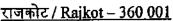


:आयुक्त (अपील्स) का कार्यालय,वस्तु एवं सेवा करऔरकेन्द्रीय उत्पाद शुल्कः: O/O THE COMMISSIONER (APPEALS), GST & CENTRAL EXCISE

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



Tele Fax No. 0281 - 2477952/2441142Email: commrappl3-cexamd@nic.in



DIN20221164SX00000580C9

अपील / फाइलसंख्या/ Appeal /File No. V2/36/BVR/2022

क

B)

मूल आदेश सं / Ö.I.O. No. 125/2021-22

दिनांक/Date 29-03-2022

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

BHV-EXCUS-000-APP-087-2022

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.

अपर आयुक्त/ संयुक्त आयुक्त/ उपायुक्त/ सहायक आयुक्त, केन्द्रीय उत्पाद शुल्क/ सेवाकर/वस्तु एवंसेवाकर,राजकोट / जामनगर / गांधीधाम। द्वारा उपरलिखित जारी मूल आदेश से सृजितः /

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

/ Jamnagar / Gandhidham :

वपीलकर्ता&प्रतिवादी का नाम एवं पता /Name & Address of theAppellant&Respondent :-

Vshwakuni Society Ratanpar, 55 Javswal. Rajeshkumar Rajeshreeben M/s. SurendranagarGujarat

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 शुस्क ,केन्द्रीय उत्पाद शुस्क एवं सवाकर अपीलीय न्यायाधिकरण के प्रांत अपील, केन्द्रीय उत्पाद शुस्क आधानयम,1944 की घारा 35B के अतयत एव वित्त अधिनियम, 1994 की धारा 86 के अंतर्यत निम्नलिखित जगह की जा सकती है ।/ (A)

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:-

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

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.

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

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

अपीसीय न्यायाधिकरण के समक्ष अपील प्रस्तुत करने के लिए केन्द्रीय उत्पाद शुल्क (अपील)नियमावली, 2001, के निवम 6 के अंतर्गत निर्धारित किए गये प्रपत्न हुन 3 के कार प्रतियों में दर्ज किया जाना चाहिए। इनमें से कम से कम एक प्रति के साथ, जहां उत्पाद शुल्क की मौन, ज्याज की मौन और लगाया गया जुर्माना, रुपए 5 लाख या उससे कम,5 लाख रुपए या 50 लाख रुपए युक्त अर्थवा 50 लाख रुपए से अधिक है तो क्रमश: 1,000/- रुपये, 5,000/- रुपये अधिन, क्यां कि की प्रति जमा शुल्क की प्रति संलग्न करें। निर्धारित शुल्क का भगतान, संबंधित अपीलीव न्यायाधिकरण की सहायक सहायक से साथ है। संबंधित अपीलीव न्यायाधिकरण की शाखा रिखत है। स्थान आदेश (स्टे ऑडर) के लिए आवेदन-पत्र के साथ 500/- रुपए का शाखा में होना चाहिए जहां संबंधित अपीलीय न्यायाधिकरण की शाखा रिखत है। स्थान आदेश (स्टे ऑडर) के लिए आवेदन-पत्र के साथ 500/- रुपए का निर्धारित शुल्क जमा करना होगा।/ (iii)

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. 10,000/- where amount of dutydemand/interest/penalty/refund is upto 5 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, वित्त 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 विरुद्ध अपील की गयी हो, उसकी प्रति साथ में संलग्न करें (उनमें से एक प्रति प्रमाणित होनी चाहिए) और इनमें से के में के के में के साथ, जहां सेवाकर की मौग ज्याज की मौग और लगाया गया जुमाना, रुपए 5 लाख या उससे प्रमाणित होनी चाहिए। वाख उपए वा 50 लाख रुपए ते अधिक है तो कमशः 1,000/- रुपये अध्वता 10,000/- रुप

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 of accompanied by a fees of Rs. 1000/- where the amount of service tax & interest demanded & penalty levied is more Rs. 5 Lakhs or less, Rs.5000/- where the amount of service tax & interest demanded of service tax & interest of the least of the service tax interest the amount of service tax & interest of the least of the bench of the least star of the bench of nominated Public Sector Bank of the place where the bench of Tribunal is stated. Application made for grant of stay shall be accompanied by a fee of Rs.500/-.

बित अधिनियम 1994 की धारा 86 की उप-धाराजों (2) एवं (2A) के अंतर्गत दर्ज की गयी अपील, सेवाकर तियमवाली, 1994, के तियम 9(2) एवं 9(2A) के तहत निर्धारित प्रपत्र S.T.-7 में की जा सकेगी एवं उसके साथ अपुक्त, केन्द्रीय उत्पाद बुल्क अथवा आयुक्त (अपील), केन्द्रीय उत्पाद बुल्क विश्व की प्रतिवर्ग सेताय के आयेतन वर्ज करते का निर्वक तेर ने लो अपेत की प्रतिवर्ग सहायक अयुक्त अथवा अपायुक्त, केन्द्रीय उत्पाद बुल्क श्रेष्ठ की प्रतिवर्ग सेताय कर अपीलीय नाशाधिकरण को अपोदत वर्ज करते का निर्वक तेर ने लो अपेत की प्रति ही साथ संस्त्र करनी होगी ।/
The appeal under sub section (2) and (2A) of the section 86 the Finance Act 1994, shall be filed in For ST.7 as prescribed under Rule 9 (2) & 9(2A) of the Service Tax Rules, 1994 and shall be accompanied by a copy of order of Commissioner Central Excise or Commissioner, Central Excise (Appeals) (one of which shall be a certified copy) and copy of the order passed by the Commissionerauthorizing the Assistant Commissioner or Deputy Commissioner of Central Excise/Service Tax to file the appeal before the Appellate Tribunal.

तीमा शुल्क, केन्द्रीय उत्पाद शुल्क एवं सेवाकर वर्गीकीय प्राधिकरण (सेन्टर) के प्रति अपीलों के मामने में केन्द्रीय उत्पाद शुल्क अधितयम 1994 की धारा 33 के अंतर्गत लेशानर को भी मान है महित उत्पाद शुल्क अधितयम 1994 की धारा 33 के अंतर्गत लेशानर को भी महित है हम आयेश के प्रति अपीलीम प्राधिकरण में अपील करते समय उत्पाद शुल्क होवा कर साथ के 10 प्रतिवात (10%), अब मांग एवं जुर्माना विवादित है, या जुर्माना, जब केवल जुर्माना विवादित है, का युग्गता किया जाए, क्ष्मते के स्वाद के संतर्ग कमा के बार्ग को बार्म में कही प्रति प्रति हम सुक्त रापि (11) सेननेट जया की भी मही पत्रत रापि (11) सेननेट जया की भी मही पत्रत रापि (11) सेननेट जया की भी मही पत्रत रापि (11) सेननेट जया की मिन के साय की विवाद रहम (12) सेननेट कर कर के अंतर्गत व्याप के स्वाद कर कर कर स्वाद कर सुक्त कर सुक्त स (i)

(ii)

भारत सरकार कोपनिश्तम आवेदन : Revision application to Government of India: इस आदेश की पुनरीक्षमवानिका निम्निविश्व सामनों में, केंद्रीय उत्पाद शुल्क अभिनियम, 1994 की श्वारा 35EE के प्रथमपूरतुक के अंतर्गतअवर सचिव, भारत सरकार, पुनरीक्षम आवेदन ईकाई, वित्त मंत्रालय, राजस्व विभाग, चौथी मंजिल, जीवन दीप भवन, संसद मार्ग, 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 Delhi-110001, under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to sub-section (1) of Section-35B ibid: (C)

यदि भाल के किसी नुक्षान के मामले में, जहां नुक्सान किसी मान को किसी कारखाने से मंडार मृह के पार्यमन के दौरान या किसी अन्य कारखाने था फिर किसी एक भंडार मृह से दूसरे भंडार मृह भरवमन के दौरान, या किसी मंडार गृह में या भंडारण में भाल के प्रसंस्करण के दौरान, किसी कारखाने या किसी भंडार गृह में मान के नुक्सीन 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)

भारत के बाहर किसी राष्ट्र वा क्षेत्र को निर्याद कर रहे माल के विनिर्माण में प्रयुक्त कड़े माल पर भरी गई केन्द्रीय उत्पाद शुल्क के खुट (रिवेट) के मामले में, जो भारत के बाहर किसी राष्ट्र था क्षेत्र को निर्याद 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 शुरू का भुगतान किए बिना भारत के बाहर, नेपाल या भूटान को 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 भुगतान के लिए जो ड्यूटी केडीट इस अधिनियम एवं इसके विभिन्न प्रान्थानों के तहत मान्य की गई है और ऐसे आदेश जो अवस्त (अपील) के द्वारा वित्त बिधिनियम (न॰ 2),1998 की धारा 109 के द्वारा नियत की गई तारीक्ष अथवा समायाविधि 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. (iv)

उपरोक्त आवेदन की दो प्रतियां प्रपन्न संख्या EA-8 में, जो की केन्द्रीय उत्पादन शुल्क (अपील)निषमावली 2001, के नियम 9 के अंतर्गत विनिर्दिष्ट है, इस अदेश के अपेश्वण के 3 प्राह के अंतर्गत की जानी चाहिए। तथ हो केन्द्रीय उत्पाद शुल्क अधिनियम, 1944 की धारा 35-EE के तहत निर्धारित शुल्क 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 Olo 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-(v)

(vi)

यदि इस अदेश में कई मूल आदेशों का समावेश है तो प्रत्येक मूल आदेश के लिए शुल्क का भुगतान, उपर्युक्त कंग से किया जाना चाहिये। इस तथ्य के होते हुए भी की लिखा पत्नी कार्य से अपने के लिए श्रथा किया पत्नी कार्य से अपने के लिए श्रथा किया जाता है। / In case, if the order covers various umbers of order- in Original, see for each O.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 see of Rs. 100/- for each. (D)

यथासंशोधित न्यायालय शुल्क अधिनियम, 1975, के अनुसूची-। के अनुसार मूल आदेश एवं स्थान कादेश की प्रति पर निर्धारित 6.50 रुपये का न्यायालय शुल्क टिकिट लगा होना चौहिए। / 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)

तीमा शुन्क, केन्द्रीय उत्पाद शुन्क एवं सेवाकर अपीलीय न्यावाधिकरण (कार्य विधि) नियमावली, 1982 में वर्णित एवं अन्य संबन्धित मामलों को सम्मिनित करने वाले नियमों की और भी ध्यान आकर्षित 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 अपीलीय प्राक्षिकारी को अपील दाखिल करने से संबंधित न्यापक, विस्तृत और नवीनतम प्रावधानों के लिए, अपीलार्थी विभागीय वेबसाइट www.cbec.gov.in को देख सकते हैं। / For the elaborate, 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. Rajeshreeben Rajeshkumar Surendranagar (hereinafter referred to as "Appellant") has filed 'Appeal No. V2/36/BVR/2022 against Order-in-Original No. 01/2022-23 dated 01.04.2022 (hereinafter referred to as 'impugned order') passed by the Assistant Commissioner, Central GST Division, Surendranagar (hereinafter referred to as 'adjudicating authority').

- The facts of the case, in brief, are that the Income Tax Department provided data/ details containing various persons i.e. Income Tax Assessee, who declared in their Income Tax Returns for financial year 8: 2016-17 to have 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, 194H, 1941 & 194J of the Income Tax Act, 1961 in respect of various persons which depicted 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 details of the Appellant who had not obtained Service Tax Registration under the Finance Act, 1994 (hereinafter referred to as 'the Act'). The Superintendent, Central GST Division-Surendranagar issued letter dated 24.09.2020 and reminder dated 19.11.2020 to the Appellant calling for the information/ documents for the financial year 2015-16 & 2016-17. Since no reply/ response was given by them, the Service Tax was determined on the basis of data/details provided by the Income Tax department available on records.
- 3. The above investigation culminated into Show Cause Notice dated 21:09:2020 proposing to demand Service Tax of Rs. 10,18,987/- including all cess under Section 73(1) of the erstwhile Finance Act, 1994 (hereinafter referred to as 'the Act') alongwith interest under Section 75 of the Act from the Appellant. It was also proposed to impose penalty under Section 77(1)(a), 77(2), 77 (1)(c) and Section 78 of the Act.
- The adjudicating authority vide the impugned order confirmed Service Tax demand of Rs. 10,18,987/- under Section 73(1) along with interest under Section 75 of the Act and imposed penalties of Rs. 10,000/- each under Section 77(2) and Section 77 (1)(c) of the Act. The penalty of Rs. 10,18,987/- was also imposed upon the Appellant under Section 78 of the Act with benefit of reduced penalty as per proviso to Section 78.
- 5. Being aggrieved, the Appellant has preferred the present appeal on various grounds as stated below:

He is providing bus hiring contract carriage for transportation of



Min

passengers in the name and style of Satyanam Travels. The customers hire his bus for specific purpose i.e. marriage etc. A contract carriage for transportation of passengers, excluding tourism, conducted tour, charter or hire is exempted from the levy of Service Tax vide Notification No. 25/2012-Service Tax dated 20.06.2012, entry Sr. No. 23.

- (ii) As per Section 66D(o) service of transportation of passengers, with or without accompanied belongings, by a stage carriage is not a service. He is providing letting out the bus owned by him on rental basis to the customers which falls under negative list of services under Section 66D(o) of the Act.
- (iii) The demand is time barred.
- (iv) The impugned order is bad in law without considering the Notification No. 26/2012 Sr. No. 11 allowing 90% abatement of total receipt.
- 6. Personal hearing in the matter was held on 21.10.2022. Shri P. D. Raval, Advocate appeared for personal hearing in respect of 4 appeals nos. 34, 35, 36 & 37/BVR/2022 filed by M/s. Rajeshkumar Chunilal Jayswal (Satyanam Travels). He reiterated the submissions made in the appeals. He submitted that the appellant is merely providing buses on rent for occasions such as marriages etc. Their activity is exempted from Service Tax under the mega exemption referred by them. He, therefore, requested to drop the proceedings by setting aside the Order-In-Original and allowing consequential relief.
- 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 that whether the Appellant is liable to pay service tax on activity carried out by them or not.
- 8. I find that the Appellant is providing bus hiring contract carriage for transportation of passengers in the name and style of Satyanam Travels. After introduction of negative list regime with effect from 01.07.2022 as contained in Section 66D of the Act, all the services are taxable except those mentioned in negative list or mentioned in mega exemption Notification No. 25/2012.
- 9. It is the contention of the Appellant that their services are covered under the negative list which is re-produced below:

"SECTION 66D. Negative list of services.-

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

- (o) service of transportation of passengers, with or without accompanied belongings, by—
- (i) a stage carriage
- (ii) railways in a class other than—
- (A) first class; or
- (B) an air-conditioned coach;



Airy

- (iii) metro, monorail or tramway,
- (iv) Inland waterways;

st kkinist i

- (v) public transport, other than predominantly for tourism purpose, in a vessel between places located in India; and
- (vi) metered cabs or auto rickshaws"

Stage carriage means a motor vehicle carrying or adapted to carry more than six persons excluding the driver which carries passengers for hire or reward at separate fares paid by or for individual passengers, either for the whole journey or for stages of the journey.

On going through the wordings applied, it is clear that the services carried out by the Appellant is not covered under transportation of passengers by a stage carriage since on verification of PERMIT issued by the R.T.O., Surendranagar, the same is a 'contract carriage permit' and not stage carriage permit. Therefore, the contention of the Appellant is not correct and I discard the same.

- 10. The Adjudicating Authority held that the services provided by the Appellant is of "Tour Operator" and hence, services provided does not falls under mega exemption Notification 25/2012-Service Tax (entry no. 23). The contention of the Appellant is that their services are exempted by way of Notification No. 25/2012-Service Tax dated 20.06.2012 at entry serial number 23. For sake of reference, the same is re-produced below:
 - "23. Transport of passengers, with or without accompanied belongings, by -
 - (a) air, embarking from ar terminating in an airport located in the state of Arunachal Pradesh, Assam, Manipur, Meghalaya, Mizoram, Nagaland, Sikkim, or Tripura or at Bagdogra located in West Bengal;
 - (b) non-air conditioned contract carriage other than radio taxi, for the transportation of passengers, excluding tourism, conducted tour, charter or hire;"

As per Section 2(7) of the Motor Vehicle Act, 1988 the "contract carriage" means a motor vehicle which carries a passenger or passengers for hire or reward and is engaged under a contract, whether expressed or implied, for the use of such vehicle as a whole for the carriage of passengers mentioned therein and entered into by a person with a holder of a permit in relation to such vehicle or any person authorised by him in this behalf on a fixed or an agreed rate or sum—

- (a) on a time basis, whether or not with reference to any route or distance; or
- (b) from one point to another, and in either case, without stopping to pick up or set down passengers not included in the contract anywhere during the journey, and includes— •
- (i) a maxicab; and
- (ii) a motorcab notwithstanding the separate fares are charged for its passengers;

I find that the bus owned by the Appellant is registered as a contract carriage with the regional road transport office, Surendranagar. A contract carriage means a motor vehicle which carries passengers for hire or reward and is engaged under a contract whether expressed or implied, for the use of such vehicle as a whole for the carriage of passengers mentioned therein and entered into by a person with a holder of a permit in relation to such vehicle or any

Birg

person authorised by him in this behalf on a fixed or an agreed rate or sum (a) on a time basis, whether or not with reference to any route or distance; or (b) from one point to another, and in either case, without stopping to pick up or set down passengers not included in the contract anywhere during the journey. Here, the Appellant supplied his bus on a time basis with reference to any rout or distance for purpose of marriage etc. Therefore, the Appellant is falling under the ambit of Sr. No. 23(b) of the Notification 25/2012-Service Tax dated 20.06.2012 and the service rendered by him is exempted from purview of Service Tax.

- 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.

Bright

सत्यापित / Attested

Superintendent Central GST (Appeals (शिव प्रताप सिंह)/(Shiv Pratap Singh),

Central GST (Appeals) आयुक्त (अपील)/Commissioner (Appeals)

By R.P.A.D.

Rajkot

To,

M/s. Rajeshreeben Rajeshkumar Jayswal, 55, Vishwakunj Society, Ratanpar, Surendranagar. सेवा में,

मे. राजेश्रीबेन राजेशकुमार जायसवाल, 55, विश्वकुंज सोसायटी, रतनपर, सुरेन्द्रनगर।

प्रतिलिपि:-

- 1) मुख्य आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, गुजरात क्षेत्र, अहमदाबाट को जानकारी हेत्।
- 2) आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, भावनगर आयुक्तालय, भावनगर को आवश्यक कार्यवाही हेतु।
- 3) अपर/सयुंक्त 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, सुरेन्द्रनगर मण्डल को आवश्यक कार्यवाही हेतु।

िंह) गार्ड फ़ाइल।

THE STATE OF THE S

COPY Recirced

Pinal. Renal

2022

Parocase 29-11-2022