

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

Appeal No. 6634 of 2025

Nareshkumar Ramniklal Doshi	:	Appellant
	Vs	
CPIO, SEBI, Mumbai	:	Respondent

ORDER

1. The appellant had filed an application dated September 21, 2025 (received by SEBI on September 26, 2025) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated October 23, 2025, responded to the application filed by the appellant. The appellant filed an appeal dated November 22, 2025 (received by the Office of Appellate Authority on November 25, 2025). 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, vide his application dated October 27, 2025, sought the following information regarding recovery proceedings initiated against him:

“1. Will you take the necessary steps to identify the actual defaulter?”

2. Will you get the information from group of promoters regarding the defaulter N R Doshi?

3. Will you file a police complaint (FIR) to find the defaulter NR Doshi? As he has cheated with BSE & SEBI by using incorrect PAN and hiding his actual identity and hiding himself by giving incorrect postal address which resulted in initiating the recovery process on different person than actual defaulter.

4. On my this presentation, will you free up my seized bank account with immediate effect?

5. Will you relieve the amount if any recovered from my account by you? And if so then within what time?

6. Don't you agree that such incidents of frauds are happening in our country? Yes/No?

7. Are you not supposed to consider my case when specifically brought to your notice?

8. Will you get the following information from Safal Herbs Ltd. so that the actual fraudulent person N R Doshi who is also a director in the company can be identified?

i. All papers he must have submitted to the company as a director while applying for the private allotment of shares

ii. Ask all directors of the company about his present whereabouts

iii. Inform all directors about his this mischief of misuse of PAN Card

9. Will you ask the Registrar of the company to find the details of the fraudulent Director?

10. Is there any more paper than PAN Card for verification, specifically when PAN Card is misused and misleading?

11. Can you reach the fraudulent person by using all government machineries?

12. Can you get the information of the fraudulent person from the Safal Herbs Ltd., about his Bank Details, Demat Account Details as he is allotted director quota shares by the company?

13. Will you get various identification papers like

- i. Aadhaar Card
- ii. Voter ID Card
- iii. Electricity Bill of Residence and Office
- iv. Income Tax Return
- v. Mobile Number
- vi. Email ID
- vii. Director Identification Number (DIN)
- viii. Bank Details
- ix. Demat Account Details

Etc. and other papers through Safal Herbs Ltd. and other concerned government agencies like BSE/NSE/CDSL/NSDL, IT Department, etc. to catch the fraudulent person?

14. Will you let me know the actions taken by you as per your records for the case including correspondence with all?"

3. **Reply of the Respondent** - The respondent, in response to the application, informed that the information sought is in the nature of seeking clarification/opinion. Accordingly, the same cannot be construed as "Information", as defined u/s 2(f) of the RTI Act.
4. **Ground of appeal** – On perusal of the appeal, it appears that the appellant is not satisfied with the response of the respondent.
5. I have perused the application and the response provided thereto. On consideration, I find that the queries in the application are in the nature of seeking clarification/opinion 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 or opinion 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.

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

RUCHI CHOJER

Date: December 12, 2025

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