FORM GST DRC - 01

OFFICE OF ADDITIONAL DIRECTOR JURISDICTION: MEERUT ZONAL UNIT, STATE/UT: KARNATAKA ADDRESS: -NA-

[See rule 100 (2) & 142(1)(a)]

No.: ZD070724064908V Case ID: AD070724013847V Date: 03/08/2024

To, 07AAMCM9016D1ZG LAGROWTH ASSOCIATES PRIVATE LIMITED G-242, Ghazipur Road, New Delhi, East Delhi, Delhi, 110096

Summary of Show Cause Notice

1.	Tax Period	From: OCT/2019 To: MAR/2023
2.	Financial Year (s)	2019-2020, 2020-2021, 2021-2022, 2022-2023
3.	Act	-NA-
4.	Section / Sub-section under which SCN is being issued	74
5.	SCN Reference No.	ZD070724064908V
6.	SCN Date	03/08/2024

(a) Brief facts of the Case: Clandestine supply of Goods and issuance of invoice to bogus firms

(b) Grounds:

SI.No.	Grounds	Description of grounds
1	74(7) Tax not paid or short paid	

	or erroneously refunded or input tax credit wrongly availed or utilised by reason of fraud or any willful- misstatement or suppression of facts	
2	122(1)(i): Makes supplies without invoice / issues incorrect or false invoice	
3	122(1)(ii): Issues invoice without supply in violation Act/Rules	

(c) Tax and other dues:

Financial Year: 2019-2020

					Тахр	eriod									
Sl.No.	HSN	Turnover	Rate of Tax	Fro	m	Тс)	Place of Supply (POS)	Act	Tax/Cess (₹)	Interest (₹)	Penalty (₹)	Fee (₹)	Others (₹)	Total (₹)
				Month	Year	Month	Year								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	7607	0		ост	2019	MAR	2020	09	IGST	6390636	0	0	0	0	6390636
2	7607	0		ост	2019	MAR	2020		CGST	184426078	0	0	0	0	184426078
3	7607	0		OCT	2019	MAR	2020		SGST	184426078	0	0	0	0	184426078

Financial Year: 2020-2021

					Тахр	eriod									
Sl.No.	HSN	Turnover	Rate of Tax	Fro	m	Тс)	Place of Supply (POS)	Act	Tax/Cess (₹)	Interest (₹)	Penalty (₹)	Fee (₹)	Others (₹)	Total (₹)
				Month	Year	Month	Year								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	7607	0		APR	2020	MAR	2021	09	IGST	445547708	0	0	0	0	445547708
2	7607	0		APR	2020	MAR	2021		CGST	289094584	0	0	0	0	289094584
3	7607	0		APR	2020	MAR	2021		SGST	289094584	0	0	0	0	289094584
				•											

Financial Year: 2021-2022

					Тахр	eriod									
Sl.No.	HSN	Turnover	Rate of Tax	Fro	m	Тс	0	Place of Supply (POS)	Act	Tax/Cess (₹)	Interest (₹)	Penalty (₹)	Fee (₹)	Others (₹)	Total (₹)
				Month	Year	Month	Year								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	7607	0		APR	2021	MAR	2022	09	IGST	276448776	0	0	0	0	276448776
2	7607	0		APR	2021	MAR	2022		CGST	516624785	0	0	0	0	516624785
3	7607	0		APR	2021	MAR	2022		SGST	516624785	0	0	0	0	516624785

Financial Year: 2022-2023

					Taxperiod										
Sl.No.	HSN	Turnover	Rate of Tax	Fro	m	To	0	Place of Supply (POS)	Act	Tax/Cess (₹)	Interest (₹)	Penalty (₹)	Fee (₹)	Others (₹)	Total (₹)
				Month	Year	Month	Year								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	7607	0		APR	2022	MAR	2023		CGST	84132929	0	0	0	0	84132929
2	7607	0		APR	2022	MAR	2023		SGST	84132929	0	0	0	0	84132929

Total Amount (For all Financial Years)

Tax Period	Act	Tax/Cess	Interest	Penalty	Cess	Fees	Others	Total
2019-20	CGST	184426078	0	0	0	0	0	184426078
2019-20	IGST	6390636	0	0	0	0	0	6390636
2019-20	SGST	184426078	0	0	0	0	0	184426078
2019-20	CESS	0	0	0	0	0	0	0
2020-21	CGST	289094584	0	0	0	0	0	289094584
2020-21	IGST	445547708	0	0	0	0	0	445547708
2020-21	SGST	289094584	0	0	0	0	0	289094584
2020-21	CESS	0	0	0	0	0	0	0
2021-22	CGST	516624785	0	0	0	0	0	516624785
2021-22	IGST	276448776	0	0	0	0	0	276448776
2021-22	SGST	516624785	0	0	0	0	0	516624785
2021-22	CESS	0	0	0	0	0	0	0
2022-23	CGST	84132929	0	0	0	0	0	84132929
2022-23	IGST	0	0	0	0	0	0	0
2022-23	SGST	84132929	0	0	0	0	0	84132929
2022-23	CESS	0	0	0	0	0	0	0
Total (Act wise)	CGST	1074278376	0	0	0	0	0	1074278376
	IGST	728387120	0	0	0	0	0	728387120
	SGST	1074278376	0	0	0	0	0	1074278376
	CESS	0	0	0	0	0	0	0

Total 2876943872	0	0 0	0	0	2876943872
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Copy of Detailed Notice is enclosed as separate attachment.

Signature

Name: MINU SHUKLA PATHAK Designation: Additional Director Jurisdiction: MEERUT ZONAL UNIT, Karnataka Address: -NA-

Enclouser/s:

• DSCN MEPL & Others

वस्तु एंव सेवा कर आसूचना महानिदेशालय, गाजियाबाद क्षेत्रीय इकाई चतुर्थ एंव पंचम तल, एरो कॉर्पोरेट टॉवर, प्लाट न०-६, सेक्टर-१४, कौशाम्बी, गाजियाबाद-२०१०१२ दूरभाष:०१२०-२७७७८६०, २७७७८६१, २७७७८६२



DIRECTORATE GENERAL OF GOODS AND SERVICES TAX INTELLIGENCE, GHAZIABAD REGIONAL UNIT 4th & 5th Floor, Arrow Corporate Tower, Plot No. 6, Sector-14, Kaushambi, Ghaziabad-201012 Telephone: 0120-2777860 2777861, 2777862

Form GST DRC - 01

[See rule 142(1)]

Reference No. DGGI/INV/GST/1757/2021/GRU/3822(S/L)

Date:30.07.2024

CBIC-DIN-202407DNN400000C82F

SCN No.72/2024-25

Tax Period	Act/Rules	Section/Sub-section under which SCN is being issued
July 2017 to August 2022	SGSTAct, 2017, &	Section 74 & Section 122 of CGST Act, 2017, Section 74 & Section 122 of SGST Act, 2017, and Section 20 of IGST Act, 2017.

To,

01		01	
Sl.	Name, GSTIN/PAN/AADHAR &	Sl.	Name, GSTIN/PAN/ AADHAR &
No.	Address of the Noticee	No.	Address of the Noticee
	M/s Montage Enterprises Pvt. Ltd.,		M/s Montage Enterprises Pvt. Ltd.,
	(01AACCM8173H1ZM),		(05AACCM8173H1ZE),
1	Phase-1, Lane No.4, SIDCO Industrial	2	Plot No.13, Sector-11, IIE SIDCUL,
	Area, Bari Brahmana, Samba, Jammu		SIDCUL, Haridwar, Uttarakhand,
	and Kashmir, 181133.		249403.
	M/s Montage Enterprises Pvt. Ltd.,		M/s Montage Enterprises Pvt. Ltd.,
3	(09AACCM8173H1Z6),	4	(23AACCM8173H1ZG),
3	C-20-22, Sector-57, Noida, Gautam	4	29A, Industrial Area, Malanpur, Bhind,
	Buddha Nagar, U.P., 201301.		Madhya Pradesh, 477117.
			M/s Neemsar Vyappar Pvt. Ltd.,
			(09AAMCM9015A1ZJ), (Formerly
	M/s Lagrowth Associates Pvt. Ltd.,		known as M/s Montage Flexipack Sales
	(07AAMCM9016D1ZG), (Formerly		Pvt. Ltd.), Village-Gahru Pargana-
5	known as M/s Montage Sales Pvt. Ltd.),	6	Bijnore, Warehouse No.3, Back Portion,
	Ground Floor, G-242, Ghazipur Road,		Khasra No. 1441, Old No. 1664/1,
	Delhi, 110096		Daroga Khera, Opp. Bal Bhawan,
			Lucknow-Kanpur Road, NH-25,
			Lucknow, 226012.
	M/s Pitambara Business Promotions Pvt.		Mr. Arvind Gupta, Promoter Director of
	Ltd., (23AAMCM9078M1ZP), (Formerly		M/s Montage Enterprises Pvt. Ltd.,
7	known as M/s Montage Printpack Sales	8	PAN ABUPG1128L
	Pvt. Ltd.), Ground Floor, A-15, Kailash		C-17, Sector-Chi-IV, Greater Noida,
	Nagar, City Center Square, Near Boys		U.P., 201308.



	Hastel Cruzlian Madhua Dradach	1	
	Hostel, Gwalior, Madhya Pradesh,		
	474002.		
9	Mr. Yogeshwar Singh, Director of M/s Montage Enterprises Pvt. Ltd., AADHAR No. 9606 7424 7183 A-3/415, Block No.10, Kailash Dham Apartment, Sector-50, Noida, 201301.	10	Mr. Harvinder Singh Matharu, Director of M/s Montage Sales Pvt. Ltd., AADHAR No. 7661 5104 8705 B-95, Sectpr-72, Noida, 201301.
11	Mr. Jasmeet Singh, Director of M/s Montage Sales Pvt. Ltd., AADHAR No. 4837 7285 4832 A-2/602, Krishna Apra Garden, Vaibhav Khand, Indirapuram, Ghaziabad, 201014.	12	Mr. Nikhil Agnihotri, Director of M/s Montage Flexipack Sales Pvt. Ltd., AADHAR No. 3784 9608 1925 A-402, Rudra Twin Tower, New Berry Road, Butler Colony, Lucknow, U.P.
13	Mr. Sandeep Jain, Director of M/s Montage Flexipack Sales Pvt. Ltd., AADHAR No. 4918 0182 9596 Flat No5, 2 nd Floor, Priya Apartment, 7/22 Tilak Nagar, Kanpur Nagar, 208002.	14	Mr. Gagandip Singh Bawa, Director of M/s Montage Printpack Sales Pvt. Ltd., AADHAR No. 6935 6824 1582 N-30, Jang Pura Extension, Jang Pura, Delhi, 110014.
15	Mr. Sushil Singh, Director of M/s Montage Printpack Sales Pvt. Ltd., AADHAR No. 3228 8957 8206 DH-2 Balaji Enclave Behind Sita Manor Hotel Thatipur, Gwalior, M.P., 474002.	16	M/s Globe Enterprises (01BIKPC6617E1ZS) Kartholi, Dasal, Bari Brahmana, Samba, Jammu and Kasmir, 181133.
17	M/s Elfed Industries (07AAIFE1973E1ZI) Office No. 102, 1 st Floor, Plot No. E-22, Jawahar Park, Laxmi Nagar, Delhi, 110092.	18	M/s Jai Bhawani Traders (06BWYPV1916P1ZE) H. No. 875, Navdeep Colony, Near CR College, Azad Nagar, Hisar, Haryana, 125001.
19	M/s Life Wellness (07AAIFL7295E1Z0) Plot No. 131, Ground Floor, Pkt-H, Sector-1, Bawana, DSIDC City, Bawana, Delhi, 110039.	20	M/s Ganpati Enterprises (06IQSPS7194P1ZA) H. No. FCA 74, Nawlu Colony, Ballabhgarh, Faridabad, Haryana 121004.
21	M/s Mantova Enterprises Pvt. Ltd. (07AALCM8399L1ZG) UG-17, Tower No. 4, Vishwa Deep, District Centre, Janak Puri, Delhi- 110058.	22	M/s Urban Trade Industries (07AAGFU2991L1ZL) Office No.403, 4 th Floor, Metro Complex, Building No. 4/5, Near Veer Saverkar Market, Nirman Vihar, Delhi, 110092.
23	M/s Arranger Tradelinks (India) Pvt. Ltd. (07AAMCA0840R1Z9) 404, 4th Floor, Madhuban Building, Nehru Place, Delhi, 110019.	24	M/s Shri Mahaveer Ji Sales Corporation (07AAEPK3770F2ZT) Khasra No. 12/26, Bijapur, Village Budhpur Bijapur, Delhi, 110082.
25	M/s Avi Foil Traders (07AAOPG0924D1Z2) H. No. 474, Ground Floor, Kh No.	26	M/s BPSR Industries Pvt. Ltd. (07AAHCB5448H1ZK) Shop No11, Plot No2, Pocket-6 Malik



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	105/78, Village and Post Khera Kalan,		Buldicon Plaza, Sector-12, Dwarka,
	Near Shiv Mandir, Delhi, 110082.		Delhi, 110078.
	M/s Global Trading Co		M/s Swastik Enterprises
27	(07AATFG8021G1Z8)	28	(07AAUPQ6586B3Z2)
2/	Shop In, H. No-150, Badami Business	20	H. No4, 3rd, Ph-I, Community Centre,
	Centre, Kilokari, Delhi, 110014.		Naraina Industrial Area, Delhi, 110028.
	M/s Catania Enterprises Pvt. Ltd.		M/s Gwalior Enterprises Pvt. Ltd.
	(07AAHCC6179Q1ZU)		(07AAHCG0818Q2Z7)
29	A-10/5, Ground Floor, Jhilmil Industrial	30	Space No216, Plot No19, Radha
	Area, Near Tata Motors, Shahdara,		Chamber, G-Block Community Centre,
	Delhi-110095.		Vikas Puri, Delhi-110018.
	M/s Radical Corporation		M/s Ghaziabad Enterprises Pvt. Ltd.
	(07ABAFR7758R1Z9)		(07AHCG0827H1ZQ)
31	Office No, 403, 4 th Floor, Building No.	32	302, 3 rd Floor, Pankaj Tower,
31	4/5, Veer Saverkar Market, Nirman	32	Commercial Centre, Vikas Puri,
	Vihar, Delhi, 110092.		Delhi, 110018.
	M/s Surya Enterprises		M/s Proview Traders
	(07ACTPI0807Q1Z2)		(07ADGPT2590M2ZX)
33	Off. No. TC/607, Near Pacific Mall,	34	27/4, Ground Floor, Plot No27, Main
	C.H.S Road, Transit Camp, Raghubir		G.T Road, Dilshad Garden Industrial
	Nagar, Delhi, 110027.		Area, Delhi, 110095.
	M/s P B Associates		M/s S.G. Enterprises
0.5	(07ADNPB7822K1ZC)	06	(07AEAFS4741N1ZP)
35	1/6485, East Rohtash Nagar, Shahdara,	36	Shop No. 4, Kh No59, Saket, South
	Delhi, 110032.		Delhi, Delhi, 110030.
	M/s Mehul Enterprises		M/s S. V. Enterprises
	(07ANUPH4951N1Z8)		(07ANYPR8387E1ZZ)
37	H.No255, JJ Colony, Madanpur	38	62, 2 nd Floor, Pocket-11, Sector-24,
	Khadar, Delhi, 110076.		Rohini, Delhi, 110085.
			M/s Aavesh Enterprises
	M/s Mahalaxmi Enterprises		(07AHKPH3924R1ZS)
	(07AFUPJ0552P1ZU)		Off. No 123/A, Near Singh General
39	Plot No. J-108, Mohan Garden, Uttam	40	Store, Ravi Nagar Road, DDA Colony,
	Nagar, Near R.P. Property, New Delhi,		
	110059.		Chaukhandi, Vishnu Garden, Delhi,
			110018.
	M/s Jajoria Enterprise		M/s Gravity Enterprises
	(07AOKPK9451R2ZZ)		(07AILPC7741F1ZB)
41	H. No. 16/569-I, Gali No. 18, Arya Samaj	42	1347/B-1, Upper Ground Floor, Gali
	Road, Bapa Nagar, Karol Bagh, Delhi,		No. 13, Govindpuri, Kalkaji, Delhi,
	110005.		110019.
	M/s Kumar Enterprises		M/s Blue Star
40	(07AOCPK8764K1ZG)		(07AKLPJ5035D1ZD)
43	G-182, 2 nd Floor, Sector-2, Bawana,	44	F-24, Vardhman Select Mall, Block-I,
	Delhi, 110039.		Narela Industrial Area, Delhi, 110040.
	M/s Genius Enterprises		M/s Aggarwal Traders
	(07APVPC5712R1Z7)		(07ALGPU1224R2ZK)
45	D-323A, Balaji Complex, Gali No11,	46	Plot No. 14/12, Nala Road, MCD Office,
	Laxmi Nagar, Delhi, 110092.		Okhla Industrial Area, Delhi, 110020.
L	Lamin 110501, Donn, 110092.		onina maaoman maa, Donni, 110020.



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	M/s Arya Trading		M/s S S Traders (07ALMPU0109M1ZR)
47	(07AQOPH9721P1Z2)	48	Shop No 1, Plot No 13, Tilak Enclave
4/	Shop No. 33, Andrews Ganj, Delhi,	40	Part-2, Mohan Garden, Uttam Nagar
	110049.		Play Factory, Delhi, 110059.
	M/s Sanjay Trading Co		M/s Nirbhay Trading Co.
	(07ASCPL1721F1Z7)		(07AMRPJ1732H1ZZ)
49	H.No117, Ground Floor, Block-C, Gali	50	H. No413/4, Ground Floor, Gazipur
	No-2, Nangali Vihar Extn, Najafgarh,		Near School Lane, Gazipur, Delhi,
	Delhi, 110043.		110092.
	M/s Neelima Enterprises		M/s Yadav Enterprises
	(07ASCPN4947P1Z2)		(07ANCPY3290M1ZD)
51	B-158, Sadatpur, ST No. 2, Karawal	52	
	-		H. No. 183, 1st Floor, Naraina, Opposite
	Nagar, Shahdara, Delhi, 110094.		PNB Bank, Delhi, 110028.
	M/s P.R. Traders		M/s Image India (07AUOPK8454G1Z6)
53	(07ASQPR5114G1ZI)	54	A-23, Prem Nagar-II, Kirari Suleman
	Kh No. 125, Hamidpur, Delhi, 110036.		Nagar, Delhi, 110086.
	M/s Galaxy Impex		M/s M.R. Enterprises
	(07ATWPM4771H1Z0)		(07AWUPA7355A2ZJ)
55		56	Plot No 5-1/133, C-Block, Kh-40/23,
	A-45, Block-A, Wazirpur Industrial		Gali No. 5, Bir Bazar Road, Baprola
	Area, Wazirpur, Delhi, 110052.		Vihar, Nangloi, Delhi, 110043.
	M/s Sunil S Traders		M/s Gupta Enterprises
	(07AUKPD2924N1ZF)	58	(07AXHPK0562F1ZO)
57	136-B, Near Shiv Shakti Mandir, Janta		B-7, Ground Floor, Dharam Colony
0/	Flat, National Market School Road, Ekta		Taneja Complex, Khasra No 33/20,
	Enclave, Peera Garhi, Delhi, 110041.		21/1, Nangloi, Delhi, 110041.
	M/s Renu Enterprises		M/s Ridhi Traders
	(07BDPPD1016E1Z2)		(07BDSPK7832A1ZG)
50	W-137, Ground Floor, Naraina	60	Plot No. 221, Kh No. 57/6/2, Ground
59	Industrial Area, Naraina Phase-1, Delhi,	00	Floor, Gram Sabha Lal Dora Village,
	110028.		_
			Prahaladpur Bangar, Delhi, 110042.
	M/s Sky International		M/s Tyagi Traders
61	(07AXUPV6358F1ZM)	62	(07AYCPT3547R2ZL)
	Shop No4, Kh No59, Saket, Delhi,		H. No. SRS-173, 1 st Floor, Naraina,
	110030.		Delhi, 110028.
	M/s Ragni Enterprises		M/s ST Traders
63	(07BDSPK7832A2ZF)	64	(07AYQPT5265L2ZG)
00	B-72, Yadav Park, Nangloi, Delhi,	+	H.No19, Block-A, Phase-I, Naraina
	110041.		Industrial Area, Delhi, 110028.
	M/s Kapur Enterprises		M/s Nafeesh Trading Co.
6-	(07BETPY0156F2Z1)	60	(07AZCPN6735E1ZD)
65	Kh. No. 15/14, 1 st Floor, MCD Office,	66	H. No150, Badami Business Centre,
	Qutub Road, Delhi, 110055.		Kilokari, Delhi, 110014.
	M/s Unique Traders		M/s Das Enterprises
	(07BFHPP9940K1ZS)		(07AZVPR2782C1ZV)
67	Plot No2, Kh. No. 42/2-P No290,	68	H. No. SRS-73, 1 st Floor, National
	Village Nangloi, Delhi-110041.		Market, Naraina, Delhi, 110028.
60	M/s Esprit Enterprises	70	M/s Vishal Enterprises
69	My s Espin Enterprises	70	wi/s visitat Litter prises



	(07BFHPP9940K2ZR)		(07BBVPH7773J1ZT)
	Plot No171/1, Ground Floor, Block-WZ,		3, D-280, Saket Place, Delhi, 110017.
			3, D-200, Saket Flace, Dellii, 11001/.
	Shakurpur, Delhi, 110034.		
	M/s Acrosys Tech		M/s Virgo Enterprises
71	(07BFKPG9015D1ZN)	72	(07BGRPS1887H2ZL)
,	G-82, Sector-2, Bawana Industrial Area,		H. No. 10, Ground Floor, Extn-2-C,
	Bawana, Delhi, 110039.		Nangloi, Delhi, 110041.
	M/s Mayo Enterprises		M/s Sun Trading Company
	(07BGRPS1887H1ZM)		(07BDIPJ1111P1ZK)
73	Shop at Plot No48, Ground Floor, Near	74	111 Old 7L New No 48, Ground Floor,
/3	Radha Krishan Dharam Kata,	77	Kh No 22/13 Surat Singh Enclave,
	Gurudwara Road Gali No13 Siraspur,		Block Y, Adarsh Enclave Prem Nagar,
	Delhi-110042.		New Delhi-110041.
	M/s Ajay Trading Co		M/s P.C. Supplier Co.
	(07BDNPS7160Q1ZJ)		(07BJRPN7668C1ZN)
75	Plot 17/42 And 17/43, Ground Floor,	76	Unit-206, Second Floor, Plot No-3,
	Block-D, JJ Colony, Shahabad Dairy D	Dwarka Sec-12, Pocket-6, New Delhi,	
	Near Roop Krishna, Delhi, 110042.		110075.
	M/s Azad Trading		M/s Winjet Industries
	(07BIWPR8811F1ZN)		(07BJVPK8809G1ZL)
77	988A, Shop No. 1, Sir Chhotu Ram	78	H. No96, Ground Floor, Gali No05,
	Marg, Raj Nagar, II, Palam Colony,		Block, E-5, Near Metro Shastri Nagar,
	Delhi, 110077.		Shastri Nagar, Delhi, 110052.
	M/s Hari Sales Corporation		M/s D K Trading Company
	(07BJOPH4621J1Z2)		(07BLFPJ4916H1Z4)
79	97840/23, MCD Office, Shakarpur,	80	G/F, New 96 Kh No 21/13/2, Laxmi
	Delhi, 110028.		Vihar, Prem Nagar Ph 3, Delhi, 110086.
	M/s Raghav Traders		M/s Mahalaxmi Fabrics
	(07BRDPR1489K1Z9)		(07BULPK5077P1ZS)
81	H.No. 183, 1 st Floor, Naraina, Delhi,	82	18, East Azad Nagar, Delhi, 110051.
	110028.		10, Euser Euler Huger, Denni, 110031.
	M/s Singhania Enterprises		M/s Tiwari Trading Company
	(07BSTPS8497K2ZB)		(07BLZPT9351G1Z5)
83	C-2/39, New Kondli, Mayur Vihar	84	Out of Kh. No. 12/26, Village, Budhpur,
	Phase-III, Delhi, 110096.		Bijapur, Delhi, 110036.
	M/s Subrat Trading Company		M/s Ganpati Enterprises
	(07BLVPP6162R1ZV)		(07BMVPB3838H1ZR)
85	Plot No. 489, Ground Floor, Shahbad,	86	B-1174, Ground Floor, Gharoli, Mayur
			Vihar Phase III, Delhi, 110096.
	Daulatpur, Delhi, 110042. M/s Barfani Traders		M/s Rai Enterprises
			-
0-	(07BTTPK2984C1ZB)	00	(07BNJPR5077B1ZU)
87	Flat No. 70, 1 st Floor, Near Laxmi	88	G/F, Taneja Complex, Pvt NoB-7, B-8,
	Narayan Mandir, Guru Hari Kishan		Kh No33/20, 21/1, Taneja Complex,
	Nagar, Paschim Vihar, Delhi, 110041.		Dharam Colony, Nangloi, Delhi, 110041
	M/s Pal Trading Co.		M/s R.N Trading Co
89	(07BUXPP4783K1ZI)	90	(07BPNPN0572H1ZO)
-			
	LG8 D-211/104, Munirka, New Delhi-		H.No10, Harphool Vihar, Baprola,
91	LG8 D-211/104, Munirka, New Delhi- 110021. M/s Rajesh Packaging Materials	92	H.No10, Harphool Vihar, Baprola, Nangloi, Delhi, 110041. M/s Vikas Trading Company



	$(a = \text{PUVDP}_{210} + 170)$	1	(a=PNOPCa(aaP17II)
	(07BUXPR3104A1ZO)		(07BNOPG2623R1ZH)
	988A, Shop No. 2, Sir Chhotu Ram		21/10, 11/1, 11/3, 12/1, 12/3, C-132, Gali
	Marg, Raj Nagar, II, Palam Colony,		No. 6, Main Road, Harit Vihar, Burari,
	Delhi, 110077.		Delhi, 110084.
	M/s Choudhari Traders		M/s Maruti Trading Company
	(07BVSPC0480N1Z6)		(07BYUPA7776E1ZY)
93	Off. No.36/A, Near Sunil Medicos,	94	H. No. RZ-77, First Floor, Maruti
	Najafgarh Dhansa Road, K, Block, Gopal		Trading Company, Uttam Nagar, Delhi,
	Nagar, Najafgarh, Delhi, 110043.		110059.
	M/s Aripha Trading Co.		M/s Om Trading Company
	(07BXAPA6529A1Z3)		(07BRCPJ0056P1ZN)
95	H. No. 128, Ground Floor, B/1, Shop	96	A-35, Ground Floor, Jhilmil Industrial
	No.4, Kilokari, Delhi-110014.		Area, Jhilmil, Delhi, 110095.
	M/s Pitambar Packaging		M/s Swastik Enterprises
	(07BXQPN0974E1Z5)		(07BZNPJ1724R1ZR)
97	Shop in Plot No.13/3, Ground Floor,	98	A-45, Block-A, Wazirpur Industrial
			_
	Back Side, Kapashera, Delhi, 110037.		Area, Wazirpur, Delhi, 110052.
	M/s Pramod Traders		M/s Alston Traders
	(07BYLPB0493C1ZQ)		(07CAUPR4187F1Z0)
99		Front Portion G/F, Kh. No. 122, Savita	
	Block-C, Village Siraspur, Raja Vihar,		Vihar Radha Vihar Ph-2, Gali No2,
	Delhi, 110042.		Mukandpur, Delhi, 110084.
	M/s Adheera Traders		M/s Unique Traders
	(07BYPPB4545K1Z4)	102	(07BYXPK7566D2ZQ)
101	Plot No.23-G, Ground Floor, Shop No.		A-228, Landmark Na Shaheed Sukhdev
	10/1, Dharam Colony, Nangloi, Delhi,		Nagar, Wazirpur Industrial Area, Delhi,
	110041.		110052.
	M/s Niraj Enterprises		M/s Tradezone Enterprises
	(07CGLPN7896N3Z4)		(07CBGPT7205K1ZA)
103	ZC/281, Near MCD Office, Naraina,	104	A-55-56, L/G/F, Madhu Vihar Market
	Delhi, 110028.		Main Road, Delhi, 110092.
	M/s Durga Enterprises		M/s Sameer Trading Company
	(07CICPC2115G1ZY)		(07CBHPR7202R1Z0)
105	C-209, Ramadhar, Naraina Industrial	106	H. No. B-278-A, Ground Floor Shop,
	Area Phase-1, Naraina, Delhi, 110028.		Tigri Extension, New Delhi, 110019.
	M/s Harish Traders		
			M/s A M Enterprises
10-	(07CINPP9472Q1ZZ)	100	(07DFRPM5804P1ZM)
107	Unit-No. 305, 3 rd Floor, Plot No. 4,	108	H. No. 1954, Ground Floor, Near
	Sector-G, Mamrams Premium Tower,		Mohan Das, Narela Village Pana
	Kondli Gharoli, Delhi, 110096.		Mamaupur, Delhi, 110040.
	M/s H K Enterprises		M/s Shayam Impex
109	(07CDCPK2241L2ZM)	110	(07CEXPV6488L1Z0)
109	A-188, Naraina Industrial Area, Phase-I,		1824/2, Main Rajouri Garden, Delhi,
	Delhi, 110028.		110027.
	M/s Maurya Enterprises		M/s Jai Bhawani Traders
	(07CLBPM0865R2ZI)	112	(07CFAPT7827M1ZS)
111	Unit No305, 3 rd Floor, Plot No. 4,		A-563, Naraina Industrial Area, Delhi,
	Sector-G, Kondili Garoli, Delhi, 110096.		110028.
113	M/s Satyanarayan Traders	114	M/s Mehul Enterprises
-	Directorate General of Goods and Services Tax Intelligence,	-	-

	(a = OI MDDaaaa O(7a))	1	(2 - 00 IDD = 0 D = 7 M)
	(07CLMPP0929C1Z3)		(07CGJPD1778B1ZM)
	RZF, 954-C, Raj Nagar, Part-II, Palam		70/60, Ground Floor, Near Ice Factory,
	Colony, Delhi, 110077.		Mangolpur Kalan, Delhi, 110085.
	M/s Gokul Enterprises		M/s Vicky Trading Co
	(07COQPP0478H1ZF)		(07CJUPM2255G1ZV)
115	H-83, Vijay Vihar, Phase-II, Rohini,	116	26-D, Ground Floor, Block-D, Pvt. Shop
	Delhi, 110085.		No.8, Pandav Nagar, Delhi, 110092.
			M/s Gupta Traders
	M/s Ganapati Enterprises		(07DFZPG1472M1ZQ)
	(07CUMPP6915P1ZO)	110	
117	C-34, Ground Floor, Kh. No. 12/13,	118	Off No. 129-B, Near Roshan Garden,
	Aman Puri, Nangloi, Delhi, 110041.		Shivaji Road, Masudabad Najafgarh,
			Delhi, 110043.
	M/s Ram Enterprises		M/s Mahaveer Industries
119	(07DBFPK8046H1ZH)	120	(07DHRPR6682G1ZI)
119	C-2/39, Ground Floor, New Kondli,	120	
	Mayur Vihar Phase-3, Delhi, 110096.		AG 88-D, Vikashpuri, Delhi, 110018.
	M/s Gyan Traders	1	M/s Sitakant Trading Co.
	(07DBLPK9034D2ZK)		(07DIOPP3069P1ZA)
121	302, Pankaj Tower, Vikas Puri,	122	A-61, Jain Park, Gali No5, Uttam
	Delhi, 110018.		Nagar, Delhi, 110059.
	M/s Kavita Industries		M/s Gita Enterprises
	(07DDTPK9495L2ZA)		(07DLXPG8767F1ZA)
100		104	
123	MB-42/2, 2 nd Floor, Plot No. 12, Master	124	H. No. SRS/73, 1 st Floor, National
	Block, Gali No. 2, Shakarpur, Delhi,		Market, Naraina Opp. PNB Bank, Delhi,
	110092.		110028.
	M/s Jagdamba Enterprises		M/s Gupta Enterprises
	(07DVRPK7541H1Z2)		(07DOOPA4777P2Z3)
125	265, Ground Floor, Pratap Khand,	126	148/151, Ground Floor, Ram Nagar,
	Vishwakarma Nagar, Jhilmil Colony,		
	Delhi, 110095.		Qutub Road, Delhi, 110055.
	M/s Singh Enterprises		M/s Gupta Enterprises
	(07DXHPS1755R1ZJ)		(07DOOPG0973R1Z4)
127	H.No126, Block-C, Ph-I, Naraina	128	F-29590/2, Ground Floor, Balbir
	Industrial Area, Delhi, 110028.		Nagar, Delhi, 110028.
	M/s MK Enterprises		M/s Kumar Enterprises
	(07EATPK4367M1ZT)		(07EFEPK0237Q1Z5)
129		130	
	B-135, Mohan Garden, Hastal Road,		Shop. No. One, Ground Floor, Rani
<u> </u>	Uttam Nagar, Delhi, 110059.		Garden, Shastri Nagar, Delhi, 110031.
	M/s Subham Warpers		M/s Kumar Enterprises
	(07DOPPR4508E1ZO)		(07DRBPK8521B2Z3)
131	Plot No. 92, Front Side, 1 st Floor,	132	H.No. 4, 3 rd Floor, Ph-I, Community
	Shamshan Ghat Road, Bijwasan, Delhi,		Centre, Naraina Industrial Area, Delhi,
	110061.		110028.
	M/s Rajkishore Trading		M/s Golf Traders
	(07EFTPR2472K1ZM)		(07DRXPK8539K1ZP)
133	Shop No. 5, VPO Shahbad, Daulatpur,	134	Shop No. 33, Andrews Ganj, Delhi,
	Delhi, 110042.		110049.
135	M/s Sharma Enterprises	136	M/s Universal Traders
		1 1 3 0	



	(07EFZPS6397G1Z8)		(07DSUPA3132C1Z2)
	3 rd 08 Floor, 341 A/95, Gali, No, 13,		Khasra No 761, Ground Floor,
	Shalimar Park Extension, Bholanath		Landmark Khreah Road, Near
	Nagar, Shahdara, Delhi, 110032.		Hanuman Mandir, Village Siraspur,
	Nagar, Shandara, Delin, 110032.		Delhi, 110042.
	M/z Due lle en Tres line Ce		
	M/s Pradhan Trading Co		M/s Shiv Shakti Enterprises
	(07EHSPP9216E1ZU)		(07EUIPP4391D1ZD)
137	Shop No.3, Ground Floor, Shri	138	Plot No. 223 Kh. No. 958, Ground
	Parasnath Jain Complex, 10/1 and 10/2,		Floor, Landmark Near Shiv Mandir,
	Khasra No. 33/19, Dharam Colony,		Block-C Raja Vihar, Village Siraspur,
	Nangloi, Delhi, 110041.		Delhi, 110042.
	M/s BSA Industries		M/s Starnx Enterprises
	(07EKFPS8144Q1Z7)		(07EYTPR0862L1ZJ)
139	188, GF City Paper Fie, Industrial Area,	140	X/437, 1 st Floor, Mohalla Ram Nagar,
	Patparpar Ganj, Near Showroom Honda,		Gali 0, Mohalla Ram Nagar, Delhi,
	Delhi, 110092.		110031.
	M/s JK Trading Co.		M/s Soham Marketing
	(07EUXPK1745P1ZM)	1	(07EWAPS6954P3ZI)
141	P-14, Ground Floor, Vijay Vihar, Uttam	142	H. No126, Block, C, Naraina Ph-1,
	Nagar, Delhi, 110059.		Naraina, Delhi, 110028.
	M/s Rajasthan Udyog		M/s Concept
	(07EULPS3748N1ZN)		(07EXWPS6748Q1ZU)
143	Ground Floor, H.No404 New 140,	144	Khasra No. 13/6/1, Gali No.5, Opp
- 10	Street No 15, Village Jagatpur, Near	-77	Radha Krishna Mandir, Village Jagat
	Kartar Vatika, Delhi, 110084.		Pur Delhi, Delhi, 110084.
	M/s Pandit Traders		M/s Jyoti Traders
	(07FRMPR1240D1ZU)	146	(07EWAPS6954P1ZK)
145	E-368, Naraina Industrial Area, Delhi,		A-175, Naraina Industrial Area, Phase-
	110028.		1, Naraina, Delhi, 110028.
	M/s Iconic International		M/s Mau Traders
	(07FUHPS8719A2ZB)		(07EZRPM5505G1Z1)
147	1425/X, Janta Gali, Gandhi Nagar,	148	1402 G1, Gali No.13, Govind Puri,
	Delhi, 110031.		Delhi, 110019.
	M/s Shine International		M/s A S Sales
149	(07FUMPM7409E1ZC)	150	(07FERPS7038C1Z1)
	180 E-2, Street No. 0, Bhola Nath Nagar,		Kh No188, Ground Floor, Khatoni No-
	Shahdara, Delhi, 110032.		26, Dallu Pura, Delhi, 110096.
	M/s Ashoka Industry		M/s Surya Enterprises
151	(07FUWPS2084H1ZT)	152	(07FEZPS1061B1Z8)
	Plot No. 22, Pole No. 44, Sita Puri Dabri		D 7/3, F-Block, Pocket X, Okhla Phase
	Palam, Delhi, 110045.		II, Okhla Industrial Area, Delhi, 110020
	M/s Vishnu Traders		M/s Shree Jee Traders
153	(07FXVPM4565H1ZO)	154	(07FFZPS9040K3ZA)
-00	B-83, New-165, Rd No. 7, Andrews Ganj,	-04	Shop at 121, Beena Enclave, Nangloi,
	Delhi, 110049.		Delhi, 110041.
	M/s S.S. Trading Co.		M/s KC Laminates
1	(07GLDPS5476Q1Z0)	156	(07FIFPK1036L1Z7)
155	H.No2, Ambedkar Palace, A-1 Baprolla	156	E-1/407, Shivram Park, Nangloi, Delhi,
	Vihar, Nangloi, Delhi, 110041.		110041.
1	Directorate Ceneral of Coods and Services Tax Intelligence		Zonal I mit Page 8 of 230



	M/- ID Fut-mains	1	M/- M-h - J D-+
	M/s J P Enterprises		M/s Mahadev Enterprises
157	(07GPTPP4897E1ZX)	158	(07FIQPK9390J1ZB)
1.57	230/5-B, Ground Floor, Railway Colony,	1.00	C-11, Block-C, Loni Road, Jyoti Nagar,
	Mandawali Fazalpur, Delhi, 110092.		Shahdara, Delhi, 110094.
	M/s Lalit Enterprises		M/s Seaborne Creations
	(07GWEPK9683R1ZA)		(07HINPK9189N1ZZ)
159	H. No. 265, Pocket-12, Vijay Vihar,	160	30/62, Main 100 Foot Road, Gali No. 8,
	Bhagwan Vishwakarma Marg, Park,		Vishwas Nagar, Shahdara, Delhi,
	Sector 5, Rohini, Delhi, 110085.		110032.
	M/s Singh International		M/s Prasad Enterprises
	, .		
161	(07HDEPD4213G1ZY)	162	(07HJJPS0550Q1ZG)
	34038/235, Shiv Market, Janakpuri,		H. No.8-A, Chanchal Park, Gurdayal
	Delhi, 110028.		Vihar, Nangloi, Delhi, 110041.
	M/s Krishna Traders		M/s Shiv International
	(07HDSPK6418J1ZV)		(07HJCPD2205L1ZG)
163	Shop No. G-3, Plot No. 4, Gupta Arcade	164	B-310, 3 rd Floor, Rectangle One D3,
	LSC, Shrestha Vihar Near Dav Public		PVR Select City Walk, Saket, Delhi,
	School, Delhi, 110092.		110017.
	M/s Kailash Enterprises		M/s Shree Shyam Trading Company
	(07HGSPK6058R1Z5)		(07HKJPS1195G1ZO)
165	H. No 76, Shop No1, Abchal Nagar,	166	H. No. 5, Gali No. 1, Ground Floor,
105	Nilothi Chander Vihar, Nangloi, Delhi,	100	Khasra No. 235, Mukandpur Extn.,
			_
	110041.		Delhi, 110042.
	M/s Empire Traders	168	M/s Vikas Traders
	(07IWOPS8094E1ZM)		(07JECPK2475G1ZD)
167	H.No168, Ground Floor, Plot No3,		Off No. 11, Near GST Support Center,
	Kh. No. 37/16, Saboli Road Sanjay		Sarakpur Road, Prem Nagar, Delhi,
	Colony, Narela, Delhi, 110040.		110043.
	M/s Suraj Enterprises		M/s Shree Ji Enterprises
160	(07HWVPS6195C1ZM)	170	(07ICLPK7543H1Z4)
169	H.No10, Harphool Vihar, Baprolla,	170	Ground Floor, C-120, Okla Vihar, Jamia
	Nangloi, Delhi, 110041.		Nagar, Delhi, 110025.
	M/s K.N. Traders		M/s Rudra Enterprises
	(07JKVPS7810G1ZC)		(07IUPPK3177P1ZK)
171	H. NoSRS-73, 1st Floor, National	172	Plot No. H 1, Shop No. 103, Garg Tower
	Market Naraina, Opposite PNB Bank,	-/ -	Neta Ji Subhash Place, Pitampura,
	Naraina, Delhi, 110028.		Delhi, 110034.
	M/s Shiv Sales		M/s Gee Key Sales
	(07JVRPK7522Q1ZG)		, 5
173		174	(07IQCPS2541L4ZC)
	9/3638, Ground Floor, Shanti Mohalla,		H. No. 126, Block-C, Ph-I, Naraina
	Gandhi Nagar, Delhi, 110031.		Industrial Area, Delhi, 110028.
	M/s Phonix Traders		M/s G.S. Trading
175	(07KLOPS9373D1Z8)	176	(07IKIPS8885M3ZQ)
1/3	WZ-48, Shakurpur Village, Opposite M-	1/0	Unit 2016, 2 nd Floor, Plot No-3, Dwarka
	Block, DDA Market, Delhi, 110034.		Sector-12, Pocket-6, Delhi, 110075.
	M/s Jay Trading Co.		M/s Ravi Kumar Laminates
	(07KUSPK7859B1ZV)	_	(07IVWPK9323M1ZH)
177	FT-2909/20, 20 Feeta Road, Seelam	178	Kh-398, Ground Floor, Shahbad,
	Pur, Delhi, 110028.		Daulatpur, Delhi, 110042.
	Directorate Converse of Coads and Somicas Tax Intelligence	<u> </u>	

	M/z Ostas za Estas za	1	M/z Ois -h Trus dama
	M/s Satyam Enterprises		M/s Singh Traders
	(07KXYPK9568J1Z0)	180	(07NDAPS2698L1ZL)
179	H. No. A69-A, 2 nd Floor, South Ganesh		Off No. 253/74, Near Hanuman
	Nagar, Gali No. 4 Near Gupta General		Mandir, Bijwasan Rd, Mahipalpur,
	Store, Delhi, 110092.		Delhi, 110037.
-	M/s Singh Enterprises		M/s Salasar Enterprises
	(07LEGPK5418H1Z8)		, _
181		182	(070HZPS8032L1ZZ)
	G-14/5, Shop No. 18, Subhas Nagar,		38309, Main Market, Najafgarh, Delhi,
	Delhi, 110027.		110028.
	M/s Micro Traders		M/s Nitin Trading House
			(07OIBPS3345R1ZA)
183	(07LEGPK5425N1ZW)	184	Kh No 33/8/3, Ground Floor, Village
	Gali No. 15/12, MCD Office, Rajouri		Zindpur, Near Shiv Mandir, Delhi,
	Garden, Delhi, 110027.		110036.
	M/a Kuman Trading Company		
	M/s Kumar Trading Company		M/s Gupta Enterprises
185	(07LLYPS5428N1ZO)	186	(07OPNPS8612L1ZS)
	H. No. A-37, Shiv Bucks Park, Nagloi,		9092, Shiv Chowk, New Market Chawri
	Delhi, 110041.		Bazar, Delhi, 110020.
	M/s Shivanju Traders		M/s Saraswati Enterprises
	(07LVWPS1348M1ZD)		(07OWUPS4414J1ZJ)
187	A-3/3, 1 st Floor, Paschim Vihar, Near B-	188	Plot No. 118A, C-J, Kherki Extension,
	2 Blk, DDA Market, Delhi, 110063.		Saket, Delhi, 110017.
			baket, Denn, 11001/.
	M/s Imra Sales Rajasthan		M/s Basic Traders Rajasthan
	(08AOGPK6533E2ZZ)		(08AAKPQ9466A1ZD)
189	Office No701, E-2, 7th Floor, KJ City	190	801, 8 th Floor, K J City Tower, Ashok
	Tower, Ashok Marg, C-Scheme, Jaipur,		Marg, C-Scheme, Jaipur, 302001.
	302005.		Marg, e-beneme, saipur, 302001.
	M/s Ravi Kumar Suppliers		M/s Zodiac Traders
	(08AMFPB9365E1Z2)		(08AJVPA9330R1ZD)
191	S-225, 2 nd Floor, Mangalam Fun Squire	192	Plot No. 2774, Ground Floor, Road No
	Durga Nursery Road, Udaipur, 313003		15 Vki, Jaipur, 302013.
	M/s Mantova Enterprises Pvt. Ltd.		M/s Nayak Trading Company
193	(09AALCM8399L1ZC)	194	(09AIAPN1026D1ZT)
	Plot No-8, Gata No237, Village		Bakshi Ka Talab, Ramendra Vihar
	Mubarakpur, Lucknow, 226021.		Colony, Lucknow, U.P., 226002.
	M/a Chauhan Tradara		M/s BPSR Industries Pvt. Ltd.
	M/s Chauhan Traders		(09AAHCB5448H1ZG)
195	(09AGCPC4247K1ZF)	196	Shop No-91, Plot No CP-1, Jeewan
	17-B, G/F, Co-operative Industrial Area,		Plaza, Viram Khand, Gomti Nagar,
	Udyog Nagar, Kanpur, U.P., 208022.		Lucknow, U.P., 226010.
			M/s Gwalior Enterprises Pvt. Ltd.
	M/s M K Trading Co.		-
197	(09AILPC7741F2Z6)	198	(09AAHCG0818Q1Z4)
	Kamla Pur, Sitapur, U.P., 261302.		19B/101, Vrindavan Yojna, RBL Road,
			Lucknow, U.P., 226010.
	M/s M.K. Trading Co.		M/s Shiva Enterprises
100	(09AOZPY6635A1Z6)	000	(09AJRPP5579P1ZT)
199	S-178, Lekhraj Khajana, Faizabad Road,	200	84/113, Keshav Bhawan, Carwalo
	Lucknow, U.P., 226016.		Nagar, Kanpur Nagar, U.P., 208003.
201	M/s Ghaziabad Enterprises Pvt. Ltd.	202	M/s Vijay Sales
	Directorate Converse of Coods and Sources Tax Intelligence		,



	(0014UCC0807U17M)		(09BDOPP0550N1ZZ)
	(09AHCG0827H1ZM)		
	404, Trinity Harmony Apartment, Wazir		Plot No. 30, G-5, D N Singh Complex,
	Hasan Road, Dalibagh, Lucknow, U.P.,		Maharshi Nagar, IIM Road, Lucknow,
	266001.		U.P., 226013.
	M/s K C Laminates		M/s Tripathi Enterprises
	(09ANOPN1634L1ZI)		(09BFTPT4792K1Z8)
203	Office No. B-4, 80/17, 1 st Floor, Jagat	204	Nandgaon Road, Samken Colony Ke
	Singh Complex, Gurudwara Road, Naka		Samne, Kosi Kalan, Chhata, Mathura,
	Hindola, U.P., 226004.		U.P., 281403.
	M/s Chandan Trading Company		M/s Lavanya Trading Co.
0.05	(09ARMPJ4078Q1ZU)	0.06	(09BKYPD3812J1ZR)
205	Bhakhamau Behata, Paikaramau,	206	Shop No. 3, Gandhi Nagar, Kanpur,
	Lucknow, U.P., 227202.		U.P., 208001.
	M/s Rabindra Laminates		M/s S K Trading Company
	(09AVKPN6952D1Z8)		(09BPTPB6759L2ZZ)
207	132/717-A, Munshipurwa, Near	208	Shop No105, Palika Bazar,
,	Transport Nagar, Kanpur Nagar, U.P.,		Kapoorthala, Aliganj, Lucknow, U.P.,
	208023.		226024.
	M/s Manoj Laminates Sales		M/s Singha Enterprises
	(09AZOPB7727N1ZO)		(09COXPK7095E1Z4)
209	Magath Asthi Road Bagdi, Tehsil, Bakshi	210	G-3/183, Arogya Hospital, Vaishali
	Ka Talab, Lucknow, U.P., 226201		Sector 6, Ghaziabad, U.P., 201014.
	M/s Govind Enterprises		M/s S.A. Enterprises
	(09CBIPA0305H1Z7)		(09BXNPA3450K1ZB)
011	N.H. 2, 1 st Floor, In front of Anaj Mandi	212	E 2/8, Palika Bazar, Sector-C,
211	Gate No. 1, Kosi Kalan, Mathura, U.P.,	212	Kapoorthala, Aliganj, Lucknow, U.P.,
			226024.
	281403.		-
	M/s Unique Services		M/s Ripu Trading Company
213	(09BTDPM7832B1ZQ)	214	(09CVFPR9246F1Z2)
	H.No413/4, Ground Floor, Gazipur		6/7, Labour Colony, Dada Nagar,
	Near School Lane, Gazipur, U.P., 110092		Kanpur Nagar, U.P., 208022.
	M/s Sagar Trading Company		M/s Anurag Sales
215	(09EAVPB1764H1ZC)	216	(09CECPK3695F1ZA)
	Bakshi Ka Talab, Village Mastipur,		B-322-A, Nandi Kunj Nandgram,
	Mohanlalganj, Lucknow, U.P., 227300.		Ghaziabad, U.P., 201003.
	M/s Naresh Sales		M/s Tushar Laminates Sales
217	(09DHFPD7637M1ZU)	218	(09CJBPB4851J1Z8)
-1/	Shop No07, Bhakhamau, Bhakhamau	210	Plot No CP-03, Mishrapur, Lucknow,
	Kursi Road, Lucknow, U.P., 226021.		U.P., 209870.
	M/s K.M. Trading Co.		M/s Vikram Sales
010	(09DJQPK5086N1Z6)	200	(09COMPA0461D1ZB)
219	Infront of Transformer, Nabiganj,	220	Plot No17, Kh No58, IIM Road,
	Nawabganj, Barabanki, U.P., 225305.		Semra Gaudi, Lucknow, U.P., 226020.
	M/s Kritika Trading Co.		M/s Surya Trading Company
	(09DLHPR6532R1Z3)		(09ETKPS6789F1ZO)
221	Telephone Exchange, Sonda Road,	222	Radha Krishna Pandey, Atariya,
	Murad Nagar, Ghaziabad, U.P., 201206.		Sidhauli, Sitapur, U.P., 261303.
223	M/s G.S. Trading Co.	224	M/s Tanya Trading Company
J			,



		1	
	(09DMHPK7624A1Z4)		(09EXHPP4251A1ZJ)
	Mallahi Tola, Near Jal Sansthan,		15/2, Krishna Nagar Market, Lucknow,
	Thakurganj, U.P., 226016.		U.P., 226023.
	M/s P.C. Supplier Co.		M/s Shivam Enterprises
	(09DWWPS0227J1ZT)		(09FCQPD3880Q1ZM)
225	159, Sahara Shopping Center, Faizabad	226	6 and 7 New Chauhan Singh Market,
	Road, Indira Nagar Lucknow, U.P.,		Sitapur Road Tehsil Mod Mampur
	226016.		Bana, Lucknow, U.P., 226201.
	M/s Dev Warapers		M/s R S Enterprises
	(09DDRPG1575H1Z5)		(09GUGPS2927N1ZR)
227	Shop No. 3, LGF, Sai Star Complex,	228	Khasra No54, Navikot Nandana,
	Sitapur Road, Mohibullapur, Lucknow,		Sitapur Road, Bakshi Ka Talab,
	U.P., 226021.		Lucknow, U.P., 227202.
	M/s Navnirman Traders		M/s Nisha Sales
	(09HELPK0210L1ZE)		(09GXUPS5402R1Z7)
229	TC/14, 3 rd Floor, Shashtri Commercials,	230	H. No. 554, Rajeev Nagar,
229	Vibhooti Khand, Gomti Nagar,	230	
			Mahaviranpura, Jhansi Khas, Jhanshi,
	Lucknow, U.P., 226010.		U.P., 284003.
	M/s Prashanta Laminates		M/s Manish Enterprises
	(09ERSPB1888L1ZY)		(09HAIPS2009Q1ZY)
231	A/F-21, 2 nd Floor, Parking No. 2, TP	232	Near 132 KVA Bijli Ghar, Nandgaon
	Nagar, Kanpur Road, Lucknow, U.P.,		Road, Kosi Kalan, Chhata, Mathura,
	226023.		U.P., 281403.
	M/s Prashant Trading Company		M/s Shravan Packesing
000	(09EFZPK0434N1ZN)	234	(09KJKPK2903P1ZH)
233	Shop No. FF-09, Arcate-1, IIM Road,		Ground Floor, Gram Barawankala,
	Eldeco City, Lucknow, U.P., 226016.		Jehta Road, Lucknow, U.P., 226101.
	M/s Rohit Enterprises		M/s Manchester Enterprises Pvt. Ltd.
	(09HMDPK2928B1Z5)	236	(18AALCM8855D1Z1)
235	Ijjat Nagar Colony, Mahipat Mau,		300Sq, Orchid Garden, Khanamukh
	Kakori, Lucknow, U.P., 226101.		Jalukbari Guwahati, Assam, 781014.
	M/s Khalid Traders		M/s Kamakhya Trading Co
	(18FCMPK4971D1Z9)		(18AJUPU0082F1ZR)
237	50Sq Feet, 1 st Floor, Sri Ram Market,	238	75 Sqt, Orchid Garden, Khanmukh
	Chatribari, Guwahati, Assam, 781001.		Jalukbari, Guwahati, 781014.
	M/s Mantova Enterprises Pvt. Ltd.		M/s Mas Sales Corporation
	(18AALCM8399L1ZD)		(19ARFPM0150K1ZS)
239	Hajo Road, Amingaon, Guwahati,	240	23, Ground Floor, Sir Syed Ahmed
	Kamrup, Assam, 781031.		Road, Kolkata, W.B., 700014.
	M/s Impex Global		M/s Polymart Traders
	(20AAGFI6942P1Z2)		(21AOGPK6533E2ZB)
241	194, Getalatu, Opposite BSNL Training	242	Plot No. 2335/4061/5323, Jagatpur,
	Center, Vikash, Sadar, Ranchi,		Cuttack, Orissa, 754021.
	Jharkhand, 835217.		
	M/s Basic Traders		M/s R.B. Enterprises
	(21AAKPQ9466A1ZP)		(22IVTPS1390K1ZT)
243	Plot No. 311F, CDA Sector-10, Market	244	Shop No-6, Manglam Mall, Near
	Nagar, Cuttack, Odisha, 753014.		Agrasen Chowk, Samta Colony, Raipur,
			Chhattisgarh, 492001.



M/s Astha TradersM/s Dilip Enterprises(22BXDPG5417J1ZQ)(22DGAPS4834P1ZZ)245Rajesh Complex, Block No-9, Parking No-6, Transport Nagar, Ravatbhata, Raipur, Chhattisgarh, 492003.246Shop No-42, Block No-07, Rawabh Transport Nagar, Raipur, Chhattis 492003.3492003.	
	<i>v</i> ,
Raipur, Chhattisgarh, 492003. 492003.	
M/s Bhagyashree Sales (22ADBPT8598E1Z8)M/s Bhagyashree Sales (22ADBPT8598E1Z8)M/s Raipur Sales (22BTDPJ4048N1ZM)247Shop No6 Manglam Mall, Near Agrasen Chowk, Samta Colony, Raipur, Chhattisgarh, 492001.248M/s Raipur Sales (22BTDPJ4048N1ZM)	
M/s Choudhary Sales (22APSPC9712N1ZI)M/s Asha Industries (23ABVPO1550F2ZM)249Shop No-5, Block No-5, Rawabhata, Transport Nagar, Raipur, Chhattisgarh, 492003.250M/s Asha Industries (23ABVPO1550F2ZM)79, Iqtadar Manzil, Opp Moti Masy Bhopal, M.P., 462001.800800	id,
M/s Simran Trading (23ADWPT8362K1ZM)M/s D.K. Enterprises (23AHHPT2260P1ZY)251A/7, Shankar Puri, Govardhan Colony Bhind Road, Gole Ka Mandir, Gwalior, M.P., 474005.252459 North Avenyu, Sukhliya Near Gineshwar School, Vijay Nagar, In M.P., 452010.	dore,
M/s Om Sai Trading Company (23AMWPM1054A1ZC)M/s Tomar Sales (23APYPT1275M1Z1)253Shop No9, TT Nagar, Pipliya Kumar Dewas, Near Metro Shopping Mall, Indore, M.P., 453771.254M/s Tomar Sales (23APYPT1275M1Z1)474003.	Р.,
255M/s Ashta Traders (23BXDPG5417J1ZO) Jayendraganj, F-27, Sanjay Complex, Lashkar, Gwalior, M.P., 474001.M/s Gaurav Corporation (23AVVPG2313G1ZT) I4, Aditya Puram, Airport Road, Gwalior, M.P., 474002.	
257M/s J M D Trading Co (23EHFPP8744G1Z2) Shope No2, Gram Mohala, Bypass Road, Bhopal, M.P., 462023.M/s HR Enterprise (23BHFPH9745E1ZE) 1/2 C-01, Vayu Nagar, Bhind Road Gwalior, M.P., 474020.	,
M/s Kumar Traders (23ELVPK9548F1ZG) H.No. 5, Bihari Colony, Vidisha Road, Bhanpur, Bhopal, M.P., 462038M/s Kansana Enterprises (23BPJPS8789B1ZE) 6, Chota Bangadha Road, Indore, I 452005	М.Р.,
261M/s Rawat Trading Company (23FLVPR3392P1ZX) E19, Amaltas Colony, Gole Ka Mandir, Gwalior, M.P., 474005.M/s Dharmveer Sales (23BPJPS8789B2ZD) 47 Jiwajiganj, Gandhi Hospital Ro Morena, 476001.	ad,
M/s Ahmana Traders (23GQNPS5195F1Z9)M/s P S Corporation (23HRAPS7815D1ZS)26330, Liladhar Colony, Vidisha Road Bhanpur Chouraha, Bhopal, M.P., 462010.264M/s P S Corporation (23HRAPS7815D1ZS)H. No. 118, Barkhedi, Aish Bagh R Bhopal, M.P., 462008.264M/s P S Corporation (23HRAPS7815D1ZS)	oad,
265 M/s Alfa Enterprises 266 M/s S M Traders 265 (24ATUPD1928M1ZB) 266 (24DKHPM5514D1ZF) Shop 2, 1 st Floor, Opp. Sarni Kamdar 266 Godown No. 9, S.K. Tiles Compour Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit Page 13 of Z	



	Society, Nr. N.K. School, Jivraj Park, Ahmedabad, Gujarat, 380051.		Sarkhej Sanand Road, Sarkhej, Ahmedabad, Gujarat, 382210.
267	M/s D.K. Enterprises (27AHHPT2260P1ZQ) H. No. 1016-A Bhandara Road, Near Ajanta Tea Company, Hansapuri, Maharashtra, 440018.	268	M/s A M Traders (29CMQPP6968Q1ZF) No. 46, Situated Opp to Christ King School, 7 th Cross Akshaya Nagar, New Manjunath Layout Ramurthy Nagar, Bengaluru Urban, Karnataka, 560016.
269	M/s S9 Trading Co. (36AAQPZ7304Q1ZL) 14, 1, 482, Darusalam Opp. Voulga Hotel Goshamahal Road, Hyderabad, Telangana, 500001.	270	M/s Mask Enterprises (36BNVPK3975K1Z2) 9-3-125/2/A, Shahatam Nagar Mohammadi Lines Golconda, Hyderabad, Telangana, 500008.
271	M/s Crystal Traders (36BGUPA2323M1Z8) 18-13-8/A/28 and Farhen, Gagan Pahad, Katedan, Rangareddy, Telangana, 500077.	272	M/s MAZ Traders (36BPAPA5534D1ZH) 22-8-588/1, Lakkad Kote, Chatta Bazar, Charminar, Hyderabad, Telangana, 500002.
273	M/s Surya Enterprises (36BHEPT2410B1ZU) Sy No 15, 24, 25, 26, 27, Kothaguda, Kondapur, Telangana, 500084.	274	M/s Katyayni Enterprises (07AHGPR4479K1ZO) G/F, 10/33, Vishwas Nagar, Patel Gali, Shahdara, Delhi, 110032.
275	M/s Bharat Transport Company Pvt. Ltd, B-134, Sector-69, Noida, U.P.	276	Shri Sujeet Kumar Singh, Flat No. 102, Tower Marvella, Mahagun Moderne, Sector-78, Noida, U.P.
277	M/s Raj Kumar Transports, Property No. 461, G-Block, 40 Feet Road, Near Shubham Garden, Molar Band Extension, Badarpur, Delhi, 110044.	278	M/s Pitambara Freight Carriers, Old Sodi Filing Station, Maharaj Pura, Gwalior, M.P.
279	M/s Paras Transport Co., Shop No 2B, Ground Floor, Anant Best Home 4, Sarfabad, Sector-72, Noida, U.P., 201301.	280	M/s Sahara Transport Co. D-59, Sector-07, Noida, U.P., 201301.
281	Shri Shekhar Kumar Gupta, Flat No. 72, Vardan Apartment, I.P. Extensions, Madhu Vihar, Delhi.	282	Shri Sandeep Kumar, H. No. C-37/F-172, Shalimar Garden Etxn2, Sahibabad, Ghaziabad-201005.
283	Mohd. Shadab Quadri CDA, Sector-10, Plot No. 1F-311, Cuttack, Odisha -753014.	284	Mohd. Ali Akram Khan 630, Pension Lane Buxi Bazar, Cuttack, Odisha.
285	Shri Dipanshu Gupta S-30, CB90, Salt Lake, Kolkata-700091	286	Shri Sarang Jhunjhunwala S-2-B, Siddhimani Apartments, Street No. 150& 67, Bhinova Bhave Road, Kolkata-700038.
285	M/s Dealistix India Pvt. Ltd., (07AAHCD8866B1ZI) G-55, S/F, Vikash Marg, Laxmi Nagar, New Delhi-110092.	286	Shri Ratan Chand H.No.162, Shiv Mandir Gali, Old Kondli, East Delhi, Delhi-110096.
	Directorate Ceneral of Coods and Services Tax Intelligence		Zonal Dirit Page 14 of 230



Sl. No.	Abbreviations	Abbreviations Full form
1	M/s MEPL	M/s Montage Enterprises Pvt Ltd., Jammu (01AACCM8173H1ZM), Haridwar (05AACCM8173H1ZE), Noida (09AACCM8173H1Z6), & Malanpur (23AACCM8173H1ZG)
2	M/s MSPL, Delhi	<i>M/s Montage Sales Pvt. Ltd., Delhi (07AAMCM9016D1ZG).</i> <i>Now known as M/s Lagrowth Associates Pvt. Ltd.</i>
3	M/s MFSPL, Lucknow	M/s Montage Flexipack Sales Pvt Ltd., Lucknow (09AAMCM9015A1ZJ) Now known as M/s Neemsar Vyappar Pvt. Ltd.,
4	M/s MPSPL, Gwalior	M/s Montage Printpack Sales Pvt Ltd., Gwalior (23AAMCM9078M1ZP). Now known as M/s Pitambara Business Promotions Pvt. Ltd.
5	M/s BTCPL, Noida	M/s Bharat Transport Company Pvt. Ltd., Noida
6	DGGI	Directorate General of GST Intelligence, Meerut Zonal Unit/Ghaziabad Regional Unit/Dehradun Regional Unit

Abbreviations used frequently in this Notice is tabulated hereunder:

1. BRIEF OF THE PROFILE AND INTEL:

1.1 M/s Montage Enterprises Pvt Ltd., having manufacturing units Jammu (01AACCM8173H1ZM), Haridwar (05AACCM8173H1ZE), Noida (09AACCM8173H1Z6), & Malanpur (23AACCM8173H1ZG), are engaged in manufacturing and supply of goods falling under HSN 76072090 (*Printed Paper Aluminium Foil Laminate*); 48239018 (*Printed Paper Foil Laminate*); 39232990 (*Printed Plastic Laminate*) and 39206290 (*Other Printed Plastic Laminate*).

1.2 An intelligence was received that M/s MEPL, was indulged in issuance of tax invoices to various bogus (Non-existent/non-operational) firms whereas the corresponding goods i.e., laminate/packaging material used for packaging of goods were delivered to Pan Masala/Tobacco manufacturing units.

1.2 Whereas, during the processing of the intel, it was gathered that during the period July 2017 to September 2019, the manufacturing units of M/s MEPL, were directly involved in issuing invoices to bogus (Non-existent/non-operational) firms and suppling underlying goods to Pan Masala/Tobacco manufacturing units. However, since October 2019 the tax invoices to bogus (Non-existent/non-operational) firms were being issued by the depots of M/s MEPL, namely M/s Montage Sales Pvt. Ltd., Delhi, M/s Montage Flexipack Sales Pvt. Ltd., Lucknow, M/s Montage Printpack Sales Pvt. Ltd., Gwalior, M/s Montage Packaging Sales Pvt. Ltd., Jaipur, and M/s Montage Marino Sales Pvt. Ltd., Valsad, and the underlying goods were supplied to Pan Masala/Tobacco manufacturing units. Hence, it appears that M/s MEPL came with a nefarious design to distance itself



i.e., M/s MEPL had inducted a layer between the company and bogus (non-existing/non-operational) firms.

2. DETAILS OF THE SEARCH:

Whereas, on the basis of above intel, searches were conducted at various premises related with M/s MEPL, its depots, transporters and suspicious firms appearing bogus (non-existent/non-operational), reason being their GSTIN was cancelled and firms were active for a very short period. The outcome of searches conducted at the premises related with M/s MEPL, its depots and transporters are briefly discussed hereunder and the searches/inspection carried at the premises of suspicious firms is discussed in later paras.

2.1 SEARCHES CONDUCTED AT THE PREMISES RELATED WITH M/S MONTAGE ENTERPRISES PVT. LTD.:

- M/s Montage Enterprises Pvt. Ltd., C-20-22, Sector-57, Noida, U.P., 201301 (RUD-01): The search proceeding was conducted in the presence of Shri Ram Mohan Pandey, AGM (Commercial) and Shri Prashant Kumar Singh, Sr. DGM (Finance & Account) of M/s MEPL, Noida. The Panchnama dated 15.06.2021 was drawn on the spot. Further, statements of Shri Ram Mohan Pandey, AGM (Commercial) and Shri Prashant Kumar Singh, Sr. DGM (Finance & Account) of M/s MEPL, Noida were also recorded on the spot.
- *M/s* Montage Enterprises Pvt. Ltd., 29A, Industrial Area, Malanpur, Bhind, M.P., 477117 (RUD-02): The search proceeding was conducted in the presence of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Bhind. The Panchnama dated 15.06.2021 was drawn on the spot. Further, statements of Shri Sunil Kumar Tiwari, Senior Manager (Commercial); Shri Pradeep Kumar, Deputy General Manager (Production) and Shri Pawan Pandey, Junior Engineer of M/s MEPL, Bhind, Malanpur were also recorded on the spot.
- iii. M/s Montage Enterprises Pvt. Ltd., Plot No.13, Sector-11, IIE SIDCUL, Haridwar, Uttarakhand, 249403 (RUD-03): The search proceeding was conducted in the presence of Shri Rambilas Prasad, DGM (Accounts) of M/s MEPL, Haridwar. The Panchnama dated 14/15.06.2021 was drawn on the spot. Further, statements of Shri Kapil Dev Sharma, Assistant Manager (Store incharge, Raw Material); Shri Sanjeev Kumar, Manager (Commercial) and Shri Rambilas Prasad, Deputy Manager (Accounts) of M/s MEPL, Haridwar was also recorded on the spot.
- *iv.* M/s Montage Enterprises Pvt. Ltd., Lane No. 4, Phase-1, SIDCO Industrial Area, Bari Brahmana, Samba, Jammu & Kashmir, 181133 (RUD-04): The search proceeding was conducted in the presence of Shri Ajay



Kumar Tripathi, DGM (Production) of M/s MEPL, Jammu. The Panchnama dated 16.06.2021 was drawn on the spot. Further, statements of Shri Ajay Kumar Tripathi, DGM (Production) of M/s MEPL, Jammu was also recorded on the spot.

- w. M/s Montage Sales Pvt. Ltd., Plot No. B-26, B-Block, Jhilmil Industrial Area, East Delhi, Delhi (RUD-o5): The search proceeding was conducted in the presence of Shri Punit Kumar Mishra, Senior Accounts Officer of M/s MSPL, Delhi. During the search proceedings, it was noticed that 03 vehicles (DL01LAC2492, DL01MA6575 & UP14HT8562) were parked outside the business premises of M/s MSPL, Delhi and all the vehicles were loaded with laminate of "SNK Pan Masala". The Panchnama dated 15.06.2021 was drawn on the spot. Further, statements of Shri Punit Kumar Mishra, Accountant and Shri Sushil Kumar Dwivedi, Manager (Dispatch Manager) of M/s MSPL, Delhi was also recorded on the spot.
- *wi.* M/s Montage Flexipack Sales Pvt. Ltd., Warehouse No.3, Back Portion, Village-Gahru, Pargana-Bijnore, Khasra No.1441, Old No. 1664/1, Daroga Khera, Opposite Bal Bhawan, Lucknow-Kanpur Road, NH-25, Lucknow, U.P., 226012 (RUD-06): The search proceeding was conducted in the presence of Shri Narinder Chopra, Senior Manager and Shri Arvind Kumar Pandey, Senior Officer, Dispatch of M/s MFSPL, Lucknow. The Panchnama dated 14.06.2021 was drawn on the spot. Further, statements of Shri Narinder Chopra, Senior Manager was also recorded on the spot.

Residential premise of Shri Nikhil Agnihotri, Director of M/s MFSPL, Lucknow was also searched on 15.06.2021 and his statement was recorded on the spot.

- *vii.* M/s Montage Printpack Sales Pvt. Ltd., Khasra No. 1610, Mahal Gaon, Near Saroj Fuel Shop, Jhansi Road, Gwalior (RUD-07): The search proceeding was conducted in the presence of Shri Anand Sharma, Deputy Manager (Accounts) of M/s MPSPL, Gwalior. The Panchnama dated 14.06.2021 was drawn on the spot. Further, statements of Shri Anand Sharma, Deputy Manager (Accounts), and Shri Devendra Bisht, Assistant Manager (Dispatch) of M/s MPSPL, Gwalior was also recorded on the spot.
- *viii*. C-17, Chi-IV, Greater Noida, U.P., being residential premise of Shri Arvind Gupta, Promoter Director of M/s MEPL (RUD-08): The search proceeding was conducted in the presence of Shri Arvind Gupta, Promoter Director of M/s MEPL. The Panchnama dated 15.11.2021 was drawn on the spot.
- *ix.* B-95, Sector-72, Noida, being residential premise of Shri H.S. Matharu, Director of M/s MSPL, Delhi (RUD-09): The search proceeding



was conducted in the presence of Shri H.S. Matharu, Director of M/s MSPL, Delhi. The Panchnama dated 15.11.2021 was drawn on the spot.

2.2 SEARCHES CONDUCTED AT THE PREMISES OF TRANSPORTERS OF M/S MEPL, M/S MSPL, Delhi; M/S MFSPL, Lucknow and M/S MPSPL, Gwalior, mentioned in the tax invoices issued to Fake Firms:

- *i*. Flat No. 102, Tower Marvella, Mahagun Moderne, Sector-78, Noida being residential premise of Shri Sujeet Kumar Singh, owner of M/s Bharat Transport Company Pvt. Ltd. (RUD-10): The premise was searched on 25.06.2021 in presence of Shri Sujeet Kumar Singh and during the search incriminating records in relation to supply of goods supplied by M/s MSPL, Delhi was recovered. A statement of Shri Sujeet Kumar Singh was also recorded on 25.06.2021.
- *M/s* Paras Transport Co., Shop No 2B, Ground Floor, Anant Best Home 4, Sarfabad, Sector-72, Noida, U.P., 201301 (RUD-11): Mr. Harsh owner of the premise informed that the said premise was vacated by M/s Paras Transport Co., on 17.09.2020, and no further whereabout of the company is available.
- iii. M/s Raj Kumar Transports, Property No. 461, G-Block, 40 Feet Road, Near Shubham Garden, Molar Band Extension, Badarpur, Delhi, 110044 (RUD-12): Mr. Rameshwar Singh S/o Mrs. Guddi Devi, informed that they had rented out one shop at the G/F of the said premises to M/s Raj Kumar Transports in December 2020 and produced a copy of rent agreement. Mr. Rameshwar Singh informed that no business activity was ever noticed from the said premises. Mr. Rameshwar Singh further informed that they have called several times Mr. Rajkumar owner of M/s Raj Kumar Transports on his mobile numbers i.e., 7789095406 and 8826230609 regarding pending rent and noncommencement of business but he never turned up. The number was also dialed by the officers but was found not working.
- *iv.* M/s Pitambara Freight Carriers, Old Sodi Filing Station, Maharaj Pura, Gwalior, M.P. (RUD-13): Mr. Devendra Singh Gurjar, supervisor of the firm was available at the premise at the time of search and informed that Shri Balkishan Sahu and Shri Ram Niwas Singh are the partner in the firm.
- *v.* **M/s Sahara Transport Co. D-59, Sector-07, Noida (RUD-14):** Mr. Amandeep Kukreja, Manager of M/s Sahara Transport Co., was available at the premise at the time of search and informed that his father Shri Subhash Kukreja is the proprietor of the firm, and the firm is running from the said address since last years.

3. OUTCOME OF ANALYSIS OF RECORDS RESUMED FROM THE RESIDENTIAL PREMISE OF SHRI SUJEET KUMAR SINGH, OWNER OF M/S BTCPL, NOIDA: Whereas,



during the search at the residential premises of Shri Sujeet Kumar Singh, owner of M/s BTCPL, Noida on 25.06.2021, a file was unearthed and resumed under the INS-02 of the Panchnama dated 25.06.2021 {@ Sl. No. 17 **(RUD-15)**}, which contained the details of laminate (Packaging Material) transported on the vehicles owned by M/s BTCPL, Noida. The details of transportation of laminate contained in the said file were maintained datewise for the period December 2020 to June 2021 (upto 8th June).

3.1 A sample of page no. 132, contained in the said file (*@* Sl. No. 17 of INS-02 of the Panchnama dated 25.06.2021) is depicted below:

5-Mar	5869	Amarpal	200	TS	6 414 700				
5-Mar	2671	Dinesh	260	TS	6,414.780	Mansesa	5,000	-	
5-Mar	2670	Sanjay	100	Vimal	8,147.210	Mansesa	5,000	-	
5-Mar	2663	Sanjay	115	Vimal	4,695.570	Sonipat	5,000	-	
5-Mar	5236	Viresh	200	KP	5,402.800	Sonipat	5,000		
5-Mar	2668	Hem Singh	284	PANBAG	8,732.950	Ghaziabad	4,000	-	
5-Mar	7158	Shyamanand	760	SNK	8,931.830	KHERAKALA	3,000	•	
6-Mar	2668	Gopal	200	TS	26,436.130	Kanpur	~	-	30,000
6-Mar	5869	Amarpal	150	TS	5,636.040	Patparganj	1,500	-	
6-Mar	2670	Sanjay	200		4,111.720	Patparganj	1,500	-	
	5236	Hem Singh	200	TS	6,298.500	Mansesa		-	
	6300	Lal Ram	100	KP	8,660.410	Ghaziabad	4,000	-	
6-Mar	2663	Viresh	100	TS	3,111.330	Mansesa	4,000	•	
6-Mar	6038	Nem Karan	207	COOLIP	7,018.770	NATHUPURA		-	
6-Mar	3036	Harishchand		S. PLUS	7,281.900	GORAKHPUR	•	-	
6-Mar			207	Vimal	9,703.860	Sonipat	10,000	-	
	2671	Dinesh	247	BANARSI KA	6,912.080	Lucknow	10,000		
6-Mar	2668	Gopal	96	KP	4,238.580	Ghaziabad	3,000		34,000
7-Mar	6300	Lal Ram	77	SILVER CLAS	3,053.820	LAHORI GATE	2,000	-	
7-Mar	5869	Amarpal	125	KP	5,108.310	LAHORI GATE	3,000	-	
7-Mar	2668	Gopal	200	TS	5,618.190	Patparganj	1,500		
7-Mar	2663	Viresh	150	TS	4,077.420	Patparganj	1,500		
7-Mar	2670	Sanjay	100	KUBER	3,005.390	Sonipat	5,000		
7-Mar	5236	Hem Singh	214	KP	9,925.500	Ghaziabad	4,000		
7-Mar	3036	Harishchand	323	TS	10,421.090	Mansesa	10,000		
7-Mar	5869	Amarpal	177	TOWER	2,353.000	BAWANA	3,000	-	
7-Mar	2669	Vinod	251	SNK	8,611.560	Kanpur	11,600		
7-Mar	6028	Manoj	699	KP	27,783.280	Lucknow	18,000	-	59,600
8-Mar	2998	Satendar				Mansesa	10,000	-	
8-Mar	2668	Gopal	12			Sonipat	5,000		
8-Mar	2663	Viresh				Sonipat	5,000		_
8-Mar	2670	Sanjay	-			Sonipat	5,000		
8-Mar	1317	2 viresh				Sonipat	4,000	-	
8-Mar	1317	2 viresh				Noida Del Noida	3,500		
8-Mar	5236	Hem Singh			•	Lucknow	15,000		
8-Mar	6037	Rakesh				Kanpur	20,000		67,500
9-Mar	2000	Gopal	112	-	5,242.500	SONIPAT		-	
9-Mai	2669	VIRESH	100)	4,680.800	SONIPAT			
9-Ma	2670	Sanjay	200		5,597.370	PATPADGANJ	1,500	-	

And whereas, on perusal of page no. 132 shown above reveals that it contains details of laminates transported by M/s BTCPL during 5th March 2021 to 9th March 2021 of various Pan Masala & Tobacco brands. Further it is observed that on 6th March 2021, 7281.90 Kgs of S.Plus brand laminate in 207 boxes was transported to Gorakhpur on vehicle no. 6038 owned by M/s BTCPL. Further, on scrutiny of invoices of M/s MSPL, Delhi it is seen that on 6th March 2021, tax invoice no. D5D2021/3077 was issued, showing supply of Printed Paper Aluminium Foil Laminate (HSN-7607) of Quantity 7281.900 kgs (207 boxes) to M/s Shri Mahaveer Ji Sales Corporation (07AAEPK3770F2ZT), Khasra No. 12/26, Bijapur, Village Budhpur, Bijapur, Delhi,



15

110082. Further in the tax invoice the vehicle no. was mentioned as UP53 ET 6038 (vehicle owned by M/s BTCPL) and transporter was shown as M/s Raj Kumar Transports (found non-existent at the registered address). For illustration, the tax invoice no. D5D2021/3077 dated 06.03.2021 is depicted below:

Works : B-26, B Block, Jhilmil Ind MONTAGE PAM : AAMCM9016D GSTIM : 07AAMCM9016D12G CIN : U51909D12019PTC35 Email : montagesalesp8gma	4266 il.com		0095						
Invoice No. : D5D2021/3077	Transportat	tion Mode	: 81	y Road			Ĩ	ORIGINAL	FOR RECIPIENT
Invoice Date : 06/03/2021	Vehicle Nun		1.1	P53ET-6038	8				
Reverse Charge : No State : 07 - Delhi	Date of Sup Place of Sup			6/03/2021 7 - Delhi				ACK No, : 1721 ACK DT. : 06-0	
Details of Receiver / Billed to			T			Details	of Consign	nee / Shipped t	
Name : SHRI MAHAVEER JI SALES CORPORATION Address : KHASRA NO.12/26, BIJAPUR, VILLAGE BUDHPUI BIJAPUR, NORTH EAST EDLHI DELHI - 110082 GSTIN : 07AAEPKJ3770F22T	R PAN : AA	ерк3770ғ		Name Address GSTIN	: KHAS BLIAN DELH	RA NO. 12	H EAST EDLH	VILLAGE BUDHPU	R
State : Delhi	State Code	e 0	7	State	: Delhi				State Code 0 7
Purchase Order : N/A Insurance : N/A Commodity : PTD/UN-PTD ALUMINIUM FOIL LAMINATED WIT	H PAPER			Transport GR No. &		1 RAJ KU 1 1254 0	MAR TRANSPO 6/03/2021	DRTS	
NO. NAME OF PRODUCT / SERVICE		HSN / S	AC	UOM	Q	JANTITY	BOXES	RATE	AMOUNT (Rs.)
1 PRINTED PAPER AL FOIL LAMINATE		7607	-	KGS		589.310	17	287.000	169132.00
		Total			728	1.900	207		2089905.30
Eighty Three Only. Invoice Amt.(Words) : Rs. Twenty Four Lakh Sixty Seven Thirty Eight Only. Delivery Terms: Ex Works to Party, Gross W1.7737.30 K/ EWB No : 701178999706 Dt. 06/03/2021 18:29 Valid Till :	n Thousand Nir gs. 07/03/2021 23:5	Distance(in I e Hundred ne Hundrec		30	728	Total T I.G.S. C.G.S. S.G.S. Tax Amo Round TCS 00	Taxable Va T. 0 9.00 T. 0 9.00 F. 0 9.00	4	2089905.30 0.00 188091.50 376183.00 0.30 1850.00 2467938.00
GST Amt. Payable (Words) : Rs. Three Lakh Seventy Siz Eighty Three Only. Invoice Amt.(Words) : Rs. Twenty Four Lakh Sixty Seven Thirty Eight Only. Delivery Terms: Ex Works to Party, Gross Wt.7737.30 K/ EWB No : 701178999706 Dt. 06/03/2021 18:29 Valid Till : IRN : 16/4cd87289033a97477eca5701b98b667bd6f46ad02/ Oeclaration : Certified that the particulars given above are to indicated represents the price actually charged additional consideration directly indivestly fro M 1. Any discute is subject to Dethi Jurisdiction only. O 2. This material is covered under above mentioned insun NA. T 3. In case of any Loss/Damage occur in any transit , ple Insurance Company and Copy to us immediately. In o E by the party.	Thousand One n Thousand Nie ge. 07/03/2021 23:5 cr6451be4250c6 true & correct an d and that there m the buyer ance Policy Numi ase intimate nea	Distance(in i e Hundred ne Hundred 59 a4e5 nd the amou is no flow o ber taken fn arest office o	nt f	39	728	Total 1 I.G.S. C.G.S. S.G.S. Tax And Round TCS 00 Total	Tr. 0 9.00 Tr. 0 9.00 Tr. 0 9.00 Off. 9.00 Off. 1 Off. 1 Mount aft NTAGE SAM	4	2089905.30 0.00 188091.50 376183.00 0.30 1850.00 2467938.00
Eighty Three Only. Invoice Amt.(Words): Rs. Twenty Four Lakh Sixty Seven Thirty Eight Only. Delivery Terms: Ex Works to Party, Gross Wt.7737.30 K/ EWB No : 701178999706 Dt. 05/03/2021 18:29 Valid Till : IRN : 1644cd87289033e97477ees3701b98b607fbdd446ad02 Declaration : Certified that the particulars given above are tindicated represents the price actually charge additional consideration directly indirectly fro N 1. Any dispute is subject to Delhi Jurisdiction only. O. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, ple Insurance Company and Copy to us immediately. In c E by the party.	e Thousand One in Thousand Nir gs. 07/03/2021 23:5 (56451be4250c6 true & correct, an d and that there im the buyer. ance Policy Numi ase intimate nea ase of delay loss	Distance(in in e Hundred ne Hundred 59 a4e6 is no flow o ber taken fr mest office o shall be bo	nt f om f the			Total 1 I.G.S. C.G.S. S.G.S. Tax Ame Round (TCS 90 Total)	axable Va T. 0 9.00 T. 0 9.00 Unt : GB 9.00 Unt : GB 075 % mount aft NTAGE SAM	er Tax LES PRIVATE LI sthorised Signa	2089905.30 0.00 188091.50 376183.00 0.30 1850.00 2467938.00
Eighty Three Only. Trovice Amt. (Words): Rs. Twenty Four Lakh Sixty Seven Thirty Eight Only. Delivery Terms: Ex Works to Party, Gross W1.7737.30 K/ EWB No : 701178999706 Dt. 06/03/2021 18:29 Valid Till : / IRN : 16/4cd87289033a97477eea5701b98bb67bb667bb6646ad02/ Dectaration 1 - Certified that the particulars given above are i indicated represents the price actually charge additional consideration directly indirectly fro N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insun N/A. D . In case of any Loss/Damage occur in any transit , ple Insurance Company and Copy to us immediately. In ci by party. Payment Mode - PLEASE MAKE PAYMENT BY A/C PAYEE C	Thousand One n Thousand Nir ge. 07/03/2021 23:5 cr6451be4250c6 true & correct an d and that there m the buyer. ance Policy Numl ase intimate nea ase of delay loss CHEQUE/DEMANC	Distance(in i e Hundred ne Hundred 59 a4e6 id the amou is no flow o ber taken fin arest office o is shall be boi D DRAFT/SV	nt f om of the ne	TRANSFER 1	IN FAVOL	Total 1 I.G.S. C.G.S. S.G.S. Tax Ame Round 1 TCS 00 Total 2	TAGE SALES	er Tax LES PRIVATE LI sthorised Signa	2089905.30 0.00 188091.50 376183.00 0.30 1850.00 2467938.00
 Eighty Three Only. Eighty Three Only. In case of any Loss/Damage occur in any transit, ple Instruction of the start of the start of the start of the start of the indicated represents the price actually charge additional consideration directly indirectly from the N. 1. Any dispute is subject to Delhi Jurisdiction only. Obstration 1: Note of any Loss/Damage occur in any transit, ple Instruction Company and Copy to us immediately. In credit of the party. 	Thousand One n Thousand Nie ge. 07/03/2021 23:5 cf6451be4250c6 true & correct an d and that there m the buyer ance Policy Numl ase intimate nea ase of delay loss CHEQUE/DEMAND DRAFT/NEFT/RT	Distance(in i e Hundred ne Hundred 59 a4e6 id the amou is no flow o ber taken fin arest office o is shall be boi D DRAFT/SV	nt f om of the ne	TRANSFER 1	IN FAVOL	Total 1 I.G.S. C.G.S. S.G.S. Tax Ame Round 1 TCS 00 Total 2	TAGE SALES	er Tax LES PRIVATE LI sthorised Signa	2089905.30 0.00 188091.50 376183.00 0.30 1850.00 2467938.00

And whereas, all the details like date of invoice, weight/quantity, No. of boxes and vehicle no. contained in page no. 132 of file @ sl. no. 17 relating to S. Plus brand matches with the said tax invoice except destination and name of the consignee. Further, on physical verification of M/s Shri Mahaveer Ji Sales Corporation (07AAEPK3770F2ZT), Khasra No. 12/26, Bijapur, Village Budhpur, Bijapur, Delhi, 110082 the same was found to be non-existent at their Principal place of business **(RUD-111A)**.

And whereas, it is seen that E-way bill for the tax invoice had also been generated which are duly reflected on the tax invoice. Further, an effort was made to track the movement of vehicle No. UP53 ET 6038 through online E-Way Bill MIS System, which

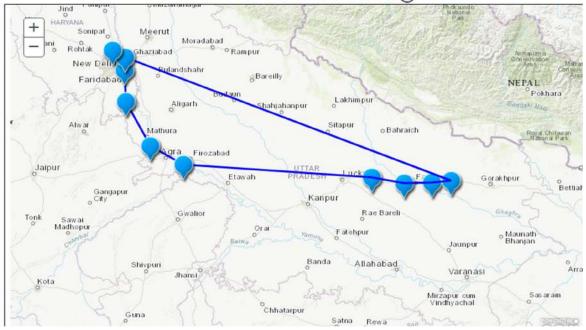


contained the toll details passed by vehicle. E-Way Bill No. 7011789999706 pertaining to tax invoice No. D5D2021/3077 dated 06.03.2021 showing vehicle No. UP53 ET 6038 was searched, and the details of toll passed by UP53 ET 6038, revealed that the said vehicle was transporting goods to Gorakhpur instead of destination mentioned in the tax invoice No. D5D2021/3077 i.e. Bijapur, Delhi. The following screenshots taken from the E-Way Bill MIS System shows the actual movement of vehicle.

			Detail	is of Lway-bin		
	Way Bill Detail	s	Dispatch From Place	Dispatch To Place		Assessable Value and Ta
EWB No.	EWB Date	Valid Till	& Pincode	Pincode	* HSN Code & Description	Value (Rs)
701178999706	06-03-2021 18:29:00	07-03-2021 00:00:00	DELHI 110095	DELHI 110082	7607 - ALUMINIUM FOIL (WHETHER O	2089905.30 & 376182.9
	Ve	ehicles ent	ered for the E-wa	ay bill[Part B deta	ils of only Road are consider	ed]
Vehicle No		Vehicle det	ails entry date in EWB		Next vehicle details entry d	ste in EWB(if any)
UP53ET603	8	06/03	3/2021 18:29:00		NA	
			Toll Details	s passed by Ve	hicle	
SI no		Toll Plaza	D	irection	Date/Time	State
T1	Badarpu	u <mark>r f</mark> aridabad Tol	l Plaza	South	07/03/2021 00:47:19	
Т2	Sr	inagar Toll Plaz	a	West	07/03/2021 02:03:51	HARYANA
Т3	Ma	ahuvan Toll Plaz	a	East	07/03/2021 04:00:16	UTTAR PRADESH
T4	AL	EP Main Plaza 2	81	East	07/03/2021 05:54:04	UTTAR PRADESH
T5	Ahr	madpur Toll Pla	za	South	07/03/2021 18:41:09	UTTAR PRADESH
T6	R	onahi Toll Plaza	L.	South	07/03/2021 21:25:21	UTTAR PRADESH
T7	Ch	aukadi Toll Plaz	a	North	07/03/2021 22:41:30	UTTAR PRADESH
T8	Mano	dawnagar Toll P	laza	North	07/03/2021 23:28:24	UTTAR PRADESH

Details of Eway-bill

Details of Tolls Passed by Vehicle in Bharath Map (





Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit F.No. DGGI/INV/GST/1757/2021/GRU

Page 21 of 230

3.2 Similarly, sample copy of page no. 172, contained in the said file (@ Sl. No. 17 of INS-02 of the Panchnama dated 25.06.2021) is depicted below:

11-Apr	0772	SHIVPRATAP	559					122
11-Apr	7183	SALENDRA	649	18,783.230	KNP			
11-Apr	7174	DHARMESH	549	21,915.230				
11-Apr	2992	SADDAM	595	25,352.270				
11-Apr	4001	MUKESH	621	18,530.500				
11-Apr	2997	AKHTAR	453	21,307.290		34,000		
11-Apr	0502	EMAMUDIN	603	18,654.600	Jhilmil to Lck	34,000		
11-Apr	7152	RUPNARAYAN H	0	20,755.550		34,000		
11-Apr	5869	AMARPAL	0		HP	30,000		
11-Apr	2667	VIRESH	0		Manesar	5,000		
11-Apr	7181	Roop singh	0	•	Manesar	5,000		
12-Apr	2669	BINOD	200		Indore to maggi	25,000	173,000	
12-Apr	6300	AMARPAL	35			1,500		
12-Apr	2668	GOPAL	235			2,500		
12-Apr	2671	DINESH	235		Patparganj	1,500		
12-Apr	5869	AMARPAL			Patparganj	1,500		
12-Apr	2663	VIRESH	200	and the second se				
12-Apr			100		1 0 1	1,500		
	2667	VIRESH	218	6,934.720		-		
12-Apr	2670	SANJAY	0		ROTI	300		
12-Apr	2670	Sanjay	250	8,041.580	Manesar	5,000		, N
12-Apr	2668	GOPAL	250	7,954.350		5,000		18/
12-Apr	2671	DINESH	99	3,117.330	and the second data	5,000		V V V
12-Apr	5869	AMARPAL	157	6,620.610	SONIPAT	5,000		
12-Apr	2994	RANJEET	298	7,682.370		34,000		1
12-Apr	2991	SUNEEL	597	18,006.570	LKN	34,000		NN 25-65
12-Apr	7182	ANOJ	0		Indore to maggi	17,000	113,800	V
13-Apr	2670	SANJAY	0		Manesar	-		-
13-Apr	2668	GOPAL	0		Manesar			
13-Apr	2671	DINESH	0		SONIPAT			
13-Apr	2663	VIRESH	100	4,495.090	Ghaziabad	3,000		
13-Apr	2667	VIRESH - 2	100	4,535.830	Ghaziabad	3,000		
13-Apr	2994	RANJEET	308	10,739.250	LKN	-		
13-Apr	2991	SUNNEL	597	18,006.570	KNP			

And whereas, on perusal of page no. 172 shown above reveals that it contains details of laminates transported by M/s BTCPL during 11th April 2021 to 13th April 2021 to various Pan Masala & Tobacco brands. Further, it is observed that on 11th April 2021, 20,755.550 Kgs of laminate in 603 boxes was transported to Kanpur on vehicle no. 0502. Further, on scrutiny of invoices of M/s MSPL, Delhi it is seen that on 11th April 2021, three tax invoices no. D5D2122/248, D5D2122/249 and D5D2122/250 were issued, showing supply of Printed Paper Aluminium Foil Laminate/Paper Laminate of Quantity 12046.810 kgs (338 boxes), 6028.160 kgs (184 boxes) and 2680.580 kgs (81 boxes) respectively totaling of 20,755.550 kgs (603 boxes) to M/s Jyoti Traders (07EWAPS6954P1ZK), A-175, Naraina Industrial Area, Phase-1 Naraina, Delhi, 110028. Further, in all the tax invoices the vehicle no. was mentioned as UP80 DT 0502 (vehicle owned by M/s BTCPL) and transporter was shown as M/s Radha Krishna Freight Carrier (found non-existent at the registered address). For illustration, all three invoice bearing nos. D5D2122/248, D5D2122/249 and D5D2122/250 dated 11.04.2021 are depicted below:



MONTAGE SALES P Works: B-26, B Block, Jhilmil Indu PAN : AAMCM9016D GSTIN : 07AAMCM9016D12G CIN : U51909DL2019PTC354 Email : montagesalesp@gmai	ustrial Area Eas 4266 il.com		95					
Invoice No. : D5D2122/248 Invoice Date : 11/04/2021	Transportati Vehicle Num	iber :	By Road UPSODT-0502	2				FOR RECIPIENT
Reverse Charge : No State : 07 - Delhi	Date of Supp Place of Sup		11/04/2021 07 - Delhi				ACK No, : 1721 ACK DT. : 4/11	10321233455 /2021 10:12:00PM
Details of Receiver / Billed to	o				Detail	s of Consig	nee / Shipped t	
Name : Jyoti Traders Address : A-175,, Naraina Industrial Area, Phase-1 Naraina, South West Delhi DELHI - 110028 GSTIN : 07EWAPS6954P12K State : Delhi Purchase Order : N/A	PAN : EW		Name Address GSTIN State	: A-17 Nara DELH : 07EV : Delhi	ina, South 11 - 11002 VAPS6954	P1ZK	ea, Phase-1	State Code 0 7
Insurance : N/A			GR No. &			4 KRISHNA FR 1/04/2021	EIGHT CARRIER	
Commodity : PTD/UN-PTD PAPER LAMINATE NO. NAME OF PRODUCT / SERVICE		HSN / SAC	UOM	Q	UANTITY	BOXES	RATE	AMOUNT (Rs.)
GST Amt. Payable (Words) : Rs. Four Lakh Ninety Two T Three Only. Invoice Amt.(Words) : Rs. Thirty Two Lakh Thirty Thous	Thousand Two H				I.G.S. C.G.S. S.G.S.	338 Taxable Va	227.000	1207260.90 1527365.00 2734625.90 2734625.90 0.00 246116.50 246116.50 492233.00
Delivery Terms: Ex Works to Party, Gross Wt.12553.61 M EWB No : 701186203251 Dt. 11/04/2021 22:12 Valid Till : 1 IRN : alead7047b25b6ba3b2bca536e5b5341c4a3f160905165 Declaration : - Certified that the particulars given above are to indicated represents the price actually charged additional consideration directly/ indirectly from N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insura N/A. T 3, In case of any Loss/Damage occur in any transit, plet Insurance Company and Copy to us immediately. In ca	12/04/2021 23:5 5eb6eb92db1424 true & correct and d and that there is m the buyer. ance Policy Numb ase intimate near	99422 d the amount is no flow of per taken from rest office of th	e		Total	0.100 % Amount aft	er Tax	3227.00 3230086.00
E by the party. Payment Mode - PLEASE MAKE PAYMENT BY A/C PAYEE C PLEASE MAKE THE PAYMENT BY A/C PAYEE CHEQUE/DEMAND 0	CHEQUE/DEMAND	DRAFT/SWIFT				NTAGE SALES	uthorised Signa	tory
WORKS : (1) 8-26, B Block, Jhilmil Industrial Area East Delhi-1100								
RI	EGD. OFFICE : P	Not No. B-16, V	illage Gazipu	r, Delhi -	110096			

Works:B-20, B Block, Jhilmi Ind PAN : AAMCM9016D GSTIN : 07AAMCM9016D12G CIN : US1909DL2019PTC35 Email : montagesalesp@gma	il.com	-11009						
Invoice No. : D5D2122/249	Transportation Mod	le :	By Road				ORIGINAL	FOR RECIPIENT
Invoice Date : 11/04/2021	Vehicle Number	- 190	UP80DT-050	2				
Reverse Charge : No State : 07 - Delhi	Date of Supply Place of Supply		11/04/2021 07 - Delhi				ACK No, : 1721	10321233507 /2021 10:12:00PM
	A DESCRIPTION OF THE OWNER OWNER OF THE OWNER OWNE		07 - Deini					
Details of Receiver / Billed to	0.				Details	of Consign	nee / Shipped t	
Name : Jyoti Traders Address : A-175,, Naraina Industrial Area, Phase-1 Naraina, South West Delhi DELHI - 110028 GSTIN : 07EWAPS6954P12K	PAN : EWAPS695	ŧ₽	Name Address GSTIN	: A-17 Nara DELH			ea, Phase-1	
State : Delhi	State Code (07	State	: Delhi	1			State Code 0 7
Purchase Order : N/A Insurance : N/A Commodity : PTD/UN-PTD PAPER LAMINATE			Transport GR No. &			KRISHNA FRI /04/2021	EIGHT CARRIER	
NO. NAME OF PRODUCT / SERVICE	HSN /	SAC	UOM	Q	UANTITY	BOXES	RATE	AMOUNT (Rs.)
	Total			602	8.160	184		1368392.30
GST Amt. Payable (Words) : Rs. Two Lakh Forty Six The Only. Invoice Amt.(Words) : Rs. Sixteen Lakh Sixteen Thous Only. Delivery Terms: Ex Works to Party, Gross Wt.6201.00 K	Approximate Distance(ousand Three Hundred and Three Hundred Eig gs.	Eleven		602	Total S I.G.S. S.G.S. Tax Ame Round TCS 00	Taxable Va T. T. 0 9.00 T. 0 9.00 punt : GST	8	1368392.30 0.00 123155.50 123155.50 246311.00 0.30 1615.00 1616318.00
Only. Invoice Amt.(Words) : Rs. Sixteen Lakh Sixteen Thous Only. Delivery Terms: Ex Works to Party, Gross Wt.6201.00 K EWB No : 741186203253 Dt. 11/04/2021 22:12 Valid Till :	Approximate Distance ousand Three Hundred and Three Hundred Eig gs. 12/04/2021 23:59	Eleven		602	Total S I.G.S. S.G.S. Tax Ame Round TCS 00	Taxable Va T. 0 9.00 T. 0 9.00 Sunt : GST Off .100 %	8	1368392.30 0.00 123155.50 123155.50 246311.00 0.30 1615.00
Only. Invoice Amt.(Words) : Rs. Sixteen Lakh Sixteen Thous Only. Delivery Terms: Ex Works to Party, Gross Wt.6201.00 K	Approximate Distance(ousand Three Hundred Eig and Three Hundred Eig gs. 12/04/2021 23:59 ic060905decd9def74e true & correct and the an d and that there is no floo im the buyer. ance Policy Number taken asse intimate nearest office	Eleven htteen hount w of		602	Total 1 I.G.S. C.G.S. S.G.S. Tax Ame Round TCS 00 Total J	T. @ 9.00 T. @ 9.00 Junt : GST Off .100 % whount aft	er Tax	1368392.30 0.00 123155.50 123155.30 246311.00 0.30 1615.00 1616318.00
Only. Invoice Amt.(Words) : Rs. Sixteen Lakh Sixteen Thous Only. Delivery Terms: Ex Works to Party, Gross Wt.6201.00 K EWB No : 741186203253 Dt. 11/04/2021 22:12 Valid Till : IRN : 4b38944d5570c2ed1f51a8e44dee08a3b5ec6(733a9824 Declaration : Certified that the particulars given above are indicated represents the price actually charge additional consideration directly/ indirectly fro N 1. Any dispute is subject to Delhi Jurisdiction only. Q 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit , ple Insurance Company and Copy to us immediately. In c by the party.	Approximate Distance ousand Three Hundred and Three Hundred Eig gs. 12/04/2021 23:59 ic060905decd9def74e true & correct and the an d and that there is no floo im the buyer. ance Policy Number taker case intimate nearest offic ase of delay loss shall be	Eleven htteen nount w of n from te of the borne	ę.		Total 1 I.G.S. C.G.S. S.G.S. Tax Amm Round TCS 00 Total J	Axable Va T. T. @ 9.00 T. @ 9.00 Unt : G&T Off .100 % MMUNTAGE SAM	er Tax LES PRIVATE Li	1368392.30 0.00 123155.50 123155.50 246311.00 0.30 1615.00 1616318.00
Only. Invoice Amt.(Words): Rs. Sixteen Lakh Sixteen Thous Only. Delivery Terms: Ex Works to Party, Gross Wt.6201.00 K EWB No : 741186203253 Dt. 11/04/2021 22:12 Valid Till : IRN : 4b38944d5570c2ed1f51a8e44dee08a3b5ec6f733a9824 Declaration : Certified that the particulars given above are indicated represents the price actually charge additional consideration directly/ indirectly fro N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, ple Insurance Company and Copy to us immediately. In or by the party. Payment Mode - PLEASE MAKE PAYMENT BY A/C PAYEE	Approximate Distance ousand Three Hundred and Three Hundred Eig gs. 12/04/2021 23:59 ic060905decd9def74e true & correct and the an d and that there is no floor m the buyer. ance Policy Number taker case intimate nearest offic ase of delay loss shall be CHEQUE/DEMAND DRAFT,	Eleven hteen nount w of n from borne	e TRANSFER	IN FAVOL	Total 1 I.G.S. C.G.S. S.G.S. Tax Ame Round TCS 00 Total J	Axable Va T. 09.00 T. 09.00 T. 09.00 Off 100 % Mmount aft INTAGE SALES I Au TAGE SALES I	er Tax LES PRIVATE Li	1368392.30 0.00 123155.50 123155.30 246311.00 0.30 1615.00 1616318.00
Only. Invoice Amt.(Words) : Rs. Sixteen Lakh Sixteen Thous Only. Delivery Terms: Ex Works to Party, Gross Wt.6201.00 K EWB No : 741186203253 Dt. 11/04/2021 22:12 Valid Till : IRN : 4b38944d5570c2ed1f51a8e44dee08a3b5ec6(733a9824 Declaration : Certified that the particulars given above are indicated represents the price actually charge additional consideration directly/ indirectly fro N 1. Any dispute is subject to Delhi Jurisdiction only. Q 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit , ple Insurance Company and Copy to us immediately. In c by the party.	Approximate Distance(ousand Three Hundred and Three Hundred Eig gs. 12/04/2021 23:59 ico60905decd9def74e true & correct and the an d and that there is no floo m the buyer. ance Policy Number taker case intimate nearest offic ase of delay loss shall be CHEQUE/DEMAND DRAFT, DRAFT/NEFT/RTGS IN FA	Eleven hteen nount w of n from borne	e TRANSFER	IN FAVOL	Total 1 I.G.S. C.G.S. S.G.S. Tax Ame Round TCS 00 Total J	Axable Va T. 09.00 T. 09.00 T. 09.00 Off 100 % Mmount aft INTAGE SALES I Au TAGE SALES I	er Tax LES PRIVATE Li	1368392.30 0.00 123155.50 123155.30 246311.00 0.30 1615.00 1616318.00



MONTAGE SALES Works: B-26, B Block, Jhilmil Ind PAN : AAMCM9016D GSTIN : 07AAACM9016DIZG CIN : U51909DL2019PTC33 Emmail : montagesalesp@gma	dustrial Area Eas 54266 ail.com		95					
Invoice No. : D5D2122/250	Transportat	ion Mode :	By Road				ORIGINAL	FOR RECIPIENT
Invoice Date : 11/04/2021	Vehicle Num		UP80DT-050	2				
Reverse Charge : No	Date of Supp	1.15) A.E.	11/04/2021				ACK No, : 1721	
State : 07 - Delhi	Place of Sup	oply :	07 - Delhi				ACK DT. : 4/11/	2021 10:12:00PM
Details of Receiver / Billed t	ю.				Details	of Consig	nee / Shipped t	0.
Name : Jyoti Traders Address : A-175,, Naraina Industrial Area, Phase-1 Naraina, South West Delhi DEUHI - 110028 GSTIN : 07EWAPS6954P1ZK State : Delhi	PAN : EW		Name Address GSTIN State	: A-17 Nara DELH	ina, South 11 - 110028 VAPS6954P	1	rea, Phase-1	State Code 0 7
Purchase Order : N/A	State Code	6 0 /	Transport			KRISHNA FR	EIGHT CARRIER	State Code 0 7
Insurance : N/A			GR No. &		: 135 11		Light brough	
Commodity : PTD/UN-PTD ALUMINIUM FOIL LAMINATED WT	TH PAPER	HSN / SAC	UOM	0	UANTITY	BOXES	RATE	AMOUNT (Rs.)
1 PAPER ALFOIL LAMINATE		76072090	KGS		2680.580	81	287.000	769326.50
		Total		268	0.580	81		769326.50
GST Amt. Payable (Words) : Rs. One Lakh Thirty Eight Seventy Nine Only. Invoice Amt.(Words) : Rs. Nine Lakh Eight Thousand Se	Thousand Four				I.G.S. C.G.S. S.G.S. Tax Amo Round TCS 00	T. 0 9.00 T. 0 9.00 punt : GST off	9% 9%	769326.50 0.00 69239.50 69239.50 138479.00 -0.50 908.00 908714.00
Delivery Terms: Ex Works to Party, Gross Wt.2826.48 K EWB No : 701186203264 Dt. 11/04/2021 22:12 Valid Till :	and the second s	i9						
IRN : 6/2ccf0/437d4838eebb464b443e2c35c0ee7120451924								
Declaration : - Certified that the particulars given above are indicated represents the price actually charge additional consideration directly indirectly fr	ed and that there				For MO	NTAGE SA	LES PRIVATE LI	MITED
N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, pit Insurance Company and Copy to us immediately. In of by the party.	ease intimate nea	rest office of th					uthorised Signa	tory
 N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, pli Insurance Company and Copy to us immediately. In or by the party. 	ease intimate nea case of delay loss	nest office of th shall be borne			10.05 1101		uthorised Signa	tory
N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, pli Insurance Company and Copy to us immediately. In o by the party. Payment Mode - PLEASE MAKE PAYMENT BY A/C PAYEE	ease intimate nea case of delay loss CHEQUE/DEMANC	nest office of th shall be borne	TTRANSFER 1			TAGE SALES		tory
N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, pli Data and the plant of	ease intimate nea case of delay loss CHEQUE/DEMANE	nest office of th shall be borne	TTRANSFER 1			TAGE SALES		tory
N 1. Any dispute is subject to Delhi Jurisdiction only. O 2. This material is covered under above mentioned insur N/A. T 3. In case of any Loss/Damage occur in any transit, pli Insurance Company and Copy to us immediately. In or by the party. Payment Mode - PLEASE MAKE PAYMENT BY A/C PAYEE	ease intimate nea case of delay loss CHEQUE/DEMANE	nest office of th shall be borne	TTRANSFER 1			TAGE SALES		tory

And whereas, all the details like date of invoice, weight/quantity, No. of boxes and vehicle no. contained in page no. 172 of file @ sl. no. 17 relating to Kanpur matches with the above depicted three tax invoices except destination and name of the consignee. Further, on physical verification of M/s Jyoti Traders (07EWAPS6954P1ZK), A-175,



Naraina Industrial Area, Phase-1 Naraina, Delhi, 110028 the same was found to be nonexistent at their Principal place of business **(RUD-196)**.

And whereas, it is seen that E-way bill for the tax invoice had been generated which are duly reflected on the tax invoices. Further, an effort was made to track the movement of vehicle no. UP80 DT 0502 through online E-Way Bill MIS System which contained the toll details passed by vehicle. E-way bills issued assigning vehicle No. UP80 DT 0502 on 11.04.2021 was searched, and it was found that following three e-way bills were assigned to vehicle No. UP80 DT 0502 on 11.04.2021. On tracking the movement of vehicle No. UP80 DT 0502 on 11.04.2021 through e-way bill no. 701186203251, revealed that the said vehicle was transporting goods to Kanpur instead of destination mentioned in the tax invoices i.e., Naraina, Delhi. The following screenshots taken from the E-Way Bill MIS System shows the actual movement of vehicle.

E-	Way Bill Detaik	5	Seller Place &	Buyer Place &		Assessable Value and Tax
EWB No.	EWB Date	Valid Till	Pincode	Pincode	HSN Code & Description	Value (Rs)
741186203253	11-04-2021 22:12:00	12-04-2021 23:59:00	DELHI 110095	DELHI 110028	48239018 - OTHER PAPER, PAPERBOARD,	1368392.30 & 246310.62
701186203251	11-04-2021 22:12:00	12-04-2021 23:59:00	DELHI 110095	DELHI 110028	48239018 - OTHER PAPER, PAPERBOARD,	2734625.90 & 492232.66
701186203264	11-04-2021 22:12:00	12-04-2021 23:59:00	DELHI 110095	DELHI 110028	76072090 - ALUMINIUM FOIL (WHETHER O	769326.50 & 138478.78

List of Valid E-Way Bill

Details of Eway-bill

	Way Bill Detaik	\$	Dispatch From Place	Dispatch To Place &		Assessable Value and Tax
EWB No.	EWB Date	Valid Till	& Pincode	Pincode	HSN Code & Description	Value (Rs)
701186203251	11-04-2021 22:12:00	12-04-2021 00:00:00	DELHI 110095	DELHI 110028	48239018 - OTHER PAPER, PAPERBOARD,	2734625.90 & 492232.66

Vehicles entered for the E-way bill[Part B details of only Road are considered]

	venicies entereu for ti	he L-way Diffpart	s details of only Road are consi	deredj					
Vehicle No.	Vehicle details entry date	in EWB	Next vehicle details ent	ry date in EWB(if any)					
UP80DT0502	11/04/2021 22:12:0	0	NA						
Toll Details passed by Vehicle									
SI no	Toll Plaza	Direction	Date/Time	State					
T1	Badarpur faridabad Toll Plaza	North	11/04/2021 23:54:45						
T2	Srinagar Toll Plaza	West	12/04/2021 01:14:08	HARYANA					
тз	Mahuvan Toll Plaza	East	12/04/2021 03:01:04	UTTAR PRADESH					
T4	ALEP Main Plaza 21	East	12/04/2021 04:51:28	UTTAR PRADESH					
T5	Anantram Toll Plaza	East	12/04/2021 14:30:00	UTTAR PRADESH					
Τ6	Barajore toll plaza	East	12/04/2021 16:10:23	UTTAR PRADESH					

West

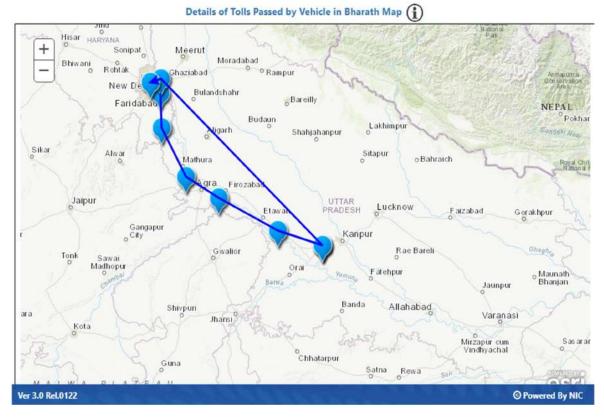
12/04/2021 21:35:38



Τ7

Barajore toll plaza

UTTAR PRADESH



3.3 Similarly, sample copy of page no. 231, contained in the said file (@ Sl. No. 17 of INS-02 of the Panchnama dated 25.06.2021) is depicted below:

9-May	2994	RANJEET	KP	496	21643.15	LKN	TIWARI	1 4
9-May	5236	HEMSINGH	TS	300	9556.55	MANESHAR	MAHALAXMI	1
9-May	5869	AMARPAL	KP	200	9209.83	GZB	BSA	1
9-May	2663	GOPAL	KP	150	6858.84	GZB	BSA	1
9-May	6028		SNK,SHIKHAR	823	27050.91	KNP	ST	1
9-May	2667	VIRESH	KUBER	124	4006.38	SONIPAT	BLUE STAR	1
10-May	2668	GOPAL	TS	200	5624.59	PATPARGANJ	TIWARI	1
10-May	6300	LALARAM	TS	100	2809.21	PATPARGANJ	BSA	1
10-May	2671	AMARPAL	TS	200	5581.55	PATPARGANJ	BSA	1
10-May	2669	SANJAY	VIMAL	100	4937.4	SONIPAT	CONVERSATION	1
10-May	2667	VIRESH	VIMAL	110	5431.14	SONIPAT	CONVERSATION	1
10-May	9520	ANIL		30	453.11	OLD DELHI	KHALID	1
10-May	6029		S.PLUS	551	26638.57	GKP	НК	1
10-May	2991		S.PLUS	483	17511.19	GKP	JYOTI	1
10-May	6033		SNK	881	27702.75	KNP	-	1
10-May	2668	GOPAL	KP	149	6774.45	LAHORO GATE	KHALID	1
10-May	499		KP KISHOR	561	19149.5	LKN	TIWARI	1
10-May	2997	AKHTAR	КР	531	22601.84	LKN	ST	1
10-May	2671	AMARPAL	RAJSHRI	203	9834.34	GZB	BSA	1
10-May	5236	HEMSINGH	TS	300	9557.97	MANESHAR	MAHALAXMI	1
10-May	6300	LALARAM	TS	100	2807.79	PATPARGANJ	BSA	1
10-May	2670	AMARPAL	TS	200	5688.34	PATPARGANJ	BSA	1
10-May	2668	GOPAL	TS	200	5670.84	PATPARGANJ	TIWARI	1
12-May	6300	LALARAM	KUBER	95	3067.18	SONIPAT	BLOKE STAR	1 4
12-May	267	ANIL		65	1665.98		TIWABI	06
12-May	2670	SANJAY	M4, MUSAFIR	154	6865.8	NARELA	BLUE STAR	10
12-May	2667	VIRESH	NEVLA	66	2060.94	SONIPAT	BLUE STAR	1
12-May	6300	LALARAM	SUDARSAN	71	2589.67	MURTHAL	TIWARI	1
12-May	2668	GOPAL	COOL LIP	194	6646.9	NATHUPURA	TIWARI	1
12-May	6038	NEMKARAN	KP, BANARASHI	788	25783.73	LKN	GUKAY	1
12-May	2998	SHAILANDRA	SNK	588	19782.58		SWASTIK	1
12-May	2671	AMARPAL	TS	200	6401.32	MANESHAR	MAHALAXMI	1
12-May	267	ANIL		29	878.26	-	BLUE STAR	1
13-May	2663	VIRESH	SITAR	173	4370.23	ALIPUR	TIWARI	1
13-May	2669 5	SONU	TS	235	and the second se	PATPARGANJ	SHRI MAHAVEER	1
13-May	2667	VIRESH	VIMAL	125	6196.64		BLUE STAR	1
13-May	2670 9	SANJAY	VIMAL	63	3110.56		BLUE STAR	1
13-May	2668	SOPAL	M4, MUSAFIR	104	4455.89	Contraction of the local division of the loc	TIWARI	1



Whereas, on perusal of page no. 231 reveals that it contains details of laminates transported by M/s BTCPL during 9th May 2021 to 13th May 2021 of various Pan Masala & Tobacco brands. Further, it is observed that on 10th May 2021, 27,702.75 Kgs of SNK brand laminate in 881 boxes was transported to Kanpur on vehicle no. 6033. Further, on scrutiny of invoices of M/s MSPL, Delhi it is seen that on 10th May 2021, two invoices bearing nos. D5D2122/1084 and D5D2122/1085 were issued showing supply of Printed Paper Aluminium Foil Laminate/Paper Laminate of Quantity of 7876.220 kgs (278 boxes) and 19826.530 kgs (603 boxes) respectively to M/s Mahalaxmi Enterprises (07AFUPJ0552P1ZU), Late Mr. Bishambhar Dass, Plot No. J-108, Mohan Garden, near R.P. Property, Uttam Nagar, Delhi, 110059, a non-existent firm. Further, in all the tax invoices the vehicle no. was mentioned as UP53 ET 6033 (vehicle owned by M/s BTCPL) and transporter was shown as M/s Radha Krishna Freight Carrier (found non-existent at the registered address). For illustration, all two invoice bearing nos. D5D2122/1084, and D5D2122/1085 dated 10.05.2021 are depicted below:

MONTAGE SALES Works: 8-26, 8 Block, Jhilmil I PAN : AAMCM9016D GBTIN : 07AAMCM9016D1ZG CIN : U51909DL2019PTC Emmil : montagesalesp8gr	1 354266 mail.com		*5		2019 40 (1994), 1994 (1994), 1996 (1996)		
Invoice No. : D5D2122/1084 Invoice Date : 10/05/2021 Reverse Charge : No	Transportation Vehicle Numb Date of Suppl	ber : dy :	By Road UP53ET-6033 10/05/2021			CK No, 1 1721	
State 1 07 - Delbi Details of Receiver / Billed	Place of Supp	ply :	07 - Delhi			ee / Shipped t	2021 10:43:00PM
Name : MAHALAXMI ENTERPRISES Address : LATE MR BISHAMBHAR DASS, PLOT NO. 3-10 GARDEN. UTTAM NAGAR, NEAR R.P. PROPER DELMI - 110059 GSTIN : 1 07A7UP30552P12U State : DolNi Purchase Order : N/A			Name Address GSTIN State Transports	DELHI - 110059 1 07AFUP30552P1 1 Delhi	MBHAR DASS, A NAGAR, NEAR	R R.P. PROPERTY	
Insurance : N/A Commodity : PTD/UN-PTD ALUMINIUM FOIL LAMINATED V	WITH PAPER		GR No. & C				
NO. NAME OF PRODUCT / SERVICE PAPER AL-FOIL LAMINATE		HSN / SAC	KGS	QUANTITY 7876.220	BOXES 278	84TE 362.000	AMOUNT (Rs. 2851191.6
		Total					2651101.6
		Total istance(in KM)	29	7876.320	276 axable Val	196	2851191.6
GST Amt, Payable (Words) Rs. Five Lakh Thirteen T Fourteen Only. Invoice Amt,(Words) : Rs. Thirty Three Lakh Sixty Ser Seventy Only. Delivery Terms: Ex Works to Party, Gross WL8315.46 EWB No : 70118960449 Dt. 10/05/2021 22:43 Valid TH IRN : a3c4bec100c7bb599f60d2b03e3a1875728d7e41bf8b	Approximate Di Thousand Two Hum Iven Thousand Seve 6 Kgs. II : 11/05/2021 23:59	istance(in KH) Idred en Hundred	. 29	Total T I.G.S. C.G.S. S.G.S. Tax Amo Round TCS 00	T. 0 9.00%		
Fourteen Only. Invoice Amil.(Words) : Rs. Thirty Three Lakh Sixty Ser Seventy Only. Delivery Terms: Ex Works to Party, Gross WL8315.46 EWB No : 701189604419 Dt. 10/05/2021 22:43 Valid Till	Approximate Di Thousand Two Hun- rven Thousand Seve 5 Kgs. Il 11/05/2021 23:59 e1a895de508f10c690 ure true & correct and ryad and that there is from the buyer. surance Policy Number please intimate near	listance(In KM) adred en Hundred 0 000b 1 the amount s no flow of er taken from est office of th		Total T I.G.S. C.G.S. S.G.S. Tax Ame Round TCS 00 Total J	Tr. 8 9.005 T. 8 9.005 T. 9 9.005 T. 9 9.005 Mont : Gar Dfr mount after NTAGE SAL		2051191.60 0.00 256607.00 513224.00 31324.00 3364.00 3367770.00

REGD. OFFICE 1 Plot No. B-16, Village Gazipur, Delhi - 1100



Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit F.No. DGGI/INV/GST/1757/2021/GRU

Works: B-26, B Block, Jhiln PAN : AAMCM9016D GSTIN : 07AAMCM9016D CIN : U51909DL20191 Emmail : montagesalesp	nil Industrial Area Eas 12G PTC354266 o@gmail.com	LIMITE at Delhi-11009	95				
Invoice No. : D5D2122/1085	Transportati	ion Mode +	By Road			ORIGINAL	FOR RECIPIENT
Invoice Date : 10/05/2021	Vehicle Num	51.07 CT	UP53ET-6033				
Reverse Charge : No	Date of Supp	ply :	10/05/2021			ACK No, : 1721	10368004308
State : 07 - Delhi	Place of Sup	ply :	07 - Delhi			ACK DT. : 5/10,	/2021 10:44:00PM
Details of Receiver / Bil	lled to.			Detail	s of Consign	nee / Shipped t	0.
Name : MAHALAXMI ENTERPRISES Address : LATE MR BISHAMBHAR DASS, PLOT NO. GARDEN, UTTAM NAGAR, NEAR R.P. PRO DELHI - 110059 SSTIN : 07AFUPJ0552P1ZU		JP30552P	Name Address GSTIN		AMBHAR DASS MM NAGAR, NEJ 59	, PLOT NO. J-108 M	
State : Delhi	State Code	0 7	State	: Delhi			State Code 0 7
Purchase Order : N/A Insurance : N/A Commodity : PTD/UN-PTD PAPER LAMINATE			GR No. & C		A KRISHNA FRI 0/05/2021	EIGHT CARRIER	
NO. NAME OF PRODUCT / SERVICE		HSN / SAC	UOM	QUANTITY	BOXES	RATE	AMOUNT (Rs.
1 PAPER LAMINATE	0.	48239018	KGS	5020.750	150	227.000	1139710.3
2 PAPER LAMINATE		48239018	KGS	1739.950		227.000	394968.7
3 PAPER LAMINATE		48239018	KGS	6006.420	nuida)	227.000	1363457.3
4 PAPER LAMINATE 5 PAPER LAMINATE		48239018	KGS	6029.430 1029.980		227.000	1368680.6
		Total	I	19826.530	603		4500622.40
	Approximate E	Distance(in KM)	: 29	Total	Taxable Va	lue	4500622.40
GST Amt. Payable (Words) : Rs. Eight Lakh Ten 1 Dnly. Invoice Amt.(Words) : Rs. Fifty Three Lakh Sixtee Delivery Terms: Ex Works to Party, Gross Wt.2065 EWB No : 741189604424 Dt. 10/05/2021 22:44 Valid	n Thousand Forty Fiv 55.13 Kgs.	e Only.		S.G.S Tax An Round TCS 8	.T. 0 9.00 .T. 0 9.00 wount : GST	8	0.00 405056.00 405056.00 810112.00 0.40 5311.00 5316045.00
IRN : dafde4635a4935ab270b238423edf5e28d0af6782							
Declaration : - Certified that the particulars given abo indicated represents the price actually additional consideration directly/ indire N 1. Any dispute is subject to Delhi Jurisdiction only O 2. This material is covered under above mentione N/A. T 3. In case of any Loss/Damage occur in any trans Insurance Company and Copy to us immediatel by the party.	charged and that there i ctly from the buyer. d insurance Policy Numb sit , please intimate near	is no flow of per taken from rest office of th	e	For M		LES PRIVATE LI	
Payment Mode - PLEASE MAKE PAYMENT BY A/C F	PAYEE CHEQUE/DEMAND	DRAFT/SWIFT	TRANSFER 1	N FAVOUR OF MO			
			- TOWNSTER D	ATUSA UP MU		intrate strateD	
PLEASE MAKE PAYMENT BY A/C F PLEASE MAKE THE PAYMENT BY A/C PAYEE CHEQUE/DE WORKS : (1) 8-26, 8 Block, Jhilmil Industrial Area East De		GS IN FAVOUR	OF MONTAGE	SALES PRIVATE I	TD.		

And whereas, all the details like date of invoice, weight/quantity, No. of boxes and vehicle no. contained in page no. 231 of file @ sl. no. 17 relating to Kanpur destination



matches with the said two tax invoices except destination and name of the consignee. Further, on physical verification of M/s Mahalaxmi Enterprises (07AFUPJ0552P1ZU), Late Mr. Bishambhar Dass, Plot No. J-108, Mohan Garden, near R.P. Property, Uttam Nagar, Delhi, 110059 the same was found to be non-existent at their Principal place of business **(RUD-121A)**.

And whereas, it is seen that E-way bill for the tax invoice had been generated which are duly reflected on the tax invoices. Further, an effort was made to track the movement of vehicle no. UP53 ET 6033 through online E-Way Bill MIS System. E-way bills issued assigning vehicle No. UP53 ET 6033 on 10.05.2021 was searched, and it was found that following two e-way bills were assigned to vehicle No. UP53 ET 6033 on 10.05.2021. On tracking the movement of vehicle No. UP53 ET 6033 on 10.05.2021 through e-way bill no. 701189604419, revealed that the said vehicle was transporting goods to Kanpur instead of destination mentioned in the tax invoice i.e., Uttam Nagar, Delhi. The following screenshots taken from the E-Way Bill MIS System shows the actual movement of vehicle.

List of Valid E-Way Bill

E-1	E- Way Bill Detail		E- Way Bill Details		Seller Place &	Buyer Place &		Assessable Value and Tax
EWB No.	EWB Date	Valid Till	Pincode	Pincode	HSN Code & Description	Value (Rs)		
741189604424	10-05-2021 22:44:00	11-05-2021 23:59:00	DELHI 110095	DELHI 110059	48239018 - OTHER PAPER, PAPERBOARD,	4500622.40 & 810112.08		
701189604419	10-05-2021 22:43:00	11-05-2021 23:59:00	DELHI 110095	DELHI 110059	76072090 - ALUMINIUM FOIL (WHETHER O	2851191.60 & 513214.50		

Details of Eway-bill

E-	Way Bill Detail	5	Dispatch From Place	Dispatch To Place		Assessable Value and Tax
EWB No.	EWB Date	Valid Till	& Pincode	& Pincode	HSN Code & Description	Value (Rs)
701189604419	10-05-2021 22:43:00	11-05-2021 00:00:00	DELHI 110095	DELHI 110059	76072090 - ALUMINIUM FOIL (WHETHER O	2851191.60 & 513214.50

Vehicles entered for the E-way bill[Part B details of only Road are considered]

Vehicle No.	Vehicle details entry date	in EWB	Next vehicle details entr	y date in EWB(if any)
UP53ET6033	UP53ET6033 10/05/2021 22:43:0		NA	C
	Toll	Details passed b	y Vehicle	
Sl no	Toll Plaza	Direction	Date/Time	State
Т1	Badarpur faridabad Toll Plaza	South	11/05/2021 01:54:21	
Т2	Srinagar Toll Plaza	West	11/05/2021 03:06:20	HARYANA
тз	Mahuvan Toll Plaza	East	11/05/2021 05:01:20	UTTAR PRADESH
T4	ALEP Main Plaza 21	East	11/05/2021 06:42:15	UTTAR PRADESH
Т5	Anantram Toll Plaza	East	11/05/2021 10:28:33	UTTAR PRADESH
Tő	Barajore toll plaza	East	11/05/2021 12:02:28	UTTAR PRADESH





3.4 Whereas, a detailed enquiry was made from Shri Sujeet Kumar Singh, owner of M/s BTCPL during his statement dated 25.06.2021 (**RUD-16**). Shri Sujeet Kumar Singh in his statement dated 25.06.2021 stated that he and his family members were directors in various companies which were engaged in different businesses. Regarding M/s BTCPL, he stated that he and his brother Shri Abhijeet Singh were directors till 2018 but after 2018 Shri Keshav Chandra Patra and Shri Madan Mohan Jena are the directors. Shri Sujeet Kumar Singh further stated that M/s BTCPL, is in the business of goods transportation which owns around 125 trucks; that M/s BTCPL, runs under his supervision and all the business decisions are taken by him. Further, during his statement dated 25.06.2021 he submitted a list of vehicles/trucks owned by M/s BTCPL, and a list of companies in which he and his brother were directors.

And whereas, Shri Sujeet Kumar Singh in his statement dated 25.06.2021, stated that he formed M/s Bharat Transport Company as his Proprietorship concern in the year 2011 for the business of goods transportation; that in the year 2017, M/s BTCPL, was formed and business of proprietorship concern was taken over by the said company; that during the year 2018, M/s BTCPL, was taken over by Shri Keshav Chandra Patra and Shri Madan Mohan Jena for Rs. 6.5 crore on the condition that responsibility of loan repayment of trucks/vehicles will be theirs; that M/s BTCPL, was sold to Shri Keshav Chandra Patra and Shri Madan Mohan Jena since they were known to him and accordingly no written agreement was signed between them; that Shri Keshav Chandra Patra and Shri Madan Mohan Jena failed to pay the agreed amount to him and neither they made timely repayments of the bank loans; that since he and his brother were guarantors of bank loans, he took back the control of M/s BTCPL, within six months and



that though Shri Keshav Chandra Patra and Shri Madan Mohan Jena are still the directors but the company is run and managed by him with full control.

And whereas, on being enquired about his dealings with M/s MEPL, Shri Sujeet Kumar Singh stated that he transports the goods i.e. printed laminates pertaining to M/s MEPL, Noida, and M/s MSPL, Delhi; that printed laminates are used for packaging of Pan Masala, Tobacco, food items, Noodles, Namkeens, Gift items etc.; that he has been transporting printed laminates for M/s MEPL, Noida since 2012 and for M/s MSPL, Delhi since October, 2019; that he does not have any written agreement with both the said companies for transportation; that he receives freight charges from M/s MEPL, Noida through cheques whereas in respect of M/s MSPL, Delhi he collects the same from consignee/customers.

And whereas, during his statement dated 25.06.2021, Shri Sujeet Kumar Singh was confronted with file @sl. no. 17 which was recovered from his residence during the search on 25.06.2021. Shri Sujeet Kumar Singh stated that file @sl. no. 17 contained the details of transportation made by his firm M/s BTCPL, during the period December 2020 to June 2021. He further explained the details mentioned in various pages as under:

	These pages contain the details of transportation between 1 st
Page No.	December 2020 to 19 th December 2020. The details reflect the date of
1 to 5	transportation, truck No., brand of laminate/goods, No. of Boxes,
	weight, destination, expenses, etc.
Page No.	These pages contain date wise expenses incurred by the staff of M/s
6 to 12	BTCPL.
	These pages also contain the date wise details of laminates transported
Page No.	to various Pan Masala manufacturers during December 2020 from
13 to 19	M/s MSPL, Delhi. The details reflect the brand of Pan Masala, weight
	of laminate and destination where laminates were transported.
Page No.	These pages reflect the date wise receipt of cash from M/s MSPL, Delhi
20 to 21	on account of transportation of laminates to Pan Masala Units.
Page No.	These pages contain the date wise expenses incurred on the vehicles in
22 to 24	the month of December 2020.
Page No.	These pages contain the date wise details of laminates transported to
25 to 26	Pan Masala units located in Kanpur.
Page No.	These pages relate to transportation in respect of M/s Rhoret Agro
27 to 40	These pages relate to transportation in respect of M/s Bharat Agro.
Page No.	These pages contain the details of solary of staff and other expanses
41 to 46	These pages contain the details of salary of staff and other expenses.

And whereas, Shri Sujeet Kumar Singh stated that similarly the details contained in pages no 47 to 251 pertain to the transportation of printed laminates during the period January 2021 to June 2021. Thus, Shri Sujeet Kumar Singh in his statement dated



25.06.2021 admitted that he was transporting printed laminates supplied by M/s MEPL, Noida, and M/s MSPL, Delhi to various Pan Masala/Tobacco manufacturers; that the recovered sheets/pages contained in file @ sl. no. 17 were maintained date-wise, vehicle-wise, brand-wise and destination-wise; that the details also reflected quantity of laminates transported and which on verification with the invoices issued by M/s MSPL, Delhi can be found tallying except that the consignee name shown were bogus (non-existent/non-operational) firms.

4. INVESTIGATION CONDUCTED AGAINST THE BOGUS FIRMS

4.1 Whereas, during the course of investigation, it had been noticed that manufacturing unit of M/s MEPL, located at Jammu, Noida, Haridwar, and Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior had issued tax invoices to various bogus (non-existent/non-operational) firms/companies. Further, the goods (*i.e.*, Printed Paper/Plastic Laminate) were clandestinely supplied to Pan Masala/Chewing Tobacco manufacturers. Further, the bogus firms/ companies to whom tax invoices were issued by M/s MEPL, M/s MSPL, M/s MFSPL, and M/s MPSPL, had fraudulently availed ITC based on those tax invoices without receipt of underlying goods. Further, on analysis of GSTR-1M returns of these bogus firms/ companies, it had been noticed that they had also passed on irregular ITC by issuing tax invoices to other firms/companies to whom tax invoices were issued by M/s MEPL and its depots were carried out to ascertain their physical existence/operational status, and to verify the legitimacy of supply shown to these firms/companies by M/s MEPL and its depots.

4.2 And whereas, the GSTIN & trade name of the firms/companies against whom investigation was initiated are mentioned hereunder along with GST involved on the tax invoices issued by M/s MEPL, Jammu, Noida, Haridwar, Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow, and M/s MPSPL, Gwalior:

A. AS PER GSTR-1M, M/S MONTAGE ENTERPRISES PVT. LTD., JAMMU (01AACCM8173H1ZM) HAD ISSUED TAX INVOICES TO THE FOLLOWING SUSPICIOUS FIRMS/COMPANIES:

		to firms/comp	volved on the inv panies as per GS' MEPL, Jammu	
		2017-18	2018-19	2019-20
1	01BIKPC6617E1ZS Globe Enterprises	3,65,50,754	-	-
2	07AAHCC6179Q1ZU Catania Enterprises Pvt. Ltd.	-	17,80,79,583	-
3	07AATFG8021G1Z8 Global Trading Co	-	-	7,67,15,834



	Total	19,51,17,596	34,55,71,158	18,73,81,785
11	Impact Traders	-	-	4,53,866
	29BMUPS2847A1ZK			0.1.1
10	G. S Trading	-	9,66,95,381	-
	07IKIPS8885M3ZQ		- ((0)	
9	Golf Traders	15,85,66,842	-	-
	07DRXPK8539K1ZP	1= 9= 66 940		
0	Vicky Trading Co	-	-	3,89,52,946
8	07CJUPM2255G1ZV			0 80 50 046
7	Harish Traders	-	-	4,60,96,699
_	07CINPP9472Q1ZZ			160.06.600
0	Singhania Enterprises	-	2,90,65,197	12,21,052
6	07BSTPS8497K2ZB		0.00 65 107	10.01.050
5	Sun Trading Company	-	4,17,30,997	36,57,841
_	07BDIPJ1111P1ZK		4 15 00 005	06 55 941
4	Nirbhay Trading Co.	-	-	2,02,83,547
	07AMRPJ1732H1ZZ			

B. As per GSTR-1M, M/s Montage Enterprises Pvt. Ltd., Haridwar (05AACCM8173H1ZE) had issued Tax Invoices to the following Suspicious Firms/Companies:

Sl. No.	GSTIN & Trade Name	Total GST involved on the invoices issued to firms/companies as per GSTR-1M of M/s MEPL, Haridwar		
		2017-18	2018-19	2019-20
1	07AAHCG0818Q2Z7 Gwalior Enterprises Pvt. Ltd.	-	7,78,42,947	-
2	07AAHCG0827H1ZQ Ghaziabad Enterprises Pvt. Ltd.	-	8,76,43,799	-
3	07ADGPT2590M2ZX Proview Traders	-	10,59,43,896	-
4	07ADNPB7822K1ZC P B Associates	58,31,170	4,13,13,893	-
5	07APVPC5712R1Z7 Genius Enterprises	11,81,15,927	-	-
6	07AWUPA7355A2ZJ M.R. Enterprises	-	7,38,61,073	1,15,16,257
7	07BDSPK7832A1ZG Ridhi Traders	-	_	71,80,311
8	07BFHPP9940K1ZS Unique Traders	-	2,07,78,691	2,37,78,898
9	07BLFPJ4916H1Z4 D K Trading Company	-	6,30,23,985	25,84,952
10	07BNJPR5077B1ZU Rai Enterprises	-	-	6,76,68,595
11	07BRCPJ0056P1ZN Om Trading Company	-	-	7,62,78,140



	07BXAPA6529A1Z3			
12	Aripha Trading Co	-	-	4,34,31,296
	07BYPPB4545K1Z4			
13	Adheera Traders	-	-	1,40,27,284
	o7CLBPM0865R2ZI			
14	Maurya Enterprises	-	8,05,17,778	-
15	07FUHPS8719A2ZB Iconic International	-	2,87,15,708	7,62,23,400
16	07GLDPS5476Q1Z0	-	-	12,59,25,338
	S.S. Trading Co.			·
17	07HWVPS6195C1ZM	-	11,74,27,561	2,42,92,433
	Suraj Enterprises			
18	08AAKPQ9466A1ZD	4,68,51,812	-	-
	Basic Traders Rajasthan	1, ,,, ,		
19	08AJVPA9330R1ZD	6,18,79,262	-	-
	Zodiac Traders	, ,,,,,		
20	08AOGPK6533E2ZZ	11,24,62,366	1,65,20,272	_
	Imra Sales Rajasthan	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, - 0, - , ,	
21	09AAHCG0818Q1Z4	4,57,22,629	17,71,04,958	_
	Gwalior Enterprises Pvt. Ltd.	4,07,-=,0=)	-/,/-,0-,/,00	
22	09AAHCG0827H1ZM	-	5,75,08,151	_
	Ghaziabad Enterprises Pvt. Ltd.		5,75,000,151	
23	09AOZPY6635A1Z6	5,21,67,543	_	_
-3	M.K. Trading Co.	5,=1,0/,515		
24	09BSPPG9767A1ZA	-	21,48,335	_
	Rajeev Trading Co.			
25	09BUTPS6855F1ZP	-	1,14,72,626	_
-3	Avtar Trading Co.		1,14,72,020	
26	09BXNPA3450K1ZB	2,17,08,856	_	_
20	S.A. Enterprises	2,1/,00,050		
27	09GUGPS2927N1ZR	6,94,75,990	_	_
2/	R.S. Enterprises	0,94,75,990		_
28	09HAIPS2009Q1ZY	36,91,397	3,00,990	
20	Manish Enterprises	30,91,39/	3,00,990	_
20	18AALCM8399L1ZD	_	00 67 714	43,28,393
29	Mantova Enterprises Pvt. Ltd.	-	33,67,714	43,20,393
	18AALCM8855D1Z1			04.00.700
30	Manchester Enterprises Pvt. Ltd.	-	-	24,03,739
A 4	21AAKPQ9466A1ZP	90 OF 944		
31	Basic Traders	82,05,844	-	-
00	21AOGPK6533E2ZB	00.14.010		
32	Polymart Traders	29,14,910	-	-
	22ADBPT8598E1Z8		0 50 101	
33	Bhagyashree Sales	-	2,70,191	-
<u> </u>	22BTDPJ4048N1ZM			0.40.00=
34	Raipur Sales	-	-	2,19,927
a –	22BXDPG5417J1ZQ			
35	Astha Traders	-	-	11,73,129
L				



36	23EHFPP8744G1Z2	-	2,20,53,213	-
	J M D Trading Co.			
37	23HRAPS7815D1ZS P S Corporation	8,12,44,078	23,57,659	-
	24ATUPD1928M1ZB			
38	Alfa Enterprises	-	2,01,34,627	-
	24DKHPM5514D1ZF			
39	S M Traders	14,56,91,384	1,96,17,103	-
	29ABPPZ7252H1ZR			
40	Elegant Traders	2,98,874	-	-
41	29BMUPS2847A1ZK	1.07.04.001	06 61 906	
41	Impact Traders	1,07,34,091	26,61,896	-
42	29CMQPP6968Q1ZF	39,69,087	4,22,921	
44	A M Traders	39,09,007	4,22,921	
43	36BGUPA2323M1Z8	32,77,815	24,53,323	86,86,067
40	Crystal Traders	52,77,015	-+,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	00,00,007
44	36BPAPA5534D1ZH	9,54,419	_	_
	MAZ Traders	7,04,4-9		
	Total	79,51,97,454	103,54,63,310	48,97,18,159

C. AS PER GSTR-1M, M/S MONTAGE ENTERPRISES PVT. LTD., NOIDA (09AACCM8173H1Z6) HAD ISSUED TAX INVOICES TO THE FOLLOWING SUSPICIOUS FIRMS/COMPANIES:

Sl. No.	GSTIN & Trade Name		volved on the inv panies as per GS MEPL, Noida	
		2017-18	2018-19	2019-20
1	07AALCM8399L1ZG		2,38,33,957	_
1	Mantova Enterprises Pvt. Ltd.		2,30,33,93/	_
2	07ADGPT2590M2ZX		6,84,30,496	_
2	Proview Traders	-	0,04,30,490	-
9	07ADNPB7822K1ZC	2 02 50 810	2,86,95,793	_
3	P B Associates	2,92,59,810	2,00,95,/93	-
4	07AQOPH9721P1Z2	60 45 150		
4	Arya Trading	62,45,159	-	-
_	07ASCPL1721F1Z7		10,84,43,221	17 44 441
5	Sanjay Trading Co.		10,04,43,221	17,44,441
6	07AXHPK0562F1ZO			7,28,06,064
U	Gupta Enterprises	_	_	/,20,00,004
7	07AZCPN6735E1ZD	_	_	2,28,95,310
/	Nafeesh Trading Co.		_	2,20,95,510
8	07BDSPK7832A1ZG		2 02 00 E20	
0	Ridhi Traders		2,92,99,520	
9	07BGRPS1887H1ZM			2 24 71 067
9	Mayo Enterprises		-	3,24,71,967
10	07BJRPN7668C1ZN		1 01 02 020	
10	P.C. Supplier Co.	-	1,01,03,020	-



	07CAUPR4187F1Z0			
11	Alston Traders	-	2,37,67,205	-
	07DBLPK9034D2ZK			
12	Gyan Traders	2,01,08,960	-	-
	07EATPK4367M1ZT			
13	, 10 ,	1,62,30,305	-	-
	M K Enterprises			
14	07EFEPK0237Q1Z5	-	-	1,79,19,170
	Kumar Enterprises			
15	07EZRPM5505G1Z1	-	-	1,25,61,716
	Mau Traders			
16	07FUHPS8719A2ZB	-	4,03,91,043	7,31,07,969
	Iconic International		1, 0,,, 10	
17	08AAKPQ9466A1ZD	15,04,749	2,34,529	-
,	Basic Traders Rajasthan	0/- 1// 1/	,01,0 7	
18	08AJVPA9330R1ZD	22,51,804	-	_
	Zodiac Traders	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
19	08AOGPK6533E2ZZ	30,67,499	17,18,832	6,58,624
	Imra Sales Rajasthan	0-,-,-,79	_/,.20,00	-,00,0-7
20	09AALCM8399L1ZC	_	6,15,61,454	_
	Mantova Enterprises Pvt. Ltd.		-,-0,-+,-0+	
21	09AILPC7741F2Z6	1,39,17,979	3,41,51,033	-
	M K Trading Co.	-,59,-7,979	5,1,5,0,5,0,5	
22	09BFTPT4792K1Z8	66,74,818	_	-
	Tripathi Enterprises	00,74,010		
23	09BPTPB6759L2ZZ	14,42,48,890	_	_
-3	S K Trading Company	14,42,40,090		
24	09CBIPA0305H1Z7	_	3,01,62,287	_
-4	Govind Enterprises		5,01,02,207	
25	09DJQPK5086N1Z6	3,17,58,248	_	_
2 3	K.M. Trading Co.	3,1/,30,240	_	
26	09ETKPS6789F1ZO		_	E1 01 E74
20	Surya Trading Company	-	-	51,01,574
97	09GXUPS5402R1Z7		68,66,055	
27	Nisha Sales	-	00,00,055	-
28	09HAIPS2009Q1ZY	1.01.00.000	4.05.055	
20	Manish Enterprises	1,01,02,029	4,95,057	-
90	18AALCM8399L1ZD		05 01 566	10.01.000
29	Mantova Enterprises Pvt. Ltd.	-	25,21,766	10,31,938
	18AALCM8855D1Z1			10 50 90 4
30	Manchester Enterprises Pvt. Ltd.	-		19,53,894
0.4	19ARFPM0150K1ZS		04 55 550	0.64.090
31	Mas Sales Corporation	-	34,75,752	2,64,983
	20AAGFI6942P1Z2		0.04.077	
32	Impex Global	2,27,485	2,04,075	-
	21AOGPK6533E2ZB			
33	Polymart Traders	-	11,55,087	-
	22ADBPT8598E1Z8		0	
34	Bhagyashree Sales	-	87,55,334	-
L	57			



	22BTDPJ4048N1ZM			
35	Raipur Sales	-	-	5,29,459
	23ADWPT8362K1ZM		1 00 101	
36	Simran Trading	-	1,08,121	-
07	23AVVPG2313G1ZT	8,28,726		
37	Gaurav Corporation	0,20,/20	-	-
38	23BXDPG5417J1ZO	_	57,87,090	1,59,16,382
30	Ashta Traders	-	5/,8/,090	1,59,10,302
39	23EHFPP8744G1Z2	_	1 40 51 404	_
39	J M D Trading Co.	-	1,49,51,494	_
40	23HRAPS7815D1ZS	10 51 550		_
40	P S Corporation	19,51,559	17,14,543	_
41	24ATUPD1928M1ZB		3,16,23,230	1,89,06,714
41	Alfa Enterprises		3,10,23,230	1,09,00,/14
42	24DKHPM5514D1ZF	3,08,06,836	1,34,60,300	_
4-	S M Traders	3,00,00,030	1,34,00,300	
43	29ABPPZ7252H1ZR	95,81,075	_	_
43	Elegant Traders	95,01,075		
44	29BMUPS2847A1ZK	28,10,554	5,69,17,448	3,69,78,581
44	Impact Traders	20,10,004	5,09,1/,440	3,09,70,301
45	29BVSPA2131G1ZP	_	1,34,71,399	_
40	Multilayer Traders		1,04,/1,099	
46	29CMQPP6968Q1ZF	70,35,330	57,86,853	_
4~	A M Traders	/ 0,00,000	5/,00,055	
47	36BGUPA2323M1Z8	32,73,442	32,095	39,346
4/	Crystal Traders	J ² ,/J, 4 4 ²	52,095	37,340
48	36BPAPA5534D1ZH	22,88,791	-	_
40	MAZ Traders			
	Total	34,41,74,048	62,81,18,809	31,48,88,132

D. AS PER GSTR-1M, M/S MONTAGE ENTERPRISES PVT. LTD., MALANPUR (23AACCM8173H1ZG) HAD ISSUED TAX INVOICES TO THE FOLLOWING SUSPICIOUS FIRMS/COMPANIES:

Sl. No.	GSTIN & Trade Name	N & Trade Name Total GST involved on the invoices iss MEPL, Malanpur		FR-1M of M/s
		2017-18	2018-19	2019-20
1	07AAHCB5448H1ZK BPSR Industries Pvt. Ltd.	-	4,57,85,966	-
2	07ADGPT2590M2ZX Proview Traders	-	1,14,24,537	1,79,17,491
3	07ADNPB7822K1ZC P B Associates	66,54,686	2,61,924	-
4	07AILPC7741F1ZB Gravity Enterprises	6,96,17,461	-	_
5	07BDSPK7832A1ZG Ridhi Traders	-	-	12,38,262



6	07BFHPP9940K1ZS	_	33,37,102	42,68,995
	Unique Traders		33,37,-0-	4=,000,773
7	07BGRPS1887H1ZM	_	_	24,87,600
	Mayo Enterprises			,;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;
8	07BPNPN0572H1ZO	_	_	1,48,97,796
Ľ	R.N. Trading Co			-,
9	07BUTPS6855F1ZT	_	26,16,847	-
9	Avtar Trading Company		20,10,047	
10	07BUXPP4783K1ZI	_	4,19,00,173	19,91,650
10	Pal Trading Co		4,19,00,1/5	19,91,030
11	07DBFPK8046H1ZH	_	_	56,40,844
	Ram Enterprises			50,40,044
12	07FERPS7038C1Z1	_	_	95,61,812
14	A S Sales			95,01,012
13	07FUHPS8719A2ZB	_	1,22,70,635	1,96,12,026
	Iconic International		-,,/0,030	1,90,12,020
14	08AAKPQ9466A1ZD	5,16,015	97,813	_
	Basic Traders Rajasthan	3,10,013	97,013	
15	08AOGPK6533E2ZZ	_	20,16,310	2,08,909
-0	Imra Sales Rajasthan		20,10,010	2,00,909
16	09AAHCB5448H1ZG	2,63,68,806	5,07,60,024	-
	BPSR Industries Pvt. Ltd.	_,0,000	5,07,00,024	
17	09AOZPY6635A1Z6	1,35,50,961	_	-
	M.K. Trading Co.	-,00,00,701		
18	09BFTPT4792K1Z8	3,20,55,473	_	-
	Tripathi Enterprises	0,-0,00,7/0		
19	09BPTPB6759L2ZZ	1,48,00,951	_	-
	S K Trading Company	-,,+0,00,,)01		
20	09BSPPG9767A1ZA	_	38,42,137	-
	Rajeev Trading Co.		50,4-,-57	
21	09BXNPA3450K1ZB	4,32,43,541	_	_
	S.A. Enterprises	1,0-,10,01-		
22	09CBIPA0305H1Z7	_	3,09,98,384	_
	Govind Enterprises		0,- ,,,-,0-1	
23	09DMHPK7624A1Z4	2,76,29,741	_	_
	G.S. Trading Co.	-,, -,-,,,,,,		
24	09DWWPS0227J1ZT	3,29,32,603	_	-
	P.C. Supplier Co.	0, ,,0-,0		
25	09GXUPS5402R1Z7	_	58,38,925	-
	Nisha Sales		0 10 - 77 -0	
26	09HAIPS2009Q1ZY	2,93,48,279	18,45,947	-
_	Manish Enterprises	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, 10, , 17	
27	18AALCM8399L1ZD	_	2,92,13,553	12,62,920
, '	Mantova Enterprises Pvt. Ltd.		,, , 0,000	, ,, -
28	18AALCM8855D1Z1	_	_	2,31,61,499
	Manchester Enterprises Pvt. Ltd.			,5 ,- ,177
29	19ARFPM0150K1ZS	_	7,79,411	4,02,019
	Mas Sales Corporation			· · · ·



	Total	41,83,79,604	53,40,39,984	28,68,51,945
48	36BPAPA5534D1ZH MAZ Traders	14,78,696	-	-
47	36BGUPA2323M1Z8 Crystal Traders	1,04,217	38,48,496	1,07,68,285
46	29CMQPP6968Q1ZF A M Traders	59,24,253	15,73,441	12,13,731
45	29BVSPA2131G1ZP Multilayer Traders	-	50,49,890	75,65,390
44	29BMUPS2847A1ZK Impact Traders	11,75,481	5,19,558	-
43	29ABPPZ7252H1ZR Elegant Traders	33,28,474	1,12,73,788	-
42	24ATUPD1928M1ZB Alfa Enterprises	-	7,46,40,532	5,96,77,586
41	23HRAPS7815D1ZS P S Corporation	8,00,79,909	2,48,88,221	-
40	23EHFPP8744G1Z2 J M D Trading Co.	-	5,67,21,984	-
39	23BXDPG5417J1ZO Ashta Traders	-	3,78,001	2,08,04,690
38	23AVVPG2313G1ZT Gaurav Corporation	1,54,38,826	-	-
3 7	23ADWPT8362K1ZM Simran Trading	-	4,25,66,324	-
36	23ABVPO1550F2ZM Asha Industries	-	8,25,839	-
35	22IVTPS1390K1ZT R.B. Enterprises	-	1,14,94,011	-
34	22BXDPG5417J1ZQ Astha Traders	-	2,22,23,349	2,54,24,219
33	22BTDPJ4048N1ZM Raipur Sales	-	-	5,63,52,644
32	22ADBPT8598E1Z8 Bhagyashree Sales	-	2,41,93,325	14,83,161
31	21AOGPK6533E2ZB Polymart Traders	12,01,821	1,01,12,709	9,10,416
30	21AAKPQ9466A1ZP Basic Traders	1,29,29,410	7,40,828	-

E. AS PER GSTR-1M, M/S MONTAGE SALES PVT. LTD., DELHI (07AAMCM9016D1ZG) HAD ISSUED TAX INVOICES TO THE FOLLOWING SUSPICIOUS FIRMS/COMPANIES:

Sl. No.	GSTIN & Trade Name	Total GST involved on the invoices issued to firms/companies as per GSTR-1M of M/s MSPL, Delhi			
NU.		2019-20	2020-21	2021-22	2022-23
1	06AWRPM0914E1ZM Osis International	-	42,92,282	-	-



	06BWYPV1916P1ZE				
2	Jai Bhawani Traders	-	-	57,51,500	-
	06FACPK6158L1ZC				
3	United International	-	28,19,304	-	-
	06IQSPS7194P1ZA				
4	Ganapati Enterprises	-	1,68,71,751	-	-
_	07AAEPK3770F2ZT Shri Mahaveer Ji Sales			1 00 0(001	
5		-	1,55,99,225	1,90,06,221	-
	Corporation				
6	07AAGFU2991L1ZL	-	7,41,613	-	-
	Urbaan Trade Industries				
7	07AAIFE1973E1ZI	-	5,53,340	-	-
	Elfaed Industries				
8	07AAIFL7295E1Z0	-	-	1,37,52,119	58,34,478
	Life Wellness				0,01,1
	07AAMCA0840R1Z9				
9	Arranger Tradelinks (India)	-	1,85,87,443	82,06,500	-
	Pvt. Ltd				
10	07AAOPG0924D1Z2	_	_	80,62,131	-
	Avi Foil Traders				
11	07AAUPQ6586B3Z2	_	_	1,07,13,146	_
	Swastik Enterprises			-,-,-,-	
13	07ABAFR7758R1Z9	_	99,52,070	-	-
-0	Radical Corporation		99,5=,070		
14	07ACTPI0807Q1Z2	_	_	89,93,387	_
	Surya Enterprises			09,93,307	
15	07AEAFS4741N1ZP	_	_	1,51,99,727	_
-0	S.G. Enterprises			1,01,99,727	
17	07AFUPJ0552P1ZU	_	_	3,62,49,177	_
-/	Mahalaxmi Enterprises			3,02,49,1//	
18	07AHGPR4479K1ZO	_	_	7,68,578	_
10	Katyayni Enterprises			/,00,5/0	
19	07AHKPH3924R1ZS		_	1,19,16,424	_
19	Aavesh Enterprises		_	1,19,10,424	_
20	07AKLPJ5035D1ZD		_	0 01 10 400	
20	Blue Star	_	-	2,31,13,403	-
0.1	07ALGPU1224R2ZK			1 14 79 605	
21	Aggarwal Traders	-	-	1,14,73,605	27,13,552
	07ALMPU0109M1ZR			0 60 10 50 1	
22	S S Traders	-	-	3,60,10,534	-
	07ANCPY3290M1ZD			1 16 00 415	
23	Yadav Enterprises	-	-	1,16,39,415	-
	07ANUPH4951N1Z8			61 45 940	
24	Mehul Enterprises	-	-	61,45,840	-
	07ANYPR8387E1ZZ				
25	S. V. Enterprises	-	-	3,66,372	-
	07AOCPK8764K1ZG		0 - 00(00.00 =0.5	
26	Kumar Enterprises	-	37,57,206	93,32,732	-
L	· ·	1			



	07AOKPK9451R2ZZ				
2 7	Jajoria Enterprise	-	-	1,23,42,302	-
	07ASCPN4947P1Z2				
28	Neelima Enterprises	-	-	43,74,231	-
	07ASQPR5114G1ZI				
29	P.R. Traders	-	-	1,54,38,301	-
	07ATWPM4771H1Z0				
30	Galaxy Impex	-	-	64,10,888	-
	07AUKPD2924N1ZF				
31	Sunil S Traders	-	-	1,27,84,102	-
	07AUOPK8454G1Z6				
32	Image India	-	-	35,31,389	27,50,418
	07AXUPV6358F1ZM				
33	Sky International	-	-	1,25,17,097	72,40,769
	07AYCPT3547R2ZL				
34	Tyagi Traders	-	-	1,11,81,320	-
	07AYQPT5265L2ZG				
35	ST Traders	-	-	2,28,92,645	-
	07AZVPR2782C1ZV				
36	Das Enterprises	-	-	57,09,483	1,51,72,109
	07BBVPH7773J1ZT			40 60 001	
37	Vishal Enterprises	-	-	40,60,391	-
38	07BDNPS7160Q1ZJ	1,16,19,983	5,28,77,053	_	_
30	Ajay Trading Co	1,10,19,903	5,20,//,053	-	-
39	07BDPPD1016E1Z2	_	_	65,61,894	_
39	Renu Enterprises			03,01,094	
40	07BDSPK7832A2ZF	_	_	1,28,81,776	_
T °	Ragni Enterprises			-,,_,,,,,,,,	
41	07BETPY0156F2Z1	_	_	1,18,27,944	71,67,046
•	Kapur Enterprises			, -, ,,,,,,,	, , , , , , - 1 -
42	07BFHPP9940K2ZR	_	3,31,08,151	-	-
-	Esprit Enterprises				
43	07BFKPG9015D1ZN	-	-	1,47,19,344	44,29,972
	Acrosys Tech				
44	07BGKPM8680D1Z2	_	1,25,38,740	-	-
	Convergent Alliance				
45	07BGRPS1887H2ZL Virago Enterprises	-	-	2,00,82,169	-
	07BIWPR8811F1ZN				
46	Azad Trading	3,05,06,946	82,664	-	-
	07BJOPH4621J1Z2				
47	Hari Sales Corporation	-	-	1,45,78,610	-
	07BJVPK8809G1ZL				
48	Winjet Industries	-	1,50,45,271	-	-
	07BLVPP6162R1ZV				
49	Subrat Trading Company	1,10,86,097	6,34,92,545	-	-
	07BLZPT9351G1Z5				
50	Tiwari Trading Company	-	-	2,39,99,000	-
	international company				



	07BMVPB3838H1ZR				
51	Ganpati Enterprises	-	-	1,44,94,966	-
-0	07BNOPG2623R1ZH		0.09 50 450		
52	Vikas Trading Company	-	3,08,59,450	-	-
-0	07BRDPR1489K1Z9			1 11 97 007	
53	Raghav Traders	-	-	1,11,87,927	-
	07BTTPK2984C1ZB			1 45 05 5 40	
54	Barfani Traders	-	-	1,47,35,743	-
	07BULPK5077P1ZS			67,78,720	
55	Mahalaxmi Fabrics	-	-	0/,/8,/20	-
-6	07BUXPR3104A1ZO	6 00 51 700	22 00 225		
56	Rajesh Packaging Materials	6,29,51,792	33,09,225	-	-
	07BVSPC0480N1Z6			82,86,337	
57	Choudhari Traders	-	-	02,00,33/	-
58	07BXQPN0974E1Z5		7,73,62,814		
- 30	Pitambar Packaging		/,/3,02,014	_	
59	07BYLPB0493C1ZQ	3,04,55,579	6,22,214		
59	Pramod Traders	3,04,00,079	0,22,214	_	_
60	07BYUPA7776E1ZY	_	_	1,46,09,263	-
00	Maruti Trading Company			1,40,09,203	
61	07BYXPK7566D2ZQ	_	_	85,86,167	26,32,471
•	Unique Traders			03,00,107	20,32,4/1
62	07BZNPJ1724R1ZR	_	-	1,36,48,655	-
	Swastik Enterprises			1,00,70,000	
63	07CBGPT7205K1ZA	_	_	72,28,022	19,09,328
°J	Tradezone Enterprises			/=,=0,0==	19,09,0=0
64	07CBHPR7202R1Z0	_	3,46,78,667	-	-
~-	Sameer Trading Company		3,40,70,0007		
65	07CDCPK2241L2ZM	_	_	4,60,19,601	-
•0	H K Enterprises			4,00,2,0,002	
66	07CEXPV6488L1Z0	_	_	2,05,46,777	35,00,250
	Shayam Impex			_,-0,1-,///	00,,-0-
67	07CFAPT7827M1ZS	_	_	57,64,432	71,82,001
	Jai Bhawani Traders			57,504,404	/1,01,001
68	07CGJPD1778B1ZM	_	_	1,08,46,624	_
	Mehul Enterprises)) -) -−T	
69	07CGLPN7896N3Z4	_	1,50,44,265	2,55,30,479	_
	Niraj Enterprises		,o , i i , · · o	,00,0-,17,7	
70	07CICPC2115G1ZY	_	_	41,20,463	-
, -	Durga Enterprises			1, -,1-0	
71	07CLMPP0929C1Z3	3,04,93,808	5,25,113	-	-
	Satyanarayan Traders				
72	07COQPP0478H1ZF	3,04,95,820	-	-	-
	Gokul Enterprises				
73	07CUMPP6915P1ZO	_	-	79,90,213	-
	Ganapati Enterprises			, , , , , , 0	
74	07DDTPK9495L2ZA	_	2,74,75,626	-	-
<i>.</i>	Kavita Industries				



	07DFRPM5804P1ZM				
75	A M Enterprises	-	-	1,26,24,442	16,43,715
	07DFZPG1472M1ZQ				
76	Gupta Traders	-	-	42,68,481	-
	07DHOPP9901H1ZT				
77	Dinesh Enterprises	-	-	47,10,410	-
	07DHRPR6682G1ZI				
78	Mahaveer Industries	-	-	73,32,944	-
	07DIOPP3069P1ZA				
79	Sitakant Trading	-	3,21,10,288	-	-
	07DLXPG8767F1ZA				
80	Gita Enterprises	-	-	1,19,26,275	-
	07DOOPA4777P2Z3				
81	Gupta Enterprises	-	-	1,25,59,759	35,31,534
	07DOOPG0973R1Z4				
82	Gupta Enterprises	-	-	1,48,71,508	-
	07DOPPR4508E1ZO				
83	Subham Warpers	2,12,40,397	6,41,79,265	-	-
	07DRBPK8521B2Z3				
85	Kumar Enterprises	-	86,00,836	26,97,452	-
	07DSUPA3132C1Z2				
86	Universal Traders	-	-	2,06,99,001	33,13,791
0	07DVRPK7541H1Z2		06		
87	Jagdamba Enterprises	-	86,43,407	-	-
00	07DXHPS1755R1ZJ			9= 0= 109	
88	Singh Enterprises	-	-	87,37,108	-
90	07EFTPR2472K1ZM	0 60 10 50 4	0.49.09.06=		
89	Rajkishore Trading	3,69,13,534	3,48,28,965	-	-
0.0	07EFZPS6397G1Z8			0 60 905	1 5 4 00 7
90	Sharma Enterprises	-	-	3,62,825	1,54,937
91	07EHSPP9216E1ZU	3,04,83,872			
91	Pradhan Trading Co	3,04,03,072	-		_
92	07EKFPS8144Q1Z7	_	_	3,49,47,286	_
92	BSA Industries			5,49,47,200	
93	07EUIPP4391D1ZD	_	_	1,41,98,049	-
90	Shiv Shakti Enterprises			1,41,90,049	
94	07EULPS3748N1ZN	_	_	2,00,27,528	44,40,627
74	Rajasthan Udyog				++;+0;0=/
95	07EUXPK1745P1ZM	_	1,43,02,841	11,89,596	-
	JK Trading Co		-,-,0,0-,0+-	11,0 9,090	
96	07EWAPS6954P1ZK	_	1,19,21,907	2,94,40,183	_
	Jyoti Traders		1 11 11 - 1	///////////////////////////////////////	
97	07EWAPS6954P3ZI	_	_	1,29,15,736	-
	Soham Marketing			, ,, 0,,0*	
98	07EXWPS6748Q1ZU	_	-	2,01,34,230	23,87,161
-	Concept				
99	07EYTPR0862L1ZJ	_	-	1,07,21,489	77,44,168
	Starnx Enterprises				



	07FEZPS1061B1Z8				
100	Surya Enterprises	-	-	1,45,96,126	-
	07FFZPS9040K3ZA				
101	Shree Jee Traders	-	2,72,48,484	51,96,285	-
100	07FIFPK1036L1Z7		1 59 41 050	14.05.001	
102	KC Laminates	-	1,78,41,950	14,07,991	-
100	07FIQPK9390J1ZB			10 19 070	
103	Mahadev Enterprises	-	-	13,18,373	-
10.4	07FOZPP2803G1ZG			50.04.541	
104	Pandit Traders	-	-	59,94,541	-
105	07FRMPR1240D1ZU	_	_	60,91,655	1,79,18,187
105	Pandit Traders	-	-	00,91,055	1,/9,10,10/
106	07FUMPM7409E1ZC			1,48,51,599	
100	Shine International	-	-	1,40,51,599	
107	07FUWPS2084H1ZT			67,89,178	
107	Ashoka Industry	_		0/,09,1/0	-
108	07FXVPM4565H1ZO			2,30,35,903	59,17,962
100	Vishnu Traders		_	2,30,33,903	59,1/,902
109	07GPTPP4897E1ZX	_	_	86,14,517	1,40,66,936
109	J P Enterprises			00,14,01/	1,40,00,930
110	07GWEPK9683R1ZA	_	_	1,17,45,161	-
110	Lalit Enterprises			1,1/,40,101	
111	07HDEPD4213G1ZY	_	_	1,41,57,039	-
	Singh International			1,41,0/,009	
112	07HDSPK6418J1ZV	_	_	2,14,71,836	-
114	Krishna Traders			2,14,/1,030	
113	07HGSPK6058R1Z5	3,95,63,215	62,27,687	_	-
0	Kailash Enterprises	3,93,03,=13	02,2/,00/		
114	07HINPK9189N1ZZ	_	_	1,44,18,124	83,54,109
	Seaborne Creations			-,	0,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
115	07HJCPD2205L1ZG	_	_	13,75,918	28,59,324
0	Shiv International			-0,70,7-0	
116	07HJJPS0550Q1ZG	2,50,26,147	4,23,54,313	_	-
	Prasad Enterprises	, , , , , , , , , , , , , , , , , , ,	17 070 170 0		
	07HKJPS1195G1ZO				
117	Shree Shyam Trading	-	5,31,13,856	-	35,31,055
	Company				
118	07ICLPK7543H1Z4	_	_	33,39,608	-
	Shree Ji Enterprises			00,077	
119	07IQCPS2541L4ZC	_	_	1,03,97,584	-
	Gee Key Sales			, 0,,,,0 1	
120	07IUPPK3177P1ZK	-	-	1,85,30,778	1,43,95,810
	Rudra Enterprises			, ,,,,,,,,,	
121	07IVWPK9323M1ZH	65,47,693	3,49,93,922	_	-
	Ravi Kumar Laminates				
122	07IWOPS8094E1ZM	14,67,272	6,46,113	_	-
l	Empire Traders				



	07JECPK2475G1ZD				
123	Vikas Traders	-	-	46,55,016	-
	07JKVPS7810G1ZC				
124	K.N. Traders	-	-	1,63,61,521	-
	07JVRPK7522Q1ZG				
125	Shiv Sales	-	-	66,22,196	-
	07KLOPS9373D1Z8				
126	Phonix Traders	-	4,63,06,258	1,67,91,455	-
	07KUSPK7859B1ZV				
127	Jay Trading Co	-	-	1,52,16,751	-
109	07KXYPK9568J1Z0			1 49 96 599	
128	Satyam Enterprises	-	-	1,48,36,728	-
120	07LEGPK5418H1Z8	_	_	2 05 47 628	65 75 497
129	Singh Enterprises	-	-	2,05,47,638	65,75,427
130	07LEGPK5425N1ZW	_	_	1,92,97,036	42,83,646
-00	Micro Traders			1,7-,9/,030	42,00,040
131	07LLYPS5428N1ZO	_	3,96,90,248	20,87,731	_
-01	Kumar Trading Company		0,90,90,240	_0,0/,/01	
132	07LVWPS1348M1ZD	_	_	20,53,398	-
	Shivanju Traders			,00,0,7	
133	07NDAPS2698L1ZL	_	-	78,70,642	-
	Singh Traders			· · · ·	
134	07OHZPS8032L1ZZ Salasar Enterprises	-	-	1,47,21,951	-
	o7OIBPS3345R1ZA				
135	Nitin Trading House	-	-	63,89,569	-
	070PNPS8612L1ZS				
136	Gupta Enterprises	-	-	96,83,422	33,37,712
	07OWUPS4414J1ZJ				
137	Saraswati Enterprises	-	-	23,61,302	32,77,364
	08AMFPB9365E1Z2				
138	Ravi Kumar Suppliers	-	1,31,95,299	-	-
	09AZOPB7727N1ZO				
139	Manoj Laminates	-	1,19,10,618	-	-
1.00	09BTDPM7832B1ZQ				
140	Unique Services	-	1,90,91,537	-	-
1.4.1	09CECPK3695F1ZA		2,32,60,316		
141	Anurag Sales	-	2,32,00,310	-	-
142	09COXPK7095E1Z4	_	1,02,41,459		_
146	Singha Enterprises	_	1,02,41,439	_	_
143	18AJUPU0082F1ZR	29,78,825	2,08,75,679	_	_
-40	Kamakhya Trading Co	23,/0,023	2,00,70,079		
144	18FCMPK4971D1Z9	_	95,45,345	2,26,87,118	_
	Khalid Traders			_,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
145	23ELVPK9548F1ZG	_	47,50,588	_	-
	Kumar Traders		17,02,020		
146	24DHLPG1949H1Z9	_	_	15,61,491	-
• -	Shri Bala Ji Traders			0/ ///-	



147	24DWEPM6328E1ZM Aakar Trading Syndicate	1,27,983	87,53,656	20,80,242	-
148	27AHHPT2260P1ZQ D.K. Enterprises	-	9,89,257	47,54,671	-
149	36AAQPZ7304Q1ZL S9 Trading Co	32,83,828	43,08,359	-	-
150	36BHEPT2410B1ZU Surya Enterprises	-	1,36,08,390	1,84,53,862	-
	Total	37,52,42,791	102,37,36,875	130,96,98,344	16,82,65,859

F. AS PER GSTR-1M, MONTAGE FLEXIPACK SALES PVT. LTD., LUCKNOW (09AAMCM9015A1ZJ) HAD ISSUED TAX INVOICES TO THE FOLLOWING SUSPICIOUS FIRMS/COMPANIES:

Sl. No.	GSTIN & Trade Name	Total GST involved on the invoices issued to firms/companies as per GSTR-1M of M/s MFSPL, Lucknow		
		2019-20	2020-21	
1	09AGCPC4247K1ZF Chauhan Traders	-	5,11,69,924	
2	09AIAPN1026D1ZT Nayak Trading Company	4,41,02,674	-	
3	09AJRPP5579P1ZT Shiva Enterprises	_	5,22,04,861	
4	09ANOPN1634L1ZI KC Laminates	4,15,65,402	-	
5	09ARMPJ4078Q1ZU Chandan Trading Company	3,02,98,313	2,32,15,057	
6	09AVKPN6952D1Z8 Rabindra Laminates	3,62,81,441	-	
7	09BDOPP0550N1ZZ Vijay Sales	_	1,65,16,717	
8	09BKYPD3812J1ZR Lavanya Trading Co	_	5,65,31,618	
9	09BNIPV2084B1ZU S.V. Traders	-	35,97,031	
10	09CJBPB4851J1Z8 Tushar Laminates Sales	-	3,53,67,905	
11	09COMPA0461D1ZB Vikram Sales	-	4,56,32,848	
12	09CVFPR9246F1Z2 Ripu Trading Company	2,79,70,364	3,60,78,602	
13	09DDRPG1575H1Z5 Dev Warapers	4,37,71,456	32,059	
14	09DHFPD7637M1ZU Naresh Sales	_	4,55,59,739	
15	09DLHPR6532R1Z3 Kritika Trading Co		5,18,53,937	



16	09EAVPB1764H1ZC		
16	Sagar Trading Company	4,56,76,582	-
17	09EFZPK0434N1ZN		E E2 01 022
1/	Prashant Trading Company		5,53,91,033
18	09ERSPB1888L1ZY	4,04,86,800	_
10	Prashanta Laminates	4,04,00,000	_
19	09EXHPP4251A1ZJ	9 55 91 119	81,66,702
19	Tanya Trading Company	3,55,21,112	01,00,702
20	09FCQPD3880Q1ZM		1,82,66,596
20	Shivam Enterprises		1,02,00,590
21	09HELPK0210L1ZE		3,86,90,780
21	Navnirman Traders	-	3,80,90,780
22	09HMDPK2928B1Z5		28,65,398
22	Rohit Enterprises	-	20,05,390
	09KJKPK2903P1ZH		1,41,89,479
23	Shravan Packesing		1,41,09,4/9
0.4	18AJUPU0082F1ZR	0 40 06 150	4 40 50 067
24	Kamakhya Trading Co	2,49,36,150	4,49,59,967
0.5	18FCMPK4971D1Z9		0.08.05.075
25	Khalid Traders	-	2,08,95,075
	Total	37,06,10,294	62,11,85,327

G. AS PER GSTR-1M, MONTAGE PRINTPACK SALES PVT. LTD., GWALIOR (23AAMCM9078M1ZP) HAD ISSUED TAX INVOICES TO THE FOLLOWING SUSPICIOUS FIRMS/COMPANIES:

Sl. No.	Consignee Name & GSTIN		anies as per G	olved on the invoices issued to s as per GSTR-1M of M/s MPSPL, Gwalior		
		2019-20	2020-21	2021-22	2022-23	
1	07BDNPS7160Q1ZJ Ajay Trading Co	-	2,95,627	-	-	
2	18AJUPU0082F1ZR Kamakhya Trading Co	-	20,88,619	-	-	
3	22APSPC9712N1ZI Choudhary Sales	2,53,40,456	10,24,357	-	-	
4	22DGAPS4834P1ZZ Dilip Enterprises	25,20,367	4,12,16,731	2,34,29,842	-	
5	23AHHPT2260P1ZY D K Enterprises	60,77,615	69,66,958	37,79,711	-	
6	23AMWPM1054A1ZC Om Sai Trading Company	-	-	1,10,65,651	-	
7	23APYPT1275M1Z1 Tomar Sales	-	-	2,04,54,224	1,54,18,083	
8	23BHFPH9745E1ZE HR Enterprise	-	-	1,73,38,035	-	
9	23BPJPS8789B1ZE Kansana Enterprises	3,10,55,939	-	-	-	



10	23BPJPS8789B2ZD Dharmveer Sales	52,70,159	5,39,02,035	1,05,45,567	6,46,668
11	23ELVPK9548F1ZG Kumar Traders	-	2,68,60,268	73,32,766	-
12	23FLVPR3392P1ZX Rawat Trading Company	-	-	2,04,05,924	22,85,001
13	23GQNPS5195F1Z9 Ahmana Traders	3,26,75,207	-	-	-
14	24DWEPM6328E1ZM Aakar Trading Syndicate	1,48,055	59,22,781	-	-
15	27AHHPT2260P1ZQ D.K. Enterprises	20,00,049	8,73,018	4,10,034	-
16	36BNVPK3975K1Z2 Mask Enterprise	-	42,17,763	-	-
	Total	10,50,87,847	14,33,68,156	11,47,61,755	1,83,49,751

4.3 Whereas, the registered principal place of business of the bogus firms/companies identified from the GSTR-1M of M/s MEPL and its depots as detailed in **para 4** were visited by the officers of DGGI/respective Commissionerate under Authorization for Search/Inspection and the outcome of the Search/Inspections is summarized in column (3) in table given hereunder:

And whereas, summonses were issued at the registered principal place of business, and at the residential addresses of the Proprietor/Partners/Directors of the firms/companies. The Summonses were sent through speed post and forwarded on registered e-mail also. However, except few no one appeared and most of the summons were retuned undelivered. The summons which was returned undelivered is also summarized in column (4) in table given hereunder:

A. Firms to whom tax invoices were issued by M/s Montage Enterprises Pvt Ltd., Jammu, Haridwar, Noida, & Malanpur

Sl.	Consignee GSTIN, Name &	Outcome of Search/Inspection	Outcome of
No.	Address	······································	Summons issued
(1)	(2)	(3)	(4)
1	01BIKPC6617E1ZS Globe Enterprises Kartholi, Dasal, Bari Brahmana, Samba, Jammu and Kasmir, 181133	Mr. Gushu Ram owner of the premise informed that he never rented out his premise to M/s Globe Enterprise or Mr. Ramesh Chander (RUD-17)	Mr. RameshChanderappeared,andstatementrecorded(RUD-285)
2	07AAHCB5448H1ZK BPSR Industries Pvt. Ltd. Shop No11, Plot No2, Pocket-6 Malik Buldicon Plaza, Sector-12, Dwarka, Delhi, 110078	Mr. Sudheer alias Mr. Surendra (9871762805) owner of the said premise informed that no firm in the name of M/s BPSR Industries Pvt. Ltd., ever operated from his shop (RUD-18A)	Summons was returned undelivered with remark "No such Firm & Ankit Pate Par Nahi Rahate Hai" (RUD- 18B)
3	07AAHCC6179Q1ZU Catania Enterprises Pvt. Ltd. A-10/5, Ground Floor, Jhilmil	Mr. Narendra Singh (9910109239) owner of the said premise informed that they never had given their premise on rent to	Summons was returned undelivered with remark "No such Firm" (RUD-19B)



	Industrial Area, Near Tata Motors,	M/s Catania Enterprises Pvt. Ltd. (RUD-	
	Shahdara, Delhi-110095	19A)	
4	07AAHCG0818Q2Z7 Gwalior Enterprises Pvt. Ltd. Space No216, Plot No19, Radha Chamber, G-Block Community Centre, Vikas Puri, Delhi-110018	Shri Naveen Kumar (931329961), owner of the said premise informed that he never rented out the space on rent to M/s Gwalior Enterprises Pvt. Ltd. (RUD- 20A)	Summons was returned undelivered with remark "No such Firm" (RUD-20B)
5	07AAHCG0827H1ZQ Ghaziabad Enterprises Pvt. Ltd. 302, 3 rd Floor, Pankaj Tower, Commercial Centre, Vikas Puri, Delhi, 110018	Mr. Arun Gupta (9810061857) owner of the premises informed that he never heard about M/s Ghaziabad Enterprises Pvt. Ltd., and since October 2020 he operates his own law firm from the said premise (RUD-21A)	Summons was returned undelivered with remark "No such Firm" (RUD-21B)
6	07AALCM8399L1ZG Mantova Enterprises Pvt. Ltd. UG-17, Tower No. 4, Vishwa Deep, District Centre, Janak Puri, Delhi- 110058	Shri Jai Kishan Singh informed that around two years ago there was a sign board with such name was affixed on the adjoining shop, but the shop was opened only once or twice a month and no business activity was ever noticed (RUD - 22A)	Summons was returned undelivered with remark "No such Firm" (RUD-22B)
7	07AATFG8021G1Z8 Global Trading Co Shop In, H. No150, Badami Business Centre, Kilokari, Delhi, 110014	The shops owner in the Badami Business Center informed that no address as H.No. -150, Badami Business Centre, Kilokari exist there and there are only 15 shops. (RUD-23A)	Summons was returned undelivered with remark "No such Firm" (RUD-23B)
8	07ADGPT2590M2ZX Proview Traders 27/4, Ground Floor, Plot No27, Main G.T Road, Dilshad Garden Industrial Area, Delhi, 110095	The locals informed that no firm in the name of M/s Proview Traders ever operated from the said premise and in nearby locality (RUD-24)	Statement of Mr. Vishal Tripathy, proprietor of M/s Proview Traders was recorded (RUD- 283)
9	07ADNPB7822K1ZC P B Associates 1/6485, East Rohtash Nagar, Shahdara, Delhi, 110032	The firm exists at the said address. Shri Pramod Bansal tendered his statement and confirmed that no business activity was taken and only invoices were received and issued (RUD-25)	Statement of Pramod Bansal proprietor of M/s P B Associates was recorded (RUD-284)
10	07AILPC7741F1ZB Gravity Enterprises 1347/B-1, Upper Ground Floor, Gali No. 13, Govindpuri, Kalkaji, Delhi, 110019	Shri Rahul Tripathi, owner of the premise informed that no such firm ever exists at the said premise (RUD-26A)	Summons was returned undelivered with remark "No such Firm" (RUD-26B)
11	07AMRPJ1732H1ZZ Nirbhay Trading Co. H. No413/4, Ground Floor, Gazipur Near School Lane, Gazipur, Delhi, 110092	The address is incomplete/incorrect, and the firm is not traceable in the nearby locality (RUD-27A)	Summons was returned undelivered with remark "No such Firm" (RUD-27B)
12	07APVPC5712R1Z7 Genius Enterprises D-323A, Balaji Complex, Gali No11, Laxmi Nagar, Delhi, 110092	The shopkeepers of other shop in the Balaji Complex informed that no such firm exists in the said premise (RUD- 28A)	Summons was returned undelivered with remark "No such Firm" (RUD-28B)
13	07AQOPH9721P1Z2 Arya Trading Shop No. 33, Andrews Ganj, Delhi, 110049	The sweet shop adjacent to the shop no. 33, informed that no such firm exists at the said premise (RUD-29A)	Summons was returned undelivered with remark "No such Firm" (RUD-29B)



14	07ASCPL1721F1Z7 Sanjay Trading Co H.No117, Ground Floor, Block-C, Gali No-2, Nangali Vihar Extn, Najafgarh, Delhi, 110043	The address is incomplete/incorrect, and the firm was un-traceable in the nearby locality (RUD-30A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-30B)
15	07AWUPA7355A2ZJ M.R. Enterprises Plot No. 5-1/133, C-Block, Kh-40/23, Gali No. 5, Bir Bazar Road, Baprola Vihar, Nangloi, Delhi, 110043	Shri Daya Shakar owner of the premises informed that around two years ago a person had taken one of the shops located at Ground Floor and placed a sign board with such name, however no business activity was ever noticed (RUD-31A)	Summons was returned undelivered with remark "No such Firm" (RUD-31B)
16	07AXHPK0562F1ZO Gupta Enterprises B-7, Ground Floor, Dharam Colony Taneja Complex, Khasra No 33/20, 21/1, Nangloi, Delhi, 110041	The locals informed that no such firm ever existed at the said premises or in nearby locality (RUD-32A)	Summons was returned undelivered with remark "Puchtash Karne par Firm ka Pata Nahi Chala" (RUD- 32B)
17	07AZCPN6735E1ZD Nafeesh Trading Co. H. No150, Badami Business Centre, Kilokari, Delhi, 110014	The shops owner in the Badami Business Center informed that no address as H.No. -150, Badami Business Centre, Kilokari exist there and there are only 15 shops. (RUD-33A)	Summons was returned undelivered with remark "No such Firm" (RUD-33B)
18	07BDIPJ1111P1ZK Sun Trading Company 111 Old 7L New No 48, Ground Floor, Kh No 22/13 Surat Singh Enclave, Block-Y, Adarsh Enclave Prem Nagar, New Delhi-110041	Sign board at one premise of M/s Sun Trading Company was placed but the same was closed. Mr. Arvind Giri from the nearby shop informed that he is running his shops since last 9 years, but no business activity was ever noticed from the said premise (RUD-34A)	Statement dated 24.08.2023 of Shri Manish Kumar Jha Prop. M/s Sun Trading Company (RUD-288)
19	07BDSPK7832A1ZG Ridhi Traders Plot No. 221, Kh No. 57/6/2, Ground Floor, Gram Sabha Lal Dora Village, Prahaladpur Bangar, Delhi, 110042	The address is incomplete/incorrect, and the firm was un-traceable in the nearby locality (RUD-35A)	Summons was returned undelivered with remark "Kh. No. se Pata Nahi Chala" (RUD- 35B)
20	07BFHPP9940K1ZS Unique Traders Plot No2, Kh. No. 42/2-P No290, Village Nangloi, Delhi-110041	Shri Rajbal owner of the premises informed that he never rented any of the rooms built on the said plot no P-290 to M/s Unique Traders for any purpose (RUD-36A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-36B)
21	07BGRPS1887H1ZM Mayo Enterprises Shop at Plot No48, Ground Floor, Near Radha Krishan Dharam Kata, Gurudwara Road Gali No13 Siraspur, Delhi-110042	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-37A)	Summons was returned undelivered with remark "Kh. No. se Pata Nahi Chala" (RUD- 37B)
22	07BJRPN7668C1ZN P.C. Supplier Co. Unit-206, Second Floor, Plot No-3, Dwarka Sec-12, Pocket-6, New Delhi, 110075	The locals informed that no firm in the name of M/s P.C. Supplier Co. ever operated from the said building (RUD-38A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-38B)
23	07BLFPJ4916H1Z4 D K Trading Company G/F, New 96 Kh No 21/13/2, Laxmi	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-39A)	Summons was returned undelivered with



	Vihar, Prem Nagar Ph 3, Delhi,		remark "Incomplete
	110086		Address" (RUD-39B)
24	07BNJPR5077B1ZU Rai Enterprises G/F, Taneja Complex, Pvt NoB-7, B-8, Kh No33/20, 21/1, Taneja Complex, Dharam Colony, Nangloi, Delhi, 110041	The locals informed that no such firm ever existed at the said premises or in nearby locality (RUD-40A)	Summons was returned undelivered with remark "No such Firm" (RUD-40B)
25	07BPNPN0572H1ZO R.N. Trading Co H. No10, Harphool Vihar, Baprola, Nangloi, Delhi, 110041	The locals informed that there is block system in the said locality and every address is having block no. A, B, C etc. but no A-1 block. Further, it was gathered that without proper address no address can be located (RUD-41)	Statement dated 24.04.2023 of Shri Rajender Singh Negi Prop. M/s R.N. Trading (RUD-286)
26	07BRCPJ0056P1ZN Om Trading Company A-35, Ground Floor, Jhilmil Industrial Area, Jhilmil, Delhi, 110095	Shri Jagtar Singh (9810326332) owner of the premises informed that before COVID-19, M/s Om Trading Company was functioning for around 3-4 months and left the premise in March 2020. However, no business activity noticed (RUD-42A)	Summons was returned undelivered with remark "LEFT" (RUD- 42B)
27	07BSTPS8497K2ZB Singhania Enterprises C-2/39, New Kondli, Mayur Vihar Phase-III, Delhi, 110096	Ms. Shobha owner of the premises informed that she never heard the name of such firm and had never given the ground floor shops on rent to any such firm (RUD-43A)	Summons was returned undelivered with remark "No such Firm/Person" (RUD- 43B)
28	07BUTPS6855F1ZT Avtar Trading Company Plot NoB-1/133, C-Block Kh. No. 40/23, Gali No. 5, Baprola Vihar, Bir Bazar Road Dass Garden, Delhi, 110043	Premises exist but owner informed that they had not given their shop to any such person or firm (RUD-44A)	Summons was returned undelivered with remark "No such Firm" (RUD-44B)
29	07BUXPP4783K1ZI Pal Trading Co. LG8 D-211/104, Munirka, New Delhi-110021	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-45)	Statementdated03.02.2022ofShriBaburam Pal Prop. M/sPal Trading Co. (RUD-290)
30	07BXAPA6529A1Z3 Aripha Trading Co. H. No. 128, Ground Floor, B/1, Shop No.4, Kilokari, Delhi-110014	One shop namely Mehak Hala Meat is existing at the said address. The owner of the shop informs that no such firm exists at the said premise (RUD-46A)	Summons was returned undelivered with remark "No such Firm" (RUD-46B)
31	07BYPPB4545K1Z4 Adheera Traders Plot No. 23-G, Ground Floor, Shop No. 10/1, Dharam Colony, Nangloi, Delhi, 110041	Mr. Suresh Dalal owner of M/s Shri Ram Proprieties informed that he had never seen any firm in the name of M/s Adheera Traders in any shop build on both sides of Dharam Colony (RUD-47A)	Summons was returned undelivered with remark "No such Firm" (RUD-47B)
32	07CAUPR4187F1Z0 Alston Traders Front Portion Ground Floor, Kh. No. 122, Savita Vihar Radha Vihar Ph-2, Gali No2, Mukandpur, Delhi, 110084	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-48A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-48B)



		Chris Condoon (977007000) Comit	
33	07CINPP9472Q1ZZ Harish Traders Unit-No. 305, 3 rd Floor, Plot No. 4, Sector-G, Mamrams Premium Tower, Kondli Gharoli, Delhi, 110096	Shri Sandeep (8750055290) Security Supervisor showed his unawareness however he informed that no person in name of Shri Harish Prasad had ever taken the said premises on rent (RUD - 49A)	Summons was returned undelivered with remark "No such Firm" (RUD-49B)
34	07CJUPM2255G1ZV Vicky Trading Co 26-D, Ground Floor, Block-D, Pvt. Shop No. 8, Pandav Nagar, Delhi, 110092	Shri Santosh owner of M/s Shree Glass and Aluminium Fabrication informed that the shop was taken by him on rent since last 3-4 years and no such firm exists at the said premise (RUD-50A)	Summons was returned undelivered with remark "No such Firm" (RUD-50B)
35	07CLBPM0865R2ZI Maurya Enterprises Unit No305, 3 rd Floor, Plot No. 4, Sector-G, Kondili Garoli, Delhi, 110096	Shri Sandeep (8750055290) Security Supervisor shows his unawareness however he informed that no person in name of Shri Sandeep Maurya had ever taken the said premises on rent (RUD- 51A)	Summons was returned undelivered with remark "No such Firm" (RUD-51B)
36	07DBFPK8046H1ZH Ram Enterprises C-2/39, Ground Floor, New Kondli, Mayur Vihar Phase-3, Delhi, 110096	Mr. Sushil Tyagi (9911431032) owner of the premises informed that he never rented his premise to M/s Ram Enterprises or Mr. Manoj Kumar (RUD- 52A)	Summons was returned undelivered with remark "No such Firm" (RUD-52B)
37	07DBLPK9034D2ZK Gyan Traders 302, Pankaj Tower, Vikas Puri, Delhi, 110018	Mr. Arun Gupta (9810061857) owner of the premises informed that he rented his premise to Shri Ankit Kumar Gautam in July 2017 to October 2019 and thereafter the premise was vacant upto October 2020 and after that he rented his premise to Mr. Narayan Kamat (RUD-53A)	Summons was returned undelivered with remark "No such Firm" (RUD-53B)
38	07DRXPK8539K1ZP Golf Traders Shop No. 33, Andrews Ganj, Delhi, 110049	The sweet shop adjacent to the shop no. 33, informed that no such firms exist at the said premise (RUD-54A)	Summons was returned undelivered with remark "No such Firm" (RUD-54B)
39	07EATPK4367M1ZT M K Enterprises B-135, Mohan Garden, Hastal Road, Uttam Nagar, Delhi, 110059	The premises was a residential premise and caretaker Mr. Pintu informed that they never let out the premise to any such firm (RUD-55A)	Address" (RUD-55B)
40	o7EFEPK0237Q1Z5 Kumar Enterprises Shop. No. One, Ground Floor, Rani Garden, Shastri Nagar, Delhi, 110031	The address is incomplete/ incorrect, and no such firm could be located in nearby area (RUD-56A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-56B)
41	07EZRPM5505G1Z1 Mau Traders 1402 G1, Gali No.13, Govind Puri, Delhi, 110019	Mr. Pankaj Bhagi (9910322262) owner of the premises informed that he neither rented out his premises to M/s Mau Traders nor to Mr. Mohasin (RUD-57A)	Summons was returned undelivered with remark "No such Firm" (RUD-57B)
42	07FERPS7038C1Z1 A S Sales Kh No188, Ground Floor, Khatoni No26, Dallu Pura, Delhi, 110096	The address is incomplete/ incorrect, and no such firm could be located in nearby area (RUD-58A)	Summons was returned undelivered with remark "Address Left without instructions" (RUD-58B)
43	07FUHPS8719A2ZB Iconic International	The address is incomplete/ incorrect, and no such firm could be located in nearby area (RUD-59A)	Summons was returned undelivered with



	1425/X, Janta Gali, Gandhi Nagar, Delhi, 110031		remark "Insufficient Address" (RUD-59B)
44	07GLDPS5476Q1Z0 S.S. Trading Co. H. No2, Ambedkar Palace, A-1 Baprolla Vihar, Nangloi, Delhi, 110041	The locals informed that there is block system in the said locality and every address is having block no. A, B, C etc. but no A-1 block. Further, it was gathered that without proper address no address can be located (RUD-60)	Statementdated05.04.2023ofShriShriPrabhjeetSinghProp.M/sS.S.S.S.TradingCo.(RUD-287)
45	07HWVPS6195C1ZM Suraj Enterprises H. No10, Harphool Vihar, Baprolla, Nangloi, Delhi, 110041	The locals informed that there is block system in the said locality and every address is having block no. A, B, C etc. but no A-1 block. Further, it was gathered that without proper address no address can be located (RUD-61A)	Summons was returned undelivered with remark "Kafi Puchtash par Pata Nahi Chala" (RUD-61B)
46	07IKIPS8885M3ZQ G.S. Trading Unit 2016, 2 nd Floor, Plot No-3, Sector-12, Pocket-6, Dwarka, Delhi, 110075	The shops only had numbering upto 223 and no shop with number 2016. Further, locals informed that no firm in the name of M/s G.S. Trading ever operated from the said building (RUD-62A)	Summons was returned undelivered with remark "No such Firm" (RUD-62B)
47	08AAKPQ9466A1ZD Basic Traders Rajasthan 801, 8 th Floor, K J City Tower, Ashok Marg, C-Scheme, Jaipur, 302001	No such firm was found working at the time of visit (RUD-63)	Statement of Mo. Shadab Quadri was recorded (RUD-295)
48	o8AJVPA9330R1ZD Zodiac Traders Plot No. 2774, Ground Floor, Road No 15 Vki, Jaipur, 302013	The address is incomplete/ incorrect, and no such firm could be located in nearby area (RUD-64)	
49	o8AOGPK6533E2ZZ Imra Sales Rajasthan Office No701 E-2, 7 th Floor, KJ City Tower, Ashok Marg, C-Scheme, Jaipur, 302005	Mr. Ajay Jain F/o Mr. Mohit Jain (owner of premise) informed that they had rented the said premise to M/s Imra Sales Rajasthan, which was vacated in December 2020 (RUD-65)	
50	09AAHCB5448H1ZG BPSR Industries Pvt. Ltd. Shop No-91, Plot No CP-1, Jeewan Plaza, Viram Khand, Gomti Nagar, Lucknow, U.P., 226010	No such company existed at the said address and local informed that they never heard about M/s BPSR Industries Pvt. Ltd., and Mr. Bhanu Pratap Singh (RUD-66A)	Summons was returned undelivered with remark "No such Firm" (RUD-66B)
51	09AAHCG0818Q1Z4 Gwalior Enterprises Pvt. Ltd. 19B/101, Vrindavan Yojna, RBL Road, Lucknow, U.P., 226010	Mr. Surendra Singh (7985090343) owner of the premises informed that the said house was constructed in May 2018 and since then he never rented out his premises to M/s Gwalior Enterprises Pvt. Ltd. (RUD-67A)	Summons was returned undelivered with remark "No such Firm" (RUD-67B)
52	09AAHCG0827H1ZM Ghaziabad Enterprises Pvt. Ltd. 404, Trinity Harmony Apartment, Wazir Hasan Road, Dalibagh, Lucknow, U.P., 266001	Discrete verification was made and it has been gathered that no such firm ever existed at the said premises or in the nearby locality. Further, the SCN was issued for cancellation but no reply was received. (RUD-68A)	Summons was returned undelivered with remark "No such Firm" (RUD-68B)
53	09AALCM8399L1ZC Mantova Enterprises Pvt. Ltd. Plot No-8, Gata No237, Village Mubarakpur, Lucknow, 226021	The address is insufficient, and no such firm could be located in the nearby area (RUD-69A)	Summons was returned undelivered with remark "No such Firm" (RUD-69B)



54	09AILPC7741F2Z6 M K Trading Co. Kamla Pur, Sitapur, U.P., 261302	The address is incomplete/ incorrect, and no such firm could be located in nearby area (RUD-70A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-70B)
55	09AOZPY6635A1Z6 M.K. Trading Co. S-178, Lekhraj Khajana, Faizabad Road, Lucknow, U.P., 226016	Mr. Arun Garg (9415072567) owner of the said premises informed that he never rented the said premise to M/s M.K. Trading Co. or Mr. Gulveer Yadav (RUD - 71A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-71B)
56	09BFTPT4792K1Z8 Tripathi Enterprises Nandgaon Road, Samken Colony Ke Samne, Kosi Kalan, Chhata, Mathura, U.P., 281403	The address is insufficient/incorrect, and the firm was not traceable. The local postman confirmed that no such firm existed at the given address (RUD-72A)	Summons was returned undelivered with remark "No such Firm" (RUD-72B)
57	09BPTPB6759L2ZZ S K Trading Company Shop No105, Palika Bazar, Kapoorthala, Aliganj, Lucknow, U.P., 226024	Shri Shanu (8708938449) owner of the said premises informed that during the period July 2017 to October 2018 they had rented the premises to Shri Shubhash Kumar Vajpai but he is not aware about M/s S K Trading Company and its working (RUD-73A)	Summons was returned undelivered with remark "No such Firm" (RUD-73B)
58	09BSPPG9767A1ZA Rajeev Trading Co. SS-255, Sector-G, LDA Colony Road, Lucknow, U.P., 226012	Mr. Basant Kumar Pandey owner of the premise informed that the premise is a residential premise and no business activity ever took place from the said premise and no such firm ever existed at the said premise (RUD-74A)	Summons was returned undelivered with remark "No such Firm" (RUD-74B)
59	09BUTPS6855F1ZP Avtar Trading Co. Plot No. 8-A, Kamlabad Badauli, Lucknow, U.P., 226021	Mr. Pradeep Kumar Pandey (9335927537), informed that he was not aware about M/s Avtar Trading Co. or Mr. Avtar Singh and never rented the said premise to M/s Avtar Trading Co. (RUD- 75A)	Summons was returned undelivered with remark "No such Firm" (RUD-75B)
60	09BXNPA3450K1ZB S.A. Enterprises E 2/8, Palika Bazar, Sector-C, Kapoorthala, Aliganj, Lucknow, U.P., 226024	Shri Shanu (8708938449) owner of the said residential premises informed that they never rented out the said premises to M/s S.A. Enterprises or Mr. Shakil Ahmad (RUD-76A)	Summons was returned undelivered with remark "No such Firm" (RUD-76B)
61	09CBIPA0305H1Z7 Govind Enterprises N.H. 2, 1 st Floor, In front of Anaj Mandi Gate No. 1, Kosi Kalan, Mathura, U.P., 281403	The address is insufficient/incorrect, and the firm was not traceable. The local postman confirmed that no such firm existed at the given address (RUD-77A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-77B)
62	09DJQPK5086N1Z6 K.M. Trading Co. Infront of Transformer, Nabiganj, Nawabganj, Barabanki, U.P., 225305	The address is insufficient, and no such firm could be located in the nearby area (RUD-78A)	Summons was returned undelivered with remark "लिखित पते पर पता नहीं चला" (RUD- 78B)
63	09DMHPK7624A1Z4 G.S. Trading Co. Mallahi Tola, Near Jal Sansthan, Thakurganj, U.P., 226016	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-79A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-79B)



		$O_{\rm P}$ a summary M/z $O_{\rm P} = 1$ $D_{\rm P}$	
64	o9DWWPS0227J1ZT P.C. Supplier Co. 159, Sahara Shopping Center, Faizabad Road, Indira Nagar Lucknow, U.P., 226016	One company M/s Cawnk Pharmaceia Pvt. Ltd., was operating from the said premise since January 2018 and no such firm ever existed at the said premise (RUD-80A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-80B)
65	09ETKPS6789F1ZO Surya Trading Company Radha Krishna Pandey, Atariya, Sidhauli, Sitapur, U.P., 261303	The address is insufficient/incorrect, and the firm was not traceable. The local postman confirmed that no such firm existed at the given address (RUD-81A)	Summons was returned undelivered with remark "No such Firm" (RUD-81B)
66	09GUGPS2927N1ZR R S Enterprises Khasra No54, Navikot Nandana, Sitapur Road, Bakshi Ka Talab, Lucknow, U.P., 227202	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-82A)	Summons was returned undelivered with remark "तलाश करने पर पता नहीं चला" (RUD- 82B)
67	09GXUPS5402R1Z7 Nisha Sales H. No. 554, Rajeev Nagar, Mahaviranpura, Jhansi Khas, Jhanshi, U.P., 284003	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-83A)	Summons was returned undelivered with remark "No such Firm" (RUD-83B)
68	09HAIPS2009Q1ZY Manish Enterprises Near 132 KVA Bijli Ghar, Nandgaon Road, Kosi Kalan, Chhata, Mathura, U.P., 281403	The address is insufficient/incorrect, and the firm was not traceable. The local postman confirmed that no such firm existed at the given address (RUD-84A)	Summons was returned undelivered with remark "No such Firm" (RUD-84B)
69	18AALCM8399L1ZD Mantova Enterprises Pvt. Ltd. Hajo Road, Amingaon, Guwahati, Kamrup, Assam, 781031	The locals/security personnel informed that no firm in the name of M/s Mantova Enterprises Pvt. Ltd., ever operated from the said premise or in the nearby locality (RUD-85)	Statement dated 26.06.2021 & 29.06.2021 of Shri Hansbir Betala managing M/s Manchester Enterprises Pvt. Ltd. (RUD-294)
70	18AALCM8855D1Z1 Manchester Enterprises Pvt. Ltd. 300Sq, Orchid Garden, Khanamukh Jalukbari Guwahati, Assam, 781014	The locals/security personnel informed that no firm in the name of M/s Manchester Enterprises Pvt. Ltd., ever operated from the said premise or in nearby locality (RUD-86)	
71	19ARFPM0150K1ZS Mas Sales Corporation 23, Ground Floor, Sir Syed Ahmed Road, Kolkata, W.B., 700014	SCNs were issued to clarify the reason for application of cancellation, but no reply was submitted by the party, hence, GST registration was cancelled (RUD-87)	
72	20AAGFI6942P1Z2 Impex Global 194, Getalatu, Opposite BSNL Training Center, Vikash, Sadar, Ranchi, Jharkhand, 835217	SCNs were issued to file returns not filed for a continuous period of 6 months, but no reply was submitted by the party, hence, GST registration was cancelled (RUD-88)	
73	21AAKPQ9466A1ZP Basic Traders Plot No. 311F, CDA Sector-10, Market Nagar, Cuttack, Odisha, 753014	During Statement of Mo. Shadab Quadri, he admitted that M/s Basic Traders Rajasthan (08AAKPQ9466A1Z) & M/s Basic Traders (21AAKPQ9466A1ZP) are registered on his PAN, and were indulged in bogus transaction with M/s MEPL (RUD-295)	
74	21AOGPK6533E2ZB Polymart Traders Plot No. 2335/4061/5323, Jagatpur, Cuttack, Orissa, 754021	During Statement of Mo. Ali Akram Khan, he admitted that the firm was registered on his PAN and was indulged in bogus transaction with M/s MEPL (RUD-296)	



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75	22ADBPT8598E1Z8 Bhagyashree Sales Shop No6 Manglam Mall, Near Agrasen Chowk, Samta Colony, Raipur, Chhattisgarh, 492001	Mr. Manoranjan Pandey owner of the said premise informed that he was not aware about M/s Bhagyashree Sales or Mr. Anil Thakre and never rented the said premise to M/s Bhagyashree Sales (RUD-89A)	Summons was returned undelivered with remark "Not Known" (RUD-89B)
76	22BTDPJ4048N1ZM Raipur Sales G/10, Wing-III, Capital Palace, Kavita Nagar, Raipur, Chhattisgarh, 492001	The premise was a 3BHK flat and lying vacant from last many years. Mr. Fahim Khan caretaker of the premise informed that M/s Raipur Sales never exists at the said premise (RUD-90A)	Summons was returned undelivered with remark "Not Known" (RUD-90B)
77	22BXDPG5417J1ZQ Astha Traders Rajesh Complex, Block No-9, Parking No-6, Transport Nagar, Ravatbhata, Raipur, Chhattisgarh, 492003	The address is incomplete/incorrect, and the firm was not traceable (RUD-91A)	Summons was returned undelivered with remark "Not Known" (RUD-91B)
78	22IVTPS1390K1ZT R.B. Enterprises Shop No-6, Manglam Mall, Near Agrasen Chowk, Samta Colony, Raipur, Chhattisgarh, 492001	Mr. Manoranjan Pandey owner of the said premise informed that he was not aware about M/s R.B. Enterprises or Mr. Ram Bahadur Singh and never rented the said premise to M/s R.B. Enterprises (RUD- 92A)	Summons was returned undelivered with remark "Not Known" (RUD-92B)
79	23ABVPO1550F2ZM Asha Industries 79, Iqtadar Manzil, Opp Moti Masjid, Bhopal, M.P., 462001	SCNs was issued to file returns not filed for months, but no reply was submitted by registration was cancelled (RUD-93)	-
80	23ADWPT8362K1ZM Simran Trading A/7, Shankar Puri, Govardhan Colony Bhind Road, Gole Ka Mandir, Gwalior, M.P., 474005	Order was issued by MP state GST that the taxpayer had availed ITC without receipt of goods. GSTIN was cancelled and no reply was received (RUD-94A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-94B)
81	23AVVPG2313G1ZT Gaurav Corporation I4, Aditya Puram, Airport Road, Gwalior, M.P., 474002	SCNs was issued to clarify the Parameters mentioned in Notification No.03/2018 dated 23.01.2018, but no reply was submitted by the party, hence, GST registration was cancelled (RUD-95)	
82	23BXDPG5417J1ZO Ashta Traders Jayendraganj, F-27, Sanjay Complex, Lashkar, Gwalior, M.P., 474001	The registration was cancelled on the application of taxpayer. However, Summons was issued to the tax payer and its proprietor but returned undelivered with remark "Insufficient Address" (RUD- 96)	
83	23EHFPP8744G1Z2 J M D Trading Co Shope No2, Gram Mohala, Bypass Road, Bhopal, M.P., 462023	The GSTIN of the firm was cancelled <i>suo- moto</i> being registration has been obtained by means of fraud, willful misstatement or suppression of facts (RUD-97A)	Summons was returned undelivered with remark "No Remarks" (RUD-97B)
84	23HRAPS7815D1ZS P S Corporation H. No. 118, Barkhedi, Aish Bagh Road, Bhopal, M.P., 462008	The GSTIN of the firm was cancelled <i>suo-</i> <i>moto</i> being the taxpayer has failed to file six monthly returns. No reply was received hence, Order for cancellation of GSTIN was issued (RUD-98A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-98B)
85	24ATUPD1928M1ZB Alfa Enterprises Shop 2, 1 st Floor, Opp. Sarni Kamdar Society, Nr. N.K. School, Jivraj Park, Ahmedabad, Gujarat, 380051	The GSTIN of the firm was cancelled being not filed six continuous monthly returns (RUD-99A)	Summons was returned undelivered with remark "Not Remarks" (RUD-99B)



	24DKHPM5514D1ZF	The GST registration of the firm was	
86	S M Traders Godown No. 9, S.K. Tiles Compound, Sarkhej Sanand Road, Sarkhej, Ahmedabad, Gujarat, 382210	cancelled as per direction issued by the DC(AE), Ahmedabad North vide letter F.No. GEXCOM/AE/FU/1249/2022/ 2199 dated 22.09.2022 (RUD-100A)	Summons was returned undelivered with remark "No such Firm" (RUD-100B)
87	29ABPPZ7252H1ZR Elegant Traders Situated at 1 st Main 120, Padmeshwari Nagar Near Kamadhenu Devi Temple, Kittaganur Virgo Nagar, Bengaluru Urban, Karnataka, 560049	The GSTIN of the firm was cancelled <i>suo- moto</i> being the taxpayer has failed to file six monthly returns. No reply was received hence, Order for cancellation of GSTIN was issued (RUD-101A)	Summons was returned undelivered with remark "No such Firm/ Person" (RUD-101B)
88	29BMUPS2847A1ZK Impact Traders No. 27, G/F, Gundappa Reddy Layout, C N Halli R Nagar Post, Bengaluru Urban, Karnataka, 560032	SCN is already issued to these two firms being indulged in availment and passing on of irregular ITC (RUD-102)	
89	29BVSPA2131G1ZP Multilayer Traders No. 53, Shop No. 3, 6 th Cross, Near Ayesha Masjid, Ramakrishna Hegde Nagar, Bengaluru Urban, Karnataka, 560077	SCN is already issued to these two firms being indulged in availment and passing on of irregular ITC (RUD-103)	
90	29CMQPP6968Q1ZF A M Traders No. 46, Situated Opp to Christ King School, 7 th Cross Akshaya Nagar, New Manjunath Layout Ramurthy Nagar, Bengaluru Urban, Karnataka, 560016	The GSTIN of the firm was cancelled <i>suo- moto</i> being registration has been obtained by means of fraud, willful misstatement or suppression of facts (RUD-104A)	Summons was returned undelivered with remark "Insufficient Address and LEFT" (RUD-104B)
91	36BGUPA2323M1Z8 Crystal Traders 18-13-8/A/28 and Farhen, Gagan Pahad, Katedan, Rangareddy, Telangana, 500077	SCN was issued that excess ITC was availed during the period 2018- 19 & 2019-20 in violation of the provisions of this act. Hence GST registration was cancelled (RUD-105)	
92	36BPAPA5534D1ZH MAZ Traders 22-8-588/1, Lakkad Kote, Chatta Bazar, Charminar, Hyderabad, Telangana, 500002	The registration was cancelled on the application of taxpayer. However, Summons was issued to the tax payer and its proprietor but returned undelivered with remark "No Such Person" (RUD- 106)	

B. Firms to whom tax invoices were issued by M/s Montage Sales Pvt Ltd., Delhi, M/s Montage Flexipack Sales Pvt. Ltd., Lucknow and M/s Montage Printpack Sales Pvt. Ltd., Gwalior

Sl.	Consignee GSTIN, Name &	Outcome of Search/Inspection	Outcome of
No.	Address		Summons issued
1	06AWRPM0914E1ZM Osis International Ocus Quantum, Sector-51, Gurgaon, Haryana 122003	As per GST returns the firms had neither av However, as per 2A, ITC was auto-p summons issued was returned undelivered Address" (RUD-107)	opulated. Further, the



	of DWWDW1016 D17E		Cummona
	06BWYPV1916P1ZE Jai Bhawani Traders	No such address exists in the said area,	Summons was returned undelivered
2	H. No. 875, Navdeep Colony, Near CR	and the firm was not traceable in nearby	with remark "Address
2	College, Azad Nagar, Hisar, Haryana,	locality (RUD-108A)	Not Traceable" (RUD -
	125001		108B)
	06FACPK6158L1ZC	As per GST returns the firms had neither av	
	United International	However, as per 2A, ITC was auto-p	-
3	526, Bahalgarh, Deepalpur Road,	summons issued was returned undelivered	
	Sonipat, Haryana, 131021	Address" (RUD-109)	
	06IQSPS7194P1ZA	The address was discretely verified and fo	ound the firm was not in
	Ganpati Enterprises	existence at the declared premise. Furthe	
4	H. No. FCA 74, Nawlu Colony,	registered mobile number but the san	ne was found inactive.
	Ballabhgarh, Faridabad, Haryana	Further, Summons issued was returned u	
	121004	"Unclaimed returned" (RUD-110)	
	07AAEPK3770F2ZT	The address is in some late (in some stand	Summons was
_	Shri Mahaveer Ji Sales Corporation	The address is incomplete/incorrect, and the firm was not traceable in nearby	returned undelivered
5	Khasra No. 12/26, Bijapur, Village	locality (RUD-111A)	with remark "No such
	Budhpur Bijapur, Delhi, 110082		Firm" (RUD-111B)
	07AAGFU2991L1ZL		
	Urban Trade Industries	The address is incomplete/incorrect, and	Summons was
6	Office No.403, 4 th Floor, Metro	the firm was not traceable in nearby	returned undelivered
U	Complex, Building No. 4/5, Near Veer	locality (RUD-112A)	with remark "No such
	Saverkar Market, Nirman Vihar, Delhi,		Firm" (RUD-112B)
	110092		
	07AAIFE1973E1ZI		Summons was
	Elfed Industries	No such firm exists at the said premises	returned undelivered
7	Office No. 102, 1 st Floor, Plot No. E-22,	(RUD-113A)	with remark "No such
	Jawahar Park, Laxmi Nagar, Delhi,		Firm" (RUD-113B)
	110092 07AAIFL7295E1Z0		
	Life Wellness	The GSTIN was cancelled w.e.f. 31.03.20	222 under Rule 21(2) -
8	Plot No. 131, Ground Floor, Pkt-H,	person does not conduct any business	
U	Sector-1, Bawana, DSIDC City,	business (RUD-114)	from declared place of
	Bawana, Delhi, 110039		
	. , .,	Shri Ajay Verma, Consultant of the firm	
		(9958216699) informed that they have	
		vacated the said premise one week ago	G
	07AAMCA0840R1Z9	and shifted to another premise located at	Summons was
9	Arranger Tradelinks (India) Pvt. Ltd. 404, 4 th Floor, Madhuban Building,	402, 4 th Floor, which was also found	returned undelivered with remark "No such
	404, 4 ^{ai} Floor, Madnuban Building, Nehru Place, Delhi, 110019	locked/closed. He also informed that all	Person" (RUD-115B)
	Nelliu Flace, Dellii, 110019	the details/documents were available	reison (KUD-115D)
		with their CA due to shifting (RUD-	
		115A)	
	07AAOPG0924D1Z2	The said premise is locked from many	Summons was
	Avi Foil Traders	years and the owner of the said premises	returned undelivered
10	H. No. 474, Ground Floor, Kh No.	once in while open the said premises.	with remark "No such
	105/78, Village and Post Khera Kalan,	Further, the said premises is the	Firm" (RUD-116B)
	Near Shiv Mandir, Delhi, 110082	residential premises (RUD-116A)	
	07AAUPQ6586B3Z2	Shri Vipin Tondon informed that he	Summons was
	Swastik Enterprises	never rented out any of the portion of that $M(a, b) = M(a, b)$	returned undelivered
11	H. No4, 3 rd , Ph-I, Community Centre, Naraina Industrial Area, Delhi,	building to M/s Swastik Enterprises or Mohammad Qurraish, Proprietor of M/s	with remark "Incomplete Address"
	LIGHTER Naraina Inductrial Area Delhi	Wonamman Ultraish Proprietor of M/s	incomplete Address"
	110028	Swastik Enterprises (RUD-117A)	(RUD-117B)



12	07ABAFR7758R1Z9 Radical Corporation Office No, 403, 4 th Floor, Building No. 4/5, Veer Saverkar Market, Nirman Vihar, Delhi, 92	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-118A)	Summons was returned undelivered with remark "No such Firm" (RUD-118B)
13	07ACTPI0807Q1Z2 Surya Enterprises Off. No. TC/607, Near Pacific Mall, C.H.S Road, Transit Camp, Raghubir Nagar, Delhi, 110027	Mr. Ramban Yadav owner of the premises informed that he is the owner of that premises and never rented the same to M/s Surya Enterprises or Mr. Akash Manoj Ingle (RUD-119A)	Summons was returned undelivered with remark "No such Firm" (RUD-119B)
14	07AEAFS4741N1ZP S.G. Enterprises Shop No. 4, Kh No59, Saket, South Delhi, Delhi, 110030	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-120A)	Summons was returned undelivered with remark "No such Firm" (RUD-120B)
15	07AFUPJ0552P1ZU Mahalaxmi Enterprises Plot No. J-108, Mohan Garden, Uttam Nagar, Near R.P. Property, New Delhi, 110059	Shri Pramod Sehgal (9990484862) owner of the said premises informed that he never rented out his premises to M/s Mahalaxmi Enterprises (RUD-121A)	Summons was returned undelivered with remark "No such Firm" (RUD-121B)
16	07AHGPR4479K1ZO Katyayani Enterprises 10/33, Ground Floor, Vishwas Nagar, Patel Galir, Shahdara, Delhi, 110032	Statement of Mr. Vinay Rewari, Propri Enterprises was recorded in wherein he supplied by M/s MSPL, only invoices were	admitted that no goods
17	07AHKPH3924R1ZS Aavesh Enterprises Off. No 123/A, Near Singh General Store, Ravi Nagar Road, DDA Colony, Chaukhandi, Vishnu Garden, Delhi, 110018	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-122A)	Summons was returned undelivered with remark "No such Firm" (RUD-122B)
18	07AKLPJ5035D1ZD Blue Star F-24, Vardhman Select Mall, Block-I, Narela Industrial Area, Delhi, 110040	Shri Jaivinder Singh (9818798364), informed that he owns F-24, F-25, F-26, F-27 from the year 2008 and since then he never rented out his shop to M/s Blue Star (RUD-123A)	Summons was returned undelivered with remark "No such Firm" (RUD-123B)
19	07ALGPU1224R2ZK Aggarwal Traders Plot No. 14/12, Nala Road, MCD Office, Okhla Industrial Area, Delhi, 110020	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-124A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-124B)
20	07ALMPU0109M1ZR S S Traders Shop No 1, Plot No 13, Tilak Enclave Part-2, Mohan Garden, Uttam Nagar Play Factory, Delhi, 110059	The GSTIN of the firm was cancelled <i>suo- moto</i> being issues any invoice or bill without supply of goods and/or services in violation of the provisions of this Act (RUD-125A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-125B)
21	07ANCPY3290M1ZD Yadav Enterprises F/F, H.No 183, Naraina, Opposite PNB Bank, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-126A)	Summons was returned undelivered with remark "No Such Firm" (RUD-126B)
22	07ANUPH4951N1Z8 Mehul Enterprises H.No255, JJ Colony, Madanpur Khadar, Delhi, 110076	No such firm exists at the said address. Further, Shri Hitech Chouhan proprietor of the firm that the said firm is not belongs to him and his credentials had been misused (RUD-127A)	Summons was returned undelivered with remark "No Such Firm/Person" (RUD- 127B)



		The security guards informed that the	
23	07ANYPR8387E1ZZ S. V. Enterprises 62, 2 nd Floor, Pocket-11, Sector-24, Rohini, Delhi, 110085	said premises is locked from many years and the owner of the said premises resides in Gurugram. Further, the said premises is the residential premises (RUD-128A)	Summons was issued but no response was received (RUD-128B)
24	07AOCPK8764K1ZG Kumar Enterprises G-182, 2 nd Floor, Sector-2, Bawana, Delhi, 110039	Shri Deepak Gupta (9810199253) had informed that the premise is in his possession since last 6 years and since than running his own business. He further informed that he never rented out the said premise to M/s Acrosys Tech (RUD-129A)	Summons was returned undelivered with remark "No such Firm" (RUD-129B)
25	07AOKPK9451R2ZZ Jajoria Enterprise H. No. 16/569-I, Gali No. 18, Arya Samaj Road, Bapa Nagar, Karol Bagh, Delhi, 110005	Mr. Krishan Kumar informed that he provided his KYC documents to Mr. Anmol for job. Mr. Anmol asked him to open a bank account for salary and got registered a firm namely M/s Jajoria Enterprises based on his KYC. Further, he informed that he has filed a police complaint (RUD-130A)	Summons was returned undelivered with remark "Puchtach karne par pata chala is pate par nahi rahte" (RUD-130B)
26	07ASCPN4947P1Z2 Neelima Enterprises B-158, Sadatpur, ST No. 2, Karawal Nagar, Shahdara, Delhi, 110094	During visit at the registered premise Ms. Neelima was present and inform that she had created the firm for doing business through MESSO (RUD-291A)	Statement dated 12.12.2023 of Ms. Neelima Prop. M/s Neelima Enterprises (RUD-291B)
27	07ASQPR5114G1ZI P.R. Traders Kh No. 125, Hamidpur, Delhi, 110036	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-131A)	Summons was returned undelivered with remark "No such Firm" (RUD-131B)
28	07ATWPM4771H1Z0 Galaxy Impex A-45, Block-A, Wazirpur Industrial Area, Wazirpur, Delhi, 110052	The taxpayer was found non-existent during the physical verification. Accordingly, <i>suo-moto</i> cancelled (RUD- 132A)	Summons was returned undelivered with remark "No such Firm" (RUD-132B)
29	07AUKPD2924N1ZF Sunil S Traders 136-B, Near Shiv Shakti Mandir, Janta Flat, National Market School Road, Ekta Enclave, Peera Garhi, Delhi, 110041	The address was a residential premise and found closed. Further, neighbours informed that they never seen any business activity from the said premise (RUD-133A)	Summons was returned undelivered with remark "No such Firm" (RUD-133B)
30	07AUOPK8454G1Z6 Image India A-23, Prem Nagar-II, Kirari Suleman Nagar, Delhi, 110086	The address was a residential premise and found closed. Further, neighbours informed that they never seen any business activity from the said premise (RUD-134A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-134-B)
31	07AXUPV6358F1ZM Sky International Shop No4, Kh No59, Saket, Delhi, 110030	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-135A)	Summons was returned undelivered with remark "No such Firm" (RUD-135B)
32	07AYCPT3547R2ZL Tyagi Traders H. No. SRS-173, 1 st Floor, Naraina, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-136A)	Summons was returned undelivered with remark "No such Firm" (RUD-136B)



33	07AYQPT5265L2ZG ST Traders H.No19, Block-A, Phase-I, Naraina Industrial Area, Delhi, 110028	Shri Rakesh Sachdeva (9810072641), President, Naraina Industries Association Phase-I & II informed that no such address exists in the said industrial area. However, he informed that in block- A one factory is located at plot no. 19. Thereafter, the officers reached at Plot A- 19, where on inquiry it was gathered that M/s GPC Apparels (GSTIN 07AAVFG2996G1ZQ), is working from there since June 2020. Further, the Authorized Signatory of M/s GPC Apparels provided the contact details of the owner Shri Anil Malik (9811084399), he informed that he has never rented out his premises since July 2017 to any M/s S T Traders and he is not having any information of the said firm (RUD- 137A)	Summons was returned undelivered with remark "No such Firm" (RUD-137B)
34	07AZVPR2782C1ZV Das Enterprises H. No. SRS-73, 1 st Floor, National Market, Naraina, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-138A)	Summons was returned undelivered with remark "अधूरा पता" (RUD-138B)
35	07BBVPH7773J1ZT Vishal Enterprises 3, D-280, Saket Place, Delhi, 110017	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-139A)	Summons was returned undelivered with remark "No such Firm/Person" (RUD- 139B)
36	07BDNPS7160Q1ZJ Ajay Trading Co Plot 17/42 And 17/43, Ground Floor, Block-D, JJ Colony, Shahabad Dairy Near Roop Krishna, Delhi, 110042	Mr. Murari Lal owner of the premises stated that he rented out the said premise to M/s Ajay Trading Co. He further stated that one person came in 8-10 days however no goods were received or supplied from the said premise (RUD- 140A)	Summons was returned undelivered with remark "No such Firm" (RUD-140B)
37	07BDPPD1016E1Z2 Renu Enterprises W-137, Ground Floor, Naraina Industrial Area, Naraina Phase-1, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-141A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-141B)
38	07BDSPK7832A2ZF Ragni Enterprises B-72, Yadav Park, Nangloi, Delhi, 110041	Mr. Mahendra owner of the said premise informed that they rented the said premise to Mr. Praveen Garg, but the shops remain closed and there was only one chair and a table placed in the shop (RUD-142A)	Summons was returned undelivered with remark "LEFT" (RUD-142B)
39	07BETPY0156F2Z1 Kapur Enterprises Kh. No. 15/14, 1 st Floor, MCD Office, Qutub Road, Delhi, 110055	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-143A)	Summonswasreturnedundeliveredwith remark "No suchaddress"(RUD-143B)



40	07BFHPP9940K2ZR Esprit Enterprises Plot No171/1, Ground Floor, Block- WZ, Shakurpur, Delhi, 110034	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-144A)	Summons was returned undelivered with remark "LEFT" (RUD-144B)
41	07BFKPG9015D1ZN Acrosys Tech G-82, Sector-2, Bawana Industrial Area, Bawana, Delhi, 110039	Shri Deepak Gupta (9810199253) had informed that the premise is in his possession since last 6 years and since than running his own business. He further informed that he never rented out the said premise to M/s Acrosys Tech (RUD-145A)	Summons was returned undelivered with remark "No such Firm" (RUD-145B)
42	07BGRPS1887H2ZL Virgo Enterprises H. No. 10, Ground Floor, Extn-2-C, Nangloi, Delhi, 110041	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-146A)	Summons was returned undelivered with remark "No such Firm" (RUD-146B)
43	07BIWPR8811F1ZN Azad Trading 988A, Shop No. 1, Sir Chhotu Ram Marg, Raj Nagar, II, Palam Colony, Delhi, 110077	Shri Lokesh Malawat had informed that he never rented out the said premise to M/s Azad Trading or Mr. Azad Kumar Raut (RUD-147A)	Summons was returned undelivered with remark "No such Firm" (RUD-147B)
44	07BJOPH4621J1Z2 Hari Sales Corporation 97840/23, MCD Office, Shakarpur, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-148A)	Summons was returned undelivered with remark "No such Firm" (RUD-148B)
45	07BJVPK8809G1ZL Winjet Industries H. No96, Ground Floor, Gali No05, Block, E-5, Near Metro Shastri Nagar, Shastri Nagar, Delhi, 110052	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-149A)	SummonswasreturnedundeliveredwithremarkAddress"(RUD-149B)
46	07BLVPP6162R1ZV Subrat Trading Company Plot No. 489, Ground Floor, Shahbad, Daulatpur, Delhi, 110042	Three different firms were working from the given address, but no firm in the name of M/s Subrat Trading Co. was found in existence. On being enquired, it was informed by Shri D.P. Pathak Supervisor of M/s Associated Refractory and Minerals, that their firm is working since last 10 years on rent and as per his knowledge M/s Subrat Trading Co., never existed at the said premises (RUD- 150A)	Summons was returned undelivered with remark "No such Firm" (RUD-150B)
47	07BLZPT9351G1Z5 Tiwari Trading Company Out of Kh. No. 12/26, Village, Budhpur, Bijapur, Delhi, 110036	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-151A)	Summons was returned undelivered with remark "No such Firm" (RUD-151B)
48	07BMVPB3838H1ZR Ganpati Enterprises B-1174, Ground Floor, Gharoli, Mayur Vihar Phase III, Delhi, 110096	Another firm namely M/s Samsons Engineering (07AERPJ7375J1ZS) was present there since 2017. Never heard about M/s Ganpati Enterprises or Shri Ashish Bansal (RUD-152A)	Summons was returned undelivered with remark "No such Firm/Person" (RUD- 152B)
49	07BNOPG2623R1ZH Vikas Trading Company 21/10, 11/1, 11/3, 12/1, 12/3, C-132,	No such firm exists at the said premises, and no business activity noticed from the said shop (RUD-153A)	Summons was returned undelivered with remark "No such Firm" (RUD-153B)



	Gali No. 6, Main Road, Harit Vihar, Burari, Delhi, 110084		
50	07BRDPR1489K1Z9 Raghav Traders H. No. 183, 1 st Floor, Naraina, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-154A)	Summons was returned undelivered with remark "No such Firm" (RUD-154B)
51	07BTTPK2984C1ZB Barfani Traders Flat No. 70, 1 st Floor, Near Laxmi Narayan Mandir, Guru Hari Kishan Nagar, Paschim Vihar, Delhi, 110041	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-155A)	Summons was returned undelivered with remark "No such Firm" (RUD-155B)
52	07BULPK5077P1ZS Mahalaxmi Fabrics 18, East Azad Nagar, Delhi, 110051	No such firm exist at the said address or in nearby locality (RUD-156A)	Summons was returned undelivered with remark "No such Firm" (RUD-156B)
53	07BUXPR3104A1ZO Rajesh Packaging Materials 988A, Shop No. 2, Sir Chhotu Ram Marg, Raj Nagar, II, Palam Colony, Delhi, 110077	No such firm exist at the said address or in nearby locality (RUD-157A)	Summons was returned undelivered with remark "No such Firm" (RUD-157B)
54	07BVSPC0480N1Z6 Choudhari Traders Off. No.36/A, Near Sunil Medicos, Najafgarh Dhansa Road, K, Block, Gopal Nagar, Najafgarh, Delhi, 110043	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-158A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-158B)
55	07BXQPN0974E1Z5 Pitambar Packaging Shop in Plot No.13/3, Ground Floor, Back Side, Kapashera, Delhi, 110037	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-159A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-159B)
56	07BYLPB0493C1ZQ Pramod Traders Plot No. 223, Kh. No. 958, 1 st Floor, Block-C, Village Siraspur, Raja Vihar, Delhi, 110042	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-160A)	Summonswasreturnedundeliveredwithremark"InsufficientAddress"(RUD-160B)
57	07BYUPA7776E1ZY Maruti Trading Company H. No. RZ-77, First Floor, Maruti Trading Company, Uttam Nagar, Delhi, 110059	Shri Krishan Lal (9650652211) owner of the premises informed that he has been residing there since 1980 and never rented out first floor to any person or such firm (RUD-161A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-161B)
58	07BYXPK7566D2ZQ Unique Traders A-228, Landmark Na Shaheed Sukhdev Nagar, Wazirpur Industrial Area, Delhi, 110052	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-162A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-162B)
59	07BZNPJ1724R1ZR Swastik Enterprises A-45, Block-A, Wazirpur Industrial Area, Wazirpur, Delhi, 110052	Screenshot showing the Suo moto cancellation is being initiated on the basis of Taxpayer was not found in existence during the physical verification (RUD- 163A)	Summons was returned undelivered with remark "No such Firm" (RUD-163B)
60	07CBGPT7205K1ZA Tradezone Enterprises	No firm is found present at the said premi Further, SCN for cancellation was issued b and hence GSTIN was cancelled <i>suo-moto</i>	out party did not comply



	A-55-56, L/G/F, Madhu Vihar Market Main Road, Delhi, 110092		
61	07CBHPR7202R1Z0 Sameer Trading Company H. No. B-278-A, Ground Floor Shop, Tigri Extension, New Delhi, 110019	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-165A)	Summons was returned undelivered with remark "No such Firm" (RUD-165B)
62	07CDCPK2241L2ZM H K Enterprises A-188, Naraina Industrial Area, Phase-I, Delhi, 110028	Shri Rakesh Sachdeva, President of Naraina Industrial Association Phase-I & II, informed that there is no such address in Naraina Industrial Association Phase- I and confirmed that no unit in the name of M/s H.K. Enterprises is existing as per the record (RUD-166A)	Summons was returned undelivered with remark "No such Firm" (RUD-166B)
63	07CEXPV6488L1Z0 Shayam Impex 1824/2, Main Rajouri Garden, Delhi, 110027	The GSTIN of the firm was cancelled <i>suo-</i> <i>moto</i> being the address/firm both were not located (RUD-167A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-167B)
64	07CFAPT7827M1ZS Jai Bhawani Traders A-563, Naraina Industrial Area, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-168A)	Summons was returned undelivered with remark "No Such Person" (RUD-168B)
65	07CGJPD1778B1ZM Mehul Enterprises 70/60, Ground Floor, Near Ice Factory, Mangolpur Kalan, Delhi, 110085	SCN was issued to the party for cancellation of GSTIN because the party had not complied the provisions of GST Act (RUD-169A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-169B)
66	07CGLPN7896N3Z4 Niraj Enterprises ZC/281, Near MCD Office, Naraina, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-170A)	Summons was returned undelivered with remark "Insufficient Address" (RUD-170B)
67	07CICPC2115G1ZY Durga Enterprises C-209, Ramadhar, Naraina Industrial Area Phase-1, Naraina, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-171A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-171B)
68	07CLMPP0929C1Z3 Satyanarayan Traders RZF, 954-C, Raj Nagar, Part-II, Palam Colony, Delhi, 110077	No such firm ever exists at the said address or in the nearby locality (RUD-172A)	Summons was returned undelivered with remark "No such Firm" (RUD-172B)
69	07COQPP0478H1ZF Gokul Enterprises H-83, Vijay Vihar, Phase-II, Rohini, Delhi, 110085	The shop was under the name of M/s Kaushik Property Consultant (Shri Ram Niwas Kaushik 9312929703). Shri Ram Niwas Kaushik informed that he rented out the premise to M/s Gokul Enterprise before 02 years ago, but he left the premise within 02 months (RUD-173A)	Summons was returned undelivered with remark "No such Firm" (RUD-173B)
70	07CUMPP6915P1ZO Ganapati Enterprises C-34, Ground Floor, Kh. No. 12/13, Aman Puri, Nangloi, Delhi, 110041	The premises was a residential premise and found closed neighbors informed that no such firm or business activity ever noticed at the said premises (RUD- 174A)	Summonswasreturnedundeliveredwithremark"InsufficientAddress"(RUD-174B)



	07DDTPK9495L2ZA		
71	Kavita Industries MB-42/2, 2 nd Floor, Plot No. 12, Master Block, Gali No. 2, Shakarpur, Delhi, 110092	The premises was a residential premise, and no such firm ever exists at the said premises (RUD-175A)	Summons was returned undelivered with remark "No such Firm" (RUD-175B)
72	07DFRPM5804P1ZM A M Enterprises H. No. 1954, Ground Floor, Near Mohan Das, Narela Village Pana Mamaupur, Delhi, 110040	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-176A)	Summons was returned undelivered with remark "Address couldn't be located" (RUD-176B)
73	o7DFZPG1472M1ZQ Gupta Traders Off No. 129-B, Near Roshan Garden, Shivaji Road, Masudabad Najafgarh, Delhi, 110043	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-177A)	Summonswasreturnedundeliveredwithremark"InsufficientAddress"(RUD-177B)
74	07DHOPP9901H1ZT Dinesh Enterprises B-54, 2 nd Floor, Kh No. 743/629/58, West Jyoti Nagar, Delhi, 110094	The GSTIN was cancelled because at the time of field visit by the officer the premise was not found (RUD-178)	Summons was returned undelivered with remark "No Such Person" (RUD-178B)
75	07DHRPR6682G1ZI Mahaveer Industries AG 88-D, Vikashpuri, Delhi, 110018	Shri Bacitar Pal Singh owner of the premise informed that they used said premise for residential purpose and never let the same to M/s Mahaveer Industries (RUD-179A)	Summons was returned undelivered with remark "No such Firm" (RUD-179B)
76	07DIOPP3069P1ZA Sitakant Trading Co. A-61, Jain Park, Gali No5, Uttam Nagar, Delhi, 110059	The sign board of M/s Sitakant Trading Co., was placed but Shri Prem Pratap, caretaker of the property informed that the ground floor of the said premises was given to M/s Sitakant Trading Co., but they left the premise, and no business activity was seen from the said premise (RUD-180A)	Summons was returned undelivered with remark "No such Firm" (RUD-180B)
77	07DLXPG8767F1ZA Gita Enterprises H. No. SRS/73, 1 st Floor, National Market, Naraina Opp. PNB Bank, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-181A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-181B)
78	07DOOPA4777P2Z3 Gupta Enterprises 148/151, Ground Floor, Ram Nagar, Qutub Road, Delhi, 110055	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-182A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-182B)
79	07DOOPG0973R1Z4 Gupta Enterprises F-29590/2, Ground Floor, Balbir Nagar, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-183A)	Summons was returned undelivered with remark "No such Firm" (RUD-183B)
80	07DOPPR4508E1ZO Subham Warpers Plot No. 92, Front Side, 1 st Floor, Shamshan Ghat Road, Bijwasan, Delhi, 110061	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-184A)	Summons was returned undelivered with remark "No such Firm" (RUD-184B)
81	07DRBPK8521B2Z3 Kumar Enterprises	The president of Naraina Industrial Area informed that the address is incorrect,	Summons was returned undelivered



	H.No. 4, 3 rd Floor, Ph-I, Community Centre, Naraina Industrial Area, Delhi, 110028	and no such firm exists in Naraina Industrial Area (RUD-185A)	with remark "No such Firm" (RUD-185B)
82	07DSUPA3132C1Z2 Universal Traders Khasra No 761, Ground Floor, Landmark Khreah Road, Near Hanuman Mandir, Village Siraspur, Delhi, 110042	No such firm exist at the said address or in nearby locality (RUD-186A)	Summons was returned undelivered with remark "No such Firm" (RUD-186B)
83	07DVRPK7541H1Z2 Jagdamba Enterprises 265, Ground Floor, Pratap Khand, Vishwakarma Nagar, Jhilmil Colony, Delhi, 110095	Firm exists for some time at the said premises. However, no business activity noticed (RUD-187A)	Summons was returned undelivered with remark "No such Firm" (RUD-187B)
84	07DXHPS1755R1ZJ Singh Enterprises H.No126, Block-C, Ph-I, Naraina Industrial Area, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-188A)	Summons was returned undelivered with remark "No such Firm" (RUD-188B)
85	07EFTPR2472K1ZM Rajkishore Trading Shop No. 5, VPO Shahbad, Daulatpur, Delhi, 110042	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-189A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-189B)
86	07EFZPS6397G1Z8 Sharma Enterprises 3 rd 08Floor, 341 A/95, Gali, No, 13, Shalimar Park Extension, Bholanath Nagar, Shahdara, Delhi, 110032	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-190A)	Summons was returned undelivered with remark "No such Firm" (RUD-190B)
87	07EHSPP9216E1ZU Pradhan Trading Co Shop No.3, Ground Floor, Shri Parasnath Jain Complex, 10/1 and 10/2, Khasra No. 33/19, Dharam Colony, Nangloi, Delhi, 110041	Shri Kuldeep Dalal owner of M/s Shri Ram Properties informed that since 2019 he never seen any firm in the name of M/s Pradhan Trading Co. running from the said premise (RUD-191A)	Summons was returned undelivered with remark "No such Firm" (RUD-191B)
88	07EKFPS8144Q1Z7 BSA Industries 188, GF City Paper Fie, Industrial Area, Patparpar Ganj, Near Showroom Honda, Delhi, 110092	Smt. Manju Rani Mittal informed that M/s Vinpak Projects & Marketing Pvt. Ltd., and M/s Surge Systems India Pvt. Ltd., are established since July 2017, and never rented out the said premises to M/s BSA Industries (RUD-192A)	Summons was returned undelivered with remark "No such Firm" (RUD-192B)
89	07EUIPP4391D1ZD Shiv Shakti Enterprises Plot No. 223 Kh. No. 958, Ground Floor, Landmark Near Shiv Mandir, Block-C Raja Vihar, Village Siraspur, Delhi, 110042	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-193A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-193B)
90	07EULPS3748N1ZN Rajasthan Udyog Ground Floor, H.No404 New 140, Street No 15, Village Jagatpur, Near Kartar Vatika, Delhi, 110084	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-194A)	Summons was returned undelivered with remark "Address couldn't be located" (RUD-194B)
91	07EUXPK1745P1ZM JK Trading Co.	There were 4 adjacent houses having same number i.e., P-14. On being asked	Summons was returned undelivered



	P-14, Ground Floor, Vijay Vihar, Uttam Nagar, Delhi, 110059	about M/s J.K. Trading Co. and its Proprietor Shri Jitendra Kumar, they all responded that they never rented out their premises to M/s J.K. Trading Co. or Shri Jitendra Kumar and informed that their premises have never been used by any person to run his company (RUD- 195A)	with remark "No such Firm" (RUD-195B)
92	07EWAPS6954P1ZK Jyoti Traders A-175, Naraina Industrial Area, Phase- 1, Naraina, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-196)	Statement of Shri Rajesh Kumar Singh
93	07EWAPS6954P3ZI Soham Marketing H. No126, Block, C, Naraina Ph-1, Naraina, Delhi, 110028	Shri Jasmeet Singh (9818236793) owner of the said premise informed that no firm in the name of M/s Soham Marketing or Shri Rajesh Kumar had ever taken any portion of the said premise on rent (RUD-197)	was recorded wherein he deposed that the firm was created (RUD-289)
94	07EXWPS6748Q1ZU Concept Khasra No. 13/6/1, Gali No.5, Opp Radha Krishna Mandir, Village Jagat Pur Delhi, Delhi, 110084	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-198A)	Mr. Suresh Chander informed that F-23, Street No.6, Wazirabad, Burari Delhi-110084 is his residential address and he does not know Mr. Surender Singh or M/s Concept (RUD-198B)
95	07EYTPR0862L1ZJ Starnx Enterprises X/437, 1 st Floor, Mohalla Ram Nagar, Gali O, Mohalla Ram Nagar, Delhi, 110031	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-199A)	Summons was returned undelivered with remark "No such Firm" (RUD-199B)
96	07FEZPS1061B1Z8 Surya Enterprises D 7/3, F-Block, Pocket X, Okhla Phase II, Okhla Industrial Area, Delhi, 110020	The address is insufficient/incorrect, and the firm was not traceable. However, one D-7/3 was identified in Okhla Phase II, and on being asked with the owner it had been gathered that they never rented out the said premise M/s Surya Enterprises (RUD-200A)	Summons was returned undelivered with remark "No such Firm" (RUD-200B)
97	07FFZPS9040K3ZA Shree Jee Traders Shop at 121, Beena Enclave, Nangloi, Delhi, 110041	The firm was indulged in fraudulent activity hence the GSTIN was suspended (RUD-201A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-201B)
98	07FIFPK1036L1Z7 KC Laminates E-1/407, Shivram Park, Nangloi, Delhi, 110041	Shri Kuldeep Sharma nephew of owner informed that the shop was given on rent nearly 6 months ago. However, no business activity was carried out by M/s KC Laminates from the said premise (RUD-202A)	Summons was returned undelivered with remark "No such Firm" (RUD-202B)
99	07FIQPK9390J1ZB Mahadev Enterprises C-11, Block-C, Loni Road, Jyoti Nagar, Shahdara, Delhi, 110094 Directorate General of Goods and Services To	The GSTIN was cancelled because at the time of field visit the taxpayer was found non-functioning/not existing at the premise (RUD-203A)	Summons was returned undelivered with remark "No such Firm" (RUD-203B) Page 68 of 230



100	07FOZPP2803G1ZG Pandit Traders Plot No. RZ-536, Kh No. 29/18, 1 st Floor, Gopal Nagar, Near Pasta Hutt, Maharshi Dayanand Marg, Najafgarh, Delhi, 110043	Smt. Urmila informed that she has been residing at the said premise with his family since 1198, and informed that she never rented out the said premise to any such firm (RUD-204A)	Summons was returned undelivered with remark "No such Firm" (RUD-204B)
101	07FRMPR1240D1ZU Pandit Traders E-368, Naraina Industrial Area, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-205A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-205B)
102	07FUMPM7409E1ZC Shine International 180 E-2, Street No. 0, Bhola Nath Nagar, Shahdara, Delhi, 110032	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-206A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-206B)
103	07FUWPS2084H1ZT Ashoka Industry Plot No. 22, Pole No. 44, Sita Puri Dabri Palam, Delhi, 110045	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-207A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-207B)
104	07FXVPM4565H1ZO Vishnu Traders B-83, New-165, Rd No. 7, Andrews Ganj, Delhi, 110049	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-208A)	Summons was returned undelivered with remark "No such Firm/Person" (RUD- 208B)
105	07GPTPP4897E1ZX J P Enterprises 230/5-B, Ground Floor, Railway Colony, Mandawali Fazalpur, Delhi, 110092	At the said address one M/s Baba Dairy is running since last 05 years, and never heard about M/s J P Enterprises or Shri Jeevan Pariyar (RUD-209A)	Summons was returned undelivered with remark "No Such Firm" (RUD-209B)
106	07GWEPK9683R1ZA Lalit Enterprises H. No. 265, Pocket-12, Vijay Vihar, Bhagwan Vishwakarma Marg, Park, Sector 5, Rohini, Delhi, 110085	The GSTIN was cancelled because party had issued invoices without supply of goods and/or services in violation of the provisions of this Act, (RUD-210A)	Summons was returned undelivered with remark "No Such Firm" (RUD-210B)
107	07HDEPD4213G1ZY Singh International 34038/235, Shiv Market, Janakpuri, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-211A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-211B)
108	07HDSPK6418J1ZV Krishna Traders Shop No. G-3, Plot No. 4, Gupta Arcade LSC, Shrestha Vihar Near Dav Public School, Delhi, 110092	There are many shops at the said address, but shop number was not mentioned. Further, on being asked with local shopkeepers, they informed that never heard about M/s Krishna Traders or Shri Krishan Kumar (RUD-212A)	Summons was returned undelivered with remark "No such Person" (RUD-212B)
109	07HGSPK6058R1Z5 Kailash Enterprises H. No 76, Shop No1, Abchal Nagar, Nilothi Chander Vihar, Nangloi, Delhi, 110041	Mr. Gulshan Guliyani owner of the premise informed that the premises was rented to M/s Kailash Enterprises, for the period 28.10.2019 to 27.09.2020 (RUD- 213A)	Summons was returned undelivered with remark "No such Firm" (RUD-213B)



07HINDK0180N177		Summons was
Seaborne Creations 30/62, Main 100 Foot Road, Gali No. 8, Vishwas Nagar, Shahdara, Delhi, 110032	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-214A)	returned undelivered with remark "Incomplete Address" (RUD-214B)
Shiv International B-310, 3 rd Floor, Rectangle One D3, PVR Select City Walk, Saket, Delhi, 110017	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-215A)	Summons was returned undelivered with remark "No such Firm/Person" (RUD- 215B)
Prasad Enterprises H. No.8-A, Chanchal Park, Gurdayal Vihar, Nangloi, Delhi, 110041	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-216A)	Summons was returned undelivered with remark "No such Firm" (RUD-216B)
07HKJPS1195G1ZO Shree Shyam Trading Company H. No. 5, Gali No. 1, Ground Floor, Khasra No. 235, Mukandpur Extn., Delhi, 110042	The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-217A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-217B)
07ICLPK7543H1Z4 Shree Ji Enterprises Ground Floor, C-120, Okla Vihar, Jamia Nagar, Delhi, 110025	SCN dated 27.12.2021 was issued wherein it was reported that the Taxpayer found non-functioning/Not Existing at the Pr. Place of business, but no reply was received and hence, the GSTIN was cancelled vide order dated 06.01.2022 <i>w.e.f.</i> 27.12.2021 (RUD-218)	Summons was returned undelivered with remark "Insufficient Address" (RUD-217B)
07IQCPS2541L4ZC Gee Key Sales H. No. 126, Block-C, Ph-I, Naraina Industrial Area, Delhi, 110028	The locals informed that no firm in the name of M/s Gee Key Sales ever operated from the said premise (RUD-219A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-219B)
07IUPPK3177P1ZK Rudra Enterprises Plot No. H 1, Shop No. 103, Garg Tower Neta Ji Subhash Place, Pitampura, Delhi, 110034	M/s SKM Education Pvt. Ltd., is running from the said address. Shri Kumar Pillai, Director of M/s SKM Education Pvt. Ltd., informed that Ms. Poonam Diman is the owner of the premises, and he has taken the same on rent since Sept. 2023. Sh. Pankaj at G/F of the building informed that a firm namely M/s Anukul Agrotek owned by Sh. Gopal Goenka was in existent at the given address however, no firm namely M/s Rudra Enterprises was ever in existence at the given address in recent 2-3 years (RUD-220A)	Summons was returned undelivered with remark "No such Firm" (RUD-220B)
07IVWPK9323M1ZH Ravi Kumar Laminates Kh-398, Ground Floor, Shahbad, Daulatpur, Delhi, 110042	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-221A)	SummonswasreturnedundeliveredwithremarkwithoutAddress"(RUD-221B)
07IWOPS8094E1ZM Empire Traders H.No168, Ground Floor, Plot No3, Kh. No. 37/16, Saboli Road Sanjay Colony, Narela, Delhi, 110040	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-222A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-222B)Page 70 of 230
	30/62, Main 100 Foot Road, Gali No. 8, Vishwas Nagar, Shahdara, Delhi, 110032 07HJCPD2205L1ZG Shiv International B-310, 3 rd Floor, Rectangle One D3, PVR Select City Walk, Saket, Delhi, 110017 07HJJPS0550Q1ZG Prasad Enterprises H. No.8-A, Chanchal Park, Gurdayal Vihar, Nangloi, Delhi, 110041 07HKJPS1195G1ZO Shree Shyam Trading Company H. No. 5, Gali No. 1, Ground Floor, Khasra No. 235, Mukandpur Extn., Delhi, 110042 07ICLPK7543H1Z4 Shree Ji Enterprises Ground Floor, C-120, Okla Vihar, Jamia Nagar, Delhi, 110025 07IQCPS2541L4ZC Gee Key Sales H. No. 126, Block-C, Ph-I, Naraina Industrial Area, Delhi, 110028 07IUPPK3177P1ZK Rudra Enterprises Plot No. H 1, Shop No. 103, Garg Tower Neta Ji Subhash Place, Pitampura, Delhi, 110034	Seaborne Creations 30/62, Main 100 Foot Road, Gali No. 8, Vishwas Nagar, Shahdara, Delhi, 110032 07HJCPD2205LIZG Shiv International B-310, 3rd Floor, Rectangle One D3, PVR Select City Walk, Saket, Delhi, 110007 07HJJPS0550Q1ZG Prasad Enterprises H. No.8-A, Chanchal Park, Gurdayal Vihar, Nangloi, Delhi, 110041 07HKJPS1195G1ZO Shree Shyam Trading Company H. No. 5, Gali No. 1, Ground Floor, Khasra No. 235, Mukandpur Extn., Delhi, 110042The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-216A)07IL/PK7513JG1ZO Shree Shyam Trading Company H. No. 5, Gali No. 1, Ground Floor, Khasra No. 235, Mukandpur Extn., Delhi, 110042The address is incomplete/incorrect, and the firm was not traceable in nearby locality (RUD-216A)07ICLPK7543H1Z4 Shree Shyam Trading Company H. No. 26, Block-C, Ph-I, Naraina Industrial Area, Delhi, 110025The locals informed that no firm in the name of M/s Gee Key Sales ever operated from the said address. Shut Kumar Pillai, Director of M/s SKM Education Pvt. Ltd., is running from the said address. Shut Kumar Pillai, Director of M/s SKM Education Pvt. Ltd., informed that Na. Poonan Diman is the owner of the premises, and he has taken the said address. Shut Kumar Pillai, Director of M/s SKM Education Pvt. Ltd., informed that a firm namely M/s Auukul Agrotek wore of the premises, and he has taken the said address. Shut Kumar Pillai, Director of M/s SKM Education Pvt. Ltd., informed that a firm namely M/s Rudra Enterprises was ever in existence at the given address in existence at the given addre



Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit F.No. DGGI/INV/GST/1757/2021/GRU

	07JECPK2475G1ZD		Summons was
	Vikas Traders	The address is incomplete/incorrect, and	returned undelivered
119	Off No. 11, Near GST Support Center,	the firm was not traceable in the nearby	with remark
119	Sarakpur Road, Prem Nagar, Delhi,	locality (RUD-223A)	"Incomplete Address"
	110043		(RUD-223B)
	07JKVPS7810G1ZC		Summons was
	K.N. Traders	The address is incomplete/incorrect, and	returned undelivered
120	H. NoSRS-73, 1 st Floor, National	the firm was not traceable in the nearby	with remark
	Market Naraina, Opposite PNB Bank,	locality (RUD-224A)	"Incomplete Address"
	Naraina, Delhi, 110028		(RUD-224B)
	07JVRPK7522Q1ZG	The GSTIN of the firm was cancelled <i>suo</i> -	Summons was
121	Shiv Sales	<i>moto</i> . A local enquiry confirmed that no	returned undelivered
	9/3638, Ground Floor, Shanti	such firm ever exist at the said address	with remark "No Such
	Mohalla, Gandhi Nagar, Delhi, 110031	(RUD-225A)	Firm" (RUD-225B)
	07KLOPS9373D1Z8	The locals informed that no firm in the	Summons was
122	Phonix Traders	name of M/s Phonix Traders ever	returned undelivered
	WZ-48, Shakurpur Village, Opposite	operated from the said premise (RUD -	with remark "No Such
	M-Block, DDA Market, Delhi, 110034	226A)	Firm" (RUD-226B)
	07KUSPK7859B1ZV Jay Trading Co.	The address is incomplete/incorrect, and	Summons was returned undelivered
123	FT-2909/20, 20 Feeta Road, Seelam	the firm was could not be located in	with remark "No Such
	Pur, Delhi, 110028	nearby area (RUD-227A)	Firm" (RUD-227B)
	07KXYPK9568J1Z0	The GSTIN of the firm was cancelled <i>suo-</i>	
	Satyam Enterprises	<i>moto</i> being issues any invoice or bill	Summons was
124	H. No. A69-A, 2 nd Floor, South Ganesh	without supply of goods and/or services	returned undelivered
•	Nagar, Gali No. 4 Near Gupta General	in violation of the provisions of this Act	with remark "No Such
	Store, Delhi, 110092	(RUD-228A)	Person" (RUD-228B)
	07LEGPK5418H1Z8	The GSTIN of the firm was cancelled <i>suo-</i>	Summons was
	Singh Enterprises	moto being issues any invoice or bill	returned undelivered
125	G-14/5, Shop No. 18, Subhas Nagar,	without supply of goods and/or services	with remark "Left
	Delhi, 110027	in violation of the provisions of this Act	without intimation"
		(RUD-229A)	(RUD-229B)
	07LEGPK5425N1ZW	The GSTIN was cancelled because at the	Summons was
126	Micro Traders	time of field visit the taxpayer was found	returned undelivered
	Gali No. 15/12, MCD Office, Rajouri Garden, Delhi, 110027	non-functioning/not existing at the premise (RUD-230A)	with remark "No Such Firm (RUD-230B)
	Garuell, Dellil, 11002/	Shri Jai Kishan Saini, owner of the	rnm (KUD-230D)
		premises informed that he is running a	
		business of tent house from the said	
		premises and has rented out a shop of	
		size approximately 8*11 feet to a person	
	07LLYPS5428N1ZO	whose number is 8429549993. On being	Summons was
	Kumar Trading Company	called on the said number which was	returned undelivered
127	H. No. A-37, Shiv Bucks Park, Nagloi,	picked by a person and provided the	with remark "No Such
	Delhi, 110041	mobile number '8260284063' of Kumar	Firm" (RUD-231B)
		Sir, and on contacting the said number	
		the same was found switched off. Shri Jai	
		Kishan Saini further informed that they	
		1	
		have never seen any business activity	
		from the said premise (RUD-231A)	
128	07LVWPS1348M1ZD Shivanju Traders		—



	A-3/3, 1 st Floor, Paschim Vihar, Near B-2 Blk, DDA Market, Delhi, 110063	the said premises and they never heard abo firm (RUD-232)	out the above-mentioned
129	07NDAPS2698L1ZL Singh Traders Off No. 253/74, Near Hanuman Mandir, Bijwasan Rd, Mahipalpur, Delhi, 110037	The taxpayer was found non-existent verification and mobile number switched <i>moto</i> cancelled (RUD-233)	
130	07OHZPS8032L1ZZ Salasar Enterprises 38309, Main Market, Najafgarh, Delhi, 110028	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-234A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-234B)
131	07OIBPS3345R1ZA Nitin Trading House Kh No 33/8/3, Ground Floor, Village Zindpur, Near Shiv Mandir, Delhi, 110036	The Shiv Mandir in the village-Zindpur had located. But the said address was not located and no whereabouts the firm or address was located (RUD-235A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-235B)
132	07OPNPS8612L1ZS Gupta Enterprises 9092, Shiv Chowk, New Market Chawri Bazar, Delhi, 110020	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-236A)	Summons was returned undelivered with remark "No Such Firm" (RUD-236B)
133	07OWUPS4414J1ZJ Saraswati Enterprises Plot No. 118A, C-J, Kherki Extension, Saket, Delhi, 110017	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-237A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-237B)
134	08AMFPB9365E1Z2 Ravi Kumar Suppliers S-225, 2 nd Floor, Mangalam Fun Squire Durga Nursery Road, Udaipur, 313003	The State GST authority has conducted physical verification of Pr. Place of Business and it was informed by the owner of the premise that the shop was given on rent in September 2019 to M/s Ravi Kumar Suppliers but office was not opened by him hence they rented the said premise to M/s Science Club in March 20 (RUD- 238)	
135	09AGCPC4247K1ZF Chauhan Traders 17-B, G/F, Co-operative Industrial Area, Udyog Nagar, Kanpur, U.P., 208022	Other shopkeepers of the said compound informed that no Such firm ever exists in the said premise (RUD-239A)	Summons was returned undelivered with remark "No Such Firm" (RUD-239B)
136	09AIAPN1026D1ZT Nayak Trading Company Bakshi Ka Talab, Ramendra Vihar Colony, Lucknow, U.P., 226002	The locals informed that no firm in the name of M/s Nayak Trading Company ever operated in Ramendra Vihar, Bakshi Ka Talab (RUD-240A)	Summons was returned undelivered with remark "No Such Firm" (RUD-240B)
137	09AJRPP5579P1ZT Shiva Enterprises 84/113, Keshav Bhawan, Carwalo Nagar, Kanpur Nagar, U.P., 208003	Shri Ram Kishore Vajpai (9838923940) informed that his wife Smt. Nita Vajpai rented the said premise to Shri Tulsi Prasad Prop. of M/s Shiva Enterprises. However, as per his information no goods were received or supplied from the said premise (RUD-241A)	Summons was returned undelivered with remark "No Such Firm" (RUD-241B)
138	09ANOPN1634L1ZI K C Laminates Office No. B-4, 80/17, 1 st Floor, Jagat Singh Complex, Gurudwara Road, Naka Hindola, U.P., 226004	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-242A)	Summons was returned undelivered with remark "No Such Firm" (RUD-242B)



139	09ARMPJ4078Q1ZU Chandan Trading Company Bhakhamau Behata, Paikaramau, Lucknow, U.P., 227202	SCN dated 10.07.2020 was issued wherein it was reported that taxpayer was not found functioning on declared business place, but no reply was received and hence, the GSTIN was cancelled vide order dated 18.07.2020 (RUD-243A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-243B)
140	09AVKPN6952D1Z8 Rabindra Laminates 132/717-A, Munshipurwa, Near Transport Nagar, Kanpur Nagar, U.P., 208023	Smt. Vijay Lakshmi owner of the premise informed that they rented the 8*10 feet area of the said premise to M/s Rabindra Laminates. Once he visited the premise for keeping chairs and plastic role. But after that no goods ever received or supplied from the said premise (RUD- 244A)	Summons was returned undelivered with remark "No Such Firm" (RUD-244B)
141	09AZOPB7727N1ZO Manoj Laminates Sales Magath Asthi Road Bagdi, Tehsil, Bakshi Ka Talab, Lucknow, U.P., 226201	The locals informed that no firm in the name of M/s Manoj Laminates Sales ever operated at Magath Asthi Road Bagdi (RUD-245A)	Summons was returned undelivered with remark "No Such Firm" (RUD-245B)
142	09BDOPP0550N1ZZ Vijay Sales Plot No. 30, G-5, D N Singh Complex, Maharshi Nagar, IIM Road, Lucknow, U.P., 226013	The locals informed that no such firm exists at D N Singh Complex, Maharshi Nagar, IIM Road, Lucknow (RUD- 246A)	Summons was returned undelivered with remark "No Such Firm" (RUD-246B)
143	09BKYPD3812J1ZR Lavanya Trading Co. Shop No. 3, Gandhi Nagar, Kanpur, U.P., 208001	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-247A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-247B)
144	09BNIPV2084B1ZU S.V. Traders Shop No. B-1/B-2, Dheeman Complex Bijnour Road, Sarojani Nagar, Lucknow, U.P., 226008	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-248A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-248B)
145	09BTDPM7832B1ZQ Unique Services H. No413/4, Ground Floor, Gazipur Near School Lane, Gazipur, U.P., 110092	The address is incomplete/incorrect, and the firm was not traceable in the nearby locality (RUD-249A)	Summons was returned undelivered with remark "No Such Firm" (RUD-249B)
146	09CECPK3695F1ZA Anurag Sales B-322-A, Nandi Kunj Nandgram, Ghaziabad, U.P., 201003	Mr. Abhinav Jain owner of the premise that he is using the said premise for residential purpose and never rented out to M/s Anurag Sales (RUD-250A)	Summons was returned undelivered with remark "No Such Firm (RUD-250B)
147	09CJBPB4851J1Z8 Tushar Laminates Sales Plot No CP-03, Mishrapur, Lucknow, U.P., 209870	The address is incomplete/incorrect, and the firm was could not be located in nearby area (RUD-251A)	Summonswasreturnedundeliveredwithremark"IncompleteAddress"(RUD-251B)
148	09COMPA0461D1ZB Vikram Sales Plot No17, Kh No58, IIM Road, Semra Gaudi, Lucknow, U.P., 226020	Shri Hari Mohan Gupta (9839959399) owner of the premises informed that he rented out the shop in the said premises to M/s Vikram Sales for the period July 2020 to April 2021. However, no	Summons was returned undelivered with remark "No Such Firm" (RUD-252B)



		business activity noticed by the same	
149	09COXPK7095E1Z4 Singha Enterprises G-3/183, Arogya Hospital, Vaishali Sector 6, Ghaziabad, U.P., 201014	(RUD-252A) The security guard and others informed that no such firm ever exists at the said premise (RUD-253A)	Summons was returned undelivered with remark "No Such Firm" (RUD-253B)
150	09CVFPR9246F1Z2 Ripu Trading Company 6/7, Labour Colony, Dada Nagar, Kanpur Nagar, U.P., 208022	Shri Alok Shukla (9839379379) owner of the premise informed that he executed rent agreement with M/s Ripu Trading Company through one person Shri Madan (7790000587, 77900000580). Shri Madan used to pay rent. But no business activity was noticed from the said premise, and they also not paid rent to him and vacate the premise without intimation (RUD-254A)	Summons was returned undelivered with remark "No Such Firm" (RUD-254B)
151	09DDRPG1575H1Z5 Dev Warapers Shop No. 3, LGF, Sai Star Complex, Sitapur Road, Mohibullapur, Lucknow, U.P., 226021	Shri Anand Mishra (9889463181) owner of the premise informed that he executed rent agreement on 26.11.2019 with M/s Dev Warapers through one person Shri Madan (7790000587, 77900000580). Shri Madan used to pay rent. Other shop keepers informed that no business activity was noticed from the said premise (RUD-255A)	Summons was returned undelivered with remark "No Such Firm" (RUD-255B)
152	09DHFPD7637M1ZU Naresh Sales Shop No07, Bhakhamau, Bhakhamau Kursi Road, Lucknow, U.P., 226021	SCN & Order issued for Cancellation of GSTIN of Naresh Sales (RUD-256A)	Summons was returned undelivered with remark "Incomplete Address" (RUD-256B)
153	09DLHPR6532R1Z3 Kritika Trading Co. Telephone Exchange, Sonda Road, Murad Nagar, Ghaziabad, U.P., 201206	The address is incomplete/incorrect, and the firm was could not be located in nearby area (RUD-257A)	Summons was returned undelivered with remark "No Such Firm" (RUD-257B)
154	09EAVPB1764H1ZC Sagar Trading Company Bakshi Ka Talab, Village Mastipur, Mohanlalganj, Lucknow, U.P., 227300	The locals informed that no firm in the name of M/s Sagar Trading Company ever operated in Village Mastipur (RUD- 258A)	Summons was returned undelivered with remark "No Such Firm" (RUD-258B)
155	09EFZPK0434N1ZN Prashant Trading Company Shop No- FF-09, Arcate-1, IIM Road, Eldeco City, Lucknow, U.P., 226016	The GSTIN was canceled vide order 14.01.2021 <i>w.e.f.</i> 29.12.2020 reason being the AC (SIB) Range-C, Lucknow reported that during investigation on 28.12.2020 the firm was found non-existent at the declared business place (RUD-259)	Summons was returned undelivered with remark "No Such Firm" (RUD-259B)
156	09ERSPB1888L1ZY Prashanta Laminates A/F-21, 2 nd Floor, Parking No. 2, TP Nagar, Kanpur Road, Lucknow, U.P., 226023	M/s Vergo UAP Farma Pvt. Ltd., is working since 2016 and no firm in the name of M/s Prashanta Laminates is working from the said premise (RUD - 260A)	Summons was returned undelivered with remark "No Such Firm" (RUD-260B)
157	09EXHPP4251A1ZJ Tanya Trading Company	Shri Rajendra Singh owner of the premise informed that he rented the said	Summons was returned undelivered



	15/2, Krishna Nagar Market, Lucknow, U.P., 226023	premise to Mr. Sitaram Panda Prop. of M/s Tanya Trading Company in August 2019. But after the rent agreement he never came and no business activity ever noticed from the said premise (RUD-261A)	with remark "तलाश करने पर पता नहीं चला" (RUD-261B)
158	09FCQPD3880Q1ZM Shivam Enterprises 6 and 7 New Chauhan Singh Market, Sitapur Road Tehsil Mod Mampur Bana, Lucknow, U.P., 226201	Shri Raghvendra Pratap informed that his father Shri Rohan Singh rented the said premise to M/s Shivam Enterprises in January 2021. However, since than the shop no. 6 & 7 have been closed and no business activity noticed (RUD-262A)	Summons was returned undelivered with remark "तलाश करने पर पता नहीं चला" (RUD-262B)
159	09HELPK0210L1ZE Navnirman Traders TC/14, 3 rd Floor, Shashtri Commercials, Vibhooti Khand, Gomti Nagar, Lucknow, U.P., 226010	The locals informed that no firm in the name of M/s Navnirman Traders, ever operated from the said premise or in nearby locality (RUD-263A)	Summons was returned undelivered with remark "तलाश करने पर पता नहीं चला" (RUD-263B)
160	09HMDPK2928B1Z5 Rohit Enterprises Ijjat Nagar Colony, Mahipat Mau, Kakori, Lucknow, U.P., 226101	The address is incomplete/incorrect, and the firm was could not be located in nearby area (RUD-264A)	Summons was returned undelivered with remark "No Such Firm" (RUD-264B)
161	09KJKPK2903P1ZH Shravan Packesing Ground Floor, Gram Barawankala, Jehta Road, Lucknow, U.P., 226101	The address is incomplete/incorrect, and the firm was could not be located in nearby area (RUD-265A)	Summonswasreturnedundeliveredwithremark"InsufficientAddress"(RUD-265B)
162	18AJUPU0082F1ZR Kamakhya Trading Co 75 Sqt, Orchid Garden, Khanmukh Jalukbari, Guwahati, 781014	The locals informed that no firm in the r Trading Co, ever operated from the said locality (RUD-266)	name of M/s Kamakhya
163	18FCMPK4971D1Z9 Khalid Traders 50Sq Feet, 1 st Floor, Sri Ram Market, Chatribari, Guwahati, Assam, 781001	The locals informed that no firm in th Traders, ever operated from the said prem (RUD-267)	-
164	22APSPC9712N1ZI Choudhary Sales Shop No-5, Block No-5, Rawabhata, Transport Nagar, Raipur, Chhattisgarh, 492003	Mr. Harvinder Singh owner of the premise informed that he is not aware about Shri Aakash Choudhary, and he never rented out his premise to M/s Choudhary Sales. He also informed that the sign on rent agreement is forged and not his sign (RUD-268A)	Summons was returned undelivered with remark "Not Known" (RUD- 268B)
165	22DGAPS4834P1ZZ Dilip Enterprises Shop No-42, Block No-07, Rawabhata, Transport Nagar, Raipur, Chhattisgarh, 492003	Mo. Imtiyaz informed that he is not aware about M/s Dilip Enterprises, and no such firm exists at the said address (RUD-269A)	Summonswasreturnedundeliveredwithremark"NotKnown"(RUD-269B)
166	23AHHPT2260P1ZY D.K. Enterprises 459 North Avenyu, Sukhliya Near Gineshwar School, Vijay Nagar, Indore, M.P., 452010	SCN dated 08.07.2022 was issued wherein taxpayer failure to furnish returns for a p no reply was received and hence, the GS order dated 10.08.2022 (RUD-270)	eriod of six months, but



	0.0 MWDM 107.4 M 170	SCN dated as an acce was issued wherei	n it was reported that in
	23AMWPM1054A1ZC	SCN dated 25.03.2022 was issued wherein	_
	Om Sai Trading Company	case, Registration has been obtained by	
167	Shop No9, TT Nagar, Pipliya Kumar	misstatement or suppression of facts, but n	
	Dewas, Near Metro Shopping Mall,	hence, the GSTIN was cancelled vide order	aated 21.04.2022 w.e.j.
	Indore, M.P., 453771	26.08.2021 (RUD-271)	·
	23APYPT1275M1Z1	SCN dated 22.06.2022 was issued wherein	
	Tomar Sales	per CTI report dealer not found and busine	
168	Kheriya Mirdha, Sandhu Market,	given business place, but no reply was i	
	Gwalior Bypass Road, Gwalior, M.P.,	GSTIN was cancelled vide order dated 04.0	7.2022 w.e.f. 29.11.2021
	474003	(RUD-272)	• • • • • • • • • • • • • • • • • • • •
	23BHFPH9745E1ZE	SCN dated 11.01.2022 was issued wherein	-
169	HR Enterprise	Pr. Place of business not found/available	
	1/2 C-01, Vayu Nagar, Bhind Road,	but no reply was received and hence, the G	
	Gwalior, M.P., 474020	order dated 21.01.2022 <i>w.e.f.</i> 22.04.2021	
	23BPJPS8789B1ZE	SCN dated 02.02.2023 was issued whereir	-
170	Kansana Enterprises	taxpayer failure to furnish returns for a p	
	6, Chota Bangadha Road, Indore,	no reply was received and hence, the GS	
	M.P., 452005	order dated 15.03.2023 <i>w.e.f.</i> 15.03.2023	
	23BPJPS8789B2ZD	SCN dated 02.02.2023 was issued wherein	_
	Dharmveer Sales	taxpayer failure to furnish returns for a p	
171	47 Jiwajiganj, Gandhi Hospital Road,	PH not attended and reply not submitte	
	Morena, 476001	hence, the GSTIN was cancelled vide order	dated 04.07.2022 w.e.j.
	asel VDKoz 49E1ZC	23.06.2022 (RUD-275)	it was reported that the
	23ELVPK9548F1ZG Kumar Traders	SCN dated 02.02.2023 was issued whereir	_
172		taxpayer failure to furnish returns for a p	
	H. No. 5, Bihari Colony, Vidisha Road, Bhanpur, Bhopal, M.P., 462038	no reply was received and hence, the GS order dated 06.03.2024 <i>w.e.f.</i> 01.07.2022	
	bhanpur, bhopai, M.1., 402030	SCN dated 02.05.2022 was issued whereir	
	23FLVPR3392P1ZX	business activity reported suspicious her	
173	Rawat Trading Company	reply, but no reply was received and	
-/5	E19, Amaltas Colony, Gole Ka Mandir,	cancelled vide order dated 02.05.2022 u	
	Gwalior, M.P., 474005	277)	
	23GQNPS5195F1Z9		~
	Ahmana Traders	SCN was issued to clarify the application	Summons was
174	30, Liladhar Colony, Vidisha Road	of cancellation, no reply was filed by the	returned undelivered
	Bhanpur Chouraha, Bhopal, M.P.,	party, hence GSTIN was cancelled vide	with remark "No Such
	462010	order dated 28.10.2021 (RUD-278A)	Firm" (RUD-278B)
		Shri Lokesh Renghe informed that one	
	27AHHPT2260P1ZQ	shop was rented to M/s D.K. Enterprises	Summons was
	D.K. Enterprises	(Prop. Shri Dharmendra Kumar Tiwari).	Summons was returned undelivered
175	H. No. 1016-A Bhandara Road, Near	Shri Lokesh Renghe also confirmed that	with remark "Not
	Ajanta Tea Company, Hansapuri,	there was no movement of goods or	Known" (RUD-279B)
	Maharashtra, 440018	storage of goods takes place (RUD-	KIIOWII (KUD-279D)
		279A)	
	36AAQPZ7304Q1ZL	SCN was issued to file furnish returns for	Summons was
	S9 Trading Co.	a continuous period of 06 months, but	returned undelivered
176	14, 1, 482, Darusalam Opp Voulga	neither return was filed nor reply was	with remark "Not
	Hotel Goshamahal Road, Hyderabad,	submitted, hence GSTIN was cancelled	Known" (RUD-
	Telangana, 500001	(RUD-280A)	280B)
	36BHEPT2410B1ZU	On being informed by the Central	
177	Surya Enterprises	Commissionerate, that address given by M	
-//	Sy No 15, 24, 25, 26, 27, Kothaguda,	vague and could not be located, hence the	
	Kondapur, Telangana, 500084	vide order dated 18.04.2024 w.e.f. 06.04.2	2023 (RUD-281)



4.4 Outcome of Statements of the Proprietors/Partners/Directors of the bogus firms/companies recorded under Section 70 of the CGST Act is discussed hereunder:

4.4.1 Statement of Shri Pramod Bansal S/o Shri Hariprakash Gupta, Proprietor of M/s P.B. Associates (07ADNPB7822K1ZC), 1/6485, East Rohtash Nagar, Shahdara, Delhi, 110032 was recorded under Section 70 of the CGST Act, 2017 on 02.07.2021 (**RUD-283**), wherein he *inter alia* deposed that,

- **i.** He is the proprietor of M/s P B Associates (07ADNPB7822K1ZC) and his wife Smt. Beena Bansal is the proprietor of M/s B B Enterprises (07ADVPB7567K1ZU).
- ii. Since July 2017, their firms started receiving tax invoices issued by M/s MEPL, without supply of underlying goods.
- iii. From July 2017 to December 2017, Shri Pramod Bansal received cash through Shri Yogeshwar Singh (Director of M/s MEPL), and the said cash was deposited by him in his and his wife's account and after deducting his commission from the said payment he transferred remaining amount to the account of M/s MEPL (11061310000131). After December 2017, the payment was received directly in his and his wife's account from different firms to which they issued tax invoices and after receipt of the payment from various accounts they transferred the same to the account of M/s MEPL.
- iv. He categorically admitted that neither good were received by him nor he made further supply of any goods along with invoices issued by their firms. He does not know at which place, the goods mentioned on the tax invoices issued by M/s MEPL, were delivered.

Outcome: M/s P B Associates (07ADNPB7822K1ZC) and M/s B B Enterprises (07ADVPB7567K1ZU) were created by Mr. Pramod Bansal in collusion with Directors of M/s MEPL. Further, the said firm was created solely for the purpose of clandestine supply of goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturer, which was shown to be supplied to M/s P B Associates on the tax invoices issued by M/s MEPL. As per bank account statement submitted by Shri Pramod Bansal huge amount of cash was deposited during the period July to December 2017 and same was immediately transferred to the account of M/s MEPL. *It had also been noticed that payment*



was made to M/s MEPL from the bank account of M/s BB Enterprises (07ADVPB7567K1ZU), whereas as per GSTR-1M of M/s MEPL, no tax invoices was issued to M/s BB Enterprises.

4.4.2 Statement of Shri Vishal Tripathy S/o Late Akhilesh Kumar Tripathy, Proprietor of M/s Proview Traders, 27/4, Ground Floor, Plot No. 27, Main G.T. Road, Dilshad Garden Industrial Area, Delhi, 110095 was recorded under Section 70 of the CGST Act, 2017 on 15.02.2022 **(RUD-284)** wherein he *inter alia* deposed that,

- i. In 2017 he met one of his college friends Mohd. Ali Akram Khan (9778386153), during a conversation Mohd. Ali Akram Khan informed him that he is engaged in trading of flex/packaging material through his firm and getting a fixed monthly commission, during discussion Mohd. Ali Akram Khan advised him to do trading of the same. Further, he stated that, Mohd. Ali Akram Khan assured him that his active involvement was not required and gave him a commission of @0.1% on the business transaction taken place from his firm.
- ii. Thereafter, Mohd. Ali Akram Khan introduced him to Mr. PS Bakshi (9810897781), who informed him that he is working with M/s MEPL, Noida as a Marketing Person. Thereafter, he provided his KYC documents such as PAN, AADHAR to Mohd. Ali Akram Khan, and registered a trading firm i.e., M/s P.V.V. Traders at Udaipur in the VAT regime. Further, on the advice of Mohd. Ali Akram Khan, he registered a new firm i.e., M/s Proview Traders (GSTIN 07ADGPT2590M2ZX), in the GST regime on his KYC documents.
- iii. When he asked Mohd. Ali Akram Khan, why M/s MEPL was not directly selling the goods to end customers & what is the need of the trading firm, Mohd. Ali Akram Khan informed him that they did not want to disclose the end customers of M/s MEPL.
- iv. Since July 2018, he started receiving invoices from M/s MEPL, and Md. Sadab issued outward tax invoices from his firm. Md. Sadab (9778386153) is an employee of Mohd. Ali Akram Khan at Jaipur, Rajasthan. Mohd. Ali Akram Khan introduced Md. Sadab to him and informed that he will look after all the account-related works (such as generation of invoices, return filing and payment, etc.) in respect of his firm i.e., M/s Proview Traders.
- v. he never contacted any transporter who were engaged in transporting goods from M/s MEPL to his firm or otherwise. Further, he admitted that no goods were ever delivered to his firm, sometimes on the specific direction of Mohd. Ali Akram Khan, he delivered invoices in relation to the outward supply to the truck driver at the Delhi border.



- vi. On being asked he stated that the account detail fed at the time of GST registration was his saving account (A/c No. 34054262972, IFSC-SBIN0016605) and after GST registration one current account was opened by him. All the payments, he had received in that account are from the buyer firms and after receipt, he made payment to M/s MEPL against the invoice value.
- vii. On being asked he stated that he has no information that what goods were transported. He only received invoices from different units of M/s MEPL, and in lieu of that, invoices were issued from his firm to other buyer firms. The payment is routed through his firm to M/s MEPL. For all this activity he withdraws Rs. 35,000/- per month from the current account of M/s Proview Traders. From that Rs. 15,000/- was booked as expenses incurred to maintain the firm, salary payment and rent (Rs. 6,500/-) of the premise.

Outcome: M/s Proview Traders (07ADGPT2590M2ZX) is a non-operational firm and was created by Mr. Vishal Tripathy in collusion with Mohd. Ali Akram Khan and Mr. PS Bakshi, marketing personnel of M/s MEPL. Further, the said firm was created solely for the purpose of clandestine supply of goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturer, which was shown to be supplied to M/s Proview Traders on the tax invoices issued by M/s MEPL. However, only tax invoices were received and issued from M/s Proview Traders, and no actual movement of goods to/from M/s Proview Traders.

4.4.3 Statement of Shri Ramesh Chander S/o Shri Daleep Singh, Proprietor of M/s Globe Enterprises (01BIKPC6617E1ZS), Kartholi, Dasal, Bari Brahmana, Samba, Jammu Kashmir, Director of M/s Gwalior Enterprises and 181133; Pvt. Ltd. (07AAHCG0818Q2Z7), Space No.-216, Plot No-19, Radha Chamber, G-Block Community Centre, Vikas Puri, Delhi-110018; Director of M/s Mantova Enterprises Pvt. Ltd. (07AALCM8399L1ZG), UG- 17, Tower No. 4, Vishwa Deep, District Centre, Janak Director of M/s Puri, Delhi-110058: Mantova Enterprises Pvt. Ltd. (09AALCM8399L1ZC), Plot No-8, Gata No.-237, Village Mubarakpur, Lucknow, 226021; Director of M/s Mantova Enterprises Pvt. Ltd. (18AALCM8399L1ZD) Hajo Road, Amingaon, Guwahati, Kamrup, Assam, 781031; and Director of M/s Manchester Enterprises Pvt. Ltd. (18AALCM8855D1Z1), 300Sq, Orchid Garden, Khanamukh Jalukbari Guwahati, Assam, 781014, was recorded under Section 70 of the CGST Act, 2017 on 06.04.2023 (**RUD-285**) wherein he *inter alia* deposed that,

 he was working with M/s New Bharat Golden Road Carrier, and used to go to M/s Uflex Limited, Noida for making bilty and during the said period he met Shri Sujeet alias Rahul owner of M/s Bharat Transport Company. In 2017 Shri Sujeet alias Rahul asked him to provide a copy of Aadhar Card/Pan Card for opening a new bank account. When he asked the reason for the same,



Shri Sujeet alias Rahul informed him that he received huge amounts in cash which is required to be deposited in his accounts and further transferred to the accounts of various firms. For this arrangement he was offered Rs. 8-10 thousand/month. He further stated that since he needed money, he provided the copy of Aadhar Card/Pan Card and a cancelled cheque of his PNB account (1398000100361127) to Shri Sujeet alias Rahul.

- Shri Sujeet alias Rahul paid him Rs. 8-10 thousand per month for almost 10 months.
- He further confirmed that registration of all the aforesaid companies/ firms on his KYC documents was obtained by Shri Sujeet alias Rahul because all these firms/companies were registered after providing documents to Shri Sujeet alias Rahul.
- On being asked he stated that he has no information that whether M/s Globe Enterprises, Jammu; M/s Gwalior Enterprises Pvt. Ltd., Delhi; M/s Mantova Enterprises Pvt. Ltd., Delhi; M/s Mantova Enterprises Pvt. Ltd., Lucknow; M/s Mantova Enterprises Pvt. Ltd., Assam and M/s Manchester Enterprises Pvt. Ltd., Assam, ever existed at their registered premise because he never visited the said premises and the mobile no./email id used for GST registration did not belong to him. He further stated he never signed any rent agreement of the above firms/companies.

Outcome: M/s Globe Enterprises, Jammu; M/s Gwalior Enterprises Pvt. Ltd., Delhi; M/s Mantova Enterprises Pvt. Ltd., Delhi; M/s Mantova Enterprises Pvt. Ltd., Lucknow; M/s Mantova Enterprises Pvt. Ltd., Assam and M/s Manchester Enterprises Pvt. Ltd., Assam were non-existent firms/companies as admitted by proprietor/one of the directors of said firms/companies in his statement that these firms were created by Shri Sujeet alias Rahul on his KYC documents and he never was involved in the functioning of these firms. Further, all the aforesaid firms/companies were created solely for the purpose of clandestine supply of the goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturer, which was shown to be supplied to these firms/ companies on the tax invoices issued by group companies of Montage.

4.4.4 Statement of Shri Rajender Singh Negi S/o Late Manwar Singh Negi, Proprietor of M/s R.N. Trading (07BPNPN0572H1ZO), H.No.-10, Harphool Vihar, Baprola, Nangloi, Delhi, 110041, was recorded under Section 70 of the CGST Act, 2017 on 24.04.2023 (**RUD-286**) wherein he *inter alia* deposed that,

• *he is working as* **delivery boy and engaged with Apollo Pharmacy for** *delivery of Medicine and getting a salary of Rs.* 22-24 *thousand per month.*



- he came to know about M/s R.N. Trading (07BPNPN0572H1ZO), when he received a summons sent by office of the DGGI, Ghaziabad Regional Unit.
- he met Shri Ankit Kumar common friend of his friend Shri Vinayak Tiwari. Shri Ankit Kumar asked him to provide copy of Aadhar Card/Pan Card/cancelled cheque to Shri Ankit Kumar for opening a new bank account, when he asked the reason for opening new bank account in his name, Shri Ankit Kumar informed him that in the said account funds will be received from some NGO and after deducting 4-5% from the said fund he had to transfer the remaining amount to other accounts as per his directions. However, later Shri Ankit Kumar informed that the account could not be opened and hence he did not pay any amount to him.
- he has no information that whether M/s R.N. Trading, ever existed at their registered premise because he never visited the said premise and stated that the said firm was registered on his KYC documents without his knowledge and hence the said firm was a fake firm and all the transaction carried by that firm were also fake.

Outcome M/s R.N. Trading was a non-existent firm and was created solely for the purpose of clandestine supply of the goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturer, which was shown to be supplied to M/s R.N. Trading on the tax invoices issued by group companies of Montage.

4.4.5 Statement of Shri Prabhjeet Singh S/o Shri Manjeet Singh, Proprietor of M/s S.S. Trading Co. (07GLDPS5476Q1ZO), H.No.2, Ambedkar Palace, A-1 Baprolla Vihar, Nangloi, Delhi-110041, was recorded under Section 70 of the CGST Act, 2017 on 05.04.2023 (**RUD-287**) wherein he *inter alia* deposed that,

- On being asked he stated that **he is working as delivery boy and engaged with Now Delivery for delivery of Medicine** and getting a salary of Rs. 20-22 thousand per month.
- he came to know about M/s S.S. Trading Co. (07GLDPS5476Q1Z0) when the search was conducted by Income Tax Department at his residential premise.
- he met Shri Ankit Kumar common friend of his friend Shri Vinayak Tiwari. Shri Ankit Kumar asked him to provide a copy of Aadhar Card/Pan Card/cancelled cheque to open a new bank account, when he asked the reason Shri Ankit Kumar informed him that in the said account funds will be received from some NGO and after deducting 4-5% from the said fund he had to transfer the remaining amount to other accounts. However, later Shri Ankit Kumar informed him that the account could not be opened and due to that Shri Ankit Kumar did not pay any amount to him.



 he has no information whether M/s S.S. Trading Co. (07GLDPS5476Q1Z0), ever existed at their registered premise because he never visited the said premise and stated that the said firm was registered on his KYC documents without his knowledge and hence the said firm was a fake firm and all the transaction carried by that firm was also fake.

Outcome M/s S.S. Trading Co., was a non-existent firm and was created solely for the purpose of clandestine supply of the goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturer, which was shown to be supplied to M/s S.S. Trading Co., on the tax invoices issued by group companies of Montage.

4.4.6 Statement of Shri Manish Kumar Jha S/o Shri Shiv Kumar Jha, Proprietor of M/s Sun Trading Company (07BDIPJ1111P1ZK), 111 Old 7L New No 48, G/F, Kh No 22/13 Surat Singh Enclave, Block-Y, Adarsh Enclave Prem Nagar, New Delhi-110041, was recorded under Section 70 of the CGST Act, 2017 on 24.08.2023 **(RUD-288)** wherein he *inter alia* deposed that,

- In 2018 he started work of delivery boy in a Pan Masala firm located at Sector-10, Noida, but because of less demand the firm was closed.
- he came to know about M/s Sun Trading Company (07BDIPJ1111P1ZK) when a letter was received at the residential address.
- during his job in Pan Masala firm at Sector-10, Noida he had given copy of his Pan Card, AADHAR card, residential address, a leaf of cheque book of his bank account to Shri Satya Prakash Kumar alias Rakesh, and possibly he created the said firm based on his KYC documents because the firm was registered nearby that period.
- On being asked he stated that he has no information that whether M/s Sun Trading Company (07BDIPJ1111P1ZK), ever existed at their registered premise because he never visited the said premise and stated that **the said firm was registered on his KYC documents without his knowledge and hence the said firm was a fake firm and all the transaction carried by that firm were also fake**.

Outcome M/s Sun Trading Company was a non-existent firm and was created solely for the purpose of clandestine supply of the goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturer, which was shown to be supplied to M/s Sun Trading Company on the tax invoices issued by group companies of Montage.

4.4.7 Statement of Shri Rajesh Kumar Singh S/o Shri Indrakant Singh, Proprietor of M/s Jyoti Traders (07EWAPS6954P1ZK), A-175, Naraina Industrial Area, Phase, 1, Naraina, Delhi, 110028 and M/s Soham Marketing (07EWAPS6954P3ZI), House No.126,



Block, C, Naraina Ph-1, Naraina, Delhi, 110028, was recorded under Section 70 of the CGST Act, 2017 on 03.02.2022 **(RUD-289)** wherein he *inter alia* deposed that,

- he is **working as Security Guard** and at present engaged with M/s Pankaj Security Services, Rajapuri, Delhi;
- he stated that Shri Rakesh Kumar (9871835094, 7065881339) working as Security Guard with him asked for his Pan Card, AADHAR card, to open a new bank account, when he asked the reason Shri Rakesh Kumar informed him that to recover the payment of known person. Because Shri Rakesh Kumar was working with him since last 8 years, he provided the said documents and thereafter Shri Rakesh Kumar went with him to YES bank and opened a new bank account.
- the email ID and the mobile number used for GST registration of both the above firms do not belong to him and he never received any message from the GST department.
- he has no information whether M/s Jyoti Traders (07EWAPS6954P1ZK), and M/s Soham Marketing (07EWAPS6954P3ZI), ever existed at their registered premise because he never visited the said premises and also stated that the said firms were registered on his KYC documents without his knowledge and hence the said firms were fake firm and all the transaction carried by them were also fake.

4.4.8 Statement of Shri Baburam Pal S/o Shri Ramnath Singh, Proprietor of M/s Pal Trading Co. (07BUXPP4783K1ZI), LG 8 D-211/104, Munirka, New Delhi-110021, was recorded under Section 70 of the CGST Act, 2017 on 03.02.2022 **(RUD-290)** wherein he *inter alia* deposed that,

- he is **working as Multi Skill Technician** in IBM during the period 2017 to 2019 and from 2019 to 2021 in George Scroll Horge and after April 2021 Orril Energy Services Pvt. Ltd.;
- on being asked he stated that except his job he is not engaged in any kind of business or profession;
- on being asked he stated Shri Vijay Kumar, his brother-in-law had asked for sending his KYC documents on his mobile through WhatsApp for his permanent job. After few days of that, Mr. Vijay Kumar called him and informed that for his permanent job, there has been talk in a company located in Noida 57, in which he will get more salary than before;
- In 2018, he called him and asked him to bring his documents, then he took him to a company, there was no board with the name of the company. There was only one two-storey building in the company's courtyard. Mr. Vijay took him to the



1st floor of the building and introduced him to a 30–35-year-old man who made him sign some forms, one of which he remembers was to open an HDFC bank account. Further, he also given a copy of his resume, high school papers, Aadhaar card, PAN card to that person at Mr. Vijay's behest;

- He further informed that when he said that he already has a saving account in HDFC Bank, so there is no need to open another account, then Shri Vijay informed that for job in that company he has to open a separate account;
- After about a month, when he asked his brother-in-law Mr. Vijay Kumar about joining, he informed that there was no vacancy at present and his documents are deposited in the company, as soon as the place is vacant, he will talk there for his joining. He further informed that, he asked his brother-in-law Mr. Vijay Kumar many times about joining in the company where he had submitted his documents, but Mr. Vijay avoided every time;
- He further stated that in September or October 2019, when he went to the Gandhi Nagar (Ghaziabad) branch of HDFC Bank where he has a savings account, to enquire about the premium of his medical insurance, then the officer there told that two accounts are active on his PAN card, one is saving account and the other is a current account. The bank officer further informed that the current account is in the name of Pal Trading Company.

After that he enquired about the same to his brother-in-law Mr. Vijay, he informed him that the company in which he had given documents for the job has opened an account by mistake, he will talk there and get that account closed;

• He further stated that the registration of M/s Pal Trading Company, with the GST Department using his documents such as PAN card and Aadhaar was obtained without his knowledge, and it is totally illegal and he have nothing to do with any act done by the said firm.

4.4.9 Statement of Ms. Neelima W/o Mr. Mahendra Singh Bisht, Proprietor of M/s Neelima Enterprises (07ASCPN4947P1Z2), B-158, Sadatpur, ST No.-2, Karawal Nagar, Shahdara, Delhi, 110094, was recorded under Section 70 of the CGST Act, 2017 on 12.12.2023 (**RUD-291**) wherein she *inter alia* deposed that,

She started the firm M/s Neelima Enterprises (07ASCPN4947P1Z2), in July' 2020 for doing E-commerce business under the guidance of her husband's friend Mr. Roshan Jha (8700529496). Further, she stated that Mr. Roshan Jha had given firms details to Chartered Accountant Mr. Anmol Kumar CA membership No. is 524308 (Mobile No. 9312745308 & 8954989743) & his assistant Mr. Pushpender (Mobile No. 8057893228 & 9821369203) to look after the GST return filing.



- she confirmed that except the supply made though MEESO (E-commerce Operator) she neither purchased nor supplied any goods.
- after receipt of recovery notice of Rs. 2,87,02,356/-, from Resolution Professional appointed in the matter of M/s Lagrowth Associates Pvt. Ltd. (Formerly M/s Montage Sales Pvt. Ltd.), it came to her knowledge that some unwanted transactions have been done by Mr. Anmol Kumar (Chartered Accountant) from M/s Neelima Enterprises without her knowledge, and when she asked him about this Mr. Anmol Kumar and his assistant said they would manage and would reply to this notice. But now she came to know that they have committed fraud in the firm and escaped from their office address i.e. F-7, SNG Plaza, Near Knowledge Park-2, Metro Station, Greater Noida.
- she did not carry out any transaction with M/s Lagrowth Associates Pvt. Ltd. (Formerly M/s Montage Sales Pvt. Ltd.) at any point of time and came to knowledge of this company only after receipt of recovery notice.
- Ms. Neelima submitted the bank account statement (*RUD-291C*) of her firm which clearly exhibit that no transaction was made to M/s Lagrowth Associates Pvt. Ltd. (Formerly M/s Montage Sales Pvt. Ltd.). Further, the a/c statement also exhibited that the payment received if any is only from Fashnear Technologies Pvt. Ltd. (payment gateway of MEESO) and directly from the customers through PAYU Payment gateway and no payment credited from any other firm/company.

4.4.10 Statement of Shri Ashish Mittal S/o Shri Mohan Lal Mittal, Proprietor of M/s Convergent Alliance, T-165, GF, Street No. 7, Shivaji Nagar, Narela, Delhi, 110040 was recorded under Section 70 of the CGST Act, 2017 on 08.02.2022 **(RUD-292)** wherein he *inter alia* deposed that,

- *M/s* Convergent Alliance, *T*-165, *GF*, Street No. 7, Shivaji Nagar, Narela, Delhi, 110040 is engaged in the erection and commissioning of CCTV and trading of CCTV cameras and accessories.
- M/s Convergent Alliance had not received any supply from M/s MSPL, Delhi. Further, he stated that a verbal communication was made with Shri H.S. Matharu with reference of one person namely Shri Rahul to supply packaging material to pack CCTV camera and for that they had made payment of Rs. 14,70,646/- to M/s MSPL, Delhi, but no material was delivered to his firm, and the payment made to M/s MSPL, Delhi is still to be recovered.
- M/s MSPL, Delhi, had issued tax invoices to M/s Convergent Alliance of taxable value Rs. 6.96 Crore involving GST Rs. 1.25 Crore during



the period April 2021 and May 2021, but neither any goods were delivered to his firm, nor he had made payment in respect of those invoices. Further, he stated that the invoices issued by M/s MSPL, Delhi were reflected in the GSTR-2A of M/s Convergent Alliance during April 2021 & May 2021, but ITC against those invoices were not availed by his firm.

 he contacted Shri H.S. Matharu regarding the same, but he informed that by mistake the said invoices were raised to his firm and he assured that the same would be rectified in due course, but till date, no correction has been made.

Outcome: M/s MSPL, Delhi had issued invoices to M/s Convergent Alliance and as stated by Shri Ashish Mittal no goods were supplied to his firms. From the above it appears that the invoices were issued to M/s Convergent Alliance only to hide the name of actual buyers and goods underlying those invoices were clandestinely supplied to actual buyers.

4.4.11Statement of Shri Vinay Rewari S/o Late Virendra Rewari, Proprietor of M/s Katyayni Enterprises (07AHGPR4479K1ZO), was recorded under Section 70 of the CGST Act, 2017 on 05.07.2021 **(RUD-293)** wherein he *inter alia* deposed that,

- he imports goods from Dubai and the goods imported by his firm is used in hotel and pharma industry.
- he met Mr. Ajay (9937386007, 8377930007), supervisor of M/s Bharat Transport Company in a function and Mr. Ajay informed him that he will arrange invoices for availing ITC so that cash liability of his firm could be saved. He agreed with Mr. Ajay and thereafter he received tax invoices from M/s MSPL, Delhi without the concomitant supply of goods during April 2021 through courier and ITC involved on those invoices were availed by his firm for payment GST liability against outward supply.
- on being asked he stated that the payment against those invoices was not made by him.

4.4.12 Statement of Shri Hansbir Betala S/o Shri Mahaveer Chand Betala, Godown - Md. Gahar Ali opposite NRL Petrol Pump, Hajo Road, Amingaon, Guwahati-31, was recorded under Section 70 of the CGST Act, 2017 on 26.06.2021 & 29.06.2021 (Collectively **RUD-294)** wherein he *inter alia* deposed that,

• On being asked he stated that he knows Shri Nitesh Kumar Singh, as he is the owner of the building Sri Ram Market, Chatribari, Guwahati-781001 and the said premise was being used for obtaining GST registration of M/s Khalid Traders (18FCMPK4971D1Z9).



- On being shown he stated that he agreed with the statement of Sri Nitesh Kumar Singh except the point that he was going to start any business, actually he told him that Sek Khalid was going to start business. Further, he stated that he had rented his godown at the premise of Md. Gahar Ali opposite NRL Petrol Pump, Hajo Road, Amingaon, Guwahati-31 to Sek Khalid.
- on being asked he stated that Madan Jena informed him about the Sek Khalid that he wants to start Trading Business. His Address was mentioned from the Aadhar Card shown to him by Madan Jena and Madan Jena came in contact with him in 2018 through an acquaintance Pulin Das.
- On being asked he stated that the go-down was primarily used for the storage of packing material of KP brand Pan masala and Zarda.
- On being asked he stated that the laminated packing material was supplied by Montage Sales Pvt. Ltd. (07AAMCM9016DlZG), to M/s Khalid Traders (18FCMPK4971D1Z9).
- On being shown the total outward supplies from Montage Sales Pvt. Ltd. (07AAMCM9016D1ZG) to M/s Khalid Traders (18FCMPK4971D1Z9) which is Rs 29,10,94,121/-, he agrees that the supplies made to M/s Khalid was received in his godown and from this stock whatever supplies were made all of them were supplied and delivered in the Brahmaputra Industrial Park on the direction of Madan Jena.
- On being asked that during the search at their godown tax invoice issued by M/s Montage Flexipack Sales Private Limited (o9AAMCM9015A1ZJ) to M/s Kamakhya Trading Co (18AJUPU0082F1ZR) was also recovered, he stated that he allowed to store the goods belonged to M/s Kamakhya Trading Co. He did not have any rental agreement of his godown premise with M/s Kamakhya Trading Co. The said arrangement was made as directed by Shri Madan Jena. The goods stored were Printed Paper Aluminum Foil Laminate meant for Kamala Pasand (KP) situated at Brahmaputra Industrial Park, Guwahati.
- On being asked that during the search at their godown tax invoices issued by M/s Montage Sales Private Limited (07AAMCM9016D1ZG) to M/s Manchester Enterprises Pvt. Ltd. (18AALCM8855D1Z1) was also recovered, he stated that he allowed to store the goods belonged to M/s Manchester Enterprises Pvt. Ltd. The said arrangement was made as directed by Shri Madan Jena. The goods stored were Printed Paper Aluminum Foil Laminate meant for Kamala Pasand (KP) situated at Brahmaputra Industrial Park, Guwahati.
- On being asked he stated that he had factory at Amingaon and engaged in manufacturing of Wafer Biscuits. The factory premise was consisting of 4800 sq. feet. Since the entire godown premise was not used or required by him then one



person Shri Pulin Das, who was the caretaker of M/s Assam Cafaine Compound, where his factory situated, introduced one person Shri Madan Jena in the year September/October, 2018 who needed a storing place of his goods. So, he let him to store his goods in his factory premise and in turn he paid him Rs 14/- per sq. feet for 660 sq. feet. Out of Rs 14/- he paid Rs 4.50/- to Pulin Das as his commission. But as the unit was not running well, he closed the unit and took the godown premise (3000 sq. feet) on rent from Md. Gahar Ali, Opposite NRL Petrol Pump, Hajo Road, Amingaon, Guwahati-31 for keeping his used machineries. Later on, he disposed all the used machineries and the godown was completely empty where Shri Madan Jena stored his goods. He did not have any rental agreement with Shri Madan Jena. Shri Madan Jena stored goods for different entities viz., M/s Manchester Enterprises Pvt. Ltd. (18AALCM8855D1Z1), M/s Kamakhya Trading Co (18AJUPU0082F1ZR) and M/s Khalid Traders (18FCMPK4971D1Z9). But Shri Madan Jena never made any rental agreement with him in regards to the godown premises in respect of M/s Manchester Enterprises Pvt. Ltd., M/s Kamakhya Trading Co, further he never met the proprietors of these two. Later on, after his hard pursuance Shri Madan Jena made a rental agreement in respect of his godown premise with M/s Khalid Traders but he took with him the copy of the same and presently he did not have any copy of the rental agreement made with *M*/s Khalid Traders.

- On being asked he stated that he does not have any detailed address of Shri Madan Jena and only had his number 7790000580/7790000587. He also stated that the payment was received in cash from Shri Madan Jena.
- On being asked he stated that during the period 2018 to March/April 2019 either Shri Madan Jena or one of his representative/workers was present during the dispatch of goods. After that he requested him to look after the dispatch and since then as per his direction, he gives instructions to his employee/worker and accordingly his employee/worker do the needful regarding dispatch of goods. After dispatch, he sent the documents of weighment slip and goods receipt acknowledgement slip so obtained to Shri Madan Jena. The goods were dispatched by D I Pick up Van from his godown

4.4.13 Statement of Mohd. Shadab Quadri, Proprietor of M/s Basic Traders Rajasthan was recorded under Section 70 of the CGST Act, 2017 on 22.01.2022, and 23.01.2022, **(RUD-295)** wherein he *inter alia* deposed that,

• Mohammad Ali Akram Khan alias Akram is his distant relative and he resides in Cuttack in my neighborhood;



- On being asked about M/s Imra Sales Rajasthan he stated that it is proprietorship firm of his boss i.e., Md. Ali Akram Khan, which was engaged in the business of trading of printed laminate;
- On being asked about M/s Basic Traders Rajasthan he stated that the firms is his proprietorship firm, and was established on the direction of Md. Ali Akram Khan during July 2017 and also registered with GST department vide GSTIN 08AAKPQ9466A1Z. He further stated that other firms on his PAN in the name of M/s Basic Traders (GSTIN-21AAKPQ9466A1ZP) was established in Cuttack during July 2017. Both these firms are engaged in supply of goods supplied by M/s MEPL;
- On being asked he stated that apart from the above he also established firms namely M/s PB Associates (07ADNPB7822K1ZC), M/s Proview Traders (07ADGPT2590M2ZX) and M/s Zodiac Traders (08AJVPA9330R1ZD) and M/s Iconic International (07FUHPS8719A2ZB). These all firms along with M/s Basic Traders and M/s Imra Sales were used for issuance of fake Invoices to various firms as per direction of Mohd. Akram whereas actual goods were delivered to Pan Masala/Chewing Tobacco manufacturers;
- On being asked he stated that he handed over bill and bilty of their firms to truck • drivers and the said goods were transported to Nathdwara. Onca a truck driver called him after reaching the factory premises and informed that the goods were unloaded in the factory of Miraj and initially, he did not know about the said facts and therefore he directed the driver to contact the sender of goods i.e. M/s MEPL, and then as per the direction of M/s MEPL, the said truck was unloaded at the premise of Miraj. He further stated that Md. Akram directed him that they had to get back sales invoices after unloading of goods as these goods were shown as supplied to their retail firms (firms created and operated by him), and further shown as cash sale from these retail firms and thus purchase invoices need to be in their custody, and therefore, these invoices need to be reverted back. Thus, he came to know that goods shown to be supplied by M/s Imra Sales Rajasthan, M/s Basic Traders, M/s Zodiac Traders, M/s Proview Traders, M/s Iconic International, and M/s PB Associates were actually supplied to M/s Miraj Products Pvt. Ltd., Nathdwara;
- On being asked he stated that he had login id and password for online banking transactions of M/s Imra Sales Rajasthan, M/s Basic Traders and M/s Zodiac Traders. However, he asked for OTP from the concern person as and when required, like in respect of M/s Imra Sales Rajasthan, Md. Akram provides OTP and in respect of M/s Zodiac Traders, Saiyad Altaf Ali provides OTP. Further, in



respect of M/s PB Associates, Shri Pramod Bansal did bank transaction and Shri Vishal Tripathi did banking transaction in respect of M/s Proview Traders;

- On being asked he stated that being employee of Md. Akram he was handling operations of Jaipur based firms and was being paid Rs. 20,000/- per month. Further, expenses of his house rent and food were also borne by Md. Akram.
- On being shown he had perused the printouts of text messages & WhatsApp chat with Shri Jaidev Singh and put his dated signature in token of having seen the same. He stated that in the said messages Shri Jaidev Singh sent his detail of goods transported by M/s Montage. In WhatsApp messages, Shri Jaidev Singh sent him invoices issued by M/s Montage Enterprises Pvt. Ltd., in the name of M/s Proview Traders and M/s Iconic International and simultaneously sent the detail of products transported in particular truck. For example,
 - "R.J.32.G.A.8143.N.Z.R.Tube.Rs2.Rolls.190.Ph.no.8955663613.Jodhpur"

On 09.06.2019 (6:37PM), he received message in which RJ-32-GA-8143 was the truck number, N.Z.R. Tub.Rs.2. Rolls.190 means 190 Rolls of Nazar Tube of MRP-2, the mobile number of truck driver was 8955663613 and Jodhpur denotes location where goods actually supplied.

> "R.J.32.G.B.1760.Zafri.P.M.@4.Rolls.380.Ph.no.9929191598.Jodhpur"

On 21.07.2019 (6:14PM), he received message in which RJ-32-GB-1760 was the truck number, Zafri.P.M.@4.Rolls.380 means 380 Rolls of Zafri Pan Masala of MRP-4, the mobile number of truck driver was 9929191598 and Jodhpur denotes location where goods actually supplied.

"D.L.1.G.C.6387.miraj@.10.Roll.271.Aviskar.pm.@4.Rolls.55.Talent.Zr.8.Rol ls.Dcid.Wasing.powder.156.Rolls.Miraj.@15.Rolls.ph.no.9166503947"

On 20.07.2019 (6:56PM), he received message in which DL-1-GC-6387 was the truck number, miraj@.10.Roll.271. means 271 Rolls of Miraj (MRP-10) Aviskar.pm.@4.Rolls.55 means 55 Rolls of Aviskar Pan Masala (MRP-4), Talent.Zr.8.Rolls means 8 Roll of Talent Zarda etc.

• On being perused Handwritten Diary mentioned at Sl.No. 6 & 7 to GST INS-02 of Panchnama dated 20.01.2022 drawn at residence of Moh Hafeez, Plot No. 28, Gali No.6, Nandpuri, Jaipur he stated that in the said diaries he maintained cash transactions related to various retail firms created & operated by him such as M/s A. K Brothers, Jaipur, M/s Deepak Enterprises, Jaipur, M/s Yaduvanshi Traders, Jaipur, M/s Kamaljeet Traders, Jaipur, M/s Shidra Enterprises, Jaipur and sometimes in Imra Sales also. He stated that he received cash from Md. Akram through Angadia and then such cash was deposited by him in above mentioned firms as per cash sale shown in books of accounts. As and when



required Md. Akrarn provided him cash and the said received amount was also mentioned in these diaries. For example, at page no. 17 of Handwritten Diary (Sr. No.6) to GST INS-02, he had shown opening balance of Rs.2,21,300/- on 18.08.2018 and then, he received Rs.50,00,000/- in cash on 18.08.2018 and thereafter he deposited Rs.2,00,000/- in M/s A. KTraders, Rs.2,00,000/- in M/s Deepak Enterprises, Rs.2,00,000/- in M/s Yaduvanshi Traders, Rs.26,450/- in M/s Shidra Enterprises and Rs.25,000/- in M/s Kamaljeet Traders and remaining amount Rs.45,69,850/- remained with him, which was further deposited in parts on 28.08.2018 on the next page (Page No.19). In such a manner, he maintained cash transaction in those diaries.

4.4.14 Statement of Mohd. Ali Akram Khan, Proprietor of M/s Imra Sales Rajasthan was recorded under Section 70 of the CGST Act, 2017 on 02.08.2022, and 03.08.2022 **(RUD-296)** wherein he *inter alia* deposed that,

- He started a trading firm M/s Imra Sales Rajasthan in Jaipur on directions of Shri Keshar Singh, employee of M/s Montage Enterprises Pvt. Ltd. He further stated that he created firms namely M/s Basic Traders Rajasthan, in the name of Md. Shadab Quadri, M/s Proview Traders in the name of Shri Vishal Tripathy, M/s PB Associates in the name of Shri Pramod Bansal and M/s Zodiac Traders in the name of Shri Altaf;
- On being asked he stated that on being directed by him Md. Shadab Quadri created retail firms namely M/s A K Brothers, M/s Yaduvanshi Traders, M/s Deepak Enterprises, M/s Kamaljit Traders, M/s Shidra Enterprises. Further, on being shown statements dated 22 01.2022, 23.01.2022 & 24.01 2022 tendered by Mohd. Shadab Quadri, he agreed with the facts mentioned in the statements of Mohd. Shadab Quadri;
- On being asked about the cash flow, he informed that after issuing the invoice to retail firms, they used to issue a token and send the same to Shri Idris who was working for Shri Kesar Singh, employee of M/s MEPL and on the basis of that token, M/s MEPL used to arrange the cash and delivered the same to them through Angadias and after receiving the cash in Jaipur, the cash was deposited by Mohd. Shadab in the bank accounts of the retail firms as per the value involved in the invoices issued to these retail firms. After receiving the amount in the bank account of these retail firms, Mohd. Shadab used to transfer the amount from these retail firms through RTGS/online mode to the firms through whom invoices were issued in their net banking;
- On being asked he stated that the he knows Shri Dipanshu Gupta and Shri Sarang Jhunjhunwala to whom he used to provide fake invoices from firms



operated by him to fake firms created by Shri Dipanshu Gupta during 2017-19. Shri Kesar Singh used to direct him for providing fake invoices to firms operated by Shri Dipanshu Gupta.

Outcome: In view of the statements of Md. Shadab Quadri and Md. Ali Akram Khan, it appears that for the period July 2017 to October 2019, Md. Shadab Quadri and Md. Ali Akram Khan has created/operated bogus firms namely M/s Basic Traders Rajasthan, Basic Traders Odisha, M/s Proview Traders, M/s PB Associates, M/s Zodiac Traders, M/s Imra Sales Rajasthan, M/s Polymart Traders, M/s Iconic International and M/s MEPL had shown supply to these bogus firms whereas underlying goods were actually supplied to various Pan Masala/Chewing Tobacco manufacturer. It also appears that the payment received in cash from M/s MEPL through angadias were deposited in the bank accounts of these bogus firms and through those bank accounts finally the money was transferred to the bank account of M/s MEPL.

4.5 Whereas, the GST returns of the firms/companies discussed in Para 4 were analysed and an excel sheet **(attached with this SCN as Annexure – A - Summary of 1M, 2A & 3B of Bogus Firms)** is prepared having financial year-wise details of ITC available as per GSTR-2A, ITC availed as per GSTR-3B and ITC passed on by issuing Business to Business invoice as per GSTR-1M. The Excel Sheet is attached with this Show Cause Notice.

And whereas, ongoing through the excel sheet, it appears that in many cases the ITC was available as per GSTR-2A (most of which passed on by M/s MEPL and its depots), but as per GSTR-3B returns the ITC was neither availed nor utilized or partial amount of ITC was availed and utilized. Similarly, as per GSTR-1M, these firms either had not shown or had partially shown outward supply. Further, it also appears that in many a case most of the outward supply was 'Business to Customer' type of supply, whereas the goods were customized goods. From the above it evident that goods were neither received nor supplied by these bogus firms along with tax invoices issued by M/s MEPL and its depots or issued by these firms. For illustration, a list of firms is placed hereunder, in which ITC was available as per GSTR-2A, but they either not availed or partially availed ITC in their GSTR-3B returns, similarly either not passed or partially passed on it as per GSTR-1M,

GSTIN & Trade Name (M/s)	ITC available as per (GSTR-2A)	ITC availed as per (GSTR-3B)	ITC passed on as per (GSTR-1M)
06AWRPM0914E1ZM	42,92,282		
Osis International	42,92,202	-	-
06FACPK6158L1ZC	09 10 00 4		
United International	28,19,304	-	-
07AKLPJ5035D1ZD	0.01.10.400	14 40 070	00.10.069
Blue Star	2,31,13,403	14,42,972	22,12,268



3,98,83,695	17,10,216	1,33,95,879
26,16,847	-	-
1,29,46,433	-	42,38,665
, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		. , . , .
47 10 410	_	_
4/,10,410		
50.04.541		
59,94,541	-	-
2,40,09,842	-	47,70,056
	E 4 60 119	
4,00,24,577	74,09,118	3,69,96,340
35,97,031	-	-
FO 00 919		
59,90,818	-	-
1 50 00 195		1 11 90 990
1,59,39,187	-	1,11,82,883
1,40,59,405	-	-
0.01.09.746		15 69 609
2,01,30,740	-	15,68,628
		26,16,847 - 1,29,46,433 - 47,10,410 - 59,94,541 - 2,40,09,842 - 4,06,24,577 74,69,118 35,97,031 - 59,90,818 - 1,59,39,187 - 1,46,59,485 -

4.6 Outcome of Financial Investigation of the bogus firms/ companies is discussed hereunder: The GST registration details of the aforesaid firms/companies have been downloaded from the AIO and on analysis it has been noticed that most of these firms/companies did not furnish the bank account details in their GSTIN. Further, following firms/companies have furnished the bank account details in their GSTIN.

And whereas, Account Opening Form, KYC documents and account statements of the following bank accounts were sought from the concerned bank. The information shared by the banks are analyzed and outcome of the analysis is briefly discussed hereunder,

GSTIN, & Trade Name	Bank IFSC & A/c Number	Outcome of Bank Analysis
01BIKPC6617E1ZS Globe Enterprises 07AAHCG0818Q2Z7 Gwalior Enterprises Pvt. Ltd. 09AAHCG0818Q1Z4 Gwalior Enterprises Pvt. Ltd.	PUNB0139800 1398000100361127 (RUD-297)	The A/c statement for the period 01.07.2017 to 31.03.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement. At two instances payment was received from S K Enterprises ₹1 and ₹5 Lakh and at one instance ₹5 lakh received from Genius Enterprises, the said payment was transferred to Gwalior Enterprises or cash withdrawal.
06IQSPS7194P1ZA Ganpati Enterprises	BDBL0001591 10190007921249 (RUD-298)	The A/c statement for the period 07.09.2019 to 03.09.2020 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.



07AAHCB5448H1ZK	YESB0000423	The A/c statement for the period 06.01.2018 to
BPSR Industries Pvt.	042363700000236	26.03.2018 analyzed but no transaction with M/s MEPL
Ltd.	(RUD-299)	& its depots reflected in the a/c statement.
09DLHPR6532R1Z3	IBKL0001409	The A/c statement for the period 17.06.2019 to
Kritika Trading Co.	1409104000085144	24.03.2023 analyzed but no transaction with M/s MEPL
Kittika Hauling CO.	(RUD-300)	& its depots reflected in the a/c statement.
07AAHCC6179Q1ZU	ICICooo6554	The A/c statement for the period 01.07.2017 to
Catania Enterprises Pvt.	655401502159	30.06.2021 analyzed but no transaction with M/s MEPL
Ltd.	(RUD-301)	& its depots reflected in the a/c statement.
07AAHCG0827H1ZQ		
Ghaziabad Enterprises Pvt. Ltd.		
09AAHCG0827H1ZM	KKBK0000143	The A/c statement for the period 18.07.2017 to
Ghaziabad Enterprises	8511594209	01.07.2021 analyzed but no transaction with M/s MEPL
Pvt. Ltd.	(RUD-302)	& its depots reflected in the a/c statement.
09AAHCB5448H1ZG	(1102 302)	
BPSR Industries Pvt.		
Ltd.		
		The A/c statement for the period 19.07.2020 to
07AAIFE1973E1ZI	BDBL0001591	02.04.2021 analyzed and it has been noticed that Rs.
Elfed Industries	10200004323104	36.30 Lakh was paid to M/s MSPL in two instances on
Lifed Hiddstries	(RUD-303)	05.01.2021 on 27.01.2021. Further, a huge amount was
		Cr/Dr from the said account.
		The A/c statement for the period 30.10.2021 to
07AAOPG0924D1Z2	UTIB0001007	25.11.2023 was analyzed and it has been noticed only an
Avi Foil Traders	921020041207967	amount of Rs. 9.67 lakh on 01.02.2022 was paid to M/s
	(RUD-304)	MSPL, Delhi and total Rs. 12.15 Lakh credited in the said account Rs. 11.84 debited during the complete period.
		The A/c statement for the period $10.09.2020$ to
	IDFB0020101	12.05.2021 was analyzed and it has been noticed that
07ABAFR7758R1Z9	10059321046	total Rs. 6.63 Crore was paid to M/s MSPL, Delhi during
Radical Corporation	(RUD-305)	the said period and payment was credited from various
		accounts.
or ADCDTorooMoZY	SBIN0016605	The A/c statement had been analyzed but no transaction
07ADGPT2590M2ZX Proview Traders	34054262972	with M/s MEPL & its depots reflected in the a/c
TTOVIEW Traders	(RUD-306)	statement.
		The A/c statement of PB Associates had been analyzed
		and it has been noticed that the huge amount of cash has
	UDECOTION	been deposited in the said account and after that the
07ADNPB7822K1ZC	HDFCoCTJCBL	amount was transferred to account of M/s MEPL.
P B Associates	0040231000903 (RUD-307)	Further, after December 2017 the payment was received from different firms to whom M/s P B Associates had
	(KUD-307)	issued tax invoices and after receipt of the payment from
		various accounts the same was transferred to the
		account of M/s MEPL.
	AUBL0002119	The A/c statement for the period 05.12.2020 to
07AEAFS4741N1ZP	2021211930502348	06.01.2022 analyzed but no transaction with M/s MEPL
S.G. Enterprises	(RUD-308)	& its depots reflected in the a/c statement.
07AILPC7741F1ZB	PUNB0016100	The A/c statement for the period 24.01.2019 to
Gravity Enterprises	0161000101499389	03.07.2021 analyzed but no transaction with M/s MEPL
09AILPC7741F2Z6	(RUD-309)	& its depots reflected in the a/c statement.
M K Trading Co.	x - 0- <i>))</i>	1



07AOKPK9451R2ZZ Jajoria Enterprise	SBIN0021223 62439609138 (RUD-310)	The A/c statement for the period 26.07.2021 to 19.04.2023 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07APVPC5712R1Z7 Genius Enterprises	IBKL0000109 0109104000223041 (RUD-311)	The A/c statement for the period 12.07.2017 to 28.11.2020 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement. However, some Cr/Dr was noticed from other firms. But no major transactions.		
07ASCPL1721F1Z7 Sanjay Trading Co	CNRB0002414 2414101002071 (RUD-312)	The A/c statement for the period 01.07.2017 to 30.06.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement. However, some Cr/Dr was noticed from other firms. But no major transactions.		
07AUOPK8454G1Z6 Image India	UBIN0567132 671301010050236 (RUD-313)	The A/c statement for the period 31.01.2017 to 02.12.2023 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07AWUPA7355A2ZJ M.R. Enterprises	HDFC000134 50100078957176 (RUD-314)	The A/c statement for the period 01.07.2017 to 03.07.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07AZVPR2782C1ZV Das Enterprises	BARB0KARDEL 26090200010876 (RUD-315)	The concerned bank informed that no such account exists in their data base.		
07BBVPH7773J1ZT Vishal Enterprises	IDFB0020195 10070689389 (RUD-316)	The concerned bank informed that Account no. incorrect.		
07BDIPJ1111P1ZK Sun Trading Company	IDIB000N108 6514254755 (RUD-317)	The A/c statement for the period 02.07.2017 to 30.09.2018 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07BDSPK7832A1ZG Ridhi Traders	ICIC0001004 100401002234 (RUD-318)	The A/c statement for the period 01.10.2017 to 07.01.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07BDSPK7832A2ZF Ragni Enterprises	ICIC0003424 342405500170 (RUD-319)	The A/c statement for the period 07.08.2021 to 01.10.2022 analyzed and it had been noticed that total Rs. 6.39 Crore was paid to M/s MSPL, Delhi during August 2021 to July 2022.		
07BGRPS1887H1ZM Mayo Enterprises	UTBI0VHI580 1643010042033 (RUD-320)	The A/c statement for the period 12.04.2014 to 09.04.2023 analyzed however, it is noticed that no payment was made to M/s MEPL and its depots.		
07BGRPS1887H2ZL Virgo Enterprises	ICIC0003424 342405000477 (RUD-321)	The A/c statement for the period 23.08.2021 to 01.02.2022 analyzed and some debit transaction with M/s MSPL were noticed.		
07BIWPR8811F1ZN Azad Trading	KKBK0005033 5712872266 (RUD-322)	The A/c statement for the period 22.08.2019 to 02.07.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07BJOPH4621J1Z2 Hari Sales Corporation	BARB0KARDEL 26090200010245 (RUD-323)	The a/c no. belongs to M/s Alka Fashion. Further, no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07BJRPN7668C1ZN P.C. Supplier Co.	KKBK0000206 3611952348 (RUD-324)	The A/c statement for the period 15.12.2017 to 11.10.2019 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07BJVPK8809G1ZL Winjet Industries	UBIN0575879 777501700050570 (RUD-325)	The concerned bank informed that the account number does not exist in their database.		



		The Allahahad Dark New Daktak Dood Drough ride
07BLFPJ4916H1Z4	ALLA0212881	The Allahabad Bank, New Rohtak Road Branch vide
D K Trading Company	50293285200	their mail dated 07.07.2021 informed that account number is invalid. (RUD-326)
07BLZPT9351G1Z5		As information shared by the concerned bank authority,
Tiwari Trading	ICIC0000717	they have reviewed their database, but no such account
Company	07170550357	exists in their database.
	ICICooo7389	The A/c statement for the period from 24.06.2021 to
07BMVPB3838H1ZR	738905500138	19.05.2023 has been analyzed and no payment was
Ganpati Enterprises	(RUD-327)	made to M/s MEPL and its depots.
	AUBL0002119	The A/c statement for the period 14.03.2018 to
07BRCPJ0056P1ZN	1811211916629780	12.09.2021 analyzed but no transaction with M/s MEPL
Om Trading Company	(RUD-328)	& its depots reflected in the a/c statement.
		As per the information shared by the concerned bank the
07BSTPS8497K2ZB	CNRB0002419	account holder is Shri Sanjay Kanojia and on analysis of
Singhania Enterprises	2419101013146	the bank statement no payment was made to M/s MEPL
	(RUD-329)	and its depots.
	SBIN0009112	The A/c statement for the period 01.07.2017 to
07BUTPS6855F1ZT	30359416496	24.07.2021 analyzed but no transaction with M/s MEPL
Avtar Trading Co	(RUD-330)	& its depots reflected in the a/c statement.
07BUXPP4783K1ZI	HDFC0000319	The A/c statement for the period upto 13.07.2021
Pal Trading Co.	50100030215280	analyzed but no transaction with M/s MEPL & its depots
	(RUD-331)	reflected in the a/c statement.
07CAUPR4187F1Z0	SBIN0013238	The A/c statement had been analyzed but no transaction
Alston Traders	34867008149	with M/s MEPL & its depots reflected in the a/c
	(RUD-332)	statement.
07CGJPD1778B1ZM	ICIC0000842	The A/c statement for the period from 17.05.2016 to
Mehul Enterprises	084205500788	17.10.2019 analyzed but no transaction with M/s MEPL
-	(RUD-333)	& its depots reflected in the a/c statement.
07CLBPM0865R2ZI	SBIN0005222	The A/c statement for the period from 19.09.2014 to $M_{c} = 0.0000$ and $M_{c} = 0.0000$
Maurya Enterprises	34144144673	31.08.2020 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
	(RUD-334) CORP0001761	a its depots reflected in the a/c statement.
07DDTPK9495L2ZA	5101020022709580	The concerned bank informed that the account number
Kavita Industries	(RUD-335)	does not exist in their database.
	CNRB0003523	The A/c statement for the period 01.07.2017 to
07DIOPP3069P1ZA	5928101004060	01.07.2021 analyzed but no transaction with M/s MEPL
Sitakant Trading Co	(RUD-336)	& its depots reflected in the a/c statement.
	(1102 330)	The A/c no. belongs to M/s Das Enterprises and not on
		the name of Gupta Enterprises or its proprietor's name.
07DOOPG0973R1Z4	BARBOKARDEL	Further, on analysis of A/c statement it has been noticed
Gupta Enterprises	26090200010191	that Rs. 16.51 Crore was paid to M/s MSPL, Delhi and
	(RUD-337)	M/s MFSPL, Lucknow, whereas no outward supply was
		made to M/s Das Enterprises.
OTDEVEKS-00V17D	FDRL0002183	The A/c statement for the period 03.07.2017 to
07DRXPK8539K1ZP Golf Traders	21830100022933	29.06.2021 analyzed but no transaction with M/s MEPL
	(RUD-338)	& its depots reflected in the a/c statement.
07DSUPA3132C1Z2	SIBL0000117	As per bank statement shared by the concerned bank
Universal Traders	0117073000004711	some debit transactions were made to M/s MSPL
	(RUD-339)	·
07DVRPK7541H1Z2	HDFC0000481	The A/c statement for the period upto 01.07.2021
Jagdamba Enterprises	50100128316976	analyzed but no transaction with M/s MEPL & its depots
	(RUD-340)	reflected in the a/c statement.



		The A/c statement for the period from 18.06.2020 to		
07EUIPP4391D1ZD Shiv Shakti Enterprises	UTIB0002172 920020039564541 (RUD-341)	18.12.2023 has been analyzed and it has been noticed that no transactions were made to M/s MEPL and its depots. Moreover, analyses of KYC & AoF revealed the name of Proprietor of M/s Kumar Sales Corporation as Shri Vikas.		
07EULPS3748N1ZN Rajasthan Udyog	SIBL0000117 0117073000004709 (RUD-342)	As per bank statement shared by the concerned bank some debit transactions were made to M/s MSPL		
07EWAPS6954P3ZI Soham Marketing	ICIC0001125 112505002422 (RUD-343)	As per information shared by the concerned bank, the account holder name is M/s Hari Sales. Further, the bank statement for the period 25.08.2020 to 30.04.2022 furnished by the bank has been analyzed and no transactions was made to the group companies of MEPL.		
07FERPS7038C1Z1 A S Sales	VIJB0007602 760201013000025 (RUD-344)	As per information shared by the concerned bank the bank has merged with BOB and new account number allotted is 78490200000430. On analysis of the bank statement no payment was made to M/s MEPL and its depots.		
07FEZPS1061B1Z8 Surya Enterprises	BARBoKARDEL 08000100005798 (RUD-345)	The A/c no. belongs to Mr. Esnagari Hai Kumar and not on the name of Surya Enterprises or its proprietor's name. Further, no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07FUMPM7409E1ZC Shine International	IDFB0020124 10078449859 (RUD-346)	On analysis of A/c statement it has been noticed that payment was credited in the said bank accounts from various firms and immediately transferred to the bank a/c of M/s MSPL, Delhi.		
07HDEPD4213G1ZY Singh International	BARB0KARDEL 26090200010208 (RUD-347)	The A/c no. belongs to M/s Shreejee Associates Trading and co. Further, no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07HJCPD2205L1ZG Shiv International	IDFB0020105 10081991023 (RUD-316)	The concerned bank informed that Account no. is incorrect.		
07HKJPS1195G1ZO Shree Shyam Trading Company	BDBL0001727 50180012013990 (RUD-348)	The A/c statement for the period 11.05.2018 to 11.07.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07HWVPS6195C1ZM Suraj Enterprises	CNRB0002414 2414101001762 (RUD-349)	The A/c statement for the period 01.07.2017 to 09.03.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07IKIPS8885M3ZQ G.S. Trading	ALLA0210392 50294467704 (RUD-350)	The A/c statement for the period 02.07.2017 to 06.07.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07KUSPK7859B1ZV Jay Trading Co.	BARB0KARDEL 26090200010198 (RUD-351)	The A/c no. belongs to M/s Earthboy Ecofriendly RO Systems Pvt. Ltd. Further, no transaction with M/s MEPL & its depots reflected in the a/c statement.		
07OHZPS8032L1ZZ Salasar Enterprises	BARBoKARDEL 26090200010195 (RUD-352)	The A/c no. belongs to M/s Vishwakarma Contractor and not on the name of Salasar Enterprises or its proprietor's name. Further, no transaction with M/s MEPL & its depots reflected in the a/c statement.		
08AJVPA9330R1ZD Zodiac Traders	AUBL0002404 1721240414155968 (RUD-353)	As per bank statement for the period 18.09.2017 to 30.03.2018 shared by the concerned bank some debit transactions were made to M/s MPSPL, Jaipur.		



		The A/e statement for the period as a an an
09AALCM8399L1ZC 18AALCM8399L1ZD Mantova Enterprises Pvt. Ltd.	YESB0000014 001451100002734 (RUD-354)	The A/c statement for the period 23.08.2017 to 25.04.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement. Further, only a Credit of Rs. 1 Lakh and Debit entry of Rs. 1Lakh to Mantova Enterprises Pvt. Ltd.
09AOZPY6635A1Z6 M.K. Trading Co.	SBIN0001100 36469928927 (RUD-355)	The A/c statement for the period 20.01.2017 to 28.04.2023 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
09BFTPT4792K1Z8 Tripathi Enterprises	CNRB0002897 2897101003695 (RUD-356)	The A/c statement for the period 01.07.2017 to 30.04.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
09BPTPB6759L2ZZ S K Trading Company	VIJB0006509 650901011002349 (RUD-357)	As per information shared by the concerned bank the bank has merged with BOB and new account number allotted is 66080100003881. On analysis of the bank statement account holder name is Subhash Kumar Bajpeyi and no payment was made to M/s MEPL and its depots.
09BSPPG9767A1ZA Rajeev Trading Co.	AUBL0002104 1711210414205575 (RUD-358)	The A/c statement for the period 16.10.2017 to 06.01.2022 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
09BXNPA3450K1ZB S.A. Enterprises	BARBoSAROJI 3649010000448 (RUD-359)	The A/c statement for the period 01.07.2017 to 01.05.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
09CBIPA0305H1Z7 Govind Enterprises	ORBC0100467 04672121008171 (RUD-360)	The A/c statement for the period 03.07.2017 to 04.07.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
09DMHPK7624A1Z4 G.S. Trading Co.	BKDN0720860 086010042014 (RUD-361)	The A/c statement for the period 15.10.2017 to 28.11.2020 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
09GUGPS2927N1ZR R S Enterprises	ORBC0101273 12732191018650 (RUD-362)	As per the bank statement shared by the concerned bank, the account holder name is Gautam Singh. Further, on analysis of the bank statement no payment was made to any group companies of MEPL.
09HAIPS2009Q1ZY Manish Enterprises	SBIN0004566 36878737787 (RUD-363)	The A/c statement for the period 01.07.2017 to 08.09.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.
19ARFPM0150K1ZS Mas Sales Corporation	BDBL0001843 10170001498116 (RUD-364)	On analysis of a/c statement it has been noticed that the cash deposited in piecemeal in the account and were transferred to various bogus firms and also in the account of M/s MEPL.
21AOGPK6533E2ZB Polymart Traders	ICIC0006342 634201523230 (RUD-365)	As per information shared by the concerned bank, the account holder name is Md Ali Akram Khan. Further, the bank statement for the period 03.04.2012 to 30.09.2023 furnished by the bank has been analyzed and no transactions was made to the group companies
22ADBPT8598E1Z8 Bhagyashree Sales	VIJB0007602 760201010010222 (RUD-366)	As per information shared by the concerned bank the bank has merged with BOB and new account number allotted is 784902000002081. On analysis of the bank statement no transactions were made with M/s MEPL and its depots.
22APSPC9712N1ZI Choudhary Sales	VIJB0007678 767801013000019 (RUD-367)	As per information shared by the concerned bank the bank has merged with BOB and new account number allotted is 66080200000093. On analysis of the bank



		statement some transaction has been noticed with
		Montage Printpack Sales Pvt. Ltd.
		As per information shared by the concerned bank the
	VIJB0007602	bank has merged with BOB and new account number
22BTDPJ4048N1ZM	760201013000020	allotted is 78490200000426. On analysis of the bank
Raipur Sales	(RUD-368)	statement no transaction was made with M/s MEPL and
		its depots.
		The A/c statement for the period 26.05.2020 to
	HDFC0004676	09.07.2021 analyzed and it had been noticed that total
22DGAPS4834P1ZZ	50200049209022	Rs. 29.09 Crore was paid to M/s MPSPL, Gwalior during
Dilip Enterprises	(RUD-369)	the period and almost all the amount credited in the said
		account is through Cash deposit at the bank branch.
	CNRB0002073	The a/c statement for the period 15.11.2017 to
23ABVPO1550F2ZM	2073201002999	19.08.2022 was analyzed and noticed that Rs. 1.29
Asha Industries	(RUD-370)	Credited and debited from the said account but no
	(KUD-370)	payment was made to M/s MEPL or its depots.
23ADWPT8362K1ZM		The A/c number belongs to Shri Tarun Kumar. On
Simran Trading	SCBL0036069	analysis of the bank statement no transaction it has been
23EHFPP8744G1Z2	80010288978	noticed that no transaction with M/s MEPL and its
J M D Trading Co		depots reflected.
		The a/c statement for the period 01.05.2022 to
	HDFC0004676 50200045040038 (RUD-371)	31.03.2023 was analyzed and noticed that a single cash
23AHHPT2260P1ZY		deposit entry of Rs. 53.15 Lakh on 24.06.2022 and out
D.K. Enterprises		of this Rs. 53.13 was transferred to the account of M/s
- ·-······ F - · · ·		MPSPL, Gwalior on 27.06.2022. Further, except this
		neither any credit nor any debit entry in the said
		account.
		The A/c statement for the period 17.10.2019 to
23BPJPS8789B1ZE	HDFC0004676	13.07.2021 analyzed and it had been noticed that total
Kansana Enterprises	50200044916813	Rs. 20.62 Crore was paid to M/s MPSPL, Gwalior during
_	(RUD-372)	the period and almost all the amount credited in the said
		account is through Cash deposit at the bank branch. The A/c statement for the period 01.06.2020 to
	HDFC0004676	12.07.2021 analyzed and it had been noticed that total
23BPJPS8789B2ZD	50200049291651	Rs. 41.50 Crore was paid to M/s MPSPL, Gwalior during
Dharmveer Sales	(RUD-373)	the period and almost all the amount credited in the said
	(ROD 3/3)	account is through Cash deposit at the bank branch.
	HDFC0004676	The A/c statement for the period 01.07.2019 to
	BKID0009458	13.07.2021 analyzed and it had been noticed that total
23BXDPG5417J1ZO	50200039703921	Rs. 38.28 Crore was paid to M/s MPSPL, Gwalior during
Ashta Traders	945810510000747	the period and almost all the amount credited in the said
	(RUD-374)	account is through Cash deposit at the bank branch.
		The A/c statement for the period 28.07.2020 to
	HDFC0004676	13.07.2021 analyzed and it had been noticed that total
23ELVPK9548F1ZG	50200049435150	Rs. 22.95 Crore was paid to M/s MPSPL, Gwalior during
Kumar Traders	(RUD-375)	the period and almost all the amount credited in the said
		account is through Cash deposit at the bank branch.
		The A/c statement for the period 19.10.2019 to
ooCONDO-to-P-72	HDFC0004676	13.07.2021 analyzed and it had been noticed that total
23GQNPS5195F1Z9 Ahmana Traders	50200045007410	Rs. 22.18 Crore was paid to M/s MPSPL, Gwalior during
Anniana maders	(RUD-376)	the period and almost all the amount credited in the said
		account is through Cash deposit at the bank branch.



23HRAPS7815D1ZS P S Corporation	VIJB0007678 760201011003061 (RUD-3 77)	As per information shared by the concerned bank the bank has merged with BOB and new account number allotted is 784902000004871. On analysis of the ban statement no transaction was made to M/s MEPL and it depots.			
24ATUPD1928M1ZB Alfa Enterprises	BKID0002000 200010110011957 (RUD-378)	The A/c statement for the period 04.07.2017 to 12.02.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.			
24DKHPM5514D1ZF S M Traders	UTIB0SBMCB1 162110100041447 (RUD-379)	The concerned bank informed that no such account exists as per their bank records.			
27AHHPT2260P1ZQ D.K. Enterprises	HDFC0004676 50200045040038 (RUD-380)	The A/c statement for the period 21.10.2019 to 13.07.2021 analyzed and it had been noticed that total Rs. 12.41 Crore was paid to M/s MPSPL, Gwalior during the period and almost all the amount credited in the said account is through Cash deposit at the bank branch.			
36AAQPZ7304Q1ZL S9 Trading Co.	JAKA0HAIDER 0317010100000950 (RUD-381)	The A/c statement for the period 09.11.2019 to 04.07.2021 analyzed and it had been noticed that total Rs. 6.26 Crore was paid to M/s MSPL, Delhi during June to December 2020 and all the credit payment was received from M/s Rovty International.			
36BGUPA2323M1Z8 Crystal Traders	IBKL0001048 1048104000120070 (RUD-382)	The concerned bank vide their mail informed that the account does not exist in IDBI BANK data base.			
36BPAPA5534D1ZH MAZ Traders	ICICI 665001520460 (RUD-383)	The A/c statement for the period 01.07.2017 to 06.07.2021 analyzed but no transaction with M/s MEPL & its depots reflected in the a/c statement.			
07OWUPS4414J1ZJ Saraswati Enterprises	IDFB0020105 10084001922 (RUD-384)	The said account belongs to Mo. Nadeem and not on the name of proprietor of M/s Saraswati Enterprises, and no transactions had been reflected with M/s MEPL & its depots.			
07GLDPS5476Q1Z0 S.S. Trading Co.	623002010006582 (RUD-385)	The said account belongs to Shri Prabhjeet Singh proprietor of M/s Saraswati Enterprises, and no transactions had been reflected with M/s MEPL & its depots.			
29ABPPZ7252H1ZR Elegant Traders	UBIN0545775 564902010003499 (RUD-386)	The said account belongs to Mohd. Zaki Ulla proprietor of M/s Elegant Traders, and no transactions had been reflected with M/s MEPL & its depots.			
07BGRPS1887H1ZM Mayo Enterprises	UTBI0VHI580 1643010042033 (RUD-387)	The A/c statement for the period 12.04.2014 to 09.04.2023 analyzed however, it is noticed that no payment was made to M/s MEPL and its depots.			
Jyoti Traders	034863300004039 (RUD-388)	Both these firms made payments to M/s MFSPL, Lucknow, whereas as per GSTR-1M of M/s MFSPL,			
K N Traders	034863300004027 (RUD-389)	Lucknow no outward supplies were made to both these firms.			

And whereas, from the analysis of the aforesaid bank accounts of bogus firms/companies it appears that most of the bank accounts statements does not reflect any transactions with M/s MEPL and its depots. In some of the account statements transactions were noticed with M/s MEPL and its depots, and further analysis of account statement revealed that initially huge cash was deposited in the account and on the same



day or very next day the fund was transferred to the bank account of M/s MEPL and its depots.

4.7 Analysis of inward/outward e-way bills generated *w.r.t.* bogus firms/ companies: The inward/outward e-way bills generated *w.r.t.* bogus firms/companies have been downloaded from the "E-Way Bill MIS" portal and analyzed, the outcome of analysis is briefly discussed hereunder,

i. Many of the bogus firms had shown outward supply of different HSN other than that of inward HSN for e.g.,

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	56	10,83,98,800	3904	3	46,05,540
4823	37	3,65,48,703	8466	2	6,49,000
3923	18	65,73,695	7208	2	5,16,946
			3906	3	4,40,730

> M/s Blue Star (07AKLPJ5035D1ZD)

> M/s Jajoria Enterprises (07AOKPK9451R2ZZ)

Inward e-way Bills			Outward e-way Bills		
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	28	5,19,24,522	7202	5	1,03,41,520
4823	11	2,51,30,989	7602	18	92,12,590
3923	3	41,33,918	7404	2	33,63,944
8517	1	24,52,736	7607	2	28,78,518
3920	2	10,17,523	3902	3	16,69,700

➢ M/s Kapur Enterprises (07BETPY0156F2Z1)

Inward e-way Bills			Outward e-way Bills		
HSN	No. of	No. of Total Invoice	HSN	No. of Total Invoice	
1151	EWBs	Value	nən	EWBs	Value
7607	71	8,33,41,552	6802	7	37,70,674
4823	23	3,66,78,249	3917	3	20,99,643
3923	5	41,26,270	8546	3	19,95,916
3920	1	3,04,517	7418	1	19,89,211
4802	1	1,02,681	8537	1	6,93,840
			8412	2	5,89,853
			9030	1	4,24,800
			8481	1	3,53,976

> M/s Mahalaxmi Enterprises (07AFUPJ0552P1ZU)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	54	17,40,91,503	7607	24	3,94,51,152



4823	30	7,97,14,001	7602	11	2,66,98,234
3923	6	33,30,209	3206	4	84,13,400
3920	2	4,97,889	3902	6	59,51,920
			6204	5	45,33,179
			3904	3	46,65,720
			4002	3	28,38,724
			7601	1	24,04,793
			7208	3	16,01,998
			7228	4	15,13,728

➤ M/s Kumar Enterprises (07AOCPK8764K1ZG)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of	Total Invoice	HSN	No. of	Total Invoice
1151	EWBs	Value		EWBs	Value
7607	31	4,76,26,883	7404	16	6,19,09,858
4823	19	3,79,73,475	7607	15	1,31,60,360
3923	2	2,11,456	4823	8	86,34,392
			7220	2	40,73,832
			3926	1	28,98,198

➢ M/s Surya Enterprises (07FEZPS1061B1Z8)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	37	7,33,76,651	7204	218	17,60,19,571
4823	14	2,03,90,685	2713	75	9,04,66,233
7204	17	1,22,03,492	2710	34	3,58,58,595

➤ M/s Iconic International (07FUHPS8719A2ZB)

Ir	Inward e-way Bills			tward e	-way Bills
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	434	117,59,03,328	7607	184	82,94,36,537
4823	323	45,78,32,769	7204	101	17,32,92,649
3923	71	2,68,86,430	4823	11	3,56,71,919
			5208	33	3,11,35,963
			6105	36	3,02,84,345
			3920	14	2,89,44,378
			2915	15	2,52,95,518
			2932	7	2,38,53,700
			2917	10	2,29,93,480
			2926	6	2,15,17,536
			3206	6	1,90,77,650
			2905	9	1,70,45,619
			2713	27	1,68,87,536
			3402	10	1,64,18,164
			4403	13	1,54,49,012



	292	22	6	1,43,48,800
	290	02	7	1,40,95,678
	851	18	4	1,19,96,175

- *ii.* Many of the bogus firms had shown outward supply of same HSN as that of inward HSN, but there was interchange in the value of inward and outward of same HSN, for example, goods of HSN 7607 (Paper Aluminum Foil Laminate) change with goods of HSN 4823 (Plastic Laminate) whereas both are entirely different in composition, e.g.,
 - > M/s BPSR Industries Pvt. Ltd. (07AAHCB5448H1ZK)

Inward e-way Bills			Ou	tward e	-way Bills
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	187	27,92,19,445	7607	12	6,21,87,770
4823	39	1,69,65,718	4823	103	24,40,92,732

> M/s Ghaziabad Enterprises Pvt. Ltd. (07AAHCG0827H1ZQ)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	206	72,05,34,449	7607	129	40,36,64,755
4823	3	55,33,450	4823	76	18,07,86,632

> M/s P.C. Supplies Co. (07AAHCG0827H1ZQ)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	41	5,69,49,326	7607	4	31,97,038
4823	29	1,44,90,121	4823	59	13,68,88,508

> M/s G.S. Trading (07IKIPS8885M3ZQ)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value		No. of EWBs	Total Invoice Value
7607	243	72,31,21,917			
4823	3	55,07,285	4823	53	12,50,59,899

- *iii.* Many of the bogus firms had received inward e-way bills of high value but not generated e-way bills *w.r.t.* outward supply or generated very limited e-way bills, e.g.,
 - ➢ M/s Osis International (06AWRPM0914E1ZM)

Inward e-way Bills		Outward e-way Bills			
HSN	No. of EWBs	Total Invoice Value	HSN	No. of EWBs	Total Invoice Value
7607	12	2,81,38,290	NIL		



> M/s Urban Trade Industries (07AAGFU2991L1ZL)

Inward e-way Bills			Outward e-way Bills			
HSN	No. of	Total Invoice	HSN	No. of	Total Invoice	
1151	EWBs	Value	1151	EWBs	Value	
7607	12	3,63,86,772				
4823	10	2,20,46,744	NIL			
3923	4	50,86,578				

➤ M/s Radical Corporation (07ABAFR7758R1Z9)

Ir	iward e	-way Bills	Outward e-way Bills		
HSN	No. of	Total Invoice	HSN	No. of	Total Invoice
1151	EWBs	Value	1151	EWBs	Value
7607	47	11,60,84,837			
4823	7	1,45,66,192	NIL		
3923	2	2,30,383			

> M/s Kumar Trading Company (07LLYPS5428N1ZO)

II	ıward e	-way Bills	Outward e-way Bills			
HSN	No. of Total Invoice EWBs Value		HSN	No. of EWBs	Total Invoice Value	
7607	81	17,11,41,381	7607	2	18,92,056	
4823	62	8,84,49,476	4823	1	2,99,179	
3923	28	1,18,14,157	3923	1	54,40,905	

M/s Chauhan Traders (09AGCPC4247K1ZF)

II	iward e	-way Bills	Outward e-way Bills			
HSN	No. of	Total Invoice	HSN	No. of	Total Invoice	
IISI	EWBs	Value	11514	EWBs	Value	
7607	74	15,04,74,735	7607	2	96,46,314	
4823	98	17,99,16,645	4823	1	28,04,869	
3923	6	26,80,836				

Further, the HSN/Value wise details of inward/outward e-way bills generated *w.r.t.* these bogus firms are annexed with this notice as **Annexure "Eway-1 to Eway-267**".

And whereas, all these bogus firms are trading firms and hence they can't change the HSN of inward and outward goods shown to be supplied, hence, it appears that these all transactions were only paper transaction and no actual movement of goods took place to/from these firms.

4.8 Whereas, from the discussions made in Para 4, it appears that the firms/companies discussed therein were non-existent or if exists had not carried out any genuine business transactions with M/s MEPL or its depots. Further, during recording of statements of Shri Pramod Bansal, Proprietor of M/s P.B. Associates; Shri Vishal Tripathy, Proprietor of M/s Proview Traders; Shri Ramesh Chander, Proprietor of M/s Globe Enterprises, Jammu, Director of M/s Gwalior Enterprises Pvt. Ltd., Delhi, M/s



Mantova Enterprises Pvt. Ltd., Delhi, M/s Mantova Enterprises Pvt. Ltd., Lucknow, M/s Mantova Enterprises Pvt. Ltd., Assam and M/s Manchester Enterprises Pvt. Ltd., Assam; Shri Rajender Singh Negi, Proprietor of M/s R.N. Trading; Shri Prabhjeet Singh, Proprietor of M/s S.S. Trading Co.; Shri Manish Kumar Jha, Proprietor of M/s Sun Trading Company; Shri Rajesh Kumar Singh, Proprietor of M/s Jyoti Traders, Delhi, and M/s Soham Marketing, Delhi; Shri Baburam Pal, Proprietor of M/s Pal Trading Co. Ms. Neelima, Proprietor of M/s Neelima Enterprises, they all unequivocally admitted that the firms/companies registered on their name were bogus firms/companies and the transactions carried out by the firms/companies registered on their KYC documents were bogus transactions.

And whereas, Shri Vinay Rewari, Proprietor M/s Katyayni Enterprises, Delhi had unequivocally admitted that they had received tax invoices issued by M/s MSPL, Delhi through courier without concomitant receipt of underlying goods and had availed irregular ITC on the strength of those invoices.

Whereas, during the search at the residential premise of Mr. Shekhar Kumar Gupta some loose papers were recovered and during recording statement of Mr. Shekhar Kumar Gupta he informed that those papers were having details of those bogus firms which were provided by him to M/s MEPL. Further, he stated that M/s MSPL had issued tax invoices without supply of goods to those firms/companies. Further, he stated that the firms listed in the said loose sheet did not have bank accounts and hence payment against the supply shown to these firms by M/s MSPL is pending and Mr. Puneet Kumar Mishra, accountant of M/s MSPL recently handed over the details of these firms so that arrangement for payment from these firms be made by him. The firms/companies mentioned in the said loose papers are the same firms which are discussed in para 4. It further evident that all these firms/companies are bogus, and no supply of goods was made by M/s MEPL and its depots against the invoices issued to these firms/companies. It also evident that the goods underlying those tax invoices issued to these firms/companies.

4.9 Whereas, in view of the above, it appears that all the firms/companies discussed in Para 4 are non-existent/non-operational firms/companies and hence neither the goods were received nor supplied by them, and all these firms/companies were engaged in trading of invoices without receipt/supply of goods.

And whereas, in view of the above, it appears that all these firms/companies had taken ineligible ITC i.e., availed ITC without receipt of goods in violation of provisions of Section 16(2) of the CGST Act, and had passed on ineligible ITC i.e., issued tax invoices to pass on ITC without supply of goods in violation of provisions of Section 31 of the CGST Act.

Therefore, it appears that all the firms/companies discussed in Para 4 are liable for a penalty in terms of the provisions of Section 122(1)(*vii*) of the CGST Act, 2017, read with similar provisions of the SGST Act, 2017 and/or Section 20 of the IGST Act, 2017,



for taking or utilizing Input Tax Credit without actual receipt of goods. It also appears that all these firms/companies are liable for penalty in terms of the provisions of Section 122(1)(ii) of the CGST Act, 2017, read with similar provisions of the SGST Act, 2017 and/or Section 20 of the IGST Act, 2017, for issuance of tax invoices or bills without actual supply of goods.

5. INVESTIGATION CARRIED OUT AGAINST M/S MEPL, JAMMU, NOIDA, HARIDWAR & MALANPUR; M/S MSPL, DELHI; M/S MFSPL, LUCKNOW AND M/S MPSPL, GWALIOR:

5.1 STATEMENTS OF THE KEY PERSONS OF **M**/S **MEPL**, **J**AMMU RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER:

5.1.1 Statement of Shri Ajay Kumar Tripathi, DGM (Production) of M/s MEPL, Jammu was recorded under Section 70 of the CGST Act, 2017 on 16.06.2021 **(RUD-390)** wherein he *inter alia* deposed that,

- In respect of sale of finished goods, no direct communication with the customer is being made by M/s MEPL, Jammu. Shri Yogeshwar Singh, Director of M/s MEPL who seats at corporate office located in Noida telephonically informs Shri Manoj Kumar, Senior Officer regarding the dispatches.
- *M/s MEPL, Jammu raised invoices based on the details provided by corporate office telephonically.*
- The arrangements of transport of raw material or finished goods are also managed and controlled by corporate office, and M/s MEPL, Jammu had not entered into any agreements with the transporters.

5.2 STATEMENTS OF THE KEY PERSONS OF M/S MEPL, NOIDA RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER:

5.2.1 Statement of Shri Prashant Kumar Singh (Senior DGM (Finance) of M/s MEPL, Noida was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 **(RUD-391)** wherein he *inter alia* deposed that,

- **i.** *M/s MEPL* is engaged in the manufacturing and supply of flexible packaging material such as paper laminates/ Paper Aluminium foil laminate/ Plastic laminates etc., which are mainly used for packaging of Pan Masala and Tobacco products manufactured by various Brand Owners/manufacturers.
- Shri Arvind Gupta and Shri Yogeshwar Singh are the directors of the company.
 Shri Arvind Gupta looks after the administration, finance, production, and accounts of the company. Shri Arvind Gupta is promoter shareholder of M/s MEPL and holds 40% shares of the company.
- **iii.** the marketing team of the company procures orders from various customers, which are both oral and written. When customer approves the sample/design prepared by them, production team manufacture the said quantity of finished



goods and reports the same to dispatch section. Thereafter, dispatch section after getting details of customers to whom supply has to be made generates the invoice and arranges the transportation for the said supply and dispatch the consignment.

 iv. the goods were delivered to the depot of their firm namely, M/s Montage Sales Pvt. Ltd., Delhi; M/s Montage Flexipack Sales Pvt. Ltd., Lucknow; M/s Montage Printpack Sales Pvt. Ltd., Gwalior; M/s Packaging Sales Pvt. Ltd., Jaipur; M/s Montage Global Pvt. Ltd., Daman & Diu; M/s Montage Merino Sales Pvt. Ltd., Valsad.

5.2.2 Statement of Shri Ram Mohan Pandey, AGM of M/s MEPL, Noida, was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 **(RUD-392)** wherein he *inter alia* deposed that,

- i. He supervises the work of dispatch of the finished good and GST related matters. Once marketing department places orders, it is passed on to the production department which acts accordingly and once the finished goods are produced it is duly recorded in the BSR (Bonded Store Report) prepared on daily basis by the production team mentioning the type of goods i.e., HSN, brand imprinted on it, quantity in Kgs and forward this report to the dispatch section. Thereafter, they after getting confirmation from the marketing department, dispatch the finished goods to the customers/clients;
- ii. No agreement has been made with any of the clients/customers. Their marketing department gets verbal orders over the telephone;
- iii. They do not mention any brand name on the sale invoices, only the types of laminate and the HSN are mentioned in the invoices.

5.2.3 Statement of Shri Arvind Gupta, Promoter Director of M/s MEPL, was recorded under Section 70 of the CGST Act, 2017 on 15.11.2021 **(RUD-393)** wherein he *inter alia* deposed that,

- *i.* He is promoter of *M*/s Montage Enterprises Pvt. Ltd., and active director of the company since the company was formed.
- *ii. M/s MEPL is in business of manufacturing of packaging material for foods products which includes, namkeen, milk, oil, Pan Masala/Chewing Tobacco etc.*
- iii. Under his supervision team collects the orders from marketing team and place the same to production team. He takes decisions regarding financial matters and purchase. The marketing team collects orders through purchase orders in writing and verbally and supply is made as per purchase orders.
- **iv.** During the course of his statement dated 15.11.2021, Shri Arvind Gupta was shown a list of 56 firms which were found to be non-existent along with the panchnamas drawn at their registered business premises and was asked how supplies have been made to said non-existent firms. Shri Arvind Gupta showed



his ignorance and stated that as per his knowledge the material was supplied to said firms, as per their purchase order or requirements.

- v. Shri Arvind Gupta was further confronted with the statement dated 02.07.2021 of Shri Pramod Bansal, Prop. of M/s P B Associate wherein he had categorically admitted that no goods were received along with invoices from M/s MEPL; that on the basis of invoices received from M/s MEPL he further issued invoices without supply of goods to other firms; that out of payments received from other firms to whom he had issued invoices the payments were transferred to the accounts of M/s MEPL. Shri Arvind Gupta showed his ignorance and remained non-cooperative and paid no heed to the evidence as recovered and simply stated that he will check and revert.
- **vi.** Further, Shri Arvind Gupta was confronted with the fact that the 56 firms found non-existence as per Annexure-'A', shown to him had wrongfully availed ITC on the basis of invoices issued by M/s MEPL without receipt of goods and had further wrongfully passed on ITC to various firms, he stated that he will check and revert.

5.2.4 Another statement of Shri Arvind Gupta, Promoter Director of M/s MEPL, was recorded under Section 70 of the CGST Act, 2017 on 06.12.2021 **(RUD-394)** wherein he *inter alia* deposed that,

- *i.* 69% shares of company are held by his family & balance 31% by other investors.
- **ii.** On being asked that as per the balance sheet of M/s MEPL, M/s Beetel Vyapar Pvt. Ltd., and M/s Adhyay Equi Prof Pvt. Ltd. are holding share of M/s MEPL, whereas both these companies were found non-existent at their registered business premises, he replied that he will check the companies record and then only reply.
- **iii.** On being asked he stated that he has agreement for technical know-how with *M/s Uflex Limited and for that he made payment to Shri Ashok Chaturvedi. He also stated that the premises of Noida & Malanpur was taken on rent from M/s Uflex Limited.*
- *iv.* Further, on being asked why M/s MEPL and its depots while supplying laminates to Pan Masala/Chewing Tobacco units in the guise of issuing invoices to bogus firms/companies were not reflecting the complete description of goods along with brand whereas complete description was shown on invoices to other customers. He stated that he did not interfere in day-to-day business of the company and hence can't comment.

5.2.5 Statement of Shri Yogeshwar Singh, Ex-Director of M/s MEPL, was recorded under Section 70 of the CGST Act, 2017 on 16.04.2024 (**RUD-395**) wherein he *inter alia* deposed that,

i. He joined M/s MEPL, as GM (Marketing), in 2002. Further, he stated that Mr. Arvind Gupta had given him proposal to become nominated & salary paid



director of M/s MEPL, which he had accepted and from August 2007 to August 2021, he was Nominated Salary Paid Director of M/s MEPL. Further he stated that he resigned from the post of Director on August 2021 and joined M/s MEPL as Chief Marketing Officer.

- **ii.** The marketing team of the company procures orders from various customers, which are both verbal and written, approximate ratio of verbal and written POs is 60:40. When customer approves the sample/design prepared by them, production team manufacture the said quantity of finished goods and reports the same to dispatch section. Thereafter, dispatch section after getting details of customers to whom supply has to be made, generates the invoice and arranges the transportation for the said supply and dispatch the consignment.
- iii. On being asked he stated that on the direction of Shri Arvind Gupta, Promoter Director of M/s MEPL, depots at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad were established and 12 senior marketing personnel of M/s MEPL were made directors of those said 6 depots. The purpose of creation of these depots are to channelized the distribution of packaging materials.
- v. On being shown statement dated 16.06.2021 of Shri Ajay Kumar Tripathi, DGM (Production) of M/s MEPL, Jammu, wherein he stated that no direct communication with the customer is being made by M/s MEPL, Jammu, and Shri Yogeshwar Singh, Director of M/s MEPL telephonically informs Shri Manoj Kumar, Senior Officer regarding the dispatches, he stated that he has gone through the above statement, and put his dated signature in token of having seen the same.
- vi. On being shown statement dated 14.06.2021 of Shri Kapil Dev Sharma, Assistant Manager (Store In-charge Raw Material), and statement dated 15.06.2021 of Shri Pradeep Kumar, Deputy General Manager (Production) of M/s MEPL, Haridwar, wherein they stated that directions regarding production of all the packaging material including quantity and design are being provided by the director of company Mr. Yogeshwar Singh, and all the orders are verbal orders. They also stated that Mr. Yogeshwar Singh is the key persons who takes care of sales of the company. Further, Shri Pradeep Kumar, also stated that the details regarding generation of e-way bills and generation of GST invoice such as party details, quantity etc. are being provided by Mr. Yogeshwar Singh and the same are being generated by Mr. Sanjeev Kumar Singh, Manager Commercial (Dispatch and Logistics), he stated that he has gone through the above statement, and put his dated signature in token of having seen the same.
- vii. On being shown statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur, wherein he stated that all the purchase orders were received verbally from Noida Office, through Shri Yogeshwar Singh, Director of the company. He also stated that they are



supplying the goods to M/s Montage Sales Pvt. Ltd., Delhi, M/s Montage Printpack sales Pvt. Ltd., Gwalior, M/s Montage Flexipack Sales Pvt. Ltd., Lucknow on the directions of Shri Yogeshwar Singh, he stated that he has gone through the above statement, and put his dated signature in token of having seen the same.

- viii. On being shown statement dated 13.03.2024 of Shri Gagandip Singh Bawa, Ex-Director, and statement dated 16.03.2024 of Shri Sushil Singh, Ex-Director of M/s Montage Printpack Sales Pvt. Ltd., Gwalior, wherein they stated that in September 2019, the directors (Shri Arvind Gupta & Shri Yogeshwar Singh) of M/s MEPL were planning a new business model for the distribution of packaging materials, and for that M/s MEPL has created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel were made directors of said 6 depots, he stated that he has gone through the above statement, and put his dated signature in token of having seen the same. Further, he stated that he can't make any comment on the same, because the decision to create depots was taken by Shri Arvind Gupta.
- ix. On being shown statement dated 02.07.2021 of Shri Pramod Bansal, Proprietor of M/s P.B. Associates (07ADNPB7822K1ZC), wherein he stated that from July 2017 to December 2017, he received cash through Shri Yogeshwar Singh (Director of M/s MEPL), and the said cash was deposited by him in his and his wife's account and after deducting his commission from the said payment he transferred remaining amount to the account of M/s MEPL (11061310000131), he stated that he has gone through the above statement, and put his dated signature in token of having seen the same. Further, he stated that he can't make any comment on the same, because he never met Shri Pramod Bansal.
- **x.** On being shown a list of 86 firms/companies to whom M/s MEPL had shown supply during the period 2017-18, 2018-19, and 2019-20 to the value of Rs. 3500 Crore (including GST), whereas all these firms were found non-existent at their registered business premises, further none of the firm figured in the said list was having any written agreement with M/s MEPL and also not submitted any written purchase order, he stated that he has gone through the above list, and put his dated signature in token of having seen the same. Further, he stated that in respect of firms to which supplies were shown under the direction of Shri Arvind Gupta, he have no information whether the same were existent or not because he never came in contact to any of them.

5.3 STATEMENTS OF THE KEY PERSONS OF M/S MEPL, HARIDWAR RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER:

5.3.1 Statement of Shri Kapil Dev Sharma, Assistant Manager (Store In-charge Raw Material) of M/s MEPL, Haridwar was recorded under Section 70 of the CGST Act, 2017 on 14.06.2021 (**RUD-396**) wherein he *inter alia* deposed that,



- *M/s MEPL, Haridwar manufactures packaging material mainly for pan masala companies e.g., Kamla Pasana, Vimal, Miraj, Nazar, Shudh Plus, Dilbagh, Dilruba, OMG and some Biri brands.*
- The directions regarding production of all the packaging material including quantity and design are being provided by the director of company Mr. Yogeshwar Singh. Further, all the direction regarding production are verbal orders.
- On being asked he stated that **they did not maintain any brand wise production record in the company**. On being asked he stated that as per his knowledge no agreements had been executed with any of the buyers.
- On being asked he stated that under the product description Printed Paper Aluminium Foil Laminates and Printed Paper Laminates is reflected on invoices issued to M/s MSPL, Delhi; M/s MFSPL, Lucknow; M/s MPSPL, Gwalior, and M/s MPSPL, Jaipur. That they had supplied the packaging material of Kamla Pasand, Shudh Plus, Miraj, Vimal, Dilruba, Rajshree, Nazar, & other Pan Masala/Chewing Tobacco manufacturers.
- Mr. Yogeshwar Singh is the key persons who takes care of sales of the company.

5.3.2 Statement of Shri Sanjeev Kumar, Manager (Commercial) of M/s MEPL, Haridwar was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 (**RUD-397**) wherein he *inter alia* deposed that,

- *M/s MEPL, Haridwar manufactures packaging material mainly for pan masala companies The company receive purchase orders from some of the buyers via email and others place purchase order over telephone.*
- M/s MEPL, Haridwar is engaged in supply of three types of packaging material i.e., Printed Paper Aluminium Foil Laminates, Printed Paper Laminates, and Flexible Plastic Packaging Material Laminates.
- under the product description Printed Paper Aluminium Foil Laminates and Printed Paper Laminates, they had supplied the packaging material of Kamla Pasand, Shudh Plus, Miraj, Vimal, Dilruba, Rajshree, Nazar, & other Pan Masala/Chewing Tobacco manufacturer.
- during the recent past few months, they had supplied a major part of their manufactured packaging material of all brands of pan masala to M/s MSPL, Delhi; M/s MFSPL, Lucknow; M/s MPSPL, Gwalior, and M/s MPSPL, Jaipur and partly to the actual companies of the said brands of Pan Masala. Further, he stated that previously they had also supplied the said manufactured packaging materials to some other firms and companies too.



5.3.3 Statement of Shri Pradeep Kumar, Deputy General Manager (Production) of M/s MEPL, Haridwar was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 **(RUD-398)** wherein he *inter alia* deposed that,

- the directions regarding manufacturing of all the packaging material regarding brand, quantity, quality, and design etc. are being received from Mr. Yogeshwar Singh, Director of M/s MEPL, verbally over telephone.
- they do not maintain any brand-wise record of production.
- they had supplied Printed Paper Aluminium Foil Laminates and Printed Paper Laminates to M/s MSPL, Delhi, M/s MFSPL, Lucknow and M/s MPSPL, Jaipur.
- the details regarding generation of e-way bills and generation of GST invoice such as party details, quantity etc. are being provided by Mr. Yogeshwar Singh and the same are being generated by Mr. Sanjeev Kumar Singh, Manager Commercial (Dispatch and Logistics).

5.3.4 Statement of Shri Rambilas, Deputy Manager (Accounts) of M/s MEPL, Haridwar was recorded under Section 70 of the CGST Act, 2017 on 14.06.2021 **(RUD-399)** wherein he *inter alia* deposed that,

- M/s MEPL manufactures packaging material for various Pan Masala such as Kamla Pasand, Vimal, Miraj, Nazar, Shudh Plus, Dilruba, Dilbagh.
- they had supplied Printed Paper Aluminium Foil Laminates and Printed Paper Laminates to M/s MSPL, Delhi, M/s MFSPL, Lucknow and M/s MPSPL, Jaipur.
- *Mr. Yogeshwar Singh* is the key persons who takes care sales of the company.

5.4 STATEMENTS OF THE KEY PERSONS OF M/S MEPL, MALANPUR RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER:

5.4.1 Statement of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 **(RUD-400)** wherein he *inter alia* deposed that,

• On being shown Print outs of some parts of the data available on the Desktop of the computer hp s/n INI73205DD in the folder CLOSING MAY [C:/Users/HP_PC/ Desktop/CLOSING MAY] and from Excel Files namely, PIASTIC, PAWAAA & POUCH, he stated that the said data is maintained by him, and the print out taken from the folder CLOSING MAY, contain details of datewise production and clearance of finished goods, Laminate & Pouch, manufactured by M/s MEPL, Malanpur during the month of May, 2021 and summary of closing BSR as on 31.05.2021 are given. Further, he stated that in the print out taken from the excel file PLASTIC, & POUCH, opening of pouch as



14.06.2021 and the print out taken from the excel file PAWAAA, details of datewise & item-wise production and clearance of Laminate & Pouch for the month of June, 2021 (up to 14.06.2021) are given. on being asked about the details of production & clearance for other months other than May & June, 2021, he stated that he prepares the data for a particular month by way of renaming old month file and overwriting the date and data for the said particular month. Thus, the details of production & clearance of laminate and pouch for the previous months are not available on the computer.

- On being shown the print out taken from the folder CLOSING MAY on the desktop of computer hp s/n INI73205DD, clearance of many products are shown such as clearance of KARAMCHAND P/M RS 4/- on 01.05.2021 and 06.05.2021 as 2040.16 Kg & 4624.49 Kg respectively, he submitted the copy of Invoice No. M052122/890 dated 01.05.2021 and Invoice No.M052122/995 dated 06.05.2021 respectively in respect of clearance of aforesaid goods.
- On being asked to explain that why the Invoice No.M052122/890 dated 01.05.2021 and Invoice No.M052122/995 dated 06.05.2021, having aluminium foil laminate with Karamchand brand is being cleared to M/s Montage Printpack Sales Pvt. Ltd., Gwalior, he stated that the same is being done as per the directions of Shri Sunil Tiwari, Sr. Manager of M/s Montage Enterprises Pvt. Ltd., Malanpur.

5.4.2 Statement of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 **(RUD-401)** wherein he *inter alia* deposed that,

- all the purchase orders were received verbally from Noida Office, through Shri Yogeshwar Singh, Director of the company.
- On being asked to explain that during Examination of Packing Section, it was found that there was facility of generating Job code for each packaging box and packaging slip generated is fixed on the carton. There was a system installed on packing line on which job code for each packing box is being fed. From there a sticker was being generated and that was fixed on the packing box for general food items. The Sticker contains the details of Consumer of the packaging material. However, it was found that in case of Pan Masala no job code was being entered and no sticker was being generated. Each carton of packing material was packed in white woven bags and no sticker containing details of consumer of packing material was found on them. He stated that as per requirement of Customer such demarcation was done.
- On being shown the print out taken from his computer (Service Tag No: 7LKHT12 & Express Service Tag: 165416891342) from the File Name E:\BACKUP DATA 2-10-20\SUNUL T\Downloads\bsr of less 40 ton Feb 2020, BSR as on Feb 2021, BSR as on May 20, BSR as on May 2021, he stated these are



BSR (Balance Stock Register) of that particular date and it indicates closing stock on that date.

- On being asked he stated that only printed packaging materials were supplied from their unit and as clear from the stock position maximum printed material pertains to Pan Masalas.
- On being asked that as per sales ledger it appears that most of the printed packaging material is being supplied to M/s Montage Sales Pvt. Ltd., Delhi, M/s Montage Printpack sales Pvt. Ltd., Gwalior, M/s Montage Flexipack Sales Pvt. Ltd., Lucknow, Montage Packaging Sales Pvt. Ltd., Jaipur, he stated that these are the trading firms and they supply printed material to them (belonging to other firms). Further, he stated that they are supplying the goods to the above said companies on the directions of Shri Yogeshwar Singh.

5.5 STATEMENTS OF THE KEY PERSONS OF M/S MSPL, DELHI RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER.

5.5.1 Statement of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi, was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 **(RUD-402)** wherein he *inter alia* deposed that,

- some of their buyers issue POs namely VSG Pan Product, Adani Wilmer, TRDP Happyworld, VRS foods, Tower Nuts, Sothern India, Tejram Dharampal, Izux Impex, etc., but most of the buyers did not issue POs such as M/s Azad Trading, M/s Kailash Enterprises, M/s Kavita Industries, M/s Pradhan Trading Company, M/s Pramod Traders, M/s Ravi Kumar Suppliers, M/s Shree Shyam Trading Company, M/s Vikas Trading Company, M/s H K Enterprises, M/s Jyoti Traders, M/s Kumar Enterprises, M/s Neeraj Enterprises, M/s ST Traders, etc.
- Mr. Jasmeet Singh and Mr. Harvinder Singh Matharu are the Directors of M/s MSPL and on their instruction supplies to all those parties were made who do not place Purchase Orders.
- Mr. Harvinder Singh Matharu provides the GSTIN certificate to him and he makes a ledger in respect of all parties who do not issue any purchase order and Mr. Harvinder Singh Matharu selects transporter through which the goods are to be sent to those buyers. Accordingly, they make invoices in respect of such buyers.
- the code/ brand name/ lot number pasted on the goods is used to establish the type of goods and its respective buyer, sometimes Mr. Harvinder Singh Matharu calls him and informs that certain goods are coming and will be sold to certain buyer. He also stated that no specification of goods is mentioned on the invoices. Also, they do not keep any record of materials



that had already sent to their buyers, they receive a packing list with the invoices and the same is forwarded to the buyer and no record of the same is maintained by them as it is directed by Mr. Harvinder Singh Matharu that no record of material already sent will be kept in office.

• Mr. Harvinder Singh Matharu contacts all their buyers and he only decide which goods are to be sent and how to be sent. Further, the payment is received in the bank account and same is also controlled by Mr. Harvinder Singh.

5.5.2 Statement of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi was recorded under Section 70 of the CGST Act, 2017 on 15.06.2021 and 24.09.2021 **(RUD-403)** wherein he *inter alia* deposed that,

- *M/s MSPL receives supply from manufacturing units of M/s MEPL, located at Noida, Jammu, Malanpur & Haridwar.*
- on being shown list of buyers at page no. 11 to 20 of file no. 19 which was seized from M/s Montage Sales Pvt. Ltd., Delhi, under Panchnama dated 14/15.06.2021, he stated that he has seen the same and put his dated signature on the same in token of having seen the same and in its authenticity. Further, he stated that the material was supplied to those buyers on the direction of Shri Harvinder Singh Matharu and Shri Jasmeet Singh, Directors of M/s MSPL.
- Mr. Harvinder Singh Matharu provides the GSTIN certificate to him and he makes a ledger in respect of all those parties who do not issue any purchase order and Mr. Harvinder Singh Matharu selects transporter through which the goods are to be sent to those buyers. Accordingly, they make invoices in respect of such buyers.
- the material received by M/s MSPL are verified by security guards and thereafter the security staff send the signed bill to the store department. The store department makes a GIN (Goods Inward Note) of material and send those bills to the accounts department, and after that accounts department checks all the details of the invoice.
- Mr. Harvinder Singh Matharu calls him and informs that certain goods are coming and the same will be sold to certain buyer. He also stated that no specification of goods is mentioned on the invoices and they do not keep any record of materials that had already been sent to their buyers, they receive a packing list with the invoices, and the same is forwarded to the buyer and no record of the same is maintained by them as it is directed by Mr. Harvinder Singh Matharu that no record of material already sent is to be kept in office.
- on being confronted with the Panchnama drawn at the registered premises of firms to whom M/s MSPL, Delhi had shown supply of the



packaging material/laminate and found to be non-existent/nonoperational at their registered addresses he answered that on the instruction of Shri Harvinder Singh Matharu, he prepares invoices and loads the goods in the vehicles as informed by him, but he did not have any information, whether the said goods reach the destination or not.

- on being confronted with the Panchnama drawn at the residential premise of Shri Sujeet Kumar Singh, owner of M/s BTCPL, and statement of Shri Sujeet Kumar Singh he signed the same and in his agreement.
- on being shown the file @ Sl.No. 17 of INS-02 of the Panchnama dated 25.06.2021 drawn at the residential premise of Shri Sujeet Kumar Singh, and asked to explain the entries he explained one entry on page no. 248. The first entry vehicle number is mentioned as 5236 and the driver is Dinesh, on 01.06.2021 invoice was issued to M/s Blue Star whereas the goods were delivered to factory of Tansen in Patparganj. Further, **he stated that from the entries in the said file, it is evident that goods which were removed from the premise of M/s MSPL in the name of fake firms were actually delivered to the Pan Masala/Tobacco manufacturer**.

5.5.3 Statement of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi was recorded under Section 70 of the CGST Act, 2017 on 15.11.2021 **(RUD-404)** wherein he *inter alia* deposed that,

- in the year 2001 he joined M/s MEPL, as Marketing Executive and resigned from M/s MEPL in the year 2019. Further, in October 2019 depots were established by M/s MEPL at Delhi, Jaipur, Lucknow, Gwalior, Silvassa & Vapi and he was made director of one such depot located at Delhi in the name & style of M/s Montage Sales Pvt. Ltd. M/s MSPL, Delhi has entered into an agreement with M/s MEPL according to which M/s MSPL, Delhi was to sell goods manufactured by M/s MEPL only.
- Shri Arvind Gupta and Shri Yogeshwar Singh are the director of the company, and he reported to Shri Arvind Gupta during his work at the company. He was working on the direction of Shri Arvind Gupta.
- Most of the buyers' place purchase order telephonically/verbally. In some cases, the purchase order is in writing. As per the purchase order design and specification the company manufacturer the goods and deliver to the said firms/company.
- M/s MSPL, Delhi was created to look after the sale of M/s MEPL, in region of Delhi & UP.
- On being shown statements of Shri Punit Kumar Mishra, Sr. Account Officer and Shri Sushil Kumar Dwivedi, Dispatch Officer of M/s MSPL, Delhi, he signed the same in his agreement.



- On being shown a list of 66 firms to whom M/s MSPL, Delhi, had shown supplies during the period 05.10.2019 to 14.06.2021 along with panchnama drawn at the premises of the said firms. Further, he stated as per the panchnama the firms were found non-existent/non-operational at their registered premises, but he avoided reply as to how supplies were made by M/s MSPL, Delhi to those firms.
- on being shown the file @ Sl.No. 17 of INS-02 of the panchnama dated 25.06.2021 drawn at the residential premise of Shri Sujeet Kumar Singh, and his statement dated 25.06.2021, wherein he (Sujeet) admitted transporting laminate to different Pan Masala manufacturer supplied by M/s MSPL, Delhi in the name of non-existent/fake firms and asked to offer comments. He stated that he had seen file @ Sl.No. 17 and statement of Shri Sujeet Kumar Singh and have signed the last page of the statement and first and last page of the file in his agreement.
- Shri H.S. Matharu was shown entry on page number 234 of file @ Sl.No. 17 resumed under Panchnama dated 25.06.2021 which reflected details of goods sold in May 2021, along with invoice no. 865 & 866 issued on 02.05.2021 to M/s Convergent Alliance and M/s Blue Star. As per entry on page number 234 of file @ Sl.No. 17 the goods pertaining to various Pan Masala/ Tobacco was supplied by M/s MSPL. He stated that he has seen entries on page no.234 of file @ Sl.No. 17 resumed under Panchnama dated 25.06.2021 and also invoices number 865 & 866 dated 02.05.2021. He admitted that invoices in the said cases had been issued to different firms and goods were supplied to the actual manufacturer i.e., Ganesh and Sudarshan Pan Masala.
- Shri H.S. Matharu was also shown the sheet no. 29 resumed under Panchnama dated 15.11.2021 drawn at his residential premise which reflects details of goods supplied on 27.12.2020 as under,

Invoice No.	Date	Item Name	Qty. (kg)	Total Value
1704	27.12.2020	H/R Moong dal	7983.46	2045778
1705	27.12.2020	TS-6	5694.44	2040332
1706	27.12.2020	Padamshree P/m	951.10	322342
1707	27.12.2020	Kamla Pasand	8284.05	3541269
1708	27.12.2020	Real Tone Henna Lemon Herbal	2276.83	591508
1709	27.12.2020	TS-2	5460.66	1999008
1710	27.12.2020	TS-2	4507.85	1587202
1711	27.12.2020	Swagat Tobacco	1600	675466
1712	27.12.2020	Kuber Tobacco	2680.90	971983

On verification of these details with the invoices issued by M/s MSPL, Delhi it was observed that invoices pertaining to goods/laminate of various Pan Masala/Tobacco were being issued to dummy/non-existent firms. SHRI H.S. Matharu was asked to offer comments.



He stated that these details are already contained in file @ Sl.No. 17 resumed under panchnama dated 25.06.2021 drawn at the residential premise of Shri Sujeet Kumar Singh. He refrained from commenting further of the same.

5.5.4 Statement of Shri Jasmeet Singh, Director of M/s MSPL, Delhi was recorded under Section 70 of the CGST Act, 2017 on 26.04.2022 (**RUD-405**) wherein he *inter alia* deposed that,

- he joined M/s MEPL, Noida in September 2003 as Manager (Sales & Marketing) and was gradually promoted to General Manager (Sales & Marketing. In mid-2019 M/s MEPL was planning a new business model for the distribution of packaging materials, so he was approached by his senior colleague Shri Harvinder Singh Matharu for starting a company. They formed a company namely M/s MSPL, Delhi.
- during his tenure in M/s MEPL, Noida his responsibility was to develop/get the new business order which were written or verbal as per the practice of the customer. Once the packaging material was ready the same was handed over to the dispatch department for delivery to the customer end as agreed by the said buyer company and sometimes the customer collected the finished goods from the factory itself.
- *M/s MSPL*, Delhi purchased entire goods from the factories of *M/s* Montage Enterprises Pvt. Ltd., located at Noida, Malanpur, Jammu & Haridwar. *M/s MSPL* placed order to *M/s MEPL*, Noida, and the decision to manufacture goods at which factory of *M/s MEPL*, is taken at Noida only and once the goods are manufactured the same are delivered to *M/s MSPL*, Delhi. Being director of *M/s MSPL*, he was looking after the new product business development of the company, and Shri Harvinder Singh takes all the key decisions for the development of the overall business of the company.
- on being shown statements of Shri Punit Kumar Mishra, Sr. Account Officer and Shri Sushil Kumar Dwivedi, Dispatch Officer of M/s MSPL, Delhi, he signed the same in his agreement.
- on being shown statements of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi, he signed the same in his agreement.

5.6 STATEMENTS OF THE KEY PERSONS OF M/S MFSPL, LUCKNOW RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER:

5.6.1 Statement of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow, was recorded under Section 70 of the CGST Act, 2017 on 14.06.2021, **(RUD-406)** wherein he *inter-alia* deposed that,

• *M/s MFSPL, Lucknow had supplied goods (packaging material and laminates)* to 1. *M/s Chandan Trading Company, Lucknow 2. M/s Prashant Trading Company, Lucknow, 3. M/s Shiva Enterprises, Kanpur Nagar, 4. M/s Kritika*



Trading Company, Ghaziabad, 5. M/s Naresh Sales, Lucknow 6. M/s Lawanya Trading Company, Lucknow, 7. M/s KC Laminates, Lucknow 8. M/s Durga Trading Company, Lucknow 9. M/s Rabindra Laminates, Kanpur, 10. M/s Sharwan Packaging, Lucknow, 11. M/s Shivam Enterprises, Lucknow and 12. M/s SV Traders. He was not aware about the existence of aforesaid firms and on verbal directions from their directors they had supplied them the required goods. He also stated that some time the representatives of the firms/companies directly come to their depot for purchase of desired laminates/packing materials.

• on being asked he stated that they had supplied goods on credit to M/s Sharwan Packasing, M/s Shivam Enterprises, and M/s SV Traders on verbal direction from their Directors Shri Sandeep Jain and Shri Nikhil Agnihotri.

5.6.2 Statement of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow, was recorded under Section 70 of the CGST Act, 2017 on 14.06.2021 & 13.05.2022 (**RUD-407**) wherein he *inter-alia* deposed that,

- from 1999 to 2004, he was an employee of M/s Uflex Limited. In 2004 he joined as Divisional Executive in M/s MEPL, Noida.
- in September 2019, the owner of M/s MEPL planned a new business model for the distribution of packaging materials, and for that M/s MEPL has created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel of M/s MEPL were made directors of said 6 depots. He and Shri Sandeep Jain were made directors of M/s MFSPL, Lucknow.
- he was posted at M/s MSPL, Delhi as General Manager (Marketing), by M/s MEPL till November 2021, and thereafter again joined M/s MEPL as General Manager (Marketing).
- all the goods were purchased from M/s MEPL only because M/s MFSPL, Lucknow entered into an agreement with M/s MEPL which restricted M/s MFSPL, Lucknow to make purchase only from M/s MEPL. The role of M/s MFSPL, Lucknow is to sell the goods purchased from M/s MEPL at price which were decided by M/s MEPL.
- *M/s MFSPL looks after trading of goods manufactured by M/s MEPL in Central and Eastern Uttar Pradesh*. On the directions of *M/s MEPL they sell the entire consignment to parties*.
- the initial capital invested was Rs. 1 lakh (Rs 50 thousand by each director). The initial expenditure for establishment of M/s MFSPL was borne by M/s MEPL. The goods supplied by M/s MEPL to M/s MFSPL was on 100% credit and payment is made only after it had been received from their customer. The entire responsibility for collection of payment from their buyers relied on M/s MEPL except for the customers who have been



developed through their marketing division for which responsibility of payment collection lies with M/s MFSPL.

- his gross salary as GM (Marketing) in M/s MEPL was Rs.1,90,932/- and he was getting the same salary i.e., Rs.1,90,932/- as director of M/s MFSPL, Lucknow. Further, he stated that during the last four years he was getting the same salary whether working with M/s MEPL, M/s MFSPL, or M/s MSPL.
- a list of 25 firms/companies to whose M/s MFSPL, Lucknow, has shown supply and panchnama drawn at their registered premises was shown to him, he had seen the same and put his dated signature on the said list, and in agreement with the content of the said panchnama, he put his dated signature on panchnama. Further, he stated that from the panchnama it appears that those firms were found non-existent/non-operational at their registered premises. Further, he stated that the supply to those firms was made on the direction of Shri Arvind Gupta, director of M/s MEPL and even the payment collection and contact to those buyers were also managed by M/s MEPL.

5.6.3 Statement of Shri Sandeep Jain, Ex-Director of M/s MFSPL, Lucknow, was recorded under Section 70 of the CGST Act, 2017 on 07.06.2022 **(RUD-408)** wherein he *inter-alia* deposed that,

- he joined M/s Flex Industries Ltd., in 1999, as marketing officer and was posted at Kanpur. In year 2002 he joined as Executive Officer in M/s MEPL and remain posted at Kanpur.
- in September 2019, the owner of M/s MEPL planned a new business model for the distribution of packaging materials, and for that M/s MEPL has created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel of M/s MEPL were made directors of said6 depots. He and Shri Nikhil Agnihotri were made directors of M/s MFSPL, Lucknow.
- his gross salary as Senior Divisional Manager (Marketing) in M/s MEPL was Rs.1,26,713/- and he was getting the salary i.e., Rs.1,39,212/- as director of M/s MFSPL, Lucknow and at present as Senior Divisional Manager (Marketing) in M/s MEPL he was getting the same salary i.e., Rs.1,39,212/-. Further, he stated that during the last three years he was getting the same salary whether working with M/s MEPL, Noida or M/s MFSPL, Lucknow.
- on being shown the statement dated 14.06.2021 and 15.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow, he signed the same in his agreement.
- on being shown the Goods Sale and Purchase Agreement dated 19.09.2019 executed between M/s MFSPL, Lucknow and M/s MEPL, he stated that the terms and conditions described in the said agreement are well in his knowledge and all conditions were fulfilled by them;

- a list of 25 firms/companies to whom M/s MFSPL, Lucknow, had shown supply and panchnama drawn at their registered premises were shown to him. He signed the list and panchnamas in his agreement. Further, he stated that from the panchnamas it appeared that those firms were found non-existent/nonoperational at their registered premises. Further, he stated that the supply to those firms was made on the direction of Shri Arvind Gupta, director of M/s MEPL and even the payment collection and negotiation with those buyers were also managed by M/s MEPL.
- on being shown the complaint of Shri Rohit Kumar Proprietor of M/s Rohit Enterprises, Shri Shravan Kumar Proprietor of M/s Shravan Packaging, Shri Bhola Shankar Dwivedi Proprietor of M/s Shivam Enterprises, and Shri Shivam Giri, Proprietor of M/s Jai Bhole Enterprises addressed to the Police Commissioner, Lucknow, he has no information in respect of the above-said firms. Further, he stated that he never come in contact with those persons and does not know how they get his details. Shri Arvind Gupta, Director of M/s MEPL, Noida is the proper person to reply in this regard.
- On being shown the bank statements of M/s K N Traders (A/c Number 034863300004027), and M/s Jyoti Traders (A/c Number 034863300004039), and asked that as per the statements both the above firms made payments to M/s MFSPL, Lucknow, whereas as per GSTR-1M of M/s MFSPL, Lucknow no outward supplies were made to both the above firms, he stated that he has no information in respect of both the above-said firms. Further, he stated he did not know why the said payment were made to M/s MFSPL, Lucknow as reflected in the above statements. Shri Arvind Gupta, director of M/s MEPL, is the proper person to reply in this regard.

5.6.4 Statement of Shri Anil Sharma, Ex-Director of M/s MFSPL, Lucknow, was recorded under Section 70 of the CGST Act, 2017 on 11.05.2022 **(RUD-409)** wherein he *inter-alia* deposed that,

- Shri Arvind Gupta and Shri Yogeshwar Singh are the directors of M/s MEPL. Shri Arvind Gupta is the promoter director of the company and looks after the business development of the company. Shri Yogeshwar Singh is the Marketing Head of the company and supervises the marketing team.
- *M/s MFSPL, Lucknow receives orders from its buyers mainly through verbal communication, and after receipt of the order marketing team places orders to manufacturing units of M/s MEPL, and the goods are delivered to the premise of M/s MFSPL, Lucknow on FOR basis.*
- On being shown the statement dated 14.06.2021 of Shri Nikhil Agnihotri, Director of M/s MFSPL, Lucknow, he agreed with the same and put his dated signature in his agreement. Further, he stated that he is fully agree with the facts and figures of the said statement.



• On being shown a list of 25 firms/companies to whom M/s MFSPL, Lucknow, had shown supply as per GSTR-1M and panchnamas drawn at their registered premises, he signed the list and panchnamas in his agreement.

5.7 STATEMENTS OF THE KEY PERSONS OF M/S MPSPL, GWALIOR RECORDED DURING THE INVESTIGATION IS SUMMARIZED HEREUNDER:

5.7.1 Statement of Shri Anand Sharma, Deputy Manager of M/s MPSPL, Gwalior, was recorded under Section 70 of the CGST Act, 2017 on 14.06.2021 **(RUD-410)** wherein he *inter-alia* deposed that,

- *M/s MPSPL, Gwalior is engaged in trading of Printed Laminate, Plastic Film, Printed Paper Laminate, Printed Foil Laminate;*
- On being asked he stated that the above stated goods were purchased from the manufacturing units of M/s MEPL located at Malanpur, Noida and Haridwar.
- On being asked that one vehicle (MP07GA5961) found parked in the premise of M/s MPSPL, Gwalior on which Pouches of "Musafir" Pan Masala were loaded he stated that the said goods was purchased from M/s MEPL, Malanpur vide tax invoice no. M052122/1848 dated 14.06.2021 and was to be supplied to M/s Rajat Sales Corporation, Durg, Chhattisgarh.
- On being asked that without having purchase order in respect of the aforesaid goods how the same were loaded, he stated that Shri Devendra Bisht Assistant Manager (Dispatch) is the proper person to reply in this regard.

5.7.2 Statement of Shri Devendra Bisht, Assistant Manager (Dispatch) of M/s MPSPL, Gwalior, was recorded under Section 70 of the CGST Act, 2017 on 14.06.2021 (**RUD-411**) wherein he *inter-alia* deposed that,

- On being asked he stated that he dispatches goods on the basis of verbal & written purchase orders which are mainly passed on to him by Directors Mr. Gagandip Singh Bawa and Mr. Sushil Singh of the company. However, sometime purchase orders also received from marketing personnel Mr. Nishant Shukla, Mr. Aashish Pandey and Mr. Sailendra Upadhaya;
- *He stated that the directors of the company are resides in Delhi;*
- On being shown the statement of Shri Anand Sharma, Deputy Manager of M/s MPSPL, Gwalior he admitted that he received verbal order from Mr. Gagandip Singh Bawa with respect to goods i.e., Pouches of "Musafir" Pan Masala loaded on vehicle (MP07GA5961) and the goods was to be supplied to M/s Rajat Sales Corporation, Durg, Chhattisgarh.
- On being asked he stated that they did not mention the brand name of Pan Masala/Chewing Tobacco on the tax invoices/e-waybill and only in case of goods supplied to other FMCG companies they write the brand name and other details in their invoices.



5.7.3 Statement of Shri Gagandip Singh Bawa, Ex-Director of M/s MPSPL, Gwalior, was recorded under Section 70 of the CGST Act, 2017 on 13.03.2024 **(RUD-412)** wherein he *inter-alia* deposed that,

- he joined as Assistant Manager (Marketing) in M/s MEPL in year 2004, and was posted at Noida. Gradually he was promoted up to the post of Senior Divisional Manager (Marketing).
- in September 2019, the director (Shri Arvind Gupta & Shri Yogeshwar Singh) of M/s MEPL was planning a new business model for the distribution of packaging materials, and for that M/s MEPL has created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel were made directors of said 6 depots. He and Shri Sushil Singh were made directors of M/s Montage Printpack Sales Private Limited, Gwalior. He further stated that he resigned from the post of Director of M/s MPSPL, Gwalior in August 2021, and in December 2021, again joined M/s MEPL, Noida as Senior Divisional Manager (Marketing).
- On being asked he stated that as Senior Divisional Manager (Marketing) he was looking for new business development in various industries requiring the packaging material and giving services to existing customers. He was also required to assist in designing and resolution in respect of quality issues faced by the customers. Further, he stated that he reported Shri Yogeshwar Singh, Director of M/s MEPL during the period he was engaged with M/s MEPL, because he was looking after all the sales & marketing activity of the company.
- On being asked he stated that he and Shri Sushil Singh were appointed as the directors of M/s MPSPL, Gwalior in September 2019. As directors of M/s MPSPL, Gwalior both were playing the same role as they do as in M/s MEPL, i.e., looking for new business development in various industries requiring the packaging material and giving services to existing customers. However, he admitted that during the period he was director of M/s MPSPL, Gwalior, he usually seat at the office of M/s MEPL, Noida and do all the marketing work from Delhi & NCR. He rarely visits the office of the M/s MPSPL, Gwalior. The day-to-day work of M/s MPSPL, Gwalior was looked after by Shri Anand Sharma, Accountant and Shri Devendra Bisht, Dispatch Manager.
- his gross salary as Senior Divisional Manager (Marketing) in M/s MEPL was Rs.1,01,500/- and he was getting the salary i.e., Rs.1,01,500/- as director of M/s MPSPL, Gwalior and at present as Senior Divisional Manager (Marketing) in M/s MEPL he is getting the salary i.e., Rs.1,26,500/-.
- on being shown the Panchnama dated 15.06.2021 drawn at the premise of M/s Montage Printpack Sales Private Limited, Warehouse No. 3, Village-Gahru, Pargana-Bijnore, Khasra No. 1441, Daroga Khera, Lucknow-Kanpur Road, Lucknow, 226012, he signed the same in his agreement.



- on being shown statements of Shri Anand Sharma, Deputy Manager and Shri Devendra Bisht, Assistant Manager (Dispatch) of M/s MPSPL, Gwalior dated 14.06.2021 & 15.06.2021, he signed the same in his agreement.
- on being shown the Goods Sale and Purchase Agreement dated 19.09.2019 executed between M/s MPSPL, Gwalior and M/s MEPL, he stated that the terms and conditions described in the said agreement are well in his knowledge and all conditions were fulfilled by them;
- a list of 13 firms/companies to whom M/s MPSPL, Gwalior, had shown supply and panchnama drawn at their registered premises were shown to him. He signed the list and panchnamas in his agreement. Further, he stated that from the panchnamas it appeared that those firms were found non-existent/nonoperational at their registered premises. Further, he stated could not say anything in respect of supply made by M/s MPSPL, Gwalior to those firms as the same had been made mainly on ex-works basis and on the direction of Shri Arvind Gupta, director of M/s MEPL and even the payment collection and contact to those buyers was also managed by the staffs of M/s MEPL on the direction of Shri Arvind Gupta.

5.7.3 Statement of Shri Sushil Singh, Ex-Director of M/s MPSPL, Gwalior, was recorded under Section 70 of the CGST Act, 2017 on 16.03.2024 **(RUD-413)** wherein he *inter-alia* deposed that,

- he joined M/s FLEX Industries Ltd., in 1996 as a sales executive and he was posted at Gwalior. In the year 2002, he joined as Sales Executive Officer in M/s MEPL, and was remain posted at Gwalior. Gradually he was promoted up to the post of Divisional Manager (Marketing).
- in September 2019, the director (Shri Arvind Gupta & Shri Yogeshwar Singh) of M/s MEPL was planning a new business model for the distribution of packaging materials, and for that M/s MEPL has created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel were made directors of said 6 depots. He and Shri Gagandip Singh Bawa were made directors of M/s Montage Printpack Sales Private Limited, Gwalior. He further stated that he resigned from the post of Director of M/s MPSPL, Gwalior in August 2021, and in December 2021, again joined M/s MEPL, Noida as Senior Divisional Manager (Marketing).
- On being asked he stated that as Divisional Manager (Marketing) he was looking for new business development in various industries requiring the packaging material and giving services to existing customers. He was also required to assist in designing and resolution in respect of quality issues faced by the customers. Further, he stated that he reported Shri Yogeshwar Singh, Director of M/s MEPL during the period he was engaged with M/s MEPL, because he was looking after all the sales & marketing activity of the company.



- On being asked he stated that he and Shri Gagandip Singh Bawa were appointed as the directors of M/s MPSPL, Gwalior in September 2019. As directors of M/s MPSPL, Gwalior both were playing the same role as they do as in M/s MEPL, i.e., looking for new business development in various industries requiring the packaging material and giving services to existing customers. However, he admitted that during the period he was director of M/s MPSPL, Gwalior, he rarely visits the office of the M/s MPSPL, Gwalior. The day-to-day work of M/s MPSPL, Gwalior was looked after by Shri Anand Sharma, Accountant and Shri Devendra Bisht, Dispatch Manager.
- his gross salary as Divisional Manager (Marketing) in M/s MEPL was Rs.1,04,980/- and he was getting the salary i.e., Rs.1,04,980/- as director of M/s MPSPL, Gwalior and at present as Senior Divisional Manager (Marketing) in M/s MEPL he is getting the salary i.e., Rs.1,16,480/-, since 2022.
- on being shown the Panchnama dated 15.06.2021 drawn at the premise of M/s Montage Printpack Sales Private Limited, Warehouse No. 3, Village-Gahru, Pargana-Bijnore, Khasra No. 1441, Daroga Khera, Lucknow-Kanpur Road, Lucknow, 226012, he signed the same in his agreement.
- on being shown statements of Shri Anand Sharma, Deputy Manager and Shri Devendra Bisht, Assistant Manager (Dispatch) of M/s MPSPL, Gwalior dated 14.06.2021 & 15.06.2021, he signed the same in his agreement.
- on being shown the Goods Sale and Purchase Agreement dated 19.09.2019 executed between M/s MPSPL, Gwalior and M/s MEPL, he stated that the terms and conditions described in the said agreement are well in his knowledge and all conditions were fulfilled by them;
- a list of 13 firms/companies to whom M/s MPSPL, Gwalior, had shown supply and panchnama drawn at their registered premises were shown to him. He signed the list and panchnamas in his agreement. Further, he stated that from the panchnamas it appeared that those firms were found non-existent/nonoperational at their registered premises. Further, he stated could not say anything in respect of supply made by M/s MPSPL, Gwalior to those firms as the same had been made mainly on ex-works basis and on the direction of Shri Arvind Gupta, director of M/s MEPL and even the payment collection and contact to those buyers was also managed by the staffs of M/s MEPL on the direction of Shri Arvind Gupta.

5.8 INVESTIGATION IN RELATION TO FINANCIAL TRANSACTIONS:

5.8.1 Whereas, during the course of investigation it has been gathered Shri Shekhar Kumar Gupta R/o H.No.72, 3rd Floor, Vardan Apartment, I P Extension, Patparganj, Delhi-92, is involved in the creation and management of rotation of fund through various bogus firms, accordingly, the residential premises of Shri Shekhar Kumar Gupta was



searched on 04.01.2022, some crucial documents were unearthed during the search. The search proceeding was recorded under Panchnama and records were resumed under Panchnama dated 04.01.2022 (**RUD-414**).

And whereas, statement of Shri Shekhar Kumar Gupta S/o Late Prayag Kumar Gupta, was recorded under Section 70 of the CGST Act, 2017 on 04.01.2022 **(RUD-415)**, wherein he *inter-alia* deposed that,

- जीवकोपार्जन के लिए tax consultancy, legal matters & share trading का काम करता हूँ,
- उपरोक्त के अलावा Montage Enterprise को फर्जी फर्मो (ऐसी कम्पनीयां जो केवल पेपर पर हैं, उनका कोई physical existence नही हैं, अथवा यदि exist करती हैं तो कोई business नहीं हैं।) का विवरण देता हूँ, जिसमें Montage Enterprise के द्वारा billing किया जाता हैं, बिना किसी मॉल की सप्लाई के। यह काम जनवरी 2021 से सीधे तौर पर कर रहा हूँ, इसके पूर्व यह कार्य श्री गौरव सिंह के माध्यम से करता था।
- श्री गौरव सिंह से वर्ष 2018 में मेरी मुलाकात पार्टी के दौरान हुई थी और उन्होंने अपना परिचय Montage Enterprise के किसी transporter के relative के रूप में दिया था। श्री गौरव सिंह ने बातचीत के दौरान मुझे बताया कि वह Montage Enterprise को फर्जी फर्मो का विवरण देते हैं, जिनमें Montage Enterprise के द्वारा billing की जाती हैं, लेकिन साथ में किसी मॉल की डिलेवरी नहीं की जाती हैं। उन्होनें यह भी बताया कि Montage Enterprise से उन्हें बो मिल जाता हैं और वह उन फर्जी फर्मो के माध्यम से Montage Enterprise से उन्हें बो मिल जाता हैं और वह उन फर्जी फर्मो के माध्यम से Montage Enterprise के account में RTGS/NEFT से वापस कर देते हैं। उन्होंने मुझसे कहा कि यदि मैं उनकी फर्जी फर्मो में यदि किसी तरह से RTGS/NEFT करवा सके तो उसके बदलें में वह cash का प्रबंध कर देंगें और इस काम के लिए एक अच्छा कमीशन भी देंगें। मैने श्री गौरव सिंह की बात को समझ कर कार्य करने के लिए सहमति दे दी।
- चूंकि मैं tax consultancy का काम करता था तो मेरी जानकारी में ऐसी कम्पनियाँ थी जिनको cash की जरूरत होती थी क्योकि वह अपनी कम्पनियों में expenses book करते थे। मैंनें ऐसी कुछ कम्पनियों से बात किया और उनकी सहमति मिलने पर उन्हें कैश देकर श्री गौरव सिंह के द्वारा बताई गई फर्जी फर्मो में RTGS/NEFT करवाने लगा। इस तरह मैं श्री गौरव सिंह के साथ जुड़ा और काम करने लगा। श्री गौरव सिंह ने बताया था कि वह सारा पैसा उन फर्जी फर्मो से Montage Enterprise में चला जाता था। दिसम्बर 2020 तक मैं श्री गौरव सिंह के साथ इस तरह से जुड़ा रहा।
- श्री गौरव सिंह के साथ काम करने के दौरान मेरी मुलाकात श्री राजेश कुमार सिंह जो कि Montage Enterprise में legal consultant हैं से हुई थी, दिसम्बर 2020 में श्री राजेश कुमार सिंह नें कॉल करके मिलने के लिए बुलाया। मैं स्वंय न जाकर अपने साथी श्री संदीप गुप्ता को श्री राजेश कुमार सिंह से मिलने के लिए भेजा। श्री संदीप गुप्ता एंव श्री राजेश कुमार सिंह के बीच में बातचीत में इस बात पर सहमति बनी की अबसे नई फर्जी फर्मो का विवरण हमलोग सीधे Montage को देगें जिसमें Montage के विभिन्न डिपो से बिलिंग की जाएगी। जिसके बाद जनवरी 2021 से मैं और श्री संदीप गुप्ता



मिलकर नई फर्जी फर्मो का arrangement करने लगे, और कुछ लोगो से नए GST registration भी करवाए।

- श्री राजेश कुमार सिंह के बताने के अनुसार हम फर्जी फर्मो का विवरण श्री आर॰एन॰ पाण्डेय जो कि Montage Enterprise में हैं, को देते थे। मेरे द्वारा दिए गए फर्जी फर्मो में Montage Sales Put. Ltd. जो कि Jhilmil Industrial Area में स्थित हैं, और Montage Enterprise का डिपो हैं, से बिलिंग आने लगी बिना किसी मॉल की सप्लाई के।
- श्री मनोज एंव श्री त्यागी जो कि Montage Enterprise, Sector-57, Noida में Cash handling का काम करते हैं, उनसे हमें cash मिलने लगा और हम अपने द्वारा दी गई फर्जी फर्मो के माध्यम से Monatge को RTGS/NEFT से वापस करवाने लगे।
- मेरे द्वारा दी गई सभी फर्मे फर्जी हैं, एवं केवल पेपर हैं उनका अपना कोई अस्तित्व नहीं, और इन सभी फर्जी फर्मो में Monatge द्वारा सिर्फ बिल सप्लाई किए गए हैं, कभी भी किसी प्रकार के मॉल की डिलेवरी नहीं कि गई थी। Monatge द्वारा मॉल की डिलेवरी कहा की जाती थी इसके हमें कोई जानकारी नहीं हैं। नहीं कि गई थी आने लगी बिना किसी मॉल की सप्लाई के। हमारा काम केवल फर्जी फर्मो का विवरण Monatge तक पहुचाना और उसके बदले में Montage से जो कैश आता था, उसको Monatge को RTGS/NEFT वापस करवाना था। जिसके लिए हमें Monatge से प्रति किलोग्राम पर एक रूपया का कमीशन मिलता था।
- 04.01.2022 को मेरे आवासीय परिसर पर बनाए गए पंचनामा को मैनें देखा और देखने एंव सहमति के एवज में उसपर अपने दिनांकित हस्ताक्षर किए। पंचनामा के तहत जब्त एक से पाँच पृष्ठों के बारे में बताना चाहता हूँ कि उनमें उन फर्जी फर्मो का विवरण हैं, जिनकी details हमारे द्वारा Montage को बिना मॉल की Supply के billing करने के लिए दी गई थी। इसके अलावा, पृष्ठ संख्या 1 एंव 2, Montage Sales द्वारा हाल ही में दिया गया sub ledger trail हैं, और इसमें दर्ज विवरण यह हैं कि इन फर्मो में Montage Sales द्वारा उनके सामने अंकित मूल्य के बराबर मॉल सप्लाई के बिल जारी किए जा चुके हैं, पर इन फर्जी फर्मो के Bank Account न होने के कारण इन फर्जी फर्मो के माध्यम से Montage Sales को cash rotation का काम pending हैं। Montage Sales से उपरोक्त sheet श्री पुनीत कुमार मिश्रा जोकि Montage Sales में जो payment बाकी हैं उसे मैं किसी फर्म के माध्यम से Montage Sales के Account में वापस करवा दूं। परन्तु हाल में हुई घटनाओं को ध्यान में रखते हुए मैने इसके लिए मना कर दिया था।

And whereas, the documents in relation to rotation of fund retrieved from mobile phone of Shri Shekhar Gupta **(RUD-416)** is examined vis-à-vis the bank accounts of M/s MSPL, Delhi (50200044023860) and the outcome of analysis is briefly discussed hereunder:



Image 1

	Opening Date :- 21-Jan-2021 Number :- Address :-						
S.N	o Date		Credit Amt(+)	Debit Amt(-)	Note		
1	18-01-202	1 09:21	1515000	0	bal.		
2	18-01-202		the second se	15000000	C		
3	18-01-202			0	shreeshyam trading		
4	18-01-2021			0	vikas trading co.		
5	19-01-2021		and an and a start of a start of the local data and the start of the s	0	kavita industries		
6	19-01-2021	and the owner water water	and the second	0	kavita industries		
7	19-01-2021		and the second se	0	shreeshyam trading		
8	19-01-2021			0	shreeshyam trading		
9	19-01-2021			0	vikas trading		
10	20-01-2021			15000000	C		
11	20-01-2021			0	jagdamba enterprises		
12	20-01-2021			0	guru kripa		
13	20-01-2021			0	vikas trading		
14	20-01-2021			0	vikas trading		
5	20-01-2021	09:28	2000000	0	ganpati enterprise		
6	20-01-2021	09:28	2500000	0	sbc export Itd		
7	21-01-2021	11:07	1600250	0	jagdamba enterprise		
8	21-01-2021	11:07	1550000	0	vikas trading		
9	21-01-2021	11:07	1895000	0	shreeshyam trading		
0	22-01-2021	05:26	1600000	0	ganpati enterprise		
1	22-01-2021	05:26	1535250	0	vikas trading		
2	22-01-2021	05:26	3650000	0	shreeshyam trading		
3	22-01-2021			0	shreeshyam trading		
4	22-01-2021			0	kavita		
5	22-01-2021			0	kavita		
6	22-01-2021			0	kavita		
7	22-01-2021			8800000	c		
B	27-01-2021			10000000	c		
9	27-01-2021	Contract of the local division of the local		0	elfred industries		
0	28-01-2021			0	jagdamba enterprise		
1	28-01-2021			0	ganpati enterprise		
2	28-01-2021			0	vikas trading		
3	29-01-2021			0	shreeshyam trading		
1	30-01-2021			5000000	C		
+ 5	30-01-2021			0	ganpati enterprise		
	30-01-2021			0	kavita industries		
5	30-01-2021			0	vikas trading		
7				1000000	C		
3	01-02-2021			0	vikas trading		
)	02-02-2021			1000000	reversal of 20/1 entry of		
)	03-02-2021				guru kripa		
	03-02-2021	10:42	1200000	0	jagdamba enterprise		
	03-02-2021	10.43	1520000	0	vikas trading		



Image 2

	8
	Account Branch : NOIDA SEC 121
	Address : HDFC BANK LTD.,
	UGF 19, HDMES - 121,
M/S. LAGROWTH ASSOCIATES PRIVATE LIMITED	SECTOR - 121, NOIDA
B-26, B-BLOCK JHILMIL INDUSTRIAL	City : NOIDA 201301
AREA DELHI,.	State : UTTAR PRADESH
EAST DELHI 110095	Phone no. : 18002026151
DELHI INDIA	RTG5/NEFT IFSC : HDFC0004788 MICR: 110240467
	Email : CIRP.LAGROWTHAPL@GMAIL.COM
JOINT HOLDERS :	Limit : 0.00 Currency : INR
	Cust ID : 134068051 Pr.Code : 202 Br.Code : 4788
Nomination : Not Registered	Account No : 50200044023860 PB Customer
Statement From: 12/09/19 To: 29/12/23	A/C Open Date : 12/09/2019 Expected AQE : 25,000.00
	Account Status : Regular

	UNITED POUCHES :SYNDICATE BANK LOT :					
16/01/21	4 NEFT CR-PSIB0000626-KAVITA INDUSTRIES-MONTAGE SALES PVT	SDL74956998	16/01/21		600,000.00	16,292,482.38
16/01/21	LTD-SDL74956998 NEFT CR-PSIB0000626-KAVITA INDUSTRIES-MONTAGE SALES PVT	SDL74957103	16/01/21		900,000.00	17,192,482.38
16/01/21	LTD-SDL74957103 RTGS CR-ICIC0000011-PHONIX TRADERS-MONTAGE SALES PVT	ICICR42021011600 520242	16/01/21		1,500,000.00	18,692,482.38
16/01/21	LTD-ICICR42021011600520242 RTGS CR-ICIC0000011-PHONIX TRADERS-MCNTAGE SALES PVT LTD-ICICR42021011600520220	ICICR42021011600 520220	16/01/21		2,500,000.00	21,192,482.38
17/01/21	RTGS CR-IDFB0010201-JAGDAMBA ENTERPRISES-MONTAGE SALES PRIVATE LIMITED-IDFBR52021011700300048	IDF5R52021011700 300048	17/01/21		500,000.00	21,692,482.38
18/01/21	RTGS DR-UBIN0811668-MONTAGE ENTERPRISES PVT LTD-NOIDA SEC 12-HDFCR52021011869852099	000000000545	18/01/21	20,000,000.00		1,692,482.38
18/01/21	RTGS CR-ICIC0000011-PITA/HBAR PACKAGING-MONTAGE SALES PRIVATE LIMITED-ICICR42021011800507835	ICICR42021011800 507835	18/01/21		1,000,000.00	2,692,482.38
18/01/21	RTGS CR-ICIC0000011-PITA/IBAR PACKAGING-MONTAGE SALES PRIVATE LIMITED-ICICR42021011800507931	ICICR42021011800 507931	18/01/21		1,000,000.00	3,692,482.38
18/01/21	RTGS CR-IDFB0010201-RAVI KUMAR LAMINATES-MONTAGE SALES PRIVATE LIMITED-IDFBR52021011800301864	IDFBR52021011800 301864	18/01/21		2,000,000.00	5,692,482.38
18/01/21	NEFT CR-IDF60010201-SATYANARAYAN TRADERS MONTAGE SALES PRIVATE LIMITED-IDF6H21018050430	IDFBH21018050430	18/01/21		2,000,000.00	7,692,482.38
18/01/21	RTGS CR-BARBØKARDEL-SHREE SHYAM TRADING COMPANY-MCNTAGE SALES PVT LTD-BARBR52021011800857519	BARBR52021011800 857519	18/01/21		1,025,000.00	8,717, <mark>482.38</mark>
18/01/21	RTGS CR-BARBØKARDEL-VIKAS TRADING COMPANY-MCNTAGE SALES P LTD-BARBR52021011800857757	BARBR52021011800 857757	18/01/21		1,050,000.00	9,767,482.38
18/01/21	RTGS CR-INDB0000006-AQUAWHITE RETAIL INDIA PRIVATE LIMI-MONTAGE SALES PVT LTD-INDBR22021011800575050	INDBR22021011800 575050	18/01/21		2,500,000.00	12,267,482.38
18/01/21	RTGS CR-INDB0000006-AQUAWHITE RETAIL INDIA PRIVATE LIMI-MONTAGE SALES PVT LTD-INDBR22021011800575109	INDBR22021011800 575109	18/01/21		550,000.00	12,817,482.38
18/01/21	RTGS CR-SBIN0004184-BHAGWANDAS EDIBLE OILS PRIVATE LIMI-MONTAGE SALES PRIVATE LTD-SBINR12021011807015391	SBINR12021011807 015391	18/01/21		200,000.00	13,017,482.38
19/01/21	CHQ PAID-MICR CTS-NO-PO0JA CELL POINT	000000000542	19/01/21	2,905.00		13,014,577.38
19/01/21	CHO PAID-MICR CTS-NO-SUNIL CHOPRA	000000000524	19/01/21	23,992.00		12,990,585.38
19/01/21	RTGS DR-UBIN0811068-MONTAGE ENTERPRISES PVT LTD-NOIDA SEC 12-HDFCR52021011970121082	000000000545	19/01/21	12,000,000.00		990,585.38
19/01/21	FT - CR - 50200000951380 - SHREENATH	00000000838	19/01/21		400,000.00	1,390, <mark>5</mark> 85.38
19/01/21	TRADERS RTGS CR-IDFB0010201-SATYANARAYAN TRADERS-MCNTAGE SALES PRIVATE	IDFBR52021011900 301775	19/01/21		2,000,000.00	3,390,585.38
19/01/21	LINITED-IDFBR52021011900301775 RTGS CR-IDFB0010201-RAVI KUMAR LAMINATES-MONTAGE SALES PRIVATE LINITED-IDFBR52021011900302094	IDFBR52021011900 302094	19/01/21		2,000,000.00	5,390,585.38
19/01/21	RTGS CR-ICIC00000011-PHONIX TRADERS-MONTAGE SALES PVT LTD-ICICR42021011900509608	ICICR42021011900 509608	19/01/21		1,500,000.00	6,890,585.38
19/01/21	RTGS CR-KKBK0000958-J R AGENCIES-MONTAGE SALES PRIVATE LIMITED-KKBKR52021011900868411	KKBKR52021011900 868411	19/01/21		500,000.00	7,390,585.38
19/01/21	NEFT CR-BARBØMAKARB-AVADH AGENCIES-HONTAGE SALES PVT LTD-BARBT21019033822	BARBT21019033822	19/01/21		51,692.00	7,442,277.38
19/01/21	RTGS CR-IDFB0010201-KAVITA INDUSTRIES-MONTAGE SALES PRIVATE LIMITED-IDFBR52021011900305287	IDFBR52021011900 305287	19/01/21		488,982.00	7,931,259.38
19/01/21	RTGS CR-IDFB0010201-KAVITA INDUSTRIES-MONTAGE SALES PRIVATE LIMITED-IDFBR52021011900305327	IDFBR52021011900 305327	19/01/21		511,018.00	8,442,277.38
19 <mark>/01</mark> /21		BARBR52021011900 926357	19/01/21		3,350,200.00	11,792,477.38
10	Directorate General of Goods and Servic F No DCCL/INV/CST/1757/2021/C#		Meerut Zona	ıl Unit	Page 129	of 230



F.No. DGGI/INV/GST/1757/2021/GRU

19/01/21	RTGS CR-BARBØKARDEL-SHREE SHYAM TRADING COMPANY-MONTAGE SALES PVT	BARBR52021011900 927386	19/01/21	1,250,250.00	13,042,727.38
19/01/21	LTD-BARBR52021011900927386 RTGS_CR-BARB0KARDEL-SHREE_SHYAM_TRADING	BARBR52021011900	19/01/21	2,510,500.00	15,553,227.38
19/01/21	COMPANY-MONTAGE SALES PVT	931342	19/01/21	2,510,500.00	15,555,227.56
	LTD-BAR6R52021011900931342				
19/01/21	NEFT CR-RATN0000999-SMARTPADDLE	000156492896	19/01/21	1,090,605.00	16,643,832.38
	TECHNOLOGY PRIVATE LIMI-MONTAGE SALES PRIVATE LIMITED-000156492896				
19/01/21	NEFT CR-UBIN0912557-MORAJKAR MARKETING	000200076998	19/01/21	50,000.00	16,693,832.38
	PROP ANIL-MONTAGE SALES PRIVATE				
	1 THITTED 000000076000				

And whereas, the document named 'Account Manager' having Party Name as 'MT' (Montage) is pasted as **Image 1** is a sample of documents retrieved from the mobile phone of Shri Shekhar Gupta having the Credit & Debit entries of cash rotation done by him during the period from 18/01/2021 to 03/02/2021 through his various client firms on behalf of M/s MSPL and document pasted as **Image 2** is the bank statement of bank account number 50200044023860 of M/s MSPL, Delhi for the period from 16/01/2021 to 19/01/2021. On sample basis one transaction of cash rotation by Shri Shekhar Gupta is explained as under:

And whereas, in document named 'Account Manager' retrieved from the mobile of Shri Shekhar Gupta, it is seen that on 18.01.2021 at Sl. No. 2 under debit column entry of ₹1,50,00,000/- has been mentioned, which is the entry of cash amount received by Shri Shekhar Gupta from M/s MEPL, and at Sl. No. 3, 4, 5, 6, 7, 8 & 9 Credit entries from the bank accounts of bogus firms (M/s Shree Shaym Trading, M/s Vikas Trading Co., M/s Kavita Industries) to whom M/s MSPL had shown supply has been mentioned and if these credit entries are tallied with the bank account of M/s MSPL, they exactly tally with the transactions dated 18.01.2021 & 19.01.2021 in the bank statements on the same dates as mentioned in the document named as 'Account Manager'.

]	Details of transactions as per document named 'Account Manager'			Details of transactions as per Bank Statement			
Sl. No.	Date	Credit Amt (+)	Note	Date	Narration	Deposit Amt	
3	18/01/202 1	1025000	Shreeshyam Trading	18/01/202 1	RTGS CR-BARBOKARDEL- SHREE SHYAM TRADING COMPANY-MONTAGE SALES PVT LTD- BARBR52021011800857519	1025000	
4	18/01/202 1	1050000	Vikas Trading Co/	18/01/202 1	RTGS CR-BARBOKARDEL- VIKAS TRADING COMPANY-MONTAGE SALES P LTD- BARBR52021011800857757	1050000	
5	19/01/202 1	488982	Kavita Industries	19/01/202 1	RTGS CR-IDFB0010201- KAVITA INDUSTRIES- MONTAGE SALES	488982	



					PRIVATE LIMITED-	[
					DFBR52021011900305287		
					RTGS CR-IDFB0010201-		
	19/01/202		Kavita	19/01/202	KAVITA INDUSTRIES-	0	
6	1	511018	Industries	1	MONTAGE SALES	511018	
					PRIVATE LIMITED-		
					IDFBR52021011900305327		
					RTGS CR-BARBOKARDEL-		
	10/01/000		01	10/01/000	SHREE SHYAM TRADING		
7	19/01/202	· · · · · · · · · · · · · · · · · · ·	Shreeshyam Trading	19/01/202 1	COMPANY-MONTAGE	2510500	
	1				SALES PVT LTD-		
					BARBR52021011900931342		
					RTGS CR-BARBoKARDEL-		
					SHREE SHYAM TRADING		
8	19/01/202	1200250	Shreeshyam		COMPANY-MONTAGE	1200250	
	1		Trading	1	SALES PVT LTD-		
					BARBR52021011900927386		
					RTGS CR-BARBoKARDEL-		
	, ,		1	, ,	VIKAS TRADING		
9	19/01/202	335020	Vikas	19/01/202	COMPANY-MONTAGE	335020	
-	1	1 0000-0 Tra	Trading	1	SALES PVT LTD-		
					BARBR52021011900926357		
I				1			

5.8.2 And whereas, statement of Shri Sandeep Kumar S/o Shri Nandkishore Gupta, was recorded under Section 70 of the CGST Act, 2017 on 04.01.2022 & 19.01.2022 (**RUD-417A**), wherein he *inter-alia* deposed that,

- On being asked, he stated that he along with Mr. Shekhar Kumar Gupta provides details of fake firms to M/s Montage and transfer the cash received in lieu thereof to A/c of Montage through RTGS/NEFT.
- On being shown he has seen the Panchnama dated 04.01.2022 (*RUD-416*) drawn for data retrieval from his OPPO mobile phone resumed under Panchnama data 04.01.2022 from his residence, and put his dated signature in token of his agreement. Further, he also seen the printouts taken from the data retrieved from his mobile phone and put his dated signature on Page No. 1 and Page No. 318 (*RUD-417B*).
- On being asked, he stated that page number 277 was the printout of invoice sent by Montage to him, which was issued by Montage without supply of good in September – 2021 to M/s Aavesh Enterprises.
- On being asked, he stated that number 278 to 313 were the printout of Party Ledger of bogus firms sent by Montage to him, to whom Montage had issued the invoices without supply of goods and according to which they (he & Shekhar) got commission @ rate of ₹ 1 per Kg on the quantity mentioned in the invoices issued by Montage to the bogus forms given by them (he & Shekhar).



- On being asked, he stated that number that page no. 247 to 276 were the printouts of Aadhar Card, PAN Card and Photographs of some persons which were sent to him by Sandeep and Jatin. He further stated that these documents were sent to him for KYC of fake forms given by them (he & Shekhar) to Montage. Sandeep and Jatin used to give him registration details of fake firms which existed only on paper and they (he & Shekhar) further used to give the details of those firms to Montage for issuance of invoices without supply of goods and in return, they used to give 0.60 paise per Kg to Sandeep from the money they (he & Shekhar) got from montage. He also stated that apart from Sandeep and Jatin no one else gave him details of fake firms to further give to Montage.
- On being asked, he stated that he had gone through the printouts of page no. 184 to 246, out of them printout of page no. 190 to 246 were sent by Sandeep and Jatin and those were the registration certificates of fake firms which exist only on paper and they (he & Shekhar) had provided the details of those firms to Montage for issuance of invoices without supply of goods.
- On being asked, he stated that he had seen the printouts of page number 154 to 183 and these were the bank account statements of M/s K.N. Traders and M/s Jyoti Traders for the period 10.01.2021 to 23.01.2021. He further stated that those statement were come to him on his mobile from Yes Bank. He also stated that he had opened the bank account of both the firms in Yes Bank and while opening the bank account he had written his mobile number in the bank account opening form. He also stated that both these accounts were used to do RTGS in exchange of invoices issued by Montage without supply of goods for the fake firms given by them (he & Shekhar) to Montage, RTGS entries used to come in those bank accounts from the fake firms whose details they (he & Shekhar) had given to Montage and further they (he & Shekhar) used to do RTGS to Montage.

And whereas, from the above discussions it appears that Shri Shekhar Gupta and Shri Sandeep Kumar acted as middle persons for providing details of fake firms to M/s MEPL & its depots to issue invoices without supply of goods and rotation of money through various bogus firms in the account of M/s MEPL and its depots and they both in their respective statements unequivocally admitted the aforesaid facts. It also evident that those firms detail of which were provided by Shri Shekhar Gupta and Shri Sandeep Kumar to M/s MEPL depots & its depots were bogus firms, and no supply of goods was made to these firms/companies by M/s MEPL and its depots. Further, it also evident that the payment credited in the bank accounts of M/s MEPL and its depots from these bogus firms was initially provided by M/s MEPL in cash (received from Pan Masala/Chewing Tobacco Manufacturer) to Shri Shekhar Gupta and through various firms/companies the fund was routed to the bank accounts of these bogus firms and finally credited to the bank accounts of bogus firms.



5.8.3 Whereas, a separate investigation was initiated by the DGGI, Zonal Unit, Jaipur against Shri Dipanshu Gupta who was indulged in trading of fake invoices on commission through various bogus firms operated by him. The investigation in relation to Shri Dipanshu Gupta, their employee, Anagadia firms, unearthed the financial transaction among M/s MEPL and Pan Masala manufacturer units through M/s Basic Traders, M/s Imra Sales, M/s Zodiac Traders, M/s P B Associates, M/s Proview Traders, M/s Iconic International etc. During the said investigation statement of Shri Dipanshu Gupta and Shri Sarang Jhunjhunwala, employee of Shri Dipanshu Gupta was recorded the summary of the said statement is briefly discussed hereunder:

i. Statement of Shri Dipanshu Gupta, was recorded under Section 70 of the CGST Act, 2017 on 12.01.2022, wherein he *inter-alia* deposed that,

- he engaged in trading of fake invoices through various firm created and operated by him on commission of 0.5% of taxable value.
- On being shown WhatsApp chat with Shri Vinay Dalmia, Shri Sarang Jhunjhunwala, he stated that he has made WhatsApp group of their employees working for fake bills & recipients of fake bills. He stated that the group that the person who needs a fake bill, ITC, informs on this group. Accordingly, they prepare invoices, E-way bills, transporter bilties and send details on WhatsApp groups. Bank Transaction is also mentioned on this WhatsApp group. Names in the WhatsApp group are not real; the name of Vinit Dalmia is named as Guddu. Further, the name of Shri Sarang Jhunjhunwala is Rahul. This was done in order to hide the identity of the employee.

ii. And whereas, statement of Shri Sarang Jhunjhunwala, Employee of Shri Dipanshu Gupta, was recorded under Section 70 of the CGST Act, 2017 on 17.01.2022 (**RUD-418**), wherein he *inter-alia* deposed that,

- Mohd. Ali Akram Khan was from the supplier side who issue invoices to various fake firms created & operated by Shri Dipanshu Gupta. Further, on the directions of Shri Dipanshu Gupta, he used to transfer funds from the non-existing firms operated by Shri Dipanshu Gupta to the bank account of M/s MEPL against the goods-less invoices received from M/s MEPL. Thereafter, the said amount was refunded back to Shri Dipanshu Gupta through various Angadias by Mo. Ali Akram Khan in cash after deducting his commission amount.
- He stated that, Mohd. Ali Akram Khan contacted him with different mobile numbers during different time period and directed him to save his number in whatever name he provided and as per his direction he saved his mobile number with different name. Previously, he saved his number in the name of Vishal. During Nov-2020, he received a message from new mobile number 9051188097



and telephonically informed him to save this number in the name of Manoj. Thereafter, he received another message from new mobile number 9051466520 on 28.07.2021 and directed him to save this number in the name of Suraj.

- On being perused the printouts of chat with Monoj (9051188097), taken out form • his mobile phone Redmi-8, he stated that he perused the same and stated that in the above said WhatsApp message, Mo. Akram asked him the hisab by sending message as "Plz Send hisab" and then he messaged him the date-wise transaction detail. On 2nd April, opening balance was 520, means they have to made payment ₹5,20,00,000/- against invoices issued by Mo. Akram from various firms operated by him in the name of M/s. Montage, "Received 94" means we received ₹94,00,000/- cash from Mr. Akram through Angadias, "Payment-143" means, we made payment of ₹1,43,00,000/- to various companies related to Mo. Akram and the break-up of such payment is also mentioned in above chat as "M package- 15, m marino-108.5 and multi-19.5" which means ₹15,00,000/- was transferred in the account of M/s Montage Packaging Sales Pvt. Ltd.; ₹1,08,50,000/- was transferred in the account of M/s Montage Marino Sales Pvt. Ltd., and ₹19,50,000/- was transferred in the account of M/s Montage Multi Products Sales Pvt. Ltd., and remaining amount shown as balance i.e. 471, means ₹4,71,00,000/- is pending. Similarly, date-wise transaction details had been sent by him.
- M/s Imra Sales Rajasthan (Prop. Mohd. Ali Akram Khan) was the major supplier of fake invoices till 2019, who issued invoices to various fake firms created & operated by Shri Dipanshu Gupta without actual supply of goods.
- He perused the printouts of excel sheet "akhisab" and in the Sheet 23 and stated that the chart is showing fund transferred by them from fake firms operated by Shri Dipanshu Gupta to various supplier firms from who issued invoices to their firms without actual supply of goods. He also informed that this sheet is the summary sheet of various other sheets available in the said excel sheet "akhisab". Other sheets name is also mentioned like balaji to ps, siddhi vinayak to zodiac, Bharat to Imra, Radhe to Imra. In these names, first name is related to firms operated by Shri Dipanshu Gupta and second name is supplier firm who issue invoices to fake firms operated by Shri Dipanshu Gupta.
- He perused the printouts of excel sheet namely "HISAB" in which date-wise transaction details are mentioned, there are similar six column i.e. Date, Description, Place, Annexure, DR and CR. He stated that in the said sheet there are data related to period 03.11.2017 to 03.11.2018, and during this period, they had received total ₹515,35,00,000/-, out of which ₹498,85,00,000/- was received in cash through Angandiya and remaining through banking channel.



Further, he stated that they had made payment of ₹506,28,16,171/- through banking channel and also received commission amount ₹2,50,00,000/- during the above said period.

- He perused the printouts of excel sheet namely "vishal" in which date-wise transaction details are mentioned. In the said excel sheet "vishal", there are similar six column i.e. Date, Description, Place, Annexure, DR and CR. He stated that in the said sheet there are data related to period 03.12.2018 to 31.10.2019, and during this period, they had received total ₹271,19,06,500/-, out of which ₹269,94,06,500/- was received in cash through Angandiya and remaining through banking channel. Further, he stated that they had made total payment of ₹269,43,95,463/- and out of which ₹266,08,95,463/- was through banking channel, ₹90,00,000/- in cash and also received commission amount ₹2,45,00,000/- during the above said period.
- On being asked he stated that they have received total amount ₹1413,02,01,500/-(in cash) from Montage group and also received commission of ₹8,38,56,400/and made payment ₹1396,85,47,050/- during the period from 03.11.2017 to 22.11.2021, but he don't know about the commission amount. Shri Dipanshu Gupta directed him to make an entry of commission amount in "Cr" part of the said excel sheet mentioning as received. He stated this commission amount was received for providing funds in the banking channel in lieu of cash received. From the above data it is also clear that they have made payment of ₹1397 Crores (Approx.) in the banking channel during the last 4 years for supply of packaging material made by M/s MEPL in guise of fake firms.
- He looked after payment (transactions) related work of various fake firms created & operated by Shri Dipanshu Gupta. In respect of business transactions undertaken between Mohd. Ali Akram Khan (M/s Montage) and various fake firms operated by Shri Dipanshu Gupta. Further, he stated that first he received cash from Mohd. Ali Akram Khan through various Angadias and then he makes RTGS as directed by Shri Dipanshu Gupta from the concerned fake firm.
- On being asked how they got balance in the bank accounts of these fake firms to make payment to M/s Montage through banking channel, he stated that Shri Dipanshu Gupta issued invoices from various fake firms operated by him without supply of goods to various beneficiary firms and get RTGS in the bank account of fake firms from the beneficiary firms and such fund was transferred to M/s Montage. Further, he stated that as and when RTGS were received from beneficiary firms, they had to refund the said amount after deducting commission to these beneficiary firms. Mostly, they refund in cash and sometimes, they also refund the amount through RTGS/NEFT in various bank



accounts as provided by the beneficiary firms. In this transaction, they used the cash amount received from M/s Montage through Angadias.

iii. And whereas, consolidated excels sheet prepared from data found in Server of Shri Dipanshu Gupta viz-a-viz bank a/c statement of M/s Proview Traders for the period 01.08.18 to 31.08.18 is analyzed and same is detailed hereunder:

Date	Description	Place	Annexure	DR	CR
01-Aug-18	Malika To Proview	Surat	Payment		50,00,000
01-Aug-18	Malika To Proview	Surat	Payment		21,00,000
01-Aug-18	Malika To Proview	Surat	Payment		60,00,000
01-Aug-18	Malika To Proview	Surat	Payment		40,00,000
13-Aug-18	Malika To Proview	Surat	Payment		90,00,000
14-Aug-18	Malika To Proview	Surat	Payment		66,00,000
14-Aug-18	Malika To Proview	Surat	Payment		34,00,000
16-Aug-18	Malika To Proview	Surat	Payment		1,00,00,000
18-Aug-18	Fastdeal To Proview	Jaipur	Payment		1,27,60,000
18-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		56,50,000
20-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		87,00,000
20-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		12,00,000
20-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		41,00,000
21-Aug-18	Fastdeal To Proview	Jaipur	Payment		1,22,00,000
21-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		40,00,000
21-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		45,00,000
21-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		46,00,000
21-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		25,35,000
24-Aug-18	Fastdeal To Proview	Jaipur	Payment		49,99,980
24-Aug-18	Fastdeal To Proview	Jaipur	Payment		49,99,980
24-Aug-18	Fastdeal To Proview	Jaipur	Payment		38,00,000
27-Aug-18	Fastdeal To Proview	Jaipur	Payment		15,20,000
27-Aug-18	Fastdeal To Proview	Jaipur	Payment		37,60,000
27-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		41,00,000
28-Aug-18	Fastdeal To Proview	Jaipur	Payment		42,00,000
28-Aug-18	Fastdeal To Proview	Jaipur	Payment		49,99,980
28-Aug-18	Fastdeal To Proview	Jaipur	Payment		49,99,980
28-Aug-18	Fastdeal To Proview	Jaipur	Payment		20,50,000
28-Aug-18	Fastdeal To Proview	Jaipur	Payment		40,25,000
28-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		25,00,000
29-Aug-18	Fastdeal To Proview	Jaipur	Payment		49,99,980
29-Aug-18	Fastdeal To Proview	Jaipur	Payment		31,20,000
29-Aug-18	Fastdeal To Proview	Jaipur	Payment		39,20,000
29-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		23,80,000
29-Aug-18	Fastdeal To Proview	Jaipur	Payment		22,50,000
29-Aug-18	Fastdeal To Proview	Jaipur	Payment		6,70,000
29-Aug-18	Fastdeal To Proview	Jaipur	Payment		15,05,000
29-Aug-18	Shri Malika To Proview	Ahmedabad	Payment		20,00,000

A. Consolidated excels sheet (entry related to M/s Proview Traders)



29-Aug-18	Fastdeal To Proview	Jaipur	Payment	16,00,000
29-Aug-18	Fastdeal To Proview	Jaipur	Payment	13,00,000
30-Aug-18	Shri Malika To Proview	Ahmedabad	Payment	23,00,000
30-Aug-18	Shri Malika To Proview	Ahmedabad	Payment	11,25,000
30-Aug-18	Fastdeal To Proview	Jaipur	Payment	23,65,000
30-Aug-18	Fastdeal To Proview	Jaipur	Payment	35,00,000
31-Aug-18	Fastdeal To Proview	Jaipur	Payment	39,10,000
31-Aug-18	Fastdeal To Proview	Jaipur	Payment	9,40,000

B. A/c statement of M/s Proview Traders (3690477869)

Date	Account Description	DR	CR
01/08/18	By Transfer/Malika Arjun Impex		50,00,000
01/08/18	By Transfer/Malika Arjun Impex		21,00,000
01/08/18	By Transfer/Malika Arjun Impex		60,00,000
01/08/18	By Transfer/Malika Arjun Impex		40,00,000
13/08/18	By Transfer/Malika Arjun Impex		90,00,000
13/08/18	RTGS Montage Enterprises	50,00,000	
13/08/18	RTGS Montage Enterprises	50,00,000	
13/08/18	RTGS Montage Enterprises	50,00,000	
14/08/18	By Transfer/Malika Arjun Impex		66,00,000
14/08/18	RTGS Montage Enterprises	50,00,000	
14/08/18	RTGS Montage Enterprises	50,00,000	
14/08/18	By Transfer/Malika Arjun Impex		34,00,000
16/08/18	By Transfer/Malika Arjun Impex		1,00,00,000
18/08/18	By Transfer/Fast Deals Corporation		49,99,980
18/08/18	By Transfer/Fast Deals Corporation		49,99,980
18/08/18	RTGS Montage Enterprises	50,00,000	
18/08/18	RTGS Montage Enterprises	50,00,000	
18/08/18	By Transfer/Fast Deals Corporation		27,60,000
18/08/18	By Transfer/Malika Arjun Impex		56,50,000
20/08/18	RTGS Montage Enterprises	50,00,000	
20/08/18	RTGS Montage Enterprises	50,00,000	
20/08/18	RTGS Montage Enterprises	50,00,000	
20/08/18	By Transfer/Malika Arjun Impex		87,00,000
20/08/18	By Transfer/Malika Arjun Impex		12,00,000
20/08/18	By Transfer/Malika Arjun Impex		41,00,000
21/08/18	RTGS Montage Enterprises	45,00,000	
21/08/18	RTGS Montage Enterprises	50,00,000	
21/08/18	RTGS Montage Enterprises	50,00,000	
21/08/18	RTGS Montage Enterprises	50,00,000	
21/08/18	By Transfer/Malika Arjun Impex		46,00,000
21/08/18	By Transfer/Malika Arjun Impex		45,00,000
21/08/18	By Transfer/Malika Arjun Impex		40,00,000
21/08/18	By Transfer/Malika Arjun Impex		25,35,000
21/08/18	By Transfer/Fast Deals Corporation		49,99,980
21/08/18	By Transfer/Fast Deals Corporation		49,99,980
21/08/18	By Transfer/Fast Deals Corporation		22,00,000



21/08/18	RTGS Montage Enterprises	45,00,000	
21/08/18	RTGS Montage Enterprises	49,00,000	
21/08/18	RTGS Montage Enterprises	50,00,000	
21/08/18	RTGS Montage Enterprises	50,00,000	
21/08/18	RTGS Montage Enterprises	50,00,000	
24/08/18	By Transfer/Fast Deals Corporation		49,99,980
24/08/18	By Transfer/Fast Deals Corporation		49,99,980
24/08/18	By Transfer/Fast Deals Corporation		38,00,000
27/08/18	RTGS Montage Enterprises	50,00,000	
27/08/18	RTGS Montage Enterprises	50,00,000	
27/08/18	RTGS Montage Enterprises	50,00,000	
27/08/18	By Transfer/Fast Deals Corporation		15,20,000
27/08/18	By Transfer/Fast Deals Corporation		37,60,000
27/08/18	By Transfer/Malika Arjun Impex		41,00,000
27/08/18	RTGS Montage Enterprises	45,00,000	
28/08/18	RTGS Montage Enterprises	50,00,000	
28/08/18	RTGS Montage Enterprises	49,00,000	
28/08/18	By Transfer/Fast Deals Corporation		42,00,000
28/08/18	By Transfer/Fast Deals Corporation		49,99,980
28/08/18	By Transfer/Fast Deals Corporation		49,99,980
28/08/18	By Transfer/Fast Deals Corporation		20,50,000
28/08/18	By Transfer/Fast Deals Corporation		40,25,000
28/08/18	By Transfer/Malika Arjun Impex		25,00,000
28/08/18	By Transfer/Fast Deals Corporation		49,99,980
29/08/18	RTGS Montage Enterprises	50,00,000	1777777
29/08/18	RTGS Montage Enterprises	49,00,000	
29/08/18	By Transfer/Fast Deals Corporation		31,20,000
29/08/18	By Transfer/Fast Deals Corporation		39,20,000
29/08/18	By Transfer/Malika Arjun Impex		23,80,000
29/08/18	By Transfer/Fast Deals Corporation		22,50,000
29/08/18	By Transfer/Fast Deals Corporation		6,70,000
29/08/18	By Transfer/Fast Deals Corporation		15,05,000
29/08/18	By Transfer/Malika Arjun Impex		20,00,000
29/08/18	By Transfer/Fast Deals Corporation		16,00,000
29/08/18	By Transfer/Fast Deals Corporation		13,00,000
30/08/18	RTGS Montage Enterprises	50,00,000	19,00,000
30/08/18	RTGS Montage Enterprises	50,00,000	
30/08/18	RTGS Montage Enterprises	50,00,000	
30/08/18	RTGS Montage Enterprises	50,00,000	
30/08/18	By Transfer/Malika Arjun Impex		23,00,000
30/08/18	By Transfer/Malika Arjun Impex		11,25,000
30/08/18	By Transfer/Fast Deals Corporation		23,65,000
30/08/18	By Transfer/Fast Deals Corporation		35,00,000
31/08/18	RTGS Montage Enterprises	40.00.000	33,00,000
31/08/18	RTGS Montage Enterprises	49,00,000	
31/08/18	RTGS Montage Enterprises	50,00,000	
		49,00,000	
31/08/18	RTGS Montage Enterprises	50,00,000	



31/08/18	RTGS Montage Enterprises	50,00,000	
31/08/18	By Transfer/Fast Deals Corporation		39,10,000
31/08/18	By Transfer/Fast Deals Corporation		9,40,000

And whereas, from the above it appears that from the bogus firms created and operated by Shri Dipanshu Gupta payment was credited to bank accounts of the bogus firms to whom invoices were issued by M/s MEPL, and thereafter these bogus firms make payment to the bank a/c of M/s MEPL and its depots.

5.8.4 Whereas, statement of Shri Ratan Chand, Director of M/s Dealistix India Pvt. Ltd., was recorded under Section 70 of the CGST Act, 2017 on 02.05.2023 (**RUD-419A**), wherein he *inter-alia* deposed that,

- M/s Dealistix India Pvt. Ltd., was registered on 04.08.2020 at G-55, S/F, Vikash Marg, Laxmi Nagar, New Delhi, 110092;
- On being asked he stated that he had thought of doing some business through his company but nothing was coming to fruition. Meanwhile, CA Shri Gaurav Goyal contacted me and proposed that he allow to use his company and its bank accounts to transact some amount in the bank accounts of M/s MFSPL, in return M/s MFSPL would give him some commission. Further, he also informed that for commission income, CA Shri Gaurav Goyal advised him to issue invoice of 'Debt Collection Service Charges' to M/s MFSPL. Further, he informed that all the money came in the company's account is through CA, Shri Gaurav Goyal and CA, Shri Shobhit Agarwal and on their direction, they transfer the said payment to the account of M/s MFSPL.

On being asked he informed that along with M/s Montage Flexipack Sales Pvt. Ltd., his company's account was also used to transfer fund in the account of M/s Montage Sales Pvt. Ltd.

- On being asked he stated that his company has one bank account 1575020000000013 (Utkarsh Small Finance Bank, Vivek Vihar, Delhi-92) and submitted a copy of a/c statement;
- Shri Ratan Chand, Director of M/s Dealistix India Pvt. Ltd., informed that his company was tasked to collect debt from the following firms on behalf of M/s MFSPL, Lucknow;

0	Kritika Trading Company	24,37,89,914/-
0	Dev Warapers	7,54,24,387/-
0	KC Laminate	5,61,39,309/-
0	Khalid Traders	13,08,19,826/-
0	Vijay Sales	10,72,81,612/-
0	Vikram Sales	8,37,00,000/-



• On being confronted that as per Bank Account statement of *M/s Dealistix India Pvt. Ltd. (157502000000013), none of these firms/companies have ever or actually paid any amount rather the payment was credited from some unrelated parties, which was subsequently transferred to account of M/s MFSPL, Shri Ratan Chand divulged that he did the same on behest of CA Shri Gaurav Goyal*

And whereas, the tax invoices issued by M/s Dealistix India Pvt. Ltd., to M/s MFPSL, Lucknow and M/s MSPL, Delhi for "Professional Charges for Debt Recovery", and bank a/c statement of M/s Dealistix India Pvt. Ltd. (157502000000013) are analyzed and it has been revealed that M/s Dealistix India Pvt. Ltd., had issued invoices and shown recovery from aforesaid firms whereas no payment was credit in their bank account from these firms (**Collectively RUD-419B**).

Tax Invoice details	Issued to	Shown Debt recovered from	Debt Recovered
DIPL/2021-22/02 dated 11.06.2021	M/s MSPL, Delhi	M/s K C Laminates	12,30,80,848
DIPL/2021-22/03 dated 11.06.2021	M/s MSPL, Delhi	M/s Ajay Trading Co	12,86,81,400
DIPL/2021-22/05 dated 22.06.2021	M/s MFSPL, Delhi	M/s Kritika Trading Co	24,37,84,914
DIPL/2021-22/06 dated 25.06.2021	M/s MFSPL, Delhi	M/s K C Laminates	5,61,39,309
DIPL/2021-22/07 dated 24.07.2021	M/s MFSPL, Delhi	M/s Dev Warapers	7,54,24,387
DIPL/2021-22/08 dated 28.07.2021	M/s MFSPL, Delhi	M/s Vijay Sales	10,72,81,612
DIPL/2021-22/09 dated 29.07.2021	M/s MFSPL, Delhi	M/s Khalid Traders	13,08,19,826
DIPL/2021-22/10 dated 29.07.2021	M/s MFSPL, Delhi	M/s Vikram Sales	8,37,00,000

5.8.5 Whereas, on analysis of list of debtors of M/s MEPL and its depots **(RUD-420)** it has been noticed the complete payment was yet not collected from the bogus firms/companies against the supplies shown by M/s MEPL and its depots. For illustration, a list of firms which were found bogus (non-existent/non-operational) is placed in below table, to whom M/s MSPL, Delhi had shown supply as per their GSTR-1M returns, the value of supply is detailed in column (3) and the amount yet to be collected is detailed in column (2), from the same it is clearly evident that the major amount in respect of the following firms is still to be recovered.

Trade Name	Amount yet to be collected as per Debtor List dated 31.03.2023	Value of Supply shown by M/s MSPL, Delhi
(1)	(2)	(3)
H K Enterprises	30,19,85,738	30,19,85,738



Niraj Enterprises	26,62,31,322	26,62,31,322
BSA Industries	22,47,60,675	22,47,60,675
Surya Enterprises	21,03,68,020	21,03,68,020
Khalid Traders	20,06,35,112	21,13,01,702
Jyoti Traders	13,31,34,093	27,11,51,479
Arranger Tradelinks (India) P. Ltd.	11,72,97,365	17,56,49,182
Jay Trading Co.	9,98,49,002	9,98,49,002
Gupta Enterprises	9,75,83,482	9,75,83,482
Barfani Traders	9,66,89,829	9,66,89,829
Surya Enterprises	9,46,80,030	9,56,85,715
Salasar Enterprises	9,41,27,999	9,65,10,568
Winjet Industries	9,10,74,080	9,86,30,110
Hari Sales Corporation	9,07,93,552	9,55,70,888
Swastik Enterprises	8,95,58,991	8,95,58,991
Ganpati Enterprises	8,83,62,572	9,50,22,555
Singh International	8,57,42,829	9,28,07,256
Sunil S Traders	8,38,90,020	8,38,90,020
Convergent Alliance	8,08,09,960	8,21,98,407
Gita Enterprises	7,82,61,538	7,82,61,538
Yadav Enterprises	7,63,75,568	7,63,75,568
Kumar Enterprises	8,58,11,816	8,58,11,816
Kumar Enterprises	7,41,26,522	7,41,26,522
Raghav Traders	7,34,11,529	7,34,11,529
Tyagi Traders	7,33,72,378	7,33,72,378
Aakar Trading Syndicate	7,19,17,903	7,19,17,903
Aavesh Enterprises	7,13,82,244	7,81,18,780
Tiwari Trading Company	7,00,48,579	15,73,26,778
Swastik Enterprises	6,97,47,819	7,02,30,624
Gee Kay Sales	6,82,30,099	6,82,30,099
Surya Enterprises	5,90,14,731	5,90,14,731
Galaxy Impex	5,74,70,759	5,74,70,759
Starnx Enterprises	5,74,22,116	7,02,85,317
Singh Enterprises	5,73,29,417	13,47,01,182
J P Enterprises	5,66,48,039	5,66,48,039
Choudhari Traders	5,43,75,104	5,43,75,104
Avi Foil Traders	5,19,33,480	5,28,51,748
Singh Traders	5,16,43,449	5,16,43,449
Esprit Enterprises	4,87,71,801	21,70,42,323
Mahaveer Industries	4,72,59,596	4,80,71,522
Dinesh Enterprises	4,58,16,760	4,58,16,760
Ashoka Industry	4,47,09,483	4,47,09,483
Shiv Sales	4,35,90,191	4,35,90,191
Renu Enterprises	4,02,14,203	4,30,16,861
Kavita Industries	3,63,00,780	18,01,17,993
Neelima Enterprises	2,87,02,356	2,87,02,356
Gupta Traders	2,80,06,172	2,80,06,172
D.K. Enterprises	2,42,90,670	3,76,54,639



Vikas Traders	2,30,42,874	3,05,16,216
Kumar Traders	2,29,40,481	3,11,42,744
Durga Enterprises	2,28,35,151	2,70,11,924
Lalit Enterprises	1,85,68,137	7,69,96,055
Concept	1,53,75,925	13,19,91,063
Unique Traders	1,45,68,668	5,62,87,095
Vishnu Traders	1,17,89,212	15,10,13,142
Shri Bala Ji Traders	1,02,25,439	1,02,36,441
ST Traders	95,24,083	15,00,74,006
Ragni Enterprises	92,87,887	8,44,47,198
Universal Traders	86,52,452	13,56,93,451
Singh Enterprises	77,77,803	5,73,29,417
Gupta Enterprises	66,87,499	6,34,80,211
Jai Bhawani Traders	65,36,195	3,77,04,278
Seaborne Creations	57,44,646	9,45,18,813
Soham Marketing	51,54,492	8,46,69,825
A M Enterprises	49,76,192	8,27,60,231
Phonix Traders	38,59,170	41,36,40,563
Image India	37,09,099	2,31,50,217
Yadav Plastic	32,22,433	7,63,02,832
Aggarwal Traders	31,28,494	7,52,15,855
Shree Jee Traders	29,39,913	21,26,93,486
Jajoria Enterprise	14,70,000	8,09,10,646
Total	4,41,57,76,018	7,13,41,32,814

Similarly, a list of firms which were found bogus (non-existent/non-operational) is placed in below table, to whom M/s MPSPL, Gwalior had shown supply as per their GSTR-1M returns, the value of supply is detailed in column (3) and the amount yet to be collected is in detailed in column (2), from the same it is clearly evident that the major amount in respect of the following firms is still to be recovered.

Trade Name	Amount yet to be collected as per Debtor List dated 31.03.2023	Value of Supply shown by M/s MPSPL, Gwalior
(1)	(2)	(3)
Ajay Trading Co	19,38,294	19,38,294
Dilip Enterprises	5,15,09,800	44,03,16,607
HR Enterprise	3,35,28,621	11,36,60,452
Aakar Trading Syndicate	3,98,19,063	3,98,19,063
Mask Enterprise	2,76,49,780	2,76,49,780
Total	15,44,45,558	62,33,84,195

And whereas, from the aforesaid discussions, it appears that the amount representing as tax was not completely collected from the bogus firms. Further, even though the tax was not collected in respect of tax invoices issued by M/s MEPL and its depots, they continuously shown supply of goods to these bogus firms.



5.8.6 Whereas, from the aforesaid discussions, it appears that the payment credited in the bank accounts of M/s MEPL and its depots from the bogus firms was initially provided by M/s MEPL in cash (received from Pan Masala/Chewing Tobacco Manufacturer) to middle persons (Dipanshu Gupta, Shekhar Gupta)/Angadias and thereafter the fund was routed through the bank accounts of bogus firms finally credited in the bank accounts of M/s MEPL and its depots. Hence, it appears that M/s MEPL and its depots had only issued tax invoices to these bogus firms/companies without supply of underlying goods.

5.9 INVESTIGATION IN RELATION TO TRANSPORTATION:

5.9.1 Whereas, the Premises of the transporters identified from the e-way bills analysis were searched, however, except from the residential premise of Shri Sujeet Kumar Singh, owner of M/s Bharat Transport Company Pvt. Ltd., nothing relevant to the investigation could be unearthed.

And whereas, during the search at the residential premises of Shri Sujeet Kumar Singh, owner of M/s BTCPL, Noida on 25.06.2021, a file was unearthed and resumed under the INS-02 of the Panchnama dated 25.06.2021 {@ Sl. No. 17 (**RUD-15**)}, which contained the details of laminate (Packaging Material) transported on the vehicles owned by M/s BTCPL, Noida. The details of transportation contained in the said file were maintained date-wise for the period December 2020 to June 2021 (upto 8th June). Further, it is pertinent to mention that in the tax invoice issued by M/s MSPL, Delhi the vehicle nos. mentioned were owned by M/s BTCPL, Noida and transporter were shown as M/s Raj Kumar Transports, M/s Paras Transport Co., M/s Radha Krishna Freight Carrier etc. (all were found non-existent at their registered address during the physical verification). Detailed analysis of record resumed from the residential premises of Shri Sujeet Kumar Singh is discussed in para 3 of this notice.

And whereas, summons were also issued to these transporters but no reply has been received. Further, summons were also issued to the drivers listed in the file resumed under the INS-02 of the Panchnama dated 25.06.2021 (@ Sl. No. 17), but no one appeared before the investigation.

5.9.2 Whereas, a statement of Shri Sujeet Kumar Singh, owner of M/s BTCPL was recorded on 25.06.2021 **(RUD-16)**. The English version of the relevant portion of the statement is produced hereunder,

- *he and his family members were directors in various companies which were engaged in different businesses.*
- On being asked he stated that he and his brother Shri Abhijeet Singh were directors of M/s BTCPL, Noida till 2018 but thereafter 2018 Shri Keshav Chandra Patra and Shri Madan Mohan Jena are the directors, but due to non-payment of dues they again take the supervision of M/s BTCPL within six months, and that



though Shri Keshav Chandra Patra and Shri Madan Mohan Jena are still the directors but the company is run and managed by him with full control.

- On being asked he stated that M/s BTCPL, is in the business of goods transportation and owns around 125 trucks. he is transporting goods i.e., printed laminates from M/s Montage Enterprises Pvt. Ltd., Noida, & M/s Montage Sales Pvt. Ltd., Delhi. The printed laminates are used for packaging of Pan Masala, Tobacco, and food items etc.
- On being asked he stated that he has been transporting printed laminates for M/s MEPL, Noida since 2012 and for M/s MSPL, Delhi since October, 2019. He also stated that he does not have any written agreement with both the said companies for transportation and receives freight charges from M/s MEPL, Noida through cheques whereas in respect of M/s MSPL, Delhi he collects the same from consignee/customers.
- On being asked he elaborates the entries written on pages number 1 to 5 of the said file as the same is having details of transportation made between 01.12.2020 to 19.12.2020, and the details contain the truck number, the brand name of goods, number of boxes, quantity, destination, and expenses. He further explains the details of the entry dated 01.12.2020 as under,

Date	Vehicle	Driver Name	Material	Box	Weight	Destination	Expenses
01.12.2020	2993	Gyan Singh	Kclssic PM 1.50/-, NPCCgold C/T1/, SikharPM17/-, SNKPM18/-, GaganSPM1.50/-	653	22055.64	Kanpur	40,000

Truck number 2993 transported goods i.e., laminate of Kclssic Pan Masala of MRP Rs.1.50/-, NPCCgold CT of MRP Rs.1/, Sikhar Pan Masala of MRP Rs. 17/-, SNK Pan Masala of MRP Rs.18/-, and Gagan Strong Pan Masala of MRP Rs.1.50/-, contained in 653 bags having total weight 22055.64 Kg on 01.12.2020 and destination was Kanpur. In a similar way, all other entries contained the date, truck number, and description of laminate i.e., brand name of the Pan Masala/Tobacco to which the said goods belong.

Further, he also stated that the details of these consignments can be matched with the invoices issued by M/s Montage Enterprises Pvt. Ltd., or M/s Montage Sales Pvt. Ltd., Delhi on the same date.

5.9.3 Whereas, from the discussions made in para 3 and statements of various persons, it appears that the goods shown to supplied to bogus (non-existent/non-operational) firms/companies were clandestinely supplied to various Pan Masala/Tobacco manufacturing unit.



6. The following documents/records/Statements revealed that M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior were the depots/Extension of M/s MEPL and Controlled & Managed by M/s MEPL:

6.1 Goods Sale and Purchase Agreement executed between M/s MEPL with M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior (Collectively RUD-421): M/s Montage Enterprises Pvt. Ltd. had entered into agreement with M/s Montage Sales Pvt. Ltd., Delhi, M/s Montage Flexipack Sales Pvt. Ltd., Lucknow, M/s Montage Printpack Sales Pvt. Ltd., Gwalior, and others for sale/purchase of flexible packaging material and other allied products manufactured by M/s MEPL. Agreements entered between M/s MEPL with M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior are similar in all aspect only difference is name of the company. From the analysis of the said agreements following points emerged.

Here buyer means M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior and seller means M/s MEPL (all manufacturing units).

- The use of word "Montage" in the Company name of the Buyer is being allowed by the Seller on a condition that the Buyer **will exclusively purchase the products from the Seller** and **in no circumstances, it will purchase any goods or material for its business from any third party** other than Seller.
- The Seller shall have exclusive right to decide about the existence of breach of condition and the decision of Seller shall be final, in this regard. The Buyer shall have no right to dispute the decision of the Seller.
- The Buyer shall make the **payment to the Seller within a period of 90-120 days**. The **Seller may give relaxation of Payment** upon such terms and conditions as may mutually decided between the parties.
- The Seller understand that **Buyer may from time to time** (in Buyer's sole discretion) advertise and or otherwise market the product supplied by the Seller to Buyer either online or by advertisement in any mode of communication. However, the Seller shall not be liable in any manner for any such material being displayed either online or in any mode of communication and the **Buyer will be solely responsible** for such marketing and advertisement. The Buyer shall be solely responsible for such marketing and advertisement. The Buyer shall market or advertise the products on its own cost and risk and the Seller will not be responsible and bear any cost or risk.
- All the marketing expenses including any kind of expenses incurred in selling, marketing, advertising, and publicity of the goods/products by the Buyer shall exclusively be borne by the Buyer itself.



And whereas, from the analysis of Goods Sale and Purchase Agreement executed between M/s MEPL with M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior, it appears that,

- ➢ M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior only purchased goods manufactured by group companies of M/s MEPL and never purchased goods from any other manufacturer.
- M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior mainly engaged in marketing of goods manufactured by M/s MEPL and for that M/s MEPL did not pay any extra amount to these companies. Further, it pertinent to mention that after induction of these companies, M/s MEPL completely abolished the marketing section of M/s MEPL, because those persons working as Marketing Persons with M/s MEPL became directors of these companies or employee of these companies. Factually, they all were working as Marketing Persons of M/s MEPL but getting salary from these companies.
- The payment term is very relaxant i.e., 90-120 days and may further be relaxed. This shows that M/s MEPL is not having any concern about the payment and even when payment was not received, they continuously supplied goods to these depots. Further, from the investigation carried out it appears that because payment was already received in cash from Pan Masala/Chewing Tobacco units and through various angadias the said cash was routed through various bogus firms to the account of these companies. That is why M/s MEPL had made a very relaxant payment terms with these companies so that the cash received by M/s MEPL is routed through the banking channel and that may take time.
- M/s MEPL had right to inspect the business premise, stocks and financial of these companies.

6.2 Whereas, it is relevant to point out the fact that Mr. H.S. Matharu & Mr. Jasmeet Singh, Directors of M/s MSPL, Delhi, Mr. Sandeep Jain & Mr. Nikhil Agnihotri Directors of M/s MFSPL, Lucknow, and Mr. Sushil Singh & Mr. Gagandip Singh Bawa Directors of M/s MPSPL, Gwalior were working as marketing managers in M/s MEPL for more than 10-15 years, before they purportedly started a new company on the advice of Shri Arvind Gupta, Promoter Director of M/s MEPL bearing name of "Montage".

And whereas, they all in their respective statement had admitted that they were doing the same work i.e., marketing of goods manufactured by M/s MEPL and managing old customer even after they were inducted as directors, the only difference is that they were getting salary from their respective companies in place of M/s MEPL. They also admitted that there was not any change in their salary structure either when they were working with M/s MEPL or as Directors of their respective companies.

6.3 Whereas, Mr. H.S. Matharu & Mr. Jasmeet Singh, Directors of M/s MSPL, Delhi, Mr. Sandeep Jain & Mr. Nikhil Agnihotri Directors of M/s MFSPL, Lucknow in their statements unequivocally admitted that on the advice of Shri Arvind Gupta, Promoter



Director of M/s MEPL, they had started their respective company with the initial capital of Rs. 1 Lakh only which was provided by M/s MEPL. The name of their respective companies was started with the word Montage, and they were only allowed to purchase goods from the manufacturing units of M/s MEPL.

6.4 Whereas, it is fact that after initiation of investigation against M/s MEPL and its depots, they all were resigned from their respective companies and again joined M/s MEPL at the same position from where they left M/s MEPL and were purportedly inducted as directors.

6.5 Whereas, on analysis of IP address by which GST returns of M/s MEPL, Noida, M/s MSPL, Delhi, M/s MFSPL, Lucknow and M/s MPSPL, Gwalior were filed it has been noticed that the returns of all the aforesaid companies were filed from the same IP address. For illustration, IP address used for filing various GST returns by the aforesaid companies during the period January to March 2021 is detailed hereunder,

Registration ID	IP Address	Activity Date	Activity
(Temp ID/GSTIN)	Used	& Time	Туре
09AACCM8173H1Z6		11-Jan-2021 &	Form GSTR -
MEPL, Noida	103.80.66.253	06:50:53 PM	01 Filed
09AACCM8173H1Z6	103.80.66.252	20-Jan-2021 &	Form GSTR-
MEPL, Noida	103.80.00.252	06:14:37 PM	3B Filed
09AACCM8173H1Z6	100 177 10 100	11-Feb-2021 &	Form GSTR -
MEPL, Noida	122.177.10.192	06:44:42 PM	01 Filed
09AACCM8173H1Z6	49.36.175.130	11-Mar-2021 &	Form GSTR -
MEPL, Noida	49.30.1/5.130	12:02:32 AM	01 Filed
09AACCM8173H1Z6	163.47.140.123	20-Mar-2021 &	Form GSTR-
MEPL, Noida	103.4/.140.123	04:15:51 PM	3B Filed
09AACCM8173H1Z6	103.80.66.253	31-Mar-2021 &	Form GSTR -
MEPL, Noida	103.00.00.253	03:58:36 PM	09 Filed
09AACCM8173H1Z6	103.80.66.253	31-Mar-2021 &	Form GSTR
MEPL, Noida	103.80.00.253	07:07:29 PM	-9C Filed
09AAMCM9015A1ZJ	163.47.140.123	11-Jan-2021 &	Form GSTR -
MFSPL, Lucknow	103.4/.140.123	06:27:03 PM	01 Filed
09AAMCM9015A1ZJ	103.80.66.252	20-Jan-2021 &	Form GSTR-
MFSPL, Lucknow	105.00.00.252	03:55:06 PM	3B Filed
09AAMCM9015A1ZJ	163.47.140.123	11-Feb-2021 &	Form GSTR -
MFSPL, Lucknow	103.4/.140.123	01:40:56 PM	01 Filed
09AAMCM9015A1ZJ	103.80.66.252	26-Feb-2021 &	Form GSTR -
MFSPL, Lucknow	105.00.00.252	04:20:59 PM	09 Filed
09AAMCM9015A1ZJ	103.80.66.252	27-Feb-2021 &	Form GSTR
MFSPL, Lucknow	103.00.00.232	06:05:30 PM	-9C Filed
09AAMCM9015A1ZJ	163.47.140.123	10-Mar-2021 &	Form GSTR -
MFSPL, Lucknow	103.4/.140.123	07:26:54 PM	01 Filed
09AAMCM9015A1ZJ	103.80.66.252	19-Mar-2021 &	Form GSTR-
MFSPL, Lucknow	103.00.00.252	01:59:32 PM	3B Filed
07AAMCM9016D1ZG	103.80.66.252	19-Feb-2021 &	Form GSTR-
MSPL, Delhi	103.00.00.252	04:02:48 PM	3B Filed



07AAMCM9016D1ZG		19-Feb-2021 &	Form GSTR-
MSPL, Delhi	103.80.66.252	04:02:48 PM	3B Filed
07AAMCM9016D1ZG	103.80.66.252	27-Feb-2021 &	Form GSTR
MSPL, Delhi	103.80.00.252	06:19:29 PM	-9C Filed
07AAMCM9016D1ZG	160 47 140 100	10-Mar-2021 &	Form GSTR -
MSPL, Delhi	163.47.140.123	07:06:23 PM	01 Filed
07AAMCM9016D1ZG	103.80.66.252	19-Mar-2021 &	Form GSTR-
MSPL, Delhi		02:19:04 PM	3B Filed
23AAMCM9078M1ZP	100 80 66 050	20-Feb-2021 &	Form GSTR-
MPSPL, Gwalior	103.80.66.252	04:05:14 PM	3B Filed
23AAMCM9078M1ZP		26-Feb-2021 &	Form GSTR -
MPSPL, Gwalior	103.80.66.252	02:03:35 PM	09 Filed
23AAMCM9078M1ZP	103.80.66.252	27-Feb-2021 &	Form GSTR
MPSPL, Gwalior	103.80.00.252	06:27:19 PM	-9C Filed
23AAMCM9078M1ZP	100 80 66 050	10-Mar-2021 &	Form GSTR -
MPSPL, Gwalior	103.80.66.252	04:29:31 PM	01 Filed
23AAMCM9078M1ZP	103.80.66.252	19-Mar-2021 &	Form GSTR-
MPSPL, Gwalior	103.00.00.252	01:30:04 PM	3B Filed

And whereas, from the aforesaid discussion, it appears that all the GST returns of M/s MSPL, Delhi, M/s MFSPL, Lucknow and M/s MPSPL, Gwalior were filed from the registered premise of M/s MEPL, Noida. It also appears that all the financial related activities of the aforesaid four companies were carried out from the corporate office of M/s MEPL, Noida because GSTR-9C returns (Annual GST Reconciliation Statement) of all these companies were filed from common IP address i.e., 103.80.66.252 on 27.03.2021 & 31.03.2021.

6.6 Whereas, from the aforesaid discussion, it appears that M/s MSPL, Delhi, M/s MFSPL, Lucknow and M/s MPSPL, Gwalior are not separate entities, and they all were created, operated, controlled, and managed by M/s MEPL. In other words, these companies are fully controlled extensions/depots of M/s MEPL.

7. INVESTIGATIONS CARRIED OUT AGAINST PAN MASALA/CHEWING TOBACCO MANUFACTURER:

7.1 Whereas, on the basis of documents resumed under the INS-02 of the Panchnama dated 25.06.2021 (@ Sl.No. 17), which contained the details of laminate (Packaging Material) transported on the vehicles owned by M/s BTCPL, Noida to the manufacturing unit of Pan Masala/Chewing Tobacco, investigation against three (03) Pan masala/chewing tobacco manufacturing units namely M/s A J Sugandhi Pvt. Ltd., Kanpur (manufacturer of SNK & Gagan brand Pan Masala/Chewing Tobacco), M/s K. G. Pan Products Pvt. Ltd., & M/s Wast Industries, Gorakhpur (manufacturer of Suddh Plus, Panchmukhi & Raunk brand Pan Masala/Chewing Tobacco), and M/s Kay Pan Fragrance Pvt. Ltd., & M/s K.Y. Tobacco Pvt. Ltd, Ghaziabad (manufacturer of Rajshree & Kamla Pasand brand Pan Masala/Chewing Tobacco) was initiated.



7.2 Whereas, during the investigation against manufacturing unit of Pan Masala/Chewing Tobacco, statements of various persons were recorded wherein they admitted that they were receiving supplies of Printed laminate from group companies of Montage.

7.2.1 And whereas, Shri Neeraj Jain, key person of M/s Kay Pan Fragrance Pvt. Ltd., & M/s K.Y. Tobacco Pvt. Ltd, Ghaziabad, was shown Panchnama dated 25.06.2021 drawn at the residential premises of Shri Sujeet Kumar Singh, file @sl. no. 17 resumed under Panchnama dated 25.06.2021 and statement dated 25.06.2021 of Shri Sujeet Kumar Singh. Further it was informed that Shri Sujeet Kumar Singh in his statement dated 25.06.2021 had admitted that he had transported unaccounted printed laminate to various pan masala/ Tobacco units supplied by M/s MSPL, Delhi. Shri Neeraj Jain in his agreement signed the statement of Shri Sujeet Kumar Singh, Panchnama dated 25.06.2021 and on the pages of file @sl.no.17, which reflected entries relating to Kamla Pasand & Rajshree brand Pan Masala/Tobacco manufactured at Ghaziabad. Further, he stated that they had received unaccounted printed laminate of Kamla Pasand and Rajshree Brand from M/s MSPL, Delhi.

7.2.2 And whereas, Shri Amar Tulsiyan, Director of M/s K. G. Pan Products Pvt. Ltd., agreed that they had procured unaccounted printed laminate from M/s Montage Sales Private Limited, Delhi through M/s Bharat Transport Company. He also stated that during the said procurement period no invoice was issued to their factories by M/s Montage Sales Private Limited, Delhi.

7.2.3 And whereas, Shri Pradeep Kumar Rungta, Director of M/s K. G. Pan Products Pvt. Ltd., & Proprietor of M/s Wast Industries, Gorakhpur in his statement dated 28.09.2021 agreed with the statement dated 25.06.2021 of Shri Sujeet Kumar Singh, owner of M/s BTCPL, Noida and admitted that the entries relating to Sudhplus, Punchmukhi & Raunak and destination Gorakhpur in file no. 17, without issuance of invoices pertained to both M/s KGPPL, Gorakhpur and M/s Wast, Gorakhpur.

7.2.4 And whereas, Shri Avinash Modi, Director of M/s A J Sugandhi Pvt. Ltd., Kanpur was shown Panchnama dated 25.06.2021 drawn at the residential premises of Shri Sujeet Kumar Singh, file @sl. no. 17 resumed under Panchnama dated 25.06.2021 and statement dated 25.06.2021 of Shri Sujeet Kumar Singh, wherein Shri Sujeet Kumar had admitted transporting printed laminate of various Pan Masala manufacturers supplied by M/s MSPL, Delhi. Shri Avinash Modi was also informed that the File no. 17 contained the details of printed laminates transported by M/s BTCPL to M/s A J Sugandhi Pvt. Ltd. Shri Avinash Modi after going through the file no. 17, put his dated signature in token of his agreement. Further, he unequivocally admitted that the unaccounted laminates which had been received by them from M/s MSPL, Delhi were used in clandestine production & supply of Pan Masala.

7.3 Whereas, confirmatory statement of aforesaid persons and recovery of incriminating records/unaccounted finished goods from various premises of the



aforesaid manufacturers of Pan Masala/Chewing Tobacco confirmed that the unaccounted purchase of printed laminate were made by these manufacturers from by M/s MSPL/MEPL and further used for manufacturing and clandestine supply of finished goods i.e., Pan Masala/Chewing Tobacco. Accordingly, demand have been raised against these manufacturers.

7.4 Whereas, after initiating the investigation against the above three companies it was confirmed that the records recovered from the premise of the transporter were correct, and hence after due approval, the details regarding the clandestine supply of laminate to various Pan Masala/Tobacco were forwarded to the concerned DGGI, Zonal Units where those manufacturing units were located. Based on the information provided by this office various DGGI, Zonal Units have also booked cases of clandestine clearances of Pan Masala/Tobacco. The DGGI, Gurugram Zonal Unit booked cases against 11 firms/companies and have made detection amounting to **₹191.44 Crore** and recovery of **₹100.80 Crore**.

8. INVESTIGATIONS CARRIED OUT AGAINST THE END BENEFICIARY OF FAKE ITC PASSED ON BY THE BOGUS FIRMS:

Whereas, the GSTR 1M of bogus firms/companies had been downloaded from the portal and consolidated. It has been found that these bogus firms/companies had issued invoices to more than 1400 firms/companies and passed on ineligible ITC without supply of goods. Accordingly, the list of L1 firms were shared with the jurisdictional Commissionerate for taking necessary action against the same to safeguard Government Revenue. Some of the recipients were taken up by DGGI, Meerut Zonal Unit to initiate action to recover the fraudulently availed Input Tax Credit. The outcome of the investigation conducted against the recipients conclusively established that these recipients never received any supply of the goods mentioned in the tax invoices received from the fake suppliers against which they took the input tax credit of GST. The details of investigation conducted against some of the recipients is briefly discussed hereunder,

8.1 M/s 3RD Rock Multimedia Limited: The taxpayer had availed fake ITC amounting to **₹10.28 Crore**, and had voluntarily reversed the ITC amounting to **₹5.22** Crore. SCN No.GST/44/JC/CGST-MW/3rdRock/23-24 dated 06.02.2024, was issued under the provisions of Section 74(1) of the CGST Act (RUD-422).

8.2 M/s Aquawhite Retail India Pvt. Ltd.: M/s Naresh Sales had issued invoices to M/s Aquawhite Retail India Pvt. Ltd. Enquiry was initiated but no reply was received from M/s Aquawhite Retail India Pvt. Ltd. Hence, SCN was issued under the provisions of Section 74(1) of the CGST Act (**RUD-423**).

8.3 M/s Golf Enterprises (09GXPPS6485B1ZO): M/s BPSR Industries Pvt. Ltd., M/s Ghaziabad Enterprises Pvt. Ltd., M/s Gwalior Enterprises Pvt. Ltd., M/s M K Trading Co., M/s Mantova Enterprises Pvt. Ltd., M/s P.C. Supplier Co., M/s S V



Enterprises, and M/s Vinayak Traders (Firms to whom M/s MEPL and its depots had issued tax invoices) had issued invoices to M/s Golf Enterprises. Accordingly, investigation was initiated but during the physical verification the firm was found non-existent at the registered premise. Hence, SCN was issued under the provisions of Section 74(1) of the CGST Act, on 05.04.2022. However, neither payment was made nor any reply was submitted hence order was issued on 17.01.2023, for confirming demand of **₹17.18 Crore (RUD-424)**.

8.4 M/s SBC Exports Limited: The taxpayer had availed fake ITC amounting to **₹8.72 Crore**, and had voluntarily reversed the ITC amounting to **₹3.98 Crore**. The matter is under investigation.

8.5 M/s M K C Traders (o9BNLPCo777P1ZD): M/s MKC Traders had availed ITC passed on by firms to whom M/s MEPL and its depots had issued tax invoices. Accordingly, investigation was initiated but during the physical verification the firm was found non-existent at the registered premise. Hence, SCN was issued under the provisions of Section 74(1) of the CGST Act. However, neither payment was made nor any reply was submitted hence order was issued on 18.01.2022, for confirming demand of **₹1.07 Crore (RUD-425)**.

8.6 M/s Escort Limited: M/s Ripu Trading Company; M/s Rabindra Laminates; M/s Kavita Industries, and M/s Vikas Trading Company (Firms to whom M/s MEPL and its depots had issued tax invoices) had issued invoices to M/s Global Tiger India Pvt. Ltd. Shri Gaurav Garg, Authorized Signatory of M/s Global Tiger India Pvt. Ltd., stated that they had not received any supply along with invoices issued by aforementioned firms. Further, he stated that he availed the ITC passed on by these firms and had issued invoices to M/s Escort Limited (06AAACE0074B1ZE) for supply of the services "Digital and Offline Marketing, Brand Promotion and Management, however no service was supplied. M/s Escort Limited has accepted his liability and deposited ₹1.11 Crore (due tax along with interest and penalty).

8.7 M/s Ambay Trading Co: Shri Sushil Kumar Gupta, Proprietor of M/s Ambay Trading Company, make a statement with reference to M/s Suraj Enterprises (07HWVPS6195C1ZM), whose ITC amounting to **₹1.50 Crore** was appearing in 2A of March, 2019 of M/s Ambay Trading Company, that, *he does not know the said firm, and never ever dealt with the said firm at any time; he also submitted that they had not availed ITC w.r.t. invoices issued by M/s Suraj Enterprises (07HWVPS6195C1ZM), as reflected in GSTR-2A of his firms, and for this he had submitted bank statement, and reconciliation of GSTR-3B with GSTR-2A for the relevant period.*

9. STATUTORY PROVISIONS RELEVANT TO THE PRESENT INVESTIGATION:



The provisions of the CGST Act, 2017, and the SGST Act, 2017 are the same except for certain specific provisions. Therefore, unless a mention is specifically made to any dissimilar provisions, a reference to the CGST Act, 2017 would also mean a reference to the same provision under the SGST Act, 2017. Moreover, Section 20 of the IGST Act, 2017 had made the provisions of the CGST Act in relation to supply, registration, tax invoices, accounts, returns, demand & recovery etc. applicable to integrated tax as they apply in relation to central tax as if they are enacted under the IGST Act.

9.1 The following provisions of the CGST, Act 2017, and the rules made thereunder are relevant to the present investigation.

A. Section 2 of the Act ibid, defines 'assessment, 'input tax', 'input tax credit', 'inward supply', 'outward supply', 'supplier' and 'valid return' as under:

- Section 2 (11) defines "assessment" means determination of tax liability under this Act and includes self-assessment, re-assessment, provisional assessment, summary assessment and best judgment assessment;
- Section 2(62) defines "input tax" in relation to a registered person, means the central tax, State tax, integrated tax or Union territory tax charged on any supply of goods or services or both made to him and includes
 - (a) the integrated goods and services tax charged on import of goods;
 - (b) the tax payable under the provisions of sub-sections (3) and (4) of section 9;
 - (c) the tax payable under the provisions of sub-sections (3) and (4) of section 5 of the Integrated Goods and Services Tax Act;
 - (d) the tax payable under the provisions of sub-sections (3) and (4) of section 9 of the respective State Goods and Services Tax Act; or
 - (e) the tax payable under the provisions of sub-sections (3) and (4) of section 7 of the Union Territory Goods and Services Tax Act,
 - but does not include the tax paid under the composition levy;
- Section 2(63) defines "input tax credit" means the credit of input tax;
- Section 2(67) defines "inward supply" in relation to a person, shall mean receipt of goods or services or both, whether by purchase, acquisition or any other means with or without consideration;
- Section 2(83) defines "outward supply" in relation to a taxable person, means supply of goods or services or both, whether by sale, transfer, barter, exchange, license, rental, lease or disposal or any other mode, made or agreed to be made by such person in course of furtherance of business;
- Section 2(105) defines "Supplier" in relation to any goods or services or both shall mean the persons supplying the said goods or services or both and shall include an agent acting as such on behalf of such supplier in relation to the goods or services or both supplied;
- Section 2(117) defines "valid return" means a return furnished under sub-section (1) of section 39 on which self-assessed tax has been paid in full.

B. Section 6 – Authorisation of officers of State tax or Union territory tax as proper officer in certain circumstances



(1) Without prejudice to the provisions of this Act, the officers appointed under the State Goods and Services Tax Act or the Union Territory Goods and Services Tax Act are authorised to be the proper officers for the purposes of this Act, subject to such conditions as the Government shall, on the recommendations of the Council, by notification, specify.

(2) Subject to the conditions specified in the notification issued under sub-section (1),

- _
- (a) where any proper officer issues an order under this Act, he shall also issue an order under the State Goods and Services Tax Act or the Union Territory Goods and Services Tax Act, as authorised by the State Goods and Services Tax Act or the Union Territory Goods and Services Tax Act, as the case may be, under intimation to the jurisdictional officer of State tax or Union territory tax;
- (b) where a proper officer under the State Goods and Services Tax Act or the Union Territory Goods and Services Tax Act has initiated any proceedings on a subject matter, no proceedings shall be initiated by the proper officer under this Act on the same subject matter.

(3) Any proceedings for rectification, appeal and revision, wherever applicable, of any order passed by an officer appointed under this Act shall not lie before an officer appointed under the State Goods and Services Tax Act or the Union Territory Goods and Services Tax Act.

C. Section 7 – Scope of supply –

- (1) For the purposes of this Act, the expression "supply" includes –
- (a) all forms of supply of goods or services or both such as sale, transfer, barter, exchange, licence, rental, lease or disposal made or agreed to be made for a consideration by a person in the course or furtherance of business;

D. Section 16 – Eligibility and Conditions for taking Input Tax Credit –

(1) Every registered person shall, subject to such conditions and restrictions as may be prescribed and in the manner specified in section 49, be entitled to take credit of input tax charged on any supply of goods or services or both to him which are used or intended to be used in the course or furtherance of his business and the said amount shall be credited to the electronic credit ledger of such person.

(2) Notwithstanding anything contained in this section, no registered person shall be entitled to the credit of any input tax in respect of any supply of goods or services or both to him unless, –

- (a) he is in possession of a tax invoice or debit note issued by a supplier registered under this Act, or such other tax paying documents as may be prescribed;
- (aa) the details of the invoice or debit note referred to in clause (a) has been furnished by the supplier in the statement of outward supplies and such details have been communicated to the recipient of such invoice or debit note in the manner specified under section 37;
- (b) he has received the goods or services or both.

Explanation –For the purposes of this clause, it shall be deemed that the registered person has received the goods or, as the case may be, services –

 (i) where the goods are delivered by the supplier to a recipient or any other person on the direction of such registered person, whether acting as an agent or otherwise, before or during movement of goods, either by way of transfer of documents of title to goods or otherwise;



- (ii) where the services are provided by the supplier to any person on the direction of and on account of such registered person.]
- (c) subject to the provisions of section 41, the tax charged in respect of such supply has been actually paid to the Government, either in cash or through utilisation of input tax credit admissible in respect of the said supply; and
- (d) he has furnished the return under section 39:

Provided that where the goods against an invoice are received in lots or instalments, the registered person shall be entitled to take credit upon receipt of the last lot or instalment:

Provided further that where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the input tax credit availed by the recipient shall be added to his output tax liability, along with interest thereon, in such manner as may be prescribed:

Provided also that the recipient shall be entitled to avail of the credit of input tax on payment made by him of the amount towards the value of supply of goods or services or both along with tax payable thereon.

E. Section 31 – Tax invoice –

- (1) A registered person supplying taxable goods shall, before or at the time of, -
- (a) removal of goods for supply to the recipient, where the supply involves movement of goods; or
- (b) delivery of goods or making available thereof to the recipient, in any other case,

issue a tax invoice showing the description, quantity and value of goods, the tax charged thereon and such other particulars as may be prescribed,

Provided that the Government may, on the recommendations of the Council, by notification, specify the categories of goods or supplies in respect of which a tax invoice shall be issued, within such time and in such manner as may be prescribed.

F. Section 35 – Accounts and other records –

(1) Every registered person shall keep and maintain, at his principal place of business, as mentioned in the certificate of registration, a true and correct account of -(a) production or manufacture of goods; (b) inward and outward supply of goods or services or both; (c) stock of goods; (d) input tax credit availed; (e) output tax payable and paid; and (f) such other particulars as may be prescribed:

Provided that where more than one place of business is specified in the certificate of registration, the accounts relating to each place of business shall be kept at such places of business:

Provided further that the registered person may keep and maintain such accounts and other particulars in electronic form in such manner as may be prescribed.

(2) to 6

G. Section 37 – Furnishing details of outward supplies –

(1) Every registered person, other than an Input Service Distributor, a non-resident taxable person and a person paying tax under the provisions of section 10 or section 51 or section 52, shall furnish, electronically, in such form and manner as may be prescribed, the details of outward supplies of goods or services or both effected during a tax period on or before the tenth day of the month succeeding the said tax period and such details shall be



communicated to the recipient of the said supplies within such time and in such manner as may be prescribed:

Provided that the registered person shall not be allowed to furnish the details of outward supplies during the period from the eleventh day to the fifteenth day of the month succeeding the tax period:

Provided further that the Commissioner may, for reasons to be recorded in writing, by notification, extend the time limit for furnishing such details for such class of taxable persons as may be specified therein:

Provided also that any extension of time limit notified by the Commissioner of State tax or Commissioner of Union territory tax shall be deemed to be notified by the Commissioner

H. Section 39 – Furnishing of returns –

(1) Every registered person, other than an Input Service Distributor or a nonresident taxable person or a person paying tax under the provisions of section 10 or section 51 or section 52 shall, for every calendar month or part thereof, furnish, a return, electronically, of inward and outward supplies of goods or services or both, input tax credit availed, tax payable, tax paid and such other particulars, in such form and manner, and within such time, as may be prescribed:

Provided that the Government may, on the recommendations of the Council, notify certain class of registered persons who shall furnish a return for every quarter or part thereof, subject to such conditions and restrictions as may be specified therein.

I. Section 41 – Claim of input tax credit and provisional acceptance thereof –

(1) Every registered person shall, subject to such conditions and restrictions as may be prescribed, be entitled to take the credit of eligible input tax, as self-assessed, in his return and such amount shall be credited on a provisional basis to his electronic credit ledger.

(2) The credit referred to in sub-section (1) shall be utilised only for payment of selfassessed output tax as per the return referred to in the said sub-section.

J. Section 44 – Annual Return –

(1) Every registered person, other than an Input Service Distributor, a person paying tax under section 51 or section 52, a casual taxable person, and a non-resident taxable person, shall furnish an annual return for every financial year electronically in such form and manner as may be prescribed on or before the thirty-first day of December following the end of such financial year.

(2)

K. Section 49 – Payment of Tax, Interest, Penalty and other amounts –

(1) Every deposit made towards tax, interest, penalty, fee or any other amount by a person by internet banking or by using credit or debit cards or National Electronic Fund Transfer or Real Time Gross Settlement or by such other mode and subject to such conditions and restrictions as may be prescribed, shall be credited to the electronic cash ledger of such person to be maintained in such manner as may be prescribed.

(2) The input tax credit as self-assessed in the return of a registered person shall be credited to his electronic credit ledger, in accordance with section 41, to be maintained in such manner as may be prescribed.

(3) to (11)

L. Section 50 – Interest on delayed Payment of Tax –



(1) Every person who is liable to pay tax in accordance with the provisions of this Act or the rules made thereunder, but fails to pay the tax or any part thereof to the Government within the period prescribed, shall for the period for which the tax or any part thereof remains unpaid, pay, on his own, interest at such rate, not exceeding eighteen per cent., as may be notified by the Government on the recommendations of the Council:

Provided that the interest on tax payable in respect of supplies made during a tax period and declared in the return for the said period furnished after the due date in accordance with the provisions of section 39, except where such return is furnished after commencement of any proceedings under section 73 or section 74 in respect of the said period, shall be payable on that portion of the tax which is paid by debiting the electronic cash ledger.

(2) The interest under sub-section (1) shall be calculated, in such manner as may be prescribed, from the day succeeding the day on which such tax was due to be paid.

(3) Where the input tax credit has been wrongly availed and utilised, the registered person shall pay interest on such input tax credit wrongly availed and utilised, at such rate not exceeding twenty-four percent as may be notified by the Government, on the recommendations of the Council, and the interest shall be calculated, in such manner as may be prescribed.

M. Section 59 – Self-assessment –

Every registered person shall self-assess the taxes payable under this Act and furnish a return for each tax period as specified under section 39.

N. Section 74 – Determination of tax not paid or short paid or erroneously refunded or input tax credit wrongly availed or utilised by reason of fraud or any willful misstatement or suppression of facts –

(1) Where it appears to the proper officer that any tax has not been paid or short paid or erroneously refunded or where input tax credit has been wrongly availed or utilised by reason of fraud, or any wilful-misstatement or suppression of facts to evade tax, he shall serve notice on the person chargeable with tax which has not been so paid or which has been so short paid or to whom the refund has erroneously been made, or who has wrongly availed or utilised input tax credit, requiring him to show cause as to why he should not pay the amount specified in the notice along with interest payable thereon under section 50 and a penalty equivalent to the tax specified in the notice.

(2) The proper officer shall issue the notice under sub-section (1) at least six months prior to the time limit specified in sub-section (10) for issuance of order.

(3) Where a notice has been issued for any period under sub-section (1), the proper officer may serve a statement, containing the details of tax not paid or short paid or erroneously refunded or input tax credit wrongly availed or utilised for such periods other than those covered under sub-section (1), on the person chargeable with tax.

(4) The service of statement under sub-section (3) shall be deemed to be service of notice under sub-section (1) of section 73, subject to the condition that the grounds relied upon in the said statement, except the ground of fraud, or any wilful-misstatement or suppression of facts to evade tax, for periods other than those covered under sub-section (1) are the same as are mentioned in the earlier notice.

(5) The person chargeable with tax may, before service of notice under sub-section (1), pay the amount of tax along with interest payable under section 50 and a penalty equivalent to fifteen per cent. of such tax on the basis of his own ascertainment of such tax or the tax as ascertained by the proper officer and inform the proper officer in writing of such payment.



(6) The proper officer, on receipt of such information, shall not serve any notice under sub-section (1), in respect of the tax so paid or any penalty payable under the provisions of this Act or the rules made thereunder.

(7) Where the proper officer is of the opinion that the amount paid under sub-section (5) falls short of the amount actually payable, he shall proceed to issue the notice as provided for in sub-section (1) in respect of such amount which falls short of the amount actually payable.

(8) Where any person chargeable with tax under sub-section (1) pays the said tax along with interest payable under section 50 and a penalty equivalent to twenty-five per cent. of such tax within thirty days of issue of the notice, all proceedings in respect of the said notice shall be deemed to be concluded.

(9) The proper officer shall, after considering the representation, if any, made by the person chargeable with tax, determine the amount of tax, interest and penalty due from such person and issue an order.

(10) The proper officer shall issue the order under sub-section (9) within a period of five years from the due date for furnishing of annual return for the financial year to which the tax not paid or short paid or input tax credit wrongly availed or utilised relates to or within five years from the date of erroneous refund.

(11) Where any person served with an order issued under sub-section (9) pays the tax along with interest payable thereon under section 50 and a penalty equivalent to fifty percent. of such tax within thirty days of communication of the order, all proceedings in respect of the said notice shall be deemed to be concluded.

Explanation 1. – For the purposes of section 73 and this section, –

- (i) the expression all proceedings in respect of the said notice shall not include proceedings under section 132;
- (ii) where the notice under the same proceedings is issued to the main person liable to pay tax and some other persons, and such proceedings against the main person have been concluded under section 73 or section 74, the proceedings against all the persons liable to pay penalty under sections 122, and 125 are deemed to be concluded.

Explanation 2. – For the purposes of this Act, the expression "suppression" shall mean nondeclaration of facts or information which a taxable person is required to declare in the return, statement, report or any other document furnished under this Act or the rules made thereunder, or failure to furnish any information on being asked for, in writing, by the proper officer.

O. Section 122 – Penalty for certain offences –

(1) Where a taxable person who -

- *i.* supplies any goods or services or both without issue of any invoice or issues an incorrect or false invoice with regard to any such supply;
- ii. issues any invoice or bill without supply of goods or services or both in violation of the provisions of this Act or the rules made thereunder;
- vii. takes or utilises input tax credit without actual receipt of goods or services or both either fully or partially, in contravention of the provisions of this Act or the rules made thereunder;
- *x. falsifies or substitutes financial records or produces fake accounts or documents or furnishes any false information or return with an intention to evade payment of tax due under this Act;*
- xii. furnishes any false information with regard to registration particulars, either at the time of applying for registration, or subsequently;



- xiv. transports any taxable goods without the cover of documents as may be specified in this behalf;
- xvi. fails to keep, maintain or retain books of account and other documents in accordance with the provisions of this Act or the rules made thereunder;
- xvii. fails to furnish information or documents called for by an officer in accordance with the provisions of this Act or the rules made thereunder or furnishes false information or documents during any proceedings under this Act;
- xx. tampers with, or destroys any material evidence or document;

he shall be liable to pay a penalty of ten thousand rupees or an amount equivalent to the tax evaded or the tax not deducted under section 51 or short deducted or deducted but not paid to the Government or tax not collected under section 52 or short collected or collected but not paid to the Government or input tax credit availed of or passed on or distributed irregularly, or the refund claimed fraudulently, whichever is higher.

(1A) Any person who retains the benefit of a transaction covered under clauses (i), (ii), (vii) or clause (ix) of sub-section (1) and at whose instance such transaction is conducted, shall be liable to a penalty of an amount equivalent to the tax evaded or input tax credit availed of or passed on.

(2) Any registered person who supplies any goods or services or both on which any tax has not been paid or short-paid or erroneously refunded, or where the input tax credit has been wrongly availed or utilised, -

- (a) for any reason, other than the reason of fraud or any wilful misstatement or suppression of facts to evade tax, shall be liable to a penalty of ten thousand rupees or ten per cent. of the tax due from such person, whichever is higher;
- (b) for reason of fraud or any wilful misstatement or suppression of facts to evade tax, shall be liable to a penalty equal to ten thousand rupees or the tax due from such person, whichever is higher.
- (3) Any person who –
- (a) aids or abets any of the offences specified in clauses (i) to (xxi) of sub-section (1);
- (b) acquires possession of, or in any way concerns himself in transporting, removing, depositing, keeping, concealing, supplying, or purchasing or in any other manner deals with any goods which he knows or has reasons to believe are liable to confiscation under this Act or the rules made thereunder;
- (c) receives or is in any way concerned with the supply of, or in any other manner deals with any supply of services which he knows or has reasons to believe are in contravention of any provisions of this Act or the rules made thereunder;
- (d) fails to appear before the officer of central tax, when issued with a summon for appearance to give evidence or produce a document in an inquiry;
- (e) fails to issue invoice in accordance with the provisions of this Act or the rules made thereunder or fails to account for an invoice in his books of account,

shall be liable to a penalty which may extend to twenty-five thousand rupees.

P. Section 127 – Power to impose penalty in certain cases – Where the proper officer is of the view that a person is liable to a penalty and the same is not covered under any proceedings under section 62 or section 63 or section 64 or section 73 or section 74 or section 129 or section 130, he may issue an order levying such penalty after giving a reasonable opportunity of being heard to such person.

Q. Section 155 – Burden of proof –



Where any person claims that he is eligible for input tax credit under this Act, the burden of proving such claim shall lie on such person.

9.2 The following provision of the IGST Act, 2017 and the rules made thereunder are relevant to the present investigation.

A. Section 20 – Applicability of provisions of Central Goods and Services Tax Act – Subject to the provisions of this Act and the rules made thereunder, the provisions of Central Goods and Services Tax Act relating to, –

- (i) scope of supply;
- (ii) composite supply and mixed supply;
- (iii) time and value of supply;
- (iv) input tax credit;
- (v) registration;
- (vi) tax invoice, credit and debit notes;
- (vii) accounts and records;
- (viii) returns, other than late fee;
- (ix) payment of tax;
- (x) tax deduction at source;
- (xi) collection of tax at source;
- (xii) assessment;
- (xiii) refunds;
- (xiv) audit;
- (xv) inspection, search, seizure and arrest;
- (xvi) demands and recovery;
- (xvii) liability to pay in certain cases;
- (xviii) advance ruling;
- (xix) appeals and revision;
- (xx) presumption as to documents;
- (xxi) offences and penalties;
- (xxii) job work;
- (xxiii) electronic commerce;
- (xxiv) transitional provisions; and
- (xxv) miscellaneous provisions including the provisions relating to the imposition of interest and penalty,

shall, mutatis mutandis, apply, so far as may be, in relation to integrated tax as they apply in relation to central tax as if they are enacted under this Act:

9.3 The Notification No. 02/2022-CT dated 11.03.2022, the Central Government, makes the following amendments in the notification of the Government of India in the Ministry of Finance (Department of Revenue) No. 02/2017-Central Tax, dated the 19.06.2017,

In the said notification, -

(i) after paragraph 3, the following paragraph shall be inserted, namely: -

"3A. Notwithstanding anything contained in paragraph 3, the Additional Commissioners or the Joint Commissioners of Central Tax, as the case may be,



subordinate to the Principal Commissioners of Central Tax or the Commissioners of Central Tax, as specified in column (2) of Table V, are hereby vested with the powers as specified in the corresponding entry in Column (3) of the said Table."; (ii) after Table IV, the following Table shall be inserted, namely: -

"TABLE V

Powers of Additional Commissioner or Joint Commissioner of Central Tax for passing an order or decision in respect of notices issued by the officers of Directorate General of Goods and Services Tax Intelligence

Sl. No.	Principal Commissioner or Commissioner of Central Tax	Powers (Exercisable throughout the territory of India)		
(1)	(2)	(3)		
1.	Principal Commissioner Ahmedabad South			
2.	Principal Commissioner Bhopal	Description and an an Assistant in		
3.	Principal Commissioner Chandigarh	Passing an order or decision in		
4.	Commissioner Chennai South	respect of notices issued by the officers of Directorate General of		
5.	Principal Commissioner Delhi North	Goods and Services Tax Intelligence		
6.	Principal Commissioner Guwahati	under sections 67, 73, 74, 76, 122,		
7.	Commissioner Rangareddy	125, 127, 129 and 130 of Central		
8.	Principal Commissioner Kolkata North	Goods and Services Tax Act, 2017".		
9.	Principal Commissioner Lucknow			
10.	Commissioner Thane			

Further, in terms of Circular No.169/01/2022-GST dated 12.03.2022, the Additional/Joint Commissioners of Central Tax Commissionerate, Delhi North have been empowered with All India jurisdiction vide Notification No. 02/2022-Central Tax dated 11.03.2022 will be the adjudicating Authority in the present case.

9.4 CONTRAVENTION OF STATUTORY PROVISIONS:

Under the self-assessment procedure prescribed under the Act, it was the responsibility of the registered person to self-assessed and discharge their tax liability correctly and properly. From the discussion made in foregoing paras it appears that M/s MEPL, Jammu, Noida, Haridwar, Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior had issued tax invoices to various bogus (non-existent/non-operational) firms/companies and the goods (i.e., packaging materials) were clandestinely supplied to Pan Masala/Tobacco manufacturers located in various states. Hence, it appears that M/s MEPL, Jammu, Noida, Haridwar, Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior and the bogus (non-existent/non-operational) firms/companies discussed in para 4, have contravened the following provisions of the CGST Act, 2017 and the Rules made thereunder.



A. M/s MEPL, Jammu, Noida, Haridwar, Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow; and M/s MPSPL, Gwalior, have contravened the following provisions of the CGST Act, 2017 and the Rules made thereunder,

- i. Section 7 of the CGST Act, 2017, in as much as they clandestinely supplied packaging materials to various Pan Masala/Tobacco manufacturers.
- **ii.** The second proviso of Section 16(2), of the CGST Act, state that, where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the input tax credit availed by the recipient shall be paid by him along with interest payable under section 50.

Whereas, M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior failed to pay to the supplier of goods i.e., M/s MEPL, the amount towards the value of supply along with tax payable thereon within a period of 180 days from the date of issue of invoice, hence required to reverse the proportionate ITC availed against the value of supply along with tax payable, but not paid within 180 days. However, it is noticed that M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior failed to do so hence, the said amount is required to be recovered under the provisions of Section 74 of the Act, being wrong availment of ITC.

- iii. Section 31 of the CGST Act, 2017 in as much as they failed to issue correct invoices to the consignee to whom goods were actually supplied. M/s MEPL, Jammu, Noida, Haridwar, Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior had issued tax invoices to various bogus (non-existent/non-operational) firms/companies and the goods (i.e., packaging materials) were clandestinely supplied to Pan Masala/Tobacco manufacturers
- iv. Section 35 of the CGST Act, 2017 in as much as they failed to maintain a true and correct account of (a) production or manufacture of goods; (b) outward supply of goods; (c) stock of goods.
- v. Section 37, Section 39, and Section 49 of the CGST Act, 2017, in as much as failed to declare a true and correct value of outward supply made by them in the monthly GSTR-1M filed by them, and also failed to discharge correct GST liability in monthly GSTR-3B returns utilizing eligible Input Tax Credit or through cash ledger.
- *vi.* Section 44 of the CGST Act, 2017, in as much as they neither report nor amend the supply actually made by them in place of tax invoices issued to bogus (non-existent/non-operational) firms/companies in the annual return.
- vii. Section 59 of the CGST Act, 2017, in as much as they failed to self-assess the correct amount of taxes payable under this Act and furnish returns for each tax period as specified under Section 39 of CGST Act,2017

B. The bogus (non-existent/non-operational) firms/companies discussed in para 4, have contravened the following provisions of the CGST Act, 2017 and the Rules made thereunder,



- **i.** Section 16, of the CGST Act, 2017, in as much as they failed to fulfil the following conditions of Section 16(2),
 - (a) he is in possession of a tax invoice or debit note issued by a supplier registered under this Act;
 - (b) failed to receive underlying goods shown in the invoices;
 - (c) the supplier failed to furnish a valid return;

Further, they failed to pay to the supplier of goods, the amount towards the value of supply along with tax payable thereon within a period of 180 days from the date of issue of invoice by the supplier in most of the cases, even in some cases payment is still pending.

- *ii.* Section 31 of the CGST Act, 2017, in as much as they issued invoices without supply of underlying goods;
- *iii.* Section 35 of the CGST Act, 2017, in as much as they failed to maintain a true and correct account of (a) inward supply of goods; (b) Outward supply of goods (c) stock of goods;
- iv. Section 37, Section 39, and Section 49 of the CGST Act, 2017, in as much as they deliberately shown false value of outward supply without making genuine supply in the GSTR-1 returns, and availed irregular ITC on the strength of goods-less invoices issued by the bogus firms, and utilized the said irregular ITC in their GSTR-3B returns for making payment against the out falsely shown outward supply;
- **v.** Section 44 of the CGST Act, 2017, in as much as they neither report nor reversed the ITC availed based on bogus invoices in the annual return.

10. QUANTIFICATION:

10.1 Whereas, from the discussions made in foregoing paras, it appears that manufacturing unit of M/s MEPL and depots of M/s MEPL namely M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior were engaged in issuing tax invoices to various bogus (non-existent/non-operational) firms/companies and have clandestinely supplied to Pan Masala/Tobacco manufacturer units.

10.2 And whereas, during the investigation records of clandestine supply of goods to Pan Masala/Chewing Tobacco manufacturer for the period 01.12.2020 to 08.06.2021 was unearthed from the residential premises of Shri Sujeet Kumar Singh owner of M/s BTCPL, Noida. However, except the records unearthed from the residential premise of Shri Sujeet Kumar Singh no other documents were unearthed from which it could be ascertained that to which Pan Masala/Chewing Tobacco manufacturer, the were clandestinely supplied by M/s MEPL and its depots. However, on the basis of the following evidence it could be construed that M/s MEPL and its depots were indulged in clandestine supply of packaging material to Pan Masala/ Chewing Tobacco manufacturers.



- Statements of directors/production manager/ dispatch manager etc. of M/s MEPL & its depots recorded during investigation as discussed in para 5, they all had admitted that M/s MEPL is mainly engaged in manufacturing of packaging material for packaging of Pan Masala/Chewing Tobacco. However, as per GSTR-1M of M/s MEPL and its depots, almost negligible supply was shown to be made to Pan Masala/Chewing Tobacco manufacturers during the period under investigation, and invoices were used to various trading firms/companies, so it can be construed that the goods were clandestinely supplied to pan masala manufacturers. It is also evident from the documents recovered from the premise of Shri Sujeet Kumar Singh.
- On physical verification of firms/companies to whom invoices were issued by M/s MEPL & its depots they were either found non-existent or if existed at their registered business premise found non-operational.
- Statements of the director/partner/proprietor of the bogus firms/companies, wherein they unequivocally admitted that no goods were received/supplied by them, and firms/companies were created without their knowledge by forging their KYC documents.
- Statement of Shri Shekhar Gupta (cash handler), Shri Sujeet Kumar Singh (transporter), Shri Sarang Jhujhuwala and others wherein they all unequivocally admitted that the goods were supplied to the Pan Masala/Chewing Tobacco manufacturer, and the payment collected in cash from Pan Masala/Chewing Tobacco manufacturer was transferred to bogus firms/ companies through various Angadias. The payment so received by bogus firms/companies was finally credited to the bank accounts of M/s MEPL and its depots.

10.3 Whereas, on matching of the invoices issued to bogus firms/companies by M/s MSPL, Delhi with the entries of file @ Sl.No. 17 resumed under INS-02 of the Panchnama dated 25.06.2021 drawn at the residential premise of Shri Sujeet Kumar Singh, it is noticed that except GSTIN, Consignee Name & Place of supply all other information such as quantity/no. of boxes/invoice value/vehicle no./date etc., were matched. Further, Shri Sujeet Kumar Singh in their statement had unequivocally admitted that M/s MEPL and their depots through their transport company had clandestinely supplied packaging material to Pan Masala/Chewing Tobacco manufacturers and the tax invoices/ e-way bills issued to various bogus firms/companies.

10.4 Whereas, the GST liability on the clandestine supply of packaging materials made by M/s MEPL and its depots to Pan Masala/Chewing Tobacco manufacturers are quantified on the basis of tax invoices issued to bogus firms/companies by M/s MEPL and its depots. Hence, it appears that the amount of GST to be demanded and recovered



from M/s MEPL and its depots against the clandestine supply of goods to Pan Masala/Chewing Tobacco manufacturers is the said amount of GST that were shown on tax invoices issued to bogus firms by M/s MEPL and its depots. Accordingly, GST liability on the clandestine supply of packaging materials to Pan Masala/ Chewing Tobacco is quantified as under:

(A) M/s Montage Enterprises Pvt. Ltd., Jammu: As detailed in para 4.2 (A), as per GSTR-1M, M/s MEPL, Jammu had issued tax invoices to various bogus firms/companies involving GST amounting to ₹72.81 Crore, as detailed hereunder,

Financial	Tax Type				
Year	IGST CGST SGST				
2017-18	15,85,66,842	1,82,75,377	1,82,75,377		
2018-19	34,55,71,158	-	-		
2019-20	18,73,81,785	-	-		
Total	69,15,19,785	1,82,75,377	1,82,75,377		

(B) M/s Montage Enterprises Pvt. Ltd., Haridwar: As detailed in para 4.2 (B), as per GSTR-1M, M/s MEPL, Haridwar had issued tax invoices to various bogus firms/companies involving GST amounting to ₹232.04 Crore, as detailed hereunder,

Financial	Тах Туре					
Year	IGST CGST SGST					
2017-18	79,51,97,454	-	-			
2018-19	103,54,63,310	-	-			
2019-20	48,97,18,159	-	-			
Total	232,03,78,923	-	-			

(C) M/s Montage Enterprises Pvt. Ltd., Noida: As detailed in para 4.2 (C), as per GSTR-1M, M/s MEPL, Noida had issued tax invoices to various bogus firms/companies involving GST amounting to ₹128.72 Crore, as detailed hereunder,

Financial	Тах Туре		
Year	IGST	CGST	SGST
2017-18	13,74,72,084	10,33,50,982	10,33,50,982
2018-19	49,48,82,923	6,66,17,943	6,66,17,943
2019-20	30,97,86,558	25,50,787	25,50,787
Total	94,21,41,565	17,25,19,712	17,25,19,712

(D) M/s Montage Enterprises Pvt. Ltd., Malanpur: As detailed in para 4.2 (D), as per GSTR-1M, M/s MEPL, Malanpur had issued tax invoices to various bogus firms/companies involving GST amounting to ₹123.93 Crore, as detailed hereunder,



F.No. DGGI/INV/GST/1757/2021/GRU

Financial Year	IGST	CGST	SGST
2017-18	32,28,60,869	4,77,59,368	4,77,59,368
2018-19	40,86,59,615	6,26,90,185	6,26,90,185
2019-20	26,60,47,255	1,04,02,345	1,04,02,345
Total	99,75,67,739	12,08,51,897	12,08,51,897

(E) M/s Montage Sales Pvt. Ltd., Delhi: As detailed in para 4.2 (E), as per GSTR-1M, M/s MSPL, Delhi had issued tax invoices to various bogus firms/companies involving GST amounting to ₹287.69 Crore, as detailed hereunder,

Financial	Тах Туре		
Year	IGST	CGST	SGST
2019-20	63,90,636	18,44,26,078	18,44,26,078
2020-21	44,55,47,708	28,90,94,584	28,90,94,584
2021-22	27,64,48,776	51,66,24,785	51,66,24,785
2022-23	-	8,41,32,929	8,41,32,929
Total	72,83,87,120	107,42,78,376	107,42,78,376

(F) M/s Montage Flexipack Sales Pvt. Ltd., Lucknow: As detailed in para 4.2 (F), as per GSTR-1M, M/s MFSPL, Lucknow had issued tax invoices to various bogus firms/companies involving GST amounting to ₹99.18 Crore, as detailed hereunder,

Financial	Тах Туре		
Year	IGST	CGST	SGST
2019-20	2,49,36,150	17,28,37,072	17,28,37,072
2020-21	6,58,55,042	27,76,65,143	27,76,65,143
Total	9,07,91,192	45,05,02,215	45,05,02,215

(G) M/s Montage Printpack Sales Pvt. Ltd., Gwalior: As detailed in para 4.2 (G), as per GSTR-1M, M/s MPSPL, Gwalior had issued tax invoices to various bogus firms/companies involving GST amounting to ₹38.19 Crore, as detailed hereunder,

Financial	Тах Туре		
Year	IGST	CGST	SGST
2019-20	3,00,08,927	3,75,39,460	3,75,39,460
2020-21	5,59,34,523	4,38,64,631	4,38,64,631
2021-22	2,38,39,876	4,54,60,939	4,54,60,939
2022-23	-	91,74,876	91,74,876
Total	10,97,83,326	13,60,39,906	13,60,39,906

10.5 Whereas, during the investigation, summon dated 12.10.2023 was issued to M/s MSPL, Delhi in reply to which vide E-Mail dated 20.10.2023 (**RUD-426**) it was intimated that M/s Lagrowth Associates Pvt. Ltd. (Formerly known as M/s Montage Sales Pvt. Ltd.) had dues payable to M/s Montage Enterprises Pvt. Ltd., however, the said payable dues have been defaulted. Subsequently, M/s MEPL filed an application under



Section 9 of the Insolvency and Bankruptcy Code, 2016. The application was admitted into Corporate Insolvency Resolution Process by the Hon'ble National Company Law Tribunal, New Delhi-Bench-IV vide order dated 10.02.2023 and Shri Mohan Lal Jain has been appointed as the Insolvency Resolution Professional of the Corporate Debtor vide Hon'ble NCLT order dated 10.02.2023.

10.5.1Whereas, as per Hon'ble NCLT order dated 10.02.2023 M/s MSPL, Delhi defaulted the payment of **₹554,88,94,974/-** which includes principal amount of **₹516,17,62,767/-** and interest amounting **₹38,71,32,207/-** @18% p.a. on the outstanding principal. Therefore, M/s MEPL filed application under Section 9 of the Insolvency and Bankruptcy Code, 2016 with a prayer to initiate Corporate Insolvency Resolution Process in respect of M/s MSPL. The applicant (M/s MEPL) submitted that as per the terms of the said agreement dated 19.09.2019, the applicant supplied goods to the corporate debtor (M/s MSPL) in furtherance of which the applicant raised the bills. The corporate debtor had started making willful default in payments to the applicant despite several repeated requests and reminders by the applicant and cited the difficulties of financial crunch due to COVID-19 and other factors.

And whereas, M/s MSPL received supply of goods of invoice value amounting to **₹516,17,62,767/-** (Taxable value **₹437,43,75,226/-** + **GST ₹78,73,87,541/-**) from M/s MEPL and availed Input Tax Credit of **₹78,73,87,541/-**, but as per Hon'ble NCLT order dated 10.02.2023, M/s MSPL, Delhi had not made payment of ₹516,17,62,767/- to M/s MEPL.

10.5.2 Whereas, as per proviso to Section 16(2) of CGST Act, 2017 read with rule 37 of the CGST Rules, 2017, where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the Input Tax Credit availed by the recipient shall be added to his output tax liability, along with interest thereon.

In view of the proviso to Section 16(2) of CGST Act, 2017 read with Rule 37 of CGST Rules, 2017 as amended, M/s MSPL was required to add amount equal to ₹78,73,87,541/- (equal to amount of ITC availed) to his output tax liability, along with interest thereon for which he defaulted to pay the value of supply along with tax payable thereon within a period of 180 days. However, M/s MSPL, Delhi had failed to add the said amount to their output tax liability and payment thereof. Hence, the said amount is liable to be recovered from them.

10.6 Whereas, during the investigation, summon dated 12.10.2023 was issued to M/s MFSPL, Lucknow in reply to which vide E-Mail dated 19.10.2023 (**RUD-427**) it was



intimated that M/s Neemsar Vyappar Pvt. Ltd. (Formerly known as M/s Montage Flexipack Sales Pvt. Ltd.) had dues payable to M/s Montage Enterprises Pvt. Ltd., however, the said payable dues have been defaulted. Subsequently, M/s MEPL filed an application under Section 9 of the Insolvency and Bankruptcy Code, 2016. The application was admitted into Corporate Insolvency Resolution Process by the Hon'ble National Company Law Tribunal, New Delhi-Bench-III vide order dated 23.12.2022 and Shri Mohan Lal Jain has been appointed as the Insolvency Resolution Professional of the Corporate Debtor vide Hon'ble NCLT order dated 23.12.2022.

10.6.1Whereas, as per Hon'ble NCLT order dated 23.12.2022 M/s MFSPL, Lucknow defaulted the payment of principal amount of **₹6,74,28,927/-** and interest amounting **₹59,67,490/-** @18% p.a. on the outstanding principal. Therefore, M/s MEPL filed application under Section 9 of the Insolvency and Bankruptcy Code, 2016 with a prayer to initiate Corporate Insolvency Resolution Process in respect of M/s MFSPL. The applicant (M/s MEPL) submits that as per the terms of the said agreement dated 19.09.2019, the applicant supplied goods to the corporate debtor (M/s MFSPL) in furtherance of which the applicant raised the bills. The corporate debtor started making default in payments to the applicant and the invoice(s) since 24.11.2021 went unpaid by the corporate debtor.

And whereas, M/s MFSPL received supply of goods of invoice value amounting to **₹6,74,28,927/-** (Taxable value **₹5,71,43,159/-** + **GST ₹1,02,85,769/-**) from M/s MEPL and availed Input Tax Credit of **₹1,02,85,769/-**, but as per Hon'ble NCLT order dated 23.12.2022, M/s MFSPL, Lucknow had not made payment of ₹6,74,28,927/- to M/s MEPL.

10.6.2 Whereas, as per proviso to Section 16(2) of CGST Act, 2017 read with rule 37 of the CGST Rules, 2017, where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the Input Tax Credit availed by the recipient shall be added to his output tax liability, along with interest thereon.

In view of the proviso to Section 16(2) of CGST Act, 2017 read with Rule 37 of CGST Rules, 2017 as amended, M/s MFSPL was required to add amount equal to **₹1,02,85,769/-** (equal to amount of ITC availed) to his output tax liability, along with interest thereon for which he defaulted to pay the value of supply along with tax payable thereon within a period of 180 days. However, M/s MFSPL, Lucknow had failed to add the said amount to his output tax liability and payment thereof. Hence, the said amount is liable to be recovered from them.



10.7 Whereas, during the investigation, summon dated 12.10.2023 was issued to M/s MPSPL, Gwalior in reply to which vide E-Mail dated 20.10.2023 **(RUD-428)** it was intimated that M/s Pitambara Business Promotions Pvt. Ltd. (Formerly known as M/s Montage Printpack Sales Pvt. Ltd.) had dues payable to M/s Montage Enterprises Pvt. Ltd., however, the said payable dues have been defaulted. Subsequently, M/s MEPL filed an application under Section 9 of the Insolvency and Bankruptcy Code, 2016. The application was admitted into Corporate Insolvency Resolution Process by the Hon'ble National Company Law Tribunal, New Delhi-Bench-III vide order dated 23.12.2022 and Shri Mohan Lal Jain has been appointed as the Insolvency Resolution Professional of the Corporate Debtor vide Hon'ble NCLT order dated 23.12.2022.

10.7.1 Whereas, as per Hon'ble NCLT order dated 23.12.2022 M/s MPSPL, Gwalior defaulted the payment of **₹23,71,67,214/-** which includes principal amount of **₹22,77,70,160/-** and interest amounting **₹93,97,054/-** @18% p.a. on the outstanding principal. Therefore, M/s MEPL filed application under Section 9 of the Insolvency and Bankruptcy Code, 2016 with a prayer to initiate Corporate Insolvency Resolution Process in respect of M/s MPSPL. The applicant (M/s MEPL) submits that as per the terms of the said agreement dated 19.09.2019, the applicant supply goods to the corporate debtor (M/s MSPL) in furtherance of which the applicant raised the bills. The corporate debtor started making default in payments to the applicant and the invoice(s) since 30.04.2021 went unpaid by the corporate debtor.

And whereas, M/s MPSPL received supply of goods of invoice value amounting to **₹22,77,70,160/-** (Taxable value **₹19,30,25,560/-** + **GST ₹3,47,44,601/-**) from M/s MEPL and availed Input Tax Credit of **₹3,47,44,601/-**, but as per Hon'ble NCLT order dated 23.12.2022, M/s MPSPL, Gwalior had not made payment of ₹22,77,70,160/- to M/s MEPL.

10.7.2 Whereas, as per proviso to Section 16(2) of CGST Act, 2017 read with rule 37 of the CGST Rules, 2017, where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the Input Tax Credit availed by the recipient shall be added to his output tax liability, along with interest thereon.

In view of the proviso to Section 16(2) of CGST Act, 2017 read with Rule 37 of CGST Rules, 2017 as amended, M/s MPSPL, Gwalior was required to add amount equal to **₹3,47,44,601/-** (equal to amount of ITC availed) to his output tax liability, along with interest thereon for which he defaulted to pay the value of supply along with tax payable thereon within a period of 180 days. However, M/s MPSPL, Gwalior had failed to add the



said amount to his output tax liability and payment thereof. Hence, the said amount is liable to be recovered from them.

10.8 Whereas, during the investigation, Shri Vinay Rewari, Proprietor of M/s Katyayni Enterprises (07AHGPR4479K1ZO), had unequivocally admitted that they had availed ITC amounting to **₹7,68,578/-**, on the basis of tax invoices issued by M/s MSPL, Delhi in violation of the Section 16(2) of CGST Act, 2017, i.e., without receipt of supply of goods. Hence, the said amount is liable to be recovered from them.

11. SUMMARY OF INVESTIGATION:

11.1 Whereas, from the investigation conducted as discussed in detail in aforesaid paras, it appears that M/s Montage Enterprises Pvt. Ltd. (all manufacturing units), M/s Montage Sales Pvt. Ltd., Delhi, M/s Montage Flexipack Sales Pvt. Ltd., Lucknow, and M/s Montage Printpack Sales Pvt. Ltd., Gwalior were engaged in issuing of tax invoices of packaging material to various bogus (non-existing/non-operational) firms without supply of goods. Further, they were also indulged in clandestine supply of the underlying goods to various Pan masala/Chewing Tobacco manufacturers.

11.2 Whereas, the investigations have revealed that during the period July 2017 to September 2019, the tax invoices were issued to bogus (non-existing/non-operational) firms directly by the manufacturing units of M/s MSPL. The underlying goods were clandestinely supplied to various Pan Masala and Chewing Tobacco manufacturers. Further, M/s MEPL came with a nefarious design to distance itself i.e., M/s MEPL inducted a layer between the company and bogus (non-existing/non-operational) firms, and for this in September 2019, the directors of M/s MEPL, Shri Arvind Gupta and Shri Yogeshwar Singh created companies (using name Montage) at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel were made directors of M/s MSPL, Delhi; Shri Sandeep Jain and Shri Nikhil Agnihotri were made directors of M/s MFSPL, Lucknow Shri Sushil Singh & Shri Gagandip Singh Bawa were made directors of M/s MPSPL, Gwalior, etc.

11.3 Whereas, the investigations have also revealed that after October 2019 onwards M/s MEPL had supplied most of the packaging material manufactured by them to said depots/warehouse (M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior, etc.) and very limited supply was made to some genuine buyers such as Haldiram, Adani Wilmar, Mother Dairy, Paras Dairy, Various Oil manufacturing units etc.

And whereas, from October 2019 onwards the aforesaid depots had started the modus-operandi of clandestine supply of the packaging materials to various Pan Masala and Chewing Tobacco manufacturers. They also started issuing tax invoices of packaging material to various bogus (non-existing/non-operational) firms without supply of goods.



11.4 Whereas, investigation conducted against the various bogus (non-existent/ nonoperational) firms to whom M/s MEPL (all manufacturing unit); M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior had shown supply of goods revealed that no supply was made to those firms and they had never issued any purchase order to M/s MEPL or M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior. Further, during search at the residential premises of Shri Sujeet Kumar Singh, owner of M/s BTCPL, Noida a file resumed under the INS-02 of the Panchnama dated 25.06.2021 (@ Sl. No. 17), wherein details of packaging material (date of supply, quantity, no. of boxes, value of the goods and place of supply) along with actual brand name of Pan Masala/Chewing tobacco (to whom goods were actually supplied) and name of fake firm (in whose name invoices were raised), were found to have been maintained, from which it evident that goods were issued in the name of fake firms.

And whereas, it is pertinent to mention that Shri H.S. Matharu & Shri Jasmeet Singh, Directors of M/s MSPL, Delhi; Shri Sandeep Jain & Shri Nikhil Agnihotri, Directors of M/s MFSPL, Lucknow and Shri Sushil Singh & Shri Gagandip Singh Bawa Directors of M/s MPSPL, Gwalior, were working as Marketing Personnel in M/s MEPL for more than 10-15 years, before they purportedly started new companies and started trading of goods supplied only by M/s MEPL. After booking of the case against these companies, they all had resigned from their respective companies and again purported to have joined back their parent company i.e., M/s MEPL without any change in their perquisites.

And whereas, after booking of the case against M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior they had purportedly changed their name to hide their identity. M/s Montage Sales Pvt. Ltd., is now known as M/s Lagrowth Associates Pvt. Ltd., M/s Montage Flexipack Sales Pvt. Ltd., is now known as M/s Neemsar Vyappar Pvt. Ltd., and M/s Montage Printpack Sales Pvt. Ltd., is now known as M/s Pitambara Business Promotions Pvt. Ltd.

And whereas, the directors of M/s MSPL, Delhi and M/s MFSPL, Lucknow in their respective statement concurred that being directors they were doing the same work as they do in M/s MEPL *i.e.*, looking for new business development in various industries requiring the packaging material and giving services to their existing customers, only difference is that they draw salary from their respective companies in which they were directors. The BSR reports resumed during the searches at manufacturing units of M/s MEPL, revealed that they continued working as Marketing Officers of M/s MEPL as they were working before formation of these depots. Further, they also confirmed that they again joined their parent company i.e., M/s MEPL after investigations started and are getting same salary from M/s MEPL.



And whereas, from the above discussion it appears, that the directors of M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior, were in fact dummy directors and all these companies were created and managed by senior officials of M/s MEPL to facilitate and abet huge tax evasion by Pan masala and Chewing Tobacco manufacturers by clandestine supply of packaging materials to them in guise of the tax invoices issued to bogus firms.

11.5 Whereas, it also appears that whole purchase of packaging material by M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior (which contains specific brand name of actual customer/manufacturer who is going to utilize that packaging material) was from different manufacturing unit of M/s MEPL only. Further, M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior had issued tax invoices to various bogus firms, but in fact the goods were clandestinely supplied to Pan masala/Chewing Tobacco manufacturer, for whom it was manufactured, as the packaging material contains brand name of the specific Pan masala and Chewing Tobacco, it could not have been used anywhere else. Thus, the tax invoices issued by M/s MEPL, M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior to bogus (non-existent/non-operational) firms discussed in para 4.2, showing supply of packaging material was issued with intent to pass on irregular ITC without supply of goods.

And whereas, M/s MEPL (all manufacturing unit) purposely did not maintain records showing brand-wise packaging material manufactured/supplied by them to Pan Masala/Chewing Tobacco manufacturer to hoodwink the department. However, when the packaging material was supplied to genuine buyers, the tax invoices itself contains details of brand, packing size, MRP etc. Similarly, M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior also did not maintain records showing brand-wise packaging material traded by them.

11.6 Whereas, during the investigation, it has been found that various persons of marketing team of M/s MEPL, collected cash from Pan Masala & Chewing Tobacco manufacturing units (for supply of packaging material supplied by M/s MPEL, M/s MSPL, Delhi, M/s MFSPL, Lucknow and M/s MPSPL, Gwalior) through various brokers/ Angadias. The extensive investigations have revealed that this cash was then routed through complex web of Angadias and fake firms to bank accounts of M/s MEPL or M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior. After receipt of money in the bank account of M/s MSPL, Delhi; M/s MFSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Lucknow and M/s MPSPL, Gwalior, it was transferred through banking channel to M/s MEPL to give it colour of genuine transactions.

11.8 Whereas, during scrutiny of sale and purchase ledger and creditor and debtor statements of M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior it is noticed that in addition to supply to genuine buyers they had shown substantial supply



to bogus firms. Further, it also appears that huge amount pending from these bogus firms even though they continuously made supplies to bogus firms without having any written agreement or written order with these bogus firms. It also appears that only partial amount was recovered from bogus firms or even in some cases no payment was recovered from the bogus firms. On scrutiny of bank account statement of M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior, it appears that they had received payment from some firms/companies to whom either no supply was made, or excess payment was recovered in comparison to total supply. For example, in bank account of M/s MFSPL, Lucknow payment was credited from M/s Jyoti Traders and M/s K N Traders whereas as per GSTR-1M there was no supply to these firms.

11. ROLE OF DIRECTORS AND KEY-PERSONS OF M/S MEPL; M/S MSPL, DELHI; M/S MFSPL, LUCKNOW AND M/S MPSPL, GWALIOR:

Mr. Arvind Gupta, Promoter Director of M/S MEPL: Mr. Arvind Gupta is 11.1 Promoter Director of M/s MEPL, Noida in his statements dated 15.11.2021 & 06.12.2021 deposed that, he is active director of M/s MEPL since its incorporation i.e., 2002 and having manufacturing units at Noida, Haridwar, Malanpur, Jammu; M/s MEPL is engaged in manufacturing of paper and plastic based laminates, pouches used in FMCG goods which includes, namkeen, milk, oil, Pan Masala/Chewing Tobacco etc.; being director he is looking after day-to-day financial matters, purchase and expansion of company etc.; Their company does not enter into any agreement with Pan Masala/Chewing Tobacco manufacturers. However, they have entered into agreement with their depot/trading company which includes M/s MSPL, Delhi, M/s MFSPL, Lucknow, M/s MPSPL, Gwalior and M/s MPSPL, Jaipur etc.; on being shown panchnama drawn at the registered premises of bogus firms he has given evasive reply that as per his knowledge they have supplied goods to these firms, whereas they all were found non-existent at their registered premise; on being shown statement of Shri Pramod Bansal he has refrained from factual reply and submitted that 'he has to check the details'. Despite controlling finance, purchase, and sale of M/s MEPL, he could not put forth any satisfactory reply; on being asked that M/s MEPL and its depots while supplying laminates to Pan Masala/Chewing Tobacco units and bogus firms/companies did not reflect the complete description of products whereas if supply made to others complete description was mentioned, he refrained from factual reply and submitted that 'he did not interfere in day-to-day business of the company. Despite controlling and looking financial matters of the company.

Mr. Prashant Kumar Singh (Senior DGM (Finance) of M/s MEPL in his statement dated 15.06.2021 deposed that, Shri Arvind Gupta looks after the administration, finance, production, and accounts of the company.



Mr. Harvinder Singh Matharu & Mr. Jasmeet Singh directors of M/s MSPL, Delhi and Mr. Nikhil Agnihotri & Mr. Sandeep Jain directors of M/s MFSPL, Lucknow in their respective statement admitted that in September 2019, the directors of M/s MEPL planned a new business model for the distribution of packaging materials, and for that M/s MEPL had created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel of M/s MEPL were made directors of these 6 depots. M/s MSPL, Delhi was created to look over trading of goods manufactured by M/s MEPL, in region of Delhi & UP. M/s MFSPL looks over trading of goods manufactured by M/s MEPL in Central and Eastern Uttar Pradesh. They also admitted the supply of packaging material to Pan Masala/Chewing Tobacco manufacturer in guise of tax invoices issued to bogus firms, and payment collection in those cases also lied with M/s MEPL.

Further, Mr. Arvind Gupta being the active Director of M/s MEPL, was responsible for all day-to-day activity which included manufacturing and supply of finished goods and collection of payment from the buyers. Being the active director of M/s MEPL and actual controller of M/s MSPL, Delhi, M/s MFSPL, Lucknow, M/s MPSPL, Gwalior, Mr. Arvind Gupta had played active role in clandestine supply of goods to Pan Masala/Chewing Tobacco manufacturers with an intention to defraud the Government exchequer. He was actively involved in such a scam in a planned manner with their management with the objective of causing damage to the economy of the nation. Mr. Arvind Gupta has caused wrongful loss to the government exchequer by clandestine supply of packaging material to Pan Masala/Chewing Tobacco manufacturers.

Thus, it appears that he is the person at whose instance the transaction covered under clauses (i), (ii), (vii) or clause (ix) of Section 122(1) was conducted, and hence he is liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A). Further, Mr. Arvind Gupta appears to be liable for penalty under Section 122(3)(a), (c) & (e) being person who aids or abets any of the offences specified in clauses (i) to (xxi) of Section 122(1), receives or is in any way concerned with the supply of, or in any other manner deals with any supply of services which he knows or has reasons to believe are in contravention of any provisions of this Act or the rules made thereunder and fails to issue invoice in accordance with the provisions of this Act or the rules made thereunder or fails to account for an invoice in his books of account.

11.2 Mr. Yogeshwar Singh, Director of M/S MEPL: Mr. Yogeshwar Singh, Director of M/s MEPL, he is active director of M/s MEPL and being director, he is looking after marketing and sale. Mr. Pramod Bansal in his statement dated 02.07.2021 admitted that from July 2017 to December 2017, he received cash through Shri Yogeshwar Singh and after depositing the same to his account he transferred the same to the account of the same to the same to the same to the account of the same to the account of the same to the account of the same to the same to the account of the same to the same



M/s MEPL (11061310000131). Mr. Ajay Kumar Tripathi, DGM (Production) M/s MEPL, Jammu in his statement dated 02.07.2021 admitted that Shri Yogeshwar Singh telephonically informed Shri Manoj Kumar, Senior Officer regarding the dispatches.

Shri Kapil Dev Sharma, Assistant Manager (Store In-charge Raw Material) and Shri Pradeep Kumar, DGM (Production) of M/s MEPL, Haridwar in their statements dated 15.06.2021 admitted that the directions regarding production of packaging material were being given by Mr. Yogeshwar Singh, and he is the key persons who takes care of sales of the company.

Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur in his statements dated 15.06.2021 admitted that all the purchase orders were received verbally from Noida Office, through Mr. Yogeshwar Singh and supply to M/s MSPL, Delhi, M/s MFSPL, Lucknow, M/s MPSPL, Gwalior were made on the direction Mr. Yogeshwar Singh.

Mr. Harvinder Singh Matharu & Mr. Jasmeet Singh directors of M/s MSPL, Delhi and Mr. Nikhil Agnihotri & Mr. Sandeep Jain directors of M/s MFSPL, Lucknow in their respective statement admitted that in September 2019, the directors of M/s MEPL planned a new business model for the distribution of packaging materials, and for that M/s MEPL has created depots/warehouses at six places across the country viz. Lucknow, Delhi, Jaipur, Gwalior, Vapi & Hyderabad, and 12 senior marketing personnel of M/s MEPL were made directors of these 6 depots.

Further, during recording of statement of Mr. Yogeshwar Singh, he was confronted with the above facts, but he made evasive reply and tried to abstain himself from every allegation. However, in fact being the active Director of M/s MEPL, he was responsible for marketing and sale of finished goods and collection of payment from the buyers. Being the active director of M/s MEPL, Mr. Yogeshwar Singh had played active role in clandestine supply of goods to Pan Masala/Chewing Tobacco manufacturers on the guise of tax invoices issued to bogus firms with an intention to defraud the Government exchequer. He was actively involved in such a scam with a planned manner with the objective of causing damage to the economy of the nation.

Thus, it appears that he is the person at whose instance the transaction covered under clauses (i), (ii), (vii) or clause (ix) of Section 122(1) was conducted, and hence he shall be liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A). Further, Mr. Yogeshwar Singh appears to be liable for penalty under Section 122(3)(a), (c) & (e) being person who aids or abets any of the offences specified in clauses (i) to (xxi) of Section 122(1), receives or is in any way concerned with the supply of, or in any other manner deals with any supply of services which he knows or has reasons to believe are in contravention of any provisions of this Act or the rules made



thereunder and fails to issue invoice in accordance with the provisions of this Act or the rules made thereunder or fails to account for an invoice in his books of account.

11.3 Mr. Harvinder Singh Matharu, Director of M/s MSPL, Delhi: Mr. Harvinder Singh Matharu, Director of M/s MSPL, Delhi in his statements dated 15.11.2021, concurred with the submissions made by Shri Sushil Dwivedi and Shri Puneet Mishra, employees of M/s MSPL, wherein they had stated that Mr. Harvinder Singh Matharu gave the complete directions regarding to whom GSTIN invoices were to be issued and through which transporter/vehicle the said goods were to be supplied. Mr. Harvinder Singh Matharu has concurred with the statement of Mr. Sujeet Kumar Singh, owner of M/s Bharat Transport company Pvt Ltd, wherein he (Mr. Sujeet) had admitted transportation of printed laminates clandestinely supplied by M/s MSPL, Delhi to Pan Masala/Tobacco manufacturers. The same has been admitted by manufacturer of pan masala i.e. (i) M/s A J Sugandhi Pvt Ltd, Kanpur, (ii) M/s K.G. Pan Products Pvt. Ltd., Gorakhpur and (iii) M/s Kay Pan Fragrances Pvt Ltd, Ghaziabad. On being asked about the supply of finished goods (laminates) to 66 non-existent firms from M/s MSPL, Mr. Harvinder Singh Matharu, in his statement dated 15.11.2021 has given evasive reply by answering that he has to check the records and then revert. However, on physical verification, these buyer firms were found to be non-existent at their registered place of business. on being shown entry on page number 234 of file @ Sl.No. 17 resumed under Panchnama dated 25.06.2021 which reflected details of goods sold in May 2021, and invoice no. 865 & 866 issued on 02.05.2021 to M/s Convergent Alliance and M/s Blue Star whereas as per entry on page number 234 of file @ Sl.No. 17 the goods pertained to various Pan Masala/ Tobacco manufacturers, he admitted that invoices in the said cases had been issued to different firms. The goods were clandestinely supplied to the actual manufacturer i.e., Ganesh and Sudarshan Pan Masala.

Mr. Punit Kumar Mishra (Accountant) and Mr. Sushil Kumar Dwivedi, (Dispatch Manager) of M/s MSPL in his statement dated 15.06.2021 deposed that, Mr. Harvinder Singh Matharu gave the GSTIN certificate to him and he makes a ledger in respect of all those parties who do not issue any purchase order and Mr. Harvinder Singh Matharu selects transporter through which the goods are to be sent to those buyers. They also stated that, they received a packing list with the invoices, and the same was forwarded to the buyer and no record of the same is maintained by them on the director of Mr. Harvinder Singh Matharu.

Further, Mr. Harvinder Singh Matharu being the active Director of M/s MSPL, was responsible for all day-to-day activity which includes purchase, sale, and finance. Mr. Harvinder Singh Matharu being the ex-marketing employee of M/s MEPL and director of M/s MSPL, Delhi played active role in clandestine supply of goods to Pan Masala/ Chewing Tobacco manufacturers with an intention to defraud the Government



exchequer. He was actively involved in such a scam in a planned manner in collusion with M/s MEPL with the objective of causing damage to the economy of the nation. Mr. Harvinder Singh Matharu has caused wrongful loss to the government exchequer by clandestine supply of packaging material to Pan Masala/Chewing Tobacco manufacturers.

Thus, it appears that he is the person at whose instance the transaction covered under clauses (i), (ii), (vii) or clause (ix) of Section 122(1) was conducted, and hence he shall be liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A). Further, Mr. Harvinder Singh Matharu appears to be liable for penalty under Section 122(3)(a), (c) & (e) being person who aids or abets any of the offences specified in clauses (i) to (xxi) of Section 122(1), receives or is in any way concerned with the supply of, or in any other manner deals with any supply of services which he knows or has reasons to believe are in contravention of any provisions of this Act or the rules made thereunder and fails to issue invoice in accordance with the provisions of this Act or the rules made thereunder or fails to account for an invoice in his books of account.

11.4 Mr. Jasmeet Singh, Director of M/s MSPL, Delhi: Mr. Jasmeet Singh, Director of M/s MSPL, Delhi in his statements dated 26.04.2022, concurred with the submissions made by Shri Sushil Dwivedi and Shri Puneet Mishra, employees of M/s MSPL, wherein they have stated that Mr. Jasmeet Singh gave directions regarding on whom GSTIN invoices were to be issued and through which transporter/vehicle the said goods were to be supplied. Mr. Jasmeet Singh has concurred with the statement of Mr. Harvinder Singh Matharu, wherein he admitted that invoices had been issued to different firms/companies and goods were supplied to the actual Pan Masala and Tobacco manufacturers. The same has been admitted by manufacturer of pan masala i.e. (i) M/s A J Sugandhi Pvt Ltd, Kanpur, (ii) M/s K.G. Pan Products Pvt. Ltd., Gorakhpur and (iii) M/s Kay Pan Fragrances Pvt Ltd, Ghaziabad.

Mr. Punit Kumar Mishra (Accountant) and Mr. Sushil Kumar Dwivedi, (Dispatch Manager) of M/s MSPL in their statements dated 15.06.2021 deposed that, on the instruction of Mr. Jasmeet Singh supplies to all those parties were made who do not place Purchase Orders. They also stated that, they received a packing list with the invoices, and the same was forwarded to the buyer and no record of the same was maintained by them as directed by Mr. Jasmeet Singh.

Further, Mr. Jasmeet Singh being the active Director of M/s MSPL, was responsible for all day-to-day activity which includes purchase, sale, and finance. Mr. Jasmeet Singh being the ex-marketing employee of M/s MEPL and director of M/s MSPL, Delhi played active role in clandestine supply of goods to Pan Masala/Chewing Tobacco manufacturers with an intention to defraud the Government exchequer. He was



actively involved in such a scam in a planned manner in collusion with M/s MEPL with the objective of causing damage to the economy of the nation.

Thus, it appears that he is the person at whose instance the transaction covered under clauses (i), (ii), (vii) or clause (ix) of Section 122(1) was conducted, and hence he shall be liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A). Further, Mr. Jasmeet Singh appears to be liable for penalty under Section 122(3)(a), (c) & (e) being person who aids or abets any of the offences specified in clauses (i) to (xxi) of Section 122(1), receives or is in any way concerned with the supply of, or in any other manner deals with any supply of services which he knows or has reasons to believe are in contravention of any provisions of this Act or the rules made thereunder and fails to issue invoice in accordance with the provisions of this Act or the rules made thereunder or fails to account for an invoice in his books of account.

11.5 Further, Mr. Sandeep Jain & Mr. Nikhil Agnihotri Directors of M/s MFSPL, Lucknow and Mr. Sushil Singh & Mr. Gagandip Singh Bawa Directors of M/s MPSPL, Gwalior are also liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a), (c) & (e).

11.6 Further, M/s Bharat Transport company Pvt. Ltd., and Mr. Sujeet Kumar Singh owner of M/s Bharat Transport company Pvt. Ltd., for their active role in transportation of goods clandestinely supplied by M/s MEPL & its depots are liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a), (b), (c) & (d).

11.6 Further, M/s Paras Transport Co., M/s Raj Kumar Transports, M/s Pitambara Freight Carriers, M/s Sahara Transport Co., and M/s Radha Krishna Freight Carrier through their proprietors/partners, for their active role in transportation of goods clandestinely supplied by M/s MEPL & its depots are liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a), (b), (c) & (d).

11.7 Mr. Shekhar Gupta and Mr. Sandeep Gupta for their active role in managing the bogus firms and rotation of funds through various bogus firms are liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a) & (c).

11.8 Mohd. Shadab Quadri and Mohd. Ali Akram Khan for their active role in managing the bogus firms and rotation of funds through various bogus firms are liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a) & (c).

11.9 Mr. Dipanshu Gupta and Mr. Sarang Jhunjhunwala for their active role in managing the bogus firms and rotation of funds through various bogus firms are liable to



a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a) & (c).

11.10 Mr. Ratan Chand, for their active role in rotation of funds through his company M/s Dealistix India Pvt. Ltd., are liable to a penalty of an amount equivalent to the tax evaded under the provisions of Section 122(1A) and under Section 122(3)(a) & (c).

12. DEMAND AND PENAL PROVISION:

12.1 M/s MEPL, Jammu, Haridwar, Noida & Malanpur; M/s MSPL, Delhi; M/S MFSPL, Lucknow and M/S MPSPL, Gwalior: From the discussions made in aforesaid para, it appears that manufacturing unit of M/s MEPL and depots of M/s MEPL namely M/s MSPL, Delhi; M/s MFSPL, Lucknow and M/s MPSPL, Gwalior were indulged in issuing tax invoices to various bogus (non-existent/non-operational) firms/companies and also involved in clandestinely supply of goods to Pan Masala/ Chewing Tobacco manufacturers.

As per explanation 2 to the Section 74 of the CGST Act, 2017 "For the purposes of this Act, the expression "suppression" shall mean non-declaration of facts or information which a taxable person is required to declare in the return, statement, report or any other document furnished under this Act or the rules made thereunder, or failure to furnish any information on being asked for, in writing, by the proper officer".

In the instant case it appears that M/s MEPL and its depots knowingly and intentionally had issued tax invoices to various bogus firms and goods were clandestinely supplied to Pan Masala/ Chewing Tobacco manufacturers. Further, by issuing tax invoices to various bogus firms, M/s MEPL and its depots knowingly and intentionally had passed on ineligible ITC to those bogus firms. Hence, it appears that M/s MEPL and its depots had not declared the true and correct facts to the department w.r.t. outward supply of goods. Therefore, it appears, that M/s MEPL and its depots have suppressed the facts with intent to evade GST. It was only after specific intelligence was gathered and subsequent investigations was carried out by the officers of the DGGI, Meerut Zonal Unit, Meerut, against M/s MEPL and its depots it was unearthed that M/s MEPL and its depots had clandestinely supplied goods to various Pan Masala/Tobacco manufacturing unit. They also issue invoices to various bogus (non-existent/non-operational) firms/ companies, in contraventions of the provisions of the CGST Act, 2017. The said irregularities would not have come to light if investigations had not been conducted by the DGGI, Meerut Zonal Unit, Meerut. Therefore, the extended period of limitation, in terms of explanation 2 of the Section 74 of the CGST Act, 2017 appears to be rightly invokable for demand and recovery.

12.1.1 Hence, it appears that M/s MEPL, Jammu, Haridwar, Noida & Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow & M/s MPSPL, Gwalior, have suppressed the facts



and contravened the aforesaid provisions of the CGST Act, 2017 and the Rules made there under with intent to evade payment of Goods and Services Tax. Therefore, the GST amounting to **₹982,55,04,616/-** against clandestine supply of goods, as detailed in foregoing paras appears to be demanded and recoverable under the provisions of Section 74(1) of the CGST Act, 2017 along with applicable interest under the provisions of Section 50(3) of the CGST Act, 2017 and penalty. The company-wise GST liability is as under,

GSTIN & Name of	Тах Туре			
the Taxpayer	IGST	CGST	SGST	TOTAL
01AACCM8173H1ZM M/s MEPL, Jammu	69,15,19,785	1,82,75,377	1,82,75,377	72,80,70,539
05AACCM8173H1ZE	232,03,78,923	_	_	232,03,78,923
M/s MEPL, Haridwar 09AACCM8173H1Z6				
M/s MEPL, Noida	94,21,41,565	17,25,19,712	17,25,19,712	128,71,80,989
23AACCM8173H1ZG M/s MEPL, Malanpur	99,75,67,739	12,08,51,897	12,08,51,897	123,92,71,533
07AAMCM9016D1ZG M/s MSPL, Delhi	72,83,87,120	107,42,78,376	107,42,78,376	287,69,43,872
09AAMCM9015A1ZJ M/s MFSPL, Lucknow	9,07,91,192	45,05,02,215	45,05,02,215	99,17,95,622
23AAMCM9078M1ZP M/s MPSPL, Gwalior	10,97,83,326	13,60,39,906	13,60,39,906	38,18,63,138
Total	588,05,69,650	197,24,67,483	197,24,67,483	982,55,04,616

12.1.2 Hence, it also appears that M/s MEPL and its depots had supplied goods to Pan Masala/Tobacco Manufacturer, without issuing any invoice or issues an incorrect or false invoice involving GST amounting to **₹982,55,04,616/-**. Further, it also appears that M/s MEPL and its depots had issued tax invoices to various bogus firms/companies discussed in para 4 and without supply of goods passed on ineligible ITC amounting to **₹982,55,04,616/-** Crore. Hence, in terms of the provisions of Section 122(1)(*i*) & (*ii*) of the CGST Act, 2017, M/s MEPL, Jammu, Haridwar, Noida & Malanpur; M/s MSPL, Delhi; M/s MFSPL, Lucknow & M/s MPSPL, Gwalior are liable for penalty for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply and penalty for issuance of tax invoices or bills without supply of goods respectively. The company-wise penal proposal is as under,

GSTIN & Name of	Тах Туре			
the Taxpayer	IGST	CGST	SGST	TOTAL
01AACCM8173H1ZM	60.15.10.595	1 90 75 077		
M/s MEPL, Jammu	69,15,19,785	1,82,75,377	1,82,75,377	72,80,70,539
05AACCM8173H1ZE	000 00 79 000			000 00 =9 000
M/s MEPL, Haridwar	232,03,78,923			232,03,78,923
09AACCM8173H1Z6				
M/s MEPL, Noida	94,21,41,565	17,25,19,712	17,25,19,712	128,71,80,989
23AACCM8173H1ZG	99,75,67,739	12,08,51,897	12,08,51,897	123,92,71,533



M/s MEPL, Malanpur				
07AAMCM9016D1ZG	72,83,87,120	107,42,78,376	107,42,78,376	287,69,43,872
M/s MSPL, Delhi	/2,03,0/,120	10/,42,/0,3/0	10/,42,/0,3/0	20/,09,43,0/2
09AAMCM9015A1ZJ	0.07.01.100			00 17 05 699
M/s MFSPL, Lucknow	9,07,91,192	45,05,02,215	45,05,02,215	99,17,95,622
23AAMCM9078M1ZP	10.07.80.006	12 60 20 006	12 60 20 006	98 18 69 198
M/s MPSPL, Gwalior	10,97,83,326	13,60,39,906	13,60,39,906	38,18,63,138
Total	588,05,69,650	197,24,67,483	197,24,67,483	982,55,04,616

12.2 In view of the discussion made in para 10.5, it appears that M/s MSPL, Delhi is liable to pay GST amounting to **₹78,73,87,541/-**, in respect of Input Tax Credit availed without paying the value of supply along with tax payable thereon within a period of 180 days. Hence, the said amount is recoverable from M/s MSPL, Delhi under the provisions of Section 74(1) of the CGST Act, 2017 along with applicable interest under the provisions of Section 50 of the CGST Act, 2017 and penalty.

12.3 In view of the discussion made in para 10.6, it appears that M/s MFSPL, Lucknow is liable to pay GST amounting to **₹1,02,85,769/-**, in respect of which he defaulted to pay the value of supply along with tax payable thereon within a period of 180 days. Hence, the said amount is recoverable from M/s MFSPL, Lucknow under the provisions of Section 74(1) of the CGST Act, 2017 along with applicable interest under the provisions of Section 50 of the CGST Act, 2017 and penalty.

12.4 In view of the discussion made in para 10.7, it appears that M/s MPSPL, Gwalior is liable to pay GST amounting to **₹3,47,44,601/-**, in respect of which he defaulted to pay the value of supply along with tax payable thereon within a period of 180 days. Hence, the said amount is recoverable from M/s MPSPL, Gwalior under the provisions of Section 74(1) of the CGST Act, 2017 along with applicable interest under the provisions of Section 50 of the CGST Act, 2017 and penalty.

12.5 Further, it appears that M/s MEPL and its depots are also liable for penalty in terms of the provisions of Section 122(1)(x), (xiv), (xvi), (xvii) and (xx) of the CGST Act, 2017, read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for falsifying or substituting financial records or produces fake accounts or documents or furnishes any false information or return with an intention to evade payment of tax due under this Act; for transporting any taxable goods without the cover of documents as may be specified in this behalf; for failing to keep, maintain or retain books of account and other documents in accordance with the provisions of this Act or the rules made thereunder; for failing to furnish information or documents called for by an officer in accordance with the provisions of this Act; for supplying, transporting or storing any goods which he has reasons to believe are liable to



confiscation under this Act; for tampering with, or destroys any material evidence or document.

12.6 Further, in view of the discussions made in para 11, it appears that directors/key persons of M/s MEPL and transporters/middle persons for their active role in the modus operandi opted by M/s MEPL and its depots are liable for penalty under the provisions of Section 122(1A) and under the provisions of Section 122(3)(a), (c) & (e) and Section 127 of the CGST Act, read with similar provisions of the SGST Act, 2017, 2017 and/or under Section 20 of the IGST Act, 2017 as applicable.

12.7 Bogus Firms/companies: From the discussion made in para 4, it appears that all these firms/companies were bogus (non-existent/non-operational) firms/companies. Further, it also appears that all these firms/companies were created/operated in collusion with the officials of M/s MEPL and its depots solely for the purpose of supplying goods i.e., Printed Laminates to Pan Masala and Chewing Tobacco manufacturers, in guise of the tax invoices issued to these firms/companies.

Hence, it appears that these firms/companies are liable for penalty in terms of the provisions of Section 122(1)(vii) of the CGST Act, 2017, for taking or utilizing Input Tax Credit as detailed in **column (4) of Annexure-'B'**, without actual receipt of goods. It also appears that these firms/companies are liable for penalty in terms of the provisions of Section 122(1)(ii) of the CGST Act, 2017, for issuance of tax invoices or bills involving GST as detailed in **column (5) Annexure-'B'**, without supply of goods.

Further, it also appears that these firms/companies are liable for penalty in terms of the provisions of Section 122(1)(x), (xii), (xvi) and (xvii) of the CGST Act, 2017, read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for furnishing any false information or return with an intention to evade payment of tax due under this Act; for furnishing any false information, or subsequently; for failing to furnish information or documents called for by an officer in accordance with the provisions of this Act or the rules made thereunder or furnishes false information or documents during any proceedings under this Act.

Further, SCN to M/s Impact Traders (29BMUPS2847A1ZK) & M/s Multilayer Traders (29BVSPA2131G1ZP), was already issued by the jurisdictional Commissionerate, for imposing penalty under Section 122, hence penal provisions against these two firms are not invoked in this SCN. Further, ITC was appearing in the GSTR-2A of eight firms namely M/s Osis International (06AWRPM0914E1ZM), M/s United International (06FACPK6158L1ZC), M/s Avtar Trading Co. (07BUTPS6855F1ZT), M/s Dinesh Enterprises (07DHOPP9901H1ZT), M/s Pandit Traders (07FOZPP2803G1ZG), M/s S.V. Traders (09BNIPV2084B1ZU), M/s Rajeev Trading Co. (09BSPPG9767A1ZA), M/s Avtar



Trading Co. (09BUTPS6855F1ZP), but neither ITC was availed nor passed on by these firms, hence penal provisions against these firms are not invoked in this SCN.

13. Now therefore, M/s Montage Enterprises Pvt. Ltd., (01AACCM8173H1ZM), Phase-1, Lane No.4, SIDCO Industrial Area, Bari Brahmana, Samba, Jammu and Kashmir, 181133 is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i*. The GST amounting to ₹72,80,70,539/- (IGST ₹69,15,19,785/- + CGST ₹1,82,75,377/- + SGST ₹1,82,75,377/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;
- *ii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i*;
- *iii.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *i*;
- *iv.* Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹72,80,70,539/- (IGST ₹69,15,19,785/- + CGST ₹1,82,75,377/- + SGST ₹1,82,75,377/-);
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹72,80,70,539/- (IGST ₹69,15,19,785/- + CGST ₹1,82,75,377/- + SGST ₹1,82,75,377/-);
- *vi.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*), (*xiv*), (*xvi*), (*xvii*) and (*xx*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.1 Now therefore, M/s Montage Enterprises Pvt. Ltd., (05AACCM8173H1ZE), Plot No.13, Sector-11, IIE SIDCUL, SIDCUL, Haridwar, Uttarakhand, 249403 is hereby



required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i*. The GST amounting to ₹232,03,78,923/- (IGST ₹232,03,78,923/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;
- *ii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i*;
- *iii.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *i*;
- *iv.* Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹232,03,78,923/- (IGST ₹232,03,78,923/-);
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹232,03,78,923/- (IGST ₹232,03,78,923/-);
- *vi.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*), (*xiv*), (*xvi*), (*xvii*) and (*xx*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.2 Now therefore, M/s Montage Enterprises Pvt. Ltd., (09AACCM8173H1Z6), C-20-22, Sector-57, Noida, Gautam Buddha Nagar, U.P., 201301 is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

i. The GST amounting to ₹128,71,80,989/- (IGST ₹94,21,41,565/- + CGST ₹17,25,19,712/- + SGST ₹17,25,19,712/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;



- *ii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i*;
- *iii.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *i*;
- *iv.* Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹128,71,80,989/- (IGST ₹94,21,41,565/- + CGST ₹17,25,19,712/- + SGST ₹17,25,19,712/-);
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹128,71,80,989/- (IGST ₹94,21,41,565/- + CGST ₹17,25,19,712/- + SGST ₹17,25,19,712/-);
- *vi.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*), (*xiv*), (*xvi*), (*xvii*) and (*xx*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.3 Now therefore, M/s Montage Enterprises Pvt. Ltd., (23AACCM8173H1ZG), 29A, Industrial Area, Malanpur, Bhind, Madhya Pradesh, 477117 is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i*. The GST amounting to ₹123,92,71,533/- (IGST ₹99,75,67,739/- + CGST ₹12,08,51,897/- + SGST ₹12,08,51,897/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;
- *ii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i*;
- iii. Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act,



2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. i;

- *iv.* Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹123,92,71,533/- (IGST ₹99,75,67,739/- + CGST ₹12,08,51,897/- + SGST ₹12,08,51,897/-);
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹123,92,71,533/- (IGST ₹99,75,67,739/- + CGST ₹12,08,51,897/-);
- *vi.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*), (*xiv*), (*xvi*), (*xvii*) and (*xx*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.4 Now therefore, M/s Lagrowth Associates Pvt. Ltd., (07AAMCM9016D1ZG), (Formerly known as M/s Montage Sales Pvt. Ltd.), Ground Floor, G-242, Ghazipur Road, Delhi, 110096 and M/s Montage Enterprises Pvt. Ltd., jointly and severally are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i*. The GST amounting to ₹287,69,43,872/- (IGST ₹72,83,87,120/- + CGST ₹107,42,78,376/- + SGST ₹107,42,78,376/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;
- *ii.* The Input Tax Credit of IGST amounting to ₹78,73,87,541/-, availed and utilized in violation of 1st proviso to Section 16(2) of the CGST Act (A recipient fails to pay to the supplier the value of supply along with tax payable thereon within a period of 180 days), should not be disallowed and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with Section 20 of the IGST Act, 2017, as detailed in para 10.5;
- *iii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act,



2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. i & ii;

- *iv.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *i & ii*;
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹287,69,43,872/- (IGST ₹72,83,87,120/- + CGST ₹107,42,78,376/- + SGST ₹107,42,78,376/-);
- vi. Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹287,69,43,872/- (IGST ₹72,83,87,120/- + CGST ₹107,42,78,376/- + SGST ₹107,42,78,376/-);
- *vii.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*), (*xiv*), (*xvi*), (*xvii*) and (*xx*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.5 Now therefore, M/s Neemsar Vyappar Pvt. Ltd., (09AAMCM9015A1ZJ), (Formerly known as M/s Montage Flexipack Sales Pvt Ltd.), Village-Gahru Pargana-Bijnore, Warehouse No.3, Back Portion, Khasra No. 1441, Old No. 1664/1, Daroga Khera, Opp. Bal Bhawan, Lucknow-Kanpur Road, NH-25, Lucknow, 226012 and M/s Montage Enterprises Pvt. Ltd., jointly and severally are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i*. The GST amounting to ₹99,17,95,622/- (IGST ₹9,07,91,192/- + CGST ₹45,05,02,215/- + SGST ₹45,05,02,215/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;
- *ii.* The Input Tax Credit of IGST amounting to ₹1,02,85,769/-, availed and utilized in violation of 1st proviso to Section 16(2) of the CGST Act (A recipient fails to pay to the supplier the value of supply along with tax payable thereon within a period of 180 days), should not be disallowed and recovered under the provision of



Section 74(1) of the CGST Act, 2017 read with Section 20 of the IGST Act, 2017, as detailed in para 10.6;

- *iii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i & ii*;
- *iv.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *I & ii*;
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹99,17,95,622/- (IGST ₹9,07,91,192/- + CGST ₹45,05,02,215/- + SGST ₹45,05,02,215/-);
- *vi.* Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹99,17,95,622/- (IGST ₹9,07,91,192/- + CGST ₹45,05,02,215/- + SGST ₹45,05,02,215/-);
- *vii.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*) and (*xvi*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.6 Now therefore, M/s Pitambara Business Promotions Pvt. Ltd., (23AAMCM9078M1ZP), (Formerly known as M/s Montage Printpack Sales Pvt Ltd.), Ground Floor, A-15, Kailash Nagar, City Center Square, Near Boys Hostel, Gwalior, Madhya Pradesh, 474002 and M/s Montage Enterprises Pvt. Ltd., jointly and severally are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

i. The GST amounting to ₹38,18,63,138/- (IGST ₹10,97,83,326/- + CGST ₹13,60,39,906/- + SGST ₹13,60,39,906/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, as detailed in para 10.4;



- *ii.* The Input Tax Credit of IGST amounting to ₹3,47,44,601/-, availed and utilized in violation of 1st proviso to Section 16(2) of the CGST Act (A recipient fails to pay to the supplier the value of supply along with tax payable thereon within a period of 180 days) should not be disallowed and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with Section 20 of the IGST Act, 2017, as detailed in para 10.7;
- *iii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i & ii*;
- *iv.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, and/or under Section 20 of the IGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *i & ii*;
- v. Penalty should not be imposed upon them in terms of Section 122(1)(*i*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for supplying any goods without issue of any invoice or issues an incorrect or false invoice with regard to any such supply involving GST amounting to ₹38,18,63,138/- (IGST ₹10,97,83,326/- + CGST ₹13,60,39,906/- + SGST ₹13,60,39,906/-);
- vi. Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular ITC amounting to ₹38,18,63,138/- (IGST ₹10,97,83,326/- + CGST ₹13,60,39,906/- + SGST ₹13,60,39,906/-);
- *vii.* Penalty should not be imposed upon them in terms of Section 122(1)(*x*), (*xiv*), (*xvi*), (*xvii*) and (*xx*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.7 Now therefore, Mr. Arvind Gupta, Promoter Director and Mr. Yogeshwar Singh, Director of M/s Montage Enterprises Pvt. Ltd., is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a), (c) & (e) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.



13.8 Now therefore, Mr. Harvinder Singh Matharu, Director and Mr. Jasmeet Singh, Director of M/s Lagrowth Associates Pvt. Ltd. (Formerly known as M/s Montage Sales Pvt. Ltd.) is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a), (c) & (e) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.9 Now therefore, Mr. Nikhil Agnihotri, Director and Mr. Sandeep Jain, Director of M/s Neemsar Vyappar Pvt. Ltd. (Formerly known as M/s Montage Flexipack Sales Pvt Ltd.) is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a), (c) & (e) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

13.10 Now therefore, Mr. Gagandip Singh Bawa, Director and Mr. Sushil Singh, Director of M/s Pitambara Business Promotions Pvt. Ltd. (Formerly known as M/s Montage Printpack Sales Pvt. Ltd.) is hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a), (c) & (e) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

14. Now therefore, M/s Katyayni Enterprises (07AHGPR4479K1ZO), Ground Floor, 10/33, Vishwas Nagar, Patel Gali, Shahdara, Delhi, 110032 are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i*. The GST amounting to ₹7,68,578/- (CGST ₹3,84,289/- + SGST ₹3,84,289/-), should not be demanded and recovered under the provision of Section 74(1) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, as detailed in para 10.8;
- *ii.* Interest under the provision of Section 50(3) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 should not be demanded and recovered from them on the GST amount demanded at Sl.No. *i*;
- *iii.* Penalty should not be imposed upon them in terms of Section 74(1) of CGST Act, 2017 read with Section 122(2)(b) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017, for willful suppression of facts with intent to evade payment of GST on the amount demanded at Sl.No. *i*;



14.1 Now therefore, the following 259 firms/companies through their Proprietors/ Partners/Directors are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why:

- *i.* Penalty should not be imposed upon them in terms of Section 122(1)(*ii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or Section 20 of the IGST Act, 2017 for issuance of tax invoices or bills for passing on irregular Input Tax Credit without supply of underlying goods or services or both as detailed in column (4) of the following table;
- *ii.* Penalty should not be imposed upon them in terms of Section 122(1)(*vii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or Section 20 of the IGST Act, 2017 for taking or utilizing irregular Input Tax Credit without receipt of underlying goods or services or both as detailed in column (3) of the following table;
- *iii.* Penalty should not be imposed upon them in terms of Section 122(1)(x), (*xii*), (*xvi*) and (*xvii*) of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017, for furnishing any false information or return with an intention to evade payment of tax due under this Act; for furnishing any false information with regard to registration particulars, either at the time of applying for registration, or subsequently; for failing to furnish information or documents called for by an officer in accordance with the provisions of this Act or the rules made thereunder or furnishes false information or documents during any proceedings under this Act.

Sl. No.	GSTIN, Trade Name (M/s) & Address of Principal Place of Business	Penalty under Section 122(1)(<i>vii</i>)	Penalty under Section 122(1)(<i>ii</i>)
(1)	(2)	(3)	(4)
1	01BIKPC6617E1ZS Globe Enterprises Kartholi, Dasal, Bari Brahmana, Samba, Jammu and Kasmir, 181133	3,65,50,752	3,66,30,642
2	06BWYPV1916P1ZE Jai Bhawani Traders H. No. 875, Navdeep Colony, Near CR College, Azad Nagar, Hisar, Haryana, 125001	57,51,499	56,88,851
3	06IQSPS7194P1ZA Ganpati Enterprises H. No. FCA 74, Nawlu Colony, Ballabhgarh, Faridabad, Haryana 121004	3,09,18,053	3,12,28,313



	07AAEPK3770F2ZT Shri Mahaveer Ji Sales Corporation		
4	Khasra No. 12/26, Bijapur, Village	3,81,16,266	3,67,85,351
	Budhpur Bijapur, Delhi, 110082		
	07AAGFU2991L1ZL		
	Urban Trade Industries		
	Office No.403, 4th Floor, Metro		
5	Complex, Building No. 4/5, Near Veer	2,10,29,417	2,12,19,770
	Saverkar Market, Nirman Vihar,		
	Delhi, 110092		
	07AAHCB5448H1ZK		
	BPSR Industries Pvt. Ltd.		
6	Shop No11, Plot No2, Pocket-6	11,82,96,950	12,31,35,252
	Malik Buldicon Plaza, Sector-12,		
	Dwarka, Delhi, 110078		
	07AAHCC6179Q1ZU		
	Catania Enterprises Pvt. Ltd.		
7	A-10/5, Ground Floor, Jhilmil	21,39,73,437	25,37,59,548
	Industrial Area, Near Tata Motors,		
	Shahdara, Delhi-110095		
	07AAHCG0818Q2Z7		
	Gwalior Enterprises Pvt. Ltd.		
8	Space No216, Plot No19, Radha	21,01,06,841	28,05,45,021
	Chamber, G-Block Community		
	Centre, Vikas Puri, Delhi-110018		
	07AAHCG0827H1ZQ		
	Ghaziabad Enterprises Pvt. Ltd.		
9	302, 3 rd Floor, Pankaj Tower,	14,05,62,752	14,04,67,136
	Commercial Centre, Vikas Puri, Delhi,		
	110018		
	07AAIFE1973E1ZI		
	Elfed Industries		
10	Office No. 102, 1st Floor, Plot No. E-	94,63,665	95,01,090
	22, Jawahar Park, Laxmi Nagar,		
	Delhi, 110092		
	07AAIFL7295E1Z0 Life Wellness		
11	Plot No. 131, Ground Floor, Pkt-H,	0 10 60 574	0.15.05.595
11	Sector-1, Bawana, DSIDC City,	2,13,63,574	2,15,35,585
	Bawana, Delhi, 110039		
	07AALCM8399L1ZG		
	Mantova Enterprises Pvt. Ltd.		
12	UG-17, Tower No. 4, Vishwa Deep,	4,10,61,070	2 10 55 050
14	District Centre, Janak Puri, Delhi-	4,10,01,070	3,10,55,959
	110058		
	07AAMCA0840R1Z9		
	Arranger Tradelinks (India) Pvt. Ltd.		
13	404, 4th Floor, Madhuban Building,	11,34,62,076	4,32,29,377
	Nehru Place, Delhi, 110019		
L	inemia Flace, Denni, 110019		Page 191 of 230



14	07AAOPG0924D1Z2 Avi Foil Traders H. No. 474, Ground Floor, Kh No. 105/78, Village and Post Khera Kalan, Near Shiv Mandir, Delhi, 110082	80,62,354	80,90,181
15	07AATFG8021G1Z8 Global Trading Co Shop In, H. No-150, Badami Business Centre, Kilokari, Delhi, 110014	8,02,29,188	7,26,91,477
16	07AAUPQ6586B3Z2 Swastik Enterprises H. No4, 3rd, Ph-I, Community Centre, Naraina Industrial Area, Delhi, 110028	1,07,13,146	84,361
17	07ABAFR7758R1Z9 Radical Corporation Office No, 403, 4th Floor, Building No. 4/5, Veer Saverkar Market, Nirman Vihar, Delhi, 92	2,30,69,106	2,32,46,278
18	07ACTPI0807Q1Z2 Surya Enterprises Off. No. TC/607, Near Pacific Mall, C.H.S Road, Transit Camp, Raghubir Nagar, Delhi, 110027	89,93,384	-
19	07ADGPT2590M2ZX Proview Traders 27/4, Ground Floor, Plot No27, Main G.T Road, Dilshad Garden Industrial Area, Delhi, 110095	20,73,86,803	20,85,33,674
20	07ADNPB7822K1ZC P B Associates 1/6485, East Rohtash Nagar, Shahdara, Delhi, 110032	13,39,88,338	13,12,98,235
21	07AEAFS4741N1ZP S.G. Enterprises Shop No. 4, Kh No59, Saket, South Delhi, Delhi, 110030	1,64,69,604	59,72,735
22	07AFUPJ0552P1ZU Mahalaxmi Enterprises Plot No. J-108, Mohan Garden, Uttam Nagar, Near R.P. Property, New Delhi, 110059	4,52,73,392	1,95,77,643
23	07AHKPH3924R1ZS Aavesh Enterprises Off. No 123/A, Near Singh General Store, Ravi Nagar Road, DDA Colony, Chaukhandi, Vishnu Garden, Delhi, 110018	1,19,16,422	-



	07AILPC7741F1ZB		
	Gravity Enterprises		
24	1347/B-1, Upper Ground Floor, Gali	6,96,17,460	
~4	No. 13, Govindpuri, Kalkaji, Delhi,	0,90,1/,400	-
	110019 07AKLPJ5035D1ZD		
	Blue Star		
25		14,42,972	22,12,268
	F-24, Vardhman Select Mall, Block-I,		
	Narela Industrial Area, Delhi, 110040		
	07ALGPU1224R2ZK		
	Aggarwal Traders		
26	Plot No. 14/12, Nala Road, MCD	1,92,29,138	1,04,89,103
	Office, Okhla Industrial Area, Delhi,		
	110020		
	07ALMPU0109M1ZR		
	S S Traders		_
27	Shop No 1, Plot No 13, Tilak Enclave	17,10,216	1,33,95,879
	Part-2, Mohan Garden, Uttam Nagar		
	Play Factory, Delhi, 110059		
	07AMRPJ1732H1ZZ		
	Nirbhay Trading Co.		
28	H. No413/4, Ground Floor, Gazipur	2,09,25,759	84,04,692
	Near School Lane, Gazipur, Delhi,		
	110092		
	07ANCPY3290M1ZD		
29	Yadav Enterprises	74,40,878	_
	H.No 183, 1st Floor, Naraina,	/ +,+0,0/0	
	Opposite PNB Bank, Delhi, 110028		
	07ANUPH4951N1Z8		
30	Mehul Enterprises	1,48,09,433	1,52,16,534
J	H.No255, JJ Colony, Madanpur	-,-0,0,0,0,00	1,52,10,554
	Khadar, Delhi, 110076		
	07ANYPR8387E1ZZ		
31	S. V. Enterprises	72,18,648	71,39,436
J	62, 2nd Floor, Pocket-11, Sector-24,	/=,10,040	/ +,07,+00
	Rohini, Delhi, 110085		
	07AOCPK8764K1ZG		
32	Kumar Enterprises	3,42,41,238	1,05,47,928
	G-182, 2nd Floor, Sector-2, Bawana,	J, 7 ~, 7 1,2JU	1,00,4/,920
	Delhi, 110039		
	07AOKPK9451R2ZZ		
	Jajoria Enterprise		
33	H. No. 16/569-I, Gali No. 18, Arya	1,46,62,614	1,17,67,308
	Samaj Road, Bapa Nagar, Karol Bagh,		
	Delhi, 110005		
	07APVPC5712R1Z7		
94	Genius Enterprises	17 70 80 506	
34	D-323A, Balaji Complex, Gali No11,	17,73,83,526	-
	Laxmi Nagar, Delhi, 110092		
	rate Converse of Coods and Somiscas Tax Intelligence Mean		Doge 103 of 230



	07AQOPH9721P1Z2		
	Arya Trading		
35	Shop No. 33, Andrews Ganj, Delhi,	62,45,158	-
	110049		
	07ASCPL1721F1Z7		
	Sanjay Trading Co		
36	H.No117, Ground Floor, Block-C,	10,89,08,062	6,91,40,845
	Gali No-2, Nangali Vihar Extn,	, , ,	
	Najafgarh, Delhi, 110043		
	07ASCPN4947P1Z2		
	Neelima Enterprises		
37	B-158, Sadatpur, ST No. 2, Karawal	44,30,109	1,46,50,002
	Nagar, Shahdara, Delhi, 110094		
	07ASQPR5114G1ZI		
38	P.R. Traders	6,54,67,476	7,76,16,792
	Kh No. 125, Hamidpur, Delhi, 110036		
	07ATWPM4771H1Z0		
	Galaxy Impex		
39	A-45, Block-A, Wazirpur Industrial	77,86,190	77,44,796
	Area, Wazirpur, Delhi, 110052		
	07AUKPD2924N1ZF		
	Sunil S Traders		
10	136-B, Near Shiv Shakti Mandir,	1 07 94 100	
40	Janta Flat, National Market School	1,27,84,100	-
	Road, Ekta Enclave, Peera Garhi,		
	Delhi, 110041		
	07AUOPK8454G1Z6		
41	Image India	70,44,306	96,32,967
-	A-23, Prem Nagar-II, Kirari Suleman	/ • / 1 //00 • •	J=,U=,J=/
	Nagar, Delhi, 110086		
	07AWUPA7355A2ZJ		
	M.R. Enterprises		
42	Plot No 5-1/133, C-Block, Kh-40/23,	11,84,67,683	8,65,27,797
	Gali No. 5, Bir Bazar Road, Baprola		
	Vihar, Nangloi, Delhi, 110043		
	07AXHPK0562F1ZO		
	Gupta Enterprises		
43	B-7, Ground Floor, Dharam Colony	8,08,83,448	5,70,25,850
	Taneja Complex, Khasra No 33/20,		
	21/1, Nangloi, Delhi, 110041 07AXUPV6358F1ZM		
	Sky International		
44	Shop No4, Kh No59, Saket, Delhi,	3,87,52,704	3,61,88,312
	110030 07AYCPT3547R2ZL		
	Tyagi Traders		
45	H. No. SRS-173, 1 st Floor, Naraina,	70,37,940	-
	Delhi, 110028		
L	Domi, 110020		



	07AYQPT5265L2ZG		
46	ST Traders	2,28,92,644	-
•	H.No19, Block-A, Phase-I, Naraina	, ,, ,, ,, ,,	
	Industrial Area, Delhi, 110028		
	07AZCPN6735E1ZD		
47	Nafeesh Trading Co.	2,28,95,312	2,29,13,394
4/	H. No150, Badami Business Centre,	2,20,90,012	2,29,10,094
	Kilokari, Delhi, 110014		
	07AZVPR2782C1ZV		
40	Das Enterprises		41 66 = 49
48	H. No. SRS-73, 1 st Floor, National	2,08,81,592	41,66,548
	Market, Naraina, Delhi, 110028		
	07BBVPH7773J1ZT		
49	Vishal Enterprises	1,29,64,204	1,31,40,495
	3, D-280, Saket Place, Delhi, 110017	, , , , , , ,	
	07BDIPJ1111P1ZK		
	Sun Trading Company		
	111 Old 7L New No 48, Ground Floor,		
50	Kh No 22/13 Surat Singh Enclave,	4,49,08,197	3,09,79,197
	Block Y, Adarsh Enclave Prem Nagar,		
	New Delhi-110041		
	07BDNPS7160Q1ZJ		
	Ajay Trading Co		
=1	Plot 17/42 And 17/43, Ground Floor,	6,47,92,658	3,74,65,829
51	Block-D, JJ Colony, Shahabad Dairy	0,4/,92,050	3,/4,05,029
	Near Roop Krishna, Delhi, 110042		
	07BDPPD1016E1Z2		
	Renu Enterprises		
=0	W-137, Ground Floor, Naraina	65,61,892	
52	Industrial Area, Naraina Phase-1,	05,01,092	-
	Delhi, 110028		
	07BDSPK7832A1ZG Ridhi Traders		
53	Plot No. 221, Kh No. 57/6/2, Ground	3,74,13,464	3,70,63,145
	Floor, Gram Sabha Lal Dora Village,		
	Prahaladpur Bangar, Delhi, 110042		
	07BDSPK7832A2ZF		
54	Ragni Enterprises	1,40,74,394	92,39,344
	B-72, Yadav Park, Nangloi, Delhi,		
	110041		
	07BETPY0156F2Z1		
55	Kapur Enterprises	1,26,78,872	78,35,926
	Kh. No. 15/14, 1 st Floor, MCD Office,		, ,00,,
	Qutub Road, Delhi, 110055		
	07BFHPP9940K1ZS		
56	Unique Traders	5,21,20,252	4,79,18,150
	Plot No2, Kh. No. 42/2-P No290,	0,-1,-0,-02	7,7 7,10,10
	Village Nangloi, Delhi-110041		



	07BFHPP9940K2ZR		
57	Esprit Enterprises	3,31,25,319	2,60,77,302
3/	Plot No171/1, Ground Floor, Block-	5,51,25,519	2,00,//,302
	WZ, Shakurpur, Delhi, 110034		
	07BFKPG9015D1ZN		
	Acrosys Tech		
58	G-82, Sector-2, Bawana Industrial	4,17,12,783	2,88,46,938
	Area, Bawana, Delhi, 110039		
	07BGRPS1887H1ZM		
	Mayo Enterprises		
	Shop at Plot No48, Ground Floor,		
59		3,49,61,940	3,41,48,536
	Near Radha Krishan Dharam Kata,		
	Gurudwara Road Gali No13		
	Siraspur, Delhi-110042		
	07BGRPS1887H2ZL		
60	Virgo Enterprises	2,86,35,046	-
	H. No. 10, Ground Floor, Extn-2-C,	_,00,33,040	
	Nangloi, Delhi, 110041		
	07BIWPR8811F1ZN		
	Azad Trading		
61	988A, Shop No. 1, Sir Chhotu Ram	3,60,22,624	3,05,44,000
	Marg, Raj Nagar, II, Palam Colony,		
	Delhi, 110077		
	07BJOPH4621J1Z2		
	Hari Sales Corporation		
62	97840/23, MCD Office, Shakarpur,	1,45,78,608	-
	Delhi, 110028		
	07BJRPN7668C1ZN		
	P.C. Supplier Co.		
63	Unit-206, Second Floor, Plot No-3,	2 72 20 072	1 76 42 066
03	Dwarka Sec-12, Pocket-6, New Delhi,	2,73,29,973	1,76,42,966
	110075		
	07BJVPK8809G1ZL		
	Winjet Industries		
64	H. No96, Ground Floor, Gali No05,	4,45,25,176	2,08,73,825
	Block, E-5, Near Metro Shastri Nagar,		
	Shastri Nagar, Delhi, 110052		
	07BLFPJ4916H1Z4		
	D K Trading Company		
65	G/F, New 96 Kh No 21/13/2, Laxmi	7,31,00,636	5,50,57,691
	Vihar, Prem Nagar Ph 3, Delhi,		
	110086		
	07BLVPP6162R1ZV		
	Subrat Trading Company	0 (1,57,94,606
66	Plot No. 489, Ground Floor, Shahbad,	7,45,78,634	
	Daulatpur, Delhi, 110042		
	07BLZPT9351G1Z5		
67	Tiwari Trading Company	2,98,29,246	2,06,65,511
L			



	Out of Kh. No. 12/26, Village,		
	Budhpur, Bijapur, Delhi, 110036		
68	07BMVPB3838H1ZR Ganpati Enterprises B-1174, Ground Floor, Gharoli, Mayur Vihar Phase III, Delhi, 110096	4,01,93,361	3,20,29,854
69	07BNJPR5077B1ZU Rai Enterprises G/F, Taneja Complex, Pvt NoB-7, B- 8, Kh No33/20, 21/1, Taneja Complex, Dharam Colony, Nangloi, Delhi, 110041	8,03,37,439	4,78,15,483
70	07BNOPG2623R1ZH Vikas Trading Company 21/10, 11/1, 11/3, 12/1, 12/3, C-132, Gali No. 6, Main Road, Harit Vihar, Burari, Delhi, 110084	5,96,55,006	5,90,62,862
71	07BPNPN0572H1ZO R.N Trading Co H.No10, Harphool Vihar, Baprola, Nangloi, Delhi, 110041	1,48,14,411	1,35,27,339
72	07BRCPJ0056P1ZN Om Trading Company A-35, Ground Floor, Jhilmil Industrial Area, Jhilmil, Delhi, 110095	7,89,79,141	6,98,92,594
73	07BRDPR1489K1Z9 Raghav Traders H. No. 183, 1 st Floor, Naraina, Delhi, 110028	65,35,294	-
74	07BSTPS8497K2ZB Singhania Enterprises C-2/39, New Kondli, Mayur Vihar Phase-III, Delhi, 110096	3,10,99,373	3,72,42,619
75	07BTTPK2984C1ZB Barfani Traders Flat No. 70, 1 st Floor, Near Laxmi Narayan Mandir, Guru Hari Kishan Nagar, Paschim Vihar, Delhi, 110041	1,19,17,650	-
76	07BULPK5077P1ZS Mahalaxmi Fabrics 18, East Azad Nagar, Delhi, 110051	2,90,16,312	2,21,65,806
77	07BUXPP4783K1ZI Pal Trading Co. LG8 D-211/104, Munirka, New Delhi- 110021	4,38,82,924	1,57,22,862
78	07BUXPR3104A1ZO Rajesh Packaging Materials 988A, Shop No. 2, Sir Chhotu Ram	6,63,47,390	4,98,02,975
	rate General of Goods and Services Tax Intelligence. Me		Page 197 of 230



	Marg, Raj Nagar, II, Palam Colony,		
	Delhi, 110077		
	07BVSPC0480N1Z6		
	Choudhari Traders		
	Off. No.36/A, Near Sunil Medicos,		
79	Najafgarh Dhansa Road, K, Block,	82,86,334	-
	Gopal Nagar, Najafgarh, Delhi,		
	110043		
	07BXAPA6529A1Z3		
80	Aripha Trading Co.	4,34,33,093	4,83,47,357
	H.No. 128, Ground Floor, B/1, Shop		
	No.4, Kilokari, Delhi-110014		
	07BXQPN0974E1Z5		
81	Pitambar Packaging	7,73,63,097	1,74,95,132
	Shop in Plot No.13/3, Ground Floor,		,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	Back Side, Kapashera, Delhi, 110037		
	07BYLPB0493C1ZQ		
~	Pramod Traders		
82	Plot No. 223, Kh. No. 958, 1 st Floor,	3,11,69,316	1,48,82,872
	Block-C, Village Siraspur, Raja Vihar,		
	Delhi, 110042		
	07BYPPB4545K1Z4		
	Adheera Traders		
83	Plot No.23-G, Ground Floor, Shop	1,40,43,480	-
	No. 10/1, Dharam Colony, Nangloi,		
	Delhi, 110041		
	07BYUPA7776E1ZY		
-	Maruti Trading Company		_
84	H. No. RZ-77, First Floor, Maruti	4,82,89,840	2,25,97,464
	Trading Company, Uttam Nagar,		
	Delhi, 110059		
	07BYXPK7566D2ZQ		
	Unique Traders		
85	A-228, Landmark Na Shaheed	54,56,888	-
	Sukhdev Nagar, Wazirpur Industrial		
	Area, Delhi, 110052		
	07BZNPJ1724R1ZR		
86	Swastik Enterprises	77,39,944	61,49,780
	A-45, Block-A, Wazirpur Industrial	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	- / 1///
	Area, Wazirpur, Delhi, 110052		
	07CAUPR4187F1Z0		
-	Alston Traders		
8 7	Front Portion G/F, Kh. No. 122,	2,37,67,203	2,40,87,581
	Savita Vihar Radha Vihar Ph-2, Gali		
	No2, Mukandpur, Delhi, 110084		
	07CBGPT7205K1ZA		
88	Tradezone Enterprises	81 82 121	15,57,718
õð	A-55-56, L/G/F, Madhu Vihar Market	84,82,424	13,3/,/10
	Main Road, Delhi, 110092		
	rate Ceneral of Coods and Services Tax Intelligence Mee		Page 198 of 230



		1	
89	07CBHPR7202R1Z0 Sameer Trading Company H. No. B-278-A, Ground Floor Shop,	3,46,78,660	1,50,465
	Tigri Extension, New Delhi, 110019		
	07CDCPK2241L2ZM		
00	H K Enterprises	4 60 10 508	_
90	A-188, Naraina Industrial Area,	4,60,19,598	-
	Phase-I, Delhi, 110028		
	07CEXPV6488L1Z0		
91	Shayam Impex	2,05,46,774	1,87,58,548
91	1824/2, Main Rajouri Garden, Delhi,	2,03,40,774	1,0/,00,040
	110027		
	07CFAPT7827M1ZS		
92	Jai Bhawani Traders	-	42,38,665
-	A-563, Naraina Industrial Area, Delhi,		
	110028		
	07CGJPD1778B1ZM		
	Mehul Enterprises		
93	70/60, Ground Floor, Near Ice	1,42,90,657	45,92,750
	Factory, Mangolpur Kalan, Delhi, 110085		
	07CGLPN7896N3Z4		
	Niraj Enterprises		
94	ZC/281, Near MCD Office, Naraina,	4,04,94,742	-
	Delhi, 110028		
	07CICPC2115G1ZY		
	Durga Enterprises		
95	C-209, Ramadhar, Naraina Industrial	41,20,462	-
	Area Phase-1, Naraina, Delhi, 110028		
	07CINPP9472Q1ZZ		
	Harish Traders		
96	Unit-No. 305, 3 rd Floor, Plot No. 4,	4,60,96,700	95,22,976
	Sector-G, Mamrams Premium Tower,		
	Kondli Gharoli, Delhi, 110096		
	07CJUPM2255G1ZV		
	Vicky Trading Co		
97	26-D, Ground Floor, Block-D, Pvt.	5,03,35,503	6,03,97,809
	Shop No.8, Pandav Nagar, Delhi,		
	110092		
	07CLBPM0865R2ZI		
-	Maurya Enterprises	_	
98	Unit No305, 3 rd Floor, Plot No. 4,	8,05,17,779	7,04,66,562
	Sector-G, Kondili Garoli, Delhi,		
	110096		
	07CLMPP0929C1Z3		
99	Satyanarayan Traders	3,16,68,966	2,82,33,833
"	RZF, 954-C, Raj Nagar, Part-II, Palam		
	Colony, Delhi, 110077		



	07COQPP0478H1ZF		
	Gokul Enterprises		
100	H-83, Vijay Vihar, Phase-II, Rohini,	3,00,76,526	2,20,88,735
	Delhi, 110085		
	07CUMPP6915P1ZO		
	Ganapati Enterprises		
101	C-34, Ground Floor, Kh. No. 12/13,	79,90,210	77,81,018
	Aman Puri, Nangloi, Delhi, 110041		
	07DBFPK8046H1ZH		
	Ram Enterprises		
102	C-2/39, Ground Floor, New Kondli,	72,53,278	71,10,910
	Mayur Vihar Phase-3, Delhi, 110096		
	07DBLPK9034D2ZK		
	Gyan Traders		
103	302, Pankaj Tower, Vikas Puri,	2,59,05,511	-
	Delhi, 110018		
	07DDTPK9495L2ZA		
	Kavita Industries		
104	MB-42/2, 2 nd Floor, Plot No. 12,	3,17,34,228	2,93,54,551
	Master Block, Gali No. 2, Shakarpur,	5,-/,5-,	-,,0,0+,00-
	Delhi, 110092		
	07DFRPM5804P1ZM		
	A M Enterprises		
105	H. No. 1954, Ground Floor, Near	1,99,16,008	-
	Mohan Das, Narela Village Pana	1221 -1	
	Mamaupur, Delhi, 110040		
	07DFZPG1472M1ZQ		
	Gupta Traders		
106	Off No. 129-B, Near Roshan Garden,	40,51,476	-
	Shivaji Road, Masudabad Najafgarh,		
	Delhi, 110043		
	07DHRPR6682G1ZI		
107	Mahaveer Industries	35,32,546	31,38,747
	AG 88-D, Vikashpuri, Delhi, 110018		
	07DIOPP3069P1ZA		
108	Sitakant Trading Co.	4 70 00 075	10 54 050
100	A-61, Jain Park, Gali No5, Uttam	4,79,90,975	10,54,972
	Nagar, Delhi, 110059		
	07DLXPG8767F1ZA		
	Gita Enterprises		
109	H. No. SRS/73, 1 st Floor, National	1,19,34,598	-
	Market, Naraina Opp. PNB Bank,		
	Delhi, 110028		
	07DOOPA4777P2Z3		
110	Gupta Enterprises	2,16,13,664	69,32,192
	148/151, Ground Floor, Ram Nagar,	2,10,13,004	09,32,192
	Qutub Road, Delhi, 110055		
111	07DOOPG0973R1Z4	1,48,71,506	-
	Gupta Enterprises		
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	F-29590/2, Ground Floor, Balbir		
	Nagar, Delhi, 110028		
	07DOPPR4508E1ZO		
	Subham Warpers		
112	Plot No. 92, Front Side, 1 st Floor,	8,54,14,649	3,42,97,366
112	Shamshan Ghat Road, Bijwasan,	0,34,14,049	3,42,9/,300
	Delhi, 110061		
	07DRBPK8521B2Z3		
	Kumar Enterprises		
113	H.No. 4, 3 rd Floor, Ph-I, Community	1,13,00,864	-
	Centre, Naraina Industrial Area,		
	Delhi, 110028		
	07DRXPK8539K1ZP		
111	Golf Traders	22,71,09,893	
114	Shop No. 33, Andrews Ganj, Delhi,	22,/1,09,893	-
	110049		
	07DSUPA3132C1Z2		
	Universal Traders		
	Khasra No 761, Ground Floor,		0
115	Landmark Khreah Road, Near	2,40,12,786	2,42,15,182
	Hanuman Mandir, Village Siraspur,		
	Delhi, 110042		
	07DVRPK7541H1Z2		
	Jagdamba Enterprises		
116	265, Ground Floor, Pratap Khand,	1,24,52,936	1 00 70 515
110	Vishwakarma Nagar, Jhilmil Colony,	1,24,52,930	1,23,72,515
	Delhi, 110095		
	07DXHPS1755R1ZJ		
	Singh Enterprises		
117	0	44,75,728	-
	H.No126, Block-C, Ph-I, Naraina		
	Industrial Area, Delhi, 110028		
	07EATPK4367M1ZT		
118	MK Enterprises	1,79,63,141	-
	B-135, Mohan Garden, Hastal Road,	-,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	Uttam Nagar, Delhi, 110059		
	07EFEPK0237Q1Z5		
119	Kumar Enterprises	2,44,01,415	1,46,42,151
119	Shop. No. One, Ground Floor, Rani	2,44,01,413	1,40,42,131
	Garden, Shastri Nagar, Delhi, 110031		
	07EFTPR2472K1ZM		
100	Rajkishore Trading		
120	Shop No. 5, VPO Shahbad, Daulatpur,	7,74,90,996	3,59,35,532
	Delhi, 110042		
	07EFZPS6397G1Z8		
	Sharma Enterprises		
121	3 rd 08Floor, 341 A/95, Gali, No, 13,	16,85,770	12,91,244
	Shalimar Park Extension, Bholanath	0,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,)-,- , -
	Nagar, Shahdara, Delhi, 110032		
	110511, 51101100110, Dellin, 110052		



	07EHSPP9216E1ZU		
	Pradhan Trading Co		
122	Shop No.3, Ground Floor, Shri	3,04,83,958	1,89,71,681
	Parasnath Jain Complex, 10/1 and	0,01,00,000	_,_ ,,, _, _,
	10/2, Khasra No. 33/19, Dharam		
	Colony, Nangloi, Delhi, 110041		
	07EKFPS8144Q1Z7		
	BSA Industries		
123	188, GF City Paper Fie, Industrial	3,23,16,246	1,16,98,857
	Area, Patparpar Ganj, Near		
	Showroom Honda, Delhi, 110092		
	07EUIPP4391D1ZD		
	Shiv Shakti Enterprises		
10.4	Plot No. 223 Kh. No. 958, Ground	1 00 04 101	6 00 494
124	Floor, Landmark Near Shiv Mandir,	1,39,34,131	6,32,484
	Block-C Raja Vihar, Village Siraspur,		
	Delhi, 110042		
	07EULPS3748N1ZN		
	Rajasthan Udyog		
125	Ground Floor, H.No404 New 140,	2,44,98,406	2,43,84,403
	Street No 15, Village Jagatpur, Near		
	Kartar Vatika, Delhi, 110084		
	07EUXPK1745P1ZM		
	JK Trading Co.		
126	P-14, Ground Floor, Vijay Vihar,	2,97,95,276	33,543
	Uttam Nagar, Delhi, 110059		
	07EWAPS6954P1ZK		
	Jyoti Traders		
127	A-175, Naraina Industrial Area,	4,13,64,308	-
	Phase-1, Naraina, Delhi, 110028		
	07EWAPS6954P3ZI		
	Soham Marketing		
128	H. No126, Block, C, Naraina Ph-1,	1,28,51,292	-
	Naraina, Delhi, 110028		
	07EXWPS6748Q1ZU		
	Concept		
129	Khasra No. 13/6/1, Gali No.5, Opp	2,25,22,532	2,27,43,219
129	Radha Krishna Mandir, Village Jagat	2,20,22,002	2,2/,43,219
	Pur Delhi, Delhi, 110084		
	07EYTPR0862L1ZJ		
	Starnx Enterprises		
190	X/437, 1 st Floor, Mohalla Ram Nagar,	1 10 59 471	
130	Gali o, Mohalla Ram Nagar, Delhi,	1,19,53,471	-
	110031		
	07EZRPM5505G1Z1		
131	Mau Traders	1,31,82,507	70,85,925
-0-	1402 G1, Gali No.13, Govind Puri,		
	Delhi, 110019		



	OFFEDDSF009C171		
	07FERPS7038C1Z1 A S Sales		
132		95,61,805	31,78,749
	Kh No188, Ground Floor, Khatoni		
	No-26, Dallu Pura, Delhi, 110096		
	07FEZPS1061B1Z8		
	Surya Enterprises		
133	D 7/3, F-Block, Pocket X, Okhla Phase	5,41,59,324	5,56,94,794
	II, Okhla Industrial Area, Delhi,		
	110020		
	07FFZPS9040K3ZA		
134	Shree Jee Traders	51,99,310	6,64,243
-04	Shop at 121, Beena Enclave, Nangloi,	0-,77,0	
	Delhi, 110041		
	07FIFPK1036L1Z7		
135	KC Laminates	3,70,91,888	32,024
-00	E-1/407, Shivram Park, Nangloi,	3,7 0,7 1,000	5-,
	Delhi, 110041		
	07FIQPK9390J1ZB		
136	Mahadev Enterprises	28,16,902	28,17,947
130	C-11, Block-C, Loni Road, Jyoti Nagar,	20,10,902	20,1/,94/
	Shahdara, Delhi, 110094		
	07FRMPR1240D1ZU		
137	Pandit Traders	_	47,70,056
13/	E-368, Naraina Industrial Area,	_	4/,/0,030
	Delhi, 110028		
	07FUHPS8719A2ZB		
138	Iconic International	25,37,24,488	20,89,71,675
130	1425/X, Janta Gali, Gandhi Nagar,	25,3/,24,400	20,09,/1,0/5
	Delhi, 110031		
	07FUMPM7409E1ZC		
139	Shine International	4,51,18,293	3,53,49,821
139	180 E-2, Street No. 0, Bhola Nath	4,01,10,290	3,53,49,021
	Nagar, Shahdara, Delhi, 110032		
	07FUWPS2084H1ZT		
140	Ashoka Industry	2,77,60,910	2,10,47,675
140	Plot No. 22, Pole No. 44, Sita Puri	2,//,00,910	2,10,4/,0/5
	Dabri Palam, Delhi, 110045		
	07FXVPM4565H1ZO		
141	Vishnu Traders	97,77,632	07 07 000
141	B-83, New-165, Rd No. 7, Andrews	9/,//,032	97,97,223
	Ganj, Delhi, 110049		
	07GLDPS5476Q1Z0		
	S.S. Trading Co.		
142	H.No2, Ambedkar Palace, A-1	14,83,87,852	11,19,58,853
	Baprolla Vihar, Nangloi, Delhi,		
	110041		
	07GPTPP4897E1ZX		
143	J P Enterprises	2,26,81,882	2,00,04,794
	230/5-B, Ground Floor, Railway		
Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit Page 203 of 2			



	Colony, Mandawali Fazalpur, Delhi,		
	110092		
	07GWEPK9683R1ZA		
	Lalit Enterprises		
144	H. No. 265, Pocket-12, Vijay Vihar,	1,89,01,184	
144	Bhagwan Vishwakarma Marg, Park,	1,09,01,104	59,05,747
	Sector 5, Rohini, Delhi, 110085		
	07HDEPD4213G1ZY		
	Singh International		
145	34038/235, Shiv Market, Janakpuri,	1,41,57,038	-
	Delhi, 110028		
	·		
	07HDSPK6418J1ZV Krishna Traders		
146	Shop No. G-3, Plot No. 4, Gupta	2,27,26,893	1,34,03,954
	Arcade LSC, Shrestha Vihar Near Dav		
	Public School, Delhi, 110092		
	07HGSPK6058R1Z5		
	Kailash Enterprises	o 1(oc-	
147	H. No 76, Shop No1, Abchal Nagar,	3,16,55,227	6,89,270
	Nilothi Chander Vihar, Nangloi,		
	Delhi, 110041		
	07HINPK9189N1ZZ		
	Seaborne Creations		
148	30/62, Main 100 Foot Road, Gali No.	2,00,21,646	1,82,13,990
	8, Vishwas Nagar, Shahdara, Delhi,		
	110032		
	07HJCPD2205L1ZG		
	Shiv International		
149	B-310, 3 rd Floor, Rectangle One D3,	48,36,283	2,08,04,109
	PVR Select City Walk, Saket, Delhi,		
	110017 07HJJPS0550Q1ZG		
	Prasad Enterprises		
150	H. No.8-A, Chanchal Park, Gurdayal	6,73,80,455	3,99,64,483
	Vihar, Nangloi, Delhi, 110041		
	07HKJPS1195G1ZO		
	Shree Shyam Trading Company		
151	H. No. 5, Gali No. 1, Ground Floor,	8,59,43,708	8,80,88,006
121	Khasra No. 235, Mukandpur Extn.,	0,59,43,700	0,00,00,000
	Delhi, 110042		
	07HWVPS6195C1ZM		
	Suraj Enterprises		
152	H.No10, Harphool Vihar, Baprolla,	20,86,44,990	15,46,95,821
	Nangloi, Delhi, 110041		
	07ICLPK7543H1Z4		
	Shree Ji Enterprises		
153	Ground Floor, C-120, Okla Vihar,	1,33,24,124	1,33,29,273
	Jamia Nagar, Delhi, 110025		
	Janna Nagai, Denni, 110025		



	07IKIPS8885M3ZQ		
	G.S. Trading		
1=4	Unit 2016, 2 nd Floor, Plot No-3,	11 00 00 000	
154		11,33,02,888	4,61,45,800
	Dwarka Sector-12, Pocket-6, Delhi,		
	110075		
	07IQCPS2541L4ZC		
155	Gee Key Sales	1,03,97,582	-
	H. No. 126, Block-C, Ph-I, Naraina		
	Industrial Area, Delhi, 110028		
	07IUPPK3177P1ZK		
	Rudra Enterprises		
156	Plot No. H 1, Shop No. 103, Garg	5,87,01,368	69,07,038
	Tower Neta Ji Subhash Place,		
	Pitampura, Delhi, 110034		
	07IVWPK9323M1ZH		
157	Ravi Kumar Laminates	3,22,65,426	1,72,24,500
-0/	Kh-398, Ground Floor, Shahbad,	5,==,05,==0	-,, -,,,000
	Daulatpur, Delhi, 110042		
	07IWOPS8094E1ZM		
	Empire Traders		
158	H.No168, Ground Floor, Plot No3,	21,13,380	18,90,823
	Kh. No. 37/16, Saboli Road Sanjay		
	Colony, Narela, Delhi, 110040		
	07JECPK2475G1ZD		
	Vikas Traders		
159	Off No. 11, Near GST Support Center,	46,55,014	-
	Sarakpur Road, Prem Nagar, Delhi,		
	110043		
	07JKVPS7810G1ZC		
	K.N. Traders		
160	, 3,	1,60,38,298	-
	Market Naraina, Opposite PNB Bank,		
	Naraina, Delhi, 110028		
	07JVRPK7522Q1ZG		
161	Shiv Sales	3,06,68,119	2,88,93,956
101	9/3638, Ground Floor, Shanti	3,00,00,119	2,00,93,950
	Mohalla, Gandhi Nagar, Delhi, 110031		
	07KLOPS9373D1Z8		
162	Phonix Traders	6,28,90,348	A 15 05 010
102	WZ-48, Shakurpur Village, Opposite	0,20,90,340	4,15,25,012
	M-Block, DDA Market, Delhi, 110034		
	07KUSPK7859B1ZV		
163	Jay Trading Co.	1,52,16,742	_
103	FT-2909/20, 20 Feeta Road, Seelam	1,52,10,/42	-
	Pur, Delhi, 110028		
	07KXYPK9568J1Z0		
164	Satyam Enterprises	2,17,72,620	2,30,90,116
	H. No. A69-A, 2 nd Floor, South		



	Ganesh Nagar, Gali No. 4 Near Gupta		
	General Store, Delhi, 110092		
	07LEGPK5418H1Z8		
	Singh Enterprises		
165	G-14/5, Shop No. 18, Subhas Nagar,	3,43,10,194	2,41,48,061
	Delhi, 110027		
	07LEGPK5425N1ZW		
	Micro Traders		
166	Gali No. 15/12, MCD Office, Rajouri	1,47,53,412	5,22,736
	Garden, Delhi, 110027		
	07LLYPS5428N1ZO		
167	Kumar Trading Company	5,89,59,582	11,64,222
	H. No. A-37, Shiv Bucks Park, Nagloi,		
	Delhi, 110041		
	07LVWPS1348M1ZD		
168	Shivanju Traders	4,09,52,720	3,69,96,340
	A-3/3, 1 st Floor, Paschim Vihar, Near	1/- 2/0 // -	0/- 7/7-701-
	B-2 Blk, DDA Market, Delhi, 110063		
	07NDAPS2698L1ZL		
	Singh Traders		-
169		78,70,638	
	Mandir, Bijwasan Rd, Mahipalpur,		
	Delhi, 110037		
	07OHZPS8032L1ZZ		
170	Salasar Enterprises	1,47,21,950	_
1/0	38309, Main Market, Najafgarh,	1,4/,21,950	_
	Delhi, 110028		
	07OIBPS3345R1ZA		
	Nitin Trading House		
171	Kh No 33/8/3, Ground Floor, Village	86,16,774	85,65,574
	Zindpur, Near Shiv Mandir, Delhi,		
	110036		
	07OPNPS8612L1ZS		
150	Gupta Enterprises		00 06 101
172	9092, Shiv Chowk, New Market	1,05,82,108	99,86,181
	Chawri Bazar, Delhi, 110020		
	07OWUPS4414J1ZJ		
450	Saraswati Enterprises		
173	Plot No. 118A, C-J, Kherki Extension,	1,82,36,873	1,80,08,598
	Saket, Delhi, 110017		
	08AAKPQ9466A1ZD		
	Basic Traders Rajasthan		
174	801, 8 th Floor, KJ City Tower, Ashok	4,92,06,402	4,27,03,431
	Marg, C-Scheme, Jaipur, 302001		
	08AJVPA9330R1ZD		
	Zodiac Traders		
175	Plot No. 2774, Ground Floor, Road No	6,41,31,253	6,37,43,673
	15 Vki, Jaipur, 302013		
	1. m. output, 302013		



	08AMFPB9365E1Z2		
	Ravi Kumar Suppliers		10
176	S-225, 2nd Floor, Mangalam Fun	1,38,66,483	1,39,68,203
	Squire Durga Nursery Road, Udaipur,		
	313003		
	08AOGPK6533E2ZZ		
	Imra Sales Rajasthan		
177	Office No701 E-2, 7 th Floor, KJ City	15,80,82,285	14,13,93,391
	Tower, Ashok Marg, C-Scheme,		
	Jaipur, 302005		
	09AAHCB5448H1ZG		
	BPSR Industries Pvt. Ltd.		
178	Shop No-91, Plot No CP-1, Jeewan	7,54,94,431	2,82,03,612
	Plaza, Viram Khand, Gomti Nagar,		, , , , ,
	Lucknow, U.P., 226010		
	09AAHCG0818Q1Z4		
	Gwalior Enterprises Pvt. Ltd.		
179	19B/101, Vrindavan Yojna, RBL Road,	22,14,63,269	7,05,65,030
	Lucknow, U.P., 226010		
	09AAHCG0827H1ZM		
	Ghaziabad Enterprises Pvt. Ltd.		
180	404, Trinity Harmony Apartment,		1 05 00 050
100		5,74,07,550	1,97,02,273
	Wazir Hasan Road, Dalibagh,		
	Lucknow, U.P., 266001		
	09AALCM8399L1ZC		
181	Mantova Enterprises Pvt. Ltd.	6,15,61,460	5,73,50,208
	Plot No-8, Gata No237, Village		
	Mubarakpur, Lucknow, 226021		
	09AGCPC4247K1ZF		
	Chauhan Traders		
182	17-B, G/F, Co-operative Industrial	5,11,69,920	-
	Area, Udyog Nagar, Kanpur, U.P.,		
	208022		
	09AIAPN1026D1ZT		
183	Nayak Trading Company	4,54,36,053	1,57,03,531
103	Bakshi Ka Talab, Ramendra Vihar	4,04,00,000	1,07,00,031
	Colony, Lucknow, U.P., 226002		
	09AILPC7741F2Z6		
184	M K Trading Co.	4,80,69,010	-
	Kamla Pur, Sitapur, U.P., 261302		
	09AJRPP5579P1ZT		
10-	Shiva Enterprises		
185	84/113, Keshav Bhawan, Carwalo	5,22,04,862	19,97,126
	Nagar, Kanpur Nagar, U.P., 208003		
	09ANOPN1634L1ZI		
	K C Laminates		
186		4,15,65,400	_
180	Singh Complex, Gurudwara Road,	4,10,00,400	
	Naka Hindola, U.P., 226004		
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	aaAOZDV((a=A)Z(
	09AOZPY6635A1Z6		
187	M.K. Trading Co.	5,31,37,267	-
	S-178, Lekhraj Khajana, Faizabad		
	Road, Lucknow, U.P., 226016		
	09ARMPJ4078Q1ZU		
188	Chandan Trading Company	5,35,94,752	36,774
100	Bhakhamau Behata, Paikaramau,	5,55,94,754	30,774
l	Lucknow, U.P., 227202		
	09AVKPN6952D1Z8		
	Rabindra Laminates		
189	132/717-A, Munshipurwa, Near	3,67,39,244	98,90,484
	Transport Nagar, Kanpur Nagar, U.P.,		
	208023		
	09AZOPB7727N1ZO		
	Manoj Laminates Sales		
190	Magath Asthi Road Bagdi, Tehsil,	1,19,10,617	-
	Bakshi Ka Talab, Lucknow, U.P.,	, ,, -, - ,	
	226201		
	09BDOPP0550N1ZZ		
	Vijay Sales		
191	Plot No. 30, G-5, D N Singh Complex,	1,65,18,536	_
191	Maharshi Nagar, IIM Road, Lucknow,	1,00,10,000	
	U.P., 226013		
	09BFTPT4792K1Z8		
	Tripathi Enterprises		
100	Nandgaon Road, Samken Colony Ke		
192		3,86,55,638	-
	Samne, Kosi Kalan, Chhata, Mathura,		
	U.P., 281403		
	09BKYPD3812J1ZR		
193	Lavanya Trading Co.	5,68,66,194	5,43,39,920
20	Shop No. 3, Gandhi Nagar, Kanpur,		0,10,07,7
	U.P., 208001		
	09BPTPB6759L2ZZ		
	S K Trading Company		
194	Shop No105, Palika Bazar,	15,90,49,837	-
	Kapoorthala, Aliganj, Lucknow, U.P.,		
	226024		
	09BTDPM7832B1ZQ		
	Unique Services		
195	H. No413/4, Ground Floor, Gazipur	-	1,11,82,883
	Near School Lane, Gazipur, U.P.,		
	110092		
	09BXNPA3450K1ZB		
	S.A. Enterprises		
196	E 2/8, Palika Bazar, Sector-C,	6,49,52,397	-
-	Kapoorthala, Aliganj, Lucknow, U.P.,	, , , , , , , , , , , , , , , , , , , ,	
	226024		
	09CBIPA0305H1Z7		
19 7	Govind Enterprises	5,21,30,063	-
	rate Conoral of Coods and Services Tax Intelligence Mean		Page 208 of 230



	N.H. 2, 1 st Floor, In front of Anaj		
	Mandi Gate No. 1, Kosi Kalan,		
	Mathura, U.P., 281403		
	09CECPK3695F1ZA		
	Anurag Sales		
198	B-322-A, Nandi Kunj Nandgram,	2,39,77,447	3,39,78,015
	Ghaziabad, U.P., 201003		
	09CJBPB4851J1Z8		
199	Tushar Laminates Sales	3,53,85,794	3,57,13,944
	Plot No CP-03, Mishrapur, Lucknow,		
	U.P., 209870		
	09COMPA0461D1ZB		
200	Vikram Sales	4,56,53,687	4,49,75,107
200	Plot No17, Kh No58, IIM Road,	4,00,00,007	4,49,73,107
	Semra Gaudi, Lucknow, U.P., 226020		
	09COXPK7095E1Z4		
201	Singha Enterprises		1= 69 609
201	G-3/183, Arogya Hospital, Vaishali	-	15,68,628
	Sector 6, Ghaziabad, U.P., 201014		
	09CVFPR9246F1Z2		
	Ripu Trading Company		
202	6/7, Labour Colony, Dada Nagar,	6,48,01,355	3,44,36,087
	Kanpur Nagar, U.P., 208022		
	09DDRPG1575H1Z5		
	Dev Warapers		
203	-	4,38,03,986	-
	Sitapur Road, Mohibullapur,	7,00,00,00	
	Lucknow, U.P., 226021		
	09DHFPD7637M1ZU		
	Naresh Sales		
204		4,78,46,888	4,58,12,613
204	Bhakhamau Kursi Road, Lucknow,	4,70,40,000	4,50,12,015
	U.P., 226021		
	09DJQPK5086N1Z6		
	K.M. Trading Co.		
205	Infront of Transformer, Nabiganj,	3,17,58,248	-
	Nawabganj, Barabanki, U.P., 225305		
	09DLHPR6532R1Z3		
	Kritika Trading Co.		
006	0		4 0 4 0 6 10 -
206	1 8, ,	4,40,05,019	4,04,26,185
	Murad Nagar, Ghaziabad, U.P.,		
	201206		
	09DMHPK7624A1Z4		
207	G.S. Trading Co.	2,76,29,740	-
	Mallahi Tola, Near Jal Sansthan,	,, -,-,,,, +*	
	Thakurganj, U.P., 226016		
	09DWWPS0227J1ZT		
208	P.C. Supplier Co.	3,29,32,603	-
	159, Sahara Shopping Center,		
Directo	rate General of Goods and Services Tax Intelligence. Mee	(a)	Page 209 of 230



	Faizabad Road, Indira Nagar		
	Lucknow, U.P., 226016		
	09EAVPB1764H1ZC		
	Sagar Trading Company		
209		4,76,05,544	36,86,135
-09	Mohanlalganj, Lucknow, U.P.,	4,70,00,044	30,00,133
	227300		
	09EFZPK0434N1ZN		
	Prashant Trading Company		
210	Shop No- FF-09, Arcate-1, IIM Road,	5,52,34,648	5,58,04,750
	Eldeco City, Lucknow, U.P., 226016		
	09ERSPB1888L1ZY		
	Prashanta Laminates		
211	A/F-21, 2 nd Floor, Parking No. 2, TP	2,19,77,096	-
	Nagar, Kanpur Road, Lucknow, U.P.,		
	226023		
	09ETKPS6789F1ZO		
212	Surya Trading Company	51,04,572	-
	Radha Krishna Pandey, Atariya,	0 / 1/0/	
	Sidhauli, Sitapur, U.P., 261303		
	09EXHPP4251A1ZJ		
213	Tanya Trading Company	4,37,50,762	13,41,754
0	15/2, Krishna Nagar Market,	+,07,00,70-	-0,,/0+
	Lucknow, U.P., 226023		
	09FCQPD3880Q1ZM		
	Shivam Enterprises		
214	6 and 7 New Chauhan Singh Market,	1,82,66,594	91,65,015
	Sitapur Road Tehsil Mod Mampur		
	Bana, Lucknow, U.P., 226201		
	09GUGPS2927N1ZR		
	R S Enterprises		
215	Khasra No54, Navikot Nandana,	6,94,75,989	-
	Sitapur Road, Bakshi Ka Talab,		
	Lucknow, U.P., 227202		
	09GXUPS5402R1Z7		
	Nisha Sales		
216	H. No. 554, Rajeev Nagar,	1,27,04,979	-
	Mahaviranpura, Jhansi Khas,		
	Jhanshi, U.P., 284003		
	09HAIPS2009Q1ZY		
	Manish Enterprises		
217	Near 132 KVA Bijli Ghar, Nandgaon	4,58,65,027	-
	Road, Kosi Kalan, Chhata, Mathura,		
	U.P., 281403		
	09HELPK0210L1ZE		
	Navnirman Traders		
218	TC/14, 3 rd Floor, Shashtri	3,86,90,778	-
	Commercials, Vibhooti Khand, Gomti		
	Nagar, Lucknow, U.P., 226010		
	rate General of Goods and Services Tax Intelligence. Me	(a)	Page 210 of 230



	09HMDPK2928B1Z5		
219	Rohit Enterprises	1,12,37,930	19,13,802
	Ijjat Nagar Colony, Mahipat Mau,	-,,0/,7/0°	
	Kakori, Lucknow, U.P., 226101		
220	09KJKPK2903P1ZH	1,75,07,570	42,38,149
	Shravan Packesing		
	Ground Floor, Gram Barawankala,		
	Jehta Road, Lucknow, U.P., 226101		
221	18AALCM8399L1ZD	3,81,91,061	97,11,977
	Mantova Enterprises Pvt. Ltd.		
	Hajo Road, Amingaon, Guwahati,		
	Kamrup, Assam, 781031		
222	18AALCM8855D1Z1	4,61,96,352	15,42,734
	Manchester Enterprises Pvt. Ltd.		
	300Sq, Orchid Garden, Khanamukh		
	Jalukbari Guwahati, Assam, 781014		
223	18AJUPU0082F1ZR		3,41,94,803
	Kamakhya Trading Co	9,71,17,397	
	75 Sqt, Orchid Garden, Khanmukh		
	Jalukbari, Guwahati, 781014		
224	18FCMPK4971D1Z9	5 07 00 705	18,51,243
	Khalid Traders		
	50Sq Feet, 1st Floor, Sri Ram Market,	5,97,00,795	
	Chatribari, Guwahati, Assam, 781001		
225	19ARFPM0150K1ZS		84,13,649
	Mas Sales Corporation	2,39,51,619	
	23, Ground Floor, Sir Syed Ahmed	2,39,51,019	
	Road, Kolkata, W.B., 700014		
226	20AAGFI6942P1Z2		
	Impex Global		
	194, Getalatu, Opposite BSNL	8,49,291	46,488
	Training Center, Vikash, Sadar,		
	Ranchi, Jharkhand, 835217		
227	21AAKPQ9466A1ZP		2,02,73,942
	Basic Traders	0 10 70 581	
	Plot No. 311F, CDA Sector-10, Market	2,13,72,581	
	Nagar, Cuttack, Odisha, 753014		
228	21AOGPK6533E2ZB		
	Polymart Traders	0.09.10.710	1 04 00 00-
	Plot No. 2335/4061/5323, Jagatpur,	2,08,13,719	1,24,23,285
	Cuttack, Orissa, 754021		
229	22ADBPT8598E1Z8		
	Bhagyashree Sales	3,42,60,323	-
	Shop No6 Manglam Mall, Near		
	Agrasen Chowk, Samta Colony,		
	Raipur, Chhattisgarh, 492001		
	22APSPC9712N1ZI		
230	Choudhary Sales	2,63,64,811	3,90,813
	Shop No-5, Block No-5, Rawabhata,	, 2, 1,	
Directorate Ceneral of Coods and Services Tax Intelligence Meerut 7 and 9 nit Page 211 of 230			



	Transport Nagar, Raipur,		
	Chhattisgarh, 492003		
	22BTDPJ4048N1ZM		
231	Raipur Sales	5,69,45,218	1 56 904
231	G/10, Wing-III, Capital Palace, Kavita	5,09,45,210	1,56,804
	Nagar, Raipur, Chhattisgarh, 492001		
	22BXDPG5417J1ZQ		
	Astha Traders		
232	Rajesh Complex, Block No-9, Parking	4,90,55,189	-
Ū	No-6, Transport Nagar, Ravatbhata,		
	Raipur, Chhattisgarh, 492003		
	22DGAPS4834P1ZZ		
	Dilip Enterprises		
233	Shop No-42, Block No-07,	8,31,97,011	2,93,662
-00	Rawabhata, Transport Nagar, Raipur,	0,01,07,011	_,)(),00
	Chhattisgarh, 492003		
	22IVTPS1390K1ZT		
	R.B. Enterprises		
234	Shop No-6, Manglam Mall, Near	1,45,93,360	_
-94	Agrasen Chowk, Samta Colony,	1,40,90,000	
	Raipur, Chhattisgarh, 492001		
	23ABVPO1550F2ZM		
	Asha Industries		
235	79, Iqtadar Manzil, Opp Moti Masjid,	14,14,010	8,97,414
	Bhopal, M.P., 462001		
	23ADWPT8362K1ZM		
	Simran Trading		
236	0	4,60,23,960	24,89,960
230	Bhind Road, Gole Ka Mandir,	4,00,23,900	24,09,900
	Gwalior, M.P., 474005		
	23AHHPT2260P1ZY		
	D.K. Enterprises		
997	459 North Avenyu, Sukhliya Near	1,68,24,276	2,46,164
237	Gineshwar School, Vijay Nagar,	1,00,24,2/0	2,40,104
	Indore, M.P., 452010		
	23AMWPM1054A1ZC		
	Om Sai Trading Company		
00Q	Shop No9, TT Nagar, Pipliya Kumar	1 70 04 069	60.85 404
238	Dewas, Near Metro Shopping Mall,	1,72,34,968	60,85,404
	Indore, M.P., 453771		
	23APYPT1275M1Z1 Tomar Sales		
		4 05 45 508	
239	Kheriya Mirdha, Sandhu Market,	4,35,47,598	2,55,36,120
	Gwalior Bypass Road, Gwalior, M.P.,		
	474003		
	23AVVPG2313G1ZT		
240	Gaurav Corporation	2,16,24,618	1,00,12,308
-7~	I4, Aditya Puram, Airport Road,	, , , , = =	, , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	Gwalior, M.P., 474002		



	23BHFPH9745E1ZE HR Enterprise		
241	1/2 C-01, Vayu Nagar, Bhind Road, Gwalior, M.P., 474020	1,73,38,028	3,86,695
	23BPJPS8789B1ZE		
	Kansana Enterprises		
242	6, Chota Bangadha Road, Indore,	3,10,55,938	12,52,467
	M.P., 452005		
	23BPJPS8789B2ZD		
	Dharmveer Sales		
243	47 Jiwajiganj, Gandhi Hospital Road,	7,45,38,048	67,48,101
	Morena, 476001		
	23BXDPG5417J1ZO		
	Ashta Traders		
244	Jayendraganj, F-27, Sanjay Complex,	4,30,13,685	-
	Lashkar, Gwalior, M.P., 474001		
	23EHFPP8744G1Z2		
	J M D Trading Co		
245	Shope No2, Gram Mohala, Bypass	9,36,84,544	25,89,831
	Road, Bhopal, M.P., 462023		
	23ELVPK9548F1ZG		
	Kumar Traders		
246	H. No. 5, Bihari Colony, Vidisha	4,53,55,594	2,01,951
	Road, Bhanpur, Bhopal, M.P., 462038		
	23FLVPR3392P1ZX		
	Rawat Trading Company		
247	E19, Amaltas Colony, Gole Ka Mandir,	2,10,61,284	1,84,76,788
	Gwalior, M.P., 474005		
	23GQNPS5195F1Z9		
	Ahmana Traders		
248		3,26,75,208	11,20,805
	Bhanpur Chouraha, Bhopal, M.P.,	0,,,0,	,,0
	462010		
	23HRAPS7815D1ZS		
	P S Corporation		
249	H. No. 118, Barkhedi, Aish Bagh	19,73,06,779	7,39,32,399
	Road, Bhopal, M.P., 462008		
	24ATUPD1928M1ZB		
	Alfa Enterprises		
250	Shop 2, 1 st Floor, Opp. Sarni Kamdar	28,89,64,993	25,34,02,542
	Society, Nr. N.K. School, Jivraj Park,		/ ·· ·
	Ahmedabad, Gujarat, 380051		
	24DKHPM5514D1ZF		
	S M Traders		
251	Godown No. 9, S.K. Tiles Compound,	30,84,81,541	24,17,81,049
	Sarkhej Sanand Road, Sarkhej,		
	Ahmedabad, Gujarat, 382210		
0.50	27AHHPT2260P1ZQ	00.00.00-	
252	D.K. Enterprises	93,98,035	-
Directo	rate General of Goods and Services Tax Intelligence, Mee	wate 7 and 9 mit	Page 213 of 230



<u>ц</u>	I. No. 1016-A Bhandara Road, Near		
1 1	janta Tea Company, Hansapuri,		
	Jaharashtra, 440018		
	9ABPPZ7252H1ZR		
1 1	legant Traders		
- ツニツ -	ituated at 1 st Main 120, Padmeshwari	4,56,19,198	3,94,53,221
	Nagar Near Kamadhenu Devi Temple,		
	Cittaganur Virgo Nagar, Bengaluru		
	Jrban, Karnataka, 560049		
	9CMQPP6968Q1ZF		
	M Traders		
954	No. 46, Situated Opp to Christ King	8,34,61,566	8,59,04,467
0	chool, 7 th Cross Akshaya Nagar, New		
1 1	Ianjunath Layout Ramurthy Nagar,		
	Bengaluru Urban, Karnataka, 560016		
	6AAQPZ7304Q1ZL		
	9 Trading Co.		
	4, 1, 482, Darusalam Opp Voulga	72,91,405	75,66,191
1 1	Iotel Goshamahal Road, Hyderabad,		
	elangana, 500001		
	6BGUPA2323M1Z8		
1 1	Crystal Traders		
	8-13-8/A/28 and Farhen, Gagan	6,92,87,241	4,32,14,622
1 1	ahad, Katedan, Rangareddy,		
	elangana, 500077		
	6BHEPT2410B1ZU		
957	urya Enterprises	4,20,81,000	2,82,58,273
S	y No 15, 24, 25, 26, 27, Kothaguda,	7,20,01,000	2,02,00,2/0
	ondapur, Telangana, 500084		
-	6BNVPK3975K1Z2		
1 1	1ask Enterprises		
	-3-125/2/A, Shahatam Nagar	91,23,883	90,93,848
	Iohammadi Lines Golconda,		
H	Iyderabad, Telangana, 500008		
-	6BPAPA5534D1ZH		
	IAZ Traders		
259 23	2-8-588/1, Lakkad Kote, Chatta	1,23,42,196	1,59,025
B	azar, Charminar, Hyderabad,		
Т	elangana, 500002		

14.3 Now therefore, the Directors/Partners (as applicable) of the aforesaid 259 firms/companies are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A) and 122(3)(a) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.



15. Now therefore, M/s Bharat Transport company Pvt. Ltd., and Mr. Sujeet Kumar Singh actual owner of M/s Bharat Transport company Pvt. Ltd., are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a), (c) & (e) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

15.1 Now, therefore M/s Paras Transport Co., M/s Raj Kumar Transports, M/s Pitambara Freight Carriers, M/s Sahara Transport Co., and M/s Radha Krishna Freight Carrier through their proprietors/partners, are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a), (c) & (e) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

15.2 Now therefore, Mr. Shekhar Gupta and Shri Sandeep Gupta are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a) & (c) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

15.3 Now therefore, Mohd. Shadab Quadri and Mohd. Ali Akram Khan are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi as to why penalty should not be imposed on them under Section 122(1A), 122(3)(a) & (c) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

15.4 Now therefore, Shri Dipanshu Gupta and Shri Sarang Jhunjhunwala are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi to why penalty should not be imposed on them under Section 122(1A), 122(3)(a) & (c) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.

15.5 Now therefore, M/s Dealistix India Pvt. Ltd., and its director Shri Ratan Chand, are hereby required to show cause to the Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi to why penalty should not be imposed on them under Section 122(1A), 122(3)(a) & (c) and Section 127 of the CGST Act, 2017 read with similar provisions of the SGST Act, 2017 and/or under Section 20 of the IGST Act, 2017.



16. The Noticee and co-noticee are further required to produce all the evidence(s) upon which they intend to rely in support of their defence at the time of showing cause. They are further required to mention in their reply whether they wish to be heard in person before the case is adjudicated. If no cause is shown within 30 days of receipt of this notice or if they do not appear before the adjudicating authority when the case is posted for hearing, the same will be decided based on the evidence available on record.

17. This notice is being issued based on records/information available without any prejudice to any other action that is being taken or may be taken against the Noticee and co-Noticee under the provisions of the CGST Act 2017, the SGST Act 2017, and the IGST Act, 2017, and the rules made thereunder, or any other law for the time being in force in India.

18. The department reserves the right for amendment, modification, addition/supplementation, and deletion to this Show Cause Notice at a subsequent date if need arises.

19. Reliance for the issue of the notice is based on the documents listed in the table below (RUD – 1 to 428, GST Returns, details of inward/outward e-way bills generated i.r.t. various bogus firms discussed in this notice). The RUDs are enclosed in soft copy with this SCN.

20. Further, all the noticees are requested to collect the non-relied upon documents within thirty (30) days of the receipt of this Show Cause Notice from Ghaziabad Regional unit at 4th Floor, Arrow Corporate Tower, Plot No. 6, Sector-14, Kaushambi, Ghaziabad-201012 on any working day with prior intimation.

Minu Shukla Pathak, Additional Director.

Copy Forwarded To:

- 1. The Additional/Joint Commissioner, Central GST Commissionerate, Delhi North, Office of the Principal Commissioner, CR Building, IP Estate, New Delhi, along with all RUDs, with the request to forward a copy of the Adjudication Order.
- 2. Guard File

Rishikesh Singh, Deputy Director.



Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit F.No. DGG1/INV/GST/1757/2021/GRU Page 216 of 230

RELIED UPON DOCUMENTS:

RUD	DESCRIPTION OF RUD
No.	Panahnama datad 15 06 0001 draym at M/a Mantaga Entermises B+ 1+1. O an ap Outer
1	Panchnama dated 15.06.2021 drawn at M/s Montage Enterprises Pvt. Ltd., C-20-22, Sector- 57, Noida, U.P., 201301.
2	Panchnama dated 14 & 15.06.2021 drawn at M/s Montage Enterprises Pvt. Ltd., 29A,
	Industrial Area, Malanpur, Bhind, M.P., 477117.
3	Panchnama dated 14 & 15.06.2021 drawn at M/s Montage Enterprises Pvt. Ltd., Plot No.13, Sector-11, IIE SIDCUL, Haridwar, Uttarakhand, 249403.
4	Panchnama dated 16.06.2021 drawn at M/s Montage Enterprises Pvt. Ltd., Lane No. 4, Phase- 1, SIDCO Industrial Area, Bari Brahmana, Samba, Jammu & Kashmir, 181133.
5	Panchnama dated 14 & 15.06.2021 drawn at M/s Montage Sales Pvt. Ltd., Plot No. B-26, B-Block, Jhilmil Industrial Area, Delhi.
	Panchnama dated 14.06.2021 drawn at M/s Montage Flexipack Sales Pvt. Ltd., Warehouse
6	No.3, Back Portion, Village-Gahru, Pargana-Bijnore, Khasra No.1441, Old No. 1664/1, Daroga
	Khera, Opposite Bal Bhawan, Lucknow-Kanpur Road, NH-25, Lucknow, U.P., 226012.
7	Panchnama dated 14 & 15.06.2021 drawn at M/s Montage Printpack Sales Pvt. Ltd., Khasra
, 	No. 1610, Mahal Gaon, Near Saroj Fuel Shop, Jhansi Road, Gwalior.
8	Panchnama dated 15.11.2021 drawn at C-17, Chi-IV, Greater Noida, U.P., being residential premise of Shri Arvind Gupta, Promoter Director of M/s MEPL.
9	Panchnama dated 15.11.2021 drawn at B-95, Sector-72, Noida, U.P., being residential premise
-	of Shri H.S. Matharu, Director of M/s MSPL, Delhi.
	Panchnama dated 25.06.2021 drawn at Flat No. 102, Tower Marvella, Mahagun Moderne,
10	Sector-78, Noida being residential premise of Shri Sujeet Kumar Singh, owner of M/s Bharat Transport Company Pvt. Ltd.
	Panchnama dated 14.06.2021 drawn at M/s Paras Transport Co., Shop No 2B, Ground Floor,
11	Anant Best Home 4, Sarfabad, Sector-72, Noida, U.P., 201301.
10	Panchnama dated 14.06.2021 drawn at M/s Raj Kumar Transports, Property No. 461, G-
12	Block, 40 Feet Road, Near Shubham Garden, Molar Band Extension, Badarpur, Delhi, 110044.
13	Panchnama dated 15.06.2021 drawn at M/s Pitambara Freight Carriers, Old Sodi Filing Station, Maharaj Pura, Gwalior, M.P.
14	Panchnama dated 15.06.2021 drawn at M/s Sahara Transport Co. D-59, Sector-07, Noida.
14	File @Sl.No. 17 of the INS-02 of the Panchnama dated 25.06.2021 dated 15.06.2021 drawn at
15	residential premise of Shri Sujeet Kumar Singh, owner of M/s BTCPL.
16	Statement dated 25.06.2021 of Shri Sujeet Kumar Singh, owner of M/s BTCPL.
17	Panchnama/Visit Report of M/s Globe Enterprises.
18	A. Panchnama/Visit Report of M/s BPSR Industries Pvt. Ltd.
10	B. Summons issued to M/s BPSR Industries Pvt. Ltd.
19	A. Panchnama/Visit Report of M/s Catania Enterprises Pvt. Ltd.
	B. Summons issued to M/s Catania Enterprises Pvt. Ltd.A. Panchnama/Visit Report of M/s Gwalior Enterprises Pvt. Ltd.
20	B. Summons issued to M/s Gwalior Enterprises Pvt. Ltd.
21	A. Panchnama/Visit Report of M/s Ghaziabad Enterprises Pvt. Ltd.
41	B. Summons issued to M/s Ghaziabad Enterprises Pvt. Ltd.
22	A. Panchnama/Visit Report of M/s Mantova Enterprises Pvt. Ltd.B. Summons issued to M/s Mantova Enterprises Pvt. Ltd.
00	A. Panchnama/Visit Report of M/s Global Trading Co
23	B. Summons issued to M/s Global Trading Co
24	Panchnama/Visit Report of M/s Proview Traders
25	Panchnama/Visit Report of M/s P B Associates
	A. Panchnama/Visit Report of M/s Gravity Enterprises
26	B. Summons issued to M/s Gravity Enterprises

Directorate General of Goods and Services Tax Intelligence, Meerut Zonal Unit F.No. DGGI/INV/GST/1757/2021/GRU

	A. Panchnama/Visit Report of M/s Nirbhay Trading Co.
2 7	B. Summons issued to M/s Nirbhay Trading Co.
	A. Panchnama/Visit Report of M/s Genius Enterprises
28	B. Summons issued to M/s Genius Enterprises
	A. Panchnama/Visit Report of M/s Arya Trading
29	B. Summons issued to M/s Arya Trading
	A. Panchnama/Visit Report of M/s Sanjay Trading Co
30	B. Summons issued to M/s Sanjay Trading Co
	A. Panchnama/Visit Report of M/s M.R. Enterprises
31	B. Summons issued to M/s M.R. Enterprises
	A. Panchnama/Visit Report of M/s Gupta Enterprises
32	B. Summons issued to M/s Gupta Enterprises
	A. Panchnama/Visit Report of M/s Nafeesh Trading Co.
33	B. Summons issued to M/s Nafeesh Trading Co.
34	Panchnama/Visit Report of M/s Sun Trading Company
54	A. Panchnama/Visit Report of M/s Ridhi Traders
35	B. Summons issued to M/s Ridhi Traders
	A. Panchnama/Visit Report of M/s Unique Traders
36	B. Summons issued to M/s Unique Traders
	A. Panchnama/Visit Report of M/s Mayo Enterprises
3 7	B. Summons issued to M/s Mayo Enterprises
-	A. Panchnama/Visit Report of M/s P.C. Supplier Co.
38	B. Summons issued to M/s P.C. Supplier Co.
	A. Panchnama/Visit Report of M/s D K Trading Company
39	B. Summons issued to M/s D K Trading Company
	A. Panchnama/Visit Report of M/s Rai Enterprises
40	B. Summons issued to M/s Rai Enterprises
41	Panchnama/Visit Report of M/s R.N Trading Co
40	A. Panchnama/Visit Report of M/s Om Trading Company
42	B. Summons issued to M/s Om Trading Company
40	A. Panchnama/Visit Report of M/s Singhania Enterprises
43	B. Summons issued to M/s Singhania Enterprises
44	A. Panchnama/Visit Report of M/s Avtar Trading Company
44	B. Summons issued to M/s Avtar Trading Company
45	Panchnama/Visit Report of M/s Pal Trading Co.
46	A. Panchnama/Visit Report of M/s Aripha Trading Co.
۳°	B. Summons issued to M/s Aripha Trading Co.
47	A. Panchnama/Visit Report of M/s Adheera Traders
т/	B. Summons issued to M/s Adheera Traders
48	A. Panchnama/Visit Report of M/s Alston Traders
	B. Summons issued to M/s Alston Traders
49	A. Panchnama/Visit Report of M/s Harish Traders
	B. Summons issued to M/s Harish Traders
50	A. Panchnama/Visit Report of M/s Vicky Trading Co
•	B. Summons issued to M/s Vicky Trading Co
51	A. Panchnama/Visit Report of M/s Maurya Enterprises
-	B. Summons issued to M/s Maurya Enterprises
52	A. Panchnama/Visit Report of M/s Ram Enterprises
-	B. Summons issued to M/s Ram Enterprises
53	A. Panchnama/Visit Report of M/s Gyan Traders
	B. Summons issued to M/s Gyan Traders A. Panchnama/Visit Report of M/s Golf Traders
54	
5 4	B. Summons issued to M/s Golf Traders



	A. Panchnama/Visit Report of M/s MK Enterprises
55	B. Summons issued to M/s MK Enterprises
	A. Panchnama/Visit Report of M/s Kumar Enterprises
56	B. Summons issued to M/s Kumar Enterprises
	A. Panchnama/Visit Report of M/s Mau Traders
57	B. Summons issued to M/s Mau Traders
-0	A. Panchnama/Visit Report of M/s A S Sales
58	B. Summons issued to M/s A S Sales
	A. Panchnama/Visit Report of M/s Iconic International
59	B. Summons issued to M/s Iconic International
60	Panchnama/Visit Report of M/s S.S. Trading Co.
61	A. Panchnama/Visit Report of M/s Suraj Enterprises
01	B. Summons issued to M/s Suraj Enterprises
62	A. Panchnama/Visit Report of M/s G.S. Trading
02	B. Summons issued to M/s G.S. Trading
63	Panchnama/Visit Report of M/s Basic Traders Rajasthan
64	Panchnama/Visit Report of M/s Zodiac Traders
65	Panchnama/Visit Report of M/s Imra Sales Rajasthan
66	A. Panchnama/Visit Report of M/s BPSR Industries Pvt. Ltd.
	B. Summons issued to M/s BPSR Industries Pvt. Ltd.
67	A. Panchnama/Visit Report of M/s Gwalior Enterprises Pvt. Ltd.
	B. Summons issued to M/s Gwalior Enterprises Pvt. Ltd.
68	A. SCN & Order for Cancellation of GSTIN of M/s Ghaziabad Enterprises Pvt. Ltd.
	B. Summons issued to M/s Ghaziabad Enterprises Pvt. Ltd.
69	A. Panchnama/Visit Report of M/s Mantova Enterprises Pvt. Ltd.
	B. Summons issued to M/s Mantova Enterprises Pvt. Ltd.
70	A. Panchnama/Visit Report of M/s M K Trading Co.
	B. Summons issued to M/s M K Trading Co.
71	A. Panchnama/Visit Report of M/s M.K. Trading Co.B. Summons issued to M/s M.K. Trading Co.
	A. Panchnama/Visit Report of M/s Tripathi Enterprises
72	B. Summons issued to M/s Tripath Enterprises
	A. Panchnama/Visit Report of M/s S K Trading Company
73	B. Summons issued to M/s S K Trading Company
	A. Panchnama/Visit Report of M/s Rajeev Trading Co.
74	B. Summons issued to M/s Rajeev Trading Co.
	A. Panchnama/Visit Report of M/s Avtar Trading Co.
75	B. Summons issued to M/s Avtar Trading Co.
=6	A. Panchnama/Visit Report of M/s S.A. Enterprises
76	B. Summons issued to M/s S.A. Enterprises
	A. Panchnama/Visit Report of M/s Govind Enterprises
77	B. Summons issued to M/s Govind Enterprises
78	A. Panchnama/Visit Report of M/s K.M. Trading Co.
/0	B. Summons issued to M/s K.M. Trading Co.
79	A. Panchnama/Visit Report of M/s G.S. Trading Co.
	B. Summons issued to M/s G.S. Trading Co.
80	A. Panchnama/Visit Report of M/s P.C. Supplier Co.
	B. Summons issued to M/s P.C. Supplier Co.
81	A. Panchnama/Visit Report of M/s Surya Trading Company
	B. Summons issued to M/s Surya Trading Company
82	A. Panchnama/Visit Report of M/s R S Enterprises
80	B. Summons issued to M/s R S EnterprisesA. Panchnama/Visit Report of M/s Nisha Sales
83	A. Panchnama/Visit Report of M/s Nisha Sales $D_{1} + L_{2} $



	B. Summons issued to M/s Nisha Sales	
84	A. Panchnama/Visit Report of M/s Manish Enterprises	
	B. Summons issued to M/s Manish Enterprises	
85	Panchnama/Visit Report of M/s Mantova Enterprises Pvt. Ltd.	
86	Panchnama/Visit Report of M/s Manchester Enterprises Pvt. Ltd.	
87	SCN & Order of Cancellation of M/s Mas Sales Corporation	
88	SCN & Order of Cancellation of M/s Impex Global	
0.0	A. Panchnama/Visit Report of M/s Bhagyashree Sales	
89	B. Summons issued to M/s Bhagyashree Sales	
	A. Panchnama/Visit Report of M/s Raipur Sales	
90	B. Summons issued to M/s Raipur Sales	
01	A. Panchnama/Visit Report of M/s Astha Traders	
91	B. Summons issued to M/s Astha Traders	
	A. Panchnama/Visit Report of M/s R.B. Enterprises	
92	B. Summons issued to M/s R.B. Enterprises	
93	SCN & Order for Cancellation of GSTIN of M/s Asha Industries	
	A. Order of M/s Simran Trading	
94	B. Summons issued to M/s Simran Trading	
95	SCN & Order for cancellation of GSTIN of M/s Gaurav Corporation	
96	Summons issued to M/s Ashta Traders	
	A. SCN & Order for Cancellation of GSTIN of M/s J M D Trading Co	
97	B. Summons issued to M/s J M D Trading Co	
0	A. Order for Cancellation of GSTIN of M/s P S Corporation	
98	B. Summons issued to M/s P S Corporation	
00	A. Order of Cancellation of GSTIN of M/s Alfa Enterprises	
99	B. Summons issued to M/s Alfa Enterprises	
100	A. Screenshot of Cancellation of GSTIN of M/s S M Traders	
100	B. Summons issued to M/s S M Traders	
101	A. SCN & Order for Cancellation of GSTIN of M/s Elegant Traders	
101	B. Summons issued to M/s Elegant Traders	
102	SCN issued to M/s Impact Traders	
103	SCN issued to M/s Multilayer Traders	
104	A. Screenshot of Cancellation of GSTIN of M/s A M Traders	
104	B. Summons issued to M/s A M Traders	
105	SCN & Order for cancellation of GSTIN of M/s Crystal Traders	
106	Summons issued to M/s MAZ Traders	
107	Summons issued to M/s Osis International	
108	A. Panchnama/Visit Report of M/s Jai Bhawani Traders	
100	B. Summons issued to M/s Jai Bhawani Traders	
109	Summons issued to M/s United International	
110	Summons issued to M/s Ganpati Enterprises	
111	A. Panchnama/Visit Report of M/s Shri Mahaveer Ji Sales Corporation	
	B. Summons issued to M/s Shri Mahaveer Ji Sales Corporation	
112	A. Panchnama/Visit Report of M/s Urban Trade Industries	
	B. Summons issued to M/s Urban Trade Industries	
113	A. Panchnama/Visit Report of M/s Elfed Industries	
113	B. Summons issued to M/s Elfed Industries	
114	SCN & Order for Cancellation of GSTIN M/s Life Wellness	
115	A. Panchnama/Visit Report of M/s Arranger Tradelinks (India) Pvt. Ltd.	
113	B. Summons issued to M/s Arranger Tradelinks (India) Pvt. Ltd.	
116	A. Panchnama/Visit Report of M/s Avi Foil Traders	
110	B. Summons issued to M/s Avi Foil Traders	
117	A. Panchnama/Visit Report of M/s Swastik Enterprises	
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	B. Summons issued to M/s Swastik Enterprises
	A. Panchnama/Visit Report of M/s Radical Corporation
118	B. Summons issued to M/s Radical Corporation
	A. Panchnama/Visit Report of M/s Surya Enterprises
119	B. Summons issued to M/s Surya Enterprises
	A. Panchnama/Visit Report of M/s S.G. Enterprises
120	B. Summons issued to M/s S.G. Enterprises
	A. Panchnama/Visit Report of M/s Mahalaxmi Enterprises
121	B. Summons issued to M/s Mahalaxmi Enterprises
	A. Panchnama/Visit Report of M/s Aavesh Enterprises
122	B. Summons issued to M/s Aavesh Enterprises
	A. Panchnama/Visit Report of M/s Blue Star
123	B. Summons issued to M/s Blue Star
10.4	A. Panchnama/Visit Report of M/s Aggarwal Traders
124	B. Summons issued to M/s Aggarwal Traders
195	A. SCN & Order for cancellation of GSTIN of S S Traders
125	B. Summons issued to M/s S S Traders
126	A. Panchnama/Visit Report of M/s Yadav Enterprises
120	B. Summons issued to M/s Yadav Enterprises
127	A. Panchnama/Visit Report of M/s Mehul Enterprises
14/	B. Summons issued to M/s Mehul Enterprises
128	A. Panchnama/Visit Report of M/s S. V. Enterprises
120	B. Summons issued to M/s S. V. Enterprises
129	A. Panchnama/Visit Report of M/s Kumar Enterprises
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130	A. Panchnama/Visit Report of M/s Jajoria Enterprise
-	B. Summons issued to M/s Jajoria Enterprise
131	A. Panchnama/Visit Report of M/s P.R. Traders
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132	B. Summons issued to M/s Galaxy Impex
	A. Panchnama/Visit Report of M/s Sunil S Traders
133	B. Summons issued to M/s Sunil S Traders
	A. Panchnama/Visit Report of M/s Image India
134	B. Summons issued to M/s Image India
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135	B. Summons issued to M/s Sky International
	A. Panchnama/Visit Report of M/s Tyagi Traders
136	B. Summons issued to M/s Tyagi Traders
	A. Panchnama/Visit Report of M/s ST Traders
137	B. Summons issued to M/s ST Traders
100	A. Panchnama/Visit Report of M/s Das Enterprises
138	B. Summons issued to M/s Das Enterprises
190	A. Panchnama/Visit Report of M/s Vishal Enterprises
139	B. Summons issued to M/s Vishal Enterprises
140	A. Panchnama/Visit Report of M/s Ajay Trading Co
-40	B. Summons issued to M/s Ajay Trading Co
141	A. Panchnama/Visit Report of M/s Renu Enterprises
#*	B. Summons issued to M/s Renu Enterprises
142	A. Panchnama/Visit Report of M/s Ragni Enterprises
•-	B. Summons issued to M/s Ragni Enterprises
143	A. Panchnama/Visit Report of M/s Kapur Enterprises
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144	B. Summons issued to M/s Esprit Enterprises
	A. Panchnama/Visit Report of M/s Acrosys Tech
145	B. Summons issued to M/s Acrosys Tech
	A. Panchnama/Visit Report of M/s Virgo Enterprises
146	B. Summons issued to M/s Virgo Enterprises
	A. Panchnama/Visit Report of M/s Azad Trading
147	B. Summons issued to M/s Azad Trading
149	A. Panchnama/Visit Report of M/s Hari Sales Corporation
148	B. Summons issued to M/s Hari Sales Corporation
149	A. Panchnama/Visit Report of M/s Winjet Industries
149	B. Summons issued to M/s Winjet Industries
150	A. Panchnama/Visit Report of M/s Subrat Trading Company
1.30	B. Summons issued to M/s Subrat Trading Company
151	A. Panchnama/Visit Report of M/s Tiwari Trading Company
-0-	B. Summons issued to M/s Tiwari Trading Company
152	A. Panchnama/Visit Report of M/s Ganpati Enterprises
	B. Summons issued to M/s Ganpati Enterprises
153	A. Panchnama/Visit Report of M/s Vikas Trading Company
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154	 A. Panchnama/Visit Report of M/s Raghav Traders B. Summons issued to M/s Raghav Traders
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155	B. Summons issued to M/s Barfani Traders
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150	A. Panchnama/Visit Report of M/s Pitambar Packaging
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160	A. Panchnama/Visit Report of M/s Pramod Traders
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161	A. Panchnama/Visit Report of M/s Maruti Trading Company
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162	A. Panchnama/Visit Report of M/s Unique Traders
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163	A. Panchnama/Visit Report of M/s Swastik Enterprises
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164	A. Panchnama/Visit Report of M/s Sameer Trading Company
165	B. Summons issued to M/s Sameer Trading Company
	A. Panchnama/Visit Report of M/s H K Enterprises
166	B. Summons issued to M/s H K Enterprises
-	A. Panchnama/Visit Report of M/s Shayam Impex
167	B. Summons issued to M/s Shayam Impex
4(0	A. Panchnama/Visit Report of M/s Jai Bhawani Traders
168	B. Summons issued to M/s Jai Bhawani Traders
169	A. SCN for Cancellation of GSTIN of Mehul Enterprises
109	B. Summons issued to M/s Mehul Enterprises
170	A. Panchnama/Visit Report of M/s Niraj Enterprises
1/0	B. Summons issued to M/s Niraj Enterprises



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	B. Summons issued to M/s Durga Enterprises
172	A. Panchnama/Visit Report of M/s Satyanarayan Traders
	B. Summons issued to M/s Satyanarayan Traders
173	A. Panchnama/Visit Report of M/s Gokul Enterprises
	B. Summons issued to M/s Gokul Enterprises
174	A. Panchnama/Visit Report of M/s Ganapati Enterprises
	B. Summons issued to M/s Ganapati Enterprises
175	A. Panchnama/Visit Report of M/s Kavita Industries
/0	B. Summons issued to M/s Kavita Industries
176	A. Panchnama/Visit Report of M/s A M Enterprises
_/ -	B. Summons issued to M/s A M Enterprises
177	A. Panchnama/Visit Report of M/s Gupta Traders
-//	B. Summons issued to M/s Gupta Traders
178	A. SCN & Order for Cancellation of GSTIN of Dinesh Enterprises
1/0	B. Summons issued to M/s Dinesh Enterprises
179	A. Panchnama/Visit Report of M/s Mahaveer Industries
-/9	B. Summons issued to M/s Mahaveer Industries
180	A. Panchnama/Visit Report of M/s Sitakant Trading Co.
	B. Summons issued to M/s Sitakant Trading Co.
181	A. Panchnama/Visit Report of M/s Gita Enterprises
	B. Summons issued to M/s Gita Enterprises
182	A. Panchnama/Visit Report of M/s Gupta Enterprises
10-	B. Summons issued to M/s Gupta Enterprises
183	A. Panchnama/Visit Report of M/s Gupta Enterprises
105	B. Summons issued to M/s Gupta Enterprises
184	A. Panchnama/Visit Report of M/s Subham Warpers
104	B. Summons issued to M/s Subham Warpers
185	A. Panchnama/Visit Report of M/s Kumar Enterprises
105	B. Summons issued to M/s Kumar Enterprises
186	A. Panchnama/Visit Report of M/s Universal Traders
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187	A. Panchnama/Visit Report of M/s Jagdamba Enterprises
107	B. Summons issued to M/s Jagdamba Enterprises
188	A. Panchnama/Visit Report of M/s Singh Enterprises
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189	A. Panchnama/Visit Report of M/s Rajkishore Trading
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190	A. Panchnama/Visit Report of M/s Sharma Enterprises
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191	A. Panchnama/Visit Report of M/s Pradhan Trading Co
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192	A. Panchnama/Visit Report of M/s BSA Industries
	B. Summons issued to M/s BSA Industries
193	A. Panchnama/Visit Report of M/s Shiv Shakti Enterprises
-70	B. Summons issued to M/s Shiv Shakti Enterprises
194	A. Panchnama/Visit Report of M/s Rajasthan Udyog
-/-	B. Summons issued to M/s Rajasthan Udyog
195	A. Panchnama/Visit Report of M/s JK Trading Co.
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196	Panchnama/Visit Report of M/s Jyoti Traders
197	Panchnama/Visit Report of M/s Soham Marketing
198	A. Panchnama/Visit Report of M/s Concept



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199	B. Summons issued to M/s Starnx Enterprises
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200	B. Summons issued to M/s Surva Enterprises
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201	B. Summons issued to M/s Shree Jee Traders
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202	B. Summons issued to M/s KC Laminates
	A. SCN & Order for Cancellation of GSTIN of M/s Mahadev Enterprises
203	B. Summons issued to M/s Mahadev Enterprises
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204	B. Summons issued to M/s Pandit Traders
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205	B. Summons issued to M/s Pandit Traders
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206	B. Summons issued to M/s Shine International
	A. Panchnama/Visit Report of M/s Ashoka Industry
207	B. Summons issued to M/s Ashoka Industry
	A. Panchnama/Visit Report of M/s Vishnu Traders
208	B. Summons issued to M/s Vishnu Traders
	A. Panchnama/Visit Report of M/s J P Enterprises
209	B. Summons issued to M/s J P Enterprises
~ . ~	A. SCN & Order for Cancellation of GSTIN of Lalit Enterprises
210	B. Summons issued to M/s Lalit Enterprises
~	A. Panchnama/Visit Report of M/s Singh International
211	B. Summons issued to M/s Singh International
	A. Panchnama/Visit Report of M/s Krishna Traders
212	B. Summons issued to M/s Krishna Traders
010	A. Panchnama/Visit Report of M/s Kailash Enterprises
213	B. Summons issued to M/s Kailash Enterprises
214	A. Panchnama/Visit Report of M/s Seaborne Creations
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215	A. Panchnama/Visit Report of M/s Shiv International
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216	A. Panchnama/Visit Report of M/s Prasad Enterprises
210	B. Summons issued to M/s Prasad Enterprises
217	A. Panchnama/Visit Report of M/s Shree Shyam Trading Company
21/	B. Summons issued to M/s Shree Shyam Trading Company
218	A. SCN & Order of Cancellation of Shree Ji Enterprises
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219	A. Panchnama/Visit Report of M/s Gee Key Sales
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220	A. Panchnama/Visit Report of M/s Rudra Enterprises
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221	A. Panchnama/Visit Report of M/s Ravi Kumar Laminates
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222	A. Panchnama/Visit Report of M/s Empire Traders
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223	A. Panchnama/Visit Report of M/s Vikas Traders
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224	A. Panchnama/Visit Report of M/s K.N. Traders
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227	B. Summons issued to M/s Jay Trading Co.
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232	Panchnama/Visit Report of M/s Shivanju Traders
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233	B. Summons issued to M/s Singh Traders
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234	B. Summons issued to M/s Salasar Enterprises
00-	A. Panchnama/Visit Report of M/s Nitin Trading House
235	B. Summons issued to M/s Nitin Trading House
236	A. Panchnama/Visit Report of M/s Gupta Enterprises
230	B. Summons issued to M/s Gupta Enterprises
237	A. Panchnama/Visit Report of M/s Saraswati Enterprises
-3/	B. Summons issued to M/s Saraswati Enterprises
238	A. Panchnama/Visit Report of M/s Ravi Kumar Suppliers
-0-	B. Summons issued to M/s Ravi Kumar Suppliers
239	A. Panchnama/Visit Report of M/s Chauhan Traders
	B. Summons issued to M/s Chauhan Traders
240	A. Panchnama/Visit Report of M/s Nayak Trading Company
	B. Summons issued to M/s Nayak Trading Company
241	A. Panchnama/Visit Report of M/s Shiva Enterprises
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242	A. Panchnama/Visit Report of M/s K C Laminates B. Summons issued to M/s K C Laminates
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243	B. Summons issued to M/s Chandan Trading Company
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244	B. Summons issued to M/s Rabindra Laminates
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245	B. Summons issued to M/s Manoj Laminates Sales
	A. Panchnama/Visit Report of M/s Vijay Sales
246	B. Summons issued to M/s Vijay Sales
	A. Panchnama/Visit Report of M/s Lavanya Trading Co.
247	B. Summons issued to M/s Lavanya Trading Co.
	A. Panchnama/Visit Report of M/s S.V. Traders
248	B. Summons issued to M/s S.V. Traders
	A. Panchnama/Visit Report of M/s Unique Services
249	B. Summons issued to M/s Unique Services
050	A. Panchnama/Visit Report of M/s Anurag Sales
250	B. Summons issued to M/s Anurag Sales
251	A. Panchnama/Visit Report of M/s Tushar Laminates Sales
-91	B. Summons issued to M/s Tushar Laminates Sales

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252	B. Summons issued to M/s Vikram Sales	
	A. Panchnama/Visit Report of M/s Singha Enterprises	
253 254	B. Summons issued to M/s Singha Enterprises	
	A. Panchnama/Visit Report of M/s Ripu Trading Company	
	B. Summons issued to M/s Ripu Trading Company	
	A. Panchnama/Visit Report of M/s Dev Warapers	
255	B. Summons issued to M/s Dev Warapers	
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256	B. Summons issued to M/s Naresh Sales	
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257	B. Summons issued to M/s Kritika Trading Co.	
	A. Panchnama/Visit Report of M/s Sagar Trading Company	
258	B. Summons issued to M/s Sagar Trading Company	
	A. SCN issued to M/s Prashant Trading Company	
259	B. Summons issued to M/s Prashant Trading Company	
	A. Panchnama/Visit Report of M/s Prashanta Laminates	
260	B. Summons issued to M/s Prashanta Laminates	
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261	B. Summons issued to M/s Tanya Trading Company	
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262	B. Summons issued to M/s Shivam Enterprises	
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263	B. Summons issued to M/s Navnirman Traders	
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266	Panchnama/Visit Report of M/s Kamakhya Trading Co	
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268	A. Panchnama/Visit Report of M/s Choudhary Sales	
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269	A. Panchnama/Visit Report of M/s Dilip Enterprises	
070	B. Summons issued to M/s Dilip Enterprises SCN dated 08.07.2022 M/s D.K. Enterprises	
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271	SCN dated 25.03.2022 M/s Om Sai Trading Company SCN dated 22.06.2022 of M/s Tomar Sales	
272	SCN dated 12.00.2022 of M/s Tolliar Sales SCN dated 11.01.2022 of M/s HR Enterprise	
273	A. SCN & Order of Cancellation of GSTIN of M/s Kansana Enterprises	
274	B. Summons issued to M/s Dilip Enterprises	
275	SCN & Order of Cancellation of GSTIN of M/s Dharmveer Sales	
2/3	A. SCN dated 02.02.2023 of M/s Kumar Traders	
276	B. Summons issued to M/s Kumar Traders	
277	SCN & Order of Cancellation of GSTIN of M/s Rawat Trading Company	
	A. Panchnama/Visit Report of M/s Ahmana Traders	
278	B. Summons issued to M/s Ahmana Traders	
	A. Panchnama/Visit Report of M/s D.K. Enterprises	
279	B. Summons issued to M/s D.K. Enterprises	
a0 -	A. SCN & Order of Cancellation of M/s S9 Trading Co.	
280	B. Summons issued to M/s S9 Trading Co.	
281	SCN & Order dated 18.04.2024 issued to M/s Surya Enterprises	
282	A. SCN & Order of Cancellation of M/s Mask Enterprises	
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285 M/s Gwalior Enterprises Pvt. Ltd., M/s Mantova Enterprises Pvt. Ltd., and M/s Ma		
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286 Statement dated 24.04.2023 of Shri Rajender Singh Negi Prop. M/s R.N. Trading		
287 Statement dated 05.04.2023 of Shri Prabhjeet Singh Prop. M/s S.S. Trading Co.		
288 Statement dated 24.08.2023 of Shri Manish Kumar Jha Prop. M/s Sun Trading Com	pany	
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291 B. Statement dated 12.12.2023 of Ms. Neelima Prop. M/s Neelima Enterprises		
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292 Statement dated 08.02.2022 of Shri Ashish Mittal Prop. M/s Convergent Alliance		
293 Statement dated 05.07.2021 of Shri Vinay Rewari Prop. M/s Katyani Enterprises		
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296 Statement dated 02.08.2022 and 03.08.2022 of Mohd. Ali Akram Khan Prop. M/s In	ra Sales	
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297 Bank Account Statement of Ac No. 1398000100361127 (Ramesh Chander)		
298 Bank Account Statement of Ac No. 10190007921249 (Ganpati Enterprises)		
299 Bank Account Statement of Ac No. 042363700000236 (BPSR Industries Pvt. Ltd.)		
300 Bank Account Statement of Ac No. 1409104000085144 (Kritika Trading Co.)		
301 Bank Account Statement of Ac No. 655401502159 (Catania Enterprises Pvt. Ltd.)		
302 Bank Account Statement of Ac No. 8511594209 (Bhanu Pratap Singh)		
303 KYC & Bank Ac Statement of Ac No. 10200004323104 (Elfed Industries)		
304 KYC & Bank Account Statement of Ac No. 921020041207967 (Avi Foil Traders)		
305 Bank Account Statement of Ac No. 10059321046 (Radical Corporation)		
306 KYC & Bank Ac Statement of Ac No. 34054262972 (Proview Traders)		
307 Bank Account Statement of Ac No. 9871108866 (P B Associates)		
308 Bank Account Statement of Ac No. 2021211930502348 (S.G. Enterprises)		
309 Bank Account Statement of Ac No. 0161000101499389 (Manik Kumar Chatterjee)		
310 KYC & Bank Ac Statement of Ac No. 62439609138 (Jajoria Enterprise)		
311 Bank Account Statement of Ac No. 0109104000223041 (Genius Enterprises)		
312 Bank Account Statement of Ac No. 2414101002071 (Sanjay Trading Co)		
313 Bank Account Statement of Ac No. 671301010050236 (Image India)		
314 Bank Account Statement of Ac No. 50100078957176 (M R Enterprises) 315 E-mail dated 22.05.2024 (Das Enterprises)		
315E-mail dated 22.05.2024 (Das Enterprises)316E-mail dated 22.05.2024 (Vishal Enterprises & Shiv International)		
310E-mail dated 22:05:2024 (Visial Enterprises & Silv International)317Bank Account Statement of Ac No. 6514254755 (Sun Trading Company)		
318 Bank Account Statement of Ac No. 100401002234 (Ridhi Traders)		
319 Bank Account Statement of Ac No. 342405500170 (Ragni Enterprises)		
320 Bank Account Statement of Ac No. 1643010042033 (Mayo Enterprises)		
321 Bank Account Statement of Ac No. 342405000477 (Virgo Enterprises)		
322 Bank Account Statement of Ac No. 5712872266 (Azad Trading)		
323 KYC & Account statement of Ac. No. 26090200010245 (Hari Sales Corporation)		
324 Bank Account Statement of Ac No. 3611952348 (P.C. Supplier Co.)		
325 Screenshot (Winjet Industries)		
326 Mail dated 07.07.2021 of Allahabad Bank, New Rohtak Road Branch		



0.0-	Parts Account Statement of Ac No. = 2000== 20000 (Council Entermines)
327	Bank Account Statement of Ac No. 738905500138 (Ganpati Enterprises)
328	Bank Account Statement of Ac No. 1811211916629780 (Om Trading Company)
329	Bank Account Statement of Ac No. 2419101013146 (Singhania Enterprises)
330	Bank Account Statement of Ac No. 30359416496 (Avtar Trading Co.)
331	Bank Account Statement of Ac No. 50100030215280 (Pal Trading Co.)
332	KYC & Bank Ac Statement of Ac No. 34867008149 (Alston Traders
333	Bank Account Statement of Ac No. 084205500788 (Mehul Enterprises)
334	KYC & Bank Ac Statement of Ac No. 34144144673 (Maurya Enterprises)
335	Screenshot (Kavita Industries)
336	Bank Account Statement of Ac No. 5928101004060 (Sitakanat Trading Co)
337	KYC & Account statement of Ac. No. 26090200010191 (Gupta Enterprises)
338	Bank Account Statement of Ac No. 21830100022933 (Golf Traders)
339	Bank Account Statement of Ac No. 0117073000004711 (Universal Traders)
340	Bank Account Statement of Ac No. 50100128316976 (Jagdamba Enterprises)
341	Bank Account Statement of Ac No. 920020039564541 (Shiv Shakti Enterprises)
342	Bank Account Statement of Ac No. 0117073000004709 (Rajasthan Udyog)
343	Bank Account Statement of Ac No. 112505002422 (Soham Marketing)
344	KYC & Account statement of Ac. No. 760201013000025 (A S Sales)
345	KYC & Account statement of Ac. No. 08000100005798 (Surya Enterprises)
346	KYC & Account statement of Ac. No.10078449859 (Shine International)
347	KYC & Account statement of Ac. No. 26090200010208 (Singh International)
348	Bank Account Statement of Ac No. 50180012013990 (Shree Shyam Trading Company)
349	Bank Account Statement of Ac No. 2414101001762 (Suraj Enterprises)
350	Bank Account Statement of Ac No. 50294467704 (G.S. Trading)
351	KYC & Account statement of Ac. No. 26090200010198 (Jay Trading Co.)
352	KYC & Account statement of Ac. No. 26090200010195 (Salasar Enterprises)
353	Bank Account Statement of Ac No. 1721240414155968 (Zodiac Traders)
354	Bank Account Statement of Ac No. 001451100002734 (Satya Prakash Kumar)
355	Bank Ac Statement of Ac No. 36469928927 (M.K. Trading Co.)
356	Bank Account Statement of Ac No. 2897101003695 (Tripathi Enterprises)
357	KYC & Account statement of Ac. No. 650901011002349 (S K Trading Company)
358	Bank Account Statement of Ac No. 1711210414205575 (Rajeev Trading Co.)
359	Bank Account Statement of Ac No. 3649010000448 (S.A. Enterprises)
360	Bank Account Statement of Ac No. 04672121008171 (Govind Enterprises)
361	Bank Account Statement of Ac No. 086010042014 (G.S. Trading Co.)
362	Bank Account Statement of Ac No. 12732191018650 (R S Enterprises)
363	Bank Ac Statement of Ac No. 36878737787 (Manish Enterprises)
364	KYC & Bank Ac Statement of Ac No. 10170001498116 (Mas Sales Corporation)
365	Bank Account Statement of Ac No. 634201523230 (Polymart Traders)
366	KYC & Account statement of Ac. No. 760201010010222 (Bhagyashree Sales)
367	KYC & Account statement of Ac. No. 767801013000019 (Choudhary Sales)
368	KYC & Account statement of Ac. No. 760201013000020 (Raipur Sales)
369	Bank Account Statement of Ac No. 50200049209022 (Dilip Enterprises)
370	KYC & Bank Account Statement of Ac No 2073201002999 (Asha Industries) Particular Account Statement of Ac No 2073201002999 (Asha Industries)
371	Bank Account Statement of Ac No. 50200045040038 (D.K. Enterprises)
372	Bank Account Statement of Ac No. 50200044916813 (Kansana Enterprises)
373	Bank Account Statement of Ac No. 50200049291651 (Dharmveer Sales)
374	Bank Account Statement of Ac No. 50200039703921 (Ashta Traders)
375	Bank Account Statement of Ac No. 50200049435150 (Kumar Traders)
376	Bank Account Statement of Ac No. 50200045007410 (Ahmana Traders)
377	KYC & Account statement of Ac. No. 760201011003061 (P S Corporation)
378	Bank Account Statement of Ac No. 200010110011957 (Alfa Enterprises)



379	E-mail dated 07.04.2023 (S M Traders)
380	Bank Account Statement of Ac No. 50200045040038 (D.K. Enterprises)
381	Bank Account Statement of Ac No. 0317010100000950 (S9 Trading Co.)
382	E-mail dated 04.12.2023 (Crystal Traders)
383	Bank Account Statement of Ac No. 665001520460 (MAZ Traders)
384	KYC & Account statement of Ac.No.10084001922 (Saraswati Enterprises)
385	Bank Account Statement of Ac No. 623002010006582 (S S Trading Co.)
386	Bank Account Statement of Ac No. 564902010003499 (Elegant Traders)
38 7	Bank Account Statement of Ac No. 1643010042033 (Mayo Enterprises)
388	Bank Account Statement of Ac No. 034863300004039 (Jyoti Traders)
389	Bank Account Statement of Ac No. 034863300004027 (K N Traders)
390	Statement dated 16.06.2021 of Shri Ajay Kumar Tripathi, DGM (Production) of M/s MEPL,
390	Jammu
391	Statement dated 15.06.2021 of Shri Prashant Kumar Singh (Senior DGM (Finance) of M/s
	MEPL, Noida
392	Statement dated 15.06.2021 of Shri Ram Mohan Pandey, AGM of M/s MEPL, Noida
393	Statement dated 15.11.2021 of Shri Arvind Gupta, Promoter Director of M/s MEPL
394	Statement dated 06.12.2021 of Shri Arvind Gupta, Promoter Director of M/s MEPL
395	Statement dated 16.04.2024 of Shri Yogeshwar Singh, Ex-Director of M/s MEPL
396	Statement dated 14.06.2021 of Shri Kapil Dev Sharma, Assistant Manager (Store In-charge
0,	Raw Material) of M/s MEPL, Haridwar
397	Statement dated 15.06.2021 of Shri Sanjeev Kumar, Manager (Commercial) of M/s MEPL,
	Haridwar
398	Statement dated 15.06.2021 of Shri Pradeep Kumar, Deputy General Manager (Production)
	of M/s MEPL, Haridwar
399	Statement dated 14.06.2021 of Shri Rambilas, Deputy Manager (Accounts) of M/s MEPL, Haridwar
	Halluwal
400	
400	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur
400 401	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s
401	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur
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401 402	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi
401	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s
401 402	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager
401 402 403	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi
401 402 403 404 405	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi
401 402 403 404	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow
401 402 403 404 405 406	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s
401 402 403 404 405	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow
401 402 403 404 405 406 407	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow
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401 402 403 404 405 406 407 408	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow
401 402 403 404 405 406 407	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow
401 402 403 404 405 406 407 408	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow
401 402 403 404 405 406 407 408 409 410	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow
401 402 403 404 405 406 407 408 409	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow
401 402 403 404 405 406 407 408 409 410 411	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow
401 402 403 404 405 406 407 408 409 410 411 412	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 14.06.2021 of Shri Anand Sharma, Deputy Manager of M/s MPSPL, Gwalior Statement dated 14.06.2021 of Shri Anand Sharma, Deputy Manager (Dispatch) of M/s MPSPL, Gwalior
401 402 403 404 405 406 407 408 409 410 411 412 413	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 14.06.2021 of Shri Anand Sharma, Deputy Manager of M/s MPSPL, Gwalior Statement dated 14.06.2021 of Shri Anand Sharma, Deputy Manager of M/s MPSPL, Gwalior Statement dated 14.06.2021 of Shri Gagandip Singh Bawa, Ex-Director of M/s MPSPL, Gwalior
401 402 403 404 405 406 407 408 409 410 411 412	Statement dated 15.06.2021 of Shri Pawan Pandey, Junior Engineer of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Sunil Kumar Tiwari, Senior Manager (Commercial) of M/s MEPL, Malanpur Statement dated 15.06.2021 of Shri Punit Kumar Mishra, Senior Account Officer of M/s MSPL, Delhi Statement dated 15.06.2021 & 24.09.2021 of Shri Sushil Kumar Dwivedi, Dispatch Manager of M/s MSPL, Delhi Statement dated 15.11.2021 of Shri Harvinder Singh Matharu, Director of M/s MSPL, Delhi Statement dated 26.04.2022 of Shri Jasmeet Singh, Director of M/s MSPL, Delhi Statement dated 14.06.2021 of Shri Narinder Chopra, Senior Manager (Commercial), of M/s MFSPL, Lucknow Statement dated 14.06.2021, and 13.05.2022 of Shri Nikhil Agnihotri, director of M/s MFSPL, Lucknow Statement dated 07.06.2022 of Shri Sandeep Jain, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 11.05.2022 of Shri Anil Sharma, Ex-Director of M/s Montage Flexipack Sales Pvt. Ltd., Lucknow Statement dated 14.06.2021 of Shri Anand Sharma, Deputy Manager of M/s MPSPL, Gwalior Statement dated 14.06.2021 of Shri Anand Sharma, Deputy Manager (Dispatch) of M/s MPSPL, Gwalior



416	Data Retrieval Panchnama dated 04.01.2022 of Mobile Phone of Shri Shekhar & Shri Sandeep	
417	A. Statement dated 04.01.2022 & 19.01.2022 of Shri Sandeep Kumar	
	B. Printout taken from the data retrieved from mobile phone of Shri Sandeep Kumar	
418	Statement dated 17.01.2022 of Shri Sarang Jhunjhunwala, Employee of Shri Dipanshu Gupta	
410	A. Statement dated 02.05.2023 of Shri Ratan Chand, Director of M/s Dealistix India Pvt. Ltd.	
	B. Tax invoices issued by M/s Dealistix India Pvt. Ltd., to M/s MFPSL, Lucknow and M/s	
419	MSPL, Delhi and bank a/c statement of M/s Dealistix India Pvt. Ltd.	
	(157502000000013)	
420	Tax invoices issued by and bank a/c statement of M/s Dealistix India Pvt. Ltd.	
421	Goods Sale and Purchase Agreement executed between M/s MEPL with M/s MSPL, Delhi;	
	M/s MFSPL, Lucknow and M/s MPSPL, Gwalior	
422	SCN issued to M/s 3RD Rock Multimedia Limited	
423	SCN & Order of demand of M/s Aquawhite Retail India Pvt. Ltd.	
424	SCN issued to M/s Golf Enterprises	
425	SCN issued to M/s MKC Traders	
426	M/s MSPL, Delhi, e-Mail dated 20.10.2023 along with CIRP Order	
42 7	M/s MFSPL, Lucknow, e-Mail dated 19.10.2023 along with CIRP Order	
428	M/s MPSPL, Gwalior, e-Mail dated 20.10.2023 along with CIRP Order	

