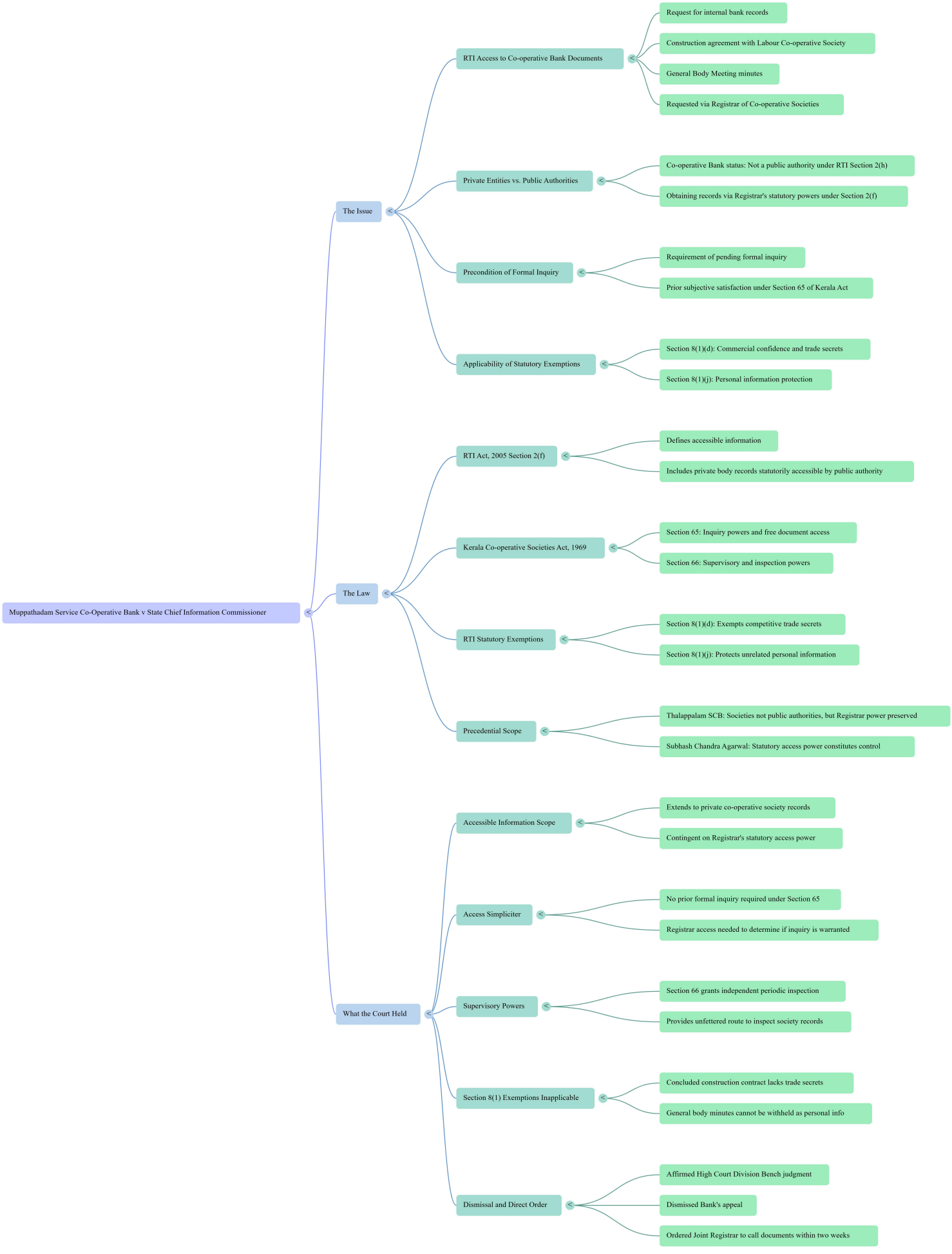

Muppathadam Service Co-Operative Bank v State Chief Information Commissioner
The Issue
RTI Access to Co-operative Bank Documents
Request for internal bank records
Construction agreement with Labour Co-operative Society
General Body Meeting minutes
Requested via Registrar of Co-operative Societies
Private Entities vs. Public Authorities
Co-operative Bank status: Not a public authority under RTI Section 2(h)
Obtaining records via Registrar's statutory powers under Section 2(f)
Precondition of Formal Inquiry
Requirement of pending formal inquiry
Prior subjective satisfaction under Section 65 of Kerala Act
Applicability of Statutory Exemptions
Section 8(1)(d): Commercial confidence and trade secrets
Section 8(1)(j): Personal information protection
The Law
RTI Act, 2005 Section 2(f)
Defines accessible information
Includes private body records statutorily accessible by public authority
Kerala Co-operative Societies Act, 1969
Section 65: Inquiry powers and free document access
Section 66: Supervisory and inspection powers
RTI Statutory Exemptions
Section 8(1)(d): Exempts competitive trade secrets
Section 8(1)(j): Protects unrelated personal information
Precedential Scope
Thalappalam SCB: Societies not public authorities, but Registrar power preserved
Subhash Chandra Agarwal: Statutory access power constitutes control
What the Court Held
Accessible Information Scope
Extends to private co-operative society records
Contingent on Registrar's statutory access power
Access Simpliciter
No prior formal inquiry required under Section 65
Registrar access needed to determine if inquiry is warranted
Supervisory Powers
Section 66 grants independent periodic inspection
Provides unfettered route to inspect society records
Section 8(1) Exemptions Inapplicable
Concluded construction contract lacks trade secrets
General body minutes cannot be withheld as personal info
Dismissal and Direct Order
Affirmed High Court Division Bench judgment
Dismissed Bank's appeal
Ordered Joint Registrar to call documents within two weeks