

**BEFORE THE ADJUDICATING OFFICER**  
**SECURITIES AND EXCHANGE BOARD OF INDIA**  
**[ADJUDICATION ORDER NO. EAD-5/SVKM/AO/48/2017-18]**

**UNDER SECTION 15-I OF SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992 READ WITH RULE 5 OF SEBI (PROCEDURE FOR HOLDING INQUIRY AND IMPOSING PENALTIES BY ADJUDICATING OFFICER) RULES, 1995 AND UNDER SECTION 23I OF SECURITIES CONTRACT (REGULATION) ACT, 1956 READ WITH RULE 5 OF SECURITIES CONTRACTS (REGULATION) PROCEDURE RULES, 2005**

**In respect of**  
**Santowin Corporation Ltd.**  
**(PAN: AADCS9595G)**

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**FACTS OF THE CASE IN BRIEF**

1. Securities and Exchange Board of India (SEBI) conducted investigation into the alleged irregularities in the trading in the scrip of Santowin Corporation Limited (hereinafter referred to as "**Noticee/SCL**"). There was change in 'control' of the SCL at the 26<sup>th</sup> Annual General Meeting held on August 17, 2010 wherein members designated Mr. Ashok Gupta and Mr. Ankush Gupta as new promoters of the company in place of Sandeep R Deora and Ms. Shruti S Deora. On August 30, 2010 the ex-promoters of the SCL holding 7,56,900 shares disposed of their entire shareholding and also claimed that they made the requisite disclosure to the noticee company under Regulations 13(3) and 13(4) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 (hereinafter referred to as "**PIT Regulations, 1992**"). As per Regulation 13(6) of SEBI PIT Regulations, 1992, disclosures received under Regulation 13(3) and 13(4) were required to be disclosed

by the company to the Stock exchange within two working days. However, no disclosure under Regulation 13 of PIT Regulations, 1992 was received by BSE from the noticee and it is, therefore, alleged that noticee violated the provisions of Regulation 13(6) of PIT Regulations, 1992.

2. Noticee had undertaken the following corporate actions with regard to its share capital:-

- i. issue of 18,75,000 equity shares of SCL on December 07, 2010 on account of bonus issue,
- ii. issue of 50,10,000 equity shares of SCL on December 18, 2010 on account of preferential allotment of shares,
- iii. issue of 17,28,000 equity shares of SCL on April 06, 2011 on account of preferential allotment of shares,
- iv. sub-division of equity shares of SCL on May 18, 2011 from the face value of ₹ 10 to ₹ 2 per share.

3. Details of change in the shareholding of the promoters/Directors on account of the aforesaid corporate actions is as under:

Date of txns	Name of promoter	Direct or (Y or N)	Opening Holding	Reason of increase	Increase	Closing holding	Closing holding (%)	Change in share holding (%)
30/08/10	Sushma Ashok Gupta	N	0	Physical shares received	46000	46000	3.68	3.68
01/10/10		Y	46000	-	-	46000		
07/12/10		Y	46000	Bonus 3:2	69000	115000	3.68	0
18/05/11		Y	115000	Stock Split	460000	575000	1.17	-2.51
30/08/10	Ashok Kumar Gupta	Y	0	Physical shares received	45100	45100	3.61	3.61
07/12/10		Y	45100	Bonus 3:2	67650	112750	3.61	0.00
06/04/11		Y	112750	Preferential	264000	376750	4.49	0.88

				Allotment				
18/05/11		Y	376750	Stock Split	1507000	1883750	3.82	-0.67
30/08/10	Akshat A Gupta	N	0	Physical shares received	45000	45000	3.60	3.60
07/12/10		N	45000	Bonus 3:2	67500	112500	3.60	0.00
18/05/11		N	112500	Stock Split	450000	562500	1.14	-2.46
30/08/10	Ankush A Gupta	Y	0	Physical shares received	45000	45000	3.60	3.60
07/12/10		Y	45000	Bonus 3:2	67500	112500	3.60	0.00
18/05/11		Y	112500	Stock Split	450000	562500	1.14	-2.46
18/12/10	Ashok Gupta HUF	N	0	Preferential Allotment	710000	710000	8.73	8.73
18/05/11			710000	Stock Split	2840000	3550000	7.20	-1.53

4. These corporate actions resulted in the change in the shareholding of the afore-mentioned promoters/directors and they informed that they had made requisite disclosure to the Noticee under PIT Regulations, 1992 and Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 (hereinafter referred to as "**SAST Regulations, 1997**"). Disclosures received from afore-mentioned promoters/directors were required to be disclosed by the noticee to the Stock exchange as stipulated under Regulation 13(6) of SEBI PIT Regulations, 1992 and Regulation 7(3) of SAST Regulations, 1997. However, no such disclosure under Regulation 7 of SAST Regulations, 1997 and Regulation 13 of PIT Regulations, 1992 was received by BSE from the noticee and it is, therefore, alleged that noticee did not comply with the provisions of Regulation 13(6) of PIT Regulations, 1992 and Regulation 7(3) of SAST Regulations, 1997.

5. The shareholding pattern of Noticee for the quarters ended September 2010 to September 2011 is as under:

## SHAREHOLDING PATTERN

Particular	Quarter ended Sep 2010			Quarter ended Dec 2010			Quarter ended March 2011		
	No. of shareh olders	No. Of shares	%	No. of shareh olders	No. Of shares	%	No. of sharehol ders	No. Of shares	%
Promoter Holding	4	181100	14.49	4	452750	14.49	5	1162750	14.29
Non Promoter Holding	271	1068900	85.51	283	2672250	85.51	399	6972250	85.71
Total share capital	275	1250000	100	287	3125000	100	404	8135000	100
Particular	Quarter ended June 2011			Quarter ended Sept 2011					
	No. of shareh olders	No. Of shares	%	No. of sharehold ers	No. Of shares	%			
Promoter Holding	6	7133750	14.47	5	7133750	14.47			
Non Promoter Holding	534	42181250	85.53	573	42181250	85.53			
Total share capital	540	49315000	100	578	49315000	100			

(Table Source: BSE website)

6. As per BSE website there was an issue of bonus shares by the Noticee of 3 shares for each 2 shares held which resulted in creation of 1875000 shares in total during the quarter ending on December 2010. Further, there was a preferential allotment of 50,10,000 shares made on December 18, 2010. Total shares of the Noticee increased from 3125000 in quarter ending December 2010 to 8135000 shares in quarter ending March 2011 on account of abovementioned preferential allotment. However, BSE informed that the said preferential allotment was made in December 2010 only and thus the total shareholding of the company at the end of December 2010 stands at 8135000 instead of 3125000 as disclosed by the company. It is, therefore, alleged that the noticee has violated clause 34 of Listing Agreement read with section 21 of Securities Contract (Regulation) Act, 1956 (hereinafter referred to as the '**SC(R) Act, 1956**') by making incorrect disclosure of its shareholding.

### **APPOINTMENT OF ADJUDICATING OFFICER**

7. The undersigned was appointed as Adjudicating Officer under section 15I of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as “**SEBI Act, 1992**”) read with Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalty by Adjudicating Officer) Rules, 1995 (hereinafter referred to as the ‘**Adjudication Rules**’) and under section 23I of SC(R) Act, 1956 read with Rule 3 of Securities Contracts (Regulation) Procedure Rules, 2005 (hereinafter referred to as the ‘**SCR Rules**’) to inquire and adjudge under section 15A(b) of the SEBI Act, 1992 and 23 A(a) of SC(R) Act, 1956 the aforesaid alleged violations by the Noticee.

### **SHOW CAUSE NOTICE, REPLY AND PERSONAL HEARING**

8. Show Cause Notice EAD-5/ADJ/SVKM/AA/OW/34300/2015 dated December 11, 2015 (hereinafter referred to as “**SCN**”) was issued to the Noticee under Rule 4 of the Adjudication Rules and under Rule 4 of the SCR Rules to show cause as to why an inquiry should not be initiated and penalty be not imposed under section 15A(b) of the SEBI Act, 1992 and 23 A(a) of SC(R) Act, 1956 for the alleged violations specified in the SCN against the noticee. Copies of the documents relied upon in the SCN were provided to the Noticee along with the SCN.

9. Vide letter dated January 06, 2016, Noticee stated that *“the changes in the shareholding of all noticees are due to Bonus, Stock Split and Preferential allotment. All the three actions viz. Bonus, Stock Split and Preferential allotment were done after receiving the approval of BSE. All the relevant documents were submitted to give effect to the aforementioned corporate actions. The information along with the list of allottees has been submitted to BSE.”*

10. Thereafter, Noticee was given opportunity of personal hearing on February 24, 2016 which it failed to attend. Another opportunity of personal hearing was given on March 09, 2016 and the same was attended by Shri Ashok Kumar Gupta, Managing Director of the Noticee, who requested for short adjournment on the ground of a death in his family. Matter was again posted for hearing on March 17, 2016.

11. Vide email dated March 15, 2016 Shri Ashok Kumar Gupta asked for supporting documents showing that Ashok Gupta and family acquired shares from Shruti Deora on August 30, 2010. In this regard, vide email dated March 15, 2016, noticees were supplied scanned copies of i) letter dated October 08, 2014 from RTA-Purva Share Registry (I) Pvt. Ltd., ii) Letter dated November 11, 2014 from ex-promoters of SCL and iii) Letter dated December 03, 2014 from SCL. Vide email dated March 16, 2016, noticee stated that they have found from their records that August 30, 2010 is date of transfer and not date of transaction and requested for short adjournment from personal hearing for verification of records and they were given another date for personal hearing on April 04, 2016. On the scheduled date of hearing, Shri Ashok Kumar Gupta appeared and reiterated the submissions made vide letter dated January 06, 2016 and further stated that he would be filing a brief on submissions alongwith citation by April 11, 2016. However, no submissions was filed by the noticee with respect to the charges in the SCN.

12. Considering that more than three months had lapsed since the conclusion of the hearing, Noticee was given another opportunity of making additional written submissions, if any, vide letter dated May 03, 2017. However, no additional submissions was made by the noticee.

## **CONSIDERATION OF ISSUES AND FINDINGS**

13. I have carefully perused the oral and written submissions of the Noticee and the documents available on record. The issues that arise for consideration in the present case are :

- a. Whether Noticee violated Regulation 13(6) of PIT Regulations, 1992 as regards the disposal of the shareholding by the ex-promoters?
- b. Whether Noticee violated Regulation 13(6) of PIT Regulations, 1992 and Regulation 7(3) of SAST Regulations, 1997 as regards the change in the shareholding of the promoters/Directors?
- c. Whether Noticee violated clause 34 of Listing Agreement read with section 21 of Securities Contract (Regulation) Act, 1956? and
- d. Do the violations, if any, attract monetary penalty under section 15A(b) of SEBI Act and 23 A(a) of SC(R) Act, 1956?

14. Before moving forward, it is pertinent to refer to the relevant provisions of PIT Regulations, 1992 and SAST Regulations, 1997 which reads as under:-

### **PIT Regulations, 1992**

#### **“Disclosure by company to stock exchanges.**

13. (6) Every listed company, within two working days of receipt, shall disclose to all stock exchanges on which the company is listed, the information received under sub-regulations (1), (2), (2A), (3), (4) and (4A) in the respective formats specified in Schedule III.”

### **SAST Regulations, 1997**

#### **“Acquisition of 5 per cent and more shares or voting rights of a company.**

7. (1) .....  
(2) .....

(3) Every company, whose shares are acquired in a manner referred to in sub-regulations (1) and (1A), shall disclose to all the stock exchanges on which the shares of the said company are listed the

aggregate number of shares held by each of such persons referred above within seven days of receipt of information under sub-regulations (1) and (1A).”

**Issue I – Violation of Regulation 13(6) of PIT Regulations, 1992 as regards the disposal of the shareholding by the ex-promoters**

15. Regulation 13(6) of PIT Regulations, 1992 requires listed company to make disclosure to the stock exchange within two working days about the information received under sub-regulations (1), (2), (2A), (3), (4) and (4A). The twin requirement of the aforesaid regulation is i) receipt of information and ii) disclosure of the same to the stock exchange within two working days by the listed company.

16. As regards the receipt of information, upon perusal of the documents available on record, I find that the ex-promoters of the SCL have vide letter dated November 11, 2014 (a copy of which was supplied to the Noticee vide email dated March 15, 2016) had, inter alia, stated that they have submitted all the documents under PIT Regulation to the Noticee. Further, vide letter dated December 03, 2014, Noticee had not denied the receipt of information but merely submitted that the records were maintained by CS Bharat Shah and that they would be providing the same after getting it from them. Even in the instant proceedings, Noticee has not denied the receipt of the disclosure made by the ex-promoters.

17. As regards the disclosure of the same to the stock exchange, I find that noticee had not submitted any documents showing that the disclosure under Regulation 13(6) of PIT Regulations, 1992 was made by it to the stock exchange. Further, BSE vide email dated December 29, 2014 had categorically stated that no disclosure under Regulation 13 of



PIT Regulations, 1992 was received from the noticee. This document was not disputed by the Noticee.

18. In view of the aforesaid discussion and findings, I find that the Noticee did not make disclosure to stock exchange about disposal of the shareholding by its ex-promoters on August 30, 2010 and thereby violated Regulation 13(6) of PIT Regulations, 1992.

**Issue II – Violation of Regulation 13(6) of PIT Regulations, 1992 and Regulation 7(3) of SAST Regulations, 1997 as regards the change in the shareholding of the promoters/Directors**

19. Regulation 13(6) of PIT Regulations, 1992 requires listed company to make disclosure to the stock exchange within two working days about the information received under sub-regulations (1), (2), (2A), (3), (4) and (4A). Regulation 7(3) of SAST Regulations, 1997 requires that in case the shares of listed company are acquired in manner referred to in sub-regulations (1) and (1A), then such company is required to make disclosure about the aggregate number of shares held by such persons to the stock exchange within seven days receipt of information from such persons under sub-regulations (1) and (1A).

20. Details of corporate actions and the resultant change in the shareholding of the promoters/Directors have been mentioned at para 2 and 3 respectively. Upon perusal of the documents available on record, I find that the Noticee had not denied the receipt of information but merely stated that the changes in the shareholding were due to Bonus, Stock Split and Preferential allotment and that the information along with the list of allottees has been submitted to BSE. However, noticee has not submitted any documents substantiating its claim that the requisites disclosures have been made to BSE. Further, BSE vide email dated

December 29, 2014 had categorically stated that no disclosure under Regulation 7 of SAST Regulations, 1997 and Regulation 13 of PIT Regulations, 1992 was received from the noticee. A copy of the said email was furnished to the Noticee which did not dispute the same.

21. In view of the aforesaid discussion and findings, I hold that the noticee failed to make requisite disclosure under Regulation 13(6) of PIT Regulations, 1992 and Regulation 7 of SAST Regulations, 1997 as regards the change in the shareholding of promoters/Directors pursuant to various corporate action.

**Issue III – Violation of clause 34 of Listing Agreement read with section 21 of SC(R) Act, 1956**

22. Here I note that the allegation against the noticee is that it had made a preferential allotment of 50,10,000 shares on December 18, 2010, which was not disclosed in the quarter ending December 2010. The change reflecting such change in the share capital of the noticee was disclosed only in the quarter ending March 2011. Therefore, it was alleged that the noticee has violated clause 34 of Listing Agreement read with section 21 of SC(R) Act, 1956. The said provisions are as under:

**Listing Agreement**

Clause 34. The Company agrees - - -

- (a) that it will not exercise a lien on its fully paid shares and that in respect of partly paid shares it will not exercise any lien except in respect of moneys called or payable at a fixed time in respect of such shares;*
- (b) that it will not decline to register or acknowledge any transfer of shares on the ground of the transferor being either alone or jointly with any other person or persons indebted to the Company on any account whatsoever;*
- (c) that it will not forfeit unclaimed dividends before the claim becomes barred by law and that such forfeiture, when effected, will be annulled in appropriate cases;*

- (d) *that if any amount be paid up in advance of calls on any shares it will stipulate that such amount may carry interest but shall not in respect thereof confer a right to dividend or to participate in profits;*
- (e) *that it will not give to any person the call of any shares without the sanction of the shareholders in general meeting;*
- (f) *that it will send out proxy forms to shareholders and debenture holders in all cases, such proxy forms being so worded that a shareholder or debenture holder may vote either for or against each resolution;*
- (g) *that when notice is given to its shareholders by advertisement it will advertise such notice in at least one leading Mumbai daily newspaper.*

### **SC(R) Act, 1956**

#### ***Conditions for listing.***

**21.** *Where securities are listed on the application of any person in any recognised stock exchange, such person shall comply with the conditions of the listing agreement with that stock exchange.*

23. As regards the violation of clause 34 of Listing Agreement is concerned, I note that the said clause is inapplicable in the facts of the case. In my view, the appropriate clause should have been Clause 36(7)(i) of the Listing Agreement which requires listed company to immediately inform the Exchange of all the events, which will have bearing on the performance/operations of the company as well as price sensitive information and one such event is issue of any class of securities.

24. Now the next question is whether mentioning of wrong charging provision is fatal to the proceedings as far as the violation by the noticee is concerned and whether the same resulted in any prejudice to the noticee. In this connection, I would like to refer to the order of Hon'ble High Court of Bombay in the matter of *SEBI vs. Sangeeta Jayesh Valia* (Appeal no. 2 of 2004 order dated December 05, 2003) wherein it was observed that *"It is well settled that if the power to act in the authority*

*exists in a fact situation, such exercise of power is not vitiated by the reference to wrong provision of law. Mention of wrong provision of law shall not render the exercise of power by the authority bad in law if the source of power can be traced in some other provision."*

25. Further, Hon'ble SAT also in the matter of *Canbank Investment Management Services Ltd. vs SEBI* (Appeal no. 34/2000 dated March 30, 2001) had held that "*The legal position in such a situation has been well explained by the Supreme Court in several cases. The court had held that even the mention of a wrong provision or the omission to mention the provision which contains the source of power will not invalidate an order where the source of such power exists. In the instants case source of power exists under 15E and the Adjudicating Officer has rightly exercised that power.*"

26. Reliance is also placed on *Union of India and Another v/s Tulsi Ram Patel & Ors.* {(1985) 3 SCC 398} wherein it was held (para 126)".... if source of power exists by reading together two provisions, whether statutory or constitutional, and the order refers to only one of them, the validity of the order should be upheld by construing it as an order passed under both those provisions. Further, even the mention of a wrong provision or the omission to mention the provision which contains the source of power will not invalidate an order where the source of such power exists."

27. In view of the aforesaid judgments, I am of the view that mere mentioning of wrong provision is not fatal to the proceedings so long as the nature of the misconduct is conveyed in the SCN. The noticee clearly understood it to be a charge of not informing stock exchange about issue

of preferential allotment and replied accordingly stating that stock exchange was informed about preferential allotment. However, it could not dispute the e-mail of BSE stating otherwise. Further, it is bound by section 21 of SC(R) Act, 1956 referred above. With regard to non-disclosure to Stock Exchange for the changes in the capital structure subsequent to preferential allotment, the explanation of the noticee is not found satisfactory in view of the provision of Clause 36(7)(i) of the Listing Agreement as discussed at para 25.

28. As per Board Resolution of the Noticee dated December 18, 2010 (Annexure IV of the SCN) the preferential allotment of 50,10,000 equity shares at a price of ₹30/- each was made to 29 allottees. Further, Noticee vide letter dated February 08, 2011 to BSE (Annexure V of the SCN) has also confirmed that it has allotted 50,10,000 equity shares. BSE also vide email dated December 03, 2014 (Annexure V of the SCN) stated that as per their records the date of allotment of these shares is December 18, 2010. Hence, there was change in the capital structure of the noticee on December 18, 2010 due to preferential allotment of 50,10,000 equity shares which has not been disclosed by the noticee to the stock exchange.

29. The shareholding pattern of the noticee as available on the BSE website for the quarters ended September 2010 to September 2011 as mentioned at para 5 above also shows that capital structure of the noticee has not taken into account the preferential allotment of 50,10,000 equity shares in its quarterly shareholding for December 2010. The resultant change in the capital structure due to said preferential allotment has been incorporated only in the quarter ended March 2011. That being the case, I find that the noticee has not complied with the listing

conditions regarding issue of further shares in preferential allotment and thereby violated section 21 of SC(R) Act, 1956.

**Issue II - Does the violation, if any, attract monetary penalty under section 15A (b) of SEBI Act and 23 A(a) of SC(R) Act, 1956?**

30. By not making the disclosures on time, Noticee failed to comply with their mandatory statutory obligation. In this context, reliance is placed upon the order of the Hon'ble Supreme Court of India in the matter of *Chairman, SEBI vs. Shriram Mutual Fund* {[2006] 5 SCC 361} wherein it was held that *"In our view, the penalty is attracted as soon as contravention of the statutory obligations as contemplated by the Act is established and, therefore, the intention of the parties committing such violation becomes immaterial. .... Hence, we are of the view that once the contravention is established, then the penalty has to follow and only the quantum of penalty is discretionary."*

31. As the violation of Regulation 13(6) of PIT Regulations, 1992 and Section 21 of SC(R) Act, 1956 by Noticee is established, the Noticee is liable for monetary penalty under section 15A(b) of SEBI Act, 1992 and Section 23A(a) of SC(R) Act, 1956 which, at the time of violation, read as under:

**SEBI Act, 1992**

***"15A. Penalty for failure to furnish information, return, etc.- If any person, who is required under this Act or any rules or regulations made thereunder,-***

***(a) .....***;

***(b) to file any return or furnish any information, books or other documents within the time specified therefor in the regulations, fails to file return or furnish the same within the time specified therefor in the regulations, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;"***

**SC(R ) Act, 1956**

***Penalty for failure to furnish information, return, etc.***

**23A.** *Any person, who is required under this Act or any rules made there under,—*

*(a) to furnish any information, document, books, returns or report to a recognized stock exchange, fails to furnish the same within the time specified therefore in the listing agreement or conditions or bye-laws of the recognised stock exchange, shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less for each such failure;*

32. While determining the quantum of penalty under section of SEBI Act, 1992 and Section 23A(a) of SC(R) Act, 1956, it is important to consider the following factors stipulated in section 15J of SEBI Act, 1992 and Section 23J of SC(R) Act, 1956:-

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

33. The amount of disproportionate gain or unfair advantage to the Noticee or loss caused to the investors as a result of the default is not quantified as per the material available on record. Though it may not be possible to ascertain the monetary loss to the investors on account of default by the Noticee, the details of the shareholding of the promoters/directors and changes thereto and immediate disclosure to the investors about issuance of equity shares due to preferential allotment is an essential part of the proper functioning of the securities market and timely disclosure thereof to the stock exchanges etc. are of significant importance from the standpoint of investors. The purpose of these disclosures is to bring about transparency in the transactions and assist the Regulator to effectively monitor the transactions in the market. Hon'ble SAT in the case of *M/s. Coimbatore Flavors & Fragrances Ltd. &*

Ors vs SEBI (Appeal No. 209 of 2014 order dated August 11, 2014), observed *"Undoubtedly, the purpose of these disclosures is to bring about more transparency in the affairs of the companies. True and timely disclosures by a company or its promoters are very essential from two angles. Firstly; investors can take a more informed decision to invest or not to invest in a particular scrip secondly; the Regulator can properly monitor the transactions in the capital market to effectively regulate the same."* Further, since there is failure on various occasions on the part of the noticee to make disclosure to the exchange, the same has to be considered as repetitive.

#### **ORDER**

34. After taking into consideration the nature and gravity of charges established, the facts and circumstances of the case and the mitigating factors, I, in exercise of the powers conferred upon me under Section 15(2) of the SEBI Act, 1992 read with Rule 5 of the Adjudication Rules, hereby impose following penalty on the Noticee under section 15A(b) of SEBI Act, 1992 and Section 23A(a) of SC(R) Act, 1956 :

<b>Violation</b>	<b>Penalty Amount</b>
Regulation 13(6) of PIT Regulations, 1992	₹ 4,00,000/- (Rupees Four Lakh Only)
Regulation 7(3) of SAST Regulations, 1997	₹ 2,00,000/- (Rupees Two Lakh Only)
Section 21 of SC(R) Act, 1956	₹ 5,00,000/- (Rupees Five Lakh Only)
<b>Total</b>	<b>₹ 11,00,000/- (Rupees Eleven Lakh Only)</b>

35. The amount of penalty shall be paid either by way of demand draft in favour of "SEBI - Penalties Remittable to Government of India", payable at Mumbai, **or** by e-payment in the account of "SEBI - Penalties Remittable to Government of India", A/c No. 31465271959, State Bank of



India, Bandra Kurla Complex Branch, RTGS Code SBIN0004380 within 45 days of receipt of this order. The said demand draft or forwarding details and confirmations of e-payments made (in the format as given in table below) should be forwarded to “The Chief General Manager, Enforcement Department, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C – 4 A, “G” Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051.”

1. Case Name :	
2. Name of Payee :	
3. Date of Payment:	
4. Amount Paid :	
5. Transaction No. :	
6. Bank Details in which payments is made :	
7. Payment is made for : (like penalties/ disgorgement/ recovery/ settlement amount and legal charges along with order details)	

36. In terms of rule 6 of Adjudication Rules and SCR Rule, copy of this order is sent to Noticee and also to the Securities and Exchange Board of India.

**Date: June 30, 2017**  
**Place: Mumbai**

**S. V. Krishnamohan**  
**Chief General Manager &**  
**Adjudicating Officer**