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

Appeal No. 7140 of 2026

Vikram Aggarwal	:	Appellant
	Vs	
CPIO, SEBI, Mumbai	:	Respondent

ORDER

1. The appellant had filed an application dated September 17, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 ("**RTI Act**"). The respondent, by a letter dated October 09, 2026, responded to the application filed by the appellant. The appellant filed an appeal dated October 10, 2026 (Reg. No. SEBIH/A/E/26/00389). 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 his application, sought the following information:

"1 I request copies of existing records held by SEBI concerning SCORES complaint SEBIE MH25 MUMB 018601 1 received on 13 May 2025 against Kotak Mahindra Bank Limited

The complaint record shows assignment to the entity on 13 May 2025 an entity ATR dated 28 May 2025 a first level review dated 28 May 2025 assignment to the Designated Body on 28 May 2025 a Designated Body ATR dated 29 May 2025 a second level review dated 29 May 2025 assignment to SEBI on 29 May 2025 and disposal on 29 May 2025 This application seeks only the procedural and system record and does not request reconsideration of the merits Please provide

1. *Copy or extract of the complete SCORES Action History transaction history and audit history for this complaint including all date time stamps status changes and workflow events.*
2. *Record showing the original complaint registration date category subject and all supporting documents recorded in SCORES*
3. *Copy of the Kotak Mahindra Bank ATR dated 28 May 2025 and all associated attachments and system metadata including reference 6888306 1*

4. *Copy of the first level review request dated 28 May 2025 and the record of assignment to the Designated Body*
5. *Copy of the Designated Body ATR dated 29 May 2025 and all associated attachments notes and system metadata*
6. *Copy of the second level review request dated 29 May 2025 and records showing assignment or copy marking to SEBI*
7. *Any SEBI OIAE note review record workflow note or internal communication concerning the second level review*
8. *Any system event status code workflow entry note communication or user action by which the complaint was disposed of on 29 May 2025*
9. *Any record showing classification referral routing or transfer of the complaint in whole or in part to Market Intelligence MINE or the Market Intelligence portal including date time destination and any reference number generated*
10. *Any record showing whether information from the SCORES complaint or attachments was transmitted to Market Intelligence rather than merely redirected to the complainant*
11. *If any requested record is maintained electronically in a database or audit log please provide the corresponding extract in electronic form to the extent reasonably retrievable without creating new information"*

3. **Reply of the Respondent –** The respondent, in response to query nos. 1 to 11 in the application, informed that the complaint handling process on SCORES is electronic and the ATR contains all information related to processing of the complaint. The respondent also stated that no separate file noting or internal examination notes are maintained outside the system. All actions, observations, clarification sought and responses received are recorded as part of the action history on SCORES, which is accessible after logging in with the credentials.

   Notwithstanding the aforesaid, the respondent had enclosed along with his response, copy of ATR provided by Kotak Mahindra Bank and Action History of the SCORES complaint (consisting of various details including date of registration of the complaint, flow of the complaint, first/second level review etc.).

   The respondent also informed that the appellant can refer to Frequently Asked Questions(FAQs) available on SCORES and SEBI website.

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

5. I have perused the application and the response provided thereto On consideration, I note that the respondent has categorically informed that all actions, observations, clarifications sought and responses received are recorded as part of the action history on SCORES, which is accessible to the appellant after logging in with his credentials on SCORES. The respondent also stated that no separate file noting or internal examination notes are maintained outside the system. In this context, I find it pertinent to cite the decision of Hon'ble Central Information Commission in *Lena Irene Mascarenhas vs. CPIO, SEBI* (Date of decision:

05.07.2024, Second Appeal No. CIC/SEBIH/A/2023/134832 & CIC/SEBIH/C/2023/615959). The applicant in the aforementioned case had also sought the details regarding action taken on her SCORES complaints, to which respondent had replied that action taken can be viewed on SCORES portal and that the information is not exclusively held by the public authority without access to the applicant. The Hon'ble CIC while upholding the aforementioned reply, had relied on the decision of Hon'ble Delhi High Court in *Registrar of Companies & Ors. Vs. Dharmendra Kumar Garg & Anr.* [W.P.(C) 11271/2009], wherein it was held that " *12. The RTI Act very clearly sets the course for the evolution of the RTI regime, which is that less and less information should be progressively held by public authorities, which would be accessed under the RTI Act and more and more of such held information should be brought into the public domain suo-motu by such public authority. Once the information is brought into the public domain it is excluded from the purview of the RTI Act and, the right to access this category of information shall be on the basis of whether the public authority discloses it free, or at such cost of the medium or the print cost price "as may be prescribed"."* 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.

RUCHI CHOJER
Digitally signed by RUCHI CHOJER
Date: 2026.11.06 11:17:30 +05'30'

Place: Mumbai
Date: November 06, 2026

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