

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

**Appeal No. 6790 of 2026**

Rohit Aggarwal : Appellant  
Vs

CPIO, SEBI, Mumbai : Respondent

**ORDER**

1. The appellant had filed an application dated February 14, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated March 09, 2026 responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/26/00097) dated March 09, 2026. I have carefully considered the application, the response 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 February 14, 2026, sought the following information:

*“Subject Information regarding disposal of SCORES complaint against Invesco Mutual Fund relating to ARN 5812*

*With reference to the complaint filed by me on SEBI SCORES against Invesco Mutual Fund regarding non reprocessing of brokerage under ARN 5812 I seek the following information*

*1 Certified copy of complete complaint file maintained by SEBI in relation to my SCORES complaint*

*2 Certified copy of Action Taken Report submitted by Invesco Mutual Fund along with annexures and attachments*

*3 Certified copy of all internal note sheets file notings examination comments and officer remarks recorded by SEBI officials while processing and disposing my complaint*

*4 Whether SEBI independently examined the legality of treating already computed commission as forfeited in cases of deceased distributors*

5 Whether SEBI has issued any advisory guidance note or internal instruction regarding treatment of trail commission where brokerage was computed but payout failed due to bank closure after demise of distributor

6 Certified copy of final disposal note recorded by SEBI while closing my complaint

7 Whether SEBI obtained any internal legal opinion in relation to this complaint If yes kindly provide certified copy”

3. **Reply of the Respondent** – The respondent, in response to query nos. 1, 2, 3 and 6, informed that the entire complete history, including the Action Taken Reports filed by Invesco Mutual Fund, can be accessed through the SCORES login by the complainant.

The respondent, in response to query nos. 4, 5 and 7, 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** – 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. With regard to query nos. 1, 2, 3 and 6, the respondent has informed that the requested information can be accessed by the appellant by logging into the SCORES portal. Accordingly, I do not find any deficiency in the response of the respondent.
6. With regard to query nos. 4, 5 and 7, I find that the aforementioned queries are in the nature of seeking clarification/opinion/confirmation 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 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 Central Information Commission 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.

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: April 01, 2026**

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