

IAPPELLATE TRIBUNAL UNDER SAFEMA AT NEW DELHI

(1) MP-PBPT-2073/DLI/2025 (Review) MP-PBPT-2074/DLI/2025 (Exem.) MP-PBPT-2075/DLI/2025 (Stay) In FPA-PBPT-82/DLI/2024		
Shashi Kant Chaurasia	...	Appellant
(2) MP-PBPT-2070/DLI/2025 (Review) MP-PBPT-2071/DLI/2025 (Exem.) MP-PBPT-2072/DLI/2025 (Stay) In FPA-PBPT-81/DLI/2024		
Anand Kumar Chaurasia	...	Appellant
(3) MP-PBPT-2076/DLI/2025 (Review) MP-PBPT-2077/DLI/2025 (Exem.) MP-PBPT-2078/DLI/2025 (Stay) In FPA-PBPT-83/DLI/2024		
Dipti Chaurasia	...	Appellant
(4) MP-PBPT-2079/DLI/2025 (Review) MP-PBPT-2080/DLI/2025 (Exem.) MP-PBPT-2081/DLI/2025 (Stay) In FPA-PBPT-84/DLI/2024		
Vijay Anand Chaurasia	...	Appellant
(5) MP-PBPT-2082/DLI/2025 (Review) MP-PBPT-2083/DLI/2025 (Exem.) MP-PBPT-2084/DLI/2025 (Stay) In FPA-PBPT-85/DLI/2024		
Rajiv Chaurasia	...	Appellant
(6) MP-PBPT-2085/DLI/2025 (Review) MP-PBPT-2086/DLI/2025 (Exem.) MP-PBPT-2087/DLI/2025 (Stay) In FPA-PBPT-86/DLI/2024		
Vibha Arya Chaurasia	...	Appellant
(7) MP-PBPT-2088/DLI/2025 (Review) MP-PBPT-2089/DLI/2025 (Exem.) MP-PBPT-2090/DLI/2025 (Stay) In FPA-PBPT-87/DLI/2024		
Mayank Chaurasia	...	Appellant
(8) MP-PBPT-2091/DLI/2025 (Review) MP-PBPT-2092/DLI/2025 (Exem.) MP-PBPT-2093/DLI/2025 (Stay) In FPA-PBPT-94/DLI/2024		
Navneet Chaurasia	...	Appellant

(9) MP-PBPT-1866/DLI/2025 (Review)
MP-PBPT-1867/DLI/2025 (Exem.)
MP-PBPT-1868/DLI/2025 (Stay)
In FPA-PBPT-95/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(10) MP-PBPT-1869/DLI/2025 (Review)
MP-PBPT-1870/DLI/2025 (Exem.)
MP-PBPT-1871/DLI/2025 (Stay)
In FPA-PBPT-96/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(11) MP-PBPT-1872/DLI/2025 (Review)
MP-PBPT-1873/DLI/2025 (Exem.)
MP-PBPT-1874/DLI/2025 (Stay)
In FPA-PBPT-97/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(12) MP-PBPT-1875/DLI/2025 (Review)
MP-PBPT-1876/DLI/2025 (Exem.)
MP-PBPT-1877/DLI/2025 (Stay)
In FPA-PBPT-98/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(13) MP-PBPT-1878/DLI/2025 (Review)
MP-PBPT-1879/DLI/2025 (Exem.)
MP-PBPT-1880/DLI/2025 (Stay)
In FPA-PBPT-99/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(14) MP-PBPT-2094/DLI/2025 (Review)
MP-PBPT-2095/DLI/2025 (Exem.)
MP-PBPT-2096/DLI/2025 (Stay)
In FPA-PBPT-100/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(15) MP-PBPT-2097/DLI/2025 (Review)
MP-PBPT-2098/DLI/2025 (Exem.)
MP-PBPT-2099/DLI/2025 (Stay)
In FPA-PBPT-101/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

(16) MP-PBPT-1881/DLI/2025 (Review)
MP-PBPT-1882/DLI/2025 (Exem.)
MP-PBPT-1883/DLI/2025 (Stay)
In FPA-PBPT-102/DLI/2024

Shri Yogendra Raj Uttamraj Singhvi ... Appellant

**17. MP-PBPT-2100/DLI/2025 Review
MP-PBPT-2101/DLI/2025 Exem.
MP-PBPT-2102/DLI/2025 Stay
In FPA-PBPT-117/DLI/2024**

Yogi Diam ... Appellant

**18. MP-PBPT-2103/DLI/2025 Review
MP-PBPT-2104/DLI/2025 Exem.
MP-PBPT-2105/DLI/2025 Stay
In FPA-PBPT-118/DLI/2024**

Yogi Diam ... Appellant

**19. MP-PBPT-2106/DLI/2025 Review
MP-PBPT-2107/DLI/2025 Exem.
MP-PBPT-2108/DLI/2025 Stay
In FPA-PBPT-119/DLI/2024**

Yogi Diam ... Appellant

**20. MP-PBPT-2109/DLI/2025 Review
MP-PBPT-2110/DLI/2025 Exem.
MP-PBPT-2111/DLI/2025 Stay
In FPA-PBPT-120/DLI/2024**

Yogi Diam ... Appellant

**21. MP-PBPT-2112/DLI/2025 Review
MP-PBPT-2113/DLI/2025 Exem.
MP-PBPT-2114/DLI/2025 Stay
In FPA-PBPT-121/DLI/2024**

Yogi Diam ... Appellant

**22. MP-PBPT-2115/DLI/2025 Review
MP-PBPT-2116/DLI/2025 Exem.
MP-PBPT-2117/DLI/2025 Stay
In FPA-PBPT-122/DLI/2024**

Yogi Diam ... Appellant

**23. MP-PBPT-2121/DLI/2025 Review
MP-PBPT-2122/DLI/2025 Exem.
MP-PBPT-2123/DLI/2025 Stay
In FPA-PBPT-123/DLI/2024**

Yogi Diam ... Appellant

**24. MP-PBPT-2124/DLI/2025 Review
MP-PBPT-2125/DLI/2025 Exem.
MP-PBPT-2126/DLI/2025 Stay
In FPA-PBPT-124/DLI/2024**

Yogi Diam ... Appellant

**25. MP-PBPT-1884/DLI/2025 Review
MP-PBPT-1885/DLI/2025 Exem.
MP-PBPT-1886/DLI/2025 Stay
In FPA-PBPT-125/DLI/2024**

M/s. Garima Export ... Appellant

**26. MP-PBPT-1887/DLI/2025 Review
MP-PBPT-1888/DLI/2025 Exem.
MP-PBPT-1889/DLI/2025 Stay
In FPA-PBPT-126/DLI/2024**

M/s. Garima Export ... Appellant

**27. MP-PBPT-2839/DLI/2025 COD
MP-PBPT-2121/DLI/2025 Review
MP-PBPT-2122/DLI/2025 Exem.
MP-PBPT-2123/DLI/2025 Stay
In FPA-PBPT-127/DLI/2024**

M/s. Garima Export ... Appellant

**28. MP-PBPT-1893/DLI/2025 Review
MP-PBPT-1894/DLI/2025 Exem.
MP-PBPT-1895/DLI/2025 Stay
In FPA-PBPT-128/DLI/2024**

M/s. Garima Export ... Appellant

**29. MP-PBPT-1896/DLI/2025 Review
MP-PBPT-1897/DLI/2025 Exem.
MP-PBPT-1898/DLI/2025 Stay
In FPA-PBPT-129/DLI/2024**

M/s. Garima Export ... Appellant

**30. MP-PBPT-2842/DLI/2025 COD
MP-PBPT-2124/DLI/2025 Review
MP-PBPT-2125/DLI/2025 Exem.
MP-PBPT-2126/DLI/2025 Stay
In FPA-PBPT-130/DLI/2024**

M/s. Garima Export ... Appellant

**31. MP-PBPT-2127/DLI/2025 Review
MP-PBPT-2128/DLI/2025 Exem.
MP-PBPT-2129/DLI/2025 Stay
In FPA-PBPT-131/DLI/2024**

M/s. Garima Export ... Appellant

**32. MP-PBPT-1889/DLI/2025 Review
MP-PBPT-1890/DLI/2025 Exem.
MP-PBPT-1891/DLI/2025 Stay**

FPA-PBPT-82, 81, 83, 84, 85, 86, 87, 94,
95, 96, 97, 98, 99, 100, 101, 102/DLI/2024,
FPA-PBPT-117 to 140, 141 to 164, 165 to 170,
171 to 191/DLI/2024

In FPA-PBPT-132/DLI/2024

M/s. Garima Export ... Appellant

**33. MP-PBPT-2130/DLI/2025 Review
MP-PBPT-2131/DLI/2025 Exem.
MP-PBPT-2132/DLI/2025 Stay
In FPA-PBPT-133/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**34. MP-PBPT-2133/DLI/2025 Review
MP-PBPT-2134/DLI/2025 Exem.
MP-PBPT-2135/DLI/2025 Stay
In FPA-PBPT-134/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**35. MP-PBPT-2136/DLI/2025 Review
MP-PBPT-2137/DLI/2025 Exem.
MP-PBPT-2135/DLI/2025 Stay
In FPA-PBPT-135/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**36. MP-PBPT-1902/DLI/2025 Review
MP-PBPT-1903/DLI/2025 Exem.
MP-PBPT-1904/DLI/2025 Stay
In FPA-PBPT-136/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**37. MP-PBPT-1905/DLI/2025 Review
MP-PBPT-1906/DLI/2025 Exem.
MP-PBPT-1907/DLI/2025 Stay
In FPA-PBPT-137/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**38. MP-PBPT-2850/DLI/2025 COD
MP-PBPT-1908/DLI/2025 Review
MP-PBPT-1909/DLI/2025 Exem.
MP-PBPT-1910/DLI/2025 Stay
In FPA-PBPT-138/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**39. MP-PBPT-1911/DLI/2025 Review
MP-PBPT-1912/DLI/2025 Exem.
MP-PBPT-1913/DLI/2025 Stay
In FPA-PBPT-139/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**40. MP-PBPT-1914/DLI/2025 Review
MP-PBPT-1915/DLI/2025 Exem.**

**MP-PBPT-1916/DLI/2025 Stay
In FPA-PBPT-140/DLI/2024**

M/s. Gurudev Corporation ... Appellant

**41. MP-PBPT-1917/DLI/2025 Review
MP-PBPT-1918/DLI/2025 Exem.
MP-PBPT-1919/DLI/2025 Stay
In FPA-PBPT-141/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**42. MP-PBPT-2854/DLI/2025 COD
MP-PBPT-1920/DLI/2025 Review
MP-PBPT-1921/DLI/2025 Exem.
MP-PBPT-1922/DLI/2025 Stay
In FPA-PBPT-142/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**43. MP-PBPT-1923/DLI/2025 Review
MP-PBPT-1924/DLI/2025 Exem.
MP-PBPT-1925/DLI/2025 Stay
In FPA-PBPT-143/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**44. MP-PBPT-1926/DLI/2025 Review
MP-PBPT-1927/DLI/2025 Exem.
MP-PBPT-1928/DLI/2025 Stay
In FPA-PBPT-144/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**45. MP-PBPT-1929/DLI/2025 Review
MP-PBPT-1930/DLI/2025 Exem.
MP-PBPT-1931/DLI/2025 Stay
In FPA-PBPT-145/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**46. MP-PBPT-1932/DLI/2025 Review
MP-PBPT-1933/DLI/2025 Exem.
MP-PBPT-1934/DLI/2025 Stay
In FPA-PBPT-146/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**47. MP-PBPT-1935/DLI/2025 Review
MP-PBPT-1936/DLI/2025 Exem.
MP-PBPT-1937/DLI/2025 Stay
In FPA-PBPT-147/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

48. MP-PBPT-1938/DLI/2025 Review

**MP-PBPT-1939/DLI/2025 Exem.
MP-PBPT-1940/DLI/2025 Stay
In FPA-PBPT-148/DLI/2024**

M/s Khusboo Diamond Pvt. Ltd. ... Appellant

**49. MP-PBPT-2139/DLI/2025 Review
MP-PBPT-2140/DLI/2025 Exem.
MP-PBPT-2141/DLI/2025 Stay
InFPA-PBPT-149/DLI/2024**

M/s Chintamani Export ... Appellant

**50. MP-PBPT-1941/DLI/2025 Review
MP-PBPT-1942/DLI/2025 Exem.
MP-PBPT-1943/DLI/2025 Stay
InFPA-PBPT-150/DLI/2024**

M/s Chintamani Export ... Appellant

**51. MP-PBPT-1944/DLI/2025 Review
MP-PBPT-1945/DLI/2025 Exem.
MP-PBPT-1946/DLI/2025 Stay
InFPA-PBPT-151/DLI/2024**

M/s Chintamani Export ... Appellant

**52. MP-PBPT-2142/DLI/2025 Review
MP-PBPT-2143/DLI/2025 Exem.
MP-PBPT-2144/DLI/2025 Stay
InFPA-PBPT-152/DLI/2024**

M/s Chintamani Export ... Appellant

**53. MP-PBPT-1947/DLI/2025 Review
MP-PBPT-1948/DLI/2025 Exem.
MP-PBPT-1949/DLI/2025 Stay
InFPA-PBPT-153/DLI/2024**

M/s Chintamani Export ... Appellant

**54. MP-PBPT-2145/DLI/2025 Review
MP-PBPT-2146/DLI/2025 Exem.
MP-PBPT-2147/DLI/2025 Stay
InFPA-PBPT-154/DLI/2024**

M/s Chintamani Export ... Appellant

**55. MP-PBPT-1950/DLI/2025 Review
MP-PBPT-1951/DLI/2025 Exem.
MP-PBPT-1952/DLI/2025 Stay
InFPA-PBPT-155/DLI/2024**

M/s Chintamani Export ... Appellant

FPA-PBPT-82, 81, 83, 84, 85, 86, 87, 94,
95, 96, 97, 98, 99, 100, 101, 102/DLI/2024,
FPA-PBPT-117 to 140, 141 to 164, 165 to 170,
171 to 191/DLI/2024

**56. MP-PBPT-2148/DLI/2025 Review
MP-PBPT-2149/DLI/2025 Exem.
MP-PBPT-2150/DLI/2025 Stay
InFPA-PBPT-156/DLI/2024**

M/s Chintamani Export ... Appellant

**57. MP-PBPT-1953/DLI/2025 Review
MP-PBPT-1954/DLI/2025 Exem.
MP-PBPT-1955/DLI/2025 Stay
InFPA-PBPT-157/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**58. MP-PBPT-1956/DLI/2025 Review
MP-PBPT-1957/DLI/2025 Exem.
MP-PBPT-1958/DLI/2025 Stay
InFPA-PBPT-158/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**59. MP-PBPT-1959/DLI/2025 Review
MP-PBPT-1960/DLI/2025 Exem.
MP-PBPT-1961/DLI/2025 Stay
InFPA-PBPT-159/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**60. MP-PBPT-2151/DLI/2025 Review
MP-PBPT-2152/DLI/2025 Exem.
MP-PBPT-2153/DLI/2025 Stay
InFPA-PBPT-160/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**61. MP-PBPT-1962/DLI/2025 Review
MP-PBPT-1963/DLI/2025 Exem.
MP-PBPT-1964/DLI/2025 Stay
InFPA-PBPT-161/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**62. MP-PBPT-1965/DLI/2025 Review
MP-PBPT-1966/DLI/2025 Exem.
MP-PBPT-1967/DLI/2025 Stay
In FPA-PBPT-162/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**63. MP-PBPT-1968/DLI/2025 Review
MP-PBPT-1969/DLI/2025 Exem.
MP-PBPT-1970/DLI/2025 Stay
InFPA-PBPT-163/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

FPA-PBPT-82, 81, 83, 84, 85, 86, 87, 94,
95, 96, 97, 98, 99, 100, 101, 102/DLI/2024,
FPA-PBPT-117 to 140, 141 to 164, 165 to 170,
171 to 191/DLI/2024

**64. MP-PBPT-1971/DLI/2025 Review
MP-PBPT-1972/DLI/2025 Exem.
MP-PBPT-1973/DLI/2025 Stay
In FPA-PBPT-164/DLI/2024**

M/s Uttam Gems Pvt. Ltd. ... Appellant

**65. MP-PBPT-1974/DLI/2025 Review
MP-PBPT-1975/DLI/2025 Exem.
MP-PBPT-1976/DLI/2025 Stay
In FPA-PBPT-165/DLI/2024**

M/s. Manmohan Export Pvt. Ltd. ... Appellant

**66. MP-PBPT-1977/DLI/2025 Review
MP-PBPT-1978/DLI/2025 Exem.
MP-PBPT-1979/DLI/2025 Stay
In FPA-PBPT-166/DLI/2024**

M/s. Manmohan Export Pvt. Ltd. ... Appellant

**67. MP-PBPT-2154/DLI/2025 Review
MP-PBPT-2154/DLI/2025 Exem.
MP-PBPT-2156/DLI/2025 Stay
In FPA-PBPT-167/DLI/2024**

M/s. Manmohan Export Pvt. Ltd. ... Appellant

**68. MP-PBPT-1980/DLI/2025 Review
MP-PBPT-1981/DLI/2025 Exem.
MP-PBPT-1982/DLI/2025 Stay
In FPA-PBPT-168/DLI/2024**

M/s. Manmohan Export Pvt. Ltd. ... Appellant

**69. MP-PBPT-1983/DLI/2025 Review
MP-PBPT-1984/DLI/2025 Exem.
MP-PBPT-1985/DLI/2025 Stay
In FPA-PBPT-169/DLI/2024**

M/s. Manmohan Export Pvt. Ltd. ... Appellant

**70. MP-PBPT-1986/DLI/2025 Review
MP-PBPT-1987/DLI/2025 Exem.
MP-PBPT-1988/DLI/2025 Stay
In FPA-PBPT-170/DLI/2024**

M/s. Manmohan Export Pvt. Ltd. ... Appellant

**71. MP-PBPT-1989/DLI/2025 Review
MP-PBPT-1990/DLI/2025 Exem.
MP-PBPT-1991/DLI/2025 Stay
In FPA-PBPT-171/DLI/2024**

M/s Manmohan Export Pvt. Ltd. ... Appellant

72. MP-PBPT-1992/DLI/2025 Review

FPA-PBPT-82, 81, 83, 84, 85, 86, 87, 94,
95, 96, 97, 98, 99, 100, 101, 102/DLI/2024,
FPA-PBPT-117 to 140, 141 to 164, 165 to 170,
171 to 191/DLI/2024

**MP-PBPT-1993/DLI/2025 Exem.
MP-PBPT-1994/DLI/2025 Stay
In FPA-PBPT-172/DLI/2024**

M/s Manmohan Export Pvt. Ltd. ... Appellant

**73. MP-PBPT-1995/DLI/2025 Review
MP-PBPT-1996/DLI/2025 Exem.
MP-PBPT-1997/DLI/2025 Stay
In FPA-PBPT-173/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**74. MP-PBPT-1998/DLI/2025 Review
MP-PBPT-1999/DLI/2025 Exem.
MP-PBPT-2000/DLI/2025 Stay
In FPA-PBPT-174/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**75. MP-PBPT-2157/DLI/2025 Review
MP-PBPT-2158/DLI/2025 Exem.
MP-PBPT-2159/DLI/2025 Stay
In FPA-PBPT-175/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**76. MP-PBPT-2001/DLI/2025 Review
MP-PBPT-2002/DLI/2025 Exem.
MP-PBPT-2003/DLI/2025 Stay
In FPA-PBPT-176/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**77. MP-PBPT-2004/DLI/2025 Review
MP-PBPT-2005/DLI/2025 Exem.
MP-PBPT-2006/DLI/2025 Stay
In FPA-PBPT-177/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**78. MP-PBPT-2007/DLI/2025 Review
MP-PBPT-2008/DLI/2025 Exem.
MP-PBPT-2009/DLI/2025 Stay
In FPA-PBPT-178/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**79. MP-PBPT-2010/DLI/2025 Review
MP-PBPT-2011/DLI/2025 Exem.
MP-PBPT-2012/DLI/2025 Stay
In FPA-PBPT-179/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**80. MP-PBPT-2013/DLI/2025 Review
MP-PBPT-2014/DLI/2025 Exem.
MP-PBPT-2015/DLI/2025 Stay
In FPA-PBPT-180/DLI/2024**

M/s Shrenik Diamond Pvt. Ltd. ... Appellant

**81. MP-PBPT-2016/DLI/2025 Review
MP-PBPT-2017/DLI/2025 Exem.
MP-PBPT-2018/DLI/2025 Stay
In FPA-PBPT-181/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**82. MP-PBPT-2019/DLI/2025 Review
MP-PBPT-2020/DLI/2025 Exem.
MP-PBPT-2021/DLI/2025 Stay
In FPA-PBPT-182/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**83. MP-PBPT-2022/DLI/2025 Review
MP-PBPT-2023/DLI/2025 Exem.
MP-PBPT-2024/DLI/2025 Stay
In FPA-PBPT-183/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**84. MP-PBPT-2160/DLI/2025 Review
MP-PBPT-2161/DLI/2025 Exem.
MP-PBPT-2162/DLI/2025 Stay
In FPA-PBPT-184/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**85. MP-PBPT-2163/DLI/2025 Review
MP-PBPT-2164/DLI/2025 Exem.
MP-PBPT-2165/DLI/2025 Stay
FPA-PBPT-185/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**86. MP-PBPT-2025/DLI/2025 Review
MP-PBPT-2026/DLI/2025 Exem.
MP-PBPT-2027/DLI/2025 Stay
In FPA-PBPT-186/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**87. MP-PBPT-2028/DLI/2025 Review
MP-PBPT-2029/DLI/2025 Exem.
MP-PBPT-2030/DLI/2025 Stay
In FPA-PBPT-187/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**88. MP-PBPT-2166/DLI/2025 Review
MP-PBPT-2167/DLI/2025 Exem.
MP-PBPT-2168/DLI/2025 Stay
In FPA-PBPT-188/DLI/2024**

M/s Bhairav Gems Pvt. Ltd. ... Appellant

**89. MP-PBPT-2031/DLI/2025 Review
MP-PBPT-2032/DLI/2025 Exem.
MP-PBPT-2033/DLI/2025 Stay
In FPA-PBPT-189/DLI/2024**

M/s Glossy Gems Pvt. Ltd. ... Appellant

**90. MP-PBPT-2034/DLI/2025 Review
MP-PBPT-2035/DLI/2025 Exem.
MP-PBPT-2036/DLI/2025 Stay
In FPA-PBPT-190/DLI/2024**

M/s Glossy Gems Pvt. Ltd. ... Appellant

**91. MP-PBPT-2037/DLI/2025 Review
MP-PBPT-2038/DLI/2025 Exem.
MP-PBPT-2039/DLI/2025 Stay
In FPA-PBPT-191/DLI/2024**

M/s Glossy Gems Pvt. Ltd. ... Appellant

v/s

The Initiating Officer, BPU, Delhi ... Respondent

Advocates/Authorized Representatives who appeared

For the Appellant : Mr. Rohit Jain, Mr. Saksham Singhal,
Mr. Nikunj Maheshwari, Advocates
(For Sr. No. 01 to 08)
Mr. Abhijeet Varshney,
Mr. Deepak Agarwal,
Mr. Sumit K. Sharma, Advocates
(For Sr. No. 09 to 18)
Shri Arun Kumar Agarwal,
Shubham Agarwal, Advocates
(For Sr. No. 19 to 93)

For the Respondent : Shri Kanhaiya Singhal, S.P.P.

CORAM

JUSTICE MUNISHWAR NATH BHANDARI : CHAIRMAN
SHRI V. ANANDARAJAN : MEMBER

FINAL ORDER
09.02.2026

Batch of Review Petition have been filed under section 47 of Prohibition of Benami Property Transaction Act, 1988 (in short, the Act of 1988) against the order dated 14-01-2025 passed by this Tribunal. The orders sought to be reviewed was passed in appeals preferred by the non-applicants challenging the order of Adjudicating Authority confirming the provisional attachment of the property. The Adjudicating Authority found a case of benami transaction. However, the finding recorded by the Authority was challenged by the non-applicant in batch of appeals. After considering the rival submission, this Tribunal allowed the appeals and accordingly the order passed by the Adjudicating Authority was set aside. It was concluded that the case does not involve benami transaction as defined under the Act of 1988 and therefore there was no reason to provisionally attach the properties belonging to the appellant.

2. The facts of the case were narrated in the impugned order and stated that the appellants pursuant to the scheme framed by the Government of India by the name of “Income Declaration Scheme, 2016” made declaration of possession of 12,857.07 carats of rough diamonds of a value of Rs. 49,42,79,680/- being “undisclosed income” received by way of gift/inheritance and were with the appellant since 1994. The declaration aforesaid was made under section 183 of the Finance Act, 2016 and was acknowledged and accepted by the Principal Commissioner of Income Tax, New Delhi. The certificate was issued on 07.10.2017 on Form No. 4. The appellant Shashi Kant Chaurasia paid the tax and surcharges apart from penalty @ of the 45% on the un-disclosed income. He accordingly made the payment of tax of Rs. 22,24,25,856/- in terms of section 184-185 of the Finance Act, 2016.

3. The rough diamonds were subsequently processed through core job workers in Surat and appellant thereupon sold these diamonds in the financial year 2018-19 to 2021-22

to different persons/firms and received a sum of Rs. 360,25,10,100/- on which he paid tax of Rs. 82,89,85,671/-.

4. The review applicant conducted a search operation on the office premises of “Kamla Pasand Group” wherein statement of Yogendra Raj Singhvi was recorded. The consideration received by the appellant/non applicants out of sale of diamond was used for purchase of properties and taking it to be a case of benami transaction, an order for provisional attachment of the property was caused. The allegation levelled was that the beneficial owner generated the funds by putting cash in the bank account and later on transferred it to the benamidar and thereby a case of benami transaction was made out.

5. The Tribunal did not find any evidence or proof for deposit of cash by the noticee so as to satisfy first limb of the benami transaction. On the contrary, it was found that amount was deposited in the bank account after sale of polished diamonds and the Review Applicant did not question the sale of the said diamonds by the non applicants and

accordingly, the order sought to be reviewed was passed by the Tribunal. This order also addressed the legal issues in reference to section 24 (1) and 24 (4) of the Act of 1988.

Argument of the Review Applicants

6. The learned counsel for the Review Applicant submitted that there was no illegality in provisionally attaching the properties which were not disclosed in the notice under section 24 (1) of the Act of 1988. It was permissible under section 24 (4) of the Act of 1988 pursuant to which notice was caused and thereupon the Adjudicating Authority passed the order confirming the provisionally attachment of the property.

7. The findings recorded by this tribunal needs to be reviewed because there was no illegality in the action of the respondent to provisionally attach the property over and above referred in the notice under section 24 (1) of the Act of 1988.

8. The second argument to seek review of the impugned order was in reference to the statement of Yogendra Raj

Singhvi who is said to have retracted his statements. No justifiable reason for retraction was given. Thus, his statement could not be ignored by this Tribunal. It is more so when he had admitted flow of cash and deposit in the bank account through Angadiyas. His statement was sufficient to prove flow of cash to route it in the bank account of the firm/individual for future benefit of the beneficial owner. The statement of Yogendra Raj Singhavi has been ignored by the Tribunal on the ground that he retracted his statement, thus could not have been relied upon unless there existed corroborative evidence. If there remains no justification for retraction of the statement, it can be relied upon without corroborative evidence.

9. In view of the above also, the impugned order needs to be reviewed.

10. It was lastly contended that the declaration of undisclosed income under the scheme of 2016 was not accepted by the Assessing Authority under the Income Tax Act. It was taken out of forgery, thus the declaration followed by a

certificate is to be taken as null and void. The prayer was made to cause review on the issues raised above.

Findings of the Appellate Tribunal

11. We have considered the submission made by the counsel for the Review Applicant and perused the record. The Review Petition can be taken up and accepted only when a case is made out to show an error on the face of the record or there exist manifest error in passing the order. It can also be taken up when relevant issue raised before the Court/Tribunal remains un-attended and accordingly finding is not recorded. There can be such similar issues on which review of the order can be sought. However, jurisdiction to cause review is very limited and has been held by the Apex Court in the recent judgement of **Govt. of NCT of Delhi Vs. K.L Rathi Steels Ltd. reported in (2024) 7 SCC 315**. The review cannot be taken a substitute of an appeal. The relevant para of the judgement of the Apex Court in the case K L Rathi are quoted here under:-

39. Order XLVII does not end with the circumstances as section 114, CPC, the substantive provision, does. Review power under section 114 read with

Order XLVII, CPC is available to be exercised, subject to fulfilment of the above conditions, on setting up by the review petitioner any of the following grounds: (i) discovery of new and important matter or evidence; or (ii) mistake or error apparent on the face of the record; or (iii) any other sufficient reason.

40. Insofar as (i) (supra) is concerned, the review petitioner has to show that such evidence (a) was actually available on the date the court made the order/decreed, (b) with reasonable care and diligence, it could not be brought by him before the court at the time of the order/decreed, (c) it was relevant and material for a decision, and (d) by reason of its absence, a miscarriage of justice has been caused in the sense that had it been produced and considered by the court, the ultimate decision would have been otherwise.

41. Regarding (ii) (supra), the review petitioner has to satisfy the court that the mistake or error committed by it is self-evident and such mistake or error can be pointed out without any long-drawn process of reasoning; and, if such mistake or error is not corrected and is permitted to stand, the same will lead to a failure of justice. There cannot be a fit-in-all definition of “mistake or error apparent on the face of the record” and it has been considered prudent by the courts to determine whether any mistake or error does exist considering the facts of each individual case coming before it.

42. With regard to (iii) (supra), we can do no better than refer to the traditional view in Chhajju Ram (supra), a decision of a Bench of seven Law Lords of the Judicial Committee of the Privy Council. It was held there that the words “any other sufficient reason” means “a reason sufficient on grounds at least analogous to those specified immediately previously”, meaning thereby (i) and (ii) (supra). Notably, Chhajju Ram (supra) has been consistently followed by this Court in a number of decisions starting with Moran Mar Basselios Catholics v. Most Rev. Mar Poulouse Athanasius.

101. However, with utmost respect, we do not find any of those decisions, which have taken an expansive view, looking at such ground in the manner we propose to look, for recording our concurrence with the view in Chhajju Ram (supra) that has unhesitatingly been followed over the years. If indeed “any other sufficient reason” were to take within its embrace any situation not analogous to “discovery of new matter or evidence” and “on account of some mistake or error apparent on the face of the record”, we wonder why the legislature chose to keep “any other sufficient reason” immediately after the aforesaid two grounds. If “any other sufficient reason” were to be read independent of the said two grounds, we believe the long line in Rule 1 after clauses (a) to (c) need not have been drafted in the manner it presently reads. In lieu of referring to the said two grounds as grounds on which a review could be sought, the legislature could well have kept it open ended as in section 5 of the Limitation Act, 1963 where it is provided, without any strings attached, that any appeal or any application may be admitted after the prescribed period of limitation if the appellant or applicant satisfies the court that VERDICTUM.IN Page 69 of 90 he had “sufficient cause” for not preferring the appeal or the application earlier. If the intention of the legislature were to give an expanded meaning, Order XLVII Rule 1 would have read somewhat like this: any person considering himself aggrieved by a decree or order or decision of the nature indicated in clauses (a), (b) and (c) for any sufficient reason desires to obtain a review of the decree or order made against him, may apply for a review. But that is not what the provision says and means. Reading Order XLVII Rule 1 in juxtaposition to section 5 of the Limitation Act drives us to accept the view in Chhajju Ram (supra) as having interpreted the

law correctly and acceptance of the same by this Court and high courts over the years, coupled with the fact that the Parliament did not consider it necessary to amend Rule 1 when it inserted the Explanation in 1976. Giving a wider meaning to the ground “any other sufficient reason” in Netaji Cricket Club (supra) and Jagmohan Singh (supra), therefore, must have been intended and necessitated by this Court because the justice of the cases so demanded but the same would have no application in a case of this nature.

12. There exist limited jurisdiction to review the order. It can be allowed when there remains a manifest error apparent on the face of the record or non consideration of the issue despite being raised and other similar grounds. It can also be considered if a new fact comes up going deep into the matter which was not in the knowledge of the Review Applicant or was not available. A case of that nature is not made out, however, we would consider each issue separately on which the review application has been pressed.

13. We would take up the first issue in reference to the facts of this case. The counsel for the review applicant submitted that the declaration of rough diamond under “Income Declaration Scheme, 2016” was not accepted subsequently by the Assessing Authority under section 153 of the Income Tax Act. It was found to be out of fraud and thereby declaration to be null and void. The learned counsel for the review applicant

was asked to invite the clause or any para of the scheme which gave jurisdiction to the Assessing Authority to nullify the certificate issued by the Principal Commissioner, Income Tax under the scheme of 2016 followed by a certification and deposit of the tax on the undisclosed income. It was 45% to the amount of un-disclosed income and thereupon when appellant/non-applicant gained income out of further transaction, they were subjected to tax compliances and which have been fulfilled. The counsel for the review applicant could not show authority, vested in the Assessment Authority to nullify the certificate issued by the Principal Commissioner under the Scheme of 2016. It was more so when the valuation of the rough diamond was certified by the Registered Valuer and has not been questioned. In fact, this Tribunal was inclined to make comments on the action of the Assessing Authority to nullify the certificate issued by the Chief Commissioner under the scheme of 2016 but since the matter is very old, we refrained to do so.

14. The learned counsel for the Review applicant could not show an opportunity of hearing by the Assessing Authority to the non applicant before holding declaration to be out of forgery. It was admitted that no notice was given by the Assessment Authority to the assessee and thereby also suffers even from violation of the principle of natural justice and thus cannot be relied upon. The order of the Assessing Authority does not demonstrate the ground to hold certificate of undisclosed income to be out of fraudulent act of the appellant/non-applicants. Thus, the first limb of the Review application is not made out in the light of the facts given above.

15. The declaration of rough diamonds to be undisclosed income was otherwise taken to be first part of the chain of transaction and we do not find that the review applicant could demolish it.

16. The fact further remains that after the payment of tax of 45% under the scheme of 2016, the appellant/non applicant sold the diamonds and received the consideration. It is said to

be by putting cash in the bank account. However, the counsel for the review applicant could not show any evidence to substantiate the allegation other than the statement of Yogendra Raj Singhvi. He retracted the statement immediately after its recording during the period of the marriage of his daughter. Yet, retracted statement has been relied by the respondents without corroborative evidence. The allegation against the appellant/non-applicant is for putting cash in the bank account to rotate it making out a case of benami transaction. The allegation for deposit of cash could not be proved by the review applicant by producing the bank statement. Yogendra Raj Singhvi, no doubt made a statement about rotation of cash but he retracted the statement recorded under section 131 of IT Act.

17. The learned counsel for the review applicant could not clarify as to why the bank statement to show deposit of cash could not be produced to bring corroborative evidence despite onus of proof on the review applicant. Therefore, we do not find a case based on foundational fact to make out a case of

benami transaction and in view of it, the provisional attachment of the property could not have been caused and at this stage, if we accept the argument of the review applicant in reference to section 24 (4) for causing provisional attachment of the properties over and above indicated in the notice under section 24 (1) of the Act of 1988, the outcome is not going to change.

18. In view of the above discussion, we do not find a case to cause review of the order and otherwise the arguments raised by the review applicants does not show a manifest error apparent from the face of the record so as to review the order.

19. In the light of the aforesaid, all the review applications fail and are dismissed.

(Justice Munishwar Nath Bhandari)
Chairman

(V. Anandarajan)
Member

New Delhi,
09th February, 2026
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