

BEFORE THE NATIONAL ANTI-PROFITEERING AUTHORITY
UNDER THE CENTRAL GOODS & SERVICES TAX ACT, 2017

Case No. 52/2022
Date of Institution 27.11.2020
Date of Order 29.07.2022

In the matter of:

1. Shri Nilang Shastri, A-801, Swati Florence, Nr. SOBO Centre, South Bopal, Ahmedabad, Gujarat-380058.
2. Director General of Anti-Profiteering, Central Board of Indirect Taxes & Customs, 2nd Floor, Bhai Vir Singh Sahitya Sadan, Bhai Vir Singh Marg, Gole Market, New Delhi-110001.

Applicants

Versus



M/s Swati Realty, 11th Floor, Signature-1, Nr. Divya Bhaskar, Opp. Andaz Party Plot, Makarba, S.G. Highway, Ahmedabad, Gujarat- 380051.

Respondent

Quorum:-

1. Sh. Amand Shah, Chairman & Technical Member.
2. Sh. Pramod Kumar Singh, Technical Member.
3. Sh. Hitesh Shah, Technical Member.

Present:-

1. Sh. Nilang Shastri, Applicant No. 1 in person.
2. Sh. Sanket Garg, Chartered Accountant for the Respondent.
3. Sh. Lal Bahadur, Assistant Commissioner for the DGAP.

ORDER



1. The Present Report dated 27.11.2020 had been furnished by the Applicant No. 2 i.e. the Director General of Anti-Profiteering (DGAP), under Rule 129 (6) of the Central Goods & Services Tax (CGST) Rules, 2017. The brief facts of the present case was that a reference was received from the Standing Committee on Anti-Profiteering on 17.07.2020 to the DGAP for conducting a detailed investigation in respect of an application filed by the Applicant No. 1 alleging profiteering by the Respondent in respect of purchase of a Flat in the Respondent's project "Swati Florence", Ahmedabad, Gujarat. The Applicant No. 1 has alleged that the Respondent had not passed on the benefit of ITC to him by way of commensurate reduction in price after the implementation of GST w.e.f. 01.07.2017.

2. The DGAP has stated that receipt of the reference from the Standing Committee on Anti-profiteering, a notice under Rule 129 of the Rules was issued on 04.08.2020, calling upon the Respondent to reply as to whether he admitted that the benefit of ITC had not been passed on to the Applicant No. 1 by way of commensurate reduction in price and if so, to suo-moto determine the quantum thereof and indicate the same in his reply to the notice as well as furnish all supporting documents. Further, in terms of the said notice dated 04.08.2020, the Respondent was also given an opportunity to inspect the non-confidential evidences/information between 18.08.2020 to 20.08.2020. However, the Respondent did not avail of the said opportunity.
3. The DGAP has submitted that vide e-mail dated 08.10.2020, the Applicant No. 1 was given an opportunity to inspect the non-confidential documents/reply furnished by the Respondent on 14.10.2020 to 16.10.2020, which the Applicant No. 1 did not avail of.
4. The DGAP has mentioned that the period covered by the current investigation was July, 2017 to July, 2020 and that the time limit to complete the investigation was upto 16.01.2021.
5. The DGAP has reported that the Respondent submitted his replies to the said notice, vide letters and e-mails dated 26.08.2020, 07.09.2020, 03.10.2020, 07.10.2020, 15.10.2020

06.11.2020 and 24.11.2020. Vide the aforementioned letters/e-mails, the Respondent submitted:

- i) That he was engaged in the business of construction of residential complexes.
- ii) That he had units which was allotted/ acquired under Credit Linked Subsidy Scheme.
- iii) That he had executed project "Swati Florence" in firm Swati Realty, situated at South Bopal, Ahmedabad. Out of total 265 units in the project, 217 units were booked before receipt of Occupation Certificate (OC) and 48 units were booked after receipt of OC.
- iv) That he had already passed on the benefit of ITC to all 217 customers including the Applicant @2.80% for the Advances received during the period 01.07.2017 to 31.03.2019 by mode of banker's cheque and it had been communicated via email. However, the Applicant had not accepted the same.

6. Vide the aforementioned letters/e-mails, the Respondent submitted the following documents/information:-

- (a) Copies of GSTR-1 returns for July, 2017 to July, 2020.
- (b) Copies of GSTR-3B returns for July, 2017 to July, 2020.
- (c) GSTR-9 returns for the period July, 2017 to March, 2018.

- (d) Copy of Tran-1.
- (e) Copies of VAT& ST-3 returns for April, 2016 to June, 2017.
- (f) Electronic Credit ledger for the period July, 2017 to July, 2020.
- (g) Copies of receipt vouchers and sale agreement in the name of the Applicant.
- (h) Details of applicable tax rates- pre-GST and post-GST.
- (i) Copy of Balance Sheet (including all Annexures and profit/ loss account) and Income Tax Audit Report for FY 2016-17, 2017-18 and 2018-19.
- (j) Copy of Project Report submitted to the RERA including all periodic progress report.
- (k) Status of the project "Swati Florence", as on 31.07.2020 in terms of sold and unsold units along with copy of OC.
- (l) CENVAT/ ITC register for the FY 2016-17, 2017-18, 2018-19, 2019-20 and 2020-21 (upto July, 2020), reconciled with VAT, ST-3 and GSTR-3B returns.
- (m) Details of VAT, Service Tax, ITC of VAT, CENVAT credit for the period April, 2016 to June, 2017 and output GST and ITC of GST for the period July, 2017 to July, 2020 for the project "Swati Florence" along with documentary evidence.
- (n) Details/ List of home buyers of the project "Swati Florence".

7. The DGAP has also stated that the subject application, the various replies of the Respondent and the documents/evidences on record had been carefully examined. The main issues for determination were:

- i) Whether there was benefit of reduction in rate of tax or input tax credit on the supply of construction service by the Respondent after the introduction of GST w.e.f. 01.07.2017 and if so,
- ii) Whether such benefit was passed on to the recipients in terms of Section 171 of the Central Goods and Services Tax Act, 2017.

8. The DGAP has also mentioned that the Respondent vide letter dated 07.09.2020, submitted copy of OC dated 28.09.2018, wherein it had been mentioned that the impugned project was Residential Affordable Housing. The Respondent vide reply dated 24.11.2020 submitted that he had sold 24 units under Credit Linked Subsidy Scheme (CLSS) in the FY 2019-20 and 2020-21. The Respondent had also submitted the copies of Certificate issued by the banks to the home buyers, evincing payment of subsidy under CLSS Scheme of Government of India.

9. The DGAP has submitted that the Government of Gujarat, Urban Development and Urban Housing Department, vide Resolution No. AFH/102013/808/Th-I dated 15.01.2014 had specified parameters for affordable housing, which was stated as:-

Parameter	EWS	LIG-1	LIG-2	MIG-1
Carpet area (Sq. mtr.)	25-30	31-40	41-50	51-85
Maximum selling price per unit (that include all costs of construction but would not include maintenance deposit, registration and insurance)	Upto Rs. 3,00,000/-	Upto Rs. 7,50,000/-	Upto Rs. 11,00,000/- (if specifications was better or jantri rate was more than Rs. 12,000/- sqmtr.	Upto Rs. 22,50,000/-
Annual family income	Less than Rs. 1,00,000/-	Rs. 1,00,000/- to Rs. 2,50,000/-	Rs. 1,00,000/- to Rs. 2,50,000/-	Rs. 2,50,000/- to Rs. 5,00,000/-

Also, as per Pradhan Mantri Awas Yojana (Urban), in order to avail credit linked subsidy scheme, the carpet area of the houses being constructed should be 30 sq. mtr. and 60 sq. mtr. for EWS and LIG respectively. However, in the present case, as per the home buyer list submitted by the Respondent none of the above parameter was complied with. Therefore, the above project was being considered as Residential Real Estate Project (RREP) and not affordable housing project.

10. The DGAP has also contended that the Respondent had accepted that there was benefit of ITC which was required to be passed on and the same had been passed on to the homebuyers as per the details mentioned in the homebuyer list

submitted by the Respondent. The Respondent also submitted that GST benefit of 2.80% on advances received during the period 01.07.2019 to 31.03.2019 was passed on to all the homebuyers. However, the correctness of the amount of benefit so passed on by the Respondent had to be determined in terms of Rule 129(6) of the Rules. Therefore, the ITC available to the Respondent and the taxable amount received by him from the Applicant No. 1 and other recipients post implementation of GST had to be taken into account for determining the benefit of ITC required to be passed on.

11. The DGAP has also contended that it was found that prior to 01.07.2017, i.e., before the GST was introduced, the Respondent was eligible to avail CENVAT credit of Service Tax paid on input services and credit of the VAT amount paid on the purchase of inputs. However, the CENVAT credit of the amount of Central Excise Duty paid on inputs was not admissible as per the CENVAT Rules in force at the material time. It was found that the Respondent had not availed any credit of VAT in the monthly VAT returns filed. Therefore, the credit of the VAT amount paid on the purchase of inputs and the VAT turnover was not considered for computation of the ITC ratio to taxable turnover for the pre-GST period, as mentioned above. Further post-GST, the Respondent could avail ITC of GST paid on inputs and input services including the sub-contracts. From the information submitted by the Respondent duly verified from the GSTR-1 and

GSTR-3B Returns for the period July, 2017 to July, 2020, the details of the ITC availed by him and his taxable turnover for the project "Swati Florence" during the said periods has been furnished by the DGAP in Table-B below:-

Table-'B' (Amount in Rs.)

S. No.	Particulars	Total (Pre-GST)	Total (Post-GST)
(1)	(2)	(3)	(4)
1	CENVAT of Service Tax Paid on Input Services as per ST-3 (A)	92,39,727	-
2	Input Tax Credit of VAT Paid on Purchase of Inputs as per VAT Returns (B)	-	-
3	Total CENVAT/Input Tax Credit Available (C)= (A+B)	92,39,727	-
4	Input Tax Credit of GST Availed as per GST Return (D)	-	6,73,88,672
5	Total Taxable Turnover as per homebuyer list (excluding turnover related to units sold post OC) (E)	19,64,04,028	63,86,78,536
6	Less Unit Cancelled (F)	-	-
7	Net Taxable Demand (G)	19,64,04,028	63,86,78,536
8	Total Saleable Area in the project (Sqmt) (H)	19,875	19,875
9	Area Sold relevant to Taxable turnover as per returns excluding area related to units sold post OC (I)	9,750	16,275
10	Relevant CENVAT/Input Tax Credit (J)= [(C)*(I)/(H)] or [(D)*(I)/(H)]	45,32,896	5,51,62,422
11	Ratio of CENVAT/ Input Tax Credit to Taxable Turnover [(K)=(J)/(G)]	2.31%	8.64%

12. The DGAP has also claimed that as per Table-'B' mentioned above, it was clear that the ITC as a percentage of the total turnover that was available to the Respondent during the pre-GST period (April, 2016 to June, 2017) was 2.31% and during the post-GST period (July, 2017 to July, 2020), it was 8.64%. This clearly confirmed that post-GST, the Respondent had been benefited from additional ITC to the tune of 6.33% [8.64% (-) 2.31%] of the taxable turnover.

13. The DGAP has mentioned that the matter of profiteering had been examined by comparing the applicable tax and ITC available for the pre-GST period (April,2016 to June, 2017) when Service Tax @4.5% was payable with the post-GST period (July, 2017 to July, 2020) when the effective GST rate was 12% (GST @18% along with 1/3rd abatement on value) on construction service, vide Notification No.11/2017-Central Tax (Rate), dated 28.06.2017. On the basis of the figures contained in Table-'B' above, the comparative figures of ITC availed/available during pre-GST period and post-GST period has been furnished by the DGAP in the Table-'C' below:-

Table-'C' (Amount in Rs.)

S. No.	Particulars		Pre-GST	Post- GST
1	Period	A	April,2016 to June,2017	July,2017 to July,2020
2	Output tax rate (%)	B	4.5%	12.00%
3	Ratio of CENVAT/ Input Tax Credit to Taxable Turnover as per Table - C above (%)	C	2.31%	8.64%
4	Increase in tax rate post-GST (%)	D= 12% less 4.5%	-	7.5%
5	Increase in input tax credit availed post-GST (%)	E= 8.64% less 2.31%	-	6.33%
6	Analysis of Increase in input tax credit:			
7	Base Price collected during July, 2017 to July, 2020 (excluding turnover related to units sold post OC)	F		63,86,78,536
8	GST Collected @ 12% over Basic Price	G= F*12%		7,66,41,424
9	Total Demand collected	H=F+G		71,53,19,960
10	Recalibrated Basic Price	I= F*(1-E) or 93.67% of F		59,82,60,184
11	GST @12%	J= I*12%		7,17,90,022
12	Commensurate demand price	K= I+J		67,00,40,206
13	Excess Collection of Demand or Profiteering Amount	L= H-K		4,52,79,754

14. The DGAP has intimated that from the Table-'C' above, it was clear that the additional ITC of 6.33% of the taxable turnover should have resulted in commensurate reduction in the base price as well as cum-tax price. Therefore, in terms of Section 171 of the CGST Act, 2017, the benefit of the additional ITC was required to be passed on to the recipients. The Respondent had not contested that any such benefit would eventually have to be passed on to the recipients. In fact, the Respondent had submitted that he had issued cheque of Rs. 28,101/- to the Applicant No. 1, which was not accepted by the Applicant No. 1. The Applicant No. 1 vide email dated 29.07.2020 had informed that the Respondent had offered 2.8% as ITC benefit and if this benefit was to be accepted, an affidavit had to be signed with the Respondent wherein it was specified that the home buyers agreed that on receipt of this GST benefit, there was no other amount remaining outstanding to be paid by the Respondent. Hence, the Applicant No. 1 did not accept the cheque.
15. The DGAP has also argued that having established the fact of profiteering, the next step was to quantify the same. On the basis of the aforesaid CENVAT/ITC availability pre and post-GST and the details of the amount collected by the Respondent from the Applicant No. 1 and other home buyers during the period 01.07.2017 to 31.07.2020, the amount of benefit of ITC not passed on, or in other words, the profited amount came to Rs. 4,52,79,754/- which included 12% GST on the base

profiteering amount of Rs. 4,04,28,352/-. The home buyer and unit no. wise break-up of this amount was given in Annex-12 of the report. This amount was inclusive of Rs. 71,031/- which was the profiteered amount in respect of the Applicant No. 1, mentioned at serial no. 29 of the report.

16. The DGAP has further submitted that the basis of the details of outward supplies of the construction service submitted by the Respondent it was observed that the service had been supplied in the State of Gujarat only.
17. The DGAP has stated that it was pertinent to mention here that the Respondent had claimed that he had passed on the benefit of Rs. 1,78,71,200/- to the home buyers. On-going through the home buyers list, it was observed that the cheque was not cleared for 04 home buyers, including the Applicant No. 1, who had not accepted the benefit passed on by the Respondent. Thus, the benefit of Rs. 2,36,217/- to these 04 home buyers had not been passed on by the Respondent and hence, this amount was reduced from the total benefit claimed to be passed on by the Respondent.
18. The DGAP has claimed that to substantiate the Respondent claim, the Respondent was asked to provide email addresses of the home buyers. The Respondent vide reply dated 06.11.2020 submitted that he was not maintaining the records of email address, hence, was unable to provide the same. Therefore, the


Applicant No. 1 vide email dated 19.11.2020 was requested to provide email address of home buyers, if available. The Applicant No. 1, vide email dated 19.11.2020 submitted email address of 177 home buyers. An email dated 19.11.2020 was written to these 177 home buyers to confirm the receipt of benefit of ITC. Out of the sent 177 emails, 36 emails were received. Out of 36, 32 confirmed the receipt of benefit of ITC from the Respondent and 04 home buyers (other than applicant) denied the receipt of any benefit. Out of 04 who had denied the receipt of benefit, 02 units had been sold post OC, as per home buyers list submitted by the Respondent. Out of remaining 02, 1 had not accepted the benefit passed on by the Respondent and had not received the cheque, as discussed in para 19 supra. The other one had not been passed on any benefit, as claimed by the Respondent. Thus, the amount of Rs. 1,18,873 was also to be passed on to this home buyer.

19. A summary of category-wise ITC benefit required to be passed on and the benefit claimed to had been passed on by the Respondent was furnished by the DGAP in Table-'D' below:-

Table-'D' (Amount in Rs.)

Sr. No.	Category of Customers	No. of Units	Area (In Sqmts)	Debitand Raised Post GST	Profiteering Amt. as per Annex-12	Benefit Passed on by the Noticee	Difference	Remarks
A	B	C	D	E	F	G	H=F-G	I
1	Applicant 1 (Residential)	1	75	10,01,814	71,031	0	71,031	Further Benefit to be passed on as per Annex-12
2	Other Buyers (Residential)	216	16200	63,76,78,622	4,52,06,722	1,75,18,110	2,76,82,612	Further Benefit to be passed on as per Annex-12
	Total	217	16275	63,86,78,636	4,63,79,753	1,75,18,110	2,77,83,643	

20. The DGAP has also mentioned that as per above Table "D", it was also observed that the benefit already passed on by the Respondent was less than what he ought to have passed on in case of 217 residential flats by an amount of Rs. 2,77,63,643/- The details of this amount was given in Annex-12. To support his claim of benefit already passed on, the Respondent had submitted sample copies of 05 agreements signed by the customers regarding receiving of the benefit.
21. The DGAP has also stated that the basis of above discussions, it was found that the benefit of additional ITC of 6.33% of the taxable turnover had in fact accrued to the Respondent and the same was required to be passed on to the Applicant No. 1 and other recipients. Thus, the Respondent had contravened the provisions of Section 171 of the CGST Act, 2017 in as much as the additional benefit of ITC @ 6.33% of the base price received by the Respondent during the period 01.07.2017 to 31.07.2020, had not been passed on to the Applicant No. 1 and other recipients. On this account, the Respondent had realized an additional amount to the tune of Rs. 4,52,79,753/- from the Applicant No. 1 and other home buyers, which included both the profiteered amount @6.33% of the taxable amount (base price) and GST on the said profiteered amount. However, the Respondent had suo-moto passed on total of Rs. 1,75,16,110/- to his home buyers. Therefore, the Respondent had profiteered by an amount of Rs. 2,77,63,643/- (4,52,79,753/- (-)

1,75,16,110/-) which included profiteered amount of Rs. 71,301/- in respect of the Applicant No. 1. This amount (Rs. 2,77,63,643/-) included both the profiteered amount @6.33% of the taxable amount (base price) and GST on the said profiteered amount from other recipients as well who was not applicant in the present proceedings. These recipients were identifiable as per the documents on record provided by the Respondent giving the names and addresses along with unit no. allotted to such recipients. Therefore, this additional amount of Rs. 2,77,63,643/- was required to be returned to such eligible recipients. 

22. The above Report was carefully considered by this Authority and a notice dated 04.12.2020 was issued to the Respondent to explain why the Report dated 27.11.2020 furnished by the DGAP should not be accepted and his liability for profiteering in violation of the provisions of Section 171 should not be fixed. The Respondent was also directed to file his written submissions by 17.12.2020. In reply to the notice dated 04.12.2020, the Respondent filed his submissions dated 21.01.2021, 25.03.2021 and 16.09.2021.
23. The Respondent and the Applicant No. 1 were also granted hearing by way of video conferencing on 29.03.2022. The Applicant No. 1 appeared for the hearing. Sh. Sanket Garg, Chartered Accountant appeared on behalf of the Respondent and during the course of hearing the Respondent requested the Authority to supersede all the existing replies, documents,

information or clarification filed earlier and allow him to file his final submissions. The request of the Respondent was considered by this Authority and he was directed to file his consolidated written submissions by 06.04.2022. The Respondent vide e-mail dated 06.04.2022 filed his consolidated written submissions vide which he has stated:-

- a. That he had already passed on the benefit of ITC to 261 homebuyers including the Applicant No. 1 @ 2.80%.
- b. That while calculating the profiteered amount, the DGAP has not considered the Cess on Service Tax amounting to Rs. Rs. 3,00,902/- in the pre-GST period. Considering the above fact, the Ratio of CENVAT to turnover would increase from 2.31% to 2.38% and profiteering may reduce from 6.33% to 6.26%. Further, the DGAP has also accepted the above and reduced the profiteering ratio from 6.33% to 6.26% in their letter dated 12.02.2021.
- c. That internally he has calculated that an amount of Rs. 1,80,71,648/- was the benefit of ITC required to be passed on to homebuyers and that he had passed on the above amount to his homebuyers except the 4 buyers who denied to accept the benefit.
- d. That as per his calculations, there were variation of figures while comparing the same with the calculation done by the

DGAP and the same has been illustrated in the Table mentioned below:-

Sl No.	Particulars	As per DGAP	As per Swati Realty	Difference
1	CENVAT credit of service Tax Paid on Input Services as per ST-3 (A)	95,40,629	1,54,89,728	69,49,099
2	Total Saleable area in the Project Sq.Mtr (H)	19,875	39,599.57	19,724.57
3	Area Sold relevant to Taxable turnover as per returns excluding area related to units sold post CC (I) (Pre GST)	9,750	9,958	208
4	Area Sold relevant to Taxable turnover as per returns excluding area related to units sold post CC (I) (Post GST)	16,275	16,559	284

- e. That the difference of Rs. 69,49,098/- is the amount of CENVAT Credit of VAT taken by him in the TRAN-1 Returns and the same has been certified and allowed to him by Gujarat VAT Authorities. Since GST Law was new and due to punching error, he has wrongly availed the VAT Credit of Inputs held in Stock as on 30.06.2017 in Table 7(a) – Duties and taxes on inputs instead of Table 7(c) – VAT and Entry Tax paid of TRAN-1. He had intimated the error to Gujarat VAT Authorities vide letter dated 27.08.2020 for accepting the said form. Copy of letter is also enclosed. Hence, referring the above-mentioned facts, he has requested to consider TRAN-1 in Pre GST ITC for the calculations of anti-profiteering amount.

- f. That the DGAP has taken Carpet area of units sold in the calculation, but build-up area should be taken, because conveyance deed was executed for "build-up area" and not only the "carpet area". While calculating the profiteered amount, the DGAP has considered the Total Saleable Area as 19875 sq. mt. which is the Carpet Area of the project. However, as per the BU Certificate the Total Saleable Area of the project came out to be 39599.57 sq. mt. (Build-up area). He has sold portion of the Common Area along with Carpet Area. Hence, total saleable area should be inclusive of Common Area. Hence, while computing the profiteered amount, 'Build-up Area' should have been considered by the DGAP in place of 'Carpet Area'. Thus, the remaining difference area of 19724.54 sq. mt. should also be added to the Carpet Area while computing the profiteered amount. He has also enclosed a copy of the BU Certificate.
- g. That in real estate sector, realtors and agents uses fascinating terms to attract the customers like Carpet Area, Built-up Area, Super Built-up Area (also known as Common Area). Among these words, Carpet area and Common areas are defined in Real Estate (Regulation and Development) Act, 2016, which are reproduced below:-

"carpet area" means the net usable floor area of an apartment, excluding the area covered by the external

walls, areas under services shafts, exclusive balcony or verandah area and exclusive open terrace area, but includes the area covered by the internal partition walls of the apartment.

Explanation :— For the purpose of this clause, the expression "exclusive balcony or verandah area" means the area of the balcony or verandah, as the case may be, which is appurtenant to the net usable floor area of an apartment, meant for the exclusive use of the allottee; and "exclusive open terrace area" means the area of open terrace which is appurtenant to the net usable floor area of an apartment, meant for the exclusive use of the allottee;

"common areas" mean —

- i. the entire land for the real estate project or where the project is developed in phases and registration under this Act is sought for a phase, the entire land for that phase;
- ii. the staircases, lifts, staircase and lift lobbies, fire escapes, and common entrances and exits of buildings;
- iii. the common basements, terraces, parks, play areas, open parking areas and common storage spaces;

- iv. the premises for the lodging of persons employed for the management of the property including accommodation for watch and ward staffs or for the lodging of community service personnel;
- v. installations of central services such as electricity, gas, water and sanitation, air-conditioning and incinerating, system for water conservation and renewable energy;
- vi. the water tanks, sumps, motors, fans, compressors, ducts and all apparatus connected with installations for common use;
- vii. all community and commercial facilities as provided in the real estate project;
- viii. all other portion of the project necessary or convenient for its maintenance, safety, etc., and in common use;

Formula to calculate these areas are as follows:

Carpet Area = Area of bedroom + living room + balconies + toilets – the thickness of the inner walls

Built-up Area = Carpet area + area of walls + area of balcony

Super Built-up Area = Built-up area + proportionate common area

- h. That in the Allotment Letter dated 12/06/2017, the Agreement to Sale dated 20/06/2017 and the Sale Deed dated 25/10/2018 issued to the Applicant No. 1, the Respondent has clearly mentioned the area to be sold to him would be (super built up area).
- i. That regarding the difference of 208 and 284 sq. mt., the Respondent submitted that in our previous replies he have some erroneous facts of the area of the Project as his internal data was scattered and reconciliation was not happened properly. Hence the revised one to be considered in the calculation.
- j. That all the communications of the Applicant No. 1 were baseless as he never denied him the payment of the benefit of ITC as claimed by him.
- k. That as per his calculations, he calculated the profiteered amount as per the methodology adopted by the DGAP and the benefit of ITC required to be passed on by him came to Rs. 1,64,52,359. However, he has already passed on the benefit of ITC amounting to Rs. 1,76,24,958 to the home buyers which is excess of anti-profiteering payable amount. He is also ready to pass on the benefit of ITC amounting to Rs. 2,36,217 to the remaining 4 homebuyers, who earlier denied taking the benefit. The calculation of profiteered

amount executed by the Respondent is provided in the Table mentioned below:-

S.No.	Particulars	Pre GST	Post GST
1	CENVAT credit of service Tax Paid on Input Services as per ST-3 (A)	16,489,728	-
2	Input tax credit of VAT Paid on Purchase of inputs as per VAT Returns (B)	-	-
3	Total CENVAT/ Input Tax Credit (pre-GST) C= A+B	16,489,728	-
4	ITC Availed of GST availed as per GST Returns- D	-	87,388,672
5	Total Taxable Turnover as per homebuyer list (excluding turnover related to units sold post OC) (E)	196,404,028	638,678,536
6	Less : Units Cancelled (F)	-	-
7	Net Taxable Demands (G)	196,404,028	638,678,536
8	Total Saleable area in the Project Sq.Mtr (H)	39,599.57	39,599.57
9	Area Sold relevant to Taxable turnover as per returns excluding area related to units sold post OC (I)	9,958.00	16,559.00
10	Relevant CENVAT/Input Tax Credit (J)= [(C*I)/(H)] or [(D*I)/(H)]	4,146,629	28,179,322
11	Ratio of CENVAT/ ITC to t/o (I) = H/E*100	2.11%	4.41%

S. No.	Period	A	1-4-2018 to 30-6-17	01-07-2017 to 31-7-2020
1	Output tax rate (%)	B	4.50%	12.00%
2	Ratio of CENVAT/VAT/GST Input Tax Credit to Taxable Turnover as per Table – B above (%)	C	2.11%	4.41%
3	Increase in Tax Rate Post GST (%)	D		7.50%
4	Increase in input tax credit availed post-GST (%)	E	-	2.30%
4	Analysis of Increase in Input tax credit:			
6	Base Price collected during July ,2017 to July,2020 (excluding turnover related to units sold post OC)	F		638,678,536
6	GST collected over Base-Price	G= F*12%		76,641,424
7	Total demand collected	H= F+G		715,319,960
8	Recalibrated Basic Price	I=F*(1-E) or 93.67% of F		623,988,930
9	GST @12%	J=I*12%		74,878,672
10	Commensurate demand price	K=I+J		698,867,601
11	Excess Collection of Demand or Profiteered Amount (Inc. GST)	L=H-K		16,452,359

10

24. Clarifications under Rule 133(2A) of the CGST Rules, 2017 were also sought from the DGAP on the submissions dated 21.01.2021 and 25.03.2021 filed by the Respondent. The DGAP has filed his clarifications dated 12.02.2021 and 11.06.2021 vide which he has stated:-

- a. That the details/data has been collated from the statutory documents/ information submitted by the Respondent. However, on re-verification it was found that the amount of Cess on S. Tax has not been added in the pre-GST period which is Rs.3,00,902/-. Considering the above fact, the Ratio of CENVAT to turnover would increase from 2.31% to 2.38% and profiteering may reduce from 6.33% to 6.26 %.
- b. That the main focus for the calculation of profiteering is to pass on the additional benefit of ITC accrued to the Respondent and the profiteering, if any, is determined at a point of time when demand is raised from the customer, and benefits of additional ITC as available should be passed on to the customers at that point itself.
- c. That there has been no comparison of periods for calculation of profiteering. The whole purpose of taking period of 15 months is to cover a reasonable period just before the GST so that proper & representative assessment of percentage of ITC available to the

Respondent just before the transition to GST era could be arrived at. Further, during this period there was no variation of rate of tax on services. Therefore, this period was taken to find out the average ratio of input tax credit availability with turnover. The ratio of ITC and turnover in Pre-GST is compared with ratio of ITC in post GST. The period during the GST period may be one month or one year, depending upon the period of investigation. It does not mean that if the period is larger than the availability of ITC would increase or decrease but it only gives a ratio which represents the period for comparison.

- d. That the DGAP's investigation has no mandate to examine the cost component, market condition or inflation. Section 171 of the CGST Act, 2017, mandates that any benefit of reduction in the rate of tax or the benefit of input tax credit which accrues to a supplier must be passed on to the consumers as both are concessions given by the Government and the suppliers are not entitled to appropriate such benefits by increasing their profit margin at the cost of the consumers. Such benefits must go to the consumers.
- e. That this is not a case of rate reduction but the issue relates to additional amount of ITC available to the Respondent i.e. the amount of ITC which was not available in pre GST era, is now available to him.

- f. That the Investigation Report has considered the proportionate credit of sold unit only for calculation of profiteering and credit of unsold units is not part of the investigation.
- g. That in the erstwhile tax regime (pre GST) various taxes and cesses were being levied by the Central Government and the State Governments, which got subsumed in the GST. Out of these taxes, the input tax credit (ITC) in some cases was not allowed in the erstwhile tax regime. In case of construction service, while the ITC of Service Tax was available, the ITC of Central Excise duty paid on inputs was not available to the service provider. Such input taxes, the credit of which was not allowed in the erstwhile tax regime, used to get embedded in the cost of the goods or services supplied, resulting in increased price. With the introduction of GST w.e.f. 01.07.2017, all these taxes got subsumed in the GST and the input tax credit of GST is available in respect of all goods and services, unless specifically denied. The method adopted is to find out the ratio of CENVAT/ITC to taxable turnover in the pre-GST era as well as post-GST era, which is nothing but an exercise to find out the accrual of additional amount of ITC, if any, in the post-GST era.
- h. That as per Rule 126 of the CGST Rules, 2017, this Authority has been empowered to determine the

methodology and procedure for determination as to whether the reduction in the rate of tax or the benefit of ITC has been passed on by the registered person to the recipients by way of commensurate reduction in prices.

- i. That the Authority in exercise of power delegated to it under the Rule 126 has notified the Methodology & Procedure vide Notification dated 28.03.2018 which is also available on the website. However, it is submitted that no fixed/uniform mathematical methodology can be determined for all the cases of profiteering as the facts and circumstances of each case as well as the nature of goods or services supplied in each case differ. Therefore, the determination of the profiteered amount has to be computed by taking into account the particular facts of each case. The computation of commensurate reduction in prices is purely a mathematical exercise which is based upon the above parameters and hence it would vary from case to case and hence no fixed mathematical methodology can be prescribed to determine the amount of benefit which a supplier is required to pass on to a recipient or the profiteered amount.
- j. That the additional benefit of ITC has nothing to do with the output GST rate. The intent of Section 171 of the CGST Act, 2017 is very clear that any additional benefit of the ITC needs to be passed on to the customers.

- k. That the legislature had delegated the task of prescribing the powers and functions of the Authority to the Central Government as per Section 171 of CGST Act, 2017 read with Section 2 (87) of the Act, on the recommendation of the GST Council. The Central Government, on the recommendation of the GST Council, which is a constitutional Federal Body under 101th Amendment of the constitution has formulated and notified Rule 126, 127 and 133 which prescribe the functions, duties and power of the Authority. All Rules of Anti profiteering have been framed under Section 164 of the said Act which has the sanction of the Parliament and the State Legislatures. It also shows that the delegated power to the Authority given under section 171(3) of the said Act has been duly exercised by the Central Government by formulating the Rules, on the recommendation of the GST Council. Therefore, the powers to determine its own methodology under Rule 126 is just and enables the Authority to clarify and effectuate the powers given and functions to be discharged by the Authority and this enabling provision has been granted to the Authority after careful consideration at several stages and levels and therefore there is no ground for claiming that the present delegation is excessive or arbitrary.
- l. That the word profiteered should be construed as prospective is not correct, as the Explanation to Section

171 (3A) has defined the word profiteered, inserted vide the Finance (No. 2) Act, 2019(23of 2019) dated 01.08.2019. In this context it is to clarify that any explanation added to an existing statute is to clarify the confusion and to convey the intent of the provisions. Hence, it has retrospective effect.

m. That the DGAP has considered area from the home buyer list, as submitted by the Respondent during the investigation. In the homebuyer list, size for each flat is mentioned as 75 Sq. Mt. and the same was considered for calculation of profiteering. Hence, there was no error in calculation of area of the project. Therefore, the contention of the Respondent was not acceptable.

n. Further, from the perusal of details given by the Respondent, it is observed that the entire exercise taken by the Respondent is to increase the ratio of turnover and CENVAT in pre-GST and to decrease the ratio of turnover and CENVAT in post GST period. To achieve this goal, they have given a new range of area of flats varying between 79.78 sq. mt. to 79.96 sq. mt. The DGAP has calculated the profiteering as given by the Respondent and has been kept as same in pre and post GST era.

o. That as per the home buyer list submitted by the Respondent, the saleable area was mentioned as 75 sq.

mt. The Respondent had not made any submission regarding different areas of a flat during the investigation. These are the new facts submitted by the Respondent. The saleable area mentioned in the home buyer list was considered for calculation of profiteering, the DGAP has taken the same area given by the Respondent in pre and post GST and thus no harm was caused to the Respondent. The Respondent has also not admitted that he had provided incorrect data earlier.

p. That the ITC relevant to taxable turnover has been considered for calculation of profiteering. In terms of Section 171 of the CGST Act, 2017, the provisions of Anti-profiteering was attracted as and when a Supplier did not extend the benefit of additional ITC accrued to him due to GST implementation. Thus, any such additional benefit, whether for the common area or individual area, were required to be extended the Recipients. Further, the demand/Charges taken by the Supplier also included the expenses on common. All demands where tax was being charged was covered under the scope Anti profiteering if the criterion of Section 171 was fulfilled. Hence profiteering for common area has to be calculated as the Supplier has availed ITC on the same.

q. That the ITC available to the Respondent in pre-GST period (i.e. for the period from 2016-17 to June, 2017) was

considered for calculation of profiteering. The credit available in TRAN-1 was nothing but closing balance of the ITC available to the Respondent as on 30.06.2017. The same could not be considered again. Further, the Respondent has not availed any Credit of VAT in the statutory returns for the period. Therefore, the contention of the Respondent was not acceptable.

r. That the profiteering has been calculated for the units sold before OC. The area, turnover as well as relevant ITC for the units sold post OC, has already been excluded from the profiteering calculation.

25. The proceedings in the matter could not be completed by the Authority due to lack of required quorum of Members in the Authority during the period 29.04.2021 till 23.02.2022, and that the minimum quorum was restored only w.e.f. 23.02.2022 and hence the matter was taken up for proceedings vide Order dated 14.03.2022 and hearing in the matter through Video Conferencing was scheduled to be held on 29.03.2022 which was attended by the Applicant no. 1 and the Respondent. The Applicant No. 1 has also filed his submissions vide e-mail dated 30.03.2022 and has submitted copy of Sale Deed, Agreement for Sale, Allotment Letter, Index Copy and Invoice issued to him by the Respondent. The Respondent has filed his consolidated written submissions dated 6.04.2022.

has been no reduction in the rate of tax in the post GST period; hence the only issue to be examined is as to whether there was any net benefit of ITC with the introduction of GST.

29. On this issue it has been reported by the DGAP as tabulated above that the ITC as a percentage of the turnover that was available to the Respondent during the pre-GST period (April-2016 to June-2017) was 2.31% and during the post-GST period (July-2017 to July-2020), it was 8.64%. Hence, according to the DGAP, post-GST, the Respondent has been benefited from additional ITC to the tune of 6.33% [8.64% (-) 2.31%] of his turnover and the same was required to be passed on to the Applicant No. 1 and the other flat buyers. Therefore, the amount of ITC benefit to be passed on to all the flat/shop buyers/customers is Rs. 4,52,79,754/-.
30. The Respondent has contended that while calculating the profiteered amount, the DGAP has not considered the CENVAT Credit of VAT amounting to Rs. 69,49,098/- availed by him in his TRAN-1 Returns. The Respondent has also submitted a copy of the TRAN-1 Returns filed by him. With regard to the above contention, this Authority finds that while arriving at the ratio of CENVAT/ITC to Turnover Ratio, the CENVAT/ITC available to the Respondent in the pre-GST period has been considered by the DGAP. It is also evident from the Investigation Report of the DGAP that the Respondent did not avail any Credit of VAT in his monthly VAT Returns filed and

thus, the Credit of VAT amount paid on purchase of inputs was not considered for the computation of ITC to Taxable Turnover Ratio for the pre-GST period. Further, the Respondent has not submitted any VAT Assessment Order vide which the VAT Authorities have confirmed that the above amount of ITC of VAT as claimed by him was correct and the Respondent was eligible to avail the same. Upon perusal of the VAT Authority letter submitted by the Respondent, it is observed that the VAT Authority has mentioned that the Respondent has filed his TRAN-1 within due date and claimed Rs. 69,49,098/- as ITC of VAT in his TRAN-1 Return. The above Authority has nowhere claimed that the ITC of VAT claimed by the Respondent was correct and he was eligible for the same. Therefore, in view of above, it can be concluded that in the absence of any documentary proof i.e. VAT Return, VAT Assessment Order etc., the CENVAT Credit of VAT amounting to Rs. 69,49,098/- claimed by the Respondent in his TRAN-1 Returns cannot be considered while computing the ratio of CENVAT/ITC to Turnover in the pre-GST period. Hence, the above contention made by the Respondent cannot be accepted.

31. The Respondent has also argued that while calculating the profiteered amount, the DGAP has considered the Total Saleable Area as 19875 sq. mt. which was the Carpet Area of the project. However, as per the BU Certificate the Total Saleable Area of the project came out to be 39599.57 sq. mt.

(Built-up area). Hence, for the purpose of calculation of profiteered amount, Built-up Area of 39599.57 sq. mt. should have been considered in place of 'Carpet Area' of 19875 sq. mt. In this regard, this Authority finds that as per the home buyers list provided by the Respondent, size of each Flat was mentioned as 75 sq. mt. and the profiteering amount has been calculated based on the area as per the home buyers list provided by the Respondent. Considering the figures of 'Total Saleable Area' and 'Sold Area' from the home buyers list is the standard mathematical practice adopted while calculating the benefit of additional ITC required to be passed on by any Construction Services provided to his customers/home buyers/recipients. Hence, if 'Built-up Area' is considered in place of 'Carpet Area', we would arrive at incorrect amount of profiteering. Hence, the above contention of the Respondent is not correct and cannot be accepted.

32. It has also been contended by the Respondent that the DGAP has adopted incorrect figures of 'Area Sold Relevant to Turnover' in the pre and post GST period as 9,750 sq. mt. and 16,275 sq. mt. respectively, whereas as per his calculations, it should have been 9,958 sq. mt. and 16,559 sq. mt. respectively. With respect to the above contention of the Respondent, we find that the DGAP has taken the figures of the 'Area Sold Relevant to Turnover' from the data provided by the Respondent during the investigation. Hence, the same has

been taken from the home buyers list provided by the Respondent. Any such claim regarding the incorrect figures of Area Sold Relevant to Turnover is an afterthought and cannot be considered. Hence, the above contention of the Respondent is not tenable.

33. The Respondent has argued that while calculating the profiteered amount, the Cess on Service Tax amounting to Rs. 3,00,902/- has not been considered in the pre-GST period. With respect of the above contention, we find that in the pre-GST regime, CENVAT Credit of Krishi Kalyan Cess (KKC) could be utilised only towards payment of Krishi Kalyan Cess, if leviable, on taxable services provided. However, Swachh Bharat Cess (SBC) was not allowed as CENVAT Credit against the output service tax or SBC liability. Therefore, there was a clear demarcation of the credit in respect of both the Cesses (KKC & SBC) and it can be concluded that Tax and Cess are distinct levies. Further, the Hon'ble High Court of Delhi in the case of Cellular Operators Association of India has held that KKC could not be treated as Excise Duty or Service Tax. Therefore, both the above Cesses could not be carried forward under the GST-regime. Hence, the Cess on Service Tax could not be considered as Input Tax Credit and the same could not be considered while calculating the profiteered amount. Therefore, the contention of the Respondent being incorrect, cannot be accepted.


26. We have carefully considered all the submissions filed by the Applicant No. 1, the Respondent, and the other material placed on record and find that Applicant No. 1 had alleged that the Respondent was not passing on the benefit of ITC to him on purchase of the Flat, which he had purchased in the "Swati Florence" Project being executed by the Respondent in Ahmedabad, Gujarat by way of commensurate reduction in the prices after the implementation of the GST w.e.f. 01.07.2017. This complaint was examined by the Standing Committee and forwarded to the DGAP for investigation under Rule 129 (1) of the above Rules. The DGAP vide his Report dated 27.11.2020 had found that the Respondent had profiteered an amount of Rs. 4,52,79,754/- by not passing on the ITC benefit to his buyers.
27. On examining the various submissions we find that the following issues need to be addressed:-
- i. Whether there was any violation of the provisions of Section 171 (1) of the CGST Act, 2017 in this case?
 - ii. If yes what was the additional benefit that has to be passed on to the recipients?
28. We find that, Section 171 (1) of the CGST Act, 2017 deals with two situations one relating to the passing on the benefit of reduction in the rate of tax and the second pertaining to the passing on the benefit of the ITC. On the issue of reduction in the tax rate, it is apparent from the DGAP's Report that there

34. The Respondent has also submitted his own calculations and arrived at profiteered amount of Rs. 1,64,52,359/-. The above profiteered amount was arrived at by including the CENVAT/ITC of VAT amounting to Rs. 69,49,098/- and considering the Build-up Area of 39,599.57 sq. mt. as the Total Saleable Area in place of the Area of 19,875 sq. mt. considered from the homebuyers list. In this regard, this Authority finds that the above profiteered amount calculated by the Respondent is incorrect as the inclusion of the CENVAT Credit of VAT amounting to Rs. 69,49,098/- is not possible as the Respondent has not produced any VAT Return/VAT Assessment Order evidencing that he was eligible to avail the above credit of VAT. Further, the exact quantum of profiteering cannot be computed by considering the Build-up Area in place of the Area from the homebuyers list. Hence, the calculations to arrive at profiteering amount carried out by the Respondent is not correct and cannot be accepted as discussed in paras above.
35. Hence, the Authority finds no reason to differ from the above-detailed computation of profiteering in the DGAP's Report or the methodology adopted. The DGAP's Report concludes that the ITC as a percentage of the turnover that was available to the Respondent for the project 'Swati Florence' during the pre-GST period (April-2016 to June-2017) was 2.31% and during the post-GST period (July-2017 to July-2020), it was 8.64%. This confirms that, post-GST, the Respondent has been

benefited from additional ITC to the tune of 6.33% (8.64% - 2.31%) of his turnover and the same was required to be passed on to the customers/home buyers/recipients. Hence, as tabulated in Table 'C' above, the Authority determines the profiteered amount for the period from July-2017 to July-2020, in the instant case, as Rs. 4,52,79,754/- and the same was required to be passed on by the Respondent to their customers/home buyers/recipients.

36. It is also evident from the Report of the DGAP that during the investigation, the Respondent has claimed that he has passed on benefit of ITC amounting to Rs. 1,78,71,200/- to the customers/home buyers/recipients. To verify the claim of the Respondent, the DGAP sent e-mails to 177 customers/home buyers/recipients asking them to confirm whether they have received the benefit of ITC as claimed by the Respondent. Out of 177 customers/home buyers/recipients, only 36 customers/home buyers/recipients replied. Out of these 36 customers/home buyers/recipients, only 32 customers/home buyers/recipients confirmed the receipt of benefit of ITC from the Respondent. Hence, the verification of passing on the benefit of additional ITC done by the DGAP is not conclusive and it cannot be confirmed that the Respondent has passed on an amount of Rs. 1,78,71,200/- to his customers/home buyers/recipients. Therefore, the profiteered amount required to

be passed on to the customers/home buyers/recipients by the Respondent is determined to be Rs. 4,52,79,754/-.

37. Thus, the Authority finds that the Respondent has profiteered by an amount of Rs. 4,52,79,754/- during the period of investigation i.e. July-2017 to July-2020. The above amount that has been profiteered by the Respondent from his customers/home buyers/recipients in the above project shall be refunded by him, along with interest @18% thereon, from the date when the above amount was profiteered by him till the date of such refund/return/payment, in accordance with the provisions of Rule 133 (3) (b) of the GCST Rules 2017. 
38. This Authority under Rule 133 (3) (a) of the CGST Rules, 2017 orders that the Respondent shall reduce the prices to be realized from the buyers of the customers/home buyers/recipients commensurate with the benefit of ITC received by him as has been detailed above.
39. The Respondent is also liable to pay interest as applicable on the entire amount profiteered, i.e. Rs. 4,52,79,754/-. Hence the Respondent is directed to also pass on interest @18% to the customers/flat buyers/recipients on the entire amount profiteered, starting from the date from which the above amount was profiteered till the date of passing on/ payment, as per provisions of Rule 133 (3) (b) of the CGST Rules 2017.
40. We also order that the profiteering amount of Rs. 4,52,79,754/- along with the interest @ 18%, from the date of receiving of

profiteered amount from the customers/home buyers/recipients till the date of passing the benefit of ITC/profiteered amount, shall be paid/passed on by the Respondent within a period of 3 months from the date receipt of this order failing which it shall be recovered as per the provisions of the CGST Act, 2017.

41. The amount to be refunded to each customer/home buyer/recipient is as per Annexure A attached with this Order.
42. It is also evident from the above narration of facts that the Respondent has denied benefit of ITC to his customers/home buyers/recipients in contravention of the provisions of Section 171 (1) of the CGST Act, 2017 and has committed an offence under Section 171 (3A) of the above Act. That Section 171 (3A) of the CGST Act, 2017 has been inserted in the CGST Act, 2017 vide Section 112 of the Finance Act, 2019, and the same became operational w.e.f. 01.01.2020. As the period of investigation was July-2017 to July-2020, therefore, he is liable for imposition of penalty under the provisions of the above Section for the amount profiteered from 01.01.2020 onwards. Accordingly, notice be issued to him.
43. The concerned jurisdictional CGST/SGST Commissioner is directed to ensure compliance of this Order. It may be ensured that the benefit of ITC is passed on to each customers/home buyers/recipients as details provided above along with interest @18%, if not paid already. In this regard an advertisement of appropriate size to be visible to the public may also be

published in minimum of two local Newspapers/vernacular press in Hindi/English/local language with the details i.e. Name of builder (Respondent): Swati Realty, Project: Swati Florence, Location: Ahmedabad, Gujarat and Amount of Profiteering: Rs. 4,52,79,754/-, so that the concerned customers/home buyers/recipients can claim the benefit of ITC, if not passed on. Customers/home buyers/recipients may also be informed that the detailed NAA Order is available on Authority's website www.naa.gov.in. Contact details of concerned Jurisdictional CGST/SGST Commissioner may also be advertised through the said advertisement.

44. The concerned jurisdictional CGST/SGST Commissioner shall also submit a Report regarding compliance of this order to this Authority and the DGAP within a period of 4 months from the date of receipt of this order.
45. Further, the Hon'ble Supreme Court, vide its Order dated 23.03.2020 in Suo Moto Writ Petition (C) no. 3/2020, while taking suo-moto cognizance of the situation arising on account of Covid-19 pandemic, has extended the period of limitation prescribed under general law of limitation or any other special laws (both Central and State) including those prescribed under Rule 133(1) of the CGST Rules, 2017, as is clear from the said Order which states as follows:-

"A period of limitation in all such proceedings, irrespective of the limitation

prescribed under the general law or Special Laws whether condonable or not shall stand extended w.e.f. 15th March 2020 till further order/s to be passed by this Court in present proceedings."

Further, the Hon'ble Supreme Court, vide its subsequent Order dated 10.01.2022 has extended the period(s) of limitation till 28.02.2022 and the relevant portion of the said Order is as follows:-

"The Order dated 23.03.2020 is restored and in continuation of the subsequent Orders dated 08.03.2021, 27.04.2021 and 23.09.2021, it is directed that the period from 15.03.2020 till 28.02.2022 shall stand excluded for the purposes of limitation as may be prescribed under any general or special laws in respect of all judicial or quasi-judicial proceedings."

Accordingly this Order having been passed today falls within the limitation prescribed under Rule 133(1) of the CGST Rules, 2017.

46. Copy of this order be sent, free of cost to the Applicant No. 1, the DGAP, the Respondent, Commissioners CGST/SGST

Ahmedabad (Gujarat) and the Principal Secretary (Town and Country Planning), Government of Gujarat for necessary action. File be consigned after completion.

Annexed: Annexure A in Pages 1 to 6.



Sd/-
(Amand Shah)
Technical Member &
Chairman

Sd/-
(Pramod Kumar Singh)
Technical Member

Sd/-
(Hitesh Shah)
Technical Member

Certified Copy


(Dinesh Meena)
Secretary, NAA

File No. 22011/NAA/232/Swati Realty/2020

Date:-01.08.2022

Copy To:-

1. M/s Swati Realty, 11th Floor, Signature-1, Nr. Divya Bhaskar, Opp. Andaz Party Plot, Mukarba, S.G. Highway, Ahmedabad, Gujrat-380051.
2. Shri Nilang Shastri, A-801, Swati Florence, Nr. SOBO Centre, South Bhopal, Ahmedabad, Gujrat-380058.
3. Directorate General of Anti-Profiteering, 2nd Floor, Bhai Vir Singh Sahitya Sadan, Bhai Vir Singh Marg, New Delhi-110001.
4. Chief Commissioner Central Goods and Service Tax, Ahmedabad Zone, 7th Floo, CGST Bhavan, Revenue Marg, Opp. Poly., Ambawadi, Ahmedabad-380015.
5. Commissioner Commercial Tax, C-5, Rajya Kar Bhavan, Near Times of India, Ashram Road, Ahmedabad.
6. Office of the Chief Town Planner, Town Planning & Valuation Department, Opp. St. Xaviers School, Road No. 3, Sector-10/A, Gandhinagar-382010 (ctp-udd@gujarat.gov.in).
7. Guard File.



ANNEXURE-A
LIST OF HOME BUYERS AND JOINT OWNERS OF THE PROJECT 'Swati Florence'

S.No.	Name of Customer - 1	Name of Customer - 2	Name of Customer - 3	Unit No.	Total Profit/loss (Amount in Rs.)
1	HARSH BHAVARLAL SHAH	-	-	A-103	347,390
2	GURPEET KAUR PRATIK SHAH GULWAN	KALPANA SHAILESH SHAH	-	A-102	333,132
3	KRINA SHAH	-	-	A-103	202,955
4	SHARMA DINKAR KUMAR BABULAL	SHARMA YOGESH BABULAL	MAI BABULAL PARSOTTAM	A-104	164,901
5	SHAH KAPIL HITENDRAKUMAR	SHAH DARSHINA KAPIL	-	A-201	184,519
6	VIDHI J SONI	-	-	A-202	356,480
7	TUJEJA MANPREET JITENDER SINGH	TUJEJA JITENDERSINGH THAKURBIRSINGH	-	A-203	48,326
8	NIMISHA MAULIK PATEL	MAULIK ARVINDBHAI PATEL	-	A-204	144,845
9	NARESHBHAI PRAMUKHBHAI PATEL	-	-	A-301	249,596
10	HITESHBHAI CHANDULAL SUKHADIYA	NISHABEN HITESHBHAI SUKHADIYA	-	A-302	239,318
11	B. SANJAY KUMAR PRASHAD	-	-	A-303	*
12	MERALBEN MANISHBHAI PATEL	MANISHBHAI AMBALAL PATEL	-	A-304	180,044
13	KOTHARI SANGITABEN H	KOTHARI HARENDRABHAI PANACHANDBHAI	-	A-401	110,973
14	SHARAD KUMAR J MISTRY JITENDRAKUMAR N. THAKKAR	-	-	A-402	248,561
15	-	MINAKSHIBEN J. THAKKAR	-	A-403	279,042
16	RASHMI KETAN DAVE GANDHI SMITABEN	-	-	A-404	10,447
17	VASTUPAL	GANDHI ROMIL VASTUPAL	-	A-501	251,186
18	VINEET BIPINKUMAR AMIPARA	RAJA VINEET AMIPARA	-	A-502	345,788
19	PANKAJ DNYANDEO PATIL	TRUPTI PATIL	-	A-503	178,242
20	GEETA JITENDRABHAI RAJA	-	-	A-504	230,837
21	DEVANG HASUBHAI GOHIL	-	-	A-601	287,792
22	NIKUNI GOVINDBHAI RANPURA	PANKAJ GOVINDBHAI RANPURA	-	A-602	248,136
23	JAYSHREEBEN DIPAKBHAI SHAH	NIRAV DIPAKBHAI SHAH	-	A-603	158,660
24	NIRAV ATULBHAI SHAH	DIPTI NIRAV SHAH	-	A-604	158,688
25	PYUSH KUMAR	-	-	A-701	158,035
26	BHAVNABEN DIPAKBHAI SHAH	SHAH DEVANSH DEEPAK	-	A-702	248,136
27	BHARAT NATVARLAL PAREKH	-	-	A-703	25,518
28	RAJESHKUMAR DALSUKHRAI MEHTA	-	-	A-704	154,413
29	NILANG MAHESHBHAI SHASTRI	MIYURIBEN NILANG SHASTRI	-	A-801	71,002
30	MAULIK KUMAR N VIRPARIA	RUPALBEN M VIRPARIA	-	A-802	291,039
31	PARIKH RAVI NAIL/SHBHAI	PARIKH NAILESH GOVINDBHAI	PARIKH CHETNA NAILESHBHAI	A-803	148,280
32	SHILPY KANAUIJA	KAMAL KANT KANAUIJA	-	A-804	192,315
33	PAYAL JAIN	RAHUL JAIN	-	A-901	*
34	ABHISHEK GOENKA	-	-	A-902	356,380
35	RATHI PUSHPA MITHANKUMAR	MITHANKUMAR KESHAVLAL RATHI	-	A-903	133,215
36	TEJAL J. MAITHIYA	-	-	A-904	171,708
37	BHARGAVKUMAR HARGOVINDBHAI CHAUHAN	HARGOVINDBHAI SAVJIBHAI CHAUHAN	-	A-1001	220,388
38	DINESH BABULAL KANODIA VADNER VIRBHADISINH GHANSHYAMSINH	DISHANK DINESH KANODIA	-	A-1002	230,270
39	-	-	-	A-1003	335,111
40	JAGAT PARTAP SINGH	SHIFALI SHARMA	-	A-1004	*
41	SHANTILAL GORDHAN SAVALIA	-	-	A-1101	144,279

42	KAVATHIYA VARSHABEN VINUBHAI	KAVATHIYA ANKURKUMAR VINODDBHAI	-	A-1102	*
43	VORA KHUSHIT PIVUSHBHAI	PIYUSH NAGINDAS VORA	DARSHNABEN PIYUSH VORA	A-1103	271,048
44	KURUSH ROHINTON GAZDAR	KHUSHNUM KURUSH GAZDAR	BINA KURUSH GAZDAR	A-1104	4,588
45	DHARMENDRA BHANUCHANDRA SHAH	SONAL DHARMENDRA SHAH	-	A-1201	248,136
46	NAIMESH NARAN DADHANIA	-	-	A-1202	291,096
47	AAKASH JAIN	RAJEEV PRAKASHCHAND JAIN	-	A-1203	131,357
48	SHALIN DEVEN SHAH	MANSIBEN SHALIN SHAH	-	A-1204	336,731
49	HITENDRA DHANVANTRAJ BHATT	-	-	A-1301	248,136
50	BHATT BHAVNA HITENDRA	-	-	A-1302	248,136
51	DHRUV RAJESH KUMAR PARIKH	GANDHI KUSHANI RAJENDRABHAI	-	A-1303	*
52	KIRAN AMRITLAL GUDHKA	SEJAL KIRAN GUDHKA	-	A-1304	222,117
53	MEHUL KASMLKHBHAI THAKKAR	DIPIKA MEHUL THAKKAR	-	A-1401	*
54	VAGHELA KHUSHBU NARENDRA	NEETABEN N VAGHELA	-	A-1402	*
55	SAGAR SAHEBRAO DEORE	SUNITA VIJAY NIKUM	-	A-1403	*
56	NALINKUMAR DALSUKHRAJ MEHTA	ILA NALINKUMAR MEHTA	-	A-1404	338,731
57	MAHJUSUDAN P. DABHOLE	MAYURI M. DABHOLE	-	B-101	149,857
58	SHAH VIKAS HASMUKH	-	-	B-102	250,043
59	TARU LATA BAZARI	RAGHAVENDRA BAZARI	-	B-103	318,848
60	SONAL MAULIK THAKKER	MAULIK RAMESHKUMAR THAKKER	-	B-104	112,858
61	DARSHINI MALAY DESAI	MALAY FARISHCHANDRA DESAI	-	B-201	96,982
62	KIRANBEN BHOGILAL PATEL	PATEL VIRAL K	-	B-202	147,789
63	BHARAT RAMBHAI PAREKH	-	-	B-203	248,136
64	ANITA B. GOR	-	-	B-204	353,010
65	KRISHNA NAGAPPA NALAWADE	JAYSHREE KRISHNA NALAWADE	-	B-301	147,691
66	JOSHI BHAVESH YOGESHBHAI	-	-	B-302	246,508
67	KIRIT RAMBHAI PAREKH	-	-	B-303	248,136
68	KUSHWANA URMILABEN HARENDRASINGH	KUSHWANA HARENDRASINGH ALGUSINGH	-	B-304	208,417
69	SARLABEN KIRITBHAI CHAUDHRI	KIRITBHAI C. CHAUDHRI	-	B-401	127,938
70	PATEL ATULBHAI RATILALBHAI	-	-	B-402	246,508
71	BELA PINAK MANSAWALA	PINAK RAMESHCHANDRA MANSAWALA	-	B-403	351,903
72	SHILPESH BALUBHAI PATEL	-	-	B-404	78,179
73	ACHALA AGRAWAL	-	-	B-501	170,967
74	JAGDISH KISHAVLAL PARMAR	-	-	B-502	155,329
75	SHAH HIRENKUMAR NANDLAL	SHAH PURVI HIRENKUMAR	-	B-503	259,076
76	BIRENDRA NATH MANDAL	JAYSHREE MANDAL	-	B-504	179,002
77	RANJANA BHARAT JOGI	PANKESH BHARAT JOGI	-	B-601	349,765
78	MUKESHKUMAR VERMA	NEETU VERMA	-	B-602	212,088
79	AVANIBEN SAGARKUMAR PARMAR	PARMAR SAGARKUMAR RAJENDRAKUMAR	-	B-603	331,283
80	GHANSHYAMBHAI FULABHAI GOHEL	JYOTSNABEN G GOHEL	-	B-604	7,698
81	DHARA JEPAL SHAH	JEPAL HIMANSHU SHAH	-	B-701	117,572
82	HITESH ASHOK KUMAR BHOJWANI	KIRAN ASHOK KUMAR BHOJWANI	-	B-702	352,465
83	CHIRAG PRAHALADBHAI JOSHI	-	-	B-703	282,095
84	MUKESH CHOITHRAMANI	RANI MUKESH CHOITHRAMANI	-	B-704	76,538
85	VINEET KHANDELWAL	NIDHI KHANDELWAL	-	B-801	198,537
86	JIGNESH A. PANDIT	PRIYANTA J. PANDIT	-	B-802	356,480

87	DHARA B. SHAH	BOBBY SHAH	-	B-803	280,465
88	BHOOMI DAVE	ASHISH SAGAR	-	B-804	237,008
89	SACHIN MOHANBHAI TANDEL	KANCHAN SACHIN TANDEL	-	B-901	129,516
90	SHASHIKANT VITHALDAS CHHATRALA	VIVEK KUMAR SHASHIKANT CHHATRALA	-	B-902	135,642
91	SHAH VIHANG CHANDRAKANT	RACHANA VIHANG SHAH	-	B-903	214,214
92	BRIENDRA KUMAR RAM NARAYAN PRASAD	FARIDI RAHMAT JAHAN	-	B-904	230,941
93	BHAVSAR SHIVANGKUMAR MAHESHKUMAR	BHAVSAR TRUPTI SHIVANGKUMAR	-	B-1001	117,682
94	JYOTSNA TAHILIANI	-	-	B-1002	280,465
95	BHARTI R. CHAWLA	RIYA M. CHAWLA	-	B-1003	351,361
96	AJAY KARMARKAR	SNEHAL KARMARKAR	-	B-1004	242,699
97	PARITA SIDDHARTH JOGI	RUKESH MAGANPARI GONSAL	-	B-1101	46,515
98	NIRAV BHARATKUMAR THAKKAR	JUHI NIRAV THAKKAR	-	B-1102	313,812
99	JAYESHGIRI JAYANTGIRI GOSWAMI	GOSWAMI SADHJANEN JAYESHGIRI	-	B-1103	249,918
100	VIPULKUMAR NANDLAL TRADA	HIRAL VIPULKUMAR TRADA	-	B-1104	145,705
101	MANJULATA AGRAWAL	-	-	B-1201	144,845
102	BASANT VERMA	MADHUR VERMA	-	B-1202	*
103	VIHAR P. TRIVEDI	-	-	B-1203	356,380
104	KANAM B. SHAH	-	-	B-1204	277,732
105	LALIT KHUSHALCHAND SHAH	HEMANGI LALIT SHAH	-	B-1301	*
106	SHAVETA SHARMA	-	-	B-1302	*
107	SANJAY KUMAR SHARMA	NEENA SANJAY SHARMA	-	B-1303	273,871
108	PATEL JITENDRA HARIBHAI	PATEL KHUSHBA JITENDRA	-	B-1304	100,411
109	BHAVIK KORADIA	NINAD KORADIA	-	B-1401	*
110	SUJATA KALPESHBHAI PATEL	KALPESH NAVINBHAI PATEL	-	B-1402	372,543
111	JAYVANT BHASKAR BHAVE	VARSHA JAYVANT BHAVE	-	B-1403	*
112	NAMGIRI GANGARAJU	-	-	B-1404	76,946
113	DEVYANI P SHASTRI	-	-	C-101	288,961
114	VARSHA KEYUR CHAVDA	KEYUR DHARMESHBHAI CHAVDA	-	C-102	170,017
115	KALPANA JITENDRA BHABHA	RUSHABH JITENDRA BHABHA	-	C-103	*
116	NEHA CHAWLA	-	-	C-104	*
117	NAIMISHA NIRAV VYAS	-	-	C-201	118,761
118	PATEL MITTAL S	SANJAY K PATEL	-	C-202	*
119	BEENA SURESH AGRAWAL	-	-	C-203	*
120	SANDIPKUMAR VISHNUBHAI MISTRY	-	-	C-204	48,590
121	ASHOK KUMAR	-	-	C-301	94,355
122	BALVIR SINGH YADAV	TANU BALVIR YADAV	-	C-302	71,348
123	MODI SANKET CHANDRESHBHAI	MODI CHANDRESH NATVARLAL	MODI BHAI SANKETKUMAR	C-303	172,198
124	SMITA AVINASH GADEKAR	-	-	C-304	236,870
125	NITESH THAPA	-	-	C-401	107,884
126	SANDEEPKUMAR KURKEL	PARUL SANDEEP KUREEL	-	C-402	150,513
127	NARESH KUMAR GUPTA	MANJU NARESHKUMAR GUPTA	-	C-403	84,702
128	GAGGAR MANISHA BHAGWATIBHAI	GAGGAR BHAGWATIPRASAD BALURAM	-	C-404	161,582
129	GARIMA TYAGI	YOGESH TYAGI	-	C-501	107,834
130	PATEL PARESHBHAI RANCHOOLAL	-	-	C-502	116,170
131	MITTAL M SHARMA	-	-	C-503	*
132	KRISHNA RANJAN SINDIA	SUPRIYA KUMARI	-	C-504	*
133	AMITA SHIVADEV RAO SHINDE	SHIVADEV RAO SHINDE	-	C-601	108,367
134	GAURANG H PARMAR	SARITA G PARMAR	-	C-602	179,691

135	PRITHIWI PRACHI VISHAL	VISHAL VASUDEV PRITHIWI	-	C-603	300,478
136	RAVI GUPTA	JYOTI GUPTA	-	C-604	281,322
137	PREETI SHUKLA	PIYUSH SHUKLA	-	C-701	106,406
138	PATHAK CHANDRAMAULI PRAWINKUMAR	PATHAK HETAL CHANDRAMAULI	-	C-702	283,584
139	NAMRATA NIPUN SHARMA	NIPUN ATULKUMAR SHARMA	-	C-703	199,392
140	ANKUSH PRAVIN MUKUL	RIDDHIMA ANKUSH MUKUL	-	C-704	*
141	BATUKBHAJ VALLABHBHAJ VASOYA	-	-	C-801	198,988
142	MEETA CHAUHAN	-	-	C-802	248,136
143	SHIVANGEE JAISWAL	-	-	C-803	211,057
144	SEEMA BIRLA	-	-	C-804	128,648
145	SUNIL BHATI	-	-	C-901	94,397
146	DHARMESH P SONI	-	-	C-902	243,812
147	YARIKA WADHWANI	-	-	C-903	105,666
148	ZAHANVI VIPUL GAJJAR	VIPUL SURESH GAJJAR	-	C-904	191,214
149	JINIUS HARSHVADAN SHAH	-	-	C-1001	171,800
150	MANISH KUMAR	PRIYANKA KUMARI	-	C-1002	356,380
151	AMITA AJAY DAMANI	-	-	C-1003	*
152	USHA MEHTA	RAHUL M MEHTA	MEHTA BANDISHKUMAR MANASUKHBHAJ	C-1004	*
153	MENAKA DHAKER	DEENBANDU DHAKER	-	C-1101	74,435
154	PIYUSH LAXMIDAS SETA	HEMA PIYUSH SETA	-	C-1102	301,166
155	MAHARSHI PANKAJ OZA	HIRAL MAHARSHI OZA	-	C-1103	*
156	NEHA NIPUL DOSHI	NIPUL M DOSHI	-	C-1104	262,769
157	MEENA WADHWANI	-	-	C-1201	36,299
158	ILA DINESH PAREKH	HIRAL NIMESH PAREKH	-	C-1202	248,136
159	VINOD GOEL	POOJA AGRAWAL	-	C-1303	*
160	POOJA AGRAWAL	VINOD GOEL	-	C-1204	*
161	GEETA SANJAY VADHEL	-	-	C-1301	233,957
162	RAHUL VAISHNAV	MONIKA RAHUL VAISHNAV	-	C-1302	*
163	MONIKA SURESHBHAJ DEYMRARI	-	-	C-1303	*
164	BANKER ABHINAV BALGOVIND	MEGHA ABHINAV BANKER	-	C-1304	*
165	MEHULKUMAR JETMALAL THAKKAR	KHUSHBU MEHUL THAKKAR	-	D-101	229,487
166	DESAI PANKAJBHAJ HEMUBHAJ	-	-	D-102	*
167	JOSHI VIRALBA MAHESH	-	-	D-103	111,673
168	BHARAT KAPILRAJ MISTRY	-	-	D-104	130,680
169	PRADIP KANIBHAI ZANKAT	UDAYSINH KANIBHAI ZANKAT	-	D-201	*
170	BAKRANIA YOGESH N	JOLLY DEV	-	D-202	*
171	KHAIRNAR SHITAL DINESH	-	-	D-203	275,487
172	TITTYA BHARATKUMAR MANALAL	TITTYA HEFLABEN BHARATKUMAR	-	D-204	245,481
173	MUKUND NATWARLAL PHAFAT	-	-	C-301	*
174	SHWETA SOLANKI	-	-	D-302	15,943
175	GANESH PRAKASH	-	-	D-303	98,305
176	NIKUNJ A TANNA	SAVRI NIKUNKUMAR TANNA	-	D-304	231,189
177	PARTHIV VASANTRAY MEHTA	DHARABEN PARTHIVBHAJ MEHTA	-	D-401	*
178	SUBHASCHANDRA GOPKAM AGRAWAL	-	-	D-402	191,094
179	TEJPALESINH BHARATSINH JADEJA	-	-	D-403	239,217
180	SWARNA SHENDE	ASHWINI BANSOD	-	D-404	171,346
181	PARMAR MINAKI VIPULBHAJ	PARMAR VIPULBHAJ GULABBHAJ	-	D-501	*
182	ANAL DEVANSH SHROFF	KAUMUDINI J SHROFF	-	D-502	11,612
183	DIPAL DINESHBHAJ PATEL	-	-	D-503	93,631
184	RITESH SHARMA	-	-	D-504	107,694

185	RITA J VORA	JAYESH L VORA	-	D-601	165,539
186	SHAH NIRAV RAMESHCHANDRA	-	-	D-602	69,186
187	DEVIDAS MAHEDEORAO CHOUHDARY	BHARTI DEVIDAS CHAUDHARY	-	D-603	233,461
188	KALPESH KUMAR P BORSADIYA	-	-	D-604	107,721
189	JAYANTILAL MAGANLAL PARMAR	MINAXI JAYANTILAL PARMAR	-	D-701	132,227
190	DHAVAL KISHORBHAI RATHOD	PURVI DHAVAL RATHOD	-	D-702	130,385
191	CHETANBHAI C SHIYAL	-	-	D-703	121,386
192	DEEPIKA ARORA	HEMANT ARORA	-	D-704	122,016
193	RATAN MALIRAM SHARMA	-	-	D-801	287,095
194	HARESHKUMAR HARISHANDAS DOSHI	SOBHABEN HARESHKUMAR DOSHI	-	D-802	212,688
195	PRAGNABEN P RATHOD	PRASHANT K RATHOD	-	D-803	105,859
196	NIKHIL HARISH BHAI DHAVSAR	-	-	D-804	*
197	PHILIPS JOHN	PHILOMINA PHILIPS	-	D-901	300,800
198	NIRAV B VADODARIYA	MINA B VADODARIYA	BIPIN B VADODARIYA	D-902	147,321
199	JIGNA CHETANBHAI PATEL	-	-	D-903	248,136
200	PRATIKSHA BALKRUSHNABHAI TANNA	-	-	D-904	219,495
201	RATILAL HARIBHAI DUDHATRA	RAJAN RATILAL DUDHATRA	-	D-1001	358,868
202	PIVUSH UPADHYAY	NISHITHA TRIPATHI	-	D-1002	*
203	DEVEN LAJTKUMAR JOSHI	SHARMILA DEVEN JOSHI	-	D-1003	292,031
204	SANDIP AJIT JAIN	JHALAK SHARMA	-	D-1004	148,490
205	SANGEETA AKHIRAJU THAKKAR HIREN SATISHBHAI	THAKKAR KHUSHU HIREN	-	D-1101	366,504
206	THACKER YATRI VIKRAM	-	-	D-1102	*
207	THACKER YATRI VIKRAM	-	-	D-1103	338,812
208	MOHIT GOYAL	NEHA GOYAL	-	D-1104	226,494
209	RAMESH JAYANTILAL DESAI	-	-	D-1201	248,136
210	GOSWAMI JASH YOGENDRABHAI	-	-	D-1202	248,136
211	TEJAS K SHAH	POONAM TEJAS SHAH	-	D-1203	358,066
212	AJIT ATMARAM JAIN	-	-	D-1204	315,601
213	BENNETT, COLEMAN, & CO. LTD	-	-	D-1301	*
214	MODI NAINABEN NATWARLAL	MODI SAGAR NATVARLAL	-	D-1302	212,688
215	REKHA HIRALBALLABH JOSHI	-	-	D-1303	*
216	BHUKUBHAI D VAGHELA	DEEPIKHA B VAGHELA	-	D-1304	*
217	DEEPAK UPADHYAY	CHINTAL UPADHYAY	-	E-101	322,816
218	GORANTLA SARAT CHANDRA SRIKANT	MADHURI BOLLAPALLI	-	E-102	305,144
219	RATHOD KULDIPSINH BHAVARSINH	RATHOD BINALBA KULDIPSINH	-	E-103	298,984
220	BHAVIN NIRANJAN KUMAR RAVAL	JIGNA BHAVIN KUMAR RAVAL	-	E-104	291,325
221	UTPAL NIRANJAN RAVAL	KRISHNA UTPAL RAVAL	-	E-201	357,443
222	PARTH SHASHIKANT TRIVEDI	-	-	E-202	*
223	AJIT LABHSHANKAR JOSHI	-	-	E-203	77,002
224	MEWADA MANARAM PREMAJI	MEWADA SUKIBEN MANARAM	-	E-204	236,013
225	NIRAV MAHESHKUMAR DAVE	MANSABEN NIRAVEKUMAR DAVE	-	E-301	50,373
226	JYOTIBEN DEEPAKBHAI PATEL	KANAL MITESH PATEL	PATEL MAULIKA DEEPAKBHAI	E-302	253,411
227	DINESH VASUDEV MULCHANDANI	HARSHITA DINESH MULCHANDANI	-	E-303	242,819
228	SUNIL JHA	INDU JHA	-	E-304	239,257
229	NIHAR NIRANJAN RAVAL	NEHA NIHAR RAVAL	-	E-401	357,443

230	VIVEK M. KANTARIYA	-	-	E-402	86,745
231	SHARADKUMAR G. KOTHARI	REKHA SHARAD KOTHARI	-	E-403	357,250
232	CHANDRAJEET KH MAHARAJ	KAVITA MAHARAJ	-	E-404	138,239
233	AMRANIYA CHIRAG KISHORBHAI	-	-	E-501	362,760
234	SUDHIR VIDYARATAN VASWANI	VEERAT SUDHIR VASWANI	RAVI S VASWANI	E-502	218,335
235	SANJAYBHAI BABULAL PANDYA	JIGNABEN SANJAYBHAI PANDYA	-	E-503	342,073
236	ARVINDBHAI B RAVIYA	ASMITABEN RAVIYA	-	E-504	146,320
237	DOSHI GARGI PULINBHAI	-	-	E-601	212,688
238	VIKRANT LAKHDHIRSINH JADEJA	ANSUYA LAKHDHIRSINH JADEJA	-	E-602	277,590
239	RONAK BABUBHAI BHALALA	-	-	E-603	84,654
240	JAYSINH RAJESHINH RAJPUT	RAJESHINH PURSHOTTAMDAS RAJPUT	-	E-604	315,602
241	KRUTI TRIVEDI PATEL	-	-	E-701	364,186
242	RONAK RAJENDRA SHAH	NEEPA RONAK SHAH	-	E-702	252,921
243	PRAJYOT AJIT KULKARNI	-	-	E-703	269,476
244	MAHENDRAKUMAR NATVARLAL SHAH	-	-	E-704	*
245	PRAJAPATI MINAKI MANISHBHAI	PRAJAPATI MANISHBHAI RAMESHBHAI	-	E-801	248,136
246	RATILAL PURSHOTTAM VASANI	AJAYKUMAR RATILAL VASANI	-	E-802	248,136
247	HEMANG P MANIAR	PREETI H MANIAR	-	E-803	351,335
248	SHAH ANLIJ	SHAH ZARNA	-	E-804	346,143
249	SUJEET VISHWASRAO NARWADE	RAJASHREE NARWADE	-	E-901	301,379
250	GOPALBHAI BHAGWANIBHAI PATEL	VARSHABEN GOPALBHAI PATEL	-	E-902	285,427
251	RESHMI SAMEER VALIPARAMBIL	-	-	E-903	53,733
252	SHAILESH KUMAR C GIRI	POONAM GIRI	-	E-904	147,104
253	SUSHANT HEMROM	-	-	E-1001	370,006
254	PRASHANT JAYANTIBHAI MAJUMDAR	PREETI PRASHANT MAJUMDAR	-	E-1002	190,717
255	DHARMISTHA RUPESH HALANI	RUPESH RISHOCHANDRA HALANI	-	E-1003	*
256	SHARADCHANDRA HARGOVINDAS BOSAMIYA	PRATIK SURESHKUMAR BOSMIYA	-	E-1004	*
257	HITESHKUMAR	YOZNA HITESH SARDA	-	E-1101	*
258	PREETI PRASHANT MAJUMDAR	PRASHANT JAYANTIBHAI MAJUMDAR	-	E-1102	149,670
259	AKSHAY KANODIA	-	-	E-1103	305,420
260	YOGESH KANODIA	-	-	E-1104	305,420
261	ALAPBEN A RAJPUT	-	-	E-1201	226,867
262	MANISH SHARMA	-	-	E-1202	*
263	INDIRA SHRISH UDSEHI	SORIAL SHRISH UDSEHI	-	E-1203	*
264	PANCHAL SURESHKUMAR K	-	-	E-1204	*
265	SURABHI SIRHA	-	-	GF-01	*
GRAND TOTAL AMOUNT OF ITC BENEFIT TO BE PASSED ON					4,52,79,754/-

*:-No amount is indicated in the DGAP's report dated 27.11.2020 (Annexure-12).

