



AIFTA TIMES

Volume 9 – No. 2 • February 2018

FORTHCOMING PROGRAMMES

Date & Month	Programme	Place
17, 14, 21, 28-2-2018 and 7, 14-3-2018	Workshop on GST Laws	Mumbai
24-2-2018	Jammu Tax Conference	Jammu
17-3-2018	National Executive Committee Meeting	Vadodara
17, 18-3-2018	National Tax Conference	Vadodara

ACTIVITY REPORT OF CENTRAL ZONE FOR THE MONTH OF JANUARY 2018

- We are organising Tax Seminar on Union Budget at Rajasthan in Jodhpur, Bhilwara and Bikaner in February and in Madhya Pradesh at Bhopal and in Chhatisgarh at Bhilai in the next two months.
- New Members:** We have added 8 new members in the month of January.
- Pre-Budget Memorandum:** We have submitted pre-budget memorandum to State GST Commissioner Shri Raghvendra Singh at Bhopal for various problems. State level pre-budget Meeting was held on 17th January in the leadership of our ex-Chairman (CZ) Shri D. C. Mali and Vice-Chairman Shri Sudhir Bhansali had submitted representation to Hon'ble Finance Minister and Chief Minister of Rajasthan. In Rajasthan and in Madhya Pradesh also representation was submitted.
- Felicitation:** We have felicitated Mr. P. K. Ambastha, I.R.S. on 10th January our new Chief Commissioner of Income Tax, Jodhpur and Chief Commissioner of Income Tax, Bhopal Shri Prashant Kumar Dass on 4th January.
Felicitation of I.T.A.T. Member at Indore Bench Mr. Manish Burad who has joined as Accountant Member and Mr. Kul Bharat has joined as Judicial Member Federation were welcomed. Both of them assured fullest co-operation for smooth functioning of the Bench and also expected the same from us.
- Felicitation of Shri Ranjeet Joshi, on being elected continuous 14th times President of Rajasthan High Court Advocate Association and felicitated of Shri P. M. Chopra on becoming Vice-President of All India Federation of Tax Practitioners (CZ).
- Tax Seminar/Study Circle meeting held at Ujjain as well as Jodhpur in the month of January.
- Forthcoming Meeting:** We are organising Seminar on Union Budget in the month of February, 2018 at Jodhpur, Bhilwara, Chittorgarh, Dhar, Dewas, Burhanpur, Neemuch, Ratlam, Bhilai etc.

CA. Rajesh Mehta
Chairman

CA. Devendra Kansara
Secretary

REPORT ON WORKSHOP ON GST LAWS (WZ)

“Workshop on GST Laws” jointly with BCAS, CTC, GSTPAM, MCTC, and WIRC of ICAI has commenced covering 18 sessions on all Wednesdays from 17th January, 2018 up to 14th March, 2018. As we have received an overwhelming response from members, registration for the same is now closed.

FOR ANY QUERIES MEMBERS MAY CONTACT ANY OF THE FOLLOWING OFFICE BEARERS

Name	Mobile	Tel. (O)	Fax	E-mail
National President – Shri Ganesh Purohit, Sr. Adv.	9425154914	0761-2660402	4003074	purohitganesh@gmail.com
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Treasurer – Shri Vipul B. Joshi, Adv.	9820045569	022-66333736	22080951	vipulbjoshi@gmail.com

REPORT ON ONE-DAY SEMINAR (EZ)

All India Federation of Tax Practitioners – Eastern Zone conducted a One-Day Tax Seminar on Saturday, 20th January, 2018. Wide range of topics like GST, Benami Property, Insolvency & Bankruptcy Code concerning the current tax environment in the country were discussed by the eminent and learned speakers from all over the country. The Seminar was graced by Mr. Justice Malay Marut Banerjee, Chairman, West Bengal Taxation Tribunal along with Mr. Chanchal Mal Bachhawat, Technical Member, West Bengal Taxation Tribunal.

First Technical Session was on GST which was chaired by Mr Chanchal Mal Bachhawat, Technical Member, West Bengal Taxation Tribunal. Speakers were Mr. Pankaj Ghiya, Adv., Jaipur, CA. Arun Agarwalla, Kolkata. Mr Pankaj Ghiya deliberated on current issues of GST and the problems being faced. Mr. Arun Agarwalla deliberated issues relating to works contract.

Second Technical Session was on Benami Property which was chaired by Mr. Ganesh Purohit, Sr. Adv., Jabalpur and speaker was Dr. P. Daniel, Adv., Mumbai who deliberated on the current issues on Benami Property and the taxation issues involved in the same.

Third Technical Session was on Insolvency & Bankruptcy Code which was chaired by Sri. S.K. Poddar and the speaker was Mr. Rajiv Shankar Dvivedi, Adv., New Delhi who deliberated on the changes required in the act and the recent judgments on the said subject.

As per Mr. Vivek Agarwal and Mr. Bhaskar Sinha Roy, Hon. Jt. Secretaries of the zone the tax seminar was a small step towards discussion and solving the problems of the current taxation system. The said seminar was followed by the National Executive meeting of the Federation.

Mr. Bhaskar Sinha Roy & Mr. Vivek Agarwal
Hon. Jt. Secretaries

Heartiest Congratulations

Mr. Porus Kaka, Sr. Advocate, Member of AIFTP is the first Indian to be appointed as a member of the International Bureau of Fiscal Documentation (IBFD), Board of Trustees.

We wish him all the success.

Publications for sale

Sr. No.	Name of Publication	Edition	Rate (₹)		
			Members	Non-Members	Courier Charges
1.	“Income Tax Appellate Tribunal – A Fine Balance – Law, Practice, Procedure and Conventions – Frequently Asked Questions”	Dec., 2017	1,000.00	1,050.00	100.00
2.	AIFTP – Of Milestone and Beyond – History Book	Nov., 2016	400.00	450.00	80.00

- Notes:
1. The above publications are available for sale; those who desire to buy may contact the office of the Federation.
 2. Local/Outstation members not collecting from office are requested to add courier charges, as mentioned above.
 3. Please draw Cheque/Draft in favour of “All India Federation of Tax Practitioners” payable at Mumbai.

Publications from AIFTP Western Zone for sale

Sr. No.	Name of Publication	Edition	Rates (₹)		
			Members	Non-Members	Courier Charges
1.	Limited Liability Partnership simplified through – Frequently Asked Questions	Nov., 2016	200.00	225.00	60.00
2.	Levy of Penalty u/s. 271(1)(c) – Some Important Issues	Nov., 2016	200.00	225.00	60.00

- Notes:
1. The above publications are available for sale; those who desire to buy may contact the office of the Federation.
 2. Local/Outstation members not collecting from office are requested to add courier charges, as mentioned above.
 3. Please draw Cheque/Draft in favour of “All India Federation of Tax Practitioners – Western Zone” payable at Mumbai.

TWO-DAY NATIONAL TAX CONFERENCE AT VADODARA (WZ)

The All India Federation of Tax Practitioners (WZ) has jointly organized Two-Day National Tax Conference with NEC at Vadodara with Central Gujarat Chamber of Tax Consultants and Gujarat Sales Tax Bar Association.

Days and Dates : Saturday & Sunday, 17-3-2018 and 18-3-2018

Venue : Mercury Surya Palace, Sayajigunj, Vadodara.

The conference will discuss the important and latest issues on GST and Direct Taxes. The details of the eminent faculties, speakers and trustees would be hosted on AIFTP's website and will be circulated amongst members by e-mail.

This is an advance intimation to enable the members to book their travel to and fro Vadodara.

Note : The detailed circular will follow.

JAMMU TAX CONFERENCE (NZ)

The North Zone of The All India Federation of Tax Practitioners along with Tax Bar Association, Jammu is organising the first ever One Day Conference in the Holy City of Jammu on Saturday 24th February, 2018. On the next day i.e., Sunday 25th February the hosts are facilitating Darshan at the holly Shrine of Mata Vaishno Devi.

Venue of Conference : Hotel K. C. Residency, Residency Road, Jammu 180 001

Date & Time : Saturday, 24th February, 2018 .

Inaugural Session : 10.30 a.m. to 11.15 a.m.

1st Technical Session : 11.30 a.m. to 1.30 p.m.

Lunch : 1.30 p.m. to 2.30 p.m.

2nd Technical Session : 2.30 p.m. to 4.30 p.m.

Followed by High Tea

Delegate Fees : ₹ 1,500/- (Rupees Fifteen Hundred only), Cheques/Drafts may be drawn favouring "Jammu Tax Conference" and may be sent to Mr. Sunil Sharma, Advocate, President Tax Bar Association Jammu, Near Excise and Taxation Complex, Rail Head Complex, Panama Chowk, Jammu 180004 J & K. along with the details of the delegate. Delegates who are intending to visit Mata Vaishno Devi on Sunday, 25th February, 2018 may confirm by 15th February to enable the hosts to make adequate comfortable arrangements of transfer from Jammu to Katra which is approximately 2 hours drive.

Apart from walking, the options available from Katra to Shrine are horseback and Palki both are almost 3-4 hours uphill and 2-3 hours downhill which are comfortable and safe because now the infrastructure is excellent. Battery operated cars are available to and from Ardhkawari (halfway) to Bhawan and helicopter services from Katra is available online only on the site of the Mata Vaishno Devi Shrine Board (<https://www.maavaishnodevi.org>).

The weather is expected to be very pleasant in Katra but cold in the evening and at the Bhawan (Shrine), so one should carry woollens, a raincoat and a good comfortable pair of walking shoes. It is advisable to stay in Katra for 25th night, there are many good, chain and Star Hotels. There are several flights to and from Jammu to various cities and direct trains are available from Katra to Delhi. Delegates who intend visiting Mata Vaishno Devi are advised to book return journey for Monday, 26th February 2018. The Conference details and list of few good hotels at Jammu and Katra shall be provided as soon as finalised.

Mr. Sanjay Kumar **Mr. Sunil Sharma**
Chairman (NZ) President TBA Jammu
9415216798 9419105350
9936798866 9070505350
E-mail : jammutaxconference@gmail.com

Co-ordination Committee
Mr. Vikas Chopra 9419128160
Mr Amit Gupta 9419116108
Mr. Bageshwar Khajuria 9419156890

Delegate Fee: ₹ 1,500/- for online payment the bank details are as under:
J&K Bank, Panama Chowk Branch, Jammu SB A/c No. 0022010100000369, IFSC:JAKAOERAILH

Kindly send the scanned copy of the NEFT transfer slip/screen shot for verification with our bank along with your contact details

Subscription Rates w.e.f. 1-4-2014

1. Life Membership of the AIFTP					₹ 2,500/-*
ID Card Fees					₹ 100/-*
Subscription of AIFTP Journal (for 1 year)					₹ 800/-
Subscription of AIFTP Journal (for 3 years)					₹ 2,100/-
2. For Non-Members					
Subscription of AIFTP Journal (for 1 year)					₹ 1,000/-
Subscription of AIFTP Journal (for 3 years)					₹ 3,000/-
Single copy of the AIFTP Journal					₹ 80/-
3. Corporate Membership					
Nature of fees	Type I (5 Yrs.)	Type II (10 Yrs.)	Type III (15 Yrs.)	Type IV (20 Yrs.)	
Admission	500/-*	500/-*	500/-*	500/-*	
Subscription	5,000/-	7,500/-	11,500/-	15,000/-	
Total	5,500/-	8,000/-	12,000/-	15,500/-	

Note: Members may download the membership form from the website of AIFTP., i.e., www.aiftponline.org

* 18% GST as applicable.

Advertisement Tariff for AIFTP Journal (W.e.f. 15th July, 2013)

	Particulars	Per Insertion
1.	Quarter page	₹ 1,500/-
2.	Ordinary half page	₹ 2,500/-
3.	Ordinary full page	₹ 5,000/-
4.	Third cover page	₹ 7,500/-
5.	Fourth cover page	₹ 10,000/-
There shall be Discounts on bulk advertisements.		

Membership of AIFTP as on 20-1-2018 Life Members

	Associate	Individual	Association	Corporate	Total
Central	0	967	24	3	994
Eastern	4	1375	36	3	1418
Northern	0	1081	17	0	1098
Southern	1	1208	19	8	1236
Western	4	2270	37	18	2329
Total	9	6901	133	32	7075

OBITUARY

We regret to inform you, about the untimely death of our beloved accountant **Shri Arun Kaushik** on 2nd January, 2018. Shri Kaushik, a Chartered Accountant, was a very sincere and hardworking professional and was an invaluable asset for the AIFTP. He was also a life member of AIFTP. He passed away due to heart valve problems and was in ICU for around 15 days. He has left behind his widow mother aged around 75 years.

In the meeting of National Executive Committee held on 20th January, 2018 at Kolkata, Members present on the spot collected ₹ 69,100/- as a part of compensation for his dedicated services. Those who wish to contribute may do so by contacting our Manager, Mr. Ravindra Patade.

Vipul B. Joshi
Treasurer

We regret to inform you the sad demise of our Managing Committee member of Western Zone **Shri Satish Boob** from Nashik had suffered with massive heart attack and passed away at Istanbul on 30th January 2018.

May Almighty to rest his soul in eternal peace.

DIRECT TAXES

Ms. Neelam Jadhav, Advocate, KSA Legal Chambers

UNREPORTED DECISIONS

High Court

1. S. 14A : Revenue reduced quantum of disallowance u/s. 14A and assessee accepted it, Cross-objection filed after 4 years against the revenue appeals is not proper and correct

The assessee's appeals were subjected to disallowance u/s. 14A and appeal filed to the CIT(A). The CIT(A) granted limited relief as to the quantum. The revenue filed an appeal before ITAT and during the pendency of appeals, the assessee filed a cross-objection regarding the same and submitted that exempt income for which disallowance was made u/s. 14A was by way of investment in subsidiary for business purposes and not for investment purposes and therefore disallowance was not warranted. The cross-objection filed by the assessee was delayed by 1,400 days, hence the ITAT refused to condone the delay regarding cross-objection of the assessee.

The High Court held that assessee did not prefer either an appeal or a cross-objection within the time stipulated and filed belated cross-objections after four years. The appeals were preferred in 2011 by the Revenue and the appellant in the light of *CIT v. Holcim India (P) Ltd.*, woke up and chose to approach the ITAT after 4 years, therefore the belated cross-objections filed by appellant is not correct and not as per law.

Jubilant Securities Pvt. Ltd. v. Dy. CIT ITA 1000/2017 & CM No. 41760/2017, dated 10/1/2018 (Delhi)(HC) Source : delhihighcourt.nic.in

Tribunal

2. S. 28 : Business Income – Licence Fee collected by tenant while sub-letting property is not assessable as House Property Income (r.w.s. 22)

Assessee is deriving income from sub-letting of properties as well as from letting out properties owned. The assessee has collected licence fee from the tenants not only for use of the premises but has also provided other services like installation of a transformer, providing lighting in common area, deployment of security personnel and other facilities and the same treated under the head business income by holding that it was carrying out regular activity. The said claim of the assessee was rejected by the AO.

The Hon'ble ITAT held that licence fee collected by the tenant while sub-letting the property should be treated as business income and cannot be treated under the head income from house property as the assessee in the present case was not the real owner of the property.

I.T.O. v. M/s. Batram Properties Pvt. Ltd. I.T.A No. 984/Kol/2016 dated 12/01/2018 (Kol.)(Trib.) Source: www.itat.nic.in

3. S.69 : Share application money cannot be treated as unexplained, if the AO failed to make investigation on documentary evidences filed

The AO noticed that the assessee has received fresh share application money from investors. The assessee was asked to furnish evidence in support of the genuineness of the share application money. In response, the assessee submitted all the supporting documents for genuineness of the share application received from the investor including name of the party, address, PAN, bank statement etc. without considering the same the AO confirmed the addition stating that the assessee has failed to prove the financial capacity of the investor.

The Hon'ble ITAT held that the assessee company produced sufficient documentary evidence before AO to prove the source of share application money and it is clear that the AO failed to conduct any enquiry and scrutiny of the documents at assessment stage, AO did not perform his duties at the assessment level and made addition in the hands of the appellant. Held that when assessee discharged initial onus to prove identity of the Investor including its creditworthiness and genuineness of the transactions, then AO has no right to made any addition and cannot treat the share application money as unexplained.

M/s. TRN Energy Pvt. Ltd. v. ACIT, ITA No.453/Del/2016 & CO 96/Del/2016 dated 1-1-2018 (Delhi)(Trib.) Source : www.itat.nic.in

4. S.194H : Brokerage or commission paid in connection with share transaction is not liable for TDS

Assessee is a Private Ltd. Company. During the assessment, the AO found that the assessee had paid sub-brokerage to its agents for doing share business in its name and he also disallowed the expenses of the said amount. The view of the AO that the sub-brokerage given to the agents was for doing business and not for sale of shares and securities. Therefore, it cannot be said that the sub-brokerage was against brokerage on securities, but it was for doing business on behalf of the company as its agents, which was fixed on the basis of the volume of the transactions, Hence, TDS on such payments should have been deducted.

The ITA held that assessee maintained that as per s.194H TDS was not deductible on brokerage on securities. Brokerage/commission paid in connection with the securities was not liable for deduction of tax at source, as mentioned in explanation 1 of section 194H. Further, the brokerage paid in connection with the services rendered in the course of business of buying and selling of units of mutual fund or in relation to transactions pertaining to mutual fund is not covered by provisions of tax at source in view of the explanation section (i) to s.194H. Therefore, brokerage or commission paid in connection with share transaction is not liable for TDS.

SPT Securities Pvt. Ltd. v. DCIT ITA No.265/Kol/2016 dated 12-1-2018 (Kol.)(Trib.) Source : www.itat.nic.in

INDIRECT TAX DECISIONS – VAT UPDATE

CA. Janak Vaghani

1. GST – Detention of goods not permissible for Technical Breach of E-Way Bill Provisions when goods are not taxable

Under section 7 of the State GST Act when a taxable person transports the goods procured by it for its own use to the site where the goods are to be consumed, the transaction would not fall within the scope of taxable supply. Under sections 129 and 130 of the Act the goods which are liable to be confiscation can only be detained and the goods can be confiscated when a taxable supply is made. Therefore, the goods cannot be detained when there is no taxable supply for infraction of procedural rules like rules 55 and 138 of State GST rules. Although it may attract penal provisions.

[Source: *Indus Tower Ltd. v. State of Kerala*, W.P.C. No. 196 of 2018 dated 17th January, 2018 (Ker)].

2. Illegal Search – Penalty imposed on VAT official

The Delhi High Court having considered the nature of lapse and also to ensure that such instances are not repeated imposed the penalty of ₹ 50,000 upon the VAT officials out of which ₹ 25,000 payable to the petitioner and balance amount to be deposited with Delhi State Legal Services Authority.

[Source: *Teleworld Mobiles Pvt. v. Commissioner of Trade Tax*, W.P.C. No. 5583/2016, dated 8th January, 2018 (Del.)]

3. SLP dismissed

The SC dismissed the SLP filed against the Delhi High Court judgment in case of *Arise India* and Ors. However, the department was given a liberty to approach the High Court in case where the transactions is not genuine. In that case the High Court read down the section 9(2)(g) of the Delhi VAT Act for disallowing the ITC

for non-payment of tax by selling dealer. The Delhi High Court had allowed the ITC when the transaction was genuine, but the tax was not paid by the selling dealer.

[Source: *Commissioner of Trade Taxes v. Arise India Ltd.*, SLP (c) No. 36750/2017, dated 10th January 2018 (SC)]

4. Sale of zip fastener to manufacturer of readymade garments for export is exempt u/s. 5(3) of the CST Act

The sale of zip fasteners to a manufacturer of readymade garments who has fixed in the garments and exported the garments outside the India is inextricably connected with transaction of export as such exempt from payment of tax under section 5(3) of the CST Act, 1956.

[Source: *M/s. Zip Industries Ltd. v. The Commercial Tax Officer*, 2018 VIL 22 (Mad.)].

5. Rate of tax sale of mobile charger with mobile

In the absence of any procedure or provision in the UP VAT Act conferring such authority, in case of a sale of composite packages bearing a singular MRP like mobiles, the authorities under the 2008 Act cannot possibly assess the components of such a composite package separately like charger. A holistic reading of Entry No. 28 of Schedule-II, Part B of UP VAT Act clearly establishes an inseparable link between the cell phone and its MRP. It is this which forms the basis and measure for taxability. In view thereof, the charger contained in a composite package cannot be held to be exigible to tax separately. The decision of SC in case of *Nokia India* was not followed.

[Source: *M/s. Samsung (India) Electronics Pvt. Ltd. v. Commissioner of Commercial Taxes*, 2018-Vil-41-(All.)].



SERVICE TAX CASES

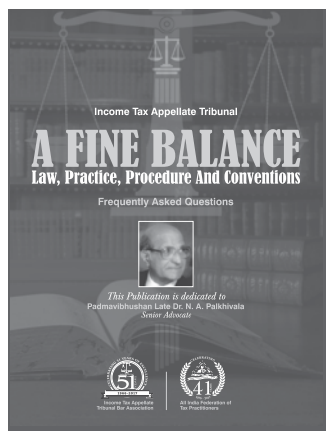
S. S. Satyanarayana, Tax Practitioner, Hyderabad

Export of Service : Verizon India is a company incorporated under the provisions of the Companies Act, 1956 and is registered with the Service Tax Department ('Department') under the category of 'Business Support Services'. Verizon India entered into a Master Supply Agreement with Verizon US for rendering connectivity services for the purpose of data transfer. Verizon US is a company located outside India, *inter alia* engaged in the provision of telecommunication services for which it enters into contracts with its customers located globally. The Indian company claimed refund of unutilised CENVAT credit lying in its account on the ground that it had used various input services in providing output services viz. Business Support Services, exported out of India to Verizon. Five of these refund claims were for the period from January 2011 to March 2012; one for period April to June 2012 and nine for the period July 2012 to September 2014.

The refund claims were rejected by the Assistant Commissioner, Service Tax by three separate orders dated 12th September, 2016 on the ground that the services provided by Verizon India do not qualify as 'export of services' as they are provided within India. Reference was made to Circular No. 90/1/2007-Service Tax dated 3rd January, 2007 and Circular No. 141/10/2011-TRU dated 13th May, 2011. Held: The position becomes clearer in the post July, 2012 period during which the POPS Rules, 2012 apply. Provision of telecommunication services does not have a specific rule and so Rule 3 of the POPS Rules, which is the default option, applies. In terms thereof, the place of provision of telecommunication service shall be the location of the recipient of service. Hence refund allowed. [*Verizon Communication India P. Ltd. v. AC, Service Tax Delhi III – 2017 (9) TMI 632 – Delhi High Court*].



BOOK RELEASE ANNOUNCEMENT



The All India Federation of Tax Practitioners and ITAT Bar Association, Mumbai, have jointly published a Book titled “**Income Tax Appellate Tribunal – A Fine Balance – Law, Practice, Procedure and Conventions - Frequently Asked Questions**”, dedicated to Padma Vibhushan Late Dr. N. A. Palkhivala, Sr. Advocate. A research team of lawyers, chartered accountants and an editing team consisting of Senior Advocates and Advocates who are regularly appearing before the ITAT have made their contributions in this publication. Hon’ble Justice Mr. Dipak Misra, Chief Justice of India, has released the said publication on 2-12-2017 at Jabalpur.

**Hurry up !
Few copies available**

This is a unique publication compiled in a question-answer format explaining the provisions, laws, conventions etc. answering around

406 questions by giving references to relevant case laws on the respective subject.

The publication is divided into 36 Chapters viz., Income tax Appellate Tribunal, including subjects such as:

- Representation before the Appellate Tribunal
- Checklist for filing appeal
- Specimen ground of Appeal, Stay Application and Miscellaneous Application
- Reference to Finance Acts and Circulars explaining the provisions since 1936 to 2017
- Conventions to be followed by the members of the Bar
- Minutes of the Meetings with Hon’ble Presidents and Vice-Presidents and the discussions with respect to various issues faced and the amendments in procedures following such discussions (which will not be available in any of the publications or websites)
- Suggestions made by Registrar of ITAT from time-to-time
- ‘My “Ideal” Tribunal Member’ and ‘Is Court Reference is Formality’, by S. E. Dastur, Sr. Advocate
- ‘Principle of good representation before ITAT’, by Dr. K. Shivaram, Sr. Advocate (which contains about how Dr. Palkhivala, who hailed from a humble middle class working family, became one of the greatest lawyers and legends of our country, Persuasive Skill of Mr. R. J. Kolah, High Reputation of Mr. S. P. Mehta, hard work of Mr. D. M. Harish and many more practical tips to achieve success in tax litigation practice)
- Do’s and Don’ts (Do not argue loudly)

This scholarly publication will be a useful reference for the Lawyers, Chartered Accountants, Tax Practitioners, Departmental representatives, to better understand the law and procedure relating to Appellate Tribunal.

This publication would be an invaluable treasure in the library of tax professionals.

The price of publication is ₹ 1,250/-.

For members, the publication will be available at a discounted price of

₹ 1,000/- and others at ₹ 1,050 /-.

Courier charges for the publication will be ₹ 100/- extra.

Those who desire to purchase the book may contact:

Mr. Ravindra Patade, Manager,

All India Federation of Tax Practitioners

215, Rewa Chambers, 31, New Marine Lines, Mumbai – 400 020.

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STATEMENT AS PER PRESS AND REGISTRATION OF BOOKS ACT
FORM IV
[See Rule 8]

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I, Shri Kotecha Mitesh Ashwin, hereby, declare that the particulars given above are true to the best of my knowledge and belief.

Date : 27-1-2018.

KOTECHA MITESH ASHWIN
Signature of the Publisher

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