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"Every Passing Minute is Another Chance to Turn it Around"

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President's Communique

Dear Members,

Investment in knowledge pays the best interest, We at Malad Chamber understand the importance of knowledge sharing and how it help members. Over the years, we have continuously engaged our members in knowledge sharing and learning. This cannot be stopped by a global pandemic, instead only helped us to move towards a digital platform.

With a view to make the assessment procedure more transparent and non partial, the Government has introduced the concept of faceless assessment — "Honouring the Honest."

With a view to assist members in understanding the concept of faceless assessment under direct taxes, we conducted 6th Study Circle Meeting on 27th Sept., 2020. The Study Circle was addressed by Dr. Bharat Vasani, CA Khyati Vasani and CA Reema Shah, wherein we learnt how traditional ways of assessment are replaced by faceless assessments including CIT Appeals.

The 7th Study Circle Meeting held on 2nd Oct., 2020 was another successful event by two eminent faculties CA Haridas Bhat on issues in Tax Audit and our own member of CA Ketan Vajani on issues in TCS recent developments.

In both the study circle meetings the response of members was tremendous and all the learned faculties were articulate who deserves all the credit for success of study circle.

I would take this opportunity to thank them,

• Dr. Bharat Vasani • CA Khyati Vasani • CA Reema Shah • CA Haridas Bhat • CA Ketan Vajani

The 2nd Managing committee meeting was held on 1st Oct., 2020, wherein almost all managing committee members attended on zoom and had fruitful discussion including review of half yearly accounts of MCTC.

The concept of invoicing introduced for organisation with turnover more than ₹ 500 cr from 1st October 2020 is a major step towards digital accounting in business and as professional we need to quickly adapt the new concept and help business in adopting the same.

I shall conclude with the great words of Mahatma Gandhi, Father of our nation as we celebrated his 151th Birthday anniversary on 2nd Oct., 2020, "Live as if you were to die tomorrow, learn as if you were to live forever."

Wish you all Happy Dussera

Take Care, Stay Safe and Remain Healthy.

With Warm Regards,

Thank You!

CA M. D. Prajapati

President

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Life Membership Fees ₹ 2,500

CONSEQUENCES OF NON-REGISTRATION UNDER GST

Compiled by CA Bhavin Mehta



Whether ITC can be claimed on input services and capital goods received prior to GST registration used in provision of taxable output supply.

The relevant provisions pertaining to Input Tax Credit is examined below:

The definition of “input tax” as prescribed in section 2(62) is reproduced below:

“(62) “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-section (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 Service Tax Act;
- (d) the tax payable under the provisions of sub-section (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-section (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.”

The taxes paid by the registered person including tax referred to in clause (a) to (e) above, will qualify as input tax. For unregistered person the taxes so paid will not qualify as input tax. However, this does not mean that at the time of payment of such taxes, it is mandatory for the person to be registered. The taxes so paid during unregistered period would qualify as input tax as and when the person obtains registration.

Sub-section (1) of Section 16 of CGST Act is reproduced below:

“(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 his which are used or intended to be used in the course of furtherance of his business and the said amount shall be credited to the electronic credit ledger of such person.”

The above provision entitles the registered person to claim the ITC on goods or services or both which are used or intended to be used in the course of furtherance of his business. Registration is mandatory for taking the ITC but there is no pre-requisite condition that at the time of receipt of goods or services or both, the recipient should be registered. There is no provision which specifically mandates requirement of registration at the time of procurement of goods or services or both.

Clause (a) of sub-section (2) of section 16 provides, “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, 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”. The condition under clause (a) provides that the person should be registered and he should have prescribed tax invoice, otherwise he cannot claim the ITC. The condition requires that registered person should have tax invoice to claim the credit. However, this does not mean that at the time of procurement of goods or services or both, the person should be registered.

It may be noted that registration under GST is mandatory where a supplier makes a taxable supply of goods or services, if his aggregate turnover in a financial year exceeds specified limit. However, for procurement of goods or services or both, the person may not be registered.

The special circumstances prescribed in section 18(1) of the CGST Act allows ITC on inputs held in stock and inputs contained in semi-finished goods and finished goods on the day immediately preceding the date on which he becomes liable to pay tax. Does this mean prior to registration ITC on input services and capital goods i.e. other than on stock of raw-material, semi-finished goods and finished goods, would not be entitled? In the opinion of author unless restriction is explicitly provided in the statute ITC on input service availed prior to registration cannot be restricted.

Manner specified in section 49: The manner of availing ITC is provided in section 49. The input tax credit shall be claimed in the return of a registered person and shall be credited to electronic credit ledger. The input tax credit available in electronic credit ledger can be utilized for payment of IGST, CGST, SGST, in manner provided in sub-section (5).

Condition and restrictions: It may be noted that the rules prescribing “conditions and restrictions” have limited power to prescribe the procedure for availing the credit. Rules are made by the prescribed authority, while Act is enacted by the Legislature; hence rules are subservient to the Act and cannot override the Act. Rules do not have independent power to deny the credit, which is otherwise granted under the statutory provision. Some of relevant rules on the subject matter is examined below.

Rule 36 – As discussed above the registered person shall avail the ITC on the basis of invoice issued by supplier of goods or services or both in accordance with section 31. The condition as prescribed is that registered person should have tax invoice.

Rule 46 – prescribes the particulars of tax invoice. Clause (d) of rule 46 provides for “name, address and Goods and Service Tax Identification Number or Unique Identity Number, if registered, of the recipient”. The GSTIN of recipient should be mentioned in the tax invoice if recipient is registered, otherwise GSTIN of recipient is not required. This does not mean that tax invoice without recipient registration number (who was not registered at the time of procurement of supply) is not eligible for credit.

Judicial Rulings

I. Under Service Tax Regime

1. In respect of claim of refund of pre-registration credit by the appellant the Hon'ble Karnataka High Court in ***mPortal India Wireless Solutions P. Ltd. v. C.S.T., Bangalore, {2012 (27) S.T.R. 134 (Kar.)***, held as under:
 7. Insofar as requirement of registration with the department as a condition precedent for claiming Cenvat credit is concerned, learned counsel appearing for both parties were unable to point out any provision in the Cenvat Credit Rules which impose such restriction. In the absence of a statutory provision which prescribes that registration is mandatory and that if such a registration is not made the assessee is not entitled to the benefit of refund, the three authorities committed a serious error in rejecting the claim for refund on the ground which is not existence in law. Therefore, said finding recorded by the Tribunal as well as by the lower authorities cannot be sustained. Accordingly, it is set aside.
2. In ***Commr. of G.S.T. & C.Ex., Chennai v. Flextronics Technologies (I) Pvt. Ltd. {2019 (366) E.L.T. 340 (Tri.-Chennai)*** relying on mPortal India Wireless (supra) decision, Chennai Tribunal held that the assessee is eligible for credit before registration of the premises.

3. The Mumbai Tribunal in the case of **Ducon Technologies (India) P. Ltd. v. Commissioner of Central Excise, Thane** {(2018) 95 taxmann.com 183 (Mum. – CESTAT)} relying on mPortal Wireless Solutions (supra) held the gap between the receipt of the service and the registration is not of such significance as to disallow availment.

II. Advance Authority Ruling under GST – Against Applicant

4. In **Knowlarity Communications Pvt. Ltd.** {2019 (31) G.S.T.L. 174 (A.A.R. – GST)}, the Karnataka Advance Ruling Authority has held that goods or services or both received before the effective date of registration, the ITC on such goods or services or both is not entitled.

In the premises of above analysis, in the opinion of author, GST paid on input services and capital goods received prior to GST registration would be entitled to ITC subject to the conditions that such goods and services are used in the course or furtherance of business for provision of taxable outward supply.



JUDICIAL JUDGMENTS

Compiled by CA Rupal Shah

Pr. CIT vs. Sumukha Synthetics, Madras HC. [2020] 119 taxmann.com 234, 8 September 2020



Cash payments made to job workers due to attachment of bank account were eligible for exemption under rule 6DD thus no disallowance under S. 40A(3).

Facts of the case:

Assessee had been declared as a sick industry and Punjab National Bank (PNB) was appointed as an operating agency. PNB had directed M/s. SLM to immediately close their account with the State Bank of India and all transactions should be routed through their account in PNB. Assessee had affected cash payments of ₹ 3.06 crores to its job worker to avoid the attachment of the bank account at the instance of the Employees State Insurance Corporation, Madurai.

Assessment was completed u/s. 143(3) with no disallowances. Assessment revised u/s. 263 to disallow ₹ 61.32 Lakhs being 20% of payment made to a job worker in cash. First appeal before CIT(A) was dismissed. On second appeal, ITAT referred the matter back to AO to examine applicability of exemption under rule 6DD and pass fresh assessment order.

In the fresh assessment order, same disallowance was maintained. Again CIT(A) dismissed assessee's contentions whereas ITAT allowed these expenses observing that these cash payments were eligible for exemption of Rule 6DD.

ITAT placed reliance on the Supreme court decision in case of **Attar Singh Gurmukh Singh v. ITO** [1991] 191 ITR 667 where it is held that where the payment is genuine there cannot be denial of deduction of genuine and bonafide business expenditure merely because the assessee could not make the payment as provided under section 40A(3) of the Act

Further in light of decision of Madras HC in **CIT v. Chrome Leather Co. (P.) Ltd.** [(1999) 235 ITR 708], it is argued that Rule 6DD of the Rules merely sets out the circumstances under which the assessee can claim exemption provided under section 40A(3) and it is illustrative and not exhaustive.

On appeal by Revenue, the High Court observed as below:

The legal principle that emerges is that Revenue cannot dictate as to how the assessee should carry on his business. In terms of the first proviso to S. 40A(3A), assessee has to set out the circumstances which led to payment in cash in excess of the permissible limits and this explanation needs to be tested to the satisfaction of AO.

The fact that the payee was identifiable and not a fictitious person would go to show the bonafides of the transaction and this is what is required to be considered from the angle of a commercially expedient and prudent business house.

Decision of the Tribunal is upheld.

Director of Income Tax (International Taxation) v. Jeans Knit (P.) Ltd. Karnataka HC, [2020] 119 taxmann.com 305, 10 September 2020

Quality checking fees paid to a non-resident company is not fees for technical services (FTS).

Facts of the case:

Assessee is 100% EOU in garments. It is required to import accessories from Europe and other countries. Assessee had engaged a non-resident company to render various services at the time of import such as inspection of fabrics, timely dispatch of material etc. Assessee company paid 12.5% of import value as charges to this non-resident company. During the relevant AY, payments were made without any deduction of withholding tax.

During assessment AO held that the service of non-resident company has to be treated as technical services and are covered under S. 9(i)(vii). Since the assessee failed to deduct tax, liability with interest was determined at ₹ 1.73 crores.

Assessee contended that under the agreement the non-resident company had no role in selecting samples, design or colour, but it acts only as commission agent. It is also pointed out that all the documents were supplied before the Assessing Officer and all the correspondences were produced before the CIT (A). However, CIT(A) upheld the disallowances.

On second appeal ITAT observed that:

Assessee in consultation with the exporters identifies the manufacturers as well as the quality and price of the material to be imported. The non-resident company is not involved either in identification of the exporter or in selecting the material, its quality and negotiating the price. Under the agreement, the non-resident company is required to co-ordinate with the suppliers, so that goods are shipped on time and to make physical inspection to see if it resembles the quality specified by the assessee.

For rendering aforesaid service, no technical knowledge is required. Therefore, the same would not fall within the services contemplated under section 9(1)(vii) of the Act and no TDS is liable to be deducted.

Consequently, the assessee cannot be regarded as an assessee in default and no TDS is required to be deducted.

■ ■ ■

GST PE CHARCHA

Compiled by Monarch Bhatt, Advocate

(Partner at FairLaw Consultancy)



1. GSTR 9 & GSTR 9C:

1.1 The due date for filing of GSTR-9 and GSTR-9C for the financial has been extended for a short period of one month from 30-09-2020 to 31-10-2020.

(Reference Notification Number 69/2020 – Central Tax dated 30-09-2020)

1.2 The clarifications have been provided by issuance of press release, whereby it states that while filing annual return for the period 2018-2019 it shall include the value pertaining to 2018-2019 only in table 4, 5, 6 and 7 of the annual return. However, in auto populated details it is including the value pertaining to 2017-2018 as well which is to be excluded by the assessee.

Example: While filing GSTR 3B for the period July 2017 to March 2018 assessee had not shown the value of INR 100 on which tax was paid in the month of September 2018 which was pertaining to 2017-2018. Therefore, INR 100 was added in 2017-2018 annual return under table 10. Hence, while filing GSTR 9 for the period 2018-2019 though auto populated details include INR 100 but it is not required to be taken into consideration while filing GSTR 9 and it is to be excluded as it is not pertaining to 2018-2019. The same is also applicable for reporting of details under table 5 as well as reporting of input tax credit under table 6 and 7.

Press release further clarifies that if assessee has already filed their return and shown such value again while filing GSTR 9 for the period 2018-2019, no adverse view will be taken against such assessee.

(Reference Press Release dated 09-10-2020 by PIB Delhi - Ministry of Finance)

2. **Payment of interest on net cash liability:**

The story of interest became more interesting from 10-02-2020 where number of tweets were made by CBIC and instructions were issued by the CBIC for recovery of interest on gross tax liability where, as per the system calculated report such interest amount was around 46,000 crores. The number of show cause notices were also issued for recovery of interest on gross tax liability without reducing the input tax credit available with the assessee.

Telangana High Court in the case of ***Mega Engineering & Infrastructure Limited Versus Commissioner of C. T., Hyderabad*** reported in 2019-TIOL-893-HC-TELANGANA-GST held that interest is payable on the gross tax liability without reducing the ITC. Madras High Court's in the case of ***Refex Industries Ltd.*** reported in ***2020-TIOL-358-HC-MAD-GST*** held that interest is

payable only on the net tax liability after reducing the input tax credit. Therefore, the court had pronounced different views.

Recently, by issuance of notification number No. 63/2020-Central Tax dated 25-08-2020, section 50 has been amended vide section 100 of the Finance (No. 2) Act, 2019 to provide for charging of interest only on the net cash tax liability which has come into effect from 01-09-2020. However, **press release** has been issued on **26-08-2020 by PIB Delhi - Ministry of Finance** clarifying that interest will be recovered only on the net cash tax liability even for the prior period. Further, Mumbai High Court has taken a note of all these amendment and press release as well as instructions issued by CBIC in the case of **Royal Chains Pvt. Ltd.** reported in **2020-TIOL-1695-HC-MUM-GST** and held that interest is payable only on the net tax cash liability even for the period from 01-07-2017 to 31-08-2020 i.e., prior to implementation of amendment to section 50. Hence, it is settled position that since from the introduction of GST, interest is payable only on the net tax cash liability after reducing the input tax credit available with the assessee.

3. Waiver or Reduction of late fees on filing of GSTR-4 by composition dealer:

Return under Form GSTR-4 is required to be filed by the assessee who have opted for composition levy, which is to be filed on quarterly basis. The late fees for filing of return under Form GSTR 4 has been completely waived or it has been reduced for the period July 2017 to March 2020, if it has been filed during the period 22-09-2020 to 31-10-2020. The benefit of reduction or waiver of late fees has been explained below:

Particulars	Benefit if GSTR 4 filed between 22-09-2020 to 31-10-2020
Tax Payable under GSTR 4 is "NIL"	100% waiver from late fees
Other than "NIL" Tax payable	Maximum late fees ₹ 500/- (₹ 250 CGST + ₹ 250 SGST)

(Reference Notification Number 67/2020 – Central Tax dated 21.09.2020)

4. Reduction of late fees on filing of GSTR-10 i.e. Final Return:

The Notification number 68/2020 – Central Tax dated 21-09-2020 has been issued, whereby late fees for filing of GSTR-10 has been capped at INR 250/-. It is to be noted that Form GSTR-10 is required to be filed by the assessee after surrender of their registration, which is a final return and initially it was not made available on the portal. Therefore, those assessee who have made an application for surrender of their registration but return under form GSTR-10 was not filed can file their return during the period 22-09-2020 to 31-12-2020, whereby effectively maximum late fees for delayed filing of GSTR-10 would be INR 500/-. (INR 250/- under CGST + INR 250/- under SGST). The benefit of reduction of late fees can also be availed, if registration has been cancelled by the department and assessee does not want to revoke their registration.

(Reference Notification Number 68/2020 – Central Tax dated 21-09-2020)

5. **E-Invoice:**

5.1 The provisions for issuance of E-invoicing has been made applicable to all the assessee whose aggregate turnover is above 500 crores in any preceding financial year from 2017-2018. Hence, assessee needs to check their aggregate turnover in 2017-2018 (including the period April 2017 to June 2017), 2018-2019 and 2019-2020 and in any of these financial years their turnover is above 500 crores, they are required to follow the provisions of issuance of E-invoicing. Such assessee shall also issue E-invoice for supply of goods or service or both to a registered person as well as E-invoice shall also be issued for the export of goods or services by such assessee.

(Reference Notification Number 70/2020 – Central Tax dated 30.09.2020)

5.2 The assessee whose aggregate turnover is above 500 crores in any preceding financial year from 2017-2018 shall issue invoice incorporating Dynamic Quick Response (QR) code while issuing B2C invoice from 01.12.2020.

(Reference Notification Number 71/2020 – Central Tax dated 30.09.2020)

5.3 Quick Response (QR) code which has embedded Invoice Reference Number (IRN) is mandatory while issuing E-Invoice. Hence, mentioning of IRN number on the invoice will not be considered as valid E-invoice. In case of E-invoice, instead of physical copy of invoice, Quick Response (QR) code having an embedded Invoice Reference Number (IRN) can also be produced electronically on verification by the proper officer.

(Reference Notification Number 72/2020 – Central Tax dated 30.09.2020)

5.4 The relaxation for a period of first one month have been provided to the assessee who are required to issue E-invoice from 01.10.2020 having aggregate turnover of 500 crores in any preceding financial year from 2017-2018. However, they shall follow special procedure whereby they shall obtain an Invoice Reference Number (IRN) for such invoices by uploading specified particulars in FORM GST INV-01 on the Common Goods and Services Tax Electronic Portal, within thirty days from the date of such invoice. However, it is to be noted that assessee who is not following this procedure within 30 days, such invoice will not be treated as an invoice at all.

(Reference Notification Number 73/2020 – Central Tax dated 01.10.2020)

While receiving any goods or services from an assessee whose aggregate turnover is above 500 crores in any preceding financial year, assessee must take valid E-invoice with Quick Response (QR) code having an embedded Invoice Reference Number (IRN). This will enable the assessee to avail the input tax credit. If it is not a valid E-invoice, receiver will not be entitled to avail the credit as it will not be considered as tax invoice. Hence, assessee must ensure that they are getting valid E-invoice, while receiving goods or services from such assessee who are required to issue E-invoice.

STUDENTS' CORNER

CRUX OF TECHNICAL ANALYSIS

Compiled by Neel Randeria



It is my sincere request in the very beginning, to approach this write-up as a discussion and not as an article. Basically, this write-up is to induce few questions regarding stock markets. So, are all stock market aficionados ready?

Assuming majority of the readers would be investing in markets, the fundamental goal of every investor is clear- To predict the future prices and take positions accordingly. But, how to forecast future prices? There are 2 broad methods- Fundamental and Technical Analysis. The former studies intrinsic value of shares using financials of companies to conclude whether there is under or over valuation. The latter uses charts to predict future movements of prices. The intent of this write-up is to discuss about technical analysis because retail investors are not much acquainted with it and those who refer charts, too lack the roots of technical analysis. Thus, let us dive into this concept right away.

Being a commerce student, I had always heard that before investing in any stock, we should thoroughly read its financial statements and check its ratios. But later I came to know that there is a school of thought that preaches that- financial statements and ratio analysis are not at all important while investing in markets; and this made me uncomfortable. That school of thought was- Technical Analysis. I did not believe this in the first instance, but there are people earning fortunes just due to this concept. Hence, I started reading the best book available on Technical Analysis, written by John Murphy, and following is what I interpret.

Technical analysis is a concept built on 3 pillars.

1. History repeats itself.
2. Prices move in trends.
3. Price & Volume reflect everything.

A technical analyst (referred as- chartist) does not concern himself with the reasons of rise or fall in price. He is aware that there might be some factors leading to a change in price, but he is not bothered with the reasons at all. Rather, he is of the opinion that- charts used for technical analysis uses just 2 things- price and volume; which are enough to forecast future price changes because- *everything that affects market price is ultimately reflected in market price, then the study of that market price is all that is necessary. Isn't this true?*

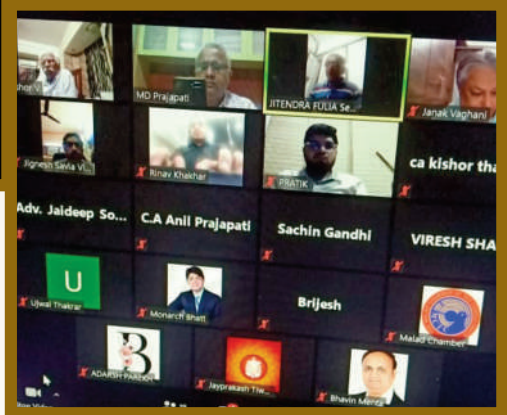
In the study of technical analysis, the most important role is played by past data. Chartists state that- *future is nothing but just a repetition of past*. The logic is straightforward- patterns that work in past will surely work in future because they are based on human psychology which does not change. But just like majority of concepts have criticisms, logic of technical analysis too has few.

One of the biggest critic of this logic is **Random Walk Hypothesis**. This is a mathematical model which states that- price changes are random and unpredictable. There can be no trends. Past data is not a reliable indicator of future price direction. In short, price is *serially independent*. On the other hand, the technical analysis community totally rejects the presence of randomness in markets. What do you think? As for me, I would like to quote Nassim Nicholas Taleb:

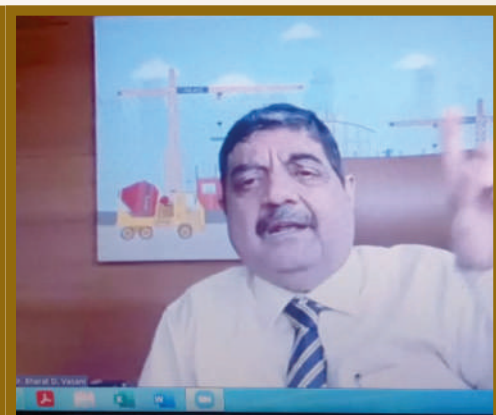
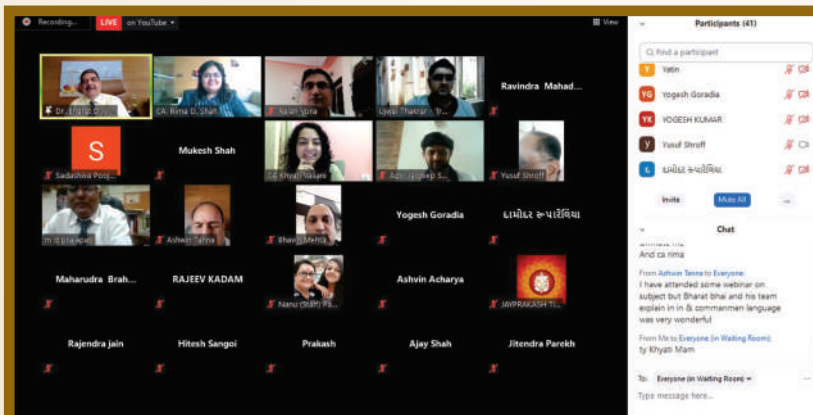
Mild success can be explainable by skills and labour. Wild success is attributable to variance.



2ND MANAGING COMMITTEE ON 1ST OCTOBER



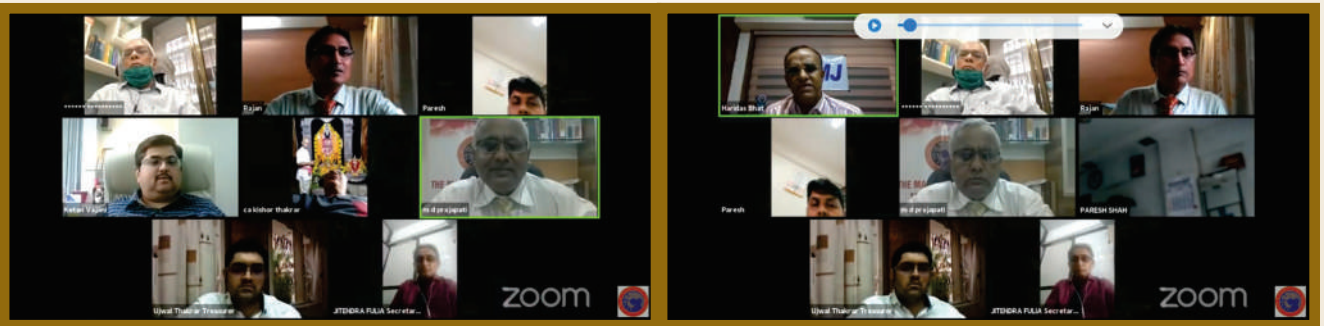
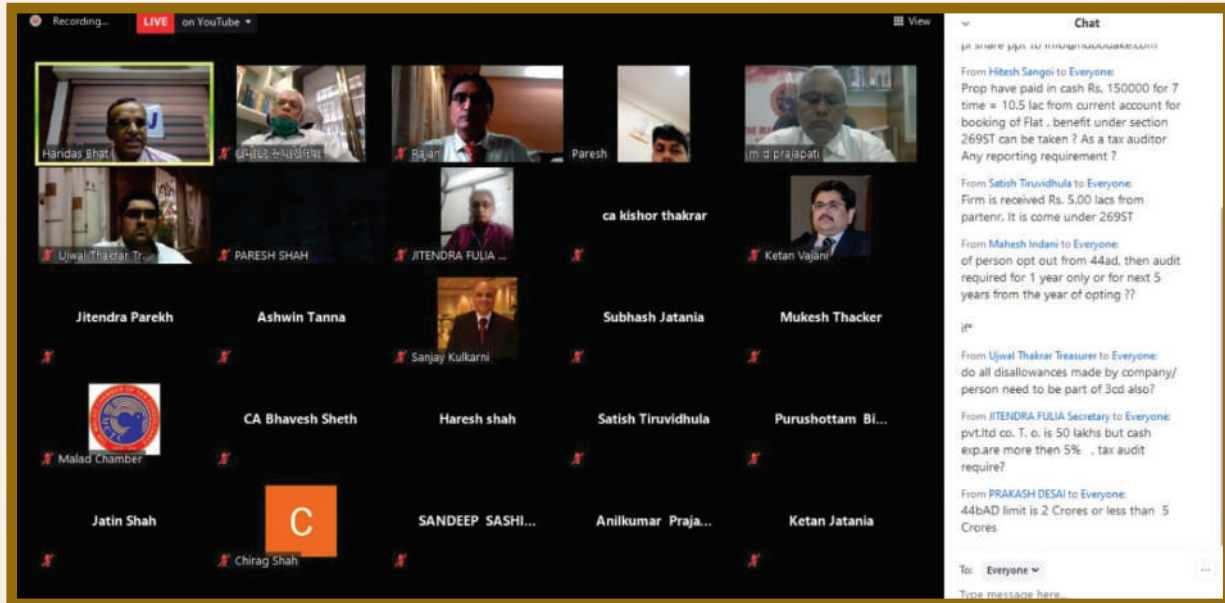
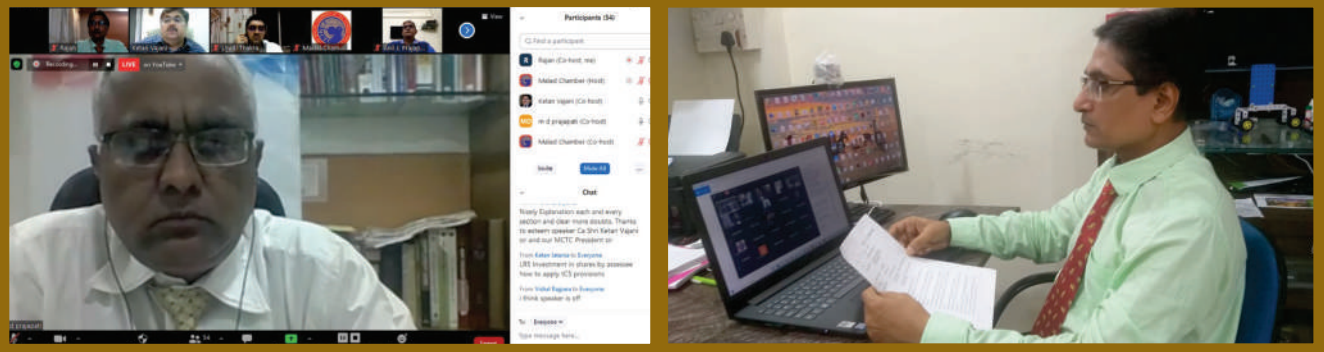
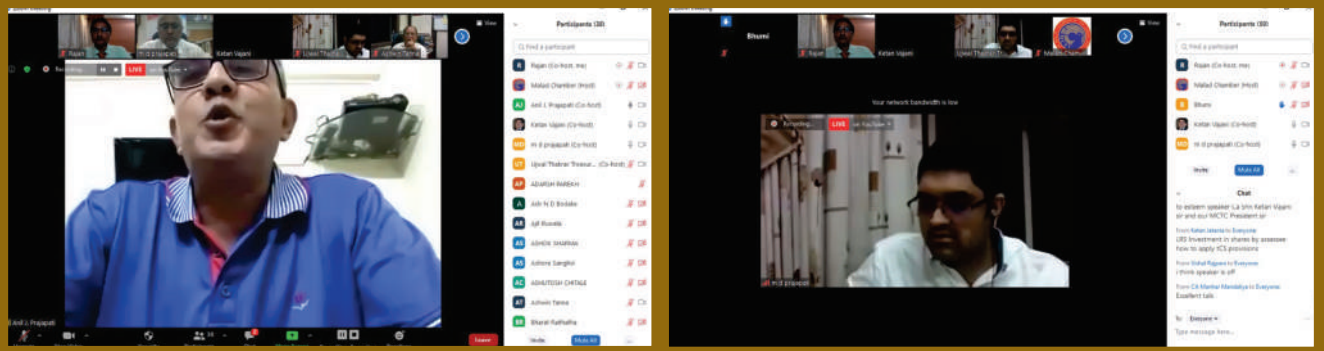
6TH STUDY CIRCLE MEETING



6TH STUDY CIRCLE MEETING



7TH STUDY CIRCLE MEETING HELD ON 2ND OCTOBER



FACULTY OF 6TH & 7TH STUDY CIRCLE MEETING

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