



आयुक्त(अपील) का कार्यालय,
Office of the Commissioner (Appeal),
केंद्रीय जीएसटी, अपील आयुक्तालय, अहमदाबाद
Central GST, Appeal Commissionerate, Ahmedabad
जीएसटी भवन, राजस्वमार्ग, अम्बावाड़ी अहमदाबाद - ३८००१५.
CGST Bhavan, Revenue Marg, Ambawadi, Ahmedabad - 380015
07926305065- टेलीफैक्स - 07926305136



DIN: 20230564SW000000F749

स्पीड पोस्ट

- क फाइल संख्या : File No : GAPPL/COM/STP/2622/2022-APPEAL /1692-96
- ख अपील आदेश संख्या Order-In-Appeal Nos.AHM-EXCUS-003-APP-023/2023-24
दिनांक Date : 15-05-2023 जारी करने की तारीख Date of Issue 16.05.2023
आयुक्त (अपील) द्वारा पारित
Passed by Shri Akhilesh Kumar, Commissioner (Appeals)
- ग Arising out of Order-in-Original No. 89/AC/DEM/MEH/ST/Radhe/2021-22, dated 19.03.2022, passed by the Assistant Commissioner, CGST & C.Ex., Division: Mehsana, Commissionerate: Gandhinagar.
- घ अपीलकर्ता का नाम एवं पता Name & Address

1. Appellant

M/s. Radhe Developers,
Plot No. 18, R V Homes,
Village : Vijapur, Tal: Vijapur,
Distt : Mehsana, PIN- 382870.

2. Respondent

The Deputy/Assistant Commissioner, CGST, Division-Mehsana, Sardar Patel Vypar Sankul, Malgodown Road, Mehsana-384002.

कोई व्यक्ति इस अपील आदेश से असंतोष अनुभव करता है तो वह इस आदेश के प्रति यथार्थिथि नीचे बताए गए सक्षम अधिकारी को अपील या पुनरीक्षण आवेदन प्रस्तुत कर सकता है।

Any person aggrieved by this Order-In-Appeal may file an appeal or revision application, as the one may be against such order, to the appropriate authority in the following way:

भारत सरकार का पुनरीक्षण आवेदन :

Revision application to Government of India :

(1) केन्द्रीय उत्पादन शुल्क अधिनियम, 1994 की धारा अतत नीचे बताए गए मामलों के बारे में पूर्वोक्त धारा को उप-धारा के प्रथम परन्तु क के अंतर्गत पुनरीक्षण आवेदन अधीन सचिव, भारत सरकार, वित्त मंत्रालय, राजस्व विभाग, चौथी मंजिल, जीवन दीप भवन, संसद मार्ग, नई दिल्ली: 110001 को की जानी चाहिए।

(i) A revision application lies to the Under Secretary, to the Govt. of India, Revision Application Unit Ministry of Finance, Department of Revenue, 4th Floor, Jeevan Deep Building, Parliament Street, New Delhi - 110 001 under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to sub-section (1) of Section-35 ibid :

(ii) यदि माल की हानि के मामले में जब ऐसी हानि कारखाने से किसी भण्डागार या अन्य कारखाने में या किसी भण्डागार से दूसरे भण्डागार में माल ले जाते हुए मार्ग में, या किसी भण्डागार या भण्डार में चाहे वह किसी कारखाने में या किसी भण्डागार में हो माल की प्रक्रिया के दौरान हुई हो।

(ii) In case of any loss of goods where the loss occur 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.



(क) भारत के बाहर किसी राष्ट्र या प्रदेश में निर्यातित माल पर या माल के विनिर्माण में उपयोग शुल्क कच्चे माल पर उत्पादन शुल्क के रिबेट के मामलों में जो भारत के बाहर किसी राष्ट्र या प्रदेश में निर्यातित है।

(A) 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.

(ख) यदि शुल्क का भुगतान किए बिना भारत के बाहर (नेपाल या भूटान को) निर्यात किया गया माल हो।

(B) In case of goods exported outside India export to Nepal or Bhutan, without payment of duty.

अंतिम उत्पादन की उत्पादन शुल्क के भुगतान के लिए जो ड्यूटी क्रेडिट मान्य की गई है और ऐसे आदेश जो इस धारा एवं नियम के मुताबिक आयुक्त, अपील के द्वारा पारित वो समय पर या बाद में वित्त अधिनियम (नं.2) 1998 धारा 109 द्वारा नियुक्त किए गए हो।

(c) 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 and such order is passed by the Commissioner (Appeals) on or after, the date appointed under Sec.109 of the Finance (No.2) Act, 1998.

(1) केन्द्रीय उत्पादन शुल्क (अपील) नियमावली, 2001 के नियम 9 के अंतर्गत विनिर्दिष्ट प्रपत्र संख्या ईए-8 में दो प्रतियों में, प्रेषित आदेश के प्रति आदेश प्रेषित दिनोंक से तीन मास के भीतर मूल-आदेश एवं अपील आदेश की दो-दो प्रतियों के साथ उचित आवेदन किया जाना चाहिए। उसके साथ खाता इ. का मुख्यशीर्ष के अंतर्गत धारा 35-इ में निर्धारित फी के भुगतान के सबूत के साथ टीआर-6 चालान की प्रति भी होनी 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.

(2) रिविजन आवेदन के साथ जहाँ संलग्न रकम एक लाख रुपये या उससे कम हो तो रुपये 200/- फीस भुगतान की जाए और जहाँ संलग्न रकम एक लाख से ज्यादा हो तो 1000/- की फीस भुगतान की जाए।

The revision application shall be accompanied by a fee of Rs.200/- where the amount involved is Rupees One Lac or less and Rs.1,000/- where the amount involved is more than Rupees One Lac.

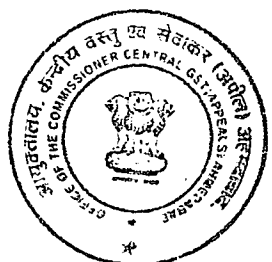
सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण के प्रति अपील:-
Appeal to Custom, Excise, & Service Tax Appellate Tribunal.

(1) केन्द्रीय उत्पादन शुल्क अधिनियम, 1944 की धारा 35-बी/35-इ के अंतर्गत:-

Under Section 35B/ 35E of CEA, 1944 an appeal lies to :-

(क) उक्तलिखित परिच्छेद 2 (1) क में बताए अनुसार के अलावा की अपील, अपीलो के मामले में सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण (सिस्टेट) की पश्चिम क्षेत्रीय पीठिका, अहमदाबाद में 2nd माला, बहुमाली भवन, असरवा, गिरधरनागर, अहमदाबाद -380004

(a) To the west regional bench of Customs, Excise & Service Tax Appellate Tribunal (CESTAT) at 2nd floor, Bahumali Bhawan, Asarwa, Girdhar Nagar, Ahmedabad : 380004. in case of appeals other than as mentioned in para-2(i) (a) above.



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.5,000/- and Rs.10,000/- where amount of duty / penalty / demand / 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 Asstt. Registrar of a branch of any nominate public sector bank of the place where the bench of any nominate public sector bank of the place where the bench of the Tribunal is situated.

- (3) यदि इस आदेश में कई मूल आदेशों का समावेश होता है तो प्रत्येक मूल आदेश के लिए फीस का भुगतान उपर्युक्त ढंग से किया जाना चाहिए इस तथ्य के होते हुए भी कि लिखा पढी कार्य से बचने के लिए यथास्थिति अपीलीय न्यायाधिकरण को एक अपील या केन्द्रीय सरकार को एक आवेदन किया जाता है।

In case of the order covers a number of order-in-Original, fee 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 lacs fee of Rs.100/- for each.

- (4) न्यायालय शुल्क अधिनियम 1970 यथा संशोधित की अनुसूचि-1 के अंतर्गत निर्धारित किए अनुसार उक्त आवेदन या मूल आदेश यथास्थिति निर्णयन प्राधिकारी के आदेश में से प्रत्येक की एक प्रति पर रु.6.50 पैसे का न्यायालय शुल्क टिकट लगा होना चाहिए।

One copy of application or O.I.O. as the case may be, and the order of the adjournment authority shall a court fee stamp of Rs.6.50 paise as prescribed under scheduled-I item of the court fee Act, 1975 as amended.

- (5) इन ओर संबंधित मामलों को नियंत्रण करने वाले नियमों की ओर भी ध्यान आकर्षित किया जाता है जो सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण (कार्याविधि) नियम, 1982 में निहित हैं।

Attention is invited to the rules covering these and other related matter contended in the Customs, Excise & Service Tax Appellate Tribunal (Procedure) Rules, 1982.

- (7) सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण (सिस्टेट), के प्रति अपील के मामले में कर्तव्य मांग (Demand) एवं दंड (Penalty) का 10% पूर्व जमा करना अनिवार्य है। हालांकि, अधिकतम पूर्व जमा 10 करोड़ रुपए है। (Section 35 F of the Central Excise Act, 1944, Section 83 & Section 86 of the Finance Act, 1994)

केन्द्रीय उत्पाद शुल्क और सेवा कर के अंतर्गत, शामिल होगा "कर्तव्य की मांग"(Duty Demanded) -

- (Section) खंड 11D के तहत निर्धारित राशि;
- लिया गलत सेनवैट क्रेडिट की राशि;
- सेनवैट क्रेडिट नियमों के नियम 6 के तहत देय राशि.

⇒ यह पूर्व जमा 'लंबित अपील' में पहले पूर्व जमा की तुलना में, अपील दाखिल करने के लिए पूर्व शर्त बना दिया गया है.

For an appeal to be filed before the CESTAT, 10% of the Duty & Penalty confirmed by the Appellate Commissioner would have to be pre-deposited, provided that the pre-deposit amount shall not exceed Rs.10 Crores. It may be noted that the pre-deposit is a mandatory condition for filing appeal before CESTAT. (Section 35 C (2A) and 35 F of the Central Excise Act, 1944, Section 83 & Section 86 of the Finance Act, 1994)

Under Central Excise and Service Tax, "Duty demanded" shall include:

- amount determined under Section 11 D;
- amount of erroneous Cenvat Credit taken;
- amount payable under Rule 6 of the Cenvat Credit Rules.

इस आदेश के प्रति अपील प्राधिकरण के समक्ष जहाँ शुल्क अथवा शुल्क या दण्ड विवादित हो तो मांग किए गए शुल्क का 10% भुगतान पर और जहाँ केवल दण्ड विवादित हो तब दण्ड के 10% भुगतान पर की जा सकती है।

In view of above, an appeal against this order shall lie before the Tribunal on payment of 10% of the duty demanded where duty or duty and penalty are in dispute, or penalty where penalty alone is in dispute."



अपीलिय आदेश / ORDER-IN-APPEAL

The present appeal has been filed by M/s. Radhe Developers, Plot No. 18, R V Homes, Village : Vijapur, Tal: Vijapur, Distt : Mehsana , PIN- 382870 (hereinafter referred to as the "appellant") against Order-In-Original No. 89/AC/DEM/MEH/ST/Radhe/2021-22, dated 19.03.2022 [hereinafter referred to as the "impugned order"], passed by the Assistant Commissioner, CGST & C.Ex., Division: Mehsana, Commissionerate: Gandhinagar [hereinafter referred to as the "adjudicating authority"].

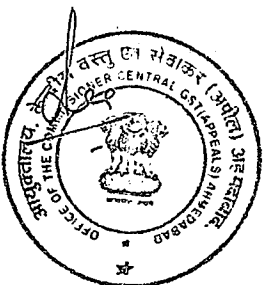
2. Briefly stated, the facts of the case are that the appellant were holding Service Tax Registration No. AAQFR7684HSD001 for providing taxable services. As per the information received from the Income Tax department, discrepancies were observed in the total income declared in Income Tax Returns/26AS, when compared with Service Tax Returns of the appellant for the period F.Y. 2016-17. In order to verify the said discrepancies as well as to ascertain the fact whether the appellant had discharged their Service Tax liabilities during the period F.Y. 2016-17, letters dated 24.06.2020 and 02.07.2020 were issued to them by the department. The appellant failed to file any reply to the query. It was also observed by the Service Tax authorities that the appellant had not declared actual taxable value in their Service Tax Returns for the relevant period. It was also observed that the nature of service provided by the appellant were covered under the definition of 'Service' as per Section 65 B(44) of the Finance Act, 1994 ; and their services were not covered under the 'Negative List' as per Section 66D of the Finance Act, 1994, nor were they exempted vide the Mega Exemption Notification No. 25/2012-S.T., dated 20.06.2012 (as amended). Hence, the services provided by the appellant during the relevant period were considered taxable.

3. In the absence of any other available data for cross-verification, the Service Tax liability of the appellant for the F.Y. 2016-17 was determined on the basis of value of difference between 'Sales of Services under Sales/Gross Receipts from Services (Value from ITR)' as provided by the Income Tax department and the 'Taxable Value' shown in the Service Tax Returns for the relevant period as per details below:

TABLE

(Amount in Rs.)

Period	Differential Taxable Value as per Income Tax Data	Rate of Service Tax [Including Cess]	Demand of Service Tax
	(1)	(2)	(3)
2016-17	68,69,000	15 %	10,30,350



4. The appellant were issued a Show Cause Notice vide F.No. V.ST/11A-208/ Radhe Developers/2020-12, dated 18.08.2020, wherein it was proposed to:

- Demand and recover Service Tax amounting to Rs. 10,30,350/- under the proviso to Section 73 (1) of the Finance Act, 1994 along with Interest under Section 75 of the Finance Act, 1994 ;
- Impose penalty under Section 77(2), 77(C) and 78 of the Finance Act, 1994;

5. The said Show Cause Notice was adjudicated, ex-parte, vide the impugned order wherein:

- Demand of Service Tax amount of Rs. 10,30,350/- was confirmed under Section 73 of the Finance Act, 1994.
- Interest was imposed to be recovered under section 75 of the Finance Act, 1994.
- Penalty amounting to Rs. 10,30,350/- was imposed under Section 78 of the Finance Act, 1994;
- Penalty of @ Rs. 200/- per day till the compliance or Rs. 10,000/-, whichever is higher, was also imposed under Section 77C of the Finance Act, 1994 ;
- Penalty of Rs. 10,000/- was also imposed under Section 77(2) of the Finance Act, 1994.
- Option was given for reduced penalty vide clause (ii) of the second proviso to Section 78(1) of the Finance Act, 1994.

6. Being aggrieved with the impugned order passed by the adjudicating authority, the appellant have preferred the present appeal on merit along with application for condonation of delay on following grounds:-

- He was suffering from acute gastritis, vomiting, fever and headache and was undergoing treatment with complete rest as no food was staying in stomach and experiencing weakness. He submitted a copy of the medical certificate issued by the medical practitioner. He contended that due to the health problem they could not file the appeal within the due time.
- They are a registered dealer duly involved in the activity of builder and developers. They constructed a scheme of small or medium size Bungalows at Vijapur especially for SC/ST persons with reasonable cost and with the social responsibility in mind.
- They got timely registration and paid tax and also filed service tax returns.
- In service tax, the tax was to be paid on receipt basis. So they paid Service Tax on collection basis say receipt of booking. They paid all taxes after claiming the



exemption of 75% or 70% of receipt of revenue as it was abatement allowed to builders and developers.

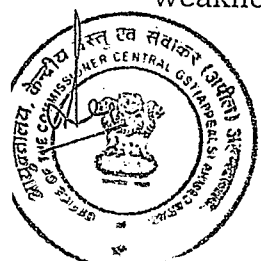
- No notice was received by them ever before the receipt of the OIO.
- Department might have served the notices at the address duly registered with the department. But as the scheme was finished nobody was present there so the whole matter was not at all brought to the knowledge of the appellant.
- The OIO was served by making call on the partner Mr. Ajit Parmar.
- The Learned Adjudicating Officer has not given the basic abatement while calculating the Service Tax in the OIO.
- The Adjudicating Officer has not applied the mind and just done the order to finish the formalities.

7. At the first and foremost, while dealing with the issue of condonation of delay, it is observed that the appellant, in their application for condonation of delay, have submitted the reasons for the delay in filing the appeal that he was suffering from acute gastritis, vomiting, fever and headache and was undergoing treatment with complete rest as no food was staying in stomach and experiencing weakness. He submitted a copy of the medical certificate issued by the medical practitioner. He contended that due to the health problem they could not file the appeal within the due time.

7.1. It is observed from the records that the present appeal was filed by the appellant on 15.07.2022 against the impugned order dated 22.03.2022, which the appellant claimed to have received on 21.04.2022. Thus, there is a delay of twenty four (24) days in filing the present appeal beyond the prescribed time limit of two months as per the provisions of Section 85 of the Finance Act, 1994.

7.2 In terms of Section 85 of the Finance Act, 1994, an appeal before the Commissioner (Appeals) is to be filed within a period of two months from the receipt of the order being appealed. Further, the proviso to Section 85 (3A) of the Finance Act, 1994 allows the Commissioner (Appeals) to condone delay and allow a further period of one month, beyond the two month allowed for filing of appeal in terms of Section 85 (3A) of the Finance Act, 1994, if he is satisfied that the appellant was prevented by sufficient cause from presenting the appeal within the aforesaid period of two months.

7.3 On going through the submissions, I find that the appellant have claimed that was suffering from acute gastritis, vomiting, fever and headache and was undergoing treatment with complete rest as no food was staying in stomach and experiencing weakness. He submitted a copy of the medical certificate issued by the medical



practitioner. Therefore, delay of 24 days occurred in filing the present appeal. I find that the reason for the delay stated by the appellant is genuine and acceptable. Therefore, I am inclined to consider the request of the appellant for condonation of delay and treat the appeal to be filed within time-limit.

8. Further, it is observed that the appellant is contesting the demand of Service Tax alongwith Interest & also imposition of penalty totally amounting to Rs. 20,80,700/- [i.e. Service Tax Rs. 10,30,350/- , Penalty Rs. 10,30,350/- , Rs. 10,000/- & Rs. 10,000/-] confirmed / imposed under Section 73(1), Section 78, Section 77(2) and Section 77C of the Finance Act, 1994 , respectively. Upon scrutiny of the appeal papers filed by the appellant on 15.07.2022, it was noticed that they had submitted DRC-03 dated 02.07.2022 showing payment of Rs. 77,277/- towards pre-deposit in terms of Section 35F of the Central Excise Act, 1944.

9. The CBIC had, consequent to the rollout of the Integrated CBIC-GST Portal, vide Circular No. 1070/3/2019-CX, dated 24.06.2019, directed that from 1st July, 2019 onwards, a new revised procedure has to be followed by the taxpayers for making arrears of Central Excise & Service Tax payments through portal "CBIC (ICEGATE) E-payment". Subsequently, the CBIC issued Instruction dated 28.10.2022 from F.No. CBIC-240137/14/2022-Service Tax Section-CBEC, wherein it was instructed that the payments made through DRC-03 under CGST regime is not a valid mode of payment for making pre-deposits under Section 35F of the Central Excise Act, 1944 and Section 83 of the Finance Act, 1994.

10. In terms of Section 35F of the Central Excise Act, 1944, an appeal shall not be entertained unless the appellant deposits 7.5% of the duty in case where duty and penalty are in dispute or 7.5% of penalty where such penalty is in dispute. Relevant legal provisions are reproduced below:-

"SECTION 35F: Deposit of certain percentage of duty demanded or penalty imposed before filing appeal. — The Tribunal or the Commissioner (Appeals), as the case may be, shall not entertain any appeal —

(i) under sub-section (1) of section 35, unless the appellant has deposited seven and a half per cent. of the duty, in case where duty or duty and penalty are in dispute, or penalty, where such penalty is in dispute, in pursuance of a decision or an order passed by an officer of Central Excise lower in rank than the [Principal Commissioner of Central Excise or Commissioner of Central Excise];"

11. The appellant was, therefore, called upon vide letter F.No. GAPPL/COM/STP/2622/2022-APPEAL, dated 22.12.2022 to make the pre-deposit in terms of Board's



Circular No. 1070/3/2019-CX, dated 24.06.2019 read with CBIC Instruction dated 28.10.2022 and submit the document evidencing payment within 10 days of the receipt of this letter. They were also informed that failure to submit proof of pre-deposit would result in dismissal of the appeal for non-compliance in terms of Section 35F of the Central Excise Act, 1944. A reminder letter F.No. GAPPL/COM/STP/2622/2022-APPEAL, dated 16.02.2023, followed by another reminder through email dated 22.03.2023 were also issued to the appellant to make the pre-deposit and to submit the document evidencing payment of pre-deposit immediately on receipt of the letter/email.

12. However, no communication was received from the appellant, nor did they submit evidence of pre-deposit in terms of Board's Circular No. 1070/3/2019-CX, dated 24.06.2019. It is observed that though sufficient time was granted to the appellant to make the payment of pre-deposit in terms of Circular No. 1070/3/2019-CX, dated 24.06.2019, they have failed to furnish proof of revised payment of pre-deposit of 7.5% of the duty/ Tax made in terms of CBIC Instruction dated 28.10.2022 issued from F.No. CBIC-240137/14/2022-Service Tax Section - CBEC.

13. I find it relevant to mention that the Instruction dated 28.10.2022 was issued by the CBIC consequent to the directions of the Hon'ble Bombay High Court in the case of Sodexo India Services Pvt. Ltd. Vs. UOI and Ors. in Writ Petition No. 6220 of 2022, which is reproduced below :

"8 Therefore, it does appear that the confusion seems to be due to there being no proper legal provision to accept payment of pre-deposit under Section 35F of the Central Excise Act, 1944 through DRC-03. Some appellants are filing appeals after making pre-deposit payments through DRC-30/GSTR-3B. In our view, this has very wide ramifications and certainly requires the CBI & C to step in and issue suitable clarifications/guidelines/ answers to the FAQs. We would expect CBI & C to take immediate action since the issue has been escalated by Mr.Lal over eight months ago."

14. In terms of CBIC's Instruction dated 28.10.2022, I find that the payment made vide DRC-03/ GST Challan cannot be considered as valid payment of pre-deposit. In terms of Section 35F of the Central Excise Act, 1944, the Tribunal or Commissioner (Appeals), as the case may be, shall not entertain any appeal unless the appellant has deposited 7.5% of the duty, in case where duty or duty and penalty are in dispute. These provisions have been made applicable to appeals under Section 85 of the Finance Act, 1994. Hence, this authority is bound by the provisions of the Act and has no powers or jurisdiction to interpret the mandate of Section 35F in any other manner. As such, I hold that for entertaining the appeal, the appellant is required to



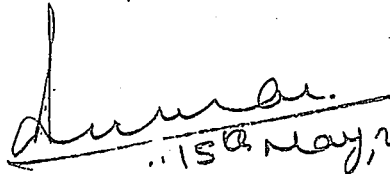
F No. GAPPL/COM/STP/2622/2022-APPEAL

deposit the amounts in terms of Section 35F, which was not done. I, therefore, dismiss the appeal filed by the appellant for non-compliance of the provisions of Section 35F of the Central Excise Act, 1944.

15. In view of the above, the appeal filed by the appellant is dismissed for non-compliance of the provisions of Section 35F of the Central Excise Act, 1944 as made applicable to Service Tax vide Sub-section (5) of Section 85 of the Finance Act, 1994 and also as being barred by limitation.

16. अपीलकर्ता द्वारा दर्ज की गई अपील का निपटारा उपरोक्त तरीके से किया जाता है।

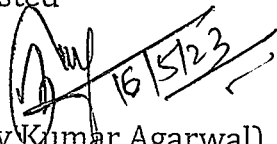
The appeal filed by the *appellant* stands disposed of in above terms.


(Akhilesh Kumar)
Commissioner (Appeals)

Date: 15.05.2023



Attested


(Ajay Kumar Agarwal)
Assistant Commissioner [In-situ] (Appeals)
Central Tax, Ahmedabad.

BY RPAD / SPEED POST

To,
M/s. Radhe Developers,
Plot No. 18, R V Homes,
Village: Vijapur, Tal: Vijapur,
Distt : Mehsana, PIN- 382870

Copy to: -

1. The Principal Chief Commissioner, CGST & C.Ex., Ahmedabad Zone.
2. The Principal Commissioner, CGST & C.Ex., Commissionerate: Gandhinagar.
3. The Assistant Commissioner, CGST & C.Ex., Division- Mehsana, Commissionerate: Gandhinagar.
4. The Superintendent (System), CGST, Appeals, Ahmedabad. (for uploading the OIA).
5. Guard File.
6. P.A. File.

