

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA

ORDER

UNDER SECTIONS 11B AND 11(4) (b) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992 IN THE MATTER OF ALKA SECURITIES LIMITED

1. Securities and Exchange Board of India (hereinafter referred to as SEBI) observed spurt in the price and trading volumes in the shares of Alka Securities Limited (hereinafter referred to as the company) which is traded only at Bombay Stock Exchange Limited (hereinafter referred to as BSE). From the trade history of the shares of the company, it is noted that the shares were quoted in the range of Rs.18.30 to Rs. 23.00 during the period January 01, 2008 to July 28, 2008. The share price of the company reached its year (2008) high of Rs.35.05 on September 11, 2008 and gradually fell to the level of Rs.16.90 on November 24, 2008. Thereafter, the price of the shares experienced an increasing trend and reached Rs.31.90 on March 25, 2009.

2. The Surveillance systems in SEBI had detected several alerts relating to the large volume of off-market transfers in the shares of the company. Further examination revealed that, on many occasions promoters of the company were also involved in off market transfers and these shares were subsequently traded at BSE. Such trading activities were further examined by SEBI and BSE to determine whether the trading volumes and price rise were normal or the same was the result of any unfair trade practices. In view of the above, an immediate examination was carried out by SEBI into the dealing in the shares of the company for the period November 2008 to March 2009 (hereinafter referred to as

the **Relevant Period**). The preliminary findings are given in the following paragraphs.

A. THE COMPANY, ITS BUSINESS, BOARD OF DIRECTORS AND SHAREHOLDING PATTERN

3. The company was incorporated on May 20, 1994, under the Companies Act, 1956 and obtained certificate of commencement of business on May 31, 1994. The registered address of the company is 203, Anupam Building, Dadabhai Cross Road No.2, Andheri (West), Mumbai-400053, Maharashtra. The company had comeout with a public issue of 55,00,000 equity shares of Rs.10 each at par aggregating to Rs.550 lakh and was listed at BSE on July 21, 1997 with the name Alka Securities Limited. Out of this only Rs 2.19 crore were paid and Rs 3.31 crore remained unpaid till March 2003. The company is presently engaged in the business of Stock Broking having SEBI Registration Nos. - INB230629237/INF230629237 and is a member of National Stock Exchange of India Limited (hereinafter referred to as NSE).

4. The Board of Directors of the company as on November 01, 2008 was as follows:

Name	Position
Ms. Alka Pandey	Chairperson & Managing Director
Mr. Brijesh Kothari	Executive Director
Mr. Ashok Shukla	Non Executive Independent Director
Mr. Rajkumar Sharma	Non Executive Independent Director
Mr. Gopaldas Chaudhary	Non Executive Independent Director

There had been no change in the Board of Directors during the Relevant Period. Among above key officials, Ms. Alka Pandey is a promoter (as per disclosure at BSE) with substantial holding in the company of 2,55,17,576 shares (Face value Rs 2.00 Per Share), which constituted 53.19% of the equity capital of the company (as on March 31, 2009) as disclosed to BSE.

5. Details of shareholding of promoters and the major shareholders (having more than 1%) as per filings made by company with BSE are given in the table below:

Table 1

	Name	June 2008	September 2008	December 2008	March 2009
Promoters	Alka M Pandey	91,53,000	1,31,53,000	1,31,53,000	2,55,17,576
	Ravi Pandey	2,58,500	2,58,500	2,58,500	2,000
	Mahesh Kothari	93,47,000	93,47,000	93,47,000	500
	Anjuben Kothari	1,88,000	1,88,000	1,88,000	
	Brijesh Kothari	10,37,500	10,37,500	10,37,500	
	Dimple Kothari	2,70,500	2,70,500	2,70,500	
	Mahendra pandey	-	5,23,690	5,23,690	1,43,200
	Mahesh Kothari Share & Stock Brokers Private Limited.	11,83,989	11,83,989	11,83,989	2,98,903
	Mayuresh Esatate Agent	40,00,000	-	-	
	Total	2,54,38,489	2,59,62,179	2,59,62,179	2,59,62,179
	% of Holding	50.88	51.92	54.12	54.12
Shareholders with more than 1% of holding.	Vipul V Bhatt	5,34,763	5,27,391	-	
	Nilesh P Chauhan	5,15,250	5,15,250	5,15,250	5,15,250
	Alpha Graphic India Limited		8,63,380	-	
	Takeshi Marketing Private Limited		-	6,17,891	
	Shailesh H Doshi Broking Private Limited		-	6,15,000	
	Nilesh Fulchand Parmar		-	6,00,000	
	Ramesh Jain		-	5,00,000	
	SSJ Finance & Securities Limited				12,72,427
	Anand Rathi Fin Ser Limited				10,79,172
	Transparent Shares & Sec				7,16,365
	SIC Stocks & Services Private Limited				7,00,600
	Religare Securities				5,11,700

	Name	June 2008	September 2008	December 2008	March 2009
	Limited				
	Total	10,50,013	19,06,021	28,48,141	47,95,514
	% of Holding	2.10%	3.81%	5.94%	10.00%
	Public Shareholding less than 1%	2,35,11,498	2,21,31,800	1,91,59,680	1,72,12,307
	Public Shareholding less than 1% (% holding)	47.02%	44.26%	39.94%	35.88%
	Total Shareholding of company	5,00,00,000	5,00,00,000	4,79,70,000	4,79,70,000

From the shareholding pattern of the company, as at the quarter ended December 2008, it was observed that the total share capital of the company had decreased from 5,00,00,000 shares, (Rs 2 Face value) in September, 2008 to 4,79,70,000 shares in December, 2008. This reduction in the share capital was on account of forfeiture of 20,30,000 shares, as per the disclosure made on BSE . It was also observed that

- i. The promoter viz. Mayuresh Esatate Agent's holding of 40,00,000 shares, appeared only in the quarter ending June 2008 (as indicated in Table 1).
- ii. The holding of Mr. Mahesh Kothari (one of the promoters, as mentioned in Table 1) had reduced from 93,47,000 shares as at quarter ending December 2008 to 500 shares as at quarter ending March 2009.
- iii. Mr. Brijesh Kothari (another promoter, as indicated in Table 1) who is also the Executive Director of the company was holding 10,37,500 shares up to the quarter ending December 2008. However, he does not appear in the shareholding list of the company for the quarter ending March 2009.
- iv. It was also observed that Mr. Mahendra Pandey's (promoter of the company and its compliance officer) holding reduced from 5,23,690 shares as at quarter ending December 2008 to 1,43,200 shares as at quarter ending March 2009.

However, no disclosure of the dilution of holding of either Mayuresh Esatate Agent or Mr. Mahesh Kothari was made by the company as required under the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 (hereinafter referred to as the Takeover Regulations). No disclosure of the dilution of holding of Mr. Brijesh Kothari and Mr. Mahendra Pandey was made by the company as per the provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 (hereinafter referred to as the Insider Trading Regulations), in their capacity as key personnel of the company.

B. FINANCIAL PERFORMANCE OF THE COMPANY

6. The quarterly (June, September, December 2008 and March 2009) results filed by the company with BSE are given below:

Description	Quarter Ended (in Rs. Lakhs)				Year Ended (in Rs. Lakhs)	
	Mar-09	Dec-08	Sep-08	June-08	Mar-09	Mar-08
Total Income	189.10	118.50	131.80	190.50	630.00	627.10
Net Profit / Loss	75.00	18.60	34.80	79.80	215.00	202.20

For the year ending March 2009, the company reported a net profit of Rs.215 lakh as compared to the net profit of Rs.202.2 lakh for the year ending March 2008, indicating a marginal increase in the net profit.

C. MAJOR CORPORATE ANNOUNCEMENTS BY THE COMPANY

7. Major corporate announcements of the company during the **Relevant Period** are as follows:

Date of Announcement	Announcement
February 25, 2009	To split up the existing Equity shares of Rs 2/- into Shares of

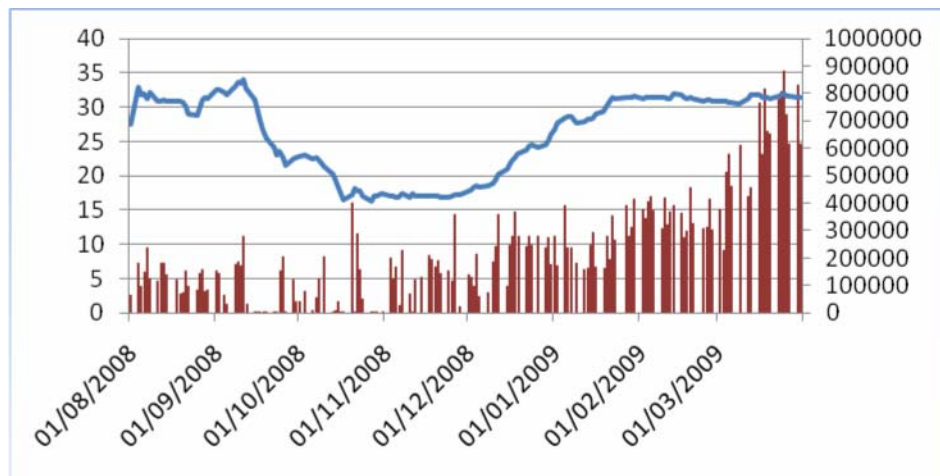
	Re.1/- each. Record date for this purpose was fixed as May 13, 2009
February 25, 2009	To issue further equity shares to the existing shareholders on rights basis
March 31, 2009	Accepted the resignation of Director Mr. Rajkumar Sharma and appointed Mr. Vinod S. Gupta as Additional Director of the Company, subject to the approval of NSE and SEBI

D. PRICE–VOLUME MOVEMENT IN THE SCRIP PRIOR AND DURING THE RELEVANT PERIOD

8. It was noticed that the scrip was relatively ill-liquid prior to January 2007. During the period, January 01, 2005 to December 31, 2006, shares of the company were traded on 288 days out of 501 trading days with an average daily volume of 9,433 shares on the days traded. The average traded volume during the period from January 2007 to December 2007 was 62,220 shares, an increase of 559% over the previous period (the increased volume is due to the stock split which has happened in the month of January, 2007). The daily average volume had further increased to 1.01 lakh shares from 62,220 shares in the earlier period (an increase of 61%) during the period January 2008 to October 2008, which further increased to 3.20 lakh shares (an increase of 216.8% over the previous period) during the Relevant Period. The shares had undergone a stock split on January 15, 2007 in the ratio of 1:5 resulting in the reduction of face value from Rs.10 to Rs.2. At the time of split the shares were traded below their par value (Rs.6.52 on January 12, 2007 for Rs.10 face value share). Post split price of shares dropped to Rs 1.36 (Rs 2 face value) on January 15, 2007, thereafter, the share price experienced an increasing trend and reached Rs. 35.05 on September 11, 2008 , an increase of 2500% over this period. Subsequently, the share price experienced a downward trend and dropped to Rs.16.55 on October 17, 2008 from Rs. 35.05 on September 11, 2008, a decrease of 52%. During the Relevant Period, the shares again gained momentum and reached the period

high of Rs. 31.95 on February 13, 2009. This price volume fluctuation is graphically depicted below:

PRICE AND VOLUME CHART FOR THE COMPANY



(Left hand axis- Price, Right hand axis – Volume)

9. It can be seen from the chart above, that the prices fell from August 2008 to October 2008 to reach close to half of the price prevailing in August 2008. It is also observed from the details provided by the company that one of the promoters, Ms. Alka Pandey, had kept a substantial number of her shares, as collateral for the loan taken by a related entity from Dena Bank, in her personal capacity as guarantor. In the month of October 2008, when Dena Bank had called for the loan amount, the promoters of the company had arranged the repayment of amount by taking loans from '212 entities' and arranged for the transfer of the shares held by Dena Bank (given by Ms. Alka Pandey as collateral) directly to '212 entities' in return. The price and volume of the shares of the company witnessed a considerable increase after this transfer of shares from Dena Bank. It is also observed that in the month of December, Ms. Alka Pandey had dematerialized 1.19 crore shares and transferred them to related entities (as further established in the report).

**E. ANALYSIS OF THE TRADING PATTERN AND OFF MARKET ACTIVITY
IN THE SHARES OF THE COMPANY DURING THE RELEVANT PERIOD:**

Concentration in the trading by stock brokers:

10. The stock brokers mentioned in the table below were found to be the top five stock brokers on buy and sell side of the trading:

Table 2

Buy stock broker	Qty	Conc.	Sell stock broker	Qty	Conc.
SSJ Finance	58,37,409	18.58%	Mahesh Kothari share & Stock	55,88,488	17.79%
Anand Rathi Financial	47,68,459	15.18%	PCS Sec	15,62,000	4.97%
Mahesh Kothari share & Stock	37,93,832	12.08%	Motilal Oswal	11,98,346	3.81%
SIC Stocks	34,99,215	11.14%	Eureka Stock & Shares	11,70,810	3.73%
Transparent shares and Sec	32,68,770	10.41%	ICICI Sec	11,40,175	3.63%
<i>Total of top 5 brokers</i>	<i>2,11,67,685</i>	<i>67.38%</i>	<i>Total of top 5 brokers</i>	<i>1,06,59,819</i>	<i>33.93%</i>
<i>Total shares Traded</i>	<i>3,14,14,054</i>	<i>100.00%</i>	<i>Total shares Traded</i>	<i>3,14,14,054</i>	<i>100.00%</i>

11. It is pertinent to observe that the stock broker Mahesh Kothari Share and Stock Brokers Limited had significant trading concentration both on the buy and sell sides. The said stock broker figured in the list of promoters of the company with a holding of 2.47% up to December 2008. Majority of the entities who received shares through off market transfers from promoters of the company had dealt through the aforesaid stock broker for on market transactions.

12. It is also observed that a client of Mahesh Kothari Share and Stock Brokers Limited named 'Alka Securities Limited', having the Permanent Account Number (PAN), AAACA4835E had bought 10,03,618 shares and sold 9,66,639 shares of the company at BSE during the Relevant Period. It is pertinent to note that the company also shared the same PAN i.e AAACA4835E. This appears to be *prima facie* violations that a listed company is involved in trading activity of its own shares.

Dealing in the shares of the company by the promoters, related entities of the company and entities connected to the promoters and the company:

13. It was observed that promoter entities transferred shares through off-market transactions to some entities (hereinafter referred to as **1st Level Entities**) who in turn transferred the said shares to another set of entities (hereinafter referred to as the **2nd Level Entities**) through off market deals. These 2nd level entities have subsequently dealt in the shares at BSE and 71.73% of these shares sold by 2nd level entities were bought back by 1st level entities which *prima facie* suggest circular trading activity in the shares of the company. By its very nature, off-market transactions are bilateral transactions carried out not on the anonymous trading screen of the exchange but generally through a middleman or between entities known to each other.

Further, keeping in mind the above, it appears that the 1st level entities are connected to the company/promoters. The grounds for such an inference are summarized below:

- i) Out of the total shares transferred by promoters to the 1st level entities through off market, entities who have received majority of the transfer have the same address as that of the company.

- ii) All the entities received shares through off market route from promoters almost around the same period, i.e, during November 2008 to March 2009.
- iii) These 1st level entities also transferred shares through off-market to the promoters, thereby enabling two way transfers through the off market between the 1st level entities and the promoters.

Prima facie, it further appears that the 2nd level entities are also indirectly connected to the company/promoters. The grounds for such a *prima facie* inference are summarized below:

- i) All these 2nd level entities have received large number of shares of the company through off market deals from 1st level entities and majority of the 2nd level entities have only executed sales transactions in the scrip.
- ii) Majority of the shares sold by 2nd level entities have been purchased by the 1st level entities themselves.
- iii) Considerable volume of off market transactions from 2nd level to 1st level entities were also observed
- iv) These off-market transfers between 1st and 2nd level entities do not appear to be normal sale/purchase transactions.

Based on above, *prima facie* it appears that the above entities are connected with the promoters or with the company. The 1st level entities also include those entities which share the same address as that of the company/promoters. Entities having transactions in the shares during the relevant period and *prima facie* not connected or not forming part of promoter, 1st level entities and 2nd level entities are grouped under "Others". The list of 1st level entities and 2nd level entities are **attached** as Annexure 'A' and Annexure 'B' to this order.

Off Market and On Market activity:

14. It was observed that, during the Relevant Period, the promoters had made off market transfers of sizable number of shares to the 1st level entities who in turn had transferred the shares to the 2nd level entities. The 2nd level entities thereafter, sold most of the shares (received from 1st level entities) in the securities market where the counterparties to the said trades to the extent of 77% were the 1st level entities themselves. Client-wise activity (including that of promoters) in off market as well as on market is mentioned in 'Annexure C' to this order. The total traded volume during the relevant period is 3,14,14,054 shares. The net movement of shares in off-market transactions amongst the promoters/related entities (1st and 2nd level entities) as well as in cash market is explained in the succeeding paragraphs

Dealing by Promoters:

15. During the Relevant Period, the six promoters, namely Ms. Alka Pandey (AGEPP1076H), M/s Mahesh Kothari Shares and Stock Brokers (AAACM3001E and AAACM3199H), Mr. Mahesh Natvarlal Kothari (AACPK2951Q), Mr. Brijesh Mahesh Kothari (AACPK8359C), Ms. Dimple M Kothari (AKBPK7311D) and Mr. Mahendra Pandey (AACPP5315K) either made inter-se transfers and/or transferred their shares to 1st level entities. The table below indicates all the transactions of promoters.

Table 3

	Promoters					
	Off Market			Cash Market		
	Received	Transferred	Net	Bought	Sold	Net
Promoters	1,82,46,339	1,82,46,339	0	0	0	0
1st level entities	38,15,184	1,22,45,718	-84,30,534	1,88,500**	93,135	95,365

2nd level entities	43,000	0	43,000	50,000	0	50,000
Others	37,700	0	37,700	10,000	14,665	-4,665
Total	2,21,42,223	3,04,92,057	-83,49,834	2,48,500	1,07,800	1,40,700

****Promoters Bought 1,88,500 shares from 1st level entities in Cash Market**

16. The major observations on dealings by **six promoter** entities are detailed below:

- a. Around 1.82 crore shares of the company were transferred through off market deals amongst the promoters which includes promoters transferring shares between their own different accounts. Reports under Regulation 3 (4) of the Takeover Regulations had not been filed for the inter-se transfer of shares between promoters.
- b. The promoters had transferred 0.84 crore shares (net) through off-market transactions to 1st level entities, which was 18% of the total share capital of the company (as on March 31, 2009). As stated earlier, requisite disclosures were not filed at BSE, as required under Regulation 7 of the Takeover Regulations and Regulation 13 of the Insider Trading Regulations.
- c. The shares which were transferred to Dena Bank as collateral by Ms. Alka Pandey (as stated above in this order) appeared to have been shown in promoter's holding, were transferred to 212 entities bringing down the promoter shareholding by 1.36 crore shares. This is a reduction of 53% of promoter holding from their declared shareholding at the end of September 2008. Despite this reduction of shareholding it appears that the company continued to disclose inflated promoter shareholding misleading the investors and hence is *prima facie*, in violation of Securities and Exchange Board of India

(Prohibition of Fraudulent and Unfair trade Practices Relating to Securities Market) Regulation 2003.

Dealing by 1st level entities:

17. The 1st level entities comprising 42 entities (listed in Annexure A) had received shares from promoters through off-market transfers. The table below shows all the transaction of 1st level entities:

Table 4

	1st level entities					
	Off Market			Cash Market		
	Received	Transferred	Net	Bought	Sold	Net
Promoter	1,22,45,718	38,15,184	84,30,534	93,135	1,88,500	-95,365
1st level entities	15,75,132	15,75,132	0	42,51,872	42,51,872	0
2nd level entities	1,93,000	1,64,66,320	-1,62,73,320	1,21,85,405	5,11,597	1,16,73,808
Others	1,12,30,707	12,34,250	99,96,457	40,51,158	18,04,044	22,47,114
Total	2,52,44,557	2,30,90,886	21,53,671	2,05,81,570	67,56,013	1,38,25,557

18. The major observations on dealings by the said 42 entities both off market as well as on market are detailed below:

- a) The concentration of 1st level entities in their gross buy to total shares traded during the period is 65.5% (2,05,81,570 shares of total trading of 3,14,14,054 shares) and in their gross sell to total shares traded during the period is 21.50% (67,56,013 shares of total trading of 3,14,14,054 shares). For 73.5% of the total shares traded, 1st level entities appear on either the buy or the sell side.
- b) Of the shares transferred to 2nd level entities through off-market transactions by 1st level entities, 71.73% had been repurchased by 1st level entities through cash market, i.e. net cash market purchase

- of 1,16,73,808 shares from 2nd level entities to total net off-market transfer of 1,62,73,320 shares by 1st level entities to 2nd level entities.
- c) The 1st level entities had bought 77% of the total shares sold by 2nd level entities in cash market (1,21,85,405 out of 1,58,22,277).
 - d) The 1st level entities had traded around 42.5 lakh shares amongst themselves in the cash market which is 13.5 % of the total traded volume in the scrip during the Relevant Period.
 - e) It was observed that six entities out of the 42 1st level entities, namely, JMDE Packaging and Realities Limited, Alpha Graphic India Limited, Takeshi Marketing Private Limited, Aster Mercantile Private Limited, Alka Securities Limited and Ashwini Trading Private Limited were major contributors in the activity of the 1st level entities. The salient features of their activity are as under:
 - i. All the six clients share the same address as that of the company, which apparently indicates the close nexus amongst the six clients with the company
 - ii. These clients (except Ashwini Trading Private Limited) had transferred close to 100% of the shares received by them through off-market transactions to 2nd level entities. Majority of these shares were also actually received by them through off-market transfers from the promoters of the company.
 - iii. As Ashwini Trading Private Limited had not received any shares from promoters off market, the various entities who have received shares from Ashwini Trading Private Limited are not included in the list of 2nd level entities. However the role of these entities needs to be further examined since Ashwini Trading Private Limited is also apparently related to the company.

- iv. Out of 65.55 % concentration by 1st Level entities on the buy side of total trading in the cash market, the above mentioned six clients had constituted 65.10% (2,04,51,570 shares to the total trading of 3,14,14,054 shares) i.e. the said six clients constituted 99.4% of the total purchase of the 1st level entities.
- v. Around 1 crore shares of the company were transferred through off-market from 'Others' to 1st level entities. This mainly includes the shares which were purchased by 1st level entities in cash market through the stock brokers namely, SIC Stocks & Services Limited, SSJ Finance and Securities Private Limited and Anand Rathi Financial Services. On seeking clarification for such off market transfers, these stock brokers replied that the said shares were kept with them due to nonpayment by the clients and later released as and when payments were made.
- vi. Dealings of the above mentioned six major 1st level entities are tabulated below:

Table 5

Client	Received (off market)	Transfer (off market)	Buy	Sell
Alka Securities Limited	20,000	20,000	10,53,618	9,66,639
JMDE Packaging & Realities Limited	70,42,843	70,78,513	73,13,937	36,113
Alpha Graphic India Limited	86,52,227	84,39,681	48,60,377	24,95,426
Takeshi Marketing Private Limited	36,93,873	36,32,377	40,25,753	29,646
Aster Mercantile Private Limited	2,17,500	2,13,734	4,62,480	21,41,689
Ashwini Trading Private Limited	7,99,089	21,77,996	27,35,405	-
Total	2,04,25,532	2,15,62,301	2,04,51,570	56,69,513

The inter-se trading of 42.5 lakh share by 1st level entities which constitutes 13.5% of total traded volume, *prima facie* suggests circular trading activity with a

possible intention of creating artificial volume so as to give the market a false impression about the liquidity of the scrip.

Dealing by 2nd level entities:

19. The 2nd level entities comprising 317 entities (listed in Annexure B) had received shares from 1st level entities. The table below indicates the collective activity of the 2nd level entities:

Table 6

	2nd level entities					
	Off Market			Cash Market		
	Received	Transferred	Net	Bought	Sold	Net
Promoter	0	43,000	-43,000	0	50,000	-50,000
1st level entities	1,64,66,320	1,93,000	1,62,73,320	5,11,597	1,21,85,405	-1,16,73,808
2nd level entities	3,15,015	3,15,015	0	6,86,775	6,86,775	0
Others	7,49,471	6,91,800	57,671	1,81,536	29,00,097	-27,18,561
Total	1,75,30,806	12,42,815	1,62,87,991	13,79,908	1,58,22,277	-1,44,42,369

20. The major observations on dealings by these 317 entities both off market as well as on market are detailed below:

- a) In the Cash Market the concentration of 2nd level entities in gross buy (Gross buy by 2nd level entities to total shares traded) is 4.39% (13,79,908 shares of the total trading of 3,14,14,054 shares) and in gross sale (Gross sell by 2nd level entities to total shares traded) is 50.36% (1,58,22,277 shares of the total trading of 3,14,14,054 shares) which *prima facie* suggests that the 2nd level of entities were used for offloading the shares in the market and their participation is 52.50% on either buy or sell side.

- b) 283 out of the said 317 (2nd level) entities had fully sold (or/and transferred) all the shares they had received through off market from the 1st level entities. As stated earlier most of the purchases from 2nd level entities were by the 1st level entities.
- c) Majority of the 2nd level entities had sold the shares in the cash market within 2-3 days of receipt from the 1st level entities through off market transactions.

Of the shares transferred to 2nd level entities in off market transaction by 1st level entities, 71.73% had been repurchased by 1st level entities through the cash market. Such trading activity by these promoter/company connected entities *prima facie* suggests circular trading activity with a possible intention of creating artificial volume so as to give the market a false impression about the liquidity of the scrip.

Overall observations on dealing by related entities:

- a) The price in the scrip had witnessed an increase from Rs.16.95 on November 03, 2008 to Rs. 31.24 on March 31, 2009, the daily volume also witnessed a steep surge from 94,000 shares (average during the period August 2008 to October 2008) to 3,20,551 shares (average during the Relevant Period).
- b) *Prima facie*, it appears that the one of the promoter of the company, Ms. Alka Pandey had offloaded 1.36 crore shares during the month of October and November 2008. These shares were kept by her as collateral with Dena Bank and the same were subsequently transferred by Dena Bank to 212 entities (some of them belong to the 2nd level entities). The company stated that the said 212 entities had

provided finance to the promoters to pay back the loan availed from Dena Bank.

- c) 84 lakh shares had been transferred by promoter through off market to related 1st level entities during the Relevant Period.
- d) The overall concentration of related entities in total traded volumes is mentioned in the table below:

Table 7

Buy	Sell	Percentage
Related entities	Related entities	57.19%
Related entities	Others	13.50%
Others	Related entities	15.02%
Others	Others	14.28%

(Related entities constitute Promoter, 1st level entities and 2nd level entities)

- e) The concentration of related entities trading among themselves was 57.19% (1,79,67,284 shares of total trading of 3,14,14,054) of the total trading.
- f) The contribution of the related entities where they were on any one side of the trade was 85.72% to the total trades during the **Relevant Period**.
- g) The concentration of trades of clients where both the parties to trade were neither a promoter nor a 1st/2nd level entity was only 14.28% (44,85,270 shares of shares of total trading of 3,14,14,054). This *prima facie* demonstrates that the trading in the scrip was propped up substantially by circular trading among related entities. This also gives rise to the *prima facie* inference that the two intermediaries involved namely, Alka Securities Limited and Mahesh Kothari Shares and Stock Brokers Limited could have masterminded this scheme of manipulation.

- h) The details of the trading by the related entities are mentioned in the table below. A concentration of 71% on the buy side and 72% on the sell side is observed during the Relevant Period.

	Buy	Sell
1 st level Entities	2,05,81,570	67,56,013
2 nd level Entities	13,79,908	1,58,22,277
Promoter	2,48,500	1,07,800
Related Entities	2,22,09,978	2,26,86,090
% of Total	70.70%	72.21%
Total	31414,054	3,14,14,054

Analysis of trades having impact on the price of the scrip:

21. It was observed that the share price of the company had increased from Rs.16.95 on November 03, 2008 to Rs.31.45 on March 31, 2009, an increase of 86% (closing price of November 03, 2008 to closing price of March 31, 2009) in five months. It has been observed that the net increase in price from November 03, 2008 (opening price) to March 31, 2009 (last traded price) was Rs.14.00. There were 1,342 instances of price increase noticed during the **Relevant Period**, wherein the prices quoted were at a higher level than the previous traded price. There were also 1,411 instances where price were quoted at a lower level than the previous traded price (It may be noted that for the first trade of the day, the difference is calculated using last trade of the previous day and not the closing price for previous day). To better appreciate the contribution of the various entities to the price increase or decrease as the case may be, the sum of the incremental increases across the 1,342 instances and the sum of the incremental decreases across the 1,411 instances were computed. A total of 166 clients had contributed to the cumulative sum of all the increases in price of Rs.91.70. So also, a total of 137 clients had contributed to the cumulative sum of

all the decreases in price of Rs.77.70. Of the total increase of Rs.91.70, the top four contributors were 1st level entities with a total contribution of Rs 36.95 comprising 40% of the sum of all price increases. The contribution by each entity is mentioned in the table below:

Table 8 - Contribution in cumulative Price Increase

Entities	Individual Contribution (in Rs)
JMDE Packaging & Realties Limited	14.30
Alpha Graphic India Limited	10.30
Takeshi Marketing Private Limited	7.35
Ashwini Trading Private Limited,	5.00
Total for four entities	36.95
As % of total price Rise	40.30%
Total Cumulative Price Rise	91.70

It is also observed that one of the 1st level entities, Aster Mercantile Private Limited who sold a net of 17 lakh shares, had contributed to the reduction in the share price by Rs.29.00, which was 37.3% of the total decrease. This *prima facie* reveals a directed and preplanned design on the part of those who had perpetrated the manipulation described above.

Misleading declaration of shareholding:

22. Analysis of the beneficial owner accounts of the promoters in the depository system further revealed that the shareholding pattern disclosed by the company to BSE and the actual shareholding of the promoters is significantly different. Despite, the actual reduction in the promoter shareholding, *prima facie* the promoters had made an attempt to mislead the shareholders and investors by making inflated and palpably incorrect disclosures to BSE. The details of actual holding vis-à-vis disclosed shareholding are given below:

Table 9

Promoters	As on December 31, 2008		As on March 31, 2009	
	Actual	Disclosed	Actual	Disclosed
Ms. Alka Pandey	52,05,445	1,31,53,000	62,15,445	2,55,17,576
M/s Mahesh Kothari Shares and Stock	75,16,997	11,83,989	1,98,903	2,98,903
Mr. Mahendra Pandey	0	5,23,690	1,40,700	1,43,200
Mr. Mahesh Natwarlal Kothari	0	93,47,000	0	500
Mr. Brijesh Kothari	195	10,37,500	195	
Ms. Dimple Kothari	0	2,70,500		
Total	1,27,22,637	2,55,15,679	65,55,243	2,59,60,179

The company had reported that Ms. Alka Pandey had pledged 1,92,99,631 shares on March 20, 2009, but the disclosure for the same was made by the company to BSE only on May 15, 2009. However, the demat statements of Ms. Alka Pandey showed a holding of only 37,40,445 shares as on March 20, 2009. The procedure for pledging of demat shares is clearly laid down within the bye-laws of the Depositories framed under the Depositories Act, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996. The requirement therein is that shares pledged have to be identified separately as 'pledged' shares. However, no such 'pledge' was seen identified in the demat statement of Ms. Alka Pandey, and this therefore *prima facie* indicates that the disclosures made by the company to BSE are incorrect.

PRIMA-FACIE VIOLATIONS BY PROMOTERS/KEY OFFICIALS RELATING TO THE DISCLOSURES:

23. Analysis of shareholding as disclosed in the shareholding pattern to BSE and the actual holding by the promoters and directors of the company in the depository system *prima facie* suggests following violations of SEBI Regulations:

Name of the Entity/Person	<i>Prima Facie</i> violation of SEBI Regulations
Mayuresh Esatate Agent	As per shareholding pattern disclosed by the company,

(Promoter)	Mayuresh Esatate Agent's holding has reduced from 40,00,000 shares in the quarter ending June 08 to 'nil' in the quarter ending September 2008. However, no disclosures in this regard were made as required under the Takeover Regulations and the Insider Trading Regulations.
Mr. Brijesh Kothari (Promoter and Executive Director)	Brijesh Kothari, who was holding 1,33,695 shares at the quarter ending September 2008 had transferred 1,33,500 shares to Mahesh Kothari Shares & Stock Brokers Limited on November 05, 2008. However, no disclosures in this regard, as required under the Insider Trading Regulations, were made.
Mr. Mahendra Pandey (Promoter and Compliance Officer)	Mahendra Pandey, who was holding 5,23,690 shares for the quarter ending September 2008, had transferred 3,00,000 shares to Mahesh Kothari Shares & Stock Brokers Limited, 41,000 shares to Roshini Pandey and 1,82,690 shares again to Mahesh Kothari Shares & Stock Brokers Limited in three different occasion during October 2008. However, the required disclosures for the above transfers were not made, as required under the Insider Trading Regulations.
Mr. Mahesh Natvarlal Kothari (Promoter)	As per disclosure by company Mahesh Natvarlal Kothari's holding has reduced from 93,47,000 shares as on December 31, 2008 to 500 shares as on March 31, 2009. However, no disclosures in this regard were made as required under the Takeover Regulations and the Insider Trading Regulations
Ms. Alka M Pandey (Promoter, Chairperson and Managing Director)	Alka M Pandey was observed to have transferred/received 25,000 shares or more on 13 occasions during the period November 2008 to March 2009. However, no disclosures were made in this regard as required under the Insider Trading Regulations.

SUMMARY OF PRELIMINARY FINDINGS:

24. The preliminary analysis into the dealing in the shares of the company *prima facie* suggests that:

- a) The promoters used the off-market route to transfer the shares of the company to 1st level entities which had either dealt in these shares on BSE or transferred them to numerous 2nd level entities through the off-

market route. The 2nd level entities had in turn dealt in the said shares at BSE. The trading activity by the promoter/company connected entities suggests circular trading activity with an intention of creating the volume so as to give the market a false impression about the liquidity of the scrip. The activities of the aforesaid entities are an attempt to attract unsuspecting investors to deal in the scrip. The related motive of maintaining trading price at artificial levels may arise from the fact that 74 % of promoter shares were pledged against loans. The promoters and entities (1st level and 2nd level entities) connected to the promoters and company appear to have violated the provisions of Regulation 3 and 4 of the Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations 2003.

- b) The company, its promoters and directors, appear to have violated the provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 and Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 by failing to provide mandatory disclosures for change in their shareholdings on various occasions.
- c) The mandatory quarterly disclosures of shareholding pattern to the public through the disclosures made to BSE were incorrect and apparently false. By misreporting of price sensitive information they have sent misleading signals to the market since the promoters' holding was shown to remain unchanged over the Relevant Period. *Prima facie* this violates the Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market), Regulation, 2003 and Clause 35 of the Listing Agreement.

25. The preliminary findings discussed above clearly show that the entities (Promoter, 1st level entities and 2nd level entities), jointly and severally, have *prima facie* violated the Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations, 2003, Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation 1992, Listing Agreement and Securities and Exchange Board of India (Acquisition of Shares and Takeovers) Regulations, 1997. SEBI has initiated formal investigations into the matter. However, to ensure that these entities do not cause any further damage or loss to investors and do not breach the integrity of the market, I find it imperative to issue an interim order at this stage.

26. The table below mentions the buy, sell of the related entities and others. As seen in the table below the average daily traded volume by “others” has increased over the months of the **Relevant Period**, indicating possibly a heightened investor interest in this scrip.

Table 10

Month	Buy		Av Daily traded volume by "Others"	Sell		Av Daily traded volume by "Others"
	Related entity	Others		Related entity	Others	
November	1,366,656	1,240,506	68,917	1,777,070	830,092	46,116
December	2,694,115	1,800,869	85,756	3,063,366	1,431,618	68,172
January	3,208,903	1,956,536	97,827	3,407,034	1,758,405	87,920
February	5,853,712	925,702	48,721	4,788,576	1,990,838	104,781
March	9,086,592	3,280,463	164,023	9,650,044	2,717,011	135,851
Total	22,209,978	9,204,076		22,686,090	8,727,964	

During the period the average daily traded volume of ‘others’ has increased from 46000 shares to 1.36 lakh shares on the sell side and similarly on the buy side

the average daily traded volume went up to 1.64 lakh shares in March as compared to 69,000 shares in November 2008. This clearly suggests that the dealings by the promoters and the connected entities have induced genuine investors to deal in the shares, oblivious to what *prima facie* appears to be an artifice that the above mentioned entities had designed and executed.

27. Considering the persistent wrong and misleading disclosures of its shareholding pattern by the company, it is difficult to compute precisely the actual offloading of shares by the promoters and the related entities to such investors. Further due to the incorrect disclosures the trading by a growing number of investors is based on *prima facie* false and deceitful information originating from the company.

28. It was observed that the 1st level and 2nd level entities in the period i.e. from April 2009 to June 2009 (June 16, 2009) immediately following the relevant period have 65% (approx) concentration both on buy as well as sell side suggesting that these entities have continued to deal in the shares of the company beyond the Relevant Period, apparently in the manner discussed above. The price of the shares of the company has remained steady at an average price of Rs 16.74 (adjusted after a stock split of ratio 1:2). The scheme outlined above designed by the promoters around a pattern of trading through concentric rings of the 1st and 2nd level related entities *prima facie* leads to a strong inference that it could well be the ingredient of a possible exit strategy wherein shares are sold to genuine investors at prices that have been artificially maintained through sustained circular trading, as has been described above. The urgency to intervene on behalf of genuine shareholders and investors is therefore compelling. SEBI would be seen as failing in its duty if it were not to bring to book a registered intermediary that has disregarded with impunity its larger duties to its shareholders and its obligations to maintain market integrity.

29. In view of the peculiar scheme *prima facie* adopted by the company/its promoters/ other entities as revealed in the preliminary findings, the only responsible course of action to SEBI is to intervene to prevent the aforesaid entities from causing further damage to the securities market and possible loss to the investors through immediate regulatory intervention. If such devious practices are left unchecked, the same would undermine the confidence of investors in the integrity of the market and the trading systems. There is therefore an imperative need to pass the present *ex-parte* interim order to protect the securities market and the investors at large. Further, if the entities are allowed to operate in the securities market any more, the same would be fraught with immense danger and could potentially cause incalculable damage to the securities market and genuine investors who repose their faith in the credibility and integrity of market mechanisms.

30. Therefore, with a view to protect the interest of investors and securities market from further such acts, I, in exercise of the powers conferred upon me under Section 19 of the Securities and Exchange Board of India Act, 1992 read with Sections 11B and 11(4)(b) thereof, pending investigation, hereby issue the following directions, by way of ad interim *ex-parte* order -

- a) The promoters of Alka Securities Limited viz. Ms. Alka M Pandey (Permanent Account Number-AGEPP1076H), Mr. Ravi Pandey (Permanent Account Number AGOPP9246R), Mr. Mahesh Natvarlal Kothari (Permanent Account Number AACPK2951Q), Ms. Anjuben Kothari (Permanent Account Number ALRTK7038C), Mr. Brijesh Kothari (Permanent Account Number AACPK8359C), Ms. Dimple Kothari (Permanent Account Number AKBPK7311D), Mr. Mahendra Pandey (Permanent Account Number AACPP5315K) and Mayuresh Esatate

Agent are restrained from accessing the securities market and further prohibited from buying, selling, dealing in securities in any manner whatsoever, until further orders.

- b) Alka Securities Limited is further directed not to issue any equity shares or any other instrument convertible into equity shares, in any manner, and shall not alter its capital structure in any manner, till further directions in this regard.
- c) The stock brokers, Alka Securities Limited (Permanent Account Number AAACA4835E) and Mahesh Kothari Shares & Stock Brokers Limited (Permanent Account Numbers - AAACM3001E and AAACM3199H) are hereby prohibited from buying, selling or dealing in any securities on their respective proprietary/ own account, until further orders.
- d) The stock brokers, Alka Securities Limited and Mahesh Kothari Shares & Stock Brokers Limited are hereby directed not to take fresh clients with immediate effect until further orders.
- e) All the 1st level entities and 2nd level entities mentioned in the tables below are hereby directed not to buy, sell or deal in the securities of Alka Securities Limited in any manner, till further directions in this regard.

1ST LEVEL ENTITIES		
S. NO.	NAME	PERMANENT ACCOUNT NUMBER
1	Alka Securities Limited	AAACA4835E
2	Fairwealth Securities Private Limited	AAACF8795N
3	Ramsons Castings Private Limited	AAACR9195E
4	JMDE Packaging & Realities Limited J P & R Limited	AAACU1995M

5	Kundanmal R Jain	AAAHK1020J
6	Kamlesh Baheti	AAAHK6978H
7	Laxmilal P Kabra	AA AHL6386G
8	Vikas Vatsal Garg	AAAHV8230K
9	Ketan Hasmukhbhai Doshi	AAAPD8373R
10	Alpha Graphic India Limited	AABCA8299H
11	Balubhai Manjibhai Gajipara	AABHB5738D
12	Piyush Prafulchandra Avlani	AABPA1996N
13	Takeshi Marketing Private Limited	AACCT4428L
14	Ramswarup S Sarda	AACHS7099R
15	Virendra Pandey	AACPP5316L
16	J.Balraman	AADHJ6453K
17	Aster Mercantile Private Limited	AAECA7369M
18	Sailesh H. Doshi Broking Private Limited Sailesh H. Doshi Bro	AAECS7404H
19	Balmukund Baheti	AAEHB8435N
20	Deepak Chopra (HUF)	AAEHD7308A
21	Mukeshkumar Shankarlalji Mandowara	AAEHM1705Q
22	S K Nangalia and sons (HUF)	AAIHS0115G
23	Rakesh K Jain (HUF)	AAJHR9790R
24	Veena S Jaisingh	AAJPJ6513G
25	Sureshchandra Goyal	AAOHS2706M
26	Gyanchand Jain	AASPJ4832D
27	Dhiraj Ghai	AAVPG4321P
28	Suraj K Nangalia	ACAPN0914A
29	Mitesh J. Jani	ACNPJ6429M
30	Sunil Kumar Jain	ADNPJ1497J

31	Sushil Kumar Jain	ADNPJ1498H
32	Vimla Kanhaiyalal Jain	AFCPJ1691K
33	Sheetal Suresh Goyal	AFEPG7111B
34	Sureshchadra Rameshwar Goyal	AFRPG7299B
35	Arun Kumar Goyal	AGBPG9517F
36	Megha Goyal	AGBPM7345M
37	Lokendra Rameshchunilal Mantri	AHFPM4945G
38	Sumit Sureshchandra Goyal	AJBPG9494J
39	Vinayak Baliram Godambe	AKWPG1578M
40	Roshini Sushil Pandey	ANOPP8597Q
41	Virendra S Pandey	APZPP8875L
42	Ashwini Trading Private Limited	AADCA9353N

2ND LEVEL ENTITIES

S.NO.	NAME	PERMANENT ACCOUNT NUMBER
1	Kunj Saurin Shah	BQBPS8034C
2	Yojana Sakhare	BPQPS6667R
3	Yasmeen Abdul Rehman	BLFPS5754Q
4	Fatima Abdul Razak Shirva	BJZPS7769F
5	Asrin M. Hanif Shirva	BJZPS7768E
6	Khadeeja S. Hamid Shirva	BJZPS7625G
7	Prajakta Shinde	BGFPS9869H
8	Deepali Kothari	BFDPK8567D
9	Ritaben P Sanghvi	BDAPS9921G
10	Sachin P Sanghvi	BAEPS1536E

11	Darshan P Sanghvi	BAEPS1535H
12	Jasvinder Kaur Sachdeva	AZPPS9626Q
13	Nirav Hiren Mewada	AYAPM7580K
14	Nilaben Nitinbhai Shah	ATTPS1393Q
15	Madhu Shah	ARUPS5096F
16	Lalita Mahendrakumar Shah	ARRPS0077M
17	Kusum Sharma	APQPS5086K
18	Asif Mohd Iliyas Shaikh	APGPS8577P
19	Harmeet Singh Bhasin	ANZPB1452D
20	Kaushik Hardasbhai Patodiya	ANXPP8947P
21	Rupal Ashish Savla	ANVPS5240E
22	Monika Mehul Kesaria	ANRPK4123E
23	Neeta R Patel	ANMPP3819K
24	Aruna Vilas Soman	ANEPS4783M
25	Manorma Kunwar	ANEPK6937D
26	Raghuram Kanyan Shetty	AMWPS0596B
27	Ahsan Mohd Iliyas Shaikh	AMPPS9653L
28	Sumeet Subhash Bhoir	AMNPB9491R
29	Nareshkumar Maheshkumar Sajnani	AMMPS1396K
30	Chetna Ramji Gangar	AMMPG4965C
31	Prabhjot Singh Bhasin	AMMPB0480F
32	Shah Ramila Jayantilal	AMIPS9108D
33	Ashish Dulani	AMBPD8965E
34	K V R Prasad	ALEPP7794B
35	Vaishali Sharad Gawde	AKZPG4168Q

36	Ajay Saraf	AKYPS6638Q
37	Rachit Agrawal	AKXPA7947D
38	Parvati Ben Patel	AKPPP1148P
39	Vijaya Ben Patel	AKPPP1147C
40	Rashmi Ben Patel	AKPPP1146D
41	Ankit Shashikant Kansara	AKPPK4485L
42	Richa Jaiswal	AKFPJ0623D
43	Bachubhai Bhuralal Patel	AKAPP1879N
44	G Kamal	AJZPK6932H
45	Meenaben G Patel	AJWPP2146F
46	Sachin Babasaheb Deshmukh	AJSPD3435F
47	Sheela Babasaheb Deshmukh	AJSPD3434E
48	Aditya Pathak	AJRPP7868D
49	Gitaben Shashikant Shah	AJKPS9683C
50	Trilochan Singh Suchdev	AJGPS9694B
51	Aditya Patel	AJGPP7663P
52	Kinjal Ramanik Dawada	AJEPD3612L
53	Pushpalatha .	AJCPP9790R
54	Nitin Deshmukh	AIOPD3929K
55	Yogita Mahesh Sajnani	AINPS8408F
56	Dharaben Miteshbhai Shah	AINPS8200K
57	Pankajkumar Mishrimal Sanghvi	AINPS4041C
58	Kushal Surendra Mangal	AILPM3396A
59	Anand Mangal	AIJPM8446P
60	Saroj Sayani	AIIPS6271P

61	Nahid Ejazahmed Ansari	AIBPA3358E
62	Rashna K Bulsara	AIAPB8713B
63	Vashantiben Chandulal Shah	AHXPS3318R
64	Deepesh Agarwal	AHJPA1042N
65	Saloni Agarwal	AHJPA1036G
66	Shashikant Natvarlal Shah	AHFPS0201H
67	Patel Shardaben Amrutlal	AHFPP7657J
68	Sehrunnisa Abdul Q Khan	AHBPK6146P
69	Devyani Manjit Kumar Patel	AGWPP5791M
70	Surbhi Chopra	AGWPC8809K
71	Kiran Jain	AGRPJ8263F
72	Dhaval Rajesh Gorasia	AGQPG9683F
73	Vinod Bhogilal Shah	AGNPS4841E
74	Devendra Vinod Shah	AGNPS4840F
75	Ashok Lalchand Shah	AGMPS0253K
76	Patel Anita Pareshbhai	AGMPP0843N
77	Sheela Devi Mahawar	AGKPM2350B
78	Ratnamala Subhash Bhoir	AGJPB9144K
79	Subhash Ganu Bhoir	AGJPB9142R
80	Pooja Jhalani	AGBPJ2064L
81	Indiraben Laherchand Mehta	AGAPM6053H
82	Uma Yogendra Ashtekar	AFVPA7141Q
83	Nilamben Babulal Sanghvi	AFNPS9256A
84	Rahul R Jain	AFNPJ4009A
85	Nilesh Ranka	AFMPR9365N

86	Tarachand Jain (HUF)	AFMPM3339M
87	Sangeetha Jain	AFKPJ3114P
88	Abdul Quddus Khan	AFJPK2769J
89	Sandhya Agrawal	AFIPA3683G
90	Ramkaran Agrawal	AFIPA3681E
91	Sunil Kumar Agrawal	AFIPA3580J
92	Sumitra Chopra	AFHPS5880C
93	Manish Gupta	AFHPG4246A
94	Binita Sunilkumar Kamalia	AFFPK8512H
95	Megha Gupta	AFFPA5743L
96	Jadeja Kumar Mahendrasinh	AFDPJ3859A
97	Salomy Jacob	AFAPJ2127C
98	Rachana Chhaparia	AFAPC5297A
99	Varun Jain	AEZPJ3027M
100	G Kanchan Jain	AEYPK5942F
101	Prem Kumar Kakkar	AEYPK1378K
102	Chorge Pandurang Appa	AEYPC8035M
103	Piyush Chopra	AEXPC0055J
104	Rajni Kothari	AEVPK0520N
105	Vatsal S Vora	AEUPV3374C
106	Tanika Ravindra Jalan	AEUPJ9610H
107	Laxmi Patel	AESPP3594E
108	Jagdish Patel	AESPP3593D
109	Bhanumati Patel	AESPP3426P
110	Hemlata Patel	AESPP3402P

111	Shiromani Jain	AESPJ9821Q
112	Shefali Dikul Shah	AEQPS9087R
113	Raj Kumari Gupta	AEOPG5752M
114	Vinay Kumar Agarwal	AEMPK0188B
115	Divya Gupta	AEMPG5825R
116	Nimesh Surendrakumar Bhavsar	AEMPB1809G
117	Kamlesh Surendra Mangal	AEKPM3180R
118	Ashwani Kumar Gupta	AEIPG1359L
119	Madhu Gupta	AEGPG5088J
120	Nawal Kishore Soni	AEFPK5133H
121	Nandkishor Dattatray Sakhare	AEEPS3558K
122	Prashant Agarwal	AEEPA0496C
123	Prem Kumar Sharma	ADZPS0801K
124	Deepak Umedchand Mehta	ADZPM2112P
125	Rekha Parasmal Parmar	ADXPP3153F
126	Ritu Chopra	ADVJP1309H
127	Kishan Gopal Mahawar	ADTPM2663H
128	Babulal Mishrimal Sanghvi	ADRPS3261K
129	Sunil Kumar Kamalia	ADQPK8419E
130	Shanti Devi	ADQPD1519A
131	Kamod Devi Bachhawat	ADQPB6995C
132	Kalpana Jain	ADNPJ8232B
133	Garima Jain	ADNPJ3794Q
134	Ekta Jain	ADNPJ1411E
135	Gauriben Narendra Patel	ADLPP5395B

136	Vinod Kumar Navkar	ADLPN9668D
137	Shakuntala Vijaykumar Shinde	ADGPS9938J
138	Bharathi Devi	ADFPD3395P
139	Manish Pyarchand Jain	ADEPJ8351L
140	Nandita Goyal	ADEPG7628M
141	Maneesha Agarwal	ADBPA4571E
142	Nitin Kumar Gupta	ADAPG2090D
143	Rajeev Chopra	ACWPC0302M
144	Mukul Agarwal	ACWPA6156D
145	Kamal Chandra Agarwal	ACWPA2659M
146	Mahesh Tilumal Sajnani	ACVPS6579H
147	Vandanaben Deepakbhai Mehta	ACUPM6669B
148	Neetu Jain	ACUPJ0651N
149	Dikul Mahendrakumar Shah	ACTPS7330L
150	Patel Bhavesh Babubhai	ACSPP8982A
151	Paresh Babubhai Patel	ACRPP9789J
152	Manish Kumar Agarwal	ACRPA8001E
153	Sachin Jha	ACMPJ3775B
154	Musaji Ibrahim Balesaria	ACMPB8350L
155	Iliyas	ACMPB8349M
156	Mohamad Arif Ibrahim Balesaria	ACMPB8344G
157	Ataul Usmangani Memon	ACLPM6801A
158	Om Jain	ACJPJ0231F
159	Indira Jain	ACIPT1312L
160	Narendra Shivganbhai Patel	ACIPP9283E

161	Santosh Kumar Jain	ACIPJ0790Q
162	Premlata Devi Chhapadiya	ACIPC0675P
163	Tejmal Jain	ACHPJ5196M
164	Navin Kumar Jain	ACHPJ5194K
165	Vimal Kumar Jain	ACHPJ5193Q
166	Sarla Jain	ACHPJ5192R
167	Anju Devi Agarwal	ACHPA6756E
168	Rajwanti Gupta	ACGPG2270C
169	Murari Bajaj	ACGPB5221Q
170	Laherchand Umedchand Mehta	ACFPM2818M
171	Machani Shiva Prasad	ACEPP3107B
172	Surendra Nath Tripathi	ACDPT8173G
173	Piyush Jayantilal Malde	ACDPM8876H
174	Chetan Chopra	ACDPC9263C
175	Saroj Bajaj	ACCPB9661N
176	Pramila K. Seth	ACAPS6157N
177	Champa Devi Chopra	ACAPC8016A
178	Sajjan Chopra	ACAPC8015D
179	Chanchal Devi Chopra	ABYPC1654R
180	Suwa Devi Chopra	ABYPC1653J
181	Kamlesh Prakash	ABVPP0701H
182	Lalitha J	ABVPL5168L
183	Shakuntala Devi Jhalani	ABUPJ0312R
184	Sohan Lal Jhalani	ABUPJ0262A
185	Seetharam Baldeva	ABTPB5317K

186	Hemaxiben Rajeshbhai Gorasia	ABSPG1769P
187	Rajeshbhai Prabhudasbhai Gorasia	ABSPG1768N
188	Poonam Gupta	ABRPG2342K
189	Gora Bai	ABRPB5274B
190	Praveen M Jain	ABQPJ4771Q
191	Mangilal Jain	ABQPJ4769A
192	Sudhinderkumar	ABNPS0846A
193	Taraben S Parikh	ABNPP5386N
194	Kanta Lahoti	ABNPL7061L
195	Mukesh Kumar Jain	ABNPJ3627L
196	Ashish Kumar Chhapadiya	ABMPC4542L
197	Manish Kumar Chhapadiya	ABMPC4541K
198	Pawan Kumar Chhapadiya	ABMPC4540J
199	Babulal Bhansali	ABMPB6776F
200	Anandba Mahendrasinh Jadeja	ABLPPJ1921H
201	Jadeja Devendraba Rajendrasinh	ABLPPJ1917H
202	Rajesh Gupta	ABLPG8623M
203	Nathmal Ramesh Kumar	ABKPR0083M
204	Ramesh Chand	ABKPR0075R
205	Betullakhan Asdullakhan Pathan	ABKPB6908R
206	Vishakha Ramesh Bhakare	ABJPB7590A
207	Shafali Bindesh Shah	ABIPS9335B
208	Bindesh Mahendra Shah	ABIPS3612H
209	Radheshyam Jaju	ABIPJ0739L
210	Archana Parekh	ABFPP0259E

211	Maya Jha	ABFPJ0945H
212	Harapanahalli Chandrasekar	ABDPC3035B
213	Dinesh Bhikhabhai Ghevariya	ABCPG0638B
214	Omprakash Jajoo	ABBPJ8583D
215	Ghanshyam Jajoo	ABBPJ8558Q
216	Mohan Lal Lahoti	ABAPL6200G
217	Hemangini Satish Shah	AAZPS7309H
218	Hareesh Kumar Babulal	AAZPH6571L
219	Shabana Lalani	AAXPL8934H
220	Shree Niwas Lahoti	AAXPL1552D
221	Kamal Kishor Lahoti	AAWPL4211A
222	Shanti Lal Lunkad	AAWPL0464H
223	Rajendra Kumar Lunkad	AAWPL0463A
224	Surya Devi Lunkad	AAWPL0462B
225	Neeraj Kumar Lunkad	AAWPL0459J
226	Preeti Lunkad	AAWPL0458K
227	Har Prasad Jaiswal	AAWPJ2777M
228	Sudha Dattatray Ashtekar	AAWPA8894L
229	Kamla Kanungo	AAVPK6244R
230	Vikita S Kansara	AAUPK0416A
231	Teeja Devi	AASPT2488B
232	Ramesh Maruti Bhekare	AAQPB4088H
233	Nisarahmed Mohmadyusuf Ansari	AAQPA3488C
234	Bhawna Dulani	AAPPD3971J
235	Mukesh Chopra	AAPPC9599P

236	Rekha S Chopra	AAPPC9598N
237	Rekha R Chopra	AAPPC9597D
238	Kamlesh Kumar M	AAOPK0619B
239	Khursheed Merchant	AANPM6069Q
240	Madhu Bhansali	AANPB2492A
241	Satish Devichand Shah	AAMHS9911E
242	Vijay Dolandas Makhija	AALPM8960E
243	Geeta Pankajkumar Jain	AAKPV1459L
244	Shantilal Lunker	AAKHS3350M
245	Rajesh Nemchand Shah	AAKHR1620K
246	Ravindra Jalan	AAJHR3464G
247	Anil Shantilal Patel (HUF)	AAJHA3477L
248	Satish Chopra	AAIPC6212E
249	Sangeeta Chopra	AAIPC6211H
250	Rajendra Chopra	AAIPC1036C
251	Rajesh Mehta	AAIHR3010D
252	Rajesh Dantewadia	AAHHR8390B
253	P M Sanghvi (HUF)	AAHHP3138D
254	Kirit Ratilal Shah (HUF)	AAHHK6820R
255	Anand S Mashruwala	AAGPM0003P
256	Samir Lalani	AAGPL5776N
257	Satish Chopra-Karta (Satish Chopra HUF)	AAGHS0986P
258	Ramesh Chandra Shyamlal Agrawal	AAGHR3394N
259	Bhavesh Shantilal Parikh	AAGHP7176N
260	Manoj Kumar Kothari	AAGHM6623M

261	Kamal Kishor Lahoti	AAGHK5990P
262	Brijesh Khandelwal	AAGHB7201Q
263	Ravindra C Jalan	AAFPJ1645P
264	Vinod Jain (HUF)	AAFHV1145L
265	Sunilkumar Omprakash Kamalia	AAFHS3147F
266	Dikul M Shah	AAFHS1796A
267	Satish Kumar Gupta	AAFHS0298P
268	Rameshkumar Kapoorchand Mehta (HUF)	AAFHR9008E
269	Nitinkumar Amichand Shah	AAFHN1170F
270	Mohan Lal Karsan Bhai And Sons - HUF	AAFHM4899C
271	Deepak Purushottam Patel (HUF)	AAFHD8387N
272	B M Sanghvi (HUF)	AAFHB1497K
273	Vilas Manohar Soman	AAEPS6800L
274	Meena Surendra Jain	AAEPJ7564J
275	Vijaykumar Krishnachand Chellani	AAEHV3521P
276	Sunil Kumar Agrawal	AAEHS2185N
277	Balkishan Agrawal	AAEHB9070P
278	Bharath	AAEHB4627C
279	Akhilesh B Acharya	AAEHA0777Q
280	Navin Chandru Soneji	AADPS6683C
281	Vijaykant Mavji Sayani	AADPS6161R
282	Jayantilal Gaturdas Mehta	AADPM5623Q
283	Praveen Mangilal Jain	AADPJ0540R
284	Acharaj Bai	AADPA2704Q
285	Kumarpal Joitalal Shah	AADHS4113B

286	Jagdish Karsan Patel and Sons HUF	AADHJ5944H
287	Ashish Chandrakant Savla HUF	AADHA7858K
288	Lalit Kumar Jain	AACPJ2345P
289	Shantilal Jain	AACPJ2250R
290	Shardadevi Rameshchandra Agrawal	AACPA4993L
291	Rajendra Prasad Agarwal	AACHR9476B
292	Keshrimal Mafatlal Seth (HUF)	AACHK3218A
293	Jayantilal G. Mehta (HUF)	AACHJ0515P
294	Chimanlal Nathalal Shah	AACHC6684C
295	Chandresh Vijay Sayani	AACHC5548K
296	Chetan Chopra	AACHC2956F
297	Rajnikant Bansilal Kansara	AABPK8730E
298	Balmukund Khubilal Baheti	AABPB3368D
299	Chetan N Thadeshwar	AABHT4744F
300	Lalit Kumar Jain (HUF)	AABHT4404Q
301	Patel Narendra Shivganbhai	AABHP3659M
302	Mangal Chand Chopra-Karta (M.C. Chopra HUF)	AABHM7807G
303	Mangilal Jawanmal Jain (HUF)	AABHM2855E
304	Manoj Chopra-Karta (M Chopra HUF)	AABHM2263C
305	Jugraj Rajendra Kumar-Karta (J. R. Kumar HUF)	AABHJ8594F
306	Ashwani Gupta	AABHG2422F
307	Bharat Nanalal Popat	AAAPP6701F
308	Shashikant B Kansara	AAHS9477H
309	Mangal Chand Rajendra Kumar Chopra-Karta	AAAHM6901J
310	Indermal Mangilal	AAAHJ0801F

311	Inder Chand Chopra-Karta (Inder C Chopra HUF)	AAAHIO438N
312	Rawal Chand Chopra-Karta (Rawal C Chopra HUF)	AAAHHC6175N
313	Swaroop Chopra-Karta (Swaroop Chopra HUF)	AAAHHC6001R
314	Bhanwar Lal Chopra-Karta (B.Chopra HUF)	AAAHHC6000Q
315	Rawal Chand Bhanwar Lal Chopra-Karta(R HUF)	AAAHHC2327J
316	Chandrakant Lalji Savla HUF	AAAHHC0497H
317	Aidos Trade Limited	AAACG1458P

- f) Bombay Stock Exchange Limited is directed to carry out inspection of the stock brokers (listed in Table 2 in Paragraph 10 in this order) through whom the related entities (Promoters, 1st level entities and 2nd level entities) have traded in the shares of Alka Securities Limited, to ascertain the level of due diligence exercised by them while dealing with these entities and to ascertain whether their trading system had in any way facilitated such entities in manipulating the securities of Alka Securities Limited. Bombay Stock Exchange Limited is further directed to submit its detailed report in the matter within two months of this order.
- g) The National Securities Depository Limited and Central Depository Services (India) Limited are directed to freeze the beneficial owner accounts of the persons/entities as per the above directions.
- h) Furthermore, investigation shall be carried out, *inter alia* on the following:
- i. The movement of shares from the account in the bank referred to earlier in this order, in which the shares had been pledged as collateral for the loan availed by the promoter Ms. Alka Pandey, to the 212 entities and the movement of funds underlying such transfers.

- ii. The role of the stock broker, Mahesh Kothari Shares & Stock Brokers Limited, in facilitating Alka Securities Limited to deal in its own shares and whether such transactions by Alka Securities Limited are in contravention of the provisions of the Companies Act, 1956.

31. The entities/persons against whom this order is passed may file their objections, if any, within fifteen days from the date of this order and, if they so desire, avail themselves of an opportunity of personal hearing before the Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, 'G' Block, Bandra Kurla Complex, Bandra (East), Mumbai -400051, on a date and time to be fixed on a specific request, to be received in this behalf from the entities/persons .

32. This order shall come into force with immediate effect.

Dr. K. M. ABRAHAM
WHOLE TIME MEMBER
SECURITIES AND EXCHANGE BOARD OF INDIA

Place: Mumbai

Date: July 28, 2009

Annexure A		
	1ST LEVEL ENTITIES	
S.no	Name	PAN
1	ALKA SECURITIES LIMITED	AAACA4835E
2	FAIRWEALTH SECURITIES PVT. LTD .	AAACF8795N
3	RAMSONS CASTINGS PRIVATE LIMITED	AAACR9195E
4	JMDE PACKAGING & REALTIES LIMITED J P & R LTD	AAACU1995M
5	KUNDANMAL R JAIN	AAAHK1020J
6	KAMLESH BAHETI	AAAHK6978H
7	LAXMILAL P KABRA	AA AHL6386G
8	VIKAS VATSAL GARG	AAAHV8230K
9	KETAN HASMUKHBHAI DOSHI	AAAPD8373R
10	ALPHA GRAPHIC INDIA LIMITED	AABCA8299H
11	BALUBHAI MANJIBHAI GAJIPARA	AABHB5738D
12	PIYUSH PRAFULCHANDRA AVLANI	AABPA1996N
13	TAKESHI MARKETING PVT.LTD .	AACCT4428L
14	RAMSWARUP S SARDA	AACHS7099R
15	Virendra Pandey	AACPP5316L
16	J.BALRAMAN .	AADHJ6453K
17	ASTER MERCANTILE PVT. LTD.	AAECA7369M
18	SAILESH H. DOSHI BROKING PRIVATE LIMITED SAILESH H. DOSHI BRO	AAECS7404H
19	BALMUKUND BAHETI	AAEHB8435N
20	DEEPAK CHOPRA HUF	AAEHD7308A

21	MUKESHKUMAR SHANKARLALJI MANDOWARA	AAEHM1705Q
22	S K NANGALIA AND SONS HUF	AAIHS0115G
23	RAKESH K JAIN (HUF) .	AAJHR9790R
24	VEENA S JAISINGH	AAJPJ6513G
25	SURESHCHANDRA GOYAL	AAOHS2706M
26	GYANCHAND JAIN	AASPJ4832D
27	DHIRAJ GHAI	AAVPG4321P
28	SURAJ K NANGALIA	ACAPN0914A
29	MITESH J. JANI	ACNPJ6429M
30	SUNIL KUMAR JAIN	ADNPJ1497J
31	SUSHIL KUMAR JAIN	ADNPJ1498H
32	VIMLA KANHAIYALAL JAIN	AFCPJ1691K
33	SHEETAL SURESH GOYAL	AFEPG7111B
34	SURESHCHADRA RAMESHWAR GOYAL	AFRPG7299B
35	ARUN KUMAR GOYAL	AGBPG9517F
36	MEGHA GOYAL	AGBPM7345M
37	LOKENDRA RAMESHCHUNILAL MANTRI	AHFPM4945G
38	SUMIT SURESHCHANDRA GOYAL	AJBPG9494J
39	VINAYAK BALIRAM GODAMBE	AKWPG1578M
40	ROSHINI SUSHIL PANDEY	ANOPP8597Q
41	VIRENDRA S PANDEY	APZPP8875L
42	ASHWINI TRADING PVT. LTD.,	AADCA9353N

Annexure B		
	2ND LEVEL ENTITIES	
S.no	Name	PAN
1	KUNJ SAURIN SHAH	BQBPS8034C
2	YOJANA SAKHARE	BPQPS6667R
3	YASMEEN ABDUL REHMAN	BLFPS5754Q
4	FATIMA ABDUL RAZAK SHIRVA	BJZPS7769F
5	ASRIN M. HANIF SHIRVA	BJZPS7768E
6	KHADEEJA S. HAMID SHIRVA	BJZPS7625G
7	PRAJAKTA SHINDE	BGFPS9869H
8	DEEPALI KOTHARI	BFDPK8567D
9	RITABEN P SANGHVI	BDAPS9921G
10	SACHIN P SANGHVI	BAEPS1536E
11	DARSHAN P SANGHVI	BAEPS1535H
12	JASVINDER KAUR SACHDEVA	AZPPS9626Q
13	NIRAV HIREN MEWADA	AYAPM7580K
14	NILABEN NITINBHAI SHAH	ATTPS1393Q
15	MADHU SHAH	ARUPS5096F
16	LALITA MAHENDRAKUMAR SHAH	ARRPS0077M
17	KUSUM SHARMA	APQPS5086K
18	ASIF MOHD ILIYAS SHAIKH	APGPS8577P
19	HARMEET SINGH BHASIN	ANZPB1452D
20	KAUSHIK HARDASBHAI PATODIYA	ANXPP8947P

21	RUPAL ASHISH SAVLA	ANVPS5240E
22	MONIKA MEHUL KESARIA	ANRPK4123E
23	NEETA R PATEL	ANMPP3819K
24	ARUNA VILAS SOMAN	ANEPS4783M
25	MANORMA KUNWAR	ANEPK6937D
26	RAGHURAM KANYAN SHETTY	AMWPS0596B
27	AHSAN MOHD ILIYAS SHAIKH	AMPPS9653L
28	SUMEET SUBHASH BHOIR	AMNPB9491R
29	NARESHKUMAR MAHESHKUMAR SAJNANI	AMMPS1396K
30	CHETNA RAMJI GANGAR	AMMPG4965C
31	PRABHJOT SINGH BHASIN	AMMPB0480F
32	SHAH RAMILA JAYANTILAI	AMIPS9108D
33	ASHISH DULANI	AMBPD8965E
34	K V R PRASAD	ALEPP7794B
35	VAISHALI SHARAD GAWDE	AKZPG4168Q
36	AJAY SARAF	AKYPS6638Q
37	RACHIT AGRAWAL	AKXPA7947D
38	PARVATI BEN PATEL	AKPPP1148P
39	VIJAYA BEN PATEL	AKPPP1147C
40	RASHMI BEN PATEL	AKPPP1146D
41	ANKIT SHASHIKANT KANSARA	AKPPK4485L
42	RICHA JAISWAL	AKFPJ0623D
43	BACHUBHAI BHURALAL PATEL	AKAPP1879N

44	G KAMAL	AJZPK6932H
45	MEENABEN G PATEL	AJWPP2146F
46	SACHIN BABASAHEB DESHMUKH	AJSPD3435F
47	SHEELA BABASAHEB DESHMUKH	AJSPD3434E
48	ADITYA PATHAK	AJRPP7868D
49	GITABEN SHASHIKANT SHAH	AJKPS9683C
50	TRILOCHAN SINGH SUCHDEV	AJGPS9694B
51	ADITYA PATEL	AJGPP7663P
52	KINJAL RAMANIK DAWADA	AJEPD3612L
53	PUSHPALATHA .	AJCPP9790R
54	NITIN DESHMUKH	AIOPD3929K
55	YOGITA MAHESH SAJNANI	AINPS8408F
56	DHARABEN MITESHBHAI SHAH	AINPS8200K
57	PANKAJKUMAR MISHRIMAL SANGHVI	AINPS4041C
58	KUSHAL SURENDRA MANGAL	AILPM3396A
59	ANAND MANGAL	AJIPM8446P
60	SAROJ SAYANI	AIIPS6271P
61	NAHID EJAZAHMED ANSARI	AIBPA3358E
62	RASHNA K BULSARA	AIAPB8713B
63	VASHANTIBEN CHANDULAL SHAH	AHXPS3318R
64	DEEPESH AGARWAL .	AHJPA1042N
65	SALONI AGARWAL	AHJPA1036G
66	SHASHIKANT NATVARLAL SHAH	AHFPS0201H

67	PATEL SHARDABEN AMRUTLAL	AHFPP7657J
68	SEHRUNNISA ABDUL Q KHAN	AHBPK6146P
69	DEVYANI MANJIT KUMAR PATEL	AGWPP5791M
70	SURBHI CHOPRA	AGWPC8809K
71	KIRAN JAIN	AGRPJ8263F
72	DHAVAL RAJESH GORASIA	AGQPG9683F
73	VINOD BHOGILAL SHAH	AGNPS4841E
74	DEVENDRA VINOD SHAH	AGNPS4840F
75	ASHOK LALCHAND SHAH	AGMPS0253K
76	PATEL ANITA PARESHBHAI	AGMPP0843N
77	SHEELA DEVI MAHAWAR	AGKPM2350B
78	RATNAMALA SUBHASH BHOIR	AGJPB9144K
79	SUBHASH GANU BHOIR	AGJPB9142R
80	POOJA JHALANI	AGBPJ2064L
81	INDIRABEN LAHERCHAND MEHTA	AGAPM6053H
82	UMA YOGENDRA ASHTEKAR	AFVPA7141Q
83	NILAMBEN BABULAL SANGHVI	AFNPS9256A
84	RAHUL R JAIN	AFNPJ4009A
85	NILESH RANKA	AFMPR9365N
86	TARACHAND JAIN (HUF)	AFMPM3339M
87	SANGEETHA JAIN	AFKPJ3114P
88	ABDUL QUDDUS KHAN	AFJPK2769J
89	SANDHYA AGRAWAL	AFIPA3683G

90	RAMKARAN AGRAWAL	AFIPA3681E
91	SUNIL KUMAR AGRAWAL	AFIPA3580J
92	SUMITRA CHOPRA	AFHPS5880C
93	MANISH GUPTA	AFHPG4246A
94	BINITA SUNILKUMAR KAMALIA	AFFPK8512H
95	MEGHA GUPTA	AFFPA5743L
96	JADEJA KUMAR MAHENDRASINH	AFDPJ3859A
97	SALOMY JACOB	AFAPJ2127C
98	RACHANA CHHAPARIA	AFAPC5297A
99	VARUN JAIN	AEZPJ3027M
100	G KANCHAN JAIN	AEYPK5942F
101	PREM KUMAR KAKKAR	AEYPK1378K
102	CHORGE PANDURANG APPA	AEYPC8035M
103	PIYUSH CHOPRA	AEXPC0055J
104	RAJNI KOTHARI	AEVPK0520N
105	VATSAL S VORA	AEUPV3374C
106	TANIKA RAVINDRA JALAN	AEUPJ9610H
107	LAXMI PATEL	AESPP3594E
108	JAGDISH PATEL	AESPP3593D
109	BHANUMATI PATEL	AESPP3426P
110	HEMLATA PATEL	AESPP3402P
111	SHIROMANI JAIN	AESPJ9821Q
112	SHEFALI DIKUL SHAH	AEQPS9087R

113	RAJ KUMARI GUPTA	AEOPG5752M
114	VINAY KUMAR AGARWAL	AEMPK0188B
115	DIVYA GUPTA	AEMPG5825R
116	NIMESH SURENDRAKUMAR BHAVSAR	AEMPB1809G
117	KAMLESH SURENDRA MANGAL	AEKPM3180R
118	ASHWANI KUMAR GUPTA	AEIPG1359L
119	MADHU GUPTA	AEGPG5088J
120	NAWAL KISHORE SONI	AEFPK5133H
121	NANDKISHOR DATTATRAY SAKHARE	AEEPS3558K
122	PRASHANT AGARWAL	AEEPA0496C
123	PREM KUMAR SHARMA	ADZPS0801K
124	DEEPAK UMEDCHAND MEHTA	ADZPM2112P
125	REKHA PARASMAL PARMAR	ADXPP3153F
126	RITU CHOPRA	ADVPJ1309H
127	KISHAN GOPAL MAHAWAR	ADTPM2663H
128	BABULAL MISHRIMAL SANGHVI	ADRPS3261K
129	SUNIL KUMAR KAMALIA	ADQPK8419E
130	SHANTI DEVI	ADQPD1519A
131	KAMOD DEVI BACHHAWAT	ADQPB6995C
132	KALPANA JAIN	ADNPJ8232B
133	GARIMA JAIN	ADNPJ3794Q
134	EKTA JAIN	ADNPJ1411E
135	GAURIBEN NARENDRA PATEL	ADLPP5395B

136	VINOD KUMAR NAVKAR	ADLPN9668D
137	SHAKUNTALA VIJAYKUMAR SHINDE	ADGPS9938J
138	BHARATHI DEVI	ADFPD3395P
139	MANISH PYARCHAND JAIN .	ADEPJ8351L
140	NANDITA GOYAL	ADEPG7628M
141	MANEESHA AGARWAL	ADBPA4571E
142	NITIN KUMAR GUPTA	ADAPG2090D
143	RAJEEV CHOPRA	ACWPC0302M
144	Mukul Agarwal	ACWPA6156D
145	KAMAL CHANDRA AGARWAL	ACWPA2659M
146	MAHESH TILUMAL SAJNANI	ACVPS6579H
147	VANDANABEN DEEPAKBHAI MEHTA	ACUPM6669B
148	NEETU JAIN	ACUPJ0651N
149	DIKUL MAHENDRAKUMAR SHAH	ACTPS7330L
150	PATEL BHAVESH BABUBHAI	ACSPP8982A
151	PARESH BABUBHAI PATEL	ACRPP9789J
152	MANISH KUMAR AGARWAL	ACRPA8001E
153	SACHIN JHA	ACMPJ3775B
154	MUSAJI IBRAHIM BALESARIA	ACMPB8350L
155	ILIAS	ACMPB8349M
156	MOHAMAD ARIF IBRAHIM BALESARIA	ACMPB8344G
157	ATAUL USMANGANI MEMON	ACLPM6801A
158	OM JAIN	ACJPJ0231F

159	INDIRA JAIN	ACIPT1312L
160	NARENDRA SHIVGANBHAI PATEL	ACIPP9283E
161	SANTOSH KUMAR JAIN	ACIPJ0790Q
162	PREMLATA DEVI CHHAPADIYA	ACIPC0675P
163	TEJMAL JAIN	ACHPJ5196M
164	NAVIN KUMAR JAIN	ACHPJ5194K
165	VIMAL KUMAR JAIN	ACHPJ5193Q
166	SARLA JAIN	ACHPJ5192R
167	ANJU DEVI AGARWAL	ACHPA6756E
168	RAJWANTI GUPTA	ACGPG2270C
169	MURARI BAJAJ	ACGPB5221Q
170	LAHERCHAND UMEDCHAND MEHTA	ACFPM2818M
171	MACHANI SHIVA PRASAD	ACEPP3107B
172	SURENDRA NATH TRIPATHI	ACDPT8173G
173	PIYUSH JAYANTILAL MALDE	ACDPM8876H
174	CHETAN CHOPRA	ACDPC9263C
175	SAROJ BAJAJ	ACCPB9661N
176	PRAMILA K. SETH	ACAPS6157N
177	CHAMPA DEVI CHOPRA	ACAPC8016A
178	SAJJAN CHOPRA	ACAPC8015D
179	CHANCHAL DEVI CHOPRA	ABYPC1654R
180	SUWA DEVI CHOPRA	ABYPC1653J
181	KAMLESH PRAKASH	ABVPP0701H

182	LALITHA J	ABVPL5168L
183	SHAKUNTALA DEVI JHALANI	ABUPJ0312R
184	SOHAN LAL JHALANI	ABUPJ0262A
185	SEETHARAM BALDEVA	ABTPB5317K
186	HEMAXIBEN RAJESHBHAI GORASIA	ABSPG1769P
187	RAJESHBHAI PRABHUDASBHAI GORASIA	ABSPG1768N
188	POONAM GUPTA	ABRPG2342K
189	GORA BAI	ABRPB5274B
190	PRAVEEN M JAIN	ABQPJ4771Q
191	MANGILAL JAIN	ABQPJ4769A
192	SUDHINDERKUMAR	ABNPS0846A
193	TARABEN S PARIKH	ABNPP5386N
194	KANTA LAHOTI	ABNPL7061L
195	MUKESH KUMAR JAIN	ABNPJ3627L
196	ASHISH KUMAR CHHAPADIYA	ABMPC4542L
197	MANISH KUMAR CHHAPADIYA	ABMPC4541K
198	PAWAN KUMAR CHHAPADIYA	ABMPC4540J
199	BABULAL BHANSALI	ABMPB6776F
200	ANANDBA MAHENDRASINH JADEJA	ABLPJ1921H
201	JADEJA DEVENDRABA RAJENDRASINH	ABLPJ1917H
202	RAJESH GUPTA	ABLPJ8623M
203	NATHMAL RAMESH KUMAR	ABKPR0083M
204	RAMESH CHAND	ABKPR0075R

205	BETULLAKHAN ASDULLAKHAN PATHAN	ABKPB6908R
206	VISHAKHA RAMESH BHEKARE	ABJPB7590A
207	SHEFALI BINDESH SHAH	ABIPS9335B
208	BINDESH MAHENDRA SHAH	ABIPS3612H
209	RADHESHYAM JAJU	ABIPJ0739L
210	ARCHANA PAREKH	ABFPP0259E
211	MAYA JHA	ABFPJ0945H
212	HARAPANAHALLI CHANDRASEKAR	ABDPC3035B
213	DINESH BHIKHABHAI GHEVARIYA	ABCPG0638B
214	OMPRAKASH JAJOO	ABBPJ8583D
215	GHANSHYAM JAJOO	ABBPJ8558Q
216	MOHAN LAL LAHOTI	ABAPL6200G
217	HEMANGINI SATISH SHAH	AAZPS7309H
218	HARESH KUMAR BABULAL	AAZPH6571L
219	SHABANA LALANI	AAXPL8934H
220	SHREE NIWAS LAHOTI	AAXPL1552D
221	KAMAL KISHOR LAHOTI	AAWPL4211A
222	SHANTI LAL LUNKAD	AAWPL0464H
223	RAJENDRA KUMAR LUNKAD	AAWPL0463A
224	SURYA DEVI LUNKAD	AAWPL0462B
225	NEERAJ KUMAR LUNKAD	AAWPL0459J
226	PREETI LUNKAD	AAWPL0458K
227	HAR PRASAD JAISWAL	AAWPJ2777M

228	SUDHA DATTATRAY ASHTEKAR	AAWPA8894L
229	KAMLA KANUNGO	AAVPK6244R
230	VIKITA S KANSARA	AAUPK0416A
231	TEEJA DEVI	AASPT2488B
232	RAMESH MARUTI BHEKARE	AAQPB4088H
233	NISARAHMED MOHMADYUSUF ANSARI	AAQPA3488C
234	BHAWNA DULANI	AAPPD3971J
235	MUKESH CHOPRA	AAPPC9599P
236	REKHA S CHOPRA	AAPPC9598N
237	REKHA R CHOPRA	AAPPC9597D
238	KAMLESH KUMAR M	AAOPK0619B
239	KHURSHEED MERCHANT	AANPM6069Q
240	MADHU BHANSALI	AANPB2492A
241	SATISH DEVICHAND SHAH	AAMHS9911E
242	VIJAY DOLANDAS MAKHIJA	AALPM8960E
243	GEETA PANKAJKUMAR JAIN	AAKPV1459L
244	SHANTILAL LUNKER	AAKHS3350M
245	RAJESH NEMCHAND SHAH	AAKHR1620K
246	RAVINDRA JALAN	AAJHR3464G
247	ANIL SHANTILAL PATEL (HUF) .	AAJHA3477L
248	SATISH CHOPRA	AAIPC6212E
249	SANGEETA CHOPRA	AAIPC6211H
250	RAJENDRA CHOPRA	AAIPC1036C

251	RAJESH MEHTA	AAIHR3010D
252	RAJESH DANTEWADIA	AAHHR8390B
253	P M SANGHVI HUF	AAHHP3138D
254	KIRIT RATILAL SHAH (HUF)	AAHHK6820R
255	ANAND S MASHRUWALA	AAGPM0003P
256	SAMIR LALANI	AAGPL5776N
257	SATISH CHOPRA-KARTA (SATISH CHOPRA HUF)	AAGHS0986P
258	RAMESH CHANDRA SHYAMLAL AGRAWAL	AAGHR3394N
259	BHAVESH SHANTILAL PARIKH	AAGHP7176N
260	MANOJ KUMAR KOTHARI	AAGHM6623M
261	KAMAL KISHOR LAHOTI	AAGHK5990P
262	BRIJESH KHANDELWAL	AAGHB7201Q
263	RAVINDRA C JALAN	AAFPJ1645P
264	VINOD JAIN HUF	AAFHV1145L
265	SUNILKUMAR OMPRAKASH KAMALIA	AAFHS3147F
266	DIKUL M SHAH	AAFHS1796A
267	SATISH KUMAR GUPTA	AAFHS0298P
268	RAMESHKUMAR KAPOORCHAND MEHTA (HUF)	AAFHR9008E
269	NITINKUMAR AMICHAND SHAH	AAFHN1170F
270	MOHAN LAL KARSAN BHAI AND SONS - HUF .	AAFHM4899C
271	DEEPAK PURUSHOTTAM PATEL (HUF) .	AAFHD8387N
272	B M SANGHVI HUF	AAFHB1497K
273	VILAS MANOHAR SOMAN	AAEPS6800L

274	MEENA SURENDRA JAIN	AAEPJ7564J
275	VIJAYKUMAR KRISHNACHAND CHELLANI	AAEHV3521P
276	SUNIL KUMAR AGRAWAL	AAEHS2185N
277	BALKISHAN AGRAWAL	AAEHB9070P
278	BHARATH	AAEHB4627C
279	AKHILESH B ACHARYA	AAEHA0777Q
280	NAVIN CHANDRU SONEJI	AADPS6683C
281	VIJAYKANT MAVJI SAYANI	AADPS6161R
282	JAYANTILAL GATURDAS MEHTA	AADPM5623Q
283	PRAVEEN MANGILAL JAIN	AADPJ0540R
284	ACHARAJ BAI .	AADPA2704Q
285	KUMARPAL JOITALAL SHAH	AADHS4113B
286	JAGDISH KARSAN PATEL AND SONS HUF .	AADHJ5944H
287	ASHISH CHANDRAKANT SAVLA HUF	AADHA7858K
288	LALIT KUMAR JAIN .	AACPJ2345P
289	SHANTILAL JAIN .	AACPJ2250R
290	SHARDADEVI RAMESHCHANDRA AGRAWAL	AACPA4993L
291	RAJENDRA PRASAD AGARWAL	AACHR9476B
292	KESHRIMAL MAFATLAL SETH HUF	AACHK3218A
293	JAYANTILAL G. MEHTA (HUF)	AACHJ0515P
294	Chimanlal Nathalal Shah .	AACHC6684C
295	CHANDRESH VIJAY SAYANI	AACHC5548K
296	CHETAN CHOPRA	AACHC2956F

297	RAJNIKANT BANSILAL KANSARA	AABPK8730E
298	BALMUKUND KHUBILAL BAHETI	AABPB3368D
299	CHETAN N THADESHWAR	AABHT4744F
300	LALIT KUMAR JAIN(HUF)	AABHT4404Q
301	PATEL NARENDRA SHIVGANBHAI	AABHP3659M
302	MANGAL CHAND CHOPRA-KARTA (M.C. CHOPRA HUF)	AABHM7807G
303	MANGILAL JAWANMAL JAIN HUF	AABHM2855E
304	MANOJ CHOPRA-KARTA (M CHOPRA HUF)	AABHM2263C
305	JUGRAJ RAJENDRA KUMAR-KARTA (J. R. KUMAR HUF)	AABHJ8594F
306	ASHWANI GUPTA	AABHG2422F
307	BHARAT NANALAL POPAT .	AAAPP6701F
308	SHASHIKANT B KANSARA	AAAH59477H
309	MANGAL CHAND RAJENDRA KUMAR CHOPRA-KARTA	AAAHM6901J
310	INDERMAL MANGILAL	AAAHIO801F
311	INDER CHAND CHOPRA-KARTA (INDER C CHOPRA HUF)	AAAHIO438N
312	RAWAL CHAND CHOPRA-KARTA (RAWAL C CHOPRA HUF)	AAAH6175N
313	SWAROOP CHOPRA-KARTA (SWAROOP CHOPRA HUF)	AAAH6001R
314	BHANWAR LAL CHOPRA-KARTA (B.CHOPRA HUF)	AAAH6000Q
315	RAWAL CHAND BHANWAR LAL CHOPRA-KARTA(R HUF)	AAAH62327J
316	CHANDRAKANT LALJI SAVLA HUF	AAAH60497H
317	AIDOS TRADE LIMITED .	AAACG1458P

Annexure C						
		Cash market		Off Market		
Promoter						
PAN	Name	buy	sell	receive	transfer	offload
AGEPP1076H	PANDEY ALKA M			3,685,000.00	9,375,000.00	5,690,000.00
AAACM3001E	MAHESH KOTHARI SHARES AND STOCK BROKERS PVT.			8,393,480.00	6,771,935.00	(1,621,545.00)
AAACM3199H	MAHESH KOTHARI SHARE & STOCK BROKERS PVT. LTD. MAHESH			8,373,043.00	11,161,622.00	2,788,579.00
AACPK2951Q	MAHESH NATVERLAL KOTHARI				1,500,000.00	1,500,000.00
AACPK8359C	BRIJESH MAHESH KOTHARI				133,500.00	133,500.00
AKBPK7311D	DIMPLE M KOTHARI			1,550,000.00	1,550,000.00	-
AACPP5315K	MAHENDRA PANDEY	248,500.00	107,800.00	140,700.00		
	Total	248,500.00	107,800.00	22,142,223.00	30,492,057.00	8,490,534.00
	As a % of Total trades	0.79%	0.34%			

1stlevelentity						
PAN	Name	buy	sell	receive	transfer	offload
AAACA4835E	ALKA SECURITIES LIMITED	1,053,618.00	966,639.00	20,000.00	20,000.00	(86,979.00)
AAACF8795N	FAIRWEALTH SECURITIES PVT. LTD .			10,000.00	400,600.00	390,600.00
AAACR9195E	RAMSONS CASTINGS PRIVATE LIMITED			250,000.00		(250,000.00)
AAACU1995M	JMDE PACKAGING & REALTIES LIMITED J P & R LTD	7,313,937.00	36,113.00	7,042,843.00	7,078,513.00	(7,242,154.00)
AAAHK1020J	KUNDANMAL R JAIN			20,000.00		(20,000.00)
AAAHK6978H	KAMLESH BAHETI		20,000.00	20,000.00		-
AA AHL6386G	LAXMILAL P KABRA			20,000.00		(20,000.00)
AAAHV8230K	VIKAS VATSAL GARG		150,000.00	300,000.00		(150,000.00)
AAAPD8373R	KETAN HASMUKHBHAI DOSHI			800,000.00		(800,000.00)
AABCA8299H	ALPHA GRAPHIC INDIA LIMITED	4,860,377.00	2,495,426.00	8,652,227.00	8,439,681.00	(2,577,497.00)
AABHB5738D	BALUBHAI MANJIBHAI GAJIPARA			625,000.00	625,000.00	-
AABPA1996N	PIYUSH PRAFULCHANDRA AVLANI			400,000.00		(400,000.00)
AACCT4428L	TAKESHI MARKETING PVT.LTD .	4,025,753.00	29,646.00	3,693,873.00	3,632,377.00	(4,057,603.00)

PAN	Name	buy	sell	receive	transfer	offload
AACHS7099R	RAMSWARUP S SARDA			50,000.00		(50,000.00)
AACPP5316L	Virendra Pandey			25.00		(25.00)
AADHJ6453K	J.BALRAMAN .			50,000.00		(50,000.00)
AAECA7369M	ASTER MERCANTILE PVT. LTD.	462,480.00	2,141,689.00	217,500.00	213,734.00	1,675,443.00
AAECS7404H	SAILESH H. DOSHI BROKING PRIVATE LIMITED SAILESH H. DOSHI BRO			500,000.00	111,985.00	(388,015.00)
AAEHB8435N	BALMUKUND BAHETI		32,000.00	30,000.00	2,000.00	4,000.00
AAEHD7308A	DEEPAK CHOPRA HUF			25,000.00		(25,000.00)
AAEHM1705Q	MUKESHKUMAR SHANKARLALJI MANDOWARA			10,000.00		(10,000.00)
AAIHS0115G	S K NANGALIA AND SONS HUF			125,000.00		(125,000.00)
AAJHR9790R	RAKESH K JAIN (HUF) .		40,000.00	25,000.00		15,000.00
AAJPJ6513G	VEENA S JAISINGH		7,500.00	50,000.00		(42,500.00)
AAOHS2706M	SURESHCHANDRA GOYAL			40,000.00		(40,000.00)
AASPJ4832D	GYANCHAND JAIN			25,000.00		(25,000.00)
AAVPG4321P	DHIRAJ GHAI			110,000.00	110,000.00	-

PAN	Name	buy	sell	receive	transfer	offload
ACAPN0914A	SURAJ K NANGALIA			125,000.00		(125,000.00)
ACNPJ6429M	MITESH J. JANI			44,000.00	44,000.00	-
ADNPJ1497J	SUNIL KUMAR JAIN			25,000.00		(25,000.00)
ADNPJ1498H	SUSHIL KUMAR JAIN			25,000.00		(25,000.00)
AFCPJ1691K	VIMLA KANHAIYALAL JAIN			20,000.00		(20,000.00)
AFEPG7111B	SHEETAL SURESH GOYAL			40,000.00		(40,000.00)
AFRPG7299B	SURESHCHADRA RAMESHWAR GOYAL			40,000.00		(40,000.00)
AGBPG9517F	ARUN KUMAR GOYAL		400,000.00	400,000.00		-
AGBPM7345M	MEGHA GOYAL		400,000.00	400,000.00		-
AHFPM4945G	LOKENDRA RAMESHCHUNILAL MANTRI		12,000.00	5,000.00		7,000.00
AJBPG9494J	SUMIT SURESHCHANDRA GOYAL			40,000.00		(40,000.00)
AKWPG1578M	VINAYAK BALIRAM GODAMBE	120,000.00	25,000.00	150,000.00	225,000.00	(20,000.00)
ANOPP8597Q	ROSHINI SUSHIL PANDEY			20,000.00		(20,000.00)
APZPP8875L	VIRENDRA S PANDEY	10,000.00			10,000.00	-
AADCA9353N	ASHWINI TRADING PVT. LTD.,	2,735,405.00		799,089.00	2,177,996.00	(1,356,498.00)

PAN	Name	buy	sell	receive	transfer	offload
	Total	20,581,570.00	6,756,013.00	25,244,557.00	23,090,886.00	(15,979,228.00)
	As a % of Total trades	65.52%	21.51%			
2nd Level entity						
BQBPS8034C	KUNJ SAURIN SHAH		33,750.00	33,750.00		-
BPQPS6667R	YOJANA SAKHARE		33,500.00	33,500.00		-
BLFPS5754Q	YASMEEN ABDUL REHMAN		16,000.00	16,000.00		-
BJZPS7769F	FATIMA ABDUL RAZAK SHIRVA		16,000.00	16,000.00		-
BJZPS7768E	ASRIN M. HANIF SHIRVA		16,000.00	16,000.00		-
BJZPS7625G	KHADEEJA S. HAMID SHIRVA		16,000.00	16,000.00		-
BGFPS9869H	PRAJAKTA SHINDE		65,000.00	65,000.00		-
BFDPK8567D	DEEPALI KOTHARI		20,000.00	20,000.00		-
BDAPS9921G	RITABEN P SANGHVI		29,000.00	29,000.00		-
BAEPS1536E	SACHIN P SANGHVI		25,900.00	25,900.00		-
BAEPS1535H	DARSHAN P SANGHVI		27,000.00	27,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AZPPS9626Q	JASVINDER KAUR SACHDEVA		30,000.00	30,000.00		-
AYAPM7580K	NIRAV HIREN MEWADA		13,500.00	13,500.00		-
ATTPS1393Q	NILABEN NITINBHAI SHAH		50,000.00	50,000.00		-
ARUPS5096F	MADHU SHAH		25,000.00	25,000.00		-
ARRPS0077M	LALITA MAHENDRAKUMAR SHAH		28,000.00	28,000.00		-
APQPS5086K	KUSUM SHARMA		48,200.00	48,200.00		-
APGPS8577P	ASIF MOHD ILIYAS SHAIKH	25,125.00	271,125.00	246,000.00		-
ANZPB1452D	HARMEET SINGH BHASIN		30,000.00	30,000.00		-
ANXPP8947P	KAUSHIK HARDASBHAI PATODIYA	60,000.00	60,000.00	90,006.00	60,000.00	(30,006.00)
ANVPS5240E	RUPAL ASHISH SAVLA		3,500.00	3,500.00		-
ANRPK4123E	MONIKA MEHUL KESARIA		17,500.00	17,500.00		-
ANMPP3819K	NEETA R PATEL		20,000.00	20,000.00		-
ANEPS4783M	ARUNA VILAS SOMAN		108,700.00	116,000.00	7,300.00	-
ANEPK6937D	MANORMA KUNWAR		150,000.00	150,000.00		-
AMWPS0596B	RAGHURAM KANYAN SHETTY		50,000.00	50,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AMPPS9653L	AHSAN MOHD ILIYAS SHAIKH		246,000.00	246,000.00		-
AMNPB9491R	SUMEET SUBHASH BHOIR		60,000.00	60,000.00		-
AMMPS1396K	NARESHKUMAR MAHESHKUMAR SAJNANI		25,000.00	25,000.00		-
AMMPG4965C	CHETNA RAMJI GANGAR		58,000.00	58,000.00		-
AMMPB0480F	PRABHJOT SINGH BHASIN		30,000.00	30,000.00		-
AMIPS9108D	SHAH RAMILA JAYANTILAI		6,500.00	6,500.00		-
AMBPD8965E	ASHISH DULANI		8,000.00	8,000.00		-
ALEPP7794B	K V R PRASAD	100.00	110,100.00	110,000.00		-
AKZPG4168Q	VAISHALI SHARAD GAWDE			50,000.00	50,000.00	-
AKYPS6638Q	AJAY SARAF		7,000.00	7,000.00		-
AKXPA7947D	RACHIT AGRAWAL		20,000.00	20,000.00		-
AKPPP1148P	PARVATI BEN PATEL		30,000.00	30,000.00		-
AKPPP1147C	VIJAYA BEN PATEL		30,000.00	30,000.00		-
AKPPP1146D	RASHMI BEN PATEL		30,000.00	30,000.00		-
AKPPK4485L	ANKIT SHASHIKANT KANSARA		15,000.00	15,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AKFPJ0623D	RICHA JAISWAL		35,000.00	35,000.00		-
AKAPP1879N	BACHUBHAI BHURALAL PATEL		48,000.00	48,000.00		-
AJZPK6932H	G KAMAL		90,000.00	100,000.00		(10,000.00)
AJWPP2146F	MEENABEN G PATEL		20,000.00	20,000.00		-
AJSPD3435F	SACHIN BABASAHEB DESHMUKH		45,000.00	45,000.00		-
AJSPD3434E	SHEELA BABASAHEB DESHMUKH		45,000.00	45,000.00		-
AJRPP7868D	ADITYA PATHAK		35,500.00	35,500.00	35,500.00	35,500.00
AJKPS9683C	GITABEN SHASHIKANT SHAH		20,000.00	20,000.00		-
AJGPS9694B	TRILOCHAN SINGH SUCHDEV		35,000.00	35,000.00		-
AJGPP7663P	ADITYA PATEL		35,000.00	35,000.00		-
AJEPD3612L	KINJAL RAMANIK DAWADA		13,500.00	13,500.00		-
AJCPP9790R	PUSHPALATHA .		30,000.00	30,000.00		-
AIOPD3929K	NITIN DESHMUKH		45,000.00	90,000.00	45,000.00	-
AINPS8408F	YOGITA MAHESH SAJNANI		17,000.00	17,000.00		-
AINPS8200K	DHARABEN MITESHBHAI SHAH		16,000.00	16,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AINPS4041C	PANKAJKUMAR MISHRIMAL SANGHVI		27,100.00	27,100.00		-
AILPM3396A	KUSHAL SURENDRA MANGAL		50,000.00	50,000.00		-
AIJPM8446P	ANAND MANGAL		45,000.00	45,000.00		-
AIIPS6271P	SAROJ SAYANI		17,600.00	17,600.00		-
AIBPA3358E	NAHID EJAZAHMED ANSARI		18,000.00	18,000.00		-
AIAPB8713B	RASHNA K BULSARA		40,000.00	40,000.00		-
AHXP33318R	VASHANTIBEN CHANDULAL SHAH		22,000.00	22,000.00		-
AHJPA1042N	DEEPESH AGARWAL .		18,000.00	18,000.00		-
AHJPA1036G	SALONI AGARWAL		18,000.00	18,000.00		-
AHFPS0201H	SHASHIKANT NATVARLAL SHAH		20,000.00	20,000.00		-
AHFPP7657J	PATEL SHARDABEN AMRUTLAL		43,000.00	43,000.00	43,000.00	43,000.00
AHBPK6146P	SEHRUNNISA ABDUL Q KHAN		190,000.00	190,000.00		-
AGWPP5791M	DEVYANI MANJIT KUMAR PATEL		35,000.00	35,000.00		-
AGWPC8809K	SURBHI CHOPRA		10,000.00	10,000.00		-
AGRPJ8263F	KIRAN JAIN		60,000.00	120,000.00		(60,000.00)

PAN	Name	buy	sell	receive	transfer	offload
AGQPG9683F	DHAVAL RAJESH GORASIA		145,000.00	145,000.00		-
AGNPS4841E	VINOD BHOGILAL SHAH		20,000.00	20,000.00		-
AGNPS4840F	DEVENDRA VINOD SHAH		20,000.00	20,000.00		-
AGMPS0253K	ASHOK LALCHAND SHAH		25,000.00	25,000.00		-
AGMPP0843N	PATEL ANITA PARESHBHAI		12,500.00	12,500.00		-
AGKPM2350B	SHEELA DEVI MAHAWAR		55,000.00	55,000.00		-
AGJPB9144K	RATNAMALA SUBHASH BHOIR		60,000.00	60,000.00		-
AGJPB9142R	SUBHASH GANU BHOIR		77,000.00	77,000.00		-
AGBPJ2064L	POOJA JHALANI		17,500.00	17,500.00		-
AGAPM6053H	INDIRABEN LAHERCHAND MEHTA		41,250.00	41,250.00		-
AFVPA7141Q	UMA YOGENDRA ASHTEKAR		410,000.00	410,000.00		-
AFNPS9256A	NILAMBEN BABULAL SANGHVI		40,000.00	25,000.00		15,000.00
AFNPJ4009A	RAHUL R JAIN		57,000.00	57,000.00		-
AFMPR9365N	NILESH RANKA		18,500.00	18,500.00		-
AFMPM3339M	TARACHAND JAIN (HUF)		10,000.00	10,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AFKPJ3114P	SANGEETHA JAIN		60,000.00	60,000.00		-
AFJPK2769J	ABDUL QUDDUS KHAN		155,000.00	155,000.00		-
AFIPA3683G	SANDHYA AGRAWAL		15,000.00	15,000.00		-
AFIPA3681E	RAMKARAN AGRAWAL		20,000.00	109,000.00		(89,000.00)
AFIPA3580J	SUNIL KUMAR AGRAWAL		15,000.00	105,000.00		(90,000.00)
AFHPS5880C	SUMITRA CHOPRA			7,700.00		(7,700.00)
AFHPG4246A	MANISH GUPTA		85,000.00	95,000.00	10,000.00	-
AFFPK8512H	BINITA SUNILKUMAR KAMALIA		23,000.00	23,000.00		-
AFFPA5743L	MEGHA GUPTA		95,600.00	95,600.00		-
AFDPJ3859A	JADEJA KUMAR MAHENDRASINH		13,000.00	13,000.00		-
AFAPJ2127C	SALOMY JACOB			65,000.00		(65,000.00)
AFAPC5297A	RACHANA CHHAPARIA		56,000.00	56,000.00		-
AEZPJ3027M	VARUN JAIN		13,000.00	26,000.00	13,000.00	-
AEYPK5942F	G KANCHAN JAIN		75,000.00	75,000.00		-
AEYPK1378K	PREM KUMAR KAKKAR		5,000.00	5,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AEYPC8035M	CHORGE PANDURANG APPA	211,858.00	104,118.00	107,465.00	107,465.00	(107,740.00)
AEXPC0055J	PIYUSH CHOPRA		11,000.00	11,000.00		-
AEVPK0520N	RAJNI KOTHARI		10,000.00	10,000.00		-
AEUPV3374C	VATSAL S VORA		62,300.00	62,300.00		-
AEUPJ9610H	TANIKA RAVINDRA JALAN		35,000.00	35,000.00		-
AESPP3594E	LAXMI PATEL		30,000.00	30,000.00		-
AESPP3593D	JAGDISH PATEL		30,000.00	30,000.00		-
AESPP3426P	BHANUMATI PATEL		30,000.00	30,000.00		-
AESPP3402P	HEMLATA PATEL		30,000.00	30,000.00		-
AESPJ9821Q	SHIROMANI JAIN		70,000.00	70,000.00		-
AEQPS9087R	SHEFALI DIKUL SHAH		60,000.00	60,000.00		-
AEOPG5752M	RAJ KUMARI GUPTA		30,000.00	30,000.00		-
AEMPK0188B	VINAY KUMAR AGARWAL			150,000.00		(150,000.00)
AEMPG5825R	DIVYA GUPTA		63,500.00	63,500.00		-
AEMPB1809G	NIMESH SURENDRAKUMAR BHAVSAR	20,000.00	54,000.00	54,000.00	20,000.00	-

PAN	Name	buy	sell	receive	transfer	offload
AEKPM3180R	KAMLESH SURENDRA MANGAL		50,000.00	50,000.00		-
AEIPG1359L	ASHWANI KUMAR GUPTA		130,000.00	130,000.00		-
AEGPG5088J	MADHU GUPTA		92,600.00	92,600.00		-
AEFPK5133H	NAWAL KISHORE SONI		16,000.00	16,000.00		-
AEEPS3558K	NANDKISHOR DATTATRAY SAKHARE		28,000.00	28,000.00		-
AEEPA0496C	PRASHANT AGARWAL		18,000.00	18,000.00		-
ADZPS0801K	PREM KUMAR SHARMA		61,800.00	61,800.00		-
ADZPM2112P	DEEPAK UMEDCHAND MEHTA		44,100.00	44,100.00		-
ADXPP3153F	REKHA PARASMAL PARMAR		255,000.00	200,000.00		55,000.00
ADVPI1309H	RITU CHOPRA		6,400.00	6,400.00		-
ADTPM2663H	KISHAN GOPAL MAHAWAR		55,000.00	55,000.00		-
ADRPS3261K	BABULAL MISHRIMAL SANGHVI		42,000.00	27,000.00		15,000.00
ADQPK8419E	SUNIL KUMAR KAMALIA		25,000.00	25,000.00		-
ADQPD1519A	SHANTI DEVI		100,000.00	100,000.00		-
ADQPB6995C	KAMOD DEVI BACHHAWAT		309,500.00	259,500.00		50,000.00

PAN	Name	buy	sell	receive	transfer	offload
ADNPJ8232B	KALPANA JAIN		60,000.00	60,000.00		-
ADNPJ3794Q	GARIMA JAIN		5,000.00	5,000.00		-
ADNPJ1411E	EKTA JAIN		35,000.00	35,000.00		-
ADLPP5395B	GAURIBEN NARENDRA PATEL		48,000.00	48,000.00		-
ADLPN9668D	VINOD KUMAR NAVKAR		18,000.00	18,000.00		-
ADGPS9938J	SHAKUNTALA VIJAYKUMAR SHINDE		68,000.00	68,000.00		-
ADFPD3395P	BHARATHI DEVI		100,000.00	100,000.00		-
ADEPJ8351L	MANISH PYARCHAND JAIN .		250,000.00	250,000.00		-
ADEPG7628M	NANDITA GOYAL		7,500.00	7,500.00		-
ADBPA4571E	MANEESHA AGARWAL		35,000.00	35,000.00		-
ADAPG2090D	NITIN KUMAR GUPTA		94,600.00	94,600.00		-
ACWPC0302M	RAJEEV CHOPRA		5,900.00	5,900.00		-
ACWPA6156D	Mukul Agarwal		35,000.00	35,000.00		-
ACWPA2659M	KAMAL CHANDRA AGARWAL		18,000.00	18,000.00		-
ACVPS6579H	MAHESH TILUMAL SAJNANI		17,000.00	17,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
ACUPM6669B	VANDANABEN DEEPAKBHAI MEHTA		44,000.00	44,000.00		-
ACUPJ0651N	NEETU JAIN		9,000.00	9,000.00		-
ACTPS7330L	DIKUL MAHENDRAKUMAR SHAH		62,000.00	125,000.00	63,000.00	-
ACSPP8982A	PATEL BHAVESH BABUBHAI		23,000.00	23,000.00		-
ACRPP9789J	PARESH BABUBHAI PATEL		22,500.00	22,500.00		-
ACRPA8001E	MANISH KUMAR AGARWAL		35,000.00	35,000.00		-
ACMPJ3775B	SACHIN JHA		30,000.00	30,000.00		-
ACMPB8350L	MUSAJI IBRAHIM BALESARIA		55,500.00	55,500.00		-
ACMPB8349M	ILIAS		55,200.00	55,200.00		-
ACMPB8344G	MOHAMAD ARIF IBRAHIM BALESARIA		110,000.00	110,000.00		-
ACLPM6801A	ATAUL USMANGANI MEMON		15,000.00	75,000.00		(60,000.00)
ACJPJ0231F	OM JAIN		5,000.00	5,000.00		-
ACIPT1312L	INDIRA JAIN		7,000.00	7,000.00		-
ACIPP9283E	NARENDRA SHIVGANBHAI PATEL		12,000.00	12,000.00		-
ACIPJ0790Q	SANTOSH KUMAR JAIN		35,000.00	35,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
ACIPC0675P	PREMLATA DEVI CHHAPADIYA		37,500.00	37,500.00		-
ACHPJ5196M	TEJMAL JAIN		5,000.00	5,000.00		-
ACHPJ5194K	NAVIN KUMAR JAIN		5,000.00	5,000.00		-
ACHPJ5193Q	VIMAL KUMAR JAIN		5,000.00	10,000.00	5,000.00	-
ACHPJ5192R	SARLA JAIN		5,000.00	5,000.00		-
ACHPA6756E	ANJU DEVI AGARWAL		80,000.00	80,000.00		-
ACGPG2270C	RAJWANTI GUPTA		85,000.00	135,000.00	50,000.00	-
ACGPB5221Q	MURARI BAJAJ		35,000.00	35,000.00		-
ACFPM2818M	LAHERCHAND UMEDCHAND MEHTA		45,250.00	45,250.00		-
ACEPP3107B	MACHANI SHIVA PRASAD		30,500.00	30,500.00		-
ACDPT8173G	SURENDRA NATH TRIPATHI	300.00	35,300.00	35,000.00		-
ACDPM8876H	PIYUSH JAYANTILAL MALDE		20,000.00	20,000.00		-
ACDPC9263C	CHETAN CHOPRA		11,200.00	11,200.00		-
ACCPB9661N	SAROJ BAJAJ		25,000.00	50,000.00	25,000.00	-
ACAPS6157N	PRAMILA K. SETH		15,000.00	15,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
ACAPC8016A	CHAMPA DEVI CHOPRA		7,700.00	7,700.00		-
ACAPC8015D	SAJJAN CHOPRA		9,500.00	9,500.00		-
ABYPC1654R	CHANCHAL DEVI CHOPRA		10,000.00	10,000.00		-
ABYPC1653J	SUWA DEVI CHOPRA		5,100.00	5,100.00		-
ABVPP0701H	KAMLESH PRAKASH		110,000.00	110,000.00	110,000.00	110,000.00
ABVPL5168L	LALITHA J		60,000.00	60,000.00		-
ABUPJ0312R	SHAKUNTALA DEVI JHALANI			17,500.00		(17,500.00)
ABUPJ0262A	SOHAN LAL JHALANI		17,500.00	17,500.00		-
ABTPB5317K	SEETHARAM BALDEVA		145,500.00	145,500.00		-
ABSPG1769P	HEMAXIBEN RAJESHBHAI GORASIA		125,000.00	125,000.00		-
ABSPG1768N	RAJESHBHAI PRABHUDASBHAI GORASIA		320,000.00	320,000.00		-
ABRPG2342K	POONAM GUPTA		80,000.00	80,000.00		-
ABRPB5274B	GORA BAI		17,500.00	17,500.00		-
ABQPJ4771Q	PRAVEEN M JAIN		100,000.00	100,000.00		-
ABQPJ4769A	MANGILAL JAIN		100,000.00	100,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
ABNPS0846A	SUDHINDERKUMAR		120,000.00	120,000.00		-
ABNPP5386N	TARABEN S PARIKH		160,000.00	160,000.00		-
ABNPL7061L	KANTA LAHOTI		35,000.00	35,000.00		-
ABNPJ3627L	MUKESH KUMAR JAIN		13,000.00	26,000.00	13,000.00	-
ABMPC4542L	ASHISH KUMAR CHHAPADIYA		18,500.00	18,500.00		-
ABMPC4541K	MANISH KUMAR CHHAPADIYA		18,500.00	18,500.00		-
ABMPC4540J	PAWAN KUMAR CHHAPADIYA		18,500.00	18,500.00		-
ABMPB6776F	BABULAL BHANSALI	200.00	60,200.00	60,000.00		-
ABLPJ1921H	ANANDBA MAHENDRASINH JADEJA		6,500.00	6,500.00		-
ABLPJ1917H	JADEJA DEVENDRABA RAJENDRASINH		6,500.00	6,500.00	6,500.00	6,500.00
ABLPG8623M	RAJESH GUPTA	40.00	90,000.00	125,000.00		(35,040.00)
ABKPR0083M	NATHMAL RAMESH KUMAR		25,000.00	25,000.00		-
ABKPR0075R	RAMESH CHAND		110,000.00	110,000.00		-
ABKPB6908R	BETULLAKHAN ASDULLAKHAN PATHAN		45,000.00	35,000.00		10,000.00
ABJPB7590A	VISHAKHA RAMESH BHEKARE		38,000.00	73,000.00		(35,000.00)

PAN	Name	buy	sell	receive	transfer	offload
ABIPS9335B	SHEFALI BINDESH SHAH		6,000.00	6,000.00		-
ABIPS3612H	BINDESH MAHENDRA SHAH		6,000.00	6,000.00		-
ABIPJ0739L	RADHESHYAM JAJU		15,900.00	31,800.00	15,900.00	-
ABFPP0259E	ARCHANA PAREKH		8,900.00	8,900.00		-
ABFPJ0945H	MAYA JHA		12,000.00	12,000.00		-
ABDPC3035B	HARAPANAHALLI CHANDRASEKAR		30,000.00	30,000.00		-
ABCPG0638B	DINESH BHIKHABHAI GHEVARIYA		40,000.00	40,000.00		-
ABBPJ8583D	OMPRAKASH JAJOO		15,800.00	24,600.00	8,800.00	-
ABBPJ8558Q	GHANSHYAM JAJOO		15,850.00	31,700.00	15,850.00	-
ABAPL6200G	MOHAN LAL LAHOTI		9,000.00	44,000.00	35,000.00	-
AAZPS7309H	HEMANGINI SATISH SHAH		30,000.00	30,000.00		-
AAZPH6571L	HARESH KUMAR BABULAL		100,000.00	100,000.00		-
AAXPL8934H	SHABANA LALANI			12,000.00		(12,000.00)
AAXPL1552D	SHREE NIWAS LAHOTI		35,000.00	35,000.00		-
AAWPL4211A	KAMAL KISHOR LAHOTI		35,000.00	35,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AAWPL0464H	SHANTI LAL LUNKAD		51,000.00	51,000.00		-
AAWPL0463A	RAJENDRA KUMAR LUNKAD		51,000.00	51,000.00		-
AAWPL0462B	SURYA DEVI LUNKAD		55,000.00	55,000.00		-
AAWPL0459J	NEERAJ KUMAR LUNKAD		51,000.00	51,000.00		-
AAWPL0458K	PREETI LUNKAD		55,000.00	55,000.00		-
AAWPJ2777M	HAR PRASAD JAISWAL		635,000.00	635,000.00		-
AAWPA8894L	SUDHA DATTATRAY ASHTEKAR		410,000.00	410,000.00		-
AAVPK6244R	KAMLA KANUNGO			11,200.00		(11,200.00)
AAUPK0416A	VIKITA S KANSARA		15,000.00	15,000.00		-
AASPT2488B	TEEJA DEVI		160,000.00	160,000.00		-
AAQPB4088H	RAMESH MARUTI BHEKARE		150,000.00	294,300.00		(144,300.00)
AAQPA3488C	NISARAHMED MOHMADYUSUF ANSARI		18,000.00	18,000.00		-
AAPPD3971J	BHAWNA DULANI		8,000.00	8,000.00		-
AAPPC9599P	MUKESH CHOPRA		14,800.00	14,800.00		-
AAPPC9598N	REKHA S CHOPRA		10,400.00	10,400.00		-

PAN	Name	buy	sell	receive	transfer	offload
AAPPC9597D	REKHA R CHOPRA		9,200.00	9,200.00		-
AAOPK0619B	KAMLESH KUMAR M		200,000.00	400,000.00		(200,000.00)
AANPM6069Q	KHURSHEED MERCHANT		16,000.00	16,000.00		-
AANPB2492A	MADHU BHANSALI		60,000.00	60,000.00		-
AAMHS9911E	SATISH DEVICHAND SHAH		18,000.00	18,000.00		-
AALPM8960E	VIJAY DOLANDAS MAKHIJA		50,000.00	50,000.00		-
AAKPV1459L	GEETA PANKAJKUMAR JAIN	50.00	60,000.00	60,000.00		(50.00)
AAKHS3350M	SHANTILAL LUNKER		75,000.00	75,000.00		-
AAKHR1620K	RAJESH NEMCHAND SHAH			16,000.00		(16,000.00)
AAJHR3464G	RAVINDRA JALAN		31,000.00	31,000.00		-
AAJHA3477L	ANIL SHANTILAL PATEL (HUF) .		30,000.00	30,000.00		-
AAIPC6212E	SATISH CHOPRA		13,600.00	13,600.00		-
AAIPC6211H	SANGEETA CHOPRA		9,500.00	9,500.00		-
AAIPC1036C	RAJENDRA CHOPRA		13,300.00	13,300.00		-
AAIHR3010D	RAJESH MEHTA		50,000.00	50,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AAHHR8390B	RAJESH DANTEWADIA		60,000.00	60,000.00		-
AAHHP3138D	P M SANGHVI HUF		25,500.00	25,500.00		-
AAHHK6820R	KIRIT RATILAL SHAH (HUF)		33,750.00	33,750.00		-
AAGPM0003P	ANAND S MASHRUWALA		100,000.00	100,000.00		-
AAGPL5776N	SAMIR LALANI			15,000.00		(15,000.00)
AAGHS0986P	SATISH CHOPRA-KARTA (SATISH CHOPRA HUF)		7,700.00	7,700.00		-
AAGHR3394N	RAMESH CHANDRA SHYAMLAL AGRAWAL		28,000.00	28,000.00		-
AAGHP7176N	BHAVESH SHANTILAL PARIKH		160,000.00	160,000.00		-
AAGHM6623M	MANOJ KUMAR KOTHARI		20,000.00	20,000.00		-
AAGHK5990P	KAMAL KISHOR LAHOTI		9,000.00	24,000.00	15,000.00	-
AAGHB7201Q	BRIJESH KHANDELWAL		21,000.00	21,000.00		-
AAFPJ1645P	RAVINDRA C JALAN		40,000.00	40,000.00		-
AAFHV1145L	VINOD JAIN HUF		60,000.00	60,000.00		-
AAFHS3147F	SUNILKUMAR OMPRAKASH KAMALIA		25,000.00	25,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AAFHS1796A	DIKUL M SHAH		63,000.00	63,000.00		-
AAFHS0298P	SATISH KUMAR GUPTA		93,600.00	93,600.00		-
AAFHR9008E	RAMESHKUMAR KAPOORCHAND MEHTA (HUF)		13,000.00	13,000.00		-
AAFHN1170F	NITINKUMAR AMICHAND SHAH		105,000.00	105,000.00		-
AAFHM4899C	MOHAN LAL KARSAN BHAI AND SONS - HUF .		30,000.00	30,000.00		-
AAFHD8387N	DEEPAK PURUSHOTTAM PATEL (HUF) .		30,000.00	30,000.00		-
AAFHB1497K	B M SANGHVI HUF		27,000.00	27,000.00		-
AAEPS6800L	VILAS MANOHAR SOMAN	8,000.00	127,000.00	145,000.00	26,000.00	-
AAEPJ7564J	MEENA SURENDRA JAIN		40,000.00	40,000.00		-
AAEHV3521P	VIJAYKUMAR KRISHNACHAND CHELLANI		12,500.00	12,500.00		-
AAEHS2185N	SUNIL KUMAR AGRAWAL		15,000.00	15,000.00		-
AAEHB9070P	BALKISHAN AGRAWAL		90,000.00	90,000.00		-
AAEHB4627C	BHARATH		80,000.00	80,000.00		-
AAEHA0777Q	AKHILESH B ACHARYA			12,000.00		(12,000.00)

PAN	Name	buy	sell	receive	transfer	offload
AADPS6683C	NAVIN CHANDRU SONEJI		40,000.00	40,000.00		-
AADPS6161R	VIJAYKANT MAVJI SAYANI		17,600.00	17,600.00		-
AADPM5623Q	JAYANTILAL GATURDAS MEHTA			53,250.00		(53,250.00)
AADPJ0540R	PRAVEEN MANGILAL JAIN		100,000.00	100,000.00		-
AADPA2704Q	ACHARAJ BAI .		60,000.00	60,000.00		-
AADHS4113B	KUMARPAL JOITALAL SHAH		33,750.00	33,750.00		-
AADHJ5944H	JAGDISH KARSAN PATEL AND SONS HUF .		30,000.00	30,000.00		-
AADHA7858K	ASHISH CHANDRAKANT SAVLA HUF		3,500.00	3,500.00		-
AACPJ2345P	LALIT KUMAR JAIN .		25,000.00	25,000.00		-
AACPJ2250R	SHANTILAL JAIN .		62,000.00	67,900.00	5,900.00	-
AACPA4993L	SHARDADEVI RAMESHCHANDRA AGRAWAL		28,000.00	28,000.00		-
AACHR9476B	RAJENDRA PRASAD AGARWAL		90,000.00	90,000.00		-
AACHK3218A	KESHRIMAL MAFATLAL SETH HUF		10,000.00	10,000.00		-
AACHJ0515P	JAYANTILAL G. MEHTA (HUF)			53,250.00		(53,250.00)
AACHC6684C	Chimanlal Nathalal Shah .		23,500.00	23,500.00		-

PAN	Name	buy	sell	receive	transfer	offload
AACHC5548K	CHANDRESH VIJAY SAYANI		12,000.00	12,000.00		-
AACHC2956F	CHETAN CHOPRA		11,000.00	11,000.00		-
AABPK8730E	RAJNIKANT BANSILAL KANSARA		20,500.00	100,500.00	80,000.00	-
AABPB3368D	BALMUKUND KHUBILAL BAHETI		10,000.00	2,000.00		8,000.00
AABHT4744F	CHETAN N THADESHWAR		20,000.00	20,000.00		-
AABHT4404Q	LALIT KUMAR JAIN(HUF)		8,500.00	8,500.00		-
AABHP3659M	PATEL NARENDRA SHIVGANBHAI		12,000.00	12,000.00		-
AABHM7807G	MANGAL CHAND CHOPRA-KARTA (M.C. CHOPRA HUF)		10,800.00	10,800.00		-
AABHM2855E	MANGILAL JAWANMAL JAIN HUF		100,000.00	100,000.00		-
AABHM2263C	MANOJ CHOPRA-KARTA (M CHOPRA HUF)		8,700.00	8,700.00		-
AABHJ8594F	JUGRAJ RAJENDRA KUMAR-KARTA (J. R. KUMAR HUF)		11,000.00	11,000.00		-
AABHG2422F	ASHWANI GUPTA		84,000.00	84,000.00		-
AAAPP6701F	BHARAT NANALAL POPAT .		650,000.00	650,000.00		-
AAAH59477H	SHASHIKANT B KANSARA		15,000.00	15,000.00		-

PAN	Name	buy	sell	receive	transfer	offload
AAAHM6901J	MANGAL CHAND RAJENDRA KUMAR CHOPRA-KARTA		14,800.00	14,800.00		-
AAAHI0801F	INDERMAL MANGILAL		100,000.00	100,000.00		-
AAAHI0438N	INDER CHAND CHOPRA-KARTA (INDER C CHOPRA HUF)		14,000.00	14,000.00		-
AAAHC6175N	RAWAL CHAND CHOPRA-KARTA (RAWAL C CHOPRA HUF)		10,000.00	10,000.00		-
AAAHC6001R	SWAROOP CHOPRA-KARTA (SWAROOP CHOPRA HUF)		8,900.00	8,900.00		-
AAAHC6000Q	BHANWAR LAL CHOPRA-KARTA (B.CHOPRA HUF)		15,300.00	15,300.00		-
AAAHC2327J	RAWAL CHAND BHANWAR LAL CHOPRA-KARTA(R HUF)		15,500.00	15,500.00		-
AAAHC0497H	CHANDRAKANT LALJI SAVLA HUF		3,500.00	3,500.00		-
AAACG1458P	AIDOS TRADE LIMITED .	1,054,235.00	3,034.00	244,985.00	376,600.00	(919,586.00)
	Total	1,379,908.00	15,822,277.00	17,530,806.00	1,242,815.00	(1,845,622.00)
	As a % of Total trades	4.39%	50.37%			

