



ASSISTANT GENERAL MANAGER
INVESTIGATIONS DEPARTMENT

IVD/PM/VCL/31447/1/2018
November 14, 2018

NJD Capital Private Ltd.
(erstwhile Vakrangee Capital Pvt. Ltd)
Nandwana House, Compartment No. 21,
Plot 6/19, Marol Co-op Industrial Estate,
Marol, Andheri East, Mumbai, Maharashtra - 400059

Vakrangee Holdings Private Ltd.
Nandwana House, Compartment No. 21,
Plot 6/19, Marol Co-op Industrial Estate,
Marol, Andheri East,
Mumbai, Maharashtra - 400059

Dinesh Nandwana
8802 Heritage Hiranandani Garden,
Powai, Mumbai, Maharashtra - 400076

Dinesh Nandwana HUF
8802 Heritage Hiranandani Garden,
Powai, Mumbai, Maharashtra - 400076

Sir/Madam,

Sub: Investigation in the matter of trading activities of certain entities in the scrip of Vakrangee Ltd.

1. SEBI conducted an investigation into the trading activities of certain entities in the scrip of Vakrangee Ltd.
2. During the investigation, it was observed that pursuant to allotment of 2,50,00,000 equity shares of Vakrangee Ltd. on August 14, 2015 to NJD Capital Private Limited, the shareholding of NJD Capital Private Limited (erstwhile Vakrangee Capital Private Limited) increased from 3,89,86,220 shares (7.92% of share capital) as at quarter ended June 2015 to 6,49,86,220 shares (12.27% of share capital) on August 14, 2015. Further, the shareholding of promoter and promoter group had increased from

सेबी कार्यालय, प्लॉट नं. 6/19, 'मार्ल' को-ऑपरेटिव इंडस्ट्रियल एस्टेट, मारोल (पूर्व), अंधेरी पूर्व - 400 059.
दूरभाष : 2644 5930 / 4045 9930 (सहायकी. सं.), 2644 9000 / 4049 9000 (मुख्य) : 2644 5919 से 2644 9022 तक : www.sebi.gov.in

SEBI Bhawan, Plot No. 6/19, 'Marol' Co-op Industrial Estate, Marol (E), Mumbai - 400 059.
Tel.: 2644 5930 / 4045 9930 (Auxiliary Nos.), 2644 9000 / 4049 9000 (Main) : 2644 5919 to 2644 5922 Web : www.sebi.gov.in



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

19,51,76,514 shares (38.71% of share capital) as at the quarter ended June 2015 to
22,01,76,514 shares (41.61% of share capital) on August 14, 2015.

3. In terms of SEBI (PIT) Regulations, 2015 and SEBI (SAST) Regulations, 2011, NJD Capital Private Limited along with Vakrangee Holdings Private Ltd, Dinesh Nandwana and Dinesh Nandwana HUF (being members of promoter and promoter group) were required to make disclosures to the company/ stock exchanges in respect of the aforesaid transaction, within the timeframe specified thereunder. However, it was observed that there was a delay in intimating the same to the company and to the stock exchanges.
4. This matter has been viewed seriously and you are advised to be careful in future to avoid recurrence of such instances, failing which action may be initiated in accordance with the provisions of SEBI Act, 1992 and Rules and Regulations framed there under.

Yours faithfully,

PETER MARDI