



BEFORE THE ADJUDICATING OFFICER
SECURITIES AND EXCHANGE BOARD OF INDIA

[ADJUDICATION ORDER NO. Order/AK/DS/2026-27/32398-32400]

**UNDER SECTION 15-I OF THE SECURITIES AND EXCHANGE BOARD OF INDIA
ACT, 1992 READ WITH RULE 5 OF SEBI (PROCEDURE FOR HOLDING INQUIRY
AND IMPOSING PENALTIES) RULES, 1995, IN RESPECT OF:**

Noticee No.	Noticee Name	PAN
1	Navnit Gadoya	AQNPG4727F
2	Chiranggi Irish Shah	CACPS1824G
3	Surbhi Aggarwal	BNIPA1542D

In the matter of

Front Running by Navnit Gadoya, Chiranggi Irish Shah and Surbhi Aggarwal

1. Securities and Exchange Board of India (hereinafter referred to as “**SEBI**”) conducted investigation in the matter of Front Running by, inter alia, Navnit Gadoya (PAN: AQNPG4727F) (hereinafter referred to as “**Noticee 1**”), Chiranggi Shah (PAN: CACPS1824G) (hereinafter referred to as “**Noticee 2**”), and Surbhi Aggarwal (PAN: BNIPA1542D) (hereinafter referred to as “**Noticee 3**”). (Noticees 1, 2 and 3 shall, hereinafter, be collectively referred to as “**the Noticees**”) during the period beginning January 01, 2023 till October 31, 2023 (hereinafter referred to as “**investigation period**” / “**IP**”) for possible violation of the provisions of SEBI Act, 1992 (hereinafter referred to as “**the SEBI Act**”).

APPOINTMENT OF ADJUDICATING OFFICER

2. Upon being satisfied that the Noticees have violated applicable provisions, SEBI initiated adjudication proceedings against the Noticees u/s 15-I(1) of SEBI Act and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (hereinafter referred to as “**SEBI Adjudication Rules**”) r/w Section 19 of SEBI Act and appointed the undersigned as the Adjudicating Officer (**AO**), vide Order dated December 01, 2025 u/s 15-I(1) of the SEBI Act, and Rule 3 of SEBI Adjudication



Rules r/w Section 19 of the SEBI Act, to inquire into and adjudge u/s 15A(a) of SEBI Act, the alleged violation of Section 11C(3) of the SEBI Act by the Noticees.

SHOW CAUSE NOTICE, REPLY OF THE NOTICEE AND HEARING

3. Show Cause Notice (hereinafter referred to as “SCN”) dated December 30, 2025 was issued to the Noticees in terms of rule 4 of SEBI Adjudication Rules, to show cause as to why inquiry should not be held against them and why penalty, if any, be not imposed on them u/s 15A(a) of SEBI Act.
4. Summary of the allegation made in the SCN is as under:
 - 4.1. The Noticees were identified as suspected entities, as they had placed various orders ahead of the Big Clients during the IP.
 - 4.2. During IP, there were 38 alleged front-running (FR) instances in equity segment of NSE wherein it was observed that Noticees had allegedly front-run the trades of Big Clients in shares of Rajesh Exports Ltd and made a profit of Rs. 1.99 cr.
 - 4.3. During IP, the alleged front runners i.e. the Noticees, had traded through broker M/s. LFC Securities Pvt. Ltd. (hereinafter referred to as "LFC"). The orders of Big Clients were placed through Ventura Securities Ltd (hereinafter referred to as "Ventura"). Further, another Big Client has placed its order through MIB Securities India Pvt. Ltd (hereinafter referred to as "MIB").
 - 4.4. The Big Clients themselves placed their orders in the scrip of Rajesh Exports Ltd through telephonic call on broker's (Ventura) landline. At Ventura, Chandrakant Laxman Modak (dealer) was placing the orders for Big clients on broker terminal. The other Big Client is a Mauritius based FPI and had given trade related instructions in the scrip of Rajesh Exports Ltd during IP through Microsoft Team Chat Application provided by its broker MIB. At MIB, dealers namely, Hardik Jayendra Jani and Rupesh Himatlal Sanghavi were placing the orders for APMS on broker terminal. It was also observed that during IP all the Noticees had placed their orders using Internet Based Trading (“IBT”) facility through their broker in the alleged 38 FR instances.



- 4.5. It was observed that the Noticees were connected to each other through frequent call records, bank transactions, and identical Mac ID/IP addresses.
- 4.6. The common scrip days traded by Noticees with the Big Clients were in the range of 4 to 10 scrip days in the scrip of Rajesh Exports Ltd.
- 4.7. During the IP, day trading activities of Noticees were analyzed. It was observed that the Noticees, who were connected to each other, had collectively day traded on 38 unique scrips and earned net profit of Rs. 6,07,87,599.80/- out of which from day trading in Rajesh Exports Limited, they earned net profit of Rs. 4,06,17,184/-. Further, in 30 FR instances in Rajesh Exports Limited, they had collectively earned profit of Rs. 1.39 crore which is 22.98% of net profit made by them from day trading activities during IP.
- 4.8. In view of the above, certain information was sought from the Noticees. However, Noticee 1 did not submit its response to the information sought by the Investigating Authority (IA). Noticee 2 allegedly submitted incorrect information initially, and did not respond to further clarifications sought by the IA. Noticee 3 also allegedly submitted incorrect information initially, and later submitted vague reply without providing any clarification to the information sought.
- 4.9. Therefore, it was alleged that the Noticee have violated the provisions of Section 11C(3) of the SEBI Act.
5. The SCN dated December 30, 2025 was sent to the Noticees through Speed Post Acknowledgement Due (SPAD). It was duly delivered to Noticees 2 and 3, and returned undelivered from Noticee 1's address. Subsequently, the digitally signed SCN, along with annexures were delivered to Noticee 1 through email.
6. However, no reply was received from the Noticees. In the interest of natural justice, the Noticees were provided an opportunity of hearing on May 05, 2026, vide hearing notice dated February 17, 2026. The hearing notice was delivered to Noticees 2 and 3 through SPAD and digitally signed hearing notice was delivered to Noticee 1 vide email dated February 17, 2026. However, none of the Noticees



appeared for the hearing or submitted any response to the SCN. I note that no prejudice has been caused to the Noticees and that the principles of natural justice have been duly followed in the matter. I am, therefore, inclined to take a view that the Noticees have nothing to submit in the matter.

7. In this regard, I note that the Hon'ble SAT in the matter of Classic Credit Ltd. vs. SEBI (Appeal No. 68 of 2003 decided on December 08, 2006) has, inter alia, observed that, "*.....the appellants did not file any reply to the second show-cause notice. This being so, it has to be presumed that the charges alleged against them in the show cause notice were admitted by them*".
8. In view of the observations made by Hon'ble SAT, I find no reason to take a different view and accordingly, in terms of Rule 4(7) of SEBI Adjudication Rules, the matter is being proceeded ex-parte with respect to the Noticees, on the basis of material available on record.

CONSIDERATION OF ISSUES AND FINDINGS

9. Considering the allegations made out in the SCN, I find that following issues require consideration in the present case:
ISSUE I - Whether the Noticees have violated the provisions of Section 11C(3) of the SEBI Act?
ISSUE II - Do the violations, if any, attract penalty u/s 15A(a) of the SEBI Act, as applicable?
ISSUE III - If so, what should be the monetary penalty that can be imposed taking into consideration the factors mentioned in Section 15J of SEBI Act?
10. The said provisions under which violations are alleged against the Noticees are reproduced below –

Securities and Exchange Board of India Act, 1992

Investigation.

11C. (3) The Investigating Authority may require any intermediary or any person associated with securities market in any manner to furnish such information to, or produce such books, or registers, or other documents, or record before him or any person authorised



by it in this behalf as it may consider necessary if the furnishing of such information or the production of such books, or registers, or other documents, or record is relevant or necessary for the purposes of its investigation.

11. I now proceed to deal with the issues on merits as under:

ISSUE I - Whether the Noticees have violated the provisions of Section 11C(3) of the SEBI Act??

12. From the SCN, I note that the Noticees were alleged to have violated the provisions of Section 11C(3) of SEBI Act, as they had not provided information sought by the IA, or provided incorrect information and failed to comply with the summons issued by the IA..

Noticee 1 – Navnit Gadoya

13. The chronology of events with respect to the correspondence between SEBI and Noticee 1 are provided below:

Date of email	Particulars of email								
Dec 31, 2024	An email was sent to Front runner entity, Navnit Gadoya (Noticee 1) on Dec 31, 2024 for initial information regarding their trading in scrip of Rajesh Exports during IP in the present matter. Certain information was asked related to people involved in the placing order, mode of order placement, any relation with the broker through which trade were placed etc. However, no response was received.								
Jan 31, 2025	Subsequently, a reminder email was sent to Noticee 1.								
Feb 21, 2025	Subsequently, first summon dated Feb 21, 2025 for information was issued to Noticee 1. The details regarding his address and email id is mentioned below. However, no response was received from said Front runner entity. <table border="1"><thead><tr><th>S.N.</th><th>Name of runner</th><th>Email-id</th><th>Address</th></tr></thead><tbody><tr><td>1</td><td>Navnit Gadoya</td><td>ngadoya451@gmail.com ; bgadoya324@gmail.com</td><td>B 406 Yashodhan Building Bhau Saheb</td></tr></tbody></table>	S.N.	Name of runner	Email-id	Address	1	Navnit Gadoya	ngadoya451@gmail.com ; bgadoya324@gmail.com	B 406 Yashodhan Building Bhau Saheb
S.N.	Name of runner	Email-id	Address						
1	Navnit Gadoya	ngadoya451@gmail.com ; bgadoya324@gmail.com	B 406 Yashodhan Building Bhau Saheb						



Date of email	Particulars of email
	Bagwe Road Dahisar Bridge Mumbai- 400068
March 05, 2025	Considering no response was received from Noticee 1, second
April 04, 2025	

14. All the 3 Summons (digitally signed) were duly delivered vide emails, and the physical copy of Summon dated April 04, 2025 was also duly delivered to the address of Noticee 1. I also note that Noticee 1 was also informed vide the aforesaid summons that failure, without reasonable cause or refusing to furnish information and documents sought by the IA or filing false or incorrect or incomplete information may lead to initiation of adjudication proceedings against Noticee 1, under which he may be liable for penalty under section 15A(a) of SEBI Act.

15. I note that Noticee 1, vide email dated December 03, 2025, has provided his response to the summons dated February 21, 2025 and March 05, 2025. I find that the delay in submitting the response is not reasonable, as it was submitted after more than 9 months. By then, the investigation was concluded, enforcement action for non-compliance of summons was approved and the undersigned was appointed as the AO, vide Order dated December 01, 2025. Also, Noticee 1 has not provided any reasons for delay in submitting his response.



16. I note from the material on record that Noticee 1 had frequent calls and bank transactions with other Noticees. Further, identical MAC/IP addresses were found in the order placement records of the Noticees, which also indicated that the Noticees were known to each other. I also note that Noticee 1 executed significant trades in cash market in the same scrip and on the same days on which Mr. Sandeep (Big Client) had placed orders. Profits earned by Noticee 1 from transaction on the same scrip days as that of Mr. Sandeep contributed to 27.65% of the total profits earned by the Noticee during the IP. Thus, the information sought from Noticee 1 was crucial for investigating the matter.

17. However, Noticee 1 failed to submit any response to the information sought from him and also failed to produce information sought vide summons dated February 21, 2025 and March 05, 2025. Therefore, I find that Noticee 1 did not cooperate during investigation proceedings and did not provide information despite multiple opportunities, hampering the investigation process of gathering information to establish his connection with other Noticees and Big Clients in the instant matter, thereby delaying the whole investigation proceedings.

Noticee 2 - Chiranggi Irish Shah

18. I note that SEBI had requested information from Noticee 2, through multiple emails (email dated December 31, 2024, and January 31, 2025) and summons (summons dated February 21, 2025, and March 05, 2025). However, on March 12, 2025, she had submitted partial reply in which she had explicitly denied any relationship with other front-running entities, including JNSP, and Noticees 1 and 3, claiming she had *never heard the name before in her life*.

19. However, it was observed that Noticee 2 was connected to other Noticees by way of frequent call records, bank transactions, and identical MAC/IP addresses for placement of orders. Thus, it was observed that Noticee 2 had submitted incorrect information to SEBI. Vide email dated September 15, 2025 an opportunity was provided to Noticee 2 to provide clarification regarding her connection with



Noticees 1 and 3. However, Noticee 2 did not submit any response. The content of said SEBI email dated September 15, 2025 has been given below-

“This communication refers to correspondence with you (through SEBI summonses dated Feb 21, 2025; March 05,2025 and emails dated Dec 31, 2024; Jan 31, 2025) regarding your connection with entities Mr. Navnit Gadoya and Ms. Surbhi Aggarwal. Investigation has revealed connections between you and the aforementioned entities through frequent call records, bank transactions, and an identical Mac ID/IP addresses.

On account of above, you are again directed to submit your relation with Mr. Navnit Gadoya and Ms. Surbhi Aggarwal, if any, by 17/09/2025, failing which your below mentioned submissions dated 12/03/2025, would be taken on record and it would be presumed that you have provided wrong information to SEBI”.

20. Thus, Noticee 2 initially did not submit any response to the emails, and later after issuance of two summons, she provided incorrect information to the IA. Upon seeking further clarification, Noticee 2 did not submit any response.

21. Therefore, I find that Noticee 2 did not cooperate during investigation proceedings and did not provide information despite multiple opportunities, hampering the investigation process of gathering information to establish her connection with other Noticees and Big Clients in the instant matter, thereby delaying the whole investigation proceedings.

Noticee 3 - Surbhi Aggarwal

22. SEBI had requested information from Noticee 3 through multiple emails (email dated December 31, 2024, and January 31, 2025) and summons (summons dated February 21, 2025, March 05, 2025 and April 04, 2025). However, on October 29, 2025, in her partial reply to the information sought, she explicitly denied any relationship with JNSP and other Noticees, claiming that *“I do not have relationship with them”*.

23. However, from the evidence available on record, it was observed that she was connected with other Noticees by way of Common directorship at Weiz Mann



Securities Pvt Ltd, calls records, bank transactions, and identical MAC/IP addresses for placement of orders in the scrip of Rajesh exports. Vide email dated October 30, 2025 an opportunity was provided to Noticee 3 to provide clarification regarding her incorrect submissions on her connection with Noticees 1 and 2. However, vide email dated November 03, 2025, she had submitted a vague reply to the query of SEBI without providing any clarification regarding her connection with Noticees 1 and 2.

24. Thus, Noticee 3 had submitted incorrect information to SEBI vide email dated October 29, 2025 and submitted a vague reply vide email dated November 03, 2025.

25. Therefore, I find that Noticee 3 did not cooperate during investigation proceedings and did not provide information despite multiple opportunities, hampering the investigation process of gathering information to establish her connection with other Noticees and Big Clients in the instant matter, thereby delaying the whole investigation proceedings.

26. I am of the view that it is the duty, responsibility and obligation of every person from whom information is sought to fully co-operate with SEBI and promptly produce all documents, records, information, etc. If the summons issued by SEBI are allowed to be flouted and not taken seriously, SEBI, as the market regulator will not be able to discharge its statutory obligations in protecting the interests of the investors and safeguarding the integrity of the securities market. Had the Noticees complied with the summons and provided the factual information at the appropriate time, SEBI would have been in a better position to investigate the matter. As the Noticees did not provide the requisite information and either did not respond to the summons or provided incorrect information, their defiant conduct has certainly thwarted the attempt by SEBI to gather further evidence for a timely conclusion of the investigation proceedings. I further observe that the information sought was very significant and relevant, which would have enabled to draw precise conclusions in



the matter especially with respect to their connections within themselves and with the Big Clients.

Based on the above, I find that the allegation of violation of provisions of Section 11C(3) of SEBI Act against Noticees 1, 2 and 3 stands established.

ISSUE II - Do the violations, if any, attract penalty u/s 15A(a) of the SEBI Act?

27. I note that since the above violations are established, the Noticees are liable for monetary penalty u/s 15A(a) of the SEBI Act, as applicable, the text of which is reproduced hereunder:

SEBI Act

Penalty for failure to furnish information, return, etc.

15A. If any person, who is required under this Act or any rules or regulations made thereunder,—

(a) to furnish any document, return or report to the Board, fails to furnish the same or who furnishes or files false, incorrect or incomplete information, return, report, books or other documents, he shall be liable to a penalty which shall not be less than one lakh rupees but which may extend to one lakh rupees for each day during which such failure continues subject to a maximum of one crore rupees;

ISSUE III - If so, what would be the monetary penalty that can be imposed taking into consideration the factors mentioned in Section 15J of SEBI Act?

28. While determining the quantum of penalty u/s 15A(a) of the SEBI Act, it is important to consider the factors stipulated in Section 15J of the SEBI Act, which read as under:

SEBI Act

15J While adjudging quantum of penalty under section 15-I, the adjudicating officer shall have due regard to the following factors, namely

(a) the amount of disproportionate gain or unfair advantage, wherever quantifiable, made as a result of the default;

(b) the amount of loss caused to an investor or group of investors as a result of the default;

(c) the repetitive nature of the default.



29. In the present matter, I note that Noticees 1, 2 and 3 hampered the gathering of information during the course of investigation by not responding to the summons and failing to furnish information to the IA. No quantifiable figures in respect of disproportionate gain or unfair advantage made as a result of the defaults by the Noticees have been established. Further, from the material available on record, it is not possible to ascertain the exact monetary loss to the investors on account of default by the Noticees. As per the available records, I note that the Noticees have not been penalised earlier u/s 15A(a) of SEBI Act. I am of the view that suitable penalty must be imposed for non-compliances in order to ensure that the violations can be prevented in future.

ORDER

30. Having considered all the facts and circumstances of the case, the material available on record, and the factors mentioned in Section 15J of the SEBI Act, in light of judgment of the Hon'ble Supreme Court in SEBI vs. Bhavesh Pabari (2019) 5 SCC 90, in exercise of power conferred u/s 15-I of the SEBI Act r/w Rule 5 of the SEBI Adjudication Rules, I impose the following penalty upon the Noticees for the violations as mentioned hereunder.

Noticee No.	Name of Noticee	Provisions violated	Penalty under	Penalty Amount
1	Navnit Gadoya	Section 11C(3) of SEBI Act	Section 15A(a) of SEBI Act, 1992	Rs. 5,00,000/- (Rs. Five Lakh Only)
2	Chiranggi Irish Shah			Rs. 5,00,000/- (Rs. Five Lakh Only)
3	Surbhi Aggarwal			Rs. 5,00,000/- (Rs. Five Lakh Only)

I find the said penalty to be commensurate with the violation on the part of the Noticees.

31. Noticees shall remit / pay the said amount of penalty within 45 days of receipt of this order through online payment facility available on the website of SEBI, i.e. www.sebi.gov.in on the following path, by clicking on the payment link:



ENFORCEMENT → Orders → Orders of AO → PAY NOW.

32. In the event of failure to pay the said amount of penalty within 45 days of the receipt of this Order, SEBI may initiate consequential actions including but not limited to recovery proceedings u/s 28A of the SEBI Act for realization of the said amount of penalty along with interest thereon, *inter alia*, by attachment and sale of movable and immovable properties.

33. In terms of Rule 6 of the SEBI Adjudication Rules, copy of this order is sent to the the Noticees and also to SEBI.

DATE: APRIL 29, 2026

PLACE: MUMBAI

**AMIT KAPOOR
ADJUDICATING OFFICER**