades was Rs. 2.5/- From transaction cum holding statement provided by CDSL vide email dated 23.09.2020, it was observed that Dharmendra Kumar Jain (Noticee 3) had no shareholding in the scrip of BFL-1 prior to these trades. In view of the foregoing, it is alleged that the trades done by Dharmendra Kumar Jain were not genuine trades but only sham trades.

27.6 Trades carried out by Pradeep Kumar Jain (Noticee 2) contributed Rs. 7.85 to positive LTP (i.e. 23.79% to market positive LTP) through 5 trades. He contributed Rs. 2.40 to net LTP (i.e. 10.93% to net LTP) through 17 trades.

27.7 On analysing the entire trades done by Pradeep Kumar Jain (Noticee 2) during patch 3, it was observed that the entity purchased a total of 861 shares in 17 trades and sold 1080 shares as seller in 18 trades i.e. he had a balance of 260 shares. As buyer, Noticee 2 bought 500 shares from Dharmendra Kumar Jain through 7 trades which contributed to LTP of

Rs.2.10. Remaining 361 shares were purchased from 4 non-suspected entities Thar Commodities Pvt Ltd, Saianad, Raj Kumari Hirawat and Waseem Ahmad through 10 trades. As seller, Noticee 2 sold 870 out of 1080 shares through 5 trades to counterparty namely, Dharmendra Kumar Jain (Noticee 3), a suspected entity. Remaining 210 shares were sold to 4 non-suspected entities namely, Purnachander Moogala, Johns Paul, Nirav Rajababu Gandhi and Thar Commodities Pvt Ltd through 13 trades. Net LTP as buyer for 17 trades was Rs. 2.40 and net LTP as seller for 18 trades was Rs. 4.80. From transaction cum holding statement provided by CDSL vide email dated 23.09.2020, it was observed that Pradeep Kumar Jain (Noticee 2) had no shareholding in the scrip of BFL-1 prior to the trades. In view of the foregoing, it is alleged that the trades done by Pradeep Kumar Jain (Noticee 2) were not genuine trades but only sham trades.

## 28. LTP Analysis of Group II

28.1 Details of the analysis of trades carried out by Group II entities as buyers, with positive impact on LTP, during this patch is as follows:

***Table 41***

| | All trades | | | Positive LTP trades | | | Negative LTP trades | | | Zero LTP trades | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Entity Name** | **Ltp Rate** | **Traded Qty** | **No. Of Trades** | **Ltp Rate** | **Traded Qty** | **No. Of Trades** | **Ltp Rate** | **Traded Qty** | **No. Of Trades** | **Traded Qty** | **No. Of Trades** | |
| Dhirajbhai Baladevji Thakor | 4.80 | 1150 | 11 | 4.80 | 225 | 2 | 0.00 | 0 | 0 | 925 | 9 | 14.55% |
| Ramanlal Ravchand Shah | 2.10 | 1600 | 12 | 2.10 | 674 | 4 | 0.00 | 0 | 0 | 926 | 8 | 6.36% |
| Pinesh Nareshkumar Shah | 1.00 | 2100 | 11 | 1.00 | 1000 | 3 | 0.00 | 0 | 0 | 1100 | 8 | 3.03% |
| Bhagavatiben Vishnubhai Patel | 0.50 | 1750 | 17 | 0.50 | 200 | 2 | 0.00 | 0 | 0 | 1550 | 15 | 1.52% |
| Vinod Solanki | 0.45 | 600 | 6 | 0.45 | 200 | 2 | 0.00 | 0 | 0 | 400 | 4 | 1.36% |
| Bharti Sharma | 0.20 | 1650 | 15 | 0.25 | 799 | 5 | -0.05 | 99 | 1 | 752 | 9 | 0.76% |
| Mahendrabhai Naranbhai Patel | -0.75 | 2400 | 27 | 0.55 | 350 | 2 | -1.30 | 450 | 4 | 1600 | 21 | 1.67% |
| **Total** | **8.30** | **11250** | **99** | **9.65** | **3448** | **20** | **-1.35** | **549** | **5** | **7253** | **74** | **29.24%** |
| **Market total** | **21.95** | **14571** | **144** | **33.00** | **5198** | **35** | **-11.05** | **670** | **13** | **8703** | **96** | **100.00%** |

28.2 It was observed that, Group II entities contributed Rs.8.30 to net LTP and Rs.9.65 to positive LTP in 20 positive LTP trades. Counterparties to their positive LTP trades were analysed and it was observed that in their 19 positive LTP trades of 2698 shares, the counterparties were group entities and through trades among themselves they contributed 26.52% to market positive LTP. In remaining 1 positive LTP trades with non-group entities, they contributed Rs.0.9 to positive LTP.

28.3 Further, the trading of these entities during patch 3 is as given below:

*Table 42*

| Entity name | Buy Traded Qty | %Buytq | Sell Traded Qty | %Selltq | Net Position |
|---|---|---|---|---|---|
| Mahendrabhai Naranbhai Patel | 2400 | 16.47% | 2400 | 16.47% | 0 |
| Pinesh Nareshkumar Shah | 2100 | 14.41% | 2100 | 14.41% | |
| Bhagavatiben Vishnubhai Patel | 1750 | 12.01% | 1750 | 12.01% | |
| Bharti Sharma | 1650 | 11.32% | 1650 | 11.32% | |
| Ramanlal Ravchand Shah | 1600 | 10.98% | 1600 | 10.98% | |
| Dhirajbhai Baladevji Thakor | 1150 | 7.89% | 1150 | 7.89% | |
| Vinod Solanki | 600 | 4.12% | 600 | 4.12% | |
| **Total** | **11250** | **77.21%** | **11250** | **77.21%** | |
| **Market total** | **14571** | **100.00%** | **14571** | **100.00%** | |

28.4 It was observed that Group II entities had contributed 77.21% to buy volume and 77.21% to sell volume and contributed 72.06% to market volume through trades among group.

28.5 It was observed that trades carried out by Dhirajbhai Baladevji Thakor (Noticee 11), trading through NNM Securities Pvt Limited, contributed Rs. 4.80 to positive LTP (i.e. 14.55% to market positive LTP) through 2 trades. The entity contributed Rs. 4.80 to net LTP (i.e. 21.87% to net LTP) through 11 trades.

28.6 On analysing the entire trades done by Dhirajbhai Baladevji Thakor (Noticee 11) during patch 3, it was observed that Noticee 11 purchased a total of 1150 shares in 11 trades and sold 1150 shares as seller in 11 trades i.e. the net position of entity was zero. As buyer, the counterparties to Dhirajbhai Baladevji Thakor were 5 entities namely, Ramanlal Ravchand Shah (Noticee 8), Mahendrabhai Naranbhai Patel (Noticee 15), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10), Pinesh Nareshkumar Shah (Noticee 13), who are part of Group II entities. As seller, the counterparties to Dhirajbhai Baladevji Thakor were 5 entities namely, Vinod Solanki (Noticee 9), Mahendrabhai Naranbhai Patel (Noticee 15), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10), Pinesh Nareshkumar Shah (Noticee 13), who are part of Group II entities. As buyer, Dhirajbhai Baladevji Thakor (Noticee 11) placed buy order before sell order for 2 out of 11 buy trades and as seller, the sell order was placed before buy order for 6 out of 11 sell trades.

28.7 It was observed that trades carried out by Ramanlal Ravchand Shah (Noticee 8), trading through R.K. Stock Holding Pvt Ltd, contributed Rs. 2.10 to positive LTP (i.e. 6.36% to market positive LTP) through 4 trades. Ramanlal Ravchand Shah (Noticee 8) contributed Rs. 2.10 to net LTP (i.e. 9.57% to net LTP) through 12 trades.

28.8 On analysing the entire trades done by Ramanlal Ravchand Shah (Noticee 8) during patch 3, it was observed that the entity purchased a total of 1600 shares in 12 trades and sold 1600 shares as seller in 12 trades i.e. the net position of entity was zero. As buyer, the

counterparties to Ramanlal Ravchand Shah (Noticee 8) were 3 entities namely, Bhagavatiben Vishnubhai Patel (Noticee 10), Mahendrabhai Naranbhai Patel (Noticee 15), Bharti Sharma (Noticee 12), who are part of Group II entities. As seller, the counterparties to Ramanlal Ravchand Shah (Noticee 8) were 4 entities namely, Bhagavatiben Vishnubhai Patel (Noticee 15), Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15), Bharti Sharma (Noticee 12), who are part of Group II entities. As buyer, Noticee 8 placed buy orders before sell order for 3 out of 12 buy trades and as seller, the sell order was placed before buy order for 10 out of 12 sell trades.

28.9 It was observed that trades carried out by Pinesh Nareshkumar Shah (Noticee 13), trading through Marfatia Stock Broking Pvt Limited, contributed Rs. 1 to positive LTP (i.e. 3.03% to market positive LTP) through 3 trades. Pinesh Nareshkumar Shah (Noticee 13) contributed Rs. 1 to net LTP (i.e. 4.56% to net LTP) through 11 trades.

28.10 On analysing the entire trades done by Pinesh Nareshkumar Shah (Noticee 13) during patch 3, it was observed that he purchased a total of 2100 shares in 11 trades and sold 2100 shares as seller in 13 trades i.e. the net position of entity was zero. As buyer, the counterparties to Pinesh Nareshkumar Shah (Noticee 13) were 5 entities namely, Mahendrabhai Naranbhai Patel (Noticee 15), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10), Nareshbhai Pappubhai Parmar, out of which Mahendrabhai Naranbhai Patel (Noticee 15), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10) are part of Group II. As seller, the counterparties to Pinesh Nareshkumar Shah (Noticee 13) were 5 entities namely, Mahendrabhai Naranbhai Patel (Noticee 15), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10), Nareshbhai Pappubhai Parmar, out of which Mahendrabhai Naranbhai Patel (Noticee 15), Dhirajbhai Baladevji Thakor (Noticee 11), Bharti Sharma (Noticee 12), Bhagavatiben Vishnubhai Patel (Noticee 10) are part of Group II entities. As buyer, he placed buy order before sell order for 3 out of 11 buy trades and as seller, the sell order was placed before buy order for 9 out of 13 sell trades.

28.11 It was observed that, trades carried out by Bhagavatiben Vishnubhai Patel (Noticee 10), trading through Swastika Investmart Limited, contributed Rs. 0.5 to positive LTP (i.e. 1.52% to market positive LTP) through 2 trades. The entity contributed Rs. 0.5 to net LTP (i.e. 23.91% to net LTP) through 17 trades.

28.12 On analysing the entire trades done by Bhagavatiben Vishnubhai Patel (Noticee 10) during patch 3, it is observed that the entity purchased a total of 1750 shares in 17 trades and sold 1750 shares as seller in 17 trades i.e. the net position of entity was zero. As buyer, the counterparties to Bhagavatiben Vishnubhai Patel (Noticee 10) were 4 entities namely, Mahendrabhai Naranbhai Patel (Noticee 15), Dhirajbhai Baladevji Thakor (noticee 11), Ramanlal Ravchand Shah (Noticee 8), Pinesh Nareshkumar Shah (Noticee 13), who are part of Group II. As seller, the counterparties to Bhagavatiben Vishnubhai Patel were 5 entities namely, Bharti Sharma, Mahendrabhai Naranbhai Patel, Dhirajbhai Baladevji Thakor, Ramanlal Ravchand Shah, Pinesh Nareshkumar Shah, who are part of Group II. As buyer, the entity placed buy order before sell order for 1 out of 17 buy trades and as seller, the sell order was placed before buy order for 7 out of 17 sell trades.

28.13 It was observed that, trades carried out by Vinod Solanki (Noticee 9), trading through Berkeley Securities Limited, contributed Rs. 0.45 to positive LTP (i.e. 1.36% to market positive LTP) through 2 trades. The entity contributed Rs. 0.45 to net LTP (i.e. 2.05% to net LTP) through 6 trades.

28.14 On analysing the entire trades done by Vinod Solanki (Noticee 9) during patch 3, it was observed that the entity purchased a total of 600 shares in 6 trades and sold 600 shares as seller in 7 trades i.e. the net position of entity was zero. As buyer, the counterparties to Vinod Solanki were 2 entities namely, Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15), who are part of Group II. As seller, the counterparty to Vinod Solanki was 1 entity namely, Mahendrabhai Naranbhai Patel, who is part of Group II. As buyer, the entity placed all buy orders after sell order for all 6 buy trades and as seller, the sell order was placed before buy order for 1 out of 7 sell trades.

28.15 It was observed that, trades carried out by Bharti Sharma (Noticee 12), trading through Tradebulls Securities Pvt Limited, contributed Rs. 0.25 to positive LTP (i.e. 0.76% to market positive LTP) through 5 trades. The entity contributed Rs. 0.20 to net LTP (i.e. 0.91% to net LTP) through 15 trades.

28.16 On analysing the entire trades done by Bharti Sharma (Noticee 12) during patch 3, it was observed that the entity purchased a total of 1650 shares in 15 trades and sold 1650 shares as seller in 14 trades i.e. the net position of entity was zero. As buyer, the counterparties to

Bharti Sharma were 5 entities namely, Dhirajbhai Baladevji Thakor (noticee 11), Bhagavatiben Vishnubhai Patel (Noticee 10), Pinesh Nareshkumar Shah (Noticee 13), Mahendrabhai Naranbhai Patel (Noticee 15), Ramanlal Ravchand Shah (Noticee 8), who are part of Group II. As seller, the counterparties to Bharti Sharma were 4 entities namely, Dhirajbhai Baladevji Thakor, Pinesh Nareshkumar Shah, Mahendrabhai Naranbhai Patel, Ramanlal Ravchand Shah, who are part of Group II. As buyer, the entity placed buy order before sell order for 1 out of 15 buy trades and as seller, the sell order was placed before buy order for 7 out of 14 sell trades.

28.17 It was observed that the trades carried out by Mahendrabhai Naranbhai Patel (Noticee 15), trading through Guiness Securities Limited, contributed Rs. 0.55 to positive LTP (i.e. 1.67% to positive LTP) through 2 trades. Mahendrabhai Naranbhai Patel (Noticee 15) contributed - Rs. 0.75 to net LTP (i.e. -3.42% to net LTP) through 27 trades.

28.18 On analysing the entire trades done by Mahendrabhai Naranbhai Patel (Noticee 15) during patch 3, it was observed that Mahendrabhai Naranbhai Patel (Noticee 15) purchased a total of 2400 shares in 27 trades and sold 2400 shares as seller in 25 trades i.e. the net position of entity was zero. As buyer, the counterparties to Mahendrabhai Naranbhai Patel were 6 entities namely, Vinod Solanki, Pinesh Nareshkumar Shah, Ramanlal Ravchand Shah, Bhagavatiben Vishnubhai Patel, Bharti Sharma, Dhirajbhai Baladevji Thakor, who are part of Group II entities. As seller, the counterparties to Mahendrabhai Naranbhai Patel were 6 entities namely, Dhirajbhai Baladevji Thakor (Noticee 11), Pinesh Nareshkumar Shah (Noticee 13), Ramanlal Ravchand Shah (Noticee 8), Bhagavatiben Vishnubhai Patel (Noticee 10), Bharti Sharma (Noticee 12), Vinod Solanki (Noticee 9), who are part of Group II entities. As buyer, he placed buy orders before sell order for 23 out of 27 buy trades and as seller, the sell order was placed before buy order for all 25 sell trades.

28.19 Analysis of trades of top 10 positive LTP contributors during the patch was also carried out and the observations are as under:

***Table 43***

| Entity name | All trades | | | LTP Diff > 0 | | | LTP Diff < 0 | | | LTP Diff=0 | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Ltp Rate | Traded Qty | No Trades | Ltp Rate | Traded Qty | No Trades | Ltp Rate | Traded Qty | No Trades | Traded Qty | No Trades | |
| Dhirajbhai Baladevji Thakor | 4.80 | 1150 | 11 | 4.80 | 225 | 2 | 0.00 | 0 | 0 | 925 | 9 | 14.55% |
| Dharmendra Kumar Jain | 3.75 | 1010 | 7 | 4.55 | 380 | 2 | -0.80 | 50 | 1 | 580 | 4 | 13.79% |
| Thar Commodities Pvt Ltd | 3.10 | 510 | 13 | 3.40 | 340 | 2 | -0.30 | 10 | 1 | 160 | 10 | 10.30% |
| Arpit Tambi Huf | 3.00 | 100 | 1 | 3.00 | 100 | 1 | 0.00 | 0 | 0 | 0 | 0 | 9.09% |
| Johns Paul | 2.45 | 40 | 2 | 2.45 | 20 | 1 | 0.00 | 0 | 0 | 20 | 1 | 7.42% |

| Entity name | All trades | | | LTP Diff > 0 | | | LTP Diff < 0 | | | LTP Diff=0 | | % Ltp |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Ltp Rate | Traded Qty | No Trades | Ltp Rate | Traded Qty | No Trades | Ltp Rate | Traded Qty | No Trades | Traded Qty | No Trades | |
| Pradeep Kumar Jain | 2.40 | 861 | 17 | 7.85 | 130 | 5 | -5.45 | 41 | 5 | 690 | 7 | 23.79% |
| Ramanlal Ravchand Shah | 2.10 | 1600 | 12 | 2.10 | 674 | 4 | 0.00 | 0 | 0 | 926 | 8 | 6.36% |
| Nirav Rajababu Gandhi | 1.85 | 20 | 2 | 1.85 | 20 | 2 | 0.00 | 0 | 0 | 0 | 0 | 5.61% |
| Pinesh Nareshkumar Shah | 1.00 | 2100 | 11 | 1.00 | 1000 | 3 | 0.00 | 0 | 0 | 1100 | 8 | 3.03% |
| Bhagavatiben Vishnubhai Patel | 0.50 | 1750 | 17 | 0.50 | 200 | 2 | 0.00 | 0 | 0 | 1550 | 15 | 1.52% |
| **Total** | **24.95** | **9141** | **93** | **31.50** | **3089** | **24** | **-6.55** | **101** | **7** | **5951** | **62** | **95.45%** |
| **Market Total** | **21.95** | **14571** | **144** | **33.00** | **5198** | **35** | **-11.05** | **670** | **13** | **8703** | **96** | **100.00%** |

28.20 During the price rise patch, top 10 entities contributed Rs. 24.95 to net LTP and Rs. 31.50 to positive LTP which is 95.45% to market positive LTP.

## 29. NHP Analysis of Group I entities:

29.1 Details of NHP analysis of trades carried out by Group I entities as buyers, with positive impact on LTP, during this patch is as follows:

*Table 44*

| Entity name | Quantity | Number of Trades | Contribution To Market Nhp | % Of Market Nhp | Contribution Among Group | Contribution To Nhp In Buy Order First Trades With Non-Group Entities |
|---|---|---|---|---|---|---|
| Dharmendra Kumar Jain | 380 | 2 | 4.40 | 18.72% | 1.40 | 0 |
| Pradeep Kumar Jain | 20 | 2 | 3.25 | 13.83% | 0.50 | 0 |
| **Total** | **400** | **4** | **7.65** | **32.55%** | **1.90** | **0.00** |
| **Market total** | **4539** | **26** | **23.50** | **100.00%** | **1.90** | **0.00** |

29.2 As regards the contribution of Dharmendra Kumar Jain (Noticee 3) to NHP, it was observed that there were 2 trades for 380 shares which he contributed to Rs. 4.40 of NHP (i.e. 18.72% to the market NHP). There were two counterparties to the trades namely, Arpit Tambi HUF and Pradeep Kumar Jain (Noticee 2) who is part of the Group I entities.

29.3 As regards the contribution of Pradeep Kumar Jain (Noticee 2) to NHP, it was observed that there were 2 trades for 20 shares which contributed to Rs. 3.25 of NHP (i.e. 13.83% to the market NHP). There were two counterparties to the trades namely, Raj Kumari Hirawat and Dharmendra Kumar Jain (Noticee 3) who is part of the Group I entities.

## 30. NHP Analysis of Group II entities:

30.1 Details of NHP analysis of trades carried out by entities of Group 2 entities as buyers, with positive impact on LTP during the patch 3 is given below:

*Table 45*

| Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market Nhp | Contribution Among Group | Contribution To Nhp In Buy Order First Trades With Non-Group Entities |
|---|---|---|---|---|---|---|
| Dhirajbhai Baladevji Thakor | 225 | 2 | 4.40 | 18.72% | 4.40 | 0 |
| Ramanlal Ravchand Shah | 674 | 4 | 1.90 | 8.09% | 1.90 | 0 |
| Pinesh Nareshkumar Shah | 750 | 1 | 0.90 | 3.83% | 0 | 0 |
| Mahendrabhai Naranbhai Patel | 350 | 2 | 0.55 | 2.34% | 0.55 | 0 |
| Bharti Sharma | 700 | 4 | 0.20 | 0.85% | 0.20 | 0 |
| Bhagavatiben Vishnubhai Patel | 200 | 2 | 0.10 | 0.43% | 0.10 | 0 |
| Vinod Solanki | 100 | 1 | 0.05 | 0.21% | 0.05 | 0 |
| **Total** | **2999** | **16** | **8.10** | **34.47%** | **7.20** | **0.00** |
| **Market total** | 4539 | 26 | 23.50 | 100.00% | 7.20 | 0.00 |

30.2 It was observed that the group contributed Rs.8.10 to market NHP which was 34.47% of market NHP. In trades with the group, Group II entities contributed Rs.7.20 to market NHP.

30.3 As regards the contribution of Dhirajbhai Baladevji Thakor (Noticee 11) to NHP, it was observed that there were 2 trades for 225 shares which contributed to Rs. 4.40 of NHP (i.e. 18.72% to the market NHP). The counterparties were Bharti Sharma (Noticee 12) and Ramanlal Ravchand Shah (Noticee 8), part of entities of Group II.

30.4 As regards the contribution of Ramanlal Ravchand Shah (Noticee 8) to NHP, it was observed that there were 4 trades for 674 shares which contributed to Rs. 1.90 of NHP (i.e. 8.09% to the market NHP). The counterparty was Bharti Sharma (Noticee 12), part of entities of Group II.

30.5 As regards the contribution of Pinesh Nareshkumar Shah (Noticee 13) to NHP, it was observed that there was 1 trade for 750 shares which contributed to Rs.0.20 of NHP (i.e. 0.85% to the market NHP).

30.6 As regards the contribution of Mahendrabhai Narenbhai Patel (Noticee 15) to NHP, it was observed that there were 2 trades for 350 shares which contributed to Rs.0.55 of NHP (i.e. 2.34% to the market NHP). The counterparties were Vinod Solanki (Noticee 9) and Ramanlal Ravchand Shah (Noticee 8), part of suspected entities of Group II.

30.7 As regards the contribution of Bharti Sharma (Noticee 12) to NHP, it was observed that there were 4 trades for 700 shares which contributed to Rs.0.20 of NHP (i.e. 0.85% to the market NHP). The counterparties were Dhirajbhai Baladevji Thakor (Noticee 11), Mahendrabhai Naranbhai Patel (Noticee 15) and Ramanlal Ravchand Shah (Noticee 8), part of suspected entities of Group II.

30.8 As regards the contribution of Bhagavatiben Vishnubhai Patel (Noticee 10) to NHP, it was observed that there were 2 trades for 200 shares which contributed to Rs. 0.10 of NHP (i.e.

0.43% to the market NHP). The counterparty was Mahendrabhai Naranbhai Patel (Noticee 15), part of suspected entities of Group II.

30.9 As regards the contribution of Vinod Solanki (Noticee 9) to NHP, it was observed that there was 1 trade for 100 shares which contributed to Rs.0.05 of NHP (i.e. 0.21% to the market NHP). The counterparty was Dhirajbhai Baladevji Thakor (Noticee 11), part of suspected entities of Group II.

30.10 Analysis of trades of top 10 NHP contributors during the patch was also carried out and the observations are as under:

***Table 46***

| Panno | Entity name | Quantity | Number Of Trades | Contribution To Market Nhp | % Of Market Nhp |
|---|---|---|---|---|---|
| ATJPT1108Q | Dhirajbhai Baladevji Thakor | 225 | 2 | 4.40 | 18.72% |
| ADBPJ4242K | Dharmendra Kumar Jain | 380 | 2 | 4.40 | 18.72% |
| ACAPJ1260F | Pradeep Kumar Jain | 20 | 2 | 3.25 | 13.83% |
| AAPHA7705R | Arpit Tambi Huf | 100 | 1 | 3.00 | 12.77% |
| AJLPJ2043E | Johns Paul | 20 | 1 | 2.45 | 10.43% |
| GDWPS4583K | Ramanlal Ravchand Shah | 674 | 4 | 1.90 | 8.09% |
| AAXPG0444M | Nirav Rajababu Gandhi | 20 | 2 | 1.85 | 7.87% |
| ANEPS6388L | Pinesh Nareshkumar Shah | 750 | 1 | 0.90 | 3.83% |
| DHGPP1260K | Mahendrabhai Naranbhai Patel | 350 | 2 | 0.55 | 2.34% |
| AAECT3129N | Thar Commodities Pvt Ltd | 250 | 1 | 0.40 | 1.70% |
| **Total** | | **2789** | **18** | **23.10** | **98.30%** |
| **Market Total** | | **4539** | **26** | **23.50** | **100.00%** |

## 31. First Trade analysis of Group I entities:

31.1 Details of the analysis of first trades carried out by the Group I entities during this patch is as follows:

***Table 47***

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp | Number Of First Trades Among Group | Positive Ltp Contribution In First Trades Among Group |
|---|---|---|---|---|---|---|---|
| Pradeep Kumar Jain | 4 | 40 | 2 | 1.50 | 4.55 | 1 | 1.80 |
| Dharmendra Kumar Jain | 2 | 380 | 2 | 4.55 | 4.55 | 1 | 1.40 |
| **Total** | **6** | **420** | **4** | **6.05** | **9.10** | **2** | **3.20** |
| **Market total** | **13** | **775** | **8** | **12.35** | **18.85** | **2** | **3.20** |

31.2 As regards the first trades of Pradeep Kumar Jain (Noticee 2), it was observed that there were 2 positive first trades which contributed to Rs. 1.80 of positive LTP. The counterparties to the trades were Raj Kumari Hirawat and Dharmendra Kumar Jain (Noticee 3).

31.3 As regards the first trades of Dharmendra Kumar Jain (Noticee 3), it was observed that there were 2 positive first trades which contributed to Rs. 1.40 of positive LTP. The counterparties to the trades were Arpit Thambi HUF and Pradeep Kumar Jain (Noticee 2).

## 32. First Trade Analysis of Group II

32.1 Details of the analysis of first trades carried out by Group II entities as buyers, with positive impact on LTP, during this patch is as follows:

*Table 48*

| Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp | Number Of First Trades Among Group | Positive Ltp Contribution In First Trades Among Group |
|---|---|---|---|---|---|---|---|
| Dhirajbhai Baladevji Thakor | 1 | 125 | 1 | 4.55 | 4.55 | 1 | 4.55 |
| Ramanlal Ravchand Shah | 1 | 99 | 1 | 0.75 | 0.75 | 1 | 0.75 |
| **Total** | 2 | 224 | 2 | **5.30** | 5.30 | 2 | 5.30 |
| **Market total** | 13 | 775 | 8 | **12.35** | 18.85 | 2 | 5.30 |

32.2 It was observed that, Group II entities were buyers in 2 first trades and contributed Rs.5.30 to market positive LTP. In 2 first trades the counterparty was a group entity. In first trades among themselves the group contributed Rs.5.3 to positive LTP.

32.3 As regards the first trades of Dhirajbhai Baladevji Thakor (Noticee 11), it was observed that there was 1 positive first trade which contributed to Rs. 4.55 of positive LTP. There was 1 counterparty namely, Bharti Sharma (Noticee 12) who is part of group of suspected entities of Group II.

32.4 As regards the first trades of Ramanlal Ravchand Shah (Noticee 8), it was observed that there was 1 positive first trade which contributed to Rs. 0.75 of positive LTP. There was 1 counterparty namely, Bharti Sharma (Noticee 12) who is part of group of suspected entities of Group II.

32.5 Analysis of trades of top 10 positive LTP contributors through first trades during the patch was also carried out and the observations are as under:

*Table 49*

| Pan no | Entity name | Total Number Of First Trades | Traded Quantity First Trades | Number Of First Trades At Positive Ltp | Net Ltp | Positive Ltp |
|---|---|---|---|---|---|---|
| ACAPJ1260F | Pradeep Kumar Jain | 4 | 40 | 2 | 1.50 | 4.55 |
| AAECT3129N | Thar Commodities Pvt Ltd | 3 | 101 | 1 | 2.70 | 3.00 |
| ADBPJ4242K | Dharmendra Kumar Jain | 2 | 380 | 2 | 4.55 | 4.55 |
| AAACO3452D | Oleander Manufacturers And Credit Ltd | 1 | 20 | 0 | -3.15 | 0.00 |
| AAXPG0444M | Nirav Rajababu Gandhi | 1 | 10 | 1 | 1.45 | 1.45 |
| ATJPT1108Q | Dhirajbhai Baladevji Thakor | 1 | 125 | 1 | 4.55 | 4.55 |
| GDWPS4583K | Ramanlal Ravchand Shah | 1 | 99 | 1 | 0.75 | 0.75 |
| **Total** | | **13** | **775** | 8 | **12.35** | **18.85** |
| **Market Total** | | **13** | **775** | 8 | **12.35** | **18.85** |

33. **Observations & Conclusions based on LTP Analysis, NHP Analysis, First Trade Analysis:**

**A. Group I entities:**

33.1 It was observed that 2 suspected entities, viz. Dharmendra Kumar Jain (Noticee 3) and Pradeep Kumar Jain (Noticee 2) contributed 13.79% and 23.79%, respectively, to market positive LTP. The entities contributed 17.08% and 10.93% respectively to net LTP.

33.2 Further, Pradeep Kumar Jain (Noticee 2) and Dharmendra Kumar Jain (Noticee 3) contributed 13.83% and 18.72% to the market NHP. Also, Pradeep Kumar Jain (Noticee 2) and Dharmendra Kumar Jain (Noticee 3) were involved in first trades contributing to Rs. 4.55 and Rs. 1.50 of positive LTP. It was also observed that the aforesaid two noticee 2 and 3 contributed 12.84% to buy volume and 12.56% to sell volume.

33.3 Connection of suspected Group I entities is already given in Table 3 above. Further, it was seen that the terminal user for the trades of Pradeep Kumar Jain (Noticee 2), trading through Tradeswift Broking Pvt. Ltd., was suspected entity, Nishant Jain (Noticee 1), who was also one of the promoters and directors of Tradeswift Broking Pvt. Ltd.

33.4 Therefore, in view of the aforesaid observations and analyses, it is alleged that the entities namely Dharmendra Kumar Jain (Noticee 3) and Pradeep Kumar Jain (Noticee 2) manipulated the scrip price on BSE and thus indulged in an act which created false or misleading appearance of trading in the scrip, thereby violating Section 12A(a), (b), (c) of SEBI Act and Regulations 3 (a), (b), (c), (d) and 4 (1), 4 (2) (a) & (e) of PFUTP Regulations.

**B. Group II of suspected entities:**

33.5 From the LTP analysis, it was observed that the entities of Group II namely, Dhirajbhai Baladevji Thakor (Noticee 11) and Ramanlal Ravchand Shah (Noticee 8) contributed 21.87% and 9.57% respectively to net LTP. The aforesaid entities contributed 18.72% and 8.09% respectively to NHP and in first trades, increased price by Rs. 4.55 and Rs. 0.75 respectively.

33.6 In view of the foregoing, it is alleged that Noticees 7 to 15, through their trades contributed significantly to the price variation in the scrip during the three patches and by executing such trades the aforesaid entities manipulated the price of scrip of BFL-I on BSE and thus

indulged in an act which created false or misleading appearance of trading in the scrip. Hence, it is alleged that, Noticees 7 to 15, had significantly contributed to price rise in the scrip by way of trading within the group and created a misleading appearance of trading in the scrip through manipulative trades among themselves, thereby violating provisions of Section 12A(a), (b), (c) of SEBI Act, Regulations 3 (a), (b), (c), (d) and 4 (1), 4 (2) (a) & (e) of PFUTP Regulations.

34. All the relevant provisions are reproduced as under:

- ***SEBI Act***

***"Prohibition of manipulative and deceptive devices, insider trading and substantial acquisition of securities or control.***

*12A. No person shall directly or indirectly –*

*(a) use or employ, in connection with the issue, purchase or sale of any securities listed or proposed to be listed on a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of this Act or the rules or the regulations made thereunder;*

*(b) employ any device, scheme or artifice to defraud in connection with issue or dealing in securities which are listed or proposed to be listed on a recognised stock exchange;*

*(c) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person, in connection with the issue, dealing in securities which are listed or proposed to be listed on a recognised stock exchange, in contravention of the provisions of this Act or the rules or the regulations made thereunder;"*

- ***PFUTP Regulations***

***"Regulation 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*

***"Regulation 4: Prohibition of manipulative, fraudulent and unfair trade practices***

*(e) Without prejudice to the provisions of regulation 3, no person shall indulge in a fraudulent or an unfair trade practice in securities.*

*(f) 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: —*

*(g) Knowingly indulging in an act which creates false or misleading appearance of trading in securities market.*

*(h) any act or omission amounting to manipulation of the price of a security*

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

36. The aforesaid allegations, if established, make Noticees liable for monetary penalty under Sections 15HA of SEBI Act: The text of the aforesaid provisions is given below:

- ***Section 15HA of SEBI Act: 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 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."*

37. In view of the above:

a. Noticees 1 to 15 are, therefore, called upon to show cause as to why an inquiry should not be held against them in terms of Rule 4 of SEBI Adjudication Rules read with section 15-I of SEBI Act, and penalty be not imposed under Section 15HA of SEBI Act for the

alleged violations of provisions of Sections 12A(a), (b), (c) of SEBI Act, Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a) and (e) of PFUTP Regulations by them.

b. Noticees 7 to 15, are therefore, called upon to show cause as to why an inquiry should not be held against them in terms of Rule 4 of SEBI Adjudication Rules read with section 15-I of SEBI Act, and penalty be not imposed under Section 15HA of SEBI Act for the alleged violations of provisions of Sections 12A(a), (b), (c) of SEBI Act, Regulations 3(a), (b), (c), (d), 4(1), 4(2)(a) & (g) of PFUTP Regulations by them.

38. Noticees reply, if any, should reach the undersigned, at Securities and Exchange Board of India, SEBI Bhavan, C4-A, 'G' Block,Bandra Kurla Complex, Bandra (East),Mumbai – 400 051, within 15( fifteen) days from the date of the receipt of this notice, and also through email to somam@sebi.gov.in and kedarh@sebi.gov.in, failing which it shall be presumed that they have no reply to submit and the matter would be further proceeded with on the basis of the evidence available on record in terms of Rule 4(7) of SEBI Adjudication Rules and Rule 4(7) of SCRA Adjudication Rules.

39. Noticees may also indicate in their reply if they desire a personal hearing in the matter. Noticees are advised to keep the undersigned informed about the change in its correspondence address, if any, and provide updated email-id and phone numbers, till the proceedings are complete. Noticees are also advised to submit photocopy of its identification documents for our records.

40. Noticees may also note that a settlement mechanism is provided under the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018. If they wish to avail the benefit of the settlement process, they may apply for the same in the manner provided in the said regulations, under intimation to the undersigned.

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***Encl:*** **One CD containing the following annexures: -**

| | |
|---|---|
| Annexure A | Communication of the order appointing AO |
| Annexure 1 | Connection chart depicting relationship among Group I entities |
| Annexure 2 | Trade Log and Order log for entire IP |
| Annexure 3 | Date-wise synchronized trades done by Noticees 1, 5 and 2 |
| Annexure 4 | KYC and UCC details of Group II entities |
| Annexure 5 | Date-wise synchronized trades done by Group II entities over 34 trading days |
| Annexure 6 | circular trades instances done by Group II entities |
| Annexure 7 | summary of reversal trades done by Group II entities |
| Annexure 8 | transaction cum holding statement obtained from CDSL vide email dated 23.09.2020 |
| Annexure 9 | email from BSE dated 16.10.2020 and 23.02.2021 |
| Annexure 10 | Director's report for FY 2015-16 and FY 2016-17 from MCA Website |
| Annexure 11 | list of shareholders from MCA Website |
| Annexure 12 | email dated 08.06.2020 from Tradeswift Broking Private Ltd |
| Annexure 13 | email dated 23.09.2020 from CDSL regarding off market transfer |
| Annexure 14 | Copy of KYC of Noticee 4 |
| Annexure 15 | Copy of KYC of Noticee 3 |
| Annexure 16 | Copy of KYC of Noticee 2 |