BEFORE THE SECURITIES APPELLATE TRIBUNAL MUMBAI

Date: 24.09.2026

Appeal No. 255 of 2026
And
Misc. Application No. 837 of 2026

Rakshit Mahendra Shah ….. Appellant

Versus

Securities and Exchange Board of India … Respondent

Ms. Poonam Gadkari, Advocate for the Appellant.

Mr. Vishal Kanade, Advocate with Mr. Mihir Mody, Mr. Aavish Shetty, Mr. Vijay Chockalingam, Mr. Sudhanshuman Naruka, Mr. Vignesh Narayanan, Advocates i/b. M/s. K. Ashar & Co. for the Respondent.

ORDER :

1. Admit.

2. Respondent is allowed six weeks to file reply. Rejoinder, if any, be filed within three weeks thereafter.

3. Learned advocate for the appellant submitted that appellant is Chartered Accountant. By the impugned order, SEBI has imposed a penalty of Rs. 10 Lakhs and he has also been debarred from accessing the securities market. He submitted that appellant is prepared to deposit full penalty; and prayed for stay of the impugned order.

4. Mr. Vishal Kanade, learned advocate for the SEBI adverting to paragraph Nos. 75 and 76 of the impugned order submitted that the appellant is involved in the overall fraudulent scheme. Appellant has falsely claimed that he

had spoken to the Noticee No. 2 on telephone for guiding him with regard to the ROC matter and not with respect to alleged fraud, whereas the Company in question was already a public limited company in 2020. Therefore, appellant is actively involved in the fraudulent scheme.

5. We have carefully perused paragraph Nos. 75 and 76 of the impugned order.

6. To a pointed query, as to which act of the appellant amounts to violation of law, Mr. Kanade, submitted that he is involved in the overall scheme. In our view, paragraph Nos. 75 and 76 do not *prima facie* substantiate SEBI's contention.

7. There shall be stay of the impugned order subject to deposit of full penalty amount within four weeks from today. The same shall be kept in an interest-bearing account by SEBI. All contentions of both parties are kept open.

8. Post alongwith Appeal No. 181 of 2026 (NNM Securities Pvt. Ltd. vs. SEBI) on November 26, 2026.

Justice P. S. Dinesh Kumar
Presiding Officer

Ms. Meera Swarup
Technical Member

Dr. Dheeraj Bhatnagar
Technical Member

24.09.2026
PTM

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