

SECURITIES AND EXCHANGE BOARD OF INDIA

ORDER

Under Regulation 27(5) of the Securities and Exchange Board of India (Intermediaries) Regulations, 2008

In respect of: -

**Arth Stock Broking Private Limited
(Member: Ahmedabad Stock Exchange Ltd)
Reg. No: INB021084836**

**(Sub broker – Bombay Stock Exchange Ltd)
Reg. No: INS010790330**

**803, Abhijeet I,
Mithakhali Circle,
Ellisbridge,
Ahmedabad - 380006**

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1. The present proceeding is emanating from the Enquiry Report dated July 30, 2021 (hereinafter referred to as the "**Enquiry Report**") submitted in terms of Regulation 26 of the Securities and Exchange Board of India (Intermediaries) Regulations, 2008 (hereinafter referred to as "**the Intermediaries Regulations**"), wherein the Designated Authority (hereinafter referred to as "**DA**"), based on the factual findings so recorded in the said Enquiry Report, has recommended that the registration of Arth Stock Broking Private Limited (hereinafter referred to as "**Noticee/Arth**"), as a Stock broker of Ahmedabad Stock Exchange Ltd. and as a Sub-broker of Bombay Stock Exchange be cancelled.
 2. The aforesaid Enquiry Report was submitted pursuant to a proceeding which was initiated from the investigation conducted by Securities and Exchange Board of India (hereinafter referred to as "**SEBI**") into the irregularities observed in relation to the

Initial Public Offerings (hereinafter referred to as “**IPOs**”) of several companies during the period of 2003-2005 (herein after referred to as “**investigation period/ IP**”). As the facts unearthed during the investigation indicated *prima facie* violation of various provisions of Securities and Exchange Board of India Act, 1992 (hereinafter referred to as the “**SEBI Act, 1992**”), SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations, 2003 (hereinafter referred to as “**PFUTP Regulations**”), SEBI (Stock Brokers and Sub Brokers) Regulations, 1992 (hereinafter referred to as “**Stock Broker Regulations**”) etc., a Designated Authority (hereinafter referred to as the “**DA**”) was appointed to enquire into such alleged violations by the *Noticee*.

3. The DA had issued a Show Cause Notice dated March 14, 2011 to the *Noticee* under Regulation 25 of the Intermediaries Regulations, alleging the violation of Sections 12A (a), (b) & (c) of the SEBI Act, 1992, Regulations 3 (a), (b) & (c) and 4(1) of the PFUTP Regulations, Clauses A (1) and A (2) of the Code of Conduct for Stock Brokers specified in Schedule II read with Regulation 7 & 15 of the Stock Broker Regulations and SEBI Circular No. MRD/SE/Cir-33/2003/27/08 dated August 27, 2003. The said Show Cause Notice called upon the *Noticee* to show cause to why action be not taken under Regulation 27 of the Intermediaries Regulations as it stood at the relevant point of time till its amendment carried out vide SEBI (Intermediaries) (Amendment) Regulations, 2021 w.e.f. January 21, 2021.
4. In order to appreciate the issues involved in the present matter, it may be necessary to cull out the facts from the records relevant for the purpose, which are highlighted herein below:
 - I. During the investigation period, the *Noticee* was a Member of Calcutta Stock Exchange and Ahmedabad Stock Exchange and was also a sub-broker of BSE Limited, attached with ACML Capital Markets Limited (hereinafter referred to as “**ACML**”), a member of BSE.

- II. Several entities/persons who were termed as Key Operators, were found to be engaged in cornering/acquiring shares in the IPOs of various companies during the investigation period, by making fictitious applications in the category reserved for retail investors through the medium of thousands of fictitious /benami applicants for the IPOs.
- III. Another set of entities who were termed as Financiers, had aided the Key Operators by providing finance to them for the purpose of making applications for those IPOs.
- IV. The *Noticee* herein, viz., Arth Stock Broking Private Limited was found to be one of the Financiers who had aided the Key Operators.
- V. The IPO of TV Today opened for subscription on December 18, 2003 and closed on December 27, 2003 and its shares got listed on the Exchange platform on January 16, 2004. The *Noticee* had received 41,200 shares in off-market transactions from Devangi Panchal (one of the Key Operators) on January 15, 2004, i.e., one day before the day of listing of the shares. The said shares so received by the *Noticee* were sold in the client account of another entity viz., Grace Investments and the proceeds so received from the sale were transferred to the bank account of Dipak Panchal.
- VI. Similarly, the IPO of TCS had opened on July 29, 2004 and closed on August 05, 2004 and the shares were listed on the Exchange platform on August 25, 2004. The *Noticee* had received 3,000 shares, 1,500 shares and 10,000 shares of TCS in off-market transactions from the Key operators viz., Sugandh Estates and Investments Private Limited (**SEIPL**), Ambuja Estate and Holdings Private Limited (**Ambuja**) and Dipak Panchal, respectively on August 25, 2004. On the very next day, the shares received from SEIPL and Ambuja were transferred back to them by the *Noticee*. The shares received back by SEIPL were further transferred to another Financier viz., Excel Multitech Limited, whereas Ambuja had transferred 1000 shares to one Mr. Gautam N. Jahveri and 500 shares to Mr. Rajesh Kumar Patel, both of whom were also identified as Financiers in the investigation of SEBI. The 10,000 shares received from Dipak Panchal were sold by the *Noticee* in the market and the proceeds were retained by it. Based on the aforesaid transactions, the *Noticee* was observed to have

financed the Key Operators viz., Devangi Panchal, SEIPL, Ambuja and Dipak Panchal for the purpose of cornering the shares allocated for the Retail Individual investors and in the said process, the *Noticee* had made ill-gotten gains of INR 43 Lakh (approx.).

- VII. Arth, SEIPL, Dipak Panchal and Ambuja enjoyed inter-se connections with each other. Mr. Kamal Jhaveri, Mr. Parag Jhaveri and Mr. Bhargav R. Panchal are/were the Directors of Arth, whereas, Mr. Parag is/was also one of the Directors of SEIPL and Ambuja. Further, Mr. Dipak Panchal, Devangi Panchal and Bhargav R. Panchal are all family members.
- VIII. Further, (as recorded in the interim order dated April 26, 2006) Dipak J. Panchal is/was one of the Directors of Arth and Devangi Panchal is one of the largest shareholder of Arth. Apart from Devangi Panchal, Arth Realty Private Limited is another largest shareholder, and the said company shared its address with SEIPL.
5. Based on the above, the *Noticee* was alleged to have acted in violation of the provisions of law as stated in the SCN by not observing fair conduct while dealing in securities on behalf of its clients and engaged in giving credit of sale proceeds to the account of another client, other than the client from which shares/securities were received. The *Noticee* in response to the aforesaid Show Cause Notice dated March 14, 2011 filed a written reply dated April 27, 2011. In the said reply, the *Noticee* contended that being a member of Ahmedabad Stock Exchange and a sub-broker registered with ACML, it has always carried out transactions on behalf of its clients and has never financed any entity for acquiring shares in an IPO. The *Noticee* further submitted that:
- I. The 3000 shares of TCS were transferred by SEIPL as client of Arth on August 25, 2004 for early payout and the same were transferred by Arth to ACML. However, as the sell orders were not executed therefore, the shares were transferred back to SEIPL on August 26, 2004. Similarly, the 1500 shares of TCS transferred by Ambuja were returned back as the sell orders were not executed.

- II. 41200 Shares of TV today (two transactions of 28200 and 13000 shares) were received by Arth on January 15, 2004. The said shares were received by Arth on behalf of M/s Grace Investments, wherein Mr. Dipak J. Panchal was the proprietor and the said shares were transferred from the joint demat account of Devangi D. Panchal and Dipak J. Panchal. From January 19, 2004 till February 19, 2004, numerous transactions (sell/purchase) were executed by Arth on behalf of Grace Investments and ultimately, on April, 12, 2004, Arth had transferred 12940 shares of TV Today Limited to Grace Investments on its instructions.
- III. Further, 10000 shares of TCS were received from the demat account of Mr. Dipak J. Panchal, proprietor of Grace Investment. 2500 shares were sold on behalf of Grace Investment on August 25, 2004 and the proceeds were paid to Mr. Dipak J. Panchal and the remaining 7500 shares were returned to Mr. Dipak J. Panchal on September 08, 2004.
- IV. In view of the aforesaid factual details, it is evident that the transaction of shares and payments pertain to the same client and thus it cannot be termed to be irregular so as to be violative of securities laws.
- V. Further, the factual position as to Directorship and relationship amongst certain individuals as stated in the SCN cannot be automatically treated to make the *Notinee* as a part of any transactions executed by the individuals in their personal capacity, through the *Notinee* as their broker.
- VI. As the *Notinee* has not financed any entity, the allegation of making unlawful profits would not sustain. The above finding does not survive for the reason that in the order dated February 25, 2011 passed against Devangi Panchal, Dipak Panchal and others, the profits earned by them has also considered and included the profits earned in the sale of 41,200 shares of TV today and 10,000 shares of TCS by the above two Panchals.
- VII. The restraint imposed vide the interim order dated April 27, 2006, has led to suspension of the certificate of registration without any further order.

6. The *Noticee*, thereafter, also issued other communications, wherein largely the aforesaid assertions were reiterated. Further, after the submission of the report by the DA, another Show Cause Notice dated August 31, 2021, (hereinafter referred to as the "**SCN**"), has been issued to the *Noticee* asking it as to why the recommendation made by the DA or any other measure be not taken against it, in terms of Regulation 27 of the Intermediaries Regulations. In response to the SCN, the *Noticee* vide its letter dated September 27, 2021 reiterated its earlier submissions. Since, the recommendation by the DA was for cancellation of the certificate of registration, a personal hearing in the matter was fixed for March 09, 2022, and in response to the said hearing notice, the *Noticee* again made certain submissions vide its letter dated March 07, 2022. As the hearing could not be conducted on the said day, another opportunity for hearing was granted by scheduling a personal hearing on April 21, 2022. However, the *Noticee* did not appear for the said personal hearing and vide its letter dated April 25, 2022, it has been submitted on behalf of the *Noticee* that it did not wish to attend the personal hearing as detailed written replies have already been filed in the matter. Thus, in view of the said statement, I observe that sufficient opportunities have been accorded to the *Noticee* and I need to proceed further to deal with the matter on merit.
7. The summary of assertions made in the aforestated letters dated September 27, 2021 and March 09, 2022 are as under:
- I. The Enquiry proceedings initiated against the *Noticee* are still kept pending in view of the reinvestigation ordered by the SEBI's order dated June 12, 2015 and March 30, 2016. In the opinion of the DA, the said reinvestigation has a bearing on the case against the *Noticee*.
 - II. The *Noticee* was acting as a Stock Broker of Ahmedabad Stock Exchange (ASE) and a sub-broker of Bombay Stock Exchange. The recognition granted to ASE has been withdrawn w.e.f April 02, 2018 and the category of Sub-brokers has been discontinued as a Market intermediary since March 31, 2019. As recorded in the Enquiry Report, the *Noticee* is not a member of any Stock Exchange and

also not a sub-broker attached to any Stock Exchange. Based on the said factual developments, the registrations of the *Noticee* are as good as cancelled.

III. The restraint imposed on the *Noticee* vide interim order dated April 27, 2006 is still operational against the *Noticee* and the matter is not being disposed of on the pretext of the reinvestigation directed in the case of Devangi Panchal and Dipak Panchal. The allegation that the *Noticee* acted as Financer is denied as all transactions were entered into by *Noticee* by virtue of its broker-client relationship.

IV. Further, arising out of the same facts, Adjudication proceedings were also initiated, however, the Adjudicating Officer has disposed of the said proceedings without imposing any penalty and therefore, the present proceedings also deserve to be disposed of.

8. I note from the records that the central charge against the *Noticee* is that it has traded in the account of one entity, whereas the proceeds of such trades have been paid to another entity, with the following details:

(i) The transactions executed by the *Noticee* in the shares of TV Today, wherein it received shares from Devangi Panchal; sold such shares in the account of Grace and paid the proceeds to Dipak Panchal, are highly irregular and in violation of the SEBI's Circular no. MRD/SE/Cir-33/2003/27/08 dated August 27, 2003, and the said acts show the involvement of the *Noticee* in the fraud committed by SEIPL, Devangi, Dipak, etc.;

(ii) The 10,000 shares of TCS received from the account of Dipak Panchal were sold on the market platform by the *Noticee* and the proceeds were retained by the *Noticee*, leading to an unlawful gain of INR 43 Lakh (approx.) to the *Noticee*.

9. At the outset, I observe that there is no dispute raised by the *Noticee* to the factual position with respect to the common Directorship of Mr. Parag Jhaeveri on its Board as well as on the Boards of SEIPL and Ambuja, the entities from whose account, shares

were received by the *Noticee*. Further, it is also not disputed that Mr. Bhargav R. Panchal, Director of the *Noticee*, (who has also filed the reply dated March 07, 2022 in the present proceedings) is the family member of Dipak Panchal and Devangi Panchal, the individual entities who had transferred the shares to the *Noticee*. The only defence that is supposed to have been created by the *Noticee* concerning the connection with aforesaid entities is that the transactions entered with the aforesaid entities was in the nature of broker-client relationship and merely because of some connection, the *Noticee* cannot be held responsible for the said transactions executed by its connected entities in their individual capacities.

10. With regard to the aforesaid averment pertaining to the connection between the entities, I observe that the said facts of connections indeed forms the foundation of the allegations in this case, indicating that due to the close proximity between the group of entities, the meeting of their minds to execute any illicit transaction in securities market is more probable, more so when the concerned entities are Director of the *Noticee* (Dipak Panchal) and shareholder of the *Noticee* (Devangi Panchal). Therefore, it is obligatory on the *Noticee* to demonstrate as to how the transactions that gave rise to the allegations are *bonafide* and were executed in the strict realm of the professional relationship of broker-client and were not loathed with any kind of illicit intent. Thus, the analysis of the explanations furnished with respect to the said transactions would be the deciding factor as to whether such transactions were purely in the nature of the broker-client relationship or otherwise.
11. Before proceeding further, I deem it fit to have a look at the aforesaid Circular no. MRD/SE/Cir-33/2003/27/08 dated August 27, 2003, which *inter alia* directs as:

Sub:- Mode of payment and delivery

1. Please refer to SEBI circular No. SMD/SED/CIR/93/23321 and letter No. SMD-1/23341 dated November 18, 1993 regarding regulation of transactions between clients and brokers.
2. It is reiterated that brokers and sub-brokers should not accept cash from the client whether against obligations or as margin for purchase of securities and/ or give cash against sale of securities to the clients.

3. All payments shall be received/made by the brokers from/to the clients strictly by account payee crossed cheques/demand drafts or by way of direct credit into the bank account through EFT, or any other mode allowed by RBI. The brokers shall accept cheques drawn only by the clients and also issue cheques in favour of the clients only, for their transactions. However, in exceptional circumstances the broker or sub-broker may receive the amount in cash, to the extent not in violation of the Income Tax requirement as may be in force from time to time.

4. Similarly in the case of securities also giving / taking delivery of securities in “demat mode” should be directly to/from the “beneficiary accounts” of the clients except delivery of securities to a recognized entity under the approved scheme of the stock exchange and / or SEBI. (underline supplied)

12. It is noted that the Noticee has furnished its explanation for all the alleged transactions.

After carefully perusing all the transactions, I deem it fit to first tabulate the details of the transactions so as to have a holistic view of the said transactions:

Sr. no.	Name of the scrip	Details of shares received by the Noticee	Action taken by the Noticee
1.	TCS	3000 shares received from SEIPL	Transferred back to SEIPL
		1500 share received from Ambuja	Transferred back to Ambuja
		10,000 shares received from	As per the SCN, the said 10,000 shares were sold by the Noticee and proceeds were retained by it.

		Dipak Panchal	As per the reply of the <i>Noticee</i> , 2,500 shares were sold in the account of Grace Investment (proprietorship firm of Dipak Panchal) on August 25, 2004 and the proceeds were paid to Dipak Panchal; and the remaining 7500 shares were returned to Dipak Panchal on September 08, 2004.
2.	TV today	41,200 shares received from Devangi Panchal	The 41,200 shares received from Devangi were sold in the account of Grace Investments and the proceeds of the sale were transferred to the bank account of Dipak Panchal. As per the <i>Noticee</i>, the shares were received from the joint demat account of Dipak and Devangi and the shares were sold in the account of Grace Investment which was the proprietorship firm of Dipak Panchal and sale proceeds were paid to Dipak Panchal.

13. From the aforementioned details, I can decipher that the *Noticee*, while acting as a stock broker has displayed an attitude which can be termed as grossly callous and blatantly inappropriate and not in due adherence with the general standards as required to be followed by a registered intermediary. I observe that firstly, at the relevant time, there was no regulatory requirement for the clients holding the shares to offer the shares to the broker beforehand towards the purported “early pay-out” and instead, the requirement was that only after execution of the sale transaction through the stock broker, the selling client was under obligation to provide the shares for the pay-out. The claim of the *Noticee* that the shares were returned next day as the limit orders were not executed, is of no help and rather it further manifests the collusive nexus and role of the *Noticee* in collusion with other entities. It goes beyond comprehension as to why the

entities who are connected to the present *Noticee*, transferred their shares to the *Noticee* before execution of the trade; and after keeping such shares for a single day and after placing some limit order (details of which are not been furnished in the present proceedings), the shares were transferred back by the *Noticee* to the originating source/connected entities. I observe that the *Noticee*, being a registered sub-broker was under an obligation to maintain high standards of integrity and fairness in its conduct, however, by executing such suspicious transactions with its connected entities, it appears that the *Noticee* lacked in its conduct to maintain such level of integrity, as it was expected to discharge. The same was required not only to maintain fairness in its transactions but also to demonstrate that their acts were indeed in compliance with the provisions in force at that point in time.

14. It is noted that the allegation against the *Noticee* is primarily of acting in violation of the Code of Conduct provided under the Stock Broker Regulations, read with the specific circular dealing with the mode and manner of giving credit to securities and sale proceeds. From the examination of facts, I find that it has engaged in acts of receiving shares from an entity and giving credit of proceeds after the sale, to another entity. The submission of the *Noticee* that the same was done as some of the persons behind the two entities were common, does not fall within the four corners of law governing the pay-in and pay-out obligation relating to the transaction in securities. Since, the allegation against the *Noticee* is about acting in violation of the aforesaid Circular dated August 27, 2003 and the provisions of the Code of Conduct for the Stock Broker, it acquires significance on analysing in the background of undisputed facts that Dipak, Devangi and Grace were trading in securities as retail clients and were otherwise inextricably linked with the *Noticee*, as directly and indirectly majority of shareholding was owned and controlled by Dipak and Devangi. Examination of the acts and conduct of the *Noticee* under these circumstances speaks volumes about the collusiveness of the *Noticee* with other entities and not acting fairly in due compliance of law, when it is seen that the *Noticee* has sold the shares of TV Today received from a joint account of two individuals (Devangi and Dipak Panchal), in the name of a proprietorship firm (Grace Investments)

of one of such individual (Dipak Panchal) and paid the proceeds to the bank account of such proprietor (Dipak Panchal). The *Noticee* has attempted to come out clean by claiming that it has maintained separate accounts for Grace Investments, Devangi Panchal and Dipak Panchal. It has also been contended that the transaction in the shares of TV Today was authorised by Ms. Devangi Panchal and Grace Investments. Further, with respect to the transactions executed in the shares of TCS too, the *Noticee* has offered a similar explanation that shares were received from the account of Dipak Panchal, and were sold in the accounts of his proprietorship firm Grace Investments and the proceeds were paid to Dipak Panchal.

15. Having gone through the said arguments, I observe that the same are not worthy of acceptance by any level of reasonableness. I observe that irrespective of the level and nature of closeness of different entities, a stock broker like the *Noticee* is under no obligation to settle the transaction in the account of one entity and make payment to another entity, even though it has received authorisation for such transaction. The inter-se financial transactions of the entities who are merely clients of the *Noticee* as per its own claim, are not to be settled by the *Noticee*, whose role is limited to executing securities transactions on the behalf of such clients in their respective individual accounts. The *Noticee*, being a registered intermediary is required to act in strict compliance with the law. A perusal of applicable laws makes it evident that no such liberty was accorded to accommodate transactions whereby the acts of *Noticee* could be held justified when it has undeniably received securities from one individual account and sale proceeds were credited to another individual account. The *Noticee* being a registered intermediary, is required to maintain clarity while transacting in securities, more particularly, when it pertains to entities enjoying connection with it. It should clearly demarcate its role as a broker while acting as a registered intermediary for its clients and ought not to mix-up the transactions of two or more accounts only because the entities are known and connected to it. It should strictly maintain and observe arm's length distance, while dealing with entities bearing connection and can't indulge in activities not permitted under the law, merely on the premise that the entities were connected with

each other and have given authorisation to it for such mixed-up transactions. Thus, going by the straight logic, the *Notinee* ought to have sold the shares only in the account of the client from whom such shares have been received and accordingly, the payment of such sale proceeds also ought to have been made to such client only. I am constrained to observe that the aforesaid conduct of the *Notinee* of inter-mingling the transactions between two or more client accounts certainly carried a huge potential to act as a catastrophe in the securities market.

16. It would not be a justifiable reason to offer that the connected entities were being operated by common persons and that there was also an authorisation for carrying out those impermissible transactions. I also don't find merit in the submission that merely because the entities were enjoying some common constituents, there can't be a fault on its part when the proceeds are credited to an account different from the account from where the shares were received for effecting the said sale. In this respect, the aforesaid submission of the *Notinee* is not found to have the support of law as the extant laws did not provide any exception to deviate from the general rule in cases where entities are having common constituents.
17. It is also relevant to mention here that by virtue of SEBI's Circular no. MRD/SE/Cir-33/2003/27/08 dated August 27, 2003, the *Notinee* was under a bounden obligation to receive shares only from the demat account of the client and in case of payments of sale proceeds, the payment needs to be made by way of cheques in favour of the said client only. In the present case, however, the shares of TV Today were received from Devangi Panchal (Party no. 1), and after receipt by the *Notinee*, the shares were sold in the account of Grace Investments (Party no. 2) and the relevant sale proceeds were transferred to Dipak Panchal (Party no. 3). Similarly, the shares of TCS were received from Dipak Panchal (Party no. 1), but were sold in the account of Grace Investments (Party no. 2) and proceeds were transferred in the account of Dipak Panchal (Party no. 1).
18. When the aforesaid impugned transactions executed by the *Notinee* are seen in the backdrop of the aforesaid Circular, it does not fit anywhere in the regular framework as

prevailed at that time, as the shares were sold in the account of Grace Investments, to which the said shares never belonged to and the proceeds were paid to Dipak Panchal, even though the sale transaction was not executed in his account. The said Circular does not carve out any exemption so as to allow a broker to execute such types of complex transactions wherein no heed to any regulatory or business prudence norms has been paid by the *Noticee*, who being a registered intermediary was very much expected to stay compliant with all the directives of SEBI, both in letter and spirit.

19. However, as demonstrated above, the *Noticee* has not followed a straight and logical path as it ought to have followed being a market intermediary and the conduct exhibited by the *Noticee* is certainly an aberration and in defiance of the aforesaid directive of SEBI. The *Noticee* has offered some explanations, which have clearly been found to be unworthy of acceptance and specious. Thus, in view of the above, the explanation furnished by the *Noticee* when seen in the light of its close inter-se connection between the entities explained earlier, grossly falls short to answer the allegations made in the SCN to my satisfaction. Under the circumstances, the recommendation given by the DA for cancellation of the registration of the *Noticee* is fully justified and is vindicated by the facts of the case, and the *Noticee* ordinarily does not deserve to hold a registration as an intermediary to operate in the securities market.
20. Having observed and already held above that the acts of the *Noticee* were not in due compliance with the law as alleged in the SCN, hence, the *Noticee* as a registered intermediary is liable to suffer cancellation of its registration, as recommended by the DA. However, the facts available on record now suggest that due to various factual and regulatory developments in the past, the *Noticee* has since ceased to be a stock broker and sub-broker, as it used to be at the time of initiation of the present proceedings. Further, by virtue of the derecognition of Ahmedabad Stock Exchange and also due to discontinuance of the category of Sub-brokers, there does not appear to be any “functional registration” of the *Noticee* connecting it with the securities market. Further, it is also noticed that the Adjudicating Officer, in a separate proceedings arising out of

the same cause of action, has disposed of the proceedings against the *Noticee* without imposing any monetary penalty. However, keeping in view the gross misconduct and serious non-compliance committed by the *Noticee*, as clearly brought out in the preceding paragraphs, the *Noticee* is hereby strongly warned to take extreme caution and conduct itself in a fair and honest manner in future, should it ever decide to get associated with the securities market as an intermediary.

21. As a consequence of the aforesaid discussions and directions, the restraint imposed on the *Noticee* vide the interim order dated April 27, 2006 becomes redundant and need not be pursued further.

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DATE: 03rd JUNE, 2022

S. K. MOHANTY

PLACE: MUMBAI

WHOLE TIME MEMBER

SECURITIES AND EXCHANGE BOARD OF INDIA