

BEFORE THE NATIONAL ANTI-PROFITEERING AUTHORITY

UNDER THE CENTRAL GOODS & SERVICES TAX ACT, 2017

Case No. : 72/2022

Date of Institution : 01.11.2021

Date of Order : 13.09.2022

In the matter of:

1. Sh. Karunakar Singh, 001, Gara Katara Singh Villa, Shankargarh, Allahabad, Uttar Pradesh.
2. Sh. Gaurav Mishra, gauravmishra666@gmail.com
3. Sh. Shailendra Singh, shailendra093@gmail.com
4. Sh. Gajendra Kumar, lavishbhati2007@gmail.com
5. Sh. Gaurav Srivastav, gaurav2924@gmail.com
6. Sh. Saroj Mohan Jha, jha146@gmail.com
7. Sh. Aginvesh Mishra, ani05122006@gmail.com
8. Sh. Deepjyoti Acharjee, deepacharjee@gmail.com
9. Sh. Love Kumar, kumarlove630@gmail.com
10. Sh. Ankit Anand, ankit.tech@outlook.com
11. Sh. Ram Sharan Sah, jyoti_ram2004@yahoo.co.in
12. 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 Prasu Infrabuild Pvt. Ltd, GH-05B, Sector-16B, Greater Noida West, Uttar Pradesh, having Registered Office at KA-43, Kaushambi, Near Wave Cinema, Ghaziabad, Uttar Pradesh.

Respondent

Quorum:-

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

Present: -

1. None for the Applicant No 1.
2. Sh. Gaurav Mishra, Sh. Shailendra Singh, Sh. Gajendra Kumar, Sh. Gaurav Srivastav, Sh. Saroj Mohan Jha, Sh. Aginvesh Mishra, Sh. Deepjyoti Acharjee, Sh. Love Kumar, Sh. Ankit Anand, Sh. Ram Sharan Sah, the Applicant No. 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 respectively in person.
3. None for the DGAP and the Respondent.



ORDER

1. The present Report dated 29.10.2021 has been received by National Anti-Profiteering Authority (**NAA or the Authority**) from the Applicant No. 12 i.e. the DGAP after detailed investigation under Rule 129(6) of the Central Goods & Service Tax (**CGST**) Rules, 2017. The brief facts of the present case are that the Standing Committee on Anti-profiteering, received an application under Rule 128 of the CGST Rules, 2017 filed by the Applicant No. 1 alleging profiteering in respect of construction service supplied by the Respondent. The Applicant No. 1 has submitted that he had booked Unit No. 2117 in the Respondent's project "**SKA Green Arch**", Greater Noida (West) under Prime Minister Awas Yojana (PMAY) and alleged that the Respondent had charged GST @12%. In his application, the Applicant No. 1 also submitted that MRP of the flat had increased and the Respondent had not passed on the benefit of ITC to him by way of commensurate reduction in the price on introduction of GST w.e.f. 01.07.2017, in terms of Section 171 of the CGST Act, 2017.
2. The DGAP in his Report dated 29.10.2021, inter-alia stated that:-
 - i. The said application was examined by the Standing Committee on Anti-profiteering, in its meeting, the minutes of which were received in the DGAP's office on 15.10.2020, whereby it was decided to forward the same to the DGAP to conduct a detailed investigation in the matter. Accordingly, investigation was initiated to collect evidence necessary to determine whether the benefit of ITC had been passed on by the Respondent to his customers in respect of construction service supplied by the Respondent.
 - ii. On receipt of the reference from the Standing Committee on Anti-profiteering, a notice under Rule 129 of the Rules was issued by the DGAP on 06.11.2020, calling upon the Respondent to reply as to whether he admitted that the benefit of ITC had not been passed on to his customers 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. Vide the said notice, the Respondent was also given an opportunity to inspect the non-confidential evidences/information furnished by the Applicant No. 1, during the period 25.11.2020 to 26.11.2020. The Respondent availed of the said opportunity and inspected the said documents on 07.01.2021.

- iii. Vide e-mail dated 24.09.2021, the Applicant No. 1 was also afforded an opportunity to inspect the non-confidential documents/reply furnished by the Respondent on 27.09.2021. However, the Applicant No. 1 did not avail this opportunity.
- iv. The period covered by the current investigation was from 01.07.2017 to 31.10.2020.
- v. The time limit to complete the investigation was 14.04.2021 in terms of Rule 129(6) of the Rules. However, due to force majeure caused in the light of Covid-19 pandemic, the investigation could not be completed on or before the above date. Further, Hon'ble Supreme Court of India passed an Order dated 08.03.2021 in *Suo Motu Writ Petition (Civil) No. 3 of 2020* wherein, it was stated that "in cases where the limitation would have expired during the period between 15.03.2020 till 14.03.2021, notwithstanding the actual balance period of limitation remaining, all persons shall have a limitation period of 90 days from 15.03.2021. In the event the actual balance period of limitation remaining, with effect from 15.03.2021, is greater than 90 days, that longer period shall apply". The above relief has been extended and the period from 14.03.2021 till further orders also stands excluded in computing the limitation period as per the Hon'ble Supreme Court's Order dated 27.04.2021 passed in *Miscellaneous Application No. 665/2021 in SMW(C) No. 3/2020*. Further, the above relief had been extended and the period from 02.10.2021 shall have limitation period of 90 days from 03.10.2021 as per the Hon'ble

Supreme Court's Order dated 23.09.2021 passed in Miscellaneous Application No. 665/2021 in SMW(C) No. 3/2020.

vi. In response to the notice dated 06.11.2020 and subsequent reminders, emails and summons issued by the DGAP to the Respondent, the Respondent replied and submitted documents/information vide letters and e-mails dated 08.01.2021, 25.01.2021, 25.02.2021, 10.03.2021, 16.03.2021, 06.04.2021, 28.06.2021, 14.07.2021, 15.07.2021, 23.07.2021, 29.07.2021, 09.08.2021, 18.08.2021, 19.09.2021, 21.09.2021 and 27.10.2021. The submissions of the Respondent were summed up as follows: -

- a. The proceedings were initiated on the basis of an application received from the Applicant No. 1. The said Applicant No. 1 had purchased one flat in the project. Hence, the investigation could not go beyond the Applicant No. 1 and cover other customers also who had not questioned the benefit passed on to them.
- b. The Applicant No. 1 had booked flat after more than one year of implementation of GST, so the provisions of Section 171 of the CGST Act, 2017 were not applicable.
- c. Since, there was reduction in rate of GST from 12% (after abatement of Land cost) to 8% (after abatement of Land cost), vide Notification No. 01/2018 dated 25.01.2018 under provision of GST law, the Applicant No. 1 had been charged GST @ 8% only. So, the benefit of reduction had already been given to the buyers. Hence, the provision of Anti-Profiteering did not apply in his case.
- d. The project "SKA Green Arch" was not an approved affordable segment EWS category Project. The benefit of reduced rate of GST for the project was subject to individuals' eligibility under the Credit Linked Subsidy Scheme (CLSS) announced by the Government. In the case of the Applicant No. 1, the flat was booked on 03.03.2018 and the benefit of CLSS was availed.

Under this scheme, the beneficiary had to apply Housing loan with Primary Lending Institutions (PLI) after booking of a flat and Central Nodal Agencies (CAN) to verify the eligibility & terms of the policy, and after the satisfaction of the eligibility they could release interest subsidy amount to the PLI and then it would be credited to the loan account of the borrower. Further, the Ministry of Housing and Urban Affairs had told the PLI to issue a certificate addressed to the beneficiary with a copy to the builder, certifying that the borrower was a beneficiary of the CLSS. On the basis of the certificate, the Respondent might charge reduced rate of GST as applicable under PMAY. From the above fact, it was clear that while the Applicant No. 1 had booked the flat, the reduced rate of GST could not be charged until the CLSS certificate was received, as he was not fulfilling the conditions of the CLSS scheme at the time of booking of the flat. The Applicant No. 1 had received the subsidy in his loan account on 22.11.2019. This shows that the certificate was received after this date. The Applicant No. 1 was entitled to the benefit of reduced rate on or after 22.11.2019, therefore his allegation that he had booked the unit under PMAY was baseless and false. The Respondent had charged GST @ 12% till the approval of the benefit of CLSS to the Applicant No. 1 and as and when the certificate was issued by the PLI, the Respondent had started to charge GST @ 8% only which was reduced rate of GST applicable under PMAY. Accordingly, the Respondent had refunded through banking channel the difference of 4% of Rs. 1,39,932/- which was charged in excess of 8% of GST on or before the CLSS certificate.

- e. The Respondent had been constructing a residential project "SKA Green Arch" in two phases with single RERA registration. In the project, there were four towers and commercial spaces.

- f. In the first phase, there were two towers (Aster Tower and Orchid Tower) & commercial spaces which had been constructed by the Respondent and the completion certificate of phase one had been issued by the competent authority on 18.09.2019.
- g. In the second phase, the Respondent was constructing two towers namely, Tulip Tower and Zinnia Tower and construction as well as booking of flat of these towers had been started after 31.12.2017 i.e., post GST regime. No completion certificate has been received for the said phase till date. Since, Phase-2 of the project consisting of two towers namely Tulip and Zinnia was not under construction on or before 01.07.2017 and no purchase, construction or sale activities were started for Phase-2, hence, there was neither any sale nor any ITC was available for the said phase on or before GST implementation i.e., 01.07.2017. The above fact could be verified from the documents uploaded by the Respondent from time to time on RERA website like progress report of the project, sales detail of the project and Chartered Engineers certificate etc., the contractor's Work Order issued for the said phase and 1st RA bill provided by the contractor for those Towers and from the 1st booking for the Phase-2 where it was clearly mentioned in the payment plan which was part of the agreement that when raft work would be started, the buyer had to pay certain percentage of the total sale value. The Respondent had raised invoices for the same milestone on 17.07.2018. The Contractors bill of the said work had been issued on 06.10.2018. This clearly showed that the raft work which was the foundation work of a Tower had started after 17.07.2018 which was post GST regime.
- h. The Respondent had been providing service for construction of residential service and other services like sale of RMC, society

maintenance services etc. during the period under consideration. The Respondent was availing input credit for the said services & sale.

- i. The Respondent had taken input credit for services, which was used for providing taxable services under head construction of residential complex. Following were some examples of the services with rate of tax, pre-GST & post-GST.

Sl. No.	Particulars	Rate during Service Tax Regime	Post GST Regime
1	Labour Contractors	15%	18%
2	Architect Service	15%	18%
3	Brokerage Service	15%	18%
4	Work Contract Services	6%	18%

In connection with the said services, the Respondent had paid taxes in excess of service tax leviable in GST regime and availed input tax credit. Therefore, excess tax paid must be considered from the Respondent's cost and taken input credit as compared to service tax regime for calculating profiteering.

- j. The Respondent had been paying VAT/Sales Tax on purchase of goods for which input credit was not available to the Respondent for providing services under head of construction of residential services but the Respondent had been claiming the said VAT/Sales Tax as expenditure of the Respondent and getting benefit of Income Tax at applicable rate for the Respondent. Now the Respondent was entitled to claim input credit for GST paid on purchase of good, so the Respondent was not eligible for claiming expenses of GST paid on purchase. Therefore, for calculation of profiteering, the income tax benefit forgone by the Respondent must be considered.
- vii. Vide the aforementioned letters & emails, the Respondent submitted

the following documents/ information:

- a. Copies of GSTR-1 Returns for the period July, 2017 to October, 2020.
 - b. Copies of GSTR-3B Returns for the period July, 2017 to October, 2020.
 - c. Copies of Tran-1 Returns for period July, 2017 to December, 2017.
 - d. Copies of VAT & ST-3 Returns for the period April, 2016 to June, 2017.
 - e. Copy of Balance Sheets for FY 2016-17 to FY 2019-20.
 - f. Copy of project reports submitted to RERA.
 - g. Copy of registered deed for purchase of land.
 - h. Copy of Occupancy Certificate for Phase I.
 - i. Copy of allotment letters and demand letters issued to Applicant and other home buyers.
 - j. Details of sold and unsold units.
 - k. Details of applicable tax rates, pre-GST and post-GST.
 - l. Details of input and output VAT, Service Tax and GST for the project "SKA Green Arch" during the period April 2016 to October 2020.
 - m. Copies of cheques dated 14.09.2020 and 20.09.2020, issued by the Respondent to the Applicant No. 1 for refund of Rs. 1,39,932/-.
 - n. Summary of Input Tax Credit.
 - o. List of home buyers in the project "**SKA Green Arch**".
- viii. Vide the notice dated 06.11.2020, the Respondent was informed that if any information/documents was provided on confidential basis, in terms of Rule 130 of the Rules, a non-confidential summary of such information/documents was required to be furnished. The Respondent claimed that all information/documents submitted by him were to be treated as confidential.

- ix. The above said reference from the Standing Committee on Anti-profiteering along with subject application of the Applicant No. 1, various replies of the Respondent and the documents/evidences on record had been carefully examined.
- x. Further vide Para 5 of Schedule-III of the CGST Act, 2017 (Activities or Transactions which should be treated neither as a supply of goods nor a supply of services) which reads as *"Sale of land and, subject to clause (b) of paragraph 5 of Schedule II, sale of building"*. Further, clause (b) of Paragraph 5 of Schedule II of the CGST Act, 2017 reads as *"(b) construction of a complex, building, civil structure or a part thereof, including a complex or building intended for sale to a buyer, wholly or partly, except where the entire consideration has been received after issuance of completion certificate, where required, by the competent authority or after his first occupation, whichever is earlier"*. Thus, the ITC pertaining to the residential units which was under construction but not sold was provisional ITC which might be required to be reversed by the Respondent, if such units remain unsold at the time of issue of the completion certificate, in terms of Section 17(2) & Section 17(3) of the CGST Act, 2017, which read as under:

Section 17 (2) *"Where the goods or services or both are used by the registered person partly for effecting taxable supplies including zero-rated supplies under this Act or under the Integrated Goods and Services Tax Act and partly for effecting exempt supplies under the said Acts, the amount of credit shall be restricted to so much of the input tax as is attributable to the said taxable supplies including zero-rated supplies"*.

Section 17 (3) *"The value of exempt supply under sub-section (2) shall be such as may be prescribed and shall include supplies on which the recipient is liable to pay tax on reverse charge basis, transactions in securities, sale of land and, subject to clause (b) of paragraph 5 of Schedule II, sale of building"*.

Therefore, ITC pertaining to the unsold units was outside the scope of this investigation and the Respondent was required to recalibrate the selling price of such units to be sold to the prospective buyers by

considering the proportionate additional ITC available to him post-GST.

- xi. The Respondent was a Developer and was engaged in construction of building. He was earlier registered as an assessee with VAT & Service Tax Department, upto 30.06.2017. Thereafter he was registered with GST Department vide Registration No 09AAGCP9220N1ZW for providing taxable service under the category of construction services. Vide his above submissions, the Respondent contended that the proceedings were initiated on the basis of an application received from the Applicant No. 1. The said Applicant No. 1 had purchased one flat in the Project. Hence, the investigation could not go beyond the Applicant No. 1 and cover other customers also who had not questioned the benefit passed on to them. In this regard, it was observed that Section 171 (1) of the CGST Act, 2017 envisage that *"Any reduction in rate of tax on any supply of goods or services or the benefit of ITC shall be passed on to the recipient by way of commensurate reduction in prices."* It was clear from perusal of the above provision that it mentioned "benefit of ITC shall be passed on to the recipient" which did not mean that the benefit of ITC was to be taken only for the applicant or the complainant. Further, the above Section mentions "any supply" i.e., each taxable supply made to each recipient thereby clearly indicating that every customer/recipient was eligible to get his due benefit. Therefore, it was clear that the intent of the statute was to ensure that the benefit of any reduction in the rate of tax or the benefit of ITC had to be passed on to the each and every recipient by way of commensurate reduction in price. In other words, every recipient of goods or services had to get the due benefit from the supplier and hence, this benefit had to be calculated for each and every recipient/customer and therefore, in the current investigation all the eligible home buyers were included.

- xii. Further, the Respondent contended that the project "SKA Green Arch" was not an approved affordable housing project and therefore the benefit of reduced rate of GST for the project was subject to individuals' eligibility under the Credit Linked Subsidy Scheme (CLSS) announced by the Government. In the case of the Applicant No. 1, the flat was booked on 03.03.2018 and the Applicant No. 1 had received the subsidy in his loan account on 22.11.2019 and hence the Applicant No. 1 was entitled to the benefit of reduced rate on or after 22.11.2019. Therefore, his allegation that he had booked the unit under PMAY was baseless and false. The Respondent had charged GST @ 12% till the approval of the benefit of CLSS to the Applicant No. 1 and when the certificate was issued by the PLI, the Respondent had started to charge GST @ 8% only which was reduced rate of GST applicable under PMAY. Accordingly, the Respondent had refunded through banking channel the difference of 4% of Rs. 1,39,932/- which was charged in excess of 8% of GST on or before the CLSS certificate. The contention of the Respondent appeared to be correct and it was also observed that the Respondent had returned the due amount to the Applicant No. 1 which had also been confirmed by the Applicant No. 1. Hence, the issue of charging GST @12% as alleged by the Applicant No. 1 stood complied with by the Respondent.
- xiii. The Respondent contended that Phase II of the Project was launched after implementation of GST i.e., 01.07.2017 and booking of units was made only in the GST regime and also submitted various documents in support of his claim. On scrutiny of the documents, it appeared that the Phase II of the Project was launched in GST regime. However, it was also observed that the Respondent applied for single RERA registration in pre-GST period for the entire Project wherein the Respondent submitted details of both the Phases of the Project. Since, for both the Phases there was single RERA registration which was obtained in pre-GST period. Phase II could not be spared from

the current investigation on the mere basis that the same was launched in post-GST period. Hence, the contention of the Respondent in this regard was not considered and investigation was carried out for both the phases of the Project.

- xiv. The Respondent had also contended that he had paid taxes in excess in GST regime as compared to Service Tax regime. In this regard, it was observed that the Respondent had claimed that his cost has increased due to increase in rate of tax on his input services. However, the Respondent had not provided any data to quantify the extra cost incurred in GST period to be adjusted against the amount of profiteering.
- xv. The Respondent had also claimed that he had been paying VAT/Sales Tax on purchase of goods for which input credit was not available to the Respondent for providing services under head of construction of residential services but the Respondent had been claiming the said VAT/Sales Tax as expenditure and getting benefit of Income Tax at applicable rate. Now, the Respondent was entitled to claim input credit for GST paid on purchase of good, so the Respondent was not eligible for claiming expenses of GST paid on purchase. Therefore, for calculation of profiteering, the income tax benefit forgone by the Respondent must be considered. In this regard, it was pertinent to mention that even the passing on of additional benefit on account of ITC to homebuyers in the GST period could also be reckoned as expenditure and commensurate benefit under the Income Tax Act be availed by the Respondent. Therefore, the contention of the Respondent was not acceptable.
- xvi. As regards the allegation of profiteering, it was observed 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 the input services (CENVAT credit of Central Excise duty was not available) in respect of the units for the Project "**SKA Green Arch**" sold by him.

However, it was also observed that the Respondent was not eligible to avail ITC of VAT paid on the inputs. Further, post-GST, the Respondent was eligible to avail ITC of GST paid on all the inputs and input services. From the data submitted by the Respondent covering the period April, 2016 to October, 2020, the details of the input tax credits availed by him, his turnovers from the Project “**SKA Green Arch**” the ratios of ITCs to turnovers, during the pre-GST (April, 2016 to June, 2017) and post-GST (July, 2017 to December, 2020) periods, are tabulated in Table-A below.

Table-A

Sr.No	Particulars	Total (Pre-GST) April, 2016 to June, 2017	Total (July, 2017 to October, 2020)
1	CENVAT of Service Tax Paid on Input Services used for flats (A)	58,16,432	0
2	Input Tax Credit of VAT Paid on Purchase of Inputs (B)	0	0
3	Total GST ITC Available (C)	0	24,26,46,239
4	Total CENVAT/Input Tax Credit Available (D)= (A+B or C)	58,16,432	24,26,46,239
5	Turnover for Flats as per Home Buyers List (E)	16,87,65,307	2,35,60,06,678
6	Total Saleable Area (in SQF) (F)	11,20,148	11,20,148
7	Total Sold Area (in SQF) relevant to turnover (G)	2,46,908	9,93,305
8	Relevant ITC [(H)= (B)*(G)/(F)]	12,82,084	21,51,69,533
Ratio of ITC Post-GST [(I)=(H)/(E)]		0.76%	9.13%

From the above Table- ‘A’, it was clear 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 0.76% and during the post-GST period (July, 2017 to October, 2021), it was 9.13% in Project “**SKA Green Arch**”. This clearly confirmed that in post-GST, the Respondent had been benefited with additional ITC to the tune of 8.37% [9.13% (-) 0.76%] of the turnover.

- xvii. The Respondent had claimed that the price quoted to the post GST customers was inclusive of the benefit of ITC under GST Laws. The

application form which was signed by all home buyers mentions as the following:

“The Cost of Apartment/Unit was arrived after reduction on account of GST ITC Benefit.”

However, in order to examine this aspect, all application forms in respect to all the buyers who had booked flats in the post GST period were required to be scrutinized. As per the homebuyers list submitted by the Respondent it was observed that 642 number of buyers whose turnover was Rs. 1,84,83,74,531 had purchased the Apartments/Units from the Respondent in post-GST period. As such all the Application Forms in respect of said 642 home buyers, which were signed by the buyers had been submitted by the Respondent. All such Application Forms/Agreements are annexed as Annexure-22 with the Report.

Therefore, it was observed that the Respondent's claim that the benefit of ITC provided as under Section 171 of CGST Act, 2017 was already considered in the consideration value which was mentioned in all the builder buyer's agreement in respect of post GST buyers, was correct only to extent of 642 number of buyers whose documents were submitted by the Respondent and in which the aforesaid clause was clearly indicated. Accordingly, while computing the profiteering amount, only the turnover in respect of 642 buyers who had booked flats in the post-GST period and whose documents clearly mentioned the aforesaid clause, were excluded from calculation of profiteering as mentioned in Table-B below.

- xviii. It was observed that the Central Government, on the recommendation of the GST Council, had levied 18% GST (effective rate was 12% in view of 1/3rd abatement for land value) on construction service, vide Notification No. 11/2017-Central Tax (Rate) dated 28.06. 2017. The effective GST rate was 12% for flats. Accordingly, on the basis of the figures contained in Table- 'A' above, the comparative figures of the

ratio of ITCs availed/available to the turnovers in the pre-GST and post-GST periods as well as the turnover, the recalibrated base price and the excess realization (profiteering) during the post-GST period, were tabulated in Table-B below:

Table-B

Sr. No.	Particulars		
1	Period	A	July, 2017 to October, 2020
2	Output GST rate (%)	B	12
3	Ratio of CENVAT credit/ ITC to Total Turnover as per table - 'B' above (%)	C	9.13%/0.76%
4	Increase in ITC availed post-GST (%)	D= 9.13% less 0.76%	8.37%
5	<u>Analysis of Increase in input tax credit:</u>		
6	Base Price raised during July, 2017 to October, 2020 (Rs.)	E	2,35,60,06,678
7	Less: Demand raised and advances raised during 1st July, 2017 to October, 2020 (Rs.) (Flats sold after 01.07.2017 as per documents of 642 buyers)	F	1,84,83,74,531
8	Final Base Price raised during 1st July, 2017 to October, 2020 (Rs.)	G= E-F	50,76,32,147
9	GST raised over Base Price (Rs.)	H= G*B	6,09,15,858
10	Total Demand raised	I=G+H	56,85,48,005
11	Recalibrated Base Price	J= G*(1-D) or 91.63% of G	46,51,43,336
12	GST @12%	K = J* B	5,58,17,200
13	Commensurate demand price	L = J + K	52,09,60,537
14	Excess Collection of Demand or Profiteering Amount	M= I-L	4,75,87,468

- xix. From Table- 'B' above, it was clear that the additional ITC of 8.37% of the turnover should have resulted in the 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 such additional ITC was required to be passed on to the recipients. It was evident from the above calculation explained in Table-B 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 flat/home buyers in respect of the flats sold by the Respondent during the period 01.07.2017 to 31.10.2020, the benefit of ITC that needed to be passed on by the Respondent to the buyers of flats came to Rs. 4,75,87,468/- which included 12% GST on the base amount of Rs. 4,24,88,811/-. The flat buyers and unit no. wise break-up of this amount was given in Annexure-24 of the Report.

- xx. The Respondent in his submissions stated that he had passed on the additional benefit of ITC of Rs. 2,41,18,611/- to 206 home buyers who booked the units before implementation of GST i.e., 01.07.2017, which had accrued after implementation of GST. He had also submitted details of home buyers and amount passed on to the individual home buyers. In order to cross check the claim of the Respondent, e-mails were sent to the 206 buyers. Replies from only 18 Homebuyers had been received and out of 18 homebuyers, 14 had confirmed that benefit of GST/Input Tax Credit had been received, 5 had denied that benefit of GST/Input Tax Credit had been received and in respect of 187 buyers, no reply was received. The details of confirmation of the receipt of payment received through e-mails were enclosed in Annexure-25 of the Report. Hence, the contention of Respondent that benefit to all the homebuyers had been passed on could not be accepted in respect of all homebuyers. A summary of benefit of ITC required to be passed on and the ITC benefit claimed to had been passed on to the Applicant No. 1 and other home buyers, was tabulated in Table- 'C' below: -

Table-C

Sr. No.	Category of Customers	No. of Units	Area (in Sqf)	Amount Received Post GST	Profiteering Amt. as per Annex-24 of the Report	Benefit claimed to had been passed on by the Respondent	Difference	Remark
A	B	C	D	E	F	G	H=F-G	I
1	Buyers who confirmed through email	14	18,380	3,76,89,100	35,33,127	16,72,564	18,60,563	Further Benefit to be passed on as per Annex-26 of the Report.
2	Buyers who denied through email	5	5,660	1,22,38,720	11,47,307	6,27,749	11,47,307	Benefit to be pass on as per Annex-27 of the Report.
3	Buyers from whom no email/reply received	187	2,22,868	45,77,04,327	4,29,07,034	2,18,18,298	4,29,07,034	Further Benefit to be Passed on as per Annex-28 of the Report.
4	Post GST Buyers	642	7,46,397	1,84,83,74,531	0	0	0	Annex-29 of the Report. of the Report.
5	Post OC Sales	29	29,337	9,64,99,583	0	0	0	Annex-30 of the Report..
6	Unsold Units	92	97,506	0	0	0	0	
Total		969	11,20,148	2,45,25,06,261	4,75,87,468	2,41,18,611	4,59,14,904	

From the above Table "C", it was observed that the benefit was to be passed on by the Respondent to 206 homebuyers (Sr. 1, 2 & 3 of above Table-'C') by an amount of Rs. 4,59,14,904/-. The details of these amounts were given in Annexures-26, 27 & 28 of the Report.

3. Therefore, the DGAP concluded that:-

- i. On the basis of above, it had been observed that the Respondent had profited an amount of Rs. 4,75,87,468/- (inclusive of GST), after implementation of GST. The profited amount was 8.37% of the turnover. The Respondent had also claimed that he had passed on the benefit of ITC amounting to Rs. 2,41,18,611/- to the home buyers.

On verification, 14 buyers had confirmed that benefit of ITC of GST

had been received, 5 had denied and rest 187 buyers did not respond. Therefore, after considering the response of the 14 buyers who had confirmed the receipt of benefit of ITC of GST from the Respondent, it was observed that the Respondent was yet to pass on an additional amount of Rs. 4,59,14,904/- as mentioned at Sr. 1, 2 & 3 of the Table-C which included both the profiteered amount @ 8.37% of the base price and GST on the said profiteered amount from the 206 flat buyers. These 206 recipients were identifiable as per the documents provided by the Respondent, giving the names along with unit allotted to such recipients and hence, the Respondent was required to pass on the benefit of ITC of GST to these buyers. Based on the details of the outward supply of Construction services submitted by the Respondent, it was also observed that the Respondent has supplied construction services in the State of Uttar Pradesh only.

ii. As aforementioned, the present investigation covered the period from 01.07.2017 to 31.10.2020. Profiteering, if any, for the period post October, 2020 had not been examined as the exact quantum of ITC that would be available to the Respondent in future could not be determined at this stage, when the construction of the Project was yet to be completed.

4. The above Report was carefully considered by this Authority and it was decided to allow the Applicant No. 1 and the Respondent to file their consolidated written submissions by 15.03.2022. A notice dated 25.02.2022 was issued to the Respondent to explain why the Report dated 29.10.2021 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 and penalty under Section 171 (3A) of the CGST Act, 2017 read with Rule 133(3)(d) of the CGST Rules, 2017 should not be imposed.
5. Further, a number of complaints were received against the Respondent for the same Project i.e. "SKA Green Arch" and the complainants requested

to be considered as Applicants in the present case. In this regard, the Authority ordered that all the complainants be added as Applicants in the present case. Accordingly, the Applicants No. 2 to 11 were added as the applicants in the present case.

6. The Respondent filed his written submissions vide letter dated 13.04.2022 in which, inter-alia, he submitted:-

- i. That the second phase of the project namely; 'SKA Green Arch' could not be included for the purpose of calculation of profiteering amount as no activity viz. construction, purchase, sale etc., had been done by the Respondent w.r.t. the said project during pre-GST regime. It was submitted that considering the submissions made above, the total profiteering amount as calculated by DGAP to the tune of Rs. 4,75,87,468/- would be reduced to Rs. 2,70,16,059/-.
- ii. That the Respondent had rightly passed on the due benefit of commensurate reduction in prices to his buyers/customers to the tune of Rs. 2,41,18,611/-.
- iii. That the confirmation regarding non-receipt of due benefit from the buyers/customers should be subjected to a proper verification and merely on the basis of negative confirmation it cannot be held that the Respondent had not passed on the due benefits to them. It was submitted that keeping in view the fact that Respondent had already passed on the eligible benefit to each and every buyer (as submitted above), the Authority must conduct a proper verification of the facts and relevant records related to the buyers/customers who did not respond/reply, so that it could be ascertained that whether they were in receipt of the due benefit or not.
- iv. That comparison of ratios of ITCs to turnovers of pre-GST regime with GST regime was not the correct mechanism for calculation of the profiteering amount.
- v. That in absence of specified procedure and mechanism of calculation of profiteering, the proceedings initiated against the Respondent were

arbitrary and thus liable to be dropped. In this regard, reliance was placed on the cases of Eternit Everest Ltd. Vs. UOI, 1997 (89) E.L.T. 28 (Mad.).

- vi. Without prejudice to above, investigation proceedings cannot go beyond the application submitted by the Applicant No. 1.
 - vii. Without prejudice to above, the alleged profiteering amount had been incorrectly inflated by adding GST and the same was not sustainable.
7. Copy of the Respondent's submissions dated 13.04.2022 was supplied to the Applicants and the DGAP for their replies and clarifications under Rule 133(2A) of the CGST Rules, 2017. The Applicant No. 2 & 3 by e-mail dated 03.05.2022 have filed their submissions against the Respondent's submissions dated 13.04.2022 vide which, inter-alia, they stated:-
- i. That with reference to page No. 6 of the Respondent's submissions, the Respondent objected to ratios used in the DGAP's Report for calculating profiteering amount, however if Respondent believed that it had applied accurate and logical method to compute amount of refund to customer, then why benefit was not received by all customers. The Applicants felt that the Respondent had been partial towards few customers only. It was also claimed that no amount was retained by the Respondent and same was paid to tax authorities, Either all amounts should have been refunded or all amounts should have been paid to authority. The Respondent's policy seemed to be made in contradiction of CGST Act, 2017 and contained ambiguity, which failed to fulfil the purpose. Why advance ruling was not obtained from department, if the Respondent believed that no formulae/ratio or criteria was defined by law to compute the profiteered amount. Why wrong practice was followed and only few customers got benefit. There seemed malafied intention of the Respondent.
 - ii. That with reference to page No. 14 of the Respondent's submissions, the Respondent claimed to have passed on the benefit by way of

credit notes, but the Applicants had not received any credit note, the Applicants had paid entire amount as per agreement and did not receive any benefit in form of credit note and documents pertaining to this had been already submitted.

iii. That with reference to page No. 32 of the Respondent's submissions, claiming that amount of GST was not retained by the Respondent and same was paid to the Revenue authority. Firstly, whether the amount had been actually paid or not was again matter of further investigation and what kind of ITC (eligible or ineligible) had been used to pay the outward tax liability in respect of concerned supply. Secondly, negligence at the end of the Respondent should not be borne by end customer, as intention of law was to benefit the end customer, hence the Respondent should be held liable to refund the hard earned money of customers.

iv. With reference to page No. 33 of the Respondent's submissions, by referring to section 54, and shifting burden on to government to refund the taxes to customer was not tenable as burden to refund the taxes for reduction in prices lies on supplier of service/goods.

8. Further, the DGAP by letter dated 09.05.2022 filed his clarifications vide which the DGAP has clarified:-

i. That in the erstwhile pre-GST regime, 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 ITC of some taxes was not being allowed in the erstwhile tax regime. For example, the ITC of Central Sales Tax, which was being collected and appropriated by the States, was not admissible. Similarly, 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 with effect from 01.07.2017, all these taxes got subsumed in the GST and the ITC of GST became available in respect of all goods and services, unless specifically denied. Broadly, the additional benefit of ITC in the GST regime would be limited to those input taxes, the credit of which was not allowed in the pre-GST regime, but allowed in the GST regime. This additional benefit of ITC in the GST regime was required to be passed on by the suppliers to the recipients by way of commensurate reduction in price, in terms of Section 171 of GST Act, 2017. It was amply clear that the ITC which was related to inputs and taxable turnover which was related to outputs (payments of GST on amounts collected), was mutually dependent on each other. Hence it was incorrect to say that in Real Estate Sector, there was no correlation of turnover with cost of construction or development of project.

- ii. That the methodology adopted by the DGAP in his Report was in line with the legal principles and this methodology of the DGAP had been consistent throughout in all his reports involving allegation of profiteering in similar cases and had been settled before the Authority. As regards methodology prescribed by the Authority, the procedure and methodology for determination of profiteering and intent thereof was determined by the Authority on case to case basis by adopting the most appropriate and accurate method based on facts and circumstances of each case as well as the nature of the goods and services supplied. Furthermore, the Authority had already notified the methodology and procedure under Rule 126 on 28.03.2018. The extent of profiteering had to be arrived at on a case to case basis, by adopting appropriate method based on the facts and circumstances of each case as well as the nature of goods or services supplied. There cannot be any uniform methodology for determination of the quantum of benefit to be passed on. The facts of each case were different, therefore the quantum of profiteering was determined by taking into

account the particular facts of each case. Hence, there cannot be one-size-fits-all mathematical methodology. It was also submitted that the additional ITC which has accrued to the Respondent on account of the implementation of the GST was required to be passed on to the customers, but a straight jacketed approach was not justifiable as the facts and conditions of each case vary substantially. Therefore, the profiteering computed in the instant case was entirely based on the facts and circumstances of the case and the data/information provided by the Respondent.

- iii. That Section 171 (1) of the CGST Act, 2017 stated that “Any reduction in rate of tax on any supply of goods or services or the benefit of ITC shall be passed on to the recipient by way of commensurate reduction in prices.” It was clear from the perusal of the above provision that it mentioned “benefit of ITC shall be passed on to the recipient” which did not mean that the benefit of ITC was to be restricted only to the applicant or the complainant or to the alleged project. Therefore, the benefit of ITC had to be passed on to each buyer/recipient. Further, the above Section mentioned “any supply” i.e., each taxable supply made to each recipient thereby clearly indicating that every customer/recipient was eligible to get his due benefit. In other words, every recipient of goods or services had to get the due benefit from the supplier and hence, this benefit had to be calculated for each and every service supplied by the Respondent.

9. Further, the DGAP’s clarifications dated 09.05.2022 were supplied to the Respondent and the Applicants to file their rejoinder. Vide e-mail dated 14.06.2022, the Respondent has submitted his rejoinder against DGAP’s clarifications wherein beside reiterating earlier submissions dated 13.04.2022 he has interalia stated:-

- i. That in DGAP’s Report dated 29.10.2021, the DGAP had not considered the amount of VAT credit while arriving at the ITC ratio to the total turnover and accordingly, the amount of VAT credit should be

taken into consideration for arriving at such ITC ratio. Hence, the profiteering demand should be reduced accordingly.

ii. That the construction of 2nd phase of the Project namely, "SKA Green Arch" started well after the implementation of GST law and thus, the second phase of the said Project could not be included for the purpose of calculation of profiteering amount which also got support from the following points:

- a. As per the consolidated progress report of the Project, no activity had been undertaken by the Respondent before 01.07.2017. Copy of consolidated progress report of project was collectively enclosed with this submission.
- b. RERA registration of the Project was effective from 03.08.2017 to 20.09.2022 i.e post GST. To substantiate the copy of RERA Registration certificate was enclosed with this submission.
- c. Copy of Chartered Engineer's Certificate dated 15.03.2018 was enclosed with this submission.

In view of the above submissions, it was evident that by 10.10.2017 no work was done by the Respondent as well as the Respondent had not incurred even a single rupee towards construction of 2nd Phase (ie, Tulip & Zinnia towers). Thus, it could be concluded that the 2nd phase of the project was clearly started after coming in force of GST, hence the same could not be included for the purpose of calculation of a profiteering amount as there had been no additional benefit of ITC to the Respondent w.r.t. to the 2 phase and accordingly, the Respondent was not required to pass on the benefits to such extent.

iii. That conclude the ongoing proceedings on the basis of his submissions dated 13.04.2022 and 14.06.2022 and accordingly, he did not require any personal hearing in the matter.

10. Further, in the interest of natural justice, the Respondent and Applicants were given an opportunity for a personal hearing in the matter on 21.06.2022. The hearing, held on 21.06.2022 via video conferencing, was

attended by the Applicants except the Applicant No. 1. During the hearing, Applicant No. 2 and 3 reiterated their earlier submissions dated 03.05.2022. Further, copy of the Respondent's submissions dated 14.06.2022 was supplied to the Applicants and the DGAP for their replies and clarifications under Rule 133(2A) of the CGST Rules, 2017.

11. The Applicant No. 2 & 3 by e-mail dated 16.07.2022 have filed their submissions against the Respondent's submissions dated 14.06.2022 vide which they stated that:-

- i. With reference to point No. 5- It was irrelevant when the Project started. The time of supply in GST regime is when GST was applicable. Hence its useless to create complexities by emphasizing on pre GST regime.
- ii. Reply to part D of point No. 6- All individuals who had purchased the property and were demanding their right had invested hard earned money and secondly, the Respondent won't be dishonest at giving incorrect information as to non-receipt of benefits.
- iii. Reply to part F of point No. 6- The comparison of ratio of ITC to turnover was a very correct method as there were also other Rules on the same (Rule 42 and 43), where ratio of ITC to turnover was applied hence questioning the formulae was not viable in law.
- iv. Reply to point No. 8- VAT credit 2022 was incorrect term, these taxes were subsumed into GST after GST applicability and to claim VAT there used to be form TRANS-1. Hence, proceedings should not go off the track.
- v. Reply to point No. 11- Anti profiteering was any reduction in the rate of tax on any supply of goods or services or the benefit of input tax credit which had to be passed on to the recipient by way of commensurate reduction in prices.

12. Further, the DGAP by letter dated 19.07.2022 filed his clarifications vide which the DGAP has clarified:-

- i. That during the course of investigation, the Respondent claimed before the DGAP that ITC of VAT was not allowed to him (Para 18 of the Report dated 29.10.2021). Further, as per VAT Returns submitted by the Respondent for the period from 01.04.2016 to 30.06.2017, the Respondent was paying VAT @10% of the total VAT paid on the purchase of inputs. Hence, it was observed that the ITC of VAT was not allowed to the Respondent. Therefore, no ITC of VAT was considered for computation of profiteering.
 - ii. That the project was launched in pre-GST regime and the Respondent had obtained single RERA registration for the entire project. Since, for all the towers i.e., Aster Tower, Orchid Tower, Tulip Tower and Zinnia Tower, there was single RERA registration, the second phase i.e., Tulip Tower and Zinnia Tower, could not be spared from the current investigation on the mere basis that the construction of same commenced in GST regime.
13. This Authority has carefully considered the Report furnished by the DGAP, all the submissions and the other material placed on record, and the arguments advanced by the Respondent and the Applicants. On examining the various submissions, the Authority finds 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 of ITC that has to be passed on to the recipients and whether various issues raised by the Respondent tenable in the given facts?
14. The Respondent has contended that the second phase of the Project namely; 'SKA Green Arch' cannot be included for the purpose of calculation of profiteered amount as no activity viz. construction, purchase, sale etc., has been done by the Respondent w.r.t. the said project during Pre-GST regime. It was claimed that considering the submissions made above, the total profiteering amount as calculated by DGAP to the tune of

Rs. 4,75,87,468/- would be reduced to Rs. 2,70,16,059/-. In support of his submissions, the Respondent has enclosed copies of consolidated progress report of Project, RERA Registration certificate and Chartered Engineer's Certificate dated 15.03.2018. In this regard, the Authority finds that the "SKA Green Arch" Project was launched in pre-GST regime. This Authority finds that, the Respondent has constructed this Project in two phases. In first phase, two towers i.e. Aster Tower and Orchid Tower and commercial spaces have been constructed and in the second phase two towers i.e., Tulip Tower and Zinnia Tower have been constructed. The Respondent has obtained single RERA registration for the entire "SKA Green Arch" Project. Since, for all the towers i.e., Aster Tower, Orchid Tower, Tulip Tower and Zinnia Tower, there is single RERA registration, the whole proceedings under the investigation should be considered as single case. It is obvious that financing of the whole project has been done as a single unit and considered financial statements have been submitted to RERA as a single unit. As such, they cannot be spared from the current investigation on the mere basis that the construction of second phase commenced in GST regime. The uniform practice of limiting the scope of investigation to the Project has been adopted by the DGAP/NAA, on the basis of RERA registration only, in respect of which the anti-profiteering application has been filed. Also, it is a fact that, Tulip Tower and Zinnia Tower which are constructed in second phase of the Project "SKA Green Arch" are located in the same premises of the Project for which no separate accounting of ITC is maintained by the Respondent. Therefore, the inputs and inputs services intended/meant for Tulip Tower and Zinnia Tower could be used for Aster Tower and Orchid Tower and also the ITC available in respect of Tulip Tower and Zinnia Tower might have been availed at the time of discharging his tax liability in respect of Aster Tower and Orchid Tower or vice versa. Therefore, investigation carried out by the DGAP considering second phase i.e., Tulip Tower and Zinnia Tower is correct, as per law and as approved by this Authority in other cases.

15. The Respondent has argued that comparison of ratio of ITC to turnover of Pre-GST regime with GST regime is not the correct mechanism for calculation of the profiteering amount. In this regard, the Authority finds that the benefit of additional ITC would depend on the comparison of the ITC/CENVAT credit which was available to a builder in the pre-GST period with the ITC available to him in the post GST period w.e.f. 01.07.2017. Without comparing the pre and post GST ratios of CENVAT/ITC to turnovers, the exact quantum of profiteering amount cannot be determined. The Authority holds that the DGAP has computed the profiteered amount by taking ITC to turnover ratios in the pre-GST & post-GST periods into account which is correct, reasonable and logical and in accordance with the mandate of Section 171 of the CGST Act, 2017.
16. The Respondent has contended that in absence of specified procedure and mechanism of calculation of profiteering, the proceedings initiated against the Respondent were arbitrary and thus liable to be dropped. In this regard, the Authority finds that the above contention of the Respondent is without substance as the 'Procedure and Methodology' for passing on the benefits of reduction in the rate of tax and ITC or for computation of the profiteered amount has been outlined in Section 171 (1) of the CGST Act, 2017 itself which provides that *"any reduction in rate of tax on any supply of goods or services or the benefit of input tax credit shall be passed on to the recipient by way of commensurate reduction in prices."* The Authority finds that it is clear from the plain reading of the above provision that it mentions "reduction in the rate of tax or benefit of ITC" which means that if any reduction in the rate of tax is ordered by the Central and the State Governments or a registered supplier avails benefit of additional ITC post-GST implementation, the same has to be passed on by him to his recipients since both the above benefits are being given by the above Governments out of their scarce and precious tax revenue. It also provides that the above benefits are to be passed on any supply i.e. on each product or unit of construction or service to every buyer and in

case they are not passed on, the quantum of denial of these benefits or the profiteered amount has to be computed for which investigation has to be conducted in respect of all such products/units/services by the DGAP.

17. The term 'profiteered amount' is clearly defined in the explanation attached to Section 171 of the CGST Act. These benefits can also not be passed on at the entity/organization/branch/ invoice/ business vertical level as they have to be passed on to each and every buyer at each product/unit/service level by treating them equally. The above provision also mentions "any supply" which connotes each taxable supply made to each recipient thereby making it evident that a supplier cannot claim that he has passed on more benefit to one customer on a particular product therefore he would pass less benefit or no benefit to another customer than what is actually due to that customer, on another product. Each customer is entitled to receive the benefit of tax reduction or ITC on each product or unit or service purchased by him subject to his eligibility.
18. The term "commensurate" mentioned in the above Sub-Section provides the extent of benefit to be passed on by way of reduction in the price which has to be computed in respect of each product or unit or service based on the price and the rate of tax reduction or the additional ITC which has become available to a registered person. The legislature has deliberately not used the word 'equal' or 'equivalent' in this Section and used the word 'Commensurate'. The benefit of additional ITC would depend on the comparison of the ITC/CENVAT credit which was available to a builder in the pre-GST period with the ITC available to him in the post-GST period w.e.f. 01.07.2017.
19. Similarly, the benefit of tax reduction would depend upon the pre-rate reduction price of the product and the quantum of reduction in the rate of tax from the date of its notification. Computation of commensurate reduction in prices is purely a mathematical exercise which is based upon the above parameters and hence it would vary from product to product or unit to unit or service to service 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 buyer. Similarly, computation of the profiteered amount is also a mathematical exercise that can be done by any person who has elementary knowledge of accounts and mathematics as per the Explanation attached to Section 171.

20. To further explain the legislative intent behind the above provision, this Authority has been authorized to determine the 'Procedure and Methodology' which has been done by it vide its Notification dated 28.03.2018 under Rule 126 of the CGST Rules, 2017. However, no fixed mathematical formula, in respect of all the Sectors or the products or the services, can be set for passing on the above benefits or for computation of the profiteered amount, as the facts of each case are different. In the case of one real estate project, date of start and completion of the project, price of the flat/shop, mode of payment of price or instalments, stage of completion of the project, rates of taxes pre and post GST implementation, amount of CENVAT credit and ITC available, total saleable area, area sold and the taxable turnover received before and after the GST implementation would always be different from the other project and hence the amount of benefit of additional ITC to be passed on in respect of one project would not be similar to the other project. Therefore, no set procedure or mathematical methodology can be framed for determining the benefit of additional ITC which has to be passed on to the buyers of the units.
21. This Authority under Rule 126 has been empowered to 'determine' Methodology & Procedure and not to 'prescribe' it. The facts of the cases relating to the sectors of Fast Moving Consumer Goods (FMCG), restaurant service, construction service, and cinema service are completely different from each other and therefore, the mathematical methodology adopted in the case of one sector cannot be applied to the other sector. Moreover, both the above benefits are being given by the Central as well as the State Governments as a special concession out of

their tax revenue in the public interest and hence the suppliers are not required to pay even a single penny from their own pocket and therefore, they are bound to pass on the above benefits as per the provisions of Section 171 (1) which are abundantly clear, unambiguous, mandatory and legally enforceable. The above provisions also reflect that the true intent behind the above provisions, made by the Central and the State legislatures in their respective GST Acts, is to pass on the above benefits to the common buyers who bear the burden of tax and who are unorganized, voiceless and vulnerable. It is abundantly clear from the above narration of the facts and the law that no elaborate mathematical calculations are required to be prescribed separately for passing on the benefit of ITC and computation of the profiteered amount. The Respondent cannot deny the benefit of ITC to his customers on the above ground and enrich himself at the expense of his buyers as Section 171 provides a clear-cut methodology and procedure to compute the benefit of ITC and the profiteered amount. Therefore, the Authority finds that the above contention of the Respondent cannot be accepted. The Respondent has also relied upon the judgement of the Hon'ble High Court of Madras passed in the case of Eternit Everest Ltd. Vs. UOI, 1997 (89) E.L.T. 28 (Mad.), wherein it was held that in the absence of machinery provisions to determination and adjudication upon a claim or objection, the statutory provision will not be applicable. On this aspect, this Authority finds that no tax has been imposed under the above measures and hence the law settled in the above case is not applicable. Section 171 (2) of the CGST Act, 2017 and Rule 122, 123, 129, and 136 of the CGST Rules, 2017 have provided elaborate machinery in the form of this Authority, the Standing and Screening Committees, the DGAP and a large number of field officers of the Central and the State Taxes to implement the anti-profiteering provisions. Therefore, the contention of the Respondent that, no machinery has been provided to implement the above measures is untenable.

22. The Respondent has also contended that without prejudice to his submissions, investigation proceedings cannot go beyond the application submitted by the Applicant No. 1. It is submitted that the Report should be restricted to the Applicant No. 1 only who has filed the application to concerned committee/officer. It is clear from the perusal of Section 171 (1) that "benefit of ITC shall be passed on to the recipient" which does not mean that the benefit of ITC is to be restricted only to the Applicant or the complainant. Therefore, the benefit of ITC has to be passed on to each buyer/recipient. Further, the above Section mentions "any supply" which expands the scope to cover all supplies; where tax reduction or ITC benefit has not been passed on. In other words, every recipient of goods or services has to get the due benefit from the supplier and hence, this benefit has to be calculated for each and every service supplied by the Respondent. In cases of Real Estate where it was alleged that provisions of Section 171 have been violated, the actual beneficiaries are identifiable as the details of home-buyers are available with the Respondent. Accordingly, the Report covers all the eligible beneficiaries and not just the Applicant No. 1 and the DGAP is justified in examining all the supplies made by the Respondent beyond the Application filed by the Applicant No. 1.
23. The Respondent has also contended that without prejudice to his submissions, the alleged profiteering amount has been incorrectly inflated by adding GST and the same is not sustainable. In this connection, the Authority holds that the Respondent has not only collected excess base prices from his customers which they were not required to pay due to the benefit of ITC but the Respondent has also compelled his customers to pay additional GST on these excess base prices which they should not have paid. By doing so, the Respondent has defeated the very objective of both the Central and the State Governments which aimed to provide the benefit of rate reduction to the general public. The Respondent was legally not required to collect the excess GST and therefore, he has not only violated the provisions of the CGST Act, 2017 but has also acted in

contravention of the provisions of Section 171 (1) of the Act supra, as he has denied the benefit of ITC to his customers by charging excess GST. Had he not charged the excess GST the customers would have paid less price while purchasing houses from the Respondent and hence above amount has rightly been included in the profiteered amount. The profiteered amount could also not be paid from the GST deposited in the account of the Central and State Governments by the Respondent as the amount is required to be deposited in the CWFs as per the provisions of Rule 133 (3) (a) of the CGST Rules, 2017. Therefore, the contention of the Respondent is not sustainable.

24. The Respondent has averred that the DGAP has not considered the amount of VAT credit while computing the profiteering. In this regard, the Authority finds that the Respondent has not submitted any documentary evidence i.e. copy of VAT Assessment Order neither before the DGAP nor this Authority in support of his above claim. Therefore, the above contention of the Respondent is not acceptable.
25. Further, the Applicants No. 2 & 3 vide e-mails dated 03.05.2022 and 16.07.2022 have filed their submissions/arguments against the Respondent's submissions dated 13.04.2022 and 14.06.2022 respectively. However, all the contentions raised by the Respondent in his submissions have already been addressed and replied in the above paras. The Authority finds that the Applicants have not submitted any argument against the DGAP's Report. Further, this Authority finds that the DGAP after considering all facts and submissions of the Respondent has concluded that during the period 01.07.2017 to 31.10.2020, the Respondent has realized an additional amount of Rs. 4,75,87,468/- which includes both the profiteered amount @8.37% of the taxable amount (base price) and GST on the said profiteered amount from the 206 customers/buyers.
26. It is clear from the plain reading of Section 171 (1) that it deals with two situations:- one relating to the passing on the benefit of reduction in the

rate of tax and the second on 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 has been no reduction in the rate of tax in the post-GST period; hence the only issue to be examined is whether there was any net benefit of ITC with the introduction of GST. On this issue, it has been revealed from the DGAP's Report 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 0.76% and during the post-GST period (July-2017 to October-2020), it was 9.13% for the Project "SKA Green Arch". This confirms that post-GST, the Respondent has benefited from additional ITC to the tune of 8.37% [9.13% (-) 0.76%] of his turnover for the said Project, and the same was required to be passed on to the customers/flat buyers/recipients. The DGAP has calculated the amount of ITC benefit to be passed on to all the flat buyers as Rs. 4,75,87,468/- for the Project "SKA Green Arch", the details of which are mentioned in Annexure-24 of the Report.

27. For the reasons discussed hereinabove, the Authority finds no reason to differ from the above-detailed computation of profiteering in the DGAP's Report or the methodology adopted and hence, the Authority determines the profiteered amount for the period from 01.07.2017 to 31.10.2020, in the instant case, as Rs. 4,75,87,468/- for the Project "SKA Green Arch". 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 flats commensurate with the benefit of ITC received by him as has been detailed above.
28. Given the above discussions, the Authority finds that the Respondent has profiteered by Rs. 4,75,87,468/- for the Project "SKA Green Arch" during the period of investigation i.e. 01.07.2017 to 31.10.2020. The above amount that has been profiteered by the Respondent from his home buyers/customers/recipients of supply in the above said 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 payment, under the provisions of Rule 133 (3) (b) of the CGST Rules, 2017.

29. The complete list of home buyers/customers/recipients of supply has been attached as Annexure - 'A' with this Order, containing the details of the amount of benefit of ITC to be passed on in respect of the Project "SKA Green Arch" of the Respondent.
30. This Authority also orders that the profiteered amount of Rs. 4,75,87,468/- for the Project "SKA Green Arch" along with the interest @ 18% from the date of receiving of the profiteered amount from the home buyers/customers/recipients of supply till the date of passing the benefit of ITC shall be paid/passed on by the Respondent within a period of 3 months from the date of this Order failing which it shall be recovered as per the provisions of the CGST Act, 2017.
31. It is also evident from the above narration of facts that the Respondent has denied the benefit of ITC to the customers/flat buyers/recipients in his Project "SKA Green Arch" 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. This Authority finds 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 01.07.2017 to 31.10.2020, therefore, the Authority finds that the Respondent 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 to explain why penalty should not be imposed on him.
32. 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 home buyer/customer/recipient of supply as per Annexure- 'A' attached with this Order along with interest @18% as prescribed, if not paid already. In this regard an advertisement of appropriate size to be visible to the public may also be published in a

minimum of two local Newspapers/vernacular press in Hindi/English/local language with the details i.e. Name of the builder (Respondent) – M/s Prasu Infrabuild Pvt. Ltd., Project- “SKA Green Arch”, Location- Greater Noida (West), Uttar Pradesh and profiteered amount i.e. Rs. 4,75,87,468/- so that the concerned home buyers/customers/recipients of supply can claim the benefit of ITC if not passed on. Homebuyers/ /customers/recipients of supply may also be informed that the detailed NAA Order is available on Authority's website www.naa.gov.in. Contact details of the concerned Jurisdictional CGST/SGST Commissioner may also be advertised through the said advertisement.

33. The concerned jurisdictional CGST/SGST Commissioner shall also submit a Report regarding the compliance of this Order to this Authority and the DGAP within a period of 4 months from the date of this Order.
34. The present investigation has been conducted up to 31.10.2020 only. However, the Respondent has not obtained the Completion Certificate (CC) till that date. Therefore, he is liable to pass on the benefit of ITC which would become available to him till the date of issue of Completion Certificate. Accordingly, the concerned jurisdictional Commissioner CGST/SGST is directed to ensure that the Respondent passes on the benefit of ITC to the eligible home buyers/customers/recipients of supply as per the methodology approved by this Authority in the present case and submit his report to this Authority through the DGAP. The Applicants or any other interested party/person shall also be at liberty to file a complaint against the Respondent before the Uttar Pradesh State Screening Committee in case the remaining benefit of ITC is not passed on to them.
35. Since the Respondent has profiteered in the instant project, there is every likelihood that he has profiteered in other projects also under the GSTIN 09AAGCP9220N1ZW. The Authority has reasons to believe that the Respondent may have resorted to profiteering in the other projects also and hence, it directs the DGAP under Rule 133(5) to investigate all the other projects of the Respondent under the same GST registration which

have not yet been investigated from the perspective of Section 171 of the CGST Act, 2017 and submit complete investigation report for all the Projects under this single GST Registration.

36. The Hon'ble High Court of Delhi, vide its Order dated 10.02.2020 in the case of Nestle India Ltd. & Anr. Vs. Union of India has held that:-

"We also observe that prima facie, it appears to us that the limitation of period of six months provided in Rule 133 of the CGST Rules, 2017 within which the authority should make its order from the date of receipt of the report of the Directorate General of Anti Profiteering, appears to be directory in as much as no consequence of non-adherence of the said period of six months is prescribed either in the CGST Act or the rules framed thereunder."

37. A copy of this order be sent, free of cost, to all the Applicants, the Respondent, Concerned jurisdictional Commissioners CGST/SGST and the Principal Secretary (Town and Country Planning), Government of Uttar Pradesh as well as Uttar Pradesh RERA for necessary action. File be consigned on completion.

Encl:- Annexure- A (Pages 1 to 25).

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/Prasu/78/2022 | 8804 - 8821 Dated: 15.09.2022

Copy To:-

1. M/s Prasu Infrabuild Pvt. Ltd., GH- 05B, Sector- 16B, Greater Noida West, Uttar Pradesh-201009.
2. Sh. Karunakar Singh, 001, Gara Katara Singh Villa, Shankargarh, Allahabad, Uttar Pradesh.
3. Sh. Gaurav Mishra, gauravmishra666@gmail.com
4. Sh. Shailendra Singh, shailendra093@gmail.com
5. Sh. Gajendra Kumar, lavishbhati2007@gmail.com
6. Sh. Gaurav Srivastav, gaurav2924@gmail.com
7. Sh. Saroj Mohan Jha, jha146@gmail.com
8. Sh. Aginvesh Mishra, ani05122006@gmail.com
9. Sh. Deepjyoti Acharjee, deepacharjee@gmail.com

10. Sh. Love Kumar, kumarlove630@gmail.com
 11. Sh. Ankit Anand, ankit.tech@outlook.com
 12. Sh. Ram Sharan Sah, jyoti_ram2004@yahoo.co.in
 13. Director General Anti-Profiteering, Central Board of Indirect Taxes & Customs, 2nd Floor, Bhai Vir Singh Sahitya Sadan, Bhai Vir Singh Marg, Gole Market, New Delhi-110001.
 14. Uttar Pradesh RERA, Naveen Bhavan, Rajya Niyojan Sansthan, Kala Kankar House, Old Hyderabad, Lucknow-226007 (E-mail:- contactuprera@up-rera.in).
 15. UP RERA Regional Office, H-169, Chitvan State Road, Estate Sector, Block H, Gamma II, Greater Noida, UP-201308.
 16. Commissioner of Commercial Taxes, Office Of The Commissioner, Commercial Tax, U.P. Commercial Tax Head Office Vibhuti Khand, Gomti Nagar, Lucknow (U.P) (E-mail:- ctcomhqlu-up@nic.in).
 17. Chief Commissioner of CGST, Meerut Zone, Mangal Pandey Nagar, Meerut-250004 (E-mail:- ccu-cexmeerut@nic.in).
 18. Guard File.
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ANNEXURE-A			
LIST OF HOMEBUYERS OF THE PROJECT "SKA Green Arch"			
S. No.	Customer Name	Unit Number	Amount of ITC to be passed on (in Rs.)
1	Mrs. Hemangi Saikia	101	*
2	Mrs. Sharda Chaudhary	102	*
3	Mr. Sachin Kumar Raghav	103	*
4	Mr. Pradeep Kumar Mathur	104	*
5	Mr. Atul Goyal	105	*
6	Mr. Rahul Kumar	106	*
7	Mr. Ravi Shankar Prasad	107	*
8	Ms. Ritu	108	*
9	Mrs. Bindiya Vidushi	109	*
10	Mr. Ratnesh Kumar	110	*
11	Mrs. Fahmida Naz	111	*
12	Mr. Amar Mummad	112	*
13	Mr. Aditya Agarwal	114	*
14	Mrs. Arshi Raza	115	*
15	Mr. Sanjay Kumar Dargan	116	242,563
16	Mr. Nikhil Dargan	117	242,563
17	Mr. Vinod Kumar Sharda	201	*
18	Ms. Saloni	202	*
19	Mr. Sunil Kumar Sinha	203	*
20	Mr. Kartik Chandra Bera	204	*
21	Mr. Sachin Manohar Agashe	205	*
22	Mr. Saurabh Malviya	206	*
23	Mr. Anjani Kumar	207	*
24	Mr. Gajendra Kumar	208	*
25	Mr. Braj Bhooshan	209	*
26	Mrs. Shobhita Ojha	210	250,191
27	Mr. Sita Ram	211	261,656
28	Dr. Rashmi Kumari	212	317,230
29	Mr. Jag Mohan	214	323,416
30	Mr. Mukesh Verma	215	253,724
31	Mrs. Sulata Das Gupta	216	*
32	Mrs. Dolly Singh	217	*

33	Mr. Arvind Kumar Chaurasiya	301	*
34	Mr. Yash Kumar Sharma	302	*
35	Mrs. Shveta Katyal	303	*
36	Mr. Vipul Tiwari	304	260,044
37	Mr. Indra Bhushan Mishra	305	247,835
38	Mrs. Sandhya	306	*
39	Mr. Amit Gupta	307	*
40	Mr. Sanjeev Kumar	308	*
41	Mrs. Manjari Pandey	309	*
42	Mr. Vinay Kumar	310	*
43	Mrs. Kanchan Lata Mall	311	260,044
44	Mr. Puneet Sharma	312	337,591
45	Mr. Arun Kumar	314	326,451
46	Mr. Vidit Kumar	315	*
47	Mr. Sarvesh Bhasin	316	*
48	Mr. Deepak Kumar Singh	317	*
49	Mr. Kunal Kumar	401	*
50	Mr. Achal Singh	402	210,924
51	Mr. Anup Mani Tripathi	403	*
52	Mr. Laxmi Narayan Paswan	404	253,159
53	Mrs. Sangeeta Kumari	405	*
54	Mr. Varun Prakash Upadhyay	406	*
55	Mrs. Ratnesh	407	*
56	Sanjay Kumar Panday	408	*
57	Mr. Raj Kumar	409	242,563
58	Mr. Kesar Singh Karki	410	233,799
59	Ms. Surabhi Vatsa	411	*
60	Mr. Prashant Kumar Jha	412	*
61	Dr. Narayan Dutta	414	307,105
62	Mr. Kashi Nath Rai	415	226,743
63	Mr. Tarun Kumar	416	249,934
64	Mr. Ashish Kumar Mishra	417	*
65	Mrs. Pammi Singh	501	*
66	Mr. Narendr Kumar	502	198,968
67	Mrs. Preeti	503	*
68	Mr. Ashish Kumar Sinha	504	248,939

69	Mr. Jatin Dhupar	505	*
70	Mr. Shivilal Khandelwal	506	201,081
71	Mr. Yashpal Singh Negi	507	197,094
72	Mrs. Suruchi Thakur	508	*
73	Mr. Parmatma Prasad	509	*
74	Mr. Santosh Kumar	510	257,242
75	Mr. Arjun Sharma	511	243,603
76	Mr. Vikram Singh	512	*
77	Mr. Rohit Singh	514	327,973
78	Mr. Raghwendra Kumar	515	262,034
79	Mr. Shubham Khare	516	248,218
80	Mr. Ashish Maheshwari	517	*
81	Mr. Sudhir Kumar Trivedi	601	*
82	Mrs. Ritu Pal	602	209,869
83	Mr. Umesh Kumar	603	*
84	Mr. Bushan Lal Bhat	604	251,000
85	Mr. Praveen Kumar	605	248,449
86	Mr. Santosh Kumar Chauhan	606	*
87	Mrs. Kanu Priya	607	*
88	Mr. Rajeev Gupta	608	*
89	Mr. Rajamandry Venkateswara Rao	609	*
90	Mrs. Neha Jain	610	246,305
91	Mr. Amit Kumar Das	611	255,206
92	Mr. Satyendra Priyadarshi	612	*
93	Mr. Brajmohan	614	314,758
94	Mrs. Sangeeta Singh	615	248,449
95	Mr. Akash Khare	616	246,503
96	Mr. Tripurari Kumar	617	*
97	Mrs. Babita	701	*
98	Mr. Prabodh Kumar Singh	702	198,479
99	Mrs. Artee Singh	703	*
100	Mrs. Shumaila Praveen	704	282,597
101	Mr. Vinod Singh Rathor	705	240,072
102	Mr. Pushkar Sonal	706	*
103	Mrs. Nirmala Gaur	707	203,893
104	Mrs. Sadhana Upadhyay	708	*

105	Mr. Rajneesh Kumar Sharma	709	*
106	Ms. Himanshi Baluni	710	244,976
107	Mr. Charanjit Singh	711	235,883
108	Mr. Shailesh Sharma	712	*
109	Mrs. Arti Dwivedi	714	308,652
110	Mr. Roushan Kumar	715	237,342
111	Mrs. Priyanka Rawat	716	249,333
112	Mr. Kapil Dev Arora	717	248,750
113	Mr. Atul Rawat	801	*
114	Mr. Arun Pratap Singh Kushwah	802	204,653
115	Mr. Pankaj Dwivedi	803	*
116	Mr. Sanjay Kumar Jha	804	237,557
117	Mr. Brijesh Kumar Jha	805	237,557
118	Mr. Ravi Shankar	806	*
119	Mr. Rajesh Kumar	807	*
120	Mr. Sunil Kumar Choudhary	808	*
121	Mr. Keshava Nand Jha	809	*
122	Mr. Prem Pal Singh	810	242,831
123	Mrs. Papita Khanra	811	*
124	Mr. Shyam Bahadur Singh	812	*
125	Mr. Mayank Sharma	814	328,310
126	Mr. Manish Kumar Sinha	815	238,542
127	Mr. Jay Prakash Rajupt	816	*
128	Mr. Pooja Dubey	817	*
129	Mr. Hemant Kumar Tanwar	901	*
130	Mr. Sachin Sharma	902	193,347
131	Mr. Sudhanshu Gaur	903	193,347
132	Mr. Anand Kishor	904	231,946
133	Mr. Atul Kumar Singh	905	*
134	Mr. Krishna Mohan	906	*
135	Mrs. Seema Manchanda	907	*
136	Mr. Sandeep Sharma	908	*
137	Mr. Vivek Kumar	909	*
138	Mrs. Rojy Kumari	910	231,595
139	Mr. Ravi Ranjan Singh	911	248,205
140	Mr. Ram Bali Kanaujia	912	*

141	Mr. Prabhakar Jha	914	316,386
142	Mr. Bhagwan Das	915	236,312
143	Mr. Mohd. Ahsan Ali	916	223,017
144	Mrs. Isret	917	223,017
145	Mr. Ankit Kumar	1001	*
146	Mr. Charanjeet Sachdeva	1002	219,127
147	Mr. Pramod Kumar	1003	200,336
148	Mr. Naresh Chandra	1004	246,005
149	Mr. Amit Sharan	1005	241,930
150	Mr. Ananata Singh	1006	*
151	Mr. Naveen Raina	1007	198,578
152	Mr. Amit Kumar	1008	224,306
153	Mrs. Hima Manral	1009	257,538
154	Mrs. Deepa Singh	1010	237,805
155	Mr. Sunit Kumar Shrivastava	1011	242,563
156	Mr. Arun Kumar	1012	*
157	Mrs. Soniya Rathore	1014	314,035
158	Mrs. Rupali Srivastava	1015	*
159	Mr. Naresh Bhandari	1016	244,187
160	Mr. Abhishek Dutta	1017	241,339
161	Mr. Love Kumar	1101	*
162	Mr. Niranjan Singh	1102	197,228
163	Mr. Santosh Kumar	1103	190,535
164	Mr. Sumanshu Ashta	1104	240,413
165	Mr. Vikas Garg	1105	221,730
166	Mrs. Anuja Singh	1106	*
167	Mr. Ranjeet Kumar	1107	168,420
168	Mr. Mohit Khulbe	1108	203,823
169	Mr. Surya Prakash Mishra	1109	239,047
170	Mr. Sumit Kumar Gautam	1110	240,687
171	Mr. Amit Pratap Singh	1111	247,143
172	Mr. Himanshu Kandpal	1112	331,433
173	Miss. Aarushi Bhandari	1114	281,232
174	Mr. Ravi Ranjan	1115	233,563
175	Mr. Nitesh Kumar Sinha	1116	229,364
176	Mr. Sumit Saxena	1117	*

177	Mr. Basant Kumar Soni	1201	*
178	Mr. Praveen Kumar Singh	1202	187,547
179	Mr. Rajiv Ranjan Jha	1203	189,058
180	Mr. Sanjay Kumar Jha	1204	230,695
181	Mr. Jitendra Kumar Jha	1205	230,695
182	Mr. Harish Kumar Singh	1206	*
183	Mr. Ajay Kumar	1207	196,862
184	Mrs. Reshu Singh	1208	*
185	Mr. Sunil Kumar Sharma	1209	230,259
186	Mr. Ratnesh Kumar	1210	246,078
187	Mr. Kunal Saurav	1211	235,532
188	Mr. Sunil Kaul	1212	*
189	Mrs. Dipti Singh	1214	*
190	Mr. Amit Raj Khera	1215	229,021
191	Mrs. Rekha	1216	250,296
192	Mr. Kaushal Kumar Jha	1217	250,296
193	Miss. Ananya Tripathi	1401	*
194	Mr. Ashwani Kumar Chaudhari	1402	*
195	Mr. Anil Kumar	1403	199,675
196	Mr. Shailendra Kumar	1404	241,505
197	Mrs. Veena Rani	1405	238,645
198	Mr. Jespal Singh	1406	*
199	Mr. Vishnu Kumar Omar	1407	*
200	Mr. Atul	1408	*
201	Mr. Sunil Kumar	1409	*
202	Mrs. Preeti Bisht	1410	233,422
203	Mrs. Indravati Shukla	1411	*
204	Mr. Chandrashekhar	1412	*
205	Mr. Parteek Bajaj	1414	*
206	Mr. Madhur Arya	1415	*
207	Mrs. Guddi Yadav	1416	232,470
208	Mrs. Himali Jaiswal Punyani	1417	*
209	Mrs. Pratibha Kumari	1501	202,136
210	Mr. Vikas Gupta	1502	186,501
211	Mr. Deepak Kumar	1503	193,178
212	Mr. Vikram Ghosh	1504	*

213	Mr. Shyam Singh	1505	*
214	Mr. Harinderjit Singh	1506	201,573
215	Mr. Shailendra Singh Thakur	1507	*
216	Mrs. Chitralekha Jaiswal	1508	191,027
217	Mr. Atindra Mishra	1509	*
218	Mr. Praveen Kumar	1510	232,178
219	Mrs. Sushila Kumari	1511	225,689
220	Mr. Rohit Kumar	1512	316,136
221	Mr. Manoj Kumar	1514	316,136
222	Mr. Sushil Kumar Pandey	1515	227,306
223	Mr Anil Kumar Gupta	1516	*
224	Mr. Sinku Kumar Mehta	1517	234,925
225	Mr. Awadhesh Kumar Tripathi	1601	198,240
226	Mr. Subodh Kumar Singh	1602	189,832
227	Mr. Pradeep Singh	1603	*
228	Mrs. Roopali Rawat	1604	237,289
229	Mr. Gaurav Arora	1605	*
230	Laxman Kamal	1606	*
231	Mr. Sumit Verma	1607	*
232	Mr. Abhay Singh Sengar	1608	*
233	Mr. Devasirvatham Andrew	1609	248,694
234	Mr. Pawan Kumar Joshi	1610	242,130
235	Mrs. Neelam Srivastava	1611	233,782
236	Mr. Harish Chandra Singh	1612	309,490
237	Miss. Shweta Marilyn Tigga	1614	298,598
238	Mr. Lalit Panwar	1615	*
239	Mr. Praveen Kumar Thakur	1616	226,019
240	Mr. Ghanendra Prasad Kandwal	1617	238,549
241	Mr. Vishal	1701	*
242	Mr. Somdutt Upadhyay	1702	184,636
243	Mrs. Priya Patil	1703	*
244	Mr. Suman Kaintura Singh	1704	*
245	Mr. Subir Ghosh	1705	237,289
246	Mrs. Sabeen Kausar Abbas	1706	190,289
247	Mr. Anirudh Sharma	1707	*
248	Mrs. Deepika Patel	1708	*

249	Mr. Bansh Raj Shukla	1709	239,355
250	Mr. N.N. Pandey	1710	239,355
251	Mrs. Sikha Deka	1711	243,477
252	Mr. Sanjeev Kumar Mishra	1712	*
253	Mrs. Minakshi	1714	300,288
254	Mrs. Himanshu Bishnoi	1715	*
255	Mr. Ashutosh Sharma	1716	221,470
256	Mr. Virender Kumar Tyagi	1717	239,047
257	Mr. Rakesh Kumar	1801	*
258	Mr. Pravin Kumar	1802	191,589
259	Mr. Prabhat Mohan	1803	*
260	Mr. Manish Kumar	1804	232,195
261	Mr. Ravikesh Kumar Pandey	1805	*
262	Mrs. Vijeta Singh	1806	*
263	Mr. Raj Mangal Giri	1807	*
264	Mr. Kapil Deo Yadav	1808	*
265	Mr. Devi Ratan Tiwari	1809	*
266	Mr. Aginvesh Mishra	1810	156,224
267	Mr. Naveen Bagotra	1811	238,026
268	Mr. Naval Soni	1812	*
269	Mr. Vikram Singh	1814	*
270	Mr. Vinamra Kumar Shukla	1815	230,291
271	Mr. Munna Kumar Singh	1816	226,157
272	Mr. Ashish Kumar Mishra	1817	242,397
273	Mr. Himanshu Sharma	1901	*
274	Mrs. Ruchi Narayan	1902	*
275	Mr. Ashish Kumar Sharma	1903	*
276	Mr. Jawahar Lal	1904	*
277	Mr. Sanjeev Sharma	1905	*
278	Mrs. Pratima Singh	1906	*
279	Mr. Sanjay Kumar	1907	193,066
280	Mr. Rohit Tanwar	1908	*
281	Mr. Ankit Sharma	1909	*
282	Mr. Pradeep Kumar Singh	1910	226,019
283	Mr. Siddharth Singh	1911	235,856
284	Mrs. Adesh Kumari	1912	*

285	Mr. Sanjay Goel	1914	*
286	Mr. Sultan Singh	1915	227,385
287	Mrs. Pratyaksha	1916	*
288	Mr. Vikas Pathak	1917	*
289	Mr. Ajay Kumar	2001	*
290	Mr. Sanjib Kumar Jha	2002	187,863
291	Ms. Neeti	2003	*
292	Mr. Abhishek Kumar	2004	226,251
293	Mr. Rajesh Prasad	2005	228,970
294	Mr. Birendra Singh	2006	*
295	Mr. Faraz Alam	2007	*
296	Mr. Vinod Kumar Singh	2008	*
297	Mr. Sumit Singh	2009	*
298	Mr. Nitendra Kumar	2010	221,470
299	Mr. Bharat Maheshwari	2011	*
300	Mrs. Seema Srivastava	2012	*
301	Mrs. Manju Meena	2014	306,498
302	Mr. Kishore Kumar	2015	*
303	Mrs. Neha Rana	2016	214,439
304	Mrs. Sudarshna Singh	2017	*
305	Mr. Shailendra Singh	2101	*
306	Mr. Anil Kumar Sharma	2102	*
307	Mr. Gaurav Kumar Sharma	2103	185,079
308	Mr. Ram Prakash	2104	*
309	Mr. Vinod Kumar	2105	248,450
310	Mr. Praveen Singh	2106	*
311	Mr. Hasan Abbas Rizvi	2107	188,425
312	Mr. Ramendra Chauhan	2108	*
313	Mr. Om Prakash Srivastava	2109	220,512
314	Mr. Niraj Kumar Srivastava	2110	220,512
315	Mrs. Shweta Joshi	2111	*
316	Mr. Sanjay Kumar	2112	*
317	Mrs. Nutan Jha	2114	*
318	Mr. Sunil Kumar	2115	223,322
319	Mr. Saleem Babu	2116	216,584
320	Mr. Karunakar Singh	2117	*

321	Mr. Sharvan Kumar Singh	2201	*
322	Mr. Amit Singh	2202	183,644
323	Mrs. Puja Kumari	2203	*
324	Mr. Abhimanyu Kahal	2204	*
325	Mr. Ankit Raghuvanshi	2205	*
326	Mr. Manoj Kumar	2206	*
327	Mr. Umesh Avasthi	2207	187,722
328	Mr. Atul Srivastava	2208	*
329	Mr. Kanchan Singh	2209	*
330	Mrs. Rajbir Bhardwaj	2210	221,859
331	Mr. Uttam Singh	2211	*
332	Mr. Rahul Choudhary	2212	*
333	Mrs. Tanvi Bhatia	2214	*
334	Mr. Vijay Kumar Poddar	2215	222,338
335	Mr. Bhartendu Gautam	2216	228,267
336	Mr. Virender Kumar	2217	*
337	Mr. Hilal Ahmad Bhat	2301	*
338	Mr. Ranjit Burnwal	2302	174,364
339	Mr. Naveen Sharma	2303	*
340	Mrs. Suman Goyal	2304	*
341	Mr. Neeraj Kumar Agarwal	2305	231,018
342	Mr. Ramraj Kushwaha	2306	*
343	Mr. Sanjay Kumar Gupta	2307	180,093
344	Mr. Manoranjan Prasad	2309	*
345	Mrs. Sudha Mishra	2310	221,988
346	Mrs. Zahida Tabassum	2311	*
347	Mr. Mohd Dilshad Khan	2312	*
348	Mr. Vivek Srivastava	2314	*
349	Mr. Mohammed Nauroz Ahmad	2315	222,374
350	Mrs. Sangeeta Jha	2316	220,229
351	Mrs. Famida Saifi	2317	*
352	Mr. Imtiyaz Ahmad Wani	2401	*
353	Mr. Raj Kishor Sharma	2402	177,879
354	Mr. R. Ramesh	2403	*
355	Mr. Nayan Dey	2404	*
356	Mr. Bimal Kumar Dey	2405	*

357	Mr. Chandra Shekhar Menaria	2406	191,378
358	Mr. Aayush Verma	2407	186,288
359	Mr. Sushant Kumar	2408	*
360	Mr. Divya Batra	2409	*
361	Mr. Ajay Kumar Singh	2410	225,674
362	Mr. Dinesh Chandra Gayari	2411	*
363	Mrs Monika Agarwal	2412	*
364	Mr. Atul Kumar Shukla	2414	*
365	Mr. Pankaj Kumar Singh	2415	218,978
366	Mr. Sandeep Kumar	2416	209,365
367	Mr. Shashank Tyagi	2417	*
368	Mr. Ankit Anand	2501	*
369	Mrs. Deepika Singh	2502	178,371
370	Mr. Ganga Kakkar	2503	*
371	Mr. Mukesh Singh Kushwah	2504	220,064
372	Mrs. Swati Bajpai	2505	222,923
373	Mr. Sachin Kapila	2506	*
374	Mr. Rajesh Kumar	2507	199,923
375	Mr. Basant Lal	2508	*
376	Mrs. Anamika Chaturvedi	2509	*
377	Mr. Sunil Kumar	2510	216,755
378	Mr. Vikas Kumar	2511	*
379	Mr. Apoorv Kumar	2512	*
380	Mr. Azeem Haider	2514	284,427
381	Mr. Rana Mukherjee	2515	230,308
382	Mr. Kanwar Pal Singh	2516	214,251
383	Mr. Varun Kumar Tyagi	2517	*
384	Mr. Ashish Saxena	2601	*
385	Mr. Dilip Kumar	2602	175,770
386	Mr. Rajendra Singh Yadav	2603	*
387	Mrs. Kamlesh	2604	*
388	Mr. Rakesh Garg	2605	*
389	Mrs. Anupam Jha	2606	*
390	Mrs. Anju Singh	2607	176,508
391	Mrs. Abira Sharma	2608	*
392	Mr. Anil Nigam	2609	228,501

393	Mrs. Sneha Rai	2610	224,283
394	Miss. Shipra Bajpai	2611	*
395	Miss. Farheen Saif	2612	*
396	Mr. Saroj Kumar	2614	278,982
397	Mr. Kumud Dixit	2615	215,211
398	Mrs. Neha Rathi	2616	212,570
399	Mr. Praveen Tandon	2617	222,423
400	Mr. R.K Sajgotra	2701	*
401	Mr. Jagdish Raj Langeh	2702	174,364
402	Mr. Sanjay Kumar	2703	*
403	Mrs. Simple	2704	*
404	Mr. Akhilesh Singh Bisht	2705	*
405	Mr. Kapil Agarwal	2706	*
406	Mr. Deepjyoti Acharjee	2707	*
407	Mr. Sanjay Kumar Singh	2708	*
408	Mr. Amol Mittal	2709	*
409	Mr. Aakash Trivedi	2710	220,810
410	Mr. Pramod Kumar Mittal	2711	*
411	Mr. Vishal Kumar	2712	*
412	Mr. Satendra Kumar Srivastva	2714	*
413	Mrs. Aruna Kaul	2715	219,929
414	Tm Impex Private Limited	2716	*
415	Mr. Gaurav Mishra	2717	*
416	Mr. Chandra Pal Singh	2801	*
417	Mr. Rakesh Shankar Pokhriyal	2802	172,255
418	Mr. Yuvraj Singh	2803	*
419	Mr. Abhinav Seth	2804	*
420	Mr. Jeetu Juneja	2805	*
421	Mr. Sandeep Sharma	2806	*
422	Mrs. Sanju Kumar	2807	171,833
423	Mr. Mohammad Ashraf	2808	*
424	Mrs. Ayushi	2809	*
425	Mr. Laliteshwar Singh	2810	216,155
426	Mrs. Nirmala Gusain	2811	*
427	Mr. Sri Krishan	2812	*
428	Mr. Amit Kishore	2814	*

429	Mr. Shashi Prakash	2815	212,038
430	Mrs. Sushma Kumari	2816	212,270
431	Mrs. Nupur Jain	2817	*
432	Mr. Bharat Bhushan Sharma	2901	*
433	Mrs. Jyoti Jayswal	2902	*
434	Mrs. Seema	2903	*
435	Mrs. Leela Bhagat	2904	*
436	Mr. Krishna Chandra Joshi	2905	*
437	Mr. Habibul Islam	2906	*
438	Mr. Punit Kumar Rai	2907	*
439	Mr. Gaurav Kumar Srivastava	2908	*
440	Mr. C. S. Gautam	2909	*
441	Mrs. Anita Rani Jena	2910	*
442	Mr. Nitin Kumar	2911	*
443	Mr. Anurag Singh	2912	*
444	Mr. Mahender Pal	2914	276,755
445	Mr. Rupesh Kumar Singh	2915	219,730
446	Mrs. Pallavi Bisht	2916	212,621
447	Mr. Rajnish Srivastava	2917	*
448	Mr. Rajnish Kumar Singh	3001	*
449	Mr. Abhijit Chowdhury	3002	174,694
450	Mr. Ajay Kumar Pandey	3003	*
451	Mr. Sneha Shree	3004	*
452	Mr. Naresh Chandra	3005	*
453	Mr. Mukesh	3006	*
454	Mr. Debaraj Naik	3007	*
455	Mr. Shantanu Srivastava	3008	*
456	Mr. Mohit Jain	3009	*
457	Mrs. Shashi Solanki	3010	*
458	Mr. Deepak Kumar Soni	3011	*
459	Mr. Saumyendu Bhattacharyya	3012	*
460	Mr. Nirvikar Singh	3014	267,170
461	Mrs. Urmila Rawat	3015	210,134
462	Mrs. Poonam Chandwani	3016	197,284
463	Mr. Rajiv Gupta	3017	*
464	Mr. Amit Dwivedi	3101	*

465	Mr. Brij Mohan Madan	3102	*
466	Mrs. Niranka Pathak	3103	*
467	Mr. Rajan Kumar Pandey	3104	*
468	Mr. Manoj Kumar Munde	3105	*
469	Mr. Balwant Singh	3106	*
470	Mr. Rajesh Kumar Pandey	3107	*
471	Mr. Vijay Kumar Bin	3108	*
472	Mr. Ashutosh Kumar	3109	*
473	Mrs. Anju Sharma	3110	*
474	Mr. B.L. Sahu	3111	*
475	Mr. Amit Bandyopadhyay	3112	*
476	Kaushik Chaudhuri	3114	*
477	Mrs. Richa Mishra	3115	*
478	Ms. Abinaya Karunakaran	3116	*
479	Mrs. Deepa Chhabra	3117	*
480	Mrs. Anita Garg	FF-01	*
481	Mr. Anurag Bhatia	FF-02	*
482	Mr. Arun Kumar Sahu	FF-03	*
483	Mr. Manoj Kumar	FF-04	*
484	Mr. Sharad Parashar	FF-05	*
485	Mr. Shyam Bahadur Singh	FF-06	*
486	Mrs. Deepika Bisht	FF-07	*
487	Mrs. Prity Singh	FF-08	*
488	Mrs. Nivedita	FF-09	*
489	Mr. Nikhil Gupta	FF-10	*
490	Mr. Mukesh Chandra Jha	FF-11	*
491	Mr. Pankaj Kr. Srivastava	GF-05	160,867
492	Mrs. Anuja Jha	GF-06	*
493	Mrs. Hema Sharma	GF-07	*
494	Mrs. Geeta Gupta	GF-08	127,389
495	Mrs. Sarla Gupta	GF-09	*
496	Ms. Ananya Singh	GF-10	*
497	Ms. Anubhuti Singh	GF-11	*
498	Mr. Praveen Kumar Mittal	UB-04	*
499	Mr. Sunil Kumar Mittal	UB-05	*
500	Mr. Anil Kumar Mittal	UB-06	*

501	Mr. Mihier Shastri	124	*
502	Mrs. Trishala Singh	126	*
503	Mr. Chandra Pal Savita	127	*
504	Mr. Piyush Yadav	218	*
505	Mrs. Panwar Rekha	219	*
506	Mr. Hewanti Devi	220	*
507	Mr. Dharmendra Tiwari	224	*
508	Mr. Anup Kumar	225	*
509	Mr. Ashish Kumar Chaudhary	228	*
510	Mr. Divyanshu Kumar	232	*
511	Mrs. Ayushi Shukla	318	*
512	Mrs. Vandana Cornelius	319	*
513	Akhilesh Kumar Tripathi	320	*
514	Mr. Devi Singh	321	*
515	Mr. Lovesh Kumar Tomar	323	*
516	Mr. Shravan Gupta	324	*
517	Mr. Vikas Kumar	325	*
518	Mr. Jeet Singh Nagar	327	*
519	Mr. Lalan Kumar Singh	328	*
520	Mr. Rajni Ranjan	329	*
521	Mr. Kulvendra Kumar	418	*
522	Mrs. Renu Bhatia	419	*
523	Miss. Bhawna	420	*
524	Mr. Anil Kumar Shukla	421	*
525	Mr. Shashi Bhushan Prasad Yadav	423	*
526	Mrs. Madhu Rani	424	*
527	Mrs. Rinki Singh	425	*
528	Mrs. Anita Kushwah	427	*
529	Mr. Amit Kumar Raghav	428	*
530	Mr. Harshit Goyal	429	*
531	Mr. Anil Kumar Gangwal	430	*
532	Mrs. Madhuri Kumari	432	*
533	Mr. Suraj Kumar	520	*
534	Mr. Manoj Bhola	521	*
535	Mr. Ajeet Kumar	523	*
536	Mrs. Meena Lohani	524	*

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537	Mr. Kanti Kumar Tyagi	525	*
538	Mrs. Nalini Rai	526	*
539	Mrs. Suman Kumari	527	*
540	Mr. Amit Kumar	529	*
541	Mr. Navin Kumar Rajak	531	*
542	Mr. Abhishek Kumar	532	*
543	Mr. Deep Narayan Yadav	533	*
544	Mrs. Preeti	618	*
545	Mr. Nripendra Kumar	619	*
546	Mr. Avinash Kumar	620	*
547	Mr. Satendra Singh	621	*
548	Mrs. Swati Sharma	622	*
549	Mr. Hitesh Kumar Dogra	623	*
550	Mrs. Anita Saini	624	*
551	Mr. Rohit Kumar Das	625	*
552	Mr. Vivek Kumar	626	*
553	Mrs. Neeru Burman	627	*
554	Mr. Sandeep Garg	628	*
555	Mrs. Manjari Tiwari	629	*
556	Mr. Manish Kumar Rai	632	*
557	Mr. Rajeev Ranjan	633	*
558	Mr. Nagesh Mishra	718	*
559	Mr. Ashok Kumar Singh	719	*
560	Mrs. Anju Kumari	720	*
561	Mr. Devesh Kumar Roy	721	*
562	Mrs. Imrana	722	*
563	Mr. Arun Kumar Singh	723	*
564	Mr. Abhay Kumar	724	*
565	Mr. Rajiv Kumar	725	*
566	Mr. Mohit Saxena	726	*
567	Mr. Mahesh Kumar Srivastava	727	*
568	Mr. Tarun Jaiswal	728	*
569	Ms. Geetu Sharma	729	*
570	Mr. Sourabh Kumar	730	*
571	Mr. Mohit Kumar	732	*
572	Mr. Mani Bhushan	733	*

573	Mr. Brijesh Mishra	818	*
574	Ms. Aradhana	819	*
575	Mr. Pankaj Kumar	820	*
576	Mr. Amit Kumar Mittal	821	*
577	Mr. Chandra Pal Singh	822	*
578	Mr. Deepak Kumar	823	*
579	Mr. Rikeshwer Prasad Dewangan	824	*
580	Mr. Chandan Kumar	825	*
581	Mr. Prashant Rawat	826	*
582	Mrs. Madhubala	827	*
583	Mr. Anand Kumar	828	*
584	Mrs. Rajni Jasuja	829	*
585	Mr. Pawan Gupta	832	*
586	Mr. Surendra Singh Tomar	833	*
587	Mr. Arun Kumar Gupta	918	*
588	Mr. Vipul Pathak	919	*
589	Mrs. Reeta Sharma	920	*
590	Mr. Niyaj Ahmad	921	*
591	Mr. Kunal Mishra	922	*
592	Mr. Rahul Mehta	923	*
593	Mr. Arun Kumar	924	*
594	Mr. Gawtham Gopi	925	*
595	Mrs. Vandana Pandey	926	*
596	Mrs. Mamta Kumari	927	*
597	Mr. B.L. Gulshan	929	*
598	Mr. Vivek Kumar Singh	930	*
599	Mr. Sudhir Kumar Singh	932	*
600	Mr. Gaurav Kumar Sharma	933	*
601	Mrs. Preeti	1018	*
602	Mr. Manoj Kumar Shakya	1019	*
603	Mr. Gaurav Kumar	1020	*
604	Mr. Abhijeet Anand	1021	*
605	Mr. Subhash Chander Sallan	1022	*
606	Mrs. Asha Bisht	1023	*
607	Mr. Prem Raj	1024	*
608	Mrs. Pallavi	1025	*

609	Mr. Anuj Kumar Singh	1026	*
610	Mr. Pankaj Tiwari	1027	*
611	Mr. Vipul Kumar	1028	*
612	Mr. Ritish Bajaj	1029	*
613	Mr. Rajnish Prabhakar	1030	*
614	Mr. Ankur Chourasia	1031	*
615	Mrs. Neha Nidhi	1032	*
616	Mr. Lavakush	1033	*
617	Mr. Praveen Kumar	1118	*
618	Mrs. Rekha	1119	*
619	Mr. Dinesh Singh	1120	*
620	Mr. Hitesh Sharma	1121	*
621	Mr. Pulkit Goel	1122	*
622	Mr. Arvind Panwar	1123	*
623	Mr. Niraj Kumar Dubey	1124	*
624	Mrs. Anubhuti Singh	1125	*
625	Mr. Kuldeep Gupta	1126	*
626	Mr. Hasan Alim Jan	1127	*
627	Mr. Kunal Gautam	1128	*
628	Mrs. Beenita Kumari	1129	*
629	Mr. Sunil Chandra Saha	1130	*
630	Mrs. Seema Jha	1131	*
631	Mr. Munna Kumar	1132	*
632	Mr. Sanjeev Kumar Gupta	1133	*
633	Mr. Akhil Kumar Rawat	1218	*
634	Mr. Manoj Kumar Singh	1219	*
635	Mrs. Mamta Kumari	1220	*
636	Mr. Sameer Bansal	1221	*
637	Mrs. Latika Gupta	1222	*
638	Mrs. Varsha Vishnoi	1223	*
639	Mrs. Mamta Tewari	1224	*
640	Mr. Anchal Kumar	1225	*
641	Mr. Mahendra Kumar Verma	1226	*
642	Mrs. Neha Rani	1227	*
643	Mr. Prem Prakash Tiwari	1228	*
644	Mr. Sahil Batra	1229	*

645	Mr. Deepak Sharma	1230	*
646	Mr. Alok Kumar Mishra	1231	*
647	Mr. Navin Kumar	1232	*
648	Mr. Chandresh Kumar	1233	*
649	Mr. Shoban Kalia	1418	*
650	Mrs. Sujata Kain	1419	*
651	Mr. Bhaskar Kanseri	1420	*
652	Mrs. Soniya Banarji	1421	*
653	Mr. Umesh Kumar	1422	*
654	Mrs. Tanvi Jain	1423	*
655	Mr. Kambod Singh	1424	*
656	Mr. Mukul Sharma	1425	*
657	Mr. Pappu Sharma	1427	*
658	Mr. Kumar Abhishek	1428	*
659	Mr. Himanshu Soni	1429	*
660	Mr. Kumar Jyotirmay	1430	*
661	Mr. Ramesh Kumar Kaul	1518	*
662	Mr. Raj Anand	1519	*
663	Mr. Rakesh Kr. Jha	1520	*
664	Mrs. Anshika Sharma	1521	*
665	Mrs. Dharam Devi Verma	1522	*
666	Mr. Gaurav Verma	1523	*
667	Tapash Roy Acharya	1524	*
668	Mr. Sant Sharan	1525	*
669	Mohd. Musharraf Ali	1526	*
670	Mr. Ashirwad Shrivastava	1527	*
671	Mr. Pawan Kumar	1528	*
672	Mrs. Rekha Gupta	1529	*
673	Mr. Nitin Rajput	1530	*
674	Mr. Poornendu Prakash Tiwari	1531	*
675	Mr. Mohd. Ayub	1532	*
676	Mr. Santosh Kumar Joshi	1533	*
677	Mr. Utsav Sharma	1618	*
678	Mrs. Shipra Kumari	1619	*
679	Mrs. Sonika Gautam	1620	*
680	Mr. Sandeep Kumar Diwakar	1621	*

681	Mr. Manish Kumar Kanth	1622	*
682	Mr. Aman Patel	1623	*
683	Mrs. Farheen	1624	*
684	Mr. Nishant Pathak	1625	*
685	Mr. Sabir Ali	1626	*
686	Mr. Santosh Kumar Gupta	1627	*
687	Mrs. Seema Tiwari	1628	*
688	Mr. Santosh Kumar Tiwari	1629	*
689	Mr. Dilip Bhuyan	1630	*
690	Mrs. Sarita	1632	*
691	Mr. Shakil Ahmad	1633	*
692	Mrs. Archana Jha	1718	*
693	Mr. Mayank Pathak	1719	*
694	Mr. Vijay Singh Sengar	1720	*
695	Mr. Rajesh Kumar	1721	*
696	Mr. Sudhanshu Kumar	1722	*
697	Mr. Rahul	1723	*
698	Mr. Manoranjan Kumar	1724	*
699	Mr. Liteshwar Sharma	1725	*
700	Mr. Mohit Nag	1726	*
701	Mr. Abhishek Gupta	1727	*
702	Mrs. Suparna Chaudhuri	1728	*
703	Mrs. Shakuntla	1729	*
704	Mr. Jaswant Singh	1730	*
705	Mr. Ashutosh Kumar Tiwari	1731	*
706	Mrs. Srabani Pahari Panda	1732	*
707	Mr. Pankaj	1733	*
708	Mr. Piyush Kumar Gupta	1818	*
709	Mr. Gaurav Dixit	1819	*
710	Mr. Sunil Kumar	1820	*
711	Mr. Jitendra Kumar Singh	1821	*
712	Miss. Shailaza Sharma	1822	*
713	Mr. Anand Singh Bisht	1823	*
714	Mr. Naval Kishore	1824	*
715	Mr. Rahul Maurya	1825	*
716	Mrs. Seeta Kandpal	1826	*

717	Mr. Raghvendra Singh	1827	*
718	Mrs. Khushboo Arora	1828	*
719	Mrs. Ashwini Chandrakant Gandge	1829	*
720	Mr. Debasish Mohanty	1830	*
721	Mr. Pradeep Thapliyal	1832	*
722	Mr. Ishan Kumar Chakraborty	1833	*
723	Mr. Ranjan Kumar	1918	*
724	Mr. Pardeep Mehra	1919	*
725	Mr. Shobhit Gupta	1920	*
726	Mr. Kamal Singh	1921	*
727	Mr. Kamal Kishore	1922	*
728	Mr. Hukam Singh	1923	*
729	Mr. Pintu Kumar	1924	*
730	Mr. Kumar Pranav Kaushik	1925	*
731	Mr. Rohit Mahore	1926	*
732	Mr. Abhishek Sharma	1927	*
733	Mr. Shivajeet Banarji	1928	*
734	Mrs. Poonam Chopra	1929	*
735	Mrs. Nidhi Gupta	1930	*
736	Mr. Shashank Ji Srivastava	1933	*
737	Mr. Ramkishor Sharma	2018	*
738	Mr. Bal Krishna Jha	2019	*
739	Mrs. Nidhi Rawat	2020	*
740	Mr. Rajendra Mahto	2021	*
741	Mr. Amit Kumar	2022	*
742	Mr. Devashish Rana	2023	*
743	Mr. Siddarath	2024	*
744	Mr. Mohit Kaushik	2025	*
745	Ms. Meenu Singh	2027	*
746	Mr. Pankaj Kumar Singh	2028	*
747	Mr. Kapil Walia	2029	*
748	Mr. Prasun Tiwari	2030	*
749	Mr. Amit Kumar Singh	2032	*
750	Mr. Pankaj Kumar	2033	*
751	Mr. Vijay Kumar Gupta	2118	*
752	Mrs. Kaushal Singh	2119	*

753	Shivani	2120	*
754	Mr. Pragati Srivastava	2121	*
755	Mr. Karan Bedi	2122	*
756	Mr. Niraj Kumar Gupta	2123	*
757	Mr. Jitin Arora	2124	*
758	Mr. Shubham Shukla	2125	*
759	Mr. Mudit Kumar	2126	*
760	Mrs. Prachi Agrawal	2127	*
761	Mr. Karan Jetly	2128	*
762	Mr. Benktesh Kumar	2129	*
763	Mrs. Ruby Thakur	2130	*
764	Mr. Pravin Kumar Dubey	2131	*
765	Mrs. Preeti Tiwari	2132	*
766	Mr. Pankaj Kumar	2133	*
767	Mrs. Disha Priyadarshini	2218	*
768	Mrs. Susmita Devi	2219	*
769	Mr. Rahul Ranjan	2220	*
770	Mr. Lal Singh Adhikari	2221	*
771	Mr. Dinesh Kumar Sharma	2222	*
772	Mr. Sudarshan Singh	2223	*
773	Mr. Abhinav Nanda	2224	*
774	Mr. Lalit Kumar Choudhary	2225	*
775	Mrs. Sapna Singh	2226	*
776	Mrs. Prity Kumari	2227	*
777	Mr. Hemant Raikwar	2228	*
778	Mrs. Sima Mishra	2229	*
779	Mrs. Deeksha Awasthi	2230	*
780	Mr. Vishal Kumar	2231	*
781	Mr. Kunal Kumar	2232	*
782	Mr. Divy Prakash Tiwari	2233	*
783	Mr. Abhijeet Mukherjee	2318	*
784	Mr. Jitendra Singh	2319	*
785	Mrs. Shobha Kumari	2320	*
786	Mrs. Savita Chawla	2321	*
787	Mr. Kaushal Singh	2322	*
788	Mr. Ratnesh Kumar Verma	2323	*

789	Mr. Mohammad Shafique	2324	*
790	Mr. Dewanshu Madan	2325	*
791	Mr. Alok Gupta	2326	*
792	Mr. Roshan Kumar Singh	2327	*
793	Mr. Sushil Chand Chaturvedi	2328	*
794	Mr. Subhash Chandra Jha	2329	*
795	Mr. Rohit Rathor	2330	*
796	Mr. Kundan Singh	2331	*
797	Mr. Dev Raj	2332	*
798	Mr. Vinay Kumar	2333	*
799	Mr. Shoaib Usmani	2418	*
800	Mr. Fazil Usmani	2419	*
801	Mr. Ajeet Singh	2420	*
802	Mrs. Maimoona Siddiqui	2421	*
803	Mr. Dharmendra Singh	2422	*
804	Mrs. Anshu Kumari	2424	*
805	Mr. Ankit Sharma	2425	*
806	Mr. Mohammad Qaseem Uddin	2426	*
807	Mrs. Rajni	2427	*
808	Dr. Yatendra Kumar Bansal	2428	*
809	Mr. Shubham Swapnil	2429	*
810	Mr. Apoorv Agnihotri	2430	*
811	Mrs. Priyanka Khanna	2431	*
812	Mr. Sumit Kumar	2432	*
813	Mr. Vipul Mehrotra	2433	*
814	Mr. Hazari Lal	2518	*
815	Mrs. Suman	2519	*
816	Mr. Anjay Kumar	2520	*
817	Mr. Praveen Kumar	2521	*
818	Mr. Ameesh Sharma	2522	*
819	Mr. Pradeep Kumar	2524	*
820	Mrs. Nirmla	2525	*
821	Mr. Vidya Nand Singh	2526	*
822	Mrs. Priyanka Kumari	2527	*
823	Miss. Aarya Gupta	2528	*

824	Mr. Rupesh Shrivastava	2529	*
825	Mr. Abhinav Singh	2531	*
826	Mrs. Prabhjot Kaur	2532	*
827	Mrs. Sunita Gusain	2533	*
828	Mrs. Priti Ray	2618	*
829	Mrs. Shweta Saxena	2619	*
830	Mr. Rakesh Kumar Singh	2620	*
831	Mr. Ajay Kumar Tiwari	2621	*
832	Mr. Hitesh Sharma	2622	*
833	Mr. Archit Rastogi	2624	*
834	Mrs. Pushpa Ray	2625	*
835	Mrs. Pratima Pandey	2626	*
836	Mrs. Moni Rani	2627	*
837	Mrs. Kumari Deepa	2628	*
838	M/S Bennett Coleman & Co. Ltd.	2629	*
839	M/S Bennett Coleman & Co. Ltd.	2630	*
840	Mr. Sumit Agarwal	2631	*
841	Dr. Geeta Shukla	2632	*
842	Mr. Shashank Shekhar Rai	2633	*
843	Mr. Himanshu Shrivastav	2718	*
844	Mr. Amit Sinha	2719	*
845	Mrs. Navita Yadav	2720	*
846	Mr. Raj Kumar Sharma	2721	*
847	Mrs. Tusharika Sharma	2722	*
848	Mr. Kailash Jagdeo	2724	*
849	Mr. Danish	2725	*
850	Mrs. Shikha Bajpai	2726	*
851	Mr. Rohit Himanshu Ranjan	2727	*
852	Mr. Kunal Porwal	2728	*
853	M/S Bennett Coleman & Co. Ltd.	2730	*
854	Mrs. Pratibha Negi	2731	*
855	Mr. Prateek Singh Chauhan	2732	*
856	Mrs. Nimi Kuchiya	2733	*
857	Mr. Ashok Kumar Gupta	2819	*
858	Mr. Shashank Joshi	2820	*
859	Mrs. Renu Mehra	2821	*

860	Mr. Bhanwar Lal Mandarwal	2822	*
861	Mrs. Seena Utk	2824	*
862	Mr. Devendra Pratap Singh	2826	*
863	Mr. Vikash Srivastava	2827	*
864	Mr. Abhilekh Kumar	2831	*
865	Mr. Jitender Singh Rawat	2832	*
866	Mr. Rajeev Sharma	2833	*
867	Mrs. Soma Singh	2919	*
868	Mrs. Seema Singh	2920	*
869	Mr. Prashanth Subramanian	2921	*
870	Mr. Abhishek Paul	2924	*
871	Mrs. Gulab Rani Rodiwal	2925	*
872	Ms. Shweta Jain	2926	*
873	Mr. Animesh Trivedi	2927	*
874	Mrs. Kavita Das	2930	*
875	Mr. Ranvir Singh	2932	*
876	Mr. Vishwakarma Bhagat	2933	*
877	Mr. Ambarish Bhattacharya	3022	*
TOTAL PROFITEERING			47,587,468

*No amount indicated in the Annexure-24 of the DGAP's Report dated 29.10.2021.

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