



भारतीय प्रतिभूति और विनियम बोर्ड
Securities and Exchange Board of India

Recovery and Refund Department
Recovery Division III
Tel: 022-4045-9127
pankajs@sebi.gov.in

CERTIFICATE No. 9286 of 2026

**Certificate under section 28A of the Securities and Exchange Board of India Act, 1992
read with section 222 of the Income Tax Act, 1961**

Navnit Gadoya
B-406, Yashodhan Building, Bhau Saheb Bagwe
Road, Dahisar Bridge, Mumbai – 400068

PAN: AQNPG4727F

**NOTICE OF DEMAND UNDER RULE 2 OF THE SECOND SCHEDULE TO THE
INCOME-TAX ACT, 1961 READ WITH SECTION 28A OF THE SECURITIES AND
EXCHANGE BOARD OF INDIA ACT, 1992**

1. This is to certify that a sum of Rs. 5,26,000/- (Rupees Five Lakh Twenty-Six Thousand Only) along with further interest, all costs, charges and expenses incurred in respect of all the proceedings taken for recovery of the said sum as detailed below is due to SEBI from you:

Description of Dues	Amount (in Rupees)
Penalty imposed by the AO vide Order No. Order/AK/DS/2026-27/32398-32400 dated 29.04.2026 in the matter of Front Running by Navnit Gadoya, Chiranggi Irish Shah and Surbhi Aggarwal	5,00,000
Interest from April 2026 to August 2026 @ 1% p.m.	25,000
Recovery cost	1,000
Total	5,26,000

2. You are hereby directed to pay the total amount as mentioned above within 15 (Fifteen) days of the receipt of this Notice (by way of direct credit through EFT/NEFT/RTGS to A/c No. SEBIRRD PEN9286 of ICICI Bank, IFS code – ICIC0000106 (OR) online payment facility available on the “Recovery Payment” module on the website: <https://siportal.sebi.gov.in> (OR) payment link available on the following path: SEBI Website > Enforcement > Recovery Proceedings > Pay Now) failing which the Recovery Officer shall proceed to recover the amount due in accordance with the provisions of section 28A of the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) read with sections 220 to 227, 228A, 229 and 232 of the Income-tax Act, 1961 and the Second Schedule to the said Act and the rules made thereunder.

सेबी भवन, “जी” ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, मुंबई – 400 051
SEBI Bhavan, “G” Block, Bandra Kurla Complex, Mumbai – 400 051
www.sebi.gov.in | 02212644 9000 / 4045 9000



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3. In the event of non-payment of the dues as above, SEBI shall recover the money by one or more of the following modes, namely: -
- attachment and sale of your movable property;
 - attachment of your bank accounts;
 - attachment and sale of your immovable property;
 - arrest and detention in prison;
 - appointing a receiver for the management of your movable and immovable properties.
4. Further, as per Explanation 1 to section 28A of the SEBI Act, any direct or indirect transfer of your property or monies held in bank accounts to your spouse or minor child or son's wife or son's minor child, otherwise than for adequate consideration, on or after 29.04.2026, shall be deemed to be your property or money for the purpose of recovery.
5. You are also advised to take note that upon service of this notice, you are not competent to mortgage, charge, lease or otherwise deal with any property belonging to you except with the permission of the Recovery Officer and any such transfer shall be deemed void as per rule 16 of the Second Schedule to the Income-tax Act, 1961 read with section 28A of the SEBI Act.
6. Any confirmation of e-payment(s) made (in the format as given in table below) should be forwarded to "The Recovery Officer, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C - 4 A, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051." or sent by email to kapilsankhla@sebi.gov.in / pankajs@sebi.gov.in

1. Case Name and Recovery Certificate Number :	
2. Name of Payee :	
3. Date of Payment:	
4. Amount Paid :	
5. Transaction No. :	
6. Bank Details from which payment is made :	

Note: In the absence of confirmation of e-payment as per the above format, the credits made will not be accounted towards your dues.



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7. In addition to the aforesaid dues, you will also be liable for further interest, all costs, charges and expenses incurred in respect of recovery proceedings against you.

Dated: August 19,2026

Recovery Officer

Copy to: Depositories and All Mutual Funds in India with a request to provide the holding details of Navnit Gadoya (PAN: AQNPG4727F) immediately by return e-mail and intimate to the Recovery Officer in case any sale or redemption request received from the defaulter after the date of this Notice of Demand.