



CERTIFICATE No. 8961 of 2025

Certificate under Section 23JB of the Securities Contract (Regulation) Act, 1956
read with section 222 of the Income-tax Act, 1961

PAN- BXHPA0464M

Trade Nexa Research Investment Advisor
(Prop. Minakshi Asavani)
Plot no. 352-PU4 scheme 54,
Vijay Nagar, Indore, Madhya Pradesh – 452010

**NOTICE OF DEMAND UNDER RULE 2 OF THE SECOND SCHEDULE TO THE
INCOME-TAX ACT, 1961 READ WITH SECTION 23JB OF THE SECURITIES
CONTRACT (REGULATION) ACT, 1956**

1. This is to certify that a sum of Rs.7,29,000/- (Rupees Seven Lakh Twenty Nine 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 Rs.)
Penalty levied by the Adjudicating Officer vide Order No. Order/AK/GN/2025-26/31587 dated August 12, 2025 in the matter of Trade Nexa Research Investment Advisor (Prop. Minakshi Asavani) with respect to certain non-compliance with provisions of SEBI (Investment Advisers) Regulations, 2013, SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 and circulars issued by SEBI	7,00,000
Interest from August 2025 to November 2025 @ 1% p.m.	28,000
Recovery Cost	1,000
Total	7,29,000

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. **SEBIRDPEN8961** of **ICICI Bank**, IFSC 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** 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.

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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 20.06.2025, 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, Securities and Exchange Board of India, SEBI Bhavan-II, Plot No. C – 7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400051." or sent by email to ravindrap@sebi.gov.in & recoveryho@sebi.gov.in

Case Name and Recovery Certificate Number :	
Name of Payee :	
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.

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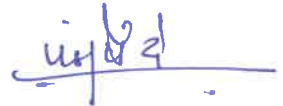
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7. In addition to the aforesaid dues, you will also be liable for further interest, all costs, charges and expenses incurred in respect of recovery proceedings against you.
8. Further, you are granted an opportunity to appear before the Recovery Officer on December 8, 2025 at 11:00 AM at SEBI Bhawan II, PN-C/7, G Block BKC, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051. Any communication/query in this regard may be made at pankajs@sebi.gov.in / ravindrap@sebi.gov.in (022-26449427).

Dated: 27.11.2025

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PANKAJ SHINDE
DEPUTY GENERAL MANAGER
AND RECOVERY OFFICER

पंकज सुवराज शिंदे
PANKAJ YUVARAJ SHINDE
उप. महाप्रबंधक और वसूली अधिकारी
Dy. General Manager & Recovery Officer
भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India
मुंबई / Mumbai

Copy to :

CDSL NSDL All Mutual Funds in India	With a request to provide the holding details of Trade Nexa Research Investment Advisor (Prop. Minakshi Asavani) (PAN-BXHPA0464M) , immediately by return e-mail and intimate to the Recovery Officer in case any sale or redemption request is received from the Defaulter after the date of this Notice of Demand
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