

Department: Investigation	Segment: All
Circular No: MSE/ID/9446/2020	Date : September 04, 2020

Subject: SEBI Order in the matter of Sulabh Engineers and Services Limited

To All Members,

SEBI vide order no. WTM/MB/IVD/ID4/8865/2020-21 dated September 3, 2020, has issued the following directions:

- a) The Connected Noticees mentioned in the table below are hereby restrained from accessing the securities market for a period as mentioned in the table from the date of this order and are also prohibited from buying, selling or otherwise dealing in securities, directly or indirectly, or being associated with the securities market in any manner, whatsoever, for the same period, from the date of this order. In view of prohibition on sale of securities, it is clarified that during the period of restraint, the existing securities holding, including units of mutual funds, of the Connected Noticees shall remain frozen. It is made clear that if the Noticees have any open positions in any exchange traded derivative contracts, they can close out / square off such open positions within 3 months from the date of order or at the expiry of such contracts, whichever is earlier. It is also clarified that the Noticees can settle the pay-in and pay-out obligations in respect of transactions, if any, which have taken place before the close of trading on September 3, 2020.

Sr. no	Name of the Entity	PAN	Years
1	Subodh Agarwal	ABNPA4910B	7
2	Manoj Kumar Agarwal	ACFPA8077Q	7
3	Deepa Mittal	AGZPM0492K	7
4	Raj Kumar Agarwal	ADNPA5935E	5
5	Anant Fin Consultancy Pvt Ltd	AAHCA6049D	5
6	Surendra Kumar Agarwal	AEXPA7231G	5
7	Renu Agarwal	ABTPA6753A	5
8	Deepak Kumar Sarraf	BYVPS8100B	5
9	Subodh Agarwal HUF	AARHS4396C	5
10	Kavita Awasthi	AEFPA0316N	5
11	Rishi Kant Awasthi	ABTPA6752B	5
12	Rita Jain	ADLPJ0701D	5
13	Akhilesh Kumar Agnihotri	AFXPA9503Q	5
14	Jeetendra Kumar Agnihotri	ANAPA1509P	5
15	Ankit Jain	AGAPJ8105H	5
16	Sanjai Jain Huf	AARHS1381K	5

Metropolitan Stock Exchange of India Limited

Sr. no	Name of the Entity	PAN	Years
17	Divya Agarwal	AARHS1381K	5
18	Pranveer Singh	AGIPS4486N	5
19	Geeta Mishra	AICPM8816G	5
20	Praveen Kumar Mishra	AFYPM1852K	5
21	Shubhang Exports Ltd	AAJCS1526R	5
22	Sanjay Kumar	AARPS2632K	5
23	SKM Travels Pvt Ltd	AAICS0688K	5
24	Sanklap Vincom Pvt Ltd	AAMCS1711P	5
25	Shrishti E Systems Pvt Ltd	AANCS0940H	5
26	KPK Fin Consultancy Pvt Ltd	AAECK1577D	5
27	Shreya Stocks and Shares Pvt Ltd	AAHCS4970M	5
28	Raghuvansh Agrofarms Ltd	AABCR8407N	5
29	Signet Vinimay Pvt Ltd	AAMCS1712Q	5
30	Apex Commotrade Pvt Ltd	AAJCA4459K	5
31	Spice Merchants Pvt Ltd	AAPCS7492G	5
32	Aviral Industries Ltd	AAJCA9165G	5
33	Bakliwal Vyapaar Pvt Ltd	AADCB1238R	5
34	Kamta Prasad Pandey	AIPPP5293B	5
35	Runicha Merchants Pvt Ltd	AAECR0580M	5
36	Jasmine Commodities Pvt Ltd	AABCI9295Q	5
37	Winall Vinimay Pvt Ltd	AAACW8004B	5
38	Vasundhara Capital & Securities Ltd	AABCO6950F	5
39	Arise Dealcom Pvt Ltd	AAJCA5108R	5
40	Swapanloke Steels Pvt Ltd	AALCS7102D	5
41	Scope Vyapar Pvt Ltd	AAICS6023N	5
42	Lemon Vincom Pvt Ltd	AABCL7829A	5
43	Litmus Investments Ltd	AABCL0009J	5
44	Lark Commercial Pvt Ltd	AABCL8354Q	5
45	Lark Merchants Pvt Ltd	AKUPS4580M	5
46	Sandhya Agarwal	ACVPA1791R	5
47	Ruchi Agarwal	ADHPJ2647J	5
48	Krishana Agarwal	ACFPA8079A	5
49	Manish Agarwal	ABBPA2326D	5
50	Santosh Kumar Agarwal	ABKPA7972Q	5
51	Manoj Agarwal	ABBPA2306H	5
52	Praveen Kurele	ADKPK9580A	5
53	Vinay Kumar Agarwal	ACAPA3335N	5
54	Som Prakash Goenka	AAQPG0238C	5
55	Naveen Kurele	AGUPK5822A	5
56	Mridula Agrawal	ACBPA5048D	5
57	Narender Kumar	AARPS2630M	5
58	Manisha Sharma	BATPS3099D	5

Sr. no	Name of the Entity	PAN	Years
59	Seema Kapoor	AERPK1243A	5
60	Sanjeev Sanghi	ABTPS2464C	5
61	Mahabir Pershad HUF	AAEHM5783L	5
62	Deepak Kumar Agarwal	ABSPA2276K	5
63	Sanjay Kapoor	AGCPK3754D	5
64	Sapna Kapoor	ACQPK3632A	5
65	Sunil Kapoor	AGCPK3755C	5
66	Ashok Kumar Maheshwari	AARPM1903H	5
67	Vivek Karwa	AJLPK0941J	5
68	Roopchandra Kumar	AAFHR3866J	5
69	Sabreen	APZPS5157G	5
70	Sanjay Kumar HUF	AAQHS9987L	5
71	Arun Kumar HUF	AAIHA4621B	5
72	Raj Kumar	AHAPK7548Q	5
73	Manish Maheshwari	AGRPM7399D	5
74	Mahak Maheshwari	AKKPM2866N	5
75	Sajan Kumar Agarwal	AAKPA5957G	5
76	Narender Kumar HUF	AAEHN5960N	5
77	Shubham Agarwal	AYXPA3158N	5
78	Ashish Agarwal	AIBPA5454B	5
79	Manish Kumar Garg	AFDPG9852J	1
80	Gagandeep Construction Company Pvt Ltd	AABCO6949E	1
81	Mahamani Tradelink Pvt Ltd	AAECK7329P	1
82	Kapeeshwar Vintrade Pvt Ltd	AAACP8592R	1
83	Arunavo Mukherjee	AASCS8936L	1
84	Rajesh Bhiani	ABFPB2297Q	1
85	Param Jeet Singh	ACOPS3609M	1
86	Santosh Kumar Agarwal	ABHPA5568M	1
87	Dynamic Credit Finance Pvt Ltd	AACCA7919H	1
88	Rishabh Agarwal	AHOPA7789B	1
89	Abhay Jain Huf	AAGHA6530F	1
90	Amit Jain	AADPJ4068Q	1
91	Vijay Shree Bihani	AEPPB8476A	1
92	Reena Jain	ADWPJ5808Q	1
93	Usha Jain	AAF PJ9933J	1
94	Rita Jain	AAECG7847E	1
95	Surendra Kumar Gupta	AAQPG0240E	1
96	Pawan Kumari Agarwal	ABOPA5019J	1
97	Girija Pandey	BEIPP7914K	1
98	Devshyam Stock Broking Pvt Ltd	AADCD8900A	1
99	Sanmati Goods Pvt Ltd	AAICS9154Q	1
100	Memori Vinimay Pvt Ltd	AAECM4771B	1

Sr. no	Name of the Entity	PAN	Years
101	Cube Trafin Pvt Ltd	AABCC0768M	1
102	Raj Vardhan Agarwal	AGHPD9092J	1

- b) Further, Mr. Manoj Kumar Agarwal (PAN: ACFPA8077Q) and Ms. Deepa Mittal (PAN: AGZPM0492K) are also prohibited from being associated with any listed company or a SEBI registered intermediary, in any capacity including as a Director and key managerial person, directly or indirectly, for a period of seven years.
- c) SEBI may initiate action, if any, against Legal Representatives of Mr. Nathu Lal Sharma in terms of applicable law.

The Order shall come into force with the 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**