

**BEFORE THE SECURITIES APPELLATE TRIBUNAL  
MUMBAI**

**Date : 18.12.2025**

**Appeal No. 542 of 2025**  
**[Along with Misc. Application No. 1349 of 2025]**

Sandeep Ghate ...Appellant

Versus

Securities and Exchange Board of India ...Respondent

Mr. Pesi Modi, Senior Advocate with Mr. Neville Lashkari, Mr. Joby Mathew, Mr. Aditya Joby and Ms. Sanskrity Purohit, Advocates i/b Joby Mathew & Associates for the Appellant.

Mr. Chetan Kapadia, Senior Advocate with Mr. Suraj Chaudhary, Mr. Ravishekhar Pandey and Mr. Rushikesh Dusane, Advocates i/b Agama Law Associates for the Respondent.

**AND**  
**Appeal No. 543 of 2025**  
**[Along with Misc. Application No. 1350 of 2025]**

Instafin Financial Advisors LLP ...Appellant

Versus

Securities and Exchange Board of India ...Respondent

Mr. Joby Mathew with Mr. Aditya Joby and Ms. Sanskrity Purohit, Advocates i/b Joby Mathew & Associates for the Appellant.

Mr. Chetan Kapadia, Senior Advocate with Mr. Suraj Chaudhary, Mr. Ravishekhar Pandey and Mr. Rushikesh Dusane, Advocates i/b Agama Law Associates for the Respondent.

**ORDER:**

Admit.

2. The application for exemption is allowed. Misc. Application No. 1349 of 2025 is disposed of.

3. Respondent is granted six weeks time to file a reply and three weeks thereafter to the appellant to file rejoinder.

4. Shri P.N. Modi, learned Senior Advocate for the appellant submitted that appellants are Noticee Nos. 4 and 5. Noticee No. 4 is the firm and Noticee No. 5 is its partner. They are in the business of identifying angel investors for start-ups. He argued that there is no finding in the impugned order so far as violation of PFUTP Regulations qua the Noticees. He volunteered to deposit 50% of the penalty amount and prayed that the order may be stayed qua the appellant because it will affect their livelihood.

5. Shri Chetan Kapadia, learned Senior Advocate for the respondent submitted that the appellant- Noticee No. 5 has introduced angel investors and his daughter has invested in the Company. Subsequently, his daughter and others who had initially invested sold their shares after the IPO. Thus, Noticee Nos. 4 and 5 are involved in the violations of PFUTP Regulations. So far as the finding in the order is concerned Shri Kapadia adverted to paragraph 105 of the impugned order. In the said paragraph, the learned Quasi-Judicial Authority has stated that noticees had admitted to have aided and supported the Noticee No. 2 in the pre-IPO placement even though the investigating report is completely silent whether the shares were sold by appellant's daughter for benefit of Noticee No. 2 and what was the purpose of transfer.

Having recorded such a finding, he has noted that Noticees had actively aided and abetted in the activities of Noticee Nos. 1, 2 and 3.

6. In the circumstances, in our opinion, on the strength of above finding, appellants cannot be refrained from continuing with their business which affects their livelihood which violates Article 21 of the Constitution of India.

7. Hence, subject to deposit of 50% of penalty within four weeks from today, the operation of impugned order shall remain stayed qua the appellants. The said amount shall be kept in an interest bearing account with lien marked to the SEBI.

8. Call on 18.03.2026.

Justice P.S. Dinesh Kumar  
Presiding Officer

Dr. Dheeraj Bhatnagar  
Technical Member

18.12.2025  
msb