


F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

	<p>OFFICE OF THE PRINCIPAL COMMISSIONER OF CUSTOMS:</p> <p>CUSTOM HOUSE, MUNDRA PORT, KUTCH, GUJARAT-</p> <p>370421.</p> <p>PHONE:- 02838-271426/271423 FAX :02838- 271425</p> <p>ईमेल- adj-mundra@gov.in</p>
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DIN- 20251171MO0000115005**SHOW CAUSE NOTICE****WHEREAS IT APPEARS THAT-**

1. A case was booked and investigated by the DRI HQ against Shri Pranshu Goel, proprietor of M/s Shri Mahadev ji Exports (IEC-CPTPG4273F) for undervaluation in importation of cold rolled stainless steel coil. During the course of investigation, forensic examination of electronic devices of concerned proprietors/ related persons were conducted details as below:

TABLE-1

Sno	Record of Proceedings (ROP) dated	Devices Details	Remarks
1	18.04.2022(RUD 01)	Samsung make mobile phone	Resumed under Panchnama dated 21.09.2021(RUD 02)
2	19.04.2022 (RUD 01 A)	Redmi make mobile phone	Resumed under Panchnama dated 21.09.2021 (RUD 02)
3		Oppo make mobile phone	Voluntarily submitted by Shri Pranshu Goel vide letter dated 17.11.2022 (RUD 4)
4		HP ProBook Laptop	
5		Dell Latitude Laptop	

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6	16.05.2023 & 17.05.2023	Western Digital Internal Hard Disk	Resumed under Panchnama dated 16.11.2022 (RUD 05)
7	(RUD 03)	02 HP Pen drive 32/64 GB	
8		02 Sandisc Cruzer Blade Pendrive 32/16 GB	

The Forensic examination led to retrieval of various incriminating evidence (Genuine Invoices mentioning actual price) against M/s Shri Mahadev ji Exports (IEC-CPTPG4273F) & others, suggesting fabricated invoice-with suppressed value, being declared by the above firm before Indian Customs to evade appropriate Customs duty. Subsequently, a Show Cause Notice under Section 28(4) of the Customs Act 1962, bearing F.No. GEN/ADJ/COMM/526/2024-Adjn-O/o-Pr.Commr-Cus-Mundra dated 08.11.2024, was issued to M/s Shri Mahadev ji Exports (IEC-CPTPG4273F) & others, by Customs Port Mundra. **(RUD 5A)**

Further, among the retrieved invoices, DRI HQ also retrieved incriminating evidences {Genuine Invoices mentioning actual price of the imported goods i.e. cold rolled stainless Steel Coils (Ex Stock)} by firms, detailed as below:

Sno.	Name of the firm	Proprietor	Registered Address
1	M/s Sada Steel Impex (IEC-AYHPG1590N)	Shri Amit Gupta	A-30, First Floor Group Wazirpur Industial Area, New Delhi – 110052
2	M/s Jenni Enterprises (IEC CXKPK6240H)	Shri Dheeraj Kumar Rao	L.G.F, FLAT NO 5 A-252, Building - 191, Neelkanth Palace Sant Nagar, East of

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			Kailash, New Delhi, Delhi, 110065
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**UNDER-VALAUTION IN IMPORT BY M/S SADA STEEL IMPEX
AND M/S JENNI ENTERPRISES:**

**2. THE RETRIEVED GENUINE INVOICES IN R/O M/S SADA STEEL
IMPEX (IEC-AYHPG1590N):**

2.1. In respect of M/s Sada Steel Impex, genuine invoice bearing Serial No. TY2202V3812 dated 07.09.2022 issued to M/s Sada Steel Impex by a Chinese supplier M/s HK Pingan Imp and Exp Co Limited for supplying goods namely Cold Rolled Stainless Steel Coil (Ex Stock, Grade J-3), was retrieved (as discussed in para 1 supra) from forensic examination of mobile phone of Shri Pranshu Goel, proprietor of M/s Shri Mahadev ji Exports. The unit price found mentioned on the invoice for the above goods was USD 1.565 per KG.

2.2. On examination of Import Data, it was gathered that the consignment under above invoice was sold by M/s Sada Steel Impex to M/s Total Cargo Services under High Sea sale, which was cleared by M/s Total Cargo Services under Bill of Entry No. 2725688 dated 03.10.2022. However, on scrutiny of the documents uploaded by M/s Total Cargo Services with Indian Customs authorities, the unit price of the above invoice Serial No. TY2202V3812 dated 07.09.2022 issued by M/s HK Pingan Imp and Exp Co Limited to M/s Sada Steel Impex, was found to suppressed to @ USD 0.78 per Kg. Resultantly, the High-Sea-Sale invoice No. HSS/2022-23/023 dated 26.09.2022 issued by M/s Sada Steel Impex to M/s Total Cargo Services was also issued on this suppressed value. It is submitted that a separate investigation against M/s Total Cargo Service is being under process, for acts of omission and commission conducted by the said firm).

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2.3. Thus, it emerged that M/s Sada Steel Impex had been using sets of parallel Invoices, issued by Chinese suppliers, for suppressing the actual value of the goods. This parallel invoice is with same serial number and other details; but one is Genuine Invoice -with actual value, and other is Fabricated Invoice-with suppressed value. Further, both - retrieved invoices vis-à-vis invoices as declared before Indian Customs are appended below for better understanding.

TIK PINGAN IMP AND EXP CO., LIMITED				
Address: Room 331-332, building B, Yiwu Port, Yiwu, Zhejiang				
COMMERCIAL INVOICE				
TO MESSRS				
SADA STEEL IMPEX ADD.: 1/10526, GROUND FLOOR, MOHAN PARK, SHAHIDARA DELHI-110032 IEC NO.: AY1HPG1590N PAN: AY1HPG1590N GSTIN: 07AY1HPG1590N1Z3 CONTACT PERSON'S: MR. AMIT GUPTA MOB. NO.: +918287743847 EMAIL ID: sadasteel@yahoo.com			发票号码/Invoice No.: TY2202V3812	
			日期/Date: 7th.SEP 2022	
装船口岸/ From SHIEKOU PORT, CHINA			目的地/ To Mundra PORT, India	
付款方式/ Terms of payment: USD5000 ADVANCE in 3 days, balance against BL scan in 7 days.				
唛头 Marks	货品名称 Description of Goods	重量 Quantity(KG)	单价 Unit Price	总值 Amount
N/M	EX-Stock stainless steel Cold rolled coil grade J3		CIF Mundra India	
	0.17*720	4414	\$1.565	\$6,907.910
	0.17*720	4216	\$1.565	\$6,598.040
	0.17*605	4456	\$1.565	\$6,973.640
	0.17*605	4742	\$1.565	\$7,421.230
	0.17*605	4346	\$1.565	\$6,801.490
	0.17*620	4310	\$1.565	\$6,745.150
	0.17*620	26484		
			Total	\$41,447.460
			Deposit	\$5,000.000
			Balance	\$36,447.460
TOTAL AMOUNT: USD 36447.46				
SAY TOTAL AMOUNT: USD THIRTY SIX THOUSAND FOUR HUNDRED FORTY SEVEN POINT FORTY SIX USD ONLY				
BENEFICIARY : TIK PINGAN IMP AND EXP CO., LIMITED				
Account Number : NRA15702142010500027000				
BENEFICIARY ADDRESS: Room 331-332, building B, Yiwu Port, Yiwu, Zhejiang				
SWIFT : CZCNCN2XXXX				
Beneficiary BANK : ZHEJIANG CHOUZHOU COMMERCIAL BANK CO., LTD				
			For and on behalf of TIK PINGAN IMP AND EXP CO., LIMITED	
			Authorized Signature(s)	

Image above: Genuine retrieved Invoice of M/s Sada Steel Impex with Invoice No. TY2202V3812 Dated 07.09.2022

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HK PINGAN IMP AND EXP CO.,LIMITED				
Address: Room 331-332, building B, Yiwu Port, Yiwu, Zhejiang				
COMMERCIAL INVOICE				
ORIGINAL				
TO MESSRS:				
SADA STEEL IMPEX ADD.: 1/10526, GROUND FLOOR, MOHAN PARK, SHAH DARA DELHI-110032 IEC NO.: AYHPG1590N PAN: AYHPG1590N GSTIN: 07AYHPG1590N1Z3 CONTACT PERSON'S: MR. AMIT GUPTA MOB. NO.: +918287743847 EMAIL ID: sadasteel@yahoo.com			发票号码/Invoice No.: TY2202V3812 日期/Date: 7th.SEP 2022	
装船口岸/ From SHEKOU PORT,CHINA			目的地/ To Mundra PORT, India	
付款方式/ Terms of payment: USD 5000 /ADVANCE in 3 days, balance against BL scan in 7 days.				
唛头 Marks	货品名称 Description of Goods	重量 Quantity(KG)	单价 Unit Price	总值 Amount
N/M	EX-Stock stainless steel Cold rolled coil grade J3		CIF Mundra India	
	0.17*720	4414	\$0.780	\$3,442.920
	0.17*720	4216	\$0.780	\$3,288.480
	0.17*605	4456	\$0.780	\$3,475.680
	0.17*605	4742	\$0.780	\$3,698.760
	0.17*620	4346	\$0.780	\$3,389.880
	0.17*620	4310	\$0.780	\$3,361.800
		26484		
			Total	\$20,657.520
			Deposit	\$5,000.000
		Blance	\$15,657.520	
TOTAL AMOUNT: USD 15657.52				
SAY TOTAL AMOUNT: USD FIFTEEN THOUSAND SIX HUNDRED FIFTY SEVEN POINT FIFTY TWO USD ONLY				

BENEFICIARY : HK PINGAN IMP AND EXP CO.,LIMITED

Account Number : NRA15702142010500027000

BENEFICIARY ADDRESS: Room 331-332, building B, Yiwu Port, Yiwu, Zhejiang

SWIFT :CZCBCN2XXXX

Beneficiary BANK :ZHEJIANG CHOUZHOU COMMERCIAL BANK CO.,LTD

For and on behalf of
HK PINGAN IMP AND EXP CO., LIMITED


Authorized Signature(s)


Validity unknown

Digitally signed by Mukesh Grover
Date: 2022.10.01 18:23:28 IST
Reason: Secure Document
Location: India


Image Above: Invoice No. TY2202V3812 Dated 07.09.2022 of M/s Sada Steel Impex as declared before Indian Customs authorities by M/s Total Cargo Services under Bill of Entry No. 2725688 dated 03.10.2022

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HIGH SEA SALE INVOICE				(ORIGINAL FOR RECIPIENT)		
SADA STEEL IMPEX 1/10526, GROUND FLOOR, MOHAN PARK, SHAHDARA DELHI-110032 MOB. NO. +91 8287743847 GSTIN/UIN: 07AYHPG1590N1Z3 E-Mail : amitguptatinku@yahoo.com		Invoice No. HSS/2022-23/023		Dated 26-Sep-22		
Consignee (Ship to) TOTAL CARGO SERVICES FLAT NO 05, A 252, L.G.F, BUILDING NO 191, NEELKANTH PALACE SANT NAGAR EAST OF KAILASH NEW DELHI GSTIN/UIN : 07AASFT0850B1Z9 State Name : Delhi, Code : 07		Delivery Note		Mode/Terms of Payment		
Buyer (Bill to) TOTAL CARGO SERVICES FLAT NO 05, A 252, L.G.F, BUILDING NO 191, NEELKANTH PALACE SANT NAGAR EAST OF KAILASH NEW DELHI GSTIN/UIN : 07AASFT0850B1Z9 State Name : Delhi, Code : 07		Reference No. & Date.		Other References		
Buyer's Order No.		Dated		Dispatch Doc No.		
Dispatched through		Delivery Note Date		Destination HIGH SEA SALE		
Terms of Delivery						
Sl No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	STAINLESS STEEL COLD ROLLED COILS (7219)	72199090	26,484.00 KGS	63.970	KGS	16,94,181.480
	Less : ROUND OFF					(-)0.480
Total			26,484.00 KGS			₹ 16,94,181.000
Amount Chargeable (in words) INR Sixteen Lakh Ninety Four Thousand One Hundred Eighty One Only						
HSN/SAC						Taxable Value
Total						
Tax Amount (in words) : NIL						
Company's PAN : AYHPG1590N						
Declaration We declare that this invoice shows the actual price of the goods and that the particulars are true and correct.						
Company's Bank Details Bank Name : INDUSIND BANK LTD. A/c No. : 250009031983 Branch & IFS Code : LOK VIHAR, PITAMPURA & INDB0000371 for SADA STEEL IMPEX						
Digitally signed by Mukesh Grover Date: 2022.10.01 18:23:16 IST Reason: Secure Document Location: India						Authorized Signatory 

Validity unknown

This is a Computer Generated Invoice



High-Sea-Sale invoice No. HSS/2022-23/023 dated 26.09.2022 issued by M/s Sada Steel Impex to M/s Total Cargo Services (with 2% High Sea Charges & exchange Rate 1 USD = 80.4 INR); declared under Bill of Entry No. 2725688 dated 03.10.2022

2.4. On comparison of the above Invoice as shown before Indian Customs and Genuine Invoice retrieved during investigation by DRI, it was noticed that both the invoices have identical Name of Supplier, Name of Importer, Date of

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Invoice, Number of Invoice, Nature of Goods, Description of Goods in terms of dimensions and weight, Account Name and Address of Chinese supplier, Account No., Bank Code, Bank Name and Bank Address except the Unit Price, which was suppressed from USD 1.565 per Kg to USD 0.780 per Kg.

2.5 Thus, it appears that M/s Sada Steel Impex suppressed the value of imported goods by using forged invoices and further sold the same under High Sea agreement to M/s Total Cargo Services. Further, M/s Total Cargo Services filed the Customs declaration with under-valued High Sea Sale agreement and Invoices, which raises doubt of its connivance with M/s Sada Steel Impex in importing the impugned goods by under-valuing them.

2.6. On going through the above facts and evidences, the genuineness of the declared price of the impugned goods i.e. Cold Rolled Stainless Steel coils, imported directly by M/s Sada Steel Impex became also doubtful. This necessitates further investigation against all imports of cold rolled Stainless Steel (Ex Stock) made by M/s Sada Steel Impex.

3. THE RETRIEVED GENUINE INVOICES IN R/O M/S JENNI ENTERPRISES (IEC CXKPK6240H)

3.1. In respect of the firm M/s Jenni Enterprises, two genuine invoices were retrieved (as per discussion in para 1 supra). Both the invoices, bearing Serial No. 211008J02-2 dated 23.10.2021 and 211008J02-3 dated 10.11.2021, were issued by Chinese Suppliers M/s Leo Metals Limited, for the goods namely 'Cold Rolled Stainless Steel Coil Grade J3 (Ex Stock). The unit price of imported goods as mentioned in the above two invoices was USD 2 per KG.

3.2. However, on analysis of import data it was gathered that M/s Jenni Enterprises cleared above consignments under Bills of Entry No. 6424963 dated 26.11.2021 and 6474866 dated 30.11.2021, respectively, at **USD 0.75** per KG. Both the retrieved invoices vis-à-vis the invoices as declared before the Indian Customs authorities are appended below for better understanding.

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- I. Genuine Invoice Serial No. 211008J02-2 dated 23.10.2021 of Chinese Supplier M/s Leo Metals Limited for supplying goods namely Cold Rolled Stainless Steel Coil (Grade J-3, Ex Stock) to M/s Jenni Enterprises vis-à-vis Customs Invoice declared before Customs Authorities.

LEO METALS LIMITED

FLAT/RM 1502 EASEY COMMERCIAL BUILDING 253-261 HENNESSY ROAD WANCHAI HK

COMMERCIAL INVOICE

BUYER: JENNI ENTERPRISES Invoice No.: **211008J02-2**

L.G.F., FLAT NO.5 A-252, BUILDING-
191, NEELKANTH PALACE, SANT NAGAR, EAST OF KAI
LASH, NEW DELHI, DELHI - 110065
GST: 07CXXPK6240H1ZC
PAN: CXXPK6240H IEC: CXXPK6240H
EMAIL: JENNI2021DK@GMAIL.COM
TEL:9319101508

Date: **OCT.23.2021**

COMMODITY: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK
PRICE TERM: CIF MUNDRA, INDIA

MARKS & NOS	SIZE (MM)	QUANTITY (MTS)	UNIT PRICE (USD/MTS)	AMOUNT (USD)
N/M	0.26*550*C	37.761	2000	75522.00
	0.26*600*C	14.644	2000	29288.00
Total :		52.405	/	104,810.00
TOTAL SAY U.S DOLLAR ONE HUNDRED AND FOUR THOUSAND EIGHT HUNDRED AND AMOUNT: TEN ONLY.				

BANK INFORMATION
BENEFICIARY NAME: LEO METALS LIMITED
BANK NAME: BANK OF COMMUNICATIONS CO.,LTD. OFFSHORE BANKING UNIT
BANK ADDRESS: NO.188, YINCHENG ZHONG ROAD, SHANGHAI CHINA
SWIFT CODE: COMMCN3XOBU
BANK ACCOUNT NO.: OSA90000343828100

Image above: Genuine retrieved Invoice of M/s Jenni Enterprises with Invoice No. 211008J02-2 dated 23.10.2021

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CUSTOMS INVOICE

LEO METALS LIMITED

FLAT/RM 1502 EASEY COMMERCIAL BUILDING 253-261 HENNESSY ROAD WANCHAI HK

COMMERCIAL INVOICE

BUYER: JENNI ENTERPRISES

Invoice No.: 211008J02-2

L.G.F., FLAT NO.5 A-252, BUILDING-
191, NEELKANTH PALACE, SANT NAGAR, EAST OF KAI
LASH, NEW DELHI, DELHI- 110065
GST: 07CXXPK6240H1ZC
PAN: CXXPK6240H IEC: CXXPK6240H
EMAIL: JENNI2021DK@GMAIL.COM
TEL: 9319101508

Date: OCT.23.2021

COMMODITY: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK
PRICE TERM: CIF MUNDRA INDIA

MARKS & NOS	SIZE (MM)	QUANTITY (MTS)	UNIT PRICE (USD/MTS)	AMOUNT (USD)
N/M	0.26*550*C	37.761	750	28,320.75
	0.26*600*C	14.644	750	10,983.00
	Total:	52.405	/	39,303.75
TOTAL AMOUNT:	SAY U.S DOLLAR THIRTY NINE THOUSAND THREE HUNDRED THREE AND CENTS. SEVENTY FIVE ONLY.			

BANK INFORMATION

BENEFICIARY NAME: LEO METALS LIMITED

BANK NAME: BANK OF COMMUNICATIONS CO., LTD. OFFSHORE BANKING UNIT

BANK ADDRESS: NO. 188, YINCHENG ZHONG ROAD, SHANGHAI CHINA

SWIFT CODE: COMMCN3XOBU

BANK ACCOUNT NO.: OSA90000343828100

For and on behalf of
Leo Metals Limited
麗寶金屬有限公司

[Signature]
Authorized Signature(s)

Image Above: Invoice as declared before Indian Customs authorities bearing No. 211008J02-2 dated 23.10.2021 of M/s Jenni Enterprises cleared under Bill of Entry No. Entry No. 6424963 dated 26.11.2021

On comparison of the above Invoice as declared before Indian Customs authorities and genuine Invoice retrieved during the investigation by DRI, it was noticed that both the invoices have identical Name of Supplier, Name of Importer, Date of Invoice, Number of Invoice, Nature of Goods, Description of Goods in terms of dimensions and weight, Account Name and Address of Chinese supplier, Account No., Bank Code, Bank Name and Bank Address except the Unit Price, which was suppressed from USD 2 per Kg to USD 0.750 per Kg.

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- II. Genuine Invoice Serial No. 211008J02-3 dated 10.11.2021 of Chinese Supplier M/s Leo Metals Limited for supplying goods namely Cold Rolled Stainless Steel Coil (Grade J-3, Ex Stock) to M/s Jenni Enterprises vis-à-vis Customs Invoice declared before Customs Authorities.

LEO METALS LIMITED

FLAT/RM 1502 EASEY COMMERCIAL BUILDING 253-261 HENNESSY ROAD WANCHAI HK

COMMERCIAL INVOICE

BUYER: JENNI ENTERPRISES

Invoice No.: 211008J02-3

L.G.F., FLAT NO.5 A-252, BUILDING-
191, NEELKANTH PALACE, SANT NAGAR, EAST OF KAI
LASH, NEW DELHI, DELHI - 110065
GST: 07CXKPK6240H1ZC
PAN: CXKPK6240H IEC: CXKPK6240H
EMAIL: JENNI2021DK@GMAIL.COM
TEL:9319101508

Date: NOV.10.2021

COMMODITY: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK
PRICE TERM: CIF MUNDRA, INDIA

MARKS& NOS	SIZE (MM)	QUANTITY (MTS)	UNIT PRICE (USD/MTS)	AMOUNT (USD)
N/M	0.26*550*C	29.991	2000	59982.00
	0.26*620*C	25.272	2000	50544.00
	Total :	55.263	/	110,526.00
TOTAL SAY U.S DOLLAR ONE HUNDRED AND TEN THOUSAND FIVE HUNDRED AND AMOUNT: TWENTY SIX ONLY.				

BANK INFORMATION

BENEFICIARY NAME: LEO METALS LIMITED
BANK NAME: BANK OF COMMUNICATIONS CO.,LTD. OFFSHORE BANKING UNIT
BANK ADDRESS:NO.188, YINCHENG ZHONG ROAD, SHANGHAI CHINA
SWIFT CODE: COMMCN3XOBU
BANK ACCOUNT NO.: OSA90000343828100

Image above: Genuine retrieved Invoice of M/s Jenni Enterprises with Invoice No.
211008J02-3 dated 10.11.2021

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CUSTOM INVOICE

LEO METALS LIMITED

FLAT/RM 1502 EASEY COMMERCIAL BUILDING 253-261 HENNESSY ROAD WANCHAI HK

COMMERCIAL INVOICE

BUYER: JENNI ENTERPRISES

Invoice No.: **211008J02-3**

L.G.F., FLAT NO.5 A-252, BUILDING-
191, NEELKANTH PALACE, SANT NAGAR, EAST OF KAI
LASH, NEW DELHI, DELHI - 110065
GST: 07CXKPK6240H1ZC
PAN: CXKPK6240H IEC: CXKPK6240H
EMAIL: JENNI2021DK@GMAIL.COM
TEL:9319101508

Date: **NOV.10.2021**

COMMODITY: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK
PRICE TERM: CIF MUNDRA, INDIA

MARKS & NOS	SIZE (MM)	QUANTITY (MTS)	UNIT PRICE (USD/MTS)	AMOUNT (USD)
N/M	0.26*550*C	29.991	750	22493.25
	0.26*620*C	25.272	750	18954.00
	Total :	55.263	/	41,447.25
TOTAL SAY U.S DOLLAR FORTY ONE THOUSAND FOUR HUNDRED FORTY SEVEN AND AMOUNT: CENTS TWENTY FIVE ONLY.				

BANK INFORMATION

BENEFICIARY NAME: LEO METALS LIMITED

BANK NAME: BANK OF COMMUNICATIONS CO., LTD. OFFSHORE BANKING UNIT

BANK ADDRESS: NO. 188, YINCHENG ZHONG ROAD, SHANGHAI, CHINA

SWIFT CODE: COMMCN3XOBU

BANK ACCOUNT NO.: OSA90000343828100

Leo Metals Limited

麗寶金屬有限公司

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Authorized Signature(s)

Image Above: Invoice as declared before Indian Customs authorities No. 211008J02-3 dated 10.11.2021 of M/s Jenni Enterprises cleared under Bill of Entry No. Entry No. 6474866 dated 30.11.2021

3.3. On comparison of the above Invoice as declared before Indian Customs authorities and genuine Invoice retrieved during the investigation, it was noticed that both the invoices have identical Name of Supplier, Name of Importer, Date of Invoice, Number of Invoice, Nature of Goods, Description of Goods in terms of dimensions and weight, Account Name and Address of Chinese supplier, Account No., Bank Code, Bank Name and Bank Address

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except the Unit Price, which was suppressed from USD 2 per Kg to USD 0.750 per Kg.

3.4 Thus, it appears that M/s Jenni Enterprises was suppressing the value of imported goods by using forged invoices to pay lesser Customs duties.

4. DETAILS OF SEARCHES CONDUCTED:

4.1 In view of above preliminary findings, detailed investigation was initiated against M/s Sada Steel Impex and M/s Jenni Enterprises. Accordingly, following searches were conducted in the matter:

Table-2

S. N.o	Address of Premise	Name of Person/Name of Firm associated	Panchnama /Incident Report Dated
1	LGF Flat No. 05, A-252, Building No. 191, Neel Kanth Palace, Sant Nagar, East of Kailash, North East Delhi-South Delhi-110065	Office premises of M/s Jenni Enterprises	15.12.2023 (RUD 06)
2	A-30 First Floor Group Wazirpur Industrial Area, New Delhi - 110052	Office premises of M/s Sada Steel Impex	16.12.2023/ 17.12.2023 (RUD 07) (Goods lying at the premises were seized under Section 110 of Customs Act (SCN bearing F.No CUS/APR/SCN/1659/2024-Gr 4-O/o Pr Commr-Cus-Mundra dated 13.12.2024, under Section 124, after seizure of the goods has been issued by concerned Port)
3	4/6, D B Gupta Road, Paharganj Central Delhi, 110055	Shri Mukesh Grover Proprietor of CHA firm M/s Mukesh Grover	15.12.2023 (RUD 08)

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4	318, Tarun Enclave, Saraswati Vihar, Pitampura, Northwest Delhi, 110034	Shri Atul Kishore Guglani, Partner in M/s Choice Cargo Agency Pvt Ltd	15.12.2023 (RUD 09)
5	D-71, Flat No. 101, First Floor Vishwakarma Colony, Delhi	Shri Atul Kishore Guglani, Partner in M/s Choice Cargo Agency Pvt Ltd	15.12.2023 (RUD 10)

5. DETENTION AND SEIZURE DETAILS:

During the search conducted in the matter, goods lying in the premises of M/s Sada Steel Impex situated at A-30. First Floor Group Wazirpur Industrial Area, New Delhi - 110052 were detained and later seized under Section 110 (1) of the Customs Act 1962, on the reasonable belief that these goods were improperly imported by way of mis-declaration & undervaluation and hence were liable for confiscation under Sec 111 of Customs Act 1962 read with Section 120 of Customs Act 1962, in case of them being used in manufacturing of finished goods. Further, a SCN under F.No. CUS/APR/SCN/1659/2024-Gr 4-O/o Pr Commr-Cus-Mundra dated 13.12.2024, under Section 124 of the Customs Act 1962, has been issued by Competent Authority at Customs port at Mundra **(RUD 11)**.

6. SUMMONS ISSUED UNDER SECTION 108 OF THE CUSTOMS ACT 1962:

6.1 To investigate the matter further, Sh. Amit Gupta, Proprietor of M/s Sada Steel Impex, was summoned on 15.12.2023, 01.02.2024, 18.04.2024, 02.09.2024, 23.12.2024 & 01.08.2025 **(RUD No 12)** to join investigation, but Shri Amit Gupta has never attended the investigation till date.

Similarly, Shri Dheeraj Kumar Rao, Proprietor of M/s Jenni Enterprises was also summoned on 22.02.2024, 10.04.2024, 23.04.2024, 02.09.2024 and 23.12.2024, to join investigation, but Shri Dheeraj Kumar Rao never responded and never attended the investigation till date. **(RUD- 13)**

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6.2 Therefore, for this non-compliance of the summons, a complaint for offences punishable under section 174 of the Indian Penal Code has been filed in Court of Law at Patiala House Court, New Delhi, against Sh. Amit Gupta, Proprietor of M/s Sada Steel Impex and Shri Dheeraj Kumar Rao, Proprietor of M/s Jenni Enterprises. The matter is sub Judice.

7. VOLUNTARY STATEMENTS RECORDED UNDER SECTION 108 OF THE CUSTOMS ACT 1962:

During the course of investigation, statements of following persons were recorded under section 108 of the customs act 1962, substantiating under-valuation in imports made by M/s Sada Steel Impex and M/s Jenni Enterprises:

TABLE-3

S. No	Name of person (Shri/Ms./Smt)	Relationship	Date of Statement	RUDs No
1	Arjun Guglani, Partner M/s Total Cargo Service	He purchased goods on High Sea sales basis from M/s Sada Steel Impex and had filed the Bill of Entry before Indian Customs	08.01.2024, 30.05.2024 & 06.10.2025	RUD - 14,15 &16
2	Mukesh Grover (CHA, F-Card Holder) (R-13/2006) Prop. of M/s Mukesh Grover	He, as CHA, filed all documents and cleared consignments of M/s Sada Steel and M/s Jenni Enterprises before Indian Customs.	20.12.2023, 21.12.2023 and 03.01.2025	RUD - 17,18 &19
3	Sh. Atul Kishore Guglani, Director of M/s Choice Cargo Agency Pvt. Ltd.	He, outsourced the CHA service on behalf of M/s Sada Steel Impex and M/s Jenni Enterprises, to M/s Mukesh Grover who actually cleared consignments at port	05.01.2024 and 02.01.2025	RUD- 20 & 21

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4	Shri Gaurav Khurana, Proprietor of M/s AG Enterprises	Domestic Buyer of impugned goods from M/s Sada Steel Impex and M/s Jenni Enterprises	27.12.2024	RUD- 22
5	Shri Kartik Gupta Proprietor of M/s M K Industries	Domestic Buyer of impugned goods from M/s Sada Steel Impex and M/s Jenni Enterprises	30.12.2024	RUD-23
6	Sh. Rakesh Sharma of M/s M K Overseas	Domestic Buyer of impugned goods from M/s Sada Steel Impex and M/s Jenni Enterprises	03.03.2025	RUD - 24

Relevant portions of the statements of key person connected with the instant matter are appended below:

7A. Statement dated 08.01.2024, 30.05.2024 & 06.10.2025 of Shri Arjun Guglani, Partner M/s Total Cargo Service, wherein he, inter alia, stated that: (RUD 14,15 &16)

- That being Partner and authorized signatory in M/s Total Cargo Services, he looked after all day-to-day work of M/s Total Cargo services;
- That M/s Total Cargo Services was mainly engaged in import of Cold Rolled Stainless Steel from China or through High Sea Sales;
- On being shown both the invoices (genuine as well as the invoice submitted before Indian Customs) bearing Invoice No. TY2202V3812 dated 07.09.2022 issued by Chinese supplier M/s H K Pingan Import and Export Co., Limited to M/s Sada Stainless Steel, one having unit price @ USD 1.565 per Kg and other @ USD 0.78 per KG , Shri Arjun Guglani stated that both invoices bear same invoice number but one has significantly higher rate than other for same goods i.e. Cold Rolled Stainless Steel grade-J3; that the invoice bearing higher rate is genuine and with lower rate is fake/fabricated; that above consignment under Invoice No. TY2202V3812 dated 07.09.2022 was purchased by his firm

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M/s Total Cargo Services from M/s Sada Steel Impex under High Sea Sale Agreement which was further cleared by his firm M/s Total Cargo Services, using fabricated invoices; at the lower rate of USD 0.78 Per Kg , before Indian Customs, under Bill of Entry No. 2725688 dated 03.10.2022, to evade appropriate Customs Duty; that these two are sets of parallel Invoices, used as modus-operandi to declare imported goods at lower value to evade Customs duty.

- that the actual price of the above goods was @ USD 1.565 per KG but his firm M/s Total Cargo Services declared the same @ USD 0.78 per KG to evade applicable Customs duty; that his firm M/s Total Cargo Services had been engaged in under-valuation of “Cold Rolled Stainless Steel” by using fake Invoices.
- On being asked how did he get these genuine and fabricated invoices, he stated that he used to get the above import invoices/fabricated invoices from Shri Amit Gupta (Proprietor of M/s Sada Steel Impex) ; that he declared these fake invoices before Indian Customs; that he knew shri Amit Gupta through his other firm M/s Total credit solutions as it provided car loan to shri Amit Gupta; That Shri Amit Gupta is proprietor of M/s Sada Steel Impex; that Shri Amit Gupta handled all activities of M/s Sada Steel Impex.

7B. Statement dated 20.12.2023, 21.12.2023 and 03.01.2025 of Shri Mukesh Grover (CHA, F-Card Holder) (R-13/2006) Prop. of M/s Mukesh Grover, recorded under Sec 108 of Customs Act, wherein inter-alia he stated that (RUD 17,18 &19)

- That he has done customs clearance for M/s Sada Steel Impex and M/s Jenni Enterprises which was given to him for customs clearance by one of his friends Shri Atul Kishore Guglani;
- That Shri Amit Gupta and Shri Atul Kishore Guglani are best friends; that he met Shri Amit Gupta in the office of Shri Atul Kishore Guglani situated at Dariya Ganj;
- That Shri Amit Gupta operates both M/s Sada Steel Impex and M/s Jenni Enterprises;
- That in his client firms, most of the imports of cold rolled stainless steel coil from China was cleared @ USD 0.75 per

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kg ; that the actual rates were higher than the declared price i.e higher than USD 0.75 per Kg;

- On being shown set of invoice No. TY2202V3812 dt. 07.09.2022 issued by Chinese supplier HP Pingan Imp and Exp Co. Limited to M/s Sada Steel Impex he remembered that the above goods was sold on High Sea Sale basis by Shri Amit Gupta of M/s Sada Steel Impex to M/s Total Cargo Services; that the actual value of the above goods was USD 1.56 per kg.
- that Shri Atul Kishore Guglani through his firm M/s Choice Cargo Agency Pvt Ltd) used to outsource CHA services to him (M/s Mukesh Grover) in respect of many firms including M/s Sada Steel Impex and M/s Jenni Enterprises; that he (M/s Mukesh Grover) used to raise Bills to M/s Choice Cargo Agency Pvt Ltd (Director Shri Atul Kishore Guglani) for his services for Customs Clearances of the consignment of many firms including M/s Sada Steel Impex and M/s Jenni Enterprises;
- that he used to receive the Customs documents from Shri Atul Kishore Guglani of M/s Choice Cargo Agencies Pvt Ltd, who was the person, whom he contacted for import consignment; that he was never in contact with owners Shri Amit Gupta and M/s Dheeraj Kumar Rao of M/s Sada Steel Impex and M/s Jenni Enterprises, respectively;
- that he cannot comment upon whether Shri Atul Kishore Guglani was aware about the actual price of the imported goods in above firms, but Shri Atul Kishore Guglani was the person who approved and finalized the documents/checklist for filing before Customs in respect of M/s Sada Steel Impex and M/s Jenni Enterprises;

Shri Mukesh Grover further denied his role in under-valuation done by firms for which he provided CHA services but he could not provide any satisfactory answer to having a long career as Customs Broker (since 2006) and handling the Commodity Cold Rolled Stainless Steel Coils since 2019, he was not aware about the actual price of the import goods or goods being under-valued.

7C. Statement dated 05.01.2024 and 02.01.2025 of Sh. Atul Kishore Guglani, Director of M/s Choice Cargo Agency Pvt. Ltd. was recorded under Sec 108 of Customs Act, wherein inter-alia he stated that (RUD 20 & 21)

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- That he is director of M/s Choice Cargo Agency Pvt Ltd (07AABFC9292K1Z2) and he has been providing CHA clearance services to M/s Sada Steel and M/s Jenni Enterprises; which he used to outsource to M/s Mukesh Grover (proprietorship of Shri Mukesh Grover)
- that against these outsourced services, M/s Mukesh Grover used to issue him bills which he passed on to the above importers under his invoices (issued by M/s Choice Cargo Agencies Pvt Ltd) by adding his fee/charges;
- That Shri Amit Gupta who is Proprietor of M/s Sada Steel Impex, was also handling and operating M/s Jenni Enterprises; that Shri Amit Gupta provided final approval to him to file documents with Customs in respect of M/s Sada Steel Impex and M/s Jenni Enterprises;
- That for M/s Sada Steel & M/s Jenni Enterprises, he used to receive import documents from Shri Amit Gupta; that Shri Amit Gupta controls M/s Sada Steel and M/s Jenni Enterprises; that his role in above firms was limited to clearance of import consignment only, for which he used to outsource the same to Shri Mukesh Grover;
- that Shri Amit Gupta worked as a commission agent for many importers for purchase of material from China from different foreign suppliers; that Shri Amit Gupta also himself imported Stainless Steel Coils in his firm M/s Sada Steel;
- On being asked about the actual price (USD 1.56 per kg) of goods under invoice No. TY2202V3812 dt. 07.09.2022 issued by Chinese supplier HP Pingan Imp and Exp Co. Limited to M/s Sada Steel Impex, he did not wish to comment on the same.
- He also stated that, he used to file the documents as provided by the importers.

Shri Atul Kishore Guglani further denied his role in undervaluation done by firms and contended that he was not aware of undervaluation, but could not provide any satisfactory answer to having had a long career as Customs Broker (since 2006) and having handled the Commodity Cold Rolled Stainless Steel Coils since 2016, how he was not aware of the actual import price.

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7D. Further, domestic buyers/sellers of M/s Sada Steel Impex and M/s Jenni Enterprises namely Shri Gaurav Khurana (Proprietor of M/s AG Enterprises) and Shri Kartik Gupta(Proprietor of M/s M K Industries), in their voluntary statement dated 27.12.2024 (**RUD 22**), 30.12.2024 (**RUD 23**) respectively, inter-alia stated that they used to contact Shri Amit Gupta, Proprietor of M/s Sada Steel Impex for making domestic purchases from M/s Sada Steel Impex and M/s Jenni Enterprises; further, Shri Rakesh Sharma Proprietor of M/s M K Overseas in his statement dated 03.03.2025 (**RUD 24**) stated that M/s Sada Steel Impex and M/s Jenni Enterprise was being controlled/operated by Shri Amit Gupta.

8 PAST INVESTIGATIONS AND UNDER-VALAUTION IN IMPORT OF COLD ROLLED STAINLESS STEEL COILS UNEARTHED BY THE DRI:

8.1 In 2019, DRI had undertaken a detailed investigation concerning import of Cold Rolled Stainless Steel Coils wherein certain Chinese suppliers/exporters were identified against whom genuine invoices—reflecting higher transaction values—were retrieved by DRI during the investigation proceedings. All such retrieved genuine invoices are enclosed as Annexure I (consisting of total 355 pages) (**RUD 25**). (Record of all proceedings vide which the invoices were retrieved –**RUD 26**). On comparison of these genuine Invoices to corresponding invoice declared before Indian customs authority at time of Customs clearance, it emerged that the Customs declaration were filed and cleared by the concerned importers at lower price, however the genuine invoice had higher price. Thus, a modus-operandi of using forged invoices-at under-valued price, by such importers was un-earthed. Analysis of above retrieved genuine Invoices, led to emergence of names of certain Chinese suppliers who, along with the Indian importers were suspected to be involved in issuing fabricated invoices-at lower value. Further, on comparison of the genuine/actual invoice with the invoices declared with the Indian Customs it emerged that the values of the imported item declared before Indian Customs authority had a common pattern in the declared import-price-range which found to be undervalued, to evade applicable Customs duties.

8.2. Further, these importers (i.e. entities who were found importing goods from the Chinese suppliers as per the retrieved invoices), in their voluntary statements recorded under Section 108 of the Customs Act 1962, accepted that the genuine invoices—reflecting higher transaction values, which were retrieved by the DRI, were actual invoices and the Chinese

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suppliers being hand-in-glove with the concerned importer issued fabricated/duplicate invoices-with lower transaction value. Further, these importers filed their import Customs declaration based on these fabricated invoices to evade appropriate Customs duty. The details are as under:

TABLE 4

S N O	Name of Case booked/Fi rm (M/s)	Name of the person (Shri) and Statement dated	GIST	Remarks
1	M/s Mahadev ji exports & others 5 firms	Vijay Goel, Statement dated 16.11.2022 (RUD 27) & 17.11.2022 (RUD 28)	-that the invoices retrieved by the DRI were genuine; -that he under-valued imported goods using fabricated invoices provided to him by Chinese suppliers; -that he used to receive these fabricated invoices from Chinese Suppliers; -that there was difference between actual and declared value of the impugned goods; -that he paid differential amount- on account of under- valuation, to Chinese suppliers through Hawala.	Shri Vijay Goel is alleged to be the master mind who controlled 06 firms and used them to import under-valued goods i.e. Cold Rolled Stainless Steel Coils
2.		Pranshu Goel (Proprietor), dated 16.11.2022 RUD 29)	- that there was huge difference of value of the invoices filed before Indian Customs during clearance and value of invoices retrieved by DRI. He further	Shri Pranshu Goel (son of Shri Vijay Goel), alleged to be assisted his father in under- valuation.

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			<p>mentioned that usually they clear the item stainless steel coil J3 grade at USD 0.75 per kg. However, the same item was being brought from Chinese supplier at 2 times higher rate.</p> <p>-that he used to receive two set of invoices (with same serial number) from Chinese suppliers one with higher value and other with lower value.</p> <p>- retrieved invoices are the actual invoices which has been received from the overseas Chinese suppliers</p>	
3	Seeno Stainless Steel	Deepak Jindal, dated 15.12.2023 RUD 30) & 06.02.2024 RUD 31)	<p>-that the invoices retrieved by the DRI were genuine;</p> <p>-that they used forged invoices in Customs declaration.</p> <p>- that he paid differential amount-on account of under-valuation of the imported goods, to Chinese suppliers through Hawala.</p>	Shri Deepak Jindal is proprietor of M/s Seeno Stainless Steel accused of importing under-valued goods i.e. Cold Rolled Stainless Steel Coils
4	SS Enterprises	Sandeep Garg, dated 15.12.2023 RUD 32) &	-that the invoices retrieved by the DRI were genuine.	Shri Sandeep Garg is proprietor of M/s S S

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		06.02.2024 RUD 33)	<p>- that he used to declare the imported goods at a lower price @ 0.75 to 0.98 USD Per KG, by way of using forged/duplicate under-valued Import Invoices, before Indian Customs, to evade Customs Duty. However, the actual price of imported goods was higher in the range of \$ 1.3 to \$ 2 USD Per Kg.</p> <p>-that they used forged invoices in Customs declaration;</p> <p>that he paid differential amount-on account of under-valuation, to Chinese suppliers through Cash.</p>	Enterprises accused of importing under-valued goods i.e. Cold Rolled Stainless Steel Coils
5	Royal Steel Trading	Vikas Jindal, dated 13.02.2024 RUD 34)	<p>-that the invoices retrieved by the DRI were genuine.</p> <p>-that they used forged invoices in Customs declaration.</p>	Shri Vikas Jindal is proprietor of M/s Royal Steel Trading accused of importing under-valued goods i.e. Cold Rolled Stainless Steel Coils
6	Gemini Metal Corporation	Gaurav Jindal dated 09.01.2024 RUD 35) & 04.03.2024 RUD 36)	<p>-that the invoices retrieved by the DRI were genuine;</p> <p>-that Chinese supplier supplied them forged</p>	Shri Gaurav Jindal is proprietor of M/s Gemini Metal

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			invoices-with lower value; -that they used forged invoices in Customs declaration	Corporation accused of importing under-valued goods i.e. Cold Rolled Stainless Steel Coils
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8.3. All the above controllers/proprietors had admitted during their voluntary statements recorded under Section 108 of Customs Act that the invoices retrieved by the DRI were genuine and accordingly, these genuine invoices could be relied upon during the instant matter. In respect of the firms appearing at Serial No. 1& 2 above, a Show Cause Notice (SCN) under Section 124 of the Customs Act 1962, on the ground of misdeclaration of the imported goods through undervaluation, bearing F.No. GEN/ADJ/ADC/2132/2023-Adjn dated. 15.11.2023 **(RUD-37)**, was issued by Additional Commissioner of Customs, Customs House, Mundra. The said SCN has been adjudicated by the Adjudicating Authority Customs Mundra vide OIO NO. MCH/ADC/AKM/258/2024-25 dated 20.01.2025 **(RUD 38)** wherein it has been found that impugned goods had been improperly imported to the extent that they were declared undervalued by hiding true transaction value by manipulating import documents with the help of foreign suppliers. Also, a Show Cause Notice under Section 28(4) of the Customs Act 1962, bearing F.No. GEN/ADJ/COMM/526/2024-Adjn-O/o-Pr.Commr-Cus-Mundra dated 08.11.2024 has also been issued by Pr Commissioner of Customs, Customs House, Mundra wherein demand of duty has been proposed on account of undervaluation of the imported goods **(RUD 39)**.

In respect of firms mentioned at Serial no. 3,4 & 5 a Show Cause Notice under Section 124 and 28(4) of the Customs Act 1962, bearing F.No. GEN/ADJ/COMM/582/2024-Adjn-O/o Pr Commr-Cus-Mundra dated 13.12.2024 **(RUD 40)** has also been issued by Pr Commissioner of Customs, Customs House, Mundra wherein demand of duty has been proposed on account of undervaluation of the imported goods. Further, for the firm mentioned at serial no 6, Show Cause Notice under Section 124 and 28(4) of the Customs Act 1962, bearing F.No. KOL/CUS/PC/PORT/GR.4/26/2024 dated 13.12.2024 has been issued by Pr Commissioner of Customs, Customs House, Kolkata and the same has been adjudicated by the concerned port Kolkata via OIO No. KOL/CUS/Commissioner /Port/Adjn/22/2025 date 16.06.2025. **(RUD 41)**

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8.4. Thus, the investigation conducted by DRI corroborated the genuineness of the retrieved invoices and role of certain Chinese suppliers in issuing these invoices.

8.5. Further, based on retrieved genuine invoices (**Annexure I**), 18 Chinese suppliers were identified who, as per evidences and statements recorded, were found to be accused of issuing fabricated invoices to the above firms:

TABLE-5

S. NO.	NAME OF THE CHINESE SUPPLIERS (M/s)	S. N O.	NAME OF THE CHINESE SUPPLIERS (M/s)
1	FIA INTERNATIONAL TRADING CO. LTD	11	FOSHAN WEN ZHI YUAN TRADING CO LTD
2	GUANGDONG GUANGXIN GOLDTEC HOLDINGS	12	FOSHAN XUANZHENG TRADING CO. LTD.
3	HONGKONG WINNER STEEL CO., LIMITED	13	FS-ESSENTIAL INTERNATIONAL CO. LIMITED
4	JIAYAO (HONGKONG) INTERNATIONAL GROUP LIMITED	14	GOLD COAST LOGISTICS HONG KONG LIMITED
5	LEO METALS LIMITED	15	HK PINGAN IMP AND EXP CO LIMITED
6	MFY METAL COMPANY LIMITED	16	HUAYE INTERNATIONAL DEVELOPMENT (HK) LIMITED
7	ART STEEL MAGIC CO., LIMITED	17	LIYI HONGKONG TRADING CO., LIMITED
8	FOSHAN JIA WEI IMPORT AND EXPORT CO. LTD.	18	NEWWEI TRADING COMPANY LIMITED
9	BOSOM METAL CO LTD		
10	FOSHAN TIAN MAIDUO IMPORT AND EXPORT CO. LTD.		

8.6. Further, few sample Copies of retrieved genuine invoices of the above Chinese suppliers vis-à-vis Customs invoices (collectively referred as Parallel Invoices in this SCN) are appended below for better understanding:

- I. Genuine Invoice of Chinese Supplier **M/S HONGKONG WINNER STEEL CO. LIMITED** to M/s Shri Mahadev Ji Exports vis-à-vis Invoice declared with Indian Customs Authorities:

F.No. GEN/ADJ/COMM/660/2025-Adjn

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HONGKONG WINNER STEEL CO., LIMITED
 Add: Room 803, Chevalier House, 45-51 Chatham Road South, Tsim Sha Tsui, Kowloon, Hong Kong

COMMERCIAL INVOICE

C/I NO.: 21LR3S33-38C ✓ INVOICE DATE: 2022/3/3

SHRI MAHADEV JI EXPORTS
 ADD: A-104, FIRST FLOOR, WAZIRPUR INDL. AREA, NEAR SHRI RAM CHOWK, DELHI-110052
 IEC CODE: CPTPG4273F
 GST: 07CPTPG4273F1ZM
 PAN: CPTPG4273F
 MAIL: SHRIMAHADEVJI2000@GMAIL.COM
 PHONE: 9871576508

DESCRIPTION OF GOODS: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK
 PRICE TERM: CIF TO MUNDRA

NO.	DESCRIPTION OF GOODS	QUANTITY		Finish	UNIT PRICE	TOTAL AMOUNT
		(KGS)	(coils)		(USD/KG)	(USD)
1	600*0.26	3,760	1	2B	2.060	7,742.60
2	600*0.26	3,658	1	2B	2.060	7,535.48
3	650*0.26	4,192	1	2B	2.060	8,635.52
4	650*0.26	4,060	1	2B	2.060	8,363.60
5	650*0.26	3,560	1	2B	2.060	7,333.60
6	650*0.26	4,758	1	2B	2.060	9,801.48
7	650*0.26	4,094	1	2B	2.060	8,433.64
8	650*0.26	4,204	1	2B	1.700	7,146.80
9	600*0.26	3,724	1	2B	1.700	6,330.80
10	600*0.26	3,698	1	2B	1.700	6,286.60
11	650*0.26	4,118	1	2B	1.700	7,000.60
12	650*0.26	3,942	1	2B	1.700	6,701.40
13	650*0.26	4,138	1	2B	1.700	7,034.60
14	650*0.26	4,116	1	2B	1.700	6,997.20
Total		56,022	14	2B		105,346.92
Less Payment						105,346.92

BANK INFORMATION:
 BENEFICIARY : HONGKONG WINNER STEEL CO., LIMITED
 BENEFICIARY'S ADDRESS: ROOM 803, CHEVALIER HOUSE, 45-51 CHATHAM ROAD SOUTH, TSIM SHA TSUI, KOWLOON, HONG KONG
 BANK NAME: CITIBANK N.A., HONG KONG BRANCH
 ADD: 3 GARDEN ROAD, CENTRAL, HONG KONG
 ACCOUNT NUMBER: 705020349
 SWIFT CODE: CITIHKHX (CITIHKHXXXX * IF 11 CHARACTERS ARE REQUIRED)
 BANK CODE: 006
 BRANCH CODE: 391 * IF PAYING FROM HONG KONG BANKS

For and on behalf of
 HONGKONG WINNER STEEL CO., LIMITED

 Authorized Signature(s)

Singed By(Seller):

(Singed)
 12/1/24

Genuine Invoice of M/s Shri Mahadev Ji Exports with Invoice No. 21LR3S33-38C
retrieved during the Investigation

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

HONGKONG WINNER STEEL CO., LIMITED

Add.: Room 803, Chevalier House, 45-51 Chatham Road South, Tsim Sha Tsui, Kowloon, Hong Kong

COMMERCIAL INVOICE

INVOICE NO.: 21LR3S33-38C INVOICE DATE: 2022/3/3

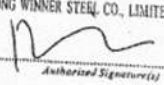
SHRI MAHADEV JIEXPORTS
ADD: A-104, FIRST FLOOR, WAZIRPUR INDL. AREA, NEAR SHRI RAM CHOWK, DELHI-110052
IEC CODE: CPTPG4273F
GST: 07CPTPG4273F1ZM
PAN: CPTPG4273F
MAIL: SHRIMHADEVJI2000@GMAIL.COM

DESCRIPTION OF GOODS: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK
PRICE TERM: CIF TO MUNDRA

NO.	DESCRIPTION OF GOODS	QUANTITY		Finish	UNIT PRICE (USD/KG)	TOTAL AMOUNT (USD)
		(KGS)	(coils)			
1	600*0.26	3,760	1	2B	0.750	2,820.00
2	600*0.26	3,658	1	2B	0.750	2,743.50
3	650*0.26	4,192	1	2B	0.750	3,144.00
4	650*0.26	4,060	1	2B	0.750	3,045.00
5	650*0.26	3,560	1	2B	0.750	2,670.00
6	650*0.26	4,758	1	2B	0.750	3,568.50
7	650*0.26	4,094	1	2B	0.750	3,070.50
8	650*0.26	4,204	1	2B	0.750	3,153.00
9	600*0.26	3,724	1	2B	0.750	2,793.00
10	600*0.26	3,698	1	2B	0.750	2,773.50
11	650*0.26	4,118	1	2B	0.750	3,088.50
12	650*0.26	3,942	1	2B	0.750	2,956.50
13	650*0.26	4,138	1	2B	0.750	3,103.50
14	650*0.26	4,116	1	2B	0.750	3,087.00
Total		56,022	14	2B	0.750	42,016.50

SAY USD DOLLAR: FOURTY TWO THOUSAND SIXTEEN AND FIFTY CENTS ONLY

BANK INFORMATION:
BENEFICIARY : HONGKONG WINNER STEEL CO., LIMITED
BENEFICIARY'S ADDRESS: ROOM 803, CHEVALIER HOUSE, 45-51 CHATHAM ROAD SOUTH, TSIM SHA TSUI, KOWLOON, HONG KONG
BANK NAME: CITIBANK N.A., HONG KONG BRANCH
ADD: 3 GARDEN ROAD, CENTRAL, HONG KONG
ACCOUNT NUMBER: 705020349
SWIFT CODE: CITIHKHX (CITIHKHXXXX * IF 11 CHARACTERS ARE REQUIRED)
BANK CODE: 006
BRANCH CODE: 391 * IF PAYING FROM HONG KONG BANKS

For and on behalf of
HONGKONG WINNER STEEL CO., LIMITED

Authorized Signatory(s)

Signed By(Seller):

Invoice of M/s Shri Mahadev Ji Exports with Invoice No. 21LR3S33-38C declared
before Indian Customs

On comparison of the above two invoices, it can be seen that Unit Price of impugned goods was suppressed from USD 2.060 & 1.700 per KG to USD 0.75 per Kg. However, every other aspect of both the invoices viz. Name of Chinese Supplier, Name of Importer, Description of Good, Dimension of Good, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc, are identical.

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

- II. Genuine Invoice of Chinese Supplier **M/S LEO METALS LIMITED** to M/s Shri Mahadev Ji Exports vis-à-vis Invoice declared with Custom Authorities.

LEO METALS LIMITED

FLAT/RM 1502 EASEY COMMERCIAL BUILDING 253-261 HENNESSY ROAD WANCHAI HK

COMMERCIAL INVOICE

BUYER: SHRI MAHADEV JI EXPORTS

Invoice No.: **211008J03-5**

A-104, FIRST FLOOR, WAZIRPUR INDL. AREA, NEAR

SHRI RAM CHOWK, DELHI-110052

EMAIL: SHRIMAHADEVJI2000@GMAIL.COM

IEC: CPTPG4273F

GST: 07CPTPG4273F1ZM

PAN: CPTPG4273F

Date: **DEC. 10, 2021**

COMMODITY: COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK

PRICE TERM: CIF MUNDRA, INDIA

MARKS & NOS	SIZE (MM)	QUANTITY (MTS)	UNIT PRICE (USD/MTS)	AMOUNT (USD)
N/M	0.26*510*C	14.172	2000	28344.00
	0.26*600*C	3.156	2000	6312.00
	0.26*650*C	14.822	2000	29644.00
	0.26*690*C	19.46	2000	38920.00
	Total :	51.610	/	103,220.00
TOTAL SAY U.S DOLLAR ONE HUNDRED AND THREE THOUSAND TWO HUNDRED AMOUNT: TWENTY ONLY.				

BANK INFORMATION

BENEFICIARY NAME: LEO METALS LIMITED

BANK NAME: BANK OF COMMUNICATIONS CO., LTD. OFFSHORE BANKING UNIT

BANK ADDRESS: NO. 188, YINCHENG ZHONG ROAD, SHANGHAI CHINA

SWIFT CODE: COMMCN3XOBU

BANK ACCOUNT NO.: OSA90000343828100

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Z

6/10/21
4/1/23

Genuine Invoice of M/s Shri Mahadev Ji Exports with Invoice No. 211008J03-5
retrieved during the Investigation

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

LEO METALS LIMITED

FLAT/RM 1502 EASEY COMMERCIAL BUILDING 253-261 HENNESSY ROAD WANCHAI HK

COMMERCIAL INVOICE

BUYER: SHRI MAHADEV JI EXPORTS

Invoice No.: **211008J03-5**

A-104,FIRST FLOOR, WAZIRPUR INDL. AREA, NEAR

SHRI RAM CHOWK, DELHI-110052

EMAIL:SHRIMAHADEVJI2000@GMAIL.COM

IEC:CPTPG4273F

GST:07CPTPG4273F1ZM

PAN:CPTPG4273F

Date: **DEC.10.2021****COMMODITY:COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX - STOCK****PRICE TERM: CIF MUNDRA,INDIA**

MARKS& NOS	SIZE (MM)	QUANTITY (MTS)	UNIT PRICE (USD/MTS)	AMOUNT (USD)
N/M	0.26*510*C	14.172	750	10629.00
	0.26*600*C	3.156	750	2367.00
	0.26*650*C	14.822	750	11116.50
	0.26*690*C	19.46	750	14595.00
	Total :	51.610	/	38,707.50
TOTAL SAY U.S DOLLAR THIRTY EIGHT THOUSAND SEVEN HUNDRED SEVEN AND AMOUNT: CENTS FIFTY ONLY.				

BANK INFORMATION

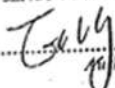
BENEFICIARY NAME: LEO METALS LIMITED

BANK NAME: BANK OF COMMUNICATIONS CO.,LTD. OFFSHORE BANKING UNIT

BANK ADDRESS:NO.188, YINCHENG ZHONG ROAD, SHANGHAI CHINA

SWIFT CODE: COMMCN3XOB

BANK ACCOUNT NO.: OSA90000343828100

For and on behalf of
Leo Metals Limited
麗寶金屬有限公司


 Authorized Signature(s)

Invoice of M/s Shri Mahadev Ji Exports with Invoice No. 211008J03-5 declared
before Indian Customs

On comparison of the above two invoices it can be seen that the Unit Price of impugned goods was suppressed from USD 2000 per MT to USD 750 MT, however, in this case also other aspects of both the invoices viz. Name of Chinese Supplier, Name of Importer, Description of Good, Dimension of Good, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc, are identical.

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

- III. Genuine Invoice of Chinese Supplier **M/S FIA INTERNATIONAL TRADING CO.,LTD** to M/s Shri Gemini Metal Corporation, vis-à-vis Invoice declared with Custom Authorities.

FIA INTERNATIONAL TRADING CO.,LTD
ROOM B22,7/F,KING YIP FACTORY BUILDING,59 KING YIP STREET,KWUN TONG,KOWLOON,HONGKONG

COMMERCIAL INVOICE
ORIGINAL

BUYER: GEMINI METAL CORPORATION
131 COTTON STREET 1ST FLOOR ROOM NO 106
KOLKATA 700007 WEST BENGAL, INDIA
GST NO.: 19ALXPJ7019A1ZW
PAN NO.: ALXPJ7019A
IEC: 0216907101
EMAIL: INFO@JINDALUTENSILS.COM
GEMINI.JINDAL@GMAIL.COM
PH: 03340445484
PH: +919831895292

INVOICE NO.: 23SS0324C-4
DATE: 2023/06/12

PRODUCT'S NAME	SIZE(MM)	QUANTITY COILS	TOTAL WEIGHT KG	UNIT PRICE USD/KG	AMOUNT USD
COLD ROLLED STAINLESS STEEL COILS EX STOCK GRADE J3	0.5*600*C	1	4,064.00	1.303	5,295.39
	0.5*600*C	1	4,174.00	1.303	5,438.72
	0.5*600*C	1	4,256.00	1.303	5,545.57
	0.5*600*C	1	4,218.00	1.303	5,496.05
	0.5*600*C	1	4,192.00	1.303	5,462.18
	0.5*600*C	1	3,672.00	1.303	4,784.62
	0.38*650*C	1	3,274.00	1.326	4,341.32
TOTAL		7	27,850.00	CIF KOLKATA,INDIA	36363.85

PAYMENT TERM: T/T

Please arrange payment to following account:
Account Name: FIA INTERNATIONAL TRADING CO.,LTD
Address: ROOM B22,7/F,KING YIP FACTORY BUILDING,59 KING YIP STREET,KWUN TONG,KOWLOON,HONGKONG
SELLER'S ACCOUNT NO.: 015-515-6811-3150
SELLER'S BANK: The Bank of East Asia,Limited
ADD: 10 Des Voeux Road Central, Hong Kong
SWIFT CODE: BEASHKHH

SIGNATURE 

Genuine Invoice of M/s Gemini Metal Corporation with Invoice No. 23SS0324C-4
retrieved during the Investigation

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

FIA INTERNATIONAL TRADING CO.,LTD

ROOM B22,7/F,KING YIP FACTORY BUILDING,59 KING YIP STREET,KWUN TONG,KOWLOON,HONGKONG

COMMERCIAL INVOICE**ORIGINAL**

BUYER: GEMINI METAL CORPORATION **INVOICE NO.:** 23SS0324C-4

131 COTTON STREET 1ST FLOOR ROOM NO 106
KOLKATA 700007 WEST BENGAL, INDIA
GST NO.: 19ALXPJ7019A1ZW
PAN NO.: ALXPJ7019A
IEC: 0216907101 **DATE:** 2023/06/12
EMAIL: INFO@JINDALUTENSILS.COM
GEMINI.JINDAL@GMAIL.COM
PH: 03340445484
PH: +919831895292

ADDRESS:

PRODUCT'S NAME	SIZE(MM)	QUANTITY	TOTAL WEIGHT	UNIT PRICE	AMOUNT
		COILS	KG	USD/KG	USD
COLD ROLLED STAINLESS STEEL COILS EX STOCK GRADE J3	0.5*600*C	1	4,064.00	0.825	3,352.80
	0.5*600*C	1	4,174.00	0.825	3,443.55
	0.5*600*C	1	4,256.00	0.825	3,511.20
	0.5*600*C	1	4,218.00	0.825	3,479.85
	0.5*600*C	1	4,192.00	0.825	3,458.40
	0.5*600*C	1	3,672.00	0.825	3,029.40
	0.38*650*C	1	3,274.00	0.825	2,701.05
TOTAL		7	27,850.00	CIF KOLKATA,INDIA	22976.25

PAYMENT TERM: T/T

Please arrange payment to following account:

Account Name: FIA INTERNATIONAL TRADING CO.,LTD

Address: ROOM B22,7/F,KING YIP FACTORY BUILDING,59 KING YIP STREET,KWUN TONG,KOWLOON,HONGKONG

SELLER'S ACCOUNT NO.: 015-515-6811-3150

SELLER'S BANK: The Bank of East Asia,Limited

ADD: 10 Des Voeux Road Central, Hong Kong

SWIFT CODE: BEASHKHH

Digitally signed by ADITYA GANGULY
Date: 2023.08.04 22:52:45 +05:30
Reason: Secured Document
Location: India

SIGNATURE



Invoice of M/s Gemini Metal Corporation with Invoice No. 23SS0324C-4 declared
before Indian Customs

On comparison of the above two invoices it can be seen that the Unit Price of impugned goods was suppressed from USD 1.303 to 1.326 per KG to USD 0.825 per KG, however, in this case also other aspects of both the invoices viz. Name of Chinese Supplier, Name of Importer, Description of Good, Dimension of Good, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc, are identical.

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

- IV. Genuine Invoice of Chinese Supplier **M/S MFY METAL COMPANY LIMITED** to M/s M K Overseas, vis-à-vis Invoice declared with Custom Authorities.

MFY METAL COMPANY LIMITED
ADD: FLAT/RM A1,9/F SILVERCORP INT'L 707-713 NATHAN RD MONGKOK KLN HONG KONG

PROFORMA INVOICE

P/I NO.: MFY230510RS01
DATE: MAY, 10TH, 2023

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SELLER: MFY METAL COMPANY LIMITED
ADD: FLAT/RM A1,9/F SILVERCORP INT'L 707-713 NATHAN RD MONGKOK KLN HONG KONG

BUYER: M. K OVERSEAS
ADDRESS: 310, 3RD FLOOR, VARDAN HOUSE, 7/28 ANSARI ROAD, DARYAGANJ, Central Delhi, Delhi, 110002
GSTIN: 07ASHPS8562N1ZT
PAN: ASHPS8562N
IEC: ASHPS8562N
E-MAIL: mkoverseas2011@gmail.com

This contract is made by and between the seller and the buyer whereby the seller agrees to sell and the buyer agrees to buy the undermentioned goods according to the terms and conditions stipulated below:

1. COMMODITY : COLD ROLLED STAINLESS STEEL COILS GRADE J3

SPECIFICATION (THICKNESS X WIDTH)	MATERIAL	SURFACE	QUANTITY (MT)	UNIT PRICE (USD/MT)	TOTAL (USD)
0.26*690MM	J3	2B/MILL	20	1410	28,200.00
0.33*620MM	J3	2B/MILL	7	1380	9,660.00
TOTAL			27		37,860.00

2. Price Terms: CIF MUNDRA, INDIA COIL WEIGHT: APPROX 3-5MT

3. Payment Terms: BY T/T: USD5000 as advance should be paid to the seller within 2days, balance against B/L COPY within 07 days.
If China Government impose Export Duty, the Duty have to borne by the buyer. Or these undelivery materials need to cancel automatically. Or the buyer bear all extra duty charge.
If India starts any anti-dumping or CVD against the product in this contract, all the duty charges must be covered by buyer at Indian port only.

4. Delivery : READY COILS, Once received deposit, delivery in 7-10days.

MFY METAL COMPANY LIMITED
Abhira
Authorized Signatory

Genuine Invoice of M/s M K Overseas with Invoice No. MFY230510RS01
retrieved during the Investigation

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

MFY METAL COMPANY LIMITED

ADD:FLAT/RM A1 9/F SILVERCORP INT'L TOWER 707-713 NATHAN RD MONGKOK KLN

COMMERCIAL INVOICE

Invoice No.: MFY230510RS01

Date: MAY,16TH,2023

To Messrs. **M. K OVERSEAS**

ADD: 310,3RD FLOOR,VARDAAN HOUSE, 7/28
 ANSARI ROAD,DARYAGANJ, CENTRAL DELHI,
 DELHI,110002
 GSTIN: 07ASHPS8562N1ZT
 PAN: ASHPS8562N
 IEC: ASHPS8562N
 E-MAIL: MKOVERSEAS2011@GMAIL.COM

Shipped By SEA From NANSHA,CHINA TO MUNDRA,INDIA

PAYMENT:100% TT IN ADVANCE

SHIPPING MARK:	Description of Goods	Unit	Quantity (MT)	Unit Price (USD/MT)	Amount
N/M	PRICE TERMS: CIF MUNDRA,INDIA				
	CR STAINLESS STEEL COILS GRADE J3 EX-STOCK				
	SIZE (MM):				
	0.26*690	MT	17.458	USD 850	USD 14,839.30
	0.33*620	MT	8.656	USD 850	USD 7,357.60
	BTOTAL:		26.114 MTS		USD 22,196.90

BANK INFORMATION:

Account Number: 420279047

Holder Name: MFY METAL COMPANY LIMITED

ADD:FLAT/RM A1 9/F SILVERCORP INT'L TOWER 707-713 NATHAN RD MONGKOK KLN HONG KONG

Bank Name: CITIBANK, N.A., HONG KONG BRANCH

Bank Location Country: HONG KONG

Bank Address: CHAMPION TOWER, THREE GARDEN ROAD, CENTRAL, HONG KONG

Account Type: Current

Swift/BIC: CITIHKHX

Bank Code: 006

Branch Number: 391

For and on behalf of
 MFY METAL COMPANY LIMITED
 名風揚金屬有限公司

 Authorized Signatory

Signature valid

Digitally signed by MUKESH GROVER
 Date: 2023.05.31 14:17:54 IST
 Reason: Secure Document
 Location: India

Invoice of M/s M K Overseas with Invoice No. MFY230510RS01 declared beforeIndian Customs

On comparison of the above two invoices, it can be seen that the Unit Price of impugned goods was suppressed from USD 1380 and 1410 per MT to USD 850 per MT, however, in this case also other aspects of both the invoices viz. Name of Chinese Supplier, Name of Importer, Description of Good, Dimension of Good, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc, are identical.

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

- V. Genuine Invoice of Chinese Supplier **M/S JIAYAO (HONGKONG) INTERNATIONAL GROUP LIMITED** to M/s Shri Mahadev ji Exports, vis-à-vis Invoice declared with Custom Authorities.

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JIAYAO(HONGKONG) INTERNATIONAL GROUP LIMITED
RM 4 16/F HO KING COMM CTR 2-16 FA YUEN ST MONG KOK KL

COMMERCIAL INVOICE

COMPANY: SHRI MAHADEV JI EXPORTS
A/D: A-104, FIRST FLOOR, WAZIRPUR INDL. AREA, NEAR SHRI RAM C
H.C. NO.: CPTPG4273F
GSTIN NO.: 07CPTPG4273F1ZM
PAN: CPTPG4273F
MAIL ID: SHRIMAHADDEVJ2009@GMAIL.COM
TEL.: 9871576508
CONTACT PERSON: PRANSHU GOEL

NO.: FSSR210302-2
DATE: 2021-3-12

Describe of Goods &/ or Services
COLD ROLLED STAINLESS STEEL COIL GRADE JJ STOCK LOT
FROM: SHEKOU, CHINA TO: MUNDRA, INDIA

NO.	GRADE	SURFACE	SIZE (MM)	PRICE (USD/KG)	QUANTITY (KG)	AMOUNT (USD)
1	201	2B	0.26*510	\$1.410	3608	\$5,087.28
2	201	2B	0.26*510	\$1.410	3490	\$4,920.90
3	201	2B	0.26*550	\$1.410	3744	\$5,279.04
4	201	2B	0.26*620	\$1.410	4278	\$6,031.98
5	201	2B	0.26*650	\$1.410	3682	\$5,191.62
6	201	2B	0.26*650	\$1.410	4216	\$5,944.56
7	201	2B	0.26*720	\$1.410	4400	\$6,204.00
8	201	2B	0.26*510	\$1.410	3342	\$4,712.22
9	201	2B	0.26*550	\$1.410	3874	\$5,462.34
10	201	2B	0.26*620	\$1.410	4228	\$5,961.48
11	201	2B	0.26*650	\$1.410	3320	\$4,681.20
12	201	2B	0.26*690	\$1.410	4240	\$5,978.40
13	201	2B	0.26*650	\$1.410	3996	\$5,634.36
14	201	2B	0.26*690	\$1.410	4426	\$6,240.66
15	201	2B	0.26*510	\$1.410	3482	\$4,909.62
16	201	2B	0.26*550	\$1.410	3616	\$5,098.56
17	201	2B	0.26*650	\$1.410	3914	\$5,518.74
18	201	2B	0.26*650	\$1.410	4072	\$5,741.52
19	201	2B	0.26*690	\$1.410	4066	\$5,733.06
20	201	2B	0.26*720	\$1.410	4268	\$6,017.88
21	201	2B	0.26*720	\$1.410	4026	\$5,676.66
22	201	2B	0.26*510	\$1.410	3456	\$4,872.96
23	201	2B	0.26*510	\$1.410	3478	\$4,901.98
24	201	2B	0.26*550	\$1.410	3724	\$5,250.84
25	201	2B	0.26*650	\$1.410	4108	\$5,792.28
26	201	2B	0.26*650	\$1.410	4036	\$5,690.76
27	201	2B	0.26*690	\$1.410	4220	\$5,950.20
28	201	2B	0.26*720	\$1.410	4476	\$6,311.16
TOTAL:					109786	\$1,54,798.26

TOTAL: SAY US DOLLARS

Company Bank Account Information
Beneficiary: JIAYAO HK INTL GROUP LTD
Beneficiary Bank Name: SHENZHEN DEVELOPMENT BANK CO LTD., J.L.O. OFFSHORE BANKING CENTRE
Bank Account No.: 11013250734101
Beneficiary Bank Address: 11/F, NO 5047 ROAD SHENNAN DONG, SHENZHEN P.R. CHINA
SWIFT Code: SZDBCNBS
Company Address: RM 4 16/F HO KING COMM CTR 2-16 FA YUEN ST MONG KOK KL

ISSUED BY BENEFICIARY
JIAYAO(HONGKONG) INTERNATIONAL GROUP LIMITED

Genuine Invoice of M/s Shri Mahadev Ji Exports with Invoice No. FSSR2103302-2
retrieved during the Investigation

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

JIAYAO(HONGKONG) INTERNATIONAL GROUP LIMITED

RM 4 16/F HO KING COMM CTR 2-16 FA YUEN ST MONG KOK KL

COMMERCIAL INVOICE

NO.: FSSR210302-2

COMPANY: SHRI MAHADEV JI EXPORTS

DATE: 2021/3/12

ADD: A-104, FIRST FLOOR, WAZIRPUR INDL AREA, NEAR SHRI RAM CHOWK, DELHI-110053

REC NO.: CPTPG4273F

GSTIN NO.: 07CPTPG4273F1ZM

PAN: CPTPG4273F

MAIL ID: SHRIMAHADDEVJ2009@GMAIL.COM

TEL.: 9871576508

CONTACT PERSON: PRANSHU GOEL

Description of Goods &/ or Services

COLD ROLLED STAINLESS STEEL COIL GRADE 316 EX STOCK

FROM: SHEKOU, CHINA

TO: MUNDRA, INDIA

NO.	GRADE	SURFACE	SIZE (MM)	PRICE (USD/KG)	QUANTITY (KG)	AMOUNT (USD)
CIF MUNDRA, INDIA						
1	316	2H	0.26*510	\$0.750	3681	\$2,760.00
2	316	2H	0.26*510	\$0.750	3490	\$2,617.50
3	316	2H	0.26*550	\$0.750	3744	\$2,808.00
4	316	2H	0.26*598	\$0.750	4278	\$3,208.50
5	316	2H	0.26*598	\$0.750	3682	\$2,761.50
6	316	2H	0.26*598	\$0.750	4216	\$3,162.00
7	316	2H	0.26*585	\$0.750	4400	\$3,300.00
8	316	2H	0.26*510	\$0.750	3342	\$2,506.50
9	316	2H	0.26*550	\$0.750	3874	\$2,905.50
10	316	2H	0.26*598	\$0.750	4278	\$3,208.50
11	316	2H	0.26*598	\$0.750	3320	\$2,490.00
12	316	2H	0.26*590	\$0.750	4240	\$3,180.00
13	316	2H	0.26*598	\$0.750	3996	\$2,997.00
14	316	2H	0.26*590	\$0.750	4426	\$3,319.50
15	316	2H	0.26*510	\$0.750	3482	\$2,611.50
16	316	2H	0.26*550	\$0.750	3616	\$2,712.00
17	316	2H	0.26*598	\$0.750	3914	\$2,935.50
18	316	2H	0.26*598	\$0.750	4072	\$3,054.00
19	316	2H	0.26*598	\$0.750	4066	\$3,049.50
20	316	2H	0.26*585	\$0.750	4268	\$3,201.00
21	316	2H	0.26*585	\$0.750	4026	\$3,019.50
22	316	2H	0.26*510	\$0.750	3456	\$2,592.00
23	316	2H	0.26*510	\$0.750	3478	\$2,608.50
24	316	2H	0.26*550	\$0.750	3724	\$2,793.00
25	316	2H	0.26*598	\$0.750	4108	\$3,081.00
26	316	2H	0.26*598	\$0.750	4036	\$3,027.00
27	316	2H	0.26*590	\$0.750	4220	\$3,165.00
28	316	2H	0.26*585	\$0.750	4476	\$3,357.00
TOTAL:					109786	\$82,339.50

TOTAL: SAY US DOLLARS EIGHTY TWO THOUSAND THREE HUNDRED THIRTY NINE AND CENTS FIFTY ONLY

Company Bank Account Information

Beneficiary: JIAYAO HONGKONG LTD

Beneficiary Bank Name: SHENZHEN DEVELOPMENT BANK CO LTD., H.O. OFFSHORE BANKING CENTRE

Bank Account No.: 11013208714101

Beneficiary Bank Address: 11/F, NO 5047 ROAD SHENWAN DONG, SHENZHEN P.R. CHINA

SWIFT Code: SZDBCN33

Company Address: RM 4 16/F HO KING COMM CTR 2-16 FA YUEN ST MONG KOK KL

ISSUED BY BENEFICIARY
JIAYAO(HONGKONG) INTERNATIONAL GROUP LIMITED

Invoice of M/s Shri Mahadev Ji Exports with Invoice No. FSSR2103302-2 declared before Indian Customs

On comparison of the above two invoices, it can be seen that there is difference in Description of goods and Unit Price of impugned goods (from USD 1.410 per KG to USD 0.75 per KG), however, in this case also other aspects of both the invoices viz. Name of Chinese Supplier, Name of Importer, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc., are identical

F.No. GEN/ADJ/COMM/660/2025-Adjn

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- VI. Genuine Invoice of Chinese Supplier **M/S GUANGDONG GUANGXIN GOLDTECH HOLDINGS CO., LTD.** to M/s Goel Exim, vis-à-vis Invoice declared with Custom Authorities.

GUANGDONG GUANGXIN GOLDTECH HOLDINGS CO.,LTD					
12 FLOOR, EAST TOWER, NO.1000 XINGANG EAST ROAD, HAIZHU DISTRICT, GUANGZHOU, CHINA					
INVOICE			ORIGINAL		
TO MESSRS.			Invoice No.:	SMJ210301705-1	
GOEL EXIM			INV Date:	2021/4/9	
GROUND FLOOR, A-84/1, INDUSTRIAL AREA, WAZIRPUR, NEW DELHI, NORTH WEST DELHI, DELHI, 110052 IEC NO. - AIFPG0671A E mail - Goelxim69@gmail.com Phone No - 9818084989 Pan No. - AIFPG0671A 07AIFPG0671A1ZW					
From CHINA			To MUNDRA, INDIA		
Terms of payment: TT			FILE NAME: SMJ210301705		
MARKING	Description of Goods	Quantity (MT)	Unit Price(USD/MT)	Amount (USD)	
N/M	COLD ROLLED STAINLESS STEEL COIL EX- STOCK		CFR MUNDRA, INDIA		
	2*690	4.434	2110	9355.74	
	0.9*690	4.306	2110	9085.66	
	0.58*690	4.294	2124	9120.46	
	1.5*690	4.284	2110	9039.24	
	2*690	4.276	2110	9022.36	
	1.2*690	4.252	2110	8971.72	
	1.2*730	4.248	2110	8963.28	
	2*690	4.232	2110	8929.52	
	0.9*690	4.22	2110	8904.20	
	1.2*690	4.21	2110	8883.10	
	1.5*690	4.19	2110	8840.90	
	0.58*690	4.184	2124	8886.82	
	0.68*690	4.142	2110	8739.62	
	2*690	4.128	2110	8710.08	
	0.58*690	4.098	2124	8704.15	
	1.2*690	3.972	2110	8380.92	
	1.5*730	4.482	2110	9457.02	
	1.5*730	4.492	2110	9478.12	
	0.58*690	4.36	2124	9260.64	
	0.68*690	4.422	2110	9330.42	
	1.2*690	4.606	2110	9718.66	
	1.2*730	4.552	2110	9604.72	
	1.2*730	4.394	2110	9271.34	
	1.2*730	4.658	2110	9828.38	
	MADE IN CHINA				
	TOTAL		103.436		218487.06
				SAY USD two hundred and eighteen thousand four hundred and eighty-seven point zero six ONLY.	

WE CERTIFY THAT THE GOODS ARE OF CHINA ORIGIN

GUANGXIN GOLDTECH HOLDINGS CO., LTD. CHINA

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Genuine Invoice of M/s Goel Exim with Invoice No. SMJ210301705-1 retrieved during the Investigation

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GUANGDONG GUANGXIN GOLDTEC HOLDINGS CO.,LTD					
12 FLOOR, EAST TOWER, NO.1000 XINGANG EAST ROAD, HAIZHU DISTRICT, GUANGZHOU, CHINA					
INVOICE			ORIGINAL		
TO MESSRS.			Invoice No.:	SMJ210301705-1	
GOEL EXIM			INV Date:	2021/4/9	
GROUND FLOOR, A-84/1, INDUSTRIAL AREA, WAZIRPUR, NEW DELHI, NORTH WEST DELHI, DELHI, 110052 IEC NO. - AIFPG0671A E mail - Goelxim89@gmail.com Phone No - 9818084989 Pan No. - AIFPG0671A 07AIFPG0671A1ZW					
From CHINA			To MUNDRA, INDIA		
Terms of payment: TT			FILE NAME: SMJ210301002		
MARKING	Description of Goods	Quantity (MT)	Unit Price(USD/MT)	Amount (USD)	
N/M	COLD ROLLED STAINLESS STEEL COIL EX- STOCK		CFR MUNDRA, INDIA		
	2*690	4.434	750	3325.50	
	0.9*690	4.306	750	3229.50	
	0.58*690	4.294	750	3220.50	
	1.5*690	4.284	750	3213.00	
	2*690	4.276	750	3207.00	
	1.2*690	4.252	750	3189.00	
	1.2*730	4.248	750	3186.00	
	2*690	4.232	750	3174.00	
	0.9*690	4.22	750	3165.00	
	1.2*690	4.21	750	3157.50	
	1.5*690	4.19	750	3142.50	
	0.58*690	4.184	750	3138.00	
	0.68*690	4.142	750	3106.50	
	2*690	4.128	750	3096.00	
	0.58*690	4.098	750	3073.50	
	1.2*690	3.972	750	2979.00	
	1.5*730	4.482	750	3361.50	
	1.5*730	4.492	750	3369.00	
	0.58*690	4.36	750	3270.00	
	0.68*690	4.422	750	3316.50	
	1.2*690	4.606	750	3454.50	
	1.2*730	4.552	750	3414.00	
	1.2*730	4.394	750	3295.50	
	1.2*730	4.658	750	3493.50	
		MADE IN CHINA			
		TOTAL	103.436		77577.00
WE CERTIFY THAT THE GOODS ARE OF CHINA ORIGIN.			SAY USD seven thousand seven hundred and seventy seven thousand only		

Invoice of M/s Goel Exim with Invoice No. SMJ210301705-1 declared before Indian Customs

On comparison of the above two invoices it can be seen that the Unit Price of impugned goods was suppressed from USD 2110 and 2124 per MT to 750 per MT to USD 850 per MT, however, in this case also other aspects of both the invoices viz. Name of Chinese Supplier, Name of Importer, Description of Good, Dimension of

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Good, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc, are identical

VII. Genuine Invoice of Chinese Supplier M/s FOSHAN XUANZHENG TRADING CO., LTD., to M/s Goel Exim, vis-à-vis Invoice declared with Custom Authorities.

(95)

FOSHAN XUANZHENG TRADING CO.,LTD.

ROOM F, UNIT 2109, BUILDING 2, THRIVE UNITE IFC, 1ST SHIHLONG SOUTH ROAD, GUICHENG, NANHAI DISTRICT, FOSHAN

COMMERCIAL INVOICE

ORIGINAL

BUYER: GOEL EXIM

GROUND FLOOR, A84/1, INDUSTRIAL AREA, WAZIRPUR, NEW DELHI,
NORTHWEST DELHI, DELHI, 110052
IEC NO.: AIFPG0671A

ADDRESS: E MAIL: GOELXIM69@GMAIL.COM
PHONE NO: 9818084989
PAN NO.: AIFPG0671A
GST NO.: 07AIFPG0671A1ZV

INVOICE NO.: GXGJ-SMJ210401013-3CI

DATE: 2021-08-07

CONTRACT NO.: GXGJ-SMJ210401013

PRODUCT'S NAME	SIZE(MM)	QUANTITY	TOTAL WEIGHT	UNIT PRICE	AMOUNT
		COIL	KG	USD/KG	USD
COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX- STOCK	0.35*580	4	15688	1409	22104.39
	0.35*690	2	9595	1399	13423.41
	0.35*510	6	19958	1409	28120.82
	0.35*485	3	10454	1409	14729.69
	0.35*603	10	38674	1399	54104.93
	0.35*620	3	10908	1399	15260.29
	0.35*530	1	3694	1409	5204.85
MADE IN CHINA					
TOTAL		29	108971		152948.37

SAY USD ONE HUNDRED FIFTY TWO THOUSAND THREE HUNDRED FORTY FOUR AND CENTS THIRTY FOUR ONLY.

WE CERTIFY THAT THE GOODS ARE OF CHINA ORIGIN.

FOSHAN XUANZHENG TRADING CO., LTD.
易有限公司

81725.25

Genuine Invoice of M/s Goel Exim with Invoice No. GXGJ-SMJ210401013-3CI
retrieved during the Investigation

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FOSHAN XUANZHENG TRADING CO.,LTD.

ROOM F, UNIT 2109, BUILDING 2, THIRUVENKATE IFC, 1ST SHILONG SOUTH ROAD, GUICHENG, NANHAI DISTRICT, FOSHAN

COMMERCIAL INVOICE

ORIGINAL

BUYER: GOEL EXIM

INVOICE NO.: GXGJ-SMJ210401013-3CI

GROUND FLOOR, A84/1, INDUSTRIAL AREA, WAZIRPUR, NEW
DELHI, NORTHWEST DELHI, DELHI, 110052
IEC NO.: AIFPG0671A

DATE: 2021-08-07

ADDRESS: E MAIL: GOELEXIM69@GMAIL.COM
PHONE NO: 9818084989
PAN NO.: AIFPG0671A
GST NO.: 07AIFPG0671A1ZW

CONTRACT NO.: GXGJ-SMJ210401013

PRODUCT'S NAME	SIZE(MM)	QUANTITY	TOTAL WEIGHT	UNIT PRICE	AMOUNT
		COIL	KG	USD/KG	USD
COLD ROLLED STAINLESS STEEL COIL GRADE J3 EX- STOCK	0.35*580	4	15688	750	11766.00
	0.35*690	2	9595	750	7196.25
	0.35*510	6	19958	750	14968.50
	0.35*485	3	10454	750	7840.50
	0.35*603	10	38674	750	29005.50
	0.35*620	3	10908	750	8181.00
	0.35*530	1	3694	750	2770.50
MADE IN CHINA					81728.25
TOTAL		29	108971		

SAY USD EIGHTY ONE THOUSAND SEVEN HUNDRED TWENTY EIGHT AND CENTS TWENTY FIVE ONLY

WE CERTIFY THAT THE GOODS ARE OF CHINA ORIGIN.



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Invoice of M/s Goel Exim with Invoice No. GXGJ-SMJ210401013-3CI declared
before Indian Customs

On comparison of the above two invoices, it can be seen that the Unit Price of impugned goods was suppressed from USD 1399 to 1409 per MT to USD 750 per MT, however, in this case also other aspects of both the invoices viz. Name of Chinese Supplier, Name of Importer, Description of Good, Dimension of Good, Weight of Good, Bank Account details and Bank Details of Chinese supplier etc, are identical.

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8.7 Thus, ongoing through above sets of parallel invoices (genuine as well as invoices submitted before Indian Customs), it can be seen that the declared price before Indian Customs, of the impugned goods i.e. Cold Rolled Stainless Steel Coils (of different grade) was lower, however, the actual price as per retrieved genuine invoices, was much higher. In addition, a striking similar pattern of declared transaction value was also revealed in all such importers (i.e. entities who were found importing goods from the Chinese suppliers as per the retrieved invoices) who declared goods at identical or closely matching undervalued price ranges for the impugned goods (Cold Rolled Stainless Steel Coils grade J3 at USD 0.75 per KG to USD 1.1 per KG and grade J2 at USD 1.1 per KG) despite sourcing from different suppliers. This uniformity in under-declaration strongly suggests a deliberate and coordinated practice rather than isolated instances of valuation errors or commercial negotiations. The level of consistency in undervaluation across unrelated entities indicates a systemic modus operandi aimed at evading customs duties and gaining unfair market advantage. Therefore, value of all other supplies by the above suspected Chinese suppliers for Cold Rolled Stainless Steel Coils appear doubtful. In addition, genuineness of price of the impugned goods supplied by other Chinese suppliers at same price, is also questionable.

8.8 In view of the above, it appears that there exist sufficient grounds to conclude that any importer declaring values within the same suspicious price range might be engaging in similar undervaluation practices. The convergence of under-reported values across multiple importers and availability of genuine retrieved invoices issued by above Chinese suppliers as credible documentation to support genuine prices, provide indication of intentional misdeclaration with the aim to evade applicable Customs duties. Therefore, it was imperative that any importers declaring import values within this identified undervalue price range need to be subjected to enhanced scrutiny.

9. IMPORT HISTORY OF M/S SADA STEEL IMPEX AND M/S JENNI ENTERPRISES VIS-À-VIS GENUINE INVOICES RETRIVED BY DRI HQ, NEW DELHI:

9.1 On analysing the past import data, it was observed that from the year 2020 onwards, M/s Sada Steel Impex imported the impugned goods i.e. Cold Rolled Stainless Steel Coil (of Grade J3 and J2) from various suspected Chinese suppliers who had a doubtful history of issuing fabricated under-valued invoices, as discovered during the investigation by DRI concerning import of cold rolled stainless steel , namely M/S FIA INTERNATIONAL TRADING CO. LTD, M/S GUANGDONG GUANGXIN GOLDTEC HOLDINGS,

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M/S HONGKONG WINNER STEEL CO., LIMITED, M/S JIAYAO (HONGKONG) INTERNATIONAL GROUP LIMITED, M/S LEO METALS LIMITED, M/S MFY METAL COMPANY LIMITED. The details of the all-Chinese suppliers of M/s Sada Steel Impex supplying the impugned goods i.e. Cold Rolled Stainless Steel Coils is as under:

TABLE-6

S No	NAME OF THE CHINESE SUPPLIER (M/S)
1	ALLWELL INDUSTRY COMPANY LIMITED
2	AOFENG METAL MATERIAL CO., LTD.
3	CROSS LINK INTERNATIONAL TRADING CO
4	EMETAL COMPANY LIMITED
5	FIA INTERNATIONAL TRADING CO.,LTD*
6	FOSHAN CHUANGSHENGDIAN IMP &EXP CO
7	FOSHAN INTERNATIONAL TRADE CO. LTD.
8	GUANGDONG GUANGXIN GOLDTEC HOLDINGS*
9	GUANGDONG GUOHAO IMPORT AND EXPORT
10	HISSARIA INTERNATIONAL SDN. BHD
11	HONGKONG WINNER STEEL CO., LIMITED*
12	JIAYAO(HONGKONG)INTERNATIONAL GROUP-
13	LEO METALS LIMITED*
14	LIJIE STAINLESS STEEL COMPANY LIMIT
15	MCH STEEL INDUSTRY CO., LIMITED
16	MFY METAL COMPANY LIMITED*
17	OUGE INDUSTRIAL CO., LIMITED
18	SHANDONG MENGYIN HUARUN IMP AND EXP
19	SINOSTEEL SHENZHEN CO.,LTD
20	SPLENDOR INTERNATIONAL BUSINESS CO.

*The Chinese suppliers appearing at Sr No. 5, 8,11,12,13 & 16 are suspected of having history of issuing fabricated under-valued invoices as retrieved by DRI in the investigation concerning import of cold rolled stainless steel.

9.2 Similarly, import data of **M/s Jenni Enterprises**, also revealed imports from such doubtful Chinese suppliers who had a doubtful history of issuing fabricated under-valued invoices, as discovered during the investigation by DRI concerning import of cold rolled stainless steel, namely M/S FOSHAN XUANZHENG TRADING CO., Ltd., M/S LEO METALS LIMITED, M/S MFY

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METAL COMPANY LIMITED, M/S JIAYAO (HONGKONG) INTERNATIONAL GROUP. The details of the all-Chinese suppliers of M/s Jenni Enterprises supplying the impugned goods i.e. Cold Rolled Stainless Steel Coils is as under:

TABLE-7

S No	NAME OF THE CHINESE SUPPLIER (M/S)
1	CROSS LINK INTERNATIONAL TRADING CO
2	EMETAL COMPANY LIMITED
3	FOSHAN XUANZHENG TRADING CO., LTD.*
4	FUJIAN ZANYANG FOOD CO., LTD.
5	JIAYAO(HONGKONG)INTERNATIONAL GROUP*
6	LEO METALS LIMITED*
7	MFY METAL COMPANY LIMITED*

*The Chinese suppliers appearing at Sr No. 3, 5,6 & 7 are suspected having history of issuing fabricated under-valued invoices in the past investigations.

9.3 Thus, investigation revealed that actual price of the impugned goods supplied by above Chinese suppliers, was significantly higher but the prices which was declared before Indian Customs authorities were under-valued to evade applicable appropriate duty. In view of the above, value of all other supplies by the above Chinese suppliers for Cold Rolled Stainless Steel Coils appear doubtful.

10. ACTUAL RANGE OF VALUES AS FOUND DURING THE INVESTIGATION FOR IDENTIFYING UNDER-VALUATION

Based on retrieved genuine invoices during the referred investigation (**Annexure-I**), and where corresponding invoices as declared before Indian Customs authorities were found to be filed at suppressed (under-valued) prices, a price range has been determined for the goods—Cold Rolled Stainless Steel Coils of various grades—which appears to reflect the actual value of the impugned goods.

TABLE-8: ACTUAL PRICE RANGE DERIVED IN USD PER KG (MINIMUM TO MAXIMUM) FOR SUSPECTED CHINESE SUPPLIERS AS FOUND MENTIONED IN

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**THEIR GENUINE RETRIEVED INVOICES FOR DIFFERENT GRADES OF COLD
ROLLED STAINLESS STEEL**

S. NO .	NAME OF THE SUSPECTED CHINESE SUPPLIERS (M/S)	RANGE OF UNIT PRICE AS PER GENUINE INVOICE (In USD PER KG)							
		J3 GRADE		J2 GRADE		N1 GRADE		304 GRADE	
		MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM
1	FIA INTERNATIONAL TRADING CO. LTD	1.273	1.441	-	-	-	-	-	-
2	GUANGDONG GUANGXIN GOLDTEC HOLDINGS	1.39	2.124	-	-	-	-	2.11	2.131
3	HONGKONG WINNER STEEL CO., LIMITED	1.32	2.35	-	-	-	-	2.35	2.35
4	JIAYAO (HONGKONG) INTERNATIONAL GROUP LIMITED	1.41	2.965	-	-	-	-	-	-
5	LEO METALS LIMITED	1.155	2	-	-	-	-	2.785	2.93
6	MFY METAL COMPANY LIMITED	1.333	1.395	-	-	-	-	-	-
7	ART STEEL MAGIC CO., LIMITED	1.36	1.36	-	-	-	-	-	-
8	FOSHAN JIA WEI IMPORT AND EXPORT CO. LTD.	1.7	3.01	-	-	-	-	-	-
9	BOSOM METAL CO LTD	1.90	1.98	-	-	-	-	-	-
10	FOSHAN TIAN MAIDUO IMPORT AND EXPORT CO. LTD.	1.925	3.215	-	-	-	-	-	-
11	FOSHAN WEN ZHI YUAN TRADING CO LTD	1.15	2.03	-	-	-	-	-	-
12	FOSHAN XUANZHENG	1.301	2.317	-	-	-	-	-	-

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	TRADING CO. LTD.								
13	FS-ESSENTIAL INTERNATIONAL CO. LIMITED	1.25	3.01	-	-	-	-	2.865	3.162
14	GOLD COAST LOGISTICS HONG KONG LIMITED	1.7	1.7	-	-	-	-	-	-
15	HK PINGAN IMP AND EXP CO LIMITED	1.56	1.56	-	-	-	-	-	-
16	HUAYE INTERNATIONAL DEVELOPMENT (HK) LIMITED	1.44	2.855	-	-	-	-	-	-
17	LIYI HONGKONG TRADING CO., LIMITED	1.715	2.65	-	-	-	-	-	-
18	NEWWEI TRADING COMPANY LIMITED	1.14	1.587	1.244	1.465	1.413	1.497	-	-

Thus, on analysing the above data, it can be seen that actual price range derived (by taking all value found mentioned in genuine invoices) for different grades of stainless-Steel Coils ranges from USD 1.14 per KG to 3.215 per KG for Grade J3 and USD 1.244 per KG to 1.465 per KG for Grade J2.

11. PATTERN OF THE TRANSACTION VALUE DECLARED BY M/S SADA STEEL IMPEX AND M/S JENNI ENTERPRISES, WHICH APPEARS TO BE UNDER-VALUED:

11.1. On analysis of import data of M/s Sada Steel Impex and M/s Jenni Enterprises, it emerged that these firms imported the impugned goods at substantial lower price (which has been found from the genuine invoices retrieved by DRI) from the same set of Chinese overseas suppliers, at or about the same time and around same commercial levels. It has been observed that M/s Sada Steel Impex declared and cleared the impugned goods at a price range of USD 0.75 to 1.1 per KG for grade J3 and USD 1.1 for grade J2, which appears to be under-valued in light of evidences (retrieved genuine invoices) and discussion in para supra.

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11.2 Similarly, M/s Jenni Enterprises declared and cleared the impugned goods at a price range of USD 0.75 to 0.85 per KG for grade J3 which appears to be under-valued in light of evidences (retrieved genuine invoices) and discussion in para supra.

11.3 The details of the all-Chinese suppliers of the firms- M/s Sada Steel Impex and M/s Jenni Enterprises supplying the impugned goods i.e. Cold Rolled Stainless Steel Coil Grade of Grade J3 and Grade J2 with price ranges are as under:

In respect of M/s Sada Steel Impex:

TABLE-9

S No	NAME OF THE CHINESE SUPPLIER (M/S)	Price Range in USD per KG (Grade J3)	Price Range in USD per KG (Grade J2)
1	ALLWELL INDUSTRY COMPANY LIMITED	0.75	NA
2	AOFENG METAL MATERIAL CO., LTD.	0.75	NA
3	CROSS LINK INTERNATIONAL TRADING CO	0.75 to 0.85	NA
4	EMETAL COMPANY LIMITED	0.875	NA
5	FIA INTERNATIONAL TRADING CO.,LTD*	0.85 to 1.1	NA
6	FOSHAN CHUANGSHENGDIAN IMP &EXP CO	0.75	NA
7	FOSHAN INTERNATIONAL TRADE CO. LTD.	0.75	NA
8	GUANGDONG GUANGXIN GOLDTEC HOLDINGS*	0.75	NA
9	GUANGDONG GUOHAO IMPORT AND EXPORT	0.75	NA
10	HISSARIA INTERNATIONAL SDN. BHD	0.76	NA
11	HONGKONG WINNER STEEL CO., LIMITED*	0.75 to 0.85	NA
12	JIAYAO(HONGKONG)INTERNATIONAL GROUP-	0.75	NA
13	LEO METALS LIMITED*	0.875	NA
14	LIJIE STAINLESS STEEL COMPANY LIMIT	0.85 to 1.1	NA
15	MCH STEEL INDUSTRY CO., LIMITED	0.75 to 0.88	NA

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16	MFY METAL COMPANY LIMITED*	0.75 to 0.95	NA
17	OUGE INDUSTRIAL CO., LIMITED	1.1	NA
18	SHANDONG MENGYIN HUARUN IMP AND EXP	0.75	NA
19	SINOSTEEL SHENZHEN CO.,LTD	0.75	NA
20	SPLENDOR INTERNATIONAL BUSINESS CO.	0.85 to 1.1	1.1

*The Chinese suppliers appearing at Sr No. 5,8,11,12,13 & 16 are suspected having history of issuing fabricated under-valued invoices in the past investigations.

In respect of M/s Jenni Enterprises:

TABLE-10

S No	NAME OF THE CHINESE SUPPLIER (M/S)	Price Range in USD per KG (Grade J3)	Price Range in USD per KG (Grade J2)
1	CROSS LINK INTERNATIONAL TRADING CO	0.75 to 0.85	NA
2	EMETAL COMPANY LIMITED	0.78 to 0.85	NA
3	FOSHAN XUANZHENG TRADING CO., LTD.*	0.75	NA
4	FUJIAN ZANYANG FOOD CO., LTD.	0.75	NA
5	JIAYAO(HONGKONG)INTERNATIONAL GROUP*	0.75	NA
6	LEO METALS LIMITED*	0.75 to 0.8	NA
7	MFY METAL COMPANY LIMITED*	0.75	NA

*The Chinese suppliers appearing at Sr No. 3,5,6 & 7 are suspected having history of issuing fabricated under-valued invoices in the past investigations.

11.4 Further, a brief of Bills of Entry filed by M/s SADA STEEL IMPEX and M/s JEENI ENTERPRISES for Cold Rolled Stainless Steel Coil (Ex Stock) for different grades are as under:

In r/o M/S SADA STEEL IMPEX

TABLE-11
(Year 2020-23)

S No.	Total Bills of Entry	Grade	Assessable Value (INR)	Duty Paid (INR)
1	86	J3	34,90,21,326	9,99,74,538

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2	1	J2	77,26,360	21,42,906
	TOTAL		35,67,47,686	10,21,17,444

In r/o M/s JEENI ENTERPRISES**TABLE-12**
(Year 2021-22)

S No.	Total Bills of Entry	Grade	Assessable Value (INR)	Duty Paid (INR)
1	30	J3	10,53,77,767	2,92,26,524
	TOTAL		10,53,77,767	2,92,26,524

11.5 An examination of past import transactions undertaken by M/s Sada Steel Impex, involving the importation of Cold Rolled Stainless Steel in grades J3 and J2, and by M/s Jenni Enterprises in respect of grade J3 of the said goods, reveals indications of under-valuation. The subject goods were procured from certain Chinese suppliers who are suspected of engaging in the issuance of forged invoices and have been previously associated with cases involving systematic under-valuation. The declared transaction value in these consignments exhibit a striking similarity to the pricing patterns typically observed during the investigation involving such suspect suppliers. Accordingly, a strong presumption now arises that all past import consignments effected by the aforementioned importers from these suspected Chinese Suppliers and other Chinese Suppliers (at similar price) are liable to be considered as under-valued and liable for appropriate penal action under the Customs Act, 1962.

12. WRONGFUL AVAILMENT OF DUTY BENEFITS UNDER S.NO.734 OF NOTIFICATION NO. 50/2018-CUSTOMS DATED 30.06.2018 (SAPTA BENEFITS) BY M/s SADA STEEL IMPEX:

12.1 The investigation also revealed that M/s Sada Steel Impex (IEC-AYHPG1590N) was also importing the impugned goods i.e. "Cold Rolled Stainless Steel Strips/Coils grade J3" by mis-classifying the same under CTH 72209022 and wrongly availed the benefit (at Sr. No.734) under Notification No.50/2018-Customs dated 30.06.2018. Ministry of Finance (Department of

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

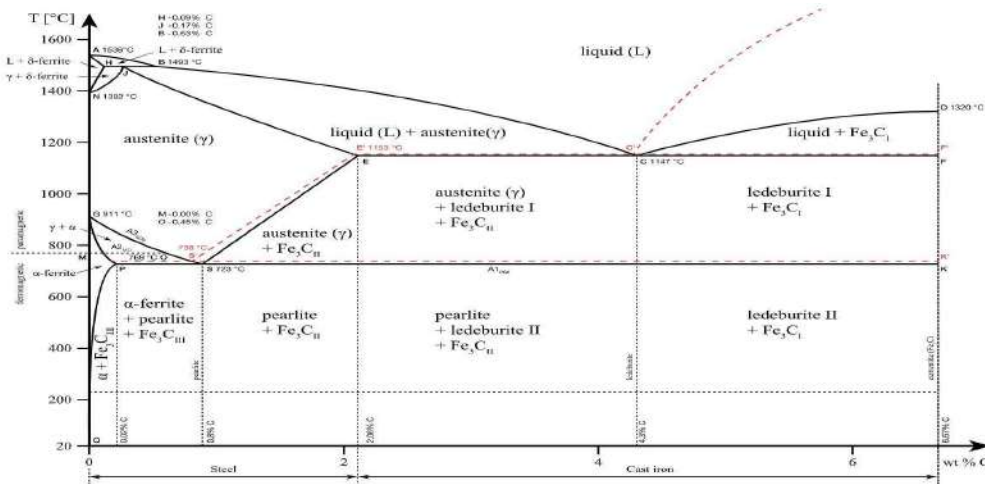
Revenue) Notification No.50/2018-Customs dated 30.06.2018, provides for concessional benefits in duty of Customs for the goods imported from countries listed in APPENDIX I (Bangladesh, People's Republic of China, Republic of Korea & Sri Lanka)) and APPENDIX II (Bangladesh & Lao People's Democratic Republic) of the notification. Further, the Chapter/ Heading No/ Sub-heading No./ tariff item and description of the eligible goods have been specified in column (2) and (3) respectively, of the Table annexed with the notification. In addition, extent of tariff concession (percentage of applied rate of duty in %) has been provided in in column (4) of the said Table. Entry No. 734 of the said notification provides for:

Sr No	Chapter Head No., Heading No., sub-Heading No., or Tariff Head	Description of good	Extent of Tariff concession (Percentage of applied rate of duty, in %)
1	2	3	4
A-734	7220 90 22	All Goods	45

12.2 Thus, there is a provision of concession of Customs duty in Notification No.50/2018-Customs dated 30.06.2018, for the goods imported from China & falling under CTH 72209022 i.e. Flat-Rolled Stainless Steel (less than 600MM width) - *Nickel Chromium Austenitic Type*.

13.EXAMINATION OF MILL TEST REPORT OF IMPORTED GOODS VIS-À-VIS AUSTENITIC STAINLESS STEEL OF NICKEL CHROMIUM TYPE:

13.1 The Austenitic Stainless Steel refers to a type of Non-Magnetic alloy of Iron. Its Face Centered Cubic crystal structure is formed at elevated temperature above 723° C and below 1493° C, as shown in the Iron-Carbon diagram below:



13.2 Further, Austenitic Stainless-Steels are divided into 300-series and 200-series subgroups. In 300 series stainless steels, the austenitic structure obtained primarily by adding Nickel (Ni). In 200 series stainless steels the structure is obtained by adding Manganese (Mn) and Nitrogen (N), with a small amount of Nickel (Ni) content, making 200 series a cost-effective nickel-chromium austenitic type stainless steel. Composition of different grades of Austenitic Steel with respect to different alloying elements, as specified in Bureau of Indian Standards (BIS) IS 6911:1992, are as follows:

Table 1 Chemical Composition
(Clauses 7.1 and 7.2)

Grade Designation		C	Si Max	Mn	Ni	Cr	Mo	S Max	P Max	Others
Letter Symbol [see IS 1762 (Part 1)]	Numerical Symbol ISS	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Ferritic Steels										
X 04Cr12	405	0.08 Max	1.0	1.0 Max	—	11.5-13.5	—	0.030	0.040	Al 0.10-0.30
X 07Cr17	430	0.12 Max	1.0	1.0 Max	0.50 Max	16.0-18.0	—	0.030	0.040	
Martensitic Steel										
X 12Cr12	410	0.06-0.15	1.0	1.0 Max	1.0 Max	11.5-13.5	—	0.030	0.040	
X 20Cr13	420 S1	0.16-0.25	1.0	1.0 Max	1.0 Max	12.0-14.0	—	0.030	0.040	
X 30Cr13	420 S2	0.26-0.35	1.0	1.0 Max	1.0 Max	12.0-14.0	—	0.030	0.040	
X 40Cr13	420 S3	0.35-0.45	1.0	1.0 Max	1.0 Max	12.0-14.0	—	0.030	0.040	
X 15Cr16Ni2	431	0.10-0.20	1.0	1.0 Max	1.25-2.50	15.0-17.0	—	0.030	0.045	
X 18Cr17Mo	440	0.95-1.20	1.0	1.0 Max	0.50 Max	16.0-18.0	0.75 Max	0.030	0.045	
Austenitic Steels										
X 10Cr17Mn6Ni4N20	201	0.20 Max	1.0	4.0-8.0	3.5-5.5	16.0-18.0	—	0.030	0.045	N 0.05-0.20
X 07Cr17Mn12Ni4	201 A	0.12 Max	1.0	10.0-14.0	3.5-5.5	16.0-18.0	—	0.030	0.045	
X 10Cr18Mn9Ni5	202	0.15 Max	1.0	8.0-10.0	4.0-6.0	17.0-19.0	—	0.030	0.045	
X 10Cr17Ni7	301	0.15 Max	1.0	2.0 Max	6.0-8.0	16.0-18.0	—	0.030	0.045	
X 07Cr18Ni9	302	0.15 Max	1.0	2.0 Max	8.0-10.0	17.0-19.0	—	0.030	0.045	
X 04Cr19Ni9	304 S1	0.08 Max	1.0	2.0 Max	8.0-10.0	17.5-20.0	—	0.03	0.045	

IS 6911 : 1992

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

X 02Cr19Ni10	304 S2	0.03 Max	1.0	2.0 Max	8.0-12.0	17.5-20.0	—	0.030	0.045	
X 15Cr24Ni13	309	0.20 Max	1.5	2.0 Max	11.0-15.0	22.0-25.0	—	0.030	0.045	
X 20Cr25Ni20	310	0.25 Max	2.5	2.0 Max	18.0-21.0	24.0-26.0	—	0.030	0.045	
X 04Cr17Ni12Mo2	316	0.03 Max	1.0	2.0 Max	10.0-14.0	16.0-18.0	2.0-3.0	0.030	0.045	
X 02Cr17Ni12Mo2	316 L	0.08 Max	1.0	2.0 Max	10.0-14.0	16.0-18.0	2.0-3.0	0.030	0.045	
X 04Cr17Ni12Mo2Ti	316 Ti	0.08 Max	1.0	2.0 Max	10.0-14.0	16.0-18.0	2.0-3.0	0.030	0.045	Ti Min-5 (C + N) Ti Max-0.80
X 04Cr18Ni10Ti	321	0.08 Max	1.0	2.0 Max	9.0-12.0	17.0-19.0	—	0.030	0.045	Ti Min-5 (C + N) Ti Max-0.8
X 04Cr18Ni10Nb	347	0.08 Max	1.0	2.0 Max	9.0-12.0	17.0-19.0	—	0.030	0.045	Nb Min-10C Nb Max-1.0

13.3 In view of the above, it is clearly evident that the **Austenitic Stainless-Steel** grades have essentially content by weight (%) of alloying elements Chromium (Cr) and Nickel (Ni) as:

Subgroups of Austenitic stainless steel		Minimum-Maximum range of Nickel (Ni) (% by weight)	Minimum-Maximum range of Chromium (Cr) (% by weight)
300 Series		6 - 21	16 - 25
200 Series		3.5 - 6	16-19

13.4. Further, **Mill Test Certificate (MTC)**, also known as a Mill Certificate or a Material Test Report (MTR), is a quality assurance document used in the manufacturing and inspection of materials, particularly in industries such as metalworking, construction, and manufacturing. The primary purpose of an MTC is to provide essential information about the properties and quality of a specific batch or lot of material, typically metals like steel or other critical materials used in construction or engineering projects. During analysis of Mill Test Certificate/Report uploaded by M/s Sada Steel Impex (IEC-AYHPG1590N), the content of Nickel (Ni) and Chromium (Cr) in the imported goods (Cold Rolled Stainless Steel Coil of J3 grade) was not found as per specification required to qualify in any of the two subgroups (200 & 300 Series) of Austenitic stainless steel.

13.5 Mill Test Certificates/Report of the imported Cold Rolled Stainless Steel of J3 grade, uploaded by M/s Sada Steel Impex, on the E- Sanchit portal, are appended below:

In respect of M/s Sada Steel Impex

- A. Sample MTC/MTR in respect of overseas supplier M/S Guangdong Guanxin Goldtech Holdings Co. Ltd;

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

GUANGDONG GUANGXIN GOLDTEC HOLDINGS CO. LTD																			
12 FLOOR, EAST TOWER, NO.1000 XINGANG EAST ROAD, HAIZHU DISTRICT GUANGZHOU, CHINA																			
INSPECTION CERTIFICATE																			
Customer		Sada Steel Impex										Product		COLD ROLLED STAINLESS STEEL COILS EX STOCK J3					
Address		1/10526, Ground Floor, Mohan Park, Shahdara Delhi-110032										Invoice No		MCHBD201203		Date of Issue		2020/12/25	
Specification												Certificate NO				Date of Issue		2020/12/25	
NO	Steel. Mat NO	Specification (mm)	Weight (T)	Chemical Composition (wt.%) (Heat Analysis)										Tensile Test (Gauge Length=50mm)			Hard Ness (HRC)		
				C	Si	Mn	P	N	Al	S	Cr	Ni	Cu	Yield Strength (MPa)	Tensile Strength (MPa)	Rear Extension Degree (%)			
1	YB-H1KR-01	0.18*595	7.972	0.13633	0.3587	10.6541	0.0363	0.1475	0.0133	0.0029	13.4214	1.2520	0.7547	-	-	-	225-230		
2	YB-H1KR-02	0.19*595	16.054	0.13518	0.3590	10.6425	0.0359	0.1487	0.0130	0.0025	13.4272	1.2581	0.7503	-	-	-	225-230		
3	YB-H1KR-03	0.19*580	3.924	0.13517	0.3507	10.6428	0.0355	0.1480	0.0135	0.0028	13.4274	1.2583	0.7504	-	-	-	225-230		
4	YB-H1KR-04	0.19*510	10.612	0.13510	0.3506	10.6423	0.0353	0.1485	0.0131	0.0026	13.4275	1.2587	0.7501	-	-	-	225-230		
5	YB-H1KR-05	0.26*595	10.820	0.13687	0.3452	10.6461	0.0330	0.1420	0.0129	0.0021	13.4145	1.2961	0.7714	-	-	-	225-230		
6	YB-H1KR-06	0.26*510	3.300	0.13689	0.3450	10.6467	0.0335	0.1428	0.0127	0.0022	13.4149	1.2964	0.7718	-	-	-	225-230		
Total			52.682	Remarks															
WE CERTIFY THAT THE PRODUCT HAS BEEN MANUFACTURED AND TESTED IN ACCORDANCE WITH THE ABOVE REQUIREMENTS AND THAT THE RESULTS MEET THE REQUIREMENTS. <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div> <p>Signature Not Verified</p> <p>Digitally signed by Jagan Kumar</p> <p>Date: 2021.01.07 15:22:41 IST</p> <p>Reason: Secure Document</p> <p>Location: India</p> </div> <div> <p>SIGNATURE:</p>  <p>DATE:</p> </div> </div>																			

B. Sample MTC/MTR in respect of overseas supplier M/s Sinosteel Shenzhen Co. Ltd.,

SINO STEEL SHENZHEN CO., LTD																	
A4E-22F, INTL TRADE CENTER BLDG, RENMIN SOUTH ROAD, LUOHU DISTRICT, SHENZHEN, 518014, CHINA																	
MILL TEST CERTIFICATE																	
Customer: Sada Steel Impex																	
Description		Stainless steel cold rolled coils Grade J3		Grade		J3		INVOICE No		20LRAM1201B		Delivery date		2020-12-18			
NO.	Size	QUANTITY (COILS)	Net weight (KG)	C	Ni	Cr	Mn	Cu	Si	P	S	Heat number	J3-19				
1	550*0.26	1	3412	0.143	1.292	13.420	9.648	0.705	0.311	0.043	0.006	XF2010235-A					
2	550*0.26	1	3782	0.146	1.262	13.620	9.660	0.817	0.338	0.046	0.008	XF2010235-B					
3	550*0.26	1	3652	0.128	1.263	13.530	9.663	0.686	0.330	0.046	0.008	XF2010244-A					
4	550*0.26	1	3648	0.127	1.247	13.460	9.691	0.605	0.336	0.044	0.008	XF2010244-B					
5	550*0.26	1	3582	0.139	1.281	13.460	9.614	0.573	0.311	0.044	0.007	XF2011003-A					
6	550*0.26	1	3628	0.150	1.250	13.390	9.631	0.786	0.411	0.045	0.008	XF2011003-B					
7	550*0.26	1	3614	0.139	1.320	13.640	9.677	0.588	0.427	0.044	0.007	122504-B					
8	550*0.26	1	3616	0.149	1.228	13.580	9.626	0.636	0.404	0.043	0.007	XF2010255-A					
9	550*0.26	1	3634	0.126	1.221	13.640	9.627	0.637	0.333	0.043	0.007	XF2010255-B					
10	550*0.26	1	3790	0.137	1.258	13.460	9.650	0.826	0.326	0.045	0.008	XF2010255-C					
11	550*0.26	1	3592	0.127	1.312	13.540	9.583	0.696	0.426	0.046	0.006	XF2010231-A					
12	550*0.26	1	3412	0.137	1.239	13.690	9.665	0.686	0.439	0.043	0.006	XF2010231-B					
13	595*0.26	1	3658	0.128	1.280	13.410	9.628	0.599	0.425	0.043	0.006	XF2010239-B					
14	595*0.26	1	3548	0.149	1.231	13.410	9.650	0.687	0.340	0.046	0.007	122504-A					
TOTAL		14	50588														
Remark (备注): n/m mark <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div> <p>We hereby certify that the products has been tested and inspected with the order and specification and that the result comply with the requirement of the order and specification</p> </div> <div> <p>SINO STEEL SHENZHEN CO., LTD</p> <p>(QUALITY ASSURANCE)</p>  </div> </div>																	

Signature Not Verified

Digitally signed by Jagan Kumar

Date: 2021.01.08 15:23:23 IST


Reason: Secure Document

Location: India

C. Sample MTC/MTR in respect of overseas supplier M/s Sinosteel Shenzhen Co. Ltd.,

F.No. GEN/ADJ/COMM/660/2025-Adjn
SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

SINOSTEEL SHENZHEN CO., LTD
Add.:22/F,INT'L TRADE CENTER BLDG,RENMIN SOUTH ROAD,LUOYU DISTRICT, SHENZHEN,518014,CHINA
MILL TEST CERTIFICATE

Customer:Sada Steel Impex												
Description		Stainless steel cold rolled coils Grade J3	Grade		J3	INVOICE No	20LRAM1201-A	Delivery date	2020-12-17			
产品名称			钢种									
NO.	Size	QUANTITY (COIL)	Net weight	Main Chemical Composition (%) 主要化学成分 (%)								Heat number
			(KG)	C	Ni	Cr	Mn	Cu	Si	P	S	炉号
1	595*0.19	1	3992	0.143	1.292	13.420	9.648	0.705	0.311	0.043	0.006	XF2010235-A
2	595*0.19	1	3738	0.146	1.262	13.620	9.600	0.817	0.338	0.046	0.008	XF2010235-B
3	595*0.19	1	4076	0.128	1.263	13.530	9.663	0.686	0.330	0.046	0.008	XF2010244-A
4	595*0.19	1	3602	0.127	1.247	13.460	9.691	0.605	0.336	0.044	0.008	XF2010244-B
5	595*0.19	1	3712	0.139	1.281	13.460	9.614	0.573	0.311	0.044	0.007	XF2011003-A
6	595*0.19	1	4048	0.150	1.250	13.390	9.631	0.786	0.411	0.045	0.008	XF2011003-B
7	550*0.26	1	3480	0.139	1.320	13.640	9.677	0.588	0.427	0.044	0.007	122504-B
8	595*0.19	1	3938	0.149	1.228	13.580	9.626	0.636	0.404	0.043	0.007	XF2010255-A
9	595*0.19	1	1250	0.126	1.221	13.640	9.627	0.637	0.333	0.043	0.007	XF2010255-B
10	595*0.19	1	2378	0.137	1.258	13.460	9.650	0.826	0.326	0.045	0.008	XF2010255-C
11	595*0.19	1	3662	0.127	1.312	13.540	9.583	0.696	0.426	0.046	0.006	XF2010231-A
12	595*0.19	1	4102	0.137	1.239	13.690	9.665	0.686	0.439	0.043	0.006	XF2010231-B
13	595*0.19	1	3760	0.139	1.294	13.440	9.678	0.741	0.393	0.045	0.006	XF2010239-A
14	595*0.19	1	3728	0.128	1.280	13.410	9.628	0.599	0.425	0.043	0.006	XF2010239-B
15	550*0.26	1	3696	0.149	1.231	13.410	9.650	0.687	0.340	0.046	0.007	122504-A
TOTAL		15	53162									
Remark (备注): n/m mark						SINOSTEEL SHENZHEN CO., LTD (QUALITY ASSURANCE)						
We hereby certify that the products has been tested and inspected with the order and specification and that the result comply with the requirement of the order and specification												

Signature Not Verified
Digitally signed by Jyoti Kumar
Date: 2021.01.05 16:29 IST
Reason: Secure Document
Location: India

D. Sample MTC/MTR in respect of overseas supplier M M/S Guangdong Guanxin Goldtech Holdings Co. Ltd.;

GUANGDONG GUANGXIN GOLDTEC HOLDINGS CO. LTD																			
12 FLOOR,EAST TOWER,NO.1000 XINGANG EAST ROAD, HAIZHU DISTRICT GUANGZHOU, CHINA																			
INSPECTION CERTIFICATE																			
Customer				Sada Steel Impex								Product				COLD ROLLED STAINLESS STEEL COILS EX STOCK J3			
Address				1/10526, Ground Floor, Mohan Park, Shahdara Delhi-110032								Invoice No		MCHBD201101-2		Date of Issue		2021/3/3	
Specification												Certificate NO				Date of Issue		2021/3/3	
NO	Steel, Mat NO	Specification (mm)	Weight (T)	Chemical Composition (wt.%) (Heat Analysis)										Tensile Test(Gauge Length=50mm)			Hard Ness (HRB)		
				C	Si	Mn	P	N	Al	S	Cr	Ni	Cu	Yield Strength (MPa)	Tensile Strength (MPa)	Rear Extension Degree (%)			
1	EK-YUB1-01	0.3*79.5	12.764	0.13630	0.3587	10.6541	0.0363	0.1475	0.0133	0.0029	13.4214	1.2520	0.7547	-	-	-	225-230		
2	EK-YUB1-02	0.3*59	14.538	0.13635	0.3580	10.6544	0.0367	0.1477	0.0131	0.0029	13.4218	1.2526	0.7549	-	-	-	225-230		
Total			27.302	Remarks															
WE CERTIFY THAT THE PRODUCT HAS BEEN MANUFACTURED AND TESTED IN ACCORDANCE WITH THE ABOVE REQUIREMENTS AND THAT THE RESULTS MEET THE REQUIREMENTS.												SIGNATURE:							
STAMP: DATE:												DATE:							

Signature Not Verified
Digitally signed by Jyoti Kumar
Date: 2021.03.27 12:29 IST
Reason: Secure Document
Location: India

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

E. Sample MTC/MTR in respect of overseas supplier M/s Jiayao(Hongkong) International Group Limited

JIAYAO(HONGKONG) INTERNATIONAL GROUP LIMITED															
RM2910, BUILDING 1, No.131, NORTH OF LINGNAN AVENUE, CHANCHENG DISTRICT, FOSHAN, GUANGDONG, CHINA															
INSPECTION CERTIFICATE															
Customer		SADA STEEL IMPEX				Product		CR STAINLESS STEEL COILS EX STOCK JS							
Purchaser						Customer Order NO				Date of Issue					
Specification		J1		Conduct NO		JSPS201116		Certificate NO		J018652580430		Delivery Date		20201117	
NO	Steel. Mat NO	Specification (mm)	Net Weight(KG)	Chemical Composition (wt %) (Heat Analysis)								Tensile Test (Gauge Length=50mm)			Hardness (HRC)
				C	Si	Mn	P	S	Cr	Ni	Cu	Yield Strength (MPa)	Tensile Strength (MPa)	Red Extension Degree (%)	
1	J1	0.20*598	3699	0.1208	0.4166	10.5696	0.0324	0.0147	12.5212	1.1284	0.5222	785	785	56	225-230
2	J1	0.20*510	3498	0.1129	0.4217	10.5456	0.0333	0.0144	12.4255	1.1329	0.5032	785	785	56	225-230
3	J1	0.13*510	3448	0.1203	0.4121	10.6849	0.0310	0.0134	12.2127	1.0322	0.5179	785	785	56	225-230
4	J1	0.20*550	3489	0.1311	0.4135	10.4320	0.0352	0.0153	12.5156	1.1749	0.5021	785	785	56	225-230
5	J1	0.20*550	3534	0.1298	0.4132	10.6849	0.0361	0.0134	12.2888	1.0035	0.5106	785	785	56	225-230
6	J1	0.20*550	3670	0.1293	0.4122	10.6847	0.0312	0.0137	12.2126	1.0324	0.5279	785	785	56	225-230
7	J1	0.20*550	3906	0.1203	0.4121	10.7021	0.0399	0.0185	12.2156	1.0396	0.5121	785	785	56	225-230
8	J1	0.20*510	3374	0.1209	0.4168	10.5639	0.0341	0.0149	12.5213	1.1285	0.5112	785	785	56	225-230
9	J1	0.20*510	3449	0.1311	0.4115	10.4320	0.0351	0.0153	12.5154	1.1749	0.5021	785	785	56	225-230
10	J1	0.20*510	3397	0.1208	0.4166	10.5696	0.0324	0.0147	12.5212	1.1284	0.5222	785	785	56	225-230
11	J1	0.20*510	3446	0.1129	0.4217	10.5456	0.0333	0.0144	12.4255	1.1329	0.5032	785	785	56	225-230
12	J1	0.20*510	3378	0.1293	0.4121	10.6849	0.0310	0.0134	12.2127	1.0322	0.5179	785	785	56	225-230
13	J1	0.20*510	3464	0.1311	0.4135	10.4320	0.0352	0.0153	12.5156	1.1749	0.5021	785	785	56	225-230
14	J1	0.20*510	3388	0.1298	0.4132	10.6849	0.0361	0.0134	12.2888	1.0035	0.5106	785	785	56	225-230
15	J1	0.20*485	2766	0.1293	0.4122	10.6847	0.0312	0.0137	12.2126	1.0324	0.5279	785	785	56	225-230
16	J1	0.20*510	3408	0.1203	0.4121	10.7021	0.0399	0.0185	12.2156	1.0396	0.5121	785	785	56	225-230
17	J1	0.20*510	3393	0.1209	0.4168	10.5639	0.0341	0.0149	12.5213	1.1285	0.5112	785	785	56	225-230
18	J1	0.20*510	3411	0.1231	0.4219	10.5483	0.0326	0.0148	13.4266	1.1325	0.5123	785	785	56	225-230
19	J1	0.20*510	3430	0.1203	0.3990	10.6849	0.0361	0.0134	13.2889	1.0396	0.5679	785	785	56	225-230
20	J1	0.20*510	3424	0.1222	0.3852	10.5981	0.0323	0.0145	12.5643	1.1035	0.5034	785	785	56	225-230
21	J1	0.20*510	3408	0.1203	0.4121	10.7021	0.0399	0.0185	12.2156	1.0396	0.5121	785	785	56	225-230
22	J1	0.20*510	3422	0.1222	0.3852	10.5981	0.0323	0.0145	12.5643	1.1035	0.5034	785	785	56	225-230
23	J1	0.20*510	3408	0.1203	0.4121	10.7021	0.0399	0.0185	12.2156	1.0396	0.5121	785	785	56	225-230
Total															
Sum		IT IS THE CERTIFICATE ALL THE PRODUCT IS QUALIFIED													
		STAMP: DATE:													
		SIGNATURE: DATE:													

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

F. Sample MTC/MTR in respect of overseas supplier M/s Jiayao(Hongkong) International Group Limited

JIAYAO(HONGKONG) INTERNATIONAL GROUP LIMITED															
RM2910, BUILDING 1, No.131, NORTH OF LINGNAN AVENUE, CHANCHENG DISTRICT, FOSHAN, GUANGDONG, CHINA															
INSPECTION CERTIFICATE															
Customer: SADA STEEL IMPEX										Product: CR STAINLESS STEEL COILS IN STOCK J3					
Purchaser:										Customer Order NO:		Date of Issue:			
Specification:										Certificate NO:		Delivery Date:			
NO	Steel, Mat NO	Specification (mm)	Net Weight(KG)	Chemical Composition (wt%) (Heat Analysis)								Tensile Test (Gauge Length=50mm)			Used New (HRB)
				C	Si	Mn	P	S	Cr	Ni	Cu	Yield Strength (MPa)	Tensile Strength (MPa)	Rear Extension Degree (%)	
1	J3	0.26*650	3836	0.1208	0.4166	10.5096	0.0324	0.0147	12.5212	1.1284	0.5222	785	785	56	225-230
2	J3	0.26*650	3810	0.1129	0.4217	10.5456	0.0333	0.0144	12.4255	1.1329	0.5012	785	785	56	225-230
3	J3	0.26*650	4098	0.1263	0.4121	10.6848	0.0310	0.0134	12.2127	1.0322	0.5179	785	785	56	225-230
4	J3	0.26*650	3750	0.1311	0.4135	10.4320	0.0352	0.0153	12.5158	1.1749	0.5021	785	785	56	225-230
5	J3	0.26*650	3801	0.1298	0.4132	10.6849	0.0361	0.0134	12.2888	1.0353	0.5106	785	785	56	225-230
6	J3	0.26*650	3871	0.1293	0.4122	10.6847	0.0312	0.0137	12.2126	1.0324	0.5279	785	785	56	225-230
7	J3	0.26*650	3790	0.1203	0.4121	10.7921	0.0385	0.0185	12.2156	1.0706	0.5121	785	785	56	225-230
8	J3	0.26*650	3602	0.1209	0.4168	10.5639	0.0341	0.0149	12.5213	1.1293	0.5112	785	785	56	225-230
9	J3	0.26*650	3688	0.1301	0.4115	10.4320	0.0351	0.0153	12.5134	1.1749	0.5021	785	785	56	225-230
10	J3	0.26*650	3654	0.1208	0.4166	10.5696	0.0324	0.0147	12.5212	1.1284	0.5222	785	785	56	225-230
11	J3	0.26*650	3891	0.1129	0.4217	10.5456	0.0333	0.0144	12.4255	1.1329	0.5012	785	785	56	225-230
12	J3	0.26*650	3495	0.1293	0.4121	10.6848	0.0310	0.0134	12.2127	1.0322	0.5179	785	785	56	225-230
13	J3	0.26*485	3249	0.1303	0.4135	10.4320	0.0352	0.0153	12.5158	1.1749	0.5021	785	785	56	225-230
14	J3	0.26*485	3565	0.1298	0.4132	10.6849	0.0361	0.0134	12.2888	1.0353	0.5106	785	785	56	225-230
15	J3	0.26*485	3099	0.1293	0.4122	10.6847	0.0312	0.0137	12.2126	1.0324	0.5279	785	785	56	225-230
Total			54293												
IT IS THE CERTIFICATE ALL THE PRODUCT IS QUALIFIED															
SIGNATURE: _____ DATE: _____															

G. Sample MTC/MTR in respect of overseas supplier M/s Guangdong Guanxin Goldtech Holdings Co. Ltd.;

GUANGDONG GUANGXIN GOLDTECH HOLDINGS CO. LTD																	
12 FLOOR, EAST TOWER, NO. 1000 XINGANG EAST ROAD, HAIZHU DISTRICT GUANGZHOU, CHINA																	
INSPECTION CERTIFICATE																	
Customer: Sada Steel Impex										Product: EX STOCK COLD ROLLED STAINLESS STEEL COIL J3							
Address: 1/10526, Ground Floor, Mohan Park, Shahdara Delhi-110032										Invoice No: MCHBD201203-2		Date of Issue: 2021/3/10					
Specification:										Certificate NO:		Date of Issue: 2021/3/10					
NO	Steel, Mat NO	Specification (mm)	Weight (T)	Chemical Composition (wt%) (Heat Analysis)								Tensile Test (Gauge Length=50mm)			Hard Ness (HRB)		
				C	Si	Mn	P	N	Al	S	Cr	Ni	Cu	Yield Strength (MPa)		Tensile Strength (MPa)	Rear Extension Degree (%)
1	PU-WQ1T-01	0.19*510	3.994	0.13550	0.3567	10.6391	0.0362	0.1346	0.0127	0.0025	13.3564	1.2157	0.6754	-	-	-	225-230
2	PU-WQ1T-02	0.26*550	7.172	0.13635	0.3580	10.6541	0.0367	0.1477	0.0131	0.0029	13.4218	1.2526	0.7549	-	-	-	225-230
1	PU-WQ1T-03	0.26*510	10.060	0.13630	0.3587	10.6547	0.0363	0.1475	0.0133	0.0028	13.4214	1.2520	0.7547	-	-	-	225-230
2	PU-WQ1T-04	0.26*570	3.816	0.13634	0.3582	10.6545	0.0361	0.1474	0.0134	0.0027	13.4210	1.2522	0.7544	-	-	-	225-230
2	PU-WQ1T-05	0.26*603	2.636	0.13636	0.3585	10.6543	0.0365	0.1479	0.0135	0.0027	13.4214	1.2528	0.7541	-	-	-	225-230
Total			27.678	Remarks													
WE CERTIFY THAT THE PRODUCT HAS BEEN MANUFACTURED AND TESTED IN ACCORDANCE WITH THE ABOVE REQUIREMENTS AND THAT THE RESULTS MEET THE REQUIREMENTS.										SIGNATURE: _____							
Signature Not Verified Digitally signed by MUKESH GROVER Date: 2021.03.31 18:02:18 Reason: Secure Document Location: India										DATE: _____							

F.No. GEN/ADJ/COMM/660/2025-Adjn
SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

H. Sample MTC/MTR in respect of overseas supplier M/s Shandong Mengyin Huarun Imp And Exp.

工厂检验证明书

MILL TEST CERTIFICATE

山东蒙阴华润进出口有限公司

SHANDONG MENGYN HUARUN IMP. AND EXP. CO., LTD.

NO.205 XINCHENG ROAD,MENGYN COUNTY,SHANDONG,CHINA

TEL:0086-18669626822 FAX:0086-539-4272462

品名 (Commodity)			COLD ROLLED STAINLESS STEEL COILS EX STOCK J3			客户名称: Customer		SADA STEEL IMPEX							
表面加工 (Surface)			2B			合同号: Contract No.		2020HR120901							
发票号: Invoice No.			21PB0312			开单日期: Issue Date		MAR.12,2021							
序号	卷号	规格尺寸(mm)	件数(PKG)	重量(MT)	重量(MT)	炉号	化学成分 Chemical composition %								
No.	Coil No.	Size	Package	Net W.T.	Gross W.T.	Heat No.	C	Si	Mn	P	S	Ni	Cr	Cu	N
1	TA21-02-069	0.50MMX79/59MM	1	4.250	4.27	GYTA21-02-069	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
2	TA21-02-069	0.50MMX79/59MM	1	3.865	3.885	GYTA21-02-069	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
3	TA21-02-067	0.50MMX79/59MM	1	4.065	4.085	GYTA21-02-067	0.148	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
4	TA21-02-067	0.50MMX79/59MM	1	4.015	4.035	GYTA21-02-067	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
5	TA21-02-050	0.30MMX79.5MM	1	3.710	3.73	GYTA21-02-050	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
6	TA21-02-051	0.30MMX79.5MM	1	3.725	3.745	GYTA21-02-051	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
7	TA21-02-051	0.30MMX79.5MM	1	3.850	3.87	GYTA21-02-051	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
8	TA21-02-068	0.50MMX79/59MM	1	3.970	3.99	GYTA21-02-068	0.148	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
9	TA21-02-068	0.50MMX79/59MM	1	3.970	3.99	GYTA21-02-068	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
10	TA21-03-069	0.50MMX79/59MM	1	3.940	3.96	GYTA21-03-069	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
11	TA21-03-070	0.50MMX79/59MM	1	4.045	4.065	GYTA21-03-070	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
12	TA21-02-050	0.30MMX79.5MM	1	3.850	3.87	GYTA21-02-050	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
13	TA21-02-037	0.30MMX79.5MM	1	3.865	3.885	GYTA21-02-037	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
14	TA21-02-037	0.30MMX79.5MM	1	3.620	3.64	GYTA21-02-037	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
15	TA21-03-069	0.50MMX79/59MM	1	4.190	4.21	GYTA21-03-069	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
16	TA21-03-070	0.50MMX79/59MM	1	3.955	3.975	GYTA21-03-070	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
17	TA21-02-052	0.30MMX79.5MM	1	3.565	3.585	GYTA21-02-052	0.148	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
18	TA21-02-052	0.30MMX79.5MM	1	3.815	3.835	GYTA21-02-052	0.148	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087

SHANDONG MENGYN HUARUN IMP. AND EXP. CO., LTD.

NO.205 XINCHENG ROAD,MENGYN COUNTY,SHANDONG,CHINA

TEL:0086-18669626822 FAX:0086-539-4272462

19	TA21-03-064	0.30MMX79.5MM	1	3.925	3.945	GYTA21-03-064	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
20	TA21-03-064	0.30MMX79.5MM	1	4.010	4.03	GYTA21-03-064	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089
21	TA21-03-088	0.50MMX79/59MM	1	3.920	3.94	GYTA21-03-088	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087
			21	82.120	82.540										

本产品已按上述要求进行制造和检验，其结果符合要求，特此证明。
WE HEREBY CERTIFY THAT MATERIAL DESCRIBED HEREIN HAS MANUFACTURED AND TESTED WITH SATISFACTORY RESULTS IN ACCORDANCE
WITH THE REQUIREMENTS OF THE ABOVE MATERIAL SPECIFICATION.



F.No. GEN/ADJ/COMM/660/2025-Adjn
SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

I. Sample MTC/MTR in respect of overseas supplier M/s Leo Metals Limited

LEO METALS LIMITED													
MILL TEST CERTIFICATE													
COMMERCIAL INVOICE NO.:				210110J01-4A		GRADE:		201		FINISH:		2B	
CUSTOMER:				MUDIT IMPEX PRIVATE LIMITED						DATE:		MAR.05.2021	
COMMODITY:				STAINLESS STEEL COLD ROLLED COILS EX STOCK GRADE J3 HSN 72209022									
No.	COIL NO.	HEAT NO.	SPECIFICATION SIZE (MM)	WEIGHT (KGS)	CHEMICAL COMPOSITION(%)								
					C	Si	Mn	P	S	Cr	Ni	Cu	
1	260	H1247	0.26*550*C	3846	0.112	0.36	9.38	0.030	0.005	12.6	1.03	0.58	
2	261	H1248	0.26*550*C	3750	0.103	0.40	9.45	0.030	0.007	12.3	1.04	0.62	
3	262	H1249	0.26*550*C	3744	0.099	0.41	9.25	0.026	0.007	12.4	1.06	0.60	
4	263	H1250	0.26*550*C	3812	0.108	0.40	9.26	0.029	0.007	12.6	1.05	0.58	
5	264	H1251	0.26*550*C	3638	0.112	0.36	9.38	0.030	0.005	12.6	1.03	0.58	
6	265	H1252	0.26*550*C	3886	0.103	0.40	9.45	0.030	0.007	12.3	1.02	0.62	
7	266	H1253	0.26*550*C	3622	0.099	0.41	9.25	0.026	0.007	12.4	1.03	0.60	
8	267	H1254	0.26*550*C	3680	0.112	0.36	9.38	0.030	0.005	12.6	1.03	0.58	
9	268	H1255	0.26*550*C	3732	0.112	0.36	9.38	0.030	0.005	12.6	1.03	0.58	
10	269	H1256	0.26*510*C	3290	0.103	0.40	9.45	0.030	0.007	12.3	1.04	0.62	
11	270	H1257	0.26*510*C	3418	0.099	0.41	9.25	0.026	0.007	12.4	1.06	0.60	
12	271	H1258	0.26*570*C	3932	0.108	0.40	9.26	0.029	0.007	12.6	1.05	0.58	
13	272	H1259	0.26*550*C	3752	0.112	0.36	9.38	0.030	0.005	12.6	1.03	0.58	
14	273	H1260	0.26*550*C	3726	0.103	0.40	9.45	0.030	0.007	12.3	1.02	0.62	
Signature Not Verified				51828									
Digitally signed by Mudit Impex Private Limited Date: 2021.03.27 11:00:15 Reason: Secure Document Location: India Size and surface: Guaranteed Qualified as Prime quality				For and on behalf of COM LEO Metals Limited 麗寶金屬有限公司 Tehy									

J. Sample MTC/MTR in respect of overseas supplier M/s Sinosteel Shenzhen Co. Ltd.

SINOSTEEL SHENZHEN CO.,LTD.

MILL CERTIFICATE

MFY(FS)21/A

CUSTOMER: SRS STEEL INDUSTRIES
SPEC. /TYPE: J3

CL NO.: MFY210203SD01-2

PRODUCT: EX STOCK COLD ROLLED STAINLESS STEEL COIL J3

CERTIFICATION NO:210203SD01-2

ISSUE DATE: 20210417

PAGE: 1/1

		Specification	QTY	Net Weight	(%)Chemical Composition								TENSILE TEST		HARDNESS		REMARKS
Coil No.	Heat No.	MM	Pkg	KGS	C	Si	Mn	P	S	Cr	Ni	Cu	T.S.	0.2% R.S.	EL	HRB	HV
ZJC-1	D4542	0.19*485	1	3283	0.126	0.420	10.780	0.036	0.003	13.10	0.783	0.583					
ZJC-2	E2454	0.19*485	1	3021	0.130	0.374	10.459	0.021	0.002	13.06	0.766	0.594					
ZJC-3	H1254	0.19*485	1	3184	0.125	0.420	10.780	0.021	0.002	13.04	0.765	0.598					
ZJC-4	H1345	0.19*485	1	3148	0.127	0.413	10.581	0.010	0.002	13.05	0.770	0.603					
ZJC-5	J5455	0.19*485	1	3076	0.129	0.384	10.776	0.029	0.004	13.04	0.774	0.604					
ZJC-6	E5485	0.19*485	1	3143	0.130	0.374	10.459	0.021	0.002	13.06	0.766	0.594					
ZJC-7	H1254	0.19*485	1	3224	0.122	0.413	10.581	0.010	0.002	13.05	0.765	0.591					
ZJC-8	K5485	0.19*550	1	4383	0.125	0.420	10.780	0.021	0.002	13.04	0.765	0.598					
ZJC-9	H1154	0.19*485	1	3196	0.133	0.413	10.581	0.010	0.002	13.06	0.782	0.583					
ZJC-10	A1256	0.19*485	1	3171	0.125	0.420	10.780	0.021	0.002	13.04	0.765	0.598					
ZJC-11	J5485	0.19*485	1	3182	0.130	0.374	10.459	0.021	0.002	13.06	0.766	0.594					
ZJC-12	E1348	0.19*485	1	3321	0.126	0.420	10.780	0.036	0.003	13.10	0.783	0.591					
ZJC-13	X2489	0.19*485	1	3451	0.133	0.413	10.581	0.010	0.002	13.06	0.782	0.583					
ZJC-14	H2656	0.19*550	1	3166	0.129	0.384	10.776	0.029	0.004	13.04	0.774	0.604					
ZJC-15	F0456	0.19*485	1	3154	0.125	0.420	10.780	0.021	0.003	13.11	0.752	0.601					
ZJC-16	V2666	0.19*485	1	3602	0.127	0.413	10.581	0.010	0.002	13.05	0.770	0.603					
TOTAL:			/	16	52707												

REMARKS: 1.EDGE: N-MILL EDGE, C-CUT EDGE
2.NON-RADIATION CONTAMINATION

NOTES: WE HEREBY CERTIFY THAT THE MATERIAL DESCRIBED HEREIN HAS BEEN MANUFACTURED AND TESTED WITH SATISFACTORY RESULT IN ACCORDANCE WITH THE REQUIREMENT OF THE ABOVE MATERIAL SPECIFICATION.

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

K. Sample MTC/MTR in respect of overseas supplier M/s Foshan Chuangshengdian Import And Export Co Ltd.

MILL INSPECTION CERTIFICATE

INVOICE NO:
COMMODITY:
CUSTOMER:

21CSD-SH002
COLD ROLLED STAINLESS STEEL COILS J3 EX STOCK
SADA STEEL IMPEX

CERTIFICATE NO:2021-04-14
DATE OF ISSUE :2021/04/14

SIZE(MM)	COIL	Weight in MT NET	HEAT NO.	Chemical Analysis(%)							
				C	SI	MS	P	S	NI	CR	Cu
0.19X485MM	SI002001	2.845	A1052-01	0.128	0.431	9.570	0.038	0.001	1.27	13.29	0.33
0.19X485MM	SI002002	2.872	A1052-02	0.128	0.449	9.630	0.035	0.001	1.27	13.29	0.33
0.19X485MM	SI002003	2.806	A1052-03	0.128	0.449	9.630	0.035	0.001	1.27	13.29	0.33
0.19X550MM	SI002004	2.159	A1052-04	0.128	0.449	9.600	0.031	0.001	1.27	13.29	0.33
0.19X550MM	SI002005	2.086	A1052-05	0.128	0.474	9.610	0.038	0.001	1.27	13.29	0.33
0.19X550MM	SI002006	2.042	A1052-06	0.128	0.449	9.630	0.035	0.001	1.27	13.28	0.33
0.19X550MM	SI002007	2.178	A1052-07	0.128	0.449	9.630	0.035	0.001	1.27	13.28	0.33
0.19X598MM	SI002008	3.063	A1052-08	0.132	0.449	9.600	0.031	0.001	1.27	13.26	0.33
0.19X598MM	SI002009	2.830	A1052-09	0.132	0.474	9.610	0.038	0.001	1.27	13.26	0.33
0.19X598MM	SI002010	3.407	A1052-10	0.132	0.461	9.600	0.031	0.001	1.27	13.26	0.33
TOTAL	10	26.288									
We hereby certify that the material described herein has been made in accordance with the rules of the contract.				Confirm by							
Test Method : 1.1 Heat Analysis : C,S,N by ASTM E1019-94 Others by ASTM E327-94/E 1086-94 1.2 Tensile Test : ASTM E8M-99											

Signature Not Verified
Digitally signed by Murali Grover
Date: 2021.05.11 18:27:47 IST
Reason: Secure Document
Location: India

L. Sample MTC/MTR in respect of overseas supplier M/s Guangdong Guohao Import And Export Co Ltd.

GUANGDONG GUOHAO IMPORT AND EXPORT CO.,LTD.													
NO. 171 LINGNAN AVENUE NORTH TOSHANZHUANGDONGCHINA													
INSPECTION CERTIFICATE													
Customer: SHANGHAI IMP&EX			Product: CR STEEL ROLL COILS						Date of Issue: 2021/04/14				
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Location: India

广东国昊进出口有限公司
GUANGDONG GUOHAO IMPORT AND EXPORT CO.,LTD.

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

M. Sample MTC/MTR in respect of overseas supplier M/s Foshan International Trade Co. Ltd.

FOSHAN INTERNATIONAL TRADE CO. LTD.															
9/F & 12/F, BLOCK 2, 121 LINGNAN AVENUE NORTH, CHANCHENG DISTRICT, FOSHAN, GUANGDONG, CHINA															
INSPECTION CERTIFICATE															
Customer		SADA STEEL IMPEX				Product		CR STAINLESS STEEL COILS EX STOCK JJ							
Purchaser						Customer Order NO				Date of Issue					
Specification		JJ		Conduct NO		FSPS210365A-4		Certificate NO		09387525602394		Delivery Date		2021/4/6	
NO	Steel, Mat NO	Specification (mm)	Net Weight(KG)	Chemical Composition (wt%) (Heat Analysis)								Tensile Test(Gauge Length=50mm)			Hardness (HRR)
				C	Si	Mn	P	S	Cr	Ni	Cu	Yield Strength (MPa)	Tensile Strength (MPa)	Rear Extension Degree (%)	
1	JJ	0.26*700	3804	0.1248	0.4166	10.5696	0.0324	0.0147	12.5212	1.1284	0.5222	785	785	56	225-230
2	JJ	0.26*700	4012	0.1285	0.4217	10.5456	0.0333	0.0144	12.4255	1.1329	0.5202	785	785	56	225-230
3	JJ	0.26*700	3892	0.1286	0.4121	10.6849	0.0310	0.0134	12.2127	1.0322	0.5203	785	785	56	225-230
4	JJ	0.26*700	3992	0.1287	0.4135	10.4320	0.0352	0.0153	12.5136	1.1749	0.5208	785	785	56	225-230
5	JJ	0.26*700	3772	0.1285	0.4132	10.6849	0.0361	0.0134	12.2886	1.0035	0.5221	785	785	56	225-230
6	JJ	0.26*700	3850	0.1286	0.4122	10.6847	0.0312	0.0137	12.2126	1.0324	0.5223	785	785	56	225-230
7	JJ	0.26*675	3910	0.1255	0.4121	10.7021	0.0393	0.0185	12.2156	1.0396	0.5211	785	785	56	225-230
8	JJ	0.26*485	4154	0.1243	0.4168	10.5639	0.0341	0.0149	12.5213	1.1285	0.5210	785	785	56	225-230
9	JJ	0.26*485	2892	0.1240	0.4115	10.4320	0.0351	0.0153	12.5134	1.1749	0.5209	785	785	56	225-230
10	JJ	0.26*485	3876	0.1241	0.4166	10.5696	0.0324	0.0147	12.5212	1.1284	0.5203	785	785	56	225-230
11	JJ	0.26*485	3962	0.1246	0.4217	10.5456	0.0333	0.0144	12.4254	1.1329	0.5208	785	785	56	225-230
12	JJ	0.26*485	4462	0.1247	0.4121	10.6849	0.0310	0.0134	12.2127	1.0322	0.5201	785	785	56	225-230
13	JJ	0.26*485	3714	0.1241	0.4135	10.4320	0.0352	0.0153	12.5136	1.1749	0.5203	785	785	56	225-230
14	JJ	0.26*485	4290	0.1242	0.4135	10.4320	0.0352	0.0153	12.5136	1.1749	0.5206	785	785	56	225-230
Total			54882												
<div style="display: flex; justify-content: space-between;"> <div> <p>Signature Not Verified</p> <p>IT IS THE CERTIFICATE ALL THE PRODUCT IS QUALIFIED.</p> <p>Digitally signed by Muresh Grover</p> <p>Date: 2021.06.01 21:39:39 IST</p> <p>Reason: Secure Document</p> <p>Location: India</p> </div> <div> <p>SIGNATURE:</p> <p>DATE:</p> </div> </div>															

佛山国贸进出口有限公司
Foshan International Trade Co Ltd

F.No. GEN/ADJ/COMM/660/2025-Adjn
SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

N. Sample MTC/MTR in respect of overseas supplier M/s Shandong
Mengyin Huarun Imp & Exp

工厂检验证明书 MILL TEST CERTIFICATE

品名 (Commodity)	CR STAINLESS STEEL COILS EX STOCK	客户名称 Customer	SADA STEEL IMPEX	山东蒙阴华润进出口有限公司 Shandong Mengyin Huarun Imp and Exp Co., Ltd NO.205 XINCHENG ROAD, MENGYIN COUNTY, JIANYI CITY, SHANDONG PROVINCE, CHINA Tel:18669626822 Fax:0539-4272462												
发票号码 INVOICE NO.:	20P80819	合同号 Contract No.	2020H072403													
标准 (Specification)		证明书号 (Certificate No.):	2020QC081902													
表面加工 (Surface)	2B	开单日期 Issue Date:	AUG.19,2020													
序号	钢卷编号	规格尺寸(mm)	件数(Pcs)	重量(KG)	重量(KG)	炉号	化学成分 Chemical composition %									
No.	Coil No.	Size	Package	Net W.T.	Gross W.T.	Heat No.	C	Si	Mn	P	S	Ni	Cr	Cu	N	
1	20081562	0.32MM X 79.5MM	1	3.256	3.266	F20081562	0.156	0.436	10.44	0.035	0.019	0.81	12.64	0.68	0.089	
2	20081562	0.32MM X 79.5MM	1	3.444	3.454	F20081562	0.156	0.436	10.44	0.035	0.019	0.81	12.64	0.68	0.089	
3	20081562	0.32MM X 79.5MM	1	3.244	3.254	F20081562	0.156	0.436	10.44	0.035	0.019	0.81	12.64	0.68	0.089	
4	20081519	0.32MM X 79.5MM	1	3.286	3.296	F20081519	0.153	0.434	10.52	0.037	0.018	0.81	12.56	0.71	0.09	
5	20081519	0.32MM X 79.5MM	1	3.068	3.078	F20081519	0.153	0.434	10.52	0.037	0.018	0.81	12.56	0.71	0.09	
6	20081519	0.32MM X 79.5MM	1	2.986	2.996	F20081519	0.153	0.434	10.52	0.037	0.018	0.81	12.56	0.71	0.09	
7	20082407	0.26MM X 59.5MM	1	2.526	2.536	F20082407	0.149	0.433	10.52	0.035	0.018	0.82	12.59	0.71	0.087	
8	20082407	0.26MM X 59.5MM	1	2.286	2.296	F20082407	0.149	0.433	10.52	0.035	0.018	0.82	12.59	0.71	0.087	
9	20082407	0.26MM X 59.5MM	1	2.552	2.562	F20082407	0.149	0.433	10.52	0.035	0.018	0.82	12.59	0.71	0.087	
10	20081522	0.50MM X 59MM	1	2.482	2.492	F20081522	0.146	0.435	10.66	0.036	0.017	0.82	12.59	0.72	0.088	
11	20081522	0.50MM X 59MM	1	2.500	2.510	F20081522	0.146	0.435	10.66	0.036	0.017	0.82	12.59	0.72	0.088	
12	20081522	0.50MM X 59MM	1	2.504	2.514	F20081522	0.146	0.435	10.66	0.036	0.017	0.82	12.59	0.72	0.088	
13	20080173	0.50MM X 79MM	1	2.500	2.510	F20080173	0.155	0.435	10.61	0.036	0.019	0.83	12.51	0.70	0.09	
14	20080173	0.50MM X 79MM	1	2.114	2.124	F20080173	0.155	0.435	10.61	0.036	0.019	0.83	12.51	0.70	0.09	

SHANDONG MENGYIN HUARUN
IMP & EXP CO., LTD

15	20080173	0.50MM X 79MM	1	3.404	3.414	F20080173	0.155	0.435	10.61	0.035	0.019	0.83	12.51	0.70	0.09	
16	20080173	0.50MM X 79MM	1	3.416	3.426	F20080173	0.155	0.435	10.61	0.035	0.019	0.83	12.51	0.70	0.09	
17	20080166	0.50MM X 79MM	1	3.406	3.416	F20080166	0.148	0.437	10.47	0.038	0.017	0.81	12.59	0.69	0.089	
18	20080166	0.50MM X 79MM	1	2.510	2.520	F20080166	0.148	0.437	10.47	0.038	0.017	0.81	12.59	0.69	0.089	
19	20080166	0.50MM X 79MM	1	2.510	2.520	F20080166	0.148	0.437	10.47	0.038	0.017	0.81	12.59	0.69	0.089	
20	20080166	0.50MM X 79MM	19	53.954	54.144											

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F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

O. Sample MTC/MTR in respect of overseas supplier M/s Foshan
Chuangshengdian Import And Export Co Ltd.

MILL INSPECTION CERTIFICATE


VOICE NO: 20CSD-S1001-2 CERTIFICATE NO: 2020-12-25
 MODITY: COLD ROLLED STAINLESS STEEL COILS J3 EX STOCK DATE OF ISSUE : 2020/12/25
 CUSTOMER: SADA STEEL IMPEX

SIZE(MM)	COIL	Weight in MT NET	HEAT NO.	Chemical Analysis(%)							
				C	SI	M _N	P	S	NI	CR	Cu
0.26X435MM	S1001019	4.670	A1051-19	0.128	0.431	9.570	0.038	0.001	1.27	13.29	0.33
0.26X445MM	S1001020	3.931	A1051-20	0.128	0.449	9.630	0.035	0.001	1.27	13.29	0.33
0.26X440MM	S1001021	3.522	A1051-21	0.128	0.449	9.630	0.035	0.001	1.27	13.29	0.33
0.26X440MM	S1001022	3.999	A1051-22	0.128	0.449	9.600	0.031	0.001	1.27	13.29	0.33
0.26X450MM	S1001023	3.794	A1051-23	0.128	0.474	9.610	0.038	0.001	1.27	13.29	0.33
0.26X450MM	S1001024	3.924	A1051-24	0.128	0.449	9.630	0.035	0.001	1.27	13.28	0.33
0.26X475MM	S1001025	3.523	A1051-25	0.128	0.449	9.630	0.035	0.001	1.27	13.28	0.33
0.26X475MM	S1001026	3.579	A1051-26	0.132	0.449	9.600	0.031	0.001	1.27	13.26	0.33
0.26X510MM	S1001027	3.740	A1051-27	0.132	0.474	9.610	0.038	0.001	1.27	13.26	0.33
0.26X510MM	S1001028	3.910	A1051-28	0.132	0.461	9.600	0.031	0.001	1.27	13.26	0.33
0.26X520MM	S1001029	2.693	A1051-29	0.132	0.474	9.610	0.038	0.001	1.25	13.32	0.33
0.26X520MM	S1001030	2.733	A1051-30	0.130	0.449	9.630	0.035	0.001	1.25	13.32	0.33
0.26X520MM	S1001031	2.753	A1051-31	0.130	0.449	9.630	0.035	0.001	1.25	13.32	0.33
0.26X530MM	S1001032	2.522	A1051-32	0.130	0.461	9.600	0.031	0.001	1.25	13.32	0.33
0.26X570MM	S1001033	4.720	A1051-33	0.130	0.474	9.610	0.038	0.001	1.25	13.32	0.33
TOTAL	15	54.013									

We hereby certify that the material described herein has been made in accordance with the rules of the contract.

Test Method :
 1.1 Heat Analysis : C.S.N by ASTM E1019-94 Others by ASTM E327-94/E 1086-94
 1.2 Tensile Test : ASTM E8M-99

Confirm by



F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

P. Sample MTC/MTR in respect of overseas supplier M/s Shandong Mengyin Huarun Imp & Exp

工厂检验证明书
MILL TEST CERTIFICATE

山东蒙阴华润进出口有限公司
SHANDONG MENGYIN HUARUN IMP. AND EXP. CO., LTD.
NO.205 XINCHENG ROAD,MENGYIN COUNTY,SHANDONG,CHINA
TEL:0086-18669626822 FAX:0086-539-4272462

品名 (Commodity)			COLD ROLLED STAINLESS STEEL COILS EX STOCK J3				客户名称: Customer		SADA STEEL IMPEX							
表面加工 (Surface)			2B				合同号: Contract No.		2020HR120901							
发票号: Invoice No.			20PB1226				开单日期: Issue Date		DEC.26,2020							
序号	卷号	规格尺寸(mm)	件数(Pcs)	重量(kg)	重量(kg)	炉号	化学成分 Chemical composition %									
No.	Coil No.	Size	Package	Net W.T.	Gross W.T.	Heat No.	C	Si	Mn	P	S	Ni	Cr	Cu	N	
1	TA20-12-260	0.26MMX59.5MM	1	4075	4095	GYTA20-12-260	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087	
2	TA20-12-260	0.26MMX59.5MM	1	4010	4030	GYTA20-12-260	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087	
3	TA20-12-257	0.50MMX59.79MM	1	4105	4125	GYTA20-12-257	0.148	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087	
4	TA20-12-274	0.30MMX79.5MM	1	3695	3715	GYTA20-12-274	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
5	TA20-12-274	0.30MMX79.5MM	1	3665	3685	GYTA20-12-274	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
6	TA20-12-275	0.30MMX79.5MM	1	3895	3915	GYTA20-12-275	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
7	TA20-12-275	0.30MMX79.5MM	1	3730	3750	GYTA20-12-275	0.146	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
8	TA20-12-333	0.50MMX59.79MM	1	3570	3590	GYTA20-12-333	0.148	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
9	TA20-12-237	0.50MMX59.79MM	1	3900	3920	GYTA20-12-237	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087	
10	TA20-12-237	0.50MMX59.79MM	1	4035	4055	GYTA20-12-237	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087	
11	TA20-12-259	0.50MMX59.79MM	1	4045	4065	GYTA20-12-259	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
12	TA20-12-259	0.50MMX59.79MM	1	3960	3980	GYTA20-12-259	0.147	0.434	10.56	0.036	0.019	1.05	12.61	0.69	0.089	
13	TA20-12-296	0.26MMX59.5MM	1	3525	3545	GYTA20-12-296	0.149	0.432	10.56	0.034	0.018	1.01	12.66	0.68	0.087	
14	TA20-12-257	0.50MMX59.79MM	1	3960	3980	GYTA20-12-257	0.148	0.432	10.56	0.034	0.018	1.02	12.66	0.68	0.087	
			14	54170	54450											

本产品已按上述要求进行了制造和检验，其结果符合要求，特此证明。

WE HEREBY CERTIFY THAT MATERIAL DESCRIBED HEREIN HAS MANUFACTURED AND TESTED WITH SATISFACTORY RESULTS IN ACCORDANCE WITH THE REQUIREMENTS OF THE ABOVE MATERIAL SPECIFICATION.

13.6 Examination of the above Mill Test Certificates (MTC) uploaded by M/s Sada Steel Impex issued by the overseas suppliers for “Cold Rolled Stainless Steel strips/Coil Grade J3” contained Nickel content less than 1.5% and Chromium less than 16%, which in comparison with the chemical composition of Austenitic Stainless Steel of Nickel Chromium type, is much less. Therefore, Cold Rolled Stainless Steel Coils of J3 grade is not Nickel Chromium Austenitic type and cannot be classified as Nickel Chromium Austenitic type.

13 A. VOLUNTARY STATEMENTS RECORDED UNDER SECTION 108 OF THE CUSTOMS ACT 1962:

During the investigation, statements of following persons were recorded under section 108 of the customs act 1962, in relation to misclassification of imported goods to wrongfully avail duty benefits by M/s Sada Steel Impex:

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

TABLE-13

S. No	Name of person (Shri/Ms./Smt)	Relationship	Date of Statement	RUDs No
1	Arjun Guglani, Partner M/s Total Cargo Service	He purchased goods on High Sea sales basis from M/s Sada Steel Impex and had filed the Bill of Entry before Indian Customs	11.09.2025	Rud No 42
2	Mukesh Grover (CHA, F-Card Holder) (R- 13/2006) Prop. of M/s Mukesh Grover	He, as CHA, filed all documents and cleared consignments of M/s Sada Steel before Indian Customs.	11.09.2025	Rud No 43

i) Statement dated 11.09.2025 of Shri Mukesh Grover (CHA, F-Card Holder) Prop. of M/s Mukesh Grover, recorded under Sec 108 of Customs Act, wherein inter-alia he stated the following: (RUD No 43)

- That he has been providing Customs Clearance Services to M/s Sada Steel Impex for clearing import consignments of Cold rolled Stainless Steel; that he used to receive customs documents from Shri Atul Kishore Guglani Partner in M/s Choice Cargo agencies Pvt Ltd.
- That he did not know the process of manufacturing of stainless-steel coil; that the impugned goods are used in the production of making utensils.
- That as per BIS certificate (ISI 6911: 1992), the chemical composition of the Austenitic steel 201 grade is as under:

Numerical symbol ISS/Grade	C	Si	Mn	Ni	Cr	Mo	S max	P max	Others
	.20 max	1.0 max	4.0-8.0	3.5-5.5	16.0-18.0	-	0.030	0.045	N 0.05-0.2

- That as per Mill Test Certificates submitted by M/s Sada Steel Impex the chemical composition range is as below:

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

Elements	C	Mn	S	P	Si	Ni	Cr	Cu
Composition	0.122-	10.45-	0.002-	0.021-	0.33-	0.75-	13.04-	0.58-
in %	0.143	10.68	0.004	0.0454	0.42	1.46	13.6	0.77

- That as per BIS certificate (ISI 6911: 1992), to qualify the category of Nickel Chromium austenitic type under CTH 72209022, the chemical composition of the Nickel (Cr) and Chromium (Cr) shall be in the range of 3.5 to 5.5 and 16 to 18 respectively; that however, in case of M/s Sada Steel Impex the chemical composition of the NI and CR falls in range of 0.75 to 1.46 and 13.04 to 13.6; that, therefore the goods imported by M/s Sada Steel Impex do not qualify to be “Austenitic steel” type and therefore do not merit classification under CTH 72209022.
- That as per BIS certificate (ISI 6911: 1992) the prescribed content of Nickel (Ni) and Chromium (Cr) are higher and goods imported by M/s Sada Steel Impex, had lower concentration of Nickel (Ni) and Chromium (Cr).
- That as per the above documents it appears as the goods imported by M/s Sada Steel Impex do not qualify to be “Austenitic steel” type, therefore they do not merit classification under CTH 72209022, and therefore the importer had misclassified the goods under wrong CTH;
- that he was not aware about the IS 6911:1992 and chemical composition of the Stainless Steel prescribed by it, that’s why he had submitted the Customs documents with incorrect classification.

ii) Statement dated 11.09.2025 of Sh. Atul Kishore Guglani, Director of M/s Choice Cargo Agency Pvt. Ltd. was recorded under Sec 108 of Customs Act, wherein inter-alia he stated the following: (RUD No 42)

- That he had been providing custom clearance to M/s Sada Steel Impex from his firm M/s Choice Cargo agencies Pvt Ltd, which he outsourced to Shri Mukesh Grover proprietor of M/s Mukesh Grover;
- That he did not know the process of manufacturing of stainless-steel coil; that, however, the goods imported i.e cold rolled steel coils are used in the production of making utensils;
- That as per BIS certificate (ISI 6911: 1992), the chemical composition of the Austenitic steel 201 grade is as under:

Numerical symbol ISS/Grade	C	Si	Mn	Ni	Cr	Mo	S max	P max	Others

F.No. GEN/ADJ/COMM/660/2025-Adjn

SCN No- 25/2025-26/COMM/N.S/ADJN/MCH

	.20 max	1.0 max	4.0-8.0	3.5-5.5	16.0-18.0	-	0.030	0.045	N 0.05- 0.2
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- That as per Mill Test Certificates submitted by M/s Sada Steel Impex the chemical composition range is as below:

Elements	C	Mn	S	P	Si	Ni	Cr	Cu
Composition in %	0.122- 0.143	10.45- 10.68	0.002- 0.004	0.021- 0.0454	0.33- 0.42	0.75- 1.46	13.04- 13.6	0.58- 0.77

- That as per BIS certificate (ISI 6911: 1992), to qualify the category of Nickel Chromium austenitic type under CTH 72209022, the chemical composition of the Nickel (Cr) and Chromium (Cr) shall be in the range of 3.5 to 5.5 and 16 to 18 respectively; that however, in case of M/s Sada Steel Impex the chemical composition of the NI and CR falls in range of 0.75 to 1.46 and 13.04 to 13.6; that, therefore the goods imported by M/s Sada Steel Impex do not qualify to be “Austenitic steel” type and therefore do not merit classification under CTH 72209022.
- That as per BIS certificate (ISI 6911: 1992) the prescribed content of Nickel (Ni) and Chromium (Cr) are higher and goods imported by M/s Sada Steel Impex, had lower concentration of Nickel (Ni) and Chromium (Cr).
- that he was not aware about the IS 6911:1992 and chemical composition of the Stainless Steel prescribed by it, that’s why he had submitted the Customs documents with incorrect classification.

14. CORRECT CLASSIFICATION OF IMPORTED GOODS I.E. COLD ROLLED STAINLESS STEEL OF -J3 GRADE:

Classification of import/export goods is governed by the Indian Customs Tariff Act, 1975. The first Schedule specifies the nomenclature that is based on the Harmonized Commodity Description and Coding System generally referred to as “Harmonized System Nomenclature” or simply “HSN”, developed by the World Customs Organization (WCO), which is applied uniformly for international trade all over the world.

On Examination of Mill Test Certificates as discussed in Para supra, it is ascertained that M/s Sada Steel Impex imported goods i.e. “Cold Rolled Stainless Steel Coil grade J3” -which do not contain Ni and Cr as prescribed under IS 6991:1992 and do not merit classification under Tariff heading of Austenitic Stainless Steel of Chromium and Nickel type. Further, M/s Sada Steel Impex have not correctly mentioned the description of the imported goods at the time of filing of Bills of Entry and have-not mentioned the

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imported items as 'Nickel chromium austenitic type', rather it has indicated a generic description as 'Cold Rolled Stainless Steel Coils Ex Stock'. This indicated mala fide intention to wrongly avail the benefits of concessional duty under notification 50/2018- Customs which was available in respect of nickel Chromium austenitic type Steel (CTH 72209022). Therefore, since the impugned goods are not Nickel Chromium Austenitic Type and the description of goods mentioned is too generic, the impugned goods merit classification in the 'others' category i.e. CTH 7220 9090. Thus, the correct classification of the impugned goods i.e. "Cold Rolled Stainless Steel Coil grade J3" appears to be under CTH 7220 9090 and not under CTH 7220 9022, as declared by the importer. Further, concessional rate of Basic Customs Duty as availed by M/s Sada Steel Impex under S. No.734 of Notification No.50/2018-Customs dated 30.06.2018 available for Austenitic Stainless Steel of Chromium and Nickel type under CTH 7220 9022, appears not available for the impugned imported goods i.e. "Cold Rolled Stainless Steel Coil grade J3" as the correct classification of the impugned goods appears to be under CTH 7220 9090. Therefore, benefit of concessional rate of Basic Customs Duty availed by the M/s Sada Steel Impex under S. No.734 of Notification No.50/2018-Customs dated 30.06.2018 appears to have been taken incorrectly.

15. SUMMARY OF INVESTIGATION:

Thus, investigation of all the evidences retrieved, statements recorded, brought out following offences, by M/s Sada Steel Impex and M/s Jenni Enterprises, which are as under:

1. Under-Valuation in importation of Cold Rolled Stainless Steel Coils/strip (Ex Stock) by M/s Sada Steel Impex (IEC-AYHPG1590N) and M/s Jenni Enterprises (IEC CXKPK6240H);
2. Mis-classification of Cold Rolled Stainless Steel (Ex Stock) coils of J3 Grade under CTH 7220 9022 to avail undue benefits under S. No.734 of Notification No. 50/2018 – Customs dated 30.06.2018 by M/s Sada Steel Impex.

The main points of investigation have been summarised below:

15.1 Under-valuation in import of Cold Rolled Stainless Steel coils (Ex stock) by M/s Sada Steel Impex (Proprietorship of Shri Amit Gupta) and M/s Jenni Enterprises (Proprietorship of Shri Dheeraj Kumar Rao):

Investigation revealed that the firms namely M/s Sada Steel Impex and M/s Jenni Enterprises were engaged in under-valuation in import of Cold Rolled

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Stainless Steel coils, from China; that Shri Amit Gupta had an active role in imports made by M/s Jenni Enterprises, as revealed in the statements of Domestic buyers namely Shri Gaurav Khurana (Proprietor of M/s AG Enterprises), Shri Kartik Gupta (Proprietor of M/s M K Industries) and Shri Rakesh Sharma (Proprietor of M/s M K Overseas) and CHA (namely Sh. Atul Kishore Guglani and Sh Mukesh Grover) ; that Modus-operandi emerged to have been used by these firms , was to declare the impugned goods at under-valued price by using fake/fabricated Invoices –with lower-value, before Indian Customs to evade appropriate duty.

15.2 Purchase of the impugned goods by M/s Sada Steel Impex (Proprietorship of Shri Amit Gupta) and M/s Jenni Enterprises (Proprietorship of Shri Dheeraj Kumar Rao) from suspected Common Chinese Suppliers:

Investigation and analysing the past import data, revealed that from year 2020 onwards, M/s Sada Steel Impex imported the impugned goods i.e. Cold Rolled Stainless Steel Coil (of different Grads) from various Chinese suppliers who had a doubtful history of issuing fabricated under-valued invoices namely M/S FIA INTERNATIONAL TRADING CO. LTD, M/S GUANGDONG GUANGXIN GOLDTEC HOLDINGS, M/S HONGKONG WINNER STEEL CO., LIMITED, M/S JIAYAO (HONGKONG) INTERNATIONAL GROUP LIMITED, M/S LEO METALS LIMITED, M/S MFY METAL COMPANY LIMITED etc.

Similarly, M/s Jenni Enterprises imported the impugned goods i.e. Cold Rolled Stainless Steel Coil (of different Grads) from various Chinese suppliers who had a doubtful history of issuing fabricated under-valued invoices namely M/S FOSHAN XUANZHENG TRADING CO., Ltd., M/S LEO METALS LIMITED, M/S MFY METAL COMPANY LIMITED, M/S JIAYAO (HONGKONG) INTERNATIONAL GROUP.

In the past investigations, genuine invoices-with actual prices of goods, have been retrieved, issued by such Chinese suppliers, in which under-valuation in import has been corroborated by price comparison with corresponding Customs Invoices declared which was found to be lower than genuine invoices.

15.3 Resemblance of Pattern of the transaction value Declared By M/s Sada Steel Impex (Proprietorship of Shri Amit Gupta) and M/s Jenni Enterprises (Proprietorship of Shri Dheeraj Kumar Rao), which was found to be Under-Valued in previous investigations:

Examination of transaction value declared by M/s Sada Steel Impex and M/s Jenni Enterprises for the impugned goods i.e. Cold Rolled Stainless Steel (of

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different grade), shows resemblance with the transaction value found to be undervalued in investigations conducted by DRI in import of cold rolled stainless steel. On analysis of import data of M/s Sada Steel Impex, it emerged that transaction value declared for the impugned goods i.e. Cold Rolled Stainless Steel (grade J2 & J3) at a price range of USD 0.75 to 1.1 per KG & USD 1.1 per KG respectively. Further, on analysis of import data of M/s JENNI ENTERPRISES, it emerged that the transaction value declared for the goods i.e Cold Rolled Stainless Steel (grade J3) was at a price range of USD 0.75 to 0.85 per KG.

In addition, the above transaction value were also found lower than the "Minimum value" of USD 1.14 per KG for J3 grade and USD 1.244 per Kg for Grade J2 (discussed in previous para) which emerged to be under-valued price as per the investigation conducted by DRI as discussed in para supra. Thus, the imports made by M/S SADA STEEL IMPEX and M/S JENNI ENTERPRISES in the past (2020 onwards), of the impugned goods i.e. Cold Rolled Stainless Steel (Grade J3 & Grade J2), also appear to be under-valued.

15.4 Wrongful availment of duty benefits under S.NO.734 Of Notification No. 50/2018-customs dated 30.06.2018 by M/S Sada Steel Impex:

M/s Sada Steel Impex has not correctly mentioned the description of the imported goods at the time of filing of Bills of Entry and have-not mentioned the imported items as 'Nickel chromium austenitic type', rather they have indicated a generic description as 'Cold Rolled Stainless Steel Coils Ex Stock'. This indicate mala fide intention to wrongly avail the benefits of concessional duty under notification 50/2018- Customs which was available in respect of nickel Chromium austenitic type Steel (CTH 72209022). Further, on examination of Mill Test Certificate (MTC), also known as a Mill Certificate or a Material Test Report (MTR), submitted by the firm, it was noticed that the content of Nickel (Ni) and Chromium (Cr) in the imported goods (Cold Rolled Stainless Steel Coil of J3 grade) was not found as per specification required to qualify in any of the two subgroups (200 & 300 Series) of Austenitic stainless steel. Basis the evidence gathered and statement recorded, the correct classification of the impugned goods i.e. "Cold Rolled Stainless Steel Coil grade J3" appears to be under CTH 7220 9090 and not under CTH 7220 9022, as declared by the importer. Thus, 45% concession on Basic Customs Duty under S. No.734 of Notification No. 50/2018 – Customs dated 30.06.2018 availed by firms namely M/s Sada Steel Impex appears to be wrongly availed.

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15.5 Non-compliance and failure to participate in the investigation by Shri Amit Gupta (Proprietor of M/s Sada Steel Impex) and Shri Dheeraj Kumar Rao (Proprietor of M/s Jenni Enterprises):

Despite issuing many summonses and giving opportunity to Shri Amit Gupta (Proprietor of M/s Sada Steel Impex) and Shri Dheeraj Kumar Rao (Proprietor of M/s Jenni Enterprises), to join the investigation, no one preferred to join investigation till date. Failure to join the investigation by the above persons, even after lapse of more than one year, clearly suggests their intention to evade scrutiny and accountability. Such behaviour also raises the presumption of guilt and implies that by avoiding the investigation, the individuals indirectly indicate involvement in the alleged offense, as an innocent person would typically cooperate with the enforcement authorities to indicate their innocence. Further, refusal to participate demonstrates an attempt to escape the investigative process, potentially to conceal incriminating evidence or facts. The absence of cooperation also suggests that the individuals lack credible arguments or evidence to defend themselves, further solidifying the perception of culpability. In addition, non-cooperation reinforces the investigating agency's position, indicating that they possess substantial evidence to establish guilt, making it unnecessary for the accused to provide further inputs. Further, non-compliance on part of accused could also be viewed as obstruction of justice and can strengthen the case against the non-compliant individual. Also, for this non-compliance to summons, a complaint for offences punishable under section 174 of the Indian Penal Code has been filed in Court of Law, against Shri Amit Gupta and Shri Dheeraj Kumar Rao. The matter is sub judice.

15.6 Statements recorded under Section 108 of the Customs Act 1962 of High Sea Sale buyer, Domestic buyers of M/s Sada Steel Impex and M/s Jenni Enterprises:

Shri Arjun Guglani, Partner M/s Total Cargo Service who had purchased goods on High Sea sales basis from M/s Sada Steel Impex, had accepted under-valuation in the consignment under invoice No. TY 2202V3812 dated 07.09.2022(i.e the invoice pertaining to importation of impugned good by M/s Sada Steel Impex). Shri Arjun Guglani, Partner M/s Total Cargo Service had also accepted that he got this genuine and fabricated invoices from Shri Amit Gupta (Proprietor of M/s Sada Steel Impex) and that he had declared this fake invoices before Indian Customs. Further, it has also been observed that the sets of parallel Invoices shown to him were used as modus-operandi to declare imported goods at lower value to evade Customs duty. Further, Domestic buyers of M/s Sada Steel Impex and M/s Jenni Enterprises confirmed active role of Shri Amit Gupta in day-to-day

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operations of both firms (i.e. M/s Sada Steel Impex and M/s Jenni Enterprises).

16. LEGAL PROVISIONS:

A) Section 2 (39) of Customs Act defines "smuggling", in relation to any goods, means any act or omission which will render such goods liable to confiscation under section 111 or section 113;

B) (26) "importer" in relation to any goods at any time between their importation and the time when they are cleared for home consumption, includes [any owner, beneficial owner] or any person holding himself out to be the importer;

C) Section 14: Valuation of goods.

(1) For the purposes of the Customs Tariff Act, 1975 (51 of 1975), or any other law for the time being in force, the value of the imported goods and export goods shall be the transaction value of such goods, that is to say, the price actually paid or payable for the goods when sold for export to India for delivery at the time and place of importation, or as the case may be, for export from India for delivery at the time and place of exportation, where the buyer and seller of the goods are not related and price is the sole consideration for the sale subject to such other conditions as may be specified in the rules made in this behalf:

Provided that such transaction value in the case of imported goods shall include, in addition to the price as aforesaid, any amount paid or payable for costs and services, including commissions and brokerage, engineering, design work, royalties and licence fees, costs of transportation to the place of importation, insurance, loading, unloading and handling charges to the extent and in the manner specified in the rules made in this behalf:

Provided further that the rules made in this behalf may provide for,-

(i) the circumstances in which the buyer and the seller shall be deemed to be related;

(ii) the manner of determination of value in respect of goods when there is no sale, or the buyer and the seller are related, or price is not the sole consideration for the sale or in any other case;

(iii) the manner of acceptance or rejection of value declared by the importer or exporter, as the case may be, where the proper officer has reason to doubt the truth or accuracy of such value, and determination of value for the purposes of this section:

Provided also that such price shall be calculated with reference to the rate of exchange as in force on the date on which a bill of entry is presented under section 46, or a shipping bill of export, as the case may be, is presented under section 50.

(2) Notwithstanding anything contained in sub-section (1), if the Board is satisfied that it is necessary or expedient so to do, it may, by notification in the

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Official Gazette, fix tariff values for any class of imported goods or export goods, having regard to the trend of value of such or like goods, and where any such tariff values are fixed, the duty shall be chargeable with reference to such tariff value.

Explanation.-For the purposes of this section-

(a) "rate of exchange" means the rate of exchange-

(i) determined by the Board, or

(ii) ascertained in such manner as the Board may direct, for the conversion of Indian currency into foreign currency or foreign currency into Indian currency;

(b) "foreign currency" and "Indian currency" have the meanings respectively assigned to them in clause (m) and clause (q) of section 2 of the Foreign Exchange Management Act, 1999 (42 of 1999).

D] Section 28. Recovery of duties not levied or not paid or short-levied or short-paid] or erroneously refunded. –

(1) Where any duty has not been levied or not paid or short-levied or short-paid] or erroneously refunded, or any interest payable has not been paid, part-paid or erroneously refunded, for any reason other than the reasons of collusion or any willful mis-statement or suppression of facts,-

(a) the proper officer shall, within two years from the relevant date, serve notice on the person chargeable with the duty or interest which has not been so levied or paid or which has been short-levied or short-paid or to whom the refund has erroneously been made, requiring him to show cause why he should not pay the amount specified in the notice;

Provided *that before issuing notice, the proper officer shall hold pre-notice consultation with the person chargeable with duty or interest in such manner as may be prescribed;*

(b) the person chargeable with the duty or interest, may pay before service of notice under clause (a) on the basis of,-

(i) his own ascertainment of such duty; or

(ii) the duty ascertained by the proper officer,

the amount of duty along with the interest payable thereon under section 28AA or the amount of interest which has not been so paid or part-paid.

7[Provided *that the proper officer shall not serve such show cause notice, where the amount involved is less than rupees one hundred.]*

(2) The person who has paid the duty along with interest or amount of interest under clause (b) of sub-section (1) shall inform the proper officer of such payment in writing, who, on receipt of such information, shall not serve any

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notice under clause (a) of that sub-section in respect of the duty or interest so paid or any penalty leviable under the provisions of this Act or the rules made thereunder in respect of such duty or interest:

Provided *that where notice under clause (a) of sub-section (1) has been served and the proper officer is of the opinion that the amount of duty along with interest payable thereon under section 28AA or the amount of interest, as the case may be, as specified in the notice, has been paid in full within thirty days from the date of receipt of the notice, no penalty shall be levied and the proceedings against such person or other persons to whom the said notice is served under clause (a) of sub-section (1) shall be deemed to be concluded.*

(3) Where the proper officer is of the opinion that the amount paid under clause (b) of sub-section (1) falls short of the amount actually payable, then, he shall proceed to issue the notice as provided for in clause (a) of that sub-section in respect of such amount which falls short of the amount actually payable in the manner specified under that sub-section and the period of 9[two years] shall be computed from the date of receipt of information under sub-section (2).

(4) Where any duty has not been 10[levied or not paid or has been short-levied or short-paid] or erroneously refunded, or interest payable has not been paid, part-paid or erroneously refunded, by reason of,-

(a) collusion; or

(b) any wilful mis-statement; or

(c) suppression of facts,

by the importer or the exporter or the agent or employee of the importer or exporter, the proper officer shall, within five years from the relevant date, serve notice on the person chargeable with duty or interest which has not been 11[so levied or not paid] or which has been so short-levied or short-paid or to whom the refund has erroneously been made, requiring him to show cause why he should not pay the amount specified in the notice.

(5) Where any 12[duty has not been levied or not paid or has been short-levied or short paid] or the interest has not been charged or has been part-paid or the duty or interest has been erroneously refunded by reason of collusion or any wilful mis-statement or suppression of facts by the importer or the exporter or the agent or the employee of the importer or the exporter, to whom a notice has been served under sub-section (4) by the proper officer, such person may pay the duty in full or in part, as may be accepted by him, and the interest payable thereon under section 28AA and the penalty equal to 13 [fifteen per cent.] of the duty specified in the notice or the duty so accepted by that person, within thirty days of the receipt of the notice and inform the proper officer of such payment in writing.

(6) Where the importer or the exporter or the agent or the employee of the importer or the exporter, as the case may be, has paid duty with interest and penalty under sub-section (5), the proper officer shall determine the amount of duty or interest and on determination, if the proper officer is of the opinion-

(i) that the duty with interest and penalty has been paid in full, then, the proceedings in respect of such person or other persons to whom the notice is served under sub-section (1) or sub-section (4), shall, without prejudice to the provisions of sections 135, 135A and 140 be deemed to be conclusive as to the matters stated therein; or

(ii) that the duty with interest and penalty that has been paid falls short of the amount actually payable, then, the proper officer shall proceed to issue the notice as provided for in clause (a) of sub-section (1) in respect of such amount which falls short of the amount actually payable in the manner specified under that sub-section and the period of 14 [two years] shall be computed from the date of receipt of information under sub-section (5).

(7) In computing the period of two years referred to in clause (a) of sub-section (1) or five years referred to in sub-section (4), the period during which there was any stay by an order of a court or tribunal in respect of payment of such duty or interest shall be excluded.

(7A). Save as otherwise provided in clause (a) of sub-section (1) or in sub-section (4), the proper officer may issue a supplementary notice under such circumstances and in such manner as may be prescribed, and the provisions of this section shall apply to such supplementary notice as if it was issued under the said sub section (1) or sub-section (4).]

(8) The proper officer shall, after allowing the concerned person an opportunity of being heard and after considering the representation, if any, made by such person, determine the amount of duty or interest due from such person not being in excess of the amount specified in the notice.

(9) The proper officer shall determine the amount of duty or interest under sub-section (8),-

(a) within six months from the date of notice, 17 [***] in respect of cases falling under clause (a) of sub- section (1);

(b) within one year from the date of notice, 17 [***] in respect of cases falling under sub-section (4).

Provided that where the proper officer fails to so determine within the specified period, any officer senior in rank to the proper officer may, having regard to the circumstances under which the proper officer was prevented from determining the amount of duty or interest under sub-section (8), extend the period specified

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in clause (a) to a further period of six months and the period specified in clause (b) to a further period of one year:

Provided further that where the proper officer fails to determine within such extended period, such proceeding shall be deemed to have concluded as if no notice had been issued.

(9A) Notwithstanding anything contained in sub-section (9), where the proper officer is unable to determine the amount of duty or interest under sub-section (8) for the reason that-

(a) an appeal in a similar matter of the same person or any other person is pending before the Appellate Tribunal or the High Court or the Supreme Court; or

(b) an interim order of stay has been issued by the Appellate Tribunal or the High Court or the Supreme Court; or

(c) the Board has, in a similar matter, issued specific direction or order to keep such matter pending; or

(d) the Settlement Commission has admitted an application made by the person concerned, the proper officer shall inform the person concerned the reason for non determination of the amount of duty or interest under sub-section (8) and in such case, the time specified in sub-section (9) shall apply not from the date of notice, but from the date when such reason ceases to exist.]

(10) Where an order determining the duty is passed by the proper officer under this section, the person liable to pay the said duty shall pay the amount so determined along with the interest due on such amount whether or not the amount of interest is specified separately.

(10A) Notwithstanding anything contained in this Act, where an order for refund under sub-section (2) of section 27 is modified in any appeal and the amount of refund so determined is less than the amount refunded under said sub-section, the excess amount so refunded shall be recovered along with interest thereon at the rate fixed by the Central Government under section 28AA, from the date of refund up to the date of recovery, as a sum due to the Government.

(10B) A notice issued under sub-section (4) shall be deemed to have been issued under sub-section (1), if such notice demanding duty is held not sustainable in any proceeding under this Act, including at any stage of appeal, for the reason that the charges of collusion or any wilful mis-statement or suppression of facts to evade duty has not been established against the person to whom such notice was issued and the amount of duty and the interest thereon shall be computed accordingly.

11 Notwithstanding anything to the contrary contained in any judgement, decree or order of any court of law, tribunal or other authority, all persons appointed as officers of Customs under sub-section (1) of section 4 before the

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6th day of July, 2011 shall be deemed to have and always had the power of assessment under section 17 and shall be deemed to have been and always had been the proper officers for the purposes of this section.]

Explanation 1 . - *For the purposes of this section, "relevant date" means,-*

(a) in a case where duty is 21[not levied or not paid or short-levied or short-paid], or interest is not charged, the date on which the proper officer makes an order for the clearance of goods;

(b) in a case where duty is provisionally assessed under section 18, the date of adjustment of duty after the final assessment thereof or re-assessment, as the case may be;

(c) in a case where duty or interest has been erroneously refunded, the date of refund;

(d) in any other case, the date of payment of duty or interest.

Explanation 2 . - *For the removal of doubts, it is hereby declared that any non-levy, short-levy or erroneous refund before the date on which the Finance Bill, 2011 receives the assent of the President, shall continue to be governed by the provisions of section 28 as it stood immediately before the date on which such assent is received.]*

22[Explanation 3 . - *For the removal of doubts, it is hereby declared that the proceedings in respect of any case of non-levy, short-levy, non-payment, short-payment or erroneous refund where show cause notice has been issued under sub-section (1) or sub-section (4), as the case may be, but an order determining duty under sub-section (8) has not been passed before the date on which the Finance Bill, 2015 receives the assent of the President, shall, without prejudice to the provisions of sections 135, 135A and 140, as may be applicable, be deemed to be concluded, if the payment of duty, interest and penalty under the proviso to sub-section (2) or under sub-section (5), as the case may be, is made in full within thirty days from the date on which such assent is received.]*

23[Explanation 4 - *For the removal of doubts, it is hereby declared that notwithstanding anything to the contrary contained in any judgment, decree or order of the Appellate Tribunal or any Court or in any other provision of this Act or the rules or regulations made thereunder, or in any other law for the time being in force, in cases where notice has been issued for non-levy, short-levy, non-payment, short payment or erroneous refund, prior to the 29th day of March, 2018 (13 of 2018), being the date of commencement of the Finance Act, 2018, such notice shall continue to be governed by the provisions of section 28 as it stood immediately before such date.]*

F) Section 28AA. Interest on delayed payment of duty. –

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- (1) Notwithstanding anything contained in any judgment, decree, order or direction of any court, Appellate Tribunal or any authority or in any other provision of this Act or the rules made thereunder, the person, who is liable to pay duty in accordance with the provisions of section 28, shall, in addition to such duty, be liable to pay interest, if any, at the rate fixed under sub-section (2), whether such payment is made voluntarily or after determination of the duty under that section.
- (2) Interest at such rate not below ten per cent. and not exceeding thirty-six per cent. per annum, as the Central Government may, by notification in the Official Gazette, fix, shall be paid by the person liable to pay duty in terms of section 28 and such interest shall be calculated from the first day of the month succeeding the month in which the duty ought to have been paid or from the date of such erroneous refund, as the case may be, up to the date of payment of such duty.
- (3) Notwithstanding anything contained in sub-section (1), no interest shall be payable where,-
- (a) the duty becomes payable consequent to the issue of an order, instruction or direction by the Board under section 151A; and
- (b) such amount of duty is voluntarily paid in full, within forty-five days from the date of issue of such order, instruction or direction, without reserving any right to appeal against the said payment at any subsequent stage of such payment.]

G.) Section 46. Entry of goods on importation. -

(1) The importer of any goods, other than goods intended for transit or transshipment, shall make entry thereof by presenting electronically on the customs automated system to the proper officer a bill of entry for home consumption or warehousing in such form and manner as may be prescribed :

Provided that the Principal Commissioner of Customs or Commissioner of Customs] may, in cases where it is not feasible to make entry by presenting electronically on the customs automated system, allow an entry to be presented in any other manner:

Provided further that if the importer makes and subscribes to a declaration before the proper officer, to the effect that he is unable for want of full information to furnish all the particulars of the goods required under this sub-section, the proper officer may, pending the production of such information, permit him, previous to the entry thereof (a) to examine the goods in the presence of an officer of customs, or (b) to deposit the goods in a public warehouse appointed under section 57 without warehousing the same.

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(2) *Save as otherwise permitted by the proper officer, a bill of entry shall include all the goods mentioned in the bill of lading or other receipt given by the carrier to the consignor.*

(3) *The importer shall present the bill of entry under sub-section (1) before the end of the day (including holidays) preceding the day on which the aircraft or vessel or vehicle carrying the goods arrives at a customs station at which such goods are to be cleared for home consumption or warehousing:*

Provided *that the Board may, in such cases as it may deem fit, prescribe different time limits for presentation of the bill of entry, which shall not be later than the end of the day of such arrival:*

Provided *further that a bill of entry may be presented at any time not exceeding thirty days prior to the expected arrival of the aircraft or vessel or vehicle by which the goods have been shipped for importation into India:*

Provided *also that where the bill of entry is not presented within the time so specified and the proper officer is satisfied that there was no sufficient cause for such delay, the importer shall pay such charges for late presentation of the bill of entry as may be prescribed.*

(4) *The importer while presenting a bill of entry shall make and subscribe to a declaration as to the truth of the contents of such bill of entry and shall, in support of such declaration, produce to the proper officer the invoice, if any, and such other documents relating to the imported goods as may be prescribed.*

(4A) *The importer who presents a bill of entry shall ensure the following, namely:-*

- (a) the accuracy and completeness of the information given therein;*
- (b) the authenticity and validity of any document supporting it; and*
- (c) compliance with the restriction or prohibition, if any, relating to the goods under this Act or under any other law for the time being in force.*

(5) *If the proper officer is satisfied that the interests of revenue are not prejudicially affected and that there was no fraudulent intention, he may permit substitution of a bill of entry for home consumption for a bill of entry for warehousing or vice versa.*

H) Section 111. Confiscation of improperly imported goods, etc.

The following goods brought from a place outside India shall be liable to confiscation: -

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(a) any goods imported by sea or air which are unloaded or attempted to be unloaded at any place other than a customs port or customs airport appointed under clause (a) of section 7 for the unloading of such goods;

(b) any goods imported by land or inland water through any route other than a route specified in a notification issued under clause (c) of section 7 for the import of such goods;

(c) any dutiable or prohibited goods brought into any bay, gulf, creek or tidal river for the purpose of being landed at a place other than a customs port;

(d) any goods which are imported or attempted to be imported or are brought within the Indian customs waters for the purpose of being imported, contrary to any prohibition imposed by or under this Act or any other law for the time being in force;

(e) any dutiable or prohibited goods found concealed in any manner in any conveyance;

(f) any dutiable or prohibited goods required to be mentioned under the regulations in an 1 [arrival manifest or import manifest] or import report which are not so mentioned;

(g) any dutiable or prohibited goods which are unloaded from a conveyance in contravention of the provisions of section 32, other than goods inadvertently unloaded but included in the record kept under sub-section (2) of section 45;

(h) any dutiable or prohibited goods unloaded or attempted to be unloaded in contravention of the provisions of section 33 or section 34;

(i) any dutiable or prohibited goods found concealed in any manner in any package either before or after the unloading thereof;

(j) any dutiable or prohibited goods removed or attempted to be removed from a customs area or a warehouse without the permission of the proper officer or contrary to the terms of such permission;

(k) any dutiable or prohibited goods imported by land in respect of which the order permitting clearance of the goods required to be produced under section 109 is not produced or which do not correspond in any material particular with the specification contained therein;

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(l) any dutiable or prohibited goods which are not included or are in excess of those included in the entry made under this Act, or in the case of baggage in the declaration made under section 77;

(m) 2[any goods which do not correspond in respect of value or in any other particular] with the entry made under this Act or in the case of baggage with the declaration made under section 77 3 [in respect thereof, or in the case of goods under trans-shipment, with the declaration for trans-shipment referred to in the proviso to sub-section (1) of section 54];

(n) any dutiable or prohibited goods transited with or without trans-shipment or attempted to be so transited in contravention of the provisions of Chapter VIII;

(o) any goods exempted, subject to any condition, from duty or any prohibition in respect of the import thereof under this Act or any other law for the time being in force, in respect of which the condition is not observed unless the non-observance of the condition was sanctioned by the proper officer;

(p) any notified goods in relation to which any provisions of Chapter IVA or of any rule made under this Act for carrying out the purposes of that Chapter have been contravened.

(q) any goods imported on a claim of preferential rate of duty which contravenes any provision of Chapter VAA or any rule made thereunder.

I) SECTION 112. Penalty for improper importation of goods, etc.-

Any person, -

(a) who, in relation to any goods, does or omits to do any act which act or omission would render such goods liable to confiscation under section 111, or abets the doing or omission of such an act, or

(b) who acquires possession of or is in any way concerned in carrying, removing, depositing, harbouring, keeping, concealing, selling or purchasing, or in any other manner dealing with any goods which he knows or has reason to believe are liable to confiscation under section 111, shall be liable, -

(i) in the case of goods in respect of which any prohibition is in force under this Act or any other law for the time being in force, to a penalty 1 [not exceeding the value of the goods or five thousand rupees], whichever is the greater;

(ii) in the case of dutiable goods, other than prohibited goods, subject to the provisions of section 114A, to a penalty not exceeding ten per cent. of the duty sought to be evaded or five thousand rupees, whichever is higher :

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Provided that where such duty as determined under sub-section (8) of section 28 and the interest payable thereon under section 28AA is paid within thirty days from the date of communication of the order of the proper officer determining such duty, the amount of penalty liable to be paid by such person under this section shall be twenty-five per cent. of the penalty so determined;]

(iii) in the case of goods in respect of which the value stated in the entry made under this Act or in the case of baggage, in the declaration made under section 77 (in either case hereafter in this section referred to as the declared value) is higher than the value thereof, to a penalty 4 [not exceeding the difference between the declared value and the value thereof or five thousand rupees], whichever is the greater;]

(iv) in the case of goods falling both under clauses (i) and (iii), to a penalty 5 [not exceeding the value of the goods or the difference between the declared value and the value thereof or five thousand rupees], whichever is the highest;

(v) in the case of goods falling both under clauses (ii) and (iii), to a penalty 6 [not exceeding the duty sought to be evaded on such goods or the difference between the declared value and the value thereof or five thousand rupees], whichever is the highest.]

J) Section 114A. Penalty for short-levy or non-levy of duty in certain cases.

Where the duty has not been levied or has been short-levied or the interest has not been charged or paid or has 2 [****]been part paid or the duty or interest has been erroneously refunded by reason of collusion or any wilful mis-statement or suppression of facts, the person who is liable to pay the duty or interest, as the case may be, as determined under 3 [sub-section (8) of section 28] shall also be liable to pay a penalty equal to the duty or interest so determined:

4 [**Provided** that where such duty or interest, as the case may be, as determined under 3 [sub-section (8) of section 28], and the interest payable thereon under section 5 [28AA], is paid within thirty days from the date of the communication of the order of the proper officer determining such duty, the amount of penalty liable to be paid by such person under this section shall be twenty-five per cent of the duty or interest, as the case may be, so determined: **Provided** further that the benefit of reduced penalty under the first proviso shall be available subject to the condition that the amount of penalty so determined has also been paid within the period of thirty days referred to in that proviso : **Provided** also that where the duty or interest determined to be payable is reduced or increased by the Commissioner (Appeals), the Appellate Tribunal or, as the case may be, the court, then, for the purposes of this section, the duty or

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interest as reduced or increased, as the case may be, shall be taken into account:

Provided also that in case where the duty or interest determined to be payable is increased by the Commissioner (Appeals), the Appellate Tribunal or, as the case may be, the court, then, the benefit of reduced penalty under the first proviso shall be available if the amount of the duty or the interest so increased, along with the interest payable thereon under section 5 [28AA], and twenty-five percent of the consequential increase in penalty have also been paid within thirty days of the communication of the order by which such increase in the duty or interest takes effect :

Provided also that where any penalty has been levied under this section, no penalty shall be levied under section 112 or section 114.

Explanation. - For the removal of doubts, it is hereby declared that -

(i) the provisions of this section shall also apply to cases in which the order determining the duty or interest 3 [sub-section (8) of section 28] relates to notices issued prior to the date* on which the Finance Act, 2000 receives the assent of the President;

(ii) any amount paid to the credit of the Central Government prior to the date of communication of the order referred to in the first proviso or the fourth proviso shall be adjusted against the total amount due from such person.]

K) Section 114AA. Penalty for use of false and incorrect material. -

If a person knowingly or intentionally makes, signs or uses, or causes to be made, signed or used, any declaration, statement or document which is false or incorrect in any material particular, in the transaction of any business for the purposes of this Act, shall be liable to a penalty not exceeding five times the value of goods.

L) Further, vide Finance Act, 2011 w.e.f. 08.04.2011 "Self-Assessment" has been introduced under the Customs Act, 1962. Section 17 of the said Act provides for self-assessment of duty on import and export goods by the importer or exporter himself by filing a bill of entry or shipping bill as the case may be, in the electronic form, as per Section 46 or 50 respectively. Thus, under self-assessment, it is the importer or exporter who will ensure that he declares the correct classification, applicable rate of duty, value, benefit of exemption notification claimed, if any in respect of the imported/ exported goods while presenting Bill of Entry or Shipping Bill.

M) Customs Valuation (Determination of Value of Imported Goods) Rules,2007:

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3. Determination of the method of valuation.-

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(1) Subject to rule 12, the value of imported goods shall be the transaction value adjusted in accordance with provisions of rule 10;

(2) Value of imported goods under sub-rule (1) shall be accepted: Provided that

—

(a) there are no restrictions as to the disposition or use of the goods by the buyer other than restrictions which –

(i) are imposed or required by law or by the public authorities in India;

or

(ii) limit the geographical area in which the goods may be resold; or

(iii) do not substantially affect the value of the goods;

(b) the sale or price is not subject to some condition or consideration for which a value cannot be determined in respect of the goods being valued;

(c) no part of the proceeds of any subsequent resale, disposal or use of the goods by the buyer will accrue directly or indirectly to the seller, unless an appropriate adjustment can be made in accordance with the provisions of rule 10 of these rules; and

(d) the buyer and seller are not related, or where the buyer and seller are related, that transaction value is acceptable for customs purposes under the provisions of sub-rule (3) below.

(3) (a) Where the buyer and seller are related, the transaction value shall be accepted provided that the examination of the circumstances of the sale of the imported goods indicate that the relationship did not influence the price.

(b) In a sale between related persons, the transaction value shall be accepted, whenever the importer demonstrates that the declared value of the goods being valued, closely approximates to one of the following values ascertained at or about the same time.

(i) the transaction value of identical goods, or of similar goods, in sales to unrelated buyers in India;

(ii) the deductive value for identical goods or similar goods;

(iii) the computed value for identical goods or similar goods:

Provided that in applying the values used for comparison, due account shall be taken of demonstrated difference in commercial levels, quantity levels, adjustments in accordance with the provisions of rule 10 and cost incurred by the seller in sales in which he and the buyer are not related;

(c) substitute values shall not be established under the provisions of clause (b) of this sub-rule.

(4) if the value cannot be determined under the provisions of sub-rule (1), the value shall be determined by proceeding sequentially through rule 4 to 9.

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4. Transaction value of identical goods. –

(1)(a) Subject to the provisions of rule 3, the value of imported goods shall be the transaction value of identical goods sold for export to India and imported at or about the same time as the goods being valued;

Provided that such transaction value shall not be the value of the goods provisionally assessed under section 18 of the Customs Act, 1962.

(b) In applying this rule, the transaction value of identical goods in a sale at the same commercial level and in substantially the same quantity as the goods being valued shall be used to determine the value of imported goods.

(c) Where no sale referred to in clause (b) of sub-rule (1), is found, the transaction value of identical goods sold at a different commercial level or in different quantities or both, adjusted to take account of the difference attributable to commercial level or to the quantity or both, shall be used, provided that such adjustments shall be made on the basis of demonstrated evidence which clearly establishes the reasonableness and accuracy of the adjustments, whether such adjustment leads to an increase or decrease in the value.

(2) Where the costs and charges referred to in sub-rule (2) of rule 10 of these rules are included in the transaction value of identical goods, an adjustment shall be made, if there are significant differences in such costs and charges between the goods being valued and the identical goods in question arising from differences in distances and means of transport.

(3) In applying this rule, if more than one transaction value of identical goods is found, the lowest such value shall be used to determine the value of imported goods.

5. Transaction value of similar goods.-

(1) Subject to the provisions of rule 3, the value of imported goods shall be the transaction value of similar goods sold for export to India and imported at or about the same time as the goods being valued:

Provided that such transaction value shall not be the value of the goods provisionally assessed under section 18 of the Customs Act, 1962.

(2) The provisions of clauses (b) and (c) of sub-rule (1), sub-rule (2) and sub-rule (3), of rule 4 shall, mutatis mutandis, also apply in respect of similar goods.

6. Determination of value where value cannot be determined under rules 3, 4 and 5.-

If the value of imported goods cannot be determined under the provisions of rules 3, 4 and 5, the value shall be determined under the provisions of rule 7 or, when the value cannot be determined under that rule, under rule 8.

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Provided that at the request of the importer, and with the approval of the proper officer, the order of application of rules 7 and 8 shall be reversed.

7. Deductive value.-

(1) Subject to the provisions of rule 3, if the goods being valued or identical or similar imported goods are sold in India, in the condition as imported at or about the time at which the declaration for determination of value is presented, the value of imported goods shall be based on the unit price at which the imported goods or identical or similar imported goods are sold in the greatest aggregate quantity to persons who are not related to the sellers in India, subject to the following deductions : -

- (i) either the commission usually paid or agreed to be paid or the additions usually made for profits and general expenses in connection with sales in India of imported goods of the same class or kind;*
- (ii) the usual costs of transport and insurance and associated costs incurred within India;*
- (iii) the customs duties and other taxes payable in India by reason of importation or sale of the goods.*

(2) If neither the imported goods nor identical nor similar imported goods are sold at or about the same time of importation of the goods being valued, the value of imported goods shall, subject otherwise to the provisions of sub-rule (1), be based on the unit price at which the imported goods or identical or similar imported goods are sold in India, at the earliest date after importation but before the expiry of ninety days after such importation.

*(3) (a) If neither the imported goods nor identical nor similar imported goods are sold in India in the condition as imported, then, the value shall be based on the unit price at which the imported goods, after further processing, are sold in the greatest aggregate quantity to persons who are not related to the seller in India.
(b) In such determination, due allowance shall be made for the value added by processing and the deductions provided for in items (i) to (iii) of sub-rule (1).*

8. Computed value.- *Subject to the provisions of rule 3, the value of imported goods shall be based on a computed value, which shall consist of the sum of:-*

- (a) the cost or value of materials and fabrication or other processing employed in producing the imported goods;*
- (b) an amount for profit and general expenses equal to that usually reflected in sales of goods of the same class or kind as the goods being valued which are made by producers in the country of exportation for export to India;*
- (c) the cost or value of all other expenses under sub-rule (2) of rule 10.*

9. Residual method.-

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(1) Subject to the provisions of rule 3, where the value of imported goods cannot be determined under the provisions of any of the preceding rules, the value shall be determined using reasonable means consistent with the principles and general provisions of these rules and on the basis of data available in India;

Provided that the value so determined shall not exceed the price at which such or like goods are ordinarily sold or offered for sale for delivery at the time and place of importation in the course of international trade, when the seller or buyer has no interest in the business of other and price is the sole consideration for the sale or offer for sale.

(2) No value shall be determined under the provisions of" this rule on the basis of –

(i) the selling price in India of the goods produced in India;

(ii) a system which provides for the acceptance for customs purposes of the highest of the two alternative values;

(iii) the price of the goods on the domestic market of the country of exportation;

(iv) the cost of production other than computed values which have been determined for identical or similar goods in accordance with the provisions of rule 8;

(v) the price of the goods for the export to a country other than India;

(vi) minimum customs values; or

(vii) arbitrary or fictitious values.

17. REJECTION OF THE TRANSACTION VALUE DECLARED BY M/S SADA STEEL IMPEX and M/S JENNI ENTERPRISES UNDER RULE 12 OF CUSTOMS VALUATION RULES 2007:

17.1 From the investigation and evidences on record, it has, inter alia, emerged that the actual transaction value of the goods was substantially higher than the values declared by M/s Sada Steel Impex and M/s Jenni Enterprises. The undervaluation of the impugned goods was carried out in the Bills of Entry through submission of forged and fabricated invoices with the intent to illegally evade payment of legitimate Customs duty. It further appears that M/s Sada Steel Impex and M/s Jenni Enterprises, instead of declaring the correct transaction value at the port of import, deliberately suppressed the actual value of the goods.

The retrieval of genuine invoices pertaining to imports by M/s Sada Steel Impex and M/s Jenni Enterprises, and their comparison with the invoices declared before Indian Customs, clearly demonstrate suppression of the declared value. Moreover, the modus operandi of using fake invoices supplied by certain Chinese suppliers has been investigated in the past, which revealed the names of several suspected suppliers in China and a recurring pattern of

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undervaluation of goods. This pattern is also evident in the imports of M/s Sada Steel Impex and M/s Jenni Enterprises.

17.2 In view of the commonality of Chinese suppliers involved, consistent pattern of suppressed values-declared at the time of import, and presence of direct evidences-in form of genuine invoices against the both firms, the declared value of the impugned goods appears not the correct transaction value at which the said goods have been purchased by M/s Sada Steel Impex and M/s Jenni Enterprises from the overseas Chinese suppliers. Therefore, the declared transaction value of the impugned goods is liable to be rejected.

17.3. Further, in terms of Section 14 of the Customs Act, 1962, the value of the imported goods shall be the transaction value that is to say that price actually paid or payable for the goods when sold for export to India for delivery at the time and place of importation, subject to such other conditions as may be specified in this behalf by the rules made in this regard. Further, in accordance with such provisions, Central Government has made Customs Valuation (Determination of value of imported goods) Rules, 2007 (herein after referred to as "CVR 2007"). Further, as per Rule 3 of the CVR, 2007, the transaction value of imported goods shall be the price actually paid or payable for the goods when sold for export. The evidences and voluntary statements recorded under Section 108 of Customs Act, 1962 discussed herein foregoing paras suggest that the values declared in relation to the impugned goods i.e. Cold Rolled Stainless Steel coils (Ex stock) of Grade J3 and Grade J2 are not the correct value and the same are liable to be rejected in terms of Rule 12 of the Customs Valuation (Determination of value of Imported Goods) Rules, 2007.

17.3.(a) Rule 3 (1) of the CVR, 2007 lays down that the value of the imported goods shall be the transaction value adjusted in accordance with provisions of Rule 10 CVR 2007. Further Rule 2(g) of CVR 2007 defines transaction value as the value referred to in sub-section (1) of Section 14 of the Customs Act 1962. Rule 13 of the CVR, 2007 lays down that the interpretative notes specified in the Schedule to these rules shall apply for the interpretation of these rules. The interpretative note to Rule 3 provides that price actually paid or payable is the total payment made or to be made by the buyer to or for the benefit of the seller for the imported goods.

17.4. On a combined reading of the Section 14 *ibid* & the CVR 2007, it appears that customs duty is payable on transaction value that is to say that:

- (1) Price actually paid or payable for the goods i.e. the total payment made by the buyer
- (2) When sold for export to India for delivery

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(3) At the time and place of importation

17.5 It appears that in terms of Rule 3 of the CVR 2007 read with Section 14 of the Customs Act, 1962 and the schedule to the valuation rules (CVR 2007), the actual price paid or payable for the impugned goods, should have formed part of the assessable value for the purpose of calculation of Customs duty as the same is the actual transaction value of the imported goods.

17.6. Since it appears that the values declared by M/s Sada Steel Impex and M/s Jenni Enterprises are not the correct transaction values and are liable to be rejected in terms of Rule 12 of the Customs Valuation Rules, 2007, as M/s Sada Steel Impex and M/s Jenni Enterprises appears to have indulged in mis-declaration of value of the goods and have used fraudulent and manipulated documents [explanation 1(iii) (d) & (f) of Rule 12 CVR 2007]. Rule 12(1) provides that in such cases it shall be deemed that the transaction value cannot be determined under the provisions of sub- Rule 1 of Rule 3.

17.7 From the foregoing, there appears sufficient reason to believe that the value of the impugned items declared by the M/s Sada Steel Impex and M/s Jenni Enterprises in the respective Bills of Entry are not the actual transaction values and the same appear liable to be rejected in terms of rule 12 of Customs Valuation (Determination of Value of Imported Goods) Rules, 2007.

18. RE-DETERMINATION OF VALUE OF THE IMPORTED GOODS:

18.1 VALUATION OF THE GOODS WHERE GENUINE INVOICES AGAINST BILLS OF ENTRY ARE AVAILABLE:

As per Rule 3 of the Customs Valuation (Determination of value of imported goods) Rules, 2007, subject to Rule 12 *ibid*, the value of the goods shall be the 'Transaction Value of goods. Further, in terms of Section 14 of the Customs Act, 1962, the transaction value is the price actually paid or payable for the goods when the goods are sold for delivery at the time and place of importation. In this case, the investigations have led to the recovery of irrefutable evidence that the value declared before Customs is not the actual transaction value of goods. Therefore, in terms of Rule 3(1) of Customs Valuation Rules, read with Section 14 of the Customs Act 1962, for the Bills of Entry where Genuine Invoices are available, the value mentioned in these Genuine Invoices is being taken as the actual transaction value of the goods for the purpose of valuation of the goods.

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18.2 VALUATION OF GOODS WHERE GENUINE INVOICES AGAINST BILLS OF ENTRY ARE NOT AVAILABLE:

Further, for the goods where original invoices are not available, the value of said consignments is to be re-determined under Customs Valuation (Determination of value of imported goods) Rules, 2007. Further, in terms of Rule 3 (4) of the said rules, for the Bills of Entry where Genuine Invoices are not available, the value has to be re-determined by proceeding sequentially through Rule 4 to 9.

18.2.1. Application of Rule 4 of CVR, 2007:

Rule 4 of the Valuation Rules, 2007 provides that the value of imported goods shall be the transaction value of identical goods sold for export to India and imported at or about the same time as the goods being valued. However, the following conditions as per Rule 4 read with Rule 2(l)(d) of the Valuation Rules, 2007 must be satisfied by the 'identical goods', before their value can be used as a basis for determining the correct values of the goods in question. Thus, the identical goods should be:

- i. which are same in all respects, including physical characteristics, quality and reputation as the goods being valued except for minor differences in appearance that do not affect the value of the goods;
- ii. produced in the country in which the goods being valued were produced; and
- iii. produced by the same person who produced the goods, or where no such goods are available, goods produced by a different person;

The value of the Cold Rolled Stainless Steel Coils depends upon number of factors including their constituents, width, thickness, surface finish, etc. Further, the nature of goods varies greatly in physical characteristics due to their composition, quality, reputation etc. In the absence of correct composition, surface finish etc., it is not feasible to identify the 'identical goods' (which satisfied the above criteria) imported by the other importers during contemporaneous time for comparing the value declared by the other importers vis a vis value declared by the instant importer. Hence, it would not be proper to determine the value of the goods under Rule 4 of the CVR 2007-

18.2.2. Application of Rule 5 of CVR, 2007:

- i) Rule 5 of the Valuation Rules, 2007 provides that the value of imported goods shall be the transaction value of similar goods sold for export to India and imported at or about the same time as the goods being valued. However,

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the following conditions as per Rule 5 read with Rule 2(l)(f) of the Valuation Rules, 2007 must be satisfied by the 'similar goods', before their value can be used as a basis for determining the correct values of the goods in question. Thus, the 'similar goods', should be :

- i) which although not alike in all respects, have like characteristics and like component materials which enable them to perform the same functions and to be commercially interchangeable with the goods being valued having regard to the quality, reputation and the existence of trade mark;
- ii) produced in the country in which the goods being valued were produced; and
- iii) produced by the same person who produced the goods being valued, or where no such goods are available, goods produced by a different person,

ii) This provision ensures a logical, consistent, and legally sound framework for valuation in complex import scenarios. In the instant case, the availability of 'similar goods', from the same suppliers, provides a practical and justifiable route for determining customs value. Firstly, while the imported goods may not be 'identical' due to their diverse physical features, their functional interchangeability, commercial comparability, and availability in the same market segment often qualify them as "similar goods" under the definitions provided in the Valuation Rules. These goods may serve similar purposes and cater to the same consumer base. Therefore, though minor distinctions exist, their economic value and utility are sufficiently aligned, allowing reasonably rely on their transaction values for valuation purposes. Secondly, the availability of similar goods simplifies the valuation process significantly. In an increasingly globalized trading environment, firms often engage with the same suppliers for a variety of goods with marginal differences. This commercial reality results in a rich repository of invoices and import records, providing multiple reference points for similar transactions. Such documentation enhances transparency, traceability, and accuracy in customs assessment, reinforcing the legitimacy of values derived through comparison. Moreover, using the transaction value of similar goods is not only procedurally permissible but also equitable. It ensures that the valuation reflects a price actually paid or payable for comparable merchandise under comparable conditions. This deters undervaluation and promotes a level playing field for all importers, as duties are levied based on fair market benchmarks rather than arbitrary estimations. Lastly, the presence of multiple retrieved (genuine) invoices pertaining to the same suppliers or suppliers from same country dealing in similar goods further strengthens the application of Rule 5. These invoices reflect genuine pricing trends and reduce anomalies during valuation. **Therefore, use of these retrieved genuine invoices appears justifiable to arrive at a reliable and verifiable valuation for the impugned**

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goods, even in the absence of a direct transaction value for the impugned goods in question. In the instant case, the impugned goods have the same description (i.e. J3/J2, Ex stock) as that of the goods mentioned in the retrieved invoices and have been imported from the same set of Chinese suppliers who have been identified as suspicious suppliers in the past investigation. Further, the impugned goods have been imported at or about the same time as that in the retrieved invoices and have like characteristics and are commercially interchangeable with the goods mentioned in the retrieved invoices. Therefore, it appears that the impugned goods are similar goods with the goods mentioned in the retrieved invoices thus meriting the use of rule 5 of the valuation rules for arriving at the redetermined prices.

iii) Accordingly, valuation of the imported goods, imported at or around the same time as that of the genuine retrieved invoices) by above three firms, in terms of Rule 5 of the valuation rules, has been arrived at as follows:

- In those imports, where importer has imported the Cold Rolled Stainless Steel coils(Ex stock) (Grade J3 /J2 in instant matter) from a suspected Chinese supplier(i.e supplier belonging to the list of 18 Chinese Suppliers as identified in discussions in para supra of this notice) and a genuine invoice from that suspected Chinese supplier for the same grade (i.e. Grade J3 /J2) is available, the valuation for these imports is determined based on the **lowest-value** mentioned in the all genuine invoice for that grade of cold rolled stainless steel, issued by that suspected Chinese supplier.

- In those imports, where the importer has imported goods of a particular grade (Grade J3 /J2 in instant case) and where genuine invoice of that suspected Chinese supplier are not available, then for valuation purpose, genuine invoice available having the lowest value of that particular grade, among all the suspected Chinese supplier, has been taken to arrive at the redetermined value.

19. Role of Key Persons and Analysis and findings:

From the investigation conducted in the case and from the facts and records, evidences have come on record from which it appears that:

A) In respect of the firm M/s Sada Steel Impex:

- a. Shri Amit Gupta through his proprietorship firm namely M/s Sada Steel Impex imported under-valued goods namely coils of cold rolled stainless steel by using fabricated invoices; that Shri Amit Gupta in connivance with Chinese suppliers appears to have manipulated and

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forged the import invoices and declared them before Customs; further the substantive evidence in form of genuine invoice Serial No. TY2202V3812 dated 07.09.2022 issued by one of the suspected Chinese Supplier M/s HK PINGAN IMP AND EXP CO LIMITED, which was subsequently sold to M/s Total Cargo Services by suppressing the value of the goods, reinforces the allegations that Shri Amit Gupta through his proprietorship firm had been engaged in under-valuation in import of "Cold Rolled Stainless Steel"; that Shri Amit Gupta appears to have meticulously planned the unscrupulous modus-operandi to defraud the government by not declaring the correct value of the imported goods and deliberately mis classifying the imported goods to avail undue concessional duty benefits and consequently paid/attempted to pay lesser Customs duty on import of the goods; that Shri Amit Gupta through his firm M/s Sada Steel Impex had been involved in under-valuation over the years with an intent to evade payment of appropriate customs duty; that in terms of Section 46(4), the importer, while presenting the Bill of Entry shall make and subscribe to a declaration as the truth of the contents of such Bill of Entry and shall, in support of such declaration, produce to the proper officer, the invoice, if any, relating to the imported goods. In view of the above, it appears that Shri Amit Gupta Proprietor of M/s Sada Steel Impex have violated the provisions of Section 46 of the Customs Act, 1962 by mis-declaring the value and classification of the goods. Thus, Shri Amit Gupta appear to have violated the provisions of Section 46(4) of the customs act in as much as he has undervalued the value of the goods and mis classified the goods imported by him in his firm M/s Sada Steel Impex and had given a false declaration in the bills of entry; the goods imported vide above mentioned bills of entry appear mis-declared in respect to their declared value and description in the Bills of entry, and therefore appear liable to be confiscated in terms of section 111(m) and 111(o) of the Customs act, 1962 for the above mentioned acts and omission of M/s Sada Steel Impex.

Further, due to the mis-declaration in terms of value and classification as discussed above, correct duty has not been levied on the impugned goods and therefore, the differential duty on account of such mis-declaration as per **Annexure X** is liable to be demanded from the M/s Sada Steel Impex under Sec 28(4) of the Customs Act 1962. Further, due to his act of omission and commission Shri Amit Gupta also rendered himself liable to penalty under Section 114A and/or 112 (a)&(b) and Section 114AA of Customs Act 1962. That further despite of giving Shri Amit Gupta many opportunities to join the investigation (by issuing many summonses), he did not prefer to join the investigation

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even after passing more than one and half year; which suggests his intention to evade scrutiny and accountability; the absence of cooperation also suggests that the individual lack credible arguments or evidence to defend himself, against the substantial evidence.

b. Role of Shri Arjun Guglani, Partner of M/s Total Cargo Services-

From the investigation and statements recorded under Section 108 of the Customs Act, 1962, it appears that Shri Arjun Guglani, Partner and Authorized Signatory of M/s Total Cargo Services, was actively involved in the import operations of the firm and looked after all day-to-day business activities, including clearance of imported consignments before Indian Customs. In his voluntary statements dated 08.01.2024, 30.05.2024, and 06.10.2025, Shri Guglani has categorically admitted that M/s Total Cargo Services was engaged in import of Cold Rolled Stainless Steel (Grade J3) from China, either directly or through High Sea Sale transactions. He has further admitted that the firm used two sets of invoices—one genuine and one fabricated—for the same consignments, in order to declare undervalued prices before Customs authorities and thereby evade customs duty. On being shown both the genuine and fabricated invoices, bearing Invoice No. TY2202V3812 dated 07.09.2022 issued by the Chinese supplier M/s H.K. Pingan Import & Export Co. Ltd. to M/s Sada Steel Impex, one showing a unit price of USD 1.565 per kg (genuine) and the other USD 0.78 per kg (fabricated), Shri Guglani admitted that both invoices bore the same number and description of goods; the invoice with higher value was genuine, while the one with lower value was fake/fabricated; the fabricated invoice was deliberately submitted before Customs at the time of clearance of goods under Bill of Entry No. 2725688 dated 03.10.2022; the purpose of using such fabricated invoice was to suppress the assessable value of the imported goods and thereby evade applicable customs duty. Shri Guglani has also stated that the above consignment was purchased by his firm, M/s Total Cargo Services, from M/s Sada Steel Impex under a High Sea Sale Agreement, and that he had used the fabricated invoice showing lower value for clearance of the said goods before Customs authorities. He further admitted that the fabricated invoices used for such undervaluation were provided to him by Shri Amit Gupta, Proprietor of M/s Sada Steel Impex. Thus, it appears that he was fully aware that these invoices did not represent the true transaction value of the imported goods. He also confirmed that this practice of using fabricated invoices was a regular modus operandi adopted by his firm for evasion of customs duties.

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From the above, it appears that Shri Arjun Guglani knowingly participated in and facilitated the import of goods at suppressed values by using false and fabricated invoices, thereby rendering the goods liable to confiscation under Section 111(m) of the Customs Act, 1962. In view of the same, Shri Arjun Guglani appears to be liable to penal action under Section 112(a) and/or 112(b) and 114AA of the Customs Act, 1962.

- B) **In respect of the firm M/s Jenni Enterprises:** Shri Dheeraj Kumar Rao, Proprietor of M/s Jenni Enterprises who is suspected to have allowed his firm to be used and controlled by Shri Amit Gupta for importing under-valued Cold Rolled Stainless Steel; that above fact is corroborated by statements of Shri Atul Kishore Guglani (CHA) that all import documents and final approval for Customs regarding M/s Jenni Enterprises had been given by Shri Amit Gupta; further the domestic buyers of M/s Jenni Enterprises namely Shri Gaurav Khurana (Proprietor of M/s AG Enterprises), Shri Kartik Gupta (Proprietor of M/s M K Industries), and Shri Rakesh Sharma (Proprietor of M/s M K Overseas) also confirmed that domestic sale and purchases in respect of M/s Jenni Enterprises was being handled by Shri Amit Gupta; further the substantive evidence in form of genuine invoice in respect to M/s Jenni Enterprises issued by a suspected Chinese supplier M/s Leo Metals Limited (unit price at USD 2 per KG) , which were filed before Indian Customs at under-valued price of USD 0.75 per KG reinforces the allegations that M/s Jenni Enterprise had been importing Cold Rolled Stainless steel by under-valuing them; Thus, it appears that Shri Dheeraj Kumar Rao had a tacit understanding of the unscrupulous modus-operandi being executed by Shri Amit Gupta to defraud the government by not declaring the correct value of the imported goods and consequently paid/attempted to pay lesser Customs duty on import of the goods; that Shri Dheeraj Kumar Rao through his firms M/s Jenni Enterprises appears to be an accomplice with Shri Amit Gupta in under-valuation over the years in the firm with an intent to evade payment of appropriate customs duty; that in terms of Section 46(4), the importer, while presenting the Bill of Entry shall make and subscribe to a declaration as the truth of the contents of such Bill of Entry and shall, in support of such declaration, produce to the proper officer, the invoice, if any, relating to the imported goods. In view of the above, it appears that Shri Dheeraj Kumar Rao (Proprietor of M/s Jenni Enterprises) has violated the provisions of Section 46 of the Customs Act, 1962 by mis-declaring the value of the goods. Thus, Shri Dheeraj Kumar Rao, who assisted Shri

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Amit Gupta in his illegal activities, appear to have violated the provisions of Section 46(4) of the customs act in as much as he has undervalued the value of the goods imported by his firm M/s Jenni Enterprises and had given a false declaration in the bills of entry; the goods imported vide above mentioned bills of entry appear mis-declared in respect to their declared value in the Bills of entry, and therefore appear liable to be confiscated in terms of section 111(m) of the Customs act, 1962 for the above mentioned acts and omission of M/s Jenni Enterprises. Further, due to the mis-declaration of value as discussed above, correct duty has not been levied on the impugned goods and therefore, the differential duty on account of such mis-declaration as per Annexure Y is liable to be demanded from the M/s Jenni Enterprises under Sec 28(4) of the Customs Act 1962. Further, due to his act of omission and commission Shri Dheeraj Kumar Rao also rendered himself liable to penalty under Section 114A and/or 112 (a) &(b) and Section 114AA of Customs Act 1962. That further despite of giving Shri Dheeraj Kumar Rao many opportunities to join the investigation (by issuing many summonses), he did not prefer to join the investigation even after passing more than one year, which suggests his intention to evade scrutiny and accountability; the absence of cooperation also suggests that the individuals lack credible arguments or evidence to defend himself, against the substantial evidence.

Further, Sh Amit Gupta played a central role in orchestrating the fraudulent import activities of M/s Jenni Enterprises by controlling and managing the firm's import documentation and final approvals for Customs clearance. He facilitated the under-valuation of Cold Rolled Stainless Steel consignments and declaring them at a much lower unit price than their genuine value, resulting in evasion of applicable customs duty. Given his active involvement in mis-declaring the value of goods in importation of impugned goods by M/s Jenni Enterprises, Sh Amit Gupta is liable for penal action under Sections 112(a) & (b), and 114AA of the Customs Act, 1962 for abetment in the deliberate attempts to evade payment of appropriate customs duty in collusion with the proprietor of M/s Jenni Enterprises.

- C) **Shri Atul Kishore Guglani** (Partner in M/s Choice Cargo Agency Private Limited) and **Shri Mukesh Grover** (Proprietor of M/s Mukesh Grover): As CHA/Customs Broker, Shri Mukesh Grover and Shri Atul Kishore Guglani were entrusted with all the work including documentations and were responsible for the movement of cargo right from entering the port till it was cleared by customs. Shri Mukesh Grover being in the trade for so long were fully aware of their own

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responsibilities as CHA/Customs Brokers but still failed to deliver and in a way aided undervaluation by M/s Sada Steel Impex and M/s Jenni Enterprises. Further, Shri Atul Kishore Guglani aided and abetted the importing firms in the scheme involving undervaluation of goods. As discussed above, for the purpose of Customs clearance, in the above-mentioned firms, he used to receive import documents from the proprietors of the firms directly, which he further passed on to Shri Mukesh Grover CHA for clearance. It is also evident from the statements of Shri Mukesh Grover and Shri Atul Kishore Guglani that they had knowledge that the imported goods were undervalued. Further, Shri Mukesh Grover and Shri Atul Kishore Guglani had acknowledged that they had submitted the Customs documents with incorrect classification in respect of imports by M/s Sada Steel Impex. Thus the role of Shri Atul Kishore Guglani and Sh Mukesh Grover appear doubtful who appear to have full knowledge of the illegal activities of the firms accused of under-valuation(in respect of M/s Jenni Enterprises and M/s Sada Steel Impex) and mis-classification in import of Cold Rolled Stainless Steel investigations(in respect of M/s Jenni Enterprises) ; that they themselves are CHA and had a long career as Customs Broker (since 2006) and handling the Commodity Cold Rolled Stainless Steel Coils since 2016, could not provide any satisfactory answer how they were not aware of the actual transaction value and consequently rendered them liable for penalty under Section 112(a)&(b) and 114AA of the Customs Act, 1962.

Due to the mis-declaration of value and misclassification as discussed above, correct duty has not been levied on the impugned goods and therefore, the differential duty on account of such mis-declaration in terms of value and classification as per Annexure X and Annexure Y are liable to be demanded from the M/s Sada Steel Impex and M/s Jenni Enterprises respectively, under Sec 28(4) of the Customs Act 1962.

20. APPLICABILITY OF SECTION 28(4) OF THE CUSTOMS ACT, 1962:

20.1. In the present case, it is evident that the actual facts were known to Shri Amit Gupta along with Shri Dheeraj Kumar Rao; that Shri Amit Gupta along with, Shri Dheeraj Kumar Rao had knowingly and deliberately indulged in suppression of facts and wilfully misrepresented/mis-stated the material facts in contravention of the provisions of Section 46(4) of the Customs Act, 1962 read with other provisions mentioned at previous paras. In terms of Section 46(4) of Customs Act, 1962, the importer was required to make a declaration as to truth of the contents of the Bills of Entry submitted for assessment of Customs duty. For these contraventions and violations, the

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goods fall under the ambit of 'smuggled goods' within the meaning of Section 2(39) of the Customs Act, 1962, and are liable for confiscation under the provisions of Section 111(m) and 111(o) of the Customs Act, 1962.

20.2. It further emerged that mis-declaration in valuation of the impugned goods in the import documents viz. Bills of Entry, import invoices etc. presented by M/s Sada Steel Impex and M/s Jenni Enterprises, before the Customs authorities, were done by Shri Amit Gupta along with Shri Dheeraj Kumar Rao in order to avoid appropriate levy of Customs duty on the actual transaction value. Thus, Shri Amit Gupta with assistance of Shri Dheeraj Kumar appear to have engaged in under-valuation of imported goods i.e. Cold Rolled Stainless Steel Coils.

20.3 All the aforesaid acts of omissions and commissions on the part of Shri Amit Gupta along with Shri Dheeraj Kumar Rao, have rendered the imported goods liable for confiscation under Section 111 (m) and 111(o) of the Customs Act, 1962, and consequently rendered them liable for penalty under Section 114A and/or 112(a)&(b) and Section 114AA Section of the Customs Act, 1962. Further, the actions of Shri Amit Gupta along with Shri Dheeraj Kumar Rao , in knowingly and intentionally preparing or causing to be prepared, signing or causing to be signed, and using declarations, statements, and/or documents that were submitted to the Customs authorities, despite knowing that they did not reflect the true, correct, and actual value of the imported goods, render them liable for penalty under Section 114AA of the Customs Act, 1962. Shri Amit Gupta along with Shri Dheeraj Kumar Rao have also violated the provisions of Section 17 and 46 of the Customs Act, 1962. Therefore, the duty short paid is liable to be recovered from M/s Sada Steel Impex and M/s Jenni Enterprises by invoking the extended period of five years as per Section 28(4) of the Customs Act, 1962, in as much as the duty is short paid on account of wilful mis-statement as narrated above. Thus, the instant case appears to fall squarely within the ambit of Section 28(4) of Customs Act, 1962, and the differential duty appears liable to be demanded as per the extended period clause contained therein, and accordingly the importers also appear liable for penalty under Sec 114A of Customs Act 1962.

21. CALCULATION OF DUTY:

Basis the investigation, the value of goods declared by the importers have been rejected and redetermination of value of goods have been done as discussed in para supra. Therefore, the calculation of duty with respect to M/s Sada Steel Impex and M/s Jenni Enterprises under investigation are tabulated below:

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**21A. Calculation of Duty for M/s Sada Steel Impex
(November 2020-October 2023):**

Total duty liability on account of under-valuation and wrongful availment of concessional duty benefits under s.no.734 of notification no. 50/2018-customs dated 30.06.2018 (Bill of Entry Wise detailed computation of duty is as per Annexure X):

(Summary of ANNEXURE X)

TABLE-14

Sr. No.	Ports / ICDs	ASSESSABLE VALUE DECLARED BY THE IMPORTER (RS.)	DUTY PAID (RS.)	ASSESSABLE VALUE RE- DETERMINED (RS.)	DUTY PAYABLE (RS.)	Customs Duty Short paid/ to be recovered (Rs.)(Col 6- Col 4)
1	INAPL6	15,39,108	4,26,872	23,08,662	11,95,201	7,68,330
2	INMUN1	35,52,08,578	10,16,90,573	50,42,59,304	14,91,03,094	4,74,12,521
	TOTAL	35,67,47,686	10,21,17,444	50,65,67,966	15,02,98,296	4,81,80,851

Accordingly, the differential Customs duty amounting to **Rs 4,81,80,851 /-** in respect of the imports made at Port/ICD's viz. INMUN1, INAPL6, as indicated in Annexure-X to the SCN, is liable to be recovered from M/s Sada Steel Impex, under Section 28(4) of the Customs Act, 1962 along with applicable interest under Section 28 AA ibid.

Further, details of Bills of Entry where undue benefits under S.no.734 of notification no. 50/2018-customs dated 30.06.2018 by mis classifying the imported goods under CTH 72209022, have been taken and the imported goods merits reclassification under CTH 72209090 has been detailed in **ANNEXURE X1.**

21B. Calculation of Duty for M/s Jenni Enterprises (October 2021-June 2022):

Total duty liability on account of under-valuation (Bill of Entry Wise detailed computation of duty is as per Annexure Y):

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TABLE-15
Summary of Annexure Y

Sr. No.	Ports / ICDs	ASSESSABLE VALUE DECLARED BY THE IMPORTER (RS.)	DUTY PAID (RS.)	ASSESSABLE VALUE RE- DETERMINED (RS.)	DUTY PAYABLE (RS.)	Customs Duty Short paid/ to be recovered (Rs.) (Col 6-Col 4)
1	INMUN1	10,53,77,767	2,92,26,524	17,12,52,185	4,74,96,793	1,82,70,270
	TOTAL	10,53,77,767	2,92,26,524	17,12,52,185	4,74,96,793	1,82,70,270

Also, the differential Customs duty amounting to **Rs 1,82,70,270 /-** in respect of the imports at Port/ICD's viz. INMUN1 as indicated in **Annexure-Y** to the SCN, is liable to be recovered from **M/s Jenni Enterprises**, under Section 28(4) of the Customs Act, 1962 along with applicable interest under Section 28 AA ibid.

21C. In this Show Cause Notice, the demand of duty involved in the goods imported is in respect of multiple ports viz. INMUN1 and INAPL6. This Show Cause Notice is being issued by the competent authority at Customs Mundra Port (INMUN1) as per Notification No. 28/2022-Customs (N.T.) dated 31.03.2022 issued by Central Board of Indirect Taxes and Customs (CBIC) being the port i.e. Customs Mundra Port where highest duty is involved with respect to above firms.

Charging Section:

In respect of M/s Sada Steel Impex

22.1 Now, therefore **Shri Amit Gupta** proprietor of **M/s Sada Steel Impex (IEC-AYHPG1590N)** is hereby called upon to show cause to the Pr.

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Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why:

- i) The declared assessable value of the goods imported (through various Ports/ICD's as per **Annexure X**) totalling to **Rs 35,67,47,686/-** should not be rejected under Rule 12 of the Customs Valuation (Determination of Value of Imported Goods) Rules 2007 and re-determined as Rs. **50,65,67,966 /-**, in terms of Rule 3 and Rule 5 of the Customs Valuation (Determination of Value of Imported Goods) Rules, 2007 read with Section 14 of the Customs Act, 1962;
- ii) The classification of the impugned goods under CTH 72209022 in the Bills of Entry (as per **Annexure-X1**) should not be rejected and benefit of notification 50/2018-Customs dated 30.06.2018 not be denied and accordingly, imported goods should not be re-classified under CTH 72209090;
- iii) The goods mentioned at (i) above should not be held liable for confiscation under Section 111(m) of Customs Act 1962.
- iv) The goods mentioned at (ii) above should not be held liable for confiscation under Section 111 (m) & (o) of Customs Act 1962.
- v) The differential duty **Rs 4,81,80,851 /-** (as per **Annexure X**) on account of under-valuation and wrongful availment of concessional duty benefits under s.no.734 of notification no. 50/2018-customs dated 30.06.2018, should not be demanded and recovered from him under Section 28(4) of the Customs act 1962.
- vi) Interest under Section 28AA of the Customs Act, 1962 as applicable, should not be demanded and recovered from him.
- vii) Penalty should not be imposed upon Shri Amit Gupta under Section 114AA, Section 114A and/or Section 112(a)/(b) of Customs Act 1962 for an act of omission and commission discussed in the foregoing paras;

22.2 Now, therefore, in relation to the firm M/s Sada Steel Impex, Shri Atul Kishore Guglani resident of 318, Tarun Enclave, Pitampura, North West Delhi 110034 is hereby called upon to show cause to the Pr.Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why, penalty should not be imposed upon him under Section 112(a)&(b) and Section 114 AA of Customs Act for his acts of omissions & commissions, as brought out in the Show Cause Notice.

22.3 Now, therefore, in relation to the firm M/s Sada Steel Impex, Shri Mukesh Grover proprietor of M/s Mukesh Grover resident of 4/6, 8748, D.B. Gupta Road, Paharganj, New Delhi is hereby called upon to show cause to the

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Pr. Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why, penalty should not be imposed upon him under Section 112(a)&(b) and Section 114AA of Customs Act for his acts of omissions & commissions as brought out in the Show Cause Notice.

22.4 Now, therefore, in relation to the firm M/s Sada Steel Impex, Shri Arjun Guglani, Partner of M/s Total Cargo Services is hereby called upon to show cause to the Pr. Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why, penalty should not be imposed upon him under Section 112(a) and/or 112(b) and Section 114AA of Customs Act for his acts of omissions & commissions as brought out in the Show Cause Notice.

In respect of M/s Jenni Enterprises-

23.1 Now, therefore Shri Dheeraj Kumar Rao proprietor in M/s Jenni Enterprises (IEC CXKPK6240H); having registered address at L.G.F, FLAT NO 5 A-252, Building - 191, Neelkanth Palace Sant Nagar, East of Kailash, New Delhi, Delhi, 110065, hereby called upon to show cause to the Pr. Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why:

- i) The declared assessable value of Rs **10,53,77,767** /- of the imported goods, as per **Annexure Y**, should not be rejected under Rule 12 of the Customs Valuation (Determination of Value of Imported Goods) Rules 2007 and re-determined as Rs. **17,12,52,185** /-, in terms of Rule 3 and Rule 5 of the Customs Valuation (Determination of Value of Imported Goods) Rules, 2007 read with Section 14 of the Customs Act, 1962;
- ii) The goods mentioned at (i) above should not be held liable for confiscation under Section 111(m) of Customs Act 1962;
- iii) The differential duty Rs **1,82,70,270** /- (as per **Annexure Y**) on account of under-valuation should not be demanded and recovered from him under Section 28(4) of the Customs act 1962;
- iv) Interest under Section 28AA of the Customs Act, 1962 as applicable, should not be demanded and recovered from him;
- v) Penalty should not be imposed upon Shri Dheeraj Kumar Rao under Section 114AA, Section 114A and/or Section 112(a)/(b) of Customs Act 1962 for an act of omission and commission discussed in the foregoing paras.

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23.2 In relation to the firm M/s Jenni Enterprises (IEC CXKPK6240H), Shri Amit Gupta is hereby called upon to show cause to the Pr. Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why penalty should not be imposed upon him under Section 114AA, and Section 112(a)/(b) of Customs Act 1962 for the act of omission and commission discussed in the foregoing paras.

23.3. Now, therefore, in relation to the firm M/s Jenni Enterprises, Shri Atul Kishore Guglani resident of 318, Tarun Enclave, Pitampura, North West Delhi 110034 is hereby called upon to show cause to the Pr. Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why, penalty should not be imposed upon him under Section 112(a)&(b) and Section 114 AA of Customs Act for his acts of omissions & commissions, , as brought out in the Show Cause Notice.

23.4. Now, therefore, in relation to the firm M/s Jenni Enterprises, Shri Mukesh Grover proprietor of M/s Mukesh Grover resident of 4/6, 8748, D.B. Gupta Road, Paharganj, New Delhi is hereby called upon to show cause to the Pr. Commissioner/Commissioner, Mundra Customs within 30 days from the receipt of this Notice as to why, penalty should not be imposed upon him under Section 112(a)&(b) and Section 114AA of Customs Act for his acts of omissions & commissions, as brought out in the Show Cause Notice.

24. The Noticees should state in their written reply to this notice as to whether they desire to be heard in person. If no reply to this notice is received from them within 30 days from the date of receipt of this notice or if they fail to appear for the personal hearing on the date and time intimated to them, the case is liable to be decided ex parte based on evidence available on record without any further reference to them.

25. This notice is issued without prejudice to any other action that may be taken against the Noticees or any other person(s) under the provisions of the Customs Act, 1962 and the Rules & Regulations made thereunder or any other law for the time being in force.

26. Department reserves its rights to add, alter, amend, modify or supplement this Notice at any time on the basis of any evidence, material facts related to import of goods in question, which may come to the notice of the department after issuance of this notice and prior to the adjudication of the case. Further, this Show Cause Notice is only with respect to the issue in the instant case and the department reserves the right to issue Show Cause Notice on other issues relation to the above firms. This Show Cause Notice is issued without prejudice to any other action that may be taken against the persons/firms

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mentioned herein or any other person under the Customs Act 1962 or any other law for the time being in force.

27. A copy of the Show Cause Notice is also e-mailed to the notices at their mail ID as under in terms of clause (C) of sub-section 1 of Section 153 of the Customs Act 1962, so that such service through e-mail shall be deemed to have been received by the notices in terms of clause (C) of sub-section 1 of section 153 of the Customs Act 1962,

Encl: As above.

(Nitin Saini)

Commissioner of Customs

F.No. GEN/ADJ/COMM/660/2025-Adjn-O/o Pr Commr-Cus-Mundra

SCN No. 25/2025-26/COMM/N.S/ADJN/MCH

To:

- i) Shri Amit Gupta of M/s Sada Steel Impex A-30, First Floor Group Wazirpur Industial Area, New Delhi – 110052 (Email amitguptatinku@yahoo.com;))
- ii) Shri Dheeraj Kumar Rao, Proprietor of M/s Jenni Enterprises, L.G.F, Flat No 5 A-252, Building - 191, Neelkanth Palace Sant Nagar, East of Kailash, New Delhi, Delhi, 110065([Email: jenni2021dk@gmail.com](mailto:jenni2021dk@gmail.com) and singh.gur89@yahoo.com)
- iii) M/s Mukesh Grover (Shri Mukesh Grover), 4/6, 8748, D.B. Gupta Road, Paharganj, New Delhi. (Email sanjaygrover25@yahoo.com;))
- iv) Shri Atul Kishore Guglani, 318, Tarun Enclave, Pitampura, North West Delhi 110034 (Email a.k.enterprises310@gmail.com;))
- v) Shri Arjun Guglani, Partner of M/s Total Cargo Services S/o- Narender Kumar Guglani, aged 38 years, Partner M/s Total Cargo Services, situated at Neelkanth Place, Sant Nagar, New Delhi ([Email- guglani1985arjun@gmail.com](mailto:guglani1985arjun@gmail.com))

Copy to-

- i) The Pr. Additional Director General, Directorate of Revenue Intelligence (Hqrs.), 7th Floor, I.P. Bhawan, I.P. Estate, New Delhi.
- ii) The Additional Director (CI), Directorate of Revenue Intelligence (Hqrs.), 7th Floor, I.P. Bhawan, I.P. Estate, New Delhi.
- iii) The Superintendent(EDI) for uploading on the website of Ahmedabad Customs Zone- www.gujaratcustoms.gov.in

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LIST OF RUDs

RUD No.	Description of Document
RUD No 1 & 1A	ROP dated 18.04.2022 & 19.04.2022
RUD No 2	Panchnama dated 21.09.2021
RUD No 3	ROP dated 16.05.2023 & 17.05.2023
RUD No 4	Voluntarily submitted by Shri Pranshu Goel vide letter dated 17.11.2022
RUD No 5	Panchnama dated 16.11.2022
RUD No 5A	Show Cause Notice under Section 28(4) of the Customs Act 1962, bearing F.No. GEN/ADJ/COMM/526/2024-Adjn-O/o-Pr.Commr-Cus-Mundra dated 08.11.2024
RUD No 6	Panchnama dated 15.12.2023 of LGF Flat No. 05, A-252, Building No. 191, Neel Kanth Palace, Sant Nagar, East of Kailash, North East Delhi-South Delhi-110065
RUD No 7	Panchnama dated 16.12.2023/ 17.12.2023 of A-30 First Floor Group Wazirpur Industrial Area, New Delhi - 110052
RUD No 8	Panchnama dated 15.12.2023 at 4/6, D B Gupta Road, Paharganj Central Delhi, 110055
RUD No 9	Panchnama dated 15.12.2023 at 318, Tarun Enclave, Saraswati Vihar, Pitampura, Northwest Delhi, 110034
RUD No 10	Panchnama dated 15.12.2023 D-71, Flat No. 101, First Floor Vishwakarma Colony, Delhi
RUD No 11	SCN under F.No. CUS/APR/SCN/1659/2024-Gr 4-O/o Pr Commr-Cus-Mundra dated 13.12.2024
RUD No 12	Summon dated 15.12.2023,01.02.2024,18.04.2024,02.09.2024, 23.12.2024 & 01.08.2025 to Sh. Amit Gupta, Proprietor of M/s Sada Steel Impex
RUD No 13	Summon dated 22.02.2024,10.04.2024,23.04.2024,02.09.2024 & 23.12.2024 Shri Dheeraj Kumar Rao, Proprietor of M/s Jenni Enterprises
RUD No 14	Statement of shri Arjun Guglani(Partner M/s Total Cargo Service) dated 08.01.24

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RUD No 15	Statement of shri Arjun Guglani(Partner M/s Total Cargo Service) dated 30.05.24
RUD No 16	Statement of shri Arjun Guglani(Partner M/s Total Cargo Service) dated 06.10.2025
RUD No 17	Statement of Mukesh Grover (CHA, F-Card Holder) (R-13/2006) Prop. of M/s Mukesh Grover dated 20.12.2023
RUD No 18	Statement of Mukesh Grover (CHA, F-Card Holder) (R-13/2006) Prop. of M/s Mukesh Grover dated 21.12.2023
RUD No 19	Statement of Mukesh Grover (CHA, F-Card Holder) (R-13/2006) Prop. of M/s Mukesh Grover dated 03.01.2025
RUD No 20	Statement of Sh. Atul Kishore Guglani dated 05.01.2024
RUD No 21	Statement of Sh. Atul Kishore Guglani dated 02.01.2025
RUD No 22	Statement of Gaurav Khurana, Proprietor of M/s A G Enterprises dated 27.12.2024
RUD No 23	Statement of Shri Kartik Gupta Proprietor of M/s M K Industries dated 30.12.2024
RUD No 24	Statement of Sh. Rakesh Sharma of M/s M K Overseas dated 03.03.2025
RUD No 25	Retrieved genuine invoices in Past Investigation
RUD No 26	Record of all proceedings vide which the invoices were retrieved
RUD No 27	Statement of Vijay Goel, dated 16.11.2022, Controller of "M/s Mahadev ji exports"
RUD No 28	Statement of Vijay Goel, dated 17.11.2022, Controller of "M/s Mahadev ji exports"
RUD No 29	Statement of Pranshu Goel, dated 16.11.2022, Proprietor of "M/s Mahadev ji exports"
RUD No 30	Statement of Shri Deepak Jindal, dated 15.12.2023, proprietor of M/s Seeno Stainless Steel
RUD No 31	Statement of Shri Deepak Jindal, dated 06.02.2024, proprietor of M/s Seeno Stainless Steel

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RUD No 32	Statement of Shri Sandeep Garg, dated 15.12.2023, proprietor of M/s S S Enterprises
RUD No 33	Statement of Shri Sandeep Garg, dated 06.02.2024, proprietor of M/s S S Enterprises
RUD No 34	Statement of Shri Vikas Jindal, dated 13.02.2024, proprietor of M/s Royal Steel Trading
RUD No 35	Statement of Shri Gaurav Jindal dated 09.01.2024, proprietor of M/s Gemini Metal Corporation
RUD No 36	Statement of Shri Gaurav Jindal dated 04.03.2024, proprietor of M/s Gemini Metal Corporation
RUD No 37	Show Cause Notice (SCN) F.No. GEN/ADJ/ADC/2132/2023-Adjn dated. 15.11.2023
RUD No 38	OIO NO. MCH/ADC/AKM/258/2024-25 dated 20.01.2025 in respect of M/s Mahadev ji exports and others
RUD No 39	F.No. GEN/ADJ/COMM/526/2024-Adjn-O/o-Pr.Commr-Cus-Mundra dated 08.11.2024
RUD No 40	F.No. GEN/ADJ/COMM/582/2024-Adjn-O/o Pr Commr-Cus-Mundra dated 13.12.2024
RUD No 41	OIO No. KOL/CUS/Commissioner /Port/Adjn/22/2025 in respect of Gemini Metal Corporation dated 16.06.2025
RUD No 42	Statement of Sh. Atul Kishore Guglani dated 11.09.2025
RUD No 43	Statement of Mukesh Grover (CHA, F-Card Holder) (R-13/2006) Prop. of M/s Mukesh Grover dated 11.09.2025