

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. 9296 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

Manish Mishra (PAN:AMPPM6823L) C 11 The North Park Adani Shantigram S G Highway Vaishnav Devi Circle Ahmedabad, Gujarat- 382421	Gaurav Gupta (PAN:AKHPG5185D) 15 A Bela Road Civil Lines, Delhi 110054
Subhash Agarwal (PAN:AAEPA6699R) 73 Kailash Hills East of Kailash, south Delhi New Delhi 110065	Pooja Aggarwal (PAN:AGMPA6216C) 493 FF, Kothi block B Meera Bagh, Paschim Vihar Delhi 110063
Rakesh Kumar Gupta (PAN: AAEPG2752R) 15 A Bela Road Civil Lines Delhi 110054	

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. 1,74,79,590/-/- (Rupees One Crore Seventy-Four Lakhs Seventy-Nine Thousands Five Hundred Ninety 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 disgorged by WTM vide Order No. WTM/AB/ISD/ISD-SEC-5/31442/2025-26 dated May 29, 2025 in the matter of In the matter of trading based stock recommendations using social media YouTube in the scrip of Sadhna Broadcast Ltd.	1,49,38,966/-
Interest from May 2025 to September 2026 @ 1% p.m.	25,39,624/-
Recovery Cost	1,000/-
Total	1,74,79,590/-

2. You are hereby directed to pay the total amount as mentioned above within 15 (Fifteen) days of the receipt of this Notice **(DD shall be drawn in favour of the "SEBI Recovery Proceeds" Account payable at Mumbai (OR) EFT/NEFT/RTGS to**



Account No. SEBIRRDDSG9296 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")**

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 p:-
 - 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;
 - 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, 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 May 29, 2025 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, 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, deepshikhaL@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 the 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.

Dated: September 08, 2026



— Signed

Recovery Officer
राजन कुमार/Rajan Kumar
वसुली अधिकारी एवं उपाय 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