

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

Appeal No. 5090 of 2022

Anupamaa Kaalra	:	Appellant
	Vs	
CPIO, SEBI, Mumbai	:	Respondent

ORDER

1. The appellant had filed an application dated March 24, 2022 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated April 18, 2022, responded to the application filed by the appellant. The appellant filed an appeal dated April 24, 2022, with respect to which an order dated May 19, 2022 (in Appeal No. 5008 of 2022) was passed by this forum, directing the respondent to reconsider certain queries, as requested by the appellant in her appeal. Thereafter, the respondent issued a letter dated May 27, 2022. The appellant has now filed an appeal dated June 05, 2022 for non-compliance of the said order dated May 19, 2022. 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. I note that the appellant, vide 17 queries in her application dated March 24, 2022, had sought information pertaining to transfer of shares and change of directorship in a Private Limited Company registered with MCA. The appellant, vide query number 17, had sought certain clarification from SEBI with respect to transmission of Securities. The respondent, in response to query number 17, informed that the query is in the nature of seeking clarification/opinion and accordingly, the same cannot be construed as seeking “information” under Section 2(f) of the RTI Act. However, the respondent advised the appellant to refer to Regulation 40 read with Clause C of Schedule VII of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015. The respondent also provided the link for accessing the said regulations.
3. The appellant, in her appeal dated April 24, 2022, *inter alia*, had submitted that out of the 17 queries, the respondent had only provided information with respect to one question i.e. query number 17. Further, the appellant also stated that she required the information with respect to query numbers 1, 2, 4, 6, 9, 10,

11 and 13. I note that this forum, in the order dated May 19, 2022, observed that there was no deficiency in the response provided by the respondent with respect to query number 17. However, the application dated March 24, 2022 was remitted to the respondent for reconsideration of query numbers 1, 2, 4, 6, 9, 10, 11 and 13 and for sending appropriate response in terms of the RTI Act.

4. Thereafter, the respondent, vide letter dated May 27, 2022, informed that the RTI application was partially transferred from RoC, Delhi and Haryana to SEBI for providing reply to query at para (17) only and that the same was duly replied by the respondent vide letter dated April 18, 2022. The respondent also provided copy of the transferred application for reference.
5. I have perused the information available on record and I find that the extant application was transferred by the Registrar of Companies, Delhi and Haryana on March 24, 2022 with the remarks "*The RTI application is being partially transferred for (para 17) to your office u/s 6(3) of RTI Act, 2005 as matter pertains to your office.*" Further, the respondent, in his response dated April 18, 2022, had adequately addressed the said query.
6. In view of the above observations, I am of the opinion that the respondent had sent an appropriate response to the appellant in compliance with the order dated May 19, 2022. I, therefore, find that nothing survives in the appeal and the same has become infructuous.
7. The Appeal is accordingly disposed of.

Place: Mumbai
Date: July 01, 2022

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