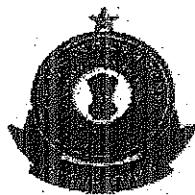


ANNEXURE VI

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सेवा कर प्रधान आयुक्त का कार्यालय

OFFICE OF THE PRINCIPAL COMMISSIONER OF SERVICE TAX

सेवा कर आयुक्तालय :: **SERVICE TAX COMMISSIONERATE**

11-5-423/1/A:: सीताराम प्रसाद टावर:: रेड हिल्स:: हैदराबाद - 500004

11-5-423/1/A::SITARAM PRASAD TOWER::RED HILLS::HYDERABAD-500004

O.R.No.131/2015-(Commr-Adjn.)-ST

Dated: 22.06.2016.

Name of the Assessee: M/s. Greenwood Estate

RECORD OF PERSONAL HEARING

Name & Designation

Signature

Represented by (1) Sri Sudhir VS, CA

V.A.
(SUDHIR VS)
22/6/16.

Sri Sudhir VS, CA has appeared before me for Personal hearing on behalf of M/s. Greenwood Estate. He has filed written submissions and a Brief Synopsis which are taken on record and reiterated the contents of the same. He highlighted that the demand is proposed the value in excess of sale deed, however, computation has considered even the value of the sale deed. They have made the remittance of the ST in excess of what is required. He finally requested to drop further proceedings in the matter.

(D. PURUSHOTHAM)
COMMISSIONER

ANNEXURE VII

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BEFORE THE COMMISSIONER OF SERVICE TAX, SERVICE TAX
COMMISSIONERATE, 11-5-423/1/A, SITARAM PRASAD TOWERS,
RED HILLS, HYDERABAD - 500004

Sub: Proceedings under OR No.131/2015 Adjn (ST) (Commr) [C.No. IV/16/197/2011 ST Gr. X] dated 21.10.2015 issued to M/s Greenwood Estates, #5-4-187/3 & 4, II Floor, Soham Mansion, MG Road, Secunderabad - 500003

FACTS OF THE CASE:

- A. Greenwood Estates, Secunderabad (hereinafter referred to as 'The Noticee') is mainly engaged in the sale of residential flats to prospective buyers during and after construction. However in case of flats for which occupancy certificate (OC) was received and booked after OC, sale deed is executed for the entire sale consideration in most cases. Only in some cases Sale deed is being executed for semi-finished construction along with an agreement of construction. Sale deed is registered and appropriate 'Stamp Duty' has been discharged on the same.
- B. Various charges are recovered under the said agreements as under:
- a. Value towards the sale deed
 - b. Value towards the construction agreement
 - c. Other Charges like electricity charges, etc.
 - d. Collection of taxes like VAT, Service Tax, Stamp Duty and Registration Charges from the buyer
- C. The levy of service tax on such arrangements has seen a fair share of litigation and amendments. The Noticee is also a party to the litigation process and matters for earlier periods are pending at various adjudication/judicial forums.
- D. In July 2012, the service tax law underwent a paradigm shift and importantly, the exemption for personal use available for construction of

residential complexes was removed. Accordingly, it became evident that service tax was payable on the construction agreement as per valuation prescribed under Rule 2A of the Service Tax (Determination of Value) Rules, 2012 i.e. on a presumed value of 40% of the contract value. The Noticee regularly discharged the service tax on the said value in normal course. It also discharged service tax on other charges. However, it did not discharge service tax on sale deed value, which is in the nature of immovable property and on the value of taxes collected.

E. The detailed working of the receipts and the attribution of the said receipts was already provided to the Department authorities, identified receipt wise and flat wise. The summary of the same is provided hereunder:

Description	Receipts	Non taxable	Taxable
Sum of towards sale deed	135190266	135190266	
Sum of towards agreement of construction	3987512		3987512
Sum of towards other taxable receipts	251919		251919
Sum of towards VAT, Registration charges, etc	5155789	5155789	
Total	144585486	140346065	4239431

F. Accordingly, the value of taxable services constituted 40% of Rs.42,39,431/- i.e. Rs.16,95,772/- and the service tax thereon @ 12.36% constituted Rs.2,09,597/-. It was also explained that the actual payment of service tax amounted to Rs.3,82,643/- which was more than the tax required to be paid.

G. This excess payment is due to that at the time of giving statements the value of sale deed was at times not determined. Sale deed was executed at a later date and an *adhoc* value for sale deed was adopted for purposes of estimating service tax liability. Now the project has been

completed and there is finality in the value of sale deed. The excess so paid has not been claimed as refund.

H. Previously several SCN's were issued covering the period upto December 2013 with sole allegation that "services rendered by them after execution of sale deed against agreements of construction to each of their customers to whom the land was already sold vide sale deed are taxable services under "works contract service".

- a. Vide Para 7 of SCN dated 21.05.2010 and Para 13 of the Order adjudicating the said SCN
- b. Vide Para 7 of Second SCN dated 23.04.2011
- c. Vide Para 6 of third SCN dated 24.04.2012
- d. Vide Para 4 of fourth SCN dated 02.12.2013
- e. Vide Para 4 of fifth SCN dated 25.09.2014

In all the above SCN's, there is error in as much including the value of sale deeds within the ambit taxable value while alleging (service tax is liable only after execution of sale deed i.e. on construction agreements.

I. The present status of SCN's as referred above is as follows:

Period	SCN	Amount	Status
Jan 09 to Dec 09	HQPQR No. 77/2010 Adjn (ST) dated 21-05-2010	Rs.9,47,737/-	CESTAT waived the pre-deposit of the taxes and penalty. Disposal of main appeal is pending
Jan 10 to Dec 10	OR No.61/2011, dated 23-04-2011	Rs.48,00,391/-	CESTAT vide order dated 02.04.2014 and Com(A) vide OIA No. 39/2013 dated
Jan 11 to Dec 11	OR No. 52/2012 Adjn (Addl Commr) dated 24-04-2012	Rs.46,81,850/-	27.02.2013 has sent the matter back to the Adjudicating authority for de-novo consideration for quantification of

			service tax liability. The now the matter is pending before lower authority
Jan 12 to June 12	OR No.83/2013 Adjn (ST) ADC dated 02.12.2013	Rs.16,53,853/-	Pending before CESTAT for disposal of final hearing (an appeal against Order-In-Original No. HYD-SVTAX-000-COM-02-14-15 dated 20.02.2015 has been filed)
January 2012 to December 2013 (referred to in SCN as March 2014)	OR No. 156/2014- Adjn (ST)(Commr) dated:25-09-2014	Rs. 92,38,975/-	

J. Now the present SCN was also issued with similar error of quantifying the proposed demand of service tax in as much treating the sale deed values & other taxes as taxable value of services (annexure to SCN) while alleging that service rendered after execution of sale deed alone liable for service tax (Para 2 of SCN).

K. The liability for the impugned period and the details of the payments is summarized in the below mentioned table for ready reference:

Particulars	Amount (Rs.)
Gross Receipts	144585486
Less: Deductions	
Sale Deed Value	135190266
VAT, Registration charges, stamp duty and other non taxable receipts	5155789
Taxable amount	4239431
Abatement @ 40%	1695772
Service Tax @ 12.36%	209597
Actually Paid	382643
Excess Paid	173046

However, present show cause notice is issued for the period January 2014 to March 2015 i.e. under new service tax law where there is a substantial changes in the provisions of service tax from positive list based taxation to negative list based taxation, thereby exemption and abatement has also undergone change. Accordingly, the grounds of the old period is not at all applicable for the new period due to the following substantial changes.

- a. Taxable service list provided under section 65(105) of the Finance Act, 1994 ceases to effect w.e.f. 01-07-2012.
- b. Section 65A pertaining to classification of service ceases to effect.
- c. There is no concept of classification of service.
- d. Definition of service introduced under section 65B(44) *where it contains certain exclusions.*
- e. Negative list introduced in section 66D of the Finance Act, 1994.
- f. Concept of bundled service introduced in section 66F.
- g. New definition of works contract has been introduced under section 65B(90) of the Finance Act, 1994.
- h. Mega exemption notification provided under Notification No. 25/2012-ST dated 20.06.2012, which is available irrespective of classification of service. (earlier exemption was subject to classification of service)
- i. New Valuation Rule provided vide Rule 2A of The Service Tax (Determination of Value) Rules, 2006 vide Notification 24/2012-ST dated 20.06.2012 for determination of tax liability in case of works contract service.

- j. Abatement for various services issued under notification no 26/2012-ST dated 20.06.2012 is issued based on the nature of the service irrespective of its classification (earlier abatement was subject to classification of service)
3. Noticee submits that from the above it is clear that there is a substantial changes in the service tax law w.e.f. 01-07-2012. Accordingly, the allegations made in the previous show cause notice for the period upto 31.03.2012 is not applicable and not relevant for the period from 01.07.2012 onwards. As the subject show cause notice has considered various irrelevant and non-applicable grounds provisions of section 73(1A) is not applicable to the present case, which needs to be dropped.
4. Once SCN raises allegation/demand based on inapplicable provisions then such allegation/demand cannot sustain. In this regard reliance is placed on Maharashtra Industrial Development Corporation Vs CCE, Nasik 2014 (36) S.T.R. 1291 (Tri. - Mumbai) wherein it was held that *"With regard to the show cause notice in Appeal No. ST/85267/14 we find that the period involved is 1-10-2011 to 30-9-2012. In the said case, the demand is for two periods - one from 1-10-2011 to 30-6-2012 and the second is from 1-7-2012 to 30-9-2012 when the negative list came into effect but the show cause notice has been issued on the basis of definition of Management, Maintenance and Repair service has stood prior to 1-7-2012. Therefore, as post-1-7-2012 the provisions are not existing therefore, the demands for the period post-1-7-2012 are not maintainable"*

Submissions:

1. Noticee submits that the subject show cause notice in para 5 extracted the provisions of section 73(1A) of the Finance Act, 1994 and in para 6 mentions that the grounds as explained in the show cause notice issued for the earlier period is also applicable for the present case. Hence, this statement of demand / show cause notice is issued in terms of section 73(1A) of Finance Act, 1994, for the period January 2014 to March 2015. For this, Noticee submits that section 73(1A) of the Finance Act, 1994 reads as follows.

"(1A) Notwithstanding anything contained in sub-section (1) (except the period of eighteen months of serving the notice for recovery of service tax), the Central Excise Officer may serve, subsequent to any notice or notices served under that sub-section, a statement, containing the details of service tax not levied or paid or short levied or short paid or erroneously refunded for the subsequent period, on the person chargeable to service tax, then, service of such statement shall be deemed to be service of notice on such person, subject to the condition that the grounds relied upon for the subsequent period are same as are mentioned in the earlier notices."

2. Noticee submits that from the analysis of provisions of section 73(1A), it is clear that to issue show cause notice / statement under this section, the grounds relied upon for the subsequent period should be same in all aspect as mentioned in the previous notices. Further, the subject show cause notice has not mentioned which earlier show cause notice it has referred i.e. show cause notice issued under the old service tax law.

5. Noticee submits that as the subject SCN is issued without any allegations, the same has not proved the burden of proof of taxability, which is essential under new service tax law. In this regard to Noticee wishes to rely on the following decisions.

- a. United Telecom Ltd. Vs CST 2008 (9) S.T.R 155 (Tri-Bang)
- b. Jetlite (India) Ltd. Vs CCE 2011 (21) S.T.R 119 (Tri-Del)

In light of the above judgments where the Department alleges that the service is taxable, the burden lies upon the Department to establish the taxability. In the present case, the department failed to discharge the burden as no evidence was placed on record to establish that the service is taxable. On the basis of the same, Noticee submits that subject show cause notice is not sustainable and requires to be dropped.

6. Noticee submits that undoubtedly they are discharging service tax on construction agreements thereby paying service tax on activity as proposed by impugned SCN read with earlier SCN's. SCN included the value of sale deeds only at the time of quantifying the demand. As seen from the operative part of SCN, it is clear that it is only sole allegation of SCN (Para 2) that construction agreements are subject to service tax under the category of "works contract", no allegation has been raised to demand service tax on the sale deed value.

7. As stated in the background facts, the Noticee started paying service tax on the value of "construction agreements" from July 2012 onwards. Thereafter, the said taxes have been regularly paid. This is also evident from the fact that the current SCN proposes appropriation of taxes

already paid by them. The details of the taxes paid are also acknowledged in Para 4 of the SCN. On a perusal of the SCN, it is evident that the issue in the current SCNs is therefore limited to the aspect of quantification of demand. On a perusal of Para 4 of the SCN which quantifies the demand, it can be easily inferred that the demand is quantified based on statements submitted by the Noticee. The said statements for the periods are marked as Annexure "A".

8. On going through the statements provided by the Noticee, it can be seen that a detailed breakup of the receipts into receipts towards "sale deeds", receipts towards "construction agreements", receipts towards other taxable receipts and receipts towards other non-taxable receipts was provided.
9. However, on going through the annexure to the SCN, it can also be observed that though the allegation is to demand service tax on construction agreements, the quantification is based on gross amounts mentioned above for all the activities including amounts received towards the "sale deeds".
10. It is therefore apparent that the SCN represents an error in quantification of the demand. It may be noted that the Noticee have regularly and diligently discharged Service Tax on the value of "construction agreements" after June 2012 onwards. The above is explained through a comparative chart provided below:

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Particulars	As per Noticee	As per SCN
Gross Receipts	144585486	144258486
Less Deductions		
Sale Deed Value	135190266	
VAT, Registration charges, stamp duty and other non taxable receipts	5155789	4417600
Taxable amount	4239431	139840886
Abatement @ 40%	1695772	55936354
Service Tax @ 12.36%	209597	6913733
Actually Paid	382643	0
Balance Demand	(176046)	6913733

11. The Noticee submit that once the apparent error in calculation is taken to its logical conclusion, the entire demand fails and therefore there is no cause of any grievance by the department on this ground.

12. Since SCN read with earlier SCN's agree on the principle that service tax cannot be demanded on the value attributable to sale deeds, the Noticee is not making detailed grounds on the legal merits of the said claim and would like to submit the following broad lines of arguments:

- a. In many cases, the "sale deed" is entered into after the completion of the building and therefore the demand cannot be justified under the said entries.
- b. Till the stage of entering into a "sale deed", the transaction is essentially one of sale of immovable property and therefore excluded from the purview of Service Tax.
- c. In any case, the deeming fiction for construction services prior to completion cannot be classified under works contract services since doing the same would render Section 66E(b) of Finance Act, 1994 & Notification 26/2012 ST dated 20.06.2012 redundant.

d. If at all a view is taken that the value of "sale deed" is liable to service tax, the benefit of the above notification should be granted after reclassification of the service.

13. The Appellants also reserve their right to make additional arguments as felt necessary on this aspect of service tax on value of "sale deeds" if it is ultimately held that this aspect could be taken up without an allegation in the SCN.

14. Similar to the claim for exclusion of sale deed value, the value attributable to statutory taxes/charges like VAT, service tax, registration charges, stamp duty, electricity etc., need to be reduced. It is submitted that once the above deductions are allowed, the demand would be reduced to NIL.

Interest and penalties

15. Without prejudice to the foregoing, noticee submits that when service tax itself is not payable, the question of interest does not arise. Noticee further submits that it is a natural corollary that when the principal is not payable there can be no question of paying any interest as held by the Supreme Court in Prathiba Processors Vs. UOI, 1996 (88) ELT 12 (SC).

16. Without prejudice to the foregoing, Noticee submits that penalty is proposed under section 77. However, the subject show cause notice has not provided any reasons as to why how penalty is applicable under section 77 of the Finance Act, 1994. Further, the Noticee is already registered under service tax under works contract service and filing

returns regularly to the department. Accordingly, penal provisions mentioned under section 77 is not applicable for the present case. As the subject show cause notice has not considered these essential aspects, the proposition of levying penalty under section 77 is not sustainable and requires to be dropped. reliance is placed on M/s Creative Hotels Pvt. Ltd. Vs CCE, Mumbai (2007) (6) S.T.R (Tri-Mumbai) and M/s Jewel Hotels Pvt Limited Vs CCE, Mumbai-1 (2007) (6) S.T.R 240 (Tri- Mumbai)

17. The Noticee submits that imposition of penalty cannot be merely an automatic consequence of failure to pay duty hence the proposal of the show cause notice imposing the penalty requires to be set aside.
18. The Noticee submits that they are under bona fide belief that the amounts received towards sale deeds are not subjected to service tax. It settled position of the law that if the Noticee is under bona fide belief as regards to non taxability imposition of the penalties are not warranted. In this regards wishes to rely on the following judicial pronouncements.

- CCE-II Vs Nita Textiles & Industries 2013 (295) E.L.T 199 (Guj)
- CCE, Bangalore-II Vs ITC Limited 2010 (257) E.L.T 514 (Kar)
- Larsen & Toubro Ltd Vs CCE., Pune-II 2007 (211) E.L.T 513 (S.C)
- Centre For Development Of Advanced Computing Vs CCE, Pune 2002 (141) E.L.T 6 (S.C).

Benefit under section 80

19. Noticee submits that there is bona fide litigation is going on and issue was also debatable which itself can be considered as reasonable cause for failure to pay service tax. Accordingly waiver of penalty under section can be made. In this regard reliance is placed on C.C.E., & Cus., Daman v. PSL Corrosion Control Services Ltd 2011 (23) S.T.R. 116 (Guj.)

20. Noticee submits that as explained in above Para's they are not paying service tax on bonafide belief that same was not liable to be paid in view of

- a. Exclusion part of service definition given under section 65B(44) of Finance Act, 1994 in as much specifically excluding the sale of immovable property from levy of service tax.
- b. Activity performed till the execution of sale deed is in the nature of self service and not liable for service tax.
- c. Activity of construction undertaken by the developer would be works contract only from the stage the developer enters into a contract with the flat purchaser and not prior to that.
- d. Earlier SCN's demanding service tax on the value of construction agreement.

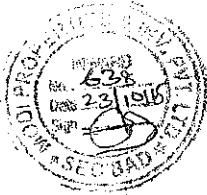
21. The Noticee submits that they have established the reasonable cause for the non-payment of service tax. Since the Noticee explained the reasonable cause for the nonpayment of the service tax, penalty imposition of the penalty is not sustainable. In this regard we wish to rely on Commissioner of Service Tax, Bangalore Vs Motor World 2012 (27) S.T.R 225 (Kar).

22. Noticee craves leave to alter, add to and/or amend the aforesaid grounds.

23. Noticee wishes to be heard in person before passing any order in this regard.

For M/s Greenwood Estates,

Authorized Signatory



सेवा कर प्रधान आयुक्त का कार्यालय

OFFICE OF THE PRINCIPAL COMMISSIONER OF SERVICE TAX
सेवा कर आयुक्तालय, हैदराबाद-:: SERVICE TAX COMMISSIONERATE,
HYDERABAD

11-5-423/1/A:: सीताराम प्रसाद टावर:: रेड हिल्स:: हैदराबाद-4

11-5-423/1/A:: SITARAM PRASAD TOWER:: RED HILLS:: HYDERABAD-4

OR No.131/2015 - Adjn.(ST)(Commr)
C.No: IV/16/197/2011-ST.Gr.X

Dated:21.10.2015.

SHOW CAUSE NOTICE

(Notice under Section 73(1A) of the Finance Act 1994)

Sub::Service Tax - Non-Payment of Service Tax on Taxable Services rendered by M/s. Greenwood Estates, Hyderabad- Issue of Show Cause Notice - Regarding.

M/s. Greenwood Estates, #5-4-187/3 & 4, II Floor, Soham Mansion, MG Road, Secunderabad-500 003 (here-in-after referred as "M/s Greenwood" or "the assessee(s)") are engaged in providing "Works Contract Service". The assessee is a registered partnership firm and got themselves registered with the department vide Service Tax Registration Number AAHFG0711BST001.

2. As seen from the records, the assessee entered into i) sale deed for sale of undivided portion of land together with semi finished portion of the flat and ii) agreement for construction, with their customers. On execution of the sale deed the right in a property got transferred to the customer, hence the construction service rendered by the assessees to their customers under agreement of construction is classifiable under " Works Contract Service" under Section 65 (105) (zzzza) under Service tax as there exists service provider and receiver relationship between them. As there is transfer of property in goods in execution of the said construction agreements, it appears that the services rendered by them after execution of sale deed against agreements of construction to each of their customers to whom the land was already sold are taxable services under "Works Contract Service".

3. Accordingly, the following Show Cause Notices had been issued to the assessee:

Sl. No.	SCN O.R. No. Date	Period	Amount of Service Tax demanded in Rs.	Status
1	HQPOR No. 77/2010-Adjn (ST), dated 21-5-2010	Jan-Dec, 2009	9,47,737	Confirmed vide OIO No. 47/2010-ST, dt. 24-11-2010. Party's appeal was dismissed vide OIA No. 11/2011 (H-II) S.Tax, dated 31-1-2011. CESTAT Granted Stay on 25.04.2012 vide stay Order No.666 & 667/2012 without pre deposit condition. Vide Misc Order No.21860-21877/2014 dt.31.07.2014 extended stay for six months from 31.07.2014.
2	OR No. 61/2011, dt. 23-4-2011	Jan-Dec, 2010	48,00,391	Confirmed vide OIO No. 51/2012-Adjn (ST)(ADC), dated 31-8-2012. Ordered <i>de novo</i> by the Commissioner (Appeals) vide OIA No. 39/2013 (H-II) S.Tax for re-quantification of the Service Tax payable.
3	OR No. 52/2012-Adjn (Addl.Commr.), dt. 24-4-2012	Jan-Dec, 2011	46,81,850	Confirmed vide OIO No. 51/2012-Adjn (ST)(ADC), dated 31-8-2012. Ordered <i>de novo</i> by the Commissioner (Appeals) vide OIA No. 39/2013 (H-II) S.Tax for re-quantification of the Service Tax payable.
4	O.R.No.83/2013 Adjn. (ST) ADC dated 02.12.2013	Jan-June 2012	16,53,856	An amount of Rs.15,64,777/- towards ST has been confirmed vide OIO No.HYD-SVTAX-000-COM-02-14-15 dated: 20.02.2015.
5	O.R.No.156/2014-Adjn (ST) (Commr). dated:25-09-2014.	July, 2012 to March , 2014	92,38,975/-	An amount of Rs.89,57,783/- only towards ST has been confirmed for the period July, 2012 to December, 2013 vide OIO No.HYD-SVTAX-000-COM-02-14-15 dated: 20.02.2015. The S.Tax amount of Rs.14,96,770/-for the period 01/2014 to 03/2014 is not covered in the demand of Rs.92,38,975/-hence a fresh SCN covering the period from 01/14 to 03/14 along with payable amounts for the period 04/14 to 03/15 is issued, as observed by the Adjudicating authority.

4. In the Show Cause Notice vide O.R.No.156/2014-Adjn (ST) (Commr) dated:25-09-2014, covering period July'2012 to March'2014, in the Annexure to the said Show Cause Notice, which gives detailed calculation of the service Tax liability for the

relevant period, there are 5 quarters period for which calculations are indicated separately. However, the service tax liability has been reckoned only for the period upto December'2013 and the service tax liability for the period January'2014 to March'2014 has not been added in the total while arriving at the tax liability which was demanded in the Show Cause Notice. Hence, the present Show Cause Notice covers period **January, 2014 to March, 2015**, which is inclusive of January'2014 to March'2015.

4.1 As per the information furnished by the assessee vide their letter dated 17.09.2014, 27.09.2014, 27.10.2014, 19.02.2015, 25.05.2015, 27.08.2015 and 18.09.2015 along with statements, it is seen that "the assessee" have rendered taxable services under the category of "Works Contract Services" during the period **January, 2014 to March, 2015**. The assessee had rendered services for a taxable value of **Rs. 14,42,58,886/- (Rupees Fourteen Crores, Forty two Lakhs Fifty eight Thousand Eight Hundred and eighty six only)**. After deduction of VAT of **Rs.44,17,600/-** the taxable value works out to **Rs.13,98,40,886/-** on which service tax (including Education and S & H.E cess) works out to **Rs.69,13,733/-**. An amount of **Rs.69,13,733/-**, unpaid paid for the services rendered during the said period, is detailed in the **Annexure enclosed**.

5. Vide Finance Act, 2012, sub section (1A) was inserted in Section 73 which reads as under:

SECTION 73 (1A) - Notwithstanding anything contained in sub-section (1) (except the period of eighteen months of serving the notice for recovery of service tax), the Central Excise Officer may serve, subsequent to any notice or notices served under that sub-section, a statement, containing the details of service tax not levied or paid or short levied or short paid or erroneously refunded for the subsequent period, on the person chargeable to service tax, then, service of such statement shall be deemed to be service of notice on such person, subject to the condition that the grounds relied upon for the subsequent period are same as are mentioned in the earlier notices.

6. The grounds as explained in the show cause cum demand notices issued above are also applicable to the present case. Hence, this statement of demand/show cause notice is issued in terms of Section 73 (1A) of the Finance Act, 1994 for the period **January, 2014 to March, 2015**.

7. In view of the above, M/s Greenwood Estates, 5-4-187/3 & 4, II floor, Soham Mansion, M.G.Road, Secunderabad-500 003, are hereby required to show cause to the Commissioner of Service Tax, Office of the Principal Commissioner of Service Tax, Hyderabad-Service Tax Commissionerate, 11-5-423/1/A, Sitaram Prasad Tower, Red Hills, Hyderabad- 500004 within 30 (thirty) days of receipt of this Notice as to why:-

- (i) An amount of **Rs.69,13,733/- (Rupees Sixty nine Lakhs thirteen Thousand Seven Hundred and thirty three only)** including Education

and S & H.E cess, should not be demanded from them on the "Works Contract Services" rendered by them during the period January, 2014 to March, 2015;

- (ii) Interest on the amount at Sl.No. (i) above at appropriate rates should not be demanded under **Section 75 of the Finance Act 1994**;
- (iii) Penalty should not be imposed on them under **Section 76 of the Finance Act 1994**; and
- (iv) Penalty should not be imposed on them under **Section 77 of the Finance Act, 1994**.

8. M/s. Greenwood Estates, Hyderabad at the time of showing cause as above are required to produce all the evidence upon which they intend to rely in their defence. They are also required to indicate in their written reply whether they wish to be heard in person before the case is adjudicated. If no cause is shown against the action proposed to be taken within the stipulated time or having desired a hearing if they do not appear for the personal hearing on the appointed day & time, the case will be decided on merits, basing on the material/evidence available on record.

9. The assessee filed the relevant ST-3 return on 25.05.2014 for the period October, 2013 - March, 2014 (due date being on 25.04.2014) hence, the due date for issue of this SCN is 24.10.2015.

10. This notice is issued without prejudice to any other action that may be taken against the noticees / others under the Finance Act, 1994 or under any other law for the time being in force in India.

11. Reliance for issue of this notice is placed on the following:

1. Letter dated 17.09.2014, 27.09.2014, 27.10.2014, 19.02.2015, 25.05.2015 , 27.08.2015 and 18.09.2015 along with statements, submitted by M/s. Greenwood Estates, Hyderabad.
2. ST-3 Returns submitted by the assessee for the period October'2013 to March'2015.



(D. PURUSHOTHAM)
COMMISSIONER

To

M/s. Greenwood Estates,
5-4-187/3 & 4, 2nd Floor,
Soham Mansion,
MG Road, Secunderabad – 500 003. (By SPEED POST)

Copy to:

1. The Assistant Commissioner of Service, Hyderabad Service Tax Division-II, Hyderabad.
2. The Superintendent (Adjudication), Hqrs. Office, Hyderabad Service Tax Commissionrate, Hyderabad.
3. The Superintendent, Range-II-A, Hyderabad Service Tax Commissionrate, Hyderabad.
4. Master / Spare copy.

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ANNEXURE

M/s GREEN WOOD ESTATES

From 01.01.2014 to 31.03.2015

<u>Before OC</u>		<u>After OC</u>		<u>TOTAL Tax payable</u>
Gross Receipts	21,212,565	Gross Receipts	123,045,921	144,258,486
Less VAT & Registration	374,517	Less VAT & Registration	4,043,083	4,417,600
Net Receipts	20,838,048	Net Receipts	119,002,838	139,840,886
Tax Rate	4.944%	Tax Rate	4.944%	
Total Tax Payable	1,030,233		5,883,500	6,913,733

(Signature)
अधीक्षक (रेंज - II A)
Superintendent (Range - II A)
मेरा कर प्रधान अधिकारी का कार्यालय
Mr. the Principal Commissioner of Service Tax
हैदराबाद/HYDERABAD.

ANNEXURE

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Estimated Tax Liability

Block No	File No	OC Date	Booking Date	Receipt No	Receipt Date	Receipt Amount	Towards Sale Deed			Towards Agreement of			Towards Construction			Towards VAT and Registration Charges			Towards Other Non-Taxable Receipts			Bookings after OC (Yes=0, No=1)	Receipts towards Agreements			Receipts before completion of contracts towards Agreements			Receipts of construction for flats			Receipts towards Agreements of construction for flats			Tax rate under works	Estimated Tax Liability based on DC	Estimated Tax Liability
							Towards Sale Deed	Towards Agreement of	Towards Construction	Towards VAT and Registration Charges	Towards Other Non-Taxable Receipts	Bookings after OC (Yes=0, No=1)	Receipts towards Agreements	Receipts before completion of contracts towards Agreements	Receipts of construction for flats	Receipts towards Agreements of construction for flats	Tax rate under works	Estimated Tax Liability based on DC	Estimated Tax Liability																		
A 114	8-Apr-13	26-Jan-14	3543	4-Mar-14	500,000	-	500,000	-	-	-	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-						
A 114	8-Apr-13	26-Jan-14	3544	4-Mar-14	260,763	-	260,763	-	-	-	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24,720					
A 114	8-Apr-13	26-Jan-14	3603	2-Apr-14	150,000	-	-	35,237	-	-	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944					
A 114	8-Apr-13	26-Jan-14	3714	6-May-14	72,187	-	-	-	-	-	-	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944						
A 118	8-Apr-13	11-Apr-13	3742	29-May-14	588,505	-	313,000	-	-	-	-	35,158	-	240,347	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,742					
A 118	8-Apr-13	11-Apr-13	3780	7-Jul-14	78,308	-	-	-	-	-	-	34,958	-	43,350	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,738					
A 123	8-Apr-13	18-Jan-12	3482	16-Jan-14	67,651	-	-	-	-	-	-	67,651	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-						
A 123	8-Apr-13	18-Jan-12	3483	16-Jan-14	1,143	-	-	-	-	-	-	1,143	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944						
A 125	8-Apr-13	28-Feb-14	3798	31-Jul-14	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944						
A 125	8-Apr-13	30-Nov-14	3621	5-Dec-14	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944						
A 125	8-Apr-13	30-Nov-14	3862	15-Dec-14	200,000	-	200,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 125	8-Apr-13	30-Nov-14	3863	30-Dec-14	286,000	-	286,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 125	8-Apr-13	30-Nov-14	3906	21-Feb-15	1,871,729	-	1,871,729	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 127	8-Apr-13	18-Jun-13	3712	28-Apr-14	361,547	-	-	-	-	-	-	53,697	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,902							
A 127	8-Apr-13	18-Jun-13	3763	30-Jun-14	2,126	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 128	8-Apr-13	20-Apr-14	3609	21-Apr-14	25,000	-	-	-	-	-	-	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 128	8-Apr-13	20-Apr-14	3779	7-Jul-14	400,000	-	400,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 128	8-Apr-13	20-Apr-14	3857	22-Nov-14	2,400,381	-	2,400,381	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 128	8-Apr-13	20-Apr-14	3860	1-Dec-14	250,000	-	-	54,619	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 129	8-Apr-13	14-Nov-13	3465	2-Jan-14	1,600,000	-	1,600,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 129	8-Apr-13	14-Nov-13	3567	14-Mar-14	500,000	-	500,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944							
A 129	8-Apr-13	14-Nov-13	3701	11-Apr-14	200,000	-	200,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 129	8-Apr-13	14-Nov-13	3746	5-Jun-14	80,000	-	80,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 133	8-Apr-13	13-Aug-13	3597	5-Apr-14	770,000	-	494,495	-	-	-	-	40,099	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 134	8-Apr-13	26-Jun-14	3616	27-Jun-14	25,000	-	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,982								
A 134	8-Apr-13	26-Jun-14	3805	21-Aug-14	400,000	-	400,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 134	8-Apr-13	26-Jun-14	3910	28-Feb-15	2,405,813	-	2,405,813	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 134	8-Apr-13	26-Jun-14	3919	27-Mar-15	262,487	-	49,187	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	213,300								
A 209	8-Apr-13	26-Jan-14	3485	28-Jan-14	25,000	-	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 209	8-Apr-13	26-Jan-14	3548	4-Mar-14	200,000	-	200,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								
A 209	8-Apr-13	26-Jan-14	3782	10-Jun-14	1,722,486	-	1,722,486	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944								

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Block No	Fiat No	OC Date	Booking Date	Receipt No	Receipt Date	Receipt Amount	Towards Sale Deed		Towards VAT and Registration Charges		Towards Other Taxable Receipts		Towards VAT and Registration Charges		Towards VAT and Registration Charges		Towards Other Non-Taxable Receipts		Bookings After OC (Yes=0, No=1)		Receivable Receipts		
							Towards Agreement of Construction	Towards Sale Deed	Towards VAT and Registration Charges	Towards Other Taxable Receipts	Towards VAT and Registration Charges	Receivable Receipts	Receivable Receipts	Receivable Receipts	Receivable Receipts								
A	417	8-Apr-13	31-Dec-13	3585	29-Mar-14	67,000																	
A	417	8-Apr-13	31-Dec-13	3595	3-Apr-14	2,300,000																	
A	417	8-Apr-13	31-Dec-13	3835	27-Oct-14	71,156																	
A	421	8-Apr-13	20-Oct-13	3467	4-Jan-14	2,394,515																	
A	421	8-Apr-13	20-Oct-13	3498	23-Jan-14	205,000																	
A	421	8-Apr-13	20-Oct-13	3499	24-Jan-14	21,103																	
A	425	8-Apr-13	10-Mar-14	3601	18-Mar-14	25,000																	
A	425	8-Apr-13	10-Mar-14	3602	27-Mar-14	200,000																	
A	425	8-Apr-13	10-Mar-14	3759	24-Jun-14	2,665,710																	
A	427	8-Apr-13	31-Jul-13	3466	3-Jan-14	192,085																	
A	428	8-Apr-13	16-Dec-13	3496	23-Jan-14	900,000																	
A	428	8-Apr-13	16-Dec-13	3496	23-Jan-14	328,000																	
A	428	8-Apr-13	16-Dec-13	3531	1-Mar-14	900,000																	
A	428	8-Apr-13	16-Dec-13	3532	1-Mar-14	200,000																	
A	428	8-Apr-13	16-Dec-13	3533	1-Mar-14	127,000																	
A	428	8-Apr-13	16-Dec-13	3719	10-May-14	50,000																	
A	428	8-Apr-13	16-Dec-13	3720	10-May-14	55,903																	
A	428	8-Apr-13	16-Dec-13	3721	10-May-14	100,000																	
A	431	8-Apr-13	24-Feb-12	3566	14-Mar-14	216,535																	
A	503	8-Apr-13	23-Oct-14	3836	28-Oct-14	25,000																	
A	503	8-Apr-13	23-Oct-14	3838	1-Nov-14	200,000																	
A	503	8-Apr-13	23-Oct-14	3852	21-Nov-14	216,000																	
A	503	8-Apr-13	23-Oct-14	3874	5-Jan-15	2,467,992																	
A	503	8-Apr-13	23-Oct-14	3897	31-Jan-15	192,000																	
A	508	8-Apr-13	16-Oct-13	3479	9-Jan-14	1,900,000																	
A	508	8-Apr-13	16-Oct-13	3520	18-Feb-14	216,518																	
A	512	8-Apr-13	9-Aug-13	3516	7-Feb-14	200,000																	
A	512	8-Apr-13	9-Aug-13	3527	1-Mar-14	3,170																	
A	512	8-Apr-13	31-Oct-14	3839	1-Nov-14	25,000																	
A	513	8-Apr-13	31-Oct-14	3859	1-Dec-14	200,000																	
A	513	8-Apr-13	31-Oct-14	3869	29-Dec-14	294,000																	

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Block No.	FTR No.	OC Date	Booking Date	Receipt No.	Receipt Date	Recipient Amount	Towards Sale Deed		Towards Agreement of		Construction		Towards VAT and		Registration Charges		Towards Other Taxable		Towards Other Non-		Bookings After OC (Y=0,		No=1)		Receipts towards Agreements		of Construction for flats		booked before completion		Tax rate under works		Contract with composition		Estimated Tax Liability	
							Towards Sale Deed	Towards Agreement of	Construction	Towards VAT and	Registration Charges	Towards Other Taxable	Towards Other Non-	Bookings After OC (Y=0,	No=1)	Receipts towards Agreements	of Construction for flats	booked before completion	Tax rate under works	Contract with composition	Estimated Tax Liability	Based on OC	Estimated Tax Liability	Based on OC	Estimated Tax Liability	Based on OC	Receipts towards Agreements	of Construction for flats	booked before completion	Tax rate under works	Contract with composition	Estimated Tax Liability				
A	513	8-Apr-13	31-Oct-14	3876	9-Jan-15	122,000																														
A	513	8-Apr-13	31-Oct-14	3878	13-Jan-15	2,100,000	2,100,000																							4.944						
A	513	8-Apr-13	31-Oct-14	3912	6-Mar-15	183,000		183,000																					4.944							
A	513	8-Apr-13	31-Oct-14	3913	9-Mar-15	200,000		17,000																				4.944								
A	517	8-Apr-13	30-Jun-14	3781	7-Jul-14	50,000		50,000																				4.944								
A	517	8-Apr-13	30-Jun-14	3793	26-Jul-14	200,000		200,000																				4.944								
A	517	8-Apr-13	30-Jun-14	3797	31-Jul-14	280,000		280,000																			4.944									
A	517	8-Apr-13	30-Jun-14	3800	12-Aug-14	500,000		500,000																			4.944									
A	517	8-Apr-13	30-Jun-14	3895	7-Feb-15	1,481,379		1,481,379																			4.944									
A	524	8-Apr-13	16-Oct-13	3552	6-Mar-14	50,000		50,000																			4.944									
A	524	8-Apr-13	16-Oct-13	3553	6-Mar-14	58		58																			4.944									
A	526	8-Apr-13	31-Dec-13	3746	4-Jan-14	25,000		25,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3502	27-Jan-14	1,000,000		1,000,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3503	27-Jan-14	500,000		500,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3513	3-Feb-14	1,000,000		1,000,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3545	4-Mar-14	1,100,000		23,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3572	21-Mar-14	178,000		178,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3573	21-Mar-14	45,601		18,000																			4.944									
A	526	8-Apr-13	31-Dec-13	3718	8-May-14	4,399		-																			4.944									
A	527	8-Apr-13	28-Feb-14	3547	4-Mar-14	25,000		25,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3569	19-Mar-14	200,000		200,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3605	4-Apr-14	399,000		399,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3788	25-Jul-14	624,000		624,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3789	25-Jul-14	200,000		200,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3792	26-Jul-14	50,000		50,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3794	30-Jul-14	250,000		250,000																			4.944									
A	527	8-Apr-13	28-Feb-14	3804	21-Aug-14	49,850		49,850																			4.944									
A	527	8-Apr-13	28-Feb-14	3807	25-Aug-14	2,240,000		2,190,150																			4.944									
A	527	8-Apr-13	28-Feb-14	3848	17-Nov-14	5,275		-																			4.944									
A	528	8-Apr-13	12-Aug-14	3811	28-Aug-14	500,000		500,000																			4.944									
A	528	8-Apr-13	12-Aug-14	3812	28-Aug-14	500,000		500,000																			4.944									

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OC Date	Receipt No	Booking Date	Receipt Amount	Towards Sale Deed	
				Towards Agreements	Construction
A 528 8-Apr-13	12-Aug-14	3813	28-Aug-14	500,000	500,000
A 528 8-Apr-13	12-Aug-14	3814	28-Aug-14	500,000	500,000
A 528 8-Apr-13	12-Aug-14	3815	28-Aug-14	620,000	620,000
A 529 8-Apr-13	15-Nov-13	3534	5-May-14	2,457,500	2,457,500
A 529 8-Apr-13	15-Nov-13	3750	10-Jun-14	196,459	196,459
A 531 8-Apr-13	29-Mar-12	3561	11-Mar-14	100,000	-
A 533 8-Apr-13	23-Apr-14	3708	24-Apr-14	25,000	25,000
A 533 8-Apr-13	23-Apr-14	3715	3-May-14	200,000	200,000
A 533 8-Apr-13	23-Apr-14	3724	15-May-14	295,000	295,000
A 533 8-Apr-13	23-Apr-14	3730	22-May-14	269,125	269,125
A 533 8-Apr-13	23-Apr-14	3732	24-May-14	2,738,538	2,738,538
A 533 8-Apr-13	23-Apr-14	3802	14-Aug-14	391,462	122,337
A 533 8-Apr-13	23-Apr-14	3879	13-Jan-15	10,485	-
B 105 13-Mar-14	31-Jan-15	25000	30-Jan-15	25,000	25,000
B 105 13-Mar-14	31-Jan-15	3903	3-Feb-15	200,000	200,000
B 105 13-Mar-14	31-Jan-15	3904	9-Feb-15	86,000	86,000
B 105 13-Mar-14	31-Jan-15	3905	20-Feb-15	154,000	154,000
B 1201 13-Mar-14	26-Jan-14	3507	4-Feb-14	25,000	25,000
B 1201 13-Mar-14	26-Jan-14	3523	19-Feb-14	100,000	100,000
B 1201 13-Mar-14	26-Jan-14	3524	19-Feb-14	100,000	100,000
B 201 13-Mar-14	26-Jan-14	3557	11-Mar-14	50,000	50,000
B 201 13-Mar-14	26-Jan-14	3558	11-Mar-14	100,000	100,000
B 201 13-Mar-14	26-Jan-14	3559	11-Mar-14	100,000	100,000
B 201 13-Mar-14	26-Jan-14	3560	11-Mar-14	38,000	38,000
B 201 13-Mar-14	26-Jan-14	3575	25-Mar-14	1,625,000	1,625,000
B 201 13-Mar-14	26-Jan-14	3727	20-May-14	542,000	542,000
B 201 13-Mar-14	26-Jan-14	3760	1-Jul-14	175,875	175,875
B 201 13-Mar-14	26-Jan-14	3761	1-Jul-14	27,088	24,125
B 202 13-Mar-14	26-Jan-14	3506	4-Feb-14	25,000	25,000
B 202 13-Mar-14	26-Jan-14	3521	19-Feb-14	100,000	100,000
B 202 13-Mar-14	26-Jan-14	3522	19-Feb-14	100,000	100,000

Estimated Tax Liability

Estimated Tax Liability
based on OCTax rate under works
contract with compositionReceipts towards agreements
of construction for flatsBookings after OC (Yes=0,
No=1)

Towards Other Non-

Taxes VAT and

Receipts

Towards Other Taxable

Registration Charges

Towards VAT and

Towards Sale Deed

Receipts

Towards Agreements

Construction

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Block No	Filar No	OC Date	Booking Date	Receipt No	Receipt Date	Receipt Amount	Towards Sale Deed		Towards Agreement of		Towards VAT and Registration Charges		Towards Other Non-Taxable Receipts		Registration of Construction		Towards VAT and Registration Charges		Towards Other Non-Taxable Receipts		Bookings after OC (Y=0, N=1)		Receipits towards Agreements of Construction for flats		Receipits towards Agreements of Construction before completion		Tax rate under works		Estimated Tax Liability based on OC		Estimated Tax Liability	
							Contract with composition	Rate under works	of construction for flats	before completion	before completion	of construction for flats	before completion	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability	Estimated Tax Liability			
B	202	13-Mar-14	26-Jan-14	3554	7-Mar-14	100,000	100,000																									
B	202	13-Mar-14	26-Jan-14	3555	7-Mar-14	100,000	100,000																					4.944				
B	202	13-Mar-14	26-Jan-14	3556	7-Mar-14	80,000	80,000																					4.944				
B	202	13-Mar-14	26-Jan-14	3580	27-Mar-14	1,338,000	1,338,000																					4.944				
B	202	13-Mar-14	26-Jan-14	3740	29-May-14	239,000	239,000																					4.944				
B	202	13-Mar-14	26-Jan-14	3741	29-May-14	526,000	526,000																					4.944				
B	202	13-Mar-14	26-Jan-14	3762	1-Jul-14	251,103	251,103																					26,005				
B	204	13-Mar-14	16-Mar-15	3629	12-Mar-15	25,000	25,000																					9,888				
B	204	13-Mar-14	16-Mar-15	3921	31-Mar-15	200,000	200,000																					0				
B	205	13-Mar-14	28-Feb-14	3563	14-Mar-14	25,000	25,000																					4.944				
B	205	13-Mar-14	28-Feb-14	3564	14-Mar-14	200,000	200,000																					4.944				
B	205	13-Mar-14	28-Feb-14	3578	27-Mar-14	218,725	218,725																					4.944				
B	205	13-Mar-14	28-Feb-14	3593	3-Apr-14	2,775,000	2,775,000																					4.944				
B	205	13-Mar-14	28-Feb-14	3705	18-Apr-14	800	800																					4.944				
B	206	13-Mar-14	24-Feb-14	3528	4-Mar-14	25,000	25,000																					4.944				
B	206	13-Mar-14	24-Feb-14	3571	20-Mar-14	400,000	400,000																					4.944				
B	206	13-Mar-14	24-Feb-14	3834	17-Oct-14	1,930,448	1,930,448																					4.944				
B	206	13-Mar-14	24-Feb-14	3849	20-Nov-14	199,552	199,552																					4.944				
B	301	13-Mar-14	26-Jan-14	3487	28-Jan-14	25,000	25,000																					4.944				
B	301	13-Mar-14	26-Jan-14	3518	11-Feb-14	200,000	200,000																					4.944				
B	301	13-Mar-14	26-Jan-14	3769	1-Jul-14	115,000	115,000																					4.944				
B	301	13-Mar-14	26-Jan-14	3786	21-Jul-14	54,835	47,000																				4.944					
B	301	13-Mar-14	12-May-14	3702	11-Apr-14	1,625,000	1,625,000																				79					
B	301	13-Mar-14	12-May-14	3743	28-May-14	580,000	580,000																				4.944					
B	301	13-Mar-14	12-May-14	3769	1-Jul-14	115,000	115,000																				4.944					
B	301	13-Mar-14	26-Jan-14	3786	21-Jul-14	54,835	47,000																				4.944					
B	302	13-Mar-14	12-May-14	3611	10-May-14	25,000	25,000																				4.944					
B	302	13-Mar-14	12-May-14	3738	160,000	160,000	160,000																				4.944					
B	302	13-Mar-14	12-May-14	3739	24-Dec-14	2,539,184	2,539,184																				4.944					
B	303	13-Mar-14	30-Jun-13	3538	24-Feb-14	103,900	103,900																				4.944					
B	303	13-Mar-14	30-Jun-13	3706	19-Apr-14	988	988																				4.944					

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OC Date	Book Date	Receipt No	Receipt Amount	Towards Sale Deed		Towards Agreements of Construction	Towards Other Taxable Receipts	Towards VAT and Registration Charges	Towards Other Non- Taxable Receipts	Bookings After OC (Yes=0, No=1)	Receipts towards Agreements of Construction for flats booked before completion Tax rate under works Contract with composition Estimated Tax Liability based on OC
				Towards Sale Deed	Towards Agreements of Construction						
B 304 13-Mar-14 24-Feb-14 3529 4-Mar-14 25,000 25,000											
B 304 13-Mar-14 24-Feb-14 3562 12-Mar-14 200,000 200,000											
B 304 13-Mar-14 24-Feb-14 3843 10-Nov-14 1,888,000 1,888,000											
B 305 13-Mar-14 8-Aug-13 3858 1-Dec-14 500,000 500,000											
B 306 13-Mar-14 16-Jan-12 3478 8-Jan-14 106,075 106,075											
B 401 13-Mar-14 2-Dec-14 3623 5-Dec-14 25,000 25,000											
B 401 13-Mar-14 2-Dec-14 3864 19-Dec-14 200,000 200,000											
B 401 13-Mar-14 2-Dec-14 3873 3-Jan-15 300,000 300,000											
B 401 13-Mar-14 2-Dec-14 3888 27-Jan-15 500,000 500,000											
B 401 13-Mar-14 2-Dec-14 3889 27-Jan-15 500,000 500,000											
B 401 13-Mar-14 2-Dec-14 3890 27-Jan-15 500,000 500,000											
B 402 13-Mar-14 1-Dec-14 3622 5-Dec-14 25,000 25,000											
B 402 13-Mar-14 1-Dec-14 3625 30-Dec-14 200,000 200,000											
B 402 13-Mar-14 1-Dec-14 3626 13-Jan-15 200,000 200,000											
B 402 13-Mar-14 1-Dec-14 3891 28-Jan-15 2,715,000 2,715,000											
B 404 13-Mar-14 31-Dec-14 3872 31-Dec-14 25,000 25,000											
B 404 13-Mar-14 31-Dec-14 3884 19-Jan-15 200,000 200,000											
B 404 13-Mar-14 31-Dec-14 3899 9-Feb-15 200,000 200,000											
B 404 13-Mar-14 31-Dec-14 3900 9-Feb-15 129,820 129,820											
B 404 13-Mar-14 31-Dec-14 3917 24-Mar-15 2,550,000 2,417,180											
B 405 13-Mar-14 28-Feb-14 3551 26-Feb-14 25,000 25,000											
B 405 13-Mar-14 28-Feb-14 3856 29-Mar-14 200,000 200,000											
B 405 13-Mar-14 28-Feb-14 3717 7-May-14 298,000 298,000											
B 405 13-Mar-14 28-Feb-14 3729 21-May-14 65,000 65,000											
B 405 13-Mar-14 28-Feb-14 3751 10-Jun-14 2,000,000 2,000,000											
B 405 13-Mar-14 28-Feb-14 3810 22-Aug-14 47,350 47,350											
B 405 13-Mar-14 28-Feb-14 3839 12-Sep-14 390,000 352,650											
B 406 13-Mar-14 24-Aug-12 3574 24-Mar-14 200,000 129,000											
B 501 13-Mar-14 19-Apr-14 7E+05 22-Apr-14 225,000 225,000											
B 501 13-Mar-14 19-Apr-14 3722 10-May-14 1,258,000 1,258,000											
B 501 13-Mar-14 19-Apr-14 3754 14-Jun-14 1,258,000 1,258,000											

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Block No	Fitter No	OC Date	Booking Date	Receipt No	Receipt Amount	Towards Sale Deed		Towards Other Taxable		Registration Charges		Towards VAT and		Bookings After OC (Yes=0,		Bookings After OC (No=1)		Receipts Under Works		Rate Under Works		Contract With Composition		Estimated Tax Liability					
						Towards Construction	Towards Agreements	Towards Other Non-Taxable	Taxable Receipts	Towards Sale Deed	Towards Other Taxable	Registration Charges	Towards VAT and	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts	Receipts
B	301	13-Mar-14	19-Apr-14	3801	8-Aug-14	200,000	200,000	-	-	34,728	182,995	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
B	301	13-Mar-14	19-Apr-14	3809	26-Aug-14	217,723	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B	302	13-Mar-14	31-Dec-14	-	6-Jan-15	25,000	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,717
B	302	13-Mar-14	31-Dec-14	3882	24-Jan-15	200,000	200,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	302	13-Mar-14	31-Dec-14	3894	30-Jan-15	289,000	289,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	302	13-Mar-14	31-Dec-14	3896	16-Feb-15	1,000,000	1,000,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944	
B	302	13-Mar-14	31-Dec-14	3914	12-Mar-15	600,000	600,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	302	13-Mar-14	31-Dec-14	3916	24-Mar-15	500,000	500,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	304	13-Mar-14	31-Dec-14	3871	27-Dec-14	25,000	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	304	13-Mar-14	31-Dec-14	3880	14-Jan-15	200,000	200,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	304	13-Mar-14	31-Dec-14	3901	10-Feb-15	329,820	329,820	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
B	304	13-Mar-14	31-Dec-14	3915	14-Mar-15	2,550,000	2,417,180	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3613	19-May-14	25,000	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3728	14-Jun-14	200,000	200,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3753	14-Jun-14	288,000	288,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3767	30-Jun-14	500,000	500,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3768	1-Jul-14	361,306	361,306	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3770	1-Jul-14	50,000	50,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3772	1-Jul-14	115,694	115,694	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3773	1-Jul-14	598,000	598,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3787	23-Jul-14	207,500	207,500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944
C	107	4-Nov-11	15-May-14	3790	26-Jul-14	662,000	454,500	-	-	25,818	181,682	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,276	
C	107	4-Nov-11	15-May-14	3818	4-Sep-14	25,918	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,532
C	118	4-Nov-11	23-Sep-11	3799	8-Aug-14	105,559	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,225	
C	123	4-Nov-11	15-Oct-2008	3898	7-Feb-15	51,207	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,582	
C	407	4-Nov-11	16-Mar-15	3549	25-Feb-14	45,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944	
C	407	4-Nov-11	16-Mar-15	3550	26-Feb-14	32,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944	
C	407	4-Nov-11	16-Mar-15	3628	6-Mar-15	25,000	25,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944	
C	411	4-Nov-11	21-Oct-2007	3758	24-Jun-14	161,750	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,944	
				144,585,486	135,190,266	3,987,512	251,919	4,825,674	330,115	1,285,378	63,549	209,597																	

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S No.	Block	Flat No.	Value of Sale Deed	Receipts Towards Sale Deed
1	A	102	3,126,000	-
2	A	103	3,126,000	3,091,785
3	A	104	3,988,000	727,136
4	A	105	3,003,000	3,003,000
5	A	110	3,821,000	2,560,650
6	A	113	2,880,000	2,880,000
7	A	114	2,548,000	2,548,000
8	A	118	3,738,000	313,000
9	A	123	1,372,000	-
10	A	125	2,911,000	2,407,729
11	A	127	3,988,000	-
12	A	128	2,880,000	2,880,000
13	A	129	2,880,000	2,380,000
14	A	133	3,738,000	494,495
15	A	134	2,880,000	2,880,000
16	A	209	3,126,000	2,924,700
17	A	210	1,372,000	-
18	A	214	3,174,000	-
19	A	228	2,880,000	2,880,000
20	A	229	3,003,000	3,003,000
21	A	233	3,988,000	3,929,534
22	A	234	2,230,000	2,230,000
23	A	309	2,880,000	2,880,000
24	A	317	3,126,000	3,071,183
25	A	320	3,126,000	3,126,000
26	A	325	1,372,000	2,948,103
27	A	334	2,941,000	2,941,000
28	A	417	2,880,000	2,880,000
29	A	421	2,880,000	2,620,618
30	A	425	3,065,000	2,890,710
31	A	427	3,738,000	-
32	A	428	2,880,000	2,655,000
33	A	431	2,548,000	-
34	A	503	2,941,000	2,941,000
35	A	508	2,880,000	2,116,518
36	A	512	2,126,000	41,000
37	A	513	2,941,000	2,941,000
38	A	517	2,880,000	2,511,379
39	A	524	2,880,000	50,058
40	A	526	2,548,000	2,548,000
41	A	527	3,988,000	3,988,000
42	A	528	2,620,000	2,620,000
43	A	529	2,880,000	2,653,959
44	A	531	1,372,000	-
45	A	533	3,650,000	3,650,000
46	B	105	3,065,000	465,000

Greenwood Estates Service Tax Details 18.03.16 Ver 116
Annexure A - Sale Deed Detail

SD
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S No.	Block	Flat No.	Value of Sale Deed	Receipts Towards Sale Deed
47	B	201	2,880,000	2,880,000
48	B	202	1,843,000	1,843,000
49	B	204	2,972,000	225,000
50	B	205	3,238,000	3,219,525
51	B	206	2,614,000	2,555,000
52	B	301	2,880,000	2,880,000
53	B	302	2,868,000	2,826,184
54	B	303	2,125,000	-
55	B	304	2,880,000	2,113,000
56	B	305	3,048,000	500,000
57	B	306	1,700,000	-
58	B	401	3,003,000	2,025,000
59	B	402	3,167,000	3,140,000
60	B	404	2,972,000	2,972,000
61	B	405	2,988,000	2,988,000
62	B	406	920,000	-
63	B	501	2,941,000	2,941,000
64	B	502	2,898,000	2,614,000
65	B	504	2,972,000	2,972,000
66	C	107	2,800,000	2,800,000
67	C	118	1,372,000	-
68	C	123	1,027,000	-
69	C	407	2,911,000	25,000
70	C	411	2,180,000	-
Total			196,058,000	135,190,266

Annexure B - Details of Receipts

S No	Block No	Flat No	Receipt Amount	Receipt towards Sale Deed		Agreement of Construction	Other Taxable Receipts	charges, Stamp duty, etc.	Total taxable receipts	Abatement @ 40%	Service tax receipts @ 12.36% for receipts	Receipts towards non- taxable receipts
				Receipt towards construction	Receipt like VAT, Reg							
1	A	102	203,875	-	-	-	-	203,875	-	-	-	-
2	A	103	3,091,785	3,091,785	-	-	-	-	-	-	-	-
3	A	104	825,546	727,136	-	-	-	98,410	-	-	-	-
4	A	105	3,225,000	3,003,000	-	1,600	220,400	-	1,600	640	79	-
5	A	110	2,560,650	2,560,650	-	-	-	-	-	-	-	-
6	A	113	2,903,000	2,880,000	-	22,218	782	-	22,218	8,887	1,098	-
7	A	114	4,007,950	2,548,000	1,273,000	-	-	186,950	1,273,000	509,200	62,937	-
8	A	118	666,813	313,000	-	35,158	318,655	-	35,158	14,063	1,738	-
9	A	123	68,794	-	-	-	-	68,794	-	-	-	-
10	A	125	2,407,729	2,407,729	-	-	-	-	-	-	-	-
11	A	127	363,673	-	58,697	-	-	304,976	58,697	23,479	2,902	-
12	A	128	3,075,381	2,880,000	-	-	-	195,381	-	-	-	-
13	A	129	2,380,000	2,380,000	-	-	-	-	-	-	-	-
14	A	133	770,000	494,495	-	40,099	235,406	-	40,099	16,040	1,982	-
15	A	134	3,093,300	2,880,000	-	-	-	213,300	-	-	-	-
16	A	209	2,924,700	2,924,700	-	-	-	-	-	-	-	-
17	A	210	22,020	-	-	-	-	22,020	-	-	-	-
18	A	214	32,961	-	-	-	-	32,961	-	-	-	-
19	A	228	2,880,000	2,880,000	-	-	-	-	-	-	-	-
20	A	229	3,103,000	3,003,000	-	24,219	75,781	-	24,219	9,688	1,197	-
21	A	233	3,929,534	3,929,534	-	-	-	-	-	-	-	-
22	A	234	2,369,000	2,230,000	-	23,260	115,740	23,260	9,304	1,150	-	-
23	A	309	2,911,593	2,880,000	-	21,718	9,875	21,718	8,687	1,074	-	-
24	A	317	3,071,183	3,071,183	-	-	-	-	-	-	-	-
25	A	320	3,182,135	3,126,000	25,000	-	31,135	25,000	10,000	1,236	-	-

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S No.	Block No	Flat No	Receipt Amount	Receipt towards Sale Deed		Agreement of Construction	Other Taxable charges, Stamp Receipts	Total taxable duty, etc.	Abatement @ 40%	Service tax receipts @ 12.36% for receipts	Receipts towards non- taxable receipts like VAT, Reg etc.
				Receipt towards construction	Stamp duty						
26	A	325	2,948,103	2,948,103	-	-	-	-	-	-	-
27	A	334	3,158,723	2,941,000	-	-	217,723	-	-	-	-
28	A	417	2,951,156	2,880,000	-	-	71,156	-	-	-	-
29	A	421	2,620,618	2,620,618	-	-	-	-	-	-	-
30	A	425	2,890,710	2,890,710	-	-	-	-	-	-	-
31	A	427	192,085	-	-	-	-	192,085	-	-	-
32	A	428	2,660,903	2,655,000	-	5,903	-	-	5,903	2,361	292
33	A	431	216,535	-	29,533	-	-	187,002	29,533	11,813	1,460
34	A	503	3,100,992	2,941,000	-	-	-	159,992	-	-	-
35	A	508	2,116,518	2,116,518	-	-	-	-	-	-	-
36	A	512	203,170	41,000	-	-	-	-	-	-	-
37	A	513	3,124,000	2,941,000	-	-	2,935	159,235	2,935	1,174	145
38	A	517	2,511,379	2,511,379	-	-	-	-	-	-	-
39	A	524	50,058	50,058	-	-	-	-	-	-	-
40	A	526	3,853,000	2,548,000	1,273,000	-	-	32,000	1,273,000	509,200	62,937
41	A	527	4,043,125	3,988,000	-	-	55,125	-	-	-	-
42	A	528	2,620,000	2,620,000	-	-	-	-	-	-	-
43	A	529	2,653,959	2,653,959	-	-	-	-	-	-	-
44	A	531	100,000	-	-	-	-	100,000	-	-	-
45	A	533	3,929,610	3,650,000	-	9,700	269,910	9,700	-	3,880	480
46	B	105	465,000	465,000	-	-	-	-	-	-	-
47	B	201	2,882,963	2,880,000	-	2,963	-	2,963	1,185	146	52
48	B	202	2,859,103	1,843,000	965,000	-	51,103	965,000	386,000	47,710	54
49	B	204	225,000	225,000	-	-	-	-	-	-	-
50	B	205	3,219,525	3,219,525	-	-	-	-	-	-	-

S No	Block No	Flat No	Receipt Amount	Receipt towards Sale Deed		Agreement of Construction	Other Taxable charges, Stamp duty, etc.	Receipt towards non- taxable receipts like VAT, Reg	Receipts towards Stamp duty, etc.	Total taxable receipts	Abatement @ 40%	Service tax @ 12.36% for receipts
				Receipt towards construction	Receipts							
51	B	206	2,555,000	2,555,000	-	-	-	1,600	6,235	1,600	640	79
52	B	301	2,887,835	2,880,000	-	-	-	-	-	-	-	-
53	B	302	2,826,184	2,826,184	-	-	-	-	-	-	-	-
54	B	303	104,888	-	-	-	-	-	104,888	-	-	-
55	B	304	2,113,000	2,113,000	-	-	-	-	-	-	-	-
56	B	305	500,000	500,000	-	-	-	-	-	-	-	-
57	B	306	106,075	-	106,075	-	-	-	-	106,075	42,430	5,244
58	B	401	2,025,000	2,025,000	-	-	-	-	-	-	-	-
59	B	402	3,140,000	3,140,000	-	-	-	-	-	-	-	-
60	B	404	3,104,820	2,972,000	-	-	-	-	132,820	-	-	-
61	B	405	3,025,350	2,988,000	-	-	-	-	37,350	-	-	-
62	B	406	200,000	-	129,000	-	-	-	71,000	129,000	51,600	6,378
63	B	501	3,158,723	2,941,000	-	34,728	-	182,995	34,728	13,891	1,717	-
64	B	502	2,614,000	2,614,000	-	-	-	-	-	-	-	-
65	B	504	3,104,820	2,972,000	-	-	-	132,820	-	-	-	-
66	C	107	3,033,418	2,800,000	-	25,818	-	207,600	25,818	10,327	1,276	-
67	C	118	105,559	-	-	-	-	105,559	-	-	-	-
68	C	123	51,207	-	51,207	-	-	-	51,207	20,483	2,532	-
69	C	407	102,000	25,000	77,000	-	-	-	77,000	30,800	3,807	-
70	C	411	161,750	-	-	-	-	161,750	-	-	-	-
		144,585,486	135,190,266	3,987,512	251,919	5,155,789	4,239,431	1,695,772	209,597			