



भारतीय प्रतिभूति और विनियम बोर्ड
Securities and Exchange Board of India

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

CERTIFICATE No. 8881 of 2025

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

Sr. No.	Name of the entity	Address of the entity
1	Thousand Keys, Proprietor – Tapas Das (PAN: ANKPD3883D)	1. Mr. Tapas Das S/O Hajarilal Das, 42, Bangali Colony, M.L. Nagar, Ujjain – 456010, Madhya Pradesh. 2. Thousand Keys, Proprietor – Tapas Das 111, Mani Avenue, Opposite Bank Of India, Ujjain – 456010, Madhya Pradesh.

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.77,10,353.20/- (Rupees Seventy-Seven Lakh Ten Thousand Three Hundred Fifty-Three and Twenty Paise 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.)
Refund order imposed on Thousand Keys, Proprietor – Tapas Das by the QJA vide Order No. QJA/SS/WRO/WRO-DIV-5/31119/2024-25 dated 17.01.2025 in the matter of Unregistered Investment Advisory Services.	71,38,290.00/-
Interest from January, 2025 to August, 2025 @ 1% p.m.	5,71,063.20/-
Recovery cost	1,000.00/-
Total	77,10,353.20/-

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. SEBIRNCIS8881 of Bank Of India, IFSC code – BKID00VAN04 (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.



Contd..2..

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 17, 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 akashb@sebi.gov.in & recoveryho1@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.

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: 29.08.2025

DEEPU ANANDAN
DEPUTY GENERAL MANAGER
AND 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 विनियम बोर्ड
 Mumbai
 मुंबई



Copy to :

CDSL NSDL All Mutual Funds in India	With a request to provide the holding details of Thousand Keys, Proprietor – Tapas Das (PAN: ANKPD3883D) 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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