

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

Appeal No. 7055 of 2026

Sanamdeep Singh Bakshi : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated August 11, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated August 21, 2026, responded to the application filed by the appellant. The appellant filed an appeal dated August 21, 2026 (Reg. No. SEBIH/A/E/26/00320). 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. The appellant has filed appeal only with respect to the response of the respondent to query nos. 8 to 12 in the application.
3. **Query nos. 8 to 12 in the application** - The appellant, vide query nos. 8 to 12 in his application, sought the following information:
 8. *“Please provide information and records available with SEBI regarding GT Jewellers A Unit of GreenTouch Projects Ltd and the Swarna Sangraha Yojana.*
 9. *Please provide copies of any SEBI orders directions notices investigation reports recovery proceedings or refund proceedings concerning GT Jewellers or the Swarna Sangraha Yojana.*
 10. *Please confirm whether the Swarna Sangraha Yojana was covered by or included in any SEBI proceedings against GreenTouch Projects Ltd. If yes please provide copies of the relevant records.*
 11. *Please provide the name and designation of the authority or department presently handling any complaint recovery or refund matter relating to the Swarna Sangraha Yojana.*

12. *If the matter is outside SEBI jurisdiction please provide the available information identifying the appropriate authority to which such investor grievance should be addressed.”*

4. **Reply of the Respondent** – With regard to query nos. 8, 9, 11 & 12, the respondent informed that Recovery Cell – ERO has not received any recovery proposal with respect to GT Jewellers/ Swarna Sangraha Yojana.

With regard query 10, the respondent informed that the information sought 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.

5. **Ground of appeal** – The appellant has filed the appeal on the ground that he was provided incomplete, misleading or false information.

6. I have perused the application and the response provided thereto. With regard to query nos.8, 9, 11 and 12, I note that respondent has informed that no recovery proposal was received with respect to GT Jewellers/ Swarna Sangraha Yojana by the Recovery Cell, Eastern Regional Office of SEBI. On consideration, I find that the respondent has adequately addressed query nos. 8, 11 and 12. With regard to query no. 9, I note that reply of the respondent is silent with respect to “*SEBI Orders, directions, notices, investigation reports.... concerning GT Jewellers or the Swarna Sangraha Yojana*” sought vide the said query. Accordingly, I find that the query no. 9 has not been adequately addressed and warrants reconsideration.

7. With regard to query no. 10, I find that the appellant’s query 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 opinion 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 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. Considering the above observations, I remit the application to the respondent for *de novo* consideration of first part of query no. 9 (*SEBI Orders, directions, notices, investigation reports concerning GT Jewellers or the Swarna Sangraha Yojana*) and sending appropriate response to the appellant in terms of RTI Act, within 15 working days from the date of receipt of this order.
9. The Appeal is accordingly disposed of.

Place: Mumbai

Date: September 17, 2026

RUCHI CHOJER

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