



SECURITIES AND EXCHANGE BOARD OF INDIA
Western Regional Office

PROHIBITORY ORDER NO. RO/ 1537/2026

Order under Section 28A of the Securities and Exchange Board of India Act, 1992 read with Rule 16, 48 and 51 of the Second Schedule to the Income-tax Act, 1961

In Recovery Certificate No. 6956 and 6968 of 2023

Recovery Certificate No	Name of Defaulter	PAN	Address
6956	Ms Sudha Mahendra Agrawal	ACRPA9590N	No.5, Royal Crescent, Near Asopalav Bungalows, Thaltej, Ahmedabad, Gujarat - 380059
6968			

1. Securities and Exchange Board of India (hereinafter referred to as 'SEBI') has initiated following recovery proceedings against **Ms Sudha Mahendra Agrawal (PAN: ACRPA9590N)** residing at No.5, Royal Crescent, Near Asopalav Bungalows, Thaltej, Ahmedabad, Gujarat – 380059 for non-compliance with SEBI order WTM/AB/IVD/ID1/18233/2022-23 dated July 29, 2022:

Recovery Certificate	Date of Notice of Demand	Amount (in Rs.)
6956 of 2023	July 27, 2023	33,91,000/- along with further interest, costs, expenses and charges etc
6968 of 2023	July 27, 2023	15,76,000/- along with further interest, costs, expenses and charges etc

2. Notices of Demand dated July 27, 2023 have been issued to Ms Sudha Mahendra Agrawal by the Recovery Officer directing the Defaulter to make payment of the respective amounts along with further interest, all costs, charges, expenses, etc. within 15 days from the date of receipt of the said notices. The Recovery Officer has thereafter attached the bank accounts, demat accounts and



mutual fund folios of Ms Sudha Mahendra Agrawal on August 24, 2023 in execution of the said notices and served copies of the attachment notices on Defaulters. Thereafter, general remittance orders have been issued on March 18, 2024 in the said RCs.

3. Since the entire dues could not be recovered from Defaulters, assets of Defaulters including immovable properties are liable to be attached. It is learnt that the defaulter is in possession of the below mentioned properties [para 4] in the state of Gujarat, it is also felt that he may dispose or transfer or alienate the assets with a view to obstruct or delay the recovery proceedings, which needs to be prevented immediately by attaching the said assets.
4. In view of the above and in exercise of the powers conferred under Section 28A of the Securities and Exchange Board of India Act, 1992 read with Rules 16, 48 and 51 of the Second Schedule to the Income-tax Act, 1961, all the properties of the defaulter including the property as shown in table below is hereby attached. Accordingly, Defaulter is hereby prohibited from disposing, transferring, alienating, or charging in respect of the following attached property:

Description of Property	Address of Property	Name of Holder/s
Residential premises	Mouje Thaltej, Taluka Ghatlodia, Dist Ahmedabad , Survey No.366 and 372/2/B Paiki, Bungalow No.5, Royal Crescent, Near Asopalav Bungalows, Thaltej, Ahmedabad, Gujarat - 380059	Ms Sudha Mahendra Agrawal

5. It is further directed that all persons are hereby prohibited from taking any benefit under such disposal, transfer, alienation or charge in respect of the properties of the defaulter including one mentioned above, which stand attached in execution of the present Recovery Certificate.
6. The Defaulter is also hereby directed to furnish the following information and documents at SEBI Bhavan, Western Regional Office, Panchvati 1st Lane, Gulbai Tekra Road, Ahmedabad - 380006, Gujarat within one week from the date of this order:
 - (i) Complete details of all movable and immovable properties held by the Defaulter either in his/her name, singly or jointly, or held in the name of any other person and charges, if any, thereon in the format prescribed at **Annexure-A**;
 - (ii) Original title deeds/ certified copies of all title deeds and valuation reports of all the properties held by the Defaulter either in his/her name, singly or jointly, or held in the name of any other person.



7. This order shall be served on the Defaulter, and –

7.1. the Inspectors General of Registration of Gujarat to not act upon any documents purporting to be dealing with transfer, mortgage, charge, lease or creation or alteration of any interest in any of the properties owned/ held by the defaulter, including the said property if presented for registration;

7.2. the concerned Sub-Registrars of the respective area where the above mentioned property is located; and

7.3. Chairman / Secretary of the Sudip Cooperative Housing Society Limited.

Given under my hand and seal at Ahmedabad this 28th Day of September, 2026.

SEAL



J. Shandilya
Recovery Officer

जैनेन्द्र शांडिल्य / JAINENDRA SHANDILYA
बसूली अधिकारी एवं उप महाप्रबन्धक
Recovery Officer & Deputy General Manager
भारतीय प्रतिभूति और विनियम बोर्ड
Securities and Exchange Board of India
पश्चिमी प्रादेशिक कार्यालय / Western Regional Office
अहमदाबाद / Ahmedabad



ANNEXURE- A to Order No. RO/1537/2026

**Details of all movable and immovable assets of Ms Sudha Mahendra Agrawal
(Defaulter)**

Sr. No.	Description of the Property	Date of Purchase and Name of Holder on behalf of the Defaulter	Purchase Price	Present Market Value	Details of building, fixtures, fittings, standing crop, timber, livestock, etc.	Details of Encumbrance, if any
1.						
2.						
3.						
4.						
5.						