

::आयुक्त (अपील्स) का कार्यालय,वस्तु एवं सेवा करऔरकेन्द्रीय उत्पाद शुल्कः: O/O THE COMMISSIONER (APPEALS), GST &CENTRAL EXCISE

द्वितीय तल,जी एस टी भवन / 2nd Floor, GST Bhavan रेस कोर्स रिंग रोड / Race Course Ring Road

<u>राजकोट / Rajkot - 360 001</u>

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DIN20221164SX000000BBDD

अपील / फाइलसंख्या/ Appeal /File No. V2/29/BVR/2022

क

मूल आदेश सं / O.I.O. No. 308:/SERVICE TAX / DEMAND/ 2021-22 विनांक/Date 03-Feb-22

अपील आदेश संख्या(Order-In-Appeal No.):

BHV-EXCUS-000-APP-084-2022

आदेश का दिनांक / Date of Order: 11.11.2022

जारी करने की तारीख / Date of issue:29.11.2022

श्री शिव प्रताप सिंह, आयुक्त (अपील्स), राजकोट द्वारा पारित /

Passed by Shri Shiv Pratap Singh, Commissioner (Appeals), Rajkot.

ग अपर आयुक्त/ संयुक्त आयुक्त/ उपायुक्त/ सहायक आयुक्त, केन्द्रीय उत्पाद शुल्क/ सेवाकर/वस्तु एवंसेवाकर,राजकोट / जामनगर / गांधीधाम। द्वारा उपरक्षिक्षित जारी मूल आदेश से सुजित: /

Arising out of above mentioned OIO issued by Additional/Joint/Deputy/Assistant Commissioner, Central Excise/ST / GST, Rajkot / Jamnagar / Gandhidham:

अपीलकर्ता के प्रतिवादी का नाम एवं पता /Name & Address of the Appellant & Respondent :-

M/s. Hanifbhai isabhai Matva (Sahakar Trading Co.), Near Bus Station Palitana Dist. Bhavnagar-364270

इस आदेश(अपील) से व्यथित कोई व्यक्ति निम्नलिखित तरीके में उपयुक्त प्राधिकारी / प्राधिकरण के समक्ष अपील दायर कर सकता है।/ Any person aggrieved by this Order-in-Appeal may file an appeal to the appropriate authority in the following way.

सीमा शुल्क कंन्द्रीय उत्पाद शुल्क एव संवाकर अपीलीय न्यायाधिकरण के प्रति अपील, केन्द्रीय उत्पाद शुल्क आधीनयम,1944 की धारा 35B के अंतर्गत एव (A) वित्त अधिनियम, 1994 की धारा 86 के अंतर्गत निम्नलिखित जगह की जा सकती है।/

Appeal to Customs, Excise & Service Tax Appellate Tribunal under Section 35B of CEA, 1944 / Under Section 86 of the Finance Act, 1994 an appeal lies to:-

(i) वर्गीकरण मूल्यांकन से सम्बन्धित सभी मामले सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण की विशेष पीठ, वेस्ट ब्लॉक नं 2, आर॰ के॰ पुरम, नई दिल्ली, को की जानी चाहिए।/

The special bench of Customs, Excise & Service Tax Appellate Tribunal of West Block No. 2, R.K. Puram, New Delhi in all matters relating to classification and valuation.

(ii) उपरोक्त परिच्छेद 1(a) में बताए गए अपीलों के अलावा शेष सभी अपीलें सीमा शुष्क केंद्रीय उत्पाद शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण (सिस्टेट)की पश्चिम क्षेत्रीय पीठिका,,द्वितीय तल, बहुमाली भवन असावा अहमदाबाद- ३८००१६कों की जानी चाहिए।/

To the West regional bench of Customs, Excise & Service Tax Appellate Tribunal (CESTAT) at, 2nd Floor, Bhaumali Bhawan, Asarwa Ahmedabad-380016in case of appeals other than as mentioned in para- 1(a) above

(iii) अपीलीय न्यायाधिकरण के समक्ष अपील प्रस्तृत करने के लिए केन्द्रीय उत्पाद शुल्क (अपील)नियमावली, 2001, के नियम 6 के अंतर्गत निर्धारित किए गये प्रपत्न EA-3 को चार प्रतियों में दर्ज किया जाना चाहिए। इनमें से कम से कम एक प्रति के साथ, जहां उत्पाद शुल्क की मान क्याज की मान और लगाया गया जमाना, हपए 5 लाख वा उससे क्या, 5 साख क्या 150 लाख कपए तक अयोग 50 लाख कपए से अधिक है तो क्रमत: 1,000/- रुपय, 5,000/- रुपय अववा 10,000/- रुपय को निर्धारित जमा शुल्क की प्रति संसम् करें। निर्धारित शुल्क का भगतान, संबंधित अपीलीय न्यायाधिकरण की शाखा के सहायक राजिस्टार के नीम से किसी भी सार्वजिनक क्षेत्र के बैंक द्वारा जारी रेखांकित बैंक हाएट द्वारा किया जाना चाहिए। संबंधित हाफ्ट का मुगतान, बैंक की उस शाखा में होना चाहिए जहां संबंधित अपीलीय न्यायाधिकरण की शाखा स्थित है। स्थमन आदेश (स्टे ऑक्टर) के लिए आवेदन-पत्र के सीथ 500/- रुपए का निर्धारित शुल्क जमा करना होगा।/

The appeal to the Appellate Tribunal shall be filed in quadruplicate in form EA-3 / as prescribed under Rule 6 of Central Excise (Appeal) Rules, 2001 and shall be accompanied against one which at least should be accompanied by a fee of Rs. 1,000/- Rs.5000/- Rs.10,000/- where amount of dutydemand/interest/penalty/refund is upto 5 Lac., 5 Lac to 50 Lac and above 50 Lac respectively in the form of crossed bank draft in favour of Asst. Registrar of branch of any nominated public sector bank of the place where the bench of any nominated public sector bank of the place where the bench of stay shall be accompanied by a fee of Rs. 500/-

अपीलीय न्यायाधिकरण के समक्ष अपील, बिल अधिनियम, 1994 की धारा 86(1) के अंतर्गत सेवाकर नियमवाली, 1994, के नियम 9(1) के तहत निर्धारित प्रपत्र S.T.-5 में चार प्रतियों में की जा सकेगी एवं उसके साथ जिस आदेश के विष्टूब अपील की गयी हो, उसकी प्रति साथ में संसग्न करें (उनमें से एक प्रति प्रमाणित होनी चाहिए) और इनमें से कम से कम एक प्रति के साथ, जहीं सेवाकर की मौग, जान की मौग और लगाया गया जुमीना, रुपए 5 लाख यो उससे कम, 5 लाख रुपए यो 50 लाख रुपए तक अथवा 50 लाख रुपए से अधिक है तो क्रमश: 1,000/- रुपये, 5,000/- रुपये अथवा 10,000/- रुपये का निर्धारित जमा शुल्क की प्रति संलग्न करें। निर्धारित शुल्क का भुगतान, संबंधित अपीलीय न्यायाधिकरण की शाखा के सहायक रिजेस्टार के नाम से किसी में सिर्धार के सेवाक की प्रति संलग्न करें। निर्धारित शुल्क का भुगतान, संबंधित अपीलीय न्यायाधिकरण की शाखा के सहायक रिजेस्टार के नाम से किसी में साविजनक क्षेत्र के बैंक द्वारा जारी रेखांकित बैंक इपिर द्वारा किया जाना चाहिए । संबंधित अपीलीय न्यायाधिकरण की शाखा में होना चाहिए जहां संबंधित अपीलीय न्यायाधिकरण की शाखा स्थार है। स्थान आदेश (स्ट ऑंडर) के लिए आवर्षन-पत्र के साथ 500/- रुपए का निर्धारित शुल्क जमों करना होगा।/

The appeal under sub section (1) of Section 86 of the Finance Act, 1994, to the Appellate Tribunal Shall be filed in quadruplicate in Form S.T.5 as prescribed under Rule 9(1) of the Service Tax Rules, 1994, and Shall be accompanied by a copy of the order appealed against (one of which shall be certified copy) and should be accompanied by a fees of Rs. 1000/- where the amount of service tax & interest demanded & penalty levied is more accompanied by a fees of Rs. 5000/- where the amount of service tax & interest demanded & penalty levied is more than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest than five lakhs but not exceeding Rs. Fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest demanded & penalty levied is more than fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest demanded & penalty levied is more than fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest demanded & penalty levied is more than fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest demanded & penalty levied is more than fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest demanded & penalty levied is more than fifty Lakhs, Rs. 10,000/- where the amount of service tax & interest demanded & penalty levied is more tax.

R)

केन्द्रीय उद्गी

(i)

(ii)

भारत सरकार कोपनरीक्षण आवेदन :
Revision application to Government of India:
इस आदेश की प्रिरोक्षण आवेदन के अंदर्गत अस्ति उत्पाद शुक्क अधिनियम, 1994 की धारा 35EE के प्रथमपूरंदुक के अंदर्गत अवर सचिव,
भारत सरकार, प्रिरोक्षण आवेदन केंबा, विच मंत्रालय, राजस्व विभाग, चौथी मंजिल, जीवन दीप भवन, संसद मार्थ, नई दिल्ली-110001, को किया
जाना चाहिए।
A revision application lies to the Under Secretary, to the Government of India, Revision Application Unit,
Ministry of Finance, Department of Revenue, 4th Floor, Jeevan Deep Building, Parliament Street, New Delhi110001, under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to subsection (1) of Section-35B ibid: (C)

यदि माल के किसी नुकसान के मामसे में, जहां नुकसान किसी माल को किसी कारखाने से मंडार गृह के पारगमन के दौरान या किसी अन्य कारखाने या फिर किसी एक मंडार गृह से इसरे मंडार गृह पारगमन के दौरान, या किसी मंडार गृह में या भंडारण में माल के प्रसंस्करण के दौरान, किसी कारखाने या किसी भंडार गृह में माल के नुकसीन के मामले में।/
In case of any loss of goods, where the loss occurs in transit from a factory to a warehouse or to another factory or from one warehouse to another during the course of processing of the goods in a warehouse or in storage whether in a factory or in a warehouse (i)

मारत के बाहर किसी राष्ट्र या क्षेत्र को निर्यात कर रहे माल के निनिर्माण में प्रमुक्त कक्के माल पर गरी गई केन्द्रीय उत्पाद शुल्क के छुट (रिबेट) के मामले में, जो भारत के बाहर किसी राष्ट्र या क्षेत्र को निर्यात की गयी है। / In case of rebate of duty of excise on goods exported to any country or territory outside India of on excisable material used in the manufacture of the goods which are exported to any country or territory outside India. (ii)

यदि उत्पाद शुल्क का भुगवान किए बिना भारत के बाहर, नेपाल या भूटान की माल निर्यात किया गया है। / In case of goods exported outside India export to Nepal or Bhutan, without payment of duty. (iii)

सुनिश्चित उत्पाद के उत्पादन शुल्क के भुगदान के लिए जो ड्यूटी केडीट इस अधिनियम एवं इसके विभिन्न प्रावधानों के तहत मान्य की गई है और ऐसे आदेश जी आयुक्त (अपील) के द्वारा विश्व अधिनियम (न॰ 2),1998 की धारा 109 के द्वारा नियत की गई तारीख अधवा सभायाविधि पर या बाद में पारित किए गए हैं। Credit of any duty allowed to be utilized towards payment of excise duty on final products under the provisions of this Act or the Rules made there under such order is passed by the Commissioner (Appeals) on or after, the date appointed under Sec. 109 of the Finance (No.2) Act, 1998.

उपरोक्त आवेदन की दो प्रतियां प्रपन्न संक्या EA-8 में, जो की केन्द्रीय उत्पादन शुक्त (अपील)नियमावली,2001, के नियम 9 के अंतर्गत विनिर्दिष्ट है, इस अदेश के अपेश के उत्पाद की जानी चाहिए। उपरोक्त अवेदन के साथ मूल आदेश व अपील आदेश की दो प्रतियां संस्थ्र की जानी चाहिए। साथ ही केन्द्रीय उत्पाद शुक्त अधिनयम, 1944 की बारा 35-EE के तहत निर्धारित शुक्त की अदायगी के साक्ष्य के तौर पर TR-6 की प्रति संलग्न की जानी चाहिए। /
The above application shall be made in duplicate in Form No. EA-8 as specified under Rule, 9 of Central Excise (Appeals) Rules, 2001 within 3 months from the date on which the order sought to be appealed against is communicated and shall be accompanied by two copies each of the OIO and Order-In-Appeal. It should also be accompanied by a copy of TR-6 Challan evidencing payment of prescribed fee as prescribed under Section 35-EE of CEA, 1944, under Major Head of Account. (v)

पुनरीक्षण आवेदन के साथ निम्नलिखित निर्धारित शुल्क की अदायगी की जानी चाहिए। जहाँ सेनग्न रक्षम एक नाख रूपये या उससे कम हो तो रूपये 200/- का भुगतान किया जाए और यदि संनग्न रक्षम एक लाख रूपये से ज्यादा हो तो रूपये 1000-/ का भुगतान किया जाए। The revision application shall be accompanied by a fee of Rs. 200/- where the amount involved in Rupees One Lac or less and Rs. 1000/- where the amount involved is more than Rupees One Lac. (vi)

यदि इस आदेश में कई मूल आदेशों का समावेश है तो अत्येक मूल आदेश के लिए शुल्क का मुगतान, उपर्युक्त ढंग से किया जाना चाहिया इस तथ्य के होते हुए भी की लिखा पढ़ी कार्य से बचन के लिए बचास्थिति अपीलीय नयाधिकरण को एक अपील या केहीय सरकार को एक आवेशन किया जाता है। / In case, if the order covers various umbers of order- in Original, fee for each C.i.O. should be paid in the aforesaid manner, notwithstanding the fact that the one appeal to the Appellant Tribunal or the one application to the Central Govt. As the case may be, is filled to avoid scriptoria work if excising Rs. 1 lakh fee of Rs. 100/- for each. (D)

यथासंशोधित न्यायालय शुल्क अधिनियम, 1975, के अनुसूची-I के अनुसार मूल आदेश एवं स्थान आदेश की प्रति पर निर्धारित 6.50 रुपये का न्यायालय शुल्क टिकिट लगा होना चाहिए। / One copy of application or O.I.O. as the case may be, and the order of the adjudicating authority shall bear a court fee stamp of Rs.6.50 as prescribed under Schedule-I in terms of the Court Fee Act, 1975, as amended. **(E)**

सीमा शुल्क, केन्द्रीय उत्पाद शुल्क एवं सेबाकर अपीलीय न्यायाधिकरण (कार्य विधि) नियमावली, 1982 में वर्णित एवं अन्य संबन्धित मामलों को सम्मिलित करने वाले नियमों की और भी ह्वान व्यक्तिय किया जाता है। / Attention is also invited to the rules covering these and other related matters contained in the Customs, Excise and Service Appellate Tribunal (Procedure) Rules, 1982. (F)

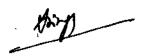
उच्च वर्पीलीय प्राष्टिकारी को जपील दाखिल करने से संबंधित व्यापक, विस्तृत और नवीनतम प्रावधानों के लिए, अपीलार्थी विभागीय वेबसाइट www.cbec.gov.in को देख सकते हैं। / For the claborate, detailed and latest provisions relating to filing of appeal to the higher appellate authority, the appellant may refer to the Departmental website www.cbec.gov.in. (G)



:: अपील आदेश / ORDER-IN-APPEAL ::

- M/s. Matva Hanifbhai Isabhai, Palitana, Bhavnagar (hereinafter referred to as "Appellant") has filed Appeal No. V2/29/BVR/2022 against Order-in-Original No. 308/SERVICE TAX/DE/MAND/2021-22 dated 02.03.2022 (hereinafter referred to as 'impugned order') passed by the Assistant Commissioner, Central GST Division-I, Bhavnagar (hereinafter referred to as 'adjudicating authority').
 - The facts of the case, in brief, are that on the basis data/ detail. 2. provided by the Income Tax Department it was found that various persons ite Income Tax Assessee, who declared in their Income Tax Returns for financia: year 2014-15 to had earned income by providing services classified under various service sectors. The Income Tax Department had also provided data of Form 26AS showing details of total amount paid/ credited under Section 194C, 1945 1941 & 194J of the Income Tax Act, 1961 in respect of various persons which depicts that such persons had earned income from providing services like. contract, commission or brokerage, renting of movable/ immovable property Technical or Professional service etc. The said data also contained the details $\sigma_{\rm s}^{\rm s}$ the Appellant who had not obtained Service Tax Registration under the Finance Act, 1994 (hereinafter referred to as 'the Act'). The Jurisdictional Superintendent issued letter dated 20.07.2020 to the Appellant calling for the details viz. copies of I. T. Returns, Form 26AS, Balance sheet (including P&I Account), VAT/ Sales Tax Returns, Annual Bank Statement, Contracts. Agreements entered with the persons to whom such services provided during who Financial Year 2014-15. As no reply was received from the Appellant, the Service Tax was determined on the basis of data/details provided by the Income Tax. department.
 - 3. The above investigation culminated into issuance of a show cause notice dated 18.08.2020 demanding Service Tax and all cess to the tune of 14,92,796/- under Section 73(1) of the Finance Act, 1994 alongwith interest under Section 75 of the Act. It was also proposed to impose penalties under Section 77(1)(a), 78, 77(2) and 77(1)(c) of the Act upon the Appellant.
 - 4. The adjudicating authority vide the impugned order confirmed Service Tax demand of Rs. 14,92,796/- under Section 73(1) along with interest under Section 75 of the Act, imposed penalty of Rs. 14,92,796/- under Section 78 control and penalty of Rs. 50,000/- each under Section 77(1)(a), 77(2) and 77(1)(c) of the Act.
 - 5. Being aggrieved, the Appellant has preferred the present appeal of various grounds as stated below:

The impugned order passed by the adjudicating authority is perverse an:



per *in curium* as he failed to appreciate the facts of the case and provisions of law. The demand is raised for difference in so called taxable value as per service tax returns filed and as per books. The adjudicating authority failed to appreciate that the same was the value of sale of goods which is mentioned in audit report as well as books of account. The adjudicating authority ignored the submission mentioning that the Appellant is engaged in trading activities of good grain.

- (ii) The show cause notice is time barred. There is no suppression of facts, fraud etc. with intend to evade payment of tax by them. The adjudicating authority erred in levying penalties.
- 6. Personal hearing in the matter was held on 21.10.2022. Advocate Bhavesh Purohit appeared for personal hearing and re-iterated the submissions made in the grounds of appeal. He submitted that the assessee is purely a trader selling grains and not providing any sort of services. However, due to a typographical error by the CA of the assessee in the ITR for 2014-15 (AY 2015-16), the revenue from operations under item 1 of the P&L account was mistakenly shown under sale of services, instead of sale of goods. However, item nos. 2 to 52 under the P&L account of the same ITR clearly show their activity as trader and not a service provider. They also are registered under VAT w.e.f. 01-10-2005 as per their registration certification enclosed. However, the lower Adjudicating Authority has overlooked all these facts and has also overlooked the submissions made during the personal hearing and in their written submissions. He submitted that lower Adjudicating Authority has relied upon the fact that they are registered under GST without verifying that their GST registration is in respect of sale of goods and not for services. He requested to allow 10 days time for submission of additional written arguments with supporting documents. Based on the same he requested to drop the Show Cause Notice, set aside the Order-In-Original and allow consequential relief.
- 6.1 The Appellant filed additional written submission on 03.11.2022 wherein they reiterated their grounds of appeal and also submitted copies of invoices, VAT Registration certificate, Income Tax Returns, Form 26AS, Balance Sheet and Profit & Loss accounts.
- 7. I have carefully gone through the case records, Show Cause Notice, impugned order and appeal memorandum filed by the Appellant. The issue to be decided in the case on hand is whether the activity carried out by the Appellant is liable to Service Tax or not.
- 8. I find that the lower Adjudicating Authority has found that in the ITR for the year 2014-15 of the Appellant shared by the Income Tax Department, there



AND

is mention of an amount of Rs. 1,20,77,636/- under the heading of "sale of services". The lower Adjudicating Authority also found that the Appellant has claimed that they have done trading of Wheat, Bajra etc. but they have not submitted any documents viz. purchase bills, sales bills and related documents which could substantiate their claim and therefore, the lower Adjudicating Authority confirmed the demand of service tax on sale of services.

- 9. I find that the Appellant submitted the copy of Tax Audit Report for the financial year 2014-15 (Assessment Year 2015-16) wherein Column 10(a) of Part B of FORM 3CD, the nature of business has been stated as Trading. Further in Trading, Profit & Loss Account for the F.Y. 2014-15 of the Appellant, there is mention of Sales of Rs. 1,20,77,636/ as well as opening stock, purchases and closing stock of the goods. In FORM 3CD, column No. 35(a) pertaining to quantitative details of principal items of goods traded, the Annexure-F has been appended which clearly shows the quantity of purchase and sales of wheat. Bajri, cotton seeds cake, mixdan, wheat bhusu, rice, tuver dal, makkai bhardo panchratna daan, wheat 30 kg, wheat 25 kg, juvar, udad chuni, mung faada bajri 25 kg etc. made by the Appellant.
- 10. I further find that the term 'service' is defined under Section 65(44) of the Act as under:

"Service means any activity carried out by a person for another for consideration, and includes a declared service, but shall not include

- (a) An activity which constitute merely-
- (i) A transfer of title in goods or immovable property, by way of sale, gift or iii any other manner; or
- (ii)....
- (iii)"

Under Section 66B of the Act, service tax shall be levied on the value of all services, other than those service specified in the negative list. Negative list denotes the list of services on which no service tax is payable under Section 66B of the Act. As per Section 66D (e), trading of goods is a service specified under the negative list which is as under:

"SECTION 66D. Negative list of services. -

The negative list shall comprise of the following services, namely :-

- (a)....
- (b)
- (c)
- (d)....
- (e) trading of goods;"

ordingly, on the activity of trading of goods, no service tax is payable.

And we

- 10.1 Section 66B provides that service tax is leviable on all 'services' other than the services specified under the negative list. Therefore, for being subject to service tax an activity needs to qualify as a service first. The term 'service' is defined under Section 65B (44) which specifically excludes an activity of mere transfer of title in goods by way of sale. Thus, the activity of trading which is merely buying and selting of the goods is not a service. Hence, the question of service tax levy on the same does not arise. Accordingly, even if trading activity is not specified under the negative list of services, it is not liable to service tax, as it is not a service. Further, negative list of services comprises services but an activity of trading of goods is not a service, therefore it cannot be specified under the negative list of services.
- 11. In view of discussions and finding, I set aside the impugned order and allow the appeal filed by the Appellant.
- 12. अपीलकर्ता द्वारा दर्ज की गई अपील का निपटारा उपरोक्त तरीके से किया जाता है।
- 12. The appeal filed by Appellant is disposed off as above.

सत्यापित / Attested

||'-1|- \\ (शिव प्रताप सिंह)/(Shiv Pratap Singh)

Superintendent Central GST (Appeals)

Rajkot

आयुक्त (अपील)/Commissioner (Appeals)

By R.P.A.D.

To,

M/s Matva Hanifbhai Isabhai, Opp: Jakat Naka, Bhavnagar Road, Palitana, Bhavnagar, Gujarat. सेवा में,

मे. मतवा हनीफ़भाई ईसाभाई, जकात नाका के सामने, भावनगर रोड, पालिताणा, भावनगर, गुजरात ।

प्रतिलिपि:-

- 1) मुख्य आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, गुजरात क्षेत्र, अहमदाबाद को जानकारी हेत्।
- 2) आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, भावनगर आयुक्तालय, भावनगर को आवश्यक कार्यवाही हेतु।
- अपर आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, भावनगर को आवश्यक कार्यवाही हेतु।
- 4) सहायक आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, भावनगर-1 मण्डल को आवश्यक कार्यवाही हेतु।
- र्5) गार्ड फ़ाइल।

