

**BEFORE THE ADJUDICATING OFFICER  
SECURITIES AND EXCHANGE BOARD OF INDIA  
SUMMARY SETTLEMENT ORDER**

(On Settlement application nos. 3823/2018, 3841/2019 and 3842/2019)

***Names of applicants:* Mr. Palem Srikanth Reddy, Ms. P. Soujanya Reddy, Mr Suresh Rajpal, Mr. D Vidyasagar, Mr. Boon Hwee Koh, Mr. Mahendran Ramanathan, Mr. Teo Ser Luck, Mr. Keen Whye Lee, Mr. Douglas Terene Ash, M/s. West River Investments Limited, M/s Six Rivers Group Limited, Mr. Venkateswar Rao, Mr. Deborah Lee Siew Yin, Mr. David Ian Beatson, M/s Satver Inc. and M/s ECR Consultants Limited.**

**In the matter of M/sPalred Technologies Limited**

**Settlement Order No: SM/EAD-9/ 252-267 /2018-19**

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1. Securities and Exchange Board of India (hereinafter referred to as “**SEBI**”), while examining the draft letter of offer filed by Merchant Banker on behalf of Mr. Palem Srikanth Reddy (Acquirer) along with Ms. Stuthi Reddy (Persons acting in concert) to acquire 26% equity shares of M/s Palred Technologies Ltd (“Target Company”), SEBI observed default in making disclosures as required under Regulation 7(1A) of the SEBI (Substantial Acquisition of Shares and Takeover Regulations), 1997 (hereinafter referred to as “**SAST Regulations**”) by the Promoters and persons acting in concert namely Mr. Palem Srikanth Reddy, Ms. P. Soujanya Reddy, Mr Suresh Rajpal, Mr. D Vidyasagar, Mr. Boon Hwee Koh, Mr. Mahendran Ramanathan, Mr. Teo Ser Luck, Mr. Keen Whye Lee, Mr. Douglas Terene Ash, M/s. West River Investments Limited, M/s Six Rivers Group Limited, Mr. Venkateswar Rao, Mr. Deborah Lee Siew Yin, Mr. David Ian Beatson, M/s Satver Inc. and M/s ECR Consultants Limited (hereinafter referred to as “applicants”).
2. The undersigned was appointed as the Adjudicating Officer vide communique order dated April 18, 2018. Thereafter, Show Cause Notice dated August 08, 2018 for certain entities and November 30, 2018 for remaining entities were issued wherein it was observed there was change in the shareholding of the promoters/person acting in concert of the target company during the quarter ended April –June 2005 and July-September 2005 and the applicants failed to make the requisite disclosures under Regulation 7 (1A) of SAST Regulations. Therefore, it was alleged that the applicants have violated Regulation 7(1A) of SAST Regulations.
3. While the adjudication proceedings were in progress, the applicants filed settlement

applications through Mr. Palem Srikanth Reddy in terms of the SEBI (Settlement of Administrative and Civil Proceedings) Regulations, 2014.

4. The applicants were called for a meeting with the Internal Committee (hereinafter referred to as “**IC**”) of SEBI on February 26, 2019 and were given an option of either preferring summary settlement procedure by paying the settlement amount of Rs.13,19,625/- (Rupees Thirteen Lakh Nineteen Thousand Six Hundred Twenty Five only) or adopting normal settlement procedure.
5. The applicants preferred to go for the summary settlement procedure and accordingly, a notice of summary settlement dated February 26, 2019, was issued to the applicants mentioning therein that the aforesaid default may be settled and disposed of upon remittance of settlement amount of Rs. 13,19,625/- (Rupees Thirteen Lakh Nineteen Thousand Six Hundred Twenty Five only), amount arrived at in terms of the SEBI (Settlement Proceedings) Regulations, 2018, within 10 calendar days from the date of receipt of the notice.
6. In response, vide letter dated March 05, 2019, Mr. Palem Srikanth Reddy and on behalf of the other applicants remitted on March 05, 2019. Rs. 13,19,625/- (Rupees Thirteen Lakh Nineteen Thousand Six Hundred Twenty Five only) vide electronic transfer no. KKBKR52019030500718039 to SEBI.
7. In view of the above, in terms of Regulation 15(1) of the Settlement Regulations, 2014, read with Regulations 23(1) and 34 of the SEBI (Settlement Proceedings) Regulations, 2018, it is hereby ordered that this summary settlement order disposes of the aforesaid adjudication proceeding initiated against the applicants namely, Mr. Palem Srikanth Reddy, Ms. P. Soujanya Reddy, Mr Suresh Rajpal, Mr. D Vidyasagar, Mr. Boon Hwee Koh, Mr. Mahendran Ramanathan, Mr. Teo Ser Luck, Mr. Keen Whye Lee, Mr. Douglas Terene Ash, M/s. West River Investments Limited, M/s Six Rivers Group Limited, Mr. Venkateswar Rao, Mr. Deborah Lee Siew Yin, Mr. David Ian Beatson, M/s Satver Inc. and M/s ECR Consultants Limited. vide show cause notices dated August 08, 2018 and November 30, 2018 for the violation of Regulation 7(1A) of SAST Regulations.
8. This order is without prejudice to the right of SEBI to take enforcement actions including restoring or initiating the proceedings in respect to which the settlement order was passed against the applicants, if:

- a. any representations made by the applicants in the settlement proceedings is subsequently found to be untrue; or
  - b. the applicants breaches any of the clauses/ conditions of undertakings/ waivers filed during the current settlement proceedings.
9. This settlement order is passed on the **18<sup>th</sup> day of March 2019** and shall come into force with immediate effect.
10. In terms of Regulation 17 of the Settlement Regulations, 2014, read with Regulation 25 of SEBI (Settlement Proceedings) Regulations, 2018, copy of this order are being sent to the applicants and shall also to the Securities and Exchange Board of India..

**Place: Mumbai**  
**Date: March 18, 2019**

**SAHIL MALIK**  
**ADJUDICATING OFFICER**