

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

**Appeal No. 6681 of 2026**

Geeta Khattar

: Appellant

Vs

CPIO, SEBI, Mumbai

: Respondent

**ORDER**

1. The appellant had filed an application dated December 04, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 ("RTI Act"). The respondent, by a letter dated January 02, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/26/00004) dated January 06, 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 her application dated December 04, 2025, sought the following information:

*"1. Provide a list of Stockbrokers whom SEBI has permitted to alter the Govt prescribed format of Bills / Invoices / Contract Notes and who have been permitted to club Exchange Transaction Charges, SEBI Fee, and Stamp Duty and can debit in together Form.*

*2. Provide the rate(s) at which HDFC Securities has been permitted by SEBI, NSE, or BSE to club the following levies in its Bills / Invoices / Contract Notes, Exchange Transaction Charges, SEBI Fee, and Stamp Duty under the Delivery Base Trade and Intraday Trade.*

*3. Provide the specific Act, Regulation, Circular, Section, Clause number, etc., under which Stockbrokers, including qualified Stockbrokers, can alter the format of Bills / Invoices / Contract Notes without obtaining prior approval from SEBI, NSE, BSE, or any other competent authority.*



4. Provide the date from which the CPIO, SEBI, has been authorized by SEBI or any other authority not to apply Section 11 or other Sections, provisions of RTI Act, 2005.
5. Provide the date from which SEBI dealing officials have been permitted by SEBI to act without applying the mandatory rules, regulations, provisions, etc. of the Securities laws.
6. Provide the date from which the CPIO, SEBI, has been granted permission by SEBI to deny or avoid responding to RTI queries that fall within the ambit of the RTI Act, 2005.
7. Provide the Section or provision of the RTI Act, 2005, under which the CPIO, SEBI, may perform duties or take actions beyond the queries submitted by an information seeker.
8. Provide the date from which Mr. Amit Pradhan (Regional Director) and Mr. Santosh Kumar Sharma, CGM have been authorized to deal with applications on the CVC (Central Vigilance Commission) online portal.
9. Provide the names of officials currently appointed in the Vigilance Department of SEBI who are authorized to deal with applications on the CVC online portal.
10. Provide the Act, Regulations, Circular, or legal authority under which the Chief Vigilance Officer (CVO), SEBI, may transfer applications to other SEBI officials, despite being mandated to deal with such applications on the CVC online portal.
11. Provide the name of the authority through whom Stockbrokers may obtain permission to alter the Govt. prescribed format of Bills / Invoices / Contract Notes.
12. Provide the names of SEBI officials, if any, who have been authorized to violate or breach the laws, regulations, provisions, etc., issued by the Central Government, SEBI, NSE, BSE, or any other competent authority.
13. Provide the specific law, rule, regulation, circular, order, or authority under which SEBI may block an investor from accessing the SCORES online portal without issuing a written notice and without providing documentary proof of any violation allegedly committed by the investor and further, under which provision SEBI may unlock or restore access to the SCORES portal without issuing a written notice.
14. Provide the Order, authority, rule, or legal provision under which officials of the OIAE (Office of Investor Assistance and Education), SEBI, are permitted to deal with applications and matters belonging to other departments, including those pertaining to the Chief Vigilance Officer (CVO) / Vigilance Department”



3. **Reply of the Respondent** – The respondent, in response to query nos. 1 and 2 in the application, informed that the information sought is hypothetical in nature. Accordingly, the same cannot be construed as "information", as defined u/s 2(f) of the RTI Act. Notwithstanding the aforesaid, the respondent informed that appellant can refer to SEBI Master Circular on Stock Brokers and FAQs which are available on SEBI website.

The respondent, in response to query no. 3, informed that appellant can refer to clause B (2) of Code of Conduct specified under Schedule II of Securities and Exchange Board of India (Stock Brokers) Regulations, 1992 which is available in public domain on SEBI website.

The respondent, in response to query nos. 4, 5, 6, 7, 8, 11, 12 and 14, informed that the queries are hypothetical in nature and 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.

The respondent, in response to query nos. 9 and 10, informed that Vigilance Department does not receive any application from CVC online portal.

The respondent, in response to query no. 13, informed that appellant can refer to Frequently Asked Questions (FAQs) 32, 33 and 34 which is available on SCORES website.

4. **Ground of appeal** – The appellant has filed the appeal on the ground that she 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, 4, 5, 6, 7, 8, 11, 12 and 14, I concur with the response of the respondent that the information sought is in the nature of hypothetical/situational queries. I find that the said queries cannot be construed as seeking 'information' as defined under section 2(f) of the RTI Act. In this context, I note that the Hon'ble CIC, in the matter of *V R Srinivasan vs. CPIO, SEBI* (Order dated January 19, 2023), held that, "*The Commission opined that the appellant has not sought any material information as defined in section 2(f) of the RTI Act, 2005 and his queries were totally based upon a hypothetical situation, therefore, the denial of information was proper.*" Accordingly, I do not find any deficiency in the response of the respondent.

6. With regard to query nos. 3, 9, 10 and 13, I find that the respondent has adequately addressed the queries by providing the information available with 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: February 02, 2026



RUCHI CHOJER

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