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Tax Practitioners' Association, Indore

**TAX NEWS & VIEWS**

January - 2024 | Price ₹ 15



# Living Legends of TPA

Shri Surendra Kumar Sachdeva is a leading Tax Advocate and a pious personality. He was president of the Tax Practitioners' Association almost 50 years ago in 1972 -74 and during his tenure the "Tax Bar library" established at the newly opened office of the Income Tax Appellate Tribunal at Old Palasia. Age is only a number for him, as at 92 he is still active in his office and has dedicated his life to charity and social work.

Born at Sargodha (Pakistan, Punjab) in the year 1932, during partition his family migrated to India, and he pursued law from Holkar College and served with R.D Joshi & Co. as an audit clerk. In July 1955 along with his uncle, he started income tax practice in the name of I.P Sachdeva & Co., later in 1976 he started his own firm SK Sachdeva & Co, which now his son advocate Shri Tribhuvan Sachdeva is looking after.



He recalls those golden days, "Income Tax office was opened for the first time at Indore in the year 1950 with one ITO named Mr. C.M Chakardeo which was under the charge of CIT-Jaipur then on re-organization of state in 1956, Indore came under CIT-Nagpur. When I joined the profession, the office was situated in the building opposite GPO, there were three ITO's at ward A, B & C having Mr. R.L Malhotra (IRS) at A-ward. During those days the only source of knowledge & information were weekly magazines like ITR, Taxman etc. Study circles or series of lectures that are held in the present, were not prevalent at that time. The relationship amongst professional colleagues was very co-ordinal. There was always mutual respect & each helped the other, even while arguing before the ITAT, colleagues used to give each other tips. There used to be an exchange of favorable judgments and even information regarding comparable cases was passed on to each other when requested. The tea stall of "Master" Mela Ram in Chhawani (opposite to Income tax office) was a place where all the counsel gathers during lunch hour, he served tea & butter toast with a smile and his love & affection still roams in our memories.



It is my uncle who introduced me to Bhagwan Sri Sathya Sai Baba in the year 1971 then Shri J.S. Anand, ACIT (Appeal), Indore who was Distt. President of Sri Sathya Sai organization MP inducted as Chairman of Indore Samiti. I wish to acknowledge from the core of my heart that in this profession whatever I had learnt or stood for was because of the love & guidance of my revered uncle Late Shri I.P. Sachdeva during my tenure of working with him from 1955 to 1976".

He was an active member in social organizations like Masonic Lodge and Yeshwant Club. He has two sons (Tribhuvan & Dhruva), daughter Ritoo, wife late Smt. Meera Sachdeva in his family and five brothers and a sister.

His younger brothers CA Shri VK Sachdeva, Adv. Shri Manjit Sachdeva and son Adv. Tribhuvan Sachdeva are also TPA members.

His message to the members is that "There is no shortcut to hard work in the tax profession". We from the Tax Practitioners' Association are honored to have you as member and wish you good health & a long life.

सीनियर्स के प्रोफेशन की यात्रा, उनका ज्ञान, उनके अनुभव,  
उनकी सीख, उनके संस्मरण, उनका संदेश...

**Living Legends** टीपीए का नवीनतम भावनात्मक प्रयास...  
जिसके तहत एसोसिएशन के वरिष्ठतम सदस्यों से होगी मुलाकात...

इसी कड़ी में पहली मुलाकात श्री एस के सचदेवा सा. से...  
यादें...जो हमे प्रेरित भी करेगी और राह भी दिखायेगी ।

## President MESSAGE



Dear Members,

Wish you all a very happy, healthy, wealthy and cheerful New Year 2024!!!

I am incredibly grateful for the trust and belief that you have bestowed upon me. Your unwavering support and confidence in me means so much and I feel honored to lead Team TPA brimming with versatile skills and vibrant energy for the term 2023-25. Your trust inspires me to do my best and to strive for excellence in all my work.

At the outset, in my very first communiqué as President, I would like to mention that we have derived the strength to challenge ourselves and at each stage try to perform better than our glorious past. It's important to acknowledge the effort and time that our cheerful and energetic past President CA Shailendra Singh Solanki & Team TPA of term 2021-23 has put into their work in the last years, we value their contributions and are grateful.

GST Appellate Tribunal(GSTAT) bench at Indore is our first priority, we are heartfully thankful to our beloved Member of Parliament from Indore, Shri Shankar Lawani, for raising his voice in this matter in the Parliament and meeting with the Hon'ble FM from time to time, we are also thankful to Mayor of our cleanest city Indore, Shri Pushyamitra Bhargav, who has put all his efforts at the State Government level to ensure that the GSTAT bench is set up Indore. All the members of the Committee for GST Appellate Tribunal at Indore put in their tireless efforts, Media has highlighted this matter prominently, and our beloved Advocate Sumit Nema Ji has benevolently helped to file a PIL at Indore Bench of Hon'ble High Court in the matter. All these efforts together brought about a blossoming result and the matter moved ahead with Hon'ble Finance Minister's announcement in Parliament about setting up of the GSTAT Bench at Indore. I am sure to hear the official announcement on this matter soon.

A big revamp in important core law with the enactment of Bhartiya Sakshya Adhinyam,2023, Bhartiya Nyay Sanhita,2023 and Bhartiya Nagrik Suraksha Sanhita, 2023 repealing legacy statutes Indian Evidence Act,1872the Criminal Procedure Act,1973 and Indian Penal Code,1860 respectively are going to impact significant changes in Tax matters. Soon with the notification of effective date these become in force, and we need to be proactive to prepare ourselves ahead.

At TPA we are taking some new initiatives:

“Living Legends of TPA” to remember our members and leaders of the past whose hard work at TPA has glorified the association, this month we are commencing with the past president of TPA and a pious personality Respected Shri Surendra Kumar Sachdeva Sir.

In study circles/seminars, we will give a plant sapling to the speaker and guest instead of a flower bouquet.

The month of December started with your overwhelming participation in Annual General Meeting and during the month three study circles meeting organized, two on GST (Annual Returns, RCM on Govt. Services, Rule 86B, DRC01B & DRC01C) where speakers were CA Krishan Garg, CA Palkesh Asawa and CA Ankit Karanpuria and one on Income Tax Matters for Drafting & Pleading in Faceless Assessment and Reassessment by speaker CA Pankaj Shah who covered the subject matter in depth with all practicality in their presentation and healthy Q&A after each SCM by participation of members made them purposeful. GST Helpline for Annual Return set for members where CA Yash Khandelwal, CAMrunal Garg and CA Rajat Dhanuka volunteered actively.

I request all members to contribute their ideas, perspectives and put in efforts to create an inclusive and supportive environment.

I once again wish all a very joyful, eventful, and pleasant new year 2024.

**Dreams, determination, and dedication are the steppingstones to success.**

**So, we dared to dream and have courage to pursue that dream relentlessly.”**

Sincerely Yours,  
**CA Jaiprakash Saraf**

# HINDU LAW: Rights of an illegitimate child



Section 16 of The Hindu Marriage Act, 1955 applies to Legitimacy of children of void and voidable marriages. Section 16(1) says “notwithstanding that a marriage is null and void under section 11, any child of such marriage who would have been legitimate if the marriage had been valid, shall be legitimate.” In other words all children of void / voidable marriages under the act are treated as legitimate hence would be entitled to rights in the property of their parents.”

There are several issues remain in mind about the rights of an illegitimate child in relation to ancestral property, HUF etc. Supreme Court Two member bench in 2011 and Larger bench (after request to Chief Justice of India) in 2023 has finally resolved the matter in the case of

- i. *Revanasiddappa vs. Mallikarjun*(2011) 11 SCC1; and
- ii. *Revanasiddappa vs. Mallikarjun*C.A. No. 2844/2011 Order dated 1st September 2023.

The following issues resolved by SC in relation to rights of an illegitimate child in relation to inheritance to ancestral property:

**Q1.** Whether illegitimate children is entitled to a share in the coparcenary property or whether their share was limited only to the self-acquired property of their parents?

**Answer:** The Court observed that the Act uses the word “property” and had not qualified it with either self-acquired property or ancestral property. It has been kept broad and general. It explained that if they have been declared legitimate, then they cannot be discriminated against and they will be at par with other legitimate children, and be entitled to all the rights in the property of their parents, both self-acquired and

ancestral. The prohibition contained in s. 16(3) will apply to such children only with respect to the property of any person other than their parents. Qua their parents, they can succeed in all properties.

**Q2.** What would be the position of an illegitimate child in HUF property and Hindu Succession act?

**Answer:** The Court examined the matter and the rights of coparceners to succeed to the share of their father in the HUF in light of the Hindu Succession Act, 1956. This could be by way of a Will or by intestate succession. In the case of intestate succession, the provisions of the Hindu Succession Act provide for Class I heirs to succeed to the property of a Hindu male. In this situation, the Court noted that the Hindu Succession Act did not distinguish between legitimate Class I heirs and illegitimate heirs.

However, the Court held that the illegitimate child would not ipso facto become a coparcener in the HUF. He would get a share in his deceased father's HUF share but not directly become a coparcener in the HUF. This is because the HUF property is not the exclusive property of his father. Section 16(3) of the Hindu Marriage Act has an express carve out that a deemed legitimate child cannot succeed to properties of other relatives. To make him a coparcener would violate Section 16(3).

## CONCLUSION

The issue relating to HUF rights of illegitimate children has reached finality. The Court has aimed for a balancing approach by protecting the rights of the deemed legitimate child on the one hand and also preserving the rights of other HUF coparceners on the other hand.

# INCOME TAX LATEST DECISIONS



## HIGH COURT

**NITIN NEMA V. PCIT [2023] 155 TAXMANN.COM 276 (MADHYA PRADESH)** S. 148 – Reassessment - Where revenue had misinterpreted gross receipt of sale consideration of 16 scooters as income chargeable to tax and assessee had clearly explained that amount was total sale consideration and not income chargeable to tax; reassessment proceedings against assessee on ground that amount received by assessee on sale of 16 scooters had escaped assessment were to be quashed and set aside.

**CIT VS. S. KUMAR TYRES MANUFACTURING CO. LTD [2023] 147 TAXMANN.COM 49 (MADHYA PRADESH)** 271(1)© – Penalty - Where assessee company disclosed compensation received on termination of an agreement as capital receipt instead of revenue receipt on basis of opinion given by its Chartered Accountant, such action would not amount to deliberate attempt to conceal particular of income or furnishing any inaccurate particulars thereof, hence, it would not render assessee guilty of any violation resulting in imposition of penalty under section 271(1)(c)

**RADHESHYAM PATEL V. UOI [2023] 148 TAXMANN.COM 333 (MADHYA PRADESH)** Tribunal was bound to give proper decision on question of fact as well as law on merits and it could not dismiss an appeal owing to default of appearance.

**PCIT VS. REGENT BEERS & WINES LTD. [2023] 155 TAXMANN.COM 544 (MADHYA PRADESH)** Where assessee maintained day to day transactions in tally in name of 'A' and there was difference between in figures of capital and loans as per tally data of 'A' and audited account books of assessee, since case of assessee was of suppression of liability in audited books of account vis-a-vis parallel set of account books maintained in name of 'A', same could not be subject matter of addition under section 69/69A.

**CIT vs. President Seth Malukchand Hirachand Digambar Jain Goth Bees Panthi Mandir Dharmik Avam Paramarthik Trust, Barnagar (MadhyaPradesh) [2023] 154 taxmann.com 537 (Madhya Pradesh):** Where there was nothing substantive or serious to doubt nature of trust being charitable, Commissioner was not justified in rejecting application for registration on basis that assessee had not shown reason for not filing application for registration within one year from prescribed date.

**Meet Lalwani Legal Heir of Late Mrs. Amita Lalwani v/s. ITO 2023 (11) TMI 1196 - MADHYA PRADESH HIGH COURT:** The notice issued in the name of the dead person is unenforceable in the eyes of law. The notice issued to a dead person for reopening of assessment of a dead person is null and void. The Court held that the notice and all consequential proceedings arising there from in the name of the deceased assessee are not sustainable.



## ITAT DECISIONS

**DCIT V. ARVIND JOSHI [2023] 157 TAXMANN.COM 174 (INDORE - TRIB.)** Where assessee was deprived of information/evidence which was considered by revenue while passing assessment order which was in violation of principle of natural justice, matter was to be remanded back to Assessing Officer to allow assessee to cross examine witnesses whose statements were recorded and also give opportunity to assessee to revert and meet reports and other evidences collected by Assessing Officer and used against assessee in assessment proceedings but were supplied only after assessment was completed.

**ITO V. RISHI CONSTRUCTION [2023] 157 TAXMANN.COM 79 (INDORE - TRIB.)** Where assessee firm entered into unregistered agreement with 'G' for sale of land who further sold said land to another person and entire sale consideration from ultimate buyer was received by assessee only who after keeping sale consideration amount ought to be received by it from 'G' passed excess amount to 'G', 'G' could not be treated as owner of land on basis of impugned unregistered agreement and, therefore, Assessing Officer was justified in making addition on account of entire sale consideration received from ultimate buyer in hands of assessee.

**LALIT PREMCHANDANI V. ITO [2023] 155 TAXMANN.COM 416 (INDORE - TRIB.)** Where AO on basis of an information concluded that assessee had paid unaccounted on-money in cash for purchase of property and he made addition under section 69, since document on basis of which reassessment was initiated clearly showed date of payment as 5-11-2013 which fell within previous year 2013-14 relevant to assessment year 2014-15 and, thus, there was no cash-payment during previous year 2012-13 relevant to concerned assessment year 2013-14, addition made by AO was patently wrong and unsustainable.

**ACIT VS. MANISH KEDIA [2023] 153 TAXMANN.COM 202 (INDORE - TRIB.)** Limitation period of 6 months for filing Miscellaneous Application (MA) as per section 254(2) was to be computed with reference to actual receipt of order.

**HUKUMCHAND CHOUDHARY V. ITO [2023] 152 TAXMANN.COM 334 (INDORE - TRIB.)** Where assessee during assessment year 2011-12, sold his 1/4th share of ancestral urban agricultural land co-owned by his other family members vide an agreement and out of sale proceeds received he purchased new agricultural land in rural area and made investment in construction of his house, since execution of agreement related to purchase of land and possession of land was in 2011-12 only, registration of sale deed in April 2011 would not debar assessee when assessee had claimed exemption under section 54F and section 54B in assessment year 2011-12.

**SHAKTI PUMPS (INDIA) LIMITED [TS-241-ITAT-2023 (IND)] (INDORE TRIB.)** During assessment proceeding, the Assessee explained the expenses incurred in DTA unit and SEZ unit which was not countered by the Revenue and the Revenue only speculated that the expenses of SEZ unit have been lowered without bringing any material on record, applied a single, uniform, ad hoc allocation ratio of 60:40 to various type of expenses, Revenue took 'material consumption ratio' as a basis for allocation of all expenses without showing any rationale, Revenue did not reject the books of account by invoking Section 145 and nowhere doubted its correctness or completeness; ITAT observes that CIT(A) was right in gaining support from coordinate bench order passed in challenge to revisionary proceedings as several factors on merit of the case were taken into consideration.

# IMPACT OF END OF LIBOR ERA ON TRANSFER PRICING SAFE HARBOUR RULES IN INDIA



CA. Chaitanya Maheshwari

Recently the CBDT issued the much-awaited Notification No. 104/ 2023 (the Notification) dated 19th December 2023 which mainly includes, along with other the amendments, the amended safe harbour interest rates relating to the advancing of intra-group loans (IGL) due to cessation of LIBOR. As the earlier Transfer Pricing (TP) Safe Harbour Rules (SHR) were based on LIBOR, so now the amended rates are based on the respective reference rates of the foreign currency in which the IGL transaction have been undertaken. Moreover, since the rates were based on only CRISIL credit ratings in earlier SHR the same concept have been amended to include credit ratings of all the SEBI registered and RBI accredited credit rating agencies.

Following are the amended SHR pertaining to said IGL:

| Sl. No. amended of Rule 10TD(2A) | Currency in which IGL advanced as per Rule 10TC(iv) | Prescribed Interest Rates   |
|----------------------------------|---|---|
| 1                                | In Indian Rupees (INR)                              | <p>Interest rate <math>\geq</math> one-year marginal cost of funds lending rate of SBI as on 1st April of the relevant PY plus:</p> <p>(i) 1.75%, where the AE has credit rating between AAA to A or its equivalent;</p> <p>(ii) 3.25%, where the AE has credit rating of BBB-, BBB or BBB+ or its equivalent;</p> <p>(iii) 4.75%, where the AE has credit rating between BB to B or its equivalent;</p> <p>(iv) 6.25%, where the AE has credit rating between C to D or its equivalent; or</p> <p>(v) 4.25%, where credit rating of the AE is not available and the amount of loan advanced to the AE including loans to all AEs (in INR) <math>\leq</math> INR 100 crore in aggregate as on 31st March of the relevant PY.</p>  |
| 2.                               | In foreign currency                                 | <p>Interest Rate <math>\geq</math> the reference rate of the relevant foreign currency as on 30th September of the relevant PY plus:</p> <p>(a) If amount of loan advanced to the AE including loans to all AEs <math>\leq</math> sum equivalent to INR 250 cores in the aggregate as on 31st March of the relevant PY:</p> <p>1) 1.50%, where the AE has credit rating of AAA, AA+, AA, AA-, A+, A, A- or equivalent;</p> <p>2) 3.00%, where the AE has credit rating of BBB+, BBB, BBB- or equivalent;</p> <p>3) 4.00%, where the AE has credit rating of BB+, BB, BB-, B+, B, B-, C+, C, C-, D or equivalent or where the credit rating of the AE is not available.</p> <p>(b) If amount of loan advanced to the AE including loans to all AEs <math>&gt;</math> sum equivalent to INR 250 cores in the aggregate as on 31st March of the relevant PY:</p> <p>1) 1.50%, where the AE has a credit rating of AAA, AA+, AA, AA-, A+, A, A- or equivalent;</p> <p>2) 3.00%, where the AE has credit rating of BBB+, BBB, BBB- or equivalent;</p> <p>3) 4.50%, where the AE has a credit rating of BB+, BB, BB-, B+, B, B- or equivalent;</p> <p>4) 6.00%, where the AE has credit rating of C+, C, C-, D or equivalent or where the credit rating of the AE is not available.</p> |

These reference rates have been defined based on respective foreign currency in which such IGL is advanced as follows:

| Currency of IGL | Reference Rate for respective Foreign currency IGL advanced                     | Administering or Benchmarking Authority |
|-----------------|---|---|
| USD             | 6-month Term Secured Overnight Funding Rate (SOFR) plus 45 basis points         | Chicago Mercantile Exchange (CME)       |
| Euro            | 6-month Euro Interbank Offer Rate (EURIBOR)                                     | European Money Markets Institute        |
| GBP             | 6-month Term Sterling Overnight Index Average (SONIA) plus 30 basis points      | ICE Benchmark Administration/Refinitiv  |
| JPY             | 6-month Tokyo Term Risk Free Rate (TORF) plus 10 basis points                   | QUICK Benchmarks Inc                    |
| AUD             | 6-month Bank Bill Swap Rates (BBSW  | Australian Securities Exchange          |
| SGD             | 6-month Compounded Singapore Overnight Rate Average (SORA) plus 45 basis points | Monetary Authority of Singapore         |

Here, "Credit rating" means credit rating assigned to the AE by SEBI registered and RBI accredited Credit rating agency applicable for relevant PY:

- i. When only one credit rating of the AE is there then only this one credit rating to be considered for SHR purposes; or
- ii. When more than one credit rating of the AE is there then the least credit rating amongst all to be considered as credit rating for SHR purposes.

**All the amendments as per the said Notification are applicable w.e.f. 01st April 2024 i.e. AY 2024-25 or PY 2023-24.**

#### ABBREVIATIONS

|               |  |
|---------------|--|
| Rule or Rules | The Income Tax Rules, 1962                 |
| AE            | Associated Enterprise                      |
| AY            | Assessment Year                            |
| PY            | Previous Year                              |
| SEBI          | The Securities and Exchange Board of India |
| RBI           | The Reserve Bank of India                  |
| >             | Greater Than                               |
| <             | Less Than                                  |
| =             | Equal to                                   |
| LIBOR         | London Inter-Bank Offer Rate               |
| SBI           | State Bank of India                        |



# GST – CASE LAW DIGEST



## **1.M/s Att Sys India Pvt. Ltd. Extex Tele Pvt. Ltd. Consortium Vs Commissioner of GST [W.P. (C) 14494/2023]**

Cancellation of GST Registration without granting any hearing and proper reasoning is not sustainable. The Hon'ble Delhi High Court allowed the petition and directed the department to restore the GST registration of the petitioner.

## **2.M/s Chukkath Krishnan Praveen Vs State of Kerala [W.P. (C) No.41219 of 2023]**

The rectification in return shall be allowed when Input Tax Credit accounted in Form GSTR-3B as IGST credit instead of CGST credit and SGST credit erroneously. The Hon'ble Kerala High Court allowed the writ petition and directed that the rectification in the return shall be allowed.

## **3.The Commercial Tax Officer Vs M/s Suzlon Energy Limited and Others [W.P. (C) No.10852 & 10855 of 2021]**

The taxpayer is entitled for refund under Inverted Duty Structure even when the tax on input is erroneously charged at a higher rate by the supplier. The Hon'ble Madras High Court reaffirming the decision of the Assistant Commissioner (Appeals), dismissed the writ petition filed by the department.

## **4.Kavin HP Gas GraminVitrak Vs The Commissioner of Commercial Taxes [W.P.(MD).Nos.7173 and 7174 of 2023 and W.M.P.(MD)Nos.6764 and 6765 of 2023]**

as per Section 38 of the CGST Act, 2017 and Rule 60 of the CGST Rules, 2017, ITC should be claimed through GSTR-2, but the GSTN had not provided the facility for GSTR-2. Since GSTR-2 was not available, the court concluded that the petitioner cannot be expected to file the form electronically, and the initiation of proceedings based on this ground is not sustainable. The Hon'ble Madras High Court allowed the writ and directed the respondents to permit the petitioner to file manual returns, accept belated returns if otherwise in order, and allow the claim of ITC.

## **5. Pepsico India Holdings (P.) Ltd. v. Union of India [WP(C) NO. 6960 OF 2023]**

The department issued a demand-cum-show cause notice under section 73(1) alleging that the petitioner is liable to reverse an un-reconciled ITC amount reflecting in GSTR-9C. The petitioner argued in a writ petition that the mandatory conditions precedent for invoking section 73(1) were not met in this case.

The Hon'ble Gauhati High Court allowed the writ petition ordering that the essential condition of issuing Form GST ASMT-10 to the petitioner was not fulfilled. The issuance of the demand-cum-show cause notice under section 73(1) by the proper officer lacked compliance with mandatory conditions, specifically those outlined in section 61 read with rule 99.

## **6. Pratima Tyagi v. Commissioner of GST [W.P.(C) NO. 16016 OF 2023]**

The assessee closed down her business and applied for the cancellation of GST registration on 11-11-2019. The said application was not processed and instead the proper officer issued a show cause notice proposing to cancel the GST registration due to non-filing of returns for a continuous period of six months and cancelled the registration with retrospective date. The show cause notice lacked details such as the appointed date and time for a hearing.

The Hon'ble Delhi High Court allowed the petition and held that impugned order cancelling the GST registration was deemed unjust. There was no reason for cancellation during periods when the petitioner was compliant. The cancellation should have taken effect from 11-11-2019.

# CROSSWORD PUZZLE



## ACROSS

1. Notice under section 148 for purpose of section 147 is for \_\_\_\_\_.
3. \_\_\_\_\_ results from incidence of tax on tax.
6. As per Article 265 of \_\_\_\_\_, no shall be levied or collected except by authority of law.
7. An addition cannot be made on mere suspicion, assessing officer have to make independent \_\_\_\_\_ of his own.
8. Goods and Service Tax is levied on \_\_\_\_\_ of goods or services.
9. Recently, Hon'ble Supreme Court exercised inherent power under Article 142 of the Constitution of India in the matter of \_\_\_\_\_ relating to reassessment notices issued under the Income Tax Act, 1961.

## DOWN

1. If an amendment is classificatory nature, then it would have \_\_\_\_\_ effect.
2. An appeal is admitted in High Court on \_\_\_\_\_ question of law.
4. In order to make addition under section 68 \_\_\_\_\_ must be found in the books of account of which assessee does not offer any explanation.
5. Identity, Credit Worthiness and \_\_\_\_\_ are considered as three limbs under Section 68 of Income Tax Act.

|                |              |              |  |   |              |              |              |   |   |              |
|----------------|--------------|--------------|--|---|--------------|--------------|--------------|---|---|--------------|
| <sup>1</sup> R |              |              |  |   |              | <sup>2</sup> | M            | N |   |              |
|                |              |              |  |   |              |              |              |   |   |              |
|                |              |              |  |   |              | B            |              |   |   |              |
|                | <sup>3</sup> | A            |  |   |              |              | <sup>4</sup> | A | I | <sup>5</sup> |
|                |              |              |  |   |              |              |              |   |   |              |
|                |              |              |  |   |              | A            | E            |   |   |              |
|                |              |              |  |   |              |              |              |   |   | U            |
|                |              |              |  |   |              |              |              |   |   |              |
| C              | <sup>6</sup> |              |  | S |              | I            |              | T |   |              |
|                |              |              |  |   |              |              |              |   |   | E            |
|                |              |              |  |   |              |              |              |   |   |              |
| V              |              |              |  |   |              |              |              |   |   |              |
|                |              |              |  |   | <sup>7</sup> | Q            |              | Y |   | S            |
|                |              | <sup>8</sup> |  | P |              |              | Y            |   |   |              |
|                |              |              |  |   |              |              |              |   |   |              |
| <sup>9</sup>   |              | H            |  |   |              |              | G            |   |   | A            |

### ट्रस्ट का गठन : समस्याएं व सुझाव

पब्लिक चैरिटेबल ट्रस्ट के गठन में लग रहे लंबे समय व अन्य प्रक्रियाओं के संदर्भ में इंदौर कलेक्टर को सुझाव पत्र व ज्ञापन दिया जाना है।

इस संदर्भ में टीपीए के सदस्यों के कोई सुझाव या शिकायत हो तो तो वे कृपया निम्न मोबाइल न. पर संपर्क कर सकते हैं :

**CA. J P SARAF**  
9425059619

**CA. MANOJ P GUPTA**  
9827026540

### Invitation for application for Valuer & Chartered Engineer for M.P. & Chattisgarh by Custom department

Customs Commissionerate has invited application for Valuer for Gold, Jewellery, Precious stones and Chartered Engineer for machinery & other capital goods for M.P. and Chattisgarh. Eligibility Criteria and form is available on TPA website. Link below.

Last date is 25/01/2024. Public notice no 13/2023-24 dated 26/12/2023

<https://tpaindore.com/pdf/notice-jan-23.pdf>

# GLIMPSES OF TPA ACTIVITIES



Study Circle Meeting on GST Annual Returns



SCM on GST Rule 86B



TPA AGM



SCM on Income Tax -  
speaker CA. Pankaj Shah



Team TPA with ICAI President &  
Vice President

# NEW TEAM TPA



**New dreams.... New vision....  
New initiatives....!!!  
#2023-25**

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