

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

**Appeal No. 6905 of 2026**

Dr. A.C. Mittal

:

Appellant

Vs

CPIO, SEBI, Mumbai

:

Respondent

**ORDER**

1. The appellant had filed an application dated April 07, 2026 received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated April 28, 2026 responded to the application filed by the appellant. The appellant filed an appeal dated May 27, 2026 (Reg. No. SEBIH/A/E/26/00200). 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 dated April 07, 2026 sought the following information:

*“Subject: Request for Information regarding SEBI Acts, Circulars, or Regulations concerning the transfer of physical share certificates under specific conditions.*

*Details of Information:*

*Please provide copies of or references to any Act, Rules, Regulations, or Circulars issued by SEBI from the year 1992 to the present date that permit or govern the following:*

*The legal validity of transferring ownership of equity shares in physical form without the submission of the original share certificates.*

*Provisions allowing the transfer of shares where the Share Certificate Numbers and Distinctive Numbers are not mentioned or are missing from the transfer deed or supporting documents all photocopies.*

*The acceptance of a Blank Indemnity Bond (an indemnity bond that does not contain specific share details such as certificate numbers, folio numbers, or distinctive numbers) for the purpose of duplicate share issuance or transfer of shares.*

*Any specific relaxation or Special Procedure circulars issued to R&T Agents (Registrars and Transfer Agents) allowing the processing of transfers in the absence of the aforementioned primary identifiers.*

*4. Period to which the information relates: 1992 to till date”*

3. **Reply of the Respondent** – The respondent, in response to the application, informed that the appellant can refer to SEBI Master Circular for Registrars to an Issue and Share Transfer Agents dated February 06, 2026 and Regulation 7 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The respondent also provided links for accessing the aforementioned Circular and Regulation.
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 all Regulations, Circulars and Guidelines issued by SEBI are made publicly available on SEBI website. Hence, I find that the requested information can be accessed by the appellant from SEBI website. In this context, I note that the Hon’ble Delhi High Court in *Registrar of Companies & ors. Vs. Dharmendra Kumar Garg & anr.* and the Hon’ble CIC in *Shri K Lall vs. Shri M K Bagri* (CIC/AT/A/2007/00112, order dated April 12, 2007) held that if the relevant information is available in the public domain, the same cannot be said to be information held by the public authority and consequently, there is no obligation to provide such information to an applicant under the RTI Act. Accordingly, I find that no further interference of this forum is warranted.
6. Notwithstanding the above, I find that the respondent has provided appropriate guidance to the appellant.

7. 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 24, 2026**

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