

<b>Department: Investigation</b>	<b>Segment: All</b>
<b>Circular No: MSE/ID/13123/2023</b>	<b>Date : March 01, 2023</b>

**Subject: SEBI Order in the matter of Aptech Limited**

To All Members,

SEBI vide order no WTM/SM/IVD/ID13/24252/2022-23 dated February 28, 2023 has issued the following directions for the below mentioned noticees:

Sr. No.	Noticee No.	Noticee Name	PAN
1	6	Mr. Lashit Sanghvi	AAHPS6774J
2	7	Ms. Neha Lashit Sanghvi	ABWPS9204P

- The Noticee nos. 6 and 7 are restrained from accessing the securities market and further prohibited from buying, selling or otherwise dealing in securities, directly or indirectly in any manner whatsoever for a period of 1 year from the date of SEBI order;
- The Noticee nos. 6 and 7 are restrained from buying, selling or otherwise dealing in the securities of Aptech Limited, directly or indirectly in any manner whatsoever for a period of 2 years from the date of SEBI order.
- The Noticee nos. 6 and 7 shall disgorge the amount of notional profits of INR 4987276.05 and INR 4984885.90, respectively, along with simple interest @ 9%per annum from September 07, 2016 till the date of actual payment. The aforesaid amounts along with interest shall be remitted to Investor Protection and Education Fund (IPEF) as referred to in Section 11(5) of the SEBI Act, 1992, within 45 (forty five) days from the date of SEBI order and intimation may be forwarded to "Division Chief, Enforcement Department-1, DRA-4, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai-400 051".
- The Noticee nos. 6 and 7 are further directed to pay a penalty as detailed below within 45 (forty five) days from the date of service of SEBI order by way of crossed demand draft drawn in favour of "SEBI- Penalties remittable to Government of India", payable at Mumbai, or the online payment facility available on the website of SEBI: [www.sebi.gov.in](http://www.sebi.gov.in) on the following path, by clicking on the payment link /ENFORCEMENT → Orders → Orders of Chairman/Members → PAYNOW or at the link <https://siportal.sebi.gov.in/intermediary/AOPaymentGateway.html>
- The Noticee nos. 6 and 7 are directed to provide a full inventory of all assets held in his name, individually or jointly, 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, within 15 days from the date of receipt of SEBI order.

**Metropolitan Stock Exchange of India Limited**

The obligation of the aforesaid debarred Noticee nos. 6 and 7, in respect of settlement of securities, if any, purchased or sold in the cash segment of the recognized stock exchange(s), as existing on the date of SEBI Order, can take place irrespective of the restraint/prohibition imposed by SEBI Order only, in respect of pending unsettled transactions, if any. Further, all open positions, if any, of the Noticees debarred in the present Order, in the F&O segment of the stock exchanges, are permitted to be squared off, irrespective of the restraint/prohibition imposed by SEBI Order.

This 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](http://www.sebi.gov.in)] and ensure compliance.

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

**Vipul Vaishnav**  
**Assistant Vice President**