

**IN THE SECURITIES APPELLATE TRIBUNAL
AT MUMBAI**

DATED THIS THE 04TH DAY OF SEPTEMBER, 2026

**Misc. Application No.694 of 2026
In
Appeal No.238 of 2026**

Vidhi Mehul Shah

.....Appellant

(By Neville Lashkari, Advocate with Ms. Kalpana Desai, Dr. Keyur Shah and Mr. Meit Shah, Advocates i/b. Prakash Shah and Associates for the Appellant.)

Securities and Exchange Board of IndiaRespondent

(By Ms. Nidhi Singh, Advocate with Ms. Komal Shah, Ms. Nidhi Faganiya and Mr. Owais Khan, Advocates i/b. Vidhii Partners for the Respondent.)

**With
Misc. Application No.697 of 2026
In
Appeal No.239 of 2026**

Mehul Hasmukh Shah

.....Appellant

(By Neville Lashkari, Advocate with Ms. Kalpana Desai, Dr. Keyur Shah and Mr. Meit Shah, Advocates i/b. Prakash Shah and Associates for the Appellant.)

Securities and Exchange Board of IndiaRespondent

(By Mr. Chetan Kapadia, Senior Advocate with Ms. Nidhi Singh, Ms. Komal Shah, Ms. Nidhi Faganiya and Mr. Owais Khan, Advocates i/b. Vidhii Partners for the Respondent.)

ORDER ON INTERIM RELIEF

Per: Justice P.S. Dinesh Kumar, Presiding Officer

These two appeals¹ are filed by Mehul Hasmukh Shah ('Mehul' for short) and his wife, Vidhi Mehul Shah ('Vidhi' for short) directed against order dated 30.06.2026 passed by the WTM², SEBI³. By the impugned order, Mehul has been directed to disgorge ₹3,81,812/- with 12% interest. Both Mehul and his wife Vidhi have been imposed with a penalty of ₹5 Lakhs each and debarment of four years.

2. We have heard Mr. Neville Lashkari, learned Advocate for the appellants and Mr. Chetan Kapadia, learned Senior Advocate for the respondent in Appeal No.239 of 2025 and Ms. Nidhi Singh, learned Advocate for the respondent in Appeal No.238 of 2025.

¹ Appeal No.238 of 2026–Vidhi Mehul Shah, Appeal No.239 of 2026–Mehul Hasmukh Shah.

² Whole Time Member

³ Securities and Exchange Board of India

3. Mr. Neville Lashkari, learned Advocate for the appellants submitted that in the case of Malay Bhow's⁴ appeal arising out of the same impugned order, this Tribunal has directed stay of the impugned order subject to deposit of 50% penalty.

4. He submitted that Mehul was working as the General Manager and Vidhi as Deputy General Manager with Mansukh Securities and Finance Limited ('Mansukh Securities' for short). After SEBI passing the impugned order, they have been asked not to report for duty. On the last date of hearing, based on an objection raised by the learned Senior Advocate for SEBI that there is no material on record to show that the impugned order has affected appellants' livelihood, we had directed the appellants to place such material on record. Appellants have filed separate affidavits with copies of documents. Mr. Lashkari submitted that the 'TDS TRACES' annexed to the affidavit clearly show that the appellants are employees with Mansukh Securities. He also adverted to a letter dated 03.08.2026 written by Mansukh Securities confirming that the said Company had orally directed the appellants not to attend the office with immediate effect.

5. Opposing stay of impugned order, Mr. Kapadia, learned Senior Advocate for SEBI submitted that the income tax documents show that they are not employees. He submitted that TRACES (Exhibit-1) shows that Mehul has received ₹1.40 Crore

⁴ Appeal No. 249 of 2026, interim order dated 03.08.2026

per year for the period between 01.04.2023 and 31.03.2024, whereas the salary certificate (Exhibit-2A and 2B⁵) shows that his basic pay is ₹75,000 and total emolument is ₹1.5 Lakhs. With regard to the interim order in Malay Bhow, he submitted that this Tribunal has passed that order based on a finding that Malay Bhow had not traded in the scrips.

6. Mr. Neville, in rejoinder submitted that the income includes bonus based on the trades but the salary is consistent.

7. We have carefully considered rival contentions and perused the records.

8. Admitted position is, Mehul has purchased 1,95,590 of DRCL⁶ shares and sold 1,02,864 shares. Table 59 in interim order cum SCN⁷ dated 19.06.2023 (Exhibit-B⁸) shows that the percentage of sell volume contribution by Mehul is 0.93% and percentage contribution of price rise is in the negative (-29.77%). In the case of Vidhi, the percentage of sell volume contribution is 0.00% and percentage contribution of price rise is in the negative (-28%).

9. This is one of the batch matters. The transactions are of the year 2018-19. Based on the income tax records and the letters written by Mansukh Securities, we are of the *prima facie*

⁵ Annexed to affidavit for submission of additional documents

⁶ Darjeeling Ropeway Company Limited

⁷ Show Cause Notice

⁸ Annexed to Volume -2 of the memorandum of appeal

view that debarment affects appellants' livelihood. However, it is relevant to note that the appellants have traded in contradistinction to the case of Malay Bhow.

10. The interim order in Malay Bhow's case is based on a finding recorded by us that Malay Bhow had not traded. We make it clear that this order is passed on the facts of these cases. Since impugned order has been fully stayed subject to conditions stipulated, we grant liberty to the SEBI to move for expeditious/out of turn hearing once the pleadings are complete.

11. In the circumstances, the impugned order shall remain stayed, subject to deposit of full disgorgement amount and penalty by Mehul and full penalty by Vidhi within four weeks from today and the amount shall be kept in an interest bearing account by the SEBI. Accordingly, Misc. application No.694 of 2026 in Appeal No.238 of 2026 and Misc. application No.697 of 2026 in Appeal No.239 of 2026 stand disposed of.

Justice P.S. Dinesh Kumar
Presiding Officer

Ms. Meera Swarup
Technical Member

Dr. Dheeraj Bhatnagar
Technical Member

04.09.2026
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