

**BEFORE THE ADJUDICATING OFFICER
SECURITIES AND EXCHANGE BOARD OF INDIA
SETTLEMENT ORDER NO. PM/RR/10/2018-19**

SETTLEMENT ORDER

**On the Application No. 3343 of 2017 submitted by Alexander Stamps and Coin
Limited (formerly known as Rudraksh Cap Tech Limited)**

1. Securities and Exchange Board of India (hereinafter referred to as '**SEBI**'), has initiated adjudication proceedings against Alexander Stamps and Coin Ltd. (hereinafter referred to as 'Applicant/Noticee') vide Order dated May 16, 2017 under Section 15-I read with Section 19 of Securities and Exchange Board of India Act, 1992 (hereinafter referred to as 'SEBI Act') for alleged violation of provisions of Regulation 12(1) read with Clause 1.2 of Schedule 1, Part A of SEBI (Prevention of Insider Trading) Regulations, 1992 (hereinafter referred to as "PIT Regulations, 1992") read with Regulation 12 of SEBI (Prevention of Insider Trading) Regulations, 2015 (hereinafter referred to as "PIT Regulations, 2015").
2. The undersigned has been appointed as Adjudicating Officer, vide Order dated May 16, 2017 (communicated to the Adjudicating Officer vide communique dated June 7, 2017) under Section 15-I of SEBI Act read with Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 (hereinafter referred to as 'Adjudication Rules') to inquire into and adjudge under the provisions of Sections 15HB of the SEBI Act for the aforesaid alleged violations.
3. Show Cause Notice no. SEBI/EAD/PM/RR/14978/2017 dated June 30, 2017 (hereinafter referred to as 'SCN') was issued to the Noticee. It was

alleged that the Noticee had violated aforesaid provisions of PIT Regulations, 1992 and PIT Regulations, 2015.

4. While the adjudication proceedings were initiated, the Noticee submitted Application for settlement of the proceedings, in terms of SEBI (Settlement of Administrative and Civil Proceedings) Regulations, 2014 (hereinafter referred to as '**Settlement Regulations**').
5. Thereafter, the Noticee had a meeting with the Internal Committee (IC) of SEBI on May 11, 2018.
6. The settlement terms as proposed by the Noticee was considered by the Internal Committee and placed before the High Powered Advisory Committee (hereinafter referred to as '**HPAC**') on July 16, 2018. After considering the facts and circumstances of the case, the HPAC recommended that the case may be settled by the Noticee on payment of Rs 6,80,000/-, which was subsequently approved by the panel of Whole Time Members of SEBI.
7. Accordingly, the Noticee has remitted consolidated settlement amount of Rs 6,80,000/- (Rupees Six Lakh Eighty Thousand Only) vide Demand Draft bearing No. 501902 dated October 1, 2018 drawn on ICICI Bank favoring SEBI towards the terms of settlement in the matter.
8. Now, therefore, in view of the acceptance of the settlement terms as proposed by the Noticee and receipt of Demand Draft as above by SEBI, the pending adjudication proceedings initiated against the Noticee vide Order dated May 16, 2017 is disposed of in terms of Regulation 15(1) of SEBI Settlement Regulations, 2014.

9. This order is without prejudice to the right of SEBI to take enforcement actions including commencing / re-opening of the pending proceedings against the Noticee, if SEBI finds that:
- a. any representation made by the Noticee in the settlement proceedings are subsequently discovered to be untrue.
 - b. the Noticee has breached any of the clauses / conditions of undertakings / waivers filed during the current settlement proceedings.
10. This settlement order passed on this 16th day of October, 2018 shall come into force with immediate effect.
11. In terms of Regulation 17 of the Settlement Regulations, 2014 a copy of this order is being sent to the Applicant / Noticee and for publication on the website of Securities and Exchange Board of India.

Date: October 16, 2018
Place: MUMBAI

PRASANTA MAHAPATRA
ADJUDICATING OFFICER