

AAGAZ

CA FINAL *Batch*

2025 & ONWARDS

Indirect Tax Laws

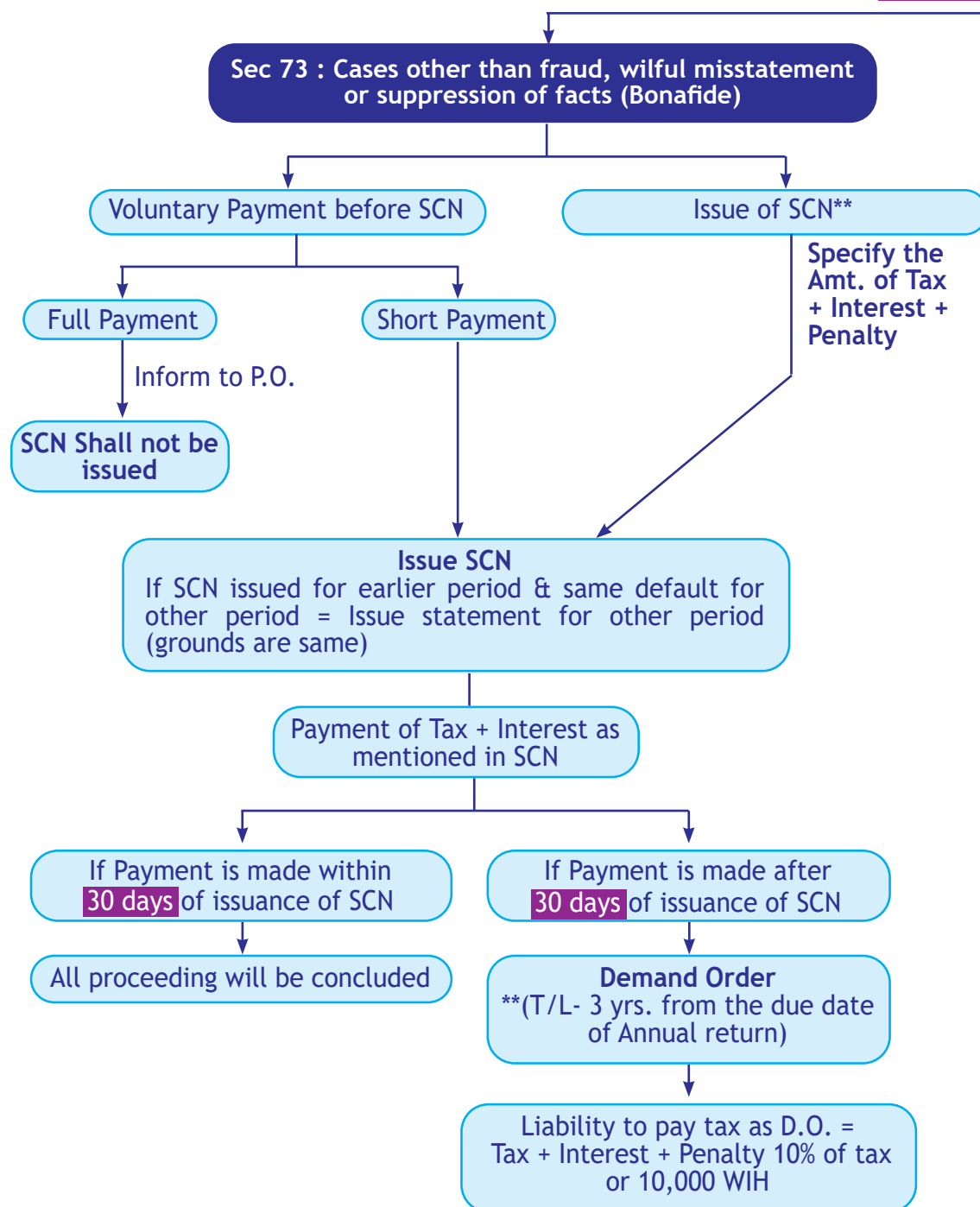
Lecture – 01

**Demand & Recovery
Offences & Penalties**

By –CA Karan Sheth



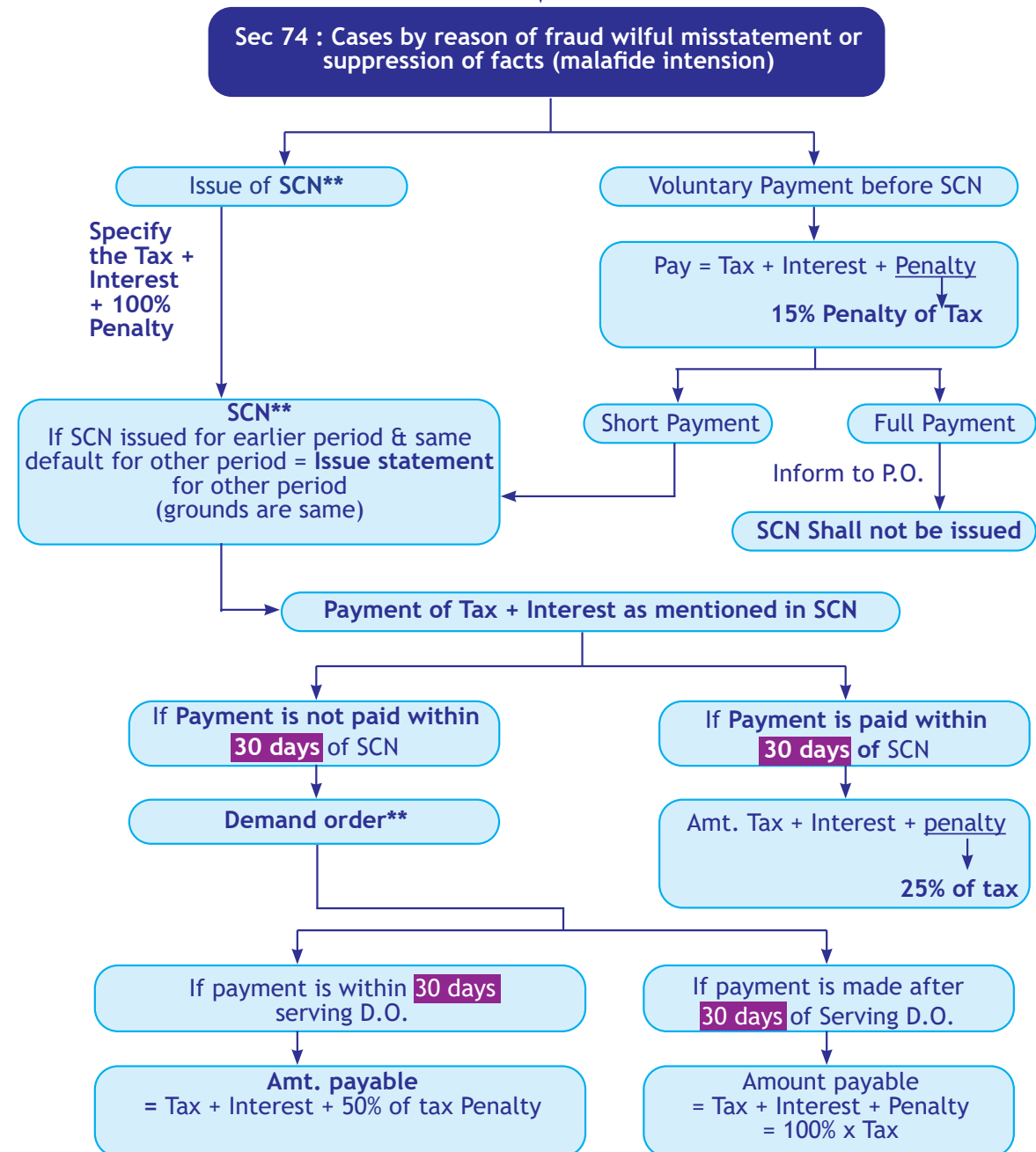
→ Tax Not Paid
→ Tax Short Paid
→ ITC wrongly availed & utilized
→ Erroneous Refund



Timelimit
****All cases** : 2 yrs. & 9 months
****Erroneous Refund** : 2Yrs & 9months

SCN
 3years from D/D of A.R
 3years from date of erroneous refund

Demand order
 3years from D/D of A.R
 3years from date of erroneous refund

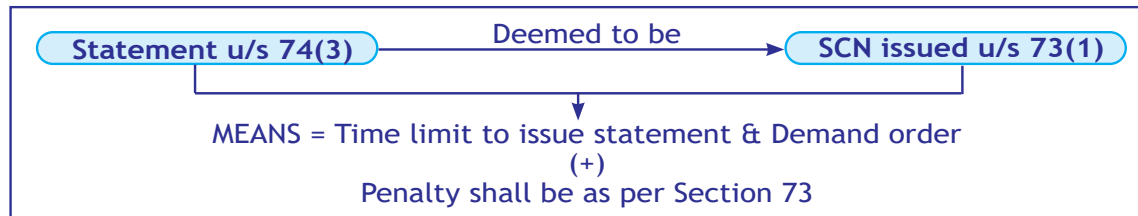
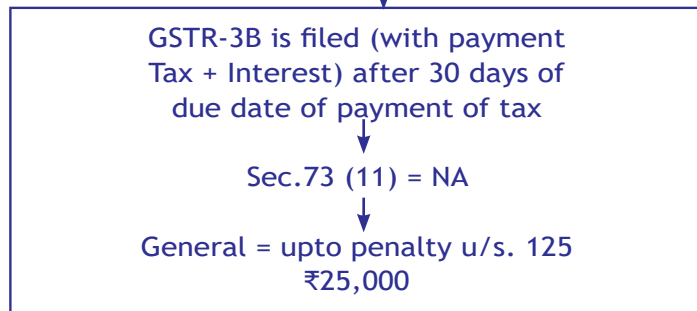


SCN
 Timelimit : **All cases-4 yrs. & 6 months or 5 yrs from D/D of A.R

Demand order
 **Erroneous Refund-4Yrs & 6months or 5yrs from date of erroneous refund

Important points to remember

73 (11) : Self Assessed Tax (GSTR-1) but not paid within 30 days of due date.

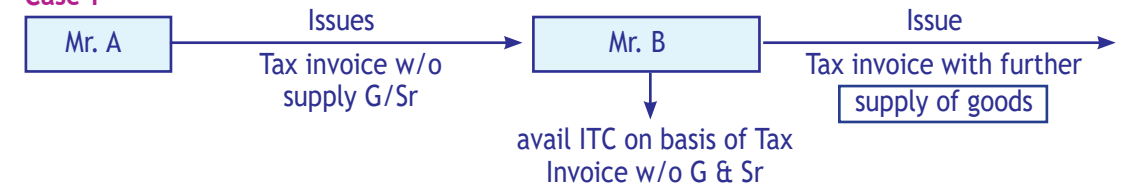


Important Notes -

- I. all proceedings in respect of the said notice" shall not include proceedings under section 132
- II. Proceedings against the main person have been concluded under section 73 or section 74, the proceedings against all the persons liable to pay penalty under sections 122, 125 are deemed to be concluded but sec129/130 shall continue

Clarifications

Case-I



Clarifications

Mr. A

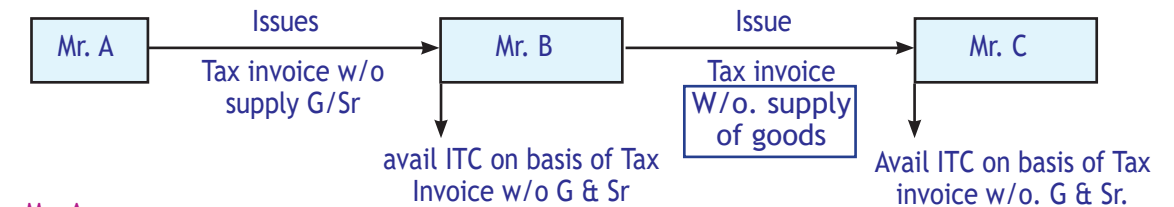
- (i) Is it supply u/s. 7 = No.
- (ii) D & R can be made from Mr. A = No u/s. 73/74.
- (iii) Any penalty imposed to Mr. A = Yes u/s. 122 (i) for issuing tax invoice w/o. supply G/Sr.

Mr. B

- (i) Is Mr. B liable for : Mr. B has availed ITC fraudulently by contravening Sec.16(2) (b) demand u/s. 73/74

- Hence liable for
- (i) D & R U/s. 74
 - (ii) Penalty u/s. 74
 - (iii) ∴ penalty is levied u/s. 74
- No other penalty shall apply for the same (Incl. Sec.122(1)).

Case-II



Mr. A

- (i) Is it supply u/s. 7 = No.
- (ii) D & R can be made from Mr. A = No u/s. 73/74.
- (iii) Any penalty imposed to Mr. A = Yes u/s. 122 (i) for issuing tax invoice w/o. supply G/Sr.

Mr. B

- Penalty u/s., 122 (1) (ii) → Issue invoice w/o. supply
122 (1) (vii) → Avail ITC w/o. actual receipt G/Sr.

Mr. C

- No comments by ICAI.
→ Penalty → 122 (1) (vii) → KS opinion

Mr. A to Mr. B and Mr. B to Mr. C
Since no goods are supplied
↓
7(1)(a) shall not apply
↓
∴ No liability arises
↓
∴ Demand of tax u/s. 73/74 = NA

SUMMARY OF SECTION 75

- Time limit to issue SCN and Demand Order (+) Extend by Period of Stay Order.
- Interest mandatory to be paid even if not mentioned in Demand Order.
- If the case is remanded from Appellate Authority / Appellate Tribunal / Court

to
[Adjudicating Authority]

He shall pass order within 2 Years from Date of Communication of Order

- Opportunity of being heard before passing order.
- Amount in **Demand order** CANNOT EXCEED amount in **SCN** & Demand order shall confirm only those grounds that are covered in the notice.
- If Appellate Authority or Appellate Tribunal or Court modifies the TAX LIABILITY then

Interest and Penalty shall automatically be modified.

- Demand Order = Speaking Order
- If Appellate Authority/Appellate Tribunal / Court concludes SCN u/s 74(1) is Invalid.
Then,

SCN u/s 74(1) Deemed to be SCN u/s 73(1)

Note: Such order of re-determination of T,I,P Shall be issued by P.O within 2yrs from date if communication of said direction by AA/AT/Court.

- Adjudgments = Maximum 3
- If Demand Order is issued after time limit i.e. 3 years/5years = Date shall be barred.
- If Penalty is imposed u/s 73/74 → NO Penalty on same person shall be imposed under this Act.
- Department shall directly start Recovery Proceedings u/s 79 in case where registered person has not paid Self Assessed Tax.

- This happens when Outward is reflected in GSTR-1 supply & not paid in GSTR-3B
- But if the difference is due to
 - i) Typographical error
 - ii) Where a supply could not be declared in GSTR-1 of earlier tax period but was paid correctly in GSTR-3B

P.O shall send communication to RP for explaining the difference

Recovery proceedings u/s 79 shall be initiated only when

- Fails to reply
- Fails to make payment
- Fail to explain reasons

SECTION 76

- Tax collected but not paid (Irrespective that supplies Taxable
Exempt)

- P.O shall issue SCN = No Time limit

Demand order = within 1yr from date issue of SCN

- Interest @ 18/. p.a shall be paid

Date when tax was collected upto Date when such amt is paid.

→ Amount paid to Govt

Shall be adjusted against tax payable by person i.r.t taxable supplies

Surplus amt after adjustment shall be credited to

1. Refund to person who has borne burden of tax
2. CWF

SECTION 77, GST Act

Wrongfully paid C + S

∴ Refund C+S
(+)
Pay IGST

SECTION 19, GST Act

Wrongfully paid IGST

∴ Refund IGST
(+)
Pay C+S

Interest on delayed payment of C+S or I = Nil

SECTION 78

Pay Tax + Int + Penalty within

3 months from the date of service of demand order

If P.O consider then such period can also be reduced.

Section 79: Recovery

Through Magistrate
P.O. may file application to magistrate

Deduction from amount payable

Amount payable to such person = xxx
Less: Amount owing to Govt. = (xx)
Net payable to such person = xxx

Recovery through Goods

By Selling/Detaining any goods belonging to such person which are under control of P.O.

Distrain of Movable/Immovable property

Distrain the property under the control of P.O.

If payment of
1) said amount
2) Cost of distress

(Remain unpaid for 30 days)
Such property may be sold

Garnishee Proceedings

Through Collector

P.O. may prepare certificate specifying amount & send it to Collector in which P-I-D resides/carries/ business & Collect as if such dues were land arrears

Recovery from persons from whom money is due to such persons
Or Holds money of such person

Person to whom notice is served is bound to comply it

Any notice issued to P.O, Bank, Insurer
Not be necessary to produce
Deposit Receipt/Pass Book/Policy to recover money

P.O. can revoke/ amend/extend the time for payment of such notice

Any person making payment in compliance with notice issued

Deemed to

Have made payment under authority of P-I-D

Any payment credited to Govt.

Shall be Deemed to

Amount paid by such P-I-D to the amount specified in the receipt

Even after notice is served if the person makes payment to P-I-D, then he shall be personally liable to the extent

Liability is discharged

Or
W.I. Less

Extent of Liability of P-I-D

Money demanded was not due to such P-I-D

If such person proves that

OR

He did not hold any money for P-I-D*

P.O. shall revoke such notice

*P-I-D = Person in Default

Recovery of tax u/s. 79 is done only after.

- SCN is issued.
- Demand order is confirmed and The same does not arise during the course of search, inspection, investigation on account of any issue detected during such proceedings.

SECTION 80

Tax can paid in Instalments
Self Assessed Tax = NA
Demand liabilities = ✓

Application - Commissioner

No of Installments = As Commissioner may deem fit
Max = 24 EMIs

Default in anyone Instalment =

Outstanding Bal shall become due & payable immediately

Sec 82:- Tax to be first charge on property

- Any amount payable by a taxable person
- Govt shall have first charge on property (Subject to IBC).

Sec 83:- Provisional attachment of property

Pending of proceedings under,
Chapter XII - Assessment
Chapter XIV - Inspection Search Seizure
Chapter XV - Demand & Recovery

- Commission shall pass an order DRC - Mentioning details of the property which are attached
- Copy of order shall be sent to

Concerned Revenue Authority

Transport Authority

Bank

&

- Also Person whose Property is attached.
- Person can file objection in DRC-22A, if property is not liable to be attached. within 7 days (No time limit to file it)

- If objection is filed commissioner should provide OOBH.
- If commissioner is satisfied

Yes

Release Property

No

Attachment Continues

Note 1:

Provisional Attachment on movable / immovable property shall be removed only on written instructions from Commissioner to that effect or

An expiry of period of or from date of issuance of order of provisional attachment of property

Note 2 : Property of a person specified v/s 122(1A) can also be attached a part from taxable person.

Sec 81:- Transfer of Property to be void

- Person after amt become due from him
- Creates charge or parts with the property With the intention of defrauding the Govt).
- Such trf = void

Exception

- If such trf is made
- For Adequate Consideration or
 - In good faith or
 - Previous permission of P.O.

Sec 84:- Continuation & validation of Recovery proceedings

- D/o served Taxable Person
- Appeal / Revision application is filed
- Officer to stay Recovery Proceedings
- Appeal disposed off resulting info.
 - Cancellation of D/o = No Recovery
 - Confirming D/o = Recovery Continues
 - Enhancing of Dues = Comm shall serve notice of demand for enhanced amount.
 - Recovery for both old & New Notice of demand shall continue now.
 - Reduction of dues
 - Fresh demand notice not necessary
 - Recovery proceedings shall continue.

W.I.E

Section 122(1)

- | | |
|---|---|
| <ul style="list-style-type: none"> (i) Supply without issuing invoice or false/incorrect invoice (ii) Issued invoice without supply (iii) ITC availed without receipt of Goods/ Services (iv) Tax collected but not paid within 3 months (v) Tax collected in contravention but not paid within 3 months (vi) fails to deduct tax u/s 51 (TDS) (vii) fails to deduct tax u/s 52 (TCS) (viii) fraudulently obtains refund (ix) takes or distributes ITC in contravention of Section 20 i.e. being an ISD , improperly ITC taken or distributed (x) fails to obtain registration even though liable to register (xi) furnishes false information w.r.t. registration or subsequently (xii) Issued invoice or document by using the registered number of another registered person | <ul style="list-style-type: none"> (xiii) Suppresses turnover (xiv) falsifies or substitutes financial records or produces fake accounts or documents (xv) transports taxable goods without documents (invoice/ delivery challans and e-way bills) (xvi) obstructs or prevents an officer in discharge of his duties (xvii) tampers or destroys material evidence or documents (xviii) fails to keep, maintain or retain books of accounts (xix) fails to furnish information or document or furnishes false information (xx) supplies, transport or stores any goods liable to confiscation (xxi) disposes off or tampers any goods that have been detained or seized or attached |
|---|---|

Penalty u/s 122(1) = ₹ 10,000/- or Tax, W.I.H.

Section 122(1A)

Taxable person or any other person who retains the benefit arising out of the following offences only

- i) supply of goods/service without invoice
- ii) invoice with supply of goods/service
- iii) ITC taken (utilized without receipt of goods/service.
- iv) irregular distribution of ISD credit.

Penalty = 100% x tax evaded or ITC availed

Section 122(1B)

If ECO permits unregistered person to make inter-state supply through it or fails to furnish correct details in Form GSTR-8 with respect to any outward supply of goods through it by an unregistered person who is exempted from registration

Penalty = ₹10,000

or

100% x Tax involved

(if the supply had been made by registered person under normal scheme)

W.I.H.

Sec 122(2)

Tax Not Paid
Tax Short Paid
ITC wrongly availed
Erroneous Refund

Without Fraud Wilful Misstatement
Suppression of facts

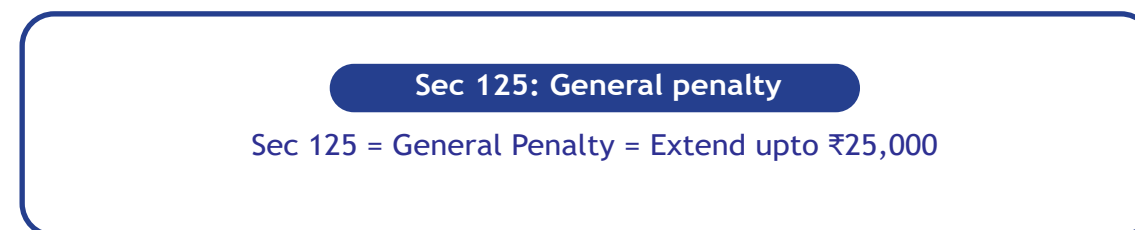
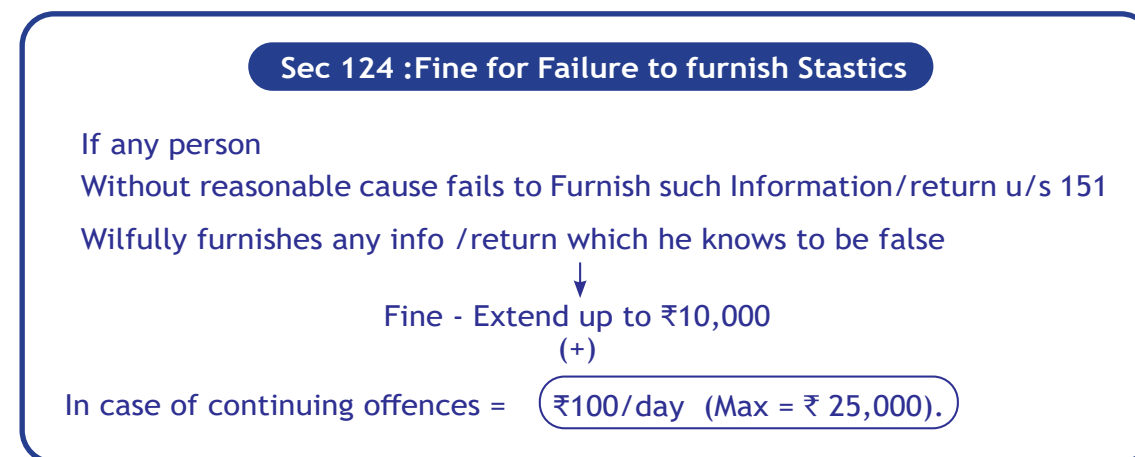
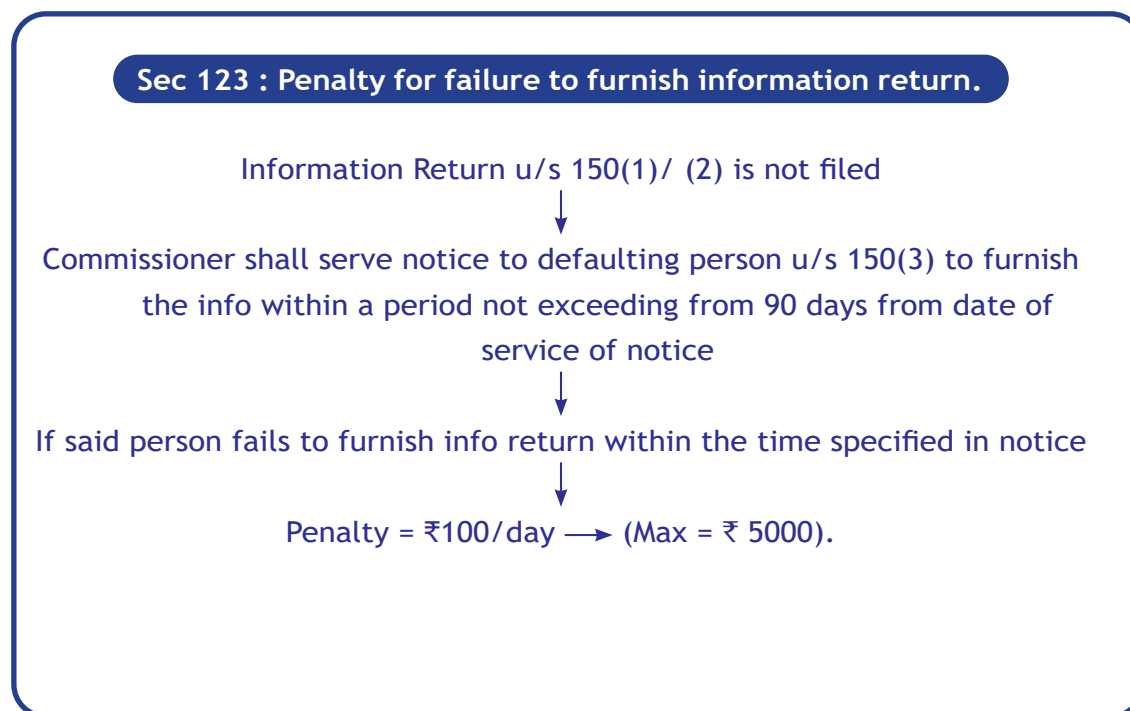
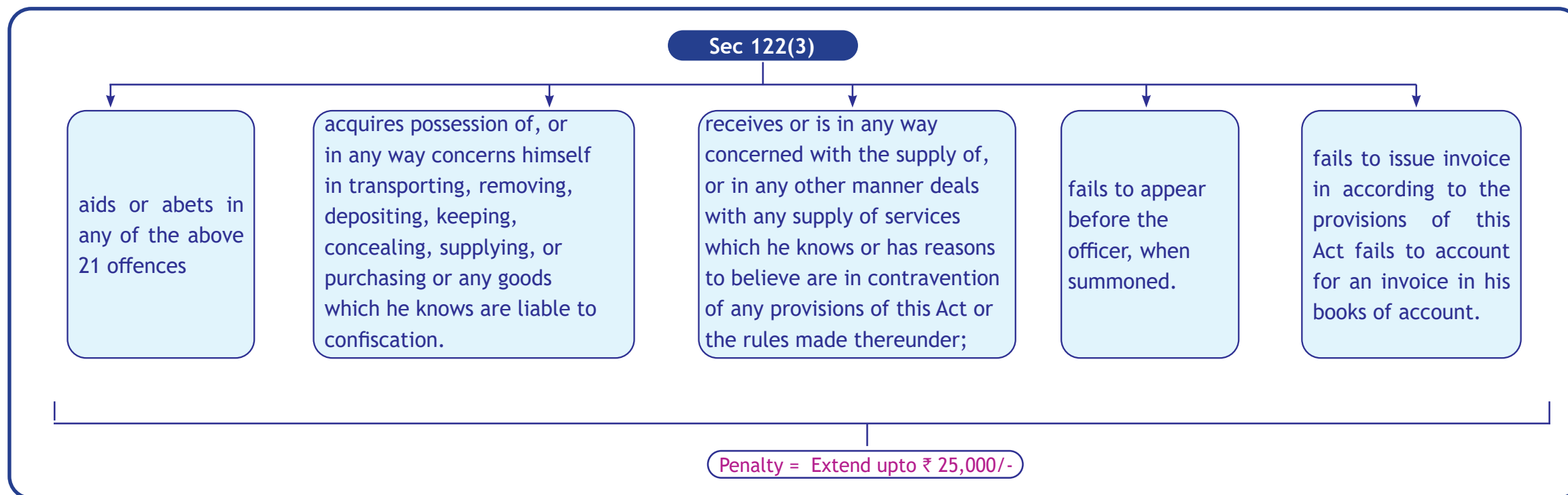
10,000
or
10% x Tax

W.I.H.

With Fraud Wilful Misstatement
Suppression of facts

10,000
or
100% x Tax

W.I.H.



Sec 126: General discipline related to penalty

- No officer shall impose penalty**

Minor Breaches of Tax Regulations or Procedural requirements → Minor Breach :- Tax Amount involved < ₹ 5000

Any omission or mistake in documentation which is easily rectifiable and made without any fraudulent intent or gross negligence
- Penalty imposed shall depend on**

Facts and circumstances of Each Case → Commensurate to → Degree and Severity of Breach
- No Penalty WITHOUT giving opportunity of being heard**
- Penalty order shall specify**

Nature of Breach → Applicable Law

Where amount of Penalty for breach is specified

When there is voluntary disclosure of breach of law before P.O. discovers such breach

P.O. consider mitigating factor while quantifying penalty
- Section 126**

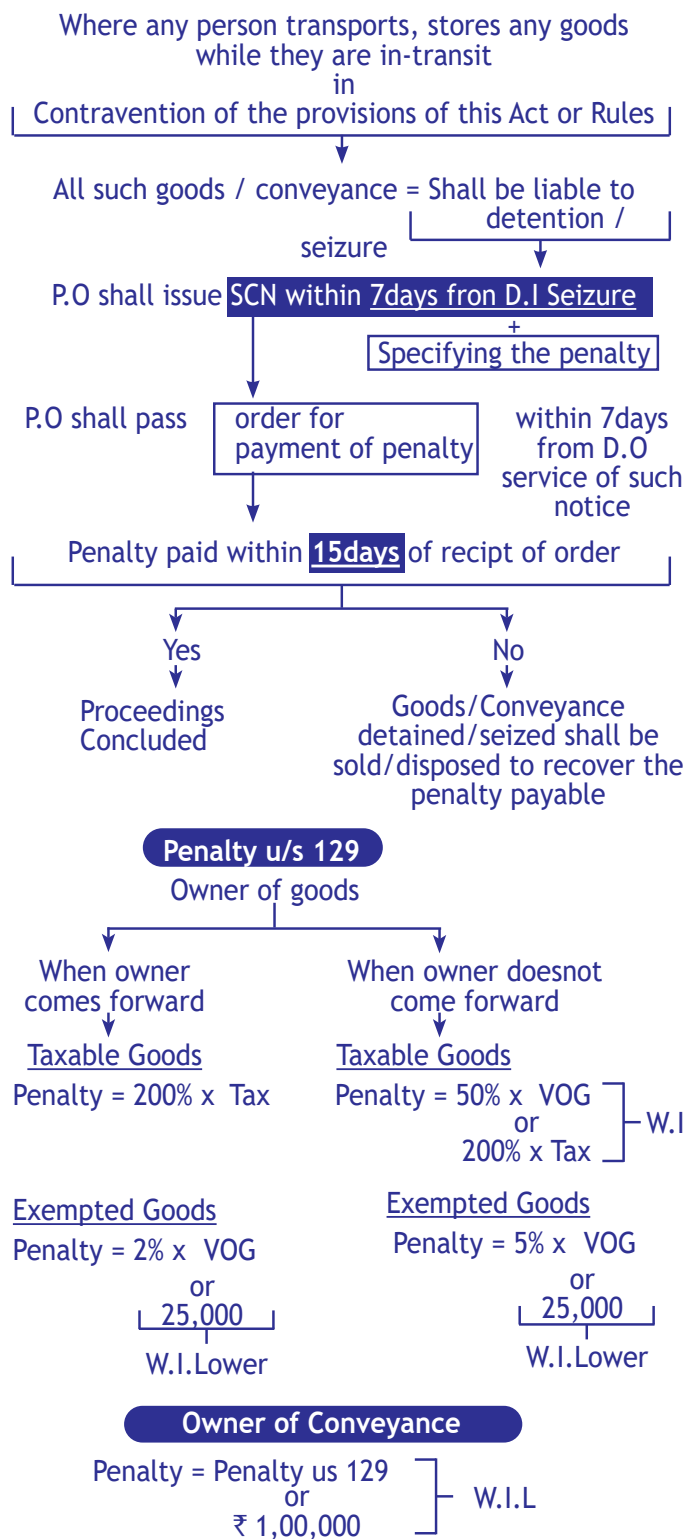
Shall **Not Apply** where Penalty is Fixed Sum or Fixed %

Eg:- Section 122(1) Section 122(2)

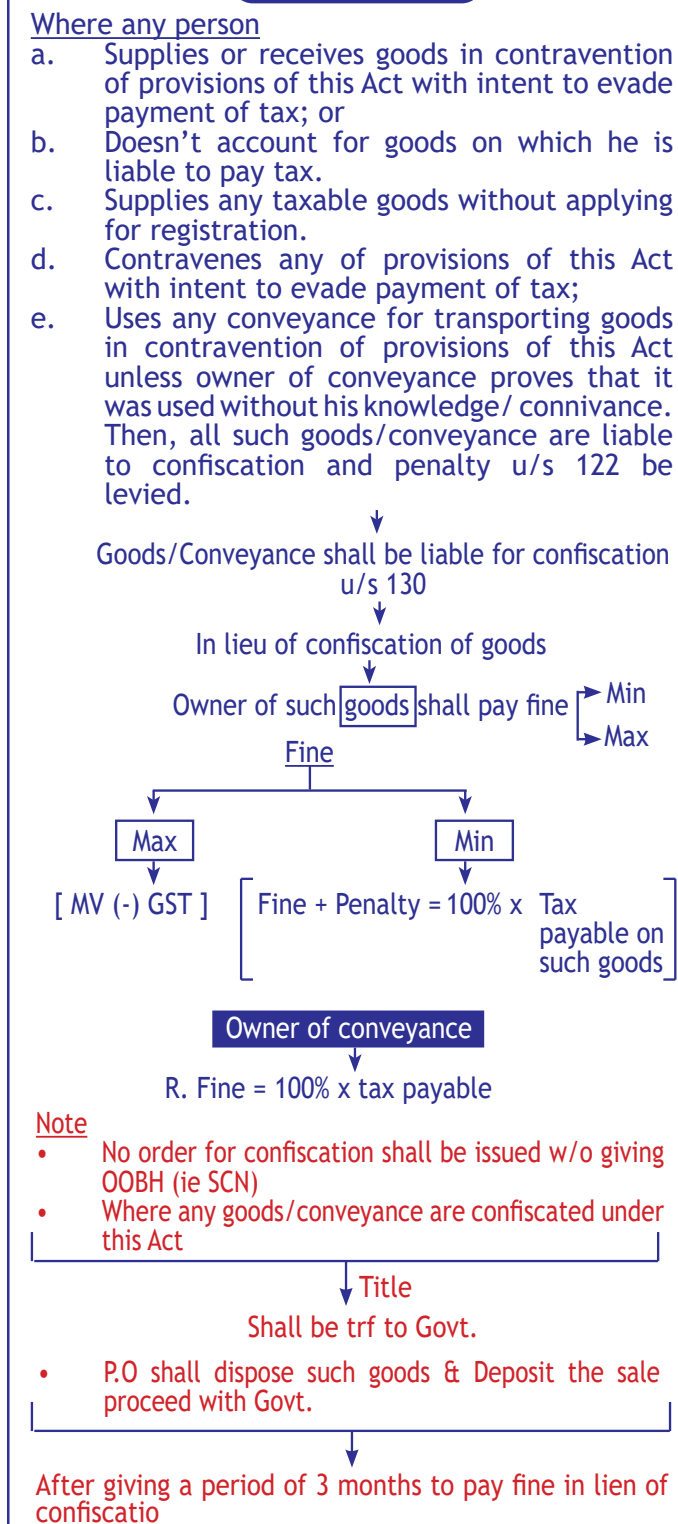
Shall **Apply** where Penalty is not Fixed

Eg:- Section 122(3) Section 125

SECTION 129:



SECTION 130:



SECTION 132:

(a) Supply of G/Sr w/o Invoice	(h) Acquires possession / Transports / Removes supplies / purchases Goods liable for Confiscation
(b) Issue invoice w/o Supply G/S	(i) receives supply that he knows / reasons to believe that are in contravention of provision of this act.
(c) Avails ITC on basis of invoice w/o G/Sr. or fraudulently avails ITC u/s w/o any invoice.	(l) Commits / Abets any offence u/s 132(1)(a) to (f), (h), (i)
(d) Collects tax but fails to pay beyond a period of 3 months.	
(e) Evades Tax/fraudulently obtains refund & where such offence is not covered under clause (a) to (d).	
(f) Falsifies financial records Fake A/cs. Falso info	} to evade tax

Offence & Prosecution

1 Arrest - Sec 69

Offence u/s 132(1), (a), (b), (c), (d) where
Tax evasion > 2 crores

2 Cognizable & Non - Cognizable Offence = 132 (5)

Offence u/s 132(1), (a), (b), (c), (d) Where
Tax evasion > 5 crores → **Cognizable & Non bailable**
Any other case - Non cognizable & bailable

3 Offences committed u/s 132(1)(a)/(b)/(c)/(d)/(e)/(h)/(i)/(l)

Tax Evasion

More than 5 cr
More than 2 cr upto 5 cr

Imprisonment

upto 5 years + Fine }
upto 3 years + Fine } Min Imprisonment = 6 m

Offence committed u/s 132(1)(b)

Issuance of Invoice without supply leading to wrongful availment / Utilization of ITC / Refund of tax

Tax Evasion
More than 1Cr upto 2cr

Imprisonment
upto 1Yr (+) Fine } Min*
6m

Offence committed u/s 132(1)(f)

Falsify a/cs, records, information with an intention to evade tax

Tax Evasion
No limit

Imprisonment
Upto 6m or Fine or both

For second & every subsequent offence

Tax Evasion
No limit

Imprisonment
upto 5yrs & Fine } Min*
6m

Section 133

OFFENCES COMMITTED BY GST OFFICERS AND CERTAIN OTHER PERSONS (SEC 133)

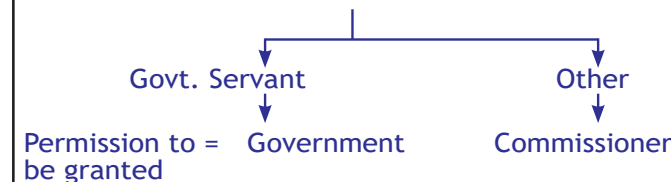
OMISSION/DEFAULT: - Wilfully discloses any info or contents of return otherwise than:-

1. in execution of his duties
2. for the purpose of prosecution for an offence

DEFAULT BY:

1. Any person engaged in collection of Statistic u/s 151 or compilation or computerization or
2. Any officer or Central tax having access to info. u/s 150(1) or
3. Any person engaged in connection with the provision of service on common portal or agent of common portal

PUNISHMENT: - Imprisonment upto 6 months or fine upto 25,000 or both



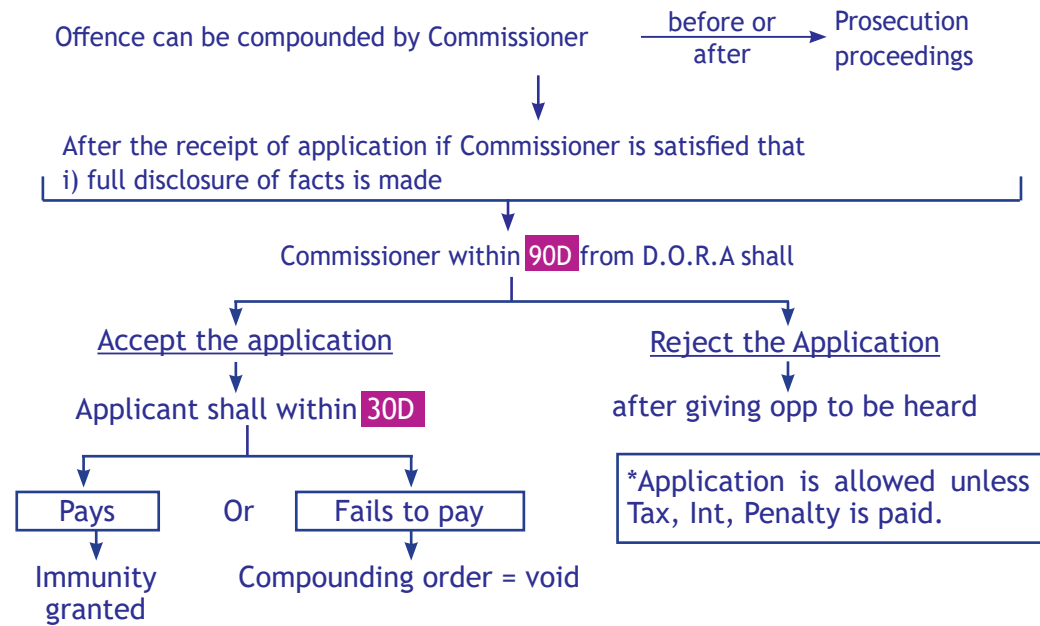
Section 137

OFFENCE COMMITTED BY	PERSON GUILTY	Nothing contained in this section shall render any person liable to punishment if he proves that the offence was committed without his knowledge or that he exercised all due diligence to prevent the commission of such offence.
1. company	Director, Manager, Secretary or other person if it is proved that offence has been committed :- a) with his consent/ connivance b) he is attributable to any negligence	
2. partnership firm or llp or trust	Partner OR Karta Or Managing Trustee	

* Min 6m in absence of special & adequate reasons to the contrary to be recorded in judgement of Court.

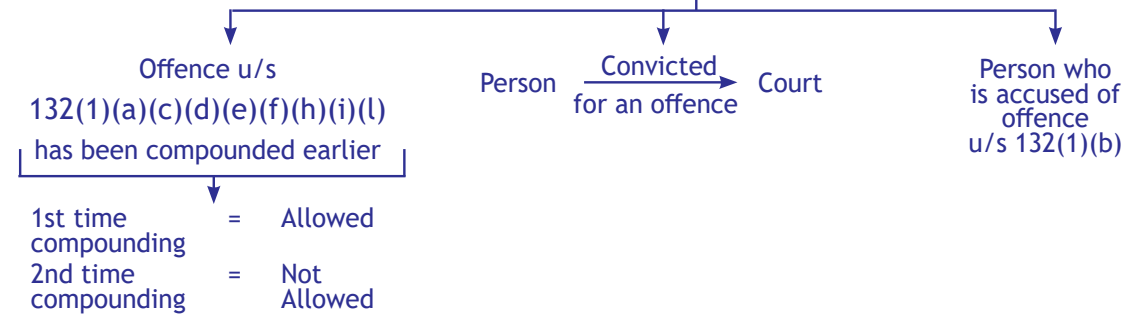
DORA = Date of receipt of application

Sec138 : Compounding of offences



Sec 138 : Any offence under this act can be compounded by Commissioner (before or after institution of prosecution)

Exceptions



Compounding amount

Offences	Compounding amt if Amt > 5Cr. Involved u/s 132(1)(i)	Compounding amt if Amt > 2Cr. upto 5Cr. Involved u/s 132(1)(ii)
Offences u/s 132(1)(a)(c)(d)(e)	Max → 75% x tax evaded or Min → 50% x tax evaded	60% x tax evaded or 40% x tax evaded
Offences u/s 132(1)(f)(h)(i)	→ 25% x tax evaded	25% x tax evaded
Offences u/s 132(1)(l) ie. Aids/Abets any offence above	→ 25% x tax evaded	25% x tax evaded

Tax Not Paid
Tax Short Paid
ITC wrongly availed/utilized
Erroneous Refund



SCN = ✓



D/O = (within 3m) ✓



Pay ✓
close

or

Appeal ✓
D/O = stay



Do Not Act

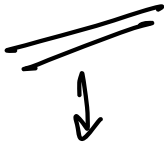


Govt start Recovery proceedings....
↓
Sec 79

41

Sec 73

(B) ✓



T/L

-

SCN ✓

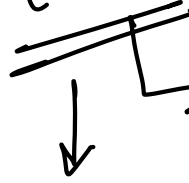
DO ✓

Sec 74 ✓

F

(M)

MR



COF

Penalty → Payment Schedule

73

74

SCN → 2 yrs + 9m
- same

✓ 4 yrs + 6m
- same

D/O → 31/12/25 ✓✓

✓✓ 31/12/25 - Same

TN/TSP/ITC = D/D of tax period
where such
TN/TSP/ITC relates to

E/R = Date of E/R granted

Eg:- Mr. A $\xrightarrow{\text{SCN}}$ Tax Not paid / (TSP/ITC w/A April '25) = 10L

T/L = 30/9/29

D/O →

T/L =

Tax Period = April '25 ⇒ D/D of A/R = 31/12/26
↓ 31/12/25

TN/TSP/ITC = { D/O = 31/12/26
SCN = 30/9/29 }

Mr. A $\xrightarrow{\text{SCN}}$ Err. Refund = 10L

Date of grant of E/R = 15/4/25
↓ 3428

E/R =

D/O = 15/4/28

SCN = 15/1/28

Mr. A $\xrightarrow[\text{Sec 74}]{\text{SCN}}$ TNP = 10L
(April 25)

Tax Period = April 25

SCN

= 30/6/31

Sec 74

D/O

= 31/12/26 + 5/28

$$= 31/12/31$$

$$ER = 15/4/25 \rightarrow \text{sc 74}$$

$$SCN = 15/10/29$$

$$D/O = 15/4/30$$

Payment Schedule



73

Voluntary (before SCN) = T + I

P = No Penalty

within 30D from SCN = T + I

P = No Penalty

↓
After 30D from SCN - Payment Anytime →
↓
within 30D from D/O = T + I
Penalty shall always apply

with { $P = 10\% \times \text{Tax}$
or
10,000

after 30D from P/O = -same-

10% X Tax }
or } 0.1H
10,000 }

74

Voluntary = T + I + P

$$15\% \times \text{Tax}$$

$$\text{within 30D} = T + I + \frac{P}{I}$$

from SCN

$$25\% \times \text{Tax}$$

$$\text{within 30D} = T + I + \frac{P}{I}$$

from D/O

$$50\% \times \text{Tax}$$

$$\text{after 30D from D/O} = T + I + \frac{P}{100\% \times \underline{\underline{\text{Tax}}}}$$

73(11)

Tax period = April '25 = ✓

Due date of tax = 20/5 / 25 = ✓

Actual Payment of tax = 30/6 / 25 (Delayed payment of tax)

73(11)
Delay POT

late
paymen

Int

Non payment
of tax paymen
hi
nahi

↓

Penalty

Self Assessed Tax is

paid after 30D from D/D

P = 73(11) = NA

↓
73(11) = Non compliance
↓

S/A tax not paid within
↓ 30D

Gen Penalty = upto 25,000

Issuance of SCN =

Issuance of statement = ?

Eg^o April'24 to Sept'24 ✓



SCN is issued = Tax Not Paid
on 1/4/25



April'23 to March'24



Issue = Tax Not Paid (grounds)

SCN = X

Statement = ✓ (Amt demanded)

Offences & Penalties

S w/o I

I w/o S

R \rightarrow ITC on I w/o G/S

Tax C \rightarrow Pay 3m

Tax C \xrightarrow{C} Pay 3m

TDS - fails to D/P/D-1 etc

TC \rightarrow fails C/P/C-1 etc

F/Refund

ISD \rightarrow Excess
Distribute

⑧ - R \rightarrow fails

\rightarrow Reg/Info = false

\rightarrow Supply \rightarrow Someone
LS7IN

Tip \rightarrow Suppress T/O

→ Fake A/Cs, Docs

→ Tr Goods w/o Docs

→ Obstruct P.O.

→ Evid / Docs - Tamper / Destroy

Fails
→ BOA/C

→ Fails Info.

→ Seize → Dispose of

~~Value~~ \rightarrow Transport/Supply
 \rightarrow Confiscation



$P = 10,000$ or $100\% \times \text{tax}$

with Higher

21 offences

Sw/o I

Suppress

I w/o S

Fake Docs/ALs

R. 17C on I w/o U/S

T/G w/o Docs

Collect

Obstruct

Collect \rightarrow Cont^{ro}

T/D - evidence

TDS

Fals - BOA / e

TCs

Fair \rightarrow Info
False \rightarrow ~~Info~~

F/R

T/S / \nwarrow Guilt
©

ISD - Excess / TC

Dispoⁿ \rightarrow Seize / D

Reg

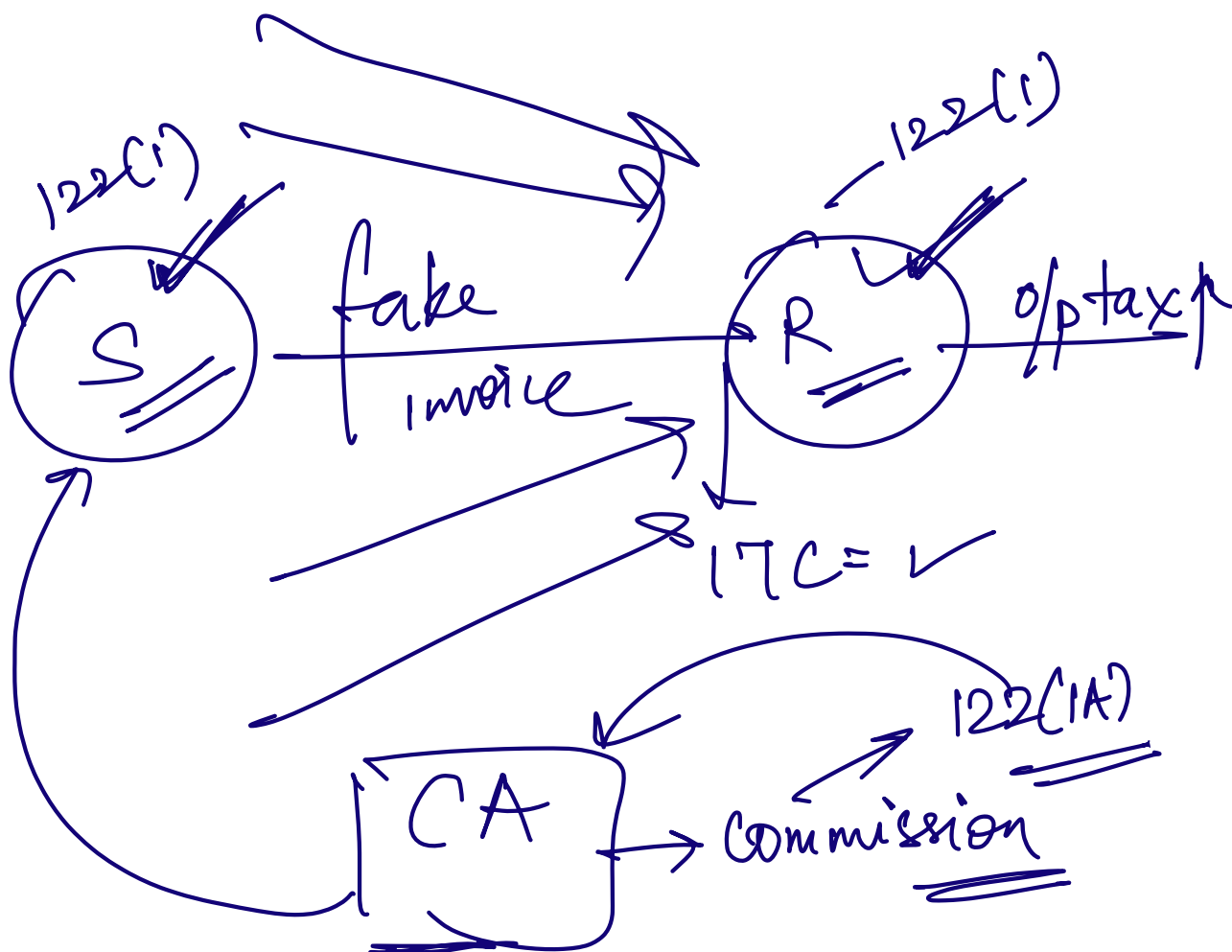
1. 5. 1. 6

link
fails

RC ✓
False
Info

Supply
Someone
4S11N

122(1A)



✓ Lena Bank has defaulted in filing Info Return on its due date.

Commissioner served notice to Lena Bank to furnish Info Return on 1/4/26 ^{30D} 1/5/26
period allowed to file Info Return in the Notice - within 30 Days

Lena Bank furnished Info Return → 1/7/26.

Compute Penalty leviable to Lena Bank?

$$\text{May } (31-1) = 30$$

$$J = 30$$

$$J = 1$$

$$\underline{61 \text{ Days}}$$

$$\text{Penalty} = 100/\text{day} \times 61 = 6100$$

or
~~10000~~
 W.I.L

Sec 124

Mr. Sharma, a business owner is reqd to furnish statistical data about his business ops to tax department

→ Due Date = 10/1/26

→ Actual Date of furnishing data = 15/2/26

$$\begin{array}{r} J-21 \\ F-15 \\ \hline 36 \end{array}$$

Compute Fine?

upto 10,000 +

10,000 +

= 13,600

continuing offence
100 × 36 (max-25%)

3600

125 = Gen penalty

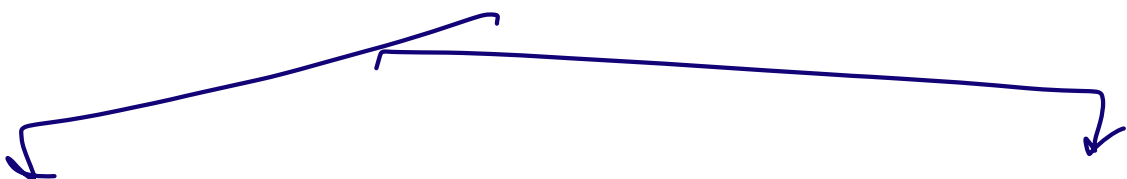
Section - Non Compliance
↓

~~P~~ =
↓

Sec 125 = ✓

vpto 25,000 ₹.

Sec 129



Does come forward

$$= 200\% \times \text{tax}$$

$$= \textcircled{122400}$$

Does not come forward
↓

$$= 200\% \times \text{tax}$$

$$= 200\% \times [6.80L \times \textcolor{yellow}{9\%}]$$

$$= \textcircled{122400}$$

or

W.I.H

$$= 50\% \times 6.80L (\text{vat})$$

$$\neq \boxed{3.40L}$$

Ash. Trps

$$= 129 \text{ or } 1L, \text{ W.I.L}$$

$$= 3.4L \text{ or } \underline{\underline{1L}}$$

= 1,00,000

132(1)

(a) S w/o I

(b) I w/o S

(c) R-ITC \rightarrow I w/o G/G
G/G w/o I

NA 24/1/201

(d) Collect tax

(e) Ex tax - other a, b, c, d
F/R

(f) - F

(h) - Tr / AP / S → Liably
CF

(i) - Rec

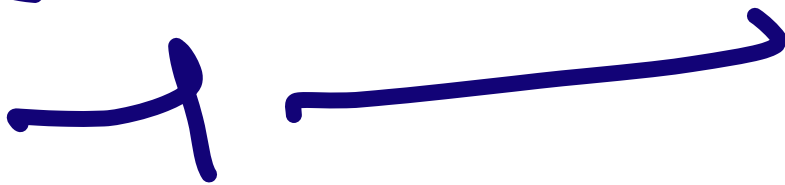
(L) - Aids

Arrest

$$132 - (1)(a)(b)(c)(d)$$

$$\text{Tax Evasion} > 2\text{Cr}$$

$$\frac{C + NB}{\text{---}}$$



$$T/E > 5\text{Cr}$$

Jail

All Offences except (f)

+

72cr vptasth 214ft

75cr

514FF

mm-6m

132(1)(b)

I w/o 6/58 → 71cr-2cr
L

14cr + F

+

mm-6m

$$\frac{132(1)(f)}{\underline{\underline{\quad}}}$$

$$T/E = -$$

$$\text{upto } 6m \propto F \propto B$$

Any θ - Subsp.

upto 5 yrs + F

min - 6m

<u>offence</u>	<u>Tax</u>	<u>Arrest</u>	<u>NC+B</u> <u>C+NB</u>	<u>Tail</u>	<u>Compounding</u>
Supplies Goods W/o Invoice	→ 1Cr	No	NC+B	NA	⊗ 132(1)(a)
132(1)(a)	→ 2Cr	No	NC+B	NA	⊗ C = once = ✓ Again = x
	→ 3Cr =	Yes	NC+B	upto 3 yrs + F	⊙ 60% 1.8Cr 40% 1.2Cr
	→ 10Cr =	Yes	C+NB	upto 5 yrs + F	⊙ 75% 7.5Cr 50% 5Cr

Issues invoice \rightarrow 1 Cr NA NC+B NA X
 w/o supply
 \rightarrow 1.5 Cr NA NC+B 14r+F X
v/s 132(1)(b)
 \rightarrow 3 Cr Arrest NC+B 34r+F X
 \rightarrow 10 Cr Arrest C+NB 54r+F X
 ↓
 132(1)(b) = Compromising
NA

	A	C+NB/NC+B	
Falsify records	1 Cr NA	NC+B	up to 6m or F or Both
	2 Cr NA	1—	1—
132(1)(f)	3 Cr NA	1—	1—
	10 Cr NA	1—	1—

25% x tax amt =



THANK YOU