SECURITIES AND EXCHANGE BOARD OF INDIA
NORTHERN REGIONAL OFFICE,
NBCC COMPLEX, OFFICE TOWER-1,
8TH FLOOR, PLATE B, EAST KIDWAI NAGAR, NEW DELHI – 110023

Certificate No. 9059of 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

Mr. Naresh Pal (Proprietor of Equity Mantra) **PAN: DPDPP1122R**
Tehsil Kasganj, Nagla Mohan/Badanpur,
Goyati, Kasganj
Uttar Pradesh-207403

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.

This is to certify that a sum of **Rs. 84,97,514/-** *(Rupees Eighty-Four Lakh Ninety-Seven Thousand Five Hundred & Fourteen 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 Rs.)
Amount directed to be refunded to the investors by the QJA vide Order No. **QJA/AA/NRO/NRO/30582/2024-25** dated **July 24, 2024** in the matter of **Unregistered Investment Advisory Services by Equity Mantra (Proprietor: Mr. Naresh Pal)**	**70,21,912/-**
Interest from **July 2024 to March 2026 @ 1 % per month**	**14,74,602/-**
Recovery Cost	**1,000/-**
Total	**84,97,514/-**

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. SEBIRNCIS9059 namely SEBI Recovery Proceeds Account of Bank Of India, IFSC code – BKID00VAN04 (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.

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: -
(a) Attachment and sale of your movable property;
(b) Attachment of your bank accounts;
(c) Attachment and sale of your immovable property;
(d) Arrest and detention in prison;

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(e) 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 1992, 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 July 24, 2024 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, 1992.

6. Any confirmation of e-payment(s) made (in the format as given in table below) should be forwarded to "The Recovery Officer, Recovery Division , Securities and Exchange Board of India, NBCC Complex, Office Tower-1, 8th Floor, Plate B, East Kidwai Nagar, New Delhi - 110023" or sent by email to: **recoverynro@sebi.gov.in**, **vinayak@sebi.gov.in** and **rajank@sebi.gov.in**.

Case Name and Recovery Certificate Number:	
Name of Payer:	
Date of Payment:	
Amount Paid:	
Transaction No.:	
Bank Details (Bank Name, Branch Name, IFSC Code and Account No.) 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.

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.

—Signed

Date: 09.03.2026

RECOVERY OFFICER

राजन कुमार / Rajan Kumar
वसूली अधिकारी एवं उप महाप्रबंधक
Recovery Officer & Deputy General Manager
भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India
उत्तरी प्रादेशिक कार्यालय / Northern Regional Office
नई दिल्ली / New Delhi

Copy to: Depositories and All Mutual Funds in India (by e-mail)

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SEBI
Securities and Exchange Board of India