

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

Appeal No. 6871 of 2026

Sarju Devi

:

Appellant

Vs

CPIO, SEBI, Mumbai

:

Respondent

ORDER

1. The appellant had filed an application dated April 12, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated May 07, 2026, responded to the application filed by the appellant. The appellant filed an appeal dated May 07, 2026 (Reg. No. SEBIH/A/E/26/00169). I have perused the application, the response of the respondent 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 her application dated April 12, 2026, sought the following information:

“With reference to complaint number SEBIE/UP26/JHAN/007121/1, the applicant seeks information that is not available on the SCORES portal.

1. Please provide certified copies of internal file notings, processing sheets, and officer remarks recorded during the examination of the complaint, including any internal notes, digital logs, or system records not visible to the complainant on the SCORES portal.

2. Please provide records of any independent verification, examination, or analysis carried out by SEBI officials in relation to the complaint, beyond the responses available on the SCORES portal.

3. Please provide records indicating whether SEBI examined any evidence referenced by the complainant (including recorded calls). If yes, provide documents or notes reflecting such examination.

- 4. Please provide records indicating whether SEBI sought any clarification or additional information from the complainant apart from what is visible on the SCORES portal. If yes, provide copies of such communication.*
- 5. Please provide the internal reasoning, analysis, or justification recorded by SEBI officials while accepting the responses submitted by NSE and the Trading Member, including any notes or observations relating to compensation, settlement discussions, or any financial calculation forming part of the record.*
- 6. Please provide records indicating whether SEBI conducted any independent verification of the alleged data inconsistency (including face value discrepancy) or relied solely on responses submitted by NSE and/or the Trading Member.*
- 7. Please provide copies of any internal guidelines, SOPs, or criteria used by SEBI while evaluating complaints involving incorrect or inconsistent data displayed by Stock Exchanges.*
- 8. Please provide the name, designation, and role of the officers who examined and approved the disposal of the complaint.*
- 9. If no separate internal record exists apart from what is available on the SCORES portal, kindly provide a written confirmation stating that no independent file noting, verification, or internal examination record was created during the disposal of the complaint.*
- 10. Please provide copies of any circulars, guidelines, or regulatory provisions specifying the mechanism available to investors for dispute resolution in cases where the grievance pertains to exchange-level data discrepancies, and whether such matters fall within the scope of the ODR framework”*

3. **Reply of the Respondent** – The respondent, in response to query nos. 1 to 6 in the application, informed that all records and officer remarks pertaining to the SCORES complaint SEBI/E/UP26/JHAN/007121/1 are available on SCORES portal and the same can be accessed by logging into SCORES website. The respondent also informed that the same was also provided along with documents related to other complaint SEBI/E/UP25/JHAN/049497/1 on the same subject matter.

The respondent, in response to query nos.7 and 10 in the application, informed that there are no separate SOPs for each category of complaints. Notwithstanding the aforesaid, the respondent informed that as per FAQ 26, specified on SCORES website, in case a complaint(s) is not satisfied with the disposal of their complaint through SCORES website, he or she can approach Online Dispute Resolution (ODR) mechanism, consumer courts or other appropriate civil remedies as they deem fit. Further, respondent also informed the appellant regarding the provisions of SEBI Master Circular for Online Resolution of Disputes in the Indian Securities Market.

The respondent, in response to query no. 8 in the application, informed that all details related to the officer dealing with SCORES complaint SEBI/E/UP26/JHAN/007121/1 is available on SCORES portal and the same can be accessed by logging into SCORES website.

The respondent, in response to query no.9 in the application, informed that the query is in the nature of seeking clarification/confirmation. Accordingly, the same cannot be construed as “information” as defined u/s 2(f) of the RTI Act. Nevertheless, the respondent informed that the outcome of the complaint and the reasons for the disposal by the primary forum (the exchange) are already transparently available on the SCORES portal.

4. **Ground of appeal** – The appellant has filed the appeal on the ground that she was provided incomplete, misleading or false information.
5. I have perused the application and the response provided thereto. With regard to query nos. 1, 2, 3, 4, 5, 6 and 8, I find that the requested information can be accessed by the appellant from the SCORES portal. Accordingly, I do not find any deficiency in the response of the respondent.
6. With regard to query nos. 7 and 10, I find that the respondent has adequately addressed the queries by providing the information available with him.
7. With regard to query no. 9, I concur with the response of the respondent that the requested information is in the nature of seeking clarification/confirmation from the respondent. I find that the said query 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 or confirmation 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.

8. 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: June 04, 2026

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