

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

Appeal No. 6764 of 2026

Geeta Khattar : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated December 27, 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 14, 2026, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/26/00079) dated February 20, 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 27, 2025, sought the following information:

“ 1. *Action History of CPGRAMS Application,*

Kindly provide a certified copy of the complete Action History of CPGRAMS application bearing Registration No. DARPG/D/2025/0003168, including all internal notes, remarks, dates of action taken, movement between departments, and the final disposal details. (It is submitted that the Action History is not available for public viewing on the CPGRAMS online portal. A copy of the Action History of another CPGRAMS application is enclosed only as a sample to illustrate the nature of the information sought.)

2. *Posting Details of SEBI Officer,*

Kindly inform the department/division in SEBI in which Mr. Surendra Gangavarapu, Deputy General Manager, is presently appointed/posted, along with the nature of his official responsibilities in that department.

3. *Disclosure of Authority for Non Mention of Department Name,*

Kindly provide a certified copy of the order, office memorandum, circular, guideline, or any other official instruction, if any, issued by SEBI or any competent authority, under which SEBI officials are permitted or directed not to disclose or mention their department/division name in communications, replies, or actions taken on applications/complaints, including those processed through the CPGRAMS portal, and instead disclose only their designation, as reflected in the attached CPGRAMS Registration No. DARPG/D/2025/0003168.

4. Details of Authority and Officials Issuing Instructions,

Kindly provide the name of the department/division and the names and designations of the competent authority/official(s) who issued or approved the order, office memorandum, circular, guideline, or any other written instruction, if any, permitting or directing SEBI officials not to disclose or mention their department/division name in communications, replies, or actions taken on applications/complaints, including those processed through the CPGRAMS portal, and instead disclose only their designation, as reflected in CPGRAMS Registration No. DARPG/D/2025/0003168.

In case no such written instruction exists, kindly provide a clear and categorical statement to that effect, along with the name and designation of the officer responsible for adopting or allowing such practice.

5. Authority Competent to Rectify Non-Availability of Information,

Kindly provide the designation/rank of the SEBI official(s) who are competent and authorized, under any Act, rule, regulation, office order, or administrative instruction ,, to rectify ,, the incomplete information as reflected in the CPGRAMS Registration No. DARPG/D/2025/0003168.

*Further, kindly provide a certified copy of the relevant provision/order defining such powers, hierarchy, and responsibility.
.”*

3. **Reply of the Respondent** –The respondent, in response to query no.1 in the application, informed that the queries pertaining to CPGRAMS complaint can be sought directly from CPGRAMS website.

The respondent, in reply to query no. 2, stated that the information regarding SEBI Officers, their current posting, contact details, functions of different departments, powers and duties of officers are available on SEBI website and can be accessed under the RTI Section “Disclosures under section 4(1)(B) of the Right to Information Act, 2005”. (Sl. No. 1-3 and Sl Nos. 9 in disclosures under section 4(1)(b).

The respondent, in response to query nos. 3, 4 and 5, that the queries are hypothetical in nature and in the nature of seeking clarification. Accordingly, the same cannot be construed as “information”, as defined under section 2(f) of the RTI Act.

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 no. 1, I note that the respondent has informed that the requested information can be accessed from the CPGRAMS website. Hence, I find that the respondent has adequately addressed the query.
6. With regard to query no.2, I note that the respondent has informed that the requested information can be accessed by the appellant from the SEBI website. Hence, I find that the requested information is available in the public domain. 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 do not find any deficiency in the said response of the respondent.
7. With regard to query nos. 3, 4 and 5, 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.

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: March 16, 2026

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