



Enforcement Department I
Recovery Division II

भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

Tel: 022-26449095

Email: recoveryho@sebi.gov.in

Notice of Attachment of Bank Account

Attachment Proceeding No. 3671 of 2018
Certificate No. 1475 of 2018

The Principal Officer /
Chairman & Managing Director / CEO
All the Banks in India.

- Whereas a Recovery Certificate No.1475 of 2018 dated 31/05/2018 has been drawn up by the Recovery Officer in the above proceedings for recovery of a sum of Rs.3189384/- (Rupees Thirty One Lakhs Eighty Nine Thousand Three Hundred Eighty Four Only) as detailed given below along with further interest, all costs, charges and expenses etc. against **Manish Thakkar ["Defaulter"] PAN. ACTPT8377N** and the same is due from him in respect of the said certificate. A Notice of Demand dated 31/05/2018 has been issued to **Manish Thakkar**.

Description of Dues	Amount
Penalty imposed on Manish Thakkar (PAN No. ACTPT8377N) by the Adjudicating Officer vide order no. SM/PR/2017-18/1194 dated 21/11/2017 in the matter of Portfolio Management Activities by KE Consulting Group / Manish Thakkar.	3000000
Interest from 21/11/2017 to 31/05/2018 @ 12% p.a.	188384
Recovery cost	1000
Total	3189384

- And whereas there is sufficient reason to believe that the defaulter may dispose of the amounts/proceeds in the Bank accounts held with your Bank and realization of amount due under the certificate would in consequence be delayed or obstructed.
- It is, therefore, in exercise of powers conferred on me, I hereby order to attach the following with immediate effect to the extent of above said dues:



- All account/s by whatever name called including lockers of the Defaulter, either singly or jointly with any other person/s, held with your Bank; and
- All other amount/proceeds due or may become due to the Defaulter or any money held or may subsequently hold for or on account of the Defaulter.

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सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर.एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in

SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051.
Tel.: 2644 9950 / 4045 9950 (IVRS), 2644 9000 / 4045 9000 Fax : 2644 9019 to 2644 9022 Web : www.sebi.gov.in



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

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A.P. No.3671of 2018

4. It is further ordered with immediate effect that **No Debit** shall be made in the said account/s **to the extent of the total dues mentioned above** until further orders from the Recovery Officer of SEBI. However, the credits, if any, into the account may be allowed.
5. You are hereby directed to provide the following immediately to the undersigned on service of this Notice:
 - a) Details of all the Accounts including Lockers held by the defaulter with your Bank;
 - b) Copy of the Account Statement/s for the latest one year in respect of all the Accounts;
 - c) Confirmation of Attachment of the said account/s and lockers; and
 - d) Complete details of all loan/advances accounts along with the details of assets charged for the said loan/advances.
6. If the defaulter is not having any type of account with your bank/not having any balance in the account of the defaulter, the same shall be also informed on the email: recoveryho@sebi.gov.in.
7. This Notice of attachment is issued in exercise of powers conferred under section 28A(1), 11(2)(ia) of SEBI Act, 1992 read with section 226 and the second schedule of the Income Tax Act, 1961.

Given under my hand and seal at Mumbai this 10th day of July 2018.

SEAL

Copy to:

Manish Thakkar
(PAN:ACTPT8377N)
B/111 Kalpataru Residency, Near Sion Circle,,
Sion East,
Mumbai 400022



RECOVERY OFFICER

ATANU PAN / अतनु पान
Dy. General Manager & Recovery Officer
उप महाप्रबंधक एवं वसूली अधिकारी
Securities and Exchange Board of India
भारतीय प्रतिभूति एवं विनिमय बोर्ड
Mumbai / मुंबई

(With a direction not to receive/ recover/ demand the proceeds/ money held / to be held in the aforesaid accounts).



भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

Enforcement Department I
Recovery Division II

Tel: 022-26449095
Email: recoveryho@sebi.gov.in

Notice of Attachment of Demat Account and Mutual Fund Folio(s)

Attachment Proceeding No. 3672 of 2018
Certificate No.1475 of 2018

M/s. National Securities Depository Ltd.
4th floor, 'A', Wing, Trade World
Kamala Mills Compound
Senapati Bapat Marg
Lower Parel, Mumbai – 400 013.

M/s. Central Depository Services (I) Ltd.
P J Towers, 17th floor
Dalal Street
Fort, Mumbai – 400001

**The Principal Officer /Chairman & Managing Director / CEO
All the Mutual Funds in India.**

1. Whereas a Recovery Certificate No.1475 of 2018 dated 31/05/2018 has been drawn up by the Recovery Officer in the above proceedings for recovery of a sum of Rs.3189384/- (Rupees Thirty One Lakhs Eighty Nine Thousand Three Hundred Eighty Four Only) as detailed given below along with further interest, all costs, charges and expenses etc. against **Manish Thakkar["Defaulter"]** PAN. ACTPT8377N and the same is due from him in respect of the said certificate. A Notice of Demand dated 31/05/2018 has been issued to **Manish Thakkar**.

Description of Dues	Amount
Penalty imposed on Manish Thakkar (PAN No. ACTPT8377N) by the Adjudicating Officer vide order no. SM/PR/2017-18/1194 dated 21/11/2017 in the matter of Portfolio Management Activities by KE Consulting Group / Manish Thakkar.	3000000
Interest from 21/11/2017 to 31/05/2018 @ 12% p.a..	188384
Recovery cost	1000
Total	3189384

2. And whereas there is sufficient reason to believe that the Defaulter may dispose off the securities/instruments in the Demat account/s or Mutual fund folio/s held with you and realization of amount due under the certificate would in consequence be delayed or obstructed.

3. It is, therefore, in exercise of powers conferred on me, I hereby order to attach the following with immediate effect :

- i) All Demat Account/s by whatever name called of the Defaulter, either singly or jointly with any other person/s, held with you.

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सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर. एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in



अनुवर्ती :
Continuation :

भारतीय प्रतिभूति
और विनियम बोर्ड
Securities and Exchange
Board of India

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A.P. No.3672 of 2018

- ii) All Mutual fund folio/s by whatever name called of the Defaulter, either singly or jointly with any other person/s, held with you.
4. It is further ordered with immediate effect that **No Debit** shall be made in the said accounts/folios until further orders. However, the credits, if any, into the account may be allowed.
5. You are hereby directed to provide the following immediately to the undersigned/our representative on service of this Notice.
- a) Details of all the Accounts/folios held by the defaulter with you;
b) Copy of the Account Statement/s; and
c) Confirmation of Attachment of the said accounts/folios
6. If the defaulter is not having any type of account/folios with you/not having any balance in the account/folios of the defaulter, the same shall be also informed on the email: recoveryho@sebi.gov.in.
7. This Notice of attachment is issued in exercise of powers conferred under section 28A(1), 11(2)(ia) of SEBI Act, 1992 read with section 226 and the second schedule of the Income Tax Act, 1961

Given under my hand and seal at Mumbai this 10th day of July 2018.

SEAL



Copy to:

Manish Thakkar
(PAN:ACTPT8377N)
B/111 Kalpataru Residency, Near Sion Circle,,
Sion East,
Mumbai 400022

RECOVERY OFFICER

ATANU PAN / अतनु पान
Dy. General Manager & Recovery Officer
उप महाप्रबंधक एवं वसूली अधिकारी
Securities and Exchange Board of India
भारतीय प्रतिभूति एवं विनियम बोर्ड
Mumbai / मुंबई

(With a direction not to receive/ recover/ demand the proceeds/ money held / to be held in the aforesaid accounts).



Deputy General Manager & Recovery Officer
Recovery Division - II
Recovery and Refund Department
Tel: 022-2644 9127/ 4045 9127
Email: pankajs@sebi.gov.in

Notice of Attachment of Bank Account(s)/Lockers

Attachment Proceeding No. 14640 of 2025

Certificate No. 1475 of 2018

The Principal Officer / Head Postmaster
Chairman & Managing Director / CEO
All the Banks in India,
All the Post Offices

Whereas Recovery Certificate No. 1475 of 2028 dated May 31, 2018 was drawn up by the Recovery Officer in the above proceedings for recovery of a total sum of Rs. 31,89,384/- (Rupees Thirty One Lakh Eighty Nine Thousand Three Hundred and Eighty Four Only) as detailed below along with further interest, all costs, charges and expenses etc. against **Manish Thakkar (PAN: ACTPT8377N) ["Defaulter"]** and the same is due from the defaulter in respect of the said certificate. Notice of Demand dated May 31, 2018 was issued to the defaulter for the following dues:

Description of Dues	Amount (in Rs.)
Penalty imposed by AO vide order No. SM/PR/2017-18/1194 dated 21/11/2017 in the matter of Portfolio Management Activities by KE Conulting Grup/Manish Thakkar	30,00,000/-
Interest from 21/11/2017 to 31/05/2018 @12% p.a.	1,88,384/-
Recovery cost	1,000/-
Total	31,89,384/-

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AP No. 14640 of 2025

2. However, since no amount was paid by the defaulter and there was sufficient reason to believe that the defaulter may dispose of the amounts/proceeds in the Bank accounts held with your Bank and realization of amount due under the certificate would in consequence be delayed or obstructed, Notices of Attachment dated July 10, 2018 (AP No. 3671 of 2018) was issued *inter alia* attaching bank accounts/lockers, etc. of the Defaulter.

3. A letter has been received from Office of the Assistant Commissioner of Police, Delhi, Economic Offense Wing, Police Station Mandir Marg Complex, New Delhi ("EOW") w.r.t. the Defaulter, which *inter alia* states that "*it has been alleged that Manish Harish Thakkar/Manish Palan has changed his name and started accessing securities market in the name of Mr. Manish Palan (PAN: CFWPP1882A)*". Pursuant to aforesaid vide email dated May 09, 2025, information and documents, such as KYC, statements, etc., w.r.t. the Defaulter and Manish Palan (PAN: CFWPP1882A) was sought from all banks. Upon perusal of the documents and information received from banks, I came to the conclusion that both Defaulter and Mr. Manish Palan (PAN: CFWPP1882A), are one and same person, therefore, the accounts and lockers of Mr. Manish Palan (PAN: CFWPP1882A) are also liable to be attached.

4. Therefore, in exercise of powers conferred on me, I hereby order to attach the following with immediate effect:

- a) All account(s), by whatever name called, including lockers of the Mr. Manish Palan (PAN: CFWPP1882A), either singly or jointly with any other person(s), held with your Bank; and
- b) All other amounts/proceeds due or may become due to the Mr. Manish Palan (PAN: CFWPP1882A) or any money held or may subsequently be held for or on account of the defaulter.

5. It is further ordered with immediate effect that **No Debit** shall be made in the said account/s **to the extent of the total dues mentioned above** until further orders from the Recovery Officer of SEBI. However, the credits, if any, into the account may be allowed.

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AP No. 14640 of 2025

6. You are hereby directed to provide the following immediately to the undersigned on service of this Notice:

- a) confirmation of Attachment of the said account(s) and lockers; and
- b) complete details of all loan/advances accounts along with the details of assets charged for the said loans/advances.

If no response is received within 15 days from the date of receipt of this order, it will be presumed that Mr. Manish Palan (PAN: CFWPP1882A) is having no bank account/balance with your bank.

7. If Mr. Manish Palan (PAN: CFWPP1882A) does not have any type of account with your bank, then the same need not be informed.

8. You are also directed to immediately attach any new account/s opened by Mr. Manish Palan (PAN: CFWPP1882A) with your Bank post issuance of this notice of attachment and intimate the same to the undersigned along with the details of the new account/s.

9. This Notice of attachment is issued in exercise of powers conferred under section 28A(1), 11(2)(ia) of SEBI Act, 1992 read with section 226 and the Second Schedule to the Income-tax Act, 1961.

Given under my hand and seal at Mumbai this May 26, 2025.

SEAL



RECOVERY OFFICER

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



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AP No. 14640 of 2025

Copy to:

1. Mayank Palan/ Manish Thakkar

28 Santvan Row House, New Pal Road, Ad Ajan Nr Kakshtra Apt,
Near Nakshtra Appartment ,
Surat, Gujarat

H/1208, Safal Parishkaar, Phase 2, Khokhra Circle,
Khokhra,
Ahmedabad City, Gujarat, Pin 380008

A 3 48, Upper Ground Floor, Sector 15
Rohini, Delhi-110089

2. SI Rahul Kumar, EOW

Office of the Assistant Commissioner of Police, Delhi,
Economic Offense Wing,
Police Station Mandir Marg Complex,
New Delhi ("EOW")

(With a direction not to receive/ recover/ demand the proceeds/ money held / to be held in the aforesaid accounts).

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Deputy General Manager & Recovery Officer
Recovery Division - II
Recovery and Refund Department
Tel: 022-2644 9127/ 4045 9127
Email: pankajs@sebi.gov.in

Notice of Attachment of Demat Account(s) and Mutual Fund Folio(s)

Attachment Proceeding No. 14641 of 2025

Certificate No. 1475 of 2018

M/s. National Securities Depository Ltd.	M/s. Central Depository Services (I) Ltd.
4th floor, 'A', Wing, Trade World	P J Towers, 17th floor
Kamala Mills Compound	Dalal Street
Senapati Bapat Marg	Fort, Mumbai - 400001
Lower Parel, Mumbai - 400 013.	

The Principal Officer / Chairman & Managing Director / CEO

All the Mutual Funds in India.

Whereas Recovery Certificate No. 1475 of 2028 dated May 31, 2018 was drawn up by the Recovery Officer in the above proceedings for recovery of a total sum of Rs. 31,89,384/- (Rupees Thirty One Lakh Eighty Nine Thousand Three Hundred and Eighty Four Only) as detailed below along with further interest, all costs, charges and expenses etc. against **Manish Thakkar (PAN: ACTPT8377N) ["Defaulter"]** and the same is due from the defaulter in respect of the said certificate. Notice of Demand dated May 31, 2018 was issued to the defaulter for the following dues:

Description of Dues	Amount (in Rs.)
Penalty imposed by AO vide order No. SM/PR/2017-18/1194 dated 21/11/2017 in the matter of Portfolio Management Activities by KE Conulting Grup/Manish Thakkar	30,00,000/-
Interest from 21/11/2017 to 31/05/2018 @12% p.a.	1,88,384/-
Recovery cost	1,000/-
Total	31,89,384/-

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AP No. 14641 of 2025

2. However, since no amount was paid by the Defaulter and there was sufficient reason to believe that the Defaulter may dispose of the amounts/proceeds in the Bank accounts held with your Bank and realization of amount due under the certificate would in consequence be delayed or obstructed, Notices of Attachment dated July 10, 2018 (AP No. 3672 of 2018) was issued *inter alia* attaching bank accounts/lockers, etc. of the Defaulter.

3. A letter has been received from Office of the Assistant Commissioner of Police, Delhi, Economic Offense Wing, Police Station Mandir Marg Complex, New Delhi ("EOW") w.r.t. the Defaulter, which *inter alia* states that "*it has been alleged that Manish Harish Thakkar/Manish Palan has changed his name and started accessing securities market in the name of Mr. Mayank Palan (PAN: CFWPP1882A)*". Pursuant to aforesaid vide email dated May 09, 2025, information and documents, such as KYC, statements, etc., w.r.t. the Defaulter and Manish Palan (PAN: CFWPP1882A) was sought from all banks. Upon perusal of the documents and information received from banks, I came to the conclusion that both Defaulter and Mr. Manish Palan (PAN: CFWPP1882A), are one and same person, therefore, the accounts and lockers of Mr. Manish Palan (PAN: CFWPP1882A) are also liable to be attached.

4. Therefore, in exercise of powers conferred on me, I hereby order to attach the following with immediate effect:

- a) All Demat Account(s), by whatever name called, of the Mr. Manish Palan (PAN: CFWPP1882A), either singly or jointly with any person(s), held with you.
- b) All Mutual Fund Folios by whatever name called of the Mr. Manish Palan (PAN: CFWPP1882A), either singly or jointly with any person/s, held with you.

5. It is further ordered with immediate effect that **No Debit** shall be made in the said account/s to the extent of the total dues mentioned above, until further orders from the recovery officer of SEBI. However, the credits, if any, into the account may be allowed.

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AP No. 14641 of 2025

6. You are hereby directed to provide the following immediately to the undersigned/our representative on service of this Notice:

- a) Details of all the Accounts/folios held by the Mr. Manish Palan (PAN: CFWPP1882A) with you;
- b) copy of the Account Statement(s); and
- c) confirmation of Attachment of the said account(s)/folios.

If no response is received within 15 days from the date of receipt of this order, it will be presumed that the defaulter is having no account/folio with you.

7. If the defaulter does not have any type of account/folios with you, then the same need not be informed to SEBI.

8. You are also directed to immediately attach any new account/s opened or folio/s created for the defaulter by you post issuance of this notice of attachment and intimate the same to the undersigned along with the details of the new account/s or folio/s.

9. This Notice of Attachment is issued in exercise of powers conferred under section 28A(1), 11(2)(ia) of SEBI Act, 1992 read with section 226 and the Second Schedule to the Income-tax Act, 1961.

Given under my hand and seal at Mumbai on May 26, 2025.

SEAL

RECOVERY OFFICER

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



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AP No. 14641 of 2025

Copy to:

3. Mayank Palan/ Manish Thakkar

28 Santvan Row House, New Pal Road, Ad Ajan Nr Kakshtra Apt,
Near Nakshtra Appartment ,
Surat, Gujarat

H/1208, Safal Parishkaar, Phase 2, Khokhra Circle,
Khokhra,
Ahmedabad City, Gujarat, Pin 380008

A 3 48, Upper Ground Floor, Sector 15
Rohini, Delhi-110089

4. SI Rahul Kumar, EOW

Office of the Assistant Commissioner of Police, Delhi,
Economic Offense Wing,
Police Station Mandir Marg Complex,
New Delhi ("EOW")

(With a direction not to receive/ recover/ demand the proceeds/ money held / to be held in the aforesaid accounts).