

BEFORE THE SECURITIES APPELLATE TRIBUNAL
MUMBAI

Order Reserved on : 23.1.2014

Date of Decision: 11.2.2014

Appeal No.103 of 2013

Balwinder Singh, Prop. Of Gogia Investments
SCO: 421-422, 2nd Floor, Sector 35-C,
Chandigarh – 1600022.

..... Appellant

Versus

Securities and Exchange Board of India
SEBI Bhawan, Plot No. C-4A, G Block,
Bandra Kurla Complex, Bandra (East),
Mumbai - 400 051.

..... Respondent

None for the Appellant.

Mr. Kumar Desai, Advocate with Mr. Tomu Francis and Ms. Shubhra Sharma,
Advocates for the Respondent.

CORAM : Justice J. P. Devadhar, Presiding Officer
Jog Singh, Member
A S Lamba, Member

Per : A S Lamba, Member

1. Appellant through his Advocate has filed written submissions on 21.1.2014 and has requested for exemption from personal appearance. Accordingly the matter is heard and disposed of on the basis of written submissions of Appellant and after hearing Counsel for Respondent.

2. The present appeal has been preferred by Balwinder Singh; Proprietor Of Gogia Investments (hereinafter referred to as “Appellant”) against Securities and Exchange Board of India (hereinafter referred to as “Respondent”) in matter of Ind-Swift Laboratories Limited (hereinafter referred to as “ISLL”), against order no.EAD-2/AO/144/2013 dated February 18, 2013 (hereinafter referred to as “Impugned Order”) imposing a penalty of Rs. 10,00,000/- on Appellant by

Respondent for violation of provisions of Regulations 3 and 4(2)(g) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations, 2003 (hereinafter referred to as “PFUTP Regulations”) during period from August 1, 2010 to August 31, 2011 (hereinafter referred to as Investigation Period); in exercise of powers conferred on Respondent under Section 15I of Securities and Exchange Board of India Act, 1992 (hereinafter referred to as “SEBI Act”), read with Rule 5 of SEBI (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995 (hereinafter referred to as “Adjudicating Rules”).

3. Background: SEBI received certain alerts in their surveillance regarding abnormal trading viz. price/volume fluctuations in shares of ISLL during Investigation Period and started investigation in the matter. Investigations concentration/trading on top ten clients, whose trading in shares of the company during investigation period at Bombay Stock Exchange (BSE) and National Stock Exchange (NSE) was examined, and it was observed that Appellant had dealt significantly in shares of the company during Investigation period, and Appellant contributed 4.61% at BSE and 12.03% at NSE of gross traded volume in the market.

4. Alerts received by SEBI in their surveillance system indicated ‘Wash Trades’; also known as “Self trades” or “Fictitious Trades”; which refer to transactions in which buyer and seller is same person and do not result in actual change of ownership of the shares. During investigation by SEBI it was observed that Appellant had traded in 13,70,650 shares of ISLL at NSE and traded in 2,39,292 shares of ISLL at BSE during investigation period, which were wash trades.

5. During investigations in matter of ISLL by SEBI, it was also observed that Appellant had traded in 43 scrips of NSE during investigation period and had bought 24,14,950 shares and sold 23,52,675 shares in these scrips and 90% of

volume of these scrips was in shares of ISLL, whereby Appellant bought 22,42,423 shares of ISLL and sold 21,77,789 shares of ISLL. Similar was the trading pattern of Appellant at BSE, where 90% of volume of buy (3,55,717 shares) and sale (3,41,341 shares) in nine scrips was of ISLL, which revealed “prima-facie” that main concentration of Appellant in trading of shares, at both NSE and BSE during investigation period was in scrip of ISLL.

6. Investigations conducted by SEBI in matter of ISLL also allegedly revealed that Appellant is related/connected to promoter/director of ISLL since Appellant is owner of Gogia Investments, with contact no.0172-5072800; which is also contact no of Munjal Jain Estate Pvt. Ltd (whose directors are Nidhi Munjal and Sanjiv Jain) and that Nidhi Munjal is also one of the promoters of ISLL and Nidhi Munjal has same address as that of Managing Director (Navrattan Munjal) of ISLL. Investigations conducted by SEBI also alleged revealed that another client of Kotak Securities namely Kavajit Singh Gogia is related to Appellant and Appellant, at times, trades in stock market through other stock brokers besides trading through Kotak Securities.

7. In view of above, as per investigations, Appellant had indulged in wash trades/self trades/fictitious trades; which are manipulative/unfair/fraudulent in nature, as no actual beneficial ownership of shares was changed, in such transactions and are only meant to create false and misleading appearance of trading in securities market and thus Appellant by indulging into such kinds of transactions, violated provisions of Regulations 3 and 4(2)(g) of PFUTP Regulations.

8. Appellant written and oral submissions are mentioned below:

(i) Allegations imputed against him are wrong and denied. All transactions entered by him are genuine and bonafide as same were done at prevailing market price. No persons have been cheated due to his alleged transactions.

(ii) It is evident from facts of case that during investigation period, SENSEX was highest, at 19701.73 points and lowest 17506.63, and variation of 2195.10 points between the two was 11.14%. During same period, highest price of shares of ISLL at BSE was Rs. 107.65 and lowest was Rs. 90.05 and variation of Rs. 17.60 between two was 16.34%. Hence, there was no abnormal variation in price of shares of ISLL.

(iii) Regarding NIFTY during investigation period, NIFTY was highest at 5911.50 points and lowest at 5257.90 and variation of 653.60 points between two was 11.20%. During same period, highest price of shares of ISLL at NSE was Rs. 107.70 and lowest was Rs. 90.05 and variation of Rs. 17.65 between two was 16.38% and this variation was based on general market condition.

(iv) No wash trades / self trades / fictitious trades were done by Appellant and transactions were done as per normal market practices. The transactions were done periodically under compulsion to clear debit position from time to time. As per market practices, when a client wants to buy some shares, he has to provide margin of at least 20% to the broker. After shares have been bought, client has to make full payment within 5-7 days and if client is unable to make payment, he is advised by broker to sell shares of value equal of dues to clear debit in his account. Once debit is clear, client may again buy requisite shares on next trading day by maintaining margin. In his case, also, frequent transactions were done to meet obligation of clearing debit in trading account and intention was not to manipulate, defraud or to do any unfair trade practices.

(v) It is wrong and denied that he is related/ connected to the promoter / director of ISLL in any matter. From very beginning phone number 0172-5072800 was installed at his premises at SCO, 421-422, 2nd Floor, Sector 35-C, Chandigarh and he does not know as to how this phone number is mentioned against name of M/s Munjal Jain Estate Pvt. Ltd. in records of M/s Alankit Assignment Ltd. It is significant to point out that in annexure -IX attached with SCN, even against

name of Mr. Daljeet Singh Jolly, who is residing at house no. 285, sector 35-C, Chandigarh, same phone number (0172-5072800) is appearing. He has not done any transaction on behalf of Munjal Jain Estate Pvt. Ltd, Mr. Daljeet Singh Jolly and promoter of company. Mr. Kavajit Singh Gogia is his son, but his transactions are independent and separate. Therefore, he has not violated PFUTP regulations and matter may be closed.

9. After taking into account the allegations, reply of Appellant and other evidences / materials available on records, Adjudicating Officer, proceeded further to inquire case on merits and issues that arise for consideration as per Adjudicating Officer in present case are:

(a) Whether alleged transactions as executed by Appellant are by nature, wash trade / self trades/ fictitious trades.

(b) If yes, then whether under given circumstances, such trades can be treated as misleading/manipulative/fraudulent in nature?

(c) If yes, then whether Appellant has violated regulation 3 and 4 (2) (g) of PFUTP Regulations and also attracts imposition of monetary penalty under section 15 HA of the SEBI Act.

(d) If yes, then what appropriate monetary penalty is required to be imposed, taking into consideration factors mentioned in section 15 J of SEBI Act.

10. Adjudicating Officer finds that Appellant is proprietor of Gogia Investments which is a SEBI registered sub -broker of Kotak Securities Ltd at NSE & BSE and has its website www.gogiainvestments.com showing three contact numbers viz. 0172-5073100, 0172-5072800 and 9814520567. It is observed from MCA website and copy of Client Master from DWBIS of SEBI that a company namely: - Munjal Jain Estates Pvt. Ltd. (whose directors are: Nidhi Munjal and Sanjiv Jain as per website of MCA) is also having same contact number viz. 0172-5072800. Nidhi Munjal is one of the promoters of ISLL and

has same address as that of Managing Director of ISLL, namely-Navrattan Munjal. In respect to aforesaid links of Appellant with promoters of ISLL as shown under annexure VI to X of the SCN, Appellant refuted same as Telephone no. 0172-5072800 is in his name and he produced before Adjudicating Officer telephone bills in his name. Appellant admitted that Shri Kavajit Singh Gogia is his son who had also traded in the scrip of ISLL significantly.

11. Appellant had traded in scrip of ISLL, through three different brokers' viz. Kotak Securities Limited, Alankit Assignment Ltd and Master Capital Services Limited, at both BSE and NSE. On NSE, Appellant had traded in 43 scrips at NSE and 9 scrips at BSE during investigation period. On NSE total shares bought and sold in all scrips by Appellant were 2414950 and 2352675 shares respectively, and out of same, Appellant bought and sold 2242423 and 2177789 shares of ISLL. Similarly on BSE total shares bought and sold in all scrips were 355717 and 341341 shares respectively and out of same, Appellant bought and sold 345517 and 329491 shares of ISLL. Thus Appellant's trading concentrated in shares of ISLL at NSE and BSE, during investigation period was 90% of his total traded shares. Total contribution of Appellant and his son to market gross volume in scrip of ISLL was 15.29% at NSE and 6.05% at BSE.

12. Appellant and his son together, executed synchronized trades (placed orders within a time gap of 0 to 2 minutes) to extent of 11.3% and 4.53% of total market volume in scrip of ISLL, on NSE and BSE respectively. Out of above, Appellant executed wash trades in large quantities, where same person is buyer as well as seller of shares, in same transaction. In case of wash trades, there is no change in actual beneficial ownership of shares, and such trades are fictitious executed with sole intention of creating artificial volume and investors interest in scrip.

13. Appellant did not dispute the trading details as provided to him under Annexure IV and V of the SCN i.e. the order / trade logs. The Noticee mainly

contended that transactions were done as per normal market practices and to clear his debit position from time to time. He contended that as per market practices, when a client wants to buy some shares, he has to provide margin of at least 20% to the stock broker. After buying the shares, the client has to make the full payment in a period of 5-7 days. If the client is unable to make the payment, he is advised by the broker to sell the shares of the value equal to dues to clear the debit in his account. Once the debit is clear, client may again buy the shares in his trading account on next trading day maintaining required margin. In his case, also, frequent transactions were done to meet obligation of clearing his debit position in trading account.

14. As briefly stated above that wash trades are trades where same person is buyer as well as seller of the shares, in same transaction, and no actual beneficial ownership of shares in such sale/purchase is changed. In other words, person who wants to sell shares in a particular scrip and accordingly places sell orders in system through stock broker, he only purchases those shares by placing corresponding buy order. In such transactions, buy and sell orders are placed at same point of time or within a difference of few seconds only, so as to allow matching his both buy/sell orders. Certainly, indulgence into and adopting such device, mechanism, practice, are per - se illegal / void, as no beneficial ownership is changed in such kinds of trades, but are in nature to mislead investors and to invite attention in the scrip.

15. Adjudicating Officer finds from available records i.e. order/trade logs that Appellant had indulged in such kinds of trading (wash trades/self trades) from period August 01, 2010 to August 31, 2011. Appellant had executed huge number of 536 transactions (464 transactions at NSE and 72 Transaction at BSE) during this period, which are in nature of wash trades/self trades/fictitious trades. Said transactions resulted into trading of 13,70,650 shares at NSE, and 2,39,292 shares at BSE. It is observed from annexure IV (trade/order logs of NSE) that in almost

transactions, Appellant placed buy/sell orders with a difference from last traded price (LTP) and such kinds of trading were done by Appellant several times in a day. A table showing few example of such trades is shown below:

Date of wash / self / fictitious trades	Number of such transactions done in a day	Time duration of execution of all such trades in a day.
15, 16 & 29 September 2010	5 times	within two minutes only on September 16, 2010 and within two - three hour on 15 & 29 September 2010
December 07, 2010	9 times	within one hour
06, January 2011	22 time	within one hour
January 18, 2011	88 times	within two and half hour
January 27, 2011	10 times	within one hour
January 28, 2011	12 times	within four hour
15 & 18 March 2011	9 and 10 times	within half an hour on 15 March 2011 and within two hour on 18 March 2011
April 21, 2011	16 times	within one hour
17, 18 & 27 May 2011	7-8 times	within less than a hour
13 & 21 July 2011	9-11 times	within less than a hour
13 August 2011	28 times	within a hour

16. Taking into consideration trading pattern of Appellant, fact cannot be ignored that if Appellant had been a genuine investor and was not having any manipulative intent, then he could not have adopted such mechanism of selling/purchasing shares of same scrip to himself several times in a day, which continued for almost a year. Adjudicating Officer hence cannot ignore the fact that these trades are not stray transactions, as 536 transactions are considerable in

numbers which itself suggests that same are intentionally put in system of stock exchange by Appellant with manipulative intent.

17. It is beyond understanding as to how contention of Appellant that said transactions were entered into by him to clear debt obligations, is relevant? By virtue of his contention itself, he is required to sell shares, not to himself, but to someone else in market to set off the obligations. If he is selling the share to someone else against his buying position, then only his contention can be looked into otherwise. But, in the given case, he bought as well as sold the same share in his account. In this context it is pertinent to note that on January 18, 2011 Appellant bought 8000 shares of ISLL on BSE through broker Alankit and seller for transactions was himself through broker Kotak Securities Limited. On same day, he bought on NSE large quantity of shares of ISLL through Kotak Securities Ltd by executing 88 wash trades where seller for these transactions were himself through Alankit Assignment Limited. Therefore, contentions raised by Appellant are not acceptable.

18. Appellant also placed reliance upon two case laws of this Tribunal in his support viz. Rakhi Trading Pvt. Ltd vs. SEBI (Appeal No. 70 of 2009 decided on October 11, 2010 and Safal Investment Ltd. vs. SEBI (Appeal No. 74 of 2006 decided on August 06, 2007. Adjudicating Officer carefully perused said judgments and observed that these are not related to facts and circumstances of present case, and hence, are not applicable towards present proceedings. It is not out of place to mention that for similar kinds of trading, this Tribunal in matter of Shankar Sharma Vs. SEBI (Appeal No. 14/2009 decided on October 28, 2009), observed as follows -

“ It is thus clear that the appellant was on both sides. He was the buyer as well as the seller. The buy and sell orders were put into the system at almost the same time. Such trades have been executed in large quantities while dealing with the shares of different companies. We have no hesitation to hold that these

trades were fictitious as there was no change in the beneficial ownership of the shares traded and it was the appellant on both sides of the trades. How can a person buy from himself and sell to himself. Such trades are only meant to create artificial volumes and they disturb the market equilibrium". Therefore, taking into consideration the above position of law, I am of the firm opinion that the Noticee had indulged in the said fictitious trades which are per se illegal and only meant to artificially create the volumes in the scrip".

19. From foregoing, it is evident that Appellant had indulged in wash trade / self trades / fictitious trades which are manipulative/unfair/ fraudulent in nature as discussed above and thereby violated provisions of regulation 3 and 4 (2) (g) of the PFUTP Regulations, warranting imposition of monetary penalty under section 15HA of the SEBI Act.

20. Appellant did not appear before SAT on January 23, 2014 or was represented through any legal counsel, but submitted his written arguments and desired SAT to pass appropriate orders on basis of written arguments. Written arguments of Appellant have been perused and it is seen that all arguments of Appellant find place in his memorandum of Appeal September 21, 2013, except SEBI vide circulars no. CIR/DNPD/5/2011 dated June 2, 2011 and CIR/MRD/DP/05/2013 dated February 8, 2013 had validated and promoted NASI TRADES/SELF TRADES in derivative segment and cash market respectively. As per these circulars, as interpreted by Appellant, SEBI has permitted stock exchanges to introduce one or more Liquidity Enhancement Schemes (LES) to enhance liquidity of illiquid securities in equity derivative segments and also in cash market.

21. This averment was not pleaded by Appellant before learned Adjudicating Office SEBI or in grounds of appeal before this Tribunal and hence cannot be now taken into consideration by SAT, at this stage. However, it may be noted

that purpose of above two circulars of SEBI, mentioned in para above, appears, totally different from what is contended by Appellant.

22. While examining the findings of the learned Adjudicating Officer in light of facts of the present case, keeping in view applicable Act and Rules, it is seen that:

23. Appellant transacted 536 transactions – 464 transactions (involving 13,70,650 shares) on NSE and 72 transactions (involving 2,39,292 shares) on BSE – of wash trades/self trades/fictitious trade, in scrip of ISLL between August 1, 2010 and August 31, 2010; which trades (sale/purchase) do not result in beneficial ownership of shares since buyer as well as seller on both ends is the same person and these trades are in nature to mislead investors and destabilize securities market.

24. Appellant has not denied carrying out these wash trades/self trades in scrip of ISLL during investigation period, but justified these trades in order to square his outstanding position since he was not able to pay his outstanding dues to broker, when payment became due and hence sold his holding in ISLL. After clearing his outstanding dues to broker by selling his holding in ISLL to himself, he became eligible to further buy ISLL next day and did this repeatedly since he was bullish about ISLL and his independent research in ISLL led him to trade in scrip of ISLL.

25. This argument of Appellant cannot be accepted since self trades/wash trades are per se not allowed under SEBI Act/Rules, since these do not result in actual/beneficial ownership of shares and only result in increase in volumes in particular scrip, which create illusion of increased trading in these scrip and may mislead investors in trading in these scrips and disturb/distort securities market.

26. Appellant contention that he was in debit position, after buying ISLL stock by providing 20% margin money, but at time of settlement, when balance 80% of purchase amount was to be paid but he was unable to pay; Appellant squared his

buy position by selling the same and thus became eligible to buy again; but purchaser was the Appellant himself through some other broker. This argument of Appellant cannot be accepted since by being on both sides of trade i.e. purchase and sale, no beneficial change in ownership of shares taken place and no money changes hand but certainly the person, indulging in self trade reverses his buy/sell position to sell/buy position.

27. Learned Adjudicating Officer has included case of synchronized trades between Appellant and his son (Kavajit Gogia) in scrip of ISLL. This may be correct on basis of some information available to learned Adjudicating Officer but this has not been spelt out in impugned order or was included, at any stage, in show cause notice (SCN) (Notice No. EAD-2/JP/22049/2012 dated September 13, 2012) in impugned order and hence cannot and should not be part of impugned order, especially when Appellant was not provided an opportunity to defend this allegation at any stage. However, Appellant has stated that although his son also traded in scrip of ISLL during investigation period, it was his son's independent decision and has nothing to do with Appellant's trading in scrip of ISLL. This holds more, since Appellant's son is not one of Noticee in this present case and he has nothing to do in this case and his role should not have found any mention in impugned order.

28. Learned Adjudicating Officer has also concluded that telephone no.0172-5072800, though billed and paid by Appellant, is also mentioned against company-namely Munjal Jain Estate Pvt. Ltd., whose one of the directors, namely, Nidhi Munjal is one of the promoters of ISLL. Nidhi Munjal has same address as that of Managing Director of ISLL, namely, Navrattan Munjal.

29. In this content Appellant has represented that telephone no.0172-5072800 is installed in his office premises and he pays for same and he does not know as how the same is mentioned against company, namely Munjal Jain Estate Pvt. Ltd., and hence Respondent should have investigated this aspect by serving notice

on Munjal Jain Estate Pvt. Ltd. and finding out the truth and not simply taking it to be the truth by simply relying on MCA website and copy of Client Master DWBIS of SEBI and connecting Nidhi Munjal to Appellant and hence ISLL to Appellant.

30. Similarly, another conclusion drawn by learned Adjudicating Officer that Nidhi Munjal, one of the promoters of ISLL, has same address as that of Managing Director of ISLL, namely Navratan Munjal. From perusal of entire papers relating to the case, address of Navratan Munjal could not be located. However, it may be stated that even if it is established that Nidhi Munjal and Navratan Munjal have the same address, it is not stated anywhere as to how this fact supports allegations against Appellant. This is a case of unnecessary and irrelevant mentioning of some facts, which are not established and have no bearing on the case.

31. Accordingly this Tribunal is of the view that learned Adjudicating Officer should have gone deeper into this relationship connection details, by holding proper enquiry, before establishing relationship/connection between ISLL and Appellant and taking this relationship connection to be the basis for Appellant trading in scrip of ISLL and thereby executing self trades/wash trades in this scrip to increase volumes of ISLL scrip during investigation period.

32. Mention has also been made of fact that wash trades/self trades were executed by Appellant a large number of times on both BSE and NSE and in almost all these trades/transactions Appellant placed buy/sell orders with a difference of LTP and learned Adjudicating Officer goes further to show this on basis of table at para 14 supra. However a perusal of this table shows date of wash trade, number of such transaction done in a day, Time duration of execution of all such trades in a day; but price being different from LTP in almost all wash trades/self trades; has not been shown.

33. With regard to imposition of penalty of Rs.10,00,000/- on Appellant, one of the factors taken into consideration has been Appellant's role in placing orders with LTP difference in almost sell/buy orders. This is also mentioned in AFFIDAVIT IN REPLY ON BEHALF OF THE RESPONDENT; where it is mentioned that Appellant had placed buy/sell orders with a difference from the last traded price (LTP), which shows malafide intent on the part of the Appellant. However, no statistics/figures have been placed on record to substantiate this charge. In case, Respondent were privy to any such information of price manipulation, the same should have been placed on record, before relying on same for purpose of holding Appellant guilty of violation of SEBI Act/Rules, but mere mention of same, without placing the same on record; is not appreciated by this Tribunal.

34. In above connection, from perusal of case record, written arguments of Appellant, Memorandum of Appeal and arguments of learned counsel for SEBI, it is seen that:

Case has not been investigated in its entirety, since 10 entities were found to have traded heavily in scrip of ISLL during investigation period, but however, only one has been proceeded against.

35. The case was started to investigate price/volume manipulation of ISLL scrip during IP but subsequently price aspect was not pursued and only manipulations in volumes of ISLL was studied, though price manipulation has not been entirely given up and is mentioned in passing.

36. Complete investigation in relationship/connection was not carried and what is mentioned is found of entirely satisfactory.

37. Volume manipulation is also violative of SEBI Act/Rule, but what was the purpose of such manipulation should also have been looked into.

38. Perusal of impugned order brings out extraneous factors, such as Appellant trading in 43 scrips, but having concentration in scrip of ISLL, Appellant placing

buy/sell orders at prices above LTP, bringing in role of Appellant son in trading of ISLL scrip, with mention that Appellant/son indulged in synchronized trade but did not give any statistics/instance to prove this and also not following this up; quoting that Nidhi Munjal – promoter director of Munjal Jain Estate Co. staying at same address as Navratan Munjal, another director/promoter of ISLL, without stating address of Navratan Munjal and even if this is true how this fact is relevant to case. It would have been better for Adjudicating Officer to state only those facts which can be proved on basis of evidence and are relevant to the case.

39. After eliminating possibilities of synchronized trade trading with price manipulation and having relation/connection with promoter/director of ISLL, the only violation that remains is that of self trade/wash trade, which has in fact, not been denied by Appellant himself and has admitted all these 536 transactions of self trades in scrip of ISLL during investigation period. However, the explanation offered by Appellant for these wash trades/self trades that the same were necessary to square his buy position in scrip of ISLL to avoid paying for the shares, he chose to sell his trades in ISLL scrip, so that he could trade in same scrip. This is not acceptable since selling his shares to himself does not get him cash but adds to volume in scrip of ISLL, which gives false appearance of trading in scrip to investors. Hence, clearly Appellant violated PFUTP Regulations by indulging in self trades or wash trades in ISLL scrip and Respondent has rightly held him violative of PFUTP Regulations.

40. With regard to application of section 15J of SEBI Act to determine penalty, learned Adjudicating Officer has himself admitted that investigations have not revealed unlawful gain to Appellant nor he has information/details to arrive at the figures of profit to Appellant.

41. Learned Adjudicating Officer has taken into consideration seriousness of manipulations, enormous number of aforesaid manipulations with LTP difference in almost sell/buy orders, adverse impact of such act in disturbing equilibrium of

fair market, shaking investor's confidence in the scrip, etc. and hence a penalty of Rs.10,00,000/- has been imposed on Appellant.

42. In view of above, charge of volume manipulation against Appellant has been conclusively proved by his wash trade/self trades in scrip of ISLL during investigation period; which has in turn lead to undermining investor's confidence in securities market and disturbing equilibrium of securities market; the appeal is not allowed. No order as to costs.

Sd/-
Justice J.P. Devadhar
Presiding Officer

Sd/-
Jog Singh
Member

Sd/-
A S Lamba
Member

11.2.2014

Prepared and compared by
RHN