

INSOLVENCY AND BANKRUPTCY BOARD OF INDIA
(Disciplinary Committee)

No. IBBI/DC/329/2026

03 July 2026

ORDER

This Order disposes of the Show Cause Notices (SCN) No INSINV-13011/2/2025-IBBI/1821/1575 dated 30.09.2025 (SCN-1) and SCN No. COMP-11012/64/2026-IBBI-1915/318 dated 30.03.2026 (SCN-2) issued to Mr. Chandra Prakash Jain, who is an Insolvency Professional (IP) registered with the Insolvency and Bankruptcy Board of India (IBBI/Board) having Registration No. IBBI/IPA-001/IP-P00147/2017-2018/10311 and a Professional Member of the Institute of the Chartered Accountants of India ICAI (IIIP-ICAI).

1. Background

- 1.1 In the matter of SCN-1, M/s Accura Productions Pvt. Ltd (CD-8) was admitted to corporate insolvency resolution process (CIRP) by the National Company Law Tribunal, Mumbai Bench (AA) *vide* its order dated 19.07.2024 on an application filed by Reliance Commercial Finance Limited being Financial Creditor, under Section 7 of the Insolvency and Bankruptcy Code, 2016 (IBC/Code) and Truee IPE LLP was appointed as the Interim Resolution Professional (IRP) and later confirmed as the Resolution Professional (RP) in the matter. Mr. Chandra Prakash Jain acted as the authorised partner of the said IPE in this matter. The Board in exercise of powers under Section 219 of the Code read with Regulation 10A, Regulation 11(2) and Regulation 12 of the IBBI (Inspection and Investigation) Regulations, 2017 (Inspection and Investigation Regulations) formed a *prima facie* view on the basis of material available on record that Mr. Chandra Prakash Jain had violated the provisions of the Code and Regulations made thereunder and issued SCN-1 to Mr. Chandra Prakash Jain on 30.09.2025. Mr. Chandra Prakash Jain submitted his reply to the SCN-1 on 15.10.2025.
- 1.2 In the matter of SCN-2, the Board had received a complaint against Mr. Chandra Prakash Jain in the matter of voluntary liquidation process of the CD-12. The copy of the complaint was shared with Mr. Chandra Prakash Jain *vide* email dated 06.10.2025 thereby seeking reply of Mr. Chandra Prakash Jain to the allegations in the complaint. Mr. Chandra Prakash Jain submitted his reply *vide* email dated 13.10.2025. Subsequently, additional information/documents were sought *vide* email dated 14.01.2026 which were submitted by Mr. Chandra Prakash Jain on 15.01.2026. The Board examined the allegations raised in the complaint vis-à-vis reply of Mr. Chandra Prakash Jain and material available on record.
- 1.3 In the matter of SCN-2, the Board observed certain similarities in the CIRP of the 10 CDs, which *prima facie* indicated irregularities not only in the initiation of the CIRPs but also in conduct of the CIRPs. The details are abstracted in the following table :-

Sr.	Corporate Debtor/ CD	CoC composition	Insolvency Commencement Date (ICD)	Applicant initiating CIRP	Successful Resolution Applicant	Current status
1	Celebrita Mediahouse Private Limited (CD-1)	Reliance Commercial Finance Limited (RCFL)	08.05.2024	Reliance Commercial Finance Limited)	Micro Capitals Pvt. Ltd.	Resolution Plan is pending before the AA. Next date of hearing is 24.07.2026.
2	RPL Star Power Private Limited (CD-2)	Authum Investment & Infrastructure Limited (AAIL)	15.10.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution plan is pending before the AA. Next Date of hearing is 28.08.2026
3	Arion Movie Production Private Limited (CD-3)	AAIL earlier RCFL	19.07.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution Plan is pending before the AA. Next date of hearing is 24.07.2026.
4	Azalia Distribution Private Limited (CD-4)	AAIL	06.09.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution plan is pending before the AA. Next Date of hearing is 14.08.2026.
5	Hirma Power Limited (CD-5)	AAIL (Secured FC)-& Azalia Distribution Pvt. Ltd.	03.10.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution plan is pending before the AA. Next Date of hearing is 23.07.2026.

6	Tulip Advisors Private Limited (CD-6)	RCFL	27.06.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution plan is pending before the AA Next Date of hearing is 02.07.2026.
7	Thwink Big Content Private Limited (CD-7)	AILL & Invent Assets Securitisation & Reconstruction Pvt. Ltd.	26.07.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution plan is approved <i>vide</i> AA order dated 25.09.2025
8	Accura Productions Private Limited (CD-8)	AILL	19.07.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution Plan approved <i>vide</i> AA order dated 06.08.2025.
9	Pifiniti Movies Private Limited (CD-9)	RCFL	12.06.2024	Reliance Commercial Finance Limited)	Micro Capitals Pvt. Ltd.	Resolution plan approved <i>vide</i> AA order dated 25.09.2025.
10	Edrishti Movies Private Limited (CD-10)	RCFL	08.07.2024	Reliance Commercial Finance Limited	Micro Capitals Pvt. Ltd.	Resolution plan is pending before the AA. Next Date of hearing is 29.07.2026.

1.4 In the CIRPs of aforementioned ten CDs and also in the CIRP of Triumvirate Sorority Private Limited (CD-11) which had commenced *vide* an order dated 21.11.2023 of the AA where Truee IPE LLP bearing IP Registration No. IBBI/IPE-0151/IPA-1/2023-24/50052 was appointed as the IRP and subsequently confirmed as RP where Mr. Chandra Prakash Jain acted as the authorized signatory on behalf of the Insolvency Professional Entity which was appointed as IRP/RP in these ten CIRPs.

1.5 In the matter of Transmissions International India Pvt. Ltd (CD-12), voluntary liquidation process had commenced on 22.02.2024 and Mr. Umesh Harjivandas Ved was initially

appointed as the Liquidator. Subsequently, Mr. Chandra Prakash Jain was appointed as the liquidator in the said process on 18.09.2024.

- 1.6 The Board in exercise of its powers under Section 219 of the Code read with Regulation 10A, Regulation 11(2), Regulation 12 of Inspection and Investigation Regulations had formed a prima facie view on the basis of material available on record that Mr. Chandra Prakash Jain had violated the provisions of the Code and Regulations made thereunder and issued the SCN-2 to Mr. Chandra Prakash Jain on 30.03.2026. Mr. Chandra Prakash Jain submitted his reply to SCN-2 on 06.05.2026.
- 1.7 The SCN-1 and SCN-2 and responses thereto of Mr. Chandra Prakash Jain were referred to the Disciplinary Committee (DC) for disposal. Mr. Chandra Prakash Jain availed the opportunity of personal hearing before the DC through virtual mode on 18.06.2026.

2. Alleged Contraventions, Submissions of Mr. Chandra Prakash Jain and Findings of the DC.

The contraventions alleged in the SCNs, replies to the SCNs, submissions during the personal hearing by Mr. Chandra Prakash Jain and the analysis and the findings of the DC are summarized in the following paragraphs: -

Contraventions under SCN-1

(In the matter of M/s Accura Productions Pvt. Ltd (CD-8))

Contravention-I

2.1 Failure to disclose carry forward losses in Form H

- 2.1.1 Regulation 39(4) of IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016 (CIRP Regulations) specifies that the RP shall endeavour to submit the resolution plan approved by the Committee of Creditors (CoC) to the AA at least fifteen days before the maximum period for completion of CIRP under Section 12, along with a compliance certificate in Form-H of the Schedule-I and the evidence of receipt of performance security required under sub-regulation (4A) of Regulation 36B of CIRP Regulations. It was observed from the minutes of the 8th CoC meeting held on 24.01.2025 that while presenting observations on the resolution plan, Mr. Chandra Prakash Jain stated as under:

"The PRA has given an offer of 28 lakh to Secured Creditors; however, as per our observation, the carried forward loss in the books of accounts of the CD is approx. 581.80 crore which might give substantial tax benefits in future to the PRA. Hence, this factor should be considered by the PRA..."

- 2.1.2 Mr. Chandra Prakash Jain had acknowledged significant carried forward losses in the CD-8's accounts, which could potentially translate into material tax benefits for the resolution applicant. On the other hand, Form H submitted by Mr. Chandra Prakash Jain showed the carry forward income tax losses as 'Nil'. The said form also contained a declaration that the

contents of the certificate were true and correct to the best of his knowledge and belief, and that nothing material was concealed. However, despite the acknowledgment by Mr. Chandra Prakash Jain in the CoC minutes about the carried forward losses, there was no disclosure of this material fact in the Form-H. Hence, Mr. Chandra Prakash Jain furnished incorrect and misleading information in Form-H by concealing a material fact on carried forward losses. In view of the above, it was observed that Mr. Chandra Prakash Jain had *prima facie* contravened provisions of Regulation 39(4) of the CIRP Regulations read with Clause 2 of the Code on Conduct provided under Schedule-I of the IBBI (Insolvency Professional) Regulations, 2016 (Code of Conduct).

2.2 Submissions by Mr. Chandra Prakash Jain.

2.2.1 Mr. Chandra Prakash Jain submitted that there were No Carried Forward Losses as per Income Tax Records. As per the latest Income Tax Returns filed by the CD-8 for AY 2024-2025 there was no carried forward income tax losses available. The CD-8 had no business operations during the relevant assessment years, and accordingly, no such losses was recognized or carried forward under the provisions of the Income Tax Act, 1961. Hence, carry forward losses was mentioned as Nil. Mr. Chandra Prakash Jain submitted that the statement made in the 8th CoC meeting dated 24.01.2025 referred to losses reflected in the books of accounts of the CD-8 and not to income tax losses. The said figure of approximately Rs.581.80 crore represented the accumulated accounting losses (negative net worth) as per audited financial statements. He further submitted that Regulation 39(4) of the CIRP Regulations and Form H require disclosure of carry forward income tax losses, i.e., those eligible for set-off under the Income Tax Act, 1961. Since no such tax losses existed as per the relevant ITR, the entry in Form H was correctly shown as 'Nil'. The mentioning of accounting losses before the CoC in the 8th meeting was made transparently for consideration of the CoC members in the context of valuation and future tax implications to the Resolution Applicant. The two disclosures-accounting losses in CoC minutes and 'Nil' carried forward tax losses in Form H-pertain to distinct contexts and are factually consistent and hence there was no violation of the Code, Rules or Regulations in this regard.

2.3 Analysis and Findings of the DC.

2.3.1 The DC notes that Mr. Chandra Prakash Jain, in Form-H, disclosed under Clause 10 (Details of Income Tax losses carry forward under Section 79(2)(c) of the Income Tax Act, 1961) as 'NIL' submitting that there were no income tax losses available for carry forward.

2.3.2 The DC also notes that Mr. Chandra Prakash Jain in the 8th CoC Meeting had submitted before the CoC Member that there was approximately Rs. 581.80 crore carried forward losses which might give substantial tax benefits to the PRA.

2.3.3 However, in response to the SCN, Mr. Chandra Prakash Jain submitted that "...*The Corporate Debtor had no business operations during the relevant assessment years, and accordingly, no such losses have been recognized or carried forward under the provisions of the Income Tax Act, 1961. Hence carry forward losses was mentioned as Nil I say that the statement made in*

the 8th CoC meeting dated 24.01.2025 referred to losses reflected in the books of accounts of the corporate Debtor, not to income tax losses. The said figure of approximately Rs.581.80 crores represented the accumulated accounting losses (negative net worth) as per audited financial statements.”

2.3.4 The DC views that the purpose of disclosure under Form-H read with Regulation 39(4) of the CIRP Regulations is to place before the AA and all stakeholders complete and material information relevant to the resolution process, including any tax benefits that may accrue to the Prospective Resolution Applicant (PRA). Merely stating that no carried forward loss was reflected in the latest Income Tax Return does not fully disclose the fact that substantial accumulated losses continued to exist in the books of accounts and may, subject to fulfilment of the statutory conditions under the Income Tax Act, 1961, be available to the successful Resolution Applicant for claiming tax benefits in the future. Such accumulated losses were relevant because these represent the potential availability of tax benefits upon satisfaction of the conditions prescribed under the Income Tax Act, including those relating to companies undergoing insolvency resolution.

2.3.5 Therefore, the disclosure of "Nil" against carried forward income tax losses in Form-H was incomplete and liable to create an incorrect impression that no tax-related loss or tax benefit was associated with the CD-8. At the very least, the accumulated losses of approximately Rs.581.80 crore, together with an appropriate clarification that their eventual tax utilisation would be subject to the provisions of the Income Tax Act, 1961, ought to have been disclosed in Form-H to ensure full and fair disclosure of all material particulars relevant to the CIRP. Accordingly, the DC holds the contravention.

Contravention-II.

2.4 Failure to Ensure Proper Valuation of CD's Assets.

2.4.1 Section 18(a) of the Code provides for the IRP to collect all information relating to the assets, finances and operations of the CD for determining the financial position of the CD. Further, Section 19(2) of the Code provides that "*Where any personnel of the corporate debtor, its promoter or any other person required to assist or cooperate with the interim resolution professional does not assist or cooperate, the interim resolution professional may make an application to the Adjudicating Authority for necessary directions*".

2.4.2 It was observed by the Board that the valuation reports submitted by two registered valuers (RVs) appointed in the matter, namely Mr. Mohit R. Tibrewala and Mr. Saurabh Rajesh Shah, reflected the exact same fair value and liquidation value. On examination of valuation reports, it was observed that Mr. Mohit R. Tibrewala valued the loans and advances of Rs.494.98 crore at 'Nil', on the ground that no supporting documents were made available. Similarly, Mr. Saurabh Rajesh Shah valued the trade receivables of Rs.4.13 lakh at Nil, on the ground that no details were provided to him. Further, no valuation of loans and advances amounting to Rs.494.98 crore, was observed to be captured in the report of Mr. Saurabh Rajesh Shah. Despite both RVs highlighting non-availability of information, Mr. Chandra Prakash Jain

failed in his duty to take effective steps to secure the requisite information from the suspended management to enable proper valuation of the CD-8's assets. Instead, Mr. Chandra Prakash Jain placed incomplete valuation reports before the CoC and facilitated approval of the resolution plan without ensuring that the CD-8's assets were approximately valued.

2.4.3 It was further observed that in the 9th CoC meeting held on 11.03.2025, Mr. Chandra Prakash Jain submitted that despite numerous reminders, there was no cooperation from the suspended management, and the only remaining course of action was to initiate legal proceedings for non-cooperation. A similar statement was made in the 10th CoC meeting held on 05.05.2025. This *prima facie* indicated that Mr. Chandra Prakash Jain failed to file an application under Section 19(2) of the Code seeking directions from the Adjudicating Authority to secure requisite information before valuation of the assets of the CD-8.

2.4.4 In view of the above, it was observed that Mr. Chandra Prakash Jain had failed to provide requisite information to the RVs leading to inadequate and flawed valuation of the CD-8's assets. This culminated in the acceptance of a resolution plan of only Rs.20 lakh against admitted claims of more than Rs.500 crore, thereby causing significant prejudice in the resolution process. Hence in Board's *prima facie* view Mr. Chandra Prakash Jain had contravened the provisions of Section 18(a) and 18(2) read with Clause 13 and 14 of the Code of Conduct.

2.5 Submissions by Mr. Chandra Prakash Jain.

2.5.1 Mr. Chandra Prakash Jain submitted that he made requests to the suspended management and key personnel to provide details and documents relating to loans, advances, and trade receivables. The management had been co-operating and providing the document and information. He further submitted that therefore, the issue of non-cooperation did not arise, as the suspended management had extended cooperation and provided all available documents and information required for the valuation exercise. The same was transparently placed before the CoC in its meetings held on 11.03.2025 and 05.05.2025. The CoC, in its commercial wisdom, being fully informed of the valuation exercise and the basis adopted by the valuers, decided to proceed with the resolution process in order to ensure timely completion and prevent value deterioration.

2.5.2 Mr. Chandra Prakash Jain also submitted that Section 19(2) Application had not been filed by him as there was no occasion to invoke Section 19(2) of the Code, as the suspended management, though slow in responding, extended cooperation and ultimately provided the maximum available records and documents required for the valuation exercise. The delay in receiving certain information was procedural in nature and not indicative of any deliberate non-cooperation. The issue of non-cooperation mentioned in the minutes of the 9th and 10th CoC meetings held on 11.03.2025 and 05.05.2025 respectively pertained specifically to delays faced during the forensic audit exercise and not in relation to the valuation of assets. These delays were procedural in nature and arose due to time taken by the suspended management in retrieving historical data and old records required for the forensic audit.

2.5.3 Mr. Chandra Prakash Jain further submitted that he had provided all documents and records as required for valuation to the valuers within the stipulated timelines. This is explicitly corroborated in the valuation reports, wherein it is categorically recorded that the RP had provided all necessary documents required for the valuation exercise. The allegation regarding non-valuation of loans and advances amounting to Rs.494.98 crore, as mentioned in the valuation report submitted by Mr. Saurabh Rajesh Shah, is also denied in its entirety. It was submitted that the said valuer, based on the records and information available, reported only those assets which were valued, and those assets having no value were not mentioned. In contrast, in the valuation report submitted by Mr. Mohit R. Tibrewala, a specific line item was included for loans and advances, which was also valued as 'NIL'. The difference between the two reports was only in the manner of presentation and not in substance. Therefore, it cannot be inferred or alleged that he had failed to provide requisite information to the valuers or had not ensured proper valuation of the Corporate Debtor's assets.

2.6 Analysis and Findings of the DC.

2.6.1 The DC notes that in the Valuation Report, submitted by the valuer Mr. Mohit Tibrewala it was mentioned that loan and advance of Rs. 494.98 crore along with interest receivable of Rs.8.47 crore were valued at “NIL” due to non-receipt of documents by Mr. Chandra Prakash Jain from the suspended management of the CD-8. The relevant extract of the valuation report is reproduced below: -

“ ...

Net Asset Value (NAV) Method

For the purpose of valuing the Financial Assets of the Company, we have used this method as the Company being in CIRP, being riskier in nature and exact / probable outcome is not known, as informed / deliberated with the IRP. Hence we have valued the Company using this method.

The some investments made by the Company in the Equity of other company are also into CIRP. The company had given loan and advance to its certain corporates amounting to Rs. 49498.62 Lakhs and interest receivable Rs. 847.86 lakhs, there were no supporting documents found by the IRP from the suspended Management regarding the same. Since the Company is also into CIRP, the recovery of the same is doubtful to that extent. Further the Trade Receivable of Rs. 4.13 Lakhs is as informed to us by the IRP, the amount recoverable from them is also grim. The Company submits that due certain unforeseen circumstances owing to the downturn in the print and media business space which was further compounded by the world wide Covid - 19 pandemic, the Bank Balance and balance with Government securities are taken at book value. The investments made by the Company which not under CIRP are also taken at book value. Inter corporate deposits, debtors and interest receivable are taken as NIL.”

2.6.2 The DC notes a contradiction between the submissions made by the RP, Mr. Chandra Prakash Jain, and the factual recorded evidence contained within the valuation reports and Minutes of the CoC meetings. While Mr. Chandra Prakash Jain contends that the suspended management

was fully cooperative and had provided all available records required for the valuation exercise, the structural reality of the valuation reports completely contradicts his submission. The Valuation Report submitted by the RV, Mr. Mohit Tibrewala, explicitly attributes the "NIL" valuation of a massive asset block comprising of loans and advances of Rs.494.98 crore and interest receivables of Rs.8.47 crore directly to the non-availability and non-receipt of supporting documentation from the suspended management. Moreover, it is the RP who chairs the CoC meeting. So he cannot hide behind the arrangement of the commercial wisdom of CoC for non-performance of his duty of obtaining information regarding the CD-8 and forwarding it to the RVs for appropriate valuation of the CD-8.

2.6.3 The DC notes that loans and advances worth Rs.494.98 crore constitute a considerable portion of the CD-8 financial matrix. Accepting a "NIL" valuation for an asset class of this magnitude solely due to a lack of documentation without exhausting statutory remedies reflects a gross dereliction of the RP's duty. By placing incomplete, information-starved valuation reports before the CoC, the RP failed to provide the creditors with a true and fair view of the liquidation and fair values of the CD-8. Facilitating the approval of a resolution plan based on unverified "NIL" values for hundreds of crore of assets, defeats the core objective of maximizing asset value under the Code. The minutes of the 9th and the 10th CoC meetings (held on 11.03.2025 and 05.05.2025) explicitly record the RP stating that there was "no cooperation from the suspended management" and that initiating legal proceedings was the only course left. Despite identifying this persistent non-cooperation to the CoC, Mr. Chandra Prakash Jain failed to file an application under Section 19(2) before the AA to secure the production of these vital documents. Consequently, the DC finds that Mr. Chandra Prakash Jain has acted with gross negligence. By failing to take effective, legally mandated steps to secure asset documentation, the RP has violated Section 19(2) of the Code along with the relevant regulations governing professional conduct.

2.6.4 The DC further observes that, as a consequence of Mr. Chandra Prakash Jain's failure to obtain the relevant documents from the suspended directors of the Corporate Debtor, the entire valuation exercise was rendered fundamentally flawed. Despite such deficiencies, Mr. Chandra Prakash Jain proceeded to place and approve a resolution plan for a value of Rs. 20 lakh against admitted claims amounting to Rs.500 crore. Such conduct of the RP defeated the objective of value maximisation of the assets of the CD-8, as stated under the Code. Accordingly, the DC holds the contravention.

Contraventions under SCN-2

Contravention-I.

2.7 Failure to take steps despite availability of significant information pointing towards syndicated fraudulent/ malicious initiation of proceedings in the matter of above stated 10 CDs.

2.7.1 Section 25(2)(j) of the Code provides that it shall be the duty of the RP to preserve and protect the assets of the CD, including the continued business operations of the CD, for the purpose of which the RP shall file application for avoidance of transactions in accordance with Chapter

III of the Code. Further, Section 65(1) of the Code provides that if, any person initiates the insolvency resolution process or liquidation proceedings fraudulently or with malicious intent for any purpose other than for the resolution of insolvency, or liquidation, as the case may be, the AA may impose upon such person a penalty which shall not be less than one lakh rupees, but may extend to one crore rupees.

2.7.2 Regulation 35A of CIRP Regulations provides that on or before the seventy-fifth day of the Insolvency Commencement Date (ICD), the RP shall form an opinion whether the CD has been subject to any transaction covered under Sections 43, 45, 50 or 66 of the Code and where the RP is of the opinion that the CD has been subjected to any transactions covered under these provisions, then he shall make a determination before the one hundred fifteenth day of the ICD and file an application before the AA for appropriate relief on or before the one hundred and thirtieth day of the ICD.

2.7.3 Regulation 40B of CIRP Regulations read with IBBI Circular No. IBBI/CIRP/85/2025 dated 26.05.2025 (modified forms), requires an IRP/RP to report progress of the CIRP through specified forms on the electronic platform of the Board, as per the timelines stipulated against each Form to facilitate monitoring of the CIRP. As per erstwhile Regulation 40B(1B) of the CIRP Regulations, the IRP/RP is required to intimate details of his opinion and determination under Regulation 35A on or before one hundred and fortieth day of the ICD, through filing of Form CIRP 8.

A. Initiation and Conduct of Systematically Coordinated CIRPs

2.7.4 It was observed by the Board that the aforesaid ten CIRPs handled or being handled by Mr. Chandra Prakash Jain exhibited certain common features. These include, *inter alia*, CDs having limited or no active business operations, absence of meaningful assets or cash flows, and in several instances, negative or negligible net worth. The financial structure of these entities appeared to involve significant borrowing and lending transactions among related or group entities. It was further noted that the CIRPs were initiated by a common financial creditor, involve largely overlapping Committee of Creditors (CoC) composition, and resulted in resolution plans reflecting substantial haircuts with relatively low realisations for the creditors.

2.7.5 A summary of key details of the aforesaid ten CIRPs is provided in the following table:

Table: Table: Details of Ten CIRPs (Initiation and Conduct of Systematically Coordinated CIRPs)											
Name of the CD	Celebrity Mediahouse Pvt. Ltd.	RPL Star Power Pvt. Ltd.	Arion Movie Production Pvt. Ltd.	Azalia Distribution Pvt. Ltd.	Hirma Power Limited	Tulip Advisors Pvt. Ltd.	Thwink Big Content Pvt. Ltd.	Accura Productions Pvt. Ltd.	Pifiniti Movies Private Limited	Edrishti Movies Pvt. Ltd.	
	CD-1	CD-2	CD-3	CD-4	CD-5	CD-6	CD-7	CD-8	CD-9	CD-10	
ICD	08.05.2024	15.10.2024	19.07.2024	06.09.2024	03.10.2024	27.06.2024	26.07.2024	19.07.2024	12.06.2024	08.07.2024	
Name of the Applicant	Reliance Commercial Finance Limited (RCFL)										
Name of the RP	Mr. Chandra Prakash Jain [IP registration No IBBI/IPA-001/IP-P00147/2017-2018/10311]										
Name of the IRP	Truee IPE LLP [IP Registration No. 1BBI/IPE-0151/IPA-1/2023-24/50052J Designated Partner - Mr. Chandra Prakash Jain [IP Registration No. IBBI/IPA-001/IP-P00147/2017-2018/10311]										
Stage of process	Application seeking approval of resolution plan is sub judice before AA						Resolution Plan approved by AA on 25.09.2025	Resolution Plan approved on 06.08.2025	Resolution Plan approved on 25.09.2025	Application seeking approval of resolution plan pending before AA	
CoC Constitution	RCFL (Secured FC) – 100%	AAIL (Secured FC) – 100%	AAIL (earlier RCFL) (Secured FC) – 100%	AAIL (Secured FC) – 100%	AAIL (Secured FC) – 71.19%; Azalia Distribution Pvt. Ltd. (Unsecured FC) – 28.81%	AAIL (Secured FC) – 100%	AAIL (Secured FC) – 94.67%; Invent Assets Securitisation & Reconstruction Pvt. Ltd. – 5.33%	AAIL (Secured FC) – 100%			
Admitted Claims	₹420.19 crore	₹221 crore	₹33.12 crore	₹263.42 crore	₹607.41 crore	₹593.44 crore	₹648.67 crore	₹581.80 crore	₹213.18 crore	₹368.72 crore	
Realisation Value to Creditors	Application seeking approval of resolution plan is sub judice before AA						₹9 lakh (0.014%)	₹8 lakh (0.014%)	₹13 lakh (0.014%)	Application seeking approval of resolution plan is sub judice before AA	
Name of PRAs and Plans	EOI- 2 Plan- 1	EOI- 2 Plan- 1	EOI-1 Plan- 1	EOI- 2 Plan- 2	EOI-4 Plan- 1	EOI- 2 Plan- 1	EOI- 2 Plan- 1	EOI- 3 Plan- 1	EOI- 2 Plan- 1	EOI-2 Plan- 1	
Resolution Plans Received	1	1	1	2	1	1	1	1	1	1	
Name of SRA	Micro Capital Private Limited										

2.7.6 The aforesaid table indicates that the said ten CIRPs were initiated within a proximate time frame by a common applicant financial creditor, namely Reliance Commercial Finance Limited (RCFL). It was also observed that in all these CIRPs, a common IRP, namely Truee IPE LLP [IP Registration No. IBBI/IPE-0151/IPA- 1/2023-24/50052], of which Mr. Chandra Prakash Jain is a designated partner, was proposed, and said IPE was subsequently appointed

as the RP. The CoC composition in these matters was also largely similar, with either RCFL or Authum Investment & Infrastructure Limited (AAIL) acting as the primary secured financial creditor with majority voting share.

- 2.7.7 With regard to the conduct of the resolution process, including invitation of expression of interest (EOI), preparation of the list of prospective resolution applicants (PRAs), and submission of resolution plans, it was observed that the processes across these CIRPs were carried out during late 2024 to end of 2025. It was further noted that in all these CIRPs, participation of resolution applicants appeared limited, with a common successful resolution applicant (SRA), namely Micro Capitals Private Limited, featuring across the processes. In the three CIRPs where resolution plans have been approved, the realisations to creditors are minimal, below one percent. In the remaining seven CIRPs, the resolution plans have been approved by the respective CoCs and are pending approval before the AA.
- 2.7.8 The above observations indicate a pattern in the initiation and conduct of the CIRPs, including common stakeholders, timelines, and outcomes. The extent of common pattern across multiple CIRPs reflected a structured and coordinated approach in the conduct of these processes with a pre-determined outcome of closure of the process rather than facilitating a resolution process of these CDs.
- 2.7.9 Further the CIRP of Triumvirate Sorority Private Limited (CD-11) was initiated pursuant to order dated 21.11.2023 passed by the AA on an application filed under Section 9 of the Code by an operational creditor, viz., Global Wind Infrastructure and Services Private Limited (Global Wind). In this CIRP also Truee IPE LLP of which Mr. Chandra Prakash Jain is a designated partner, was appointed as the IRP and subsequently as the RP.
- 2.7.10 It was noted from the admission order of the CD-11 that the operational debt of the CD-11 could not be paid due to non-availability of funds. It was further noted that the same operational creditor, Global Wind, had initiated CIRP against another CD, viz., Triumvirate Sons Enterprises Private Limited (TSEPL) which was admitted vide AA's order dated 20.10.2023. It was further observed that CD-11 and TSEPL share the same registered office address and Directors. Further, the IRP and RP in the CIRP of TSEPL was a partner of the IPE which acted as the IRP in the stated ten CIRPs and of which Mr. Chandra Prakash Jain is also a partner. This indicated that both the CIRPs were initiated by the same applicant and admitted within a close time frame. It was further observed that a common SRA, namely West End Investment and Finance Consultancy Private Limited, submitted resolution plans for both these CDs.
- 2.7.11 The foregoing pattern suggested that such coordinated conduct was not confined to the aforesaid ten CIRPs but extended to the other CIRPs as well (CD11 and CD 12), reflecting a predesigned pattern for the closure of the CD and not for the resolution of the aforesaid CDs,

B. Existence of Significant Red Flags and Material Indicators arising from SEBI's Order dated 22.08.2024 in the matter of Reliance Home Finance Limited (RHFL) and 27 other entities, relating to Potential Avoidance Transactions

- 2.7.12 It was noted from the Information Memorandums (IM) in the ten CIRPs (CD-1 to CD-10) that Mr. Chandra Prakash Jain was aware of an order dated 22.08.2024 passed by the SEBI in the matter of RHFL and 27 other entities, wherein it was held that these entities were involved in perpetrating a fraudulent scheme by disbursing General Purpose Working Capital Loans (GPCL) resulting in erosion of the RHFL's finances due to such loans eventually being declared non-performing asset (NPA).
- 2.7.13 In the SEBI's order dated 22.08.2024 there were grave findings regarding sanction and disbursement of large General Purpose Corporate (GPC) loans from RCFL to entities with negligible or negative financials, without adequate due diligence, credit rating, collateral, or security creation. It was noted that the nine out of aforesaid twelve CDs (i.e., excluding CD-7 and CD-11) mentioned in the aforesaid SEBI order are part of the borrower and onward lending entities.
- 2.7.14 In view of the above, the Board held the *prima facie* view that upon taking cognizance of the order of SEBI, it was incumbent upon Mr. Chandra Prakash Jain to exercise heightened due diligence in the process of forming an opinion whether CDs were subjected to transactions under Sections 43, 45, 50 or 66 of the Code.

C. Existence of Significant Red Flags and Material Indicators relating to CD's Financial Position and Prominent Lending and/or Borrowing Transactions.

- 2.7.15 On examination of the IM, audited financial statements and public corporate records of the eleven CDs (Celebrita Mediahouse Private Limited (CD-1) RPL Star Power Private Limited (CD-2) Arion Movie Production Private Limited (CD-3) Azalia Distribution Private Limited (CD-4) Hirma Power Limited (CD-5) Tulip Advisors Private Limited (CD-6) Thwink Big Content Private Limited (CD-7) Accura Productions Private Limited (CD-8) Pifiniti Movies Private Limited (CD-9) Edrishti Movies Private Limited (CD-10) and Triumvirate Sorority Private Limited (CD-11)), it was observed by the Board that a consistent financial pattern existed across the CIRPs handled by Mr. Chandra Prakash Jain. Despite having negligible or no business operations or assets or trade receivables, these CDs were engaged in substantial lending and borrowing transactions, particularly with group entities, while their net worth remained consistently negative over the years. The financial status of these CDs, when compared with the magnitude of loans advanced or borrowed, reflected a clear mismatch between their repayment capacity and the exposure. The CD-wise financial details indicating significant red flags in relation to potential avoidance transactions were mentioned in the SEBI order as under:

a. In the CIRP of Celebrita Mediahouse Private Limited (CD-1).

It was noted from the 1st CoC meeting held on 08.06.2024, the IM and audited financial statements for FY 2022–23 that the CD had no business operations, no revenue from operations, and no tangible assets including property, plant or equipment. Notwithstanding such weak financial position, the financial statements reflected that the CD had extended

substantial short-term loans and advances to Reliance Big Entertainment Private Limited (RBEPL), against which full impairment provision was created. It was further noted that the statutory auditors, in their report, stated that they were unable to comment on the recoverability of such loans, including interest, considering the financial strength and repayment capacity of the borrowers.

It was further noted that the CD had also made long-term investments (in equity shares) in entities such as Arion Movie Production Private Limited (CD-3), Accura Productions Private Limited (CD-8), etc. These entities were identified in the SEBI's Order as promoter- related entities/GPCL borrowers having common addresses. Further, it was noted that the CD was also identified among promoter- related entities/GPCL borrowers having common addresses.

b) In the CIRP of RPL Star Power Private Limited (CD-2).

It was noted that from the IM that the CD had no business operations, no revenue from operations, no tangible assets including property, plant or equipment, and trade receivables. The net worth of the CD had remained negative over a sustained period. Despite the absence of operational activity, the CD had extended large short-term loans and advances amounting to CLE Private Limited, against which full provision for doubtful advances was created. This entity was identified in the SEBI Order as promoter-related entities/GPCL borrowers having common addresses.

It was further noted that the CD had substantial borrowings originally from RHFL and subsequently assigned to RCFL and now forming part of exposure of AAIL, which constituted the sole member of the CoC having 100% voting share., Further, it was noted that the CD was identified among the GPCL borrowers in the SEBI's order.

c. In the CIRP of Arion Movie Production Private Limited (CD-3).

It was noted from the IM that the CD had no substantial business operations, negligible revenue, and no tangible assets including property, plant or equipment or trade receivables. The net worth of the CD had remained negative. Despite such weak financial position, the CD had extended short- term loans and advances (inter-corporate deposit), against which full provision for doubtful advances was created. It was also observed from the admission order of the AA that the CD had substantial borrowings originally extended by RHFL and subsequently assigned to RCFL, which was the sole CoC member holding 100% voting share through AAIL. The CD was identified as one of the GPCL borrowers in the SEBI's order having availed crore of GPC loan from RHFL. Further, it was noted that the CD was also identified among promoter-related entities/GPCL borrowers having common addresses.

d. In the CIRP of Azalia Distribution Private Limited (CD-4).

It was noted that in the IM and public corporate records that the CD had no revenue from operations, no tangible assets including property, plant or equipment, and no trade receivables. The net worth of the CD remained negative over a sustained period. Despite such weak financial position, the CD extended loans and advances to group entities, including Hirma

Power Limited (CD-5) and Reliance Broadcast Network Limited, against which full impairment provision was created.

It was observed from the admission order of the AA that loan facilities were originally extended by RHFL and were subsequently assigned to RCFL in March 2023, which was the sole CoC member holding 100% voting share through AILL. The CD was identified as one of the GPCL borrowers in the SEBI's order having availed crore GPC loan from RHFL.

e. In the CIRP of Hirma Power Limited (CD-5).

It was noted from the public corporate records (FY 2022-23) that the CD had no revenue from operations, no tangible assets including property, plant or equipment, and trade receivables, with persistently negative net worth. The financial records reflected limited loans and advances and non-current investments, the realizability of which was stated to be uncertain. It was further observed that the CD had significant borrowings availed from RCFL and RHFL, aggregating to a significant financial debt as reflected in admission order of the AA. The CD was identified as one of the GPCL borrowers in the SEBI's order having availed crore of GPC loan from RHFL. Further, it was noted that the CD was also identified among promoter-related entities/GPCL borrowers having common addresses.

f. In the CIRP of Tulip Advisors Private Limited (CD-6).

It was noted from the admission order that substantial loan was originally granted by RHFL was assigned to RCFL, with AILL constituting 100% of the CoC. The audited financial statements for the year ending 31.03.2023 reflected that the CD had made substantial investments in entities such as CLE Private Limited, Skyline Global Trade Private Limited and Species Commerce and Trade Private Limited. These entities were identified in the SEBI Order as promoter-related entities/GPC borrowers having common addresses. The CD itself was identified as one of the GPCL borrowers having availed crore of loan from RHFL. The statutory auditors for FY 2022-23 gave qualified opinion regarding non-provision of interest on borrowings and drew emphasis of matter regarding substantial investments stating that they are unable to comment on the realisability of said investments, as the assessment involved significant management judgment and assumptions. It was additionally reported by statutory auditors that weaknesses were observed in internal financial controls, specifically regarding the need to strengthen investment documentation, justification for the exposures, risk assessments for exposures, and policies for sanctioning investments to entities with weaker creditworthiness.

g. In the CIRP of Thwink Big Content Private Limited (CD-7).

It was noted from the IM that the CD had no revenue from operations, no tangible assets including property, plant or equipment, and trade receivables, with a persistently negative net worth. The financial position reflected negligible loans and advances compared with substantial borrowings, indicating a highly skewed liability structure. It was further observed from the admission order of the AA that the CD had availed significant working capital loan

facilities from RCFL and additional facilities from RHFL, which were subsequently assigned to RCFL in March 2023, resulting in an admitted default of crore of rupees.

h. In the CIRP of Accura Productions Private Limited (CD-8).

It was noted that the admission order of AA recorded that the loan originally granted by RHFL was assigned to RCFL. AAIL acquired control of RCFL following a resolution process under the RBI framework. AAIL constituted 100% of the CoC in the present CIRP. The audited financial statements for the year ending 31.03.2023 reflected that the CD had investments in certain entities such as Celebrita Mediahouse Private Limited (CD-1), Arion Movie Production Private Limited (CD-3), etc. Further, the CD had extended loans and advances to entities viz, Big Flicks Private Limited, RBEP Entertainment Private Limited and Zapak Digital Entertainment Private Limited. Some of these entities were identified in the SEBI order as promoter-related entities/GPC borrowers with the same address. Further, it was noted that the CD was also identified among promoter-related entities/GPCL borrowers having common addresses. The statutory auditors for the FY 2022-23 in their report gave qualified opinion regarding non-provision of interest on borrowings and drew emphasis regarding loans and investments stating that they were unable to comment on the recoverability of said loans.

i. In the CIRP of Pifiniti Movies Private Limited (CD-9).

It was noted that the admission order of the AA recorded that the loan originally granted by RHFL was assigned to RCFL. AAIL acquired control of RCFL following a resolution process under the RBI framework. AAIL constituted 100% of the CoC in the present CIRP.

Further, the audited financial statements for the year ending 31.03.2023 reflect that the CD had investments in various entities, such as Celebrita Mediahouse Private Limited (CD-1), Arion Movie Production Private Limited (CD-3), Azalia Distribution Private Limited (CD-4), Thwink Big Content Private Limited (CD-7), Accura Productions Private Limited (CD -8) and Edrishti Movies Private Limited (CD-10), etc. Furthermore, the CD had extended loans and advances to an entity viz., RBEP Entertainment Private Limited. Some of these entities were identified in the SEBI order as promoter-related entities/GPCL borrowers with the same address. Further, it was noted that the CD was also identified among promoter-related entities/GPCL borrowers having common addresses.

The statutory auditors for the FY 2022-23 in their report gave qualified opinion regarding non-provision of interest on borrowings and drew emphasis regarding loans and investments stating that they were unable to comment on the realisability of said loans and investments.

j. In the CIRP of Edrishti Movies Private Limited (CD-10).

It was noted that the admission order of AA recorded that the loan originally granted by RHFL was assigned to RCFL. AAIL acquired control of RCFL following a resolution process under the RBI framework. AAIL constituted 100% of the CoC in the present CIRP.

The financial statements of the CD for the FY 2022–23 showed that the CD had investments in various entities, such as Celebrita Mediahouse Private Limited (CD-1), Arion Movie Production Private Limited (CD-3), Azalia Distribution Private Limited (CD-4), Thwink Big

Content Private Limited (CD-7), Accura Productions Private Limited (CD -8) and Pifiniti Movies Private Limited (CD -9), etc. Further, the CD had extended loans and advances to entities viz, Big Flicks Private Limited, RBEP Entertainment Private Limited and Zapak Digital Entertainment Private Limited. Some of these entities were identified in the SEBI order as promoter-related entities/GPCL borrowers with the same address. Further, it was noted that the CD was also identified among promoter-related entities/GPCL borrowers having common addresses.

The statutory auditors for the FY 2022-23 in their report gave qualified opinion regarding non-provision of interest on borrowings and drawn emphasis regarding loans and investments stating that they were unable to comment on the realisability of said loans and investments.

k. In the CIRP of Triumvirate Sorority Private Limited (CD-11).

It was noted from the IM that the summary of assets and liabilities indicated a significantly skewed financial position, with total assets of approximately Rs.17.24 crore vis-à-vis long-term borrowings of approximately Rs.4,930.50 crore, resulting in substantial erosion of the net worth. The statutory auditors for the FY 2022-23 gave qualified opinion regarding non-provision of interest on borrowings and drew emphasis that they were unable to comment on the realisability of said investments.

2.7.16 The aforesaid facts, specific to each of the eleven CDs, indicated that the CDs exhibited a pattern characterised by absence or minimal business operations, negligible tangible assets and sustained negative net worth. At the same time, these entities extended substantial loans, advances or investments to interconnected entities, many of which are identified in the SEBI Order as promoter-related or GPCL borrowers. The financial statements reflected that such exposures were largely impaired or of doubtful recoverability. It was further observed that the borrowings of these entities originate from RHFL and were subsequently assigned to RCFL and thereafter to AILL, which in most cases constituted the sole or dominant member of the CoC. Additionally, recurring concerns were raised by statutory auditors regarding non-recoverability of loans, non-realisation of investments, non-compliance with accounting standards and weaknesses in internal financial controls with respect to loans/ investments from/ to entities with weaker creditworthiness.

2.7.17 In view of the above, the Board held a *prima facie* view that the features noted across these eleven CIRPs, when considered collectively, indicate a structured pattern of financial transactions and exposures among interconnected entities, raising concerns regarding the commercial substance of such arrangements and constituted sufficient indicators warranting detailed due diligence under Sections 43, 45, 50 and 66 of the Code.

D. Failure to file Section 19(2) application/ Inordinate delay in filing of Section 19(2) application

2.7.18 Section 18(a) of the Code provides that the IRP shall collect all information relating to the assets, finances and operations of the CD for determining the financial position of the CD. Further, Section 19(2) of the Code provides that where any personnel of the CD, its promoter

or any other person required to assist or cooperate with the IRP does not assist or cooperate, the IRP may make an application to the AA for necessary directions.

- 2.7.19 In the CIRP of Edrishti Movies Private Limited (CD-10), it was observed from the IM dated 26.09.2024 that certain documents relating to loans extended by the CD were still awaited at that stage. This indicated that only limited information had been obtained from the suspended management during the CIRP.
- 2.7.20 Despite the aforesaid status, it was noted that the application seeking approval of the resolution plan was filed in April 2025 (registered in June 2025). Thereafter, an application under Section 19(2) of the Code (IA No. 4952 of 2025) was filed in October 2025, i.e., at a substantially later stage, after the resolution plan approval application had already been filed.
- 2.7.21 Further, it was observed from the order dated 06.02.2026 of the AA, whereby the application for approval of the resolution plan was de-reserved, that Mr. Chandra Prakash Jain apprised the AA that certain information/documents had been sought from the Directors of the suspended board of the CD and requested additional time of two months. Consequently, the AA de-reserved the order on the resolution plan.
- 2.7.22 The aforesaid sequence of events, evidenced that the issue of non-availability of information was not addressed at the appropriate stage by invoking Section 19(2) of the Code within a reasonable timeframe. Instead, the CIRP was progressed and the resolution plan approval was pursued despite incomplete information, and recourse to Section 19(2) was taken only at a belated stage, resulting in derailment of the CIRP timeline.
- 2.7.23 In the CIRP of Pifiniti Movies Private Limited (CD-9), it was noted from the minutes of the 10th CoC meeting held on 05.05.2025 that Mr. Chandra Prakash Jain had stated that *“The RP also informed the members that the Forensic Auditor has been sending regular follow-up emails to the suspended management requesting the necessary documents and clarifications to complete the audit. However, no response has been received thus far. The RP directed the suspended management to provide the requisite information to the Forensic Auditor within 7 days, failing which it would be deemed as non-cooperation on their part. In such an event, the RP shall be constrained to initiate appropriate action against the Suspended Management in accordance with the provisions of the Insolvency and Bankruptcy Code, 2016.”*
- 2.7.24 There was no record available to indicate that Mr. Chandra Prakash Jain filed an application under Section 19(2) of the Code seeking direction from the AA for the cooperation from the suspended management. Consequently, the forensic audit could not be completed on account of alleged non-availability of information and Mr. Chandra Prakash Jain declared in Form CIRP-8 that no avoidance transactions were identified.
- 2.7.25 In view of the above, it was noted that Mr. Chandra Prakash Jain failed to take timely and appropriate recourse to Section 19(2) of the Code to secure cooperation from the suspended management, thereby proceeding with the above stated CIRPs (CD-9 and CD-10) in the absence of complete information. As a consequence, no opinion on avoidance transactions

were formed, and the belated invocation of Section 19(2) further led to derailment of the CIRP timeline.

E. Improper filing of Form CIRP-8 with the Board (CIRP Progress-related Reporting Compliances with the Board)

- 2.7.26 It was noted that Form CIRP-8 was filed in all the ten CIRPs (CD-1 to CD-8, CD-10, CD-11) wherein for all the eleven CDs Mr. Chandra Prakash Jain declared “No” against the information pertaining to forming an opinion and making a determination in respect of transactions covered under Sections 43, 45, 50 and 66 of the Code, while giving remarks such as “*The Transaction Audit report is not yet received by the RP for forming opinion*” or “*The RP has appointed transaction auditor for PUFEE verification the report is awaited*” or “*The RP is waiting for transaction audit report which is under process*” or Transaction Audit report not yet received by the RP hence no opinion formed till date by the RP.
- 2.7.27 It was the duty of RP to form an opinion and make a determination whether the CD has been subjected to any transaction covered under Sections 43, 45, 50 or 66 of the Code. Contention of Mr. Chandra Prakash Jain that the transaction audit report was awaited does not absolve him of his independent statutory responsibility. The obligation to form such opinion and make a determination is not conditional..
- 2.7.28 In view of the above, the Board held a *prima facie* view that Mr. Chandra Prakash Jain failed to undertake the requisite independent due diligence while forming an opinion and making a determination in respect of avoidance transactions and in ensuring that the reporting obligations are complied with, in letter and spirit.
- 2.7.29 Additionally, in the CIRP of Pifiniti Movies Private Limited (CD-9), it was noted that during the 4th CoC meeting held on 08.11.2024, Mr. Chandra Prakash Jain shared an update on transaction audit and stated that as per transaction audit report, there was no avoidance transactions. It was further recorded in the CoC minutes that although the transaction auditor had not identified avoidance transactions, however, it had recommended further investigation and forensic audit, indicating concerns regarding the nature of transactions.
- 2.7.30 Mr. Chandra Prakash Jain had filed Form CIRP-8 in October 2024 stating that no opinion has been formed in respect of avoidance transactions. However, subsequent CoC records reflected that concerns were flagged in the transaction audit report and further investigation, including forensic audit, was recommended. Despite these red flags, Mr. Chandra Prakash Jain did not undertake independent or augmented due diligence, nor did he take adequate steps to ensure timely completion of the audit process in the matter.

F. Significantly low realisations to creditors and Disproportionate haircuts

- 2.7.31 In the following matters, a consistent pattern was observed in terms of significantly lower realisations and excessive haircuts to the creditors:

i. In the CIRP of Thwink Big Content Private Limited (CD-7), it was noted that the fair value and liquidation value was (Rs. 80,026). The resolution plan approved in the matter provides for a total payment of Rs.0.21 crore (Rs. 21 lakh), including Rs.0.08 crore (Rs. 8 lakh) towards secured financial creditors and Rs.0.01 crore (Rs. 1 lakh) towards unsecured financial creditors. As against the admitted claims of approximately Rs.648.67 crore, the resolution plan provided a negligible realisation of around 0.014% for the creditors.

ii. In the CIRP of Accura Productions Private Limited (CD-8), it was noted that the fair value and liquidation value were both Rs. 34,220. The resolution plan approved in the matter provides for a meagre Rs.8 lakh as against the admitted claims of about Rs.581.8 crore i.e. only 0.014% realisation for the creditors.

iii. In the CIRP of Pifiniti Movies Private Limited (CD-9), it was noted that the fair value and liquidation value were both Rs.1 lakh. The resolution plan approved in the matter provides for a meagre Rs.13 lakh as against the admitted claims of about Rs.213.18 crore i.e. only 0.06% realisation for the creditors.

iv. In the CIRP of Triumvirate Sorority Private Limited (CD-11), it was noted that the fair value and liquidation value was Rs. 10.16 crore and Rs. 7.39 crore, respectively. The resolution plan approved in the matter provides for Rs. 6 crore which was less than both the fair value as well as liquidation value. This amount includes Rs. 5.6 crore to creditors as against the admitted claims of about Rs. 632.66 crore i.e. only 0.89% realisation for the creditors. It was further noted that the application under Section 30(6) of the Code for seeking approval of the resolution plan was filed beyond the CIRP period of 270 days including extension, which is in contravention of Section 12(3) of the Code read with Regulation 40 of the CIRP Regulations.

2.7.32 It was observed that the CDs had negligible assets and persistently negative net worth. However, the substantial gap between the admitted claims and the realisation, particularly in the context of significant lending and inter-corporate exposures reflected in the financial statements, necessitated a examination of the transactions undertaken prior to commencement of CIRP to form an opinion whether the CDs were subjected to PUFÉ transactions covered under Sections 43, 45, 50 or 66 of the Code.

G. Other Material Available on Record

2.7.33 The Enforcement Directorate (ED) had shared certain information with the Board under Section 66(2) of the Prevention of Money Laundering Act, 2002 (PMLA), in respect of CDs, forming part of Reliance Anil Ambani Group and Associates (RAAGA), including all the eleven CDs. As per information provided, during the course of search operations conducted by the ED, certain digital devices were seized.

2.7.34 Upon analysis of the information and data contained therein by the Board, it was revealed that the IBC framework was being misused as a tool of tax avoidance, corporate restructuring with *malafide* objectives, money laundering, etc.

2.7.35 In view of the above facts and circumstances, it was noted that despite the existence of multiple glaring red flags, including a detailed SEBI order identifying the CDs as a specified GPCL borrower involved in suspicious fund routing, substantial lending by the RHFL and further by RCFL into promoter-related entities, assignment of debt to a sole financial creditor forming 100% of the CoC, qualified opinion and emphasis of matter in the auditor's report, weak financial position of the CDs, non-cooperation and non-availability of information without timely recourse to Section 19 of the Code, non-filing of requisite CIRP forms, and negligible realisation to creditors, Mr. Chandra Prakash Jain, prima facie, failed to exercise due diligence in forming an opinion, determining the existence of avoidance transactions, and taking appropriate action in terms of Section 25(2)(j) of the Code read with Regulation 35A of the CIRP Regulations. The aforesaid facts, when considered collectively, prima facie, indicated a coordinated pattern of actions among stakeholders, suggesting that the CIRPs were conducted as a mechanism for closure rather than resolution which is contrary to the objectives of the Code. It was further observed that despite multiple structural and procedural similarities across these CIRPs, including the same creditor initiating the CIRP, common financial creditor forming the CoC, shared addresses, similar financial health and transaction patterns, involvement of a common SRA, and consistently low realisations, it was incumbent upon Mr. Chandra Prakash Jain failed to exercise a higher degree of professional diligence and independence and to critically examine whether the processes were part of a coordinated framework designed to achieve pre-determined outcomes. However, the records indicate that Mr. Chandra Prakash Jain neither scrutinized nor did he bring to the attention of the AA the apparent structural similarities between the eleven CIRPs discussed herein indicating fraudulent initiation of the processes under Section 65 of the Code. Instead, he presided over these CIRPs, and facilitated the conduct and culmination of these processes in a manner inconsistent with the spirit and intent of the Code.

2.7.36 In view of the above, the Board held the *prima facie* view that Mr. Chandra Prakash Jain had contravened Sections 12(3), 19, 25(2)(j), 30(6), 65(1), 208(2)(a) and (e) of the Code and Regulation 35A, 40, 40B of the CIRP Regulations and Regulation 7(2)(a) and (h) of the IP Regulations read with Clauses 1, 2, 3, 13 and 14 of the Code of Conduct

2.8 Submissions by Mr. Chandra Prakash Jain.

Preliminary Submissions

2.8.1 Mr. Chandra Prakash Jain submitted that the SCN proceeded on presumptions, generalisations, and retrospective inferences, without appreciating the limited statutory role of RP, the paramount status of the commercial wisdom of the CoC, and the practical constraints of the CIRP, including non-cooperation by the suspended management.

2.8.2 Mr. Chandra Prakash Jain submitted that the present SCN purported to have been issued under Regulation 11 of the Inspection Regulations. However, the mandatory procedural framework contemplated under the said Regulations has not been followed in the present case. No inspection or investigation was conducted, no draft or final inspection/investigation report was

ever furnished, and no opportunity was provided to respond to any prima facie findings prior to issuance of the SCN. The SCN also does not disclose or annex any such report forming the basis of the allegations.

Response on Initiation and Conduct of Systematically Coordinated CIRPs

- 2.8.3 Mr. Chandra Prakash Jain submitted that he did not control initiation of CIRP and such initiation was judicially scrutinised by the AA. Commonality of financial creditors, group entities, or timelines cannot ipso facto imply collusion or coordination.
- 2.8.4 He submitted that the SCN fails to demonstrate any meeting of minds, any improper conduct by the RP, or any violation attributable to Mr. Chandra Prakash Jain. The role of the RP is procedural and facilitative, and not investigative beyond statutory mandate. At the time the Section 7 petitions were filed for CD-1 to CD-10, RCFL was merged entity with AAIL for over 13 months, it was not part of RAAGA (Reliance Anil Ambani Group). Mr. Chandra Prakash Jain as RP appointed by the AA, had no basis and no obligation to treat the Financial Creditor as a RAAGA entity. The CIRP was initiated by an independent Financial Creditor exercising its legitimate creditor rights under Section 7 of the Code.
- 2.8.5 He submitted that AAIL has filed number of applications, under Section 7 of the IBC, against the Corporate Debtors to recover the old loans given by erstwhile Management. Mr. Chandra Prakash Jain being the Designated Partner of Truee IPE LLP gave the written consent to act as IRP/RP or all the CDs when approached by the Financial Creditor.
- 2.8.6 Mr. Chandra Prakash submitted that he carried out the process diligently and in accordance with law. Different EOI processes were conducted separately for each CD, different numbers of PRAs submitted EOIs across the ten CIRPs, and that the resolution plans were approved by the respective CoCs independently, conclusively disproves any allegation of a pre-decided or syndicated outcome.
- 2.8.7 He further submitted that the role of the Resolution Professional is limited to conducting a due diligence exercise and placing compliant resolution plans before the CoC, without exercising any adjudicatory or decision-making powers.
- 2.8.8 Mr. Chandra Prakash submitted that he was aware of the fact and evaluated all angles to validate whether there was any relationship between the CD-I to CD-10 with the FC. The related party definition as per IBC and Companies Act was tested for all the ten CDs and it was found that there were no connections between FC and CD -1 to CD-10.

Submission on failure to identify fraudulent/malicious initiation (Section 65)

- 2.8.9 Mr. Chandra Prakash Jain submitted that determination under Section 65 of the Code requires clear evidence of fraudulent intent, not mere suspicion. No such conclusive material was available during CIRP. The RP relied upon records available, sought information from stakeholders, and acted within the confines of commercial and evidentiary realities. The Code

does not impose an obligation on the RP to act on speculative or inferential suspicion. Further, the aforesaid background clarifies that Mr. Chandra Prakash Jain had no occasion to presume that the Financial Creditor was related to the CD under the provisions of the Code.

Submission on Avoidance Transactions (Section 43, 45, 50, 66 of the Code)

2.8.10 Mr. Chandra Prakash Jain had submitted that he had appointed transaction auditors/forensic auditors in multiple CIRPs. The process of identification of avoidance transactions is fact-intensive and dependent on data availability. In several CIRPs, books and records were incomplete, suspended management was non-cooperative, third-party confirmations were unavailable. Whilst the SCN incorrectly assumes that opinion formation is independent of transaction audit, practically the RP must rely on expert inputs, especially in complex financial structures. Filing “No” in Form CIRP-8 was based on available information at the relevant time, subject to ongoing audit processes and not a final or conclusive determination. Thus, there was no suppression or misrepresentation.

Submission on SEBI Order and Alleged Red Flags

2.8.11 Mr. Chandra Prakash Jain submitted that the SEBI order pertains to Reliance Home Finance Limited (RHFL) and related entities and there is no finding against him in the said order of SEBI. The RP is not an adjudicatory authority to independently conclude fraud based on regulatory observations. Mr. Chandra Prakash Jain took note of the order, sought clarifications from creditors, and incorporated relevant disclosures in the IM.

2.8.12 Mr. Chandra Prakash Jain submitted that the transaction audit was duly conducted and no PUFF transactions were identified. Upon assumption of charge as RP, he duly appointed a Transaction Auditor in accordance with Regulation 35A of the CIRP Regulations. The Transaction Auditor conducted an independent and thorough examination of the books of account, financial records, and transactions of each CD. The Transaction Audit Reports, prepared by M/s. Shah & Gandhi, Chartered Accountants and M/s Chaturvcdi & Co. as independent professionals, categorically concluded that no Preferential, Undervalued, Fraudulent, or Extortionate (PUFF) transactions were identifiable in respect of any of the ten CDs (CD-1 to 10). The only observation noted was that further investigation was recommended. Mr. Chandra Prakash Jain exercised his due diligence and immediately appointed the same Auditor as Forensic Auditor in order to look back the transaction of preceding three years. For completing the Forensic Audit report, Auditor required certain documents from the Suspended Board of Management which they were providing in piece meal manner. As the CIRP is a time bound process, RP upon the approval of Resolution Plan filed the IA for approval of Resolution pending the Forensic Audit. The same fact was apprised before the AA. However, due to non-submission of complete list of documents by the suspended Management, Mr. Chandra Prakash Jain filed IA for non-cooperation against the Suspended Management during the pendency of the Plan in CD-I to CD-6 and CD-10. Thus, the SCN seeks to impose a higher standard of investigation than contemplated under the Code.

- 2.8.13 Regulation 35A(1) of the CIRP Regulations requires the RP to form an opinion as to whether the Corporate Debtor was subjected to any transactions under Sections 43, 45, 50 or 66 of the Code. This duty is circumscribed by the records of the Corporate Debtor and the information available to the RP. Where an independent Transaction Audit Report concludes the absence of any such transaction, the RP's opinion reflecting the same is a legitimate, reasoned, and professional conclusion.
- 2.8.14 The SCN does not identify any specific transaction qualifying as preferential, undervalued, fraudulent, or extortionate. A general allegation without identifying the specific impugned transaction and its statutory ingredients is vague, unspecified, and legally unsustainable. It was submitted that initiation of proceedings under Sections 43, 45, 50 and 66 of the Code is not automatic or mechanical, and the same can only be undertaken upon satisfaction of specific statutory thresholds and ingredients.
- 2.8.15 In the absence of identification of any specific transaction satisfying the aforesaid statutory ingredients, no application under the aforesaid provisions can be initiated. The law does not permit the Resolution Professional to file avoidance applications in a mechanical or speculative manner, merely on the basis of general observations or external reports, without demonstrating how the underlying transactions meet the statutory thresholds. It was further submitted that the Transaction Auditor was an independent professional appointed in accordance with the CIRP Regulations, possessing the requisite expertise to examine financial transactions. Once the Transaction Auditor, after detailed examination, concluded that no PUFEE transactions existed, it was justified in forming his opinion accordingly. The RP cannot substitute the technical findings of an independent expert with conjecture or hindsight analysis, nor can he be expected to initiate avoidance proceedings in the absence of any identified transaction satisfying the statutory ingredients. The Code does not cast an obligation upon the RP to conduct roving or fishing investigations or to act upon third-party allegations or regulatory findings without independent corroboration from the records of the CD. It is a settled position that the RP cannot assume the role of an investigating agency or enforcement authority. In the absence of cogent material available on record of the CD indicating the existence of avoidable transactions, Mr. Chandra Prakash Jain could not have initiated speculative proceedings merely on the basis of external observations.
- 2.8.16 The SEBI Order dated 22.08.2024 in the matter of RHFL came after CIRP initiation and does not conclusively establish fraud by the CDs. The SCN relied significantly upon the SEBI order in the matter of RIIFL to allege that CD-1 to CD -10 received fraudulent GPCL disbursements. On that he submitted that the SEBI Order is an order in the matter of RIIFL (the lender), not in the matter of CD-1 to CD-10. The findings of the SEBI Order are in respect of the conduct of RHFL's management in disbursing GPCL loans. The CDs were borrowers. The SEBI Order does not make any adjudicatory finding that CDs committed fraud or that funds received by it constituted avoidable transactions under the IBC. A regulatory penalty upon a lender document does not *ipso facto* transform the receipt of funds by a borrower into a fraudulent transaction under Section 66 of the Code.

- 2.8.17 The Hon'ble NCLAT has consistently held that dishonesty and fraudulent intent are essential ingredients of Section 66 and cannot be presumed. Reliance is placed on *Renuka Devi Rangaswamy v. Mr. Madhusudan Khemka (Company Appeal (AT)(CH)(Ins) No. 356 of 2022)*, wherein it was held that dishonesty is an essential ingredient of fraudulent trading and cannot be inferred without cogent material. Similarly, in *Gopal Kalra v. Akhilcsh Kumar Gupta (Company Appeal (AT)(INS) No. 567 of 2024)*, affirmed by the Hon'ble Supreme Court in Civil Appeal No. 13418/2025, it was held that Section 66 of the Code requires examination of whether there was intent to defraud and whether the person concerned was a knowing party to such conduct,
- 2.8.18 He submitted that under Regulation 35A, the duty of the RP is to examine transactions of the Corporate Debtor from the available records. The Transaction Audit Report, based on such records, did not reveal any identifiable PUFEE transaction. The SCN and documents annexed therewith did not identify any specific transaction, act, or omission on the part of the Mr. Chandra Prakash Jain that satisfies the statutory ingredients of Sections 43, 45, 50 or 66 of the Code. In the absence of such particulars, the allegations are vague and unsustainable. With regard to the auditor's remarks concerning the recoverability of investments and the material uncertainty relating to the going concern assumption, it is submitted that such observations support and vindicate the opinion formed by the Transaction Auditor in not classifying the subject transactions as fraudulent in nature. The non-recoverability of investments had been consistently acknowledged by the independent Statutory Auditor in prior years, and at no point had the Statutory Auditor raised any qualification or observation indicating a fraudulent character of these transactions. Further, no concerns relating to fraud were ever reported by any Statutory Auditor under Section 143(12) of the Companies Act, 2013 in the past.

Submission on Section 19(2) -Delay/ Non-Filing.

- 2.8.19 Mr. Chandra Prakash Jain denied the allegations regarding delay or failure to file application under Section 19(2) of the Code. It was submitted that he had made continuous efforts to obtain cooperation from suspended management. Section 19(2) is invoked when non-cooperation reaches a threshold, not at the first instance. In certain cases, the RP exercised commercial judgment to proceed with available information to avoid delay in CIRP timelines. The alleged delay did not prejudice stakeholders, nor materially affect CIRP outcomes.
- 2.8.20 It is submitted that from the commencement of the CIRP the Suspended Management (SM) was repeatedly called upon to extend full cooperation to the RP in terms of Section 19(1) of the Code, including furnishing of complete books of accounts, records, and other relevant information necessary for conducting the CIRP, including the forensic audit. Multiple communications and reminders were issued by the RP via emails and other modes, requesting the suspended management to provide the requisite information and documents in a timely manner. However, despite such continuous follow-ups, the suspended management failed to provide complete and satisfactory information. It was further submitted that the RP also issued notices to the suspended management to attend the meetings of the CoC, thereby affording them sufficient opportunity to participate in the CIRP and provide the necessary clarifications and documents. However, the suspended management failed to attend such CoC meetings and

continued to remain non-cooperative. Although certain partial information was furnished by the SM at intermittent stages, the same was grossly inadequate and incomplete, which materially impeded the progress of the CIRP and, in particular, delayed the completion of the forensic audit. In these circumstances, and upon being satisfied that the SM was persistently failing to discharge its statutory obligations under Section 19(1) of the Code, the RP, in discharge of his duties and to safeguard the interests of the stakeholders, was constrained to invoke the provisions of Section 19(2) of the Code. Accordingly, applications under Section 19(2) were duly filed before the AA in 2025 seeking necessary directions against the suspended management for cooperation and submission of pending information. Subsequent to the filing of the aforesaid application, the suspended management began extending cooperation and furnished the pending documents and information, which were thereafter promptly provided by the RP to the forensic auditor. The forensic auditor has since progressed substantially and is presently at the final stage of preparation of the forensic audit report.

Submission on Low realisation and haircuts

2.8.21 He submitted that it is settled law that Commercial wisdom of CoC is paramount (including haircut decisions). RP has no adjudicatory role in viability or value maximisation beyond process compliance. He conducted the CIRP in accordance with the law, facilitated bidding process, and placed all plans before the CoC. The SCN attempted to attribute commercial outcomes to procedural role, which is impermissible.

2.9 Analysis and findings of the DC.

2.9.1 The DC, after a thorough examination of the SCN, submissions of Mr. Chandra Prakash Jain, and the evidentiary material on record, proceeds to analyze the systemic violations observed across the twelve CIRPs.

Procedural Validity of the SCN-2

2.9.2 The RP has raised a preliminary objection that the mandatory procedural framework under Regulation 11 of the IBBI (Inspection and Investigation) Regulations, 2017, was breached because no formal draft or final inspection/investigation report was shared prior to the issuance of the SCN and no opportunity was provided to respond to any *prima facie* findings prior to issuance of the SCN.

2.9.3 The DC finds this objection of Mr. Chandra Prakash Jain as legally untenable. The Board is vested with independent statutory powers under Section 218 of the Code, to inspect, investigate, and issue an SCN upon discovering a *prima facie* case of professional misconduct or systemic non-compliance. Further, Section 218 clearly provides that the Board on the basis of material available with the Board can issue an SCN. The documents which were relied by the Board were annexed with the SCN, affording Mr. Chandra Prakash Jain full opportunity to respond to each such document.

2.9.4 The data, information, and chronological sequences on which this SCN relies are extracted directly from the RP's own statutory filings (Form CIRP-8), the Information Memorandums

(IM) he authored, and the Minutes of the CoC meetings he conducted. Because the source materials originate from the RP's own records, there is no violation of natural justice. The SCN itself functions as the foundational mechanism giving the RP a full and fair opportunity to defend his conduct.

Systematically Coordinated CIRPs and the Pre-Determined Closure Framework

2.9.5 The RP defended the striking structural commonalities across the ten CIRPs (CD-1 to CD-10) by arguing that he had no control over the initiation of the cases, that the Financial Creditor (RCFL) was an independent entity, and that the separate Expressions of Interest (EOIs) disprove a syndicated outcome.

2.9.6 The DC views that while a single common element might be coincidental, a dense, multi-layered matrix of structural overlap across twelve separate corporate insolvency proceedings reveals a coordinated mechanism engineered for asset disposal rather than genuine economic revival. The records demonstrate that across the ten CIRPs (CD-1 to CD-10) as well as related corporate entities (CD-11 and Triumvirate Sons Enterprises Private Limited), the Corporate Debtors shared nearly identical, highly distressed profiles. These included limited or completely inactive business operations, absence of meaningful assets or cash flows, and in several instances, negative or negligible net worth. Rather than operating as distinct commercial entities, their financial structures were characterized by heavy borrowing and lending transactions strictly among related or group entities.

2.9.7 Despite these clear structural warning signs, the processes across these CIRPs were moved forward within a proximate, highly compressed timeframe between late 2024 and the end of 2025. This entire ecosystem functioned under a singular network of common actors:

- **The Common Creditor/Applicant:** The CIRPs were initiated by a common applicant financial creditor, Reliance Commercial Finance Limited (RCFL), or a single operational creditor, Global Wind Infrastructure and Services Private Limited.
- **The Common RP and IPE:** In all these matters, a common IRP, namely Truee IPE LLP (IP Registration No. IBBI/IPE-0151/IPA-1/2023-24/50052), of which Mr. Chandra Prakash Jain is a designated partner, was proposed by the applicant and subsequently appointed as the RP.
- **The Overlapping CoC Control:** The CoC composition across these separate corporate debtors was largely identical. Either RCFL or Authum Investment & Infrastructure Limited (AAIL) acted as the primary secured financial creditor, wielding absolute majority voting share and dictating the direction of the process.

Evaluation of the SRA and Non Competitive Market Discovery

2.9.8 The integrity of the competitive market discovery process mandated by the Code was completely compromised by the repetitive, non-competitive selection of a singular, recurring entity as the Successful Resolution Applicant (SRA). Across the ten primary Corporate Debtors (CD-1 to CD-10), the resolution process consistently culminated in the selection of M/s Micro Capitals Private Limited as the sole SRA, while in the proceedings (CD-11 and

CD-12) featured common SRA i.e., West End Investment and Finance Consultancy Private Limited who submitted resolution plan in both the CD-11 & CD -12. This selection of the SRA pushed through by an overlapping, compromised CoC demonstrates that the bidding rounds were a procedural formality used to clear title to the corporate assets and permanently extinguish thousands of crore in liabilities under a single SRA.

Low Commercial Outcomes and Capital Erasure

- The RP submitted that the commercial wisdom of the CoC is supreme, that haircut decisions fall under the creditors' domain, and that he cannot be held responsible for low financial recoveries. However, the RP has forgotten that he is the Chairman of the CoC. While the CoC retains the final word on whether a resolution plan is viable, the RP as an officer of the Court, is the professional charged with ensuring that the "commercial wisdom" is based on complete and accurate information. By presenting such an information memorandums, allowing critical forensic audits to fail, and moving forward with plans based on unverified "NIL" values for hundreds of crore of intra-group loans, the RP fundamentally compromised the process relating to CD-7, CD-8, and CD-9 (The Approved Plan Group): In these three finalized proceedings, where resolution plans submitted by the common SRA, Micro Capitals Private Limited, received final approval, realisations were reduced to a statistic in decimal. Across these entities, aggregate admitted secured financial claims exceeding Rs.1,440 crore were extinguished through token, nominal cash outlays. Specifically, in Pifiniti Movies Private Limited (CD-9), an admitted secured financial debt of Rs.213.18 crore was settled for a mere Rs.13 lakh (representing a recovery rate of 0.006%); in Accura Productions Private Limited (CD-8), a massive claim of Rs.581.8 crore was wiped out for a fixed payout of Rs.8 lakh (a recovery rate of 0.014%). Across the entire approved group, net recoveries to lenders consistently stalled below fractions of a single percent.
- **CD-1 to CD-6 and CD-10 (The Pending CoC-Approved Group):** In the remaining seven primary CIRPs, the overlapping CoCs—wielded entirely by the common applicant or its assignees—voted to accept resolution plans from Micro Capitals Private Limited. Across these seven entities, total admitted claims stretching into thousands of crore of rupees were approved These plans are currently pending statutory approval before the Adjudicating Authority (AA).

Gross Dereliction of Duty Regarding SEBI Red Flags and Avoidance Transactions

2.9.9 The RP vehemently argued that he cannot act on "speculative or inferential suspicion," that the SEBI Order dated 22.08.2024 was directed at the lender (RHFL) rather than the borrowing CDs, and that his independent Transaction Auditors found no identifiable Preferential, Undervalued, Fraudulent, or Extortionate (PUFF) transactions. The DC notes the following: -

- The DC notes that the SEBI order was an important document, available in public domain, which explicitly mapped out a fraudulent, multi-layered siphoning scheme where thousands of crore in General Purpose Corporate Loans (GPCL) were systematically routed through these exact CDs to promoter-related shell entities. When the RP also took note of this order in his own Information Memorandums, he was required to bring interconnected facts of the aforesaid CDs before the AA for appropriate directions.

- The RP argues that because the Transaction Auditor's preliminary reports found no PUFF transactions, his duty was fully discharged. The DC notes that the statutory obligation to form an opinion and make a determination under Regulation 35A rests solely on the Resolution Professional. An external audit report is an evidentiary aid; it does not replace the RP's professional judgment.
- The statutory auditors explicitly noted that they were completely blocked from verifying asset recovery due to missing records, and they strongly recommended further investigations and a forensic audit.

2.9.10 Despite these clear warning signs, the RP blindly entered a "NIL" or "No" exposure on avoidance transactions in his Form CIRP-8 filings. By treating these multi-crore fund routings as simple, unrecoverable commercial write-off entities, the RP failed to form an opinion and file requisite applications under Sections 43, 45, 50, and 66 of the Code.

Delayed/Non-Filing of Section 19(2) Applications

2.9.11 The RP contended that he made continuous efforts to engage the suspended management, that Section 19(2) applications are a remedy of last resort, and that any delays were purely procedural and caused no prejudice to stakeholders. The DC notes as under: -

Tactical Delays in CD-10 (Edrishti Movies): In the CIRP of CD-10, the RP moved forward with the process, facilitated acceptance of an aggressive haircut plan, and formally filed the Section 19(2) non-cooperation application against the management in October 2025 after submission of resolution plan application before the AA in April 2025.

Total Omission in CD-9 (Pifiniti Movies): In the 10th CoC meeting for CD-9, held on 05.05.2025, the RP formally recorded that the suspended management was entirely non-cooperative and was actively blocking the Forensic Auditor. Yet, the RP never filed a Section 19(2) application.

2.9.12 Section 19(2) is not a discretionary tool or a procedural checklist item to be used after a plan approval application is filed. It is an enforcement tool designed to seize control of a debtor's financial history early in the process.

Failure to Report Systemic Suspicious and Coordinated Acts Before the Adjudicating Authority

2.9.13 The RP, Mr. Chandra Prakash Jain, fundamentally violated his role as an officer of the court by actively concealing the deceptive nature of these interconnected insolvency proceedings from the Adjudicating Authority (AA). Under Section 25(1) of the Code, an RP is legally mandated to preserve and protect the assets of the Corporate Debtor. Instead, Mr. Chandra Prakash Jain failed to disclose the severe, multi-layered siphoning frameworks red-flagged by SEBI and statutory auditors to the AA.

2.9.14 Even when statutory auditors explicitly warned that they were completely blocked from verifying asset recovery due to missing records and recommended forensic audit, the RP misreported these findings as regular commercial write-offs with "NIL" avoidance exposures. By suppressing these fatal institutional irregularities, delayed Section 19(2) filings and

presenting incomplete valuation reports, the RP did not merely demonstrate passive incompetence; he actively misled the AA into granting judicial approval to a syndicated, asset disposal mechanism designed to permanently extinguish debt.

- 2.9.15 This closed environment directly distorted the market discovery mechanism. The conduct of the resolution process including the invitation of Expressions of Interest (EOI), the preparation of the list of prospective resolution applicants (PRAs), and the final submission of resolution plans attracted only a restrictive and limited participation. This resulted in the exact same Successful Resolution Applicant (SRA), Micro Capitals Private Limited for CD-1 to CD-10 featuring across the processes. The commercial outcomes deliver a synchronized arrangement: in few CIRPs where resolution plans achieved final approval, the financial realizations to the creditors were completely derisory and fell below one percent, reflecting substantial and uncontested haircuts. In the remaining CIRPs, the resolution plans were similarly pushed through by the overlapping CoCs and were pending before the AA.
- 2.9.16 The extent of this pattern across multiple CIRPs points away from random coincidence and indicates a structured, coordinated framework designed with a pre-determined outcome of rapid corporate closure rather than a *bonafide* rescue or valuation maximizing exercise. The Code is designed to maximize asset value and rescue viable corporate entities. The RP cannot hide behind a "procedural" label when his passive conduct permitted an insolvency framework to be used as an tool to dispose the assets of the CD(s) and compromise creditor claims, leading to a blatant misuse of the IBC framework.
- 2.9.17 Accordingly, the DC holds Mr. Chandra Prakash Jain for violation of Sections 12(3), 19, 25(2)(j), 30(6), 65(1), 208(2)(a) and (e) of the Code and Regulations 35A, 40, 40B of the CIRP Regulations and Regulation 7(2)(a) and (h) of the IP Regulations read with Clauses 1, 2, 3, 13 and 14 of the Code of Conduct.

Contravention-II.

- 2.10 **Non-Filing of Requisite CIRP Forms with the Board requiring reporting on EOI, RFRP, Resolution Plan, etc.**
- 2.10.1 As per Regulation 40B of CIRP Regulations read with IBBI Circular No. IBBI/CIRP/85/2025 dated 26.05.2025 (revised CIRP forms), the Board requires an IP to report progress of the CIRP through specified forms on an electronic platform of the Board, as per the timelines stipulated against each Form to facilitate monitoring of the CIRP. Pursuant to Circular dated 26.05.2025, transition time till 30.09.2025 was provided for pending CIRP form filings.
- 2.10.2 Form CIRP 4 (revised Form CP-2) covers information regarding the CIRP from issuance of IM till issuance of request for resolution plan (RFRP) such as issuance of expression of interest (EOI), RFRP and modification thereof, evaluation matrix and modification thereof, etc. The due date of filing Form CIRP 4 is within seven days of the issue of RFRP under Regulation 36B and for the revised Form CP-2, on or before the 10th day of the subsequent month, after issuance of the RFRP.

A. Non-filing of Form CIRP 4 or CP-2 and Common Resolution Applicant Across CIRP

2.10.3 It was noted from the material available on record that in all the eleven CIRPs mentioned above, Mr. Chandra Prakash Jain did not file either Form CIRP 4 or CP-2. It was further observed that in ten CIRPs (CD-1 to CD-10), there was a common SRA, viz., Micro Capitals Private Limited. It was noticed that EOIs were received from a limited number of PRAs, being one or two in eight CIRPs (CD-1 to CD-4, CD-6, CD-7, CD-9 and CD-10), three in one CIRP (CD-8) and four in one CIRP (CD-5). In each CIRP, however, the resolution plan was submitted by only one of the PRAs viz., Micro Capitals Private Limited, which consequently emerged as SRA in all the ten CIRPs (CD-1 to CD-10).

B. Non-Filing of Form CIRP-3 and CIRP-6 with the Board

2.10.4 Form CIRP-3 (revised Form CP-2) provides details of progress in the CIRP from appointment of RP till issue of IM to members of the CoC, such as details of RP, applications seeking co-operation of management (if any), details in IM, etc. The due date of filing Form CIRP-3 is within seven days of issue of IM to members of the CoC under Regulation 36 of CIRP Regulations and revised Form CP-2 is on or before the 10th day of the subsequent month, after issuance of RFRP. In the CIRP of Hirma Power Limited (CD-5), it was observed that Form CIRP-3 or CP-2 was not filed by Mr. Chandra Prakash Jain.

2.10.5 Form CIRP-6 provides for reporting of specified events, including seeking extension of period of CIRP and exclusion of time, within seven days of occurrence of such events.

2.10.6 In the CIRP of RPL Star Power Private Limited (CD-2), it was observed from the orders of the AA dated 23.06.2025 and 14.08.2025 that Mr. Chandra Prakash Jain sought extension of CIRP period on two occasions, however, Form CIRP-6, which captures progress of CIRP including timelines and extensions, was not filed by Mr. Chandra Prakash Jain.

2.10.7 In the CIRP of Arion Movie Production Private Limited (CD-3), it was observed from CIRP 7 that extension of the CIRP period was sought by Mr. Chandra Prakash Jain. However, disclosure in Form CIRP-6 was not filed by Mr. Chandra Prakash Jain.

2.10.8 The non-filing of mandatory forms, which are specifically designed to capture key stages of the CIRP, including issuance of IM, EOI, RFRP, evaluation matrix, and extension of CIRP period, reflected a failure to discharge the reporting obligations cast upon the IP in the interest of transparency and proper conduct of the process. When considered in conjunction with the recurring pattern of a common SRA across multiple CIRPs having overlapping timelines, coupled with significantly low realisations for creditors, such non-compliance indicated a systemic lapse in ensuring transparency and proper regulatory reporting, and raised concerns regarding the integrity and competitiveness of the resolution process.

2.10.9 In view of the above, the Board held the *prima facie* view that Mr. Chandra Prakash Jain had contravened Section 208(2)(a) and (e) of the Code and Regulation 40B of the CIRP

Regulations and Regulation 7(2)(a) and (h) of the IP Regulations read with Clauses 1, 2, 3, 13 and 14 of the Code of Conduct.

Contravention-III.

2.11 Failure to file cost disclosures with the concerned Insolvency Professional Agency (IPA).

- 2.11.1 Clause 25A the Code of Conduct for the IP as specified in the first schedule of IP Regulations, provides that an IP shall disclose the fee payable to it, the fee payable to the IPE, and the fee payable to professionals engaged by it to the IPA of which he is a professional member, and the IPA shall publish such disclosure on its website. In terms of Circular No. IBBI/IP/013/2018 dated 12.06.2018, IP is required to file disclosure of fee and expenses for the tenure as RP in Form III to the IPA within seven days of demitting office as RP.
- 2.11.2 In the matter of Pifiniti Movies Private Limited (CD-9), it was noted that the resolution plan was approved on 25.09.2025. Accordingly, Mr. Chandra Prakash Jain was required to file disclosure of fee and expenses in Form III with the IPA within 7 days i.e. by 02.10.2025. However, the available records indicate that Mr. Chandra Prakash Jain failed to file the said disclosure with the IPA.
- 2.11.3 In view of the above, the Board held the *prima facie* view that Mr. Chandra Prakash Jain had contravened Section 208(2)(a) and (e) of the Code read with Regulations 7(2) (a) and (h) of the IP Regulations, Clause 25A of the Code of Conduct specified in First Schedule to IP Regulations and Circular No. IBBI/IP/013/2018 dated 12.06.2018

2.12 Submissions by Mr. Chandra Prakash Jain on contravention 2 and 3.

- 2.12.1 Mr. Chandra Prakash Jain submitted that he duly undertook all requisite filings on the IBBI portal within the prescribed timelines. Across all CIRPs handled, he ensured that all CIRP/CP forms were properly filed and duly authenticated in accordance with the CIRP Regulations. He acted in a *bonafide*, diligent, and professional manner, and there had been no intentional or deliberate non-compliance with any statutory filing requirement. Further, as a matter of practice, copies of the filed forms were downloaded and maintained in records for future reference.
- 2.12.2 He further submitted that any instances where forms were presently not available or visible on the IBBI portal are attributable solely due to non-reflection or technical issues on the portal, which were beyond his control. Once filings are duly completed on the designated electronic platform, any subsequent backend or system-related discrepancy cannot be attributed to the IP. He provided company-wise clarification based on records maintained by the IP is provided as under: -
1. CIRP of Celebrita Mediahouse Private Limited (CD-I) Form CIRP-4 was duly filed on 24.10.2024 within prescribed timelines. The filing was completed and authenticated.
 2. CIRP of RPL Star Power Private Limited (CD-2) Form CIRP-4 and CIRP-6 were duly prepared and submitted as per process. However, the same are presently not reflecting on the

portal. It was submitted that extension-related filings were undertaken in line with CIRP developments, and any non-reflection on the IBBI website is technical in nature.

3. CIRP of Arion Movie Production Private Limited (CD-3) Form CIRP-4 was duly filed on 31.10.2024. With respect to CIRP- 6 (extension-related filing), the same was undertaken; however, it was currently not visible on the portal due to technical issues.

4. CIRP of Azalia Distribution Private Limited (CD-4) Form CIRP-4 was duly filed on 14.12.2024 within the prescribed period. Full compliance was ensured.

5. CIR P o f Hirma Power Limited (CD-5) Form CIRP-4 was duly filed on 22.01.2025. With respect to CIRP-3 / CP-2 (IM related filing), the same was duly undertaken; however, it is presently not reflecting on the portal.

6. CIRP of Tulip Advisors Private Limited (CD-6) Form CIRP-4 was duly filed on 25.10.2024 in compliance with applicable timelines.

7. CIRP of Thwink Big Content Private Limited (CD-7) Form CIRP-4 /CP -2 was duly filed on 31.10.2024.

8. CIRP of Accura Productions Private Limited (CD-8) Form CIRP-4 / CP-2 was duly filed on 31.10.2024.

9. CIRP of Pifiniti Movies Private Limited (CD-9) Form CIRP-4 / CP-2 was duly filed on 25.10.2024. With respect to Form III, the same was also undertaken; however, it was currently not reflecting on the portal.

10. CIRP of Edrishti Movies Private Limited (CD-10) Form CIRP-4 / CP-2 was duly filed on 25.10.2024 within prescribed timelines.

11. CIRP of Triumvirate Sorority Private Limited (CD-11)- the filing process for Form CIRP-4 / CP-2 was duly initiated and undertaken. Any present non-reflection or incomplete display on the portal was attributable to system-related issues.

2.13 Analysis and Findings of the DC.

A. Non-Filing of CIRP Forms

2.13.1 Mr. Chandra Prakash Jain submitted that all requisite forms were duly prepared, filed, and authenticated on the IBBI portal in each of the eleven CIRPs, and that any present non-reflection of certain forms, specifically Form CIRP-4/CP-2 and CIRP-6 for CD-2, CIRP-6 for CD-3, and CIRP-3/CP-2 for CD-5, was attributable to technical or backend issues on the portal that were beyond his control, and not to non-filing.

- 2.13.2 The DC notes that the obligation under Regulation 40B is not discharged merely by an IP's internal record-keeping or by the act of attempting to upload a form. The Board's electronic platform is used to monitor progress of a CIRP, and it is the IP's responsibility to ensure that a filing is duly registered and reflected thereon, and to verify the same. Mr. Chandra Prakash Jain has not placed on record any acknowledgment, system-generated receipt, screenshot, error log, or correspondence with the Board's helpdesk evidencing that the forms in question were in fact submitted and that their non-reflection is attributable to a portal malfunction rather than non-filing. A bare assertion that filings were "undertaken" but are "presently not reflecting on the portal," unsupported by any contemporaneous proof of submission, does not discharge the burden of demonstrating compliance.
- 2.13.3 The DC further notes that this is not an isolated or one-off lapse confined to a single CIRP, where a technical glitch may more plausibly be accepted. The pattern of non-filing recurs across multiple CDs and multiple form types, each attributed to the same generic explanation of portal non-reflection. The recurrence of an identical, unverified explanation across distinct filings and distinct CDs, without any independent corroboration in even a single instance, weakens rather than supports the credibility of the explanation.
- 2.13.4 The DC also notes that this non-compliance is not merely a technical or inconsequential lapse in isolation. These Forms are specifically designed to make an IRP/RP accountable and also monitor key events in the CIRP i.e., issuance of RFRP, the evaluation matrix, and extensions of the CIRP timeline. The failure to file these forms must be read alongside the finding recorded under Contravention-I which points to a material lapse in transparency. The statutory obligation under Regulation 40B is one of strict and timely compliance, and the failure to discharge it, viewed cumulatively across multiple CIRPs and form types, reflects a systemic lapse in regulatory reporting rather than an inadvertent, isolated error or just negligence.
- 2.13.5 Mr. Chandra Prakash Jain submitted that the filed forms were downloaded and kept in records for future reference. But no copy of such downloaded record was submitted by Mr. Chandra Prakash Jain, in his defence for such forms where copies were not visible on the portal. In view of the foregoing, the DC holds the contravention.

B. Failure to File Cost Disclosure (Form III) with the IPA

- 2.13.6 The resolution plan in the matter of CD-9 was approved on 25.09.2025, and the disclosure in Form III was accordingly due to be filed with the IPA by 02.10.2025, in terms of Clause 25A of the Code of Conduct read with Circular No. IBBI/IP/013/2018 dated 12.06.2018. The record available does not reflect that the said disclosure was filed by Mr. Chandra Prakash Jain within the prescribed period as presently it was showing to be filed on 06.04.2026 after the issuance of SCN on 30.03.2026.
- 2.13.7 The DC has considered the submissions of Mr. Chandra Prakash Jain. The general submission that all requisite filings across the eleven CIRPs were duly undertaken and authenticated, and that any non-reflection is attributable to portal-related or technical issues, has also been advanced in respect of the Form III filing for CD-9. For the reasons already recorded at

paragraphs 2.13.1 - 2.13.5, this explanation, in the absence of any acknowledgment, system-generated receipt, or other contemporaneous proof of submission to the IPA, does not establish that the disclosure was in fact filed within the time prescribed. In view of the foregoing, the DC holds the contravention.

Contravention-IV.

2.14 Observations in the matter of CIRP of Transmissions International India Pvt. Ltd. (CD-12)

- 2.14.1 In the matter of Transmissions International India Pvt. Ltd., voluntary liquidation process had commenced on 22.02.2024 and Mr. Chandra Prakash Jain were appointed as the liquidator in the said process on 18.09.2024.
- 2.14.2 The Board received a complaint against Mr. Chandra Prakash Jain in the matter of voluntary liquidation process of the CD. The copy of the complaint was shared with Mr. Chandra Prakash Jain *vide* email dated 06.10.2025 thereby seeking reply of Mr. Chandra Prakash Jain to the allegations in the complaint. Mr. Chandra Prakash Jain submitted his reply *vide* email dated 13.10.2025. Subsequently, additional information/ documents were sought *vide* email dated 14.01.2026 which were submitted by him on 15.01.2026.
- 2.14.3 The Board examined the allegations raised in the complaint vis-à-vis reply of Mr. Chandra Prakash Jain to the same and material available on record. Based on such examination, the Board had observed as follows:

A. Withdrawal of Remuneration without Approval

- 2.14.4 Regulation 5(1) of the IBBI (Voluntary Liquidation Process) Regulations, 2017 (VL Regulations) provides as under: -

“5. Appointment of liquidator

(1) Subject to regulation 6, the corporate person shall appoint an insolvency professional as liquidator, and, wherever required, may replace him by appointing another insolvency professional as liquidator, by a resolution passed under clause (c) of sub-section (3) of section 59 or clause (c) of sub-regulation (1) of regulation 3, as the case may be:

Provided that such resolution shall contain the terms and conditions of appointment of the liquidator, including the remuneration payable to him.”

- 2.14.5 It was noted that Mr. Chandra Prakash Jain failed to provide any document or resolution evidencing that his remuneration was fixed or approved by the shareholders or contributories of the CD, either at the time of his appointment as liquidator or subsequently as mandated under VL Regulations. Thus, in the absence of such approval, the withdrawal of remuneration from the voluntary liquidation bank account lacks required sanction and points to unauthorised utilisation of liquidation funds. It was also noted that the AA in its order dated 12.02.2026 observed that Mr. Chandra Prakash Jain charged and also incurred expenses which were beyond the limits laid down by the VL Regulations.

- 2.14.6 The unilateral fixation and withdrawal of fees by Mr. Chandra Prakash Jain, without any disclosure or approval of stakeholders, appeared to be in contravention with the fiduciary duties of a liquidator and raised issues of integrity and ethics.
- 2.14.7 Thus, the Board held a *prima facie* view that Mr. Chandra Prakash Jain had contravened Regulation 5 of the VL Regulations read with Clauses 1, 14, 25 and 26 of the Code of Conduct for IPs specified in First Schedule to IP Regulations.

B. Delay and/or Failure to file relationship disclosure for engagement of professionals

- 2.14.8 Clause 8B and Clause 8C of the Code of Conduct, specified in the first schedule of the IP Regulations read with erstwhile Circular dated 16.01.2018 mandate that an IP shall make relationship disclosures within three days of engagement of any professional, on the website of the IPA.
- 2.14.9 It was noted that Mr. Chandra Prakash Jain had engaged the IPE for support services and V.M. Shah & Co. as accountant on 01.10.2024 and 20.12.2024, respectively, during the voluntary liquidation process. However, the relationship disclosures in respect of these appointments were filed on 23.01.2025, with delays of 111 days and 31 days, respectively. It was further noted that Mr. Chandra Prakash Jain did not file any relationship disclosure with the IPA despite engaging professionals viz., Mehul Thakker & Co., Mehul S Patel & Associates and Jain Kedia & Sharma, on 07.10.2024, 05.10.2024 and 06.03.2025, respectively.
- 2.14.10 Thus, the Board held a *prima facie* view that Mr. Chandra Prakash Jain had contravened clauses 8B and 8C of the Code of Conduct for IPs specified in First Schedule to IP Regulations read with erstwhile Circular dated 16.01.2018 and Clauses 13 and 14 of the Code of Conduct.

C. Failure to submit compliant Status Report and Maintenance of Records

- 2.14.11 Regulation 37(2)(b) of VL Regulations states that the status report shall indicate progress in liquidation, including settlement of list of stakeholders, details of any assets that remains to be sold and realized, distribution made to the stakeholders, distribution of unsold assets made to the stakeholders, developments in any material litigation, by or against the corporate person, filing of, and developments in applications for avoidance of transactions in accordance with Chapter III of Part II of the Code and the reasons for not completing the process within stipulated time period and the additional time required for completing the process, the audited accounts of the liquidation showing the receipts and payments pertaining to liquidation since the liquidation commencement date.
- 2.14.12 It was observed that in the Status Report submitted by Mr. Chandra Prakash Jain, the following mandatory elements required under Regulation 37 were not covered or inadequately covered:
- i. Settlement of List of stakeholders – The report did not provide a complete and verified list of stakeholders, details of claims admitted/rejected, nor did it provide for reconciliation with the affidavit of solvency.

- ii. Asset realisation details – There was no description of the mode of realisation, amounts realised, assets remaining unsold, or justification for delays in realisation in the status note.
- iii. Distribution made to stakeholders – The report did not provide a stakeholder-wise distribution statement showing amounts distributed, dates of distribution, and compliance with the statutory waterfall mechanism.
- iv. Liquidation cost break-up – While certain payments were narrated, the report did not contain a structured and consolidated statement of liquidation costs which the regulation intended, professional fees, and other expenses.
- v. Bank account reconciliation – Regulation 37 of the VL Regulation further requires disclosure of receipts and payments during the reporting period; however, a reconciled statement of the voluntary liquidation bank account was also not provided.
- vi. Timeline and reasons for delay – There was no explanation for the delays in completion of liquidation or milestones achieved vis-à-vis the liquidation commencement date, as required under Regulation 37 of the VL Regulation.
- vii. Consultations and stakeholder decisions – Minutes or outcomes of stakeholder consultations, if any, were not placed on record, nor was there any disclosure of approvals obtained for key actions.

2.14.13 It was further observed that *vide* engagement letter dated 20.12.2024, Mr. Chandra Prakash Jain appointed V.M. Shah & Co. specifically for completion of the books of account for FY 2023–24. However, it was noted from the Status Report filed by Mr. Chandra Prakash Jain for the period 22.02.2024 to 22.02.2025 that despite assuming charge on 24.09.2024, the books of account for FY 2023–24 was not prepared.

2.14.14 The duty to maintain proper books of account, registers, and stakeholder documentation under Regulations 8(1), 30 and 41 of the Voluntary Liquidation Process Regulations is mandatory. Further, the status note is intended to assist the AA to overseeing the process. However, the status note prepared in the present matter appeared to be perfunctory in nature and a mere formality, without due adherence to the statutory obligations associated with it. Accordingly, the failure to submit a compliant and updated status report, along with the failure to maintain updated statutory records, reflected a lack of due diligence, transparency, and professional competence expected of an IP

2.14.15 Thus, the Board held the prima facie view that Mr. Chandra Prakash Jain had contravened Regulation 37 (2) (b) read with Regulations 8(1), 30 and 41 of the VL Regulations and Clause 14 and 19 of the Code of Conduct for IPs specified in First Schedule to IP Regulations.

2.15 Submissions by Mr. Chandra Prakash Jain.

2.15.1 Mr. Chandra Prakash Jain denied the allegation of unauthorised withdrawal. It was submitted that remuneration was consistent with market practice, stakeholders were aware, and no objection was raised contemporaneously. Any procedural gap was curable and not *malafide*.

2.15.2 On relationship disclosures, he submitted that the delays, if any. were unintentional, due to administrative oversight. He submitted that no conflict of interest existed.

2.15.3 On status report and records, he denied the contravention and submitted that the status report reflected substantial compliance, covered material aspects of liquidation. Any deficiency was thus, procedural in nature and entirely capable of rectification.

2.15.4 He further submitted that the SCN failed to establish any intentional misconduct, any personal gain or any collusion or fraud. At best, the allegations relate to procedural lapses and/or interpretational differences or systemic issued beyond the control of the RP. Without prejudice he submitted that he was willing to rectify the procedural lapses, file pending forms, if any and provide any additional disclosures as may be required.

2.16 **Analysis and Findings of the DC.**

Withdrawal of Remuneration without Approval

2.16.1 The DC notes that Regulation 5(2) of the VL Regulations provides that the remuneration payable to the liquidator must be fixed by the corporate person in the resolution appointing the liquidator, or, where the liquidator is replaced, by the contributories in the resolution appointing the new liquidator. The fixation of remuneration is therefore not a matter left to the liquidator's own discretion or to subsequent ratification. It is a pre-condition that must be reflected in the appointing resolution itself. Mr. Chandra Prakash Jain submitted that the remuneration drawn was consistent with the market practice, that stakeholders were aware of the same, and that no contemporaneous objection was raised. The DC is unable to accept this submission as an answer to the charge. Awareness of stakeholders, is not a substitute for the specific procedural requirement under Regulation 5(2), which requires fixation by way of a resolution. Mr. Chandra Prakash Jain did not place on record any resolution, whether at the time of his appointment or subsequently, fixing or approving his remuneration. In the absence of such a resolution, the withdrawal of remuneration from the liquidation account was without the sanction that Regulation 5(2) makes mandatory. The DC also notes that this was not merely a matter of internal procedural compliance. The AA, also in its order dated 12.02.2026, recorded that Mr. Chandra Prakash Jain charged higher amount and incurred expenses beyond the rules of IBBI. Though ultimately the matter was settled between the Company and Mr. Chandra Prakash Jain therefore the matter was dismissed by the AA.

2.16.2 The submission that the lapse, if any, was "procedural" and "curable" does not address the fact that liquidation funds, held in a fiduciary capacity for the benefit of stakeholders, were utilised without the authorisation that the VL Regulations specifically require for such utilisation. The unilateral fixation and withdrawal of fees, without stakeholder approval, goes to the integrity of the liquidator's conduct and cannot be treated as a mere technical irregularity. In view of the foregoing, the DC holds the contravention.

B. Delay in Filing Relationship Disclosures

2.16.3 The record shows that Mr. Chandra Prakash Jain engaged Truue IPE LLP for the support services on 01.10.2024 and V.M. Shah & Co. was engaged as accountant on 20.12.2024, yet

the relationship disclosures in respect of both engagements were filed only on 23.01.2025, with delay of 111 days and 31 days respectively. It is further on record that no relationship disclosure was filed at all in respect of the three other professionals engaged by Mr. Chandra Prakash Jain, namely Mehul Thakker & Co. (engaged 07.10.2024), Mehul S Patel & Associates (engaged 05.10.2024), and Jain Kedia & Sharma (engaged 06.03.2025).

2.16.4 Mr. Chandra Prakash Jain submitted that the delay, if any, were unintentional and attributable to administrative oversight, and that no conflict of interest existed in respect of any such engagement. The DC holds the contravention.

C. Non-Compliant Status Report and Failure to Maintain Records

2.16.5 The Board's examination of the Status Report filed by Mr. Chandra Prakash Jain identified the absence, or material inadequacy, of seven distinct elements mandated by the Regulation: a complete and reconciled list of stakeholders, asset realisation details, a stakeholder-wise distribution statement, a consolidated liquidation cost break-up, bank account reconciliation, an explanation for delay, and disclosure of stakeholder consultations. Mr. Chandra Prakash Jain submitted that the Status Report reflected "substantial compliance" and covered the material aspects of the liquidation, and that any deficiency was procedural and capable of rectification. The submission does not address any of the seven specific deficiencies identified; and it offers a general assertion of substantial compliance without addressing, why the list of stakeholders was incomplete, why asset realisation and distribution were not particularised, or why bank reconciliation was absent. In view of the same, the DC finds that the Status Report filed by Mr. Chandra Prakash Jain did not comply with the requirements of Regulations and holds the contravention.

3. Conclusion.

3.1. In view of the forging, this DC finds that

- a) a dense, multi-layered matrix of structural overlaps across eleven highly distressed Corporate Debtors revealed a coordinated mechanism engineered to dispose assets rather than achieve economic revival of the CDs.
- b) the entire insolvency ecosystem was managed by a single network, including a common applicant creditor (RCFL/Global Wind), a common RP and IPE (Mr. Chandra Prakash Jain and True IPE LLP).
- c) the CoC composition across these separate corporate debtors was largely identical, with RCFL or AIIL wielding absolute majority voting share to dictating the direction of the process.
- d) the RP completely ignored a severe SEBI regulatory indictment that mapped out a multi-layered siphoning scheme routing corporate loans through these exact debtors to promoter shell entities. The RP wrongly relied on preliminary transaction audit reports to declare "NIL" avoidance exposures, ignoring his independent statutory duty to form an opinion on clawback transactions.

- e) the integrity of the bidding process was entirely compromised by the non-competitive, repetitive selection of M/s Micro Capitals Private Limited in CD-1 to CD-10 as the sole Successful Resolution Applicant.
- f) approved resolution plans resulted in realisation in decimal (less than 1% realisation), as shown in tabular below:

Sr. no.	CD	Claims (Rs.)	Realisation	SRA
1.	Thwink Big Content Pvt. Ltd. (CD-7)	648.67 crore	Rs. 9 lakh (0.014%)	Micro Capitals Private Limited
2.	Accura Productions Pvt. Ltd. (CD-8)	581.80 crore	Rs. 8 lakh (0.014%)	
3.	Pifiniti Movies Private Limited (CD-9)	213.18 crore	Rs. 13 lakh (0.014%)	
4	CD-1 to 6 and CD- 10	Pending approval before AA		

- g) the RP delayed Section 19(2) application by waiting for months after submitting a resolution plan to file for non-cooperation in CD-10 and completely omitting a Section 19(2) filing in case of CD-9.
- h) the RP has failed to file relevant CIRP forms, Cost and relationship disclosures before the before the Board and IPA respectively in certain cases.
- 3.2. The DC notes that Mr. Chandra Prakash Jain, despite being in possession of material information concerning the ten CDs under his assignments, failed to bring to the notice of the AA the apparent structural and procedural similarities across the insolvency resolution processes or seek appropriate directions. The CIRPs exhibited several common features, including initiation by the same financial creditor for CD-1 to CD-10, constitution of the CoC by a common financial creditor, similar financial position and transaction patterns, involvement of a common successful resolution applicant, and consistently low realisations for CD-7 to CD-9. These circumstances were sufficient to put a prudent and diligent insolvency professional on notice that the CIRPs are part of a coordinated arrangement intended to achieve pre-determined outcomes, thereby warranting judicial scrutiny. Mr. Chandra Prakash Jain, as RP, failed to utilise his vintage and privileged position, which gave him knowledge of all the CDs undergoing these coordinated CIRPs, and failed to exercise the professional competence and diligence expected of him by bringing the apparent misuse of the IBC process to the attention of the AA. His omission defeated the very objectives of the IBC. Instead of acting to prevent such abuse, the RP remained a mute spectator and, in his capacity as Chairperson of the CoC, facilitated rather than questioned or resisted the continuation of these coordinated CIRPs. Such conduct is inconsistent with the standards of independence, and professional diligence expected from an insolvency professional under the Code.
- 3.3. The DC finds that the aforesaid conduct is in violation of Clause 1 of the Code of Conduct, which mandates that an insolvency professional shall maintain integrity by being honest, straightforward and forthright in all professional relationships. Having noticed material facts

indicating a possible abuse of the insolvency process, Mr. Chandra Prakash Jain failed to act with the candour and forthrightness expected of him by not placing such facts before the AA.

- 3.4. The conduct also violates Clause 2 of the Code of Conduct, which requires an insolvency professional not to misrepresent any facts or situations and to refrain from being involved in any action that would bring disrepute to the profession. By remaining silent on the existence of multiple common features across the CIRPs and facilitating the continuation of the processes without inviting judicial scrutiny, Mr. Chandra Prakash Jain failed to present the complete factual position before the AA, thereby depriving the AA of the opportunity to examine the malicious initiation of the insolvency proceedings, and to pass appropriate orders. Such suppression of material facts is inconsistent with the standards of transparency and professional conduct expected of an insolvency professional and constitutes a violation of Clause 2 of the Code of Conduct. Consequently, Mr. Chandra Prakash Jain's conduct amounts to a gross violation of his duties as an officer of the Court, as he failed to make a full and fair disclosure of material facts necessary to enable the AA to effectively exercise its jurisdiction under the Code.
- 3.5. Further, Mr. Chandra Prakash Jain has violated Clause 3 of the Code of Conduct, which requires an insolvency professional to act with objectivity by ensuring that professional decisions are taken without bias, conflict of interest, coercion or undue influence of any party. The repeated occurrence of identical stakeholders, similar transaction patterns, common resolution applicant and similar unwarranted outcomes across the CIRPs demanded an objective and independent assessment of the legitimacy of the proceedings. His failure to independently evaluate these circumstances and to seek appropriate directions from the AA demonstrates a lack of the objectivity expected of an insolvency professional.
- 3.6. The DC also holds that Mr. Chandra Prakash Jain has violated Clause 14 of the Code of Conduct, which mandates that an insolvency professional shall neither act with malafide nor be negligent while performing his functions and duties under the Code. The failure to identify, investigate and report material circumstances indicating a possible coordinated misuse of the insolvency framework, despite the availability of sufficient information in his possession, constitutes negligence in the discharge of his statutory duties. Such omission undermines the integrity of the insolvency process and is contrary to the objectives and spirit of the Code.
- 3.7. Accordingly, the DC holds that Mr. Chandra Prakash Jain failure to disclose material facts, exercise independent professional judgment, maintain objectivity and act with the requisite diligence resulted in the conduct and culmination of the CIRPs in a manner inconsistent with the objectives of the Code. The operational history of the eleven CIRPs reveals a profound and systemic misuse of the IBC framework. The primary objective of the Code is to breathe life back into distressed corporate entities or, failing that, ensure an honest and transparent liquidation that maximizes returns for lenders. The Resolution Professional is an institution of public trust. The RP is an officer of the Court vested with extensive powers to act as an uncompromised custodian of the corporate estate. He cannot act as a facilitator who blindly executes the instructions of a, compromised and overlapping CoC and a single recurring SRA. The IBC is an economic legislation enacted for the maximization of asset value, promotion of entrepreneurship, and balancing the interests of all stakeholders. It cannot, under any

circumstances, be reduced to a tool for strategic corporate burial, collusive debt extinguishment, or connivance to shelter fraudulent promoters from the reaches of law.

4. Order

- 4.1. In view of the foregoing discussions, the DC finds that Mr. Chandra Prakash Jain has violated the Sections 12(3), 18(a), 19, 25(2)(j), 30(6), 65(1), 208(2)(a) and 208(2)(e) of the Code, Regulations 35A, 40, 40A and 40B of the CIRP Regulations, Regulations 7(2)(a), 7(2)(h) of the IP Regulations, Regulations 5(2), 8(1), 30, 37(2)(b) and 41 of the Voluntary Liquidation Process Regulations, Clauses 1, 2, 3, 8B, 8C, 13, 14, 19, 25, 25A and 26 of the Code of Conduct, Circular No. IBBI/IP/OI 3/2018 dated 12.06.2018 and Circular No. IBBI/CIRP/85/2025 dated 26.05.2025.
- 4.2. Therefore, the DC, in exercise of the powers conferred under Section 220 of the Code read with Regulation 13 of the IBBI (Inspection and Investigation) Regulations, 2017 hereby cancels the registration of Mr. Chandra Prakash Jain (Registration No. IBBI/IPA-001/IP-P00147/2017-2018/10311). Mr. Chandra Prakash Jain is barred from taking any future action/assignment under the IBC.
- 4.3. This order shall come into force after 30 days from the date of issuance of this order.
- 4.4. A copy of this order shall be forwarded to the Indian Institute of Insolvency Professional of ICAI (IIPI) where Mr. Chandra Prakash Jain is enrolled as a member.
- 4.5. A copy of this order shall also be forwarded to the Registrar of the Principal Bench of the National Company Law Tribunal, New Delhi, for information.
- 4.6. A copy of this order shall be forwarded to Head Office, Directorate of Enforcement for information.
- 4.7. Accordingly, the show cause notice is disposed of.

-sd/-

(Jayanti Prasad)

Whole Time Member

Insolvency and Bankruptcy Board of India

-sd/-

(Ravi Mital)

Chairperson

Insolvency and Bankruptcy Board of India

Dated: 03 July 2026

Place: New Delhi