भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

Speed Post Acknowledgement Due/ E-mail

EAD – 9/ADJ/SCN/VKV/AKS/2025/2022
January 17, 2022

Shreyansh Educational Trust,
524, Nehru Nagar East,
Bhilai - 490 020 (Chhattisgarh)
E-mail: powerbhilai@yahoo.com

Notice under Rule 4(1) of Securities and Exchange Board of India (Procedure for Holding Inquiry and imposing Penalties by Adjudicating Officer) Rules, 1995 in the matter of trading in Illiquid Stock Options of BSE

1. Securities and Exchange Board of India (hereinafter referred to as '**SEBI**'), vide *communiqué* dated July 27, 2021 (**Annexure-1**), appointed undersigned as Adjudicating Officer (hereinafter referred to as **'AO'**) under Section 19 read with Section 15-I(1) of Securities and Exchange Board of India Act, 1992 (hereinafter referred to as '**SEBI Act**') read with Rule 3 of SEBI (Procedure for Holding Inquiry and imposing Penalties) Rules, 1995 to inquire into and adjudge under the provisions of Sections 15HA of the SEBI Act, for the violation of the relevant provisions of SEBI (Prohibition of Fraudulent and Unfair Trade Practices related to Securities Market) Regulations, 2003 (hereinafter referred to as '**PFUTP Regulations**'), alleged to have been violated by Shreyansh Educational Trust (hereinafter referred to as '**Noticee**') for carrying out non-genuine trades in illiquid stock options at Bombay Stock Exchange (**BSE**).

2. SEBI observed large scale reversal of trades in Stock Options segment of BSE leading to creation of artificial volume. Pursuant to this, SEBI conducted an investigation into the trading activities of certain entities in illiquid Stock Options at BSE for the period April 01, 2014 to September 30, 2015 (hereinafter referred to as '**investigation period/relevant period'**).

3. It may be noted that reversal trades are considered non genuine trades if it involves an entity reversing its buy or sell positions in a contract with subsequent sell or buy positions with the same counterparty during the same day. In this regard, artificial volume is considered as the volume (no. of units) reversed in non-genuine trades, comprising both original volume and reversed volume while keeping out the volume which is not reversed.

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बांद्रा-कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर.एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in
SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.
Tel.: 2644 9950 / 4045 9950 (IVRS), 2644 9000 / 4045 9000 Fax : 2644 9019 to 2644 9022 Web : www.sebi.gov.in

4. Pursuant to the investigation, it is alleged that, during the investigation period, a total of 2,91,643 trades comprising substantial 81.40% of all the trades executed in Stock Options Segment of BSE were non genuine trades. The aforesaid alleged non genuine trades resulted into creation of artificial volume to the tune of 826.21 crore units or 54.68% of the total market volume in Stock Options segment of BSE during the Investigation period.

5. It is further noted that said alleged non genuine trades were not restricted to any specific contract or between any specific set of entities. It is noted that the Noticee was one of the various entities which were indulged in execution of such alleged non genuine trades in Stock Options Segment of BSE during the investigation period. Subsequent paras provide an insight with the dealings of the Noticee during the Investigation period and allegations against him for execution of non-genuine trades.

6. For the sake of clarity on non-genuine trades and artificial volume, a contract *viz*, "YESB15APR900.00CE" in which the Noticee has traded during the investigation period, is shown below covering all trades that are executed by the Noticee in the said contract during Investigation period:

Table 1 - Trades of the Noticee in the contract of "YESB15APR900.00CE"

Sl.	Date	Buyer	Seller	Buy Order Time	Sell Order Time	Trade Time	Trade Rate (Rs.)	Trade Quantity
1	24/03/15	Ms. Sonali Gupta	Shreyansh Educational Trust	10:12:35	10:12:35	10:12:35	1.50	70,000
2	24/03/15	Shreyansh Educational Trust	Ms. Sonali Gupta	10:12:39	10:12:39	10:12:39	11.50	70,000
		Total						**1,40,000**

a. It is observed from the trade log that the Noticee had executed total 2 trades during investigation period in the contract "YESB15APR900.00CE" and both trades taken place on same day i.e. March 24, 2015.

b. It is further observed that the Noticee, at 10:12:35 hrs placed a sell order for 70,000 units of call option of contract "YESB15APR900.00CE" at a price of Rs. 1.50 and 70,000 units of this sell order of the Noticee got matched with the buy order of another entity namely, Ms. Sonali Gupta, which herself had placed a buy order for 70,000 units at 14:53:00 hrs in the same contract and at 10:12:35 hrs, just few milliseconds before the sell order placed by the Noticee in the said contract.

c. Thereafter, the Noticee, at 10:12:39 hrs placed a buy order for 70,000 units of call option of contract "YESB15APR900.00CE" at a price of Rs. 11.50. This buy order of the Noticee got matched with the sell order of Ms. Sonali Gupta, which herself had placed a sell order for 70,000 units in the same contract at 10:12:39 hrs i.e. few milliseconds before the buy order placed by the Noticee. Thus the sell order placed by the Noticee at Rs. 1.50 was reversed with the same counterparty at Rs. 11.50, within 5 seconds in the same contract.

d. From the above, it has been seen that total no. of non-genuine trades that were executed in contract "YESB15APR900.00CE" by the Noticee were 2 (as listed in table 1 above), and total artificial volume generated through such non genuine trades was 1,40,000 units.

7. It is further observed from the trade log of the Noticee that it had traded in 2 unique contracts in the Stock Options segment of BSE during the relevant period, in which it has allegedly entered into non genuine trades in all contracts wherein it executed a total of 4 trades all of which were allegedly non genuine trades. In view of this, it is alleged that the abovementioned trades of the Noticee had resulted into creation of artificial volume of total 2,40,000 units in the given 2 contracts. It is further alleged that the Noticee, by executing non genuine trades during the relevant period, registered a negative close out difference of Rs. 8,00,000. In this regard, details of all the alleged non-genuine trades of the Noticee in Stock Option Segment of BSE during relevant period are attached as **Annexure 2**.

8. Further, Summary of dealings of the Noticee in 2 Stock Options contracts in which it had allegedly executed non genuine trades during the relevant period is as follows:

Table 2 – Summary of dealings of Noticee in contracts wherein he executed non genuine trades (**Annexure 3**)

S. No.	Contract Name	Avg. Buy Rate (Rs.)	Total Buy Volume (no. of units)	Avg. Sell Rate (Rs.)	Total Sell Volume (no. of units)	% of Non Genuine trades of Noticee in the contract to Noticee's Total trades in the Contract	% of Non Genuine trades of Noticee in the contract to Total trades in the Contract	% of Artificial Volume generated by Noticee in the contract to Noticee's Total Volume in the Contract	% of Artificial Volume generated by Noticee in the contract to Total Volume in the Contract
1	RCAP15APR440.00CEW4	11.00	50000	9.00	50000	100%	20%	100%	18.94%
2	YESB15APR900.00CE	11.50	70000	1.50	70000	100%	100%	100%	100%

9. From the above table, it may be observed regarding the dealings of the Noticee:

a) The Noticee has allegedly executed non genuine trades in 2 contracts, wherein, all the trades that had been executed by the Noticee in these contracts were allegedly non genuine trades.

b) Number of trades of the Noticee, which are alleged to be non-genuine, have contributed significantly when compared with the total number of trades from the market in the above contracts. The alleged non genuine trades of the Noticee ranged from 20% to 100% of the total trades that had taken place in the aforementioned contracts.

c) The whole volume of 2,40,000 units generated by the Noticee in the said contracts due to its alleged non genuine trades was artificial volume, and further this alleged artificial volume, generated by the Noticee, also contributed significantly to the extent of 18.94% to 100% of the total volume in said contracts in the market.

d) These alleged non genuine trades, executed by the Noticee in said contracts, had significant differential in buy rates and sell rates considering that the trades were reversed within few seconds on same day. The Noticee has allegedly engaged in the non-genuine transactions in the option segment of BSE for the purpose of creating false appearance of trading.

10. In view of the foregoing, it is alleged that the Noticee, by indulging in execution of reversal trades in Stock Options with same entities on the same day, which were non-genuine in nature, has created false or misleading appearance of trading in the aforementioned contracts traded in the option segment of BSE. In view of the fact that these options contracts were illiquid in nature, having very small volume in trading, the Noticee allegedly created artificial volumes in stock options which was manipulative and deceptive in nature. Therefore, in view of above, it is alleged that the Noticee has violated Regulation 3(a), (b), (c), (d), 4(1) and 4(2)(a) of PFUTP Regulations. The text of aforementioned provisions of law is being reproduced below:

PFUTP Regulations, 2003

3. Prohibition of certain dealings in securities

No person shall directly or indirectly—

(a) buy, sell or otherwise deal in securities in a fraudulent manner;

(b) use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under;

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

(d) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under.

4. Prohibition of manipulative, fraudulent and unfair trade practices

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

(2) Dealing in securities shall be deemed to be a fraudulent or an unfair trade practice if it involves fraud and may include all or any of the following, namely:—

(a) indulging in an act which creates false or misleading appearance of trading in the securities market;

11. The alleged violation of the aforementioned provisions of the PFUTP Regulations, if proved, makes the Noticee liable for penalty under the provisions of Section 15HA of the SEBI Act. The text of the said provisions is reproduced below:

SEBI Act, 1992

Penalty for fraudulent and unfair trade practices.

15HA. *If any person indulges in fraudulent and unfair trade practices relating to securities, he shall be liable to a penalty of twenty-five crore rupees or three times the amount of profits made out of such practices, whichever is higher.*

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

13. Your reply (***a word copy also***), along with supporting enclosures and documents, should reach the undersigned at the address mentioned below as well as through email at vijayantkv@sebi.gov.in and aruns@sebi.gov.in within 14 days from the date of receipt of this Notice, failing which it shall be presumed that you have no submissions to make, in which case, the matter shall be proceeded with on the basis of material/facts on record. You may also indicate in your reply if you desire a personal hearing in the matter.

14. You are also required to submit a copy of your PAN Card and your contact details (contact person, phone number, email details, fax etc.) for our records. Further, in case there is any change in your address or contact details during the period of the current Adjudication Proceedings, the same may be brought to the notice of the Adjudicating Officer immediately.

V.K. Verma

Vijayant Kumar Verma
Adjudicating Officer

Enclosures: As per the below list.

List of Annexures – Relied upon documents in instant proceedings

Particular	Annexure
Copy of Communication Order dated July 27, 2021.	1
Details of all the alleged non-genuine trades of Noticee in Stock Option Segment of BSE during relevant period.	2
Summary of dealings of the Noticee in contracts wherein he executed non genuine trades.	3

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Annexure I

SECURITIES AND EXCHANGE BOARD OF INDIA

Communication of the Order appointing Adjudicating Officer

1. Whereas, Securities and Exchange Board of India (SEBI) has examined trading in the scrip of Illiquid Stock Options at BSE for possible violation of the provisions of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as the '**SEBI Act**') and various rules and regulations made there under.

2. Whereas, the Competent Authority is *prima facie* of the view that there are grounds to adjudicate upon the alleged violations of Regulations 3 (a), (b), (c), (d), and Regulations 4 (1), 4 (2) (a) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003, by the entities mentioned at **Annexure A.**

3. The Competent Authority has, therefore, in exercise of the powers conferred upon her under Section 19 of the SEBI Act, 1992 ("SEBI Act") read with Section 15-I(1) of the SEBI Act and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 ("hereinafter referred as the 'SEBI Rules') read with Section 19 of the SEBI Act appointed **Shri Suresh B. Menon, Chief General Manager, Shri G. Ramar, Chief General Manager, Ms. Maninder Cheema, Chief General Manager, Shri Prasanta Mahapatra, Chief General Manager, Shri Vijayant Kumar Verma, General Manager and Ms. Soma Majumder, General Manager** as Adjudicating Officers vide Order dated June 21, 2021 to enquire into and adjudge under Sections 15HA SEBI Act, 1992 for alleged violations by the Noticees as mentioned at Para 2 above. The list of the entities against whom adjudication is approved and the names of the Adjudicating Officers who are appointed to adjudicate against respective entities are listed in Annexure A.

4. The said proceedings of appointment are hereby communicated to **the Adjudicating Officers** who shall conduct the Adjudication Proceedings in the manner specified under Rule 4 of the of the SEBI Rules read with sub-section (1) and (2) of Section 15 I of SEBI Act. The Adjudicating Officers shall enquire into and adjudicate upon the alleged violation as stated above and if the Adjudicating Officers are satisfied that the entities have become liable to penalty, may impose penalty, as they think fit, in terms of Rule 5 of the SEBI Rules and provisions of Sections 15 HA of the SEBI Act.

Dated at Mumbai, this 27th day of **July 2021.**

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

Annexure 2 Shreyansh Edu Trust AAGTS8352M				
sno	121211	121212	137288	137294
TRADE_DATE	24/03/2015	24/03/2015	30/03/2015	30/03/2015
SCRIPCODE	843516	843516	832743	832743
clnt_pan	AAGTS8352M	AJQPG3914Q	AABCK1559L	AAGTS8352M
clnt_name	SHREYANSH EDUCATIONAL TRUST	SONALI GUPTA	KALAWATI INVESTMENTS AND TRADING PVT LTD	SHREYANSH EDUCATIONAL TRUST
cp_pan	AJQPG3914Q	AAGTS8352M	AAGTS8352M	AABCK1559L
cp_name	SONALI GUPTA	SHREYANSH EDUCATIONAL TRUST	SHREYANSH EDUCATIONAL TRUST	KALAWATI INVESTMENTS AND TRADING PVT LTD
ORDER_NO	1427171733704006003	1427171733704006000	1427693705819002012	1427693705819002015
CP_ORDER_NO	1427171733704006002	1427171733704006001	1427693705819002013	1427693705819002014
TRADEID	4459	5888	6865	7817
ORDER_TIME	10:12:39.142849	10:12:35.143614	12:27:03.912539	12:27:06.852778
CP_ORDER_TIME	10:12:39.043873	10:12:35.242606	12:27:03.952509	12:27:06.810784
TRADE_TIME	10:12:39.142849	10:12:35.242606	12:27:03.952509	12:27:06.852778
ORDER_LMTIME	10:12:39.142849	10:12:35.143614	12:27:03.912539	12:27:06.852778
CP_ORDER_LMTIME	10:12:39.043873	10:12:35.242606	12:27:03.952509	12:27:06.810784
TRADE_RATE	11.5	1.5	9	11
LTP_RATE	-37988.5	-10.0	-2.5	1.5
LTP_PERCENT	-99.97	-86.96	-21.74	15.79
TRADE_VALUE	63805000.0	63105000.0	22450000.0	22550000.0
ORDER_RATE	11.5	1.5	9.0	11.0
CP_ORDER_RATE	11.5	1.5	9.0	11.0
ORDER_LMRATE	11.5	1.5	9.0	11.0
CP_ORDER_LMRATE	11.5	1.5	9.0	11.0
ORDER_LTP	11.5	38000.0	11.5	11.0
CP_ORDER_LTP	1.5	1.5	9.0	9.0
TRADED_QTY	70000	70000	50000	50000
ORDER_QTY	70000	70000	50000	50000
CP_ORDER_QTY	70000	70000	50000	50000
ORDER_AVLQTY	70000	70000	50000	50000
CP_ORDER_AVLQTY	70000	70000	50000	50000
ORDER_LMQTY	70000	70000	50000	50000
CP_ORDER_LMQTY	70000	70000	50000	50000
MEMBER_NO	4036	6551	4034	4036
MEMBER_NAME	GEOMETRY VANIJYA PVT. LTD.	GIRIRAJ STOCK BROKING PVT. LTD.	BAHUBALI FOREX PVT LTD	GEOMETRY VANIJYA PVT. LTD.
OLD_CLIENT				
MODIFIED_CLIENT	GVP697	S522	BF915	GVP697
CP_MEMBER_NO	6551	4036	4036	4034
CP_MEMBER_NAME	GIRIRAJ STOCK BROKING PVT. LTD.	GEOMETRY VANIJYA PVT. LTD.	GEOMETRY VANIJYA PVT. LTD.	BAHUBALI FOREX PVT LTD
CP_OLD_CLIENT				
CP_MODIFIED_CLIENT	S522	GVP697	GVP697	BF915
TERMINALID	902	902	902	902
USER_NAME	GOVIND GOENKA	Vinay Jajodia		GOVIND GOENKA
LOCATION_ADDRESS	11, CLIVE ROW KOLKATA WEST BENGAL 700001	190, JAMUNA LAL BAJAJ STREET KOLKATA WEST BENGAL 700007		11, CLIVE ROW KOLKATA WEST BENGAL 700001
CP_TEMINALID	902	902	902	902
CP_USER_NAME	Vinay Jajodia	GOVIND GOENKA	GOVIND GOENKA	
CP_LOCATION_ADDRESS	190, JAMUNA LAL BAJAJ STREET KOLKATA WEST BENGAL 700007	11, CLIVE ROW KOLKATA WEST BENGAL 700001	11, CLIVE ROW KOLKATA WEST BENGAL 700001	
ORDER_AUD	A	A	A	A
CP_ORDER_AUD	A	A	A	A
ORDER_TYPE	L	L	L	L
CP_ORDER_TYPE	L	L	L	L
LOCATIONID	7000010001001012	7000070001001012	7000070001003012	7000010001001012
CP_LOCATIONID	7000070001001012	7000010001001012	7000010001001012	7000070001003012
SCRIPNAME	YESB15APR900.00CE	YESB15APR900.00CE	RCAP15APR440.00CEW4	RCAP15APR440.00CEW4
EXPIRY	2015-04-30	2015-04-30	2015-04-23	2015-04-23
STRIKEPRICE	90000.0	90000.0	44000.0	44000.0
SERIES	EQD	EQD	EQD	EQD
MKT_TYPE	N	N	N	N
ISIN_NO				
rqty	70000	70000	50000	50000

Annexure 3 Shreyansh Edu Trust AAGTS8352M																
scripname	buy_quantity	buy_value	avg_buy_rate	sell_qty	sell_value	avg_sell_rate	non_gen_trnx_entity_contrct	total_trd_entity_contrct	total_no_of_trades_of_the_cntrct	art_vol_gen_entity_in_the_cntrct	total_vol_gen_by_entity_in_the_cntrct	total_vol_in_the_contract	prcnt_of_non_gen_trds_entity_total_trds_in_cntrct_entity	prcnt_of_non_gen_trds_entity_total_trds_in_cntrct	prcnt_of_art_vol_gen_entity_cntrct_total_vol_gen_by_entity_in_cntrct	prcnt_of_art_vol_gen_entity_cntrct_total_vol_in_cntrct
RCAP15APR440.00CEW4	50000	550000	11	50000	450000	9	2	2	10	100000	100000	528000	100	20	100	18.94
YESB15APR900.00CE	70000	805000	11.5	70000	105000	1.5	2	2	2	140000	140000	140000	100	100	100	100