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FORTHCOMING PROGRAMMES					
Date & Month	Programme	Place			
17th February, 2021	National Executive Committee Meeting	Virtual Zoom Platform			
17th & 18th February, 2021	Virtual National Tax Conference	Virtual Zoom Platform			
10th April, 2021	National Executive Committee Meeting	Puri, Odisha			
10th & 11th April, 2021	National Tax Conference	Puri, Odisha			
August, 2021	National Executive Committee Meeting & National Tax Conference	Thrissur/Ernakulam			
1st, 2nd, 3rd October, 2021	National Executive Committee Meeting & National Tax Conference	Katra (Jammu)			

#### VIRTUAL NATIONAL TAX CONFERENCE

17th & 18th February, 2021

REGISTRATION All India Federation of Tax Practitioners (WZ) The Goods And Services Tax Practitioners' Association of Maharashtra Vidharbha Tax Practitioners' Association • Central Gujarat Chamber of Tax Consultants

#### **CONFERENCE SCHEDULE**

Day 1 – 17th February, 2021			
10.15 am to 10.55 am	Inaugural Session Chief Guest : Hon'ble Justice Shri P. P. Bhatt, President, Income Tax Appellate Tribunal		
11:00 am to	1st Technical Session		
1:00 pm	Implications of Union Budget on Direct Taxes Speaker: CA. Pradip Kapasi, Mumbai Chairman: Dr. K. Shivaram, Sr. Adv., Mumbai		
02:00 pm to	2nd Technical Session		
4:00 pm	Recent Changes and Budget Implications on GST Speaker: Mr. Pankaj Ghiya, Adv., Jaipur Chairperson: Mrs. Nikita R. Badheka, Adv., Mumbai		

Day 2 – 18th February, 2021		
10:30 am to	3rd Technical Session	
12:30 pm	GST Audit and Annual Return for F.Y. 2019-20 Speaker: CA. Abhay Desai, Vadodara Chairman: CA. Deepak Thakkar, Mumbai	
02.30 pm to	Brains' Trust Session	
4.30 pm	Chairman: Mr. P. C. Joshi, Adv., Mumbai Direct Tax Trustees: Mrs. Prem Lata Bansal, Sr. Adv., New Delhi CA. Dhinal Shah, Ahmedabad Indirect Tax Trustees: Mr. Jatin Harjai, Adv., Jaipur Mr. Uchit Sheth, Adv., Ahmedabad	

Members are requested to send Brains' Trust Queries at aiftpwz@gmail.com on or before 08.02.2021.

For further queries about conference, please contact any of the following members

Mr. M. Srinivasa Rao, National President, AIFTP	9885796999	Mr. Pravin R. Shah, Chairman, AIFTP (WZ)	9821476817
Mr. S. S. Satyanarayana, Secretary General, AIFTP	9989924646	Mr. Raj P. Shah, President, GSTPAM	9867368285
Mr. Radheshyam Paliwal, President, VTPA	9423104472	Adv Kaushik Vaidya, President CGCTC	9824251425

Shri Samir Jani, Conference Chairman,	Shri Vinayak Patkar, Co-Chairman,	Shri Aditya Seema Pradeep, Chief Co-ordinator,
9825037365	9223401078	7507285285

FOR ANY QUERIES MEMBERS MAY CONTACT ANY OF THE FOLLOWING OFFICE BEARERS						
Name Mobile Tel. (O) E-mail						
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Treasurer - CA. Vijay Narayan Kewalramani	9820073165	022-25372532	info@kewalramani.in			

#### NATIONAL TAX CONFERENCE AT PURI, ODISHA

10th & 11th April, 2021

HOSTED BY

## THE ALL INDIA FEDERATION OF TAX PRACTITIONERS-EAST ZONE (AIFTP-EZ) alongwith

#### THE ALL ODISHA TAX ADVOCATES ASSOCIATION (AOTAA)

It will be held at STERLING RESORT, PURI. (The best resort in Puri with a private beach)

Other than the technical sessions, there will be visits to the Lord Jagannath Temple, Puri and the Sun Temple, Konark sponsored by the Host Association.

You can have morning walks on the beach and sea bathing with life guards. Yoga classes are also being arranged on the beach. Enjoy Oriya cuisine and delicacies. Also partake of the Prasad which is steam cooked in the kitchens of the Jagannath Temple which is the largest kitchen in the world. Have a trip to Satapada to watch the Irawady Dolphins.

Get entertained with Odissi dances and live music and dance.

Come to Puri, relax, learn, enjoy and take back fond memories of fellowship.

We will get back to you with further details.

#### ANNOUNCEMENT

Respected Members,

The Constitution Committee held its first meeting on Sunday 17th January, 2021 under the Chairmanship of Dr. Ashok Saraf, Past President.

The Committee has decided to request the members to provide suggestions for proposed amendments to the Constitution of AIFTP so that they can be discussed and incorporated in the Constitution.

Kindly send the proposed amendments to the Constitution to aiftpho@gmail.com latest by 5 pm on Sunday 28th February, 2021.

Regards

For and On behalf of the Constitution Committee

Sd/-

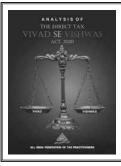
Adv Sanjay Kumar

Convenor,

Constitution Committee

Note: Members can download the copy of our "Memorandum of Association and Rules and Regulations" i.e. Constitution from our website. The link is as under:-

https://aiftponline.org/wp-content/uploads/2018/Constitution-of-AIFTP/new-constitution-of-aiftp.pdf



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Subject – Vivad Se Vishwas Act, 2020

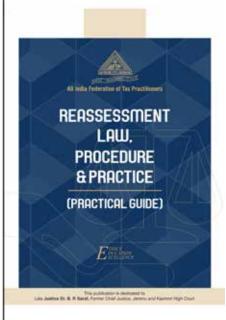
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Authored by Vipul Joshi & Dinkle Hariya, Advocate

Price ₹ 500 + GST ₹ 90 = ₹ 590/-

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### About Latest Publications of AIFTP



We are pleased to announce the release of the E-publication by the All India Federation of Tax Practitioners titled "Reassessment – Law, Procedure & Practice (Practical Guide)" by Hon'ble Mr. Justice Vineet Saran, Judge, Supreme Court of India at 23rd Virtual National Convention held on 5th December, 2020.

This is a unique publication which is dedicated to the fond memory of Honourable Justice Late Dr. B. P. Saraf, Former Chief Justice, Jammu and Kashmir High Court.

This publication is edited by Dr. K. Shivaram, Sr. Advocate, Mumbai, who has shared his experience and knowledge. This publication is authored by Shri Ajay R. Singh, Advocate, Mumbai, who appears regularly before the ITATs and the Hon'ble High Courts across India.

This publication was designed taking feedback from the readers of the detailed article on "A Comprehensive Guide to the law of Reopening of assessments" published in the years 2012 and 2018 on AIFTP journal/ www.itatonline.org. It had received a great response that a updated article was again published in July 2020 in www.itatonline.org. Considering overwhelming response the publication committee of the AIFTP proposed a comprehensive publication for the benefit of tax professionals. This publication has 26 chapters.

This Print edition has taken shape after an extensive research on the subject undertaken by Ajay R. Singh, Advocate under guidance of Dr. K. Shivaram Senior Advocate.

It is a unique publication in simple language simplifying and explaining step wise various issues relating to reassessment, right from issuance of notice by the Assessing officer. The author has explained step wise procedure to be followed on receipt of such notice, remedies available and care to be taken while drafting reply to the notices. This publication covers the widest possible expanse of the subject in all its finer aspects.

The list of legal principle culled out from various decisions and independent chapter on each issue are immense value addition to this publication. The exhaustive contents of the book are aimed at providing research based comprehensive and issue wise write up on the subject of reassessment. The subject wise and section wise index will aid in swift search of case laws on the issue.

All important concepts and propositions affirmed by various Courts and Tribunals has been analysed and discussed threadbare. All important Case laws on each issue are selected having precedent values which are very much relevant to the tax practitioners and tax payers across the country.

The subject wise and section wise index will aid in swift search of case laws on the issue. This publication will serve as a useful reference to tax professionals, tax payers and also tax administration.

This publication will serve as a useful reference to the tax professionals in their day-to-day practice.

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

#### The publication is free to all.

Please find below the link, from where you can download the pdf file of the said E-Publication and also view the same in flip format.

https://aiftponline.org/wp-content/themes/the-bootstrap/reassessment/

We are also pleased to announce that the author has agreed to answer issues relating Reassessment upto 31-1-2021. Questions may be e-mailed to aiftpho@gmail.com

Also hard copies are available in our Office and is given FREE to Members from office of the Federation. Outstation Members may send their request to the HO with the courier charges of Rs. 100/- only. The publication shall be supplied on First come first serve basis till the stock exists.

Please make all cheques / draft payable to "All India Federation of Tax Practitioners". Kindly get confirmation of availability of the publication from the office of the Federation before sending the courier charges.



We are pleased to announce the release of the E-publication by the All India Federation of Tax Practitioners titled "151 Landmark Judgements of the Honourable Supreme Court of India (Direct Taxes, Indirect Taxes and Allied Laws) – 151 years of Mahatma Gandhi".

The E-publication was released by Hon'ble Mr. Justice Rajesh Bindal, Judge, Jammu and Kashmir High Court alongwith Hon'ble Mr. Justice, Ujjal Bhuyan, Judge, Bombay High Court, Hon'ble Dr. Justice Anita Sumanth, Judge, Madras High Court, Hon'ble Mr. Justice Kalyan Rai Surana, Judge, Guahati High Court, Hon'ble Mr. Justice Piyush Agrawal, Judge, Allahabad High Court and Hon'ble Mr. Justice Soumitra Saikia, Judge, Guahati High Court at Virtual Two Day National Tax Conference on 2nd October, 2020 organised by AIFTP (NZ).

This is a unique publication which is dedicated to the fond memory of Honourable Justice Late Dr. B. P. Saraf, Former Chief Justice, Jammu and Kashmir High Court.

The Editorial Team for the publication consists of various seniors in the profession, who has shared their experience and knowledge. This publication is authored by various professionals across the country, who appears regularly before the ITATs and the Hon'ble High Courts across India.

This publication is divided in to two parts. First part of the publication deals with 101 landmark judgements of the Hon'ble Supreme Court of India on direct taxes which are digested section

wise. Some of the judgments which are dealing with Indian Income-tax, 1922, still holds good while interpreting the Income-tax Act, 1961. For ready reference corresponding reference of, Income-tax, 1961 are referred on the second part 50 land mark judgements of the Honourable Supreme Court are digested on Indirect taxes and Allied laws. The digested cases on indirect taxes will be relevant for the interpretation of Goods and Services taxes.

In this publication Land mark of Judgements from 38 Acts are digested. Speech of Honourable Prime Minster of India Shri Narendra Modi, to mark 150 Birth Anniversary of Mahatma Gandhi at UN. on 25-9-2019, Messages from Honourable Judges and 151 Quotations of Gandhiji Bapuji which are cited in this publication will serve as an inspiration to the readers.

Editorial note by the editorial team on each case are immense value addition to this publication.

Cases laws digested on Allied laws are selected on the basis of important Acts which are very much relevant to the tax practitioners and tax payers across the country.

The index to case laws s prepared in alphabetical order. For instance the revenue is the petitioner/applicant the index is shown as under:

Case: Presented in index case laws as:

CIT v. Raja Benoy Kumar Sahas Roy - Raja Benoy Kumar Sahas Roy; CIT v.\*

UOI v. U.A.E. Exchange Center - U.A.E. Exchange Center; UOI v.\*

Kale Khan Mohammad Hanif v. CIT - Kale Khan Mohammad Hanif v. CIT

The subject wise and section wise index will aid in swift search of case laws on the issue. This publication will serve as a useful reference to tax professionals, tax payers and also tax administration.

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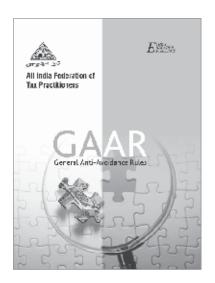
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The price of publication is  $\approx 800$ /-



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### **Direct Taxes**

Ms. Neelam Jadhav, Advocate, KSA Legal Chambers

#### **Tribunals**

### S.32: 60% Depreciation allowable on Xerox Machine as it's an integral part of the computer system which helps printing from the computer connected with it.

The Assessing Officer during the Assessment proceedings observed that, the assessee has claimed depreciation at the rate of 60% on Xerox machine, whereas in his opinion depreciation at the rate of 15% is available on these printers, Xerox - machine, etc. Hence, he disallowed the deprecations. The CIT (A) also confirmed the disallowance on the Xerox machine.

The Tribunal observed that, the assessee is entitled to depreciation at the rate of 60% on Xerox machine on the grounds that the true nature of this asset. It treated as a photo-state machine, according to the manual, it is a multi-functional printer. Its feature to make a photo-state of a paper is an added activity. Its feature to make photo-state of a paper is an added activity. Therefore, the 60% depreciation on Xerox machines is allowable to the assessee.

Dimple Vishal Agrawal v. ITO, ITA No.251/Ahd/2020, dt.09/12/2020 (Ahd.)(Trib.) Source: www.itat.nic.in

### S.68: Cash Credit - Mere low declaration of Income by Creditors, additions cannot be made in the hands of assessee in respect of Unexplained Cash Credit.

The assessee company, engaged in the business of Investment and Trading in Shares. During the Assessment proceedings, the Assessing officer noted that assessee has taken loan from 11 parties in assessment year under appeal. Hence, he issued notices u/s. 133(6) of the Income Tax Act to all the parties requiring them to furnish copy of the bank statements, PAN etc. During the Assessment, the Assessing officer noted that notices could not be served upon the two creditors and assessee submitted a copy of the ledger account, confirmations by the parties along with their ITR and other details. The Assessing officer without making further enquiry considered them as unexplained credits and made addition in respect of both the creditors.

While deciding the issue Tribunal observed that, the assessee has initially prove the burden to creditworthiness of the creditors and genuineness of the transaction have discharged. The assessee has proven that both the

creditors have availability of sufficient funds to give loan to the assessee in assessment year under appeal. Merely because income was low declared by both the creditors, is no ground to make the impugned addition against the assessee-company. Further observed that since the Assessing officer accepted the creditworthiness and genuineness of the transaction with the same creditors in subsequent assessment year, its stand proved on record that there were no justifications for the authorities below to make any addition against the assessee. Therefore Tribunal held that, mere low declaration of Income by creditors is no ground to make the addition in respect of unexplained cash credit in the hands of the Assessee.

M/s. Carissa Investment (P) Ltd. v. ACIT, ITA.No.6448/ Del./2016, dt.22/01/2021 (Del)(Trib.) Source: www.itat.nic.in

## 3. S. 74: Set-off of capital loss carried forward against capital gains earned is allowable.

The assessee filed its return of income for AY 2005-06 declaring Nil income under the normal provisions as well as book profit u/s. 115JB of the Act. It is a non-banking public financial company engaged in investment in shares, mutual funds, securities, debentures etc. During the Assessment, the AO was not allowed setting off the short term capital gain earned by it against long term capital loss brought forward from the AY 2001-02. The commissioner appeals also affirmed the view of the AO.

Before the Tribunal, the assessee pointed out that in the provisions for carry forward contained in s. 74 prior to the amendment by the Finance Act, 2002, there was no distinction between long term capital loss and short term capital loss and therefore, applying the provisions of s.74 as amended by the Finance Act, 2002. Therefore, the AO should have applied the provisions prior to the amendment as the losses brought forward related to the AY 2001-02.

The Tribunal following the decision of Bombay High Court in the case of Manali Investments (2013) 219 Taxman 113 (Bom)(HC) held that "short term capital gain" computed under section 50 on long term depreciable assets can be set off against long term capital loss u/s. 74.

M/s Apollo Finvest (India) Ltd. v. ACIT, ITA No.7489/ Mum/2018, dt.11/01/201 (Mum)(Trib.) Source : www.itat. pic in

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### **Indirect Taxes**

Tanmay Mody, GST Practitioner

## 1) GST – Simultaneous Proceedings under CGST & SGST laws

Whether the summons in the matter of inquiry issued under Section 70 of the SGST Act bars the Respondents to issue of summon under Section 70 of the CGST Act by virtue of Section 6(2)(b) of the CGST Act?

Held: The word "inquiry" in Section 70 has a special connotation and a specific purpose to summon any person to give evidence or to produce a document or any other thing. It cannot be intermixed with some statutory steps which may precede or may ensue upon the making of the inquiry or conclusion of inquiry. The process of inquiry under Section 70 is specific and unified by the very purpose for which provisions of Chapter XIV of the Act confers power upon the proper officer to hold inquiry. The word "inquiry" in Section 70 is not synonymous with the word "proceedings", in Section 6(2)(b) of the UPGST or CGST Act. The words "any proceeding" on the same "subject-matter" used in Section 6(2)(b) of the Act, means any proceeding on the same cause of action and for the same dispute involving some adjudication proceedings which may include assessment proceedings, proceedings for penalties etc., proceedings for demands and recovery under Section 73 and 74 etc. Section 6(2)(b) of the CGST Act prohibits a proper officer under the Act to initiate any proceeding on a subject-matter where on the same subject-matter proceeding by a proper officer under the UPGST Act has been initiated. There is no proceeding by a proper officer against the petitioner on the same subject-matter referable to Section 6(2)(b) of the UPGST Act, it is merely an inquiry by a proper officer under Section 70 of the CGST Act.

(Source: Order in Writ Petition No. 666 of 2020 by the Allahabad High Court in the case of M/s. G K Trading Co. vs. Union of India & Ors.)

# Gujarat AAR – GST on reimbursement of electricity

Whether electricity charges paid by landlord to electricity supply company for electricity connection in the name of landlord and recovered based on sub meters from different tenants be considered as amount recovered as pure agent of the tenant?

Held: The applicant has cast an onus on the lessee to pay the charges in respect of the electric power used by them directly to the electricity company. It cannot be said that the electricity charges would be covered by Sec. 15(2)(c) of the CGST Act, 2017 for the sole reason that the rate for renting of premises has been fixed at an amount and the electricity charges are to be borne by the lessee as per the actual usage of electric power by them in terms of the agreement. Accordingly,

the said amount would not be includible in the value of supply. The decision would apply to specific agreement wherein the clauses of the agreement are specific to the effect that the lessee would bear the electricity expenses at actuals and the value of renting of the immovable property is a fixed amount which becomes the value of supply in terms of the statutory provisions. The electricity charges collected by the landlord from the tenant at actuals based on the reading of the sub-meters is covered under the amount recovered as a pure agent in terms of the provisions of Rule 33 of the CGST Rules, 2017 in respect of the lessor.

(Source: Order No. GUJ/GAAR/R/93/2020 dt. 17th September, 2020 by the Gujarat AAR in the case of M/s. Gujarat Narmada Valley Fertilizers & Chemicals Ltd.)

## 3) West Bengal AAR – ITC on Works Contract Services

As per the applicant, section 17(5) of the CGST Act prohibits the recipient from claiming input tax credit on the *inward supplies* of the goods and services listed in the clauses whereas revenue argues that section 17(5) prohibits the recipient from claiming input tax credit if *his* (outward) supplies of the goods and services satisfy the conditions mentioned in any of the clauses thereunder. (emphasis supplied)

Held: The term 'supply' includes both 'inward' and 'outward' supplies. If a person makes a supply, it refers to an outward supply. If the taxable person claims or is prohibited from claiming the input tax credit in respect of a supply, it refers to an inward supply. Each of the clauses of section 17(5) of the CGST Act describes the supply of a class of goods or services. Clause (c) of section 17(5) of the CGST Act should be interpreted as a prohibition on a taxable person from claiming input tax credit on the inward supply of works contract service unless it is an input service for further supply of works contract service. The prohibition applies only if the works contract service is used for the construction of immovable property other than plant and machinery. The clause (d) of section 17(5) of the CGST Act extends the prohibition to cover other inputs and input services when the recipient is constructing the immovable property on his own account. The applicant is supplying works contract service to KMC, therefore, applicant is making an outward supply of works contract service and is not prohibited from claiming input tax credit either under clause (c) or clause (d) of section 17(5) of the CGST Act.

(Source: Order No. 15/WBAAR/2020-21 dt. 11th January, 2021 by the West Bengal AAR in the case of M/s. Sital Kumar Poddar)

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Southern	1	1572	21	5	1599				
Western	5	2689	37	6	2737				
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