

BEFORE THE APPELLATE AUTHORITY
(Under the Right to Information Act, 2005)
SECURITIES AND EXCHANGE BOARD OF INDIA

Appeal No. 6539 of 2025

Atyam Prabhu : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated July 19, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated August 12, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00230) dated August 28, 2025. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.
2. **Queries in the application** - The appellant, in his application dated July 19, 2025, sought the following information:

“ I am filing this RTI application under the Right to Information Act, 2005. I kindly request you to provide information as detailed below:

PART 1 : Companies that Issued Partly Paid Equity Shares (under Companies Act, 1956) . Please provide a list of companies that issued partly paid equity shares through public issue under the Companies Act, 1956.

For each company, provide the following details:

- 1. Name of the company*
- 2. Year of the issue*
- 3. Number of partly paid equity shares issued*
- 4. Face value per share*
- 5. Issue Price per Share*

6. *Amount Paid per share*

7. *Whether the shares were:*

a) *Converted to fully paid shares*

b) *Forfeited due to non-payment of calls, forfeiture year*

PART 2 : Adjustment or Refund of Excess Application Money

In cases investors applied for multiple partly paid shares but were allotted fewer than applied:

1. *Was the excess application money (pertaining to non allotted partly paid shares) adjusted towards: Conversion of a partly paid share certificate into a fully paid share certificate? when the amount is sufficient to do so?*

2. *In cases where such adjustment was not done, was the excess money refunded?*

3. *Please provide:*

Names of companies where such adjustments or refunds occurred.

The year of occurrence.

Any relevant guidelines, circulars, or clauses in the Companies Act, 1956 or SEBI regulations that governed such adjustments.

The requested information is not readily or fully available in the public domain or on the websites of SEBI or MCA, nor in the disclosures under Section 4(1) (b) of the RTI Act. Hence, I am invoking my right under Sections 2(f), 2(j), and 6(1) of the RTI Act, 2005 to request this information directly from your office.”

3. **Reply of the Respondent** –The respondent, in response to queries in the application, informed that the queries are vague and not specific. Accordingly , the same cannot be construed as “information”, as defined u/s 2(f) of the RTI Act.
4. **Ground of appeal** – The appellant has filed the appeal on the ground that he was refused access to the information requested.
5. I have perused the application and the response provided thereto. On consideration, I concur with the response of the respondent that the appellant’s queries are vague, broad and not specific. It is an established law that the information sought for in order to be disclosable under the RTI Act, must be clear, specific and available in the records of the public authority. In this context, I note that in the matter of Mr.

T. V. Sundaresan vs. CPIO, Securities and Exchange Board of India (Decision dated November 24, 2021), the Hon'ble Central Information Commission held: "*The framework of the RTI Act, 2005 expects that the information sought is specific and believed to be existing with the public authority in documented or material form as such; which can be shared with the appellant as per the provisions of the RTI Act. Answering to broad, multiple and general queries and presumptive documents that should have been generated as per the expectation of the appellant cannot be furnished under the provisions of the Act.*" Accordingly, I do not find any deficiency in the response of the respondent.

6. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The appeal is accordingly dismissed.

Place: Mumbai

Date: September 23, 2025

RUCHI CHOJER

**APPELLATE AUTHORITY UNDER THE RTI ACT
SECURITIES AND EXCHANGE BOARD OF INDIA**