



Unit-17/2021-22/132406  
**GOVERNMENT OF SINDH**  
**SINDH REVENUE BOARD**  
**Commissionerate-III**  
Karachi, dated May 14, 2022

**ORDER U/S 25 OF THE Sindh SALES TAX ON SERVICES ACT, 2011**

Whereas, **Mr. Adeel Ashraf** having SNTN:3422439 (herein after referred as ‘registered person’) is engaged in providing “Courier services” (tariff heading 9808.0000) of the Second Schedule to the Act, 2011, which are chargeable to Sindh sales tax @ 13% under section 8 of the Sindh Sales Tax on Services Act, 2011 (‘the Act’) read with section 3 and the Second Schedule thereof. Under section 15 of the Act, 2011, the registered persons are allowed to get input tax credit in respect of sales tax paid on purchases of goods or services used in providing taxable services subject to restrictions as envisaged in section 15A read with Rule 22 of the Rules, 2011. Furthermore, as per section 30 of the Act, 2011 read with rule 16 of the Rules, 2011, the registered person to file scanned attachment, as evidence, in respect of input tax claimed on goods used, consumed, or utilized for providing services exceeds 20% of output tax

2. According to aforesaid provisions of the Act, 2011 and per normal business practice, the sales values of services providers are required to be higher than the values of purchases used in such sales. However, it was revealed (from the monthly Sindh sales tax returns of the aforesaid registered person filed with SRB for the tax periods Jan 2016, Oct 2016, January 2017, Dec 2017, June 2018, December 2018, November 2020, May 2021, January 2022 ) that the aforesaid registered person had claimed input tax credits of Rs.2,663,762/- on account of purchases of Rs.20,398,076/- claimed against sales of Rs.7,466,088/-. Furthermore, as per section 30 of the Act, 2011 read with rule 16 of the Rules, 2011, the registered person the under reference purchases of registered person were related to goods and are exceeding from the 20% of output tax. Therefore, in view of the above provision of law, the registered person was required to attach the scanned copies of aforementioned purchase invoices but he had failed to do so and has violated the aforesaid provisions of the Act and rules.

3 The registered person was provided an opportunity (vide this office notice dated 25-03-2022) to visit this office on or before 2<sup>nd</sup> April, 2022 along with following documents/records sought under section 27(2) of the Act, 2011 in order to justify the admissibility of the under reference input tax adjustments and explain his position regarding violation of section 30 of the Act and rule 16 of the Rules, 2011. However, the registered failed to comply with aforesaid notice dated 25-3-2021. The aforesaid substantial evidences establish deliberate violation of provisions of section 15, 15A(1a) and section 27(2) of the Act, 2011 and Rule 22 of the Rules, 2011, and deliberate failure of the registered person to perform his statutory obligations. Therefore, the registered person was show-cause and provided an opportunity of being heard vide this notice dated 22-04-2022, to explain as to why his registration may not be suspended under section 25(1)(a)(ii) of the Act, 2011 (referred to as “Act, 2011”), read with rule 10 of the Rules, 2011 (refer to as “Rules, 2011”) for violation of section 9, 15, 15A, 27(2), 30 of the Act and rule 22 of the Rules, 2011. Hearing was fixed on 29<sup>th</sup> April, 2022 at 11:30 am in this office. However, the registered failed to appear and comply with aforesaid notice. The registered person was advised to make payment of the short paid Sindh sales tax dues on account of under

reference inadmissible input tax and provide relevant information/records sought under section 27(2) of the Act. Hearing was fixed on 10<sup>th</sup> May, 2022 at 11:30 am in this office. However, the registered neither deposited the aforesaid short paid SST dues nor submitted any justification thereof.


4. Now, this order is being issued to you under section 25(3) of the Act, 2011 read with Circular No.02 of 2013 and Rule 10(1) of the Rules, 2011 to the effect that the registration of **Mr. Adeel Ashraf** having SNTN:3422439, is hereby suspended with immediate effect. The registered person is advised to take following remedial actions by 20<sup>th</sup> May, 2022;

- a) to deposit short paid SST of Rs.2,663,762/- in respect of under reference inadmissible input tax claims, along with default surcharge under section 44(1) of the Act, 2011 for aforementioned tax periods and deposit the same in the Government of Sindh head of account B-02384 ---Sindh Sales Tax on Services.
- b) Provide copies of all sales invoices, income tax returns and bank statements for the under reference tax periods, and copies of sales tax returns filed with other sales tax authorities, if any.

5. This order of suspension is without prejudice to the penal action, prosecution and recovery as may be taken against the registered person in accordance with the provisions of the Act, 2011 and the relevant rules of Rules, 2011.

6. Copy of this order is also forwarded taxpayer's registered email ID <aaaenterprises10@gmail.com> in terms of section 75 of the Act, 2011 and the rule made thereunder.

**Mr. Adeel Ashraf**  
**M/s. AAA Courier Services/Enterprises,**  
(SNTN:3422439)  
Flat No.06, Ebrahim Manzil,  
Gondi Street, BLOCK R-C 12/86  
Bohra Pir Karachi.

  
**(Muhammad Yousuf Bukhari)**  
Assistant Commissioner-Unit-17

**Copy for Information to:**

1. The Commissioner-III, SRB.
2. The Project Manager, PRAL, SRB.
3. Deputy Commissioner (IT), SRB, for placing it on SRB website.
4. Office Copy
5. M/s. S.Iftikhar & Company, Saddar.

  
**(Muhammad Yousuf Bukhari)**  
Assistant Commissioner-17

