

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

Appeal No. 6627 of 2025

Surinderpal Chananlal Sethi	:	Appellant
Vs		
CPIO, SEBI, Mumbai	:	Respondent

ORDER

1. The appellant had filed two applications (SEBIH/R/P/25/00235 and SEBIH/R/P/25/00236) dated September 23, 2025 (received by SEBI on September 26, 2025) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated October 13, 2025, responded to the applications filed by the appellant. The appellant filed an appeal dated November 16, 2025 (received by the Office of Appellate Authority on November 20, 2025). I have perused the applications, 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 (SEBIH/R/P/25/00235 & SEBIH/R/P/25/00236)**- The appellant, vide his applications dated September 23, 2025, had sought certified copy of application for subscription to shares and letter of allotment of Gujrat Godrej Innovative Chemicals Limited under promoters quota.
3. **Reply of the Respondent** - The respondent, in response to the applications, informed that the information sought is not maintained by SEBI in normal course of regulation of securities market. Hence, the same is not available with SEBI. Notwithstanding the aforesaid, the respondent informed that the appellant can approach the concerned Registrar and Share Transfer Agent in this regard.
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. I note that the respondent has categorically stated that the requested information is not available with SEBI. I note that the respondent can only provide information that is available in the records. In this context, I note that the Hon'ble Supreme Court of India in *Central Board of Secondary Education & Anr. vs. Aditya Bandopadhyay & Ors* (Judgment dated August 9, 2011) held that *"The RTI Act provides access to all information that is available and existing. This is clear from a combined reading of section 3 and the definitions of 'information' and 'right to information' under clauses (f) and (j) of section 2 of the Act. If a public authority has any information in the form of data or analysed data, or abstracts, or statistics, an applicant may access such information, subject to the exemptions in section 8 of the Act. But where the information sought is not a part of the record of a public authority, and where such information is not required to be maintained under any law or the rules or regulations of the public authority, the Act does not cast an obligation upon the public authority, to collect or collate such non-available information and then furnish it to an applicant."* Further, I note that the Hon'ble Central Information Commission in the matter of *Sh. Pattipati Rama Murthy vs. CPIO, SEBI* (Decision dated July 8, 2013), held: *"... if it (SEBI) does not have any such information in its possession, the CPIO cannot obviously invent one for the benefit of the Appellant. There is simply no information to be given."* 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.

Place: Mumbai

Date: December 12, 2025

RUCHI CHOJER

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