भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India

SEBI Bhavan-II, Plot No.C7, G-Block, Bandra Kurla Complex, MUMBAI – 400 051

CERTIFICATE No. 8775 of 2025

Certificate under Section 28A of Securities and Exchange Board of India Act, 1992 read with section 222 of the Income-tax Act, 1961

Mandar Ulhas Bhatkar **PAN: AYYPB8605Q** Address: Room no. 1, Chawl – 4, G.D. Ambekar Road, Naigoan Dadar – East, Near Police Ground, Mumbai - 400013	**Vikrant Bhimrao Kadam** **PAN: BXXPK4344L** Address: 4/57 Spring Mill Compund, GD Ambekar Marg, Naigoan, Dadar (East), Mumbai - 400014

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. 36,32,923.72/- (Rupee Thirty-Six Lakh Thirty-Two Thousand Nine Hundred Twenty-Three and Paise Seventy-Two 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 Quasi-Judicial Authority vide order no. QJA/GR/IVD/ID6//31132/2024-25 dated 28.01.2025 in the matter of Front Running by Mandar Ulhas Bhatkar.	34,26,342.95/-
Interest from January, 2025 to June, 2025 @ 1% p.m.	2,05,580.77/-
Recovery cost	1,000.00/-
Total	**36,32,923.72/-**

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. SEBIRRDPEN8775 of ICICI BANK, IFSC code – ICIC0000106) (OR) online payment facility**

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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 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;
   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 January 28, 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 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 III, Securities and Exchange Board of India, SEBI Bhavan II, Plot No. C – 7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051" or sent by email to tanmayag@sebi.gov.in & recoveryho1@sebi.gov.in

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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: 04.06.2025

RECOVERY OFFICER

DEEPU ANANDAN
दीपू आनंदन
Dy. General Manager & Recovery Officer
उप महाप्रबंधक एवं वसूली अधिकारी
Securities and Exchange Board of India
भारतीय प्रतिभूति और विनिमय बोर्ड
Mumbai
मुंबई

[***Copy to***: Depositories and All MutualFunds in India (by e-mail) with a request to provide the holding details of **Mandar Ulhas Bhatkar [PAN: AYYPB8605Q] and Vikrant Bhimrao Kadam [PAN: BXXPK4344L]** immediately by return e-mail and intimate to the Recovery Officer in case any sale or redemption request received from the defaulter after the date of this Notice of Demand.]