

Director General of Anti-Profiteering v. Mantri Castles Private Limited (renamed as Castle Vista Private Limited)

Case number: NAPA/27/PB/2025

Citation: No neutral or reporter citation printed in the identified official order.

Decision date: 10 February 2026

Mantri Serenity: no additional ITC benefit found after the credit-to-purchase ratio declined

Court: Goods and Services Tax Appellate Tribunal, Principal Bench, New Delhi, Anti-Profiteering Division

Bench: Shri Anil Kumar Gupta, Member (Technical), Court No. 3

Decision stage: Final reasoned no-contravention disposal accepting the reinvestigation report for Mantri Serenity; renamed respondent and signature-date distinction retained.

01 Facts of case and issues

A homebuyer alleged profiteering in construction services for Mantri Serenity at Kanakpura Main Road, Bangalore. The Standing Committee reference was received on 30 May 2022, and DGAP submitted an initial report to NAA on 27 September 2022. The matter was subsequently pending before CCI.

Following the Delhi High Court's 29 January 2024 judgment in W.P.(C) 7743/2019, the order records a CCI direction dated 21 March 2024 for reinvestigation under Rule 129. DGAP submitted its revised report dated 10 October 2024 to the Principal Bench. The stated current investigation period was 1 July 2017 to 31 March 2024.

Pinpoint: Paragraphs 1–4, physical p. 2.

02 Discussion by Hon'ble Tribunal

DGAP compared credit availed with purchase value, reporting 13.57% before GST and 11.04% after GST. The difference is minus 2.53 percentage points. On that comparison, it concluded that no additional ITC benefit had accrued after GST commenced. The short order reports the ratios but does not reproduce the underlying credit and purchase ledgers.

After notice dated 10 November 2025 and hearings on 9 January, 3 February and 10 February 2026, neither private party had filed written submissions or appeared. GSTAT expressly accepted the 10 October 2024 report and its no-contravention conclusion. This is substantive adoption of the investigated outcome, not merely a dismissal for non-appearance.

The earlier NAA report and CCI reinvestigation direction are history. The Tribunal did not direct another remand. Its acceptance of this project's negative ratio difference is not a universal computational rule or clearance of every Mantri-branded project.

Pinpoint: Ratios and inference: paragraph 5, physical pp. 2–3. Notice, hearings and Tribunal acceptance: paragraphs 6–9, physical p. 3.

03 Judicial decision and operative relief

GSTAT accepted the DGAP investigation report dated 10 October 2024 concluding that Section 171 had not been contravened, and disposed of the matter. Copies were to be supplied to the parties and concerned CGST/SGST Commissioners. No refund, fund deposit, interest or penalty was directed.

The printed order/form and pronouncement date are 10 February 2026. The digital-signature stamp on the final page records 11 February 2026; the signature timestamp is retained separately and is not treated as a second decision.

Pinpoint: Paragraphs 8–11 and date/signature block, physical p. 3; administrative form, physical pp. 1–2.

04 In favour of

Mantri Castles Private Limited, described in the source as renamed Castle Vista Private Limited, for Mantri Serenity and the investigated record. No general clearance of other projects or related entities.

Final project-specific no-contravention disposal based on acceptance of the revised DGAP report; the CCI remand belongs to prior history.

Pinpoint: Paragraphs 4–9, physical pp. 2–3.

05 AKHB REVIEW POINT

AKHB analysis: Check that the credit numerator, purchase-value denominator, investigation period and project boundary match before relying on a ratio decline. The reported 2.53 difference is a percentage-point change, not a 2.53% relative reduction. Retain the full investigation report and ledger reconciliation.

Preserve the respondent's renamed identity as printed, without assuming that other companies using the Mantri name share its legal identity or project accounts. The order is not a company-wide tax clearance.

Use 10 February 2026 as the printed decision date while retaining the 11 February signature timestamp. Do not convert non-appearance into a substitute for the substantive no-benefit conclusion that GSTAT actually adopted.

Pinpoint: AKHB commentary based on caption/form, physical p. 1, and paragraphs 4–11/date block, physical pp. 2–3. Recommendations are distinct from the Tribunal's holding.

Sources and limitations

Relevant provisions

CGST Act 2017: Section 171; CGST Rules 2017: Rule 129; CGST Act 2017: Sections 109 and 171(2), institutional/current-law context; Central Tax Notifications 18/2024 and 19/2024, empowerment and new-request-cutoff context.

Statutory note

Checked 13 October 2026. Section 171(1) requires the benefit of a tax-rate reduction or ITC to be passed to recipients through commensurate price reduction. Notification 18/2024-Central Tax, issued under Section 171(2) read with Section 109(1) and the second proviso to Section 109(5), empowers the Principal Bench constituted under Section 109(3) from 1 October 2024. Notification 19/2024-Central Tax fixes 1 April 2025 as the date from which the authority shall not accept new examination requests. Its text does not repeal Section 171 or direct automatic termination of pending matters. This anti-profiteering jurisdiction must be distinguished from ordinary GST appellate jurisdiction; earlier NAA/CCI investigations are historical steps.

Treatment note

Checked 13 October 2026. No later case-specific stay, recall, reversal or appeal disposition was located in the bounded official-source searches. This is not certification that no proceeding or stay exists, or that the complete current docket has been checked. The Delhi High Court's 29 January 2024 Reckitt Benckiser judgment appears in further Supreme Court proceedings, including SLP(C) 12705/2024 in the 13 May 2026 cause list. Listing is not merits approval or a stay ruling, and the current complete Supreme Court docket was not verified.

Scope of source review

One final order of the GSTAT Principal Bench exercising anti-profiteering jurisdiction. DGAP reports and earlier NAA/CCI or High Court steps are history as recorded in this order unless a separate source is expressly identified. The administrative form is read with the signed reasons. Ordinary GST appeals, all State Benches and corpus-wide completeness are not covered.

Identity note

NAPA/27/PB/2025; order reference ZA070010226000043H. The caption describes Mantri Castles Private Limited as renamed M/s Castle Vista Private Limited. Printed decision date: 10 February 2026; final-page digital-signature date: 11 February 2026. The two dates are preserved without creating a second order.

Primary source

Source description: Complete 3-page official PDF, including Form GST APL-04A and the final reasoned order. Every original page read and individually viewed; source bytes preserved. A fresh official download on 13 October 2026 was byte-identical to the retained original.

Official source: [Open source document](#)

Source pages: 3

Outcome type: final

Additional source

Central Tax Notification 18/2024 dated 30 September 2024

Source document: [Open source document](#)

Pinpoint: Paragraphs 1–2, physical p. 1: statutory power and commencement on 1 October 2024.

Central Tax Notification 19/2024 dated 30 September 2024

Source document: [Open source document](#)

Pinpoint: Operative paragraph, physical p. 1: 1 April 2025 cutoff for accepting examination requests.

CGST Act 2017, India Code compilation marked as at 11 June 2026

Source document: [Open source document](#)

Pinpoint: Sections 109 and 171; relevant statutory passages reviewed, not a complete legislative-update audit.

Reckitt Benckiser India Private Limited v. Union of India, Delhi High Court, 29 January 2024

Source document: [Open source document](#)

Pinpoint: W.P.(C) 7743/2019 and connected matters; background authority. This note does not claim final Supreme Court approval.

Supreme Court cause list for 13 May 2026

Source document: [Open source document](#)

Pinpoint: Physical p. 37, Reckitt SLP(C) 12705/2024. Listing evidence only, not a merits judgment or stay order.

Disclosures and source rights

AI disclosure: Prepared with AI assistance from the identified sources. No human legal review is claimed.

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Source checked: 13 October 2026