IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

CNR No: PHHC011045392026
2026:PHHC:125477



1. CRM-M-35651 of 2026(O&M)

NAVINDER SINGH SAHDEV

..Petitioner

Versus

DIRECTORATE GENERAL OF GST INTELLIGENCE, CHANDIGARH

..Respondent

2. CRM-M-35651 of 2026(O&M)

MANISH KUMAR AGGARWAL

..Petitioner

Versus

DIRECTORATE GENERAL OF GST INTELLIGENCE, CHANDIGARH ..Respondent

Sr. No.	Particulars	
1.	The day when the judgments are reserved	03.09.2026
2.	The day when the judgments are pronounced	07.09.2026
3.	The day when the judgments are uploaded on website	07.09.2026
4.	Whether only operative part of the judgments is pronounced or full judgment is pronounced	Full
5.	The delay, if any, of the pronouncement of full judgments and reasons thereof	Not applicable

CORAM: HON'BLE MS. JUSTICE SHALINI SINGH NAGPAL

Present: Mr. Gaurav Chopra, Sr. Advocate
With Ms. Darika Sikka, Advocate
For the petitioner in CRM-M-35651-2026.

Mr. Gautam Dull, Sr. Advocate with
Ms. Radhika Mehta, Advocate,
Mr. Rehan Gupta, Advocate,

Mr. Ruchir Bhatia, Advocate,
Mr. Rishabh Pandey, Advocate,
Mr. Deepak Sharma, Advocate and
Mr. Gurjinder Singh Thind, Advocate
For the petitioner in CRM-M-35345-2026.

Mr. Naman Jain, Sr. Standing Counsel and
Mr. Udit Jain, Advocate for the respondent.

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SHALINI SINGH NAGPAL, J.

1. Both petitions under Section 483 of Bharatiya Nagarik Suraksha Sanhita, 2023 seek regular bail in case FIR No. Int/Intl/414/2026-Group D, o/o ADG, DGGI-ZU Chandigarh dated 01.05.2026 under Sections 132(1)(A) read with Section 132(5) of the CGST Act, 2017 and Section 20(XV) of the Integrated Goods and Services Tax Act, 2017, punishable under Section 132(1)(I) of the Act. Both are first petitions for regular bails.

2. The case, as set up by the Directorate General of GST Intelligence, Chandigarh is that both petitioners were involved in large scale organized and multi-layered scheme involving clandestine supply of online money-gaming services, including real-money card games such as *Teen Patti* and Rummy, through a network of sham/dummy companies, with the clear object of suppressing actual taxable receipts and evading payment of GST. The transactions were rooted through payment gateways, bank accounts and entities which were either non-genuine or created for facilitating the illegal arrangement. The taxable receipts were grossly suppressed in the GST returns, causing substantial loss of revenue to the Government. It is alleged that Manish Kumar Aggarwal was the was the CEO of M/s. Dhanik Traders (OPC) Private Limited, the Central nodal payment hub for the entire scheme, in which hundreds of crores were routed.

Narinder Singh Sahdev was the Director of M/s. Dhanik Traders (OPC) Private Limited and Proprietor of M/s Vansh Enterprises. Both of them directed their Chartered Accountants to file GST returns of all the firms declaring only commission and not the actual gaming receipts. M/s. Dhanik Traders was the Central Nodal/payout account for the entire network and its associated website was set up as a e-commerce portal, but no products were ever sold through it and the actual business was pay-in and payout for online gaming. A web of multiple companies-registered as skill-based gaming or e-commerce operators-served as pay-in entities receiving gaming deposits through payment gateway M/s. Airpay Services Pvt. Ltd. All the companies in the network were found to be non-existent or non-functional at their registered principal places of business. The directors were dummy directors and the actual management, banking operations and compliances were handled entirely by both petitioners. Evasion of GST was approximately Rs. 156 crores.

3. Learned counsel for the petitioners submit that entire case of the department was based on documents which were already seized by the investigating agency. The whatsapp chats and disclosure statements of co-accused had weak evidentiary character and could not be relied upon. Evidence sought to be led against the petitioners included digital records and there was no chance of the petitioners to tamper with the same. Relying upon ***Sanjay Chandra Vs. CBI, (2012) 1 SCC 40*** it was argued that gravity of the charge was to be determined by maximum sentence prescribed by the Statute, which was only 05 years. There was no likelihood of flight or tampering with the evidence and no necessity for detaining the petitioners

behind bars. Investigation against the petitioners was complete and further pre-trial detention of the petitioners would serve no purpose. Petitioners had always been co-operating during investigation. Both petitioners who were in custody for the last 04 months, deserved to be enlarged on regular bail.

4. Learned counsels for the respondents have opposed the prayer for regular bail submitting that petitioners meticulously planned and executed scheme of tax frauds involving deliberate suppression of supply, creation of a web of non-existent or non-functional companies, systematic under-reporting in GST returns and active concealment of true nature of transactions. Grant of bail to the petitioners would undermine the administration of tax laws. Loss of revenue to the Government was about 156 crores and substantial documentary, digital and financial documents were collected against the petitioners indicating their complicity. Both petitioners had central and primary role and considering the gravity of the offences, the pivotal role of the petitioners and the largescale tax evasion racket involving multiple sham/dummy entities, petitioners did not deserve concession of bail. In support of his submissions, he referred to ***Directorate General of Goods and Services Tax Intelligence (HQS) Vs. Gameskraft Technologies Pvt. Ltd. SCC (2026) 42 Centax 495(SC), Naresh J. Sukhawani Vs. Union of India SCC 1996 (83) ELT258SC), Surjeet Singh Chhabra Vs. Union of India SCC, 1997(1) SCC 508, P.V. Ramana Reddy Vs. Union of India 2019(26) GSTL 185, P.V. Ramana Reddy Vs. Union of India SCC 2019 (26) GSTLJ I75 (SC), Subair T.B. Vs. State of Kerala (2025) 26 Centax 158 (Ker), Rajesh Gandhi Vs. Union of India (2024) 23 Centax 319, State of Gujarat Vs. Choondamani Parmeshwaran Iyer***

(2023) 8 Centax 224 (SC), Sandeep Goyal Vs. Union of India SB Criminal Misc. III Bail Application No. 1521 of 2020, Sandeep Goyal Vs. Union of India 2020(36) GSTL 497 (SC), Basudev Mittal Vs. Union of India (2023) 2 Centax 295 (SC), Anil Kumar Vs. Union of India (2024) 22 Centax 583 (Raj.) and ***Ashutosh Garg Vs. Union of India SB Criminal Misc. Bail Application No. 548 of 2024.***

5. In ***Vineet Jain Vs. Union of India 2025(99) GSTL 129***, in a case under Section 132(1) of the Central Goods and Services Tax Act, 2017, while deciding prayer for bail, the Apex Court observed as under:

> *"We are surprised to note that in a case like this, the appellant has been denied the benefit of bail at all levels, including the High Court and ultimately, he was forced to approach this Court. These are the cases where in normal course, before the Trial Courts, the accused should get bail unless there are some extra ordinary circumstances."*

6. Identical were the observations of Hon'ble Apex Court in ***Ashutosh Garg Vs. Union of India 2024(105) GST 572*** and ***Vipin Garg @ Bindu Vs. State of Haryana 2023(69) GSTL 3***, which too related to offence punishable under Section 132(1) of the Central Goods and Services Tax Act, 2017.

7. In ***Ratnambar Kaushik Vs. Union of India 2022(10) WLC 271*** as well, the Apex Court, while considering the fact that investigation was complete and charge sheet was filed; that offence under Section 132(1) of the Central Goods and Services Tax Act, 2017 was punishable with imprisonment upto 05 years and fine; that accused had already undergone

incarceration of 04 months; that completion of trial was likely to take time, directed release of the petitioner on bail.

8. Co-ordinate Benches of this Court also, in similar circumstances in ***Jashanpal Singh Vs. Union of India 2026 PHHC 014806, Mohit Singla Vs. Directorate General of Goods and Services Tax Intelligence 2026 PHHC 018368, Manish Kumar and Others Vs. Directorate General of Goods and Services Tax Intelligence and others 2025 NCPHHC 97148, Pawan Kumar and Others Vs. State of Punjab and Others 2025 NCPHC 73945, Manoj Gupta Vs. Union of India and Others 2025 NCPHHC 84887, Sarthak Jain Vs. Senior Intelligence Officer 2025 NCPHHC 85931, Parteek Das Gupta Vs. State of Haryana and Another 2024 NCPHHC 46670, Amit Bansal Vs. State of Haryana 2024 NCPHHC 19173, CRM-M-64134-2023 titled Tejpal Singh Vs. Director General of Goods and Services Tax Intelligence and Another decided on 05.02.2024, Sunil Mahlawat Vs. Central Goods and Services Tax 2023(68) GSTL 31, Shamim Akhtar Vs. Directorate General of Goods and Services Tax Intelligence 2023 NCPHHC 66070, Arvind Kumar Vs. Directorate General of Goods and Services Tax Intelligence, Amritsar 2025 NCPHHC 65125 and Deepak Sharma Vs. State of Punjab and Another 2024 NCPHHC 104729*** have favourably considered the prayer for bail made by the accused.

9. Undisputedly, investigation against the petitioners stands concluded. Petitioners are in custody w.e.f. 01.05.2026 i.e. for the last 04 months and 02 days. The offences under Sections 132(1)(A) read with Section 132(5) of the CGST Act, 2017 and Section 20(XV) of the Integrated

Goods and Services Tax Act, 2017, for which the petitioners have been arrested, punishable with maximum imprisonment of 05 years, are triable by the Court of Magistrate. Undeniably, the evidence proposed to be led is documentary in nature and the witnesses sought to be produced are official ones. As such, the chances of petitioners influencing the witnesses or tampering with evidence are negligible. Petitioners have roots in the society. Trial is yet to commence and conclusion thereof by an early date, does not appear to be a possibility. Further detention of the petitioners would not serve any useful purpose. Therefore, without commenting on merits of the case, both petitions are allowed. Petitioners are ordered to be released on regular bail subject to their furnishing adequate bail and surety bonds to the satisfaction of trial Court/Duty Magistrate and further subject to following conditions:

1. The petitioners will not tamper with the evidence during the trial.

2. The petitioners shall surrender their passport and will not leave the country without the permission of the Trial Court.

3. The petitioners will not change their residence without prior intimation to the Department and the trial Court.

4. The petitioners will not influence the prosecution witnesses.

5. The petitioners will furnish an undertaking by way of their affidavit(s) before the trial Court that they will appear on each and every date fixed, unless their presence is exempted by a specific order of the Court.

6. The petitioners shall not commit an offence similar to the one involved in this, which they are accused of, or for commission of which they are suspected of.

7. The petitioners shall not directly or indirectly coerce, induce, threaten or promise to any person acquainted with the facts of the case so as to dissuade him/ her from disclosing such facts to the Court or to any police officer or tamper with the evidence in any manner.

8. The petitioners shall not in any manner misuse their liberty.

9. Any infraction shall entail in withdrawal of the benefit granted by this Court.

10. Learned trial Court would, however, be at liberty to impose any other condition as may be deemed fit.

11. In case, the petitioners, fail to abide by the conditions, the respondent-department may seek cancellation of their bail.

12. Pending CRM(s), if any, also stand disposed of.

13. A photocopy of this order be placed on the file of other connected case.

(SHALINI SINGH NAGPAL)
JUDGE

07.09.2026
Ajay Goswami

Whether speaking/reasoned : Yes
Whether reportable : No