

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

Appeal No. 6663 of 2026

Dhanraj Bagrecha : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated October 24, 2025 (received by SEBI on October 31, 2025) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated November 27, 2025, responded to the application filed by the appellant. The appellant filed an appeal dated December 15, 2025 (received by the Office of Appellate Authority on December 18, 2025). 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, vide his application dated October 24, 2025, sought the ‘Act’ adopted by the SEBI in his matter.
3. **Reply of the Respondent -** The respondent, in response to the application, informed that the query is vague and not specific. 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 query is vague and not specific. It is an established law that the information sought for in order to be disclosable under the RTI Act, must be clear, specific and available in the records of the public authority. In this

context, I note that in the matter of *Mr. T. V. Sundaresan vs. CPIO, Securities and Exchange Board of India* (Decision dated November 24, 2021), the Hon'ble Central Information Commission (**CIC**) held: “*The framework of the RTI Act, 2005 expects that the information sought is specific and believed to be existing with the public authority in documented or material form as such; which can be shared with the appellant as per the provisions of the RTI Act. Answering to broad, multiple and general queries and presumptive documents that should have been generated as per the expectation of the appellant cannot be furnished under the provisions of the Act.*” Accordingly, I do not find any deficiency in the response of the respondent.

6. Further, I note that the appellant has been filing repeated/similar RTI applications pertaining to his grievance relating to the non-receipt of shares and dividends of Tata Consultancy Services Limited (TCS). Orders (Appeal No. 6483 of 2025 dated August 06, 2025, Appeal No. 5977 of 2024 dated April 24, 2024, Appeal No. 5543 of 2022 dated January 23, 2023, Appeal No. 4452 of 2021 dated October 11, 2021, Appeal No. 3963 of 2020 dated December 01, 2020, Appeal No. 3934 of 2020 dated November 03, 2020, Appeal No. 3544 of 2019 dated September 16, 2019 and Appeal No. 3430 of 2019 dated May 27, 2019), have also been issued by FAA regarding the appeals that were filed. I also find that present application is also on the same subject matter. In the context of filing repetitive requests under RTI Act, the Hon'ble CIC in the matter of *Shri Ramesh Chand Jain vs. Delhi Transport Corporation, GNCTD, Delhi* (File No. CIC/AD/A/2013/001326-SA decided on June 25, 2014) held that “*The universal principles of civil justice also recognized 'constructive res judicata', which in the RTI context means when an applicant uses an opportunity of obtaining information on a particular subject as per law, he is expected to seek all the related information in that first ever opportunity itself. He cannot file another application for a bit or piece which he forgot to ask, or not advised by his lawyer, or for any other reason. He should ask all possible aspects of information about that subject matter, in the first ever available opportunity. Even if he does not, it is presumed by law that he asked for that and was refused after due trial..... Thus, once information is given, applicant shall not seek the same once again in the guise of different form or language. If the applicant seeks information again and again, the PIO, the First Appellate Authority and the Commission would be forced to spend their time on this repeated application, and in the process the authorities would lose that much time to address the other RTI applications or performing their general duties in their public office. Repeated RTI applications will amount to clogging the office of public authority and CPIO would be justified in refusing the same with intimation of reasons. Because the repeated RTI application has an effect of clogging the public offices, it would amount to obstructing the free flow of information to deserving and genuine RTI applicants, besides preventing the officers from performing their general duties attached to their office*”.

7. Additionally, I also find that in the Order dated April 24, 2024 in Appeal No. 5977 of 2024 passed in similar appeal filed by the appellant, FAA has observed that: *“the manner in which the information has been sought in the instant RTI application is highly disorganised and challenging to interpret. The appellant has interjected comments and notes within the supporting documents he has submitted along with the application, thereby, complicating the understanding of his requests. As a result, significant time and effort is required by the public authority to unravel/comprehend the information being sought and process it effectively. Similar approach is also noted in the way the appellant has filed the instant appeal.”*. Despite the aforementioned observation, I note that the present appeal has also been filed in the same disorganised manner.
8. 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: January 14, 2026

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