

**CHART DISCLOSING PARTICULARS OF REFUNDS RECEIVED BY CUSTODIAN
FROM THE INCOME TAX DEPARTMENT ON BEHALF OF MEHTAS**

Sr. No.	Name of the Entity	Asst. Year	Refund Under Order Dated	Amount of Refund	Letter Dated
1	Jyoti H. Mehta	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	1,53,90,65,967	24.07.2017
2	Pratima H. Mehta	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	24,40,08,702	24.07.2017
3	Pratima H. Mehta	1993-94	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	3,08,27,666	24.07.2017
4	Deepika A. Mehta	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	27,45,23,854	24.07.2017
5	Hitesh S. Mehta	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	22,77,18,521	24.07.2017
6	Hitesh S. Mehta	1993-94	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	15,47,82,579	24.07.2017
7	Rasila S. Mehta	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	21,39,07,482	24.07.2017
8	Sudhir S. Mehta	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	21,91,42,814	24.07.2017
9	Aatur Holdings Pvt. Ltd.	1993-94	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	20,22,159	24.07.2017
10	Aatur Holdings Pvt. Ltd.	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	1,81,88,386	24.07.2017
11	Growmore Leasing & Investment Ltd.	1992-93	02.05.2017 in CA 6323 of 2010 of Hon'ble Supreme Court	37,29,48,029	24.07.2017
12	Jyoti H. Mehta	1992-93	ITAT Order dated 14.01.2019	4,76,63,52,276	27.09.2019
13	Ashwin S. Mehta	1993-94	ITAT Order dated 14.01.2019	7,98,12,740	12.12.2019
Say Rs.814.33 Crores				Total:	8,14,33,01,175

- That admittedly since 2000 the Mehtas have started getting reliefs from the Hon'ble CIT(A) and Hon'ble ITAT who have been pleased to delete several false additions and therefore u/s 240 of the Income Tax Act and in compliance with several circulars issued by the Central Board of Direct Taxes (CBDT) the department should issue the Order Giving Effect (OGE) as also the refund even without the assessee seeking the same.
- Since in case of Mehtas the department has secured release of entire amount representing the demands for tax under the Torts Act by executing an Undertaking to unconditionally bring back the amounts with interest. It became an additional obligation on the I.T. department to come forward and return the amounts back to Hon'ble Special Court and Custodian after the reliefs were granted to Mehtas but yet has failed to comply both with the provisions of the Income Tax Act as also with the express orders passed under the Torts Act so as to illegally enjoy Rs.3285.46 Crores released to the department from the accounts of Mehtas.
- Since refunds were not being offered and liabilities were not being reduced by passing OGEs, Mehtas filed Applications before Hon'ble Special Court to seek the refunds but for 5 years and despite the Applications refunds were not offered by the department.
- Only when the sale of residential flats was pressed for by the Custodian before Hon'ble Supreme Court and the Income Tax department supported it, the above facts were placed before Hon'ble Supreme Court and it intervened and directed the I.T. department by an order dated 02.05.2017 in CA 6326 of 2010 to make the refund with interest and accordingly Rs.329.71 Crores were then paid by the I.T. department to the Custodian on behalf of Mehtas. However, further refunds of Rs.5500 Crores are presently pending and not being refunded for past some years.
- Refunds at Item Nos.12 and 13 were made by the department in compliance with order of Hon'ble ITAT dated 14.01.2019 but large refunds due to late Shri Harshad Mehta and Shri Ashwin Mehta are yet not made.