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- (1) After each MCQ, four options have been given. Choose the correct and most appropriate option and darken the corresponding circle against the MCQ number in the OMR answer sheet.*
- (2) Answer to MCQs, if written inside the descriptive answer book shall not be awarded any mark.*
- (3) Please ensure to write and darken correct MCQ booklet number in the OMR answer sheet. The correct MCQ booklet number must also be written in the attendance register.*
- (4) Please write your Roll No. and name on the topmost page of the MCQ booklet at the specified place without fail.*

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## PART - I

## Integrated Case Scenario - I :

M/s Far Sites (FS), a proprietorship firm registered under GST in Chandigarh and deals in supply of variety of goods including electronic goods and repair & maintenance thereof. FS furnishes following information for the month of December 2024 :

Outward supplies during the month of December 2024 are as under :

Supply of goods to unregistered persons in Chandigarh (Out of the aforesaid supply, goods worth ₹ 1,00,000 were not liable to GST. However, FS inadvertently charged GST on such goods and collected the same from the customers).	₹ 10,00,000
Supply of goods to registered suppliers located in Punjab	₹ 20,00,000
Repair & maintenance services provided to unregistered persons located in Haryana	₹ 5,00,000

Inward supplies during the month of December 2024 are as under :

Purchase of TV sets from registered suppliers. During unloading of said TV sets, five LED TVs and two QLED TVs valued to ₹ 2,00,000 got completely damaged, but the supplier refused to replace the same.	₹ 20,00,000
Purchase of washing machine from unregistered suppliers (Intra-State supply)	₹ 5,00,000
Transportation charges paid to Sri Logistics (unregistered GTA)	₹ 1,00,000

Further, the following information is also provided related to December 2024 :

- (1) FS received security services from M/s LML Limited Chandigarh amounting to ₹ 50,000. M/s LML Limited is an unregistered supplier.

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- (2) Rent of Shop paid to Municipal Corporation of Chandigarh = ₹ 50,000
- (3) Legal fee of ₹ 10,000 paid to Mr. Prakash, a Senior Advocate of Punjab and Haryana High Court for providing legal advice. 7518 00
- (4) FS issued vouchers worth ₹ 2,00,000 to its customers, which were eligible to be redeemed against identified goods. Also, certain customers were issued vouchers worth ₹ 5,00,000 and the same can be redeemed against any supply of goods till March 2025.
- (5) FS procured old and used goods worth ₹ 5,00,000 on which GST is payable on reverse charge basis. The goods were received on 25<sup>th</sup> December, 2024. The supplier issued the invoice on 24<sup>th</sup> December, 2024 and payment for the same was debited from the bank account of FS on 31<sup>st</sup> December, 2024. Due to the leave of accountant, the transaction was recorded in the books of accounts on 1<sup>st</sup> January, 2025.
- (6) FS received long term lease of an industrial plot from Chandigarh Housing Board (CHB) in auction against payment of an upfront amount as lease premium amounting to ₹ 20 lacs for a period of 50 years. The company paid prime location charges of ₹ 5 lacs in addition to the said premium.
- (7) FS belatedly filed its GSTR-3B for the month of November 2024, by 9 days. Net tax liability for the month of November 2024 was ₹ 3,80,000.

Applicable rate of GST on all supplies was 18% except for transportation charges for which the applicable GST rate is 5%. Ignore bifurcation of CGST, SGST and IGST.

There is no opening ITC available for the relevant tax period in the electronic credit ledger of FS.

**Note :** All the above amounts are exclusive of GST, except wherever explicitly stated.



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Based on the facts of the case scenario given above, choose the correct answer to

**Question Nos. 1 to 6 below :**

1. What is the time limit for issuance of show cause notice in respect of the GST inadvertently charged and collected on the goods in December 2024 assuming that M/s Far Sites does not deposit the same with the Government ? 2

- (A) Within 4 years and 6 months from due date of filing annual return for the financial year.
- (B) Within 2 years and 9 months from due date of filing annual return for the financial year.
- (C) No time limit to issue the show cause notice.
- (D) No show cause notice is required to be issued. The tax amount shall be refunded to the customers if the customer demands the same.

2. Which of the following statement(s) is correct with respect to interest liability of M/s Far Sites, for the month of December 2024 ? Consider the year to be of 365 days. 2

- (A) Interest liability of M/s Far Sites is ₹ 1,686 and he cannot utilize the input tax credit for the payment of interest. He needs to pay the interest in cash.
- (B) Interest liability of M/s Far Sites is ₹ 1,686 and he can pay the same either from input tax credit available in electronic credit ledger or in cash.
- (C) Interest liability of M/s Far Sites is ₹ 1,687 and he can pay the same from input tax credit available in electronic credit ledger or in cash.
- (D) Interest liability of M/s Far Sites is ₹ 1,687 and he cannot utilize the input tax credit for the payment of interest. He needs to pay the interest in cash.

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3. There has been dispute between M/s Far Sites and GST Department. As per the opinion of M/s Far Sites :

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- (i) The time of supply of all vouchers as mentioned above is the date of redemption.
- (ii) The amount received as long term lease of an industrial plot from Chandigarh Housing Board (CHB) in auction against payment of an upfront amount as lease premium and paid prime location charges are exempt.

The GST Department is of the view that :

- (iii) The time of supply of vouchers amounting to ₹ 2,00,000 is December 2024 whereas the time of supply of vouchers amounting to ₹ 5,00,000 is the date of redemption.
- (iv) The amount received as long term lease of an industrial plot from Chandigarh Housing Board (CHB) in auction against payment of an upfront amount as lease premium is exempt and amount of prime location charges are taxable under reverse charge.

Based on the above views, which of the above statements are true :

- (A) (ii) and (iii)
- (B) (i) and (ii)
- (C) (i) and (iv)
- (D) (ii) and (iv)

4. The total value of inward supplies on which GST is payable by M/s Far Sites under reverse charge for December 2024 is :

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- (A) ₹ 6,60,000
- (B) ₹ 7,10,000
- (C) ₹ 11,60,000
- (D) ₹ 12,10,000



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5. The amount of eligible input tax credit, ignoring reversal under rule 42 or 43 if any, that can be availed by M/s Far Sites for December 2024 is : 2
- (A) ₹ 4,38,800 (B) ₹ 6,18,800  
(C) ₹ 5,28,800 (D) ₹ 4,29,800
6. GST payable in cash by M/s Far Sites for the month of December 2024 is : 2
- (A) ₹ 3,86,800 (B) ₹ 3,73,800  
(C) ₹ 1,84,800 (D) ₹ 1,97,800

**Integrated Case Scenario – II :**

LLD & Co, a Partnership firm, is engaged in manufacturing of electric equipments in the State of Gujarat. The firm became liable for registration on 14<sup>th</sup> April, 2024. It applied for registration on 16<sup>th</sup> May, 2024 and was granted registration certificate on 20<sup>th</sup> May, 2024.

The firm had opted for composition levy under section 10 of the CGST Act, 2017 at the time of registration.

Its turnover for the quarter ending June 2024 was ₹ 82 lakh, out of which taxable supply was amounting to ₹ 80 lakh and exempt supply was amounting to ₹ 2 lakh.

Its turnover crossed ₹ 150 lakh on 9<sup>th</sup> July, 2024 and LLD & Co had opted for withdrawal of composition scheme on the said date.

The firm provided a supply of equipment to GGY Ltd. (an unrelated limited company) on 20<sup>th</sup> July, 2024 having market value of ₹ 21 lakh, wholesale value of ₹ 22 lakh and maximum retail price was ₹ 23 lakh. However, the transaction was made at ₹ 18 lakh.

During the month of June, 2024, LLD & Co has received one taxable service covered under reverse charge u/s 9(3) of CGST Act, 2017 from a registered supplier Mr. Sachin Kumar in the course of intra-state supply. LLD & Co failed to issue any document to Mr. Sachin Kumar relating to this transaction.

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Other details for this particular inward service are as follows :

Particulars	Date
Supply of service	03/06/2024
Invoice raised by Mr. Sachin Kumar	09/07/2024
Payment recorded in the books of LLD & Co	07/08/2024
Payment debited in the bank account of LLD & Co	14/08/2024
Payment recorded in the books of Mr. Sachin Kumar	08/08/2024
Payment credited in the bank account of Mr. Sachin Kumar	16/08/2024

LLD & Co has not opted QRMP Scheme.

All the amounts given above are exclusive of taxes, wherever applicable. All the supplies referred above are intra-State and price is the sole consideration.

Based on the information given above, choose the correct answer for the following  
**Questions Number 7 to 12 :**

7. The tax payable by LLD & Co for the quarter ending June, 2024 will be : 2

- (A) ₹ 41,000 each under CGST and SGST  
(B) ₹ 40,000 each under CGST and SGST  
(C) ₹ 80,000 each under CGST and SGST  
(D) ₹ 82,000 each under CGST and SGST

31<sup>st</sup> day = 9 Aug -

8. Time of supply for the purpose of payment of tax, for transaction with Mr. Sachin Kumar as per GST Laws will be : 2

- (A) 09/07/2024  
(B) 07/08/2024  
(C) 08/09/2024  
(D) 08/08/2024



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9. Which of the following document is mandatory to be issued by LLD & Co, in relation to transaction with Mr. Sachin Kumar as per the GST Laws ?

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- (A) Payment voucher
- (B) Bill of supply
- (C) Receipt Voucher
- (D) Tax Invoice

10. The effective date of registration of LLD & Co is :

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- (A) 16<sup>th</sup> May, 2024
- (B) 14<sup>th</sup> May, 2024
- (C) 14<sup>th</sup> April, 2024
- (D) 20<sup>th</sup> May, 2024

11. LLD & Co needs to furnish a statement containing details of stock of inputs / inputs contained in semi-finished / finished goods on the withdrawal of composition scheme by :

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- (A) 9<sup>th</sup> July 2024
- (B) 23<sup>rd</sup> July 2024
- (C) 8<sup>th</sup> August 2024
- (D) 7<sup>th</sup> August 2024

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12. The value of supply of equipment under section 15(1) of CGST Act, 2017 made by LLD & Co to GGY Ltd. will be

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- (A) ₹ 18 lakh (B) ₹ 21 lakh  
(C) ₹ 22 lakh (D) ₹ 23 lakh

13. M/s Heart & Soul Private Limited imported a consignment of goods from France through sea. The value of said consignment was ₹ 800 lakh and total custom duty payable was ₹ 180 lakh. Company filed bill of entry for home consumption but the goods got deteriorated after unloading and after examination in India but before clearance for home consumption. The value of the goods after deterioration comes down to ₹ 200 lakh and the same was agreed by the proper officer.

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The amount of total custom duty payable at the time of clearance of goods will be :

- (A) ₹ Nil (B) ₹ 180 lakh  
(C) ₹ 45 lakh (D) ₹ 135 lakh

14. Countervailing duty under section 9 of the Customs Tariff Act, 1975 shall not be levied unless it is determined that :

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- (i) Subsidy relates to use of domestic goods over imported goods in the export article.  
(ii) Subsidy relates to export performance.  
(iii) Subsidy is conferred on all the persons engaged in the manufacture of articles whether to be exported or to be consumed domestically.

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Choose the correct option :

- (A) Only (iii)
- (B) (i) and (ii)
- (C) (ii) and (iii)
- (D) (i) (ii) and (iii)

15. M/s Rise & Progress Medicare Clinic is a multispecialty hospital located at Chennai, Tamil Nadu. It has provided the following services to one of its patient :

- (i) Air ambulance service provided to transport critically ill patient from distinct location to the hospital and total fee charged by way of said service ₹ 80,000 (exclusive of taxes).
- (ii) Services by way of providing general ward room having room charges exceeding ₹ 7,500 per day to the patient receiving health care services and total fee charged by way of said services is ₹ 1,72,500 (exclusive of taxes).

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Total value of taxable outward supply provided to the patient by Rise & Progress Medicare Clinic will be :

- (A) ₹ 1,72,500
- (B) ₹ 80,000
- (C) ₹ 2,52,500
- (D) ₹ NIL

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## PART – II

1. M/s BBV Ltd. of Nagpur, registered under GST in the State of Maharashtra, is engaged in providing following types of outward supplies : 14

- (i) Manufacture of taxable product 'D'
- (ii) Service of hiring of trucks *exempt supply.*
- (iii) Services on which tax payable under reverse charge
- (iv) Other supplies

M/s BBV Ltd. has provided the following details related to the outward supplies for the month of October, 2024 :

S. No.	Particulars	Amount (₹)
(i)	Export of product 'D' with payment of IGST	16,50,000
(ii)	Product 'D' supplied under a Letter of Undertaking (LUT) to M/s CFF Pvt. Ltd. located in a SEZ in the State of Maharashtra.	9,00,000
(iii)	Export of product 'D' under Letter of Undertaking (LUT)	11,00,000
(iv)	Domestic outward supply turnover of product 'D'	46,00,000
(v)	Domestic Turnover of other outward services on which tax is payable under reverse charge	8,00,000
(vi)	Sale of securities (Purchased at ₹ 36,00,000 in the month of January, 2024)	42,00,000
(vii)	Outward supply of Hiring of trucks to M/s ABB, a goods transport agency for transportation of goods.	7,00,000
(viii)	Sale of land (excluding stamp duty value of ₹ 2,80,000, being 2% of value considered for the purpose of stamp duty) (Land was purchased in the month of November, 2023)	1,25,00,000
(ix)	Interest received on investment in fixed deposits with a public sector bank.	2,51,000

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Details of inward supplies for the month of October, 2024 :

S. No.	Particulars	Amount (₹)
(i)	Common inputs and input services used for outward supply of goods and services mentioned above : (a) Inputs – ₹ 20,00,000; (b) Input services – ₹ 8,00,000 Nothing has been used for any non-business purpose.	28,00,000
(ii)	Freight paid in relation to product 'D' to an <u>unregistered</u> goods transport agency, used in relation to <u>taxable supply only.</u>	75,000

**Note :**

- (1) All the amounts given above are exclusive of GST, wherever applicable. There is no opening balance of any input tax credit. Assume that all the conditions necessary for availing the input tax credit have been fulfilled including that details of GST paid on inward supplies are available in GSTR 2B.
- (2) Assume that all the domestic transactions of company are inter-state and that rate of IGST on goods and services are 12% and 18% respectively; however rate for goods transport agency service to be considered as 5%.
- (3) Company is not covered under any of the exception provided in rule 86B of CGST Rules, 2017 regarding restriction on use of available Input Tax Credit.

Compute the **net minimum GST liability** of M/s BBV Ltd., to be paid in cash if any, after utilizing Input tax credit if any, for the month of October, 2024.

**Note :** Legal explanations for each point should form part of your answer.

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2. (a) M/s. JLM & Sons, a partnership firm, is registered under GST at Bengaluru in the State of Karnataka. It has provided the following information related to the month of October, 2024 :

S. No.	Particulars	Amount (₹)
(i)	Amount charged for composite supply of goods and services by way of milling of wheat into wheat flour, along with fortification to Tamil Nadu Government for distribution of such wheat flour under Public Distribution System (PDS) in Tamil Nadu. (The value of supply of goods in the above supply constitutes 49% of the value of composite supply)	8,50,000
(ii)	Taxable supply of direct selling agent services to a local branch of a public sector Bank.	4,00,000
(iii)	Supply of tobacco leaves as agriculturist to M/s Ram & Sons, a sole proprietorship firm registered at Hubli (Karnataka).	1,05,000
(iv)	Amount received for services provided to state government in relation to training of drivers at Karnataka during the road safety week celebration of the Karnataka Government. (79.50% of the total expenditure is borne by the government)	1,05,000

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(v)	JLM & Sons got the permission from the municipal authorities to build an 8 floors building in the Bengaluru. But it agreed to build only 4 floors building and received ₹ 26,00,000 as compensation from Sunil Constructions Ltd., a neighbouring housing project which wants to protect its sunlight.	26,00,000
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Based on the information given above, calculate the taxable value of supply under GST law on which tax to be paid by M/s JLM & Sons and also calculate tax payable for each item separately for the month of October, 2024.

All the above amounts are excluding of GST, if any.

Assume Rate of CGST and SGST @ 9% each and IGST @ 18% for all the supplies covered including services of obligation to refrain from an act or to tolerate an act.

- (b) M/s VRM Ltd. is a registered job worker in the State of Haryana under GST and providing various job work services related to metal products. On 30<sup>th</sup> April, 2024 VRM Ltd. received steel cabinets worth ₹ 48 lakh under a delivery challan with e-way bill for the purpose of job work from M/s Vijay Pvt. Ltd. a registered manufacturer in Haryana. 5

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The scope of job work included mounting the steel cabinets on a metal frame and sending back the mounted cabinets to Vijay Pvt. Ltd. The metal frames are to be supplied by M/s VRM Ltd. along with services relating to job work.

VRM Ltd. has agreed to charge total consideration of ₹ 6.50 lakh for the entire mounting job work activity including the value of metal frames.

During the course of mounting activity, metal waste is generated out of metal frames, which is sold by M/s VRM Ltd. for ₹ 52,000. VRM Ltd. sent back the steel cabinets mounted on the metal frame to Vijay Pvt. Ltd. on 13<sup>th</sup> October, 2024 under a delivery challan with e-way bill.

You are required to compute taxable value and the GST liability of M/s VRM Ltd. related to this transaction in any tax period.

Assume GST rate for metal frame as 28%, for metal waste as 12% and for services as 18%. Also, give reason(s) for inclusion or exclusion of the value of cabinets in the job charges for the purpose of payment of GST by VRM Ltd.

- (c) DEF Ltd. imported a packaging machine from USA. DEF Ltd. paid ₹ 56,000 as charges for development activities for work done in India with respect to the imported machine. 4

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Further, the following particulars are furnished and you are required to compute the Assessable Value for the purpose of customs duty payable :

S. No.	Particulars	Amount (\$)
1.	Price of the Machine	20,000
2.	Freight (Air)	5,000
3.	Design charges paid to a firm in <u>USA</u>	300
4.	License fee relating to imported goods payable by the <u>buyer as a condition of sale</u>	10% of Price of Machine
5.	Buying commission paid by the buyer to his agent in <u>USA</u>	200
		<b>Amount (₹)</b>
6.	Materials and components supplied by the buyer free of cost	50,000
7.	Insurance paid to the insurer in India	6,000

**Other Particulars :**

- (i) The commission payable with respect to sales to the local agent of the exporter is 5% of cost of the machine.

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- (ii) Materials and components supplied by the buyer free of cost are valued at ₹ 50,000.
- (iii) Inter-bank exchange rate as arrived by the authorized dealer is ₹ 82.50 per \$.
- (iv) CBIC had notified for purpose of Section 14 of the Customs Act, 1962, exchange rate of ₹ 83 per \$.

3. (a) Determine the 'place of supply' along with explaining the correct provision of law for the following independent cases : 5

(i) Mr. Prakash Kumar (unregistered person under GST law) is a resident of Surat, Gujarat. He places an order on 'E-SHOPPE' (an e-commerce platform) for supply of laptop, which is to be delivered to his sister Ms. Ridhima at Mumbai, Maharashtra. Mr. Prakash, while placing the order on the above e-commerce platform, provides the billing address of his residence located in Surat, Gujarat.

(ii) Ms. Ritu is proprietor of 'G n F Center', situated at Lucknow and registered under 'GST law in Uttar Pradesh'. Her client Ms. Neha (unregistered person under GST law) located at Delhi, requests her to provide personal grooming & fitness services at her home at Delhi. Ms. Ritu provided her grooming & fitness services at client's home at Delhi.

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(iii) Décor n Décor, an interior decorator firm located at Dehradun, Uttarakhand, enters into a contract with Mr. Diego of Italy to provide interior decoration services in respect two immovable properties of Mr. Diego one located at Dehradun, Uttarakhand and another located at Italy.

(iv) SQR Mills Private Limited of Kolkata, registered under GST law in West Bengal gives a contract to LQR Private Limited of Varanasi, registered under GST law in Uttar Pradesh to supply a machine which is required to be assembled at a printing plant of SQR Mills Private Limited located at Bhopal, Madhya Pradesh.

(b) M/s Vijay Communication Ltd., a registered telecom operator is planning to bid for securing the right to use spectrum offered by the Government under the spectrum allocation model followed by Department of Telecommunications (DoT). 5

Company appointed you as advisor to give advice when the liability of payment of GST will arise in the following independent situations :

- (i) In case where full upfront payment is made.
- (ii) In case where deferred payment is made by the telecom operator in 18 Monthly instalments.

Give your advice by explaining the relevant legal provisions with reference to the liability to pay GST, issue of invoice and time of supply.

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- (c) M/s Falcon Ltd. imported capital goods worth ₹ 3 crore after payment of customs duty of ₹ 30 lakh on 10<sup>th</sup> September, 2024 and the duty concession of ₹ 15 lakh was availed under Customs (Import of Goods at Concessional Rate of Duty or for specified end use) Rules, 2022. 4

Imported capital goods started being used for the specified purpose as per the exemption notification with effect from 3<sup>rd</sup> January 2025. M/s X Ltd., cleared the above said imported capital goods after having been used for the specified purpose on 15<sup>th</sup> April 2025.

You are required to calculate the differential duty payable being difference between the duty leviable on such goods on clearance for which the exemption was availed at the time of importation and that already paid, along with interest payable at the rate fixed by the notification issued under section 28AA of the Customs Act, 1962. Differential duty has been paid on 30<sup>th</sup> April, 2025. Step by step working should be part of your answer.

The applicable rate of customs duty is @ 15% (ignore any other cess or duty).

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4. (a) M/s XYZ, registered in the State of Maharashtra under GST, made the following supplies during the last week of October 2024. Considering the below mentioned independent supplies your advice is sought with appropriate reasoning for applicability of TDS provisions on the supplies made by XYZ along with quantification of the amount of TDS, if applicable. Value of supply is exclusive of GST unless otherwise stated. The applicable rate of GST on outward supplies made is CGST 9%, SGST 9% and IGST 18%. 5

- (i) Provided taxable supply worth ₹ 20,000 & exempted supply worth ₹ 40,000/- in an invoice to the Government of NCT of Delhi at New Delhi where a contract for supply is for ₹ 5,00,000/- (out of which ₹ 2,60,000 is for taxable supply including GST and ₹ 2,40,000 is for exempted supply).
- (ii) Provided supply of taxable goods amounting to ₹ 20,00,000 to Mumbai office of National Housing Bank, a society established by Government of India under the Societies Registration Act, 1860
- (iii) Provided taxable services worth ₹ 5,00,000 to the Government department of Himachal Pradesh (Registered in Himachal Pradesh only) directly in relation to the property located at Nagpur in the State of Maharashtra and being managed by the government of Himachal Pradesh.

- (iv) Provided supply of taxable goods valued at ₹ 1,00,000 (Contract Value ₹ 2,50,000) to Government of Chhattisgarh.
- (v) Provided supply of taxable iron scrap valued at ₹ 3,00,000/- to M/s GGS Private Limited, a non-government private company and registered under GST in Mumbai, Maharashtra.

- (b) (i) RRY Ltd. has two registered places of business, one in the State of Tamil Nadu and another in the State of Karnataka. Aggregate turnover during the previous financial year 2023-2024 for both the places of business was ₹ 3.27 crore and ₹ 1.47 crore respectively for Tamil Nadu and Karnataka. RRY Ltd. wishes to opt for 'Quarterly Return Monthly Payment' scheme popularly known as QRMP for one of its place of business in the current financial year 2024-25 and wants to continue with regular return filing scheme and to file return on monthly basis for its other place of business.

You are required to examine the above case and answer that can RRY Ltd. do so ? Explain with reasons with reference to GST law.

- (ii) Examine the statement, "Once the E-Commerce operator (ECO) has complied with the dynamic QR code requirements for issuing invoices, the suppliers using such e-commerce portal for B2C supplies will not be required to comply with the requirement of dynamic QR code".

Comment on the validity of the above statement with reference to GST law.

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- (c) Sarah of Germany, a person of foreign origin, has come to India on a tour on travel visa. She carries with her the following as part of baggage :

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S. No.	Particulars	Value in (₹)
(i)	140 sticks of cigarettes of ₹ 120 each	16,800
(ii)	Travel Souvenir	75,000
(iii)	Other articles carried on in person	1,25,500
(iv)	Fire arm with 110 cartridges (value includes the value of cartridges at @ ₹ 510 per cartridge).	1,10,000

Determine with short explanations where required, customs duty payable on concessional baggage, if the effective rate of customs duty on baggage is 38.50% inclusive of social welfare surcharge. Ignore any other applicable cess or duty.

5. (a) Mr. X, a registered person under GST, issued invoice without actual supply of goods for taxable value amounting to ₹ 20 crore. Central GST authority issued a show cause notice under section 74 by demanding following :

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CGST & SGST 18% — ₹ 3.60 crore

Penalty u/s 74 amounting to 100% of tax due — ₹ 3.60 crore

Interest @ 18% per annum

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You are required to answer the following :

- (i) Can the amount of tax be demanded in such cases ?
- (ii) Is it a cognizable offence ?
- (iii) Quantum of punishment if Mr. X has been convicted.
- (iv) Amount of penalty leviable on Mr. X, if any.
- (v) Amount of penalty leviable on the person who aids or abets the above offence.

(b) M/s Karim Associates (Supplier) was issued Show Cause Notice u/s 74 of CGST Act, 2017 by the Adjudicating Authority (AA). In the final order dated 30-08-2024 issued to M/s Karim Associates, the Additional Commissioner of Central Tax (AA) confirmed the tax demand of ₹ 60,00,000. Demand on account of penalty of equal amount and interest amounting to ₹ 16,00,000/- was also confirmed. *60 lak*

However, the Revisional Authority (RA), using the powers u/s 108 of the CGST Act, on its own motion called for the records and found that the order passed by the AA is erroneous in so far as it is prejudicial to the interest of revenue and enhanced the tax demand to ₹ 70,00,000, penalty of equal *70 lak* amount and interest amounting to ₹ 20,00,000 by order dated 15-11-2024.

The Supplier admitted tax demand of ₹ 20,00,000, interest amounting to ₹ 5,00,000 and penalty for ₹ 20,00,000 and deposited the admitted tax, interest and penalty on 30-11-2024. For the balance amount, the Supplier decided to file an appeal and appointed a Chartered Accountant for this purpose. The appeal was filed with the necessary pre deposit of the amount and the same was decided in favour of M/s Karim Associates on dated 28-02-2025.

(15)

ETX2

The application for refund of pre-deposit was made on 01-03-2025 and refund was granted on 14-03-2025.

Considering the above facts, you are required to answer the following :

- (1) The appellate authority to which M/s Karim Associates would be required to file the appeal against the order of RA.
  - (2) The amount of Pre-Deposit required to be deposited along with the above appeal.
  - (3) Compute the amount of interest payable on refund of such pre-deposit under section 115 of the CGST Act, 2017.
  - (4) The amount of pre-deposit required assuming if the appeal is to be filed against the orders of AA with original demand and after considering the same amount of payment of admitted demand deposited on 30-11-2024.
- (c) Mr. Ankush imported the goods from France and applied for warehousing of the said goods. The Proper officer made an order permitting the deposit of the goods on 21<sup>st</sup> May, 2024. Mr. Ankush deposited goods in warehouse on the same day. These goods were re-exported without payment of duty on 15<sup>th</sup> October, 2024. 4

The custom department wants to levy interest @ 15 % per annum on duty deferred as goods remain in a warehouse beyond a period of 90 days from the date on which the order permitting deposit of goods in a warehouse under section 60(1) was made. With reference to the Customs Act, 1962 and relevant case law, discuss whether any interest is payable by Mr. Ankush in such case.

ETX2

P.T.O.

(16)

**ETX2**

6. (a) State the power and procedure of Authority for Advance Ruling (AAR) and Appellate Authority for Advance Ruling (AAAR) with reference to section 105 and 106 of CGST Act, 2017.
- (b) Write short note on the 'Assessment of Non-filer of returns' under section 62 of the CGST Act, 2017.

**OR**

- (b) Under what circumstances, special audit under section 66 of the CGST ACT, 2017 may be directed? Is the special audit provision applicable even if the accounts of the registered person have already been audited under any other provisions of the GST law?
- (c) With reference to customs law state the mandatory documents required for (any two for each) :
- (i) Export of goods
  - (ii) Import of goods

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**ETX2**