SECURITIES AND EXCHANGE BOARD OF INDIA
WESTERN REGIONAL OFFICE

SEBI Bhavan, Panchvati 1st Lane, Gulbai Tekra Road, Ahmedabad-380006

CERTIFICATE No.RC6379/2023

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. Sunilkumar Bhikhabhai Nayi (PAN: AIHPN8889R) A-1, Basement 6, Rajkamal Plaza, Opp Sakar 3, Near C U Shah College, Ashram Road, Ahmedabad 380013, Gujarat	श्री सुनीलकुमार भीखाभाई नई (पैन: AIHPN8889R) ए-1, बेसमेंट 6, राजकमल प्लाजा, सकर 3 के सामने, सी यू शाह कॉलेज के पास, आश्रम रोड, अहमदाबाद 380013, गुजरात

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 Thousands 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 (Rs.)**
Penalty imposed by the Adjudicating Officer vide Order No. Order/AS/GD/2022-23/22498-22510 dated December 29, 2022 in the matter of Investigation into the trading activities of certain entities in the scrip of SFL International Ltd.	5,00,000
Interest from December 2022 to April 2023 @ 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 (**DD shall be drawn in favour of the "SEBI Recovery Proceeds" Account payable at Mumbai (or) EFT/NEFT/RTGS to A/c No. SEBIRRDPEN6379 of ICICI Bank, IFSC code – ICIC0000106 (or) online payment facility available on the "Recovery Payment" module at https://siportal.sebi.gov.in or the 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

भारतीय प्रतिभूति और विनिमय बोर्ड
पश्चिमी प्रादेशिक कार्यालय
Western Regional Office
Securities and Exchange Board of India

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;
   (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 **December 2022** 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, SEBI Bhavan, Panchvati 1st Lane, Gulbai Tekra Road, Ahmedabad-380006 or sent by email to recoverywro@sebi.gov.in, rajunu@sebi.gov.in and abhishek@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.

Dated: April 05, 2023



Recovery Officer

N. U. Raju
Recovery Officer & Dy. General Manager
Securities and Exchange Board of India
Ahmedabad