# E-NEWSLETTER


## GOA BRANCH OF WESTERN INDIA REGIONAL COUNCIL OF THE INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA

(Set Up by an act of Parliament)

# जागृती

*Arise, Awaken, Aspire*

E-NEWSLETTER
**Volume VII**
**Part 2**
**May 2025**

# INDEX



# MANAGING COMMITTEE

CA. VISHWANATH S.S. BHOBE
Chairperson

CA. VINAYAK DHUMATKAR
Vice Chairperson

CA. VAIBHAV BALE
Secretary

CA. AKSHAY MULGAONKAR
Treasurer

CA. SNEHA MENON
WICASA Chairperson

CA. VENKATESH SHENAI
Managing Committee Member

# Chairperson's Communiqué

Respected Seniors and Colleagues in the Profession,

The month of May usually serves as a welcome breather — a time to travel and enjoy well-deserved summer vacations with family, allowing us to unwind from our routine, rejuvenate, and gear up for the busy season ahead with tax filings and audits.

The Income Tax Department has extended the due date for filing income tax returns for non-audit cases to 15th September. However, I urge all of you to begin the filing process early and not wait until the last moment — timely action will help avoid unnecessary stress and ensure smoother compliance.
Even during this breather month, your branch remained committed to professional development by organizing a series of impactful knowledge sessions. We are truly encouraged by the enthusiastic response to these initiatives.

We conducted a lecture meeting on 'Peer Review – Mandates & Procedures', aimed at familiarizing members with the peer review mechanism and guiding them in strengthening their documentation practices to prepare effectively. CA Kamlesh Amlani, an experienced peer reviewer, led the session and shared valuable insights from his professional journey.

We also organized a lecture meeting on 'Overview of TDS & TCS Provisions Applicable from 1st April 2025' — a vital area of Income Tax Law that has seen several recent amendments. The session helped members stay updated and better understand and discuss the evolving provisions under the TDS and TCS framework. We extend our sincere thanks to CA Archana Kenkre for graciously accepting the invitation at short notice and sharing her in-depth knowledge. Bothe the sessions were very well received by the members.

On the students' front, May marked the CA Examinations — a time when students put their hard work and dedication to the test in pursuit of their dream. We extend our best wishes to all aspirants for success and excellent results. We also conducted Mock Test Series for Foundation students appearing in the May 2025 exams to help them assess their preparedness, under the guidance of the Board of Studies.

The month of June promises to be even more exciting, with a vibrant mix of academic and non-academic sessions. Highlights include International Yoga Day celebrations, the MSME Mahotsav, the National Talent Search for students, and our flagship event — the Sub-Regional Conference of WIRC 2025, titled 'The Confluence – Knowledge | Technology | Wisdom'. This conference will feature enriching sessions by some of the finest faculties from across the country, covering a wide array of contemporary topics. It will be a valuable opportunity for professional development, networking, and meaningful exchange of ideas. Let us come together to make the Sub-Regional Conference a truly memorable experience.

As I close my address, I extend my heartfelt gratitude to all our members and students for their continued participation, support, and enthusiasm. Let us continue working together with shared purpose and mutual respect to strengthen our profession and grow collectively. As the saying goes, "Alone we can do so little; together we can do so much."
Wishing you all a productive and fulfilling month ahead.

*With Best Wishes*
**CA Vishwanath S. S. Bhobe**
*Chairperson, Goa Branch (WIRC) of ICAI, 2025-26*

# Direct Tax & Corporate Law Updates - May 2025

*-CA. Rohan Bhandare*

Given below are summarised versions of certain important Circulars/Notifications/Press Releases for May 2025 issued by the Central Board of Direct Taxes (CBDT) and the Ministry of Corporate Affairs for the general information of members. Readers are requested to use the website links/ QR Codes to access the full text of the desired circular/notification/press release.

**Income Tax Updates**

- The CBDT has extended the due date of furnishing of Return of Income, which are due for filing by 31st July 2025, to 15th September 2025.
- Ø The CBDT has notified the new ITR- 1 to ITR- 7, ITR-U (ITR for Updated Return) and ITR-V (Verification Form) and ITR Acknowledgement for A.Y. 2025-26. The CBDT has also released Excel Utilities of ITR-1 and ITR-4 for AY 2025-26.

**MCA Updated**

- MCA has extended the due date for filing Form CSR-2 for the F.Y. 2023-24 to 30th June 2025.
- The MCA is set to launch a final set of 38 Company Forms consisting of 13 Annual Filing Forms and 6 Audit/Cost Audit related forms on the MCA21 V3 Portal on 14th July 2025. Following are important timelines and instructions given by the MCA:

  1. Company e-Filings on V2 portal will be disabled from 18th June 2025. Offline payments in V2 using Pay later option will be stopped from 08th June 2025

  2. The MCA V3 portal will be unavailable from 9th July 2025 to 13th July 2025.

  3. In view of the upcoming launch, V3 portal will not be available from 09th July 2025 12:00 AM to 13th July 2025 11:59 PM. Accordingly, stakeholders are advised to plan and file/resubmit current V3 forms before 09th July 2025 as there will be no waiver of fees or extension of resubmission period, if the due date/resubmission date fall within the mentioned downtime period i.e. 09th July 2025 12:00 AM to 13th July 2025 11:59 PM.

  4. Stakeholders are advised to create user ID/upgrade existing V2 ID/Merge V2 ID in V3 system under 'Business user' category and associate the DSC if not already done.

  5. Stakeholders are requested to check the SRNs that are currently pending with status 'Pending for upload of Investor details', 'Pending for Subsidiary Details' and upload the details by using services available on MCA portal ['Upload details of Security Holders/Depositors' and 'Update Subsidiary Details'] by 17th June 2025, failing which SRN will be marked under 'NTBR' status.

**Important Links:**

| Income Tax Updates | MCA Updates | ICAI Updates |
|---|---|---|
| https://bit.ly/2LZIZmH | https://bit.ly/2AUnLFN | https://bit.ly/2XydhU6 |

# Case Law Updates May 2025

-CA. Atul Joshi

## Income Tax Cases

**Citation:** 174 taxmann.com 154
**Case Name:** Mahindra & Mahindra Ltd. vs. Commissioner of Income-tax
**In favour of:** assessee
**Appeal No:** 416 of 2003,IT APPEAL NO. 416 OF 2003
**Decision Date:** 02-05-2025

**Head Note:**

1) Where assessee-company had incurred expenditure towards maintenance of its subsidiary company (MMC) which was in process of being wound up, since assessee was managing agent of MMC and it had also held substantial portion of equity capital of MMC, expenditure incurred was wholly incurred for purpose of commercial expediency and was eligible for deduction as business expenditure

2) Assessing Officer does not have jurisdiction to question correctness of profit and loss account prepared by assessee and certified by statutory auditors and he does not have jurisdiction to go behind net profit shown in profit and loss account except to extent provided in Explanation to section 115J

**Facts:**

- The assessee-company promoted its subsidiary company MMC. Due to severe recession, MMC started making losses and was wound-up. The assessee-company agreed to incur expenditure for maintenance of MMC till affairs of MMC were wound up and same was claimed as deduction.
- The Assessing Officer naoted that the assessee had placed deposits with certain concerns, who had declined to pay the deposits and interest on the ground that the deposits were linked to the amounts provided to MMC by them. He further noted that said amount of deposit and interest due to the assessee had been adjusted by various concerns against loan given by them to MMC. Therefore, the assessee could not claim to have not recovered its dues.
- He was of the view that the assessee had liquidated the liability of MMC which act was for consideration other than business. The Assessing Officer, therefore, disallowed a sum of Rs.49.18 lakhs claimed under the head miscellaneous expenses as well as a sum of Rs. 200.47 lakhs claimed by the assessee on account of deduction of write-off of deposits and interest.
- On appeal, the Commissioner (Appeals) held that the assessee did not incur the expenditure to carry on the business of the MMC. Therefore, the expenses incurred by the assessee were not admissible under

section 37(1). The Commissioner (Appeals) while computing the book profit under section 115J disallowed certain deductions claimed by the assessee.

- On appeal, the Tribunal confirmed the order of the Commissioner (Appeals).
- On appeal to the High Court:

**Held**

I. Allowability of expenditure

- Admittedly, MMC is a subsidiary of the assessee and assessee holds 27 per cent equity capital of MMC since its incorporation. The assessee promoted the MMC on 15-5-1946. From the date of incorporation of the assessee, it was the managing agent of the MMC and the assessee has acted as a managing agent till 1974 when the Companies Act, 1974 abolished the Managing Agency System. However, due to severe recession in the textile industry, MMC started making losses. Thereupon, the MMC was wound-up. The assessee, in its board meeting held on 27-3-1989 agreed to incur expenditure for maintenance of MMC. Thereafter on 10-7-1990 the Board of Directors of the assessee agreed to resolve the dispute to meet the expenditure till the affairs of MMC were wound-up. The Board of Directors approved the expenditure of Rs. 49.19 lakhs made by the assessee in the previous relevant assessment year 1990-91. The assessee held substantial portion of equity capital of MMC and MMC was regarded in public and official circles as a Mahindra Company. The assessee, in order to protect and preserve the assets and to protect the value of goodwill attached to the assessee by various sections of the society and on the ground of commercial expediency, incurred expenditure, which is permissible as deduction. [Para 13]
- The contention urged on behalf of the revenue in opposition to the aforesaid claim has already been dealt with by a Division Bench of this Court. Therefore, even otherwise, the assessee is entitled to deduction of sum of Rs. 49.19 lakhs as well as a sum of Rs. 200.47 lakhs. For the reasons assigned supra, the view taken in assessee's own case in Mahindra & Mahindra Ltd. v. CIT [2023] 151 taxmann.com 332/456 ITR 723 (Bom.) in respect of the previous assessment year, even otherwise squarely applies in respect of the substantial question of law. Therefore, there is force in the submissions made by the assessee that the substantial question of law deserves to be answered in favour of the assessee. [Para 14]
-

I. Whether the Assessing Officer, while determining the book profit under section 115J of the Act, can question the correctness of the profit and loss account prepared and certified by the statutory auditors of the appellant company as having been prepared in accordance with the requirements of Parts II and III of Schedule VI to the Companies Act, 1956?

- Section 115J mandates that in case of a company whose total income as computed under the provisions of the Act is less than 30 per cent of the book profit, the total income chargeable to tax will be 30 per cent of the book profit, as shown in the profit and loss account prepared in accordance with the provisions of Parts II and III of Schedule VI of the Companies Act, 1956, after certain adjustments. Explanation to section 115J(1A) provides that net profit so computed is to be increased by certain amounts and it is to be reduced by certain amounts which are mentioned therein. The provision does not contain any reference to concept

of "above the line" or "below the line". [Para 16]

- The Supreme Court, in Apollo Tyres Ltd. v. CIT [2002] 122 Taxman 562/255 ITR 273 (SC) dealt with the issue whether the Assessing Officer can question the correctness of profit and loss account prepared by the assessee and certified by the statutory auditors of the company as having been prepared in accordance with the requirements of parts II and III of Schedule VI to the Companies Act. It was held that sub-section (1A) of section 115J mandates the company to maintain its accounts in accordance with the requirements of Companies Act and is bodily lifted from the Companies Act into the Act of 1961 for the limited purpose of making the said account so maintained as a basis for computing the company's income for levy of income-tax. It was also held that the provision does not empower the authority under the Act to probe into the account accepted by the authorities under the Companies Act. It was also held that if the legislature intended the Assessing Officer to reassess the company's income, then it would have stated in section 115J that 'income of the company is accepted by the Assessing Officer'. The aforesaid principle was reiterated by the Supreme Court in Malayala Manorama Co. Ltd. v. CIT [2008] 169 Taxman 471/300 ITR 251 (SC). Thus, from the aforesaid enunciation of law by the Supreme Court, it is evident that the Assessing Officer does not have jurisdiction to go behind the net profit shown in profit and loss account except to the extent provided in Explanation to section 115J. For the aforementioned reasons the substantial question of law also deserves to be answered in favour of the assessee. [Para 17]

**Citation:** 175 taxmann.com 528
**Case Name:** Nimesh Sharad Shah vs. Assistant Commissioner of Income-tax
**In favour of:** revenue
**Appeal No:** 18988 of 2024,WRIT PETITION (L) NO. 18988 OF 2024
**Decision Date:** 05-05-2025

**Head Note**

Where assessee filed instant writ petition challenged notice issued under section 148 on ground that said notice was erroneous as certain transactions had been referred to twice in 'information' based on which impugned reopening proceedings were initiated, since ultimately, there was any error or not would had to be adjudicated during reassessment proceedings for which assessee would be offered a full opportunity, thus, this Court would not interfere at this stage and matter was left open to be considered by Assessing Officer.

**Facts**

- The assessee filed return of income for relevant year and same was accepted. Subsequently, a notice was issued under section 148 against assessee on ground that an information was received as per scheme notified under section 135A to effect that certain transaction entered by assessee was not disclosed in the return.
- The assessee filed instant writ petition challenging notice issued under section 148 on ground that certain transactions were referred to twice in the 'information' based on which the impugned proceedings were

initiated and that the statement about the mismatch between the information and the returns filed by the assessee was erroneous. The assessee also argued that they were not given an opportunity to contest the reasons for the notice.

- Regarding the merits of the challenge to the impugned notice, it is found that the only argument raised is that the statements in such notice are erroneous. The petitioner submitted that the detailed reply was filed to the notice pointing out the errors, but the impugned notice is still being proceeded with. The respondents have filed an affidavit denying that the statements in the impugned notice are erroneous or that there is any duplication as alleged. [Para 8]
- This is also not a case where the petitioner is deprived of an opportunity to make his defense good. Full opportunity is contemplated in the reassessment proceedings. The revenue, also reiterated that full opportunity will be granted to the petitioner to put forth his case. This would include an opportunity to demonstrate the errors, if any, in the impugned notice. Therefore, there is no scope to allege breach of natural justice at this stage. [Para 10]
- Based on the arguments raised, no jurisdictional error or assumption of jurisdiction not vested in the authority that issueed the impugned notice could be detected. Since this matter involves adjudication of factual issues or disputed issues of fact, and since the petitioner will be granted full opportunity during the reassessment proceedings, no case is made out to interfere with the impugned notice. [Para 11]
- In Bennaifer Vispi Patell v. Co-ordinate Bench (supra), the Co-ordinate Bench left the issue of the constitutional validity of section 113A open. This is because in the case facts, the Co-ordinate Bench found sufficient grounds for interfering with the impugned notice under section 148. In particular, the Co-ordinate Bench referred to paragraphs 11 and 13 of the Revenue's affidavit-in-reply in which the Revenue had fairly admitted that there was no discrepancy in the interest income as was disclosed by the petitioner in the said petition. On an affidavit, the Revenue has stated that the petitioner had correctly disclosed her interest income in the return of income. Further, in paragraph 11 of the affidavit-in-reply filed in the said petition, it was admitted that the actual interest accrued by the petitioner was e-verified from the system. It was found that as on the date, the amount of interest reflected in the system was only Rs. 88,000/- and not Rs. 2,64,000/- as was reflected in the system previously. [Para 12]
- Thus, in the case of Bennaifer Vispi Patell (supra), there was an admission about the errors in the impugned notice. In the affidavit-in-reply filed on behalf of Respondent-Revenue on record of the said petition, such errors were acknowledged, and the clear statement was made that there were no discrepancies in the interest income. In this factual background, the impugned notice was set aside without going into the issue of constitutional validity of section 113A. [Para 13]
- As noted earlier, there is no challenge to the constitutional validity of section 113A in the present case, and the grounds raised do not disclose any ex facie error. Whether ultimately, there is any error or not will have to be adjudicated during the reassessment proceedings for which the petitioner would be offered a full opportunity. If the petitioner's case on fact is ultimately accepted during the reassessment proceedings, there would be no reason to challenge the constitutional validity of section 113A. In the absence of any

jurisdictional infirmity, we decline to entertain this petition. [Para 14]

- However, we clarify that nothing in this order is intended to influence the reassessment proceedings. The observations in this order, if any, are only in the context of entertaining the challenge to the impugned notice at the threshold. All contentions of all parties on the merits are therefore left open. [Para 15]
- Accordingly, this petition is dismissed. The interim order granted earlier is vacated. [Para 16]

**Citation:** 174 taxmann.com 340
**Case Name:** Fcbulka Advertising (P.) Ltd. vs. Assistant Commissioner of Income-tax
**In favour of:** revenue
**Appeal No:** 3442 of 2022, WRIT PETITION NO.3442 OF 2022
**Decision Date:** 07-05-2025

**Head Note**

Where assessee paid DDT on dividend declared and paid to its shareholder, Mauritius based company, at an effective rate of 20.358 per cent and claimed refund of excess DDT paid as per article 10(2) of India-Mauritius Tax Treaty, since communication issued by Assessing Officer stating that assessee's claim had been examined and found correct and refund due was determined at Rs. 20.73 crores was not a final determination on refund issue, Assessing Officer was to be directed to pass a final order determining refund claim of assessee

**Facts**

The assessee was a wholly owned subsidiary of ACSL Mauritius. During the previous year relevant to the assessment year 2018-19, the assessee declared and paid a dividend of Rs. 205 crores to its shareholder ACSL Mauritius. The assessee paid Dividend Distribution Tax (DDT) of Rs. 27 crores under section 115-O at an effective rate of 20.358 per cent.

Subsequently, the assessee claimed to have realized that DDT paid at 20.358 per cent was erroneous since, as per article 10(2) of the Treaty between India and Mauritius, they should have paid tax at the rate of 5 per cent only. Therefore, on 10-10-2018, claim for refund of excess DDT was made by a letter addressed to the Assessing Officer. In the said letter, the assessee submitted that they were liable to pay DDT as per India-Mauritius Tax Treaty at the rate of 5 per cent only, however, they had paid DDT at the rate of 20.358 per cent and, therefore, they were entitled to claim refund of the excess DDT of Rs. 20 crores. The assessee also stated that Form ITR-VI did not have any provision for a claim of refund of excess DDT; therefore, the claim was made by way of said letter. The assessee also requested the opportunity for a hearing in the said letter.

On 29-11-2018, the Assessing Officer replied to the assessee"s aforesaid refund claim. The claim for grant of refund in the present petition was based on the said letter. Thereafter, the assessee vide various letters requested and reminded the Assessing Officer to grant the refund along with interest based on the above communication dated 29-11-2018. However, there was no reply to these letters.

However, on 16-6-2022, the Assessing Officer replied to the aforesaid request of the assessee and rejected the claim of the refund on the ground that reply dated 29-11-2018, based on which the refund was requested, was

not a statutory order passed under the relevant section of the Act and, therefore, effect could not be given to such communication of 29-11-2018. It further stated that no section was mentioned in the communication dated 29-11-2018 under which the same was passed, and no computation sheet was attached.

The said communication of 16-6-2022, which was impugned in the present petition, requested the assessee to file rectification application under section 154 specifying the order which was to be rectified for arriving at the refund or to claim the refund under section 237 along with supporting documents. Being aggrieved by the communication dated 16-6-2022, the assessee had instituted the present petition challenging its correctness and further seeking direction to the Assessing Officer to grant a refund in terms of the communication dated 29-11-2018, along with interest.

**Held**

- The impugned communication dated 16-6-2022 rejects the petitioner's claim for refund inter alia on the ground that previous communication dated 29-11-2018 is not a statutory order of refund made under any of the provisions of the Act but it is just the expression of the tentative opinion in response to petitioner's application for refund which was not even made in the statutory form or after complying the statutory procedures under sections 237 and 239 of the Act. This impugned communication rejects the refund claim on the ground that the earlier communication dated 29-11-2018 was not some order under sections 143(3)/154/250/254/143(1), etc. The impugned communication also reasons that the communication dated 29-11-2018 did not specify the sections under which it was issued, nor was any computation sheet annexed thereto. The impugned communication finally directs the petitioner to file a rectification application under section 154 or to take out proceedings under section 237, claiming a refund. [Para 13]
- Apart from the above reasons reflected in the impugned communication dated 16-6-2022, the revenue urged that refund was rejected because the Petitioner failed to file a return of income and claim such refund, which according to him, was the only mode allowable under Section 237 read with Sections 237 and 239 read with Rule 41 of the Income Tax Rules. He submitted that even on merits, the Petitioner was not entitled to any refund under the Double Tax Avoidance Agreement between India and Mauritius. He emphasised Article 10 of the India-Mauritius Tax Treaty [Para 14]
- At the outset, it is not clear as to whether it is open to the Revenue to urge reasons or grounds other than those reflected in the impugned communication to support the said impugned communication. Normally, the validity of such communications would have to be tested on the grounds or reasons reflected therein and not by grounds added or supplemented through affidavits or oral contentions when a challenge is raised to such communications.[Para15]
- There is uncertainty because an argument was made on behalf of the revenue that even the impugned communication dated 16 -6-2022 may not be a statutory order rejecting the Petitioner's claim for refund. Furthermore, the impugned communication is more of a response to the Petitioner's reminders concerning the implementation of the communication dated 29-11-2019. The assessee,however, maintained that the impugned communication was statutory order and that the reasons provided could not be supplemented when a challenge was presented against it.[Para 16]

- In any event, upon considering the matter from the two different perspectives, for reasons discussed later, the Petitioner's refund claim cannot be said to have been finally rejected or the Respondents cannot finally reject the Petitioner's refund claim based on the grounds in the impugned communication dated 16-6-2022 the grounds attempted to be supplemented later. In either event, the impugned communication is vulnerable and warrants interference.[Para 17]
- Firstly, the principles of natural justice and fair play were not complied with before the issuance of the impugned communication dated 16 June 2022. The petitioner was not heard prior to the issuance of the impugned communication dated 16-6-2022. The tentative reasons why the respondents believed that no refund was due to the petitioner were not disclosed to her. The petitioner was not given an effective opportunity to address these tentative grounds orreasons. This constitutes a valid basis for setting aside the impugned communication dated 16 June 2022.[Para 18]
- Secondly, nothing in the impugned communication suggests that the rejection was based on the Respondents" belief that no refund was due and payable to the Petitioner. As discussed later in the context of the communication dated 29-2- 2018, there is nothing conclusive regarding the Petitioner's entitlement to such a refund after the authority verified the Petitioner's status regarding the claim made and the provisions of the treaty. [Para19]
- The impugned communication mainly states that the communication dated 29 November 2019 was not a statutory order; therefore, based on the same, any claim for refund cannot be allowed. This means that even the impugned communication does not examine the Petitioner's claim for refund on merits and takes any stand that the petitioner was dis-entitled to a refund on merits.[Para20]
- Thus, the impugned communication, while rejecting the Petitioner's contention that the issue of refund stood concluded by the communication dated 29-11- 2018, does not independently decide one way or the other on the merits of the Petitioner's claim for refund. Even the supplemented grounds urged in the revenue's affidavit during the arguments mainly concern alleged non-compliance with procedural requirements or the non-citation of statutory provisions. But there is no examination of the refund claim on merits by adverting to the transaction and the corresponding provisions of the treaty by which they were governed.[Para21]
- Therefore, examining the matter from the above perspectives, and for the reasons discussed above, the impugned communication dated 16 -6-2022 must be set aside. [Para23]
- The next issue that needs consideration concerns the legal status of the communication dated 29-11-2018.[Para24]
- Admittedly, on a perusal of the communication dated 29-11-2018, there is no mention of any section under which it was issued. However, merely because there is no reference to the section under which the said communication was issued cannot be reason enough to conclude that it is not a statutory order. The reference to a section or provision is also inconclusive on such an issue. Neither did the petitioner quote any specific section, article or legal provision when applying for a refund, nor does the communication dated 29-11-2018 quote any in response. [Para 25]
- Section 237 provides that if a person "satisfies" the Assessing Officer that the amount of tax paid by him

exceeds the amount with which he is properly chargeable under this Act for that year, he shall be entitled to a refund of the excess. In the instant case, the petitioner made the claim for the refund of DDT on 10-10-2018, and it was specifically stated that such a claim is made because there is no provision in Form ITR-VI to claim a refund of DDT. Respondents have neither disputed the non-provision in the ITR form to claim a refund of DDT till the filing of the reply to this petition, nor is it the basis which can be found in the impugned communication dated 16-6-2022. [Para 29]

- Section 237 requires "satisfaction" of the Assessing Officer that the amount paid is more than what is chargeable under the Act and, therefore, the person is entitled to a refund of the excess. Such an important "satisfaction" must be an unequivocal and final determination after proper adjudication on the application made by an assessee for the refund. Furthermore, such "satisfaction" must be in writing by way of an order in which the Assessing Officer must give his reasons for either accepting or rejecting the refund claim. This is necessary because there should be no ambiguity on whether the Assessing Officer was passing some statutory order capable of legal consequences or was merely expressing his tentative opinion or responding to the refund claim application. [Para 30]
- Such satisfaction must be formally expressed because neither party should be kept guessing or be prejudiced in resorting to the remedies that the law provides against such determination. For instance, section 246A provides for appealable orders before the Commissioner (Appeals) and section 246A(1)(I) refers to an order made under section 237 as an appealable order. [Para 31]
- Therefore, since the adjudication/ determination of the entitlement under section 237 is an appealable order, it follows that there must be a written communication in which there is a final determination of the entitlement or disentitlement supported by reasoning so that the appellate authority can test it. there must be an "order" under section 237. Such an order must be a conclusive and final determination of the entitlement or disentitlement to a refund of the excess amount paid. The emphasis need not be on the form or citation of the relevant legal provision. But the essential attributes of conclusiveness must be reflected. The parties must know that a formal determination of the refund claim was being considered and dealt with, so that all aspects could be pointed out and considered. In this case, the order at least tentatively supports the assessee, but the shoe could as well be on the other foot on some other occasion. On perusal of the communication dated 29-11-2018 and on considering the circumstances in which it was made, it is challenging to elevate it to the status of a statutory order recording the satisfaction contemplated by section 237. [Para 32]
- Article 265 of the Constitution of India also provides that no tax shall be levied or collected except by authority of law. The phrase "authority of law" would mean liability/entitlement as per the Act. This would contemplate that before a person can be entitled to a refund, the Assessing Officer must satisfy that such an entitlement is in accordance with the provisions of the Act, and there must be a final determination of the correctness of the claim for refund. Based upon an inconclusive or tentative opinion of an Assessing Officer, no breach of Article 265 can be alleged or established. [Para 33]
- The communication dated 29-11-2018 in the first paragraph states that the claim of refund has been considered by respondent No.1. In paragraph 2, the details of the dividend paid and received are stated. In paragraph 3, respondent No.1 records that the petitioner has made a claim that dividend income paid to

ACSL Mauritius "should be circumscribed at the rate of 5 per cent as per article 10 of the India-Mauritius Tax Treaty" and such a claim has been examined and found correct. However, after stating so, respondent No.1 has qualified by stating that the refund "due" is on "preliminary verification determined at Rs. 20.73 crores" and further the refund would be taken up for "processing" and issued after adjustment of past demands, if any. This is hardly conclusive. [Para 34]

- If the communication dated 29-11-2018 is an order, it being like a preliminary, prima facie, or interlocutory order and not a final order, the petitioner cannot base their claim on this communication to allege breach of article 265 of the Constitution. The communication dated 29-11-2018 is based on preliminary verification and is subject to processing, and therefore, it is in the nature of a preliminary/prima facie/interlocutory order. Respondent No.1 should and ought to have passed a final order so that there would be no ambiguity on the issue, and such a determination would be capable of legal consequences, including resort to remedies under the law. Article 265 cannot be invoked relying almost entirely on such communication, which is based on preliminary verification and further processing. [Para 35]
- An "order" to be treated as such must decide matters affecting the valuable rights of an assessee and should satisfy the requirement of finality, which is absent in the communication dated 29-11-2018. The said communication dated 29-11-2018 is not a command or direction authoritatively given for the grant of a refund. An order based on which a claim for refund is made should conclusively find that the refund is "due," thereby putting the issue of entitlement to rest. Suppose the claim relies entirely on a document based on preliminary verification and further processing. In that case, it cannot be said that the refund is due to such a claimant, and it is being withheld in breach of article 265 of the Constitution of India. [Para 36]
- The communication dated 29-11-2018 cannot be read by picking up one sentence in isolation, but would have to be read in its entirety, not ignoring the context. On a holistic reading of the entire communication dated 29-11-2018, what appears to have been said by respondent No.1 is that the determination of refund is based on preliminary verification and is subject to further processing. The communication dated 29-11-2018 appears to be akin to an interlocutory/preliminary order wherein a prima facie view is expressed by respondent No.1 on the issue of refund. However, the communication dated 29-11-2018 cannot be treated as a final and conclusive determination of the entitlement of the petitioner to the refund. This is because respondent No.1 states that on preliminary verification, the refund is determined at Rs. 20.73 crores, and further it states that the same would be taken up for processing. [Para 37]
- The sentence "the claim has been examined and found correct" cannot be read in isolation de hors the subsequent statement, which states that the refund due on preliminary verification is determined at Rs. 20.73 crores and the same would be taken up for processing. [Para 38]
- Communication dated 29-11-2018 should have been followed up by respondent No.1 by issuing a final and conclusive order. In this instance, respondent No.1 has not taken any steps after the communication dated 29-11-2018 to verify the refund claim. The delay on the part of respondent No.1 in carrying out the verification and passing a final and conclusive determination through an order cannot be attributed to the petitioner. However, because such an exercise was not performed by respondent No.1, the communication dated 29-11-2018 cannot be regarded as a final determination culminating in an order as contemplated

under section 237 read with section 246A. If, upon final determination, a refund is found conclusively due, surely interest can be awarded to the petitioner. [Para 39]

- Section 237 refers to the phrase "satisfied". The phrase satisfaction means fully and conclusively satisfied and not a prima facie satisfaction. On a reading of communication dated 29-11-2018, it cannot be said that respondent No.1-Assessing Officer was fully satisfied with the entitlement of the petitioner to the refund. This is so because the said communication specifically states that it is based on preliminary verification and is subject to further processing. Therefore, the communication dated 29-11-2018 cannot be treated as meaning that the Assessing Officer is satisfied as contemplated under section 237 to the entitlement of the refund. Furthermore, since it is in the form of interlocutory/preliminary/prima-facie communication, the same also cannot be considered an "order". The reading of the communication dated 29-11-2018 would only mean that prima facie, respondent No.1 found the claim to be correct on preliminary verification. [Para 40]
- There is no dispute that respondent No.1 has the authority to pass a final order granting a refund. This would encompass preliminary, or prima facie, orders, and such orders are subject to verification and statutory limitations. The initial or prima facie orders are provisional and tentative but do not constitute final adjudication and can be modified upon detailed examination. This communication, dated 29-11-2018, cannot be construed as a final adjudication order accepting the petitioner"s plea for the refund claim. [Para 41]
- Therefore, since the communication dated 29-11-2018 does not specify conclusively the entitlement of the petitioner to the refund claim, it cannot be considered as a final determination culminating in a final "order" under section 237 admitting the entitlement to a refund of the excess DDT. However, the reasoning in the impugned communication dated 16-6-2022 which states that since there is no mention of the section in the communication dated 29-11-2018, the same does not constitute an order is not agreeable. Mere non-mentioning of any section would not mean that a communication finally determining the rights and liabilities of an assessee cannot be treated as an order. However, there is no final determination in the instant case, and therefore, the essential attribute of a conclusive order is missing. [Para 42]
- The issue of whether DDT is covered by the provisions of the Double Taxation Avoidance Agreement is pending in the cases of other assessee before various forums across the country, including this Court. Therefore, it would not be appropriate to delve into this issue for the first time and embark upon deciding the issues of eligibility or entitlement to a refund under the treaty for the first time. [Para 43]
- The second issue concerning the status of communication dated 29-11-2018 is decided in the above terms. The said communication cannot be regarded or elevated to the status of some statutory order conclusively or finally determining the issue of refund entitlement. [Para 45]
- Finally, the question is whether the petitioner has made out a case for the issue of a writ of mandamus for the grant of a refund of Rs. 20.73 crores solely based on the communication dated 29-11-2018. [Para 46]
- Having regard to the legal status of the communication dated 29-11-2018, obviously, based on the communication dated 29-11-2018, no mandamus can be immediately issued directing refund of the amount of Rs. 20.73 crores. Some Competent Authority would have to conclusively determine issues of eligibility and entitlement for refund, examine the merits of the contention based upon which the refund is applied,

and pass an appropriate order on the refund issue. Such an order will no doubt have to be made after giving the petitioner full opportunity and considering all relevant material, including the transactions and the treaty's provisions. Since in this case, there is no final determination that refund was indeed due and payable to the petitioner, no case is made out for the issue of writ of mandamus to direct the respondents to refund the amount of Rs. 20.73 crores to the petitioner based solely on the communication dated 29-11-2018. [Para 47]

- Though, for reasons discussed earlier, the impugned communication dated 16-6-2022 is to be quashed and set aside, a writ of mandamus cannot issue as a corollary to such quashing. The quashing of the impugned communication dated 16-6-2022 does not revive the communication dated 29-11-2018 or in any event does not confer upon the communication dated 29-11-2018 some statutory character of a refund order or some communication finally determining that refund of Rs. 20.73 crores was due and payable to the petitioner without the necessity of any further verification or adjudication. [Para 48]
- In exercising discretionary jurisdiction under article 226, it must be remembered that discretion is exercised on equitable principles. If, upon quashing an impugned order, another illegal order, ultra vires, or inequitable revives, then the Court is not bound to exercise its discretion and permit such illegal, ultra vires, or inequitable order to prevail or revive. While it is not suggested that the impugned communication dated 29-11-2018 is unlawful or ultra vires, it is to be held that the communication dated 29-11-2018 is neither a statutory order nor a final determination on the refund issue. Therefore, upon quashing of the impugned communication dated 16-6-2022, a writ of mandamus for refund cannot be immediately issued by relying entirely on the communication dated 29-11-2018. [Para 49]
- Therefore, the communication dated 16-6-2022 must be quashed and set aside for all the above reasons. However, the communication dated 29-11-2018 cannot be treated or elevated to the status of a final and conclusive determination of the petitioner"s entitlement to a refund. No mandamus can be issued based entirely or solely on the said communication. [Para 51]
- Therefore, this petition is disposed of by passing the following order: - (i) Communication dated 16-6-2022 is quashed and set aside. (ii) Communication dated 29-11-2018 cannot be treated or elevated to the status of a final and conclusive determination of the petitioner"s entitlement to a refund. (iii) The first respondent is now directed to pass a final order determining the refund claim of the petitioner, within eight weeks from today, after giving the petitioner the opportunity of hearing and by passing a speaking order. All contentions on merits are left open. (iv) If the petitioner is found to be entitled to the claim of refund, interest at the appropriate rate must be granted to the petitioner from 10-10-2018 till the grant of refund, and the time taken for not passing the final order would not be attributable to the petitioner. [Para 52]

**Citation:** 174 taxmann.com 837
**Case Name:** Arjun Amarjeet Rampal vs. Income-tax Department
**In favour of:** assessee
**Appeal No:** 2579 of 2025, WRIT PETITION NO. 2579 OF 2025
**Decision Date:** 16-05-2025

**Head Note**

Where Magistrate mechanically passed order issuing non-bailable warrant against petitioner in a bailable offence under section 276C(2), impugned order was to be quashed and set aside

**Facts**

- The Additional Chief Metropolitan Magistrate issued a non-bailable warrant against the petitioner for offence punishable under section 276C(2).
- The petitioner filed instant petition under section 482 of Code of Criminal Procedure, 1973 and under section 528 of Bharatiya Nagarik Suraksha Sanhita, 2023 assailing order of issuing process against the petitioner and order passed by the Additional Chief Metropolitan Magistrate issuing non bailable warrant against the petitioner.

**Held**

- Having perused the provisions of section 276C(2) under which the maximum sentence is only three years and the offence is bailable in nature, which the parties would not dispute. [Para 3]
- The Magistrate however not taking into consideration such position, has mechanically passed the order issuing the non-bailable warrant against the petitioner in a bailable offence. On a perusal of the said order, it is clear that no reasons are recorded. It is a cryptic order which lacks application of mind. This would cause prejudice to the petitioner in the given the facts and circumstances as he would face an order of non-bailable warrant in a case of bailable offence.[Para 4]
- In such circumstances, such order would be contrary to law. [Para 5]
- In the above facts and circumstances, interest of justice would be served by passing the following order:- i. The order dated 9-4-2025 passed by the Additional Chief Metropolitan Magistrate, 38th Court at Ballard Pier, Mumbai is quashed and set aside. ii. This order will not affect the proceedings on merits filed before the Magistrate which shall continue in accordance with law. [Para 6]

**Citation:** 174 taxmann.com 750
**Case Name:** Sai Shirdi Constructions vs. Income-tax Officer-28(3)(1)
**In favour of:** assessee
**Appeal No:** 102 of 2016,1233 of 2016, WRIT PETITION NO. 1233 and 102 OF 2016
**Decision Date:** 21-05-2025

**Head Note**

Where assessee opted to settle case of quantum assessment under DTVSV 2024 and only order for full and final settlement of tax arrears under sub-section (2) of section 92 read with section 93 of Finance (No.2) Act, 2024 was awaited, pending appeal of assessee filed before Tribunal was to be withdrawn

**Facts**

- The assessee had opted to settle the case of quantum assessment under DTVSV 2024 and accordingly filed the Form 1 under DTVSV 2024 for the settlement of the disputes.
- The Principal Commissioner had issued the Form-2.
- Accordingly, the assessee had requested withdrawal of appeal filed before Tribunal.

**Held**

- As per the provisions of section 91(2) of the DTVSV Scheme, 2024, any appeal pending before the ITAT or Commissioner (Appeals) in respect of disputed interest or disputed penalty or disputed fee or tax arrears shall be deemed to have been withdrawn upon the issuance of certificate under section 92(1) of the DTVSV Scheme, 2024. [Para 5]
- On going through the letter along with the enclosures filed on 5-3-2025, it is found that the Form No.2 i.e. Certificate under sub-section (1) of section 92 of the Finance (No.2) Act, 2024, is issued by the Principal Commissioner on 20-1-2025. Further, intimation of payment under sub-section (2) of section 92 of the Finance (No.2) Act, 2024 is filed by the assessee on 4-2-2025 vide acknowledgement No.858981110040225 and accordingly the Form No.4 i.e. Order for full & final settlement of tax arrears under sub-section (2) of section 92 read with section 93 of the Finance (No.2) Act, 2024 is awaited. This being so, accordingly, as per the request letter dated 5-3-2025, this appeal of the assessee for the assessment year 2016-17 is dismissed as withdrawn. [Para 5.1]

# Case Law Updates May 2025

-CA. Atul Joshi

## GST Cases

**Citation:** 174 taxmann.com 773
**Case Name:** Shubh Corporation vs. State of Maharashtra
**In favour of:** assessee
**Appeal No:** 5183 of 2025, WRIT PETITION NO. 5183 OF 2025
**Decision Date:** 07-05-2025

**Head Note:**

Where only search operation was concluded and there was no determination of tax amount nor was Petitioner called upon to show-cause or any proceedings for raising demand was filed and further, there was no material which led Commissioner to believe that attachment was necessary to secure interest of Revenue, order provisionally attaching bank account was to be set aside

**Facts:**

- 1) During search of assessee's business premises, revenue found two Backhoe Loaders (JCB)
- 2) Impugned order was passed attaching assessee's bank account under section 83
- 3) Assessee contended that no tax amount had been determined or demanded from assessee and Commissioner had no material to form opinion that attachment of bank account was necessary to protect interest of Government Revenue

**Held**

1) Power to cause attachment of a bank account is drastic in nature, inasmuch as, it could in certain situations, bring business of a taxable person to a grinding halt

2) Before attachment is levied, Commissioner has to form an opinion that for purpose of protecting interest of Government Revenue, it is necessary to attach any property, including bank account of taxable person

3) This opinion has to be based on material, and cannot be on basis of assumptions and presumptions of Commissioner

4) In instant case, proceedings under Section 67 stood concluded and there was no determination of any tax amount, or even calling upon Petitioner to show-cause as to why any tax amount ought not to be recovered from him

5) No proceedings for raising a demand on Petitioner had been filed till date

6) Impugned order did not set out any material which formed basis of opinion for attaching bank account of assessee
7) No material which led Commissioner to believe that attachment was necessary to secure interest of Revenue was communicated to assessee
8) Impugned order was to be set aside

**Citation:** 174 taxmann.com 768
**Case Name:** Power Engineering (India) Pvt Ltd vs Union of India
**In favour of:** assessee
**Appeal No:** WRIT PETITION NO. 1718 of 2024
**Decision Date:** 07-05-2025

**Head Note:**
Where by a communication, petitioner was requested to clarify about refund of IGST and by another communication was requested to provide copies of documents and without issuing/serving any notice or statement as required under section 73, authorities had straight away drawn a conclusion that petitioner had wrongly availed refund, in absence of adhering to procedure prescribed under Act, matter was to be re-adjudicated

**Facts:**
- 1) By a communication, petitioner was requested to clarify about refund of IGST and by another communication was requested to provide copies of documents
- 2) Thereafter, impugned order was passed fastening liability on assessee holding IGST refunds sanctioned from 2017-18 to 2021-22 in violation of Rule 96(10), which was brought into force w.e.f. 9-10-2018

**Held**
1) Section 73 contemplate determination of tax pertaining to period upto 2023-24, either not paid or short paid or erroneously refunded and proper officer shall serve notice on concerned person to show cause as to why he should not pay amount specified in notice
2) Admittedly, procedure was not availed into as it was evident that notices issued to assessee were not in form of show cause notice, neither amount was specified therein
3) Therefore, impugned order was to be set aside by giving liberty to revenue to follow procedure under section 73/74

**Citation:** 174 taxmann.com 574
**Case Name:** Estate Investment Company Pvt Ltd vs Union of India
**In favour of:** assessee
**Appeal No:** WRIT PETITION (L) NO. 12207 OF 2025
**Decision Date:** 06-05-2025

**Head Note:**
Where release of lands, granted to assessee's predecessor under 999 years lease, in favour of occupants and/or encroachers were treated as an assignment of leasehold rights and brought to GST, considering that issue was already pending in High Court in several other Petitions, assessee was granted ad-interim relief

**Facts:**
- 1) Issue involved in present petition was whether Goods and Services Tax can be levied when Petitioner had executed release deeds in favor of occupants and/or encroachers of lands belonging to Petitioner and which was granted to its predecessors by Secretary of State for India in Council under an indenture of lease dated 7th November, 1870 for a period of 999 years
- 2) State, in adjudicating order, treated this release as an assignment of leasehold rights and hence brought it to tax under provisions of GST law
- 3) According to assessee, firstly, release deeds can never be construed as an assignment of lease
- 4) Without prejudice to aforesaid argument, it was case of assessee that even if one were to treat it as an assignment of leasehold rights, same would be squarely covered by a Division Bench decision of Gujarat High Court in case of Gujarat Chambers of Commerce and Industry v. Union of India (2025) 1 TMI 516

**Held**
1) This was an important issue that needed to be addressed by this Court
2) In fact, this issue had been raised in other Petitions as well - In case of Siemens Ltd. v. Union of India [Writ Petition No. 14434 of 2023], present High Court had stayed adjudication of Show Cause Notice issued to Siemens Ltd.
3) Considering that issue referred to above was already pending in High Court in several other Petitions including in Siemens Ltd. (supra), assessee here also was entitled to ad-interim relief
4) Accordingly, there would be ad-interim relief in terms of prayer clause

**Citation:** 174 taxmann.com 716
**Case Name:** B. Sorabji vs. Union of India
**In favour of:** assessee
**Appeal No:** 6041 of 2025, WRIT PETITION NO. 6041 OF 2025
**Decision Date:** 05-05-2025

**Head Note:**

Where lessee assigned leasehold rights of plot of land allotted on lease along with buildings constructed thereon to third party and adjudication order was passed considering same as supply of service, in view of fact that similar issue was pending in another matter, instant case was to be tagged with same and implementation of adjudication order was to be stayed

**Facts:**

- 1) Authorities considered assignment of lease hold rights of a plot of land allotted on lease by MIDC and buildings constructed thereon, by lessee to a third party, as a supply of service and accordingly, impugned adjudication order was passed

**Held**

1) Division bench of Gujarat High Court in Gujarat Chamber of Commerce and Industry v. Union of India [2025] 170 taxmann.com 251/94 GSTL 113 (Gujarat) had taken a view that in such assignment, provisions of section 7(1)(a) for scope of supply would not be applicable

2) Considering that one High Court had already taken a view, no contrary view was placed, it was an important issue that needed to be addressed

3) Further, issue had already been raised in Tokheim India (P.) Ltd. v. Union of India [2025] 174 taxmann.com 10 (Bombay), wherein, adjudication of show cause notice was stayed

4) Accordingly, instant case was to be tagged with matter in Tokheim India (supra) and implementation of impugned order was to be stayed

**Citation:** 174 taxmann.com 580
**Case Name:** IDP Education India Pvt Ltd vs. Union of India
**In favour of:** assessee
**Appeal No:** 2774 of 2024,5144 of 2022, WRIT PETITION NO. 5144 OF 2022 and 2774 OF 2024
**Decision Date:** 05-05-2025

**Head Note:**

Where assessee provided support services to foreign holding company with respect to Indian students taking admission in foreign universities and foreign company shared certain percentage of fee received by them from foreign universities wherein students with assessee studied, in view of fact that assessee did not have any contractual obligation either with universities or with students and it did not raise any invoice or receive any consideration from universities or students, assessee was not an intermediary; refund claim of IGST by assessee could not be rejected

**Facts:**

- 1) Assessee, a subsidiary of IDP Australia, was obliged to provide support services to IDP Australia with respect to Indian students intending to opt for courses offered by foreign universities
- 2) For said purpose, IDP Australia shared certain percentage of fee received by it from foreign students with assessee
- 3) Assessee did not have any contractual obligation with universities or with students and did not raise any invoice or receive any consideration from universities or students
- 4) Revenue rejected refund claim of IGST pad on supply of services to IDP Australia holding that assessee squarely fell within term "intermediary"

**Held**

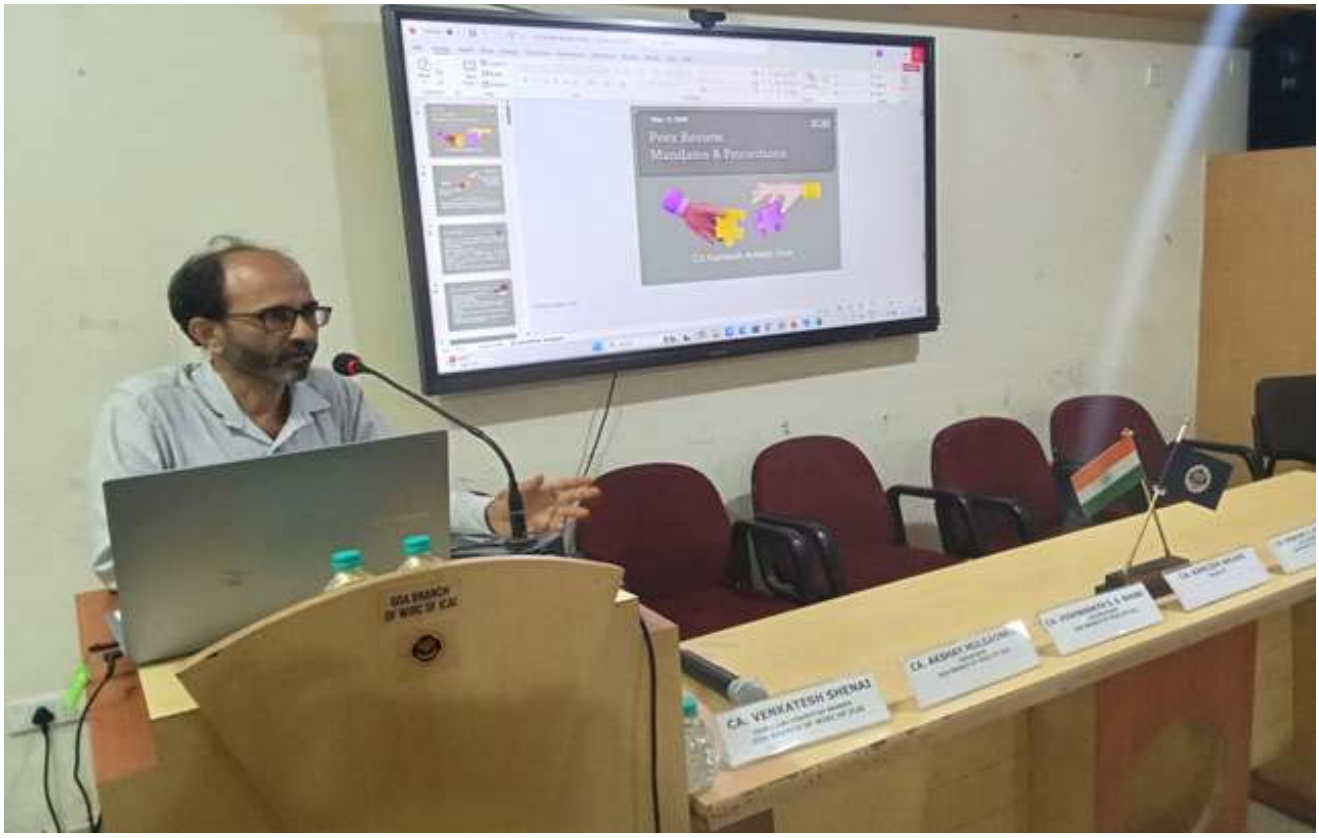
1) It was noted that in identical facts and circumstances in assessee's own case, CESTAT had given categorical finding that assessee was not an intermediary
2) There was no reason to take a different view, thus assessee was not an intermediary and was entitled to refund
3) In view of same, matter was to be remanded

# ACTIVITY REPORT MAY 2025

| Sr. No. | Date | Programme | Speakers | CPE Hrs. |
|---|---|---|---|---|
| 1 | 5th to 8th May 2025 | Goa Branch (WIRC) of ICAI & WICASA organised Mock Test Papers series II for May 2025 Foundation Examination | | Nil |
| 2 | 16th May 2025 | Goa Branch (WIRC) of ICAI organised Lecture Meeting on "Peer Review - Mandates & Procedures" | CA. Kamlesh Amlani | 3 Hrs. |
| 3 | 23rd to 25th May 2025 | Goa Branch (WIRC) of ICAI jointly with Udaipur Branch (CIRC) of ICAI organised Residential Refresher Conference<br><br>Companies ITR Filling<br><br>GST Return Filling & related Compliance of Companies & Applicability of Accounting Standards at time of Finalization of Accounts<br><br>MCS Annual Compliance | <br><br>CA. Abhishek Sancheti<br><br>CA. Himanshu Agarwal<br><br>CA. Ashis Ostwal | 12 Hrs. |
| 4 | 30th May 2025 | Goa Branch (WIRC) of ICAI organised Lecture Meeting on “Overview of TDS & TCS provisions, as applicable from 01.04.2025” | CA. Archana Kenkre | 3 Hrs. |

## Mock Test Papers series II for May 2025 Foundation Examination held from 5th to 8th May 2025

## Lecture Meeting on "Peer Review - Mandates & Procedures" held on 16th May 2025


CA. VENKATESH SHENAI

## Goa Branch jointly with Udaipur Branch (CIRC) of ICAI organised Residential Refresher Conference on 23rd to 25th May 2025


## Lecture Meeting on "Overview of TDS & TCS as applicable from 01.04.2025" held on 30th May 2025



Goa Branch (WIRC) of ICAI
Organises
Lecture Meeting on
'Overview of TDS & TCS Provisions
as applicable from 01.04.2025'
30th May 2025
Goa Branch Premises, Panaji, Goa
CA. SNEHA MENON


Goa Branch (WIRC) of ICAI
Organises
Lecture Meeting on
'Overview of TDS & TCS Provisions
as applicable from 01.04.2025'
30th May 2025
Goa Branch Premises, Panaji, Goa
CA. SNEHA MENON


Goa Branch (WIRC) of ICAI

# Birthday Wishes

VIJAY MUKUND KAMAT
01-MAY

PRADIP PANDURANG SHENVI KAKODKAR
03-MAY

GANPAT RATNAKAR KAPDI
03-MAY

GAYATHONDE DINESH CHANKRAPANI
04-MAY

ANIL RAMCHANDRA UPADHYE
07-MAY

PAI SANTOSH JAGANNATH
07-MAY

MAYA BRUNI DIAS
08-MAY

NARAYAN JEEWOTTAM PRABHUDESAI
08-MAY

ANKITA VIKAS KUMAR AGARWAL
08-MAY

UTTAM NARCINV BENE
10-MAY

RAMNATH MADHUSUDAN SHANBHAG
10-MAY

DATTA BINAYAK
11-MAY

JOVILYN MARIE PEREIRA
14-MAY

BHAT NARAYAN RAMAKRISHNA
16-MAY

NAIK PRITAM
16-MAY

SUNDARAM T. G.
16-MAY

MALEKAR LORENCE JOSEPH
17-MAY

JOSHI MAHADEV RAMCHANDRA
18-MAY

CLIFFORD VIEGAS
18-MAY

HEGDE SHREEPATI GANAPATI
18-MAY

SHARMILA PRABHU
19-MAY

BALE TEJA DEVENDRA
20-MAY

VENKATESH KESHAV SHET
20-MAY

GAUTAM ALIAS BHUEPESH NARAYAN NARVEKAR
21-MAY

SUDHA PAI T.
21-MAY

RAJESH RAJANIKANT NAVELKAR
22-MAY

VARSHA PRAMOD DESHPANDE
23-MAY

RAMKRISHNA ALIAS ROHIT DEEPAK MARATHE
24-MAY

FRANK DARRYL CLAUDIUS
24-MAY

ASHISH VASSUDEV PRABHU VERLEKAR
24-MAY

SHRINIVAS PANDURANG NAYAK
24-MAY

BRIJESH RAMESH PEDNEKAR
24-MAY

AMLANI KAMLESH DEVJI
25-MAY

DHUME SATISH RAMCHANDRA
27-MAY

KALPAK DARSHAN RAO VALAULIKER
28-MAY

PARIMAL GOVIND KULKARNI
29-MAY

JOSEPH V. A.
31-MAY

PRASHANT SHASHIKANT KAMAT
31-MAY

SUBHRAHMANYA BHAT K. M.
31-MAY

*"You define beauty yourself, society doesn't define your beauty."*

# June Birthdays

| | |
|---|---|
| Mohan Bimarao Pyati | 01-June |
| Desouza Edwina Ann | 02-June |
| Shilpa Rahul Deshpande | 02-June |
| Atul Subhashi Joshi | 02-June |
| Tukaram Sripada Borkar | 03-June |
| Shetty Chetana Sridhara | 05-June |
| Manisha Gautam Fatarpekar | 06-June |
| Devraj Divaspati Vishwamitra | 07-June |
| Jose Joao Fernandes | 08-June |
| Vivek Pandurang Sinai Mopkar | 08-June |
| Verlekar Janardan Mahablu | 11-June |
| Luis Salvador Lawrence Vaz | 12-June |
| Kamath U. Nagesh | 13-June |
| Yeshwant Vishnu Kamat | 15-June |
| Atindra Anand Prabhu Bhatikar | 16-June |
| Ashish Moreshwar Marathe | 17-June |
| Vijaykumar Ganpat Sinai Amonakar | 18-June |
| Elson Marcos Sequira | 18-June |
| Jeronimo Caetano Neil Braganca | 18-June |
| Silverio Florencio Dias | 20-June |
| Patil Manickrao S | 21-June |
| Shah Lalit Kumar Bhogilal | 21-June |
| Vinita Maria Elvira Monteiro | 21-June |
| Kirti Rohit Marathe | 22-June |
| Sangeeta Mehta | 24-June |
| Dalvi Shamsunder Shridhar | 27-June |
| Rohit Ashok Kukalekar | 30-June |

*It is our sincere attempt to be part of & wish you on your special day. We are in the process of updating our data. If we miss anyone or any wrong data is noticed, please call Ranjita @ 0832 2438516 so that we can update our records.*

*"If you prioritize yourself, you are going to save yourself."*

# Editorial Board

**CA. Rohan Bhandare**

**CA. Aishwarya G. Talaulikar**

**CA. David Pinto**

**CA. Sravani Devidas Gurav**

**CA. Sneha Menon**

**CA. Atul Joshi**

**CA. Prajakta Parab**

**CA. Venkatesh Shenai**

***Want to contribute to newsletter?***

*Please send your article whether technical or otherwise to*
***jagruti@goa-icai.org***
*with your photo & brief profile.*