



सत्यमेव जयते

प्रधान आयुक्त का कार्यालय,
Office of the Principal Commissioner,

केंद्रीय जीएसटी अहमदाबाद दक्षिण आयुक्तालय
Central GST, Commissionerate- Ahmedabad South,

अपराध और अधिनिर्णय खंड, अम्बावाड़ी, GST भवन, अहमदाबाद
३८००१५.

4th Floor, O&A Section, GST Bhavan, Ambawadi 380015



निबन्धित पावती डाक द्वारा/ By REGISTERED POST A.D.

फा.सं. /F.No. CGST/04-71/O&A/Fincare/2022-23

DIN-20230664WS0000999D17

आदेश की तारीख/Date of Order : 22-06-2023

जारी करने की तारीख/Date of Issue : 22-06-2023

द्वारा पारित/ Passed by: Shri Shrayan Ram, JOINT COMMISSIONER

मूल आदेश सं./Order-In-Original No. 04/CGST/Ahmedabad South/JC/SR/2023-24

यह प्रति उस व्यक्ति (यों) को, जिसके (जिनके) लिए यह आदेश जारी किया गया है, उसके(उनके) व्यक्तिगत उपयोग के लिए निःशुल्क प्रदान की जाती है।

This copy is granted free of charge for private use of the person(s) to whom it is sent.

यदि कोई व्यक्ति इस आदेश से स्वयं को असंतुष्ट अनुभव करता है, तो वह इस आदेश के विरुद्ध आयुक्त(अपील), केन्द्रीय जीएसटी, केन्द्रीय जीएसटी भवन, आंबावाड़ी, अहमदाबाद-15 को प्रारूप GST APL-01 में अपील कर सकता है। उक्त अपील पक्षकार पर आदेश तामील होने अथवा अथवा उसे डाक द्वारा प्राप्त करने की तारीख से दो माह के भीतर दाखिल की जानी चाहिए। इसपर रुपए 2.00/- केवल कान्यायालय शुल्क टिकट लगा होना चाहिए।

Any person deeming himself aggrieved by this Order may appeal against this order in Form GST APL-01 to Commissioner (Appeals), Central GST, Central GST Bhavan, Near Government Polytechnic, Ambawadi, Ahmedabad -15 within sixty days from date of its communication. The appeal should bear a court fee stamp of Rs.2.00/- only.

उक्त अपील सीजीएसटी/ एसजीएसटी नियम 2017के नियम 108 के प्रावधानों के अनुसार फॉर्म संख्या GST APL-01 में दाखिल की जानी चाहिए।

The Appeal should be filed in form No. GST APL-01 in accordance with provision of Rule 108 of the CGST/SGST Rules 2017.

निर्णयकी दो प्रतियाँ (उसमें से एक उस आदेश की प्रमाणित प्रतिलिपि होनी चाहिए जिसके विरुद्ध अपील की गई है) अथवा उक्त आदेश की अन्य प्रति जिसपर रु 2.00/- का न्यायालय शुल्क टिकट अवश्य लगा होना चाहिए।

Copies of the Decision (one of which at least shall be certified copy of the order appealed against) or copy of the said Order bearing a court feestamp of Rs.2.00/-.

उप धारा के(1) तहत कोई अपील नहीं भरी जायेगी, जब तक कि अपीलकर्ता ने भुगतान नहीं किया है-

(1) पूर्ण रूप से, कर ब्याज जुर्माना शुल्क और दंड की राशि का ऐसा हिस्सा, जो आक्षेपित आदेश से उत्पन्न होता है जैसा की उसके द्वारा स्वीकार किया गया है; और

(2) उक्त आदेश से उत्पन्न विवाद में कर की शेष राशि के दस प्रतिशत के बराबर राशि, (अधिकतम पच्चीस करोड़ रुपए के अधीन), जिसके सम्बन्ध में अपील दायर की गई है

[बशर्ते की धारा 129 की उप धारा (3) के तहत एक आदेश के खिलाफ कोई अपील दायर नहीं की जायेगी, जब तक कि अपीलकर्ता द्वारा पच्चीस प्रतिशत जुर्माना के बराबर राशि का भुगतान नहीं किया गया हो]

No appeal shall be filled under sub-section (1), unless the appellant has paid-

(a) In full, such part of the amount of tax, interest fine fee and penalty arising from the impugned order, as in admitted by him: and

(b) A sum equal to ten percent of the remaining amount of tax in dispute arising from the said order, [subject to a maximum of twenty five crore rupees] in relation to which the appeal has been filed.

[Provided that no appeal shall be filed against an ordered under sub-section (3) of section 129, unless a sum equal to twenty five percent of penalty has been paid by the appellant]

संदर्भ/Reference : कारण बताओ सूचना फा.सं. /F. No. CGST/WS0604/TRAN-1/Tran Verification/P-1/42/2019-20 dated 10.09.2021 issued to M/s. Fincare Small Finance Bank Limited, 301-306, 3rd Floor, Abhijeet V, Above West side, Law Garden, Mithakali Ahmedabad-380006.

Brief facts of the case:-

M/s. Fincare Small Finance Bank Limited, situated at 301-306,3rd Floor, Abhijeet V, Above West side, Law Garden, Mithakali, Ahmedabad-380 006 at (hereinafter referred to as the said "Tax Payer") are engaged in the manufacture/providing service of 'Supplier of Services, Supplier of Services, Recipient of goods or Services, Recipient of goods or Services'. They were registered with the Central Excise and Service Tax Department having Service Tax Registration No. AABCB6398NSD001 and at present holding GSTIN 24AABCB6398N1Z6. The said Tax Payer filed TRAN-1 on 26-12-2017 and has taken transitional credit of Central Excise/Service Tax amounting to Rs. 1,72,83,149/- in their electronic Credit ledger under Section 140 of the CGST Act, 2017.

2. Section 140 of the CGST Act, 2017 allows a registered person to take Cenvat credit of eligible duties carried forward in the return relating to the period ending with the day immediately preceding the appointed day, furnished by him under the existing law within such time and in such manner as may be prescribed subject to the conditions specified therein. The Explanations 1 & 2, below the said Section defines "eligible duties" the credit of which can be carried forward.

Further, the provision to section 140 of the CGST Act read as under; Provided that the registered person shall not be allowed to take credit unless the said credit was admissible as CENVAT credit under the existing law and is also admissible as input tax credit under the Act.

(a) Section 16 of the CGST Act, 2017 prescribed eligibility and conditions for taking input tax credit — (1) Every registered person shall, subject to such conditions and restrictions as may be prescribed and in the manner specified in section 49, be entitled to take credit of input tax charged on any supply of goods or services or both to him which are used or intended to be used in the course or furtherance of his business and the said amount shall be credited to the electronic credit ledger of such person. (2) Notwithstanding anything contained in this section, no registered person shall be entitled to the credit of any input tax in respect of any supply of goods or services or both to him unless,— he is in possession of a tax invoice or debit note issued by a supplier registered under this Act, or such other tax paying documents as may be prescribed;

3. In terms of the above provision the tax payers were required to possess and produce the documents for verification, whenever called for by the Department. In absence of the same admissibility of the credit cannot be established.

4. Whereas in order to ascertain/verify the admissibility of the transitional credit availed, the Tax Payer was requested to submit the documents based on which they have availed the said transitional credit in TRAN-1 vide letter F.No. CGST/WS0604/TRAN VERIFICATOIN/P-1/42/2019-20 dated 03.01.2020 subsequent to which reminders/email were issued for said information. However, in-spite of repeated request the taxpayer has not submitted the required documents for verifying the admissibility of transitional credit claimed by them. In absence of the required documents, this office is not in a position to arrive at the admissibility of transactional credit claimed by them. Then after, an intimation dated 03/09/2021 (Form GST DRC 01A) of tax ascertained being payable under Section 73(5)/74(5) of the CGST Act,2017 read with Rule 142(1A) of the CGST Rules, 2017 was issued to the taxpayer.

5. Whereas the Taxpayer has failed to submit the required documents, admissibility of geniuses of the credit could not be verified. Hence it appeared that the transitional credit amounting to Rs. 1,72,83,149/- availed by them is not admissible to them and the same requires to be recovered from them under the provisions of Section 73(1) of the CGST Act, 2017 read with Rule 121 of the CGST Rules, 2017 along with applicable interest under Section 50 of the CGST Act, 2017.

6. It further appeared that by not providing the documents called for, the Taxpayer has intentionally suppressed the information from the department. Thus, the Taxpayer appeared to have violated the provisions of Section 140 of the CGST Act, 2017 and have rendered themselves liable for penal action under the provisions of Section 122 (1) (xvii) of CGST Act, 2017.

7. Further, according to provision made under section 155 of the CGST Act, 2017, onus to prove admissibility of the credit availed lies on the assessee. Text of the said Section is reproduced hereunder:-

“155, Burden of proof .— Where any person claims that he is eligible for input tax credit under this Act, the burden of proving such claim shall lie on such person.”

In view of the above, the burden to prove the admissibility of the credit availed under Tran-I rest with the Tax Payer which they have not fulfilled by not providing the required documents for verification.

8. Therefore show cause notice F.No. CGST/WS0604/ Tran-1/Tran Verification/P-1/42/2019-20 dated 10/09/2021 was issued to the taxpayer M/s. Fincare Small Finance Bank Limited, situated at 301-306, 3rd Floor, Abhijeet V, Above West Side, Law Garden, Mithakali, Ahmedabad-380006 as to why:

1) The transitional credit of input tax amounting to Rs. 1,72,83,149/- (Rupees One Crore Seventy Two Lac Eighty Three Thousand One Hundred Forty Nine Only) wrongly carried forward and utilized by them, should not be demanded and recovered from them, under the provisions of Section 73(1) of the CGST Act read with the provisions of Rule 121 of the CGST Rules;

2) Interest should not be charged and recovered from them under the provisions of Section 50 of the CGST Act; and

3) Penalty should not be imposed on them under the provisions of Section 122 (1) (xvii) of the CGST Act on the grounds discussed herein above.

9. A corrigendum to the show cause notice F.No. CGST/WS0604/Tran-1/Tran Verification/P-1/42/2019-20 dated 10/09/2021 was issued under F.No.V/WS06/O&A/SCN-226/2021-22 dated 18/08/2022 by the Assistant Commissioner, CGST Division-VI, Ahmedabad South having his office at 3rd Floor, APM Mall, Seema Hall Road, Ahmedabad making the show cause notice answerable to the Joint Commissioner, Central Goods & Services Tax, Ahmedabad having his office at 6th Floor, Central GST Bhavan, Revenue Marg, Ambawadi, Ahmedabad-380015.

10. DEFENSE SUBMISSION

10.1 The tax payer has submitted their defense reply vide letter dated 03/11/2022 wherein they submitted that they had availed input tax credit through Tran -1 on the basis of ST-3 return filed by them. They have also submitted copy of last ST-3 return

for the financial year 2017-18 along with their reply. The taxpayer in their reply have submitted that M/s. Fincare Small Finance Bank Ltd (Formerly known as Disha Microfin Ltd) are having GST registration No. 24AABCB6398N1Z6; that they had centralized Service Tax registration during Service Tax regime for PAN India with Service Tax registration No. AABCB6398NSD001 and that post GST regime, they have registered State wise for their PAN India Banking operation; that during 2017, at the time of GST implementation, they have carried forward the Cenvat credit as on 30/06/2017 as per their ST-3 returns and have filed Tran-1 in respect of the same; that they are a scheduled commercial bank as per RBI regulations and having PAN India presence in multiple states and hence their Cenvat Credit balance of Rs.1,72,83,149/- availed during Service Tax regime on inputs related to banking operations have been carried forward to GST regime through TRAN-1 as per the prescribed manner in GST Act, 2017; that the genuineness of the credit and process has already been inspected by the Intelligence Unit of Ahmedabad, DGGI, AZU during 2019-20 and that they had submitted all the relevant documents and proved the correctness of the Cenvat credit with reconciliations; that they also attached the documents submitted to the DGGI during the investigation process.

11. PERSONAL HEARING:-

11.1 Personal hearing was held in virtual mode on 07/02/2023 before my predecessor wherein Shri Suresh Narasimha Murthy, DVP-Taxation appeared for the taxpayer. He reiterated the submissions made vide their letter dated 03/11/2022 and submitted that they are eligible for credit. Consequent to the issue of Establishment Order No.08/2023 dated 13.02.2023 (DGHRD/ADC/JC/11/2023), issued by the Commissioner, Central GST, Ahmedabad South, adjudication of this case is now assigned to the undersigned and therefore, a fresh personal hearing was granted to the taxpayer to appear on 22/02/2023 and 16/06/2023 to comply with the principles of natural justice. However none appeared for the personal hearing on the given dates.

12. DISCUSSION & FINDINGS:-

12.1 I have carefully gone through the facts of the case on record and the submissions made by the taxpayer in this regard. On recapitulating, I find that the issue involved in the present show cause notice, is related to admissibility of credit taken in TRAN-1 filed by the taxpayer. The issue is that the Tax-payer has taken transitional credit of Central Excise/Service Tax amounting to Rs.

1,72,83,149/- under Section 140 of the CGST Act 2017 read with rule 117 of CGST Rules 2017.

12.2 Now with regard to the demand of Rs. 1,72,83,149/-, I find that the taxpayer has declared/taken transitional credit of Central Excise/Service Tax amounting to Rs. 1,72,83,149/-. As per Section 140, the transitional mechanism for carrying forward the credit pending with the erstwhile registered persons or who was not liable to be registered under the existing law, to the GST regime. The details of the Section 140 of the CGST Act 2017 are reproduced herewith:-

"140. (1) A registered person, other than a person opting to pay tax under section 10, shall be entitled to take, in his electronic credit ledger, the amount of CENVAT credit carried forward in the return relating to the period ending with the day immediately preceding the appointed day, furnished by him under the existing law in such manner as may be prescribed:

Provided that the registered person shall not be allowed to take credit in the following circumstances, namely:—

(i) where the said amount of credit is not admissible as input tax credit under this Act; or

(ii) where he has not furnished all the returns required under the existing law for the period of six months immediately preceding the appointed date; or

(iii) where the said amount of credit relates to goods manufactured and cleared under such exemption notifications as are notified by the Government.

(2) A registered person, other than a person opting to pay tax under section 10, shall be entitled to take, in his electronic credit ledger, credit of the unavailed CENVAT credit in respect of capital goods, not carried forward in a return, furnished under the existing law by him, for the period ending with the day immediately preceding the appointed day in such manner as may be prescribed:

Provided that the registered person shall not be allowed to take credit unless the said credit was admissible as CENVAT credit under the existing law and is also admissible as input tax credit under this Act;

Explanation.—For the purposes of this sub-section, the expression “unavailed CENVAT credit” means the amount that remains after subtracting the amount of CENVAT credit already availed in respect of capital goods by the taxable person under the existing law from the aggregate amount of CENVAT credit to which the

said person was entitled in respect of the said capital goods under the existing law.

(3) A registered person, who was not liable to be registered under the existing law, or who was engaged in the manufacture of exempted goods or provision of exempted services, or who was providing work contract services and was availing of the benefit of notification No. 26/2012-Service Tax, dated 20th June, 2012 or the first stage dealer or a second stage dealer or a registered importer or a depot of manufacturer, shall be entitled to take in his electronic credit ledger, credit of eligible duties in respect of inputs held in stock and inputs contained in semi finished or finished [goods held in stock on the appointed day, within such time and in such manner as may be prescribed, subject to] the following conditions namely :-

- (i) Such inputs or goods are used or intended to be used for making taxable supplies under this Act;
- (ii) the said registered person is eligible for input tax credit on such inputs under this Act;
- (iii) the said registered person is in possession of invoice or other prescribed documents evidencing payment of duty under the existing law in respect of such inputs;
- (iv) Such invoices or other prescribed documents were issued not earlier than twelve months immediately preceding the appointed day; and
- (v) The supplier of the services is not eligible for any abatement under this Act:

Provided that where a registered person other than manufacturer or supplier of services, is not in possession of an invoice or any other documents evidencing payment of duty under the existing law in respect of such inputs, then, such registered person shall, subject to such conditions, limitations and safeguard as may be prescribed, including that the said taxable person shall pass on the benefit of such credit by way of reduced prices to the recipient, be allowed to take credit at such rate and in such manner as may be prescribed.

(4) A registered person, who was engaged in the manufacture of taxable as well as exempted goods under the Central Excise Act, 1944 (1 of 1944) or provision of taxable as well as exempted goods under Chapter V of the Finance Act, 1994 (32 of 1994), but

* which are liable to tax under this Act, shall be entitled to take, in his electronic credit ledger,--

(a) the amount of CENVAT credit carried forward in return furnished under the existing law by him in accordance with the provisions of sub section (1); and

(b) the amount of CENVAT credit of eligible duties in respect of inputs held in stock and inputs contained in semi finished or finished goods held in stock on the appointed day, relating to such exempted goods or services, in accordance with provisions of sub section (3).

12.3 Now let me look into the provision of law that determines eligibility and conditions for taking input tax credit.

Section 16 of the CGST Act provides as under:

SECTION 16. Eligibility and conditions for taking input tax credit. — (1) Every registered person shall, subject to such conditions and restrictions as may be prescribed and in the manner specified in section 49, be entitled to take credit of input tax charged on any supply of goods or services or both to him which are used or intended to be used in the course or furtherance of his business and the said amount shall be credited to the electronic credit ledger of such person.

(2) Notwithstanding anything contained in this section, no registered person shall be entitled to the credit of any input tax in respect of any supply of goods or services or both to him unless, —

(a) he is in possession of a tax invoice or debit note issued by a supplier registered under this Act, or such other tax paying documents as may be prescribed;

[(aa) the details of the invoice or debit note referred to in) clause (a) has been furnished by the supplier in the statement of outward supplies and such details have been communicated to the recipient of such invoice or debit note in the manner specified under section 37;]

(b) he has received the goods or services or both.

[**Explanation.** — For the purposes of this clause, it shall be deemed that the registered person has received the goods or, as the case may be, services —

(i) where the goods are delivered by the supplier to a recipient or any other person on the direction of such registered person, whether acting as an agent or otherwise, before or during movement of goods, either by way of transfer of documents of title to goods or otherwise;

(ii) where the services are provided by the supplier to any person on the direction of and on account of such registered person.]

(c) subject to the provisions of [section 41 or section 43A], the tax charged in respect of such supply has been actually paid to the Government, either in cash or through utilization of input tax credit admissible in respect of the said supply; and

(d) he has furnished the return under section 39 :

Provided that where the goods against an invoice are received in lots or instalments, the registered person shall be entitled to take credit upon receipt of the last lot or instalment :

Provided further that where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the input tax credit availed by the recipient shall be added to his output tax liability, along with interest thereon, in such manner as may be prescribed :

Provided also that the recipient shall be entitled to avail of the credit of input tax on payment made by him of the amount towards the value of supply of goods or services or both along with tax payable thereon.

(3) Where the registered person has claimed depreciation on the tax component of the cost of capital goods and plant and machinery under the provisions of the Income-tax Act, 1961 (43 of 1961), the input tax credit on the said tax component shall not be allowed.

(4) A registered person shall not be entitled to take input tax credit in respect of any invoice or debit note for supply of goods or services or both after the due date of furnishing of the return under section 39 for the month of September following the end of financial year to which such invoice or [* * *] debit note

- * *pertains or furnishing of the relevant annual return, whichever is earlier :*

[Provided that the registered person shall be entitled to take input tax credit after the due date of furnishing of the return under section 39 for the month of September, 2018 till the due date of furnishing of the return under the said section for the month of March, 2019 in respect of any invoice or invoice relating to such debit note for supply of goods or services or both made during the financial year 2017-18, the details of which have been uploaded by the supplier under sub-section (1) of section 37 till the due date for furnishing the details under sub-section (1) of said section for the month of March, 2019.]

12.4 From the perusal of the above provision of law it is evident that under provision of Section 140 (1), A registered person, other than a person opting to pay tax under section 10, shall be entitled to take, in his electronic credit ledger, the amount of CENVAT credit carried forward in the return relating to the period ending with the day immediately preceding the appointed day, furnished by him under the existing law in such manner as may be prescribed:

Provided that the registered person shall not be allowed to take credit in the following circumstances, namely:—

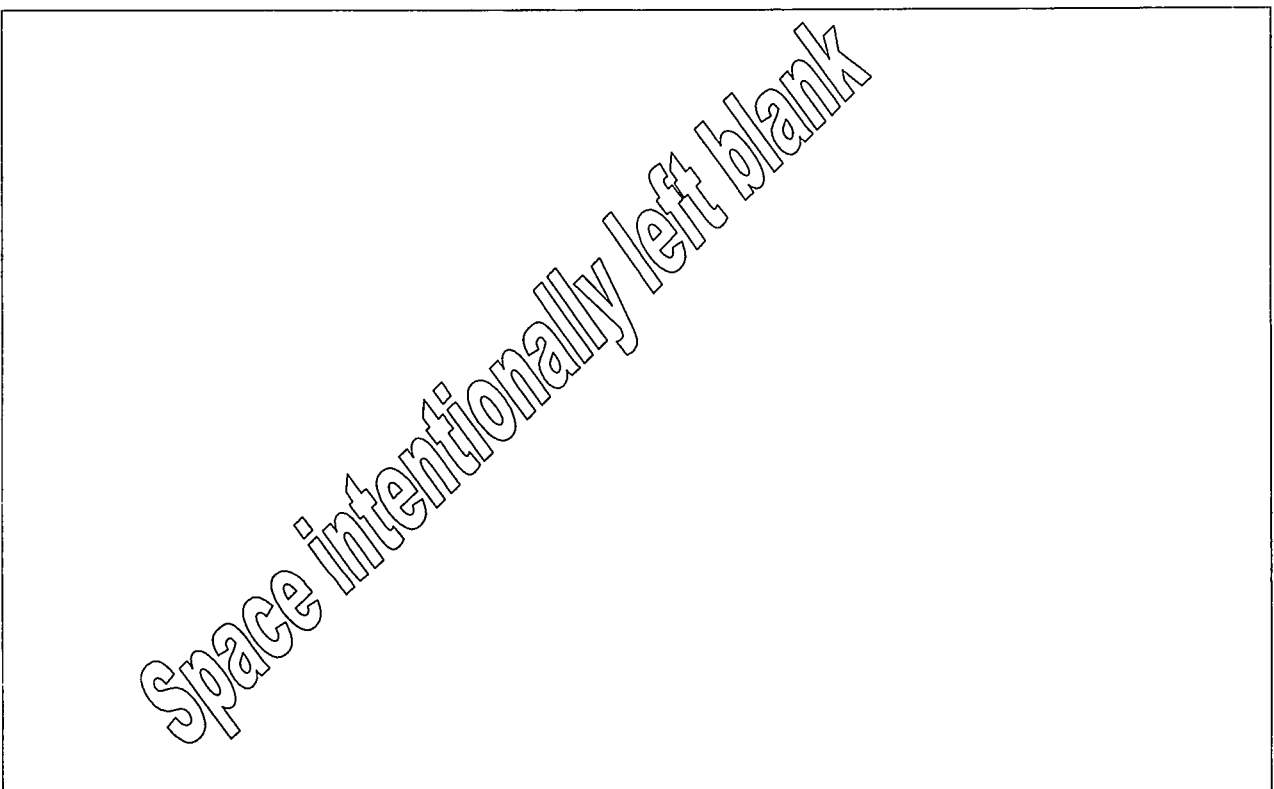
- (i) where the said amount of credit is not admissible as input tax credit under this Act; or*
- (ii) where he has not furnished all the returns required under the existing law for the period of six months immediately preceding the appointed date; or*
- (iii) where the said amount of credit relates to goods manufactured and cleared under such exemption notifications as are notified by the Government.*

12.5 In the instant case, I find that the tax-payer has taken transitional credit of Central Excise/ Service Tax amounting to Rs. 1,72,83,149/- under Section 140(1) of the CGST Act 2017 read with rule 117 of CGST Rules 2017. The taxpayer has filed Form GST TRAN-1 on 26/12/2017 and the same is reflected in their electronic credit ledger as CGST credit. The entire credit was carried forward in the return relating to the period ending with the day immediately preceding the appointed day (June-2017). It appeared that taxable person did not submit the relevant documents initially when called for, to verify admissibility of transitional credit claimed by them. In the absence of the requisite documents, it was not possible to ascertain admissibility of transitional credit claimed by them.

12.6 During the course of personal hearing on 07/02/2023, Shri Narasimha Murthy, DVP-Taxation appeared for the Tax-payer. He reiterated the submissions made vide their letter dated 03/11/2022, wherein they have submitted copy of TRAN-1. Copy of ST-3 returns as on 30th June,2017 and responses filed with DGGI, AZU Ahmedabad during investigation process.

12.7 The jurisdictional Officer is the competent authority to examine/ verify the correctness /admissibility of documents submitted for taking credit. I observe, that the taxpayer vide letter dated 03/11/2022 alongwith their reply had provided the documents for verification to the Assistant Commissioner.

12.8 In order to ascertain admissibility of credit mentioned in the Tran-1, a report was called for from the the Jurisdictional Deputy/Assistant Commissioner, Div.-VI, CGST, Ahmedabad South on 09/02/2023. I find that the verification of document to ascertain admissibility of the credit was verified by the Assistant Commissioner, Central Excise Div.-VI, Ahmedabad South vide letter F.No. CGST/WS06/O&A/SCN-226/2021-22 dated 13/02/2023. He reported the closing balance of eligible credit available in ST-3 returns as on 30/06/2017 to be Rs.1,85,22,156/- whereas the taxpayer has carried forward the credit of only Rs.1,72,83,149/- which is less than the actual amount of credit available to the taxpayer. The verification report dated 13/02/2023 in respect of the taxpayer for the eligibility of TRAN-1 amounting to Rs.1,72,83,149/- is reproduced hereunder:-



 <p>सत्यमेव जयते</p>	<p>सहायक आयुक्त केन्द्रीय वस्तु एवं सेवाकर का कार्यालय, मंडल-6, अहमदाबाद दक्षिण. OFFICE OF THE ASSISTANT COMMISSIONER OF CGST, DIVISION-VI, AHMEDABAD SOUTH. तृतीय मंजिल, ए पी एम माल, आनंदनगर रोड, सेटेलाइट, अहमदाबाद 3rd FLOOR, APM MALL, ANAND NAGAR ROAD, SATELLITE, AHMEDABAD-380015 Phone No.- 079-26775443 Email id – cgstdivisionvi@gmail.com</p>	
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F. No.: CGST/WS06/O&A/SCN-226/2021-22

Date: - 13.02.2023

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To,
Deputy Commissioner (O&A),
HQ, CGST, Ahmedabad South
Sir,

Sub: Show cause notice against M/s. Fincare Small Finance Pvt. Ltd : matter regarding.

Please refer to your office letter F. No. CGST/04-71/O&A/Fincare/22-23 dated 09.02.2023.

In this regard, the verification report regarding availability/genuineness of the credit carried forwarded by the above mentioned taxpayer is as under: -

Closing balance of eligible credit available in ST-3 return as on 30.06.2017.	Total eligible credit carry forward in TRAN-1	Remark
1,85,22,156/-	1,72,83,149/-	The taxpayer has availed less eligible credit as compared to balance cenvat credit available in ST-3 return as on 30.06.2017. Hence the credit availed by the taxpayer is found correct.

This is for information and further action in the matter please.

Yours faithfully,


(D. A. R. P. G.)
Assistant Commissioner
CGST, Div-VI
Ahmedabad South


12.9 In view of the above discussion and findings, perusal of the show cause notice, submissions made by the taxpayer, supporting documents and the verification report submitted by the jurisdictional Assistant Commissioner, CGST Division-VI,

Ahmedabad South, I conclude that the ITC amounting to **Rs. 1,72,83,149/- (Rupees One Crore Seventy Two Lakhs Eighty Three Thousand One Hundred Forty Nine Only)** has been correctly carried forward in TRAN-1 by the taxpayer and the same is admissible to them.

13. In view of the above discussion and findings, I pass the following Order:

ORDER

I vacate the entire proceedings against M/s. Fincare Small Finance Bank Limited, situated at 301-306, 3rd Floor, Abhijeet V, Above West Side, Law Garden, Mithakali, Ahmedabad-380006, initiated vide show cause notice F. No. CGST/WS0604/TRAN-1/Tran Verification/P-1/42/2019-20 dated 10.09.2021.


(Shравan Ram)
Joint Commissioner
Central GST, Ahmedabad South

By Registered Post A.D./Email

F.No. CGST/4-71/O&A/Fin Care/22-23

Date : 22/06/2023

To,

**M/s. Fincare Small Finance Bank Limited,
301-306,3rd Floor, Abhijeet V,
Above West Side, Law Garden,
Mithakali,Ahmedabad-380006.**

Copy to:

- (1) The Commissioner, CGST, Ahmedabad South
- (2) The Assistant Commissioner, CGST, Division-VI, Ahmedabad South
- (3) The Assistant Commissioner (TAR), CGST, Ahmedabad South
- (4) The Superintendent, Range-IV, Central Excise & CGST, Division-VI, Ahmedabad South for uploading DRC-07 on GSTN portal
- (5) The Superintendent (System), CGST, Ahmedabad South.
- (6) Guard File