



**SECURITIES AND EXCHANGE BOARD OF INDIA**  
**EX-PARTE INTERIM ORDER CUM SHOW CAUSE NOTICE**

**UNDER SUB-SECTION (1) OF SECTION 11, SUB-SECTION (4) OF SECTION 11, SUB-SECTION (4A) OF SECTION 11 AND SECTION 11B OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992 READ WITH REGULATION 11 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF FRAUDULENT AND UNFAIR TRADE PRACTICES RELATING TO SECURITIES MARKET) REGULATIONS, 2003**

**IN THE MATTER OF STOCK RECOMMENDATIONS GIVEN BY SANJIV BHASIN IN MEDIA CHANNELS AND OTHER SOCIAL MEDIA PLATFORMS**

In respect of:

| Sr. No.                                                                | Names of <i>Noticees</i>            | PAN        |
|------------------------------------------------------------------------|-------------------------------------|------------|
| <b>Guest Expert</b>                                                    |                                     |            |
| 1.                                                                     | Sanjiv Bhasin                       | AAXPB9978P |
| <b>Enablers (who may also be beneficiary/profit maker)</b>             |                                     |            |
| 2.                                                                     | Lalit Bhasin                        | AFDPB2550A |
| 3.                                                                     | Ashish Kapur                        | AJPPK9522R |
| 4.                                                                     | RRB Master Securities Delhi Limited | AACCR3227P |
| <b>Information Misusers (who may also be beneficiary/profit maker)</b> |                                     |            |
| 5.                                                                     | Rajiv Kapoor                        | ARSPK9663Q |
| 6.                                                                     | Jagat Singh                         | BSRPS9870C |
| 7.                                                                     | Praveen Gupta                       | AAEPG1976F |
| <b>Profit Makers</b>                                                   |                                     |            |
| 8.                                                                     | Venus Portfolios Private Limited    | AAACV4306R |
| 9.                                                                     | Gemini Portfolios Private Limited   | AAACG4847Q |
| 10.                                                                    | HB Stockholdings Limited            | AAACH0637F |
| 11.                                                                    | Leo Portfolios Private Limited      | AAACL2384F |
| 12.                                                                    | Babita Gupta                        | AAEPG1745N |

*(The entities mentioned above are individually referred to by their respective names or Noticee No. and collectively referred to as “**Noticees**”, unless the context specifies otherwise)<sup>1</sup>*

<sup>1</sup> Some names who are not Noticees are anonymised and actual name would be supplied to Noticees during inspection and to Hon’ble Securities Appellate Tribunal and Courts, during court proceedings.



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## A. BACKGROUND

1. The present proceedings emanate from an investigation conducted by the Securities and Exchange Board of India (hereinafter referred to as “**SEBI**”), for the period from January 01, 2020 to June 12, 2024 (hereinafter referred to as “**Relevant Period/Investigation Period/IP**”), *inter alia*, to examine and ascertain whether there has been any violation of the provisions of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as “**SEBI Act, 1992**”), SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (hereinafter referred to as “**PFUTP Regulations**”), and SEBI (Research Analysts) Regulations, 2014 (hereinafter referred to as “**RA Regulations**”) by *Noticees*.
2. SEBI received three complaints dated (i) September 14, 2023, (ii) September 29, 2023 and (iii) October 11, 2023, wherein, it was, *inter alia*, alleged that certain entities have been indulged in stock manipulations, as detailed below:
  - 2.1 Sanjiv Bhasin (hereinafter referred to as “**Noticee No. 1**”), a director at IIFL Securities Limited, traded through a broker viz. RRB Master Securities Delhi Limited (hereinafter referred to as “**Noticee No. 4/RRB Master**”) wherein he used to first buy securities himself, then used to recommend the same securities to the public on news channels like “Zee Business” and “ET Now”, and/or IIFL Telegram Channel, to buy the same securities.
  - 2.2 Once prices of securities increased after his recommendations, Sanjiv Bhasin used to sell the securities, thereby making a profit. Accordingly, Sanjiv Bhasin manipulated the price of securities and made ill-gotten gains.
3. Based on complaints received, a preliminary analysis was undertaken to examine the trading activities of the suspected entities. Thereafter, an Investigating Authority was appointed by SEBI, in terms of Section 11C of the SEBI Act, to carry out further investigation in the matter. Subsequently, in order to gather more information and evidence, after obtaining necessary order from the Competent Court, search & seizure operations were carried out at various locations of 7 entities including the *Noticees* herein, on June 13-14, 2024.



During the said operation, data was obtained from various electronic devices and statements of the entities were recorded under oath. A search & seizure operation was conducted at the premises of the following entities.

Table 1

| SR. NO.                                               | NAME/DESCRIPTION                                            | LOCATION                                                                                                                                                                                                           |
|-------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Entities who are <i>Noticees</i> in this Order</b> |                                                             |                                                                                                                                                                                                                    |
| 1.                                                    | Sanjiv Bhasin<br>( <i>Noticee</i> No. 1)                    | <b>Residence:</b> H. No. B-174A, Sushant Lok-I, Block-B, Gurugram, Haryana- 122001; and<br>Sanjiv Bhasin Cabin, 1 <sup>st</sup> Floor, Plot No. 98, Phase-IV, Udyog Vihar, Atlas Chowk, Gurugram, Haryana- 122015. |
| 2.                                                    | Ashish Kapur ( <i>Noticee</i> No. 3)                        | <b>Residence:</b> House No. M-48, Grater Kailash Part 1, Greater Kailash, South Delhi, New Delhi- 110048.                                                                                                          |
| 3.                                                    | RRB Master Securities Delhi Limited ( <i>Noticee</i> No. 4) | <b>Office:</b> H-72, Connaught Place, New Delhi- 110001.                                                                                                                                                           |
| 4.                                                    | Rajiv Kapoor ( <i>Noticee</i> No. 5)                        | <b>Residence:</b> J7/47, 2 <sup>nd</sup> Floor, Rajouri Garden, West Delhi- 110027.                                                                                                                                |
| 5.                                                    | Jagat Singh ( <i>Noticee</i> No. 6)                         | <b>Residence:</b> 901, Tower 7, Sunshine County, Sonipat, Haryana- 131023.                                                                                                                                         |

4. Further, data from electronic devices pertaining to Lalit Bhasin was also obtained during the said operation. Apart from above entities, search & seizure order was also issued by Competent Court against an entity, who is not a *Noticee* in the instant Order, however, on the day of search & seizure, the entity was neither found at the residential location nor at the official location and hence the search warrant could not be executed. Nothing adverse has also been found against this entity at this stage.

#### **B. DETAILS OF *NOTICEES* INVOLVED IN THE MATTER**

Based on findings of investigation, details of *Noticees* involved in the matter are elaborated as under:



## 5. Guest Expert

5.1 Sanjiv Bhasin (**Noticee No. 1**) was employed with IIFL Securities Limited (**hereinafter referred to as 'IIFL'**), in various capacities since 2015, details of which are provided in Table 2 below. IIFL is a SEBI registered Research Analyst (Registration No. INH000000248). During the IP, the *Noticee No. 1* was employed with IIFL from April 01, 2017 to November 30, 2022 as 'Director' of IIFL. Subsequently, from December 01, 2022 to June 17, 2024, Sanjiv Bhasin was once again associated with IIFL as a consultant wherein, he used to give trading/investment views on stocks, which used to be circulated/broadcasted to all clients of IIFL.

Table 2

| SR. NO. | PERIOD                              | NATURE OF ASSOCIATION |
|---------|-------------------------------------|-----------------------|
| 1.      | May 11, 2015 to March 31, 2017      | Consultant with IIFL  |
| 2.      | April 01, 2017 to November 30, 2022 | Director of IIFL      |
| 3.      | December 01, 2022 – June 17, 2024   | Consultant with IIFL  |

5.2 At IIFL, Sanjiv Bhasin's role *inter alia* included preparing morning note (at IIFL, it is referred as '**Market Mantra**') on securities market, providing trading views/giving research calls, conducting investor awareness programs across India on behalf of IIFL. The *Noticee No. 1* also carried out stock specific research at IIFL and used to give trading/investment views on stocks, which used to be circulated/broadcasted to all clients of IIFL.

5.3 As a guest expert, the *Noticee No. 1* appeared on various business TV shows such as '*CNBC Awaaz*', '*CNBC English*' '*ET Now*', '*ET Now Swadesh*' and '*Zee Business*' (**hereinafter collectively referred to as "Media Channels"**) and used to give his opinion about securities market in general as well as specific recommendations about listed companies along with buy /sell recommendations (mostly buy), citing reasons along with buy/sell price range, short-term/long term and target range. During his appearances on Media Channels, the designation of Sanjiv Bhasin was



shown as '**Director, IIFL**'. Investigation revealed that Sanjiv Bhasin had traded through trading member RRB Master Securities Delhi Limited (**Noticee No. 4**), in the accounts of its clients viz. Venus Portfolios Private Limited (**Venus/Noticee No. 8**), Gemini Portfolios Private Limited (**Gemini/Noticee No. 9**) and HB Stock Holdings Limited (**HB/Noticee No. 10**) contrary to his recommendations made in Media Channels during the investigation period.

**5.4** Investigation revealed that the Times group signed an exclusive contract with the *Noticee No. 1* for his appearances on TV channels run by the Times Group viz. "**ET Now**" and "**ET Now Swadesh**" from October 2023 onwards. The *Noticee No. 1* was given this contract on the basis of his experience with IIFL and his popularity among the retail investors (both Hindi and English Channel followers).

**5.5** As discussed earlier, IIFL is registered with SEBI as a Research Analyst (hereinafter referred to as "**RA**") and Investment Advisor (hereinafter referred to as "**IA**"), however, the *Noticee No. 1* was not registered with SEBI either as an IA or as an RA, in his personal capacity. Investigation revealed that the *Noticee No. 1* was popular on social media platforms as per the details of the followers/subscribers of his various social media channels:

Table 3

| SR. NO. | SOCIAL MEDIA PLATFORM                    | FOLLOWER/SUBSCRIBERS AS ON MARCH 26, 2025 |
|---------|------------------------------------------|-------------------------------------------|
| 1.      | X (formerly Twitter)                     | 3,21,000 Followers                        |
| 2.      | You Tube channel (Wealth Creation India) | 4,12,000 Subscribers                      |
| 3.      | LinkedIn                                 | 21,000 Followers                          |

## **6. Enablers (who may be beneficiary/profit maker)**

**6.1** RRB Master Securities Delhi Private Limited (**RRB Master/Noticee No. 4**) (CIN No. U74899DL1993PLC055382) is an unlisted company and a Trading Member registered with SEBI having its registered address at "*H-72, Connaught Circus New Delhi -110001, India*". The *Noticee No. 4* also



has a branch office located at “A-2,3,4, Third Floor, HB Twin Tower, Netaji Subhash Place, Pitampura, New Delhi, 110034”. Ashish Kapur (**Noticee No. 3**) was the Managing Director of the *Noticee No. 4* and also brother in law of Lalit Bhasin/*Noticee No. 2*, who looked after day to day operations of RRB Master. Mamta Kapur, wife of the *Noticee No. 3* and sister of the *Noticee No. 2*, was also a Director/Promoter of RRB Master, having 82.27% shareholding. Mamta Kapur, Lalit Bhasin and Ashish Kapur collectively held 85.71% of the shareholding of RRB Master.

**6.2** Ashish Kapur (**Noticee No. 3**), Rajiv Kapoor (hereinafter referred to as “**Noticee No. 5**”), Jagat Singh (hereinafter referred to as “**Noticee No. 6**”), Mr\*\*\*\*\* (hereinafter referred to as “**Dealer 1**”) and Mr.\*\*\*\*\* (hereinafter referred to as “**Dealer 2**”) were dealers of RRB Master. The details of directors/promoters of the *Noticee No. 4* are tabulated below.

Table 4

| S.R. NO | NAME                                                         | DESIGNATION                  | % SHAREHOLDING AS ON MARCH 31, 2023 |
|---------|--------------------------------------------------------------|------------------------------|-------------------------------------|
| 1       | Ashish Kapur (brother in law of Lalit Bhasin)                | Managing Director (Promoter) | 0.01                                |
| 2       | Mamta Kapur (w/o of Ashish Kapur and sister of Lalit Bhasin) | Director (Promoter)          | 82.27                               |
| 3       | Lalit Bhasin                                                 | Director (Promoter)          | 3.43                                |

**6.3** Total number of Clients of the *Noticee No. 4* during the Investigation Period is as under:

Table 5

| FINANCIAL YEAR | TOTAL NO. OF ACTIVE CLIENTS |
|----------------|-----------------------------|
| 2020-21        | 126                         |
| 2021-22        | 119                         |
| 2022-23        | 121                         |
| 2023-24        | 107                         |

**6.4** Major clients of the *Noticee No. 4*, in terms of turnover percentage (Buy + Sell) are as under:



Table 6

| YEAR                                                          | TOTAL<br>TURNOV<br>ER (₹IN<br>CRS.)<br>(CASH &<br>F&O) | RANK | ENTITY NAME                                                      | TURNOVER<br>(₹IN CRS.) | % OF TOTAL<br>TURNOVER |
|---------------------------------------------------------------|--------------------------------------------------------|------|------------------------------------------------------------------|------------------------|------------------------|
| F.Y<br>2020-<br>2021                                          | 3,511.94                                               | 1    | Venus Portfolios Pvt Ltd                                         | 1,445.22               | 41.15%                 |
|                                                               |                                                        | 2    | Leo Portfolios Private Limited                                   | 445.58                 | 12.69%                 |
|                                                               |                                                        | 3    | Gemini Portfolios Private Limited                                | 324.89                 | 9.25%                  |
|                                                               |                                                        | 4    | Ashish Kapur                                                     | 307.28                 | 8.75%                  |
|                                                               |                                                        | 5    | HB Stockholdings Limited                                         | 215.73                 | 6.14%                  |
|                                                               |                                                        |      | <b>Total for F.Y. 2020-2021</b>                                  | <b>2,738.70</b>        | <b>77.98%</b>          |
| F.Y<br>2021-<br>2022                                          | 3,531.18                                               | 1    | Venus Portfolios Pvt Ltd                                         | 1,778.37               | 50.36%                 |
|                                                               |                                                        | 2    | HB Stockholdings Limited                                         | 716.81                 | 20.30%                 |
|                                                               |                                                        | 3    | Leo Portfolios Private Limited                                   | 290.84                 | 8.24%                  |
|                                                               |                                                        | 4    | Ashish Kapur                                                     | 165.75                 | 4.69%                  |
|                                                               |                                                        | 5    | Gemini Portfolios Private Limited                                | 101.41                 | 2.87%                  |
|                                                               |                                                        |      | <b>Total for F.Y. 2021-2022</b>                                  | <b>3,053.17</b>        | <b>86.46%</b>          |
| F.Y<br>2022-<br>2023                                          | 5,272.60                                               | 1    | Venus Portfolios Pvt Ltd                                         | 2,719.80               | 51.58%                 |
|                                                               |                                                        | 2    | HB Stockholdings Limited                                         | 1,502.67               | 28.50%                 |
|                                                               |                                                        | 3    | Mars Forge Private Limited                                       | 170.09                 | 3.23%                  |
|                                                               |                                                        | 4    | Gemini Portfolios Private Limited                                | 120.27                 | 2.28%                  |
|                                                               |                                                        | 5    | Leo Portfolios Private Limited                                   | 110.80                 | 2.10%                  |
|                                                               |                                                        |      | <b>Total for F.Y. 2022-2023</b>                                  | <b>4,623.64</b>        | <b>87.69%</b>          |
| F.Y<br>2023-<br>2024<br>& Qtr.<br>I of<br>F.Y.<br>2024-<br>25 | 4,877.33                                               | 1    | Venus Portfolios Pvt Ltd                                         | 2,567.61               | 52.64%                 |
|                                                               |                                                        | 2    | HB Stockholdings Limited                                         | 1,634.19               | 33.51%                 |
|                                                               |                                                        | 3    | RRB Securities Ltd                                               | 167.53                 | 3.43%                  |
|                                                               |                                                        | 4    | Rima Arora                                                       | 132.21                 | 2.71%                  |
|                                                               |                                                        | 5    | HB Portfolio Limited                                             | 90.43                  | 1.85%                  |
|                                                               |                                                        |      | <b>Total for F.Y 2023-2024<br/>&amp; Qtr. I of F.Y 2024-2025</b> | <b>4,591.96</b>        | <b>94.15%</b>          |

6.5 On a perusal of the data in the above table, it is seen that even though the Noticee No. 4 had more than 100 clients in various Financial Years between 2020-2024, nearly 75% and above of the total turnover in the respective financial years had been generated from those clients of RRB Master, who were related/connected to directors/promoters of RRB Master, as shown in the succeeding paragraphs. During the investigation, it was revealed that





Ashish Kapur being the MD of the *Noticee No. 4* had authorized dealers of the *Noticee No. 4* viz. Rajiv Kapoor (*Noticee No. 5*), Jagat Singh (*Noticee No.6*) to place orders in the trading accounts of Venus Portfolios Private Limited (***Noticee No. 8***), Gemini Portfolios Private Limited (***Noticee No. 9***), on the instructions of the *Noticee No. 1*.

**6.6** It is seen that Lalit Bhasin (***Noticee No. 2***) is the cousin of Sanjiv Bhasin (***Noticee No. 1***) and also Director/shareholder of RRB Master (***Noticee No. 4***). Further, Lalit Bhasin (***Noticee No. 2***), Ashish Kapur (***Noticee No. 3***) and Praveen Gupta (***Noticee No. 7***) were the authorized persons to operate trading and bank accounts of RRB Master. Investigation has revealed that the *Noticee No. 2*, in the capacity of being an Advisor to Venus and Gemini, allowed Sanjiv Bhasin to carry out trades in the trading accounts of Venus and Gemini, in which Lalit Bhasin was the Beneficial owner by virtue of his major shareholding, as shown hereinafter. The details of companies in which Lalit Bhasin, is a director /shareholder /promoter are tabulated below:

Table 7

| Sl. No. | Company Name                        | Role Played/Designation                             |
|---------|-------------------------------------|-----------------------------------------------------|
| 1       | RRB Master Securities Delhi Limited | Director (Promoter)                                 |
| 2       | Venus Portfolios Private Limited    | Advisor/major Shareholder /Ultimate Beneficiaries   |
| 3       | Gemini Portfolios Private Limited   | Advisor/major Shareholder /Ultimate Beneficiaries   |
| 4       | HB Stock Holdings Limited           | Executive Director- Chairperson related to Promoter |
| 5       | Leo Portfolios Private Limited      | Shareholder                                         |

**6.7** Ashish Kapur, during his statement recorded under oath dated January 06, 2025 stated that he looked after the day to day operations of the *Noticee No. 4*. Further, he also mirrored the trades of Sanjiv Bhasin, executed through the dealers of RRB Master, in his personal account as well as in the account of his owned/controlled entity Leo Portfolios Private Limited (***Leo/Noticee No. 11***”), through the CTCL ID allotted to him. Investigation also revealed that a CTCL Terminal having terminal ID- 110034002008 was



allotted in the name of Ashish Kapur as Dealer of RRB Master. Details of the same are tabulated below:

Table 8

| DEALER NAME  | SEGMENT | CTCL ID      | ADDRESS OF RRB MASTER                                                                  | MO.        | EMAIL                  |
|--------------|---------|--------------|----------------------------------------------------------------------------------------|------------|------------------------|
| Ashish Kapur | CM & FO | 110034002008 | A-2,3,4 Third Floor, HB Twin Tower, Netaji Subhash Place, Pitampura, New Delhi, 110034 | 981****967 | *****@investshoppe.com |

## 7. Information Misusers (who may also be beneficiary/profit maker)

**7.1** Rajiv Kapoor (**Noticee No. 5**) and Jagat Singh (**Noticee No. 6**) were dealers of RRB Master who placed orders in the trading accounts of Venus, Gemini and HB Stockholdings, as per the instructions of Sanjiv Bhasin as received from time to time over phone calls/WhatsApp chats before the same recommendations were made public by Sanjiv Bhasin on Media Channels. Further, *Noticee Nos. 5 and 6* being privy to the recommendations of trades of Sanjiv Bhasin, mirrored the same trades as done in accounts of Venus, Gemini and HB in their own accounts also.

**7.2** During the investigation period, the *Noticee No. 5* used to place the orders of clients of RRB Master through CTCL ID-110034002006 located at address “H-72, Connaught Circus New Delhi -110001, India” of RRB Master.

Table 9

| DEALER NAME  | SEGMENT | CTCL ID      | ADDRESS OF RRB MASTER                            | MO.        | EMAIL                  |
|--------------|---------|--------------|--------------------------------------------------|------------|------------------------|
| Rajiv Kapoor | CM & FO | 110034002006 | H-72, Connaught Circus New Delhi - 110001, India | 981****406 | *****@investshoppe.com |

**7.3** During the investigation period, the *Noticee No. 6* used to place the orders of clients of RRB Master through CTCL ID-110034002002 located at address “A-2,3,4 Third Floor, HB Twin Tower, Netaji Subhash Place, Pitampura, New Delhi, 110034” of RRB Master.

Table 10



| DEALER NAME | SEGMENT | CTCL ID      | ADDRESS OF RRB MASTER                                                                  | MO.        | EMAIL                  |
|-------------|---------|--------------|----------------------------------------------------------------------------------------|------------|------------------------|
| Jagat Singh | CM & FO | 110034002002 | A-2,3,4 Third Floor, HB Twin Tower, Netaji Subhash Place, Pitampura, New Delhi, 110034 | 852****988 | *****@investshoppe.com |

**7.4** Investigation revealed that Praveen Gupta (**“Noticee No. 7”**) was also one of the authorised signatories of the bank account of RRB Master. He had received information about impending orders/recommendations of Sanjiv Bhasin and was in proximity to the location of other dealers of RRB Master, placing orders on such recommendations. It was revealed that Praveen Gupta carried out similar trades in the account of his wife Babita Gupta (**“Noticee No. 12”**).

## 8. Profit Makers

**8.1** Venus Portfolios Private Limited (**Noticee No. 8**), Gemini Portfolios Private Limited (**Noticee No. 9**), HB Stockholdings Limited (**Noticee No. 10**), Leo Portfolios Private Limited (**Noticee No. 11**) and Babita Gupta (**Noticee No. 12**) have been identified as Profit Makers in the alleged fraudulent scheme devised by the *Noticee No. 1*. As discussed earlier, some of the Enablers have also been beneficiary/profit makers by mirroring trades in their own account or accounts of related person/entity. Venus and Gemini are unlisted companies. HB is a listed company. As per the details obtained from MCA website, Lalit Bhasin was Executive Director and authorized signatory for placing orders for HB with RRB Master.

### Venus

**8.2** As per the details available on the website of Ministry of Corporate Affairs (**“MCA”**), registered address of Venus is *“H-72, Connaught Circus New Delhi -110001, India”*, similar to that of RRB Master. The details of its Directors/Company Secretary and shareholders are tabulated in the below tables:

Table 11

| Sl. | Name | Designation | % Shareholding |
|-----|------|-------------|----------------|
|-----|------|-------------|----------------|



|   |                   |                         | as on March 31, 2023 |
|---|-------------------|-------------------------|----------------------|
| 1 | Megh Shyam Sharma | Director (Independent)  | 0% (5 Shares)        |
| 2 | Raj Kumar Sharma  | Director (Professional) | Nil                  |
| 3 | Rakhi Nagpal      | Company Secretary       | Nil                  |

Table 12

| Sl. | Name                         | No. of shares | %Shareholding as on March 31, 2023 |
|-----|------------------------------|---------------|------------------------------------|
| 1   | Merrygold Investments Ltd.   | 50000         | 19.23                              |
| 2   | Jupiter Portfolios Pvt Ltd   | 50000         | 19.23                              |
| 3   | Aquarious Portfolios Pvt Ltd | 80000         | 30.77                              |
| 4   | Bhasin Investments Ltd       | 30000         | 11.54                              |
| 5   | Gemini Portfolios Pvt Ltd    | 50000         | 19.23                              |
| 6   | Megh Shyam Sharma            | 5             | 0                                  |
| 7   | Inder Prakash                | 2             | 0                                  |
| 8   | Subhash Garg                 | 13            | 0                                  |
|     | Total                        | 260020        | 100%                               |

**8.3** Upon a perusal of the shareholding structure of Venus in the above table, it was observed that there was a complex web of shareholding among connected entities and there was a cross shareholding among several connected entities (e.g. Venus, Gemini, Bhasin Investment, Aquarious etc.) to possibly obfuscate the identity as well as exact shareholding of the Ultimate Beneficial Owner. To calculate the ultimate shareholding of Venus held by various beneficiaries, three levels of shareholding structure were analysed. The details of the ultimate shareholding structure of Venus as on March 31, 2023 are as follows:

Table 13

| Shareholding analysis of Venus Portfolios Pvt Limited |        |               |        |                 |  |                                |                   |
|-------------------------------------------------------|--------|---------------|--------|-----------------|--|--------------------------------|-------------------|
| 1st Level (A)                                         |        | 2nd Level (B) |        | Third Level (C) |  | Final Shareholding (D = A*B*C) | Final Shareholder |
| Merry Gold Investments Limited                        | 19.23% | Lalit Bhasin  | 12.60% |                 |  | 2.42%                          | Lalit Bhasin      |
| Jupiter Portfolios P Ltd.(Jupiter)                    | 19.23% |               |        |                 |  | 19.23%                         | Jupiter           |
|                                                       | 30.77% | Mamta Kapur   | 96.00% |                 |  | 29.53%                         | Mamta Kapur       |



|                                        |        |                         |        |               |        |         |               |
|----------------------------------------|--------|-------------------------|--------|---------------|--------|---------|---------------|
| Aquarius Portfolios P Ltd. (Aquarius)  |        | Bhasin Investments Ltd. | 4.00%  | Sanjiv Bhasin | 4.78%  | 0.06%   | Sanjiv Bhasin |
|                                        |        |                         |        | Lalit Bhasin  | 40.47% | 0.50%   | Lalit Bhasin  |
| Bhasin Investments Ltd.                | 11.54% | Sanjiv Bhasin           | 4.78%  |               |        | 0.55%   | Sanjiv Bhasin |
|                                        |        | Lalit Bhasin            | 40.47% |               |        | 4.67%   | Lalit Bhasin  |
| Gemini Portfolios Pvt Limited (Gemini) | 19.23% |                         |        |               |        | 19.23 % | Gemini        |

**8.4** For reference, the ultimate beneficiary details of Venus are tabulated below:

Table 14

| Shareholder Name              | Shareholding % |
|-------------------------------|----------------|
| Gemini Portfolios Pvt Limited | 19.23          |
| Jupiter                       | 19.23          |
| Lalit Bhasin                  | 7.59           |
| Mamta Kapur                   | 29.53          |
| Sanjiv Bhasin                 | 0.61           |
| <b>Grand Total</b>            | <b>76.19</b>   |

**8.5** It was further seen that Directors mentioned in Table 11 were authorized signatories for operating the bank account of Venus, held with HDFC Bank and for placing orders in the trading account of Venus. Further, Venus carried out 99.90% of its trades (7659 out of 7666 trades) through RRB Master during the IP. It is seen that though Directors mentioned at Table 11 were appointed as Directors of Venus, but were not involved in the day-to-day operations of Venus. Further, as against significant trading happened in the trading account of Venus on regular basis, Directors had negligible calls with dealers of RRB Master and most of their calls were with the *Noticee No. 2*.

### **Gemini**

**8.6** As per details available on the website of Ministry of Corporate Affairs (“MCA”), registered address of Gemini is “820, 8th Floor 21 Naurang House, KG Marg New Delhi 110001 India”. The details of its Directors/Company Secretary and the shareholders as on March 31, 2023 are tabulated in the below tables:



Table 15

| Sl. | Name              | Designation             | % Shareholding as on March 31, 2023 |
|-----|-------------------|-------------------------|-------------------------------------|
| 1   | Arvind Kumar Jain | Director (Professional) | Nil                                 |
| 2   | Murari Lal        | Director (Professional) | Nil                                 |
| 3   | Rashmi            | Company Secretary       | Nil                                 |

Table 16

| Sl. | Name                        | No. of shares | % Shareholding as on March 31, 2023 |
|-----|-----------------------------|---------------|-------------------------------------|
| 1   | Megh Shyam Sharma           | 10            | 0                                   |
| 2   | Inder Prakash               | 4             | 0                                   |
| 3   | Subhash Garg                | 26            | 0                                   |
| 4   | RRB Securities Limited      | 30000         | 15                                  |
| 5   | Aquarius Portfolios Pvt Ltd | 100000        | 50                                  |
| 6   | Venus Portfolios Pvt Ltd    | 70000         | 35                                  |
|     | <b>Total</b>                | <b>200040</b> | <b>100</b>                          |

8.7 The details of the ultimate shareholding structure of Gemini as on March 31, 2023 (upto fourth level) are as follows:

Table 17

| Gemini Portfolios Pvt Ltd |               |                         |        |                         |        |                                  |        |                   |               |
|---------------------------|---------------|-------------------------|--------|-------------------------|--------|----------------------------------|--------|-------------------|---------------|
| 1st Level (A)             | 2nd Level (B) | Third Level (C)         |        | Fourth Level (D)        |        | Final Shareholding (E = A*B*C*D) |        | Final Shareholder |               |
| Venus Portfolios Pvt Ltd  | 35.00%        | Merry Gold              | 19.23% | Lalit Bhasin            | 12.60% |                                  |        | 0.85%             | Lalit Bhasin  |
|                           |               | Jupiter                 | 19.23% |                         |        |                                  |        | 6.73%             | Jupiter       |
|                           |               | Aquarius                | 30.76% | Mamta Kapur             | 96.00% |                                  |        | 10.34%            | Mamta Kapur   |
|                           |               |                         |        | Bhasin Investments Ltd. | 4.00%  | Sanjiv Bhasin                    | 4.78%  | 0.07%             | Sanjiv Bhasin |
|                           |               |                         |        |                         |        | Lalit Bhasin                     | 40.47% | 0.57%             | Lalit Bhasin  |
|                           |               | Bhasin Investments Ltd. | 11.53% | Sanjiv Bhasin           | 4.78%  |                                  |        | 0.19%             | Sanjiv Bhasin |
|                           |               |                         |        | Lalit Bhasin            | 40.47% |                                  |        | 1.63%             | Lalit Bhasin  |



| Gemini Portfolios Pvt Ltd |     |                               |         |                 |         |                  |  |                                  |                               |
|---------------------------|-----|-------------------------------|---------|-----------------|---------|------------------|--|----------------------------------|-------------------------------|
| 1st Level (A)             |     | 2nd Level (B)                 |         | Third Level (C) |         | Fourth Level (D) |  | Final Shareholding (E = A*B*C*D) | Final Shareholder             |
|                           |     | Gemini Portfolios Pvt Limited | 19.23 % |                 |         |                  |  | 6.73%                            | Gemini Portfolios Pvt Limited |
| Aquarius Portfolio P Ltd. | 50% | Mamta Kapur                   | 96 %    |                 |         |                  |  | 48.00%                           | Mamta Kapur                   |
|                           |     | Bhasin Investments Ltd.       | 4%      | Sanjiv Bhasin   | 4.78 %  |                  |  | 0.10%                            | Sanjiv Bhasin                 |
|                           |     |                               |         | Lalit Bhasin    | 40.47 % |                  |  | 0.81%                            | Lalit Bhasin                  |
| RRB Securities Ltd.       | 15% | Lalit Bhasin                  | 48 %    |                 |         |                  |  | 7.27%                            | Lalit Bhasin                  |
|                           |     | Mamta Kapur                   | 8.69 %  |                 |         |                  |  | 1.30%                            | Mamta Kapur                   |

**8.8** On a perusal of the above table, it is seen that Mamta Kapur held 59.64% share capital in Gemini through Venus, Aquarius and RRB Master. Sanjiv Bhasin held 0.36% share capital in Gemini through Venus and Aquarius either directly/indirectly. Lalit Bhasin held 11.12% share capital in Gemini through Venus, Aquarius and RRB Master either directly/indirectly. **Gemini also held 6.73% share capital indirectly in itself.** It was further seen that Lalit Bhasin along with Mamta Kapur and Sanjiv Bhasin held major controlling stake in Gemini Portfolio directly/indirectly. The details of ultimate beneficial holdings in Gemini are tabulated in the table below:

Table 18

| Shareholder Name              | Shareholding % |
|-------------------------------|----------------|
| Gemini Portfolios Pvt Limited | 6.73           |
| Jupiter                       | 6.73           |
| Lalit Bhasin                  | <b>11.12</b>   |
| Mamta Kapur                   | <b>59.64</b>   |
| Sanjiv Bhasin                 | <b>0.36</b>    |
| <b>Grand Total</b>            | <b>84.58</b>   |

**8.9** Gemini carried out 99.09% of its trades (2396 out of 2418 trades) through RRB Master during the IP. Arvind Kumar Jain and Murari Lal (Directors) were authorized signatories for placing orders for Gemini with RRB Master,



trading member, and for operating the bank account of Gemini held with HDFC Bank, during the IP.

**8.10** It was found that Lalit Bhasin was associated with Venus and Gemini in the capacity of being an Advisor and had authorised Sanjiv Bhasin to trade in accounts of Venus and Gemini and resultantly, Sanjiv Bhasin had carried out trades in the trading accounts of Venus, Gemini and HB contrary to his recommendations made in Media Channels, through the dealers of RRB Master. Investigation revealed that trades in the account of Venus were carried out by Sanjiv Bhasin through the dealers of RRB Master, which has also been confirmed by the *Notictee No. 1* in his statement dated Jan 10, 2025 recorded under oath that Lalit Bhasin had authorized him to place trades in the account of Venus through RRB Master.

### **HB**

**8.11** As per the details available on MCA website, HB Stock Holdings Limited (“HB”) (CIN No. L65929HR1985PLC033936) is a listed company having registered address at “Plot No. 31, Echelon Institutional Area, Institutional Area Sector-32 Gurgaon Haryana 122001 India”. The details of its directors/Company Secretary are tabulated in the table below:

Table 19

| Sl. | Name              | DIN & PAN  | Designation                                         | % Shareholding as on March 31, 2024 |
|-----|-------------------|------------|-----------------------------------------------------|-------------------------------------|
| 1   | Lalit Bhasin      | AFDPB2550A | Executive Director- related to Chairperson Promoter | 51.54%                              |
| 2   | Gulshan Rai       | AAEPR4235J | Director (Independent)                              | Nil                                 |
| 3   | Anil Goyal        | AAAPG5807D | Non-Executive - Non Independent Director            | Nil                                 |
| 4   | Asha Mehra        | AAPPM6714N | Non-Executive - Independent Director                | Nil                                 |
| 5   | Ashish Kapur      | AJPPK9522R | Non-Executive - Non Independent Director            | Nil                                 |
| 6   | Urvija Shah       | -          | Non-Executive - Independent Director                | Nil                                 |
| 7   | Yash Kumar Sehgal | BDXPS4867A | Non-Executive - Independent Director                | Nil                                 |





|   |                    |   |                                        |     |
|---|--------------------|---|----------------------------------------|-----|
| 8 | Mahesh Kumar Gupta | - | CFO                                    | Nil |
| 9 | Reema Miglani      | - | Company Secretary & Compliance Officer | Nil |

**8.12** The details of its shareholders are tabulated in the table below:

Table 20

| Sl.          | Name                       | No. of shares | % Shareholding as on March 31, 2024 |
|--------------|----------------------------|---------------|-------------------------------------|
| 1            | Lalit Bhasin               | 36,78,691     | 51.54                               |
| 2            | Manasvin Arora             | 22,500        | 0.32                                |
| 3            | Kanishk Kapur              | 22,500        | 0.32                                |
| 4            | Ayush Kapur                | 22,500        | 0.32                                |
| 5            | Mehar Arora                | 22,500        | 0.32                                |
| 6            | H B Corporate Services Ltd | 20,496        | 0.29                                |
| 7            | Merrygold Investments Ltd  | 9,148         | 0.13                                |
| 8            | Public                     | 33,39,330     | 46.78                               |
| <b>Total</b> |                            |               | <b>100%</b>                         |

**8.13** Upon perusal of the above tables, it can be seen that Lalit Bhasin held major shareholding in HB (51.54%) and was the Whole-time Director cum Promoter (sole Executive Director) in HB. During the statement recording under oath, Sanjiv Bhasin had stated that Lalit Bhasin had authorized him to place trades in accounts of Venus and Gemini, however, dealers of RRB Master may have used the account of HB for carrying out trades due to shortage of margins in Venus and Gemini.

**8.14** Further, HB carried out 90.44% of its trades (5755 out of 6363 trades) through the trading member, RRB Master. It was found during the investigation that Sanjiv Bhasin carried out fraudulent trades in account of HB also, similar to the pattern followed in Venus and Gemini.

### **Leo**

**8.15** As per the details available on MCA website, Leo Portfolios Private Limited ("**Leo**") (CIN-U65100DL1995PTC064010) is an unlisted company having registered address "*H 72 Connaught Circus New Delhi 110001 India*", same as the registered address of RRB Master. The details of directors/Company Secretary of Leo are tabulated below:



Table 21

| Sl. | Name         | Designation         | % Shareholding as on March 31, 2023 |
|-----|--------------|---------------------|-------------------------------------|
| 1   | Ashish Kapur | Director (Promoter) | 36.61%                              |
| 2   | Mamta Kapur  | Director (Promoter) | 20.83%                              |

**8.16** The details of its shareholders are tabulated in the table below:

Table 22

| Sl.                                                                                                                    | Name                                 | No. of shares | % Shareholding as on March 31, 2023 |
|------------------------------------------------------------------------------------------------------------------------|--------------------------------------|---------------|-------------------------------------|
| 1                                                                                                                      | Ashish Kapur                         | 7,23,464      | 36.61%                              |
| 2                                                                                                                      | Mamta Kapur                          | 4,11,600      | 20.83%                              |
| 3                                                                                                                      | Lalit Bhasin                         | 2,36,800      | 11.98%                              |
| 4                                                                                                                      | Kanishk Kapur                        | 1,14,000      | 5.76%                               |
| 5                                                                                                                      | Invest Shoppe India Private Limited* | 4,90,000      | 24.79%                              |
|                                                                                                                        | <b>Total</b>                         |               | <b>100%</b>                         |
| *Invest Shoppe is a company owned/held/controlled by Mr.***** (son of Ashish Kapur) holding 89% shareholding (approx.) |                                      |               |                                     |

**8.17** Ashish Kapur was the authorized signatory for placing orders for Leo with RRB Master and for operating the bank account of Leo. Upon perusal of the shareholding structure in the above table, it can be seen that Ashish Kapur was holding 36.61% shareholding in Leo in his name, 20.83% in his wife's name, and was also Director of Leo. Further, Ashish Kapur used to take all the trading related decisions in the account of Leo.

**8.18** Leo carried out 86.62% trades (8826 out of 10189 trades) through RRB Master during the IP. It was found during the investigation that Ashish Kapur being aware of trades of Sanjiv Bhasin being carried out in accounts of Venus, Gemini and HB through dealers of RRB Master, traded in the similar fraudulent manner in the account of Leo and made ill-gotten gains.

### **Babita Gupta**

**8.19** Investigation revealed that Babita Gupta was wife of Praveen Gupta ("**Noticee No. 7**"). Praveen Gupta based on information received about impending orders/recommendations of Sanjiv Bhasin carried out similar



trades in the account of his wife Babita Gupta ("**Noticee No. 12**") and thereby made profit in the account of the *Noticee No. 12*.

### **C. KEY EVIDENCES COLLECTED DURING THE INVESTIGATION AND SEARCH & SEIZURE**

9. During the investigation and the search, seizure conducted at the premises of *Noticees*, following evidences have been collected:
  - i. data contained in electronic devices seized during search and seizure operation;
  - ii. Analysis of Client Application Forms ('**CAF**') provided by Telecom Service Providers ('**TSP**');
  - iii. Evidence of connection amongst *Noticees* based on the Call Data Records ('**CDR**') of *Noticees* before and after the recommendations made on Media Channels;
  - iv. Analysis of KYC details, trading activities of entities, bank account statements and statements of the *Noticees* taken under oath;
  - v. Analysis of recorded videos and data of recommendation provided by News channels viz. 'CNBC Awaaz', 'CNBC English' 'ET Now', 'ET Now Swadesh' and 'Zee Business'
  - vi. Analysis of recommendation data on IIFL's Telegram Channel;
  - vii. Analysis of relevant material available on Ministry of Corporate Affairs (MCA) website regarding the *Noticee* companies;
  - viii. Data provided by RRB Master; and
  - ix. Contents of calls made
10. These evidences are discussed in succeeding paragraphs in the following chronology: (i) connection between *Noticees* through Call Data Records and proximity while placing orders based on the recommendations/instructions of Sanjiv Bhasin; (ii) analysis of sharing of the Non Public Information with dealers and carrying out opposite trades (sell) contrary to recommendations of Sanjiv Bhasin on Media Channels. Pursuant to the analysis of factual issues, it has been examined as to whether these facts would lead to *prima facie* finding on violation of provisions of the SEBI Act, PFUTP Regulations and RA Regulations.



#### **D. CONNECTIONS AMONGST *NOTICEES* AND OTHER ENTITIES INVOLVED IN THE MATTER**

11. Connection of *Noticee* Nos. 2 and 3 through ownership of *Noticee* Nos. 8 to 11 have already been discussed earlier. Their connection with RRB Master (*Noticee* No. 4) and dealers (*Noticee* Nos. 5 & 6) have also been discussed earlier. Further, it has been observed that Sanjiv Bhasin and Lalit Bhasin are cousin brothers. During the period Mar 2022- Feb 2024, there were 09 phone calls between Sanjiv Bhasin (981\*\*\*\*162) and Lalit Bhasin (981\*\*\*\*778). On December 08, 2023 Ms. \*\*\*\*\* (wife of Sanjiv Bhasin) (HDFC A/c No. 03131\*\*\*\*1843) had received 15 Lacs rupees through cheque no. \*\*\*\*\* from Lalit Bhasin (HDFC A/c No. 00030\*\*\*\*0379). It can be seen that Sanjiv Bhasin and Lalit Bhasin are connected with each other through natural relationship as well as through phone calls, WhatsApp chats (as shown in succeeding paras).
12. As per the statement of Lalit Bhasin recorded by the Investigating Authority on oath, it was stated by him that he, being the Director of RRB Master, had authorized dealers of RRB Master to allow Sanjiv Bhasin to place buy/sell orders and trades in the trading accounts of Venus and Gemini. He further clarified that he, in the capacity of Advisor to these companies, had authorized Sanjiv Bhasin to place aforesaid orders in trading accounts of Venus and Gemini. This is further corroborated and evidenced by facts that orders were placed in accounts of Venus and Gemini by dealers of RRB Master, viz. Rajiv Kapoor and Jagat Singh, on recommendations of Sanjiv Bhasin.
13. In a few instances, it has also been revealed during the investigation that Lalit Bhasin used to remain in constant touch with Sanjiv Bhasin while the orders were placed based on his instructions.
14. Lalit Bhasin managed the day to day affairs/management of Venus and Gemini directly/indirectly, being associated with them in the capacity of an Advisor. Lalit Bhasin was the Executive Director cum Promoter of HB during the investigation period, having 51.54% shareholding. Ashish Kapur, brother-in-law of Lalit



Bhasin, was also connected with HB in the capacity of being a Non-Executive Non-Independent Director. Further, it has been seen that Lalit Bhasin was one of the authorized signatories for operating the bank account of HB. Moreover, as per the data received from RRB Master, it has been observed that Lalit Bhasin was one of the authorized signatories for placing orders for HB, with RRB Master, during the investigation period.

15. In the statement recorded by Investigating Authority on oath, Sanjiv Bhasin had categorically stated that Lalit Bhasin had authorised him to place buy/sell orders/trades in the trading accounts of Venus and Gemini through the dealers of RRB Master viz. Rajiv Kapoor, Jagat Singh, etc. thereby establishing *prima facie* connection between them. He further stated that dealers of RRB Master may have used the account of HB for carrying out trades rarely, due to shortage of margin in accounts of Venus and Gemini.
16. During the investigation period, Sanjiv Bhasin was using three mobile numbers viz. 981\*\*\*\*162, 965\*\*\*\*769 & 729\*\*\*\*299. Though, as per the analysis of KYC documents obtained, the mobile no. 965\*\*\*\*5769 was registered in the name of Sanjiv Bhasin's wife, however, Phone calls/WhatsApp chats with dealers of RRB Master and others prove that this number was also being used by Sanjiv Bhasin. During the period Mar 2022-Feb 2024, it has been noted that there were calls between Sanjiv Bhasin and/or dealers of RRB Master during the timing of placement of trades as shown in succeeding paragraphs, the details of which are provided in the table below:

Table 23

| A                                                       | B                             | A to B       |                       | B to A       |                       | Remarks |
|---------------------------------------------------------|-------------------------------|--------------|-----------------------|--------------|-----------------------|---------|
|                                                         |                               | No. of calls | Duration (in seconds) | No. of calls | Duration (in seconds) |         |
| Sanjiv Bhasin (981** **162)<br><br>Period : (March 2022 | Praveen Gupta – (981****9 59) | 5            | 125                   | 2            | 37                    |         |
|                                                         | Rajiv Kapoor– (981****4 06)   | 82           | 5557                  | 23           | 1091                  |         |
|                                                         | Dealer 2–                     | 26           | 2425                  | 18           | 905                   |         |

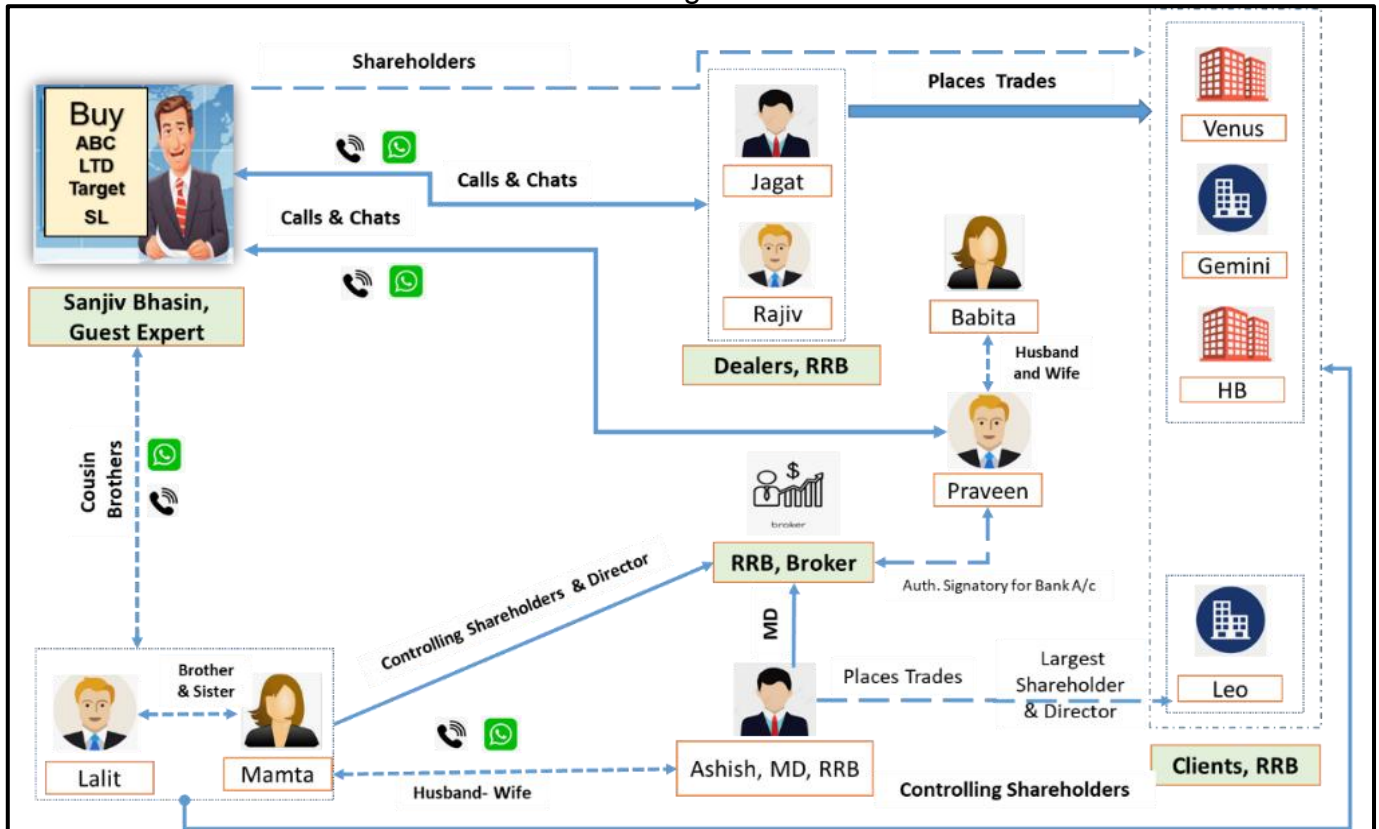


|                                                                                                                                                                                                                                                                                                                                                       |                                        |      |        |     |       |                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------|--------|-----|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| to Feb 2024)                                                                                                                                                                                                                                                                                                                                          | (987****199)                           |      |        |     |       |                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                                                                                                                                                                                                                       | Jagat Singh– (836****616 & 852****988) | 537  | 43636  | 257 | 20554 |                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                                                                                                                                                                                                                       | Lalit Bhasin- (981****778)             | 4    | 348    | 5   | 143   |                                                                                                                                                                                                                                                                                                                                    |
| Sanjiv Bhasin (965** **769* )<br>Period : (May 2022 to Nov 2023)                                                                                                                                                                                                                                                                                      | Rajiv Kapoor– (981****406)             | 5460 | 534186 | 647 | 39901 | This mobile number was exclusively used for the purpose of placing orders. The top 3 contacted numbers on this mobile based on number of calls exchanged are to the dealers of RRB Master. Except a handful of the calls, all the thousands of calls made through this number were made around market hours i.e. 0830 to 1600 hrs. |
|                                                                                                                                                                                                                                                                                                                                                       | Dealer 2– (987****199)                 | 29   | 2168   | 6   | 269   |                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                                                                                                                                                                                                                       | Jagat Singh– (836****616 & 852****988) | 2071 | 204275 | 729 | 45789 |                                                                                                                                                                                                                                                                                                                                    |
| *As per the KYC document obtained from Telecom Service Provider, the mobile number (965****769) is registered in the name of Sanjiv Bhasin’s wife. Sanjiv Bhasin in his statement dated June 14, 2024 has confirmed that he used this number. Further, it was also found that the same number was saved as “Guru Kripa” in the phone of Rajiv Kapoor. |                                        |      |        |     |       |                                                                                                                                                                                                                                                                                                                                    |

17. The following pictorial representation/diagram shows the connection amongst different *Noticees* in the matter:



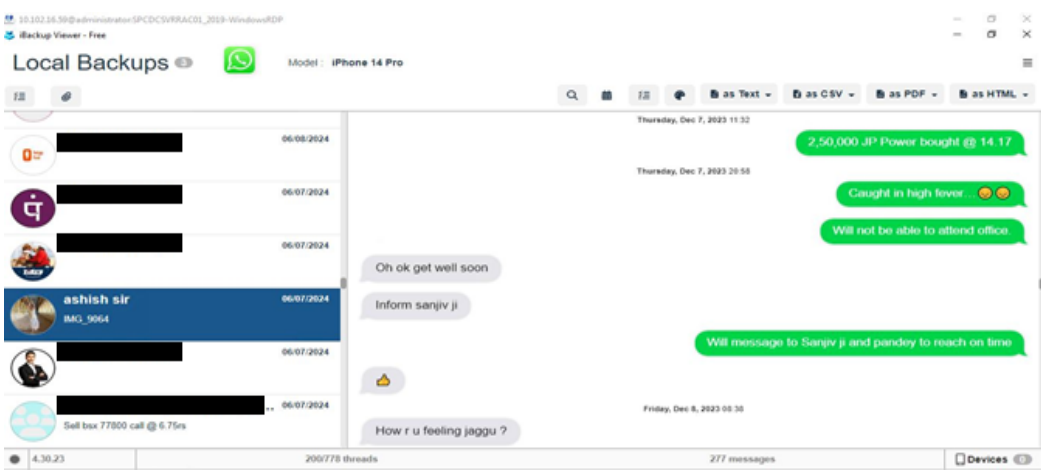
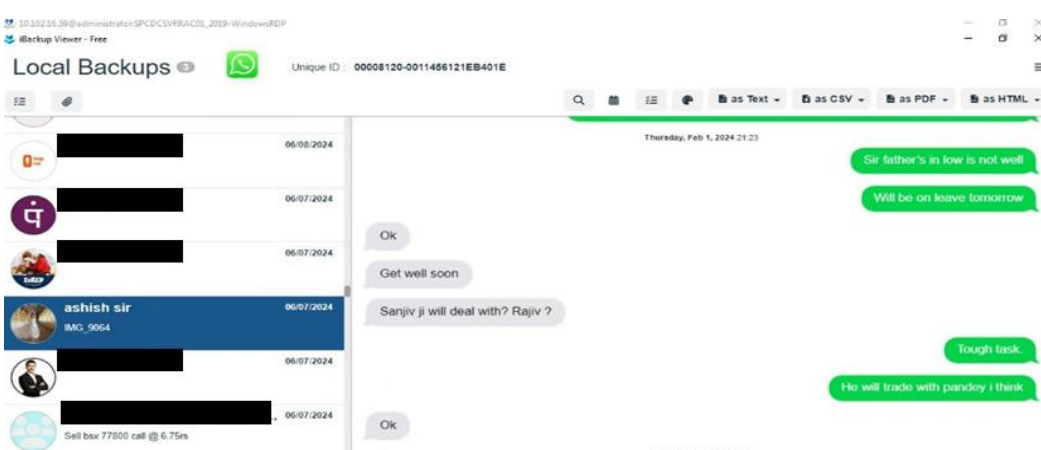
Figure 1



18. The following WhatsApp messages/chats between *Noticee Nos.* 3 and 6 substantiate the connection between entities and it can also be seen that the *Noticee No.* 3 was aware about orders being placed by dealers of RRB Master, viz. *Noticee Nos.* 5 and 6 in trading accounts of Venus, Gemini and HB, on instructions of the *Noticee No.* 1.



Figure 2

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p><b>Inference:</b> On Dec 07, 2023, Jagat informed Ashish that he will not attend the office due to fever for which Ashish informed Jagat to message about his absence to Sanjiv Bhasin. In reply, Jagat has informed that he will message Sanjiv Bhasin about his absence and also inform ***** (Dealer 2), another dealer of RRB, to reach office early to coordinate with Sanjiv Bhasin for his trade.</p> <p>This interaction reveals that, Ashish was aware of Sanjiv Bhasin trading through RRB Master.</p> <p>Similar types of chat were observed between Ashish and Jagat, which are as follows:</p> | <p><u>Text in the image</u></p> <p><b>Jagat Singh –</b></p> <p>2,50,000 JP Power bought @ 14.17</p> <p>Caught in high fever</p> <p>Will not be able to attend office</p> <p><b>Ashish Kapoor -</b></p> <p>Oh ok get Well soon</p> <p>Inform Sanjiv Ji</p> <p><b>Jagat Singh –</b> Will message to Sanjiv Ji and ***** (Dealer 2) to reach on time</p> <p><b>Ashish Kapoor –</b></p> <p>How r u feeling Jaggu?</p> |
| <p style="text-align: center;"><b><u>Date: Feb 01, 2024</u></b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p><u>Text in the image</u></p> <p><b>Jagat Singh</b></p> <p>Sir Father in law is not well</p> <p>Will be on leave tomorrow</p> <p><b>Ashish Kapur</b></p> <p>Ok ....Get Well Soon.....Sanjiv Ji</p>                                                                                                                                                                                                              |





|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Inference:</b> On Feb 01, 2024, Jagat informed Ashish that he would not be able to attend the office tomorrow. In reply, Ashish told Jagat that he could take a leave. However, Ashish enquired with Jagat, who would deal with Sanjiv Bhasin, whether Rajiv would deal with him. In reply, Jagat told Ashish that it is Dealer 2 who will work with him.</p> <p>This shows that Ashish was aware that Jagat was working with Sanjiv Bhasin. In his absence, Jagat asked Dealer 2 to work with Sanjiv Bhasin. This substantiates that Ashish was aware of Sanjiv Bhasin trading through RRB Master Dealers for placing orders.</p>                                                                                                                                                                                                                 | <p>will deal with?<br/>Rajiv ?</p> <p><b>Jagat Singh</b></p> <p>Tough Task</p> <p>He will trade with<br/>****(Dealer 2) I<br/>think</p> <p><b>Ashish Kapur -</b><br/>Ok</p>                                                                                                                                                                                                                                                                                                                                                  |
| <p style="text-align: center;"><b><u>Date: May 21, 2024</u></b></p>  <p><b>Inference:</b> On May 21, 2024, Jagat informed Ashish that he would not be able to attend office and informed that Sanjiv Bhasin would trade with Rajiv Kapoor. In reply, Ashish permitted Jagat to take leave. At the same time, Ashish enquired Jagat that whether he had informed Sanjiv Bhasin and Rajiv Kapoor, as ***** (Dealer 2) was on leave. In reply, Jagat stated that he had already informed Sanjiv Bhasin. Thereafter, Ashish Kapur instructed Jagat to inform Rajiv as well. Accordingly, Jagat told Ashish that he would inform Rajiv.</p> <p>This substantiates that Ashish Kapur was aware of Sanjiv Bhasin trading through RRB Master Dealers, for placing orders.</p> | <p><b><u>Text in the image</u></b></p> <p><b>Jagat Singh -</b><br/>Good Morning Sir..i<br/>Have to complete<br/>Discharge process<br/>of my dad from<br/>Hospital.</p> <p>Sanjiv JI has to<br/>trade with Rajiv<br/>Kapur till 12 pm.</p> <p><b>Ashish Kapur -</b><br/>Yes so hv u told<br/>Rajiv n Sanjeev?<br/>Because Dealer 2<br/>is on leave</p> <p><b>Jagat Singh –</b> Sir I<br/>have informed<br/>Sanjeev Ji</p> <p><b>Ashish Kapur –</b><br/>Pls inform Rajiv<br/>also</p> <p><b>Jagat Singh –</b><br/>Okay sir</p> |



19. Connections amongst Praveen Gupta (*Noticee No. 7*) and Babita Gupta (*Noticee No. 12*) is elaborated in Part B of this Order. Further, the details of *Noticee Nos. 8 to 11* have also been elaborated in Part B of this Order.

**E. MODUS OPERANDI- TRADING PATTERN OF *NOTICEES* BASED ON RECOMMENDATIONS/INSTRUCTIONS SHARED BY GUEST EXPERT SANJIV BHASIN**

20. Sanjiv Bhasin, in the capacity of director IIFL, used to appear in various Media Channels as a Guest Expert and provide stock recommendations. It is seen that the *Noticee No. 1*, before appearing on Media Channels for giving stock recommendations, took positions (majorly buy) in Venus, Gemini and HB through Jagat Singh and Rajiv Kapoor, dealers of RRB Master. Subsequently, he would recommend certain scrips in Media Channels (majorly buy) which would include those scrips in which he would have already taken position (majorly buy), through the dealers of RRB Master. Thereupon, his recommendations on the Media Channels used to create huge impact on the price/volume of the scrip, owing to his large viewership/following on various social media platforms and wider dissemination of information through Media channels/Telegram.
21. Once his recommendations would have created substantial impact on the price/volume of the recommended scrip in the market (as would be discussed later in the succeeding paragraphs in Part F of this Order), he used to instruct dealers of RRB Master to carry out trades (majorly sell) opposite to his own majorly buy recommendations in Media Channels earlier.
22. The important thing to note here in the alleged scheme is that all through this while, Sanjiv Bhasin would constantly remain in touch with dealers of RRB Master for immediate compliance of his directions and trades were placed in trading accounts of Venus, Gemini and HB Stockholdings soon thereafter. Through this scheme, it is seen that substantial profits have been made in these accounts. Lalit Bhasin and Ashish Kapur, connected to Sanjiv Bhasin and



promoter/director of RRB Master facilitated/aided Sanjiv Bhasin in executing these trades in trading accounts of Venus, Gemini and HB, entities related to them, as shown in the preceding paragraphs.

23. Despite recommendations (majorly buy) given to viewers/followers by Sanjiv Bhasin on Media channels and other social media platforms for long term perspectives, he squared off his positions (majorly sell) contrary to his own recommendations, within a few minutes, soon thereafter through dealers of RRB Master in accounts of Venus, Gemini and HB. The evidence collected during the investigation show that Sanjiv Bhasin would remain in continuous touch with dealers and direct them to follow buy/sell instructions, immediately.
24. During the investigation, it was also observed that Ashish Kapur (*Noticee No. 3*), Rajiv Kapoor (*Noticee No. 5*) and Jagat Singh (*Noticee No. 6*), following the above modus operandi, being privy/aware of these trades and recommendations pertaining to shares being given by Sanjiv Bhasin to dealers of RRB Master, had mirrored trades of Sanjiv Bhasin, in their personal accounts also. Ashish Kapur, being the MD of RRB Master traded in personal account as well as through the account of Leo. Further, Jagat and Rajiv, being dealers of RRB Master and being privy to the impending trades of Sanjiv Bhasin, placed trades in an identical manner in their respective personal accounts.
25. Investigation revealed that Praveen Gupta (*Noticee No. 7*) was one of the authorised signatories of the bank account of RRB Master and due to his proximity to the location of other dealers of the *Noticee No. 4* viz. *Noticee Nos. 5 and 6*, had received information about impending orders of the *Noticee No. 1* and had carried out similar trades in the trading account of the *Noticee No. 12*.
26. Upon perusal of the information submitted by RRB Master regarding the dealer wise client mapping data of RRB Master, it was observed that dealers viz. Jagat Singh, Rajiv Kapoor and Dealer 1 (whose CTCL ID was being used by Ashish Kapur) were mapped to entities namely Venus, Gemini and HB who had traded



on the basis of recommendation made by Sanjiv Bhasin on the business TV Channels.

27. By virtue of mapping of clients, namely Venus, Gemini and HB with all dealers of RRB Master namely Rajiv, Jagat and Ashish Kapur, they became privy to trades being carried out by Sanjiv Bhasin in accounts of Venus, Gemini and HB. Thus, such non-public information allowed Rajiv, Jagat and Ashish to carry out similar trades in their respective account and made profit. The mapping of entities with dealers of RRB Master is shown below:

Table 24

| Sr. No. | Dealer name   | Client Name                       | Period                |
|---------|---------------|-----------------------------------|-----------------------|
| 1       | Ashish Kapur  | Babita Gupta                      | 23/11/2020-21/10/2023 |
|         |               | Leo Portfolios Private Limited    | 23/11/2020-21/10/2023 |
| 2       | Dealer 1      | Babita Gupta                      | 01/01/2020-20/02/2024 |
|         |               | Gemini Portfolios Private Limited | 01/01/2020-20/02/2024 |
|         |               | HB Stockholdings Limited          | 01/01/2020-20/02/2024 |
|         |               | Leo Portfolios Private Limited    | 01/01/2020-18/12/2023 |
|         |               | Venus Portfolios Pvt. Ltd         | 01/01/2020-20/02/2024 |
| 3       | Jagat Singh K | Ashish Kapur / HUF                | 01/01/2020-22/12/2023 |
|         |               | Babita Gupta                      | 01/01/2020-28/08/2024 |
|         |               | Gemini Portfolios Private Limited | 01/01/2020-28/08/2024 |
|         |               | HB Stockholdings Limited          | 01/01/2020-28/08/2024 |
|         |               | Leo Portfolios Private Limited    | 01/01/2020-18/12/2023 |
|         |               | Venus Portfolios Pvt. Ltd         | 01/01/2020-28/08/2024 |
| 4       | Rajiv Kapoor  | Ashish Kapur / HUF                | 07/07/2020-22/12/2023 |
|         |               | Babita Gupta                      | 07/07/2020-TILL DATE  |
|         |               | Gemini Portfolios Private Limited | 07/07/2020-TILL DATE  |
|         |               | HB Stockholdings Limited          | 07/07/2020-TILL DATE  |
|         |               | Leo Portfolios Private Limited    | 07/07/2020-18/12/2023 |
|         |               | Venus Portfolios Pvt. Ltd         | 07/07/2020-TILL DATE  |

#### F. ILLUSTRATIONS OF TRADES CARRIED OUT BY *NOTICEES* ON THE BASIS OF STOCK RECOMMENDATIONS GIVEN BY THE GUEST EXPERT

28. As discussed above, during the investigation period, Sanjiv Bhasin appeared in the media channels viz. 'CNBC Awaaz', 'CNBC English', 'ET Now', 'ET Now Swadesh' and 'Zee Business' and also gave recommendations on IIFL's Telegram Channel. For the purpose of investigation, details of



recommendations given by Sanjiv Bhasin on Media Channels were obtained from such channels for the investigation period along with the recommendations' videos. Also, the data was obtained from IIFL for its Telegram Channel. In the succeeding paragraphs, I shall now examine the trades carried out at the behest of the *Noticee No. 1* and trades by other profit makers in light of the recommendations to be given on Media Channels/Telegram, by Sanjiv Bhasin. It shall also be examined as to how the positions taken earlier were immediately squared off after said recommendations were aired/broadcasted.

- 29.** For the purpose of analysis in this section, unless otherwise mentioned, trades have been considered in terms of scrip days. A Scrip day refers to a day in which the client has traded in a combination of trade date and unique symbol. Following trades of *Noticees* were examined for the investigation period, the details of which are tabulated below:

Table 25

| SR. NO.                                          | PAN NO.     | NAME                           | NO. OF SCRIP DAYS |       | GRAND TOTAL |
|--------------------------------------------------|-------------|--------------------------------|-------------------|-------|-------------|
|                                                  |             |                                | BSE*              | NSE*  |             |
| 1.                                               | AAACG4847Q  | Gemini Portfolios Pvt. Limited | 22                | 2396  | 2418        |
| 2.                                               | AAACH0637F  | HB Stockholdings Limited       | 99                | 6264  | 6363        |
| 3.                                               | AAACL2384F  | Leo Portfolios Pvt. Limited    | 100               | 10163 | 10263       |
| 4.                                               | AAACV4306R  | Venus Portfolios Pvt. Ltd      | 7                 | 7659  | 7666        |
| 5.                                               | AAEPG1745N  | Babita Gupta                   | 59                | 1953  | 2012        |
| 6.                                               | AJPPK9522R  | Ashish Kapur                   | 183               | 4988  | 5171        |
| 7.                                               | ARSPK9663Q  | Rajiv Kapoor                   | 10                | 1807  | 1817        |
| 8.                                               | BSRPS9870C  | Jagat Singh                    | 2                 | 4259  | 4261        |
|                                                  | Grand Total |                                | 482               | 39489 | 39971       |
| *BSE – BSE Limited                               |             |                                |                   |       |             |
| *NSE – National Stock Exchange of India Limited. |             |                                |                   |       |             |



30. During the investigation period, *Noticees* cumulatively carried out 39,971 trades on both exchanges. Out of the total trades, 39489 trades (98.79%) were carried out on NSE and mere 482 trades (1.21%) were carried out on BSE, hence trade data obtained from NSE has only been considered for the purpose of examination of trades and calculation of ill-gotten gain.

31. The segment wise trades carried out on NSE by *Noticees* are provided in the table below:

Table 26

| Details of segment wise number of scrip days of <i>Noticees</i> on Exchange (NSE) |              |               |               |               |               |              |
|-----------------------------------------------------------------------------------|--------------|---------------|---------------|---------------|---------------|--------------|
| CLIENT NAME                                                                       | CASH SEGMENT | STOCK FUTURES | STOCK OPTIONS | INDEX FUTURES | INDEX OPTIONS | GRAND TOTAL  |
| Gemini Portfolio Pvt. Ltd                                                         | 266          | 1812          | 158           | 23            | 137           | 2396         |
| HB Stockholdings Ltd                                                              | 2152         | 3726          | 90            | 114           | 182           | 6264         |
| Venus Portfolios Pvt. Ltd                                                         | 125          | 6959          | 151           | 347           | 77            | 7659         |
| <b>Sub-Total (A)</b>                                                              | <b>2543</b>  | <b>12497</b>  | <b>399</b>    | <b>484</b>    | <b>396</b>    | <b>16319</b> |
| Leo Portfolios Pvt. Ltd                                                           | 1469         | 3056          | 2415          | 119           | 3104          | 10163        |
| Ashish Kapur                                                                      | 1200         | 1897          | 265           | 48            | 1578          | 4988         |
| Rajiv Kapoor                                                                      | 137          | 1648          | 0             | 3             | 19            | 1807         |
| Jagat Singh                                                                       | 402          | 2633          | 1082          | 10            | 132           | 4259         |
| Babita Gupta                                                                      | 579          | 1020          | 59            | 70            | 225           | 1953         |
| <b>Sub-Total (B)</b>                                                              | <b>3787</b>  | <b>10254</b>  | <b>3821</b>   | <b>250</b>    | <b>5058</b>   | <b>23170</b> |
| <b>Grand Total (A+B)</b>                                                          | <b>6330</b>  | <b>22751</b>  | <b>4220</b>   | <b>734</b>    | <b>5454</b>   | <b>39489</b> |

32. From the above table, it is seen that majority of trades of *Noticee* Nos. 8, 9 and 10 were in Cash and Stock Futures segment i.e. 15040 (i.e. 2543 + 12497) scrip days out of 16319 scrip days which is 92.16% of total trades. Similarly, trades of other *Noticees* in cash and Stock Futures segment constituted 60.59 % (i.e. 14041 (i.e. 3787+10254) days out of 23170 scrip days). Further, it is pertinent to mention here that majority of recommendations of the *Noticee* No. 1 on Media Channels/Telegram, were mainly in Cash and Stock Futures Segment.



## F.1 Illustration of recommendation on Zee Business news channel- L&T Technology Services Limited

33. In the first illustration, Sanjiv Bhasin made a guest appearance on Zee Business news channel in the show “Bhasin ke Hasin share” on January 11, 2022. At 13:33 PM, he recommended to buy shares of L&T Technology Services Limited (scrip code “LTTS”). The screenshot below depicts such recommendation:

Figure 3



34. The details of recommendation are as follows:

Table 27

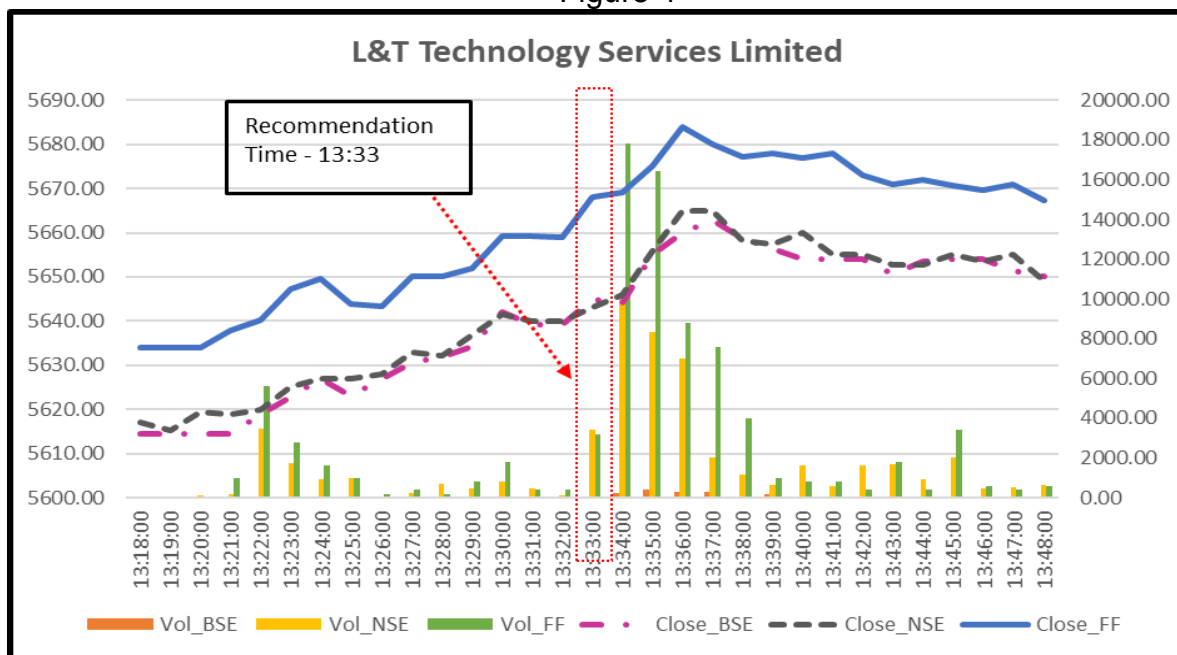
| Date         | Scrip                                     | CMP     | Target Price | Stop Loss | Recommendation  |
|--------------|-------------------------------------------|---------|--------------|-----------|-----------------|
| Jan 11, 2022 | L&T Technology Services Limited (“LTTS”). | 5644.80 | ₹5800        | ₹5520     | Buy (Long term) |

Impact of the recommendation on the Price and Volume of the scrip is shown in the following paragraphs. The price and volume chart, during 15 minutes pre and post the recommendation time (i.e. 13:33 PM) in the scrip of “LTTS” in BSE Equity Cash segment, NSE equity cash segment and NSE Futures is given below:





Figure 4



35. The details of the significant impact on the price and trading volume of the scrip, as observed in the above graph is depicted below:

Table 28

| Date of recommendation            |                                                                                            | January 11, 2022                |          |          |
|-----------------------------------|--------------------------------------------------------------------------------------------|---------------------------------|----------|----------|
| Time of recommendation (t)        |                                                                                            | 13:33 PM                        |          |          |
| Scrip/Contract Recommended        |                                                                                            | LTTS                            |          |          |
| Recommended Levels (For Cash)     | Recommended Price (₹)                                                                      | 5640-5660                       |          |          |
|                                   | Target Price (₹)                                                                           | 5800                            |          |          |
|                                   | Stop Loss (₹)                                                                              | 5520                            |          |          |
| Recommended Scrip/Contract        |                                                                                            | L&T Technology Services Limited |          |          |
|                                   |                                                                                            | NSE (FF)                        | NSE (EQ) | BSE (EQ) |
| Price Impact Post Recommendation  | Average High/ Low variation % in preceding 15 mins [t-15]                                  | 0.04%                           | 0.08%    | 0.04%    |
|                                   | Average High/ Low variation % during recommendation time and succeeding 2 mins [t and t+2] | 0.26%                           | 0.22%    | 0.15%    |
|                                   | Average High/ Low variation % in succeeding 15 mins [t+15]                                 | 0.11%                           | 0.14%    | 0.10%    |
| Volume Impact Post Recommendation | Avg Trading vol in preceding 15 mins [t-15] (number of shares/underlying shares)           | 1350                            | 687      | 17       |





|                                                                                                   |                                                                                                                   |       |      |     |
|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------|------|-----|
|                                                                                                   | Avg Trading Vol during recommendation time and succeeding 2 mins [t and t+2] (number of shares/underlying shares) | 12467 | 7302 | 229 |
|                                                                                                   | Avg Trading Vol for succeeding 15 mins [t+15] (number of shares/underlying shares)                                | 4250  | 2674 | 114 |
| Relevant Price Sensitive Corporate Announcement on the day of the recommendation or the prior day |                                                                                                                   | No    |      |     |

**36.** The analysis of the price impact in the LTTS scrip shows the following:

- i. In the preceding 15 minutes before the recommendation, the average high/low price variation was relatively low at 0.04%, 0.08%, 0.04% for LTTS scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. However, during the recommendation time and the subsequent 2 minutes (t and t+2), there was a significant surge in price volatility, with an average high/low variation of 0.15%, 0.22% and 0.26% for LTTS scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average high/low variation stood at 0.10%, 0.14%, 0.11% for LTTS scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.

**37.** An analysis of the volume impact in the scrip shows the following:

- i. The average trading volume in the 15 minutes leading up to the recommendation (t-15) was 17 shares, 687 shares and 1350 shares for LTTS scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. During the recommendation time and the following 2 minutes (t and t+2), the trading volume experienced a substantial increase, reaching an average of 229 shares, 7302 shares, and 12467 shares for LTTS scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average trading volume remained elevated at 114 shares, 2674 shares and 4250 shares for LTTS scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.



38. It is also noted that there were no relevant price-sensitive corporate announcements made by the company around the time of recommendation, which could justify the sudden rise in price and volume in the scrip of LTTS.

39. Investigation revealed that Sanjiv Bhasin made calls to Rajiv Kapoor before placement of buy orders in the account of Venus and instructed Rajiv to place orders. Further, he made calls to Rajiv Kapoor pursuant to the recommendations made on Zee News being broadcasted at 13:33 PM to place sell orders in the scrip and square off the positions taken earlier in the day, which were contrary to his recommendation given on Zee News.

39.1 The details of the trades done in the account of Venus are as follows:

Table 29

| Date and Recommendation time - Jan 11, 2022, 13:33<br>(Contract- LTTS22JANFUT) |            |                 |               |               |                |                      |                   |               |               |                |                      |
|--------------------------------------------------------------------------------|------------|-----------------|---------------|---------------|----------------|----------------------|-------------------|---------------|---------------|----------------|----------------------|
| Client Name                                                                    | PAN        | Buy (First Leg) |               |               |                |                      | Sell (Second Leg) |               |               |                |                      |
|                                                                                |            | Order Time      | Trade Time    | Average Price | Trade Quantity | Total Value Traded ₹ | Order Time        | Trade Time    | Average Price | Trade Quantity | Total Value Traded ₹ |
| Venus                                                                          | AAACV4306R | 09:56 - 12:49   | 09:56 - 12:49 | 5641.8        | 3800           | 21438880             | 13.36 - 13.38     | 13.36 - 15.22 | 5677.79       | 3800           | 21,575,600           |

39.2 During investigation, evidence was collected about the phone calls between Sanjiv Bhasin and Rajiv Kapoor. The summary of phone calls exchanged between Noticee No. 1 and Noticee No. 5 during the recommendation day w.r.t the scrip LTTS is tabulated below:

Table 30

| Sr. No.                                                   | Time     | Instruction of Sanjiv to Rajiv (based on the content of the call) |
|-----------------------------------------------------------|----------|-------------------------------------------------------------------|
| First Call                                                | 09:55 AM | Buy LTTS                                                          |
| Second Call                                               | 09:56 AM | Sell LTTS                                                         |
| Third Call                                                | 12:42 PM | Buy LTTS                                                          |
| Fourth Call                                               | 12:47 PM | Buy LTTS                                                          |
| Fifth Call                                                | 12:50 PM | Buy LTTS                                                          |
| <b>Recommendation on ZEE Business TV Channel at 13:33</b> |          |                                                                   |
| Sixth Call                                                | 13:36    | Sell LTTS                                                         |



**39.3** The detailed transcript of first conversation exchanged between Sanjiv Bhasin and Rajiv Kapoor for the said instance at 09:55 AM is as under:

*“Sanjiv Bhasin – Rajiv LTTS Dekhiyo*

*Rajiv – 5650 – 5610.....*

*.....*

*Sanjiv Bhasin – 65 karke 1000 lele*

*Rajiv – Aa gaye*

*Sanjiv Bhasin – Kya Average hain*

*Rajiv – 5660.48*

*Sanjiv Bhasin – 5660.48 main 1000 LTTS*

*Rajiv – Hanji*

*Sanjiv Bhasin – Theek Hain Rajiv”*

**39.4** On a bare perusal of the above conversation, it is revealed that the *Noticee No. 1* first enquired the price of scrip LTTS Futures from the *Noticee No. 5* and then instructed him to buy 1000 shares (5 lots; 1 lot equivalent to 200 shares) of LTTS at the limit price of ₹65 (which means ₹5665 per share). Subsequently, the *Noticee No.1* enquired the average acquisition price of shares bought from the *Noticee No. 5*, for which Rajiv informed that the average price of the shares bought was ₹5660.48 per share.

**39.5** Upon perusal of the trade log data obtained for the scrip day from NSE, it is observed that the *Noticee No. 5*, had placed a buy order in the future contract of LTTS scrip at 09:56, in the account of Venus through RRB Master, the details of which are as follows:



Table 31

| Date       | Buy Trading Member Name          | Buy Client Name          | Buy Client Pan | Buy Symbol | Buy_Instrument | Buy Order Date & Time | Buy Order Limit Price | Trade Date Time | Trade Qty | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|-----------------------|-----------------------|-----------------|-----------|-------------|
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 9:56       | 5665                  | 11/01/2022 9:56 | 200       | 5658.45     |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 9:56       | 5665                  | 11/01/2022 9:56 | 200       | 5658.5      |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 9:56       | 5665                  | 11/01/2022 9:56 | 200       | 5661.25     |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 9:56       | 5665                  | 11/01/2022 9:56 | 200       | 5661.3      |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 9:56       | 5665                  | 11/01/2022 9:56 | 200       | 5662.9      |
|            |                                  |                          |                |            |                |                       |                       | Total           | 1000      | 5660.48     |

**39.6** From the table above, it is clear that the *Noticee No. 5* had placed a buy order at 09:56, at a price of ₹5,665 per share for 1000 shares (05 lots), which exactly matches with the above instructions given by the *Noticee No.1* to *Noticee No. 5*. Moreover, the average traded price of ₹5,660.48 per share as per the above table matches with the reply (confirmation price) of *Noticee No. 5* to *Noticee No. 1*. It is clear that the *Noticee No. 5* executed the trades in the account of Venus as instructed by the *Noticee No. 1* on the call, as outlined above. In conclusion, at the end of the first call, the total bought quantity is 1000.

**39.7** The detailed transcript of second conversation exchanged between Sanjiv Bhasin and Rajiv Kapoor for the second leg of sell instance at 09:56 AM is as under:

*“Sanjiv Bhasin – Rajiv 5708-5713 main dal de iski selling, theek hain  
Rajiv – 5708-13 theek hain  
Sanjiv Bhasin – haan theek hain  
Rajiv – theek hain”*

**39.8** From the above call, it is clear that after buying shares, the *Noticee No. 1* informed the *Noticee No.5* to place sell order in the range of ₹5708 – 5713 and the *Noticee No. 5* acknowledged the instructions. Upon perusal of the order log subsequent to this call, it is observed that as instructed by the *Noticee No.1*, *Noticee No. 5* had placed sell orders for 1000 shares (600 shares at ₹5708 and 400 shares at ₹5713). As the last traded price was lower than the sell order limit price, the sell orders were not



executed. Since no sell orders were executed, total quantity remained same as 1000 shares (5 lots). The order log data is provided below:

Table 32

| Sell Order Date                           | Sell Order Time | Sell Client Name         | Sell Order no.   | Sell order original Vol | Sell order limit price | Sell LTP prior to order entry | Trade no.* |
|-------------------------------------------|-----------------|--------------------------|------------------|-------------------------|------------------------|-------------------------------|------------|
| 11/01/2022                                | 09:57:09        | VENUS PORTFOLIOS PVT LTD | 1500000008106820 | 600                     | 5708                   | 5655.05                       | NULL       |
| 11/01/2022                                | 09:57:14        | VENUS PORTFOLIOS PVT LTD | 1500000008119910 | 400                     | 5713                   | 5655.05                       | NULL       |
| *NULL - Indicates non-execution of trades |                 |                          |                  |                         |                        |                               |            |

**39.9** The detailed transcript of third conversation exchanged between Sanjiv Bhasin and Rajiv Kapoor for the buy instance at 12:42 PM is as under:

*“Rajiv - Hello*

*Sanjiv Bhasin - LTTS Dekhiyo.....40 Karke 5 lot aur lelo....*

*Rajiv – Ek reh gaya sir*

*Sanjiv Bhasin – Aa gaye Rajiv*

*Rajiv – Ek reh gaya sir*

*Sanjiv – ok”*

**39.10** From the above call, it is clear that the *Noticee No. 1* had already bought the Future contracts of scrip LTTS. Thereafter, the *Noticee No. 1* first enquired the price of Future contracts of scrip LTTS from *Noticee No. 5* and then instructed him to buy further 5 lots of LTTS. From a perusal of the trade data of LTTS as provided by NSE, it can be seen that the trade quantity and time of the trades exactly match with the contents of the aforesaid transcript. After the end of third call, the total bought quantity became 2000. The order log data is provided below:

Table 33

| Date       | Buy Trading Member Name          | Buy Client Name          | Buy Client Pan | Buy Symbol | Buy Instrument | Buy Order Date & Time | Buy Order Limit Price | Trade Date Time  | Trade Qty | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|-----------------------|-----------------------|------------------|-----------|-------------|
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:42      | 5640                  | 11/01/2022 12:42 | 200       | 5639        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:42      | 5640                  | 11/01/2022 12:42 | 200       | 5639        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:42      | 5640                  | 11/01/2022 12:42 | 200       | 5640        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:42      | 5640                  | 11/01/2022 12:42 | 200       | 5640        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:42      | 5640                  | 11/01/2022 12:42 | 200       | 5640        |
|            |                                  |                          |                |            |                |                       |                       | Total            | 1000      | 5640        |



**39.11** The detailed transcript of fourth conversation exchanged between Sanjiv Bhasin and Rajiv Kapoor for the buy instance at 12:47 PM is as under:

*“Rajiv – Yes sir*

*Sanjiv– 2 lot 32 main dal de bhai....*

*Rajiv – aa gaye*

*Sanjiv– 2 aur le 32 main ....2 dal de 30.5 main .....Aur 3 dal de 28.5 main.....Kitne aaye Rajeev*

*Rajiv – Sir, total ho gaya hain 2600*

*Sanjiv – 400 aur nahin aaye kya*

*Rajiv – Wo nahin aaye*

*Sanjiv - Fut*

*Rajiv - Sir, rate hi bohat tez ho gaye hain*

*Sanjiv – Chal 35 main Lage hain.... aur 32 main lage hain*

*Rajiv - 35 main lage hain, 30.50 main lage hain aur 32.50 main lage hain*

*Sanjiv – Theek hain Rajiv ok*

*Rajiv – 1200 hain..”*

**39.12** From the above, it is clear that the *Noticee No. 1* had initially instructed *Noticee No. 5* to place buy orders for 2 lots @ 32 which meant to buy at ₹5,632 per share. Subsequently, the *Noticee No. 1* instructed *Noticee No. 5* to buy another 2 lots @ 32 which meant ₹5632 per share, then 2 lots @30.50 which meant ₹5,630.50 per share and further 3 lots @ 28.50 which meant ₹5,628.50 per share. Further, the *Noticee No. 1* instructed *Noticee No. 5* to revise the last pending order price to 35 which meant ₹5,635 per share. Subsequently, the *Noticee No. 5* confirmed that the pending buy orders were standing @32, @30.50 and @35 which meant, ₹5,632, ₹5630.50 and ₹5,635 per share. After the end of the fourth call, the total bought quantity became 3800. The instructions given by the *Noticee No. 1* to *Noticee No. 5* to place aforementioned orders in the scrip of LTTS Future can be seen in the order log data given below:



Table 34

| Buy Order Date | Buy Order Time | Buy Client Name          | Buy Order no.    | Buy order original Vol | Trade Quantity | Buy order limit price | Buy LTP prior to order entry | Trade no. *       |
|----------------|----------------|--------------------------|------------------|------------------------|----------------|-----------------------|------------------------------|-------------------|
| 11/01/2022     | 12:47:45       | VENUS PORTFOLIOS PVT LTD | 1500000032838810 | 400                    | 0              | 5632                  | 5635                         | NULL              |
| 11/01/2022     | 12:47:46       | VENUS PORTFOLIOS PVT LTD | 1500000032838810 | 400                    | 200            | 5632                  | 5635                         | 20220111500208100 |
| 11/01/2022     | 12:47:46       | VENUS PORTFOLIOS PVT LTD | 1500000032838810 | 400                    | 200            | 5632                  | 5635                         | 20220111500208100 |
| 11/01/2022     | 12:47:53       | VENUS PORTFOLIOS PVT LTD | 1500000032855220 | 400                    | 0              | 5632                  | 5632                         | NULL              |
| 11/01/2022     | 12:48:00       | VENUS PORTFOLIOS PVT LTD | 1500000032855220 | 400                    | 200            | 5632                  | 5632                         | 20220111500208200 |
| 11/01/2022     | 12:48:10       | VENUS PORTFOLIOS PVT LTD | 1500000032890960 | 400                    | 0              | 5630.5                | 5632                         | NULL              |
| 11/01/2022     | 12:48:17       | VENUS PORTFOLIOS PVT LTD | 1500000032903910 | 600                    | 0              | 5628.5                | 5632                         | NULL              |
| 11/01/2022     | 12:48:51       | VENUS PORTFOLIOS PVT LTD | 1500000032903910 | 600                    | 0              | 5635                  | 5632                         | NULL              |
| 11/01/2022     | 12:49:56       | VENUS PORTFOLIOS PVT LTD | 1500000032903910 | 600                    | 200            | 5635                  | 5632                         | 20220111500209200 |
| 11/01/2022     | 12:49:56       | VENUS PORTFOLIOS PVT LTD | 1500000032903910 | 600                    | 200            | 5635                  | 5632                         | 20220111500209200 |
| 11/01/2022     | 12:49:56       | VENUS PORTFOLIOS PVT LTD | 1500000032903910 | 600                    | 200            | 5635                  | 5632                         | 20220111500209200 |
| 11/01/2022     | 12:49:56       | VENUS PORTFOLIOS PVT LTD | 1500000032855220 | 400                    | 200            | 5632                  | 5632                         | 20220111500209200 |
| 11/01/2022     | 12:49:56       | VENUS PORTFOLIOS PVT LTD | 1500000032890960 | 400                    | 200            | 5630.5                | 5632                         | 20220111500209200 |
| 11/01/2022     | 12:49:56       | VENUS PORTFOLIOS PVT LTD | 1500000032890960 | 400                    | 200            | 5630.5                | 5632                         | 20220111500209200 |

\*NULL - Indicates non-execution of trades

**39.13** Further, to verify the execution of orders as instructed by the *Noticee No. 1*, trade log of LTTS Future was also analysed for that day. Upon perusal of the same, it is observed that details as instructed by the *Noticee No. 1* to the *Noticee No. 5* is also reflected in the trade logs as follows:

Table 35

| Date       | Buy Trading Member Name          | Buy Client Name          | Buy Client Pan | Buy Symbol | Buy_Instrument | Buy Order Date & Time | Buy Order Limit Price | Trade Date Time  | Trade Qty | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|-----------------------|-----------------------|------------------|-----------|-------------|
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:47      | 5632                  | 11/01/2022 12:47 | 200       | 5632        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:47      | 5632                  | 11/01/2022 12:47 | 200       | 5632        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:48      | 5632                  | 11/01/2022 12:48 | 200       | 5632        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:49      | 5635                  | 11/01/2022 12:49 | 200       | 5635        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:49      | 5635                  | 11/01/2022 12:49 | 200       | 5635        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:49      | 5635                  | 11/01/2022 12:49 | 200       | 5635        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:49      | 5632                  | 11/01/2022 12:49 | 200       | 5632        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:49      | 5630.5                | 11/01/2022 12:49 | 200       | 5630.5      |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | LTTS       | FUTSTK         | 11/01/2022 12:49      | 5630.5                | 11/01/2022 12:49 | 200       | 5630.5      |
| Total      |                                  |                          |                |            |                |                       |                       |                  | 1800      | 5633        |

**39.14** The detailed transcript of the fifth conversation exchanged between Sanjiv Bhasin and Rajiv Kapoor for the buy instance at 12:50 PM is as under:

*“Rajiv - Hello*

*Sanjiv – Aa Gaye Rajiv....Kitne Hue.....Kitne ho gaye...*

*Rajiv – Ye ho gaye....3800...5641.81*

*Sanjiv – 3800 go haye.....200 aur le le...abhi le le 15 main.....18 karde*

*Rajiv*

*Rajiv – Aacha ji .....8 -8 Rupee ka to gap hain, 10-10 rupee ka*





*Sanjiv – Chal ....Kitne aa gaye....Chal Rehn de .....Jitne aa gaye utne rehn de.....3800 ho gaye hamare.....*

*Rajiv – Haan*

*Sanjiv - Kya average hain.....*

*Rajiv – ₹5641.81*

*Sanjiv – 41.81 ki average hain na*

*Rajiv – Hann....Wo 200 hata du*

*Sanjiv – Han hata de*

*Rajiv – Hata di sir*

*Sanjiv – Theek hain.... abhi selling tu bicha diyo 88 se le ke 5700 tak*

*Rajiv – Thik hain sir*

*Sanjiv – 5688 se le kar 5700 tak ...thik hain*

*Rajiv – Thik hain sir*

*Sanjiv – Mane 400 – 400 kar ke dal diyo...theek hain*

*Rajiv – theek hain*

*Sanjiv – theek hain, Rajiv*

*Rajiv – Theek hain sir*

*Sanjiv – 87 se 5700 tak....*

*Rajiv – Theek hain sir*

*Sanjiv – Aur mujhe bhav bata de Apollo tyre ka*

*Rajiv – 232 pe 85 aur 33*

*Sanjiv – Theek hain Rajiv....ok*

*Rajiv – Ok”*

**39.15** From the above, it is clear that the *Noticee No. 1* called *Noticee No. 5* at 12:50 and instructed him to place additional buy orders in the scrip of LTTS Future for 200 shares at ₹5615, however, he later instructed *Noticee No. 5* to modify it to ₹5618. For this, the *Noticee No. 5* informed to *Noticee No. 1* that the price gap between the current market price and the order price is in the range of ₹8-10. Then, the *Noticee No. 1* informed *Noticee No. 5* to cancel the pending buy order. The same can be verified





through the order log data as shown below since none of the trades were executed:

Table 36

| Buy Order Date                            | Buy Order Time | Buy Client Name          | Buy Order no.    | Buy order original Vol | Buy order limit price | Buy LTP prior to order entry | Trade no.* |
|-------------------------------------------|----------------|--------------------------|------------------|------------------------|-----------------------|------------------------------|------------|
| 11/01/2022                                | 12:50:55       | VENUS PORTFOLIOS PVT LTD | 1500000033232510 | 200                    | 5615                  | 5613.3                       | NULL       |
| 11/01/2022                                | 12:51:11       | VENUS PORTFOLIOS PVT LTD | 1500000033232510 | 200                    | 5618                  | 5613.3                       | NULL       |
| 11/01/2022                                | 12:51:41       | VENUS PORTFOLIOS PVT LTD | 1500000033232510 | 200                    | 5618                  | 5613.3                       | NULL       |
| *NULL - Indicates non-execution of trades |                |                          |                  |                        |                       |                              |            |

**39.16** Thereafter, the *Noticee No. 1* asked *Noticee No. 5* to provide the average price of shares bought, to which the *Noticee No. 5* informed him that he had bought 3800 shares of LTTS Future at an average price of ₹5641.81 per share. It is also clear from the above conversation that as soon as the buy order was completed, the *Noticee No. 1* instructed *Noticee No. 5* to place sell orders (limit orders) in the range of ₹5688 to ₹5700. The same was done as can be seen from the log data below:

Table 37

| Sell Order Date                           | Sell Order Time | Sell Client Name         | Sell Order no.   | Sell order original Vol | Sell order limit price | Sell LTP prior to order entry | Trade no.* |
|-------------------------------------------|-----------------|--------------------------|------------------|-------------------------|------------------------|-------------------------------|------------|
| 11/01/2022                                | 13:10:00        | VENUS PORTFOLIOS PVT LTD | 1500000008119910 | 400                     | 5713                   | 5655.05                       | NULL       |
| 11/01/2022                                | 13:10:03        | VENUS PORTFOLIOS PVT LTD | 1500000008106820 | 600                     | 5708                   | 5655.05                       | NULL       |
| 11/01/2022                                | 13:10:18        | VENUS PORTFOLIOS PVT LTD | 1500000035588730 | 400                     | 5688                   | 5637.95                       | NULL       |
| 11/01/2022                                | 13:10:36        | VENUS PORTFOLIOS PVT LTD | 1500000035634020 | 400                     | 5690                   | 5638                          | NULL       |
| 11/01/2022                                | 13:10:42        | VENUS PORTFOLIOS PVT LTD | 1500000035651760 | 400                     | 5692                   | 5638                          | NULL       |
| 11/01/2022                                | 13:10:46        | VENUS PORTFOLIOS PVT LTD | 1500000035658920 | 400                     | 5694                   | 5638                          | NULL       |
| 11/01/2022                                | 13:10:51        | VENUS PORTFOLIOS PVT LTD | 1500000035671740 | 400                     | 5696                   | 5638                          | NULL       |
| 11/01/2022                                | 13:10:59        | VENUS PORTFOLIOS PVT LTD | 1500000035686730 | 400                     | 5698                   | 5638                          | NULL       |
| 11/01/2022                                | 13:11:03        | VENUS PORTFOLIOS PVT LTD | 1500000035695800 | 400                     | 5700                   | 5638                          | NULL       |
| 11/01/2022                                | 13:11:42        | VENUS PORTFOLIOS PVT LTD | 1500000035770320 | 400                     | 5687                   | 5634                          | NULL       |
| 11/01/2022                                | 13:12:00        | VENUS PORTFOLIOS PVT LTD | 1500000035817710 | 200                     | 5691                   | 5634                          | NULL       |
| 11/01/2022                                | 13:12:07        | VENUS PORTFOLIOS PVT LTD | 1500000035843220 | 200                     | 5695                   | 5634                          | NULL       |
| 11/01/2022                                | 13:12:12        | VENUS PORTFOLIOS PVT LTD | 1500000035861950 | 200                     | 5697                   | 5634                          | NULL       |
| *NULL - Indicates non-execution of trades |                 |                          |                  |                         |                        |                               |            |

**39.17** Upon instructing the *Noticee No. 5* for placing sell orders in the scrip, the *Noticee No. 1* appeared on the Media Channel at 13:33 PM and recommended to the viewers to buy the scrip LTTS for a target of ₹5800 per share for a long term perspective with a stop loss of ₹5520 per share.



It is pertinent to note that the Current Market Price (**CMP**) at the time of recommendation was ₹5,644.80 per share (refer to screen shot above ([Figure 3](#))).

**39.18** Thereafter, post the recommendation on the News Channel, the *Noticee* No. 1 made a phone call to *Noticee* No. 5 at 13:36 PM for the second leg of sell instance in the LTTS scrip. The detailed transcript is as under:

*“Rajiv – Wo to bik gaye Apollo tyres....70-72 aa rahe hain LTTS*

*Sanjiv – Thik hain ....tune laga rakhein hain 87 and above*

*Rajiv – Aab maine 87 se lekar 5700 tak*

*Sanjiv – Haan to Jo tera highest ha na wo 75 aur 77 main dekh kar 1000 bech de....200-200 kar ke..*

*Rajiv – Theek hain*

*Sanjiv – Jo highest cancel kar de.....aur dekh kar 75 – 77 main 1000 bech de...*

*Rajiv – Theek hain*

*Sanjiv – Ya ruk ja 84 ho gaya.....80 and above bech de 1000 ke....200-200 daliyo Rajiv*

*Rajiv – Theek hain sir...Theek hain sir*

*Sanjiv – Aa hi gaya...kar de kar de 84 par.....84 main 1000 bech de Rajiv.....Bik gaya*

*Rajiv – 700 bike hain aabhi*

*Sanjiv – 800 bik gaye*

*Rajiv – 400 -400*

*Sanjiv – Ok ... Dekh kar de 600 aur*

*Rajiv – Bik rahe hain*

*Sanjiv – 1000 aur karde bhai*

*Rajiv – 1000 ho gaye*

*Sanjiv – 1000 aur karde dekh ke beta....80 and above*

*Rajiv – niche aaya*

*Sanjiv – 80 – 81 – 82 main bicha de..... Bike aur.....Bik gaye aur*



*Rajiv – haan bik rahe hain sir.....1600 reh gaye mere...*

*Sanjiv – Bas*

*Rajiv – Hanji*

*Sanjiv – 2200 bik gaye na*

*Rajiv – Hanji*

*Sanjiv – Chal 1600 tu karde.....kya bhav laga rakhein hain.....upar ke sabh cancel kar diye na....*

*Rajiv – sare cancel kar diye*

*Sanjiv – Ab bas 1600 reh gaye*

*Rajiv – 1600 reh gaye*

*Sanjiv – 4-80 main dal 4-82 main dal de...Chal ye bhi dekh ke kar de*

*Rajiv .....sulta de....Kitne ke bik gaye*

*Rajiv – Ye 80 wale to bik gaye*

*Sanjiv – Kitne reh gaye*

*Rajiv – 1200*

*Sanjiv – 82 aur 84 main laga de.....82-83-84 main laga de....theek hain*

*Rajiv....*

*Rajiv – Theek hain Theek hain”*

**39.19** In the aforesaid transcript, the *Noticee No. 1* first enquired *Noticee No. 5*, whether he had already placed the sell orders at the price of ₹5687 or above. To this, the *Noticee No. 5* replied that all the orders in the scrip were standing at the price between ₹5687 – ₹5700. The same is reflected in the order log data provided in the preceding paras at Table 37. Thereafter, the *Noticee No. 1* instructed *Noticee No. 5* to revise all the pending sell orders placed at highest rates, to ₹5675-5677 and sell 1000 shares in the quantity range of 200-200 each.

**39.20** Due to the effect of the recommendations of the *Noticee No.1*, as the rates started surging upwards to ₹5684, the *Noticee No. 1* first asked *Noticee No. 5* to wait and then instructed him to sell 1000 shares (in the quantity range of 200-200 each) at a price exceeding ₹5680. It is



pertinent to mention here that the *Noticee No. 5* followed all the instructions being given by the *Noticee No. 1* to him before and immediately after the recommendation given at 13:33 PM. As the momentum in the scrip continued, the *Noticee No. 1* then informed *Noticee No. 5* to revise the order and sell 1000 shares at a price exceeding ₹5684.

**39.21** Afterwards, when the price fell, the *Noticee No. 1* instructed *Noticee No. 5* to place sell orders in the range of ₹5680-5681-5682. During the call, it is seen that the *Noticee No. 5* confirmed that 2200 shares were sold and for the remaining 1600 shares, the *Noticee No. 1* instructed *Noticee No. 5* to place sell orders (4 Lots (800 shares)) at the price of ₹5680 and 4 Lots (800 shares) at the price of ₹5682). Subsequently, order placed at the price of ₹5680 got executed and the shares were sold (400 shares). For the remaining 1200 shares, the *Noticee No. 1* asked *Noticee No. 5* to place sell order in the range of ₹5682-5683-5684. It is observed that details of trade quantity and price in the account of Venus is exactly matching with the transcript of call conversation between *Noticee No. 1* and *Noticee No. 5*. As per the trade and order log details shown below, 2600 shares were sold in the price range of ₹5680 – 5684 between 13:36 – 13:38 and 1200 shares were sold at the price of ₹5668 afterwards between 15:21 – 15:22.



Table 38

| Date       | Sell Trading Member Name         | Sell Client Name         | Sell Client Pan | Sell Symbol | Sell Instrument | Sell Order Date & Time | Sell Order Limit Price | Trade Date Time  | Trade QTY | Trade Price |
|------------|----------------------------------|--------------------------|-----------------|-------------|-----------------|------------------------|------------------------|------------------|-----------|-------------|
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:36       | 5684                   | 11/01/2022 13:36 | 200       | 5684        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:37       | 5684                   | 11/01/2022 13:37 | 200       | 5684        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:37       | 5684                   | 11/01/2022 13:37 | 200       | 5684        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:37       | 5684                   | 11/01/2022 13:37 | 200       | 5684        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:37       | 5684                   | 11/01/2022 13:37 | 200       | 5684        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:37       | 5680                   | 11/01/2022 13:37 | 400       | 5680        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:38       | 5682                   | 11/01/2022 13:38 | 200       | 5682        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:38       | 5682                   | 11/01/2022 13:38 | 200       | 5682        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:38       | 5683                   | 11/01/2022 13:38 | 400       | 5683        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:38       | 5680                   | 11/01/2022 13:38 | 200       | 5680        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 13:38       | 5680                   | 11/01/2022 13:38 | 200       | 5680        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 15:21       | 5668                   | 11/01/2022 15:21 | 200       | 5668        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 15:21       | 5668                   | 11/01/2022 15:21 | 200       | 5668        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 15:22       | 5668                   | 11/01/2022 15:22 | 400       | 5668        |
| 11/01/2022 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | LTTS        | FUTSTK          | 11/01/2022 15:22       | 5668                   | 11/01/2022 15:22 | 400       | 5668        |
|            |                                  |                          |                 |             |                 |                        |                        | Total            | 3800      | 5678.6      |

**39.22** For the sake of clarity, a table detailing calls that took place between the *Noticee No. 1* and *Noticee No. 5* and orders placed thereafter, are given below:

Table 39

| Call Time | Order Time | Particulars                                                                                                                       | Shares Inventory |
|-----------|------------|-----------------------------------------------------------------------------------------------------------------------------------|------------------|
| 09:55     |            | Sanjiv Bhasin instructed Rajiv Kapoor to buy 1000 shares (05 lots) of LTTS @ 65 (means ₹5665)                                     | -                |
|           | 09:56      | Venus bought 5 Lots - 1000 shares of LTTS Scrip the avg. price of ₹5660.48 per share                                              | 1000             |
| 09:56     |            | Sanjiv Bhasin instructed Rajiv Kapoor to place sell order of shares bought. However, as per the Order log, no order was executed. | -                |
| 12:42     |            | Sanjiv Bhasin instructed Rajiv Kapoor to buy 5 lots @ ₹40                                                                         |                  |
|           | 12:42:31   | Rajiv Kapoor placed buy order of 5 lots @ ₹5640 and bought 1000 shares at average price of ₹5639.60                               | 1000+1000= 2000  |
| 12:47     |            | Sanjiv Bhasin to Rajiv Buy 2 lots @32                                                                                             |                  |
|           | 12:47:45   | Rajiv placed buy order of 2 lots @₹5632 and bought 400 shares @5632 each                                                          | 2000+400 =2400   |
|           |            | Sanjiv Bhasin to Rajiv Buy another 2 lots @32                                                                                     |                  |
|           | 12:47:53   | Rajiv placed buy order of 2 lots @5632 and bought 400 shares                                                                      | 2400+400= 2800   |
|           |            | Sanjiv Bhasin to Rajiv Buy another 2 lots @30.50                                                                                  |                  |
|           | 12:48:10   | Rajiv placed buy order of 2 lots @5630.50 and bought 400 shares @ 5630.50                                                         | 2800+400= 3200   |
|           |            | Sanjiv Bhasin to Rajiv Buy another 3 lots @28.50. As the price went up, Sanjiv Bhasin asked Rajiv to revised the price to 35      |                  |
|           | 12:48:51   | Rajiv first placed buy order of 3 lots @₹5628.50 later revised the same to 5635 and bought 600 shares @ ₹5635.                    | 3200+600= 3800   |

*Interim Order in the matter of stock recommendations given by Sanjiv Bhasin in Media Channels and other social media platforms*



| Call Time | Order Time                | Particulars                                                                                                                                                                                                                                               | Shares Inventory   |
|-----------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| 12:50     |                           | Sanjiv Bhasin instructed Rajiv Kapoor to place buy orders for 200 shares at price of ₹5615 & ₹5618. However, as per the Order log no buy order was executed at this price range.<br>At last, Rajiv confirms that Average price of 3800 shares is ₹5641.81 | -                  |
| 13:36     |                           | Sanjiv Bhasin instructed Rajiv Kapoor to place sell order at various prices and also instructed him to revised the price as per the prevailing market price of the scrip.                                                                                 |                    |
|           | 13:36:59<br>-<br>13:38:39 | Rajiv placed orders to sell 2600 shares. Shares sold at average price of ₹5682.31                                                                                                                                                                         | 3800 – 2600 = 1200 |
|           | 15:21:14<br>–<br>15:22:44 | Rajiv Placed orders to sell remaining 1200 shares. Shares sold at average price of ₹5668.                                                                                                                                                                 | Nil                |
|           |                           | All the 3800 shares were sold at average price of ₹5677.79<br>Profit (Average sell price ₹5677.79 – average buy price ₹5641.81) * quantity 3800 = Profit ₹136724 approx.                                                                                  |                    |

**39.23** From the aforementioned transcripts of call conversations, it is clear that prior to and post the recommendations on news channel given by the *Noticee No. 1* at 13:33 PM, he had called *Noticee No. 5*, and traded in the account of Venus by placing orders through him. It may be noted that despite not being a client of RRB Master, the *Noticee No. 1* was in constant touch/contact with dealer of RRB Master viz. the *Noticee No. 5* through phone calls, for placing the trade orders in the account of Venus, in the scrip of LTTS, which was recommended to the viewers for long term perspective.

**39.24** On a perusal of the transcripts of calls coupled with the trades carried out as per the instructions of the *Noticee No.1* given to *Noticee No. 5* it can be reasonably, *prima facie*, inferred that the *Noticee No. 1* carried out first Leg of transaction, *i.e.* buy trades in the LTTS scrip between 09:56 AM to 12:49 PM, prior to his recommendation on Business channel, at an average price of ₹5641.80 per share. Thereafter, the *Noticee No. 1* appeared on the Zee Business Channel around 13:33 PM and recommended the viewers to buy LTTS scrip at ₹5,800 per share when the CMP was ₹5,644.90 with a long term perspective and with a difference in price (higher) of ₹156 per share from the CMP. Pursuant to



the recommendation given at 13:33 PM, the scrip saw significant impact on the price and volume of the scrip.

**39.25** The *Noticee No. 1* utilised this momentum and instructed *Noticee No. 5* to place sell trades thereby making a profit of ₹1.36 lacs by carrying out *prima facie* fraudulent trades, i.e. contrary to his own recommendations on channel. Thus, the *Noticee No. 1* *prima facie* deceived investors/public who had followed his recommendation by creating a contrary position to his own recommendation in the scrip of LTTS.

**40.** Investigation further revealed that certain entities viz. *Noticee No. 3*, *Noticee No. 5*, *Noticee No. 6* and *Noticee No. 11*, related/connected to RRB Master/*Noticee No. 1*, and aware of the modus operandi of his trading, also traded and carried out similar fraudulent trades in their respective accounts. As per the trade log made available, the trading member details along with the respective dealer name and their CTCL ID, through which order(s) were placed of the above entities are given as under:

Table 40

| Broker wise order placement details |                           |                 |              |
|-------------------------------------|---------------------------|-----------------|--------------|
| Client Name                         | Trading Member Name       | CTCL_ID         | Dealer Name  |
| Ashish Kapur                        | RRB Master                | 110034002006110 | Rajiv Kapoor |
| Jagat Singh                         | Zerodha Broking Ltd.      | 111111111111100 | IBT          |
| LEO                                 | RRB Master                | 110034002006110 | Rajiv Kapoor |
| Rajiv Kapoor                        | SMC Global securities Ltd | 333333333333110 | IBT          |
| Venus                               | RRB Master                | 110001001005110 | Dealer 1     |

**40.1** The *Noticee No. 5* being privy to the orders of *Noticee No. 1* by being in constant touch with the *Noticee No. 1* over calls, upon placing orders in the account of Venus at 09:56, as instructed by the *Noticee No. 1*, also placed a similar type of trade in his personal trading account in the scrip of LTTS using Internet based trading. He placed two buy orders of LTTS Future (containing 400 shares) at 09:57 AM and 12:08 PM, and



subsequently, placed two limit sell orders of LTTS Future (containing 400 shares) each at 10:20 AM and 13:35 PM. Further, from the perusal of the trade data, it is observed that out of 400 shares, 299 shares were sold at 10:20 AM and the remaining shares were sold at 13:35 PM. Accordingly, *Noticee No. 5* made a profit of ₹7,400.

**40.2** The *Noticee No. 6* was an employee of RRB Master since 2008. Investigation revealed that the *Noticee* clients of RRB Master were mapped with Dealer ID of *Noticee No. 6*, which allowed him to view the trades/orders of any client mapped to his Dealer ID. Accordingly, upon further examination, it was observed that the *Noticee No. 6* mirrored the trades of Venus. The *Noticee No. 6* misused the facility of having access to information of trades of other clients of the Trading member RRB Master, by virtue of being an employee, and he carried out trades in his own account by mirroring the trades of the *Noticee No. 1*, carried out in the account of Venus in the instant example by the *Noticee No. 5*. *Noticee No. 6* placed a total of five buy orders of LTTS Futures (Comprising 1000 shares cumulatively), and out of which, he placed two orders at 09:59 AM and the remaining three orders between 11:53 AM– 12:40 PM. Thereafter, emulating the pattern of trades in Venus, the *Noticee No. 6* placed five limit sell orders of LTTS Future (comprising 200 shares each, aggregate of 1000 shares), out of which, he had placed one sell order at 11:51 AM and remaining four sell orders between 13:34 PM– 13:37 PM. It is observed that out of total 1000 shares, 200 shares were sold at 11:52 AM and the remaining 800 shares were sold between 13:34 PM– 13:37 PM, within four minutes of the recommendation being made by *Noticee No. 1* on Media Channel. Accordingly, *Noticee No. 6* made a profit of ₹24,350

**40.3** It was also revealed during the investigation that *Noticee Nos. 3 and 11* also mirrored the trades placed in the account of Venus and made profit. It was found that *Noticee No. 3* had placed a buy order of LTTS Future





scrip for 200 shares at 10:03 AM and squared off the same at 13:37 PM, soon after the recommendations were made by the *Noticee No. 1* at 13:33 PM. Also, the *Noticee No. 11* had placed buy orders in the LTTS scrip between 10:04 AM to 12:49 PM for 600 shares and sold the entire quantity between 13:37 PM to 15:03 PM in the scrip. As per the statement of the *Noticee No. 3*, recorded during the investigation, on oath, it has been stated by him that on an ongoing basis, he used to authorize the dealers of RRB Master, viz. *Noticee Nos. 5 and 6* to place orders in the accounts of *Noticee Nos. 8 and 9*, on instructions of the *Noticee No. 1*. The scheme of placement of orders in the trading accounts of *Noticee Nos. 3 and 11* indicates that the *Noticee No. 3* was fully aware of the scheme of *Noticee No. 1* and also mirrored the same trades in his account through *Noticee No. 5*, dealer who placed orders for *Noticee No. 1* in the instant scrip. This pattern of placing mirrored trades further gets affirmed by the fact that in certain instances, the *Noticee No. 1* had enquired from *Noticee Nos. 5 and 6* when either of them was unavailable for placing orders, as to who would take care of the trades to be carried out by the *Noticee No. 1*, as already shown in preceding paras.

**40.4** The *Noticee No. 1* had placed buy orders in the account of Venus between 09:56 AM to 12:49 PM through *Noticee No. 5*. The *Noticee No. 3*, immediately thereafter, traded in the scrip in his account at 10:03 AM through Rajiv. Further, he also placed buy order in the scrip in the account of Leo between 10:04 AM to 12:49 PM. The proximity of these order timings amongst the *Noticees* clearly demonstrates that this was being done in a planned manner on the basis of recommendations being given by *Noticee No. 1*. Further, shares were sold in the account of Venus, in the scrip between 13:36 PM to 15:22 PM. Similarly, Ashish placed sell orders in the scrip at 13:37 PM and Leo between 13:37 PM to 15:03 PM, which was immediately after the recommendations aired on Media Channel. Accordingly, Leo and Ashish made a profit of ₹12,000 and ₹3,990, respectively.



**40.5** A brief analysis of trades carried out and further profits made by *Noticees*, as discussed hereinabove vis-à-vis recommendations given by the *Noticee No. 1*, is given in the table below:

Table 41

| Analysis of trades carried out by the clients in the scrip "LTTS"              |            |                     |                     |                      |                 |                      |                     |                      |               |                 |                      |                                               |          |
|--------------------------------------------------------------------------------|------------|---------------------|---------------------|----------------------|-----------------|----------------------|---------------------|----------------------|---------------|-----------------|----------------------|-----------------------------------------------|----------|
| Date and Recommendation time - Jan 11, 2022, 13:33<br>(Contract- LTTS22JANFUT) |            |                     |                     |                      |                 |                      |                     |                      |               |                 |                      |                                               |          |
| Client Name                                                                    | PAN        | Buy (First Leg)     |                     |                      |                 |                      | Sell (Second Leg)   |                      |               |                 |                      | Client Scrip Trade Val to all scrips trd val. | Profit ₹ |
|                                                                                |            | Order Time          | Trade Time          | Average Price (in ₹) | Traded Quantity | Total Value Traded ₹ | Order Time          | Trade Time           | Average Price | Traded Quantity | Total Value Traded ₹ |                                               |          |
| Venus                                                                          | AAACV4306R | 09:56<br>-<br>12:49 | 09:56<br>-<br>12:49 | 5641.8               | 3800            | 21438880             | 13:36<br>-<br>13:38 | 13:36<br>-<br>15:22  | 5677.79       | 3800            | 21,575,600           | 35.21%                                        | 136720   |
| LEO                                                                            | AAACL2384F | 10:04<br>-<br>12:49 | 10:04<br>-<br>12:49 | 5654                 | 600             | 3392400              | 13:37<br>-<br>15:03 | 13:37<br>-<br>15:03  | 5673          | 600             | 3404400              | 30%                                           | 12000    |
| Ashish Kapur                                                                   | AJPPK9522R | 10:03               | 10:04               | 5664                 | 200             | 1132800              | 13:37               | 13:37                | 5683.95       | 200             | 1136790              | 25%                                           | 3990     |
| Rajiv Kapoor                                                                   | ARSPK9663Q | 09:57<br>-<br>12:08 | 09:57<br>-<br>12:11 | 5649                 | 400             | 2259600              | 10:16<br>-<br>13:35 | 10:20<br>-<br>13:35  | 5668          | 400             | 2267000              | 35%                                           | 7400     |
| Jagat Singh                                                                    | BSRPS9870C | 09:59<br>-<br>12:40 | 10:00<br>-<br>12:40 | 5653                 | 1000            | 5653000              | 11:51<br>-<br>13:37 | 11:52<br>to<br>13:37 | 5677          | 1000            | 5677350              | 39%                                           | 24350    |

## F.2 Illustration of recommendation on IIFL Platform as a special stock pick- Parag Milk Foods Limited

**41.** It may be noted that the *Noticee No. 1*, apart from providing stock recommendations through TV/Media channels also provided recommendations through various platforms of IIFL. As informed by IIFL, the recommendations made by their Research Analysts, including *Noticee No. 1*, were broadcasted using publisher platforms like 'Yobee/Jamun', software/applications integrated with the trading applications of IIFL, and the recommendations given on Yobee platform were directly broadcasted to all the platforms such as IIFL Telegram



Channel namely IIFL Capital (previously 'IIFL Capital Research'), IIFL Trading terminals and IIFL Markets App. The Telegram channel referred herein was not exclusively for the clients of IIFL and it was open for general public also. Further, it has been observed that research reports of stock recommendations by the *Noticee No. 1* were circulated by IIFL to its employees and authorised persons of IIFL capital through emails.

42. Investigation revealed that the *Noticee No. 1*, on February 07, 2024 had recommended to buy the shares of Parag Milk Foods Limited. It was observed that the *Noticee No. 1* initially recommended Parag Milk Foods at 13:18 PM through Yobee platform, which in turn, was automatically broadcasted to IIFL Telegram Channel, IIFL Trading terminals and the IIFL Markets App. The snapshot of the recommendation as visible on IIFL Telegram Channel is as follows:

Table 42

| Snapshot of the recommendation                                                      | Remarks                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | As can be seen from the snapshot of the Official Telegram Channel of IIFL, Sanjiv Bhasin recommended to Buy ParagMilk at 13:18 PM on February 07, 2024.<br><br>"Buy PARAGMILK @ 210-220 with a target of 300 in 31 days. Stop Loss 202-Sanjiv Bhasin". |

43. The details of the recommendation given in the aforesaid Channel is given in the table below:

Table 43

| Date         | Scrip                                   | CMP  | Target Price | Stop Loss | Recommendation                       | Platform                                                |
|--------------|-----------------------------------------|------|--------------|-----------|--------------------------------------|---------------------------------------------------------|
| Feb 07, 2024 | Parag Milk Foods Limited ("PARAGMILK"). | ₹220 | ₹300         | ₹202      | Buy (Long term – 31 days) @ ₹210-220 | IIFL Telegram, IIFL Markets App, IIFL Trading terminals |



44. Investigation also revealed that the research report of *Noticee No. 1* in the scrip (PARAGMILK), Titled **“Sanjiv Bhasin Special Stock pick – Parag Milk Foods”**, was circulated by IIFL through its official email id (\*\*\*\*\*@iifl.com) to its various group emails such as \*\*\*\*\*@iifl.com, \*\*\*\*\*@iifl.com; \*\*\*\*\*@5paisa.com, \*\*\*\*\*@iifl.com, \*\*\*\*\*@iifl.com, \*\*\*\*\*@iifl.com, the email IDs of employees/authorised persons of IIFL. The email was forwarded at 14:22 PM. The recommendation details of the research report are as follows:

Table 44

| Date         | Scrip                                   | CMP  | Target Price | Stop Loss | Recommendation                   | Platform    |
|--------------|-----------------------------------------|------|--------------|-----------|----------------------------------|-------------|
| Feb 07, 2024 | Parag Milk Foods Limited (“PARAGMILK”). | ₹223 | ₹365         | ₹215      | Buy (Long term – 90 days) @ ₹215 | IIFL Emails |

45. The snapshot of the recommendation email through which the research report was disseminated can be seen below:

Figure 5

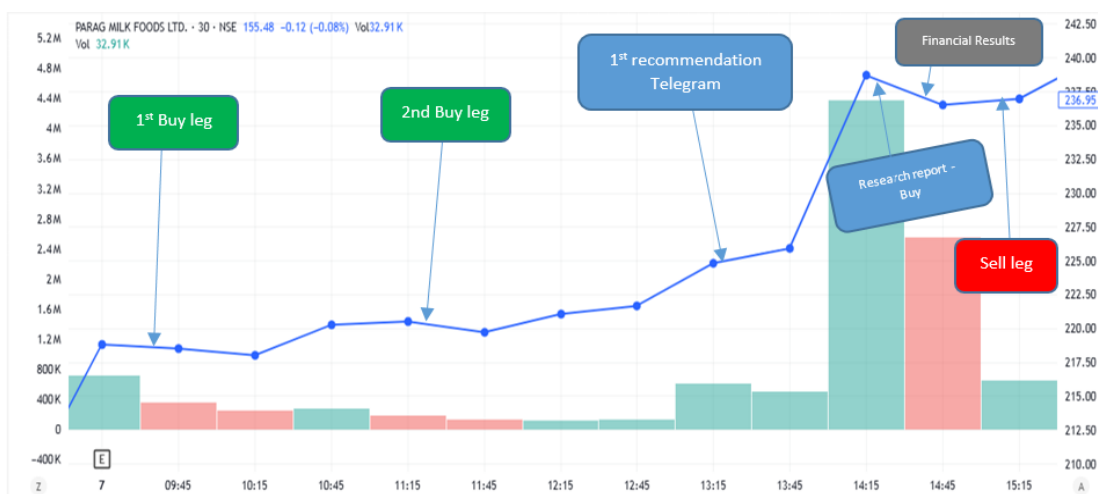


46. In the initial recommendation dated February 07, 2024 to buy shares of Parag Milk Foods, *Noticee No. 1* gave a target of ₹300 with and a stop loss of ₹202 with target duration of 31 days and now in the research report of same date Sanjiv Bhasin recommended to buy the shares of Parag Milk Foods (Scrip code: ‘PARAGMILK’) @ 215 with a target price of ₹365 with a target duration of 90



days. The price and volume chart of PARAGMILK on NSE during the day February 07, 2024 is given below:

Figure 6

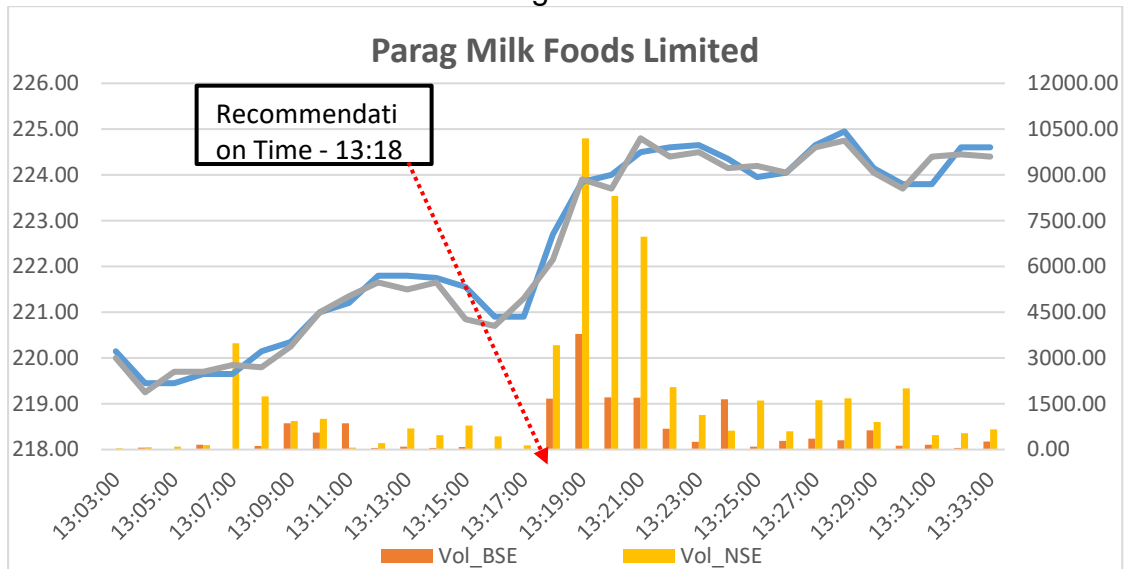


47. From a perusal of the price and volume chart of PARAGMILK on NSE during the day February 07, 2024, it can be seen that earlier, the volume was very negligible before the recommendation of the *Noticee No. 1* and subsequent to his recommendation, the price and the volume had shot up substantially. Further, it is pertinent to mention that on that day, Parag Milk had also announced Financial Results for the quarter ended December 2023 at 14:36 PM, however, it may be noted that the price of the scrip and volume had already increased substantially upon recommendation by the *Noticee No. 1* and prior to the dissemination of the Financial Results of Parag Milk which happened subsequently at 14:36 PM.

48. Impact of the recommendation on the Price and Volume of the scrip is shown in the following paragraphs. The price and volume chart, during 15 minutes pre and post the recommendation time (*i.e.* 13:18 PM) in the scrip of “PARAGMILK” in BSE Equity Cash segment, NSE equity cash segment was carried out, and can be seen below:



Figure 7



49. The details of the significant impact on the price and trading volume of the scrip, as observed in the above graph is depicted below:

Table 45

| Recommendation date                                                                               |                                                                                                                   | February 07, 2024                                                                                                                                                                     |          |
|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Recommendation time (t)                                                                           |                                                                                                                   | 13:18 PM                                                                                                                                                                              |          |
| Scrip/Contract Recommended                                                                        |                                                                                                                   | PARAGMILK                                                                                                                                                                             |          |
| Recommended Levels (For Cash)                                                                     | Recommended Price (₹)                                                                                             | 210-220                                                                                                                                                                               |          |
|                                                                                                   | Target Price (₹)                                                                                                  | 300                                                                                                                                                                                   |          |
|                                                                                                   | Stop Loss (₹)                                                                                                     | 202                                                                                                                                                                                   |          |
| Scrip/Contract                                                                                    |                                                                                                                   | Parag Milk Foods Limited                                                                                                                                                              |          |
|                                                                                                   |                                                                                                                   | BSE (EQ)                                                                                                                                                                              | NSE (EQ) |
| Price Impact Post Recommendation                                                                  | Average High/ Low Variation % in preceding 15 mins [t-15]                                                         | 0.09%                                                                                                                                                                                 | 0.21%    |
|                                                                                                   | Average High/ Low Variation % during recommendation time and succeeding 2 mins [t and t+2]                        | 0.52%                                                                                                                                                                                 | 0.67%    |
|                                                                                                   | Average High/ Low Variation % in succeeding 15 mins [t+15]                                                        | 0.25%                                                                                                                                                                                 | 0.39%    |
| Volume Impact Post Recommendation                                                                 | Avg Trading Vol in Preceding 15 mins [t-15] (number of shares/underlying shares)                                  | 195                                                                                                                                                                                   | 687      |
|                                                                                                   | Avg Trading Vol during recommendation time and succeeding 2 mins [t and t+2] (number of shares/underlying shares) | 2388                                                                                                                                                                                  | 7308     |
|                                                                                                   | Avg Trading Vol for succeeding 15 mins [t+15] (number of shares/underlying shares)                                | 856                                                                                                                                                                                   | 2674     |
| Relevant Price Sensitive Corporate Announcement on the day of the recommendation or the prior day |                                                                                                                   | There was a price sensitive announcement of Financial results on February 07, 2024, at <b>14:36 PM</b> . However, the alleged transactions were carried out before this announcement. |          |



**50.** The analysis of the price impact in the scrip shows the following:

- i. In the preceding 15 minutes before the recommendation, the average high/low price variation was relatively low at 0.09%, and 0.21% for PARAGMILK scrip at BSE (EQ), and NSE (EQ) respectively.
- ii. However, during the recommendation time and the subsequent 2 minutes (t and t+2), there was a significant surge in price volatility, with an average high/low variation of 0.52%, and 0.67% PARAGMILK scrip at BSE (EQ), and NSE (EQ) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average high/low variation stood at 0.25%, and 0.39% for PARAGMILK scrip at BSE (EQ), and NSE (EQ) respectively.

**51.** An analysis of the volume impact in the scrip shows the following:

- i. The average trading volume in the 15 minutes leading up to the recommendation (t-15) was 195 shares and 687 shares for PARAGMILK scrip at BSE (EQ) and NSE (EQ) respectively.
- ii. During the recommendation time and the following 2 minutes (t and t+2), the trading volume experienced a substantial increase, reaching an average of 2388 shares and 7308 shares for PARAGMILK scrip at BSE (EQ) and NSE (EQ) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average trading volume remained elevated at 856 shares and 2674 shares for PARAGMILK scrip at BSE (EQ) and NSE (EQ) respectively.

**52.** From examination of calls between Rajiv Kapoor and Sanjiv Bhasin, it is observed that there were calls between Rajiv and Sanjiv Bhasin on Feb 07, 2024 w.r.t scrip Parag Milk Food. It was observed that before making the said recommendation, Sanjiv Bhasin had made phone calls to Rajiv Kapoor, Praveen Gupta and Lalit Bhasin for placing buy orders in the scrip of Parag Milk Foods. Further, post the recommendation, he made phone calls to Lalit Bhasin for placing sell orders.



**52.1** Transcript of first phone call between Sanjiv Bhasin and Rajiv Kapoor on Feb 07, 2024 at 09:28:50 AM – (1st Buy leg)

*“Rajiv – Yes sir*

*Sanjiv Bhasin – Rajiv Indiabull or Parag milk ka bhaav bata de*

*Rajiv – Ji sir, bata raha hu”*

The call placed on hold

**52.2** From the above call, it is evident that Sanjiv Bhasin had enquired about the scrip price of Indiabulls and Parag Milk from Rajiv Kapoor and then it can be seen that the call was placed on hold by Sanjiv Bhasin.

**52.3** Upon analysis of the CDR records of February 07, 2024 of Sanjiv Bhasin (Ph: 981\*\*\*\*162), it is observed that Praveen Gupta (*Noticee No. 7*) (Ph: 981\*\*\*\*959) had called Sanjiv Bhasin at 09:29:20 AM and because of that Sanjiv Bhasin had placed the call with Rajiv Kapoor on hold.

**52.4** Transcript of second phone call between Sanjiv Bhasin and Rajiv Kapoor on Feb 07, 2024 at 09:37:24 AM – (1st Buy leg)

*“Sanjiv– Hello*

*Rajiv – Ha sir ye mai Indiabull bech raha hu aur Paragmilk le raha hu*

*Sanjiv– Ha bhayya abhi tak kuch kiya nahi inhone*

*Rajiv – Sir, wo phone ab aya mere paas Praveen ji se*

*Sanjiv – Are yaar tum kya \*\*\*\*\* kaam karoge ....wo banda bhi usko mein aadhe ganta pandhra minute se bol raha hu .... Aur kar ke karo jaldi kya bhaav hai dono*

*Rajiv – thik hai”*

**52.5** From the above, it is clear that Sanjiv Bhasin had called Rajiv Kapoor for a second time at 09:37 AM to confirm whether, as instructed by Sanjiv Bhasin to Praveen Gupta, shares of Indiabulls were sold and shares of Paragmilk scrip were purchased. To this, Rajiv replied that he received the information of trades to be carried out in the scrip Paragmilk and Indiabulls from Praveen just moments before and the orders were not yet placed. Upon hearing the reply of Rajiv Kapoor, Sanjiv Bhasin vented his



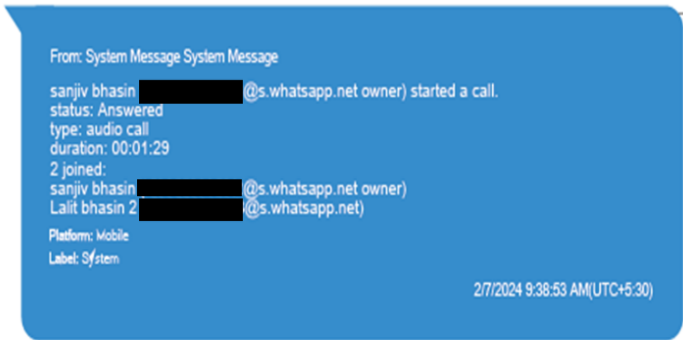


frustration on the non-execution of his instructions and also informed Rajiv Kapoor to complete the same at the earliest. Further, it was revealed that Sanjiv Bhasin (Ph: 981\*\*\*\*162), on February 07, 2024 had two phone calls with Praveen Gupta (Ph: 981\*\*\*\*959) at 09:28:04 AM and 09:29:20 AM.

**52.6** WhatsApp chat and calls between Sanjiv Bhasin and Lalit Bhasin on February 07, 2024 at 09:38 AM (1st Buy leg).

It is important to note here that Sanjiv Bhasin and Lalit Bhasin had also communicated through WhatsApp (chats/calls) w.r.t the execution of trades in the scrip of Paragmilk. From the WhatsApp data obtained from the Seized/Backed-up device of Sanjiv Bhasin (Ph: 981\*\*\*\*162), it was observed that there were messages and calls of Sanjiv Bhasin to Lalit Bhasin regarding the placing of orders and communication of trade confirmation regarding buy and sell trades in the scrip of Parag Milk Foods Ltd on February 07, 2024. The WhatsApp chats and the comments can be seen below:

Table 46

| <b><u>WhatsApp Call on Feb 07, 2024 (1<sup>st</sup> Buy Leg in PARAGMILK)</u></b>    |                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p><b><u>Content:</u></b><br/>Call from Sanjiv Bhasin to Lalit Bhasin</p> <p><b><u>Explanation:</u></b><br/>Here Sanjiv Bhasin (981****162) through WhatsApp has made a call to Lalit Bhasin (981****778) at 09:38 AM. The call time matches exactly with the Order time of PARAGMILK.</p> |

**52.7** The above WhatsApp call was initiated by Sanjiv Bhasin at around 09:38 AM to Lalit Bhasin through WhatsApp, which was immediately after the call with of Sanjiv Bhasin with Rajiv Kapoor (09:37 AM). It is seen that Sanjiv Bhasin on being frustrated, due to non-execution of trades by



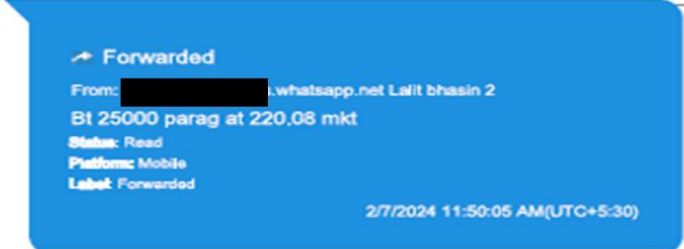

Rajiv had called Lalit Bhasin to ensure that his instruction is to be complied by Rajiv Kapoor immediately. This can be corroborated with the fact that, upon calling Lalit Bhasin, Rajiv Kapoor placed buy order in the scrip of ParagMilk at 09:39 AM which is detailed below. 26,500 shares of ParagMilk were purchased at an average price of ₹218.23. The shares were purchased in the account of HB:

Table 47

| NAME: HB STOCKHOLDINGS LTD |           |                 |              | PAN: AAACH0637F |                |            |          |               |
|----------------------------|-----------|-----------------|--------------|-----------------|----------------|------------|----------|---------------|
| DATE                       | SYMBOL    | INSTRUMENT TYPE | BUY QUANTITY | BUY VALUE       | AVG. BUY PRICE | BUY ORDER  |          | RECO. TIME    |
|                            |           |                 |              |                 |                | Start Time | End Time |               |
| 07.02.2024                 | PARAGMILK | CASH            | 26500        | 57,83,330.2     | 218.23         | 09:39:48   | 09:44:08 | 13:18 & 14:22 |

**52.8** WhatsApp chat and calls between Sanjiv Bhasin (981\*\*\*\*162) and Lalit Bhasin (981\*\*\*\*778) on February 07, 2024 at 11:24 AM to 11:50 AM (2<sup>nd</sup> Buy leg) are shown in the table below:

Table 48

| WhatsApp Chat on Feb 07, 2024 (2 <sup>nd</sup> Buy Leg in PARAGMILK)                                                                                                         |                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <br> | <p><u>Content:</u></p> <ol style="list-style-type: none"><li>“Bt 25000 parag at 220.08 mkt”</li><li>“Fr inf”</li></ol> <p><u>Explanation:</u></p> <p>On Feb 07, 2024 at 11:50 AM, Lalit Bhasin sent a message confirming that 25000 shares of Paragmilk were purchased at an average price of ₹220.08.</p> |



#### WhatsApp Chat on Feb 07, 2024 (2<sup>nd</sup> Buy Leg in PARAGMILK)

From: [REDACTED]@s.whatsapp.net Sanjiv Bhasin (owner)  
To: [REDACTED]@s.whatsapp.net Lalit Bhasin 2

Ok

| Participant                              | Delivered                      | Read                           | Played |
|------------------------------------------|--------------------------------|--------------------------------|--------|
| [REDACTED]@s.whatsapp.net Lalit Bhasin 2 | 2/7/2024 11:50:53 AM(UTC+5:30) | 2/7/2024 11:57:23 AM(UTC+5:30) |        |

Status: Read  
Platform: Mobile

2/7/2024 11:50:52 AM(UTC+5:30)

Content:  
"Ok"

Explanation:  
In reply to the above purchase confirmation messages sent by Lalit Bhasin, Sanjiv Bhasin responds immediately with "Ok" acknowledging the transaction.

**52.9** Subsequently, trade log of the scrip was verified to check the trade details of HB, wherein it was observed that HB bought 25000 shares of ParagMilk at an average buy price of ₹220.08 per share, as per the instructions in the WhatsApp chat above. The 2nd buy leg details of HB in the scrip are as follows:

Table 49

| NAME: HB STOCKHOLDINGS LTD |            |                 |              | PAN: AAACH0637F |               |            |          |               |
|----------------------------|------------|-----------------|--------------|-----------------|---------------|------------|----------|---------------|
| DATE                       | SYMBOL     | INSTRUMENT TYPE | BUY QUANTITY | BUY VALUE       | AVG BUY PRICE | BUY ORDER  |          | RECO. TIME    |
|                            |            |                 |              |                 |               | Start Time | End Time |               |
| 07.02.2024                 | PARAG MILK | CASH            | 25000        | 55,02,149.95    | 220.08        | 11:28:15   | 11:34:37 | 13:18 & 14:22 |

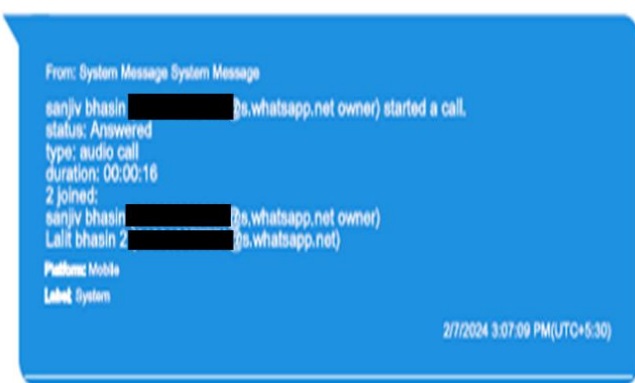
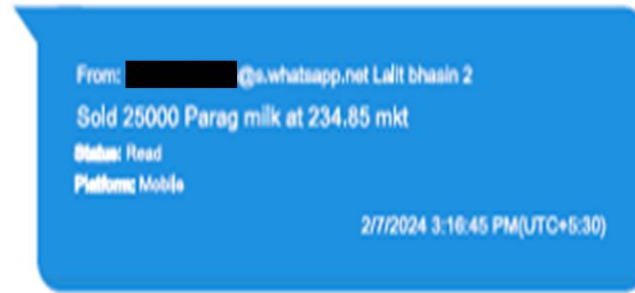
**52.10** From the above details of buy leg, it is seen that Rajiv Kapoor placed orders in the scrip between 11:28 to 11:34. Investigation revealed that the average buy price and number of shares details shared by Lalit Bhasin to Sanjiv Bhasin matched exactly with the data from the trade log and the above chat reveals that the message containing average buy price (*i.e.* 220.08) and number of shares (*i.e.* 25,000) purchased in ParagMilk was shared by Lalit Bhasin to Sanjiv Bhasin. Further, it has



also been found that Lalit Bhasin and Rajiv Kapoor work in the same premises i.e. “H-72, Connaught Circus, New Delhi-110001”.

**52.11** WhatsApp chat and calls between Sanjiv Bhasin (981\*\*\*\*162) and Lalit Bhasin (981\*\*\*\*778) on February 07, 2024 at 15:07 PM to 15:32 PM are reproduced in the tables below for reference:

Table 50

| <b><u>WhatsApp Chat on Feb 07, 2024 (Sell Leg in PARAGMILK)</u></b>                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>From: System Message System Message<br/>sanjiv bhasin [redacted]@s.whatsapp.net owner) started a call.<br/>status: Answered<br/>type: audio call<br/>duration: 00:00:16<br/>2 joined:<br/>sanjiv bhasin [redacted]@s.whatsapp.net owner)<br/>Lalit bhasin 2 [redacted]@s.whatsapp.net)<br/>Platform: Mobile<br/>Label: System<br/>2/7/2024 3:07:09 PM(UTC+5:30)</p> | <p><b><u>Content:</u></b><br/>Sanjiv Bhasin made a WhatsApp call to Lalit Bhasin.</p> <p><b><u>Explanation:</u></b><br/>On Feb 07, 2024 at 03:07 PM, Sanjiv Bhasin made a phone call to Mr. Lalit Bhasin. The sell orders in ParagMilk were placed immediately after this call.</p>                                                  |
|  <p>From: [redacted]@s.whatsapp.net Lalit bhasin 2<br/>Sold 25000 Parag milk at 234.85 mkt<br/>Status: Read<br/>Platform: Mobile<br/>2/7/2024 3:16:45 PM(UTC+5:30)</p>                                                                                                                                                                                                 | <p><b><u>Content:</u></b><br/>“Sold 25000 Parag milk at ₹234.85 mkt”</p> <p><b><u>Explanation:</u></b><br/>After receiving the call from Mr. Sanjiv Bhasin as stated above, Mr. Lalit Bhasin sends a confirmation message at 03:16 PM to Sanjiv Bhasin that 25000 shares of Parag Milk were sold at an average price of ₹234.85.</p> |



| WhatsApp Chat on Feb 07, 2024 (Sell Leg in PARAGMILK) |                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                       | <p><b>Content:</b></p> <ol style="list-style-type: none"> <li>1. <u>WhatsApp call from Sanjiv Bhasin to Lalit Bhasin.</u></li> <li>2. <u>"Total 51500 Parag sold at 235.45"</u></li> </ol> <p><b>Explanation:</b><br/>After receiving the call from Sanjiv Bhasin at 03:17 PM, Mr. Lalit Bhasin confirms at 03:30 PM to Sanjiv Bhasin that total 51500 shares of ParagMilk were sold at an average price of ₹235.45.</p> |
|                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                          |

**52.12** The above images reveal that Sanjiv Bhasin called Lalit Bhasin at 3:07 PM and 3:17 PM through WhatsApp (981\*\*\*\*162). After calls from Sanjiv Bhasin to Lalit Bhasin, sell orders in the scrip were placed immediately and upon execution of orders in the scrip, it was communicated that the average sell price was ₹235.45 and number of shares was 51,500, which matched exactly with the trades carried out in the account of HB, as seen from the trade log. The details of the trades are as follows:

Table 51

| NAME: HB STOCKHOLDINGS LTD |           |                 |               | PAN: AAACH0637F   |                       |            |          |                 |
|----------------------------|-----------|-----------------|---------------|-------------------|-----------------------|------------|----------|-----------------|
| Date                       | Symbol    | Instrument Type | Sell Quantity | Sell value (in ₹) | Avg Sell Price (in ₹) | Sell Order |          | Recommend. Time |
|                            |           |                 |               |                   |                       | Start Time | End Time |                 |
| 07/02/2024                 | ParagMilk | CASH            | 25000         | 58,71,201.55      | 234.85                | 15:08:26   | 15:15:32 | 13:18 & 14:22   |
| 07/02/2024                 | ParagMilk | CASH            | 26500         | 62,54,149.95      | 236.01                | 15:18:50   | 15:28:49 | 13:18 & 14:22   |
| Total                      |           |                 | 51500         | 1,21,25,697.80    | 235.45                |            |          |                 |

**52.13** WhatsApp chat and calls between Sanjiv Bhasin (981\*\*\*\*162) and Lalit Bhasin (981\*\*\*\*778) on February 07, 2024 at 15:07 PM to 15:32 PM (Post Sell) is reproduced below for reference:



Table 52

| WhatsApp chat on Feb 07, 2024 (in relation to scrip PARAGMILK)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                            |                               |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------|--------|------------------------------------------|-------------------------------|-------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <div><div><div><div><div></div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)</div><div>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Now 1.22 or is my cash</div></div><div><table><thead><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr></thead><tbody><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>2/7/2024 3:30:50 PM(UTC+5:30)</td><td>2/7/2024 3:30:52 PM(UTC+5:30)</td><td></td></tr></tbody></table></div><div><div>Status: Read</div><div>Platform: Mobile</div></div><div>2/7/2024 3:30:49 PM(UTC+5:30)</div></div></div></div>            | Participant                                                                                                                                                                                                | Delivered                     | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 2/7/2024 3:30:50 PM(UTC+5:30) | 2/7/2024 3:30:52 PM(UTC+5:30) |  | <div><div>Content:</div><div>"Now ₹1.22. cr is cash"</div><div>Explanation:</div><div>After receiving the confirmation from Lalit Bhasin that 51500 shares of PARAGMILK were sold, Sanjiv Bhasin immediately sends a message to Lalit Bhasin that now ₹1.22 Crores is his cash. This amount matches exactly with the sale value of PARAGMILK shares. This also corroborates the fact that this trade in account of HB Stockholdings Ltd is in fact Sanjiv Bhasin's trade.</div></div> |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Delivered                                                                                                                                                                                                  | Read                          | Played |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2/7/2024 3:30:50 PM(UTC+5:30)                                                                                                                                                                              | 2/7/2024 3:30:52 PM(UTC+5:30) |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <div><div><div><div><div></div><div>From: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>I will chk</div><div>Status: Read</div><div>Platform: Mobile</div></div><div>2/7/2024 3:31:03 PM(UTC+5:30)</div></div></div></div>                                                                                                                                                                                                                                                                                                                                                                                   | <div><div>Content:</div><div>"I will chk"</div><div>Explanation:</div><div>After receiving the message of "Now my cash is ₹1.22 Cr", Lalit Bhasin sends a message that he will check the same.</div></div> |                               |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <div><div><div><div><div></div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)</div><div>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Kindly get this in my daily sheet</div></div><div><table><thead><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr></thead><tbody><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>2/7/2024 3:31:07 PM(UTC+5:30)</td><td>2/7/2024 3:31:12 PM(UTC+5:30)</td><td></td></tr></tbody></table></div><div><div>Status: Read</div><div>Platform: Mobile</div></div><div>2/7/2024 3:31:06 PM(UTC+5:30)</div></div></div></div> | Participant                                                                                                                                                                                                | Delivered                     | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 2/7/2024 3:31:07 PM(UTC+5:30) | 2/7/2024 3:31:12 PM(UTC+5:30) |  | <div><div>Content:</div><div>"Kindly get this in my daily sheet"</div><div>Explanation:</div><div>Here, Sanjiv Bhasin says to get the ₹1.22 Cr cash in his daily sheet indicating that this is a regular occurrence.</div></div>                                                                                                                                                                                                                                                      |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Delivered                                                                                                                                                                                                  | Read                          | Played |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2/7/2024 3:31:07 PM(UTC+5:30)                                                                                                                                                                              | 2/7/2024 3:31:12 PM(UTC+5:30) |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

**52.14** It can be seen from the above screenshot that upon receipt of confirmation of execution of trades from Lalit Bhasin, Sanjiv Bhasin confirmed with Lalit Bhasin that his cash was now ₹1.22 Crores which was the proceeds of the sale of shares of Parag Milk Foods. In the next message Sanjiv Bhasin instructed Lalit Bhasin to get that figure (*i.e.* ₹1.22 Cr) in his daily sheet. This gives an inference that the same was a



daily/regular occurrence and Lalit Bhasin had been aware of the trading details as well as the scheme. Lalit Bhasin received instructions from Sanjiv Bhasin to trade and to record the same in a daily sheet.

**52.15** From the below table, it can be seen that by virtue of the *prima facie* fraudulent trades, a total profit of ₹8,40,217.6 was made through the account of HB Stockholdings, in this illustration. Further, the details of trade quantity and price in the account of HB exactly matched with the content of WhatsApp chat between Sanjiv Bhasin and Lalit Bhasin.

Table 53

| NAME: HB STOCKHOLDINGS LTD |           |                 |              |             | PAN: AAACH0637F |          |               |             |            |          |               |
|----------------------------|-----------|-----------------|--------------|-------------|-----------------|----------|---------------|-------------|------------|----------|---------------|
| DATE                       | SYMBOL    | INSTRUMENT TYPE | BUY QUANTITY | BUY VALUE   | BUY ORDER       |          | SELL QUANTITY | SELL VALUE  | SELL ORDER |          | Reco. Time    |
|                            |           |                 |              |             | Start Time      | End Time |               |             | Start Time | End Time |               |
| 07.02.2024                 | ParagMilk | Cash            | 51500        | 1,12,85,480 | 09:39           | 11:34    | 51500         | 1,21,25,698 | 15:08      | 15:36    | 13:18 & 14:22 |
|                            |           |                 |              |             | Profit          |          | ₹8,40,217.6   |             |            |          |               |

**52.16** Investigation revealed that Praveen Gupta (*Noticee No. 7*), dealer of RRB Master, by being privy to the impending order related information of Sanjiv Bhasin through the call details, as evidenced in the transcript of call between Sanjiv Bhasin and Rajiv Kapoor wherein Rajiv Kapoor had stated “*Sir, wo phone ab aya mere paas Praveen ji se*” from which it can be concluded that he was aware of the same. It was found during the investigation that he had carried out similar fraudulent trades in the trading account of his wife, Babita Gupta, (*Noticee No. 12*). During the investigation, the statement of Praveen Gupta was recorded, wherein he had accepted the fact that he was aware of the trades of Sanjiv Bhasin which were executed through the dealers of RRB Master. It is also pertinent to mention that Praveen Gupta was also one of the authorised signatories of the bank account of RRB Master.





**52.17** Praveen Gupta had received the impending orders of Sanjiv Bhasin and being in proximity to the location of the dealer of RRB Master, had carried out similar fraudulent trades in the account of his wife. Investigation revealed that on Feb 07, 2024, Sanjiv Bhasin initially called Praveen Gupta at 09:28:04 AM. Subsequently, Sanjiv Bhasin had called Rajiv at 09:28:50 AM and enquired about the share price of Indiabulls and Paragmilk. Further, Sanjiv Bhasin at 09:37:24 AM once again called Rajiv to enquire about the placement of orders as instructed earlier in the scrip of Paragmilk. Sanjiv Bhasin on being aware that the orders were not placed in the scrip of Paragmilk, vented his frustration on the non-execution of instructions and also informed Rajiv to execute the trades at the earliest. During the call between Rajiv Kapoor and Sanjiv Bhasin, Rajiv, when enquired about the status of placement of orders of Paragmilk by Sanjiv Bhasin, had informed the receipt of order information from Praveen Gupta making the connection and sharing of information evident. It can therefore, be *prima facie*, inferred that Sanjiv Bhasin had initially informed Praveen Gupta to place orders in the scrip of Paragmilk and subsequently enquired the placement of orders from Rajiv Kapoor.

**52.18** The details of trades of Praveen Gupta in the trading account of Babita Gupta is given in the table below:

Table 54

| NAME: BABITA GUPTA |            |                 |              |           | PAN: AAEPG1745N |          |               |            |            |          |               |
|--------------------|------------|-----------------|--------------|-----------|-----------------|----------|---------------|------------|------------|----------|---------------|
| DATE               | SYMBOL     | INSTRUMENT TYPE | BUY QUANTITY | BUY VALUE | BUY ORDER       |          | SELL QUANTITY | SELL VALUE | SELL ORDER |          | REC O. TIME   |
|                    |            |                 |              |           | Start Time      | End Time |               |            | Start Time | End Time |               |
| 07.02.2024         | PARAG MILK | CASH            | 400          | 86,220    | 09:34           | 09:34    | 400           | 94,000     | 14:48      | 14:48    | 13:18 & 14:22 |
|                    |            | Avg. Buy price  | 215.50       |           | Avg. Sell Price |          | 235.00        |            |            | Profit   | ₹7,780        |





**52.19** A brief analysis of trades in PARAGMILK by HB and Babita Gupta wife of Praveen Gupta based on NPI of trades placed by Sanjiv Bhasin in the account of HB has been given below:

Table 55

|                                                                                                   |                          |                   |                  |                   |
|---------------------------------------------------------------------------------------------------|--------------------------|-------------------|------------------|-------------------|
| <b>DATE</b>                                                                                       | 07.02.2024               |                   | 07.02.2024       |                   |
| <b>SYMBOL</b>                                                                                     | PARAGMILK                |                   | PARAGMILK        |                   |
| <b>PAN</b>                                                                                        | AAACH0637F               |                   | AAEPG1745N       |                   |
| <b>Client Name</b>                                                                                | HB STOCKHOLDINGS LIMITED |                   | BABITA GUPTA     |                   |
| <b>INSTRUMENT TYPE</b>                                                                            | CASH                     |                   | CASH             |                   |
| <b>Trade Leg</b>                                                                                  | Buy Leg of Trade         | Sell Leg of Trade | Buy Leg of Trade | Sell Leg of Trade |
| <b>Order Start Time</b>                                                                           | 09:39                    | 15:08             | 09:34            | 14:48             |
| <b>Order End Time</b>                                                                             | 11:34                    | 15:28             | 09:34            | 14:48             |
| <b>Trade Start Time</b>                                                                           | 09:39                    | 15:08             | 09:34            | 15:08             |
| <b>Trade End Time</b>                                                                             | 11:34                    | 15:28             | 09:34            | 15:08             |
| <b>Average Price</b>                                                                              | 219.13                   | 235.45            | 215.5            | 235               |
| <b>Traded Quantity</b>                                                                            | 51,500                   | 51,500            | 400              | 400               |
| <b>Total Value Traded ₹</b>                                                                       | 1,12,85,480              | 1,21,25,698       | 86,220           | 94,000            |
| <b>Recommendation Time</b>                                                                        | 13:18 & 14:22            |                   | 13:18 & 14:22    |                   |
| <b>Client Traded Vol (Gross) to Market Vol.</b>                                                   | 0.47%                    |                   | 0.003%           |                   |
| <b>Client Traded Val in the select security vis-à-vis all securities in the market on the day</b> | 26%                      |                   | 60.51%           |                   |
| <b>Profit ₹</b>                                                                                   | 8,40,217                 |                   | 7,780            |                   |

**53.** Accordingly, it is seen that Sanjiv Bhasin made a profit of ₹8.4 lacs by first accumulating the shares of PARAGMILK, then recommending the scrip as his special pick through IIFL Communication channels and then subsequently squaring off the position in shares of PARAGMILK by selling them immediately after the recommendation. In this way, Sanjiv Bhasin misled the investors by making buy recommendation but immediately thereafter, selling the shares/squaring off his position & profiting from it. Furthermore, Praveen Gupta on becoming aware of the fraudulent scheme of Sanjiv Bhasin, carried out similar such trades and made an alleged ill-gotten gain of ₹7,780/- by trading in the account of his wife Babita Gupta.



### F.3 Illustration of recommendation on ET NOW- InterGlobe Aviation Limited

54. On January 30, 2024, the Noticee No. 1 made a guest appearance on TV Channel on ET Now- Swadesh under Tag name of “भसीन के बेहतरीन शेयर” (i.e. Excellent shares by Bhasin). On this show, Sanjiv Bhasin had recommended to the viewers at 08:51 AM, to buy the scrip of InterGlobe Aviation Limited on a long term basis. A screenshot of his appearance and the recommendation is given below:

Figure 8



55. The details of the recommendation are given below:

Table 56

| SCRIP NAME                           | RECOM MENDAT ION | DATE AND TIME OF RECOMMENDATION               | TARGET PRICE | STOP LOSS |
|--------------------------------------|------------------|-----------------------------------------------|--------------|-----------|
| InterGlobe Aviation Limited (INDIGO) | Buy              | Wednesday, January 30, 2024 (around 08:51 AM) | ₹3100        | ₹2835     |

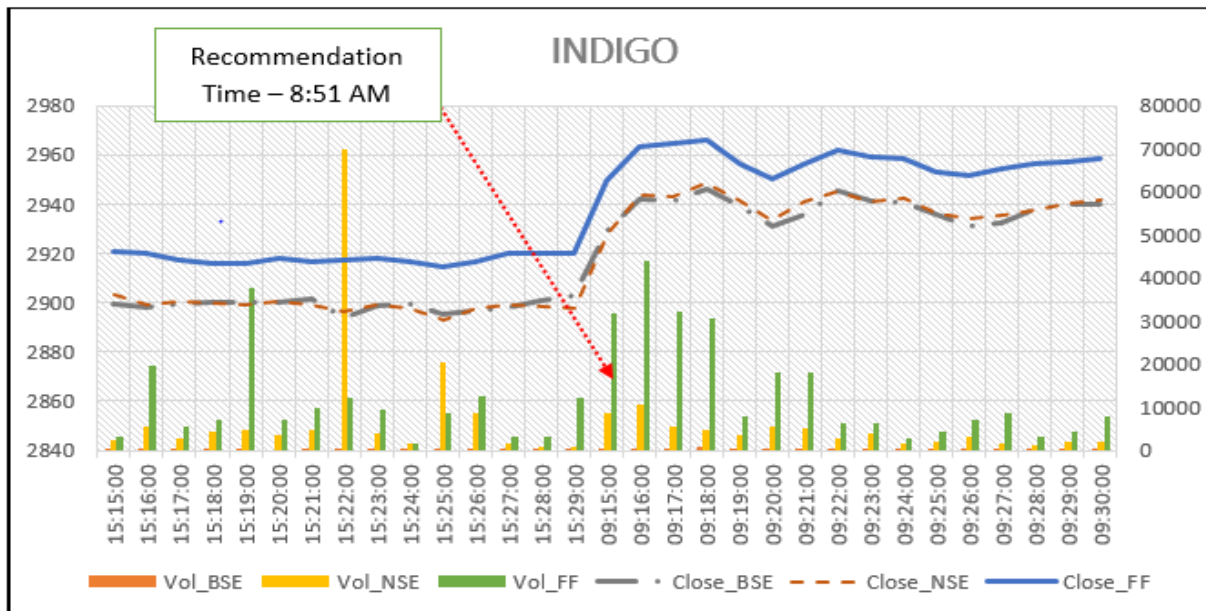
56. Investigation revealed that Sanjiv Bhasin had carried out the trades, contrary to his own recommendation in the instrument - INDIGO24FEBFUT, in the trading account of Venus, through RRB Master, on Jan 29-30, 2024.

57. The recommendation was made on Jan 30, 2024 during pre-opening session at around 08:51 AM on ET Now. The price and volume chart, during 15 minutes



pre and post the recommendation time (i.e. From 3:15-3:30 (Jan 29, 2024) to 9:15-9:30 (Jan 30, 2024)) in the scrip of “INDIGO” in BSE NSE equity cash segment and NSE Futures is given below:

Figure 9



58. A significant impact on the price and the trading volume of the scrip/contract was observed post recommendation in the show, as shown below:

Table 57

| Recommendation date              |                                                                                                              | January 30, 2024 |          |          |
|----------------------------------|--------------------------------------------------------------------------------------------------------------|------------------|----------|----------|
| Recommendation time (t)          |                                                                                                              | 08:51 AM         |          |          |
| Scrip/Contract Recommended       |                                                                                                              | INDIGO           |          |          |
| Recommended Levels (For Cash)    | Recommended Price (₹)                                                                                        | ₹3100            |          |          |
|                                  | Target Price (₹)                                                                                             | ₹3100            |          |          |
|                                  | Stop Loss (₹)                                                                                                | 2835             |          |          |
| Scrip/Contract                   |                                                                                                              | INDIGO           |          |          |
|                                  |                                                                                                              | BSE (EQ)         | NSE (EQ) | NSE (FF) |
| Price Impact Post Recommendation | Average High/ Low Variation % in preceding 15 min [3:15 -3:30 PM, Jan 29, 2024]                              | 0.10             | 0.12     | 0.11     |
|                                  | Average High/ Low Variation % during recommendation time and succeeding 2 min [9:15 - 9:17 AM, Jan 30, 2024] | 0.99             | 0.55     | 0.60     |
|                                  | Average High/ Low Variation % in succeeding 15 Min [9:15 - 9:30 AM, Jan 30, 2024]                            | 0.27             | 0.30     | 0.26     |
| Volume Impact Post               | Avg. Trading Vol in Preceding 15 min [3:15 -3:30 PM, Jan 29, 2024] (number of shares/underlying shares)      | 95               | 9053     | 10220    |



|                                                                                                   |                                                                                                                                      |     |      |       |
|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|-----|------|-------|
| Recommendation                                                                                    | Avg. Trading Vol during recommendation time and succeeding 2 min [9:15 - 9:17 AM, Jan 30, 2024] (number of shares/underlying shares) | 246 | 9576 | 37800 |
|                                                                                                   | Avg. Trading Vol for succeeding 15 min [9:15 - 9:17 AM, Jan 30, 2024] (number of shares/underlying shares)                           | 192 | 4084 | 14980 |
| Relevant Price Sensitive Corporate Announcement on the day of the recommendation or the prior day |                                                                                                                                      | NIL | NIL  | NIL   |

**59.** The analysis of the price impact in the scrip shows the following:

- i. In the preceding 15 minutes before the recommendation, the average high/low price variation was relatively low at 0.10%, 0.12%, 0.11% for the scrip INDIGO at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. However, in the subsequent 2 minutes after recommendation and opening session (t and t+2), there was a significant surge in price volatility, with an average high/low variation of 0.99%, 0.55% and 0.60% for the scrip INDIGO at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation and opening session, the average high/low variation stood at 0.27%, 0.30%, 0.26% for the scrip INDIGO at BSE (EQ), NSE (EQ) and NSE (Future) respectively.

**60.** An analysis of the volume impact in the scrip shows the following:

- i. The average trading volume in the 15 minutes leading up to the recommendation (t-15) was 95 shares, 9053 shares and 10220 shares for the scrip INDIGO at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. However, in subsequent 2 minutes after recommendation and opening session (t and t+2), the trading volume experienced a substantial increase, reaching an average of 246 shares, 9576 shares, and 37800 shares for the scrip INDIGO at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation and opening session, the average trading volume remained elevated at 192 shares, 4084 shares and 14980 shares for the scrip INDIGO at BSE (EQ), NSE (EQ) and NSE (Future) respectively.

**61.** From the above, it is seen that the recommendation had a significant impact on both the price and trading volume of the scrip INDIGO and its derivatives



contract. Further, there were no relevant price-sensitive corporate announcements around the time of recommendation, which could explain the sudden rise in price and volume in the scrip of INDIGO and also no material relevant price sensitive corporate announcement on the day of the recommendation (Jan 30, 2024) or the prior trading day (Jan 29, 2024).

62. During the investigation, it was revealed that Venus created buy position in INDIGO24FEBFUT on January 29, 2024 and squared off the position on the day of recommendation *i.e.* on January 30, 2024. The summary of trading activity of Venus is as under:

Table 58

| VENUS PORTFOLIOS PRIVATE LIMITED |                                    |
|----------------------------------|------------------------------------|
| Instrument                       | INDIGO24FEBFUT                     |
| <b>Date of Buy Leg</b>           | <b>Tuesday, January 29, 2024</b>   |
| Net Qty                          | 9900                               |
| Average Price (₹)                | 2909.23                            |
| Total Traded Value (₹)           | 2,88,01,395.00                     |
| <b>Date of Sell Leg</b>          | <b>Wednesday, January 30, 2024</b> |
| Net Qty                          | 9900                               |
| Average Price (₹)                | 2958.39                            |
| Total Traded Value (₹)           | 2,92,88,100.00                     |
| <b>Profit</b>                    | <b>4,86,705.00</b>                 |

- 62.1 The aforesaid buy and sell trades were done through CTCL ID - 110034002002, registered in the name of Jagat Singh, Dealer at RRB Master. The details of the order placement both during the buy and the sell leg are given below:

Table 59

| Date       | Buy/Sell | Traded Qty | Trade Price Range | No. of orders | Order Time        | Order modified time | Order Limit Price Range (₹) | Trade Time        | Trade Price Range (₹) |
|------------|----------|------------|-------------------|---------------|-------------------|---------------------|-----------------------------|-------------------|-----------------------|
| 29/01/2024 | Buy      | 9900       | 300               | 6             | 13:08:39-13:11:48 | 13:08:39-13:11:48   | 2906.15-2915                | 13:08:39-13:11:48 | 2906.15-2915          |
| 30/01/2024 | Sell     | 9900       | 300-1500          | 10            | 09:15:00-12:11:28 | 09:17:06-12:15:21   | 2947-2970                   | 09:17:06-12:15:21 | 2947-2970             |

- 62.2 It is seen that the six buy orders, as shown in the above table, were placed during 13:08:39 PM-13:11:48 PM on January 29, 2024, a day



prior to the aforesaid buy recommendation on ET Now. These buy orders were executed during the same time interval *i.e.* 13:08:39 PM-13:11:48 PM.

**62.3** Further, the ten sell orders were placed during 09:15:00 AM– 12:11:28 PM on January 30, 2025. This was just after the timing of recommendation (at 08:51 AM, pre-market hours) by *Noticee No. 1*. The sell orders were modified during 09:17:06 AM-12:15:21 AM. The sell order was executed during 09:17:06-12:15:21. It was further observed that 42% of the sell orders (4200 out of 9900) were placed from the trading account of Venus, within 4 minutes of market opening *i.e.* during 09:15:00 AM-09:19:00 AM.

**62.4** The following table shows the details of the sell orders placed by Venus:

Table 60

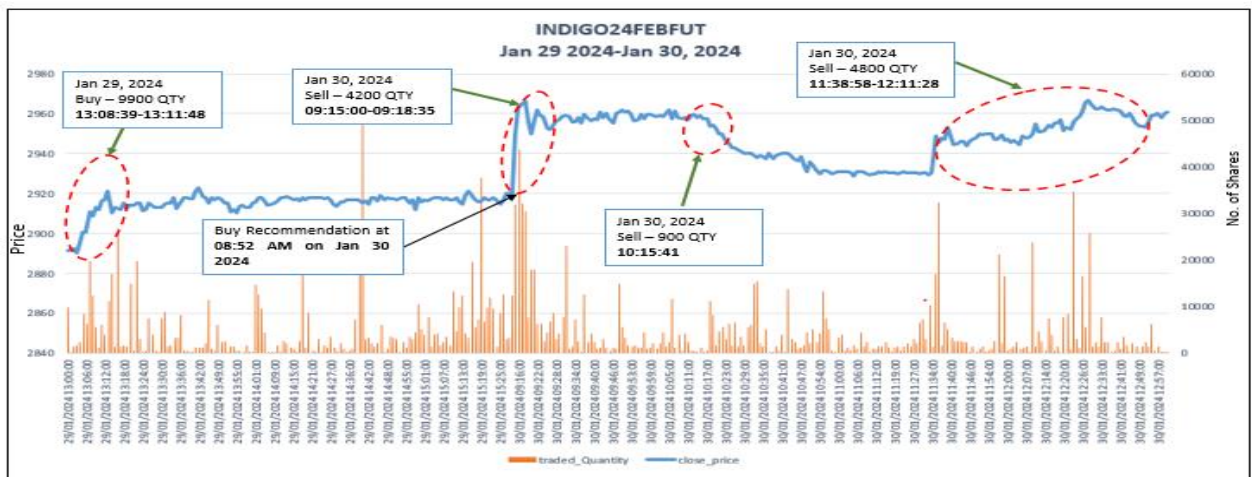
| SELL ORDER NO.        | SELL ORDER TIME   | MODIFIED TIME     | TRADED QTY |
|-----------------------|-------------------|-------------------|------------|
| 2300000000009680      | 09:15:00-09:15:00 | 09:18:10-09:18:10 | 1500       |
| 2300000001099760      | 09:17:06-09:17:06 | 09:17:06-09:17:06 | 1500       |
| 2300000001224090      | 09:17:20-09:17:20 | 09:18:03-09:18:03 | 900        |
| 2300000001651200      | 09:18:35-09:18:35 | 09:18:35-09:18:35 | 300        |
| 23000000026471480     | 10:15:41-10:15:41 | 10:15:41-10:15:41 | 900        |
| 23000000057581290     | 11:38:17-11:38:17 | 11:38:17-11:38:33 | 1200       |
| 23000000057796600     | 11:38:58-11:38:58 | 11:39:18-11:39:18 | 900        |
| 23000000060133070     | 11:45:18-11:45:18 | 12:15:21-12:15:21 | 900        |
| 23000000069639200     | 12:11:19-12:11:19 | 12:11:19-12:11:19 | 900        |
| 23000000069694780     | 12:11:28-12:11:28 | 12:13:03-12:13:36 | 900        |
| Total Traded Quantity |                   |                   | 9900       |

**62.5** Upon further examination and comparison of timing of sell orders vis-à-vis price/volume variation, it is seen that Venus wanted to get maximum benefit out of surge in price/volume in scrip owing to the recommendation made by Sanjiv Bhasin on ET Now. The time of trades and price / volume chart are provided below:





Figure 10



**62.6** The aforesaid buy and sell orders in the account of Venus were placed by Jagat Singh, *Noticee No. 6*, dealer at RRB Master on Jan 29 2024 and Jan 30, 2024, respectively. Investigation revealed that the timing of the buy and sell orders in INDIGO24FEBFUT matched with the timing of calls between Sanjiv Bhasin and Jagat Singh, which is explained through the below table:

Table 61

| Date         | Timing               | Nos. of Call   | Sanjiv to Jagat | Jagat to Sanjiv |
|--------------|----------------------|----------------|-----------------|-----------------|
| Jan 29, 2024 | 09:12:40<br>13:07:17 | -<br><b>5</b>  | 4               | 1               |
| Jan 30, 2024 | 09:14:15<br>15:18:31 | -<br><b>17</b> | 15              | 2               |
| Total        |                      | <b>22</b>      | 19              | 3               |

**62.7** On Jan 29, 2024, Sanjiv Bhasin (981\*\*\*\*162) called Jagat (836\*\*\*\*616) during 13:07:17 PM-13:12:33 PM (Duration- 317 seconds). Investigation revealed that during this call, the buy orders (buy order timing i.e. 13:08:39 PM-13:11:48 PM) were placed in the account of Venus by Jagat. Further, On Jan 30, 2024, there were 17 calls between Sanjiv Bhasin (981\*\*\*\*162) and Jagat (836\*\*\*\*616) and it was during/around such calls, the sell orders were placed/modified in the account (sell orders time- 09:15:00 AM – 12:11:28 PM). The same is evident from the following tables which provide the details of timing of placement of sell orders vs timings of calls:



Table 62

| SALE ORDER NO.              | SELL ORDER TIME   | CALL TIMING       | TRADED QTY |
|-----------------------------|-------------------|-------------------|------------|
| 2300000000009680            | 09:15:00-09:15:00 | 09:14:15-09:17:51 | 1500       |
| 2300000001099760            | 09:17:06-09:17:06 |                   | 1500       |
| 2300000001224090            | 09:17:20-09:17:20 |                   | 900        |
| 2300000001651200            | 09:18:35-09:18:35 | 09:18:34-09:20:33 | 300        |
| Sub Total (A)               |                   |                   | 4200       |
| 2300000026471480            | 10:15:41-10:15:41 | 10:15:10-10:17:05 | 900        |
| 2300000057581290            | 11:38:17-11:38:17 | 11:37:53-11:38:05 | 1200       |
| 2300000057796600            | 11:38:58-11:38:58 | 11:38:36-11:41:59 | 900        |
| 2300000060133070            | 11:45:18-11:45:18 | 11:43:15-11:45:37 | 900        |
| 2300000069639200            | 12:11:19-12:11:19 | 12:11:10-12:12:34 | 900        |
| 2300000069694780            | 12:11:28-12:11:28 |                   | 900        |
| Sub Total (B)               |                   |                   | 5700       |
| Total Traded Quantity (A+B) |                   |                   | 9900       |

**62.8** From the above evidence, it is evident that Sanjiv Bhasin and Jagat were in constant touch with each other during the placement/modification of orders being placed in the trading account of Venus for INDIGO24FEBFUT. It was also observed that there were frequent WhatsApp Calls and Chats during Jan 29, 2024 - Jan 30, 2024 between these two *Noticees* i.e. when buy/sell trades were being placed in the INDIGO24FEBFUT. The contents of these WhatsApp chats are related to order details being executed by Jagat through RRB Master, details of which are provided below:





Table 63

**WhatsApp Chat on Jan 29, 2024 (Buy Leg in INDIGO24FEBFUT)**

January 29, 2024

From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)  
To: [REDACTED]@s.whatsapp.net Jagat Yadav

Kindly send screenshot

| Participant                           | Delivered                      | Read                           | Played |
|---------------------------------------|--------------------------------|--------------------------------|--------|
| [REDACTED]@s.whatsapp.net Jagat Yadav | 1/29/2024 3:36:29 PM(UTC+5:30) | 1/29/2024 3:36:51 PM(UTC+5:30) | 4      |

Status: Read  
Platform: Mobile

1/29/2024 3:36:28 PM(UTC+5:30)

Content:

Text - "Kindly Send Screenshot"

Explanation:

On Jan 29, 2024, around 3:36 PM, Sanjiv Bhasin requested Jagat Singh to forward screen shot of trades executed on Jan 29, 2024. It may be noted that on this day, Jagat bought 9900 INDIGO24FEBFUT.

January 29, 2024:

From: [REDACTED]@s.whatsapp.net Jagat Yadav

Attachments:

Size: 41727  
File name: s4c0f7c2-48dd-4dd8-99d3-012b7e546cba.jpg  
Path: https://mmg.whatsapp.net/o/1/va62.7118-24/1/m2.38/up-oil-image-c4d19148-550f-48c9-9d34-54f612dc26dc?ccb=9-4&oh=01\_AdRagZeJNAa6OjdxD3iv6PG8AwPS\_oU66276tqapwZ5Lg&oe=6SDEF4A1&\_nc\_sid=000000&mem3=true  
s4c0f7c2-48dd-4dd8-99d3-012b7e546cba.jpg

Status: Read  
Platform: Mobile

1/29/2024 3:38:37 PM(UTC+5:30)

Content-

Attachment - The screenshot of trades executed.

Explanation:

In reply to above message, Jagat forwarded the screenshot of trades executed on Jan 29, 2024, around 3:36 PM. This screen shot includes the details of buy order executed for 9900 quantity INDIGO24FEBFUT.

Screenshot sent on Jan 29, 2024:

| Client | Symbol    | Set/Exp   | Buy Qty | Buy Val  | Buy Avg | Sell Qty | Sell Val   | Sell Avg | Net Qty | Net Val    | Net Price | Market Price | MTM Pts   | MTM G/L   |
|--------|-----------|-----------|---------|----------|---------|----------|------------|----------|---------|------------|-----------|--------------|-----------|-----------|
| HB01   | BANKNIFTY | 29-Feb-24 |         |          |         | 375      | 17261255.3 | 46030.01 | -375    | 17261255.3 | 46030.01  | 45850.55     | -17193956 | 67299     |
| VP     | BANKNIFTY | 29-Feb-24 |         |          |         | 975      | 44872831.5 | 46023.42 | -975    | 44872831.5 | 46023.42  | 45850.55     | -44704286 | 168545.25 |
| US     | ICICIBOIL | 28-Feb-24 |         |          |         | 60000    | 29648325   | 494.14   | -60000  | 29648325   | 494.14    | 495.45       | -29727000 | -78675    |
| VP     | INDIGO    | 29-Feb-24 | 9900    | 28801395 | 2909.23 |          |            |          | 9900    | 28801395   | 2909.23   | 2920         | 28960000  | 106605    |
| (ALL)  | (ALL)     | (ALL)     | 9900    | 28801395 |         | 61350    | 91782411.8 |          | -51450  | 62961016.8 |           |              | -62717243 | 263774.25 |

The aforesaid chats were also found in seized data from Jagat Singh Mobile (852\*\*\*\*988).



Jan 30, 2024:

From: [REDACTED]@s.whatsapp.net Jagat Yadav

Attachments:

File name: a8e77421-0e47-4246-bb47-3b577fd13b43.jpg  
Path: https://mmg.whatsapp.net/o1/v/a62.7118-24/f/mz38/up-oil-image-19ea064e-5450-444e-8304-d69876f03dc15?ccb=3-4&oh=01\_AuScQ4CWB8X0DA7C2TjE7HY3G&MZ1qZvYwac8V2-w5eXKA&oe=65E029CA&nc\_sid=000000&mms3=true  
a8e77421-0e47-4246-bb47-3b577fd13b43.jpg

Status: Read

Platform: Mobile

1/30/2024 1:08:12 PM(UTC+5:30)

Screenshot sent on Jan 30, 2024:

| Client | Instrument | Instrument Symbol | Exp Date  | Buy Qty | Buy Val    | Buy Avg | Sell Qty | Sell Val | Sell Avg | Net Qty | Net Val    | Net Price | Market Price | MTM P/L   | MTM G/L |
|--------|------------|-------------------|-----------|---------|------------|---------|----------|----------|----------|---------|------------|-----------|--------------|-----------|---------|
| VP     | Futures    | INDIGO            | 29-Feb-24 | 9900    | 25380.00   | 2563.93 | 9900     | 25380.00 | 2563.93  | -9900   | 25380.00   | 2563.93   | 2563.93      | -25380.00 | -18870  |
| VP     | Futures    | INDIGO            | 29-Feb-24 | 9900    | 25380.00   | 2563.93 | 9900     | 25380.00 | 2563.93  | 0       | 3337.5     | 3337.5    | 3337.5       | 0         | 3337.5  |
| VP     | Futures    | NESTLEIND         | 29-Feb-24 | 4000    | 10117960   | 2529.49 | 4000     | 10117960 | 2529.49  | 4000    | -10117960  | 2529.49   | 2532.15      | 101128000 | 10640   |
| VP     | Futures    | TATACOMM          | 29-Feb-24 | 5000    | 8673225    | 1734.64 | 5000     | 8673225  | 1734.64  | 1738    | 8680000    | 1738      | 8680000      | 16775     |         |
| (ALL)  | (ALL)      | (ALL)             | (ALL)     | 9750    | 22878047.5 |         | 10650    | 33378000 |          | -900    | 10500252.5 |           | -104881970   | 11882.5   |         |

Content-

Attachment - The screenshot of trades executed.

Explanation:

In reply to the above message, on Jan 30, 2024, around 1:08 PM, Jagat forwarded the details of the trades executed. This screen shot includes the details of the sell order executed in the scrip of Indigo.

The aforesaid chats were also found in seized data from Jagat Singh's Mobile (852\*\*\*\*988).

63. From the above, it can be seen that Jagat had executed trades in the scrip in INDIGO24FEBFUT as per the instructions of Sanjiv Bhasin, which was further confirmed by Jagat and the screenshots of the same were also shared with Sanjiv Bhasin. The same can be verified from the pictorial representations shown hereinabove. Accordingly, a profit of ₹4,86,705.00/- was made by the Noticee No. 1 by doing trades in the pattern of Buy Today Sell Tomorrow ("BTST") trades in INDIGO24FEBFUT during Jan 29, 2024 – Jan 30, 2024 in the account of Venus.
64. It is pertinent to note that on one hand the Noticee No. 1 recommended the viewers to buy INDIGO on a long term basis just during the pre-market hours at 08:51 AM and on the other hand, contrary to his recommendation for the viewers, he instructed Jagat to sell INDIGO24FEBFUT in the account of Venus after the opening of market hours, and squared off all his position. Furthermore, upon execution of trades, as instructed, Jagat forwarded all screenshots detailing the sell price, number of shares sold, sell value, etc. to Sanjiv Bhasin.
65. The above trades, *prima facie* show that Sanjiv Bhasin was not genuine about his recommendation and advice given to the gullible and innocent investors. Investors would have invested their hard earned money on his recommendation for the long term believing the advice/recommendation to be research



backed/time oriented, only to be deceived by such manipulative advice wherein the advisor himself is squaring off all his positions to make huge gains at the cost of their investments and profiting from the immediate and sharp price movement.

#### F.4 Illustration of Recommendation on ZEE Business news channel- Steel Authority of India Limited (SAIL)

66. It was found during the investigation that on August 26, 2022, the *Noticee No. 1* made a guest appearance on Zee Business media channel in the show **“Bhasin ke hasin share”**. At 09:52 AM, he recommended to viewers to **buy** shares of Steel Authority of India Ltd (scrip code **“SAIL”**). A snapshot of his appearance on the media channel recommending to buy SAIL is provided below:

Figure 11



67. From the above, it can be seen that the *Noticee No. 1* recommended the following w.r.t. the scrip of SAIL:

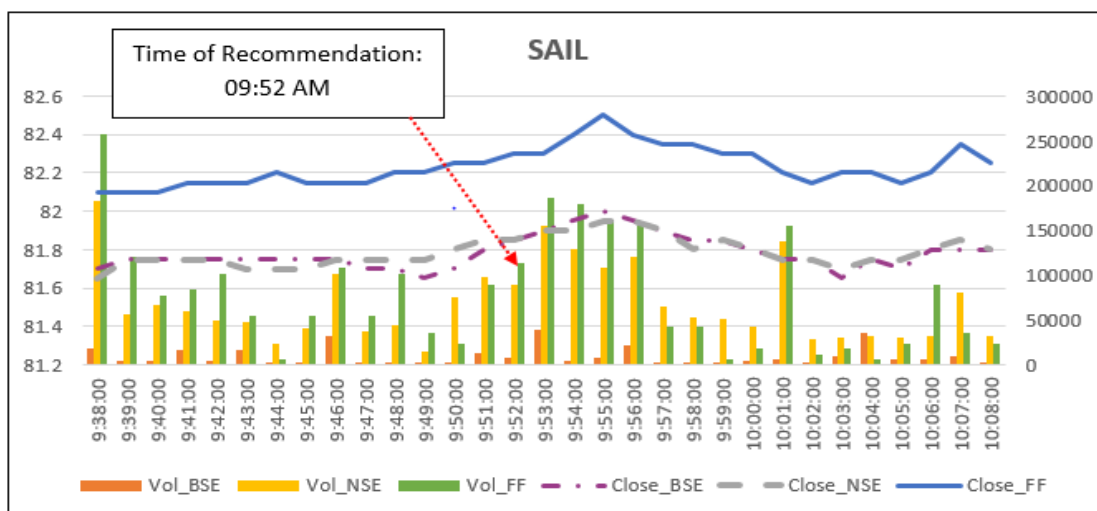
Table 64

| DATE            | SCRIP                                      | CMP    | TARGET PRICE | STOP LOSS | RECOMMENDATION |
|-----------------|--------------------------------------------|--------|--------------|-----------|----------------|
| August 26, 2022 | Steel Authority of India Limited (“SAIL”). | ₹82.30 | ₹90          | ₹78       | BUY            |



68. The recommendation was made on ZEE Business during the market hours at 09:52 AM. The price and volume chart, during 15 minutes pre and post the recommendation time (*i.e.* 09:52 AM) in the scrip of “SAIL” in BSE equity cash segment, NSE equity cash segment and NSE Futures is given below:

Figure 12



69. It is seen that significant impact on the price and the trading volume of the scrip was observed post the aforesaid recommendation in the show, the details of which are given in the table below:

Table 65

| Recommendation date               |                                                                                                                   | August 26, 2022                  |          |          |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------|----------------------------------|----------|----------|
| Recommendation time (t)           |                                                                                                                   | 09:52 AM                         |          |          |
| Scrip/Contract Recommended        |                                                                                                                   | SAIL                             |          |          |
| Recommended Levels                | CMP (₹)                                                                                                           | 82.30                            |          |          |
|                                   | Target Price (₹)                                                                                                  | 90                               |          |          |
|                                   | Stop Loss (₹)                                                                                                     | 78                               |          |          |
| Scrip/Contract                    |                                                                                                                   | Steel Authority of India Limited |          |          |
|                                   |                                                                                                                   | BSE (EQ)                         | NSE (EQ) | NSE (FF) |
| Price Impact Post Recommendation  | Average High/ Low Variation % in preceding 15 mins [t-15]                                                         | 0.13%                            | 0.11%    | 0.09%    |
|                                   | Average High/ Low Variation % during recommendation time and succeeding 2 mins [t and t+2]                        | 0.14%                            | 0.16%    | 0.18%    |
|                                   | Average High/ Low Variation % in succeeding 15 mins [t+15]                                                        | 0.14%                            | 0.14%    | 0.10%    |
| Volume Impact Post Recommendation | Avg Trading Vol in Preceding 15 mins [t-15] (number of shares/underlying shares)                                  | 8727                             | 65737    | 85600    |
|                                   | Avg Trading Vol during recommendation time and succeeding 2 mins [t and t+2] (number of shares/underlying shares) | 16998                            | 131575   | 176000   |



|                                                                                                   |                                                                                    |      |       |       |
|---------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|------|-------|-------|
|                                                                                                   | Avg Trading Vol for succeeding 15 mins [t+15] (number of shares/underlying shares) | 8006 | 64889 | 64800 |
| Relevant Price Sensitive Corporate Announcement on the day of the recommendation or the prior day |                                                                                    | NA   |       |       |

**70.** The analysis of the price impact in the scrip shows the following:

- i. In the preceding 15 minutes before the recommendation, the average high/low price variation was at 0.13%, 0.11%, 0.09% for SAIL scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. However, during the recommendation time and the subsequent 2 minutes (t and t+2), there was a significant surge in price volatility, with an average high/low variation of 0.14%, 0.16% and 0.18% for SAIL scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average high/low variation stood at 0.14%, 0.14%, 0.10% for SAIL scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.

**71.** An analysis of the volume impact in the scrip shows the following:

- i. The average trading volume in the 15 minutes leading up to the recommendation (t-15) was 8727 shares, 65737 shares and 85600 shares for SAIL scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. During the recommendation time and the following 2 minutes (t and t+2), the trading volume experienced a substantial increase, reaching an average of 16998 shares, 131575 shares, and 176000 shares for SAIL scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average trading volume stood at 8006 shares, 64889 shares and 64800 shares for SAIL scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.

**72.** From the above, it is seen that the recommendation given by the *Noticee No. 1* had an impact on both, scrip price of SAIL at Futures segment and the trading volume of SAIL in both cash and futures segment. Further, there were no relevant price-sensitive corporate announcements around the time of



recommendation (*i.e.* 09:52 AM), which could explain the sudden rise in price and volume in the scrip of SAIL.

**73.** The investigation further revealed that the *Notictee No. 1* had traded in the scrip of SAIL on the recommendation date (*i.e.* August 26, 2022), through HB and made a profit of ₹63,000. The following paragraphs detail the trades done in the trading account of HB with the same modus operandi as discussed in other examples above:

**73.1** The investigation reveals that, before making the said recommendation on the news channel, the *Notictee No. 1* had made four phone calls to *Notictee No. 5* for placing buy orders in the scrip of SAIL. Further, post the recommendation (at 09:52 AM), the *Notictee No. 1* had made two phone calls to *Notictee No. 5* for placing sell orders in the scrip of SAIL and squaring-off the positions taken earlier. The summary of calls exchanged between *Notictee No. 1* and *Notictee No. 5* during the recommendation day (before and after the recommendation time of 09:52 AM), is tabulated below:

Table 66

| Call Details                                                                                          | Time     | Instruction (On call) |
|-------------------------------------------------------------------------------------------------------|----------|-----------------------|
| First Call                                                                                            | 09:14 AM | Buy SAIL              |
| Second Call                                                                                           | 09:25 AM | Buy SAIL              |
| Third Call                                                                                            | 09:31 AM | Buy SAIL & Sell SAIL* |
| Fourth Call                                                                                           | 09:40 AM | Buy SAIL              |
| <b>Recommendation on ZEE Business Media Channel at 09:52 AM</b>                                       |          |                       |
| Fifth Call                                                                                            | 10:19 AM | Sell SAIL             |
| Sixth Call                                                                                            | 10:40 AM | Sell SAIL             |
| *As per the trade logs, the orders instructed by Sanjiv Bhasin during his call could not be executed. |          |                       |

**73.2** The details of trades done in the trading account of HB are given below:





Table 67

| Date and Recommendation time – Aug 26, 2022, 09:52 AM<br>(Contract- SAIL22SEPFUT) |            |                 |               |                 |                |                      |                   |               |                  |                |                      |
|-----------------------------------------------------------------------------------|------------|-----------------|---------------|-----------------|----------------|----------------------|-------------------|---------------|------------------|----------------|----------------------|
| Client Name                                                                       | PAN        | Buy (First Leg) |               |                 |                |                      | Sell (Second Leg) |               |                  |                |                      |
|                                                                                   |            | Order Time      | Trade Time    | Buy Price Range | Trade Quantity | Total Value Traded ₹ | Order Time        | Trade Time    | Sell Price Range | Trade Quantity | Total Value Traded ₹ |
| HB Stockholding<br>s Limited                                                      | AAACH0637F | 09:15 – 09:40   | 09:15 – 09:40 | 81.75 – 82.15   | 96000          | 7876200              | 10:40 – 10:42     | 10:40 – 10:42 | 82.60 – 82.80    | 96000          | 7939200              |

**73.3** Transcript of the first call between Noticee No. 1 and Noticee No. 5 at 09:14 AM on Aug 26, 2022– Buy Side is given below:

*“Sanjiv – 36000 SAIL lele...*

*Sanjiv – Aa gaye ...*

*Rajiv– Haan aagaye...*

*Sanjiv - Wo aa gaye 36000?*

*Rajiv– Who aagaye tha sir, wo to pahle hi bata diya tha*

*Sanjiv -Kya bhav*

*Rajiv– 81 rupeeya 83 paise*

*Sanjiv – Chal Rajiv jo hua hain ek bar screenshot bhej de yaar*

*Rajiv- ji sir....”*

**73.4** From the above, it can be seen that the Noticee No. 1 called Noticee No. 5 at 09:14 AM and instructed him to buy 36000 quantity of SAIL Futures and later enquired the price at which the same has been bought, to which, Noticee No. 5 informed him that he bought the shares at an average of ₹81.83. Upon perusal of the corresponding trade data of SAIL Future Contracts as provided by NSE, it is found that the trade quantity and time of trades exactly matched with contents of the phone call recordings. The trade details are presented below for reference:



Table 68

| Date       | Buy Trading Member Name          | Buy Client Name          | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Date & Time | Buy Order Limit Price | Trade Date & Time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|-----------------------|-----------------------|-------------------|----------------|-------------|
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:15      | 82                    | 26/08/2022 09:15  | 6000           | 81.75       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:15      | 82                    | 26/08/2022 09:15  | 6000           | 81.8        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:15      | 82                    | 26/08/2022 09:15  | 6000           | 81.8        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:15      | 82                    | 26/08/2022 09:15  | 6000           | 81.85       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:15      | 82                    | 26/08/2022 09:15  | 6000           | 81.85       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:15      | 82                    | 26/08/2022 09:15  | 6000           | 81.9        |
|            |                                  |                          |                |            |                |                       |                       | TOTAL             | 36000          | 81.83       |

**73.5** From the above, it is seen that the average price (₹81.83) of the executed trades is matching exactly with the price mentioned by the *Noticee No. 5* in the transcript.

**73.6** Transcript of 2<sup>nd</sup> call at 09:25 AM on Aug 26, 2022– Buy Side is given below:

*“Sanjiv – SAIL kya aa raha*

*Rajiv- SAIL aa raha hain 10 81 20*

*Sanjiv – Thik hain OK”*

From the above, it can be seen that *Noticee No. 1* called *Noticee No. 5* in a gap of 10 minutes again at 09:25 AM to enquire about the share price of SAIL, to which Rajiv replied that the scrip price was in the range of ₹81.10 – 81.20.

**73.7** Transcript of 3<sup>rd</sup> call at 09:31 AM on Aug 26, 2022– Buy Side as well as Sell Side:

*“Sanjiv – Aur SAIL dekhiyo*

*Rajiv- 82 15 20*

*Sanjiv – Lele 5 lot*

*Rajiv- laga diya*

*Sanjiv –aa gaye*

*Rajiv- 2 hi aaye , 10 se 20 main 3 aaye*

*Sanjiv – Thik hain, 83 main aaj ki selling dal diyo puri haan*

*Rajiv- aaj wali*





*Sanjiv – mane 36000 jitne liya hain na*  
*Rajiv-abhi 66 aaye hain*  
*Sanjiv –aa gaye, ab 82 90 aur 95 main dal de, thik hain*  
*Rajiv- 33 -33 hazar*  
*Sanjiv – Jitne hain*  
*Rajiv- aaj ke liye thik hain”*

**73.8** From the above, it can be seen that the *Noticee No. 1* enquired from Rajiv about the share price of SAIL and then instructed him to buy 5 more lots (one lot of SAIL FUTSTK contained 6000 shares). The *Noticee No. 1* further instructed Rajiv to place sell orders at ₹83 for the entire quantity of shares purchased during the day in the scrip SAIL signifying the intention to square off the entire positions taken earlier. Further, the squaring off of the positions as being conveyed by the *Noticee No. 1* has to be seen in the backdrop of the fact that the *Noticee No. 1* in the coming 20 minutes would be recommending the same scrip on Zee Media Channel, to the viewers at large, to buy the same scrip in which he’s asking the *Noticee No. 5* to place limit sell orders at ₹83 per share. The same can be corroborated with the trade data provided below:

Table 69

| Date       | Buy Trading Member Name          | Buy Client Name          | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Date & Time | Buy Order Limit Price | Trade Date & Time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|-----------------------|-----------------------|-------------------|----------------|-------------|
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:32      | 82.2                  | 26/08/2022 09:32  | 6000           | 82.2        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:32      | 82.2                  | 26/08/2022 09:32  | 6000           | 82.2        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:32      | 82.2                  | 26/08/2022 09:32  | 6000           | 82.2        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:32      | 82.2                  | 26/08/2022 09:32  | 12000          | 82.2        |

**73.9** Transcript of 4th call at 09:40 AM on Aug 26, 2022 – Buy Side

*“Sanjiv – SAIL Dekhiyon*  
*Rajiv- Sail... 82 5 10*  
*Sanjiv – 5 lot le .....aa gaye.?*  
*Rajiv- aa gaye*  
*Sanjiv – thik hain, ab 82 90 aur 90 main dal de*  
*Rajiv- 82 90, 95, aur 83 teeno main dal deta hoon*



*Sanjiv – nahi 82 90 aur 95 main jitna aaj liya baitha de  
Rajiv- ok”*

**73.10** From the above, it can be seen that Sanjiv Bhasin called Rajiv at 09:40 AM and enquired about the share price of SAIL. He then instructed Rajiv to buy 5 more lots. Further, it can be seen that Sanjiv Bhasin is instructing Rajiv desperately to place sell orders in the price range of ₹82.90-82.95. As per the instructions of Sanjiv Bhasin, Rajiv Kapoor placed buy orders for 5 lots at 09:40 AM. The same can be confirmed from the trade data presented below:

Table 70

| Date       | Buy Trading Member Name          | Buy Client Name          | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Date & Time | Buy Order Limit Price | Trade Date & Time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|-----------------------|-----------------------|-------------------|----------------|-------------|
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:40      | 82.15                 | 26/08/2022 09:40  | 6000           | 82.15       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:40      | 82.15                 | 26/08/2022 09:40  | 6000           | 82.15       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:40      | 82.15                 | 26/08/2022 09:40  | 6000           | 82.15       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F     | SAIL       | FUTSTK         | 26/08/2022 09:40      | 82.15                 | 26/08/2022 09:40  | 12000          | 82.15       |

**73.11** However, the sell orders as instructed by Sanjiv Bhasin in the transcript were placed but could not be executed, as per the order log data obtained from NSE, and can be seen in the below table:

Table 71

| Sell Order Date | Sell Order Time | Sell Client Name         | Sell Order no.   | Sell order original Vol | Sell order limit price | Sell LTP prior to order entry | Trade no.* |
|-----------------|-----------------|--------------------------|------------------|-------------------------|------------------------|-------------------------------|------------|
| 26/08/2022      | 09:41:38        | HB STOCKHOLDINGS LIMITED | 2400000003651700 | 42000                   | 82.9                   | 82.1                          | NULL       |
| 26/08/2022      | 09:41:45        | HB STOCKHOLDINGS LIMITED | 2400000003625940 | 54000                   | 82.95                  | 82.1                          | NULL       |

\*NULL - Indicates non-execution of trades

**73.12** Transcript of 5th call at 10:19 AM on Aug 26, 2022 – Sell Side is given below:

*“Sanjiv -... sail to tune dal rakha hain 82 90 aur 95 main  
Rajiv- haan aaj ka  
Sanjiv – aaj ka... thik hain”*



**73.13** Transcript of 6th call at 10:40 AM on Aug 26, 2022 – Sell Side is given below:

*“Sanjiv – 36000 sail bech de 60 paise main*

*Rajiv- bik raha hain*

*Sanjiv -...aur wo bik gaye 36000*

*Rajiv- haan wo bik gaye*

*Sanjiv – haan upar ke sare cancel kar de....36000 aur laga de 75 paise main aur baki laga de 80 paise main*

*Rajiv-...thik hain ...ye bhi bik gaya*

*Sanjiv – baki laga de... bik gaye...kitne rah gaye 24*

*Rajiv- haan 24 rah gaye the.... usme se ek lot chala gaya*

*Sanjiv -...Sail bik gaya ...*

*Rajiv- Sail... ek lot rah gaya bus ...*

*Sanjiv – aaj ka lot bik gaya na rajiv*

*Rajiv- haan aaj ka ek lot rah gaya bus*

*Sanjiv – wo ek lot 70 me kar de yaar... jaane de ...70 karke bech de*

*Rajiv- ...63000*

*Sanjiv- thik hai...”*

**73.14** From the above, it can be seen that Sanjiv Bhasin called Rajiv at 10:40 AM and instructed Rajiv to place sell orders for the quantity of 36000 at ₹82.60. Subsequently, Rajiv confirmed that the sell order got executed. Upon perusal of the trade data of SAIL Future Contracts as provided by NSE, it is evident that the trade quantity, price and time of the trades are matching exactly with the contents of the transcripts:

Table 72

| Date       | Sell Trading Member Name         | Sell Client Name         | Sell Client PAN | Sell Symbol | Sell Instrument | Sell Order Date & Time | Sell Order Limit Price | Trade Date & Time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|-----------------|-------------|-----------------|------------------------|------------------------|-------------------|----------------|-------------|
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:40       | 82.6                   | 26/08/2022 10:40  | 12000          | 82.6        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:40       | 82.6                   | 26/08/2022 10:40  | 6000           | 82.6        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:40       | 82.6                   | 26/08/2022 10:40  | 18000          | 82.6        |



**73.15** Further, Sanjiv Bhasin informed Rajiv to cancel all pending sell orders of the remaining lots and instructed him to place sell orders for 36000 shares at ₹82.75 and the remaining (*i.e.* 24000 shares) at ₹82.80. To which Rajiv confirmed that the sell order placed for 36000 shares at ₹82.75 got executed and the one placed at ₹82.80 got executed for 18000 shares and one lot (6000 shares) is remaining. The same can be confirmed from the trade data presented below:

Table 73

| Date       | Sell Trading Member Name         | Sell Client Name         | Sell Client PAN | Sell Symbol | Sell Instrument | Sell Order Date & Time | Sell Order Limit Price | Trade Date & Time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|-----------------|-------------|-----------------|------------------------|------------------------|-------------------|----------------|-------------|
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.75                  | 26/08/2022 10:41  | 6000           | 82.75       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.75                  | 26/08/2022 10:41  | 6000           | 82.75       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.75                  | 26/08/2022 10:41  | 6000           | 82.75       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.75                  | 26/08/2022 10:41  | 6000           | 82.75       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.75                  | 26/08/2022 10:41  | 12000          | 82.75       |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.8                   | 26/08/2022 10:41  | 6000           | 82.8        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.8                   | 26/08/2022 10:41  | 6000           | 82.8        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:41       | 82.8                   | 26/08/2022 10:41  | 6000           | 82.8        |
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL        | FUTSTK          | 26/08/2022 10:42       | 82.7                   | 26/08/2022 10:42  | 6000           | 82.7        |

**73.16** Later, Sanjiv Bhasin instructed Rajiv to place sell order for the remaining one lot (*i.e.* 6000 shares) at ₹82.70. The same can be confirmed from the trade data presented below:

Table 74

| Date       | Sell Trading Member Name         | Sell Client Name         | Sell Client PAN | sell_sym | sell_intr | Sell Order Date & Time | Trade Qty | Trade Price | Trade Date & Time |
|------------|----------------------------------|--------------------------|-----------------|----------|-----------|------------------------|-----------|-------------|-------------------|
| 26/08/2022 | RRB MASTER SECURITIES DELHI LTD. | HB STOCKHOLDINGS LIMITED | AAACH0637F      | SAIL     | FUTSTK    | 26/08/2022 10:42       | 6000      | 82.7        | 26/08/2022 10:42  |

**73.17** For the sake of clarity, a table detailing calls between Sanjiv Bhasin and Rajiv Kapoor vis-à-vis order placement is given in the below table:

Table 75

| Call Time | Order Time | Particulars                                                                                                      | Shares Inventory |
|-----------|------------|------------------------------------------------------------------------------------------------------------------|------------------|
| 09:14     |            | Sanjiv Bhasin instructed Rajiv Kapoor to buy 36000 shares of SAIL ( <i>i.e.</i> 1 lot of SAIL FUT = 6000 shares) |                  |
|           | 09:15      | Rajiv Kapoor placed buy orders for 36000 shares at an average price of ₹81.83                                    | 36000            |



|                                                                                                                                                                         |       |                                                                                                                                                                                                                                               |        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 09:25                                                                                                                                                                   |       | Sanjiv Bhasin enquired Rajiv the share price of SAIL, to which Rajiv replied that the price is in the range of ₹81.10 – 81.20. No order was executed during this call.                                                                        |        |
| 09:31                                                                                                                                                                   |       | Sanjiv Bhasin instructed Rajiv Kapoor to buy 5 lots                                                                                                                                                                                           |        |
|                                                                                                                                                                         | 09:32 | Rajiv Kapoor placed buy orders for 5 lots (30000 shares) at ₹82.20                                                                                                                                                                            | 30000  |
|                                                                                                                                                                         |       | Sanjiv Bhasin instructed Rajiv Kapoor to place sell orders for the entire quantity (66000 shares) at ₹83                                                                                                                                      |        |
|                                                                                                                                                                         |       | As per trade log, it appears that no sell order was executed                                                                                                                                                                                  |        |
| 09:40                                                                                                                                                                   |       | Sanjiv Bhasin instructed Rajiv Kapoor to buy 5 lots                                                                                                                                                                                           |        |
|                                                                                                                                                                         | 09:40 | Rajiv Kapoor placed buy orders for 5 lots (30000 shares) at ₹82.15                                                                                                                                                                            | 30000  |
|                                                                                                                                                                         |       | Sanjiv Bhasin instructed Rajiv Kapoor to place sell orders in the price range of ₹82.90 to ₹82.95                                                                                                                                             |        |
|                                                                                                                                                                         |       | As per trade log, it appears that sell orders were placed, however, no sell order was executed                                                                                                                                                |        |
| 10:19                                                                                                                                                                   |       | Sanjiv Bhasin enquired from Rajiv whether Sell orders have been placed at the price range of ₹82.90 to ₹82.95.                                                                                                                                |        |
| 10:40                                                                                                                                                                   |       | Sanjiv Bhasin instructed Rajiv Kapoor to place sell orders for 36000 shares at ₹82.60                                                                                                                                                         |        |
|                                                                                                                                                                         | 10:40 | As instructed, Rajiv Kapoor placed sell orders for 36000 shares at ₹82.60                                                                                                                                                                     | -36000 |
|                                                                                                                                                                         |       | Sanjiv Bhasin instructed Rajiv Kapoor to place sell orders for 36000 shares at ₹82.75 and the remaining (24000) shares at ₹82.80                                                                                                              |        |
|                                                                                                                                                                         | 10:41 | Rajiv Kapoor placed sell orders for 36000 shares at ₹82.75 and 24000 shares at ₹82.80. However, for the trade placed at ₹82.80, only 18000 shares got sold. Hence, Rajiv informed Sanjiv Bhasin that one more lot (6000 shares) is remaining. | -54000 |
|                                                                                                                                                                         |       | Sanjiv Bhasin then instructed Rajiv to place sell order for the remaining lot at ₹82.70                                                                                                                                                       |        |
|                                                                                                                                                                         | 10:42 | As instructed, Rajiv Kapoor placed sell order for 1 lot (6000 shares) at ₹82.70                                                                                                                                                               | -6000  |
| From the above, it can be seen that Sanjiv Bhasin squared off his entire position of 96000 shares in the scrip SAIL post his recommendation to BUY in the news channel. |       |                                                                                                                                                                                                                                               |        |

**73.18** On a detailed analysis of the above trading pattern, it can be seen that Sanjiv Bhasin carried out the first leg of transaction *i.e.* Buy trades in the scrip between 09:15 AM to 09:40 AM, which was prior to his recommendation at 09:52 AM, at an average price of ₹82.04 per share. The orders were placed by Rajiv as per his constant instructions, which included exact price and quantity, and Rajiv just followed the instructions. The price and quantity details as communicated to Rajiv by Sanjiv Bhasin exactly matched with the order placement made in the scrip, as outlined hereinabove.

**73.19** Subsequently, Sanjiv Bhasin appeared on ZEE Business channel at 09:52 AM and recommended to the viewers to buy SAIL with a target



price of ₹90 per share when the CMP was ₹82.30 per share. It can be seen that post his recommendation, there was significant price and volume impact on the scrip of SAIL.

**73.20** He utilised the momentum and instructed Rajiv Kapoor to place sell trades contrary to his own recommendation immediately after/during the recommendation. By virtue of carrying out these trades, a profit of ₹63,000 was made in the scrip of SAIL.

**73.21** Investigation also revealed that certain connected/related entities privy to the order placement in the trading account HB Stockholdings such as Babita Gupta (*Noticee No. 12*), Leo Portfolios Pvt Ltd (*Noticee No. 11*), Rajiv Kapoor (*Noticee No. 5*) and Jagat Singh (*Noticee No. 6*) also placed orders in the scrip of SAIL around the same time and followed the same trading pattern as of Sanjiv Bhasin and made profit. It can be seen that, similar to the trades carried out by HB, all other aforesaid *Noticees* also followed the same trading methodology *i.e.* creating position in the same scrip before the recommendation and squaring-off the position afterwards. A brief analysis of trades of these *Noticees* vis –a-vis trades of Sanjiv Bhasin through the account of HB are as follows:

Table 76

| Analysis of trades carried out by the clients in the scrip "SAIL"                 |            |                 |               |                 |                 |                      |                   |               |                  |                 |                      |          |
|-----------------------------------------------------------------------------------|------------|-----------------|---------------|-----------------|-----------------|----------------------|-------------------|---------------|------------------|-----------------|----------------------|----------|
| Date and Recommendation time – Aug 26, 2022, 09:52 AM<br>(Contract- SAIL22SEPFUT) |            |                 |               |                 |                 |                      |                   |               |                  |                 |                      |          |
| Client Name                                                                       | PAN        | Buy (First Leg) |               |                 |                 |                      | Sell (Second Leg) |               |                  |                 |                      | Profit ₹ |
|                                                                                   |            | Order Time      | Trade Time    | Buy Price Range | Traded Quantity | Total Value Traded ₹ | Order Time        | Trade Time    | Sell Price Range | Traded Quantity | Total Value Traded ₹ |          |
| HB Stockholdings Limited                                                          | AAACH0637F | 09:15 – 09:40   | 09:15 – 09:40 | 81.75 – 82.15   | 96000           | 7876200              | 10:40 – 10:42     | 10:40 – 10:42 | 82.60 – 82.80    | 96000           | 7939200              | 63000    |
| Babita Gupta                                                                      | AAEPG1745N | 09:32 – 09:43   | 09:32 – 09:44 | 82.15           | 12000           | 985800               | 09:52 – 09:53     | 09:54         | 82.40 – 82.50    | 12000           | 989400               | 3600     |
| Rajiv Kapoor                                                                      | ARSPK9663Q | 09:35           | 09:37         | 82.05           | 6000            | 492300               | 09:53             | 10:36         | 82.55            | 6000            | 495300               | 3000     |
| Jagat Singh                                                                       | BSRPS9870C | 09:37 – 09:41   | 09:38 – 09:42 | 82.05 – 82.10   | 24000           | 1969800              | 09:53             | 09:53 –       | 82.40            | 24000           | 1977600              | 7800     |



|                                |            |       |       |       |       |        |       |       |       |       |        |      |
|--------------------------------|------------|-------|-------|-------|-------|--------|-------|-------|-------|-------|--------|------|
|                                |            |       |       |       |       |        |       | 09:54 |       |       |        |      |
| Leo Portfolios Private Limited | AAACL2384F | 09:43 | 09:44 | 82.15 | 12000 | 985800 | 10:43 | 10:43 | 82.65 | 12000 | 991800 | 6000 |

74. As per the trade log data, the trading member details of *Noticees* are as under:

Table 77

| Broker wise order placement details |                                 |                  |              |
|-------------------------------------|---------------------------------|------------------|--------------|
| Client Name                         | Trading Member Name             | CTCL ID          | Dealer Name  |
| HB Stockholdings Ltd                | RRB Master Securities Delhi Ltd | 110001001005110  | Dealer 1     |
| Babita Gupta                        | Zerodha Broking Ltd             | 333333333333100  | IBT*         |
| Jagat Singh                         | Zerodha Broking Ltd             | 1111111111111100 | IBT*         |
| Rajiv Kapoor                        | SMC Global Securities Ltd       | 333333333333110  | IBT*         |
| Leo Portfolios Private Limited      | RRB Master Securities Delhi Ltd | 110034002008110  | Ashish Kapur |

\*IBT- Internet Based Trading

**74.1** As already enumerated in the illustration of LTTS Future dated January 11, 2022 in the preceding paras, the *Noticee No. 7* followed similar trading pattern in the instant scrip of SAIL Futures also. Investigation revealed that the *Noticee No. 7* being privy to trades of *Noticee No. 1* being placed through dealers of RRB Master either had received the order related information from Sanjiv Bhasin and/or being in close proximity to the location of *Noticee No. 5*, who placed trades as per instructions of the *Noticee No. 1*, in the instant matter, had carried similar fraudulent trades through the trading account of his wife *Noticee No. 12* by placing two buy orders of 6000 shares each at 09:32 AM and 09:43 AM, respectively. The orders got executed at the same time. Further, upon perusal of the trade data, it was observed that all 12000 shares were squared off at 09:54 AM (*i.e.* immediately post the recommendation of Sanjiv Bhasin on Zee Media Channel).





**74.2** On the basis of the information received from Sanjiv Bhasin, after placing orders in the trading account of HB, investigation revealed that the *Noticee No. 5* also placed the buy orders for 6000 shares at 09:35 AM (reference may also be drawn to three transcripts earlier at 09:14 AM, 09:25 AM and 09:31 AM, through which the *Noticee No. 5* was placing orders in account of HB), in his own trading account held with broker SMC Global Securities Ltd. Further, upon perusal of the trade data, it was observed that he squared off his entire position at 10:36 AM (*i.e.* post the recommendation of Sanjiv Bhasin at 09:52 AM), and earned profit of ₹3,000. With regard to trades carried out by the *Noticee No. 5* in the trading account of HB as per the instructions of *Noticee No. 1*, Dealer 1, in his statement recorded under oath on June 13, 2024, stated that though he was aware of the Terminal ID allotted to him, he had never placed any orders through this terminal. In view of the aforesaid statement of Dealer 1, it can be *prima facie* inferred that though the Terminal was in the name of Dealer 1, it was used by other dealers to place trade orders.

**74.3** As shown in the illustration of LTTS Future dated January 11, 2022 in the preceding paras, the *Noticee No. 6* also followed similar trading strategy in the instant scrip of SAIL Futures in his own trading account, and placed the orders in his trading account through broker Zerodha using IBT. Accordingly, from the trade log data, it can be seen that the *Noticee No. 6* placed buy orders of SAIL FUTSTK for 12000 shares each at 09:37 AM and 09:41 AM, respectively, just prior to the recommendation made by Sanjiv Bhasin in news channel and later squared off his entire position at 09:53 AM (*i.e.* soon after the recommendation) and earned profit of ₹7,800.

**74.4** Similarly, investigation revealed that similar trading strategy was also implemented in the trading account of the *Noticee No. 11*, Leo in the instant scrip of SAIL Future. Buy orders were placed for 12000 shares at





09:43 AM and later its entire position was squared off at 10:43 AM (*i.e.* post recommendation of Sanjiv Bhasin). It may be noted that the trades were placed through the CTCL ID 110034002008110 issued in the name of the *Noticee No. 3*, Ashish Kapur who was the MD of RRB Master. On the basis of the investigation and the material available on record, it can be reasonably inferred that the *Noticee No. 3* allowed *Noticee No. 5* to mirror the orders of Sanjiv Bhasin in the scrip of SAIL Future and place the orders in the trading account of Leo Portfolios Pvt Ltd.

75. Accordingly, it is seen that HB and four other Profit Makers, made a cumulative profit of ₹83,400 by mirroring trades of the *Noticee No. 1* in the scrip of SAIL.

#### F.5 Illustration of Recommendation on ZEE Business news channel- GODREJCP

76. On September 13, 2022, Sanjiv Bhasin made a guest appearance on Zee Business news channel in the show “**Bhasin ke hasin share**”. At 13:35 PM, he recommended to buy futures of Godrej Consumer Products Ltd (scrip code “**GODREJCP**”). A snapshot of his appearance on the news channel recommending to buy GODREJCP is provided below:

Figure 13





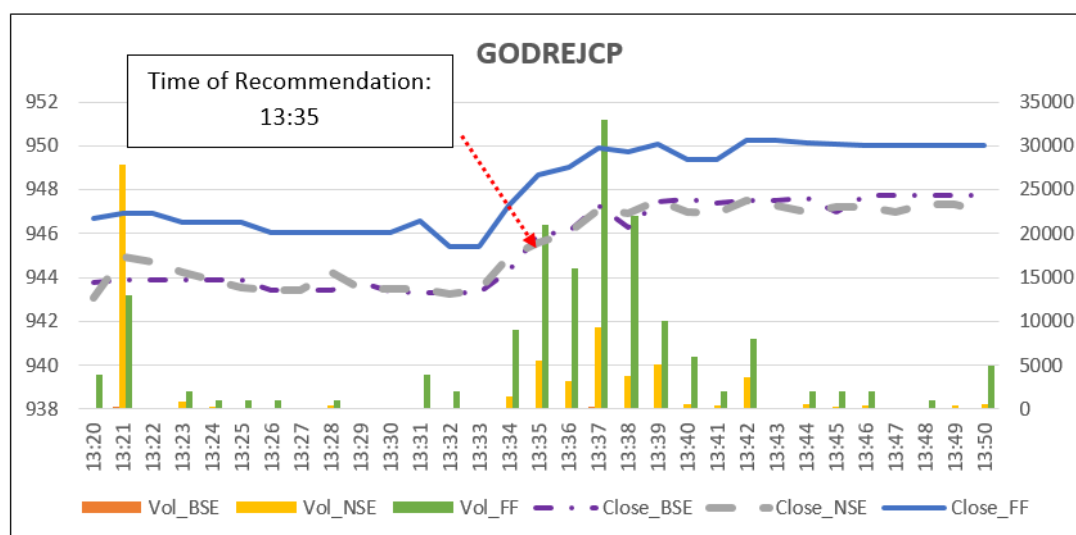
77. From the above, it can be seen that the *Noticee No. 1* has recommended the following w.r.t. the scrip of GODREJCP:

Table 78

| Date               | Scrip Name & Code                         | CMP     | Target Price | Stop Loss | Recommendation |
|--------------------|-------------------------------------------|---------|--------------|-----------|----------------|
| September 13, 2022 | Godrej Consumer Products Ltd ("GODREJCP") | ₹948.30 | ₹1020        | ₹925      | BUY            |

78. The price and volume chart, during 15 minutes pre and post the recommendation time (*i.e.* 13:35 PM) in the scrip of "GODREJCP" in BSE Equity Cash segment, NSE equity cash segment and NSE Futures is given below:

Figure 14



79. It can be seen that a significant impact on the price and the trading volume of the scrip was observed post the recommendation in the show, the details of which are given in the table below:

Table 79

|                               |                  |                                  |
|-------------------------------|------------------|----------------------------------|
| Recommendation date           |                  | September 13, 2022               |
| Recommendation time (t)       |                  | 13:35                            |
| Scrip/Contract Recommended    |                  | GODREJCP                         |
| Recommended Levels (For Cash) | CMP (₹)          | 948.30                           |
|                               | Target Price (₹) | 1020                             |
|                               | Stop Loss (₹)    | 925                              |
| Scrip/Contract                |                  | Godrej Consumer Products Limited |



|                                                                                                   |                                                                                                                   | BSE (EQ) | NSE (EQ) | NSE (FF) |
|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|----------|----------|----------|
| <b>Price Impact Post Recommendation</b>                                                           | Average High/ Low Variation % in preceding 15 mins [t-15]                                                         | 0.01%    | 0.08%    | 0.04%    |
|                                                                                                   | Average High/ Low Variation % during recommendation time and succeeding 2 mins [t and t+2]                        | 0.09%    | 0.16%    | 0.14%    |
|                                                                                                   | Average High/ Low Variation % in succeeding 15 mins [t+15]                                                        | 0.02%    | 0.08%    | 0.05%    |
| <b>Volume Impact Post Recommendation</b>                                                          | Avg Trading Vol in Preceding 15 mins [t-15] (number of shares/underlying shares)                                  | 30.26    | 2122     | 2533.33  |
|                                                                                                   | Avg Trading Vol during recommendation time and succeeding 2 mins [t and t+2] (number of shares/underlying shares) | 130      | 6000.33  | 23333.33 |
|                                                                                                   | Avg Trading Vol for succeeding 15 mins [t+15] (number of shares/underlying shares)                                | 45.20    | 1918.46  | 7266.67  |
| Relevant Price Sensitive Corporate Announcement on the day of the recommendation or the prior day |                                                                                                                   | NA       |          |          |

**80.** The analysis of the price impact in the scrip shows the following:

- In the preceding 15 minutes before the recommendation, the average high/low price variation was at 0.01%, 0.08%, 0.04% for GODREJCP scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- However, during the recommendation time and the subsequent 2 minutes (t and t+2), there was a significant surge in price volatility, with an average high/low variation of 0.09%, 0.16% and 0.14% for GODREJCP scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- In the succeeding 15 minutes (t+15) after the recommendation, the average high/low variation stood at 0.02%, 0.08%, 0.05% for GODREJCP scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.



**81.** An analysis of the volume impact in the scrip shows the following:

- i. The average trading volume in the 15 minutes leading up to the recommendation (t-15) was 30.26 shares, 2122 shares and 2533.33 shares for GODREJCP scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- ii. During the recommendation time and the following 2 minutes (t and t+2), the trading volume experienced a substantial increase, reaching an average of 130 shares, 6000.33 shares, and 23333.33 shares for GODREJCP scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.
- iii. In the succeeding 15 minutes (t+15) after the recommendation, the average trading volume stood at 45.20 shares, 1918.46 shares and 7266.67 shares for GODREJCP scrip at BSE (EQ), NSE (EQ) and NSE (Future) respectively.

**82.** It may be noted that there were no relevant price-sensitive corporate announcements around the time of recommendation, which could explain the sudden rise in price and volume in the scrip of GODREJCP.

**83.** Investigation revealed that the *Noticee No. 1* had traded in the scrip of GODREJCP on the recommendation date (*i.e.* September 13, 2022), through Venus and Gemini and made a profit of ₹25,950. The following paragraphs detail the trades done in the trading account of Venus & Gemini with the same *modus operandi* as discussed in the other examples discussed above.

**83.1** Upon analysis of the evidence, it is *prima facie* observed that, before making the said recommendation on the news channel, the *Noticee No. 1* had made many phone calls to *Noticee No. 5* for placing buy orders in the scrip of GODREJCP. The summary of calls exchanged between *Noticee No. 1* and *Noticee No. 5* during the recommendation day (before and after the recommendation time of 13:35 PM), is tabulated in the below table:



Table 80

| Call details                                                                                                          | Time     | Instruction (On call) |
|-----------------------------------------------------------------------------------------------------------------------|----------|-----------------------|
| First Call                                                                                                            | 10:35 AM | Buy GODREJCP          |
| Second Call                                                                                                           | 10:47 AM | Buy GODREJCP          |
| Third Call                                                                                                            | 11:09 AM | Buy GODREJCP*         |
| Fourth Call                                                                                                           | 11:33 AM | Sell GODREJCP*        |
| Fifth Call                                                                                                            | 11:44 AM | Sell GODREJCP*        |
| Sixth Call                                                                                                            | 12:00 PM | Buy GODREJCP          |
| Seventh Call                                                                                                          | 12:14 PM | Buy GODREJCP          |
| Eighth Call                                                                                                           | 12:26 PM | Buy GODREJCP          |
| Ninth Call                                                                                                            | 12:57 PM | Sell GODREJCP*        |
| Tenth Call                                                                                                            | 13:06 PM | Sell GODREJCP#        |
| Eleventh Call                                                                                                         | 13:12 PM | Sell GODREJCP         |
| Twelfth Call                                                                                                          | 13:20 PM | Sell GODREJCP#        |
| <b>Sanjiv Bhasin Recommendation on ZEE Business TV Channel at 13:35 PM</b>                                            |          |                       |
| *As per the trade log, the orders instructed by Sanjiv Bhasin during his call were not executed.                      |          |                       |
| # Sell orders were placed during the timings of call recordings, however the orders got executed post recommendation. |          |                       |

### 83.2 Transcript of 1<sup>st</sup> call at 10:35 AM on Sep 13, 2022 – Buy Side:

*“Rajiv Kapoor – Hanji Sir*

*Sanjiv Bhasin – Ye Godrej CP dekhiyo Rajiv*

*Rajiv Kapoor – 947 – 47 - 85*

*Sanjiv Bhasin – 48 tak 5 lot le le*

*Rajiv Kapoor – aa gaye sir*

*Sanjiv Bhasin – 5 aur le le, aa gaye*

*Rajiv Kapoor – ek aaya hai*

*Sanjiv Bhasin – baki hata de, 2 - 47.65 main laga dein, 2 – 47.55 main laga dein*

*Rajiv Kapoor – theek hain ji*

*Sanjiv Bhasin – kitne aa gaye, 6000 aa gaye na*

*Rajiv Kapoor – haan ji*

*Sanjiv Bhasin – .... Vo 6000 ki kya average hain*

*Rajiv Kapoor – 947.97*

*Sanjiv Bhasin – 948, theek hain”*

### 83.3 From the above, it can be seen that Sanjiv Bhasin called Rajiv at 10.35 AM and enquired from him the price of GODREJCP. To which Rajiv



informed Sanjiv Bhasin that the price is at ₹947.85. Sanjiv Bhasin then instructed Rajiv to buy 5 lots of shares of GODREJCP till the price reaches ₹948. Rajiv informed Sanjiv Bhasin that the order for 5 lots got executed. Further, Sanjiv Bhasin instructed Rajiv to buy 5 more lots, to which Rajiv confirmed that only one lot got executed. Later Sanjiv Bhasin enquired Rajiv the number of shares and the average price at which he bought the same. To which Rajiv Kapoor informed Sanjiv Bhasin that they have bought 6000 shares at an average price of ₹947.97. It is to be noted that one lot of GODRECP FUTSTK contained 1000 shares. Upon perusal of the trade data of GODREJCP as provided by NSE, it can be confirmed that Rajiv Kapoor placed buy orders in the account of Venus, as instructed by Sanjiv Bhasin. Further, it can be seen that the trade quantity, price and time of the trades are matching exactly with the contents of the transcript. The same is presented in the table below for reference:

Table 81

| Trade_Date | Buy Trading Member Name          | Buy Client Name          | Buy Client PAN | Buy Symbol | Buy Instrume | Buy Order Time | Buy order | Trade time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|--------------|----------------|-----------|------------|----------------|-------------|
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut          | 10:36:09       | 948       | 10:36:09   | 1000           | 947.9       |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut          | 10:36:09       | 948       | 10:36:09   | 1000           | 947.9       |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut          | 10:36:09       | 948       | 10:36:09   | 1000           | 948         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut          | 10:36:09       | 948       | 10:36:09   | 2000           | 948         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut          | 10:36:16       | 948       | 10:36:19   | 1000           | 948         |
|            |                                  |                          |                |            |              |                |           | TOTAL      | 6000           | 947.96      |

#### **83.4 Transcript of 2<sup>nd</sup> call at 10:47 AM on Sep 13, 2022 – Buy Side**

*“Rajiv Kapoor – Hanji sir*

*Sanjiv Bhasin – Wo 6000 hi aaye hain na*

*Rajiv Kapoor – 6000 hain ji*

*Sanjiv Bhasin – Wo niche karde buying uski, 4665 – 4655 kar de, 47 ki jagah, ek rupee niche*

*Rajiv Kapoor – Theek hain”*

As per the instructions of Sanjiv Bhasin, Rajiv Kapoor placed buy orders for 2 lots each at ₹946.65 and ₹946.55 respectively in the account of





Venus. The same can be confirmed from the trade data presented in the below table:

Table 82

| Trade_Date | Buy Trading Member Name          | Buy Client Name          | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Time | Buy order Price | Trade time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|----------------|-----------------|------------|----------------|-------------|
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut            | 10:48:15       | 946.65          | 11:02:01   | 2000           | 946.65      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut            | 10:48:07       | 946.55          | 11:02:01   | 1000           | 946.55      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut            | 10:48:07       | 946.55          | 11:02:01   | 1000           | 946.55      |

### 83.5 Transcript of 3<sup>rd</sup> call at 11:09 AM on Sep 13, 2022 – Buy Side

*“Sanjiv Bhasin – kya aa rahi yaar, Jindal, JSW or Godrej  
Rajiv Kapoor – 47.50 aa raha hain Godrej  
Sanjiv Bhasin – Hamare lage hain na 65 – 55 main  
Rajiv Kapoor – Wo aa gaye the wo to  
Sanjiv Bhasin – 10000 ho gaye hamare  
Rajiv Kapoor – haan ji  
Sanjiv Bhasin – 10000 ki kya average hain Rajiv  
Rajiv Kapoor – 47.42 paise  
Sanjiv Bhasin – theek hain, 4000 aur laga dein, 44.65 – 44.55 main,  
Rajiv Kapoor – theek hain...”*

**83.6** From the above, it can be seen that Sanjiv Bhasin enquired from Rajiv Kapoor whether he has placed buy orders at ₹946.65 and ₹946.55, to which Rajiv informed Sanjiv Bhasin that those orders got executed. Subsequently, Sanjiv Bhasin confirmed whether they have bought 10000 shares of GODREJCP till now and enquired the average share price at which they have bought. Rajiv informed Sanjiv Bhasin that the average price is ₹947.42. Further, Sanjiv Bhasin instructed Rajiv to place buy orders for 4000 shares at ₹944.55 to ₹944.65. As per order log as obtained from NSE, it can be seen that, Rajiv Kapoor as instructed by Sanjiv Bhasin, placed buy orders in the account of Venus for 2000 shares each at ₹944.55 and ₹944.65 respectively. However, since the CMP was



higher than the buy order limit price, the orders didn't get executed. The order details are furnished below:

Table 83

| Buy Order Date | Buy Order Time | Buy Client Name          | Buy Order no.    | Buy order original Vol | Buy order limit price | Buy LTP prior to order entry | Buy LTP prior to order mod | Trade no.* |
|----------------|----------------|--------------------------|------------------|------------------------|-----------------------|------------------------------|----------------------------|------------|
| 13/09/2022     | 11:09:56       | VENUS PORTFOLIOS PVT LTD | 2500000016022320 | 2000                   | 944.65                | 948                          | 948                        | NULL       |
| 13/09/2022     | 11:10:01       | VENUS PORTFOLIOS PVT LTD | 2500000016032540 | 2000                   | 944.55                | 948                          | 948                        | NULL       |

\*NULL - Indicates non-execution of trades

### **83.7 Transcript of 4<sup>th</sup> call at 11:33 AM on Sep 26, 2022 – Sell Side**

“Sanjiv Bhasin – Aawaj aa rahi hain,  
Rajiv Kapoor – aa rahi hain  
Sanjiv Bhasin – Godrej CP kya aa raha hain  
Rajiv Kapoor – 48.60 – 48.45  
Sanjiv Bhasin – aur hamari kya average hain  
Rajiv Kapoor – 47.42  
Sanjiv Bhasin – 49.25-30-35 main 1000 – 1000 laga de... 25-30-35- main  
1000 -1000 laga de.... aur 45 main bhi laga de  
Rajiv Kapoor – ok  
Sanjiv Bhasin – Bika kuch Godrej  
Rajiv Kapoor – nahi abhi kuch nahi  
Sanjiv Bhasin – 49 above 5000 tho bech diyo  
Rajiv Kapoor – theek hain”

**83.8** From the above, it is seen that Sanjiv Bhasin instructed Rajiv to place sell orders for 1000 shares each at ₹949.25, ₹949.30, ₹949.35 and ₹949.45. Subsequently, Sanjiv Bhasin enquired from Rajiv whether any sell order got executed; to which Rajiv replied that no sell orders in the given price range got executed yet. Thereafter, Sanjiv Bhasin instructed Rajiv to place sell orders at a price of ₹949 or above for 5000 shares. As per order log, it can be seen that the sell orders as instructed by Sanjiv Bhasin were placed by Rajiv Kapoor in the account of Venus at the





respective price limits. The order details clearly show Sanjiv Bhasin's intention to dispose-off the shares of GODREJCP on the same day, which is contrary to his recommendation ("BUY") on the news channel. However, since the CMP was lesser than the sell order limit price, the orders didn't get executed. The order details are provided below:

Table 84

| Sell Order Date | Sell Order Time | Sell Client Name         | Sell Order no.   | Sell order original Vol | Sell order limit price | Sell LTP prior to order entry | Sell LTP prior to order mod | Trade no.* |
|-----------------|-----------------|--------------------------|------------------|-------------------------|------------------------|-------------------------------|-----------------------------|------------|
| 13/09/2022      | 11:34:10        | VENUS PORTFOLIOS PVT LTD | 2500000018948900 | 1000                    | 949.25                 | 948.6                         | 948.6                       | NULL       |
| 13/09/2022      | 11:34:16        | VENUS PORTFOLIOS PVT LTD | 2500000018957340 | 1000                    | 949.3                  | 948.6                         | 948.6                       | NULL       |
| 13/09/2022      | 11:34:24        | VENUS PORTFOLIOS PVT LTD | 2500000018975390 | 1000                    | 949.35                 | 948.6                         | 948.6                       | NULL       |
| 13/09/2022      | 11:34:29        | VENUS PORTFOLIOS PVT LTD | 2500000018987390 | 1000                    | 949.4                  | 948.6                         | 948.6                       | NULL       |

\*NULL - Indicates non-execution of trades

### **83.9 Transcript of 5<sup>th</sup> call at 11:44 AM on Sep 13, 2022 – Sell Side**

*"Sanjiv Bhasin – Bik gaye wo kuch*

*Rajiv Kapoor – nahi sir, 46.35-46.95*

*Sanjiv Bhasin – hum dalte he order niche aa jata hain, kuch bhi nahi bika*

*Rajiv Kapoor – kuch bhi nahi*

*Sanjiv Bhasin – ye buying hata de iski niche jo dal rakhi hain*

*Rajiv Kapoor – aacha ji"*

### **83.10 Transcript of 6<sup>th</sup> call at 12:00 PM on Sep 13, 2022 – Buy Side**

*"Sanjiv Bhasin – kya hai Godrej*

*Rajiv Kapoor – 46.50 - 47.40*

*Sanjiv Bhasin – Godrej niche kya bika hain*

*Rajiv Kapoor – 943.80*

*Sanjiv Bhasin – Abhi kya hain 45*

*Rajiv Kapoor – Abhi hain 46.55 – 47.40*

*Sanjiv Bhasin – Aur spot main kya hain Rajiv*

*Rajiv Kapoor – 944.50 - 945*

*Sanjiv Bhasin – Aur 46.5 kya bhav hain*

*Rajiv Kapoor – Abhi Hanji 46.50 – 47.50*



*Sanjiv Bhasin – 44.65 aur 44.55 main 2000-2000 dal de”*

**83.11** From the above, it can be seen that Sanjiv Bhasin enquired the current market price of GODREJCP, to which Rajiv informed him that the share price is at ₹944.50 – 945. Subsequently, Sanjiv Bhasin instructed Rajiv to place buy orders for 2000 shares at ₹944.65 and another 2000 shares at ₹944.55. As per the instructions of Sanjiv Bhasin, Rajiv Kapoor placed buy orders for 2 lots each at ₹944.65 and ₹944.55 respectively in the account of Gemini. The same can be confirmed from the trade data presented in the below table:

Table 85

| Trade_Date | Buy Trading Member Name          | Buy Client Name                   | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Time | Buy order Price | Trade time | Trade Quantity | Trade Price |
|------------|----------------------------------|-----------------------------------|----------------|------------|----------------|----------------|-----------------|------------|----------------|-------------|
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | GEMINI PORTFOLIOS PRIVATE LIMITED | AAACG4847Q     | GODREJCP   | Fut            | 12:01:54       | 944.65          | 12:15:14   | 1000           | 944.65      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | GEMINI PORTFOLIOS PRIVATE LIMITED | AAACG4847Q     | GODREJCP   | Fut            | 12:01:54       | 944.65          | 12:15:14   | 1000           | 944.65      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | GEMINI PORTFOLIOS PRIVATE LIMITED | AAACG4847Q     | GODREJCP   | Fut            | 12:02:08       | 944.55          | 12:15:22   | 2000           | 944.55      |

#### **83.12 Transcript of 7<sup>th</sup> call at 12:14 PM on Sep 13, 2022 – Buy Side**

*“Sanjiv Bhasin – Wo Godrej Kya aa raha hain*

*Rajiv Kapoor – 44.80 – 45.30*

*Sanjiv Bhasin – Godrej aaya niche wala apna*

*Rajiv Kapoor – Shuru ho gaye, 44 wale aa gaye*

*Sanjiv Bhasin – very good, 43.65 – 44.55 main bhi dal de, theek de*

*Rajiv Kapoor – 44.55 wale bhi aa gaye, aur ab main 43.65 aur 43.55 main laga raha hun 2- 2”*

**83.13** From the above, it can be seen that Sanjiv Bhasin enquired the current market price of GODREJCP, to which Rajiv informed him that the share price is at ₹944.80 – 945.30. Subsequently, Sanjiv Bhasin instructed Rajiv to place buy orders at ₹943.65 and ₹944.55. Rajiv informed Sanjiv Bhasin that the buy orders placed at ₹944.55 got executed and he is about to place buy orders for 2 lots each at ₹943.65 and ₹943.55. Upon perusal of the trade data, it can be seen that the contents of the phone



recordings are exactly matching with the trade data of Venus. As instructed by Sanjiv Bhasin, Rajiv Kapoor placed 2 buy orders for 2 lots each at ₹943.65 and ₹943.55. However, upon perusal of the trade data, it can be seen that out of 2 buy orders placed, only one buy order placed at the price of ₹943.65 was executed. The trade data and order log data are presented in the below tables:

Table 86

| Trade_Date | Buy Trading Member Name          | Buy Client Name          | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Time | Buy order Price | Trade time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|----------------|------------|----------------|----------------|-----------------|------------|----------------|-------------|
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R     | GODREJCP   | Fut            | 12:15:41       | 943.65          | 12:21:14   | 2000           | 943.65      |

Table 87

| Buy Order Date | Buy Order Time | Buy Client Name          | Buy Order no.    | Buy order original Vol | Buy order limit price | Buy LTP prior to order entry | Buy LTP prior to order mod | Trade no.* |
|----------------|----------------|--------------------------|------------------|------------------------|-----------------------|------------------------------|----------------------------|------------|
| 13/09/2022     | 12:15:34       | VENUS PORTFOLIOS PVT LTD | 2500000023453150 | 2000                   | 943.55                | 945.35                       | 945.35                     | NULL       |

\*NULL - Indicates non-execution of trades

#### 83.14 Transcript of 8<sup>th</sup> call at 12:26 PM on Sep 13, 2022 – Buy Side

*“Sanjiv Bhasin – kya aaya Rajiv, Kitna aaya*

*Rajiv Kapoor – 16000*

*Sanjiv Bhasin – Kya average hain*

*Rajiv Kapoor – 46.24*

*Sanjiv Bhasin – Aur kya hain...”*

**83.15** From the above, it can be seen that Sanjiv Bhasin enquired from Rajiv about the total number of shares bought till now and the average price of the same. To which Rajiv informed Sanjiv Bhasin he had bought 16000 shares and the average buy price was ₹946.24 per share. The same is confirmed with the trade log shown in the table below:



Table 88

| Trade Date | Buy Trading Member Name          | Buy Client Name                   | Buy Client PAN | Buy Symbol | Buy Instrument | Buy Order Time | Buy order Price | Trade time | Trade Quantity | Trade Price |
|------------|----------------------------------|-----------------------------------|----------------|------------|----------------|----------------|-----------------|------------|----------------|-------------|
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:36:09       | 948             | 10:36:09   | 1000           | 947.9       |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:36:09       | 948             | 10:36:09   | 1000           | 947.9       |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:36:09       | 948             | 10:36:09   | 1000           | 948         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:36:09       | 948             | 10:36:09   | 2000           | 948         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:36:16       | 948             | 10:36:19   | 1000           | 948         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:48:15       | 946.65          | 11:02:01   | 2000           | 946.65      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:48:07       | 946.55          | 11:02:01   | 1000           | 946.55      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 10:48:07       | 946.55          | 11:02:01   | 1000           | 946.55      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | GEMINI PORTFOLIOS PRIVATE LIMITED | AAACG4847Q     | GODREJCP   | Fut            | 12:01:54       | 944.65          | 12:15:14   | 1000           | 944.65      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | GEMINI PORTFOLIOS PRIVATE LIMITED | AAACG4847Q     | GODREJCP   | Fut            | 12:01:54       | 944.65          | 12:15:14   | 1000           | 944.65      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | GEMINI PORTFOLIOS PRIVATE LIMITED | AAACG4847Q     | GODREJCP   | Fut            | 12:02:08       | 944.55          | 12:15:22   | 2000           | 944.55      |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD          | AAACV4306R     | GODREJCP   | Fut            | 12:15:41       | 943.65          | 12:21:14   | 2000           | 943.65      |
|            |                                  |                                   |                |            |                |                |                 | TOTAL      | 16000          | 946.24      |

### 83.16 Transcript of 9<sup>th</sup> call at 12:57 PM on Sep 13, 2022 – Sell Side

*“Sanjiv Bhasin – 47.20 main bhi 2 laga de godrej, 47.30 main 2, 47.40 main 2 laga de, aur ek tune laga rakha hain 47 main*

*Rajiv Kapoor – hanji*

*Sanjiv Bhasin – tho 7 ho gaye, 47.80 - 85 - 90 main bhi 2-2 laga de*

*Rajiv Kapoor – 80-85-90 main, theek hain ji*

*Sanjiv Bhasin – 6-6, 12 aur ek 13*

*Rajiv Kapoor – main dekh leta hu sir*

*Sanjiv Bhasin – theek hai ok”*

**83.17** From the above, it can be seen that Sanjiv Bhasin instructed Rajiv to place sell orders for 2 lots each at ₹947.20, ₹947.30 and ₹947.40 and also he enquired whether Rajiv had already placed one sell order for 1 lot at ₹947. Further, Sanjiv Bhasin informed that once 7 lots are sold, place orders for 4 lots in the price range of ₹947.80 – 947.90. From the transcript above, it is clear that Sanjiv Bhasin had instructed Rajiv to place sell orders for 13 lots (13000 shares) at various limit prices. Accordingly, from the order log data, it is evident that Rajiv Kapoor placed sell orders for 13000 shares at the afore-mentioned limit prices as instructed by Sanjiv Bhasin. Further, it can be seen that Rajiv Kapoor placed sell orders for 4000 more shares (3000 shares at ₹947.90 and 1000 shares at ₹947.40). However, since the current market price was



lower than the sell order limit prices, the orders didn't get executed. NULL in the last column in the below table indicates that the orders didn't get executed:

Table 89

| Sell Order Date | Sell Order Time | Sell Client Name         | Sell Order no.   | Sell order original Vol | Sell order limit price | Sell LTP prior to order entry | Sell LTP prior to order mod | Trade no.* |
|-----------------|-----------------|--------------------------|------------------|-------------------------|------------------------|-------------------------------|-----------------------------|------------|
| 13/09/2022      | 12:46:19        | VENUS PORTFOLIOS PVT LTD | 2500000026806600 | 1000                    | 947                    | 946.55                        | 946.55                      | NULL       |
| 13/09/2022      | 12:58:10        | VENUS PORTFOLIOS PVT LTD | 2500000027826630 | 2000                    | 947.2                  | 946.5                         | 946.5                       | NULL       |
| 13/09/2022      | 12:58:16        | VENUS PORTFOLIOS PVT LTD | 2500000027835820 | 2000                    | 947.3                  | 946.5                         | 946.5                       | NULL       |
| 13/09/2022      | 12:58:22        | VENUS PORTFOLIOS PVT LTD | 2500000027845060 | 2000                    | 947.4                  | 946.5                         | 946.5                       | NULL       |
| 13/09/2022      | 12:58:31        | VENUS PORTFOLIOS PVT LTD | 2500000027857600 | 2000                    | 947.8                  | 946.5                         | 946.5                       | NULL       |
| 13/09/2022      | 12:58:39        | VENUS PORTFOLIOS PVT LTD | 2500000027869570 | 2000                    | 947.85                 | 946.55                        | 946.55                      | NULL       |
| 13/09/2022      | 12:58:45        | VENUS PORTFOLIOS PVT LTD | 2500000027876990 | 2000                    | 947.9                  | 946.55                        | 946.55                      | NULL       |
| 13/09/2022      | 12:58:55        | VENUS PORTFOLIOS PVT LTD | 2500000027876990 | 1000                    | 947.9                  | 946.55                        | 946.55                      | NULL       |
| 13/09/2022      | 12:59:05        | VENUS PORTFOLIOS PVT LTD | 2500000027876990 | 2000                    | 947.9                  | 946.55                        | 946.55                      | NULL       |
| 13/09/2022      | 12:59:21        | VENUS PORTFOLIOS PVT LTD | 2500000018987390 | 1000                    | 949.4                  | 948.6                         | 946.25                      | NULL       |

\*NULL - Indicates non-execution of trades

### 83.18 Transcript of 10<sup>th</sup> call at 13:06 PM on Sep 13, 2022 – Sell Side

*“Sanjiv Bhasin – Godrej ki selling sari hata de*

*Rajiv Kapoor – Sari*

*Sanjiv Bhasin – Han sari cancel kar de*

*Rajiv Kapoor – Kar di*

*Sanjiv Bhasin – Ab 49 main 3000, 49.20 main 3000 aur 49.40 main 3000 laga de, theek hain*

*Rajiv Kapoor – 49 main 3000*

*Sanjiv Bhasin – 49, 49.20, 49.40 main 3000-3000 laga de, theek hain*

*Rajiv Kapoor – theek hain”*

**83.19** From the above, it can be seen that Sanjiv Bhasin instructed Rajiv to cancel all pending sell orders. Further, he instructed Rajiv to place sell orders at ₹949 for 3000 shares, ₹949.20 for 3000 shares and at ₹949.40 for 3000 shares. From the trade data, it can be confirmed that the sell orders placed for 3000 shares each at ₹949 and ₹949.20 got executed at 13:37. However, it can be seen that the sell order placed for 3000 shares at ₹949.40 didn't get executed. The details of the executed trades are provided in the table below:



Table 90

| Trade_Date | Sell Trading Member Name         | Sell Client Name         | Sell Client PAN | Sell Symbol | Sell Instrument | Sell Order Time | Sell order Price | Trade time | Trade Quantity | Trade Price |
|------------|----------------------------------|--------------------------|-----------------|-------------|-----------------|-----------------|------------------|------------|----------------|-------------|
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | GODREJCP    | Fut             | 13:06:48        | 949              | 13:37:04   | 1000           | 949         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | GODREJCP    | Fut             | 13:06:48        | 949              | 13:37:06   | 1000           | 949         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | GODREJCP    | Fut             | 13:06:48        | 949              | 13:37:06   | 1000           | 949         |
| 2022-09-13 | RRB MASTER SECURITIES DELHI LTD. | VENUS PORTFOLIOS PVT LTD | AAACV4306R      | GODREJCP    | Fut             | 13:07:21        | 949.2            | 13:37:56   | 3000           | 949.2       |

### 83.20 Transcript of 11<sup>th</sup> call at 13:12 PM on Sep 13, 2022 – Sell Side

*“Sanjiv Bhasin – Ek bech de GodrejCP 46.25 main*

*Rajiv Kapoor – Lagaya hain par bika nahi*

*Sanjiv Bhasin – Cancel kar de yaar*

*Rajiv Kapoor – kar diya*

*Sanjiv Bhasin – Ab 46.50 par laga de 2 lot*

*Rajiv Kapoor – laga deye*

*Sanjiv Bhasin – Ek de de 46 main alag se*

*Rajiv Kapoor – Bik gaya, 46.05*

*Sanjiv Bhasin – Ek 46 main bech de ek aur*

*Rajiv Kapoor – bik gaya*

*Sanjiv Bhasin – Ab do 46.50 main laga diye na*

*Rajiv Kapoor – laga diye*

*Sanjiv Bhasin – bas theek hain, bikega to bata diyo*

*Rajiv Kapoor – theek hain”*

**83.21** From the above, it can be seen that Sanjiv Bhasin instructed Rajiv Kapoor to place sell order for 1 lot at ₹946.25. Rajiv Kapoor informed him that the order didn't execute. Then Sanjiv Bhasin instructed Rajiv Kapoor to cancel pending sell orders and place sell orders for 2 lots at ₹946.50 and 2 lots at ₹946. To which, Rajiv Kapoor informed Sanjiv Bhasin that 1 lot got sold at ₹946.05 and the other lot at ₹946. Further, Sanjiv Bhasin instructed Rajiv to place one more sell order for 1 lot at ₹946.



**83.22 Transcript of 12<sup>th</sup> call at 13:20 PM on Sep 13, 2022 – Sell Side**

*“Sanjiv Bhasin – 46.50 wale bik gaye*

*Rajiv Kapoor – 46.50 wale bik gaye*

*Sanjiv Bhasin – 4000 bik gaye na ab*

*Rajiv Kapoor – 4000 bik gaye 46.26 ki average main*

*Sanjiv Bhasin – maine jo bav liye the wo bhav bik gaye, aur 12000 tune spread kar diye*

*Rajiv Kapoor – hanji hanji*

*Sanjiv Bhasin – usme dikhleyo ek ada kam hua ya jyada hua wo kar liyo, theek hain, baki 12000 - 2 rakh lenge*

*Rajiv Kapoor – theek, lekin humne lagaye hue hain 49.20, 49.40 main, wo lage rahe na*

*Sanjiv Bhasin – han han wo to bechne hain na, 12000 laga rakhein hain na*

*Rajiv Kapoor – han laga rakhein hain*

*Sanjiv Bhasin – bas thek hain ok, niche buying hata de, kisi ki bhi buying mat rakhiyo, theek*

*Rajiv Kapoor – hata di sir, AB capital ki lagi hui thee, hata di*

*Sanjiv Bhasin – wo bhi hata de, ok”*

**83.23** From the above, it can be seen that Sanjiv Bhasin enquired from Rajiv Kapoor whether the sell order placed at ₹946.50 got executed. To which Rajiv Kapoor informed Sanjiv Bhasin that the sell order placed at ₹946.50 got executed and the average price of 4000 shares sold later is ₹946.26. Sanjiv Bhasin then instructed Rajiv Kapoor to place sell orders for remaining 12000 shares in the price range of CMP +/- ₹1 to 1.50 per share and further to remove all the pending buy orders of other scrips too.

**83.24** Investigation also revealed that Leo Portfolios Pvt Ltd, an entity which is related/connected to Ashish Kapur, RRB Master Securities Delhi Ltd and Lalit Bhasin, was aware of the modus operandi of the trades of





Sanjiv Bhasin. Upon perusal of the trade log obtained from NSE, it is observed that Leo Portfolios had also traded in the scrip GODREJCP on September 13, 2022 and made profit.

**83.25** A brief analysis of all the entities trades based on such advance information of recommendations given by Sanjiv Bhasin is given below:

Table 91

| Analysis of trades carried out by the entities in the scrip “GODREJCP”              |             |                 |               |                 |                 |                      |                   |               |                  |                 |                      |                            |                                       |          |
|-------------------------------------------------------------------------------------|-------------|-----------------|---------------|-----------------|-----------------|----------------------|-------------------|---------------|------------------|-----------------|----------------------|----------------------------|---------------------------------------|----------|
| Date and Recommendation time – Sept 13, 2022, 13:35<br>(Contract- GODREJCP22SEPFUT) |             |                 |               |                 |                 |                      |                   |               |                  |                 |                      |                            |                                       |          |
| Client Name                                                                         | PAN         | Buy (First Leg) |               |                 |                 |                      | Sell (Second Leg) |               |                  |                 |                      | Gross Trd. Vol to Mkt Vol. | Scrip Trd Val. to all scrips trd val. | Profit ₹ |
|                                                                                     |             | Order Time      | Trade Time    | Buy Price range | Traded Quantity | Total Value Traded ₹ | Order Time        | Trade Time    | Sell Price range | Traded Quantity | Total Value Traded ₹ |                            |                                       |          |
| Gemini Portfolios Private Limited                                                   | AAACG 4847Q | 12:01 – 12:02   | 12:15         | 944.65          | 4000            | 3778400              | 14:14             | 14:14         | 949.20           | 4000            | 3796800              | 0.24%                      | 33%                                   | 18400    |
| Venus Portfolios Pvt Ltd                                                            | AAACV 4306R | 10:36 – 13:54   | 10:36 – 14:14 | 943.65 – 949.20 | 16000           | 15158300             | 13:06 – 13:23     | 13:12 – 13:37 | 946 – 949.20     | 16000           | 15165850             | 0.96%                      | 18%                                   | 7550     |
| Leo Portfolios Private Limited                                                      | AAACL 2384F | 10:53 – 12:15   | 10:53 – 12:21 | 944.05 – 947.70 | 2000            | 1891750              | 13:24             | 13:24 – 13:25 | 946.50           | 2000            | 1893000              | 0.12%                      | 27%                                   | 1250     |

**84.** It is seen that out of 16000 shares traded that day, Venus bought 12000 shares (6000 shares (50%) at 10:36 AM, 4000 shares (33.33%) at 11:02 AM and remaining 2000 shares (16.67%) at 12:21 PM, before the time of telecast of recommendation on Zee Business news channel and sold 12000 shares between 13:35 PM – 13:37 PM. Further, out of the total 16000 shares traded on that day, Venus sold 12000 shares after the recommendation and made a profit of ₹19300 and sold 4000 shares prior to the recommendation and made a loss of ₹11750. However, on an aggregate basis, Venus made net profit of ₹7,550.

**85.** From the above table, it is seen that Gemini bought 4000 shares of scrip GODREJCP in the Future Segment on September 13, 2022 at 12:15 PM, before





the time of telecast of recommendation done by *Noticee No. 1* on Zee Business news channel. After making the recommendation to buy the scrip GODREJCP was given on the show, the *Noticee No. 1* through Gemini, squared off his entire position taken in the scrip GODREJCP at 14:14 PM. Accordingly, Gemini made a profit of ₹18,400.

- 86.** As detailed in the illustration LTTS Future dated Jan 11, 2022 and SAIL Futures dated August 26, 2022 in the preceding paras, Leo followed the similar strategy in the instant scrip of GODREJCP Futures. Similar to trades carried out by Venus & Gemini, Leo also followed the same trading methodology and earned a profit of ₹1,250 in the instant scrip of GODREJCP in the future segment. On the basis of the information received from the *Noticee No. 1*, Rajiv Kapoor also mirrored trades of Sanjiv Bhasin in the trading account of Leo Portfolios Pvt Ltd.
- 87.** It can be seen that Leo followed the same trading pattern of Gemini & Venus by creating position in the same scrip prior to recommendation. Subsequently, after the making of recommendation by *Noticee No. 1*, all entities except Leo started squaring off their positions and earned profit. It is to be noted that since Rajiv Kapoor had placed the limit order for Leo at a price less than the sell order limit price of Venus, the sell order of Leo had got executed before the recommendation at a lesser selling price than that of Venus.
- 88.** From the order placement analysis, it is inferred that entities executed their trades aiming to capitalize on the price-volume movement in the scrip/contract GODREJCP as a result of the recommendation made on the show by *Noticee No. 1*.
- 89.** Accordingly, a total profit of ₹27,200 was made by *Noticees* namely Venus, Gemini and Leo in the scrip of GODREJCP.

#### **G. OTHER TRADES INVOLVING SIMILAR MODUS OPERANDI**

- 90.** On sample basis, similar analysis was carried out for more than 100 instances during the Investigation Period, where corroborative evidence similar to what is



detailed in above five illustrations are available, and it is found that the *Noticee No. 1* along with other *Noticees*, employed similar strategy in these other instances too and made huge profits. In addition, it was seen that there are thousands of instances where the buy recommendations by the *Noticee No. 1* on Media Channels/Telegram were preceded by buy trade in the accounts of profit makers/beneficiaries and succeeded by sell trades in such accounts.

91. For a detailed analysis of the matter involving huge number of trades done by *Noticees* during the IP, trades of the *Noticee No. 1* in the trading accounts of profit makers/beneficiaries were segregated into matching and non-matching trades. The term matching trades refer to trades which were preceded by similar trade in the accounts of profit makers/beneficiaries before the public recommendations by the *Noticee No. 1* and succeeded by the reverse trade in accounts of same profit makers/beneficiaries. Matching trades of *Noticees* were compared vis-a-vis total trades both in Intraday and positional trades in scrip days. The details are tabulated in the table below:

Table 92

| Trades by <i>Noticees</i> (in scrip days)    |              |                 |              |                 |               |                 |              |                 |
|----------------------------------------------|--------------|-----------------|--------------|-----------------|---------------|-----------------|--------------|-----------------|
| Entity Name                                  | Cash         |                 |              |                 | Stock Futures |                 |              |                 |
|                                              | Intraday     |                 | Positional   |                 | Intraday      |                 | Positional   |                 |
|                                              | Total Trades | Matching Trades | Total Trades | Matching Trades | Total Trades  | Matching Trades | Total Trades | Matching Trades |
| Gemini Portfolios Private Limited            | 18           | 2               | 248          | 4               | 488           | 288             | 1324         | 194             |
| HB Stockholdings Limited                     | 128          | 17              | 2024         | 88              | 784           | 363             | 2942         | 354             |
| Venus Portfolios Pvt. Ltd.                   | 14           | 9               | 111          | 4               | 3940          | 2292            | 3019         | 1123            |
| Leo Portfolios Private Limited               | 159          | 68              | 1310         | 40              | 2507          | 1634            | 549          | 64              |
| Ashish Kapur                                 | 23           | 2               | 1177         | 52              | 1751          | 1174            | 146          | 30              |
| Babita Gupta                                 | 25           | 7               | 554          | 29              | 961           | 579             | 59           | 20              |
| Jagat Singh                                  | 387          | 227             | 15           | 0               | 2410          | 1630            | 223          | 90              |
| Rajiv Kapoor                                 | 73           | 20              | 64           | 2               | 1192          | 643             | 456          | 102             |
| Total Scrip Days                             | 827          | 352             | 5503         | 219             | 14033         | 8603            | 8718         | 1977            |
| % of Matching scrip days to Total scrip days | 42.56%       |                 | 3.98%        |                 | 61.31%        |                 | 22.68%       |                 |



**92.** From analysis of the above table, following is observed w.r.t. the matching trades of *Noticees*:

**92.1** Out of total scrip days of 827 traded in cash segment on intraday basis, 352 scrip days (42.56%) were matching trades.

**92.2** Out of total scrip days of 5503 traded in cash segment on positional trades, 219 scrip days (3.98%) were matching trades.

**92.3** Out of total scrip days of 14033 traded in derivatives segment (stock futures) on intraday basis, 8603 scrip days (61.31%) were matching trades.

**92.4** Out of total scrip days of 8718 traded in derivatives segment (stock futures) on positional trades, 1977 scrip days (22.68%) were matching trades.

**93.** The aforesaid matching trades have been further compared vis-à-vis total trades done by *Noticees* during the IP, based on Gross Traded Value ("**GTV**") (*i.e.* sum of buy and sell value on scrip days). The details of the same are tabulated in the table below:

Table 93

| Gross Trade Value* (GTV) of matching trades (In ₹Crores) |              |                 |              |                 |               |                 |              |                 |
|----------------------------------------------------------|--------------|-----------------|--------------|-----------------|---------------|-----------------|--------------|-----------------|
| Entity Name                                              | Cash         |                 |              |                 | Stock Futures |                 |              |                 |
|                                                          | Intraday     |                 | Positional   |                 | Intraday      |                 | Positional   |                 |
|                                                          | Total trades | Matching trades | Total trades | Matching trades | Total trades  | Matching trades | Total trades | Matching trades |
| Gemini Portfolios Private Limited                        | 2.52         | 0.44            | 33.16        | 0.52            | 170.78        | 101.79          | 398.89       | 53.20           |
| HB Stockholdings Limited                                 | 29.46        | 8.66            | 421.73       | 27.81           | 1,030.10      | 511.33          | 2,516.83     | 306.84          |
| Venus Portfolios Pvt. Ltd                                | 2.87         | 2.64            | 17.99        | 0.68            | 4,532.63      | 2,750.60        | 3,125.72     | 1,212.18        |
| Leo Portfolios Private Limited                           | 16.08        | 8.01            | 47.16        | 1.45            | 712.90        | 470.84          | 59.43        | 8.85            |
| Babita Gupta                                             | 1.70         | 0.97            | 2.07         | 0.21            | 497.95        | 323.74          | 8.36         | 4.10            |
| Ashish Kapur                                             | 2.63         | 0.14            | 49.61        | 1.87            | 466.78        | 314.12          | 19.25        | 4.23            |
| Rajiv Kapoor                                             | 5.89         | 1.39            | 1.84         | 0.02            | 219.32        | 114.46          | 65.66        | 15.93           |
| Jagat Singh                                              | 49.52        | 29.09           | 0.52         | -               | 953.70        | 669.86          | 69.20        | 26.43           |



| Gross Trade Value* (GTV) of matching trades (In ₹Crores)         |              |                 |              |                 |               |                 |              |                 |
|------------------------------------------------------------------|--------------|-----------------|--------------|-----------------|---------------|-----------------|--------------|-----------------|
| Entity Name                                                      | Cash         |                 |              |                 | Stock Futures |                 |              |                 |
|                                                                  | Intraday     |                 | Positional   |                 | Intraday      |                 | Positional   |                 |
|                                                                  | Total trades | Matching trades | Total trades | Matching trades | Total trades  | Matching trades | Total trades | Matching trades |
| Total GTV                                                        | 110.67       | 51.34           | 574.07       | 32.57           | 8,584.15      | 5,256.73        | 6,263.33     | 1,631.77        |
| % of GTV of matching trades to Total GTV                         | 46.39%       |                 | 5.67%        |                 | 61.24%        |                 | 26.05%       |                 |
| *Gross traded value (GTV) includes both buy value and sell value |              |                 |              |                 |               |                 |              |                 |

94. On a perusal of the above table, the following can be seen w.r.t. the value of matching trades of *Noticees*:

94.1 Out of total GTV of ₹110.67 Crores traded in cash segment on intraday basis, ₹51.34 Crores (46.39%) GTV were matching trades.

94.2 Out of total GTV of ₹574.07 Crores traded in cash segment on positional trades, ₹32.57 Crores GTV (5.67%) were matching trades.

94.3 Out of total GTV of ₹8584.15 Crores traded in derivatives segment (stock futures) on intraday basis, ₹5256.73 Crores GTV (61.24%) were matching trades.

95. Out of total GTV of ₹6263.33 Crores traded in derivatives segment (stock futures) on positional trades, ₹1631.77 Crores GTV (26.05%) were matching trades. The GTV in the stock futures segment refers to the total exposures of derivatives contract traded by *Noticees*.

96. Considering the trades as illustrated above and more than 100 instances examined with corroborative call/WhatsApp evidences, it can be reasonably inferred based on preponderance of probability that in all other matching trades of *Noticees* also, similar *modus operandi* was employed and huge profits were made, through an alleged fraudulent scheme.

## H. ROLE OF *NOTICEES*

97. The detailed examination of the trading pattern of *Noticees*, sharing of the information by *Noticee No. 1* with dealers of *Noticee No. 4* just before the



recommendation of the same scrip and trades carried out by *Noticees* in different accounts, *prima facie* shows that trades were being placed at the behest of *Noticee No. 1* by different dealers of *Noticee No. 4*, as per the authorisations given by *Noticee Nos. 2 and 3*. The buy trades were placed in the scrip just before recommendations of the scrip to the public by the *Noticee No. 1* on various Media Channels/Telegram accounts of IIFL, and then the buy positions taken earlier were immediately squared-off, as per the instructions of the *Noticee No. 1* to different dealers of *Noticee No. 4*, as revealed from the transcripts, generating profit. During this time, some of *Noticees* also used the information to make profit in their own accounts.

### **Noticee No. 1**

98. The *Noticee No. 1* was a Consultant/Director of IIFL during the investigation period. He was a guest expert appearing on various News Channels. He, *prima facie* was the mastermind of the alleged fraudulent scheme devised to generate profit. He used to make recommendations on media channels and social media platforms including telegram and internal platforms of IIFL. Before appearing on Media Channels, he would first create positions (majorly buy) in Gemini, Venus and HB Stock Holdings through *Noticee Nos. 5 and 6*, dealers of RRB Master.
99. Subsequently, he used to recommend majorly buy recommendations in certain scrips on TV Channels, which included those scrips in which he had already taken huge buy positions. Thereafter, contrary to his own buy recommendations given to the viewers *en masse*, he would give instructions to *Noticee Nos. 5 and 6* to carry out opposite trades (sell). In his statement recorded under oath, the *Noticee No. 1* admitted that he was giving daily stock recommendation either through IIFL daily Newsletter or by appearing in various business news channels on behalf of IIFL. Considering the huge viewership of the Media Channels and the stature of the *Noticee No. 1* in the securities market, the recommendations of Sanjiv Bhasin created significant price/volume impact in the recommended scrips enabling *Noticees* to make profit by placing sell order contrary to the recommendations.



### **Noticee Nos. 2, 3 and 4**

- 100.** The *Noticee No. 2* acted as enabler and was also beneficiary of the alleged fraudulent scheme orchestrated by his cousin brother/ guest expert Sanjiv Bhasin/*Noticee No. 1*. The *Noticee No. 2* was an Advisor of Venus and Gemini and Executive Director of HB. He authorised the *Noticee No. 1* to place trades in trading accounts of Venus, Gemini and HB. Further, the *Noticee No. 2*, being Director of *Noticee No. 4* allowed dealers of *Noticee No. 4* to take instructions from *Noticee No. 1* to trade in accounts of these *Noticees*. By virtue of his direct or indirect control over these entities viz. Venus, Gemini and HB, he allowed the *Noticee No. 1* to use trading accounts of these entities in which he had major beneficial interest. In this way, the *Noticee No. 2* facilitated/aided the guest expert Sanjiv Bhasin and also at times, assisted in the placement of the alleged fraudulent trades in trading accounts of these *Noticees*.
- 101.** Investigation has revealed that Lalit Bhasin is also responsible for trades carried out by dealers of *Noticee No. 4* at the behest of *Noticee No. 1*, in the trading accounts of Venus, Gemini and HB through Sanjiv Bhasin. As shown in Part F of this Order, during some instances Lalit Bhasin was also in touch with the *Noticee No. 1* during placement of trades as per the instructions of the *Noticee No. 1*. As shown in [Table 52](#) above, *Noticee No. 1* asked *Noticee No. 2* to get his 1.22 Cr cash in his daily sheet indicating that this was a regular occurrence, and *Noticee No. 2* was aware of the same.
- 102.** The *Noticee No. 3* in the capacity of MD of RRB Master gave unconditional access to its dealers/clients for placement of trades by Sanjiv Bhasin on a regular basis and played the role of key enabler for executing the alleged fraudulent scheme by Sanjiv Bhasin. This was also accepted by him during the statement recorded under oath. The *Noticee No. 3* through *Noticee No. 4*, provided the required setup/infrastructure to *Noticee No. 1* to run his alleged fraudulent scheme by placing orders in accounts of certain Profit Makers. *Noticee Nos. 3* also misused the privy information, obtained directly/indirectly from Sanjiv Bhasin by virtue of Sanjiv Bhasin placing orders through the



dealers of RRB Master and made profit in their own/associated person's accounts.

- 103.** It may be noted that w.r.t. the orders being placed in the accounts of the Profit Makers by the dealers of *Noticee No. 4*, as per the instructions of the *Noticee No. 1*, *Noticee No. 1* submitted the following during the statement recorded under oath:

*“Q.7 Did you meet authorized persons/ shareholders / Directors of/in Venus Portfolios Limited, Gemini Portfolios Limited, HB Stock Holdings Limited and RRB Master Securities Delhi Limited?”*

*A.7. I have met the authorized person; the details are below.*

- 1. Venus Portfolios Limited- Mr. Raj Kumar Sharma and Mr. M.S. Sharma*
- 2. Gemini Portfolios Limited- I don't recollect now*
- 3. HB Stock Holdings Limited- Lalit Bhasin*
- 4. RRB Master Securities Delhi Ltd- Ashish Kapur*

*They were aware of me carrying out trades in the accounts of Venus and Gemini. Particularly, Mr. Ashish Kapur was also aware of carrying out trades by me in the accounts of Venus, Gemini and HB Stock.”*

- 104.** From perusal of the statement of the *Noticee No. 1*, it can be inferred that *Noticee Nos. 2 and 3* were aware of the trades being carried out in the accounts of Venus, Gemini and HB Stock. This strengthens the connection amongst the entities and their awareness of orders being placed in the trading accounts, as per the instructions of *Noticee No.1*.

- 105.** W.r.t. the authority of the *Noticee No. 1* for the trades being placed in trading accounts of the certain Profit Makers, the *Noticee No. 3* submitted the following during his statement recorded under oath:

*“Q. In what authority, Sanjeev Bhasin placed orders in the accounts of Venus and Gemini during the period of Jan 2020- June 2024? Who*





*authorized your dealer to place orders in the accounts of Venus and Gemini on receiving instructions from Sanjiv Bhasin?*

- A. *Sanjeev Bhasin is a family member and the authorized persons/ advisor (Lalit Bhasin) of these companies were aware of these trades. It was my belief that some understanding would be there between the companies and Sanjeev Bhasin regarding trading in these accounts.*

*This trading started more than 4 years back and I don't remember who initially authorized this. However, on an ongoing basis I was authorizing the dealers to place orders in the accounts of Venus and Gemini on instructions of Sanjiv Bhasin.*" ("emphasis supplied")

**106.** On a perusal of the statement of the *Noticee No. 3*, it can be reasonably ascertained that the *Noticee No. 3* authorised dealers of the *Noticee No. 4* to place orders in accounts of Profit Makers viz. Venus and Gemini on instructions of Sanjiv Bhasin. He has further acknowledged in his statement that the *Noticee No. 1* was a family member and that *Noticee Nos. 2 and 3* were aware about the trades being placed in the accounts of Venus and Gemini.

**107.** It is seen that since the *Noticee No. 2* was on the board of *Noticee No. 4*, *Noticee No. 3* did not make any further enquiries w.r.t. the authorizations given to *Noticee No. 1* to instruct the dealers to place trades in the accounts of Venus and Gemini. *Noticee Nos. 2 and 3* were aware of the alleged fraudulent trades being placed in the trading accounts of certain Profit Makers at the behest of *Noticee No. 1*, and *Noticee Nos. 2 and 3* have acted as Enablers in the alleged scheme, aiding in generating profit based on placement of such contrary trades.

**Noticee Nos. 5, 6 and 7**

**108.** *Noticee Nos. 5 and 6*, dealers of RRB Master, and *Noticee No. 7*, who was authorized signatory of *Noticee No. 4* misused the privy information, obtained



directly/indirectly from *Noticee No. 1* by virtue of him giving instructions to *Noticee Nos. 5, 6 and 7* while placing orders through them. Accordingly, by emulating the same trading strategy as that of *Noticee No. 1*, (i) *Noticee Nos. 5 and 6* placed orders in their own trading accounts; (ii) *Noticee No. 7* placed orders in the trading account of his wife Babita Gupta (*Noticee No. 12*) and made profits.

- 109.** With respect to the BTST trades carried out by the *Noticee No. 1*, the *Noticee No. 5* in his statement recorded under oath on June 13, 2024 stated that Lalit Bhasin had instructed him to place orders as per instructions of the *Noticee No. 1* and he merely followed instructions of Sanjiv Bhasin. He further stated that when he used to handle the account of Venus and place orders, following instructions of Sanjiv Bhasin, there would be approximately 30-40 calls from/to Sanjiv Bhasin on an average per day. The following statements of the *Noticee No. 5* show that he was aware about the trading strategy of the *Noticee No. 1* and used to follow his instructions. It can also be seen that the *Noticee No. 5* has acknowledged that sometimes he placed orders in the same scrips for which he received instructions from the *Noticee No. 1*.

*“Q. 14 Do you know that Sanjiv Bhasin does BTST (Buy Today Sell Tomorrow) trades? (i.e.) he appears in news channels prior to pre market session and recommends the same scrips that he owns in the portfolio of VP and which he subsequently asks you to sell post recommendation.*

*A. 14 Yes, I assume he is doing the same since the scrip he recommends spurts in volume post recommendation. As I am a dealer in RRB, my job is to punch the orders given.*

*Q. 19 Have you ever bought/sold the same scrips that Sanjiv Bhasin has instructed you to buy/sell in the trading account of VP during the period 2020 to later half of 2022 (i.e.) when you handled the portfolio of VP?*



A. 19 Yes, sometimes I placed orders in my personal trading account with SMC Global for the same scrips in which Sanjiv Bhasin has asked me to buy for Venus Portfolio Pvt. Ltd.”

**Noticee Nos. 8, 9, 10, 11 and 12**

110. Noticee Nos. 8, 9, 10, 11 and 12 were profit makers of the alleged fraudulent scheme orchestrated by the Noticee No. 1. Noticee Nos. 8 & 9 appointed their major controlling shareholder Noticee No. 2 as Advisor, who in turn authorized the Noticee No. 1 to trade in their trading accounts. The Noticee No. 2 also allowed dealers of RRB Master to execute instructions of Sanjiv Bhasin and place orders in the accounts of Venus, Gemini and HB.
111. Babita Gupta's husband Noticee No. 7 misused the privy information, obtained directly/indirectly from Sanjiv Bhasin by virtue of him placing orders through the dealers of Noticee No. 4, RRB Master. The Noticee No. 7 placed orders in account of the Noticee No. 12 and earned profit. The Noticee No. 3, who was authorised signatory for placing orders in the account of the Noticee No. 11 also misused the privy information, obtained directly/indirectly from Sanjiv Bhasin and allowed Noticee Nos. 5 and 6, to place orders in the trading account of Noticee No. 11 to earn profit.

**I. PROFIT SHARING AMONGST NOTICEES**

112. All trades carried out by Noticees were analysed vis-a-vis the stock recommendations made by Sanjiv Bhasin in the Media channels/Telegram during the investigation period ranging from January 01, 2020 to June 12, 2024. Noticees have allegedly earned huge ill-gotten gains by manipulating the price/volume momentum driven by the recommendations of Noticee No. 1 on Media Channels. The alleged ill-gotten gains earned by Noticees are tabulated in the table below:



Table 94

| Sl. no. | Name                              | Positional Trades  |                  | Intraday Trades  |                    | Grand Total (in ₹)  |
|---------|-----------------------------------|--------------------|------------------|------------------|--------------------|---------------------|
|         |                                   | Futures (in ₹)     | Cash (in ₹)      | Futures (in ₹)   | Cash (in ₹)        |                     |
| 1       | Gemini Portfolios Private Limited | -26,36,495.83      | 38,043.45        | 78,699.90        | 52,89,788.45       | 27,70,036           |
| 2       | Venus Portfolios Private Limited  | 51,69,756.93       | 5,31,386.43      | 2,24,911.50      | 5,72,70,843.60     | 6,31,96,898         |
| 3       | HB Stockholdings Limited          | 80,58,897.99       | 56,31,985.01     | 17,32,352.70     | 88,14,561.90       | 2,42,37,798         |
| 4       | Leo Portfolios Private Limited    | 44,668.75          | 1,23,895.38      | 4,56,368.60      | 59,40,600.25       | 65,65,533           |
| 5       | Ashish Kapur                      | 8,870.83           | 1,64,612.97      | 2,504.30         | 30,65,808.60       | 32,41,797           |
| 6       | Babita Gupta                      | -56,057.96         | - 6,385.55       | 74,042.75        | 32,08,291.45       | 32,19,891           |
| 7       | Jagat Singh                       | - 1,30,430.70      | -                | 5,04,704.65      | 85,79,095.55       | 89,53,370           |
| 8       | Rajiv Kapoor                      | - 2,59,948.00      | 1,125.00         | 95,476.00        | 16,97,194.70       | 15,33,848           |
|         | <b>Grand Total (in ₹)</b>         | <b>1,01,99,262</b> | <b>64,84,663</b> | <b>31,69,060</b> | <b>9,38,66,185</b> | <b>11,37,19,170</b> |

**113.** Out of the total trades carried out by *Noticees*, profit has been calculated only for matching trades discussed earlier at Part G of this order. On the basis of examination of matching trades vis-à-vis the recommendations made by the *Noticee No. 1*, the alleged ill-gotten gains have been calculated for cash segment and futures segment for positional trades and intraday trades. Only trades carried out on the NSE platform were considered for examination including calculation of alleged ill-gotten gains. It is seen from the above table that an amount of ₹11,37,19,170/- was gained from these matching trades collectively carried out by *Noticees* during the Investigation Period.

**114.** It has been revealed during the investigation that the profit earned through such matching trades as discussed in the preceding paras, was being shared between Sanjiv Bhasin and Lalit Bhasin. Evidence collected during the investigation substantiates the findings w.r.t sharing of profits amongst them.

#### **114.1 Sharing of Daily Trade Sheet in Future Segment:**

Investigation revealed that Sanjiv Bhasin kept account of details of daily trades carried out in the accounts of Venus, Gemini and HB in Futures



Segment. Such trade details included the names of the scrips, trade prices and the amount of profit/loss earned on such trades. In this regard, certain images as extracted from the WhatsApp chats between Sanjiv Bhasin and Lalit Bhasin are produced below:

Table 95

Images of Sharing of Daily Trade Sheet in Future Segment

**Date:** July 28, 2023

**Content:**

Sanjiv Bhasin shared an image having "Title – MTOM" – 28.07.2023"

*\*MTOM is an acronym which stands for Mark to Market. Trades executed in the derivatives segment are marked to market on a daily basis.*

**Inference:**

Sanjiv Bhasin shared with Lalit Bhasin an image of MTOM dated July 28, 2023 having details of positions created in Future contracts VOLTAS, ICICIBANK and SBILIFE for expiry month of August 2023.

It is further observed that the sheet contains the scrip details, dates of trades and the MTOM details, which is loss in the instant case.

It is noted that on July 27, 2023, Sanjiv Bhasin bought 15000 quantities of SBILIFE AUG 2023 scrip in the future segment through HB, just prior to recommendations on IIFL Telegram Channel and sold 6000 quantities after the said recommendation. The remaining quantities of 9000 were unsold on July 28, 2023, which has been shown as outstanding with a Mark to Market value as on July 28, 2023.

| Z - MTOM           |          |           |      |         |          |            |           |  |  |  |
|--------------------|----------|-----------|------|---------|----------|------------|-----------|--|--|--|
|                    |          |           |      |         |          | 28.07.2023 |           |  |  |  |
|                    |          |           |      |         | TRADE    |            |           |  |  |  |
| SCRIPT             | D.O.PUR. | EXP.DT.   | QTY  | PRICE   | Mkt.Rate | MTOM       | Total     |  |  |  |
| OUTSTANDING - MTOM |          |           |      |         |          |            |           |  |  |  |
| 31-Aug-23          |          |           |      |         |          |            |           |  |  |  |
| VOLTAS31AUGFUT     | 25/Jul   | 31-Aug-23 | 6000 | 769.64  | 763.70   | (35640)    |           |  |  |  |
| ICICIBANK31AUGFUT  | 27/Jul   | 31-Aug-23 | 7000 | 996.97  | 763.70   | (1632855)  |           |  |  |  |
| SBILIFE31AUGFUT    | 27/Jul   | 31-Aug-23 | 9000 | 1310.93 | 992.35   | (2867220)  |           |  |  |  |
|                    |          |           |      |         |          |            | (4535715) |  |  |  |
| TOTAL - MTOM       |          |           |      |         | TOTAL    | (4535715)  | (4535715) |  |  |  |
| TOTAL EXPOSURE RS. |          |           |      |         |          |            |           |  |  |  |
| 23394965.00        |          |           |      |         |          |            |           |  |  |  |



| <div><div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)<br/>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Mtm is wrong sbi life rate is 1305 not 993<br/>Kindly send new mtm</div></div><div><table><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr><tr><td>[REDACTED]@s.whatsapp.net<br/>Lalit bhasin 2</td><td>7/28/2023 5:42:34 PM(UTC+5:30)</td><td>7/28/2023 5:48:28 PM(UTC+5:30)</td><td></td></tr></table><div>Status: Read<br/>Platform: Mobile</div><div>7/28/2023 5:42:32 PM(UTC+5:30)</div></div></div> | Participant                                                                                                                                                                                                                                                                       | Delivered                      | Read   | Played | [REDACTED]@s.whatsapp.net<br>Lalit bhasin 2 | 7/28/2023 5:42:34 PM(UTC+5:30) | 7/28/2023 5:48:28 PM(UTC+5:30) |  | <div><div><div>Date: <u>July 28, 2023</u></div><div><div>Content:</div><div>Sanjiv Bhasin texted Lalit Bhasin: "Mtm is wrong sbi life rate is 1305 not 993. Kindly send new mtm"</div></div><div><div>Inference:</div><div>Subsequent to forwarding of MOTM sheet dated July 28, 2023, Sanjiv Bhasin pointed out a discrepancy in Closing Price of scrip SBILIFE in FUTURE segment, which need to be corrected.</div></div></div></div> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|--------|--------|---------------------------------------------|--------------------------------|--------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Delivered                                                                                                                                                                                                                                                                         | Read                           | Played |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| [REDACTED]@s.whatsapp.net<br>Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7/28/2023 5:42:34 PM(UTC+5:30)                                                                                                                                                                                                                                                    | 7/28/2023 5:48:28 PM(UTC+5:30) |        |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <div><div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)<br/>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Also ICICI close is 993 and not 773</div></div><div><table><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr><tr><td>[REDACTED]@s.whatsapp.net<br/>Lalit bhasin 2</td><td>7/28/2023 5:43:51 PM(UTC+5:30)</td><td>7/28/2023 5:48:28 PM(UTC+5:30)</td><td></td></tr></table><div>Status: Read<br/>Platform: Mobile</div><div>7/28/2023 5:43:48 PM(UTC+5:30)</div></div></div>                                | Participant                                                                                                                                                                                                                                                                       | Delivered                      | Read   | Played | [REDACTED]@s.whatsapp.net<br>Lalit bhasin 2 | 7/28/2023 5:43:51 PM(UTC+5:30) | 7/28/2023 5:48:28 PM(UTC+5:30) |  | <div><div><div>Date: <u>July 28, 2023</u></div><div><div>Content:</div><div>Sanjiv Bhasin texted Lalit Bhasin: "Also ICICI Close is 993 and not 773"</div></div><div><div>Inference:</div><div>Additionally, Sanjiv Bhasin also pointed out another discrepancy in the scrip of ICICIBANK AUG 2023 in the future segment.</div></div></div></div>                                                                                       |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Delivered                                                                                                                                                                                                                                                                         | Read                           | Played |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| [REDACTED]@s.whatsapp.net<br>Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7/28/2023 5:43:51 PM(UTC+5:30)                                                                                                                                                                                                                                                    | 7/28/2023 5:48:28 PM(UTC+5:30) |        |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <div><div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)<br/>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Got the new one</div></div><div><table><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr><tr><td>[REDACTED]@s.whatsapp.net<br/>Lalit bhasin 2</td><td>7/28/2023 6:30:41 PM(UTC+5:30)</td><td>7/28/2023 6:30:44 PM(UTC+5:30)</td><td></td></tr></table><div>Status: Read<br/>Platform: Mobile</div><div>7/28/2023 6:30:39 PM(UTC+5:30)</div></div></div>                                                    | Participant                                                                                                                                                                                                                                                                       | Delivered                      | Read   | Played | [REDACTED]@s.whatsapp.net<br>Lalit bhasin 2 | 7/28/2023 6:30:41 PM(UTC+5:30) | 7/28/2023 6:30:44 PM(UTC+5:30) |  | <div><div><div>Date: <u>July 28, 2023</u></div><div><div>Content:</div><div>Sanjiv Bhasin texted Lalit Bhasin: "Got the new one".</div></div><div><div>Inference:</div><div>Upon sharing the MTOM sheet dated July 28, 2023 and highlighting the discrepancies to Lalit Bhasin, Sanjiv Bhasin informed Lalit Bhasin that he got the revised MTOM sheet.</div></div></div></div>                                                         |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Delivered                                                                                                                                                                                                                                                                         | Read                           | Played |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| [REDACTED]@s.whatsapp.net<br>Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7/28/2023 6:30:41 PM(UTC+5:30)                                                                                                                                                                                                                                                    | 7/28/2023 6:30:44 PM(UTC+5:30) |        |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <div><div><div>From: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Ok great</div><div>Platform: Mobile</div><div>7/28/2023 6:30:49 PM(UTC+5:30)</div></div></div>                                                                                                                                                                                                                                                                                                                                                                                              | <div><div><div>Date: <u>July 28, 2023</u></div><div><div>Content:</div><div>Lalit Bhasin texted Sanjiv Bhasin: "Ok great".</div></div><div><div>Inference:</div><div>Lalit Bhasin noted the Sanjiv Bhasin's confirmation of receiving revised MTOM sheet.</div></div></div></div> |                                |        |        |                                             |                                |                                |  |                                                                                                                                                                                                                                                                                                                                                                                                                                         |




**114.2** From the above WhatsApp Chats between Sanjiv Bhasin and Lalit Bhasin, it is inferred that there was maintenance of records of trades carried out/open position in FUTURES Contracts on a particular day along with Mark to Market value of such trades.

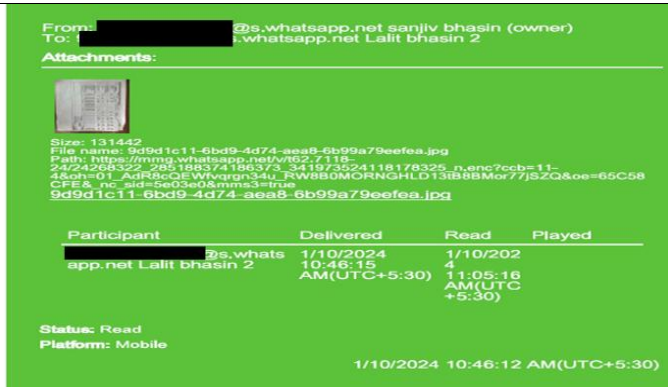
**114.3 Sharing of Periodic Trade Sheet in Cash Segment:**

Investigation revealed that Sanjiv Bhasin kept account of details of trades carried out in the accounts of Venus, Gemini and HB in cash segment on periodic basis. Such trade details included the name of the scrips, trade prices and the amount of profit/loss earned on such trades. In this regard, certain images as extracted from the WhatsApp chats between Sanjiv Bhasin and Lalit Bhasin are produced below:

Table 96

| <u>Sharing of / Discussion on Periodic Trade Sheet in Cash Segment</u>             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p><b><u>Date: Jan 10, 2024</u></b></p> <p><b><u>Content:</u></b><br/>Sanjiv Bhasin texted Lalit Bhasin: “***** has not included Vodafone buy/sell in cash sheet”</p> <p><b><u>Inference:</u></b><br/>As discussed in preceding paras, there was maintenance of records of trade executed in FUTURE Segments.</p> <p>Similarly, in this instance, Sanjiv Bhasin had informed Lalit Bhasin that a person named ***** has not included trades of Vodafone in the Cash Sheet. This clearly indicates that there was maintenance of records of trades carried out in Cash Segment.</p> <p><i>*It may be noted that Investigation revealed that Rawat is a Computer Operator of RRB Master, works from office located at Connaught Place, Delhi.</i></p> |





**Date: Jan 10, 2024**

**Content:**

Sanjiv Bhasin shared an image having Title "Day Book – From April 03, 2023 to Jan 09, 2024 sheet with Lalit Bhasin."

**Inference:**

After pointing out the discrepancy of not including Vodafone in the previous chat, Sanjiv Bhasin shared the trade sheet details to Lalit Bhasin. This trade sheet has details of the trades carried out by Sanjiv Bhasin in Cash Segment during the period April 03, 2023 to Jan 09, 2024 along with the amount of profit earned which is ₹2,67,30,449.00 during the period.

| DAY BOOK - FROM 03/04/2023 TO 09/01/2024 |                       |         |               |           |            |              |            |                                       |              |
|------------------------------------------|-----------------------|---------|---------------|-----------|------------|--------------|------------|---------------------------------------|--------------|
| SL. NO.                                  | NAME OF SCRIP         | QTY.    | PURCHASE RATE | AMOUNT    | SALES QTY. | SALES RATE   | AMOUNT     | BALANCE QTY.                          | BALANCE RATE |
| CASH SEGMENT                             |                       |         |               |           |            |              |            |                                       |              |
| 1                                        | PAASCOGATES           | 21089   | 7.20          | 151840.80 |            |              |            | 21089                                 | 7.20         |
| 2                                        | SW SOLAR              | 30000   | 299.55        | 8986500   |            |              |            | 30000                                 | 299.55       |
| 3                                        | SW SOLAR NEW          | 20000   | 299.55        | 5991000   |            |              |            | 20000                                 | 299.55       |
| TOTAL - OUTSTANDING                      |                       |         |               | 151840.80 |            |              |            |                                       |              |
| CASH SEGMENT                             |                       |         |               |           |            |              |            |                                       |              |
| 1                                        | ICICI BANK            | 75000   | 135.19        | 10139250  |            |              |            | 75000                                 | 135.19       |
| 2                                        | ZEE ENT ENT LTD       | 25000   | 276.83        | 6920750   |            |              |            | 25000                                 | 276.83       |
| TOTAL - OUTSTANDING                      |                       |         |               | 17059000  |            |              |            |                                       |              |
| NET TOTAL CASH - A                       |                       |         |               | 17059000  |            |              |            |                                       |              |
| BOOKED P&L FROM 03/04/2023               |                       |         |               |           |            |              |            |                                       |              |
| 1                                        | ICICI BANK            | 25000   | 63.97         | 1599250   | (25000)    | 68.49        | (1712250)  |                                       |              |
| 2                                        | PIRAMAL PHARMA        | 40000   | 71.08         | 2843200   | (40000)    | 82.58        | (3294400)  |                                       |              |
| 3                                        | RELIANCE 160 FIN      | 100000  | 114.30        | 11430000  | (100000)   | 138.21       | (13821000) |                                       |              |
| 4                                        | JP ASSOCIATES         | 100000  | 8.55          | 855000    | (100000)   | 18.72        | (1872000)  |                                       |              |
| 5                                        | PAASCOGATES           | 40000   | 7.00          | 280000    | (40000)    | 10.86        | (434400)   |                                       |              |
| 6                                        | JP POWER              | 1000000 | 8.57          | 8570000   | (1000000)  | 9.81         | (9810000)  |                                       |              |
| 7                                        | INDIAN ENERGY EXC     | 25000   | 125.18        | 3129500   | (25000)    | 135.66       | (3391500)  |                                       |              |
| 8                                        | TATA TELE             | 75000   | 82.15         | 6161250   | (75000)    | 84.36        | (6327000)  |                                       |              |
| 9                                        | DE VYAM INTERNATIONAL | 5000    | 190.84        | 954200    | (5000)     | 194.17       | (970850)   |                                       |              |
| TOTAL BOOKED P&L - B                     |                       |         |               | 3637650   |            | (4486000.00) |            |                                       |              |
|                                          |                       |         |               |           |            |              |            | TOTAL PROFIT (A+B)                    |              |
|                                          |                       |         |               |           |            |              |            | 17059000                              |              |
|                                          |                       |         |               |           |            |              |            | Less: Purchase Expenses               |              |
|                                          |                       |         |               |           |            |              |            | (1712250)                             |              |
|                                          |                       |         |               |           |            |              |            | Less: Sale Expenses                   |              |
|                                          |                       |         |               |           |            |              |            | (59040)                               |              |
|                                          |                       |         |               |           |            |              |            | Less: Interest upto 09/01/2024        |              |
|                                          |                       |         |               |           |            |              |            | (215421)                              |              |
|                                          |                       |         |               |           |            |              |            | Net profit - 03/04/2023 onwards - (A) |              |
|                                          |                       |         |               |           |            |              |            | 1267588                               |              |
|                                          |                       |         |               |           |            |              |            | Net Profit - 31/03/2023 Booked (B)    |              |
|                                          |                       |         |               |           |            |              |            | 1267588                               |              |
|                                          |                       |         |               |           |            |              |            | TOTAL (A+B)                           |              |
|                                          |                       |         |               |           |            |              |            | 2535176                               |              |

**114.4** From the above WhatsApp Chats between Sanjiv Bhasin and Lalit Bhasin, it is noted that there was maintenance of records of trades carried out in Cash Segment along with details of profits made in such trades.

**115.** Investigation has revealed that fund transfers used to happen amongst Noticees which has further been corroborated with evidence of meetings on the day of such fund transfers. It has been shown in the earlier paras that there was maintenance of records of trades carried out/open positions along with profits in both Cash Segment and Futures segment. Such records were shared between Sanjiv Bhasin and Lalit Bhasin regularly and also discussed amongst them for its accuracy on a regular basis. The following paragraphs illustrate date wise records of funds received by Sanjiv Bhasin from Lalit Bhasin and corroborated by evidence of their meeting on such dates, as extracted from the seized data.



Table 97

| Image of Records of funds received by Sanjiv Bhasin from Lalit Bhasin                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Lb</b></p> <p><b>25 received January 2022</b></p> <p>15 received August</p> <p>20 received September</p> <p>13.75 received 11th November</p> <p>9.15 received February</p> <p>15.5 received 26th April 2023</p> <p>9.5 received 12th may 2023</p> <p>22.5 received August 2023</p> <p>15 received 7th October 2023</p> <p>16 received 9th January 2024</p> <p>11.5 received 26th February 2024</p> <p>13.5 received 18th March 2024</p> <p>21.5 received 18th May 2024</p> | <p>This image is a record of “<b>Notes</b>” saved by Sanjiv Bhasin in his phone.</p> <p><b>Contents of the image:</b><br/>Received (25 + 15 + 20+ 13.75 + 9.15 + 15.5 + 9.5 + 22.5 + 15 + 16 + 11.5 + 13.5 + 21.5 = Total 207.9) from <b><u>LB (i.e. Lalit Bhasin)</u></b> on several dates during the period from Jan 2022 to May 2024).</p> <p><b>Inference:</b><br/>Considering the period of investigation which is more than four years and the amount of turnover carried out in the accounts of Venus, Gemini and HB, the amount mentioned in the referred ‘<b>Notes</b>’ of Sanjiv Bhasin can be said to be in lacs and total amount received is ₹207.9 Lacs from Lalit Bhasin during the period from Jan 2022 to May 2024.<br/>Since there is no evidence of bank transfer about the aforesaid transactions, it is inferred that such fund transfers would have been carried out through non-banking channels.</p> |

**116.** The aforesaid record of ‘Notes’ in the aforesaid table indicates that Sanjiv Bhasin had received funds on several dates during the period from Jan 2022 to May 2024 from Lalit Bhasin.

**117.** The succeeding paragraphs discuss about the evidence of meeting between Sanjiv Bhasin and Lalit Bhasin categorically on the dates on which funds were received by Sanjiv Bhasin from Lalit Bhasin. The details of meeting are discussed in the below table:

Table 98

| Images of meeting of Sanjiv Bhasin and Lalit Bhasin on regular basis                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>1. Evidence of Meeting on 11 Nov 2022</b></p> <p>As per the ‘Notes’ extracted from phone of Sanjiv Bhasin, it is observed that on this date, Sanjiv Bhasin had received amount of ₹13.75 lacs from Lalit Bhasin. The following WhatsApp Chats exchanged between Sanjiv Bhasin and Lalit Bhasin indicates that they met on Nov 11, 2022 at Connaught Place, Delhi. It is to be noted that registered offices of Venus, RRB Master and Leo are located at Connaught Place, New Delhi.</p> |



| <div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)<br/>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>See you today evening around 6 in cp</div><div><table><thead><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr></thead><tbody><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>11/11/2022 10:45:04 AM(UTC+5:30)</td><td>11/11/2022 10:51:19 AM(UTC+5:30)</td><td></td></tr></tbody></table></div><div>Status: Read<br/>Platform: Mobile</div><div>11/11/2022 10:45:03 AM(UTC+5:30)</div></div> | Participant                                                                                                                                                                                                                                                                                                   | Delivered                        | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 11/11/2022 10:45:04 AM(UTC+5:30) | 11/11/2022 10:51:19 AM(UTC+5:30) |  | <div><div>Date: 11 Nov 2022</div><div>Content of Chat:<br/>Sanjiv Bhasin texted Lalit Bhasin: "See you today evening around 6 in cp"</div><div>Inference:<br/>On this day, Sanjiv Bhasin asked Lalit Bhasin to meet at 6:00 PM at CP (Connaught Place).</div></div> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------|--------|------------------------------------------|----------------------------------|----------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Delivered                                                                                                                                                                                                                                                                                                     | Read                             | Played |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 11/11/2022 10:45:04 AM(UTC+5:30)                                                                                                                                                                                                                                                                              | 11/11/2022 10:51:19 AM(UTC+5:30) |        |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |
| <div><div>From: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Hi request to pl meet at 5 or 5.30 as hv to leave a little early.</div><div>Platform: Mobile</div><div>11/11/2022 10:51:58 AM(UTC+5:30)</div></div>                                                                                                                                                                                                                                                                                                                                     | <div><div>Date: 11 Nov 2022</div><div>Content:<br/>Lalit Bhasin texted Sanjiv Bhasin - "Hi request to pl meet at 5 or 5:30 as hv to leave a little early".</div><div>Inference:<br/>In response to Sanjiv Bhasin message, Lalit Bhasin requested him to pre-pone the meeting to 05 PM or 05:30PM.</div></div> |                                  |        |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |
| <div><div>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)<br/>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Ok 5.</div><div><table><thead><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr></thead><tbody><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>11/11/2022 11:05:47 AM(UTC+5:30)</td><td>11/11/2022 11:06:06 AM(UTC+5:30)</td><td></td></tr></tbody></table></div><div>Status: Read<br/>Platform: Mobile</div><div>11/11/2022 11:05:45 AM(UTC+5:30)</div></div>                                | Participant                                                                                                                                                                                                                                                                                                   | Delivered                        | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 11/11/2022 11:05:47 AM(UTC+5:30) | 11/11/2022 11:06:06 AM(UTC+5:30) |  | <div><div>Date: 11 Nov 2022</div><div>Content:<br/>Sanjiv Bhasin texted Lalit Bhasin - "Ok 5."</div><div>Inference:<br/>Sanjiv Bhasin acknowledge the request of Lalit Bhasin.</div></div>                                                                          |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Delivered                                                                                                                                                                                                                                                                                                     | Read                             | Played |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 11/11/2022 11:05:47 AM(UTC+5:30)                                                                                                                                                                                                                                                                              | 11/11/2022 11:06:06 AM(UTC+5:30) |        |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |
| <div><div>From: [REDACTED]@s.whatsapp.net Lalit bhasin 2</div><div>Thanks</div><div>Platform: Mobile</div><div>11/11/2022 11:06:12 AM(UTC+5:30)</div></div>                                                                                                                                                                                                                                                                                                                                                                                                | <div><div>Date: 11 Nov 2022</div><div>Content:<br/>Lalit Bhasin texted Sanjiv Bhasin- "Thanks"</div><div>Inference:<br/>After acknowledging the message from Sanjiv Bhasin, Lalit Bhasin thanked Sanjiv Bhasin.</div></div>                                                                                   |                                  |        |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |
| <div><div>2. Evidence of Meeting on Jan 09, 2024</div><div>As per the 'Notes' extracted from phone of Sanjiv Bhasin, it is observed that on this date, Sanjiv Bhasin had received amount of ₹16.00 lacs from Lalit Bhasin. The following WhatsApp Chats exchanged between Sanjiv Bhasin and Lalit Bhasin indicates that they met on Jan 09,2024 at Connaught Place, Delhi. It is to be noted that registered offices of Venus, RRB Master and Leo are located at Connaught Place.</div></div>                                                              |                                                                                                                                                                                                                                                                                                               |                                  |        |        |                                          |                                  |                                  |  |                                                                                                                                                                                                                                                                     |



| <p>From: [REDACTED]@s.whatsapp.net Lalit bhasin 2</p> <p>I will leave by 6.30-6.45</p> <p>Status: Read</p> <p>Platform: Mobile</p> <p>1/9/2024 2:00:50 PM(UTC+5:30)</p>                                                                                                                                                                                                                                                                                                                              | <p><b>Date: Jan 09, 2024</b></p> <p><b>Content:</b><br/>Lalit Bhasin texted Sanjiv Bhasin - "<i>I will leave by 06:30 – 06:45</i>"</p> <p><b>Inference:</b><br/>On this day, Lalit Bhasin informed Sanjiv Bhasin that he would leave by 06:30 – 06.45.</p> |                               |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------|--------|------------------------------------------|-------------------------------|-------------------------------|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)</p> <p>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</p> <p>Ok</p> <table><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>1/9/2024 2:01:01 PM(UTC+5:30)</td><td>1/9/2024 2:01:11 PM(UTC+5:30)</td><td></td></tr></table> <p>Status: Read</p> <p>Platform: Mobile</p> <p>1/9/2024 2:00:59 PM(UTC+5:30)</p>                                                | Participant                                                                                                                                                                                                                                                | Delivered                     | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 1/9/2024 2:01:01 PM(UTC+5:30) | 1/9/2024 2:01:11 PM(UTC+5:30) |  | <p><b>Date: Jan 09, 2024</b></p> <p><b>Content:</b><br/>Sanjiv Bhasin texted Lalit Bhasin- "<i>Ok</i>"</p> <p><b>Inference:</b><br/>Sanjiv Bhasin acknowledged the message of Lalit Bhasin.</p>                                                                                                    |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Delivered                                                                                                                                                                                                                                                  | Read                          | Played |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1/9/2024 2:01:01 PM(UTC+5:30)                                                                                                                                                                                                                              | 1/9/2024 2:01:11 PM(UTC+5:30) |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
| <p>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)</p> <p>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</p> <p>Will make it by 5</p> <table><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>1/9/2024 2:01:09 PM(UTC+5:30)</td><td>1/9/2024 2:01:11 PM(UTC+5:30)</td><td></td></tr></table> <p>Status: Read</p> <p>Platform: Mobile</p> <p>1/9/2024 2:01:08 PM(UTC+5:30)</p>                                 | Participant                                                                                                                                                                                                                                                | Delivered                     | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 1/9/2024 2:01:09 PM(UTC+5:30) | 1/9/2024 2:01:11 PM(UTC+5:30) |  | <p><b>Date: Jan 09, 2024</b></p> <p><b>Content:</b><br/>Sanjiv Bhasin texted Lalit Bhasin - "<i>Will make it by 5</i>"</p> <p><b>Inference:</b><br/>As per the message of Lalit Bhasin of leaving early, Sanjiv Bhasin preponed the meeting time to 05 PM.</p>                                     |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Delivered                                                                                                                                                                                                                                                  | Read                          | Played |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1/9/2024 2:01:09 PM(UTC+5:30)                                                                                                                                                                                                                              | 1/9/2024 2:01:11 PM(UTC+5:30) |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
| <p>From: [REDACTED]@s.whatsapp.net Lalit bhasin 2</p> <p>Ok</p> <p>Status: Read</p> <p>Platform: Mobile</p> <p>1/9/2024 2:01:13 PM(UTC+5:30)</p>                                                                                                                                                                                                                                                                                                                                                     | <p><b>Date: Jan 09, 2024</b></p> <p><b>Content:</b><br/>Lalit Bhasin texted Sanjiv Bhasin: "<i>Ok</i>"</p> <p><b>Inference:</b><br/>Subsequently, Lalit Bhasin acknowledged Sanjiv Bhasin's message of meeting early.</p>                                  |                               |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
| <p>From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)</p> <p>To: [REDACTED]@s.whatsapp.net Lalit bhasin 2</p> <p>On my way</p> <p>Kindly order 2 mushrooms patties</p> <table><tr><th>Participant</th><th>Delivered</th><th>Read</th><th>Played</th></tr><tr><td>[REDACTED]@s.whatsapp.net Lalit bhasin 2</td><td>1/9/2024 4:15:52 PM(UTC+5:30)</td><td>1/9/2024 4:16:35 PM(UTC+5:30)</td><td></td></tr></table> <p>Status: Read</p> <p>Platform: Mobile</p> <p>1/9/2024 4:15:46 PM(UTC+5:30)</p> | Participant                                                                                                                                                                                                                                                | Delivered                     | Read   | Played | [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 1/9/2024 4:15:52 PM(UTC+5:30) | 1/9/2024 4:16:35 PM(UTC+5:30) |  | <p><b>Date: Jan 09, 2024</b></p> <p><b>Content:</b><br/>Sanjiv Bhasin texted Lalit Bhasin: "<i>On my way.... kindly order 2 mushroom patties.</i>"</p> <p><b>Inference:</b><br/>Sanjiv Bhasin again texted Lalit Bhasin that he was on the way and also asked him to order 2 mushroom patties.</p> |
| Participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Delivered                                                                                                                                                                                                                                                  | Read                          | Played |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |
| [REDACTED]@s.whatsapp.net Lalit bhasin 2                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1/9/2024 4:15:52 PM(UTC+5:30)                                                                                                                                                                                                                              | 1/9/2024 4:16:35 PM(UTC+5:30) |        |        |                                          |                               |                               |  |                                                                                                                                                                                                                                                                                                    |



### 3. Evidence of Meeting on Feb 26, 2024

As per the 'Notes' extracted from iPhone of Sanjiv Bhasin, it is observed that on this date, Sanjiv Bhasin had received amount of ₹11.50 lacs from Lalit Bhasin. The following WhatsApp Chats exchanged between Sanjiv Bhasin and Lalit Bhasin indicates that they met on Feb 26, 2024 at Connaught Place, Delhi. It is to be noted that registered offices of Venus, RRB Master and Leo are located at Connaught Place, New Delhi.

From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)  
To: [REDACTED]@s.whatsapp.net Lalit bhasin 2

Jai Mata Di  
See you around 6 in cp today evening

| Participant                              | Delivered                       | Read                            | Played |
|------------------------------------------|---------------------------------|---------------------------------|--------|
| [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 2/26/2024 12:33:47 PM(UTC+5:30) | 2/26/2024 12:34:01 PM(UTC+5:30) |        |

Status: Read  
Platform: Mobile

2/26/2024 12:33:44 PM(UTC+5:30)

**Date: Feb 26, 2024**

**Content:**

Sanjiv Bhasin texted Lalit Bhasin: "Jai Mata Di.... See you around 6 in CP today evening."

**Inference:**

Sanjiv Bhasin asked Lalit Bhasin to meet at 06 PM at the CP (Connaught Place).

From: [REDACTED]@s.whatsapp.net Lalit bhasin 2

JMD Yes

Status: Read

Platform: Mobile

2/26/2024 12:34:15 PM(UTC+5:30)

**Date: Feb 26, 2024**

**Content:**

Lalit Bhasin texted Sanjiv Bhasin - "JMD Yes" (JMD means ... "Jai Mata Di")

**Inference:**

Lalit Bhasin agreed with Sanjiv Bhasin's proposal to meet.

### 4. Evidence of Meeting on May 18, 2024

As per the 'Notes' extracted from iPhone of Sanjiv Bhasin, it is observed that on this date, Sanjiv Bhasin had received amount of ₹21.50 lacs from Lalit Bhasin. The following WhatsApp Chats exchanged between Sanjiv Bhasin and Lalit Bhasin indicates that they met on May 18, 2024 at Connaught Place, New Delhi.

From: [REDACTED]@s.whatsapp.net sanjiv bhasin (owner)  
To: [REDACTED]@s.whatsapp.net Lalit bhasin 2

See you @1.30 in Cp

| Participant                              | Delivered                      | Read                            | Played |
|------------------------------------------|--------------------------------|---------------------------------|--------|
| [REDACTED]@s.whatsapp.net Lalit bhasin 2 | 5/18/2024 9:48:52 AM(UTC+5:30) | 5/18/2024 10:32:43 AM(UTC+5:30) |        |

Status: Read  
Platform: Mobile

5/18/2024 9:48:50 AM(UTC+5:30)

**Date: May 18, 2024**

**Content:**

Sanjiv Bhasin texted Lalit Bhasin - "See you @1:30 in CP"

**Inference:**

Sanjiv Bhasin asked Lalit Bhasin to meet at 01:30 PM at the CP (Connaught Place).

From: [REDACTED]@s.whatsapp.net Lalit bhasin 2

Ok

Status: Read

Platform: Mobile

5/18/2024 10:32:48 AM(UTC+5:30)

**Date: May 18, 2024**

**Content:**

Lalit Bhasin texted Sanjiv Bhasin - "Ok"

**Inference:**

Lalit Bhasin agreed with Sanjiv Bhasin's proposal to meet.





118. Upon a perusal of contents of the WhatsApp chats and meetings of Sanjiv Bhasin and Lalit Bhasin, it is *prima facie* held that Lalit Bhasin was aware of the fact that alleged fraudulent trades were being carried out by Sanjiv Bhasin in accounts of Venus, Gemini and HB through the dealers of RRB Master, viz. Rajiv and Jagat. Further, it has also been inferred that there was maintenance of records of trades being carried out/open positions along with profits in both Cash Segment and Future segments. Such records were shared between Sanjiv Bhasin and Lalit Bhasin regularly. These records were also verified and modified based on actuals as pointed out by Sanjiv Bhasin. The notes maintained by Sanjiv Bhasin collected during the investigation conclusively establish that Sanjiv Bhasin received funds from Lalit Bhasin during in person meetings mostly held at Connaught Place.
119. In view of the above, it is *prima facie* seen that the profit earned through trades being carried out by Sanjiv Bhasin through dealers of RRB Master in trading accounts of Venus, Gemini and HB was regularly being shared with him by Lalit Bhasin through non-banking/cash channels on several dates and the same is also corroborated by their meetings on those dates.

#### **J. EXAMINATION OF VIOLATION OF PROVISIONS OF THE SEBI ACT AND REGULATIONS MADE THEREUNDER**

120. Having examined the matching trades executed in the accounts of Profit Makers, it become imperative, now to carry out further examination as to whether these acts on the part of *Noticees* can *prima facie* be held in violation of provisions of clauses (a), (b), (c) and (e) of section 12A of the Securities and Exchange Board of India Act, 1992 and clauses (a), (b), (c), (d) of regulation 3, sub-regulation (1) of regulation 4 and clause (d) of sub regulation (2) of regulation 4 of the PFUTP Regulations, and sub-regulation (2) of regulation 16 and sub-regulation (2) of regulation (21) of the RA Regulations. In case the answer to the above is in affirmative, it is to be examined whether the facts of the matter warrant an urgent action in exercising power bestowed under the provisions of section 11, section 11B of the SEBI Act and clause (d)



of sub-regulation 1 of regulation 11 of the PFUTP Regulations. Before proceeding further, it is necessary to refer the relevant provisions of law which are reproduced here under for reference:

***“SEBI Act, 1992***

***Functions of Board.***

***Section 11.***

*(1) Subject to the provisions of this Act, it shall be the duty of the Board to protect the interests of investors in securities and to promote the development of, and to regulate the securities market, by such measures as it thinks fit.*

*....*

*(4) Without prejudice to the provisions contained in sub-sections (1), (2), (2A) and (3) and section 11B, the Board may, by an order, for reasons to be recorded in writing, in the interests of investors or securities market, take any of the following measures, either pending investigation or inquiry or on completion of such investigation or inquiry, namely: —*

*....*

- (a) suspend the trading of any security in a recognised stock exchange;*
- (b) restrain persons from accessing the securities market and prohibit any person associated with securities market to buy, sell or deal in securities;*
- (c) suspend any office-bearer of any stock exchange or self-regulatory organisation from holding such position;*
- (d) impound and retain the proceeds or securities in respect of any transaction which is under investigation;*

*....*

*(4A) Without prejudice to the provisions contained in sub-sections (1), (2), (2A), (3) and (4), section 11B and section 15-I, the Board may, by an order, for reasons to be recorded in writing, levy penalty under sections 15A, 15B, 15C, 15D, 15E, 15EA, 15EB, 15F, 15G, 15H, 15HA and 15HB after holding an inquiry in the prescribed manner.*





***Power to issue directions and levy penalty.***

***Section 11B.***

*(1) Save as otherwise provided in section 11, if after making or causing to be made an enquiry, the Board is satisfied that it is necessary,—*

*(i) in the interest of investors, or orderly development of securities market; or*

*(ii) to prevent the affairs of any intermediary or other persons referred to in section 12 being conducted in a manner detrimental to the interest of investors or securities market; or*

*(iii) to secure the proper management of any such intermediary or person, it may issue such directions,—*

*(a) to any person or class of persons referred to in section 12, or associated with the securities market; or*

*(b) to any company in respect of matters specified in section 11A, as may be appropriate in the interests of investors in securities and the securities market.*

*Explanation. — For the removal of doubts, it is hereby declared that the power to issue directions under this section shall include and always be deemed to have been included the power to direct any person, who made profit or averted loss by indulging in any transaction or activity in contravention of the provisions of this Act or regulations made thereunder, to disgorge an amount equivalent to the wrongful gain made or loss averted by such contravention.*

*(2) Without prejudice to the provisions contained in sub-section (1), subsection (4A) of section 11 and section 15-I, the Board may, by an order, for reasons to be recorded in writing, levy penalty under sections 15A, 15B, 15C, 15D, 15E, 15EA, 15EB, 15F, 15G, 15H, 15HA and 15HB after holding an inquiry in the prescribed manner.*



***Prohibition of manipulative and deceptive devices, insider trading and substantial acquisition of securities or control***

***Section 12A***

*No person shall directly or indirectly—*

- (a) use or employ, in connection with the issue, purchase or sale of any securities listed or proposed to be listed on a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of this Act or the rules or the regulations made thereunder;*
- (b) employ any device, scheme or artifice to defraud in connection with issue or dealing in securities which are listed or proposed to be listed on a recognised stock exchange;*
- (c) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person, in connection with the issue, dealing in securities which are listed or proposed to be listed on a recognised stock exchange, in contravention of the provisions of this Act or the rules or the regulations made thereunder*  
*....*
- (e) deal in securities while in possession of material or non-public information or communicate such material or non-public information to any other person, in a manner which is in contravention of the provisions of this Act or the rules or the regulations made thereunder.*

***Delegation.***

***Section 19***

*The Board may, by general or special order in writing delegate to any member, officer of the Board or any other person subject to such conditions, if any, as may be specified in the order, such of its powers and functions under this Act (except the powers under section 29) as it may deem necessary.*



## **Contravention by companies.**

### **Section 27**

*(1) Where a contravention of any of the provisions of this Act or any rule, regulation, direction or order made thereunder has been committed by a company, every person who at the time the contravention was committed was in charge of, and was responsible to, the company for the conduct of the business of the company, as well as the company, shall be deemed to be guilty of the contravention and shall be liable to be proceeded against and punished accordingly:*

*Provided that nothing contained in this sub-section shall render any such person liable to any punishment provided in this Act, if he proves that the contravention was committed without his knowledge or that he had exercised all due diligence to prevent the commission of such contravention.*

*(2) Notwithstanding anything contained in sub-section (1), where an contravention under this Act has been committed by a company and it is proved that the contravention has been committed with the consent or connivance of, or is attributable to any neglect on the part of, any director, manager, secretary or other officer of the company, such director, manager, secretary or other officer shall also be deemed to be guilty of the contravention and shall be liable to be proceeded against and punished accordingly.*

*Explanation.— For the purposes of this section,—*

*(a) “company” means any body corporate and includes a firm or other association of individuals; and*

*(b) “director”, in relation to a firm, means a partner in the firm.*

## **The PFUTP Regulations**

### **Definitions**

#### **Regulation 2**

*(1) In these regulations, unless the context otherwise requires, —*

*...*



(c) “fraud” includes any act, expression, omission or concealment committed whether in a deceitful manner or not by a person or by any other person with his connivance or by his agent while dealing in securities in order to induce another person or his agent to deal in securities, whether or not there is any wrongful gain or avoidance of any loss, and shall also include—

- (1) a knowing misrepresentation of the truth or concealment of material fact in order that another person may act to his detriment;
- (2) a suggestion as to a fact which is not true by one who does not believe it to be true;
- (3) an active concealment of a fact by a person having knowledge or belief of the fact;
- (4) a promise made without any intention of performing it;
- (5) a representation made in a reckless and careless manner whether it be true or false;
- (6) any such act or omission as any other law specifically declares to be fraudulent,
- (7) deceptive behaviour by a person depriving another of informed consent or full participation,
- (8) a false statement made without reasonable ground for believing it to be true.
- (9) the act of an issuer of securities giving out misinformation that affects the market price of the security, resulting in investors being effectively misled even though they did not rely on the statement itself or anything derived from it other than the market price.

And “fraudulent” shall be construed accordingly;

Nothing contained in this clause shall apply to any general comments made in good faith in regard to—

- (a) the economic policy of the government
- (b) the economic situation of the country
- (c) trends in the securities market or



*(d) any other matter of a like nature whether such comments are made in public or in private;*

### ***Prohibition of certain dealings in securities***

#### ***Regulation 3.***

##### ***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 thereunder;*
- (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 thereunder.*

### ***Prohibition of manipulative, fraudulent and unfair trade practices***

#### ***Regulation 4***

- (1) Without prejudice to the provisions of regulation 3, no person shall indulge in a manipulative, fraudulent or an unfair trade practice in securities markets.*

*Explanation. – For the removal of doubts, it is clarified that-*

- (i) any act of diversion, misutilisation or siphoning off of assets or earnings of a company whose securities are listed or any concealment of such act or any device, scheme or artifice to manipulate the books of accounts or financial statement of such a company that would directly or indirectly manipulate the price of securities of that company, or*



*(ii) transactions through mule accounts for indulging in manipulative, fraudulent and unfair trade practice shall be and shall always be deemed to have been included in sub-regulation (1).*

*(2) Dealing in securities shall be deemed to be a manipulative, fraudulent or an unfair trade practice if it involves any of the following]:—*

*.....*

*(d) inducing any person for dealing in any securities for artificially inflating, depressing, maintaining or causing fluctuation in the price of securities through any means including by paying, offering or agreeing to pay or offer any money or money's worth, directly or indirectly, to any person;*

### **Regulation 11**

*(1) The Board may, without prejudice to the provisions contained in sub-sections (1), (2), (2A) and (3) of section 11 and section 11B of the Act, by an order, for reasons to be recorded in writing, in the interests of investors and securities market, issue or take any of the following actions or directions, either pending investigation or enquiry or on completion of such investigation or enquiry, namely: —*

*(a) suspend the trading of the security found to be or prima facie found to be involved in fraudulent and unfair trade practice in a recognized stock exchange;*

*(b) restrain persons from accessing the securities market and prohibit any person associated with securities market to buy, sell or deal in securities;*

*(c) suspend any office-bearer of any stock exchange or self-regulatory organization from holding such position;*

*(d) impound and retain the proceeds or securities in respect of any transaction which is in violation or prima facie in violation of these regulations;*



(e) direct and intermediary or any person associated with the securities market in any manner not to dispose of or alienate an asset forming part of a fraudulent and unfair transaction;

(f) require the person concerned to call upon any of its officers, other employees or representatives to refrain from dealing in securities in any particular manner;

(g) prohibit the person concerned from disposing of any of the securities acquired in contravention of these regulations;

(h) direct the person concerned to dispose of any such securities acquired in contravention of these regulations, in such manner as the Board may deem fit, for restoring the status quo ante;

### **SEBI (Research Analyst) Regulations, 2014**

#### **Regulation 2(1)**

(c) "associate" means an associate as defined in Securities and Exchange Board of India (Intermediaries) Regulations, 2008;

(u) "research analyst" means a person who is primarily responsible for, -

i. preparation or publication of the content of the research report; or

ii. providing research report; or

iii. making 'buy/sell/hold' recommendation; or

iv. giving price target; or

v. offering an opinion concerning public offer, with respect to securities that are listed or to be listed in a stock exchange, whether or not any such person has the job title of 'research analyst' and includes any other entities engaged in issuance of research report or research analysis.

*Explanation.- The term also includes any associated person who reports directly or indirectly to such a research analyst in connection with activities provided above*

### **Limitation on trading by research analysts**

#### **Regulation 16**

....





*(2) Independent research analysts, individuals employed as research analyst by research entity or their associates shall not deal or trade in securities that the research analyst recommends or follows within thirty days before and five days after the publication of a research report.*

### **Recommendations in public media**

#### **Regulation 21**

....

*(2) If any person including a director or employee of an investment adviser or credit rating agency or asset management company or fund manager, makes public appearance or makes a recommendation or offers an opinion concerning securities or public offers through public media, all the provisions of regulations 16 and 17 shall apply mutatis mutandis to him and he shall disclose his name, registration status and details of financial interest in the subject company at the time of,-*

- (i) making such recommendation or offering such opinion in personal capacity;*
- (ii) responding to queries from audiences or journalists in personal capacity;*
- (iii) communicating the research report or substance of the research report through the public media.*

### **SEBI (Intermediaries) Regulations, 2008**

#### **Definitions**

#### **Regulation 2**

....

*(1)(b) “associate” means any person controlled, directly or indirectly, by the intermediary, or any person who controls, directly or indirectly, the intermediary, or any entity or person under common control with such intermediary, and where such intermediary is a natural person will include any relative of such intermediary and where such intermediary is a body corporate will include its group companies (as defined in the Monopolies*



*and Restrictive Trade Practices Act, 1969 (Act No. 54 of 1969) or any re-enactment thereof) or companies under the same management;”*

**121.** I note that clause (c) of sub-regulation (1) of regulation (2) of the PFUTP Regulations provides an inclusive and broad definition of fraud, which also includes any *act or omission as any other law specifically declares to be fraudulent*. I further note that clauses (a), (b), (c) and (e) of section 12A of the SEBI Act, 1992 and regulations 3 and 4 of the PFUTP Regulations quoted above, prohibit:

- i. dealing in securities which is manipulative, fraudulent or an unfair trade practice;
- ii. use of or employment of any manipulative or deceptive device or contrivance, in contravention of the provisions of the SEBI Act or rules or regulations made thereunder;
- iii. employment of any device scheme or artifice to defraud;
- iv. engagement in any act, practice, course of business which operate/would operate as fraud or deceit upon any person in contravention of the provisions of the SEBI Act or rules or regulations; or
- v. dealing in securities while in possession of material or non-public information or communicate such material or non-public information to any other person in contravention of the provisions of the SEBI Act or rules or regulations made thereunder.

**122.** In the earlier part of this Order, it has been examined and demonstrated with evidence that how *Noticees* devised/employed a scheme wherein positions (mostly buy) were created in scrips prior to recommendations and as per the instructions of the *Noticee No. 1* to dealers. The information regarding the scrip to be recommended was a material, non-public information on account of its likely impact on price/ volume of the scrip. Once recommendations were made in public through various Media Channels/Telegram, contrary trades were placed in the same scrip on the instructions of the *Noticee No. 1*, and alleged



huge ill-gotten gains were made by *Noticees* to the tune of ₹11.37 crores at the cost of the innocent investors. The acts of *Noticees* herein would *prima facie* fall under the definition of fraud and therefore, adopting the practice of carrying out such trades is in *prima facie* violation of provisions of section 12A of the SEBI Act and Regulations 3 and 4 of the PFUTP Regulations

**123.** It will be relevant here to refer to the Palmer's Company Law, 25th Edition (2010), Volume 2 at page 11097 wherein the following has been stated: *"Market manipulation is normally regarded as the "unwarranted" interference in the operation of ordinary market forces of supply and demand and thus undermines the "integrity" and efficiency of the market."* The facts of this case clearly show that *Noticees* devised a scheme to interfere in the ordinary operation of market forces of supply and demand to make unlawful gains for themselves and eventually succeeded in making alleged huge ill-gotten gains. Thus, this would *prima facie* qualify as manipulation and the scheme that they devised would qualify as a manipulative scheme.

**124.** Further, reliance is placed on the observations of Hon'ble Supreme Court in the matter of **SEBI and Ors. vs. Shri Kanaiyalal Baldevbhai Patel and Ors.** (2017 SCC Online SC 1148), wherein the following was held:

*"31. Although unfair trade practice has not been defined under the regulation, various other legislations in India have defined the concept of unfair trade practice in different contexts. A clear cut generalized definition of the 'unfair trade practice' may not be possible to be culled out from the aforesaid definitions. Broadly trade practice is unfair if the conduct undermines the ethical standards and good faith dealings between parties engaged in business transactions. It is to be noted that unfair trade practices are not subject to a single definition; rather it requires adjudication on case to case basis. Whether an act or practice is unfair is to be determined by all the facts and circumstances surrounding the transaction. In the context of this regulation a trade practice may be unfair, if the conduct undermines the good faith dealings involved in the transaction. Moreover, the concept of*



*‘unfairness’ appears to be broader than and includes the concept of ‘deception’ or ‘fraud’. .....Coupled with the above, is the fact, the said conduct can also be construed to be an act of unfair trade practice, which though not a defined expression, has to be understood comprehensively to include any act beyond a fair conduct of business including the business in sale and purchase of securities.”*

- 125.** In the instant case also, it can be seen that the conduct of *Noticees* cannot be said to be in conformity with the ethical standards and good faith dealings between Guest Expert and the investors. Investors who follow Guest Expert’s advice could not have believed that the recommendations are made not on the basis of research but on the basis of malafide intention of making profit in own accounts by increasing volume and price through the recommendations. The *Noticees prima facie* devised a manipulative practice which has been further corroborated by transcripts between the *Noticee No. 1* and dealers while placing orders in the trading accounts of Profit Makers, the quantities of order placement matching with the exact number as being instructed by the *Noticee No. 1*. The connections amongst *Noticees* and a holistic examination of evidences available on record clearly shows that acts of *Noticees* can be termed as *prima facie* manipulative and unfair trade practices, apart from being fraudulent. Further, as shown earlier, there was *prima facie* regular profit sharing through cash channels between Sanjiv Bhasin and Lalit Bhasin.
- 126.** In view of the factual analysis and legal discussion so far in this order, I deem it appropriate to hold that there is a *prima facie* case of manipulative, fraudulent and unfair trade practice carried out by *Noticees*, which ultimately generated huge amount of unlawful gains (approximately ₹11.37 Crore) as discussed earlier, in accounts of *Noticee Nos. 3, 5, 6 and 8 to 12*.
- 127.** Accordingly, it is *prima facie* held that *Noticees* have violated the following provisions of law:
- i. *Noticee No.1* has violated provisions of clauses (a), (b), (c) and (e) of Section 12A of the SEBI Act, r/w clauses (a), (b), (c) and (d) of Regulation



3, sub-regulation (1) of regulation (4), clause (d) of sub-regulation (2) of regulation (4) of the PFUTP Regulations.

- ii. *Noticee Nos. 2 to 12 have violated provisions of clauses (a), (b), (c) and (e) of Section 12A of the SEBI Act, r/w clauses (a), (b), (c) and (d) of Regulation 3, and sub-regulation (1) of regulation (4) of the PFUTP Regulations.*

**128.** It is imperative to note here that during the statement recording under oath, *Noticee No. 1* submitted the following w.r.t. the capacity under which recommendations were being given by him on various news channels:

*“Q.2 How are you related to IIFL?”*

*A.2 I was appointed as Executive Vice President in year 2015 at IIFL. Subsequently, I was appointed as Director Equity Research in the year 2018-19. Thereafter, I was appointed as Consultant in the year 2022-23 till June 2024.”*

*“Q.3 Under what capacity you are recommending scrips?”*

*A.3 IIFL has been registered as Research Analyst and I my role at IIFL was to publish research reports and give daily stock recommendation either through IIFL daily newsletter “Market Mantra” or appearing in the business news channel on behalf of IIFL.”*

**129.** From the above, it is clear that IIFL was registered as Research Analyst with SEBI and the *Noticee No. 1* was associated with IIFL and used to make stock recommendations by making public appearances in the Media channels. In terms of clause (u) of sub-regulation (1) of regulation (2) of the RA Regulations, the *Noticee No. 1* falls under the definition of a Research Analyst. Sub-regulation (2) of regulation 16 of the RA Regulations restricts dealing/trading in the securities by an associate of Research Analyst in the recommended scrips for a specified time period. Further sub-regulation (2) of regulation (21) of the RA Regulations provides that the research analyst shall disclose his name, registration status and details of financial interest in the subject company at the time of making such recommendation or



communicating the substance of research report through the public media. As brought out hereinabove in various examples, investigation revealed that the *Noticee No. 1* had dealt in the scrips, by placing orders through instructions to dealers of the *Noticee No. 4*, which he had earlier recommended through public appearances, within the time stipulated in sub-regulation (2) of regulation 16 of the RA Regulations, thereby violating the same.

- 130.** It is therefore, *prima facie* held that the *Noticee No. 1* has also violated provisions of sub-regulation (2) of regulation 16 and sub-regulation (2) of regulation 21 of the RA Regulations by sharing information related to the recommendations to be broadcasted on various Media Channels with the dealers of *Noticee No. 4* and further instructed them to place contrary trades in respect of scrips recommended by him earlier, and made unfair profits.

#### **K. LIABILITY OF DIRECTORS/ADVISOR OF THE PROFIT MAKERS**

- 131.** *Noticee No. 2/Lalit Bhasin* acted as an Advisor of *Noticee Nos. 7 and 8* and in the capacity of being an Advisor authorised *Noticee No. 1* to instruct the dealers of *Noticee No. 4* to place trades as per his instructions and make unlawful gains in trading accounts of Venus, Gemini and HB. Further, it has been held in earlier part of this Order, based on the evidence collected during investigation, that Lalit Bhasin was aware about the modus operandi being used by the *Noticee No. 1* and unlawful trades being done in these trading accounts.
- 132.** As per Section 27 of the SEBI Act, any person who was in charge of or responsible to the company for the conduct of the business of the company shall be deemed to be guilty of this provision along with the company, and be held liable accordingly. It has been revealed during the investigation that other Directors in these companies *viz.* Venus and Gemini were namesake Directors and were not involved in the day-to-day management of affairs of these companies.



133. The *Noticee No. 2* being the Advisor and major shareholder of these entities/companies was responsible for taking decisions in these companies.

134. In order to ascertain the liability of the persons responsible for the conduct of business of *Noticee Nos. 4, 8, 9, 10 and 11*, a table has been prepared below showing the details of directors/Persons who were in charge of, and were responsible to, the company for the conduct of its business during the Investigation Period and the role played by them:

Table 99

| Name                                     | Designation                                                                                                                                                | Whether Charged | Rationale for charging or not charging the director                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Lalit Bhasin<br>( <i>Noticee No. 2</i> ) | i. Advisor in Venus Portfolios Pvt. Ltd. and Gemini Portfolios Pvt. Ltd.<br>ii. Director in RRB Master<br>iii. Executive Director in HB Stockholdings Ltd. | Yes             | Lalit Bhasin was the Advisor in Venus and Gemini during the time of contravention by these companies and in charge of and responsible for the conduct of their business. Further, <i>Noticee No. 2</i> was an Executive Director in HB and managed day to day affairs of HB. <i>Noticee No. 2</i> was also Director of RRB Master and played an active role in the manipulation. The details of role played by <i>Noticee No. 2</i> in the matter have been elaborated in the preceding paras of this Order. Hence, he is <i>prima facie</i> liable for the contraventions committed by Venus, Gemini, HB and RRB Master. |
| Ashish Kapur<br>( <i>Noticee No. 3</i> ) | i. Director in Leo Portfolios Pvt. Ltd.<br>ii. Managing Director in RRB Master                                                                             | Yes             | <i>Noticee No. 3</i> was the Managing Director of RRB Master. <i>Noticee No. 3</i> had authorised dealers of <i>Noticee No. 4</i> to place trades in trading accounts of Venus and Gemini as per instructions of <i>Noticee No. 1</i> . Further, <i>Noticee No. 3</i> was the authorised signatory for placing orders in the trading account of Leo with RRB Master. Hence, he is <i>prima facie</i> liable for the contraventions committed by RRB Master and Leo.                                                                                                                                                       |
| Megh Shyam Sharma                        | Independent Director in in Venus Portfolios Pvt. Ltd.                                                                                                      | No              | These individuals were Directors of Venus during the period of contravention, however, there is no <i>prima facie</i> evidence on record which proves that they played any part in the contraventions.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Raj Kumar Sharma                         | Professional Director in in Venus Portfolios Pvt. Ltd.                                                                                                     | No              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Arvind Kumar Jain                        | Professional Director in in Gemini Portfolios Pvt. Ltd.                                                                                                    | No              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |





| Name        | Designation                                             | Whether Charged | Rationale for charging or not charging the director                                                                                                                                                           |
|-------------|---------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Murari Lal  | Professional Director in in Gemini Portfolios Pvt. Ltd. | No              | <i>prima facie</i> evidence on record which proves that they played any part in the contraventions.                                                                                                           |
| Mamta Kapur | Director in RRB Master and Leo.                         | No              | The individual was Director of RRB Master and Leo during the period of contravention, however, there is no <i>prima facie</i> evidence on record which proves that she played any part in the contraventions. |

#### L. NEED FOR INTERIM EX-PARTE ORDER

- 135.** The acts carried out by *Noticees* in the instant matter and the manner in which they have been done, are, *prima facie*, in my view, in violation of the provisions of the SEBI Act, 1992, PFUTP Regulations and RA Regulations. In view of the above, it is important to examine as to whether this would be a fit case wherein an interim ex-parte order would require to be passed. SEBI cannot remain a mute spectator when such kind of fraudulent and manipulative activities take place in the securities markets by personalities who are actually revered in the securities markets domain and have a huge following on various social media platforms. SEBI is required to take note when innocent and gullible investors invest huge corpus/amount of money based on ill intended recommendations of such experts, associated with Intermediaries registered with SEBI. What is more distressing to see is that such entities leave no stone unturned in making unlawful gains/profits at the cost of innocent investors.
- 136.** SEBI has time again advised investors in the securities markets to remain diligent, attentive and exercise caution while believing anyone giving stock market recommendations associated with securities markets. *Noticees* herein are individuals who have been associated with securities markets for quite a long time. The *Noticee No. 1* is Director/Consultant of IIFL, a registered SEBI intermediary. It has been shown with the help of numerous examples hereinabove that how the positions earlier taken by the dealers of RRB Master on the basis of recommendations given by Sanjiv Bhasin were immediately reversed by the dealers as soon as the views of such recommendations were



aired on the Media Channels, and huge profits were made at the cost of gullible investors driving the price/volume believing the recommendations to be genuine and true.

**137.** If such fraudulent/manipulative trade practices are not looked down upon by the Regulator of the capital markets, proper message would not go to violators and the faith of investors would be shaken. Thus, it becomes imperative that through interim orders such as the instant one, deterrence is created in the mind of violators to avoid adopting such strategies. At the same time, there is a message required to be given that the regulator is watchful of all such unlawful activities. These steps are essential to ensure that trust of investors is maintained.

**138.** One of the primary duties that has been cast upon SEBI as per provisions of the SEBI Act, 1992 is to protect interests of the investors in the securities markets. In my view, that objective can only be achieved by keeping the securities markets, a level playing field for everyone. No one should be allowed to exploit the same at the cost of investors. The PFUTP Regulations have been framed with an objective of preventing fraudulent and unfair trade practices relating to securities market, which will aid in achieving the mandate of investor protection, regulation and development of securities market.

**139.** In the case of ***Amalendu Mukherjee vs. SEBI*** (A. No. 148/2020 decided on May 27, 2020)<sup>2</sup>, Hon'ble Securities Appellate Tribunal underscored the importance of passing impounding orders and *inter-alia*, observed that:

*"14. .... We are of the opinion that the WTM is empowered under the SEBI Act and the Regulations to pass an ex-parte order in order to protect the interests of securities market and the investors. If such impounding order is not passed, it may result in defeating the ultimate direction of disgorgement if any, as there would be chances of such monies being dissipated by the appellant...."*

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<sup>2</sup> MANU/SB/0384/2020



140. At this stage, it is pointed out that in various instances, the Hon'ble Courts have underscored the need to curb the manipulative and unfair trade practices in the securities market. In one of such cases, the Hon'ble Supreme Court, in the matter of **N Narayanan vs. Adjudicating Officer, SEBI** decided on April 26, 2013, while dealing with the concept of market abuse in securities market *inter alia* held as follows:

*“Prevention of market abuse and preservation of market integrity is the hallmark of Securities Law. Section 12A read with Regulations 3 and 4 of the Regulations 2003 essentially intended to preserve ‘market integrity’ and to prevent ‘Market abuse’. The object of the SEBI Act is to protect the interest of investors in securities and to promote the development and to regulate the securities market, so as to promote orderly, healthy growth of securities market and to promote investors protection. Securities market is based on free and open access to information, the integrity of the market is predicated on the quality and the manner on which it is made available to market. ‘Market abuse’ impairs economic growth and erodes investor’s confidence. Market abuse refers to the use of manipulative and deceptive devices, giving out incorrect or misleading information, so as to encourage investors to jump into conclusions, on wrong premises, which is known to be wrong to the abusers. The statutory provisions mentioned earlier deal with the situations where a person, who deals in securities, takes advantage of the impact of an action, may be manipulative, on the anticipated impact on the market resulting in the “creation of artificiality”.*”

141. In the matter of **SEBI vs Rakhi Trading Pvt. Ltd.**, and other connected appeals decided on February 08, 2018, the Hon'ble Supreme Court observed that *“... market manipulation is a deliberate attempt to interfere with the free and fair operation of the market and create artificial, false or misleading appearances with respect to the price, market, product, security and currency”.*



**142.** In view the above discussion, I am of the view that it is a fit case to pass an interim ex parte order to insulate the securities market from the mischievous acts of *Noticees* and also to prevent these *Noticees* in conducting similar activities which are *prima facie* against the interest of investors as well as against the development of securities market. Further, there is an urgency to protect the unlawful gains from getting siphoned off beyond the regulatory reach. Further, this interim order would also send a message to the market participants that the regulator is watchful of all such unlawful activities and give an assurance to the investors. The order is also a pointer to investors to exercise due diligence before believing any recommendations. This practice of believing market tips blindly can be harmful to investors' interest.

#### **M. JOINT AND SEVERAL LIABILITY OF NOTICEES**

**143.** Having held that in the facts of the present case, invocation of powers to issue interim order is necessitated, the next issue that deserves consideration is fixing of *prima facie* liability for impounding of unlawful gains which accrued due to deployment of fraudulent scheme by *Noticees*. In this connection, I note that the explanation to sub-section (1) of section 11B of the SEBI Act *inter alia* empowers SEBI to issue directions to any person, for disgorgement of wrongful gains made by him, by contravention of any provision of the SEBI Act or the regulations made thereunder.

**144.** The *Noticee No. 1* devised the *prima facie* fraudulent and manipulative scheme and was actively assisted by Enablers. Undeniably, *Noticees* have made total unlawful gains to the tune of ₹11.37 crores as calculated in [Table 94](#) in the order which would need to be impounded to keep the integrity of the securities markets intact and to punish the wrongdoers for the same. The evidences collected during the investigation bring out the manner in which the unlawful gains have been amassed by the *Noticees* by placing trades contrary to the recommendations being given by the *Noticee No. 1* on Media Channels.



**145.** It is worth noting that the *Noticee No. 2* in his statement recording had mentioned earlier that it was decided to share the profits with *Noticee No. 1*, out of such trades as to be done on the recommendations of *Noticee No. 1*, in a ratio of 40:60. However, the same was not formalised and no fixed ratio had been fixed or arrived at. He further clarified that an agreement had been reached with *Noticee No. 1* to ensure that the profits earned in these trading accounts would be retained in the respective trading accounts. In this backdrop, it becomes imperative to understand that in such intricately designed cases wherein the fraudulent activities are planned by the *Noticees* in such an immaculate and clandestine manner, identification of the actual trail of profits becomes a herculean task. As outlined hereinabove, it cannot be denied that unlawful profits have actually been made by *Noticees* by incorporating fraudulent strategies and placing trades on the advice of *Noticee No. 1* contrary to recommendations given by him on Media Channels.

**146.** In view of the aforesaid discussion and the calculation of unlawful gains made by *Noticees* as detailed in [Table 94](#) above, I hold *Noticees* to be *prima facie* jointly and severally liable for impounding of unlawful gains as detailed in the following table. In this table, joint and several liability is calculated based on the role played by each *Noticee* with respect to profit made in various accounts. To illustrate, Sanjiv Bhasin is jointly and severally liable for profit in accounts of *Noticee Nos. 8 to 10* but not in others as profit in these accounts was earned using his information but without his knowledge.

Table 100

| S. No. | Profit Maker / Enabler/<br>Beneficiary / Information<br>misuser<br>(A) | Amount of wrongful<br>gains made (₹)<br>(B) | <i>Noticees</i> jointly and<br>severally liable for<br>impounding of wrongful<br>gains<br>(C) |
|--------|------------------------------------------------------------------------|---------------------------------------------|-----------------------------------------------------------------------------------------------|
| 1      | Ashish Kapur ( <i>Noticee No. 3</i> )                                  | 32,41,797                                   | Ashish Kapur                                                                                  |
| 2      | Rajiv Kapoor ( <i>Noticee No. 5</i> )                                  | 15,33,848                                   | Rajiv Kapoor                                                                                  |
| 3      | Jagat Singh ( <i>Noticee No. 6</i> )                                   | 89,53,370                                   | Jagat Singh                                                                                   |
| 4      | Venus Portfolios Pvt. Ltd. (Venus)<br>( <i>Noticee No. 8</i> )         | 6,31,96,898                                 | Sanjiv Bhasin, Lalit Bhasin,<br>RRB Master, Venus                                             |
| 5      | Gemini Portfolios Pvt. Ltd.<br>(Gemini) ( <i>Noticee No. 9</i> )       | 27,70,036                                   | Sanjiv Bhasin, Lalit Bhasin,<br>RRB Master, Gemini                                            |



| S. No. | Profit Maker / Enabler/ Beneficiary / Information misuser (A) | Amount of wrongful gains made (₹) (B)                                                                     | Noticees jointly and severally liable for impounding of wrongful gains (C) |
|--------|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| 6      | HB Stock Holdings Ltd. (HB)<br>(Noticee No. 10)               | 2,42,37,798                                                                                               | Sanjiv Bhasin, Lalit Bhasin, RRB Master, HB                                |
| 7      | Leo Portfolios P Ltd. (Leo)<br>(Noticee No. 11)               | 65,65,533                                                                                                 | Ashish Kapur & Leo                                                         |
| 8      | Babita Gupta (Noticee No. 12)                                 | 32,19,891                                                                                                 | Praveen Gupta & Babita Gupta                                               |
|        | <b>Total ill-gotten gains</b>                                 | 11,37,19,170/-<br>(Rupees eleven crores thirty seven lacs nineteen thousand one hundred and seventy only) |                                                                            |

**147.** In ***SRSR Holdings Pvt. Ltd. v. SEBI*** (Appeal No. 01/2019, decided on February 02, 2023), w.r.t. the joint and several liability of Noticees in a set of facts, Hon'ble Securities Appellate Tribunal held the following:

*“91. All persons who aid or direct or join in the committal of a wrongful act, are joint tort-feasors. To constitute a joint liability, the act complained of must be joint and not separate. Where two or more persons combine together to commit an act, it is a joint action which amounts to a tort. The liability of joint tort-feasors i.e. the liability that an individual or business either shares with other tort-feasor or bears individually without the others. Thus, joint tort-feasors are jointly and severally liable for the whole damage resulting from the tort. In assessing damages against joint tort-feasors or several tort-feasors causing same or indivisible damage, one set of damages will be fixed, and joint tort-feasors may be assessed according to the aggregate amount of the injury resulting from the common act or acts. The reason being is that where the cause of action is one and indivisible then all persons become liable jointly and severally.”*

**148.** In the facts of the present case, wherein, the Noticee No. 1 is the Mastermind of the manipulative/fraudulent scheme, and all other Noticees have played different roles in the scheme, they shall be held liable jointly and severally for impounding the unlawful gains made as per [Table 100](#) above. Given the aforesaid peculiar facts and circumstances of the case and legal principles



enunciated by Hon'ble SAT in a number of cases, I deem it appropriate to hold that *Noticees* shall be jointly and severally liable for the impounding of unlawful gains made by them as per the aforesaid Table.

## N. INTERIM ORDER

**149.** Thus, after analysing all evidences on record, I hold that this is a fit case to exercise powers of passing interim order so as to insulate the securities market and to protect the unlawful gains from being dissipated further, which may go beyond the regulatory reach. Accordingly, I, in exercise of the powers conferred upon me under sub-section (1) of section 11, sub-section (4) of section 11, sub-section (1) of section 11B read with section 19 of the SEBI Act read with regulation 11 of the PFUTP Regulations, hereby by way of the present interim order cum show cause notice, issue the following directions, which shall remain in force until further orders:

- i. An amount of **₹11,37,19,170/- (Rupees eleven crores thirty-seven lacs nineteen thousand one hundred and seventy only)**, being the total amount of unlawful gains earned from the alleged violations, shall be impounded, jointly and severally in the manner as provided in [Table 100](#) and *Noticees* are directed to open fixed deposit account(s) in a Scheduled Commercial Bank to credit/deposit jointly and severally the aforesaid amount of unlawful gains with a lien marked in favour of SEBI and the amount kept therein shall not be released without permission from SEBI.
- ii. *Noticee Nos. 1 to 3 and 5 to 12* are restrained from accessing the securities market and are further prohibited from buying, selling or otherwise dealing in securities, directly or indirectly. The *Noticee No. 4* is prohibited from buying, selling or otherwise dealing in securities, directly or indirectly, in its proprietary account.
- iii. The *Noticee No. 1* shall preserve the records of his various social media accounts maintained by him, directly or indirectly, till further directions.
- iv. Banks, where *Noticee Nos. 1 to 12* are holding bank accounts, are directed that no debits shall be made, without permission of SEBI, in respect of the bank accounts held jointly or severally by *Noticees*, except for the purposes



of transfer of funds to the fixed deposit account(s) as stipulated above. However, credits, if any, into the accounts may be allowed. Further, this direction shall not apply to those bank accounts of the *Noticee No. 4* which deal with clients' funds, since the *Noticee No. 4* is a stock broker registered with SEBI and deals with funds of clients.

- v. Depositories shall also be directed that no debit shall be made, without permission of SEBI, in respect of the demat accounts held by *Noticees*. However, credits, if any, into the accounts may be allowed. Further, this direction shall not apply to those demat accounts of the *Noticee No. 4* which deal with clients' securities, since the *Noticee No. 4* is a stock broker registered with SEBI and deals with securities of clients.
- vi. Banks and the Depositories are directed to ensure that all the aforesaid directions are strictly enforced and complied with. Further, debits in the bank accounts may also be allowed for amounts available in the account in excess of the amount to be impounded. Banks are allowed to debit the accounts for the purpose of complying with this Order.
- vii. The Registrar and Transfer Agents shall ensure that, they neither permit any transfer nor redemption of securities, including Mutual Funds units, held by *Noticees*.
- viii. *Noticees* shall not dispose of or alienate any of their assets/properties, till such time, the amount of unlawful gains is credited to fixed deposit account(s) except with the prior permission of SEBI.
- ix. *Noticees* are further directed to provide a full inventory of all their assets whether movable or immovable, or any interest or investment or charge in any of such assets, including property, details of all their bank accounts, demat accounts, holdings of shares/securities if held in physical form and mutual fund investments and details of companies in which they hold substantial or controlling interest immediately but not later than 15 days of this Order.
- x. The directions stipulated in clauses (ii), (iv), (v), (vi), (vii) and (viii) shall cease to apply upon crediting of the impounding amount to the fixed deposit account(s) as per clause (i).





- xi.** If the *Noticees* have any open position(s) in any exchange traded derivative contracts, as on the date of this Interim order, they can close out/square off such open positions within 3 months from the date of order or at the expiry of such contracts, whichever is earlier. The *Noticees* are permitted to settle the pay-in and pay-out obligations in respect of transactions, if any, which have taken place before the close of trading on the date of this order. Banks are allowed to debit the accounts for the purpose of complying with this direction

**150.** The *prima facie* observations/findings contained in this Interim Order are made on the basis of the material available on record. In light of the alleged violations of the provisions of the SEBI Act, 1992, PFUTP Regulations and the RA Regulations by *Noticees*, this Order shall be treated as a Show Cause Notice under sub-section (1) of section 11, sub-section (4) of section 11, sub-section (4A) of section 11, sub-section (1) and (2) of section 11B of the SEBI Act, 1992 read with regulation 11 of the PFUTP Regulations and read with SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 2005, calling upon all the *Noticees* to show cause as to why suitable directions shall not be passed against them, including directions as proposed hereunder:

- i. Direction to disgorge an amount equivalent to the total gains made on account of alleged fraudulent and manipulative trades along with interest;
- ii. Direction to restrain them from accessing the securities market and prohibiting them from buying, selling or otherwise dealing in securities for an appropriate period;
- iii. Direction to restrain them from associating with any registered intermediary; and
- iv. Directions for imposition of penalty under sub-section (4A) of section 11 and sub-section (2) of section 11B read with section 15HA of the SEBI Act, 1992 against *Noticee Nos. 2 to 12*, and under sub-section (4A) of section 11 and sub-section (2) of section 11B read with section 15HA and 15EB of the SEBI Act, 1992 against *Noticee No. 1*.



- 151.** *Noticees* may file their replies to SEBI within 21 days from the date of receipt of this Order and avail an opportunity of personal hearing in the matter, if they so desire.
- 152.** This Order is without prejudice to any other action that SEBI may initiate under the securities laws, as deemed appropriate.
- 153.** This Order shall come into force with immediate effect and shall be in force till further Orders.
- 154.** A copy of this Order shall be forwarded to *Noticees*, Stock Exchanges, Depositories, Registrar and Share Transfer Agents and Banks to ensure necessary compliance;

**PLACE: MUMBAI**  
**DATE: JUNE 17, 2025**

**KAMLESH C. VARSHNEY**  
**WHOLE TIME MEMBER**  
**SECURITIES AND EXCHANGE BOARD OF INDIA**