By Speed Post Acknowledgment Due

Adjudicating Officer

EAD-8/JS/VRP/OW/13757/2018
May 08, 2018

SR. NO.	NAME, PAN NO. AND ADDRESS OF THE ENTITIES	SR. NO.	NAME, PAN NO. AND ADDRESS OF THE ENTITIES
1	M/S.MAXTOR CONCLAVE PVT LTD (AAICM5727H) MMS CHAMBER FIRST FLOOR 4 A COUNCIL HOUSE STREET KOLKATA, 700001	13	M/S.DHANAASHA DEVELOPERS PVT. LTD. (AAECD6470G) C/O DHANAASHA DEVELOPERS PVT LTD 6 LYONS RANGE M17 KOLKATA 700001
2	M/S.BLUEVIEW TRADEVIN PVT. LTD. (AAECB8239K) 12A NETAJI SUBHASH ROAD FIFTH FLOOR ROOM NO19, 700001	14	M/S.PANCHMADHU PROJECTS PVT. LTD. (AAHCP0443J) HOUSE NO 9 A DR G S BASU ROAD GROUND FLOOR KOLKATA 700039
3	M/S.JAIN NEMI MINERALS PVT. LTD. (AACCJ4323L) A-5, KANUNGO CLASSIC APARTMENT M.D. NAGAR, CHANDRESH LODHA MARG, NALLOSAPARA E THANE THANE MH 401209 IN.	15	M/S.NIRDESH TRADING PVT. LTD. (AABCN1526E) 23A N S ROAD KOLKATA WEST BENGAL 700001
4	M/S.KESHAVAH MERCANTILE PVT. LTD. (AAECK7235N) 30 BENTICK STREET 3RD FLOOR ROOM NO 305 KOLKATA KOLKATA 700001	16	M/S.DHANASETH PROPERTIES PVT. LTD. (AAECD6471H) HOUSE NO M22 6 LYONS ROAD KOLKATA KOLKATA 700001
5	M/S.FROHAR TRADING PVT. LTD. (AACCF0551A) L 7 A 001 PRATIKSHA NAGAR NEW MAHADA COLONY, 400022	17	M/S.PRAGYAN REALTY PVT. LTD. (AAHCP1157B) 16 INDIAN EXCHANGE PLACE 1ST FLOOR ROOM NO 26 KOLKATA 700001
6	M/S.QUICKSCOPE DEALERS PVT. LTD. (AANCS8376B) 16 INDIAN EXCHANGE PLACE 1ST FLOOR KOLKATA KOLKATA 700001	18	M/S.HARI MOHAN BERIWALA AND OTHERS HUF (AAAHH9893J) CD45 SECTOR1 SALT LAKE CITY, KOLKATA, 700064
7	M/S.AMBUJA COMMOSALES PVT. LTD. (AAICA1638F) BALAJI TOWER 132 COTTON STREET 4TH FLOOR, 700007	19	MS.MANJU BERIWALA (ADDPB1460H) 4 DEBENDRA LAL KHAN ROAD BLOCK -C , FLAT NO. 201 2ND FLOOR KOLKATA - 700025
8	M/S.ANIL KUMAR AGARWALA HUF (AAEHA4449K) 302 SURYA APTT DR SK BHUYAN RDDIGHALI PUKHURI EAST, GUWAHATI, ASSAM, INDIA, 781001	20	MS.SAURABH KUMAR AGRAWAL HUF (AAUHS5431F) 21 LALABAJARA JHARIA P O JHARIA DIST DHANBAD DHANBAD JHARKHAND – 828111
9	M/S.ECSTATIC MERCHANDISE PVT. LTD. (AABCO4034C) 16 INDIA EXCHANGE PLACE 1ST FLOOR ROOM NO 26 KOLKATA 700001	21	M/S.SARDA SOLUTIONS PVT. LTD. (AATCS2316K) T-1, 3RD FLOOR, HOUSE NO 99, SHIVAM APARTMENTS A K AZAD ROAD, REHBARI GUWAHATI KAMRUP, ASSAM 781008

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

10	MR.HARI MOHAN BERIWALA (ADXPB6833G) CD45 SECTOR1 SALT LAKE CITY, KOLKATA, 700064	22	M/S.PROFICIENT MANAGERIAL SOLUTIONS PVT. LTD. (AAHCP1962C) T-1, 3RD FLOOR, HOUSE NO 99, SHIVAM APARTMENTS A K AZAD ROAD, REHBARI GUWAHATI KAMRUP, ASSAM 781008
11	MS.SANTOSH DEVI AGARWAL (ADAPA1940Q) CA-54 SECTOR-I, SALT LAKE KOLKATA W.B. 700064	23	MS.SARWANI DEVI MODI (ADUPM9995M) THE MILLENNIUM, 235/2A, A.J.C. BOSE ROAD, 5TH FLOOR, KOLKATA - 700020
12	MS.SAPNA AGARWALA (AEOPA6422Q) 4 MOTILAL BASAK LANE PHOOLBAGAN KOLKATA - 700054		

Notice under Rule 4 (1) of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995.

1 Adjudicating Officer was appointed on March 16, 2018 under section 15I of Securities and Exchange Board of India Act, 1992 (**SEBI Act, 1992**) and under Rule 3 of Securities and Exchange Board of India (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 (**Adjudication Rules**) to inquire into and adjudge under section 15HA of Act, 1992 the alleged violations of Reg.3(a),(b),(c),(d),4(1), 4(2)(a) and (e) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations, 2003 (PFUTP Regulations, 2003) by 1) M/s. Maxtor Conclave Pvt Ltd, 2) M/s.Blueview Tradevin Pvt. Ltd, 3) M/s.Jain Nemi Minerals Pvt. Ltd., 4)M/s.Keshavah Mercantile Pvt. Ltd, 5) M/s.Frohar Trading Pvt. Ltd., 6)M/s.Quickscope Dealers Pvt.Limited, 7) M/s.Ambuja Commosales Pvt. Ltd, 8) M/s. Anil Kumar Agarwala HUF, 9) M/s.Ecstatic Merchandise Pvt. Ltd., 10) Mr.Hari Mohan Beriwala, 11) Ms.Santosh Devi Agarwal, 12) Ms. Sapna Agarwala, 13) M/s. Dhanaasha Developers Pvt. Ltd., 14) M/s. Panchmadhu Projects Pvt., Ltd, 15) M/s. Nirdesh Trading Pvt., Ltd, 16) M/s. Dhanaseth Properties Pvt Ltd, 17) M/s. Pragyan Realty Pvt. Ltd., 18) M/s.Hari Mohan Beriwala and others HUF, 19) Ms.Manju Beriwala, 20) Ms. Saurabh Kumar Agrawal, 21) M/s.Sarda Solutions Pvt. Ltd., 22) M/s. Proficient Managerial Solutions Pvt. Ltd and 23) Ms.Sarwani Devi Modi (**Collectively Noticees**) in the scrip of Sunstar Realty Development Limited (**The Company**) during the period of November 26, 2013 to June 03, 2015 (**Investigation period/ IP**). The copy of the communique dated March 28, 2018 is enclosed as **Annexure–A.**

2. The company is listed on Bombay Stock Exchange Limited (**BSE**). During the investigation period, the price of the scrip opened at Rs. 51.20 on November 26, 2013, reached a high of Rs. 425.95 on December 10, 2014 and closed at Rs. 401.20 on June 03, 2015. Based on the price movement, three patches of price rise, one patch of price fall and one patch of stable price movement was observed during the investigation period.

3. The price-volume details during the investigation period is as under:

Table 3: Price Volume details during investigation period - BSE (Price in Rs.)

Patches	Period	Designation	Open	High	Low	Close	Avg. Traded Volume
Pre-IP	26/08/2013 to 25/11/2013	No trades were observed during this period					
IP - Patch-1	26/11/2013 to 30/04/2014	Price	51.20	210.75 (10/04/2014))	51.20 (26/11/2013)	185.95	69184
		Volume	3000	216000 (24/03/2014)	3000 (multiple dates)	103000	
IP - Patch-2	01/05/2014 to 22/10/2014	Price	189.90	218.00 (06/06/2014)	165.05 (08/05/2014)	206.95	67599
		Volume	73900	185400 (02/06/2014)	600 (20/10/2014)	9600	
IP - Patch-3	23/10/2014 to 15/12/2014	Price	229.90	425.95 (10/12/2014)	229.90 (multiple dates)	424.90	20598
		Volume	600	600 (23/10/2014)	41950 (29/10/2014)	28800	
IP - Patch-4	16/12/2014 to 31/12/2014	Price	424.90	424.90 (15/12/2014)	240.00 (31/12/2014)	240.00	48573
		Volume	41400	88700 (18/12/2014)	24000 (30/12/2014)	30000	
IP – Patch -5	01/01/2015 to 03/06/2015	Price	252.00	419.90 (multiple dates)	251.95 (01/01/2015)	401.2	44894
		Volume	31200	111600 (26/03/2015)	600 (05/03/2015)	12900	
		There was shares split in the ratio 10:1 effective June 04, 2015					
Post - IP	04/06/2015 to 03/09/2015	Price	40.50	41.50 (10/06/2015)	25.20 (14/08/2015)	34.00	339606
		Volume	6000	6000 (04/06/2015)	663000 (07/08/2015)	174000	

4. It is observed that there were certain entities connected to each other. The details of these entities and their connections are as below:

Sl. No.	PAN	Entity Name	Source of Connection
1	AADCB8132G	Bholebaba Suppliers Private Limited	Transferred funds to Sunstar Realty Development Ltd. Common Director – Rabindranath Verma (DIN – 06579597) with Ecstatic Merchandise Pvt. Ltd (sl. no. 2) Common Director Abhishek Modi (DIN – 06590792) with Quickscope Dealers Pvt. Ltd (sl. no. 4), Wondrous Marketing Pvt. Ltd. (sl. no. 5) , Aryanraj Properties Pvt. Ltd. (sl. no. 3) and Shivsakti Exports Pvt. Ltd. (sl. no. 26)

2	AABCO4034C	Ecstatic Merchandise Private Limited	Common Director – Rabindranath Verma (DIN – 06579597) with Bholebaba Suppliers Pvt. Ltd. (sl. no. 1) Common address – 16, Indian Exchange Place, 1st floor, Kolkata – 700001 with Sonnet Mercantile Pvt. Ltd (sl. no.) and Maxtor Conclave Pvt. Ltd. (sl. no. 13) Common email id – privatecos26@gmail.com with Wondrous Marketing Pvt. Ltd (sl. no. 5), Sonnet Mercantile Pvt. Ltd (sl. no. 6) , Tremendous Commodeal Pvt. Ltd. (sl. no. 7) , and Shivsakti Exports Pvt. Ltd. (sl. no. 26)
3	AALCA5298E	Aryanraj Properties Private Limited	Common Director – Abhishek Modi (DIN – 06590792) with Bholebaba Suppliers Pvt. Ltd. (sl. no. 1), Quickscope Dealers Pvt. Ltd (sl. no. 4), Wondrous Marketing Pvt. Ltd. (sl. no. 5) , and Shivsakti Exports Pvt. Ltd. (sl. no. 26) Common Director – Gopa Banerjee (DIN – 06599733) and Gopal Chandra Saha (DIN – 06576695) with Quickscope Dealers Pvt. Ltd (sl. no. 4) and Wondrous Marketing Pvt. Ltd. (sl. no. 5) Common Director – Gopa Banerjee (DIN – 06599733) with Dhanaseth Properties Pvt. Ltd (sl. no.)
4	AANCS8376B	Quickscope Dealers Private Limited	Common Director – Abhishek Modi (DIN – 06590792) with Bholebaba Suppliers Pvt. Ltd. (sl. no. 1), Aryanraj Properties Pvt. Ltd. (sl. no. 3), Wondrous Marketing Pvt. Ltd. (sl. no. 5) , and Shivsakti Exports Pvt. Ltd. (sl. no. 26) Common Director – Gopa Banerjee (DIN – 06599733) and Gopal Chandra Saha (DIN – 06576695) with Wondrous Marketing Pvt. Ltd (sl. no. 5) and Aryanraj Properties Pvt. Ltd (sl. no. 3) Common Director – Gopa Banerjee (DIN – 06599733) with Dhanaseth Properties Pvt. Ltd (sl. no.)
5	AACCJ4617K	Wondrous Marketing Private Limited	Common Director – Abhishek Modi (DIN – 06590792) with Bholebaba Suppliers Pvt. Ltd. (sl. no. 1), Aryanraj Properties Pvt. Ltd. (sl. no. 3), Quickscope Dealers Pvt. Ltd. (sl. no. 4) , and Shivsakti Exports Pvt. Ltd. (sl. no. 26) Common Director – Gopa Banerjee (DIN – 06599733) and Gopal Chandra Saha (DIN – 06576695) with Quickscope Dealers Pvt. Ltd (sl. no. 4) and Aryanraj Properties Pvt. Ltd (sl. no. 3) Common email id – privatecos26@gmail.com with Sonnet Mercantile Pvt. Ltd (sl. no. 6) , Ecstatic Traders Pvt. Ltd. (sl. no. 2) and Tremendous Commodeal Pvt. Ltd. (sl. no. 7) Common Phone No. – 8820982870 with Sarda Solutions Pvt. Ltd. (sl. no. 21) Common Director – Gopa Banerjee (DIN – 06599733) with Dhanaseth Properties Pvt. Ltd (sl. no.)
6	AAOCS9332C	Sonnet Mercantile Private Limited	Common email id – privatecos26@gmail.com with Wondrous Marketing Pvt. Ltd (sl. no.5), Ecstatic Traders Pvt. Ltd. (sl. no. 2) , Shivsakti Exports Pvt. Ltd. (sl. no. 26) and Tremendous Commodeal Pvt. Ltd. (sl. no. 7) Common Director – Sutapa Mukherjee (DIN – 06654561) with Tremendous Commodeal Pvt. Ltd. (sl. no. 7) and Optimistic Mercantile Pvt. Ltd (sl. no. 8) Common Director – Gourab Ray Chaudhuri (DIN – 06610580) with Panchmadhu Projects Pvt. Ltd. (sl. no. 9)

			Common address – 16, Indian Exchange Place, 1st floor, Kolkata – 700001 with Maxtor Conclave Pvt. Ltd. (sl. no. 13) and Ecstatic Traders Pvt. Ltd (sl. no. 2)
7	AAJCA0881H	Tremendous Commodeal Private Limited	Common Director – Sutapa Mukherjee (DIN – 06654561) with Sonnet Mercantile Pvt. Ltd. (sl. no. 6) and Optimistic Mercantile Pvt. Ltd (sl. no. 8) Common email id – privatecos26@gmail.com with Wondrous Marketing Pvt. Ltd (sl. no. 5), Sonnet Mercantile Pvt. Ltd (sl. no. 6) , Ecstatic Traders Pvt. Ltd. (sl. no. 2) , Shivsakti Exports Pvt. Ltd. (sl. no. 26) Common Director – Kartick Chandra Varma (DIN – 06586061) with Pragyan Realty Pvt. Ltd. (sl. no.)
8	AABCO3684Q	Optimistic Mercantile Private Limited	Common Director – Sutapa Mukherjee (DIN – 06654561) with Tremendous Commodeal Pvt. Ltd. (sl. no. 7) and Sonnet Mercantile Pvt. Ltd (sl. no. 6) Common Director – Naresh Kumar Jain (DIN – 02552776) and Prabir Bhattacharay (DIN – 01995730) with Champion Vanijya Pvt. Ltd. (sl. no. 19) Common Director – Prabir Bhattacharyay (DIN – 01995730) with Signature Dealtrade Pvt. Ltd (sl. no. 20)
9	AAHCP0443J	Panchmadhu Projects Private Limited	Common Director – Gourab Ray Chaudhuri (DIN – 06610580) with Sonnet Mercantile Pvt. Ltd. (sl. no. 6) Common Director – Krishnendu Ghosh (DIN – 06632267) with Speedfast Residency Pvt. Ltd. (sl. no. 10) and Keshavah Mercantile Pvt. Ltd. (sl. no. 11)
10	AATCS1180P	Speedfast Residency Private Limited	Common Director – Krishnendu Ghosh (DIN – 06632267) with Panchmadhu Projects Pvt. Ltd. (sl. no. 9) and Keshavah Mercantile Pvt. Ltd. (sl. no. 11)
11	AAECK7235N	Keshavah Mercantile Private Limited	Common Director – Krishnendu Ghosh (DIN – 06632267) with Speedfast Residency Pvt. Ltd. (sl. no. 10) and Panchmadhu Projects Pvt. Ltd. (sl. no. 9) Common address – 14/c, Jaihind Co-CHS Gulab Nagar Khar Danda Khar-west Mumbai-52 and common email id – companyprivate45@gmail.com with Keshavah Dealtrade Pvt. Ltd. (sl. no. 12)
12	AAECK7236R	Keshavah Dealtrade Private Limited	Common address – 14/c, Jaihind Co-CHS Gulab Nagar Khar Danda Khar-west Mumbai-52 and common email id – companyprivate45@gmail.com with Keshavah Mercantile Pvt. Ltd. (sl. no. 11)
13	AAICM5727H	Maxtor Conclave Private Limited	Common address – 16, Indian Exchange Place, 1st floor, Kolkata – 700001 with Sonnet Mercantile Pvt. Ltd. (sl. no. 6) and Ecstatic Traders Pvt. Ltd (sl. no. 2) Common email id – companypvt13@gmail.com with Saktimata Marketing Pvt. Ltd. (sl. no. 14) Common Director – Arunava Banerjee (DIN – 06576758) with Shivsakti Exports Pvt. Ltd. (sl. no. 26) , Dhanaasha Developers Pvt. Ltd. (sl. no.) and Pragyan Realty Pvt. Ltd. (sl. no.)
14	AARCS1549Q	Saktimata Marketing Private Limited	Common email id – companypvt13@gmail.com with Maxtor Conclave Pvt. Ltd. (sl. no. 13) Received funds from Nirdesh Trading Pvt. Ltd. (sl. no. 16) Common Director – Dinesh Mishra (DIN – 02353844) with Ambuja Commosales Pvt. Ltd. (sl. no. 15)

15	AAICA1638F	Ambuja Commosales Private Limited	Common Director – Dinesh Mishra (DIN – 02353844) with Saktimata Marketing Pvt. Ltd. (sl. no. 14)
16	AABCN1526E	Nirdesh Trading Private Limited	Transferred funds to Saktimata Marketing Pvt. Ltd. (sl. no. 14), Gainsay Property Pvt. Ltd. (sl. no. 17) and Blueview Tradevin Pvt. Ltd. (sl. no. 18)
17	AAFCG2185A	Gainsay Property Private Limited	Received funds from Nirdesh Trading Pvt. Ltd. (sl. no. 16)
18	AAECB8239K	Blueview Tradevin Private Limited	Received funds from Nirdesh Trading Pvt. Ltd. (sl. no. 16)
19	AAECC1679C	Champion Vanijya Private Limited	Common Director – Naresh Kumar Jain (DIN – 02552776) and Prabir Bhattacharay (DIN – 01995730) with Optimistic Mercantile Pvt. Ltd. (sl. no. 8) Common Director – Prabir Bhattacharyay (DIN – 01995730) with Signature Dealtrade Pvt. Ltd (sl. no. 20)
20	AAOCS9059G	Signature Dealtrade Private Limited	Common Director – Sanjib Karmakar (DIN – 06750462) with Dhanaasha Developers Pvt. Ltd. (sl. no.) and Keshavah Dealtrade Private Limited (sl. no. 12) Common Director – Prabir Bhattacharyay (DIN – 01995730) with Champion Vanijya Pvt. Ltd (sl. no. 19) and Optimistic Mercantile Pvt. Ltd.(sl. no. 8)
21	AATCS2316K	Sarda Solutions Private Limited	Common Phone No. – 8820982870 with Wondrous Marketing Pvt. Ltd. (sl. no. 5) Common address T-1, 3rd floor, House no 99, Shivam Apartments A K Azad Road, Rehbari Guwahati Kamrup, Assam – 781008 with Malakar and Das Broking Services Private Limited (sl. no. 22) and Proficient Managerial Solutions Private Limited (sl. no. 23)
22	AAICM6326L	Malakar and Das Broking Services Private Limited	Common address T-1, 3rd floor, House no 99, Shivam Apartments A K Azad Road, Rehbari Guwahati Kamrup, Assam – 781008 with Sarda Solutions Private Limited (sl. no. 21) and Proficient Managerial Solutions Private Limited (sl. no. 23) Common Director – Ajay Malakar (DIN – 06574842) with Proficient Managerial Solutions Pvt. Ltd. (sl. no. 23)
23	AAHCP1962C	Proficient Managerial Solutions Private Limited	Common address T-1, 3rd floor, House no 99, Shivam Apartments A K Azad Road, Rehbari Guwahati Kamrup, Assam – 781008 with Sarda Solutions Pvt. Ltd. (sl. no. 21) and Malakar and Das Broking Services Private Limited (sl. no. 22) Common Director – Ajay Malakar (DIN – 06574842) with Malakar and Das Broking Services Private Limited (sl. no. 22)
24	AACCF0551A	Frohar Trading Private Limited	Transferred and received funds from Sunstar Realty Development Ltd. Transferred funds to Jain Nemi Minerals Pvt. Ltd. (sl. no. 25) and Shivsakti Exports Pvt. Ltd. (sl. no. 26) Transferred shares in off-market to Massive Management Consultancy Private Limited (sl. no. 27)

25	AACCJ4323L	Jain Nemi Minerals Private Limited	Received funds from Frohar Trading Pvt. Ltd. (sl. no. 24)
26	AAQCS8252B	Shivsakti Exports Private Limited	Common email id – privatecos26@gmail.com with Wondrous Marketing Pvt. Ltd (sl. no. 5) , Ecstatic Traders Pvt. Ltd. (sl. no. 2) , Sonnet Mercantile Pvt. Ltd. (sl. no. 6) and Tremendous Commodeal Pvt. Ltd. (sl. no. 7) Received funds from Frohar Trading Pvt. Ltd. (sl. no. 24) Common Director – Arunava Banerjee (DIN – 06576758) with Dhanaasha Developers Pvt. Ltd. (SL. no.) , Maxtor Conclave Pvt. Ltd. (sl. no. 13) and Pragyan Realty Pvt. Ltd. (sl. no.) Common Director – Abhishek Modi (DIN – 06590792) with Bholebaba Suppliers Pvt. Ltd. (sl. no. 1), Quickscope Dealers Pvt. Ltd (sl. no. 4), Wondrous Marketing Pvt. Ltd. (sl. no. 5) , Aryanraj Properties Pvt. Ltd. (sl. no. 3)
27	AAGCM8405J	Massive Management Consultancy Private Limited	Off-market transfer with Frohar Trading (sl. no. 24), Sunita Devi Modi (sl. no. 28), Sarwani Devi Modi (sl. no. 29), Adrika Modi (sl. no. 30), Kiran Lata Modi (sl. no. 31), Gayatri Devi Modi (sl. no. 32), Nikita Modi (sl. no. 33), Santosh Devi Agarwal (sl. no. 34), Zamal Ahmed (sl. no. 35), Anil Kumar Agarwala HUF (sl. no. 36), Sapna Agarwala (sl. no. 37), Hari Mohan Beriwala (sl. no. 38), Hari Mohan Beriwala & Others HUF (sl. no. 42), Manju Beriwala (sl. no. 43) and Saurabh Kumar Agrawal (sl. no. 44)
28	ADYPM7156J	Sunita Devi Modi	Off-market transfer with Massive Management Consultancy (sl. no. 27)
29	ADUPM9995M	Sarwani Devi Modi	Off-market transfer with Massive Management Consultancy (sl. no. 27)
30	AHCPM2305D	Adrika Modi	Off-market transfer with Massive Management Consultancy (sl. no. 27)
31	AELPM0120J	Kiran Lata Modi	Off-market transfer with Massive Management Consultancy (sl. no. 27)
32	ADTPM7410Q	Gayatri Devi Modi	Off-market transfer with Massive Management Consultancy (sl. no. 27)
33	AOWPM8225M	Nikita Modi	Off-market transfer with Massive Management Consultancy (sl. no. 27)
34	ADAPA1940Q	Santosh Devi Agarwal	Off-market transfer with Massive Management Consultancy (sl. no. 27)
35	ACTPA6241Q	Zamal Ahmed	Off-market transfer with Massive Management Consultancy (sl. no. 27)
36	AAEHA4449K	Anil Kumar Agarwala HUF	Off-market transfer with Massive Management Consultancy (sl. no. 27)
37	AEOPA6422Q	Sapna Agarwala	Off-market transfer with Massive Management Consultancy (sl. no. 27)
38	ADXPB6833G	Hari Mohan Beriwala	Off-market transfer with Massive Management Consultancy (sl. no. 27)
39	AAECD6470G	Dhanaasha Developers Private Limited	Transferred and received from Sunstar Realty Development Ltd. Common Director – Arunava Banerjee (DIN – 06576758) with Shivsakti Exports Pvt. Ltd. (sl. no. 26) , Maxtor

			Conclave Pvt. Ltd. (sl. no. 13) and Pragyan Realty Pvt. Ltd. (sl. no.)
40	AAHCP1157B	Pragyan Realty Private Limited	Received funds from Sunstar Realty Development Ltd. Common Director – Kartick Chandra Varma (DIN – 06586081) with Tremendous Commodeal Pvt. Ltd. (sl. no. 7) Common Director – Arunava Banerjee (DIN – 06576758) with Shivsakti Exports Pvt. Ltd. (sl. no. 26) , Dhanaasha Developers Pvt. Ltd. (sl. no.) and Maxtor Conclave Pvt. Ltd. (sl. no. 13)
41	AAECD6471H	Dhanaseth Properties Private Limited	Common Director – Abinash Rudra (DIN – 06576749) with Maxtor Conclave Pvt. Ltd. (sl. no. 13) Common Director – Gopa Banerjee (DIN – 06599733) with Quickscope Dealers Pvt. Ltd. (sl. no. 4), Wondrous Marketing Pvt. Ltd. (sl. no. 5), and Aryanraj Properties Pvt. Ltd. (sl. no. 3)
42	AAAHH9893J	Hari Mohan Beriwala And Others Huf	Off-market transfer with Massive Management Consultancy (sl. no. 27)
43	ADDPB1460H	Manju Beriwala	Off-market transfer with Massive Management Consultancy (sl. no. 27)
44	AAUHS5431F	Saurabh Kumar Agrawal	Off-market transfer with Massive Management Consultancy (sl. no. 27)

The copies of KYC, UCC data received from BSE, details on MCA website, bank account statements, off-market transactions indicating the basis of connections are placed as **Annexures-1, 2, 3, 4** and **5** respectively in Compact Disk (CD)

5. **Price rise during December 16, to December 31, 2014**

5.1. During December 16, to December 31, 2014, the price of the scrip opened at Rs. 229.9, reached a high of Rs. 425.95 and closed at Rs. 424.9 i.e., a rise of 84.82% from the opening price.

5.2. It is observed that 21 Group entities out of 44 the Group entities appeared as buyers during December 16, to December 31, 2014. The buy trades of these 21 Group entities is given as under:

Sl. No.	Entity	All trades			LTP >0			LTP < 0			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	No of trades	Qty	
1	Malakar Das Broking Services Private Limited	77.65	11	20400	88.85	5	12000	-11.2	2	3000	4	5400	21.99
2	Maxtor Conclave Private Limited	29.8	18	32400	35.95	2	3000	-6.15	3	7800	13	21600	8.90
3	Frohar Trading Private Limited	24.95	4	8600	24.95	2	4200	-	-	-	2	2400	6.18
4	Blueview Tradevin Private Limited	24.85	11	10800	24.85	4	5400	-	-	-	7	5400	6.15
5	Pragyan Realty Private Limited	14.2	15	32400	15.4	2	3600	-1.2	2	6000	11	22800	3.81

Sl. No.	Entity	All trades			LTP >0			LTP < 0			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	No of trades	Qty	
6	Proficient Managerial Solutions Private Limited	11.05	10	16200	11.05	2	6600	-	-	-	8	9600	2.74
7	Jain Nemi Minerals Private Limited	11	5	9000	11	2	5400	-	-	-	3	3600	2.72
8	Keshavah Mercantile Private Limited	6.25	5	9600	6.25	2	6000	-	-	-	3	3600	1.55
9	Signature Dealtrade Private Limited	4.2	29	76200	8.8	5	12600	-4.6	5	10800	19	52800	2.18
10	Tremendous Commodeal Private Limited	0.15	16	30600	0.15	3	9600	-	-	-	13	21000	0.04
11	Quickscope Dealers Private Limited	0.05	9	14400	0.95	2	1200	-0.9	1	1800	6	11400	0.24
12	Speedfast Residency Private Limited	0.05	6	12000	0.05	1	3000	-	-	-	5	9000	0.01
13	Ambuja Commosales Private Limited	0.05	3	7200	0.05	1	2400	-	-	-	2	4800	0.01
14	Dhanaseth Properties Private Limited	0	4	4800	-	-	-	-	-	-	4	4800	0.00
15	Panchmadhu Projects Private Limited	0	8	21600	-	-	-	-	-	-	8	21600	0.00
16	Shivsakti Exports Pvt Ltd	-0.05	8	12000	-	-	-	-0.05	1	3000	7	9000	0.00
17	Dhanaasha Developers Private Limited	-0.05	2	4800	-	-	-	-0.05	1	3600	1	1200	0.00
18	Sarda Solutions Private Limited	-0.5	1	1200	-	-	-	-0.5	1	1200	-	-	0.00
19	Nirdesh Trading Private Limited	-1.95	6	13200	0.1	2	6000	-2.05	4	7200	-	-	0.02
20	Saktimata Marketing Private Limited	-3.1	17	16800	0.95	2	1800	-4.05	6	5400	9	9600	0.24
21	Ecstatic Merchandise Private Limited	-3.95	7	21000	0.05	1	4200	-4	3	11400	3	5400	0.01
Group Total		194.65	195	373200	229.4	38	87000	-34.75	29	61200	128	225000	56.78
Market Total		217.95	424	679750	404.00	85	155400	-186.05	65	110950	274	413400	100.00

5.3. It is observed from the table above that, 21 Group entities contributed Rs. 229.40 to +ve LTP (56.78% of market +ve LTP). Six group entities listed at sl. no. 1 to 6 in the table above, appeared in the list of top 10 entities that contributed +ve net LTP as buyers during December 16, to December 31, 2014.

5.4. It is further observed that, 13 group entities (sl. no. 1 to 13 of table above) had +ve net LTP, six group entities (sl. no. 16 to 21 of table above) had –ve net LTP contribution and two group entities (sl. no. 14 and 15 of table above) did not contribute to market +ve/-ve LTP.

5.5. The net LTP contribution of the group entities at sl. no. 1 to 13 was Rs. 204.25 while the market net LTP was Rs. 217.95. Hence the +ve LTP trades of the group entities at sl. no. 1 to 13 have contributed significantly to market net LTP.



5.6. Further, from the trades of the Group entities that contributed to +ve net LTP it was observed that the Group entities had traded amongst themselves, the details of which are given as under:

Sellers → / Buyers ↓	+ve LTP (No. of trades)						Total +ve LTP (% of market +ve LTP)
	Anil Kumar Agarwala HUF	Ecstatic Merchandise Pvt. Ltd.	Hari Mohan Beriwala	Jain Nemi Minerals Pvt. Ltd.	Santosh Devi Agarwal	Sapna Agarwala	
Maxtor Conclave Pvt. Ltd.	-	22.95 (1)	-	-	-	-	22.95 (5.68)
Blueview Tradevin Pvt. Ltd.	-	-	21.90(1)	-	-	0.90 (1)	22.80 (5.64)
Jain Nemi Minerals Pvt. Ltd.	-	-	-	-	-	10.90 (1)	10.90 (2.70)
Keshavah Mercantile Pvt. Ltd.	-	-	-	0.95 (1)	5.30 (1)	-	6.25 (1.55)
Frohar Trading Pvt. Ltd.	-	-	0.05 (1)	-	-	-	0.05 (0.01)
Quickscope Dealers Pvt. Ltd.	0.05 (1)	-	-	-	-	-	0.05 (0.01)
Ambuja Commosales Pvt. Ltd.	-	-	-	-	0.05 (1)	-	0.05 (0.01)
						Total	63.05 (15.61)

5.7. It is observed from the table above, 13 group entities, by trading amongst themselves, contributed Rs. 63.05 to market +ve LTP in 9 trades which is 15.61% of market +ve LTP.

5.8. Seven group entities bought shares at prices higher than LTP from six other group entities. Six group entities aided seven group entities (buyers) by selling the shares. Thus the group entities indulged in trading amongst themselves and contributed to price rise in the scrip thereby manipulating the price of the scrip during December 16, to December 31, 2014. The relevant extract of the trades amongst the group entities from BSE trade log is placed as **Annexure-6 in CD**

5.9. Thus, the Noticees viz., 1) Maxtor Conclave Private Limited, 2) Blueview Tradevin Private Limited, 3) Jain Nemi Minerals Private Limited, 4) Keshavah Mercantile Private Limited, 5) Frohar Trading Private Limited, 6) Quickscope Dealers Private Limited, 7) Ambuja Commosales Private Limited were on buyer side and Noticees viz., 1) Anil Kumar Agarwala HUF, 2) Ecstatic Merchandise Private Limited,3) Hari Mohan Beriwala, 4) Santosh Devi Agarwal and 5) Sapna Agarwala were on seller side and the Noticee viz, Jain Nemi Minerals Private Limited was on buyer side and at seller side. The said Noticees by trading amongst themselves at prices higher than LTP, contributed to price rise in the scrip (contribution of Rs. 63.05 to market +ve LTP corresponding to 15.61% of market +ve LTP) and thereby indulged in an act which created false and misleading appearance of trading amounting to manipulation of the price of the scrip during December 16, to December 31, 2014 thereby violated Sec. 12 A (a), (b), (c) of SEBI Act, 1992 r/w Regulation 3(a),(b),(c),(d) and Regulation 4(1), 4(2) (a), (e) of SEBI (PFUTP) Regulations, 2003.

6. **Price Rise during January 01, 2015 to June 03, 2015**

6.1. During the period January 01, 2015 to June 03, 2015 the price of the scrip opened at Rs. 252.00, reached a high of Rs. 419.90 and closed at Rs. 401.20 i.e., a rise of 66.63% from the opening price.

6.2. It is observed that 15 Group entities (out of 44 Group entities) appeared as buyers during January 01, 2015 to June 03, 2015 of the investigation period. The buy trades of these 15 Group entities during January 01, 2015 to June 03, 2015 is given as under:

Sl. No.	Entity	All trades			LTP >0			LTP < 0			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	No of trades	Qty	
1	Dhanaasha Developers Private Limited	227.35	250	422100	254.3	47	117300	-26.95	32	76800	171	228000	16.06
2	Panchmadhu Projects Private Limited	99.7	58	142800	122	16	34200	-22.3	12	25800	30	82800	7.70
3	Maxtor Conclave Private Limited	70.5	127	232800	86.45	26	67800	-15.95	21	64200	80	100800	5.46
4	Quickscope Dealers Private Limited	58.05	161	207600	69.5	19	42600	-11.45	20	45600	122	119400	4.39
5	Dhanaseth Properties Private Limited	52.25	259	359700	86.35	37	80100	-34.1	31	53100	191	226500	5.45
6	Keshavah Mercantile Private Limited	49.25	45	130200	57.55	17	60600	-8.3	8	19800	20	49800	3.63
7	Tremendous Commodeal Private Limited	38.1	90	111000	44.2	8	22800	-6.1	7	12600	75	75600	2.79
8	Ecstatic Merchandise Private Limited	30.4	88	148800	88.1	12	16800	-57.7	20	45000	56	87000	5.56
9	Saktimata Marketing Private Limited	29.3	23	45600	30.45	9	15600	-1.15	3	7200	11	22800	1.92
10	Pragyan Realty Private Limited	21.95	33	98400	29.65	6	16800	-7.7	10	31200	17	50400	1.87
11	Nirdesh Trading Private Limited	13	2	11400	13	1	9600	-	-	-	1	1800	0.82

Sl. No.	Entity	All trades			LTP >0			LTP < 0			LTP = 0		% of +ve LTP to Mkt +ve LTP
		Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	Sum of LTP Diff	No of trades	Qty	No of trades	Qty	
12	Blueview Tradevin Private Limited	0.5	2	5400	0.5	1	4200	-	-	-	1	1200	0.03
13	Jain Nemi Minerals Private Limited	0.1	2	3000	0.1	1	1800	-	-	-	1	1200	0.01
14	Malakar Das Broking Services Private Limited	-0.25	2	5400	0.8	1	3000	-1.05	1	2400	-	-	0.05
15	Proficient Managerial Solutions Pvt. Ltd.	-0.4	53	84000	5	8	24300	-5.4	7	20700	38	39000	0.32
Group Total		689.80	1195	2008200	887.95	209	517500	-198.15	172	404400	814	1086300	56.07
Market Total		161.2	2637	4624100	1583.75	461	1078400	-1422.55	437	1023600	1739	2522100	100.00

6.3. It is observed from the table above that, 15 Group entities contributed Rs. 887.95 to +ve LTP (56.07% of market +ve LTP). Six group entities listed at sl. no. 1 to 6 in the table above, appeared in the list of top 10 entities that contributed +ve net LTP as buyers during January 01, 2015 to June 03, 2015.

6.4. It is observed from the table above, 13 group entities (sl. no. 1 to 13 of table above) had +ve net LTP and two group entities (sl. no. 14 to 15 of table above) had –ve net LTP contribution.

6.5. The net LTP contribution of the group entities at sl. no. 1 to 13 was Rs. 690.45 while the market net LTP was Rs. 161.20. Hence the +ve LTP trades of the group entities at sl. no. 1 to 13 have contributed significantly to market net LTP. Therefore, the trades of the group entities were analysed further.

6.6. From the trades of the Group entities that contributed to +ve net LTP it was observed that the Group entities had traded amongst themselves, the details of which are given as under:

Sl. no.	Buyers	Sellers (+ve LTP)	+ve LTP	% of mkt +ve LTP	No. of Trades
1	Dhanaasha Developers Pvt. Ltd.	1) Manju Beriwala (30.20) 2) Hari Mohan Beriwala and Others HUF (23.10) 3) Saurabh Kumar Agarwal HUF (8.90) 4) Quickscope Dealers Pvt. Ltd. (4.65)	67.75	4.28	12

Sl. no.	Buyers	Sellers (+ve LTP)	+ve LTP	% of mkt +ve LTP	No. of Trades
		5) Ecstatic Merchandise Pvt. Ltd. (0.70) 6) Proficient Managerial Solutions Pvt. Ltd. (0.20)			
2	Maxtor Conclave Pvt. Ltd.	1) Manju Beriwala (23.00) 2) Hari Mohan Beriwla (10.10) 3) Panchmadhu Projects Pvt. Ltd. (2.80) 4) Hari Mohan Beriwala and Others HUF (0.95) 5) Ecstatic Merchandise Pvt. Ltd. (0.70) 6) Quickscope Dealers Pvt. Ltd. (0.40)	37.95	2.40	9
3	Keshavah Mercantile Pvt. Ltd.	1) Hari Mohan Beriwla and Others HUF (25.10) 2) Manju Beriwala (2.50) 3) Quickscope Dealers Pvt. Ltd. (0.20)	26.80	1.69	4
4	Panchmadhu Projects Pvt. Ltd.	1) Hari Mohan Beriwala and Others HUF (15.30)	15.30	0.97	2
5	Nirdesh Trading Pvt. Ltd.	1) Ecstatic Merchandise Pvt. Ltd. (13.00)	13.00	0.82	1
6	Dhanaseth Properties Pvt. Ltd.	1) Sarda Solutions Pvt. Ltd. (5.90) 2) Panchmadhu Projects Pvt. Ltd. (0.80) 3) Ecstatic Merchandise Pvt. Ltd. (0.40) 4) Sarwani Devi Modi (00.10) 5) Maxtor Conclave Pvt. Ltd. (0.10) 6) Quickscope Dealers Pvt. Ltd. (0.05)	7.35	0.46	6
7	Quickscope Dealers Pvt. Ltd.	1) Dhanaseth Properties Pvt. Ltd. (1.10) 2) Pragyan Realty Pvt. Ltd. (0.20)	1.30	0.08	2
8	Pragyan Realty Pvt. Ltd.	1) Hari Mohan Beriwala and Others HUF (0.75) 2) Manju Beriwala (0.50)	1.25	0.08	2
9	Ecstatic Merchandise Pvt. Ltd.	1) Dhanaseth Properties Pvt. Ltd. (0.30)	0.30	0.02	1
	Total		171.00	10.80	39

6.7. It is observed from the above table that, nine group entities by trading with other group entities contributed Rs. 171.00 to market +ve LTP in 39 trades which is 10.80% of market +ve LTP.

6.8. Nine group entities bought shares at prices higher than LTP from 13 other group entities. 13 group entities aided nine group entities (buyers) by selling the shares. Thus the group entities indulged in trading amongst themselves and contributed to price rise in the scrip thereby manipulating the price of the scrip during January 01, 2015 to June 03, 2015. The relevant extract of the trades amongst the group entities from BSE trade log is placed as **Annexure-7 in CD.**

6.9. It is thus alleged that the Noticees viz., 1) Dhanaasha Developers Pvt. Limited 2) Maxtor Conclave Private Limited, 3) Keshavah Mercantile Private Limited, 4) Panchmadhu Projects Pvt. Ltd., 5) Nirdesh Trading Pvt. Limited, 6) Dhanaseth Properties Pvt. Limited, 7) Quickscope Dealers Private Limited, 8) Pragyan Realty Pvt. Limited and 9) Ecstatic Merchandise Private Limited were

on the buyer side. The Noticee viz, 1) Hari Mohan Beriwala HUF, 2) Manju Beriwala, 3) Hari Mohan Beriwala, 4) Saurabh Kumar Agrawal HUF, 5) Sarda Solutions Pvt. Limited, 6) Proficient Managerial Solutions Pvt. Limited and 7) Sarwani Devi Modi were on seller side. The Noticees viz., Dhanaasha Developers Pvt. Limited, Ecstatic Merchandise Private Limited, Maxtor Conclave Private Limited, Panchmadhu Projects Pvt. Limited, Pragyan Realty Pvt. Limited and Quickscope Dealers Private Limited were on buyer side and seller side. The said Noticees by trading amongst themselves at prices higher than LTP, contributed to price rise in the scrip (contribution of Rs. 171.00 to market +ve LTP corresponding to 10.80% of market +ve LTP) and thereby indulged in an act which created false and misleading appearance of trading amounting to manipulation of the price of the scrip during January 01, 2015 to June 03, 2015 thereby violated Sec. 12 A (a), (b), (c) of SEBI Act, 1992 r/w Regulation 3(a),(b),(c),(d) and Regulation 4(1), 4(2) (a), (e) of SEBI (PFUTP) Regulations, 2003.

7. It is observed that the details of group entities that indulged in price manipulation and whose net sell value (sell value – buy value) was Rs. 50 Lakhs or more during the investigation period is tabulated below:

Table 17

S.No.	Entity	Buy Value	Sell Value	Sell Qty	Net Sell Value
1	Hari Mohan Beriwala	-	3,46,83,090	1,00,200	3,46,83,090
2	Hari Mohan Beriwala and Others HUF	-	3,34,07,070	99,600	3,34,07,070
3	Manju Beriwala	-	3,29,34,720	1,00,200	3,29,34,720
4	Santosh Devi Agarwal	-	1,59,06,390	39,600	1,59,06,390

It is observed from para 5 and 6 and above table that, four group entities namely, Hari Mohan Beriwala, Santosh Devi Agarwal, Hari Mohan Beriwala and Others HUF and Manju Beriwala have indulged in an act which created false and misleading appearance of trading amounting to manipulation of the price of the scrip and benefited by selling substantial value of shares of Sunstar during the investigation period.

8. The applicable provisions are reproduced as under:

CHAPTER II
PROHIBITION OF FRAUDULENT AND UNFAIR TRADE PRACTICES RELATING TO THE SECURITIES MARKET

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;
.....

(e) any act or omission amounting to manipulation of the price of a security;
.....

9. The aforesaid violations on your part make you liable for penalty under Sections 15 HA of SEBI , 1992, as applicable, which reads as follows:

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

10. It is observed that SEBI had taken action against the following entities:

Sl. No.	Name of the Entity	Case Name	Regulatory Actions
1	Maxtor Conclave Pvt. Ltd.	Kailash Auto Finance Limited	Action under Section 11 - Vide WTM Order dated March 29, 2016, the entity was restrained from accessing the securities market and buying, selling or dealing in securities, either directly or indirectly, in any manner, till further directions.
2	Keshavah Dealtrade Private Limited		
3	Quickscope Dealtrade Private Limited		
4	Ecstatic Merchandise Private Limited		
5	Dhanaasha Developers Pvt. Ltd.		
6	Panchmadhu Projects Private Limited		
7	Dhanaseth Properties Pvt. Ltd.		
8	Pragyan Realty Pvt. Ltd.		
9	Sarda Solutions Pvt. Ltd.		
10	Proficient Managerial Solutions Pvt. Ltd.		

In view of the above table, it is alleged that, the Noticees Maxtor Conclave Pvt. Ltd. Keshavah Dealtrade Private Limited Quickscope Dealtrade Private Limited Ecstatic Merchandise Private Limited Dhanaasha Developers Pvt. Ltd. Panchmadhu Projects Private Limited Dhanaseth Properties Pvt. Ltd. Pragyan Realty Pvt. Ltd. Sarda Solutions Pvt. Ltd and Proficient Managerial Solutions Pvt. Ltd are in repetitive violation of SEBI Act, 1992 and Rules and Regulation made there under.

11. Reply from the Noticee, if any, should reach the undersigned, within 14 days from the date of receipt of this Show Cause Notice and Soft copy of your reply be provided in DOCX or XLSX formats via e-mail at ead-8@sebi.gov.infailing which it shall be presumed that you have no reply to submit and the matter shall be further proceeded with on the basis of the evidence available on record in terms of sub-rule (7) of Rule (4) of the Adjudication Rules. You may also indicate in your reply whether you desire a personal hearing in the matter. You may also indicate whether you desire a personal hearing in the matter.

Securities and Exchange Board of India
SEBI Bhavan
Plot No. C4-A, "G" Block,
BandraKurla Complex, Bandra (E)
Mumbai – 400 051

12. Kindly submit a photocopy of your PAN card and update your correspondence address, emails ids, phone numbers, fax numbers, etc, so that we have a clear line of communication until the conclusion of these proceedings.

Jeevan Sonparote
Adjudicating Officer

Enclosure to this notice:

Annexure	Particulars of the Annexure	No. of pages
A	The copy of the communique dated March 28, 2018	2
1	The copies of KYC	In CD
2	The UCC data received from BSE	In CD
3	The scan copies of details on MCA website	In CD
4	The scan copies of bank account statements	In CD
5	The details of off market transactions indicating the basis of connections	In CD
6	The relevant extract of the trades amongst the group entities from BSE trade log in respect of Noticees stated at para no. 5	In CD
7	The relevant extract of the trades amongst the group entities from BSE trade log in respect of Noticees stated at para no. 6	In CD

Annexure - A

SECURITIES AND EXCHANGE BOARD OF INDIA
Communication of Order appointing Adjudicating Officer

1. Securities and Exchange Board of India (SEBI) conducted Investigation into the trading activities of certain entities in the scrip of Sunstar Realty Development Limited and into the possible violation of the provisions of SEBI Act, 1992 (SEBI Act) and the relevant rules and regulations made thereunder.

2. Whereas it prima facie appeared to the Whole Time Member that the following entities have violated the provisions of regulation/acts as shown in the tables below;

Sl. No.	Name of entity (PAN)	Violation of SEBI Act/ Rules / Regulations	Action Recommended
1	M/s.Maxtor Conclave Pvt Ltd (AAICM5727H)	Sl. no. 1 to 23 Sec. 12 A (a), (b), (c) of SEBI Act, 1992 r/w Regulation 3(a), (b), (c), (d) and Regulation 4(1), 4(2), (a), (e) of SEBI (PFUTP) Regulations, 2003	Sl. no. 1 to 23 Adjudication u/s 15HA of SEBI Act, 1992
2	M/s.Blueview Tradevin Pvt. Ltd. (AAECB8239K)		
3	M/s.Jain Nemi Minerals Pvt. Ltd. (AACCJ4323L)		
4	M/s.Keshavah Mercantile Pvt. Ltd. (AAECK7235N)		
5	M/s.Frohar Trading Pvt. Ltd. (AACCF0551A)		
6	M/s.Quickscope Dealers Pvt. Ltd. (AANCS8376B)		
7	M/s.Ambuja Commosales Pvt. Ltd. (AAICA1638F)		
8	M/s.Anil Kumar Agarwala HUF (AAEHA4449K)		
9	M/s.Ecstatic Merchandise Pvt. Ltd. (AABCO4034C)		
10	Mr.Hari Mohan Beriwala (ADXPB6833G)		
11	Ms.Santosh Devi Agarwal (ADAPA1940Q)		
12	Ms.Sapna Agarwala (AEOPA8422Q)		
13	M/s.Dhanaasha Developers Pvt. Ltd. (AAECD6470G)		
14	M/s.Panchmadhu Projects Pvt. Ltd. (AAHCP0443J)		
15	M/s.Nirdesh Trading Pvt. Ltd. (AABCN1526E)		
16	M/s.Dhanaseth Properties Pvt. Ltd. (AAECD6471H)		
17	M/s.Pragyan Realty Pvt. Ltd. (AAHCP1157B)		
18	M/s.Hari Mohan Beriwala and others HUF (AAAHH9893J) (Mr. Hari Mohan Beriwla (sl. no. 10) is the entity behind this juridical person)		
19	Ms.Manju Beriwala (ADDPB1460H)		
20	Ms.Saurabh Kumar Agrawal HUF (AAUHS5431F)		
21	M/s.Sarda Solutions Pvt. Ltd. (AATCS2316K)		
22	M/s.Proficient Managerial Solutions Pvt. Ltd. (AAHCP1982C)		
23	Ms.Sarwani Devi Modi (ADUPM9995M)		

3. And whereas the Whole Time Member is satisfied that there are sufficient grounds to inquire into and adjudicate upon the alleged violations of the aforesaid entities.

4. And whereas as per Delegation of Power (amended), the Executive Director has appointed **Shri Jeevan Sonparote, Chief General Manager** as the Adjudicating Officer, vide noting dated March 16, 2018 to enquire into and adjudge under Section 15HA of the SEBI Act for the alleged violations by the aforesaid entities.

5. The said proceedings of appointment are hereby communicated to **Shri Jeevan Sonparote, Chief General Manager**, to conduct the Adjudication Proceedings in the manner specified under Rule 4 of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 **(Rules)**.

6. The Adjudicating Officer shall inquire into and adjudicate the alleged violation as stated above and if satisfied that the entities have become liable to penalty, may impose such penalty, as he thinks fit, in terms of rule 5 of the Rules and the provisions of Section 15HA of the SEBI Act as mentioned in the table above.

Dated at Mumbai, this 28th day of March, 2018

SAKKEENA P.V.
DEPUTY GENERAL MANAGER
SECURITIES AND EXCHANGE BOARD OF INDIA