

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

Appeal No. 6582 of 2025

Devangi Dipak Panchal : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated September 10, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated September 26, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00264) dated September 29, 2025. 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 September 10, 2025, sought the following information:

“ (A) *Concerned Department :*

Integrated Surveillance Department (ISD), SEBI Shri S. Ramann, Officer on Special Duty (OSD), issued a Show Cause Notice bearing reference No. ISD/SR/BJD/SCN/186094/2009 dated December 1, 2009 to the applicant, under Sections 11, 11(4) and 11B of the SEBI Act, 1992.

(B) *Particulars of information required:*

(1) Please mention Grade and / or position level of the Officer On Special Duty (OSD) as on 01.12.2009.

(2) Kindly provide me the certified copy of the APPOINTMENT ORDER and / or AUTHORITY LETTER which specifically authorized Shri S. Ramann to issue the aforementioned Show Cause Notice.

(C) Period for which information asked for: As mentioned in Section (A) above (pertaining to the Show Cause Notice dated December 1, 2009)”

3. **Reply of the Respondent** –The respondent, in response to query no. B (1) in the application, informed that Shri S. Raman, Officer on Special Duty (**OSD**) was on deputation to SEBI in the Grade of Chief General Manager (**CGM**), as on 01.12.2009.

The respondent, in response to query no. B(2), informed that the details of delegation powers including power to approve for issuance of show cause notice is available on SEBI website. The respondent also informed that as per delegation of power, at the relevant point of time, the competent authority for approving the Show Cause Notice (SCN) was Whole Time Member (WTM) and SCN issuing authority was CGM. Mr. S. Ramann being the OSD was holding the position of Chief General Manager.

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 respect to query no. B (1), I find that the respondent has adequately addressed the query by providing the information available with him. Accordingly, I do not find any deficiency in the response of the respondent.
6. With respect to query no. B(2), I note that the appellant has contended that the document in the link provided by the respondent is of the year 2019 whereas the information sought by her pertains to the year 2009. Hence, the appellant has contended that requested information was not provided to her. In my view, the respondent was obliged to ascertain availability of the requested information with SEBI and whether the same may be provided to the appellant in accordance with the provisions of the RTI Act. Accordingly, on consideration, I find that the query no. B(2), has not been adequately addressed by the respondent and the same warrants reconsideration.
7. Considering the above observations, I remit the application to the respondent for *de novo* consideration of the query no. B(2), in the application and sending appropriate response to the appellant in terms of RTI Act, within 15 working days from the date of receipt of this order.

8. The appeal is accordingly disposed of.

Place: Mumbai

Date: October 14, 2025

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