

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

Appeal No. 6629 of 2025

Dinesh Kumar Maheshwari : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application under the Right to Information Act, 2005 (“**RTI Act**”), which was transferred to the respondent from Department of Administrative Reforms & Public Grievances (**DARPG**) on September 26, 2025. The respondent, by a letter dated October 15, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/000303) dated November 23, 2025.
2. I note that under Section 19(1) of the RTI Act, an aggrieved person may prefer the first appeal within thirty days from the receipt of the response from the CPIO of the concerned public authority. In the instant case, the impugned response from the respondent is dated October 15, 2025. The appellant, therefore, should have filed the first appeal on or before expiry of thirty days from the date of receipt of the said response. As noted above, the appellant’s first appeal was received on November 23, 2025. The first appeal has been made after the last date permissible under the RTI Act. The appellant neither made a request for condoning the said delay in filing the appeal nor made any submission explaining the reasons which caused the delay. Considering the absence of a request for condoning the delay and any valid reason that prevented the appellant from filing the appeal in time, I consider this appeal as time barred and hence, liable to be dismissed on that count.
3. Notwithstanding the above observation, I am considering the appeal on merit. I have perused the application and the appeal and find that the matter can be decided based on the material available on record.
4. **Queries in the application** - The appellant, in his application, sought the following information:

“ 1. Complaint forwarded from Prime Minister’s Office :

I had lodged a complaint to Prime Minister’s Office vide registration no. PMOPG/E/2017/0350224 dated 24/06/2017, which was redirected to SEBI for action.

Please provide details of action taken by SEBI on my grievance against IPCA Laboratories Ltd. and Link Intime India Pvt. Ltd.

2. Complaint registered on SCORES:

My complaint was registered as SEBIE/RJ20/0001266/1 regarding MUFG Intime India Ltd. MUFG Intime, vide advice dated 02/09/2020, instructed me to submit supporting documents. I sent these via Registered Post on 09/09/2020 to Mumbai. MUFG acknowledged receipt on 17/09/2020 and assured that the documents had been forwarded to IPCA Laboratories Ltd. for verification, and once found in order, the 6 shares would be credited to my Demat account.

a) What action has been taken by IPCA Laboratories Ltd. and MUFG Intime Pvt. Ltd. on this matter?

b) Whether they fulfilled the commitments as assured? Kindly provide full details.

3. Information provided by MUFG Intime after ~20 years:

I have received an email from MUFG Intime Pvt. Ltd. after a long delay (nearly 20 years), providing certain details based on old records, though dates were not traceable. Kindly clarify:

a) On what basis/records has this information been provided?

b) Whether such information is valid and in compliance with SEBI guidelines/statutory rules?

c) If a matter remains pending against a Company or RTA for long duration under SEBI grievance mechanisms (SCORES / SMART ODR / CADRE etc.), does any limitation period apply, considering SEBI’s quasi-judicial authority?

4. Complaints involving fraud against listed companies/RTA:

In case a complaint reveals fraudulent activity by a listed company or its RTA, does SEBI investigate such matters? If yes, please provide:

a) Procedure followed by SEBI for such investigations.

b) Concerned SEBI department and its contact details including email ID.

5. Old complaint against Tonira Company (2000–2010):

I had lodged a complaint against Tonira Company during the years 2000 to 2010, in my name Dinesh Maheshwari, resident of Bhinder, District Udaipur, Rajasthan – 313603. Please confirm whether such complaint is available in SEBI’s complaint register / database and provide details thereof”

5. **Reply of the Respondent** –The respondent, in response to query no. 1 in the application, informed that the information of status/ Action Taken Report (**ATR**) with regards to CPGRAMS can be accessed by the applicant after logging into CPGRAMS website.

The respondent, in response to query no. 2a, informed that the complaint status and ATR is available on SCORES website and the same can be accessed by logging in with his login credentials.

The respondent, in response to query nos. 2b, 3 (a-c) and 5, informed that the queries are in the nature of seeking clarification. Accordingly, the same cannot be construed as "information", as defined u/s 2(f) of the RTI Act. Further, with respect to query no. 3 (c), the respondent informed that the information on limitation period is provided in paragraph 14 of the Master Circular on Online Dispute Resolution (ODR). The respondent also provided the link for accessing the said Circular.

The respondent, in response to query no. 4, informed that the query is hypothetical in nature and in the nature of seeking clarification/ opinion. However, respondent also informed that grievance(s) with respect to processing of requests by listed company/RTA may be lodged on SCORES website. Further, respondent informed SEBI may conduct examination and investigations based on the references (including complaints received from SCORES) and alerts received by it. However, pursuant to investigation, if any regulatory action is taken by SEBI, the same would be available in the public domain, on the SEBI website.

6. **Ground of appeal** – On perusal of the appeal, it appears that the appellant is not satisfied with the response of the respondent.
7. I have perused the application and the response provided thereto. With regard to query nos. 1 and 2(a), I note that the respondent has informed the appellant that the requested information can be accessed by logging into CPGRAMS and SCORES portal, respectively. Therefore, I find that the respondent has adequately addressed the queries by providing the information available with him. Accordingly, I do not find any deficiency in the response of the respondent.
8. Further, with regard to query nos. 2(b), 3(a), (b), (c), 4 and 5, I concur with the response of the respondent that the queries are in the nature of seeking clarification from the respondent. I find that the said queries cannot be construed as seeking 'information' as defined under section 2(f) of the RTI Act. Consequently, the respondent did not have an obligation to provide such clarification under the RTI Act. In this context, reliance is placed on matter of *Azad Singh vs. CPIO, Oriental Insurance Company Limited* (order dated March 23, 2021) wherein Hon'ble Central Information Commission(**CIC**) observed that "7. *The Commission, after*

hearing the submissions of both the parties and after perusal of records, observed that some queries of the appellant are in the nature of seeking explanation/ opinion/ advice/ confirmation/ clarification from the CPIO and he has expected that the CPIO firstly should analyze the documents and then provide information to the appellant. But the CPIO is not supposed to create information; or to interpret information; or to compile information as per the desire of the appellant under the ambit of the RTI Act. As per Section 2(f) of the RTI Act, the reasons/ opinions/ advices can only be provided to the applicants if it is available on record of the public authority. The CPIO cannot create information in the manner as sought by the appellant. The CPIO is only a communicator of information based on the records held in the office and hence, he cannot be expected to do research work to deduce anything from the material therein and then supply it to him.” Accordingly, I do not find any deficiency in the response of the respondent.

9. I also concur with the response of the respondent that the query no. 4 is in the nature of hypothetical query. I find that the said query cannot be construed as seeking ‘information’ as defined under section 2(f) of the RTI Act. In this context, I note that the Hon’ble CIC, in the matter of *V R Srinivasan vs. CPIO, SEBI* (Order dated January 19, 2023), held that, “*The Commission opined that the appellant has not sought any material information as defined in section 2(f) of the RTI Act, 2005 and his queries were totally based upon a hypothetical situation, therefore, the denial of information was proper.*” Accordingly, I do not find any deficiency in the response of the respondent. Notwithstanding the aforesaid, I find that the respondent has provided appropriate guidance to the appellant.
10. Additionally, I also find that query no. 5 is vague 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 CIC 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.*”.

11. 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: December 19, 2025

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