



Metropolitan Stock Exchange of India Limited

Department: Investigation

Segment: All

Circular No: MSE/ID/7684/2019

Date : May 23, 2019

SEBI Order in the matter of Highbrow Market Research Private Limited (ways 2 Capital)

To All Members,

SEBI vide Order no SEBI/WTM/MPB/IMD/ILO/ 48 /2019 dated May 23, 2019, has directed as under for below mentioned noticees :-

Sr. No.	Name of Noticees	PAN
1	Highbrow Market Research Private Limited (ways 2 Capital)	AACCH8077M
2	Chandan Singh Rajput	AWYPR5207Q
3	Rahul Trivedi	AQNPT9607R
4	Sunil Atode	NA
5	Girish Kumar Pahwani	CILPP0738B
6	Laxmikant Sharma	BNYPS4320M
7	Mohit Chhapparwal	AGOPC0896Q
8	Hemant Agrawal	AOBPA3520Q
9	Swapnil Prajapati	BTWPP9571K

- a) Highbrow and its directors (present and past) are restrained from buying, selling or dealing in the securities market or associating themselves with securities market, either directly or indirectly, in any manner whatsoever, till further directions.
- b) The Noticees and any other employee/person working under them as part of the overall modus operandi discussed in this order shall cease and desist from undertaking any activity in the securities market including the activity of acting and representing through any media (physical or digital) as an investment advisor, directly or indirectly, in any manner whatsoever till further directions.
- c) The Noticees are directed to provide a full inventory of all assets held in their name, whether movable or immovable, or any interest or investment or charge on any of such assets, including details of all bank accounts, demat accounts and mutual fund investments, immediately but not later than 5 working days from the date of receipt of this order.
- d) Highbrow is directed not to dispose of or alienate any assets, whether movable or immovable, or any interest or investment or charge on any of such assets, held in their name, including money lying in bank accounts except with the prior permission of SEBI.
- e) The depositories are directed to ensure that till further directions no debits are made in the demat accounts, of Highbrow held jointly or severally.
- f) The banks are directed to ensure that till further directions, no debits are made in the bank accounts held by Highbrow jointly or severally.

- g) The Registrar and Transfer Agents are also directed to ensure that till further directions the securities held in the name of Highbrow, jointly or severally, are not transferred.

The order shall come into force with immediate effect.

Members of the Exchange are advised to take note of the full text of the order available on SEBI's website [www.sebi.gov.in] and ensure compliance.

**For and on behalf of
Metropolitan Stock Exchange of India Limited**

Prachi Lendhe
Assistant Vice President