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

Appeal No. 7128 of 2026

P. Sachithanantham : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated August 28, 2026 (received by SEBI on August 29, 2026) under the Right to Information Act, 2005 ("**RTI Act**"). The respondent, by a letter dated September 17, 2026, responded to the application filed by the appellant. The appellant filed an appeal dated September 30, 2026 (Reg. No. SEBIH/A/P/26/0072, received by the Office of Appellate Authority on October 06, 2026). 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) RTA returned my request of Transmission of shares, from father (expired) to son, 4 times as follows.

a) RTA seen Death Certificate (DC) in Tamil(Notorized)in mail, hence asked hard copies of all docmts to send. I sent all documts available with me along with DC. After seen hard copy of DC, returned my request after 2months (1st time) for only reason DC to be in English, notorized.

b) After seen in English, notorized, 2nd time Rta(after 5months) returned for DC notorized should be attested. Sebi in circular 65/2022 dt 18-05-22 stated only copy of DC notorized/attested. Sebi no-where stated DC not in vernacular language. lnvestor charter of Rta also stated the same. So I replied as no need to attest.

c) Rta returned request 3rd time(after 7months)for only query of name of deceased in DC & in Co record differs (even though having IPO ack copy applied during 1990 sent by me having with-it already).ln IPO appln name written after already printed Mr./Mrs./Miss.(in form Mrs.& Miss. sriked out).But Co added Mr.in it's record by itself.l replied suitably (But in one letter received by me without Mr.).

d) *4th time (after IO months) Rta returned to search share certificates in my house, if not found asked to apply for Name deletion & DUP CERT by attaching the relevant DUP CERT FORMATS ISR4, INDEMN, AFF & Paper advt. I replied as shares with RTA. Then after 2months Rta accepted shares with it.*

Thus RTA returned my request 4 times.

1) *Rta asked transmission related Affidavit & ISR5 forms after 5 months in 2nd return letter (by attaching the 2 formats) & the balance 2 formats Indemnity, NOC after 1 year, instead of asking in one instant. Already NOC in plain paper (since I am new to this) sent in my 1st request Ir. But NOC in format (by enclosing it with Indmty) asked after lyear.*
2) *Registration intimation of DC&LHC given by Rta to me one month before the ACTUAL REGISTRATION DONE. Is it possible.*

   So regn of DC ,LHC alone needed almost IO months scrutinization.

   If exact scrutiny done by RTA after seen DC in mail itself the un necessary delay due to return (one return can be done by rta) might have been -avoided.
3) *RTA asked 'NOC to be submitted separately by all other Legal Heirs NOT included in Legal Heir certificate'. Everybody in Co& Rta including Chairmn/Co, Compliance officer/Co & Rta stated this.l need meaning of this.*

   In RTA's investor service also quoted NOC from all other NON- CLAIMANTS only.
4) *Monthly return submitted to sebi by Rta on data of pending complaints received from investors every month in Annex B. If a FALSE REPORT OF 'NIL' for PENDING CASES more than 3 months is given to sebi for months together, even though my complaints given PENDING for more than a year, rule of action on co/ RTA will be given.*

   I made many mails to compliance officer/Co& RTA even to Chairman/CO, Director/RTA including speed Post letters to Chair/Co & Dir/Rta about returned letters.

   Everybody except Dir/Rta says to submit relevant forms to rta only. Nobody examining why 4 times the transmission request UN-WANTEDLY returned & took about 300days (10 times) for DC,LHC Regn alone, though 30 days only for transmission.

   If 30 days exceeded sebi action rule I need.

   For many mails & speed Post letter to Director/RTA, HE NOT AT ALL TURNED UP FOR THIS POOR SENIOR CITIZEN INVESTORS REQUEST.

   Giving apology to me & warningto concerned staff shall not calm my mental agony.

   so I need copies of PUNISHMENT rules in SEBI as requested for the above all un-necessary 4 times request returned & false reports & bit by bit calling transmission forms(ln IEPF if claim rejected by Iepf Authority due to not forwarding e-verification report by Nodal officer of Co, the Nodal officer and company shall be PUNISHABLE). Please send copies of rules.l pay necessary charges if you inform."

3. **Reply of the Respondent** – The respondent, in response to the application, stated 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 appellant's application is in the nature of seeking clarification/opinion from the respondent with respect to situational queries. 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 the matter of *Mr. Mahendra Kumar Mehta vs. CPIO, SEBI (*Judgment dated April 12, 2021), wherein, Hon'ble Central Information Commission observed that: "*9. This Commission observes that the appellant herein attempts to seek legal opinion/clarification from the CPIO to his situational queries with regard to 'the circular, rules, regulations, notification etc. regarding trading member for taking stock in pledge, collateral, or security for providing margin to do trade in reference to derivatives segment, charging of interest and GST, precaution to be taken by trading member for protection of constituents individual/HUF etc.'. Therefore, the CPIO is not supposed to interpret information; or to furnish replies to situational queries; or to furnish clarifications. Hence, such queries seeking legal opinion/clarification from the CPIO are not covered within the definition of 'information' u/Section 2(f) of the RTI Act, 2005. Accordingly, this Commission upholds the contention put forth by the CPIO."* 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: 2026.11.02 16:16:50 +05'30'

Place: Mumbai
Date: November 02, 2026

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