



Office of the Auditor-General for the Federation
Abuja, Nigeria

REVENUE ASSURANCE AUDIT REPORT
OF THE AUDITOR-GENERAL FOR THE FEDERATION
ON
FEDERAL INLAND REVENUE SERVICE

**TAX ASSESSMENT, COLLECTION AND
REMITTANCE TO THE FEDERATION ACCOUNT**

(2018 TO 2021)

UNDER THE
FISCAL GOVERNANCE AND INSTITUTION PROGRAMME (FGI)

Revenue & Economic Sector Audit

DEPARTMENT

QUARTERS:

House,
Samuel Ademulegun Street,
Business District,
Garki-Abuja, Nigeria.

OAGF/INTAU/WB/PA/2023/08



LAGOS OFFICE:

Glass House,
Federal Ministry of Works Building,
Opposite Tafawa Balewa Square,
Lagos.

22nd January, 2024

Date

The Chairman,

Federal Inland Revenue Service,
Zone 5, Wuse
Abuja.

Management Letter:
Revenue Assurance Audit Report
For the years 2018 - 2021

Our Letter of Engagement (LoU) with reference number OAGF/INTAU/WB/PA/2023/07 dated 20th April 2023, refers.

The Office of the Auditor-General for the Federation has conducted a Revenue Assurance Audit on the Federal Inland Revenue Service for the years 2018 to 2021 in accordance with the Auditor-General for the Federation's mandate in Section 85(4) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) and according to the International Standards of Supreme Audit Institutions (ISSAI) 4000.

Audit Findings

The audit findings which were identified during the course of the audit and with responses obtained from Large Tax Office (LTO) and Medium Tax Offices (MTO) are included below.

Management Comments

It would be appreciated if your comments on these audit findings and confirmation of those responses obtained from Zones / commands during the visit could be communicated to the under-signed within fourteen (14) days from the date of receipt of this report as the report will be finalized thereafter. Please, do not hesitate to contact the email address: benjaminangbo@yahoo.com, should the need arise in this matter.

Appreciation

We express our appreciation for the conducive environment created by the management and staff of the Federal Inland Revenue Service (FIRS) during the audit exercise.

Angbo Benjamin Y., FCNA, FCTI
Director of Audit (Revenue & Economic Sector Audit Dept.)
for: Auditor-General for the Federation\

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CHAPTER ONE:

1.1 INTRODUCTION

One of the objectives of the Federal Government of Nigeria (FGN) is to improve fiscal management and accountability at the Federal level by strengthening the oversight of Federation revenue mobilization.

To achieve this objective, the FGN through the Federal Ministry of Finance (FMoF) partnered with the World Bank for support and the Office of the Auditor-General for the Federation (OAuGF) was assigned the target of conducting revenue assurance and information technology audits of major revenue generating agencies in the Federal Republic of Nigeria - two¹ (2) agencies in the first instance - namely the Nigeria Customs Service (NCS) and Federal Inland Revenue Service (FIRS). The Fiscal Governance and Institutions Programme (FGIP) through which this support is being provided includes other deliverables, namely a reconciliation of Oil and Gas revenue figures produced by various actors in the sector, in particular at NEITI. It also includes IT audits to be conducted of the Government Accounting and Financial Reporting Applications (GIFMIS) and Government Payroll systems (IPPIS). These two separate IT Audit deliverables are not however among those for which the OAuGF would be rewarded with grants for the achievement of results.

The audit revenue assurance report provides an overview of activities of the FIRS on TAX assessment, collection and remittance to the Federation account for the years 2018 to 2022

1.2 Internal Governance Arrangements

The Auditor-General for the Federation (AuGF) is a member of the Steering Committee coordinated by the International Economic Relation Department of the Federal, Ministry of Finance, Budget and National Planning in conjunction with the World Bank.

1.3 Overview of Revenue Assurance

Revenue Assurance (RA) is a means of identifying and remedying (or preventing) problems that result in under-performance in revenue collection. Our audits were geared towards improving operational efficiency and ensuring that all revenues accruing to either the Federation or the Federal Government are collected and remitted without material financial leakages. We also sought to identify risks associated with collections and accounting throughout the Revenue Mobilization process, with a view to making implementable recommendations for addressing such risks.

The main objectives of the assurance engagement are therefore as follows:

- To enhance and strengthen the oversight of revenues accruing to the Federation account by the revenue generating agencies.
- To provide assurance that adequate regulations and procedures have been formulated by the revenue generating agencies to secure an effective check on assessment, collection, and proper remittance of revenue and that such regulation and procedures are being complied with.

1.4 Reasons for the audit

The Federal Inland Revenue Service (FIRS) plays a crucial role in the revenue generation of the Federal Government of Nigeria. The Agency is responsible for TAX assessment, collection and remittance to the Federation Account.

1.5 Purpose and Scope of the Audit

The purpose of the audit was to determine whether FIRS is ensuring that adequate measures are put in place to maximise its revenue generation potential. The Audit was carried out at selected FIRS large TAX offices and Medium TAX Offices.

1.6 Audit Objective

The objective of this Revenue Assurance Audit was to assess whether the Management of FIRS has put in place adequate systems, regulations, procedures, and equipment to secure effective check on assessment, collection and proper remittance of revenue to the Federation account.

1.7 Audit Methodology

We carried out the audit by reviewing documents, TAX payers files, interviews, and observations at the selected TAX Offices.

1.8 Standard Used for the Audit

This audit was conducted in accordance with the International Standards of Supreme Audit Institutions (ISSAIs) on Performance Auditing issued by the International Organisation of Supreme Audit Institutions (INTOSAI). These standards require that the audit is planned and performed in order to obtain sufficient and appropriate evidence to provide a reasonable basis for conclusions based on audit objectives.

1.9 Audit approach

This revenue assurance audit adopts a combination of results- and system-oriented audit approach. A result-oriented audit approach assesses whether output objectives have been achieved or services are operating as designed.

A problem-oriented audit approach generally begins with a preliminary problem that may need to be further verified during the audit. Accordingly, this approach places a special emphasis on examining, verifying and analysing the causes of performance problems.

Consequently, performance and compliance auditing methods have been applied to bring an emphasis on evaluating the effectiveness, efficiency and the sustainability of action undertaken by FIRS in implementing its mandate

CHAPTER TWO

2.1 BACKGROUND

In line with the Letter of Understanding (LoU) on the subject assignment dated 20th April 2023, the audit team had its entry meeting at the FIRS Headquarter, thereafter embarked on field work to tax offices namely Large Tax Offices and Medium Tax Offices. In the course of the exercise, the audit team reviewed taxpayers' files to confirm the level of compliance on its mandate of assessment, collection, accounting and enforcement of payment of all taxes due to the Government.

Following the outcomes of the initial findings from the review, visited tax offices were availed with the observations for their responses after which inferences were drawn.

2.2 EXECUTIVE SUMMARY

The Office of the Auditor General for the Federation embarked on the audit exercise of the revenue generated by the Federal Inland Revenue Service with specific objectives to address the following revenue collection challenges and bottlenecks hampering the effectiveness of Government in promoting growth and development:

- (i) Poor oversight of revenue accruing to the Federation Account;
- (ii) Low Tax Revenue Collection;
- (iii) Poor Implementation of Tax Laws;
- (iv) Taxpayers apathy to tax compliance;
- (v) Multiple Taxation

Between 2018 and 2021, Nigeria recorded average tax-GDP ratio of about 6% which is lower than the average of the 31 African countries in Revenue Statistics (OECD 2022).

2.3 The Process/Method Adopted:

- a. **Field Audit Work** – Selected staff of the OAuGF received instruction to visit the Federal Inland Revenue Service in Port-Harcourt, Rivers State. This group visited Medium Tax Office (MTO) and Large Tax Office (LTO).
- b. **Period Covered** – The audits were to cover 2018 to 2021 years of assessments.
- c. **Location and Tax Offices** – This report focuses on selected offices of Federal Inland Revenue Service namely Medium Tax Office (MTO) and Large Tax Office (LTO) located in Lagos (Ikeja and Ikoyi), Kano, Port-Harcourt and Enugu.
- d. **Team Composition** – Staff of the OAuGF were selected based on their experience in similar project and their performance during the capacity development program.
- e. **Type of Taxes:** To review various corporate taxes collected by Federal Inland Revenue; such as Company Income Tax, Petroleum Profit tax, Value Added Tax, Withholding tax and Tertiary Education Tax and Information technology Tax.

CHAPTER THREE

3.1. General Observations / Findings:

The following observations were believed to be the factors responsible for the below par performance:

- a. Taxpayers claimed Capital Allowances without Certificate of Allowance for Fixed Assets (CAFA).
- b. Tax Audit were not regularly conducted
- c. Self-assessment done by taxpayer were not reviewed to ascertain the accuracy of the amount self-assessed.
- d. Possible understated revenue and overstated expenses by taxpayers.
- e. Penalties and interest on overdue tax liabilities were waived and reasons were not provided in the taxpayer's files.
- f. Insufficient public sensitization and low tax drive at state level

3.2 Findings obtained through Interview

Some Taxpayers and Staff of Federal Inland Revenue Service were interviewed and they anonymously provided their views. Their views criticized the administrative system and collection system of the Federal Inland Revenue. The following are some of their views:

a. Taxpayer:

- i. This group of respondents believes that the approach adopted by some tax official makes it difficult for taxpayers to know in certainty the actual tax they are required to pay.
- ii. Some are also of the opinion that tax official deliberately witch-hunt taxpayers who voluntarily complied while those are not compliant are left unattended.
- iii. Some also opined that the FIRS Taxpromax is not adequately automated to allow taxpayer to carry out some functions without the need to visit the tax office. They wish they could easily sit at the comfort of their offices and file their annual returns, apply for tax clearance certificate and pay their tax liabilities conveniently and promptly.

b. FIRS Staff

- i. TaxproMax is centrally controlled, some functions can be allowed at MTO, MSTO or LTO office. Functions such as generating Payment Reference Number (PRN) and scheduling installment payments.
- ii. Tax Audits are centralized. This can be left for the tax audit units residing in various tax offices of either LTO, MTO and MSTO within the state.

CHAPTER FOUR

4.1 Conclusion

The Tax Revenue Collection Audit has provided valuable insights into the efficiency and effectiveness of our tax collection system. This comprehensive examination of our revenue collection processes has shed light on areas of improvement, ensuring that the government can better meet its financial obligations and provide essential services to the citizens.

Throughout the audit, both strengths and weaknesses in FIRS tax collection mechanisms were identified. The dedication and professionalism of tax authorities, who diligently carry out their responsibilities were also recognized. Nevertheless, there are evident areas for enhancement, including the need for greater transparency, simplification of tax codes, and improved compliance measures.

It is crucial to recognize that the purpose of this audit is not solely to pinpoint deficiencies but also to drive positive change. The Federal Government must use the audit's recommendations as a roadmap for reforming and optimizing our tax collection procedures. By doing so, revenue collection efficiency can be increased, tax evasion reduced, and fairer and more equitable system can be created.

Ultimately, the success of this audit will be determined by the actions taken in response to its findings. The Federal Government must commit to implementing the recommended improvements and working collaboratively with stakeholders, including taxpayers, to create a tax system that is not only effective but also serves the best interests of our nation.

In summary, the Tax Revenue Collection Audit is a critical step towards enhancing our fiscal stability, achieving economic growth, and ensuring that the tax burden is distributed fairly. It is incumbent upon us to turn the insights gained from this audit into meaningful reforms that will benefit both the government and its citizens.

CHAPTER FIVE

5.1 Recommendations

To generate more revenue, the Federal Inland Revenue Service (FIRS) and the Federal Government of Nigeria can consider the following recommendations:

a. Broaden the Tax Base:

Expand the tax base by bringing more individuals and businesses into the tax net. This can be achieved through improved taxpayer registration, data sharing with other government agencies, and implementing policies that reduce tax evasion and avoidance.

b. Simplify Tax Laws:

Simplify the tax codes and regulations to make them more accessible and understandable to taxpayers. Complex tax laws can lead to non-compliance, so simplification can improve voluntary compliance.

c. Improve Taxpayer Education and Awareness:

Invest in public awareness campaigns and educational programs to inform citizens and businesses about their tax obligations and the benefits of paying taxes. Informed taxpayers are more likely to comply.

d. Enhance Tax Collection Processes:

Modernize tax collection processes and leverage technology to streamline tax administration. Implementing online payment systems, electronic filing, and data analytics can improve the efficiency of tax collection.

e. Strengthen Enforcement and Compliance Measures:

Increase efforts to combat tax evasion and fraud. This may involve conducting more audits, utilizing data analytics to detect non-compliance, and imposing penalties for tax offenders. For example, implement the CAFA provisions by ensuring that taxpayers truly own the fixed assets that they are claiming capital allowances on. The process of obtaining CAFA (Certificate of Allowance for Fixed Asset) can be automated.

f. Review Tax Incentives:

Review and possibly reduce tax incentives and waivers that are eroding the revenue base. Evaluate the effectiveness of these incentives and ensure they align with the country's economic goals.

g. Combat Corruption:

Implement anti-corruption measures to reduce leakages in the tax collection process. Transparency and accountability in the administration of tax revenues are crucial.

h. Prioritize Sector-Specific Taxation:

Identify sectors with the potential for increased revenue generation, such as the digital economy, extractive industries, and real estate, and develop targeted taxation policies for these sectors.

i. Optimize Tax Treaty Agreements:

Review and negotiate tax treaty agreements with other countries to prevent profit shifting and ensure that Nigeria receives its fair share of taxes from international businesses.

j. Improve Tax Administration and Efficiency:

Invest in the training and capacity building of tax officials to enhance their ability to collect taxes effectively and provide better customer service to taxpayers.

k. Reduce Tax Evasion in Informal Economy:

Address the issue of tax evasion and in the informal economy by offering incentives for businesses and individuals to formalize their activities and become tax-compliant. The authorities should woo the taxable persons in the informal sector with the provision of setting necessary basic amenities that will attract them to be registered as taxpayers. These amenities include, electricity, hospitals, motorable roads and schools.

l. Long-Term Planning and Diversification:

Develop a long-term fiscal plan that includes diversification of revenue sources beyond oil and gas. Investing in non-oil sectors, such as agriculture, manufacturing, and services, can provide sustainable revenue streams.

m. Public-Private Partnerships (PPPs):

Explore opportunities for PPPs to finance and manage public infrastructure and services, which can generate revenue for the government.

n. Reduce Tax Collection Costs:

Optimize operational costs within the tax collection system to ensure that a larger portion of the revenue collected goes to the government rather than administrative expenses.

o. Monitor and Evaluate:

Continuously monitor the effectiveness of revenue generation strategies and regularly evaluate tax policies and their impact on the economy.

By implementing these recommendations, the Federal Inland Revenue Service and the Federal Government of Nigeria can work towards improving revenue collection and achieving sustainable economic growth while ensuring that the tax burden is distributed fairly across the population.

SPECIFIC AUDIT ISSUES

AUDIT ISSUES WITH RESPECT TO THE REVIEW AT FIRS LARGE TAX OFFICE

AND MEDIUM TAX OFFICES

A. Large Tax Office (LTO) Non-Oil (Financial) Ikoyi

During the examination of some selected Tax Payers files at the Federal Inland Revenue Service Large Tax Office (LTO) Non-Oil (Financial) Ikoyi for the years ended December 2018, 2019, 2020 and 2021, the following Audit Issues were raised:

ISSUE 1: ABSENCE OF FINANCIAL STATEMENTS IN COMPANY'S TAX FILE

Description of Findings:

Section 55 (1) of Company Income Tax Act (CITA) states "Every company, including a company granted exemption from incorporation, shall, at least once a year without notice or demand therefrom, file a return with the Board in a prescribed form and containing prescribed information together with the following -

a) the audited accounts, tax and capital allowances computations and a true and correct statement in writing containing the amounts of its profits from each and every source computed in accordance with the provisions of this Act and any rules made thereunder;"

Audit review of some selected tax payers files revealed that:

- i. United Capital Asset Management with TIN No. 01455665-0001 audited accounts of 2017 and 2018 financial year end was not sighted in the tax payers file with the Service.
- ii. NPF Microfinance Bank Plc with TIN No. 00122558-0001 audited accounts of 2019 and 2020 financial year end was not sighted in the tax payers file with the Service.

Risks:

- i. Tax paid may not be accurate.
- ii. Failure to render returns.

Recommendations:

The Tax Controller of Non Oil and Gas (Financial) is requested to:

- i. Provide explanation for the absence of the listed company's financial statements in their respective files with the Service.
- ii. Produce the financial statements for audit scrutiny.

Management Response

1. United Capital Asset Management Ltd: The File was recently transferred to us from another tax office, we have reached out to the previous office/Taxpayer for the missing AFS.
2. *NPF Microfinance Bank Plc: The File Jacket for the relevant year has been checked and it can be confirmed that the 2019 Tax computation is in the file, the taxpayer has been contacted for the hard copy of the AFS. The 2020 AFS was filed on taxpro max platform.*

ISSUE 2: CAPITAL ALLOWANCES ENJOYED BY TAX PAYERS WITH EVIDENCE OF CERTIFICATE OF ACCEPTANCE OF FIXED ASSETS (CAFA)

Description of Findings:

Section 3 of the Industrial Inspectorate Act states “(1) As from the commencement of this Act, any person proposing-(a) to start a new undertaking involving the expenditure of not less than twenty thousand naira; or (b) to incur additional capital expenditure of not less than twenty thousand naira in respect of an existing undertaking, shall give to the Director notice of his intention in the form specified in the First Schedule to this Act.

(2) The Director shall on receipt of the notice sent pursuant to subsection (J) of this section verify the information contained therein and may-(a) demand and make use of any document relating to the purchase (whether locally or abroad) of any plant or machinery or parts thereof; (b) in the case of second-hand equipment, demand and make use of information relating to the history of the equipment; (c) carry out physical checks on the site of any undertaking and inspect any building, plant or machinery.

(3) On being satisfied with the investment valuation as determined pursuant to the provisions of sections 1, 2 and 3 to this Act, the Director shall prepare and forward to the person carrying on the undertaking a certificate of acceptance which shall be in the form specified in the First Schedule to this Act.”

Audit review of sampled tax payers at the Non Oil and Gas (Financial) Tax Office revealed that:

- i. Ten (10) sampled Tax Payers enjoyed capital allowance without evidence of a Certificate of Acceptance of Capital Assets (CAFA) in files for the financial years.
- ii. The total of N43,219,212,029.51 was capital allowance enjoyed by the ten (10) sampled tax payers as shown on Table 1 below:

Table 1: Capital allowances enjoyed by tax payers with evidence of Certificate of Acceptance of Fixed Assets (CAFA)

S/N	COMPANY	TIN NO.	YEAR	CAITAL ALLOWANCE	TOTAL
1	System Spec Ltd	00070939-0001	2018	198,415,999.58	
			2019	180,538,956.42	
			2020	311,530,545.04	
			2021	295,326,549.66	985,812,050.70
2	Citibank Ltd	00384149-0001	2018	0.00	
			2019	0.00	
			2020	1,229,136,141.00	
			2021	0.00	1,229,136,141.00
3	Stanbic IBTC Pension Managers Limited	01494134 – 0001	2018	527,904,294.00	
			2019	527,904,294.00	
			2020	379,544,501.00	
			2021	348,177,915.00	1,783,531,004.00
4	Greenwich Merchant Bank Ltd	00090444-0001	2018	33,379,222.35	
			2019	34,815,888.11	
			2020	44,357,171.94	
			2021	558,798,972.41	671,351,254.81
5	Access Bank	00792879-0001	2018	36,518,694,981.00	
			2019	0.00	
			2020	0.00	
			2021	0.00	36,518,694,981.00

6	Aiiico Insurance Plc	00401332-0001	2018	0.00	
			2019	0.00	
			2020	455,986,718.00	
			2021	0.00	455,986,718.00
7	Peninsula Microfinance Bank Limited	18297085-0001	2018	0.00	
			2019	644,672.00	
			2020	868,849.00	
			2021	622,692.00	2,136,213.00
8	NPF Microfinance Bank Plc	00122558-0001	2018	245,700,256.00	
			2019	250,736,954.00	
			2020	273,894,586.00	
			2021	247,690,107.00	1,018,021,903.00
9	Interswitch Financial Inclusion Services Ltd	18014693-0001	2018	2,371,750.00	
			2019	2,890,625.00	
			2020	2,392,175.00	
			2021	0.00	7,654,550.00
10	Zenith Pension Custodian Limited	01360453-0001	2018	271,831,775.00	
			2019	3,789,970.00	
			2020	144,805,269.00	
			2021	126,460,200.00	546,887,214.00
Total					43,219,212,029.51

Source: Tax Payers files

iii. The total capital allowance enjoyed by the sampled tax payers without evidence of CAFA resulted to a revenue loss of ₦12,965,763,608.85 (Twelve billion, nine hundred and sixty five million, seven hundred and sixty three thousand, six hundred and eight naira, eighty five kobo) as Company Income Tax. Applying 30% of the total capital allowance absorbed from the profit of the tax payers.

Risks:

- i. Revenue loss to government.
- ii. Less tax is paid by tax payer.

Recommendations:

The Tax Controller of Non-Oil and Gas (Financial) is requested to:

- i. Provide explanation for the absence of CAFA for the financial years in which the sampled taxpayers enjoyed capital allowances without CAFA.
- ii. Recover the sum of ₦12,965,763,608.85 from the affected sampled taxpayers.
- iii. Forward to the Auditor-General for the Federation the evidence of recovery for audit scrutiny and confirmations.

Management Response

1. The taxpayers usually experience delays in obtaining CAFA from the Federal Ministry of Trade and Industry, hence, it becomes difficult to disallow their claims on Capital Allowance.
2. The Service will appreciate any effort you can render in facilitating the early release of CAFA by the Federal Ministry of Trade and Industry to taxpayers.

ISSUE 3: ADDITIONAL ASSESSMENTS WITHOUT EVIDENCE OF RECOVERY - (₦66,667,638,701.25)

Description of Findings:

Section 66 of Company Income Tax Act (CITA) states “(1) If the Board discovers or is of the opinion at any time that any company liable to tax has not been assessed or has been assessed at a less amount than that which ought to have been charged, the Board may, within the year of assessment or within six years after the expiration thereof and as often as may be necessary, assess such company at such amount or additional amount, as ought to have been charged, and the provision of this Act as to notice of assessment, appeal and other proceedings shall apply to such assessment or additional assessment and to the tax charged thereunder:

Provided that where any form of fraud, wilful default or neglect has been committed by or on behalf of any company in connection with any tax imposed under this Act or under

the Company Income Tax Act 1961 the Board may at any time and as often as may be necessary, assess such company as such amount or additional amount as may be necessary for the purpose of making good any loss of tax attributable to the fraud, wilful default or neglect.

(2) For the purpose of computing under subsection (1) of this section the amount or additional amount which ought to have been charged, all relevant facts consistent with the provision to section 76 of this Act shall be taken into account even though not known when any previous assessment or additional assessment on the same company for the same year was being made or could have been made.”

Audit review of some sampled tax payers revealed that:

- i. The sum of ~~N~~66,667,638,701.25 (Sixty six billion, six hundred and sixty seven million, six hundred and thirty eight thousand, seven hundred and one naira, twenty five kobo) was liabilities established through self assessments, desk review assessment and special audit assessments of the sampled tax payers for the financial year ends of December 2018, 2019, 2020 and 2021 as shown in Appendix I.
- ii. The amount of ~~N~~52,168,654,418.43 (Fifty two billion, one hundred and sixty eight million, six hundred and fifty four thousand, four hundred and eighteen naira, forty three) is Company Income Tax (CIT) and Withholding Tax (WHT).
- iii. The amount of ~~N~~11,067,820,669.17 (Eleven billion, sixty seven million, eight hundred and twenty thousand, six hundred and sixty nine naira, seventeen kobo) is for Value Added Tax (VAT).
- iv. The amount of ~~N~~99,143,699.03 (Ninety nine million, one hundred and forty three thousand, six hundred and ninety nine naira, three kobo) is for Education Development Tax (EDT).
- v. The amount of ~~N~~13,373,261.89 (Thirteen million, three hundred and seventy three thousand, two hundred and sixty one naira, eighty nine kobo) is for National Information Technology Development Fund Levy (NITDEF).
- vi. The amount of ~~N~~29,306,763.00 (Twenty nine million, three hundred and six thousand, seven hundred and sixty three naira) is for Capital Gain Tax (CGT).

- vii. The amount of ₦3,289,339,889.73 (Three billion, two hundred and eighty nine million, three hundred thirty nine thousand, eight hundred and eighty nine naira, seventy three kobo) is for Stamp Duty Tax (SDT).

Risks:

- i. Recovery may be difficult.
- ii. Revenue loss.

Recommendations:

The Tax Controller of Non Oil and Gas (Financial) is requested to:

- i. Furnish the Auditor-General for the Federation with the status of the liabilities.
- ii. Forward evidence of the recovery made for audit scrutiny.
- iii. Provide details for any outstanding liabilities if any and efforts of recovery by the Tax Office.

Management Response

Management's response to the Issue should be documented here

B. LARGE TAX OFFICE (LTO) NON-OIL (MANUFACTURING) IKEJA

The following Audit Issues were raised:

ISSUE 1: ABSENCE OF FINANCIAL STATEMENTS IN COMPANY'S TAX FILE

Section 55 (1) of Company Income Tax Act (CITA) states "Every company, including a company granted exemption from incorporation, shall, at least once a year without notice or demand therefrom, file a return with the Board in a prescribed form and containing prescribed information together with the following -

- b) The audited accounts, tax and capital allowances computations and a true and correct statement in writing containing the amounts of its profits from each and every source computed in accordance with the provisions of this Act and any rules made thereunder;"

Audit review of some selected tax payers files revealed that Brenntag Chemicals Nigeria Limited with TIN No. 17822725-0001 audited accounts of 2020 financial year end was not in the tax payers file with the Federal Inland Revenue Service.

Risk(s):

- iii. Inaccurate tax paid.
- iv. Failure to render tax returns.

Recommendations:

The Tax Controller of Non-Oil and Gas (Manufacturing) is requested to:

- iii. Provide explanation for the absence of the listed company’s financial statements in their respective files with the Service.
- iv. Produce the financial statements for scrutiny.

Management’s Response:

Management’s response to the Issue should be documented here

ISSUE 2: CAPITAL ALLOWANCES ENJOYED BY TAX PAYERS WITHOUT EVIDENCE OF CERTIFICATE OF ACCEPTANCE OF FIXED ASSETS (CAFA)

Section 3 of the Industrial Inspectorate Act states “(1) As from the commencement of this Act, any person proposing-(a) to start a new undertaking involving the expenditure of not less than twenty thousand naira; or (b) to incur additional capital expenditure of not less than twenty thousand naira in respect of an existing undertaking, shall give to the Director notice of his intention in the form specified in the First Schedule to this Act.

(2) The Director shall on receipt of the notice sent pursuant to subsection (J) of this section verify the information contained therein and may-(a) demand and make use of any document relating to the purchase (whether locally or abroad) of any plant or machinery or parts thereof; (b) in the case of second-hand equipment, demand and make use of information relating to the history of the equipment; (c) carry out physical checks on the site of any undertaking and inspect any building, plant or machinery.

(3) On being satisfied with the investment valuation as determined pursuant to the provisions of sections 1, 2 and 3 to this Act, the Director shall prepare and forward to the

person carrying on the undertaking a certificate of acceptance which shall be in the form specified in the First Schedule to this Act.”

Audit review of sampled taxpayers at the Non-Oil and Gas (Manufacturing) Tax Office revealed that:

- i. Ten (10) sampled Tax Payers enjoyed capital allowance without evidence of a Certificate of Acceptance of Capital Assets (CAFA) in files for the financial years.
- ii. The sum of ~~N~~45,142,721,613.69 (Forty five billion, one hundred and forty two million, seven hundred and twenty one thousand, six hundred and thirteen naira, sixty nine kobo) was capital allowance enjoyed by the ten (10) sampled taxpayers as shown on Table 1 below:

Table 1: Capital allowances enjoyed by taxpayers without evidence of Certificate of Acceptance of Fixed Assets (CAFA)

S/N	COMPANY	TIN NO.	YEAR	CAITAL ALLOWANCE	TOTAL
1	African Continental GBF Trading Nigeria Ltd	19892897-0001	2018	26,419,983.00	
			2019	68,366,684.00	
			2020	150,679,220.00	
			2021	284,878,756.00	379,665,423.00
2	Aarti Steel Nig Ltd	01006392-0001	2018	686,982,493	
			2019	1,083,865,252	
			2020	6,939,781,218.89	8,710,628,964
3	Guinness Nigeria Plc	01061734-0001	2021	6,674,589,102.00	6,674,589,102.00
4	Pfizer Specialities Limited	00136595-0001	2021	395,298,924	395,298,924
5	Mega Life Sciences Nig. Ltd	00316297-0001	2018	7,861,196.00	
			2019	23,833,572.00	
			2020	37,436,614.00	
			2021	11,492,505.00	80,623,887.00
6	Dangote Industries Ltd	00398041-0001	2018	9,896,198,375.00	
			2019	171,223,950.00	
			2020	257,943,500.00	
			2021	14,499,960,632.00	24,825,326,457.00

7	Vf Global Services Nigeria Limited	01374924-0001	2018	155,550,465.76	
			2019	137,397,820.96	
			2020	196,788,048.32	489,736,335.04
8	De United Foods Limited	01058138-000	2018	446,484,022.00	
			2020	2,373,781,499.00	
			2021	717,893.00	2,820,983,414.00
9	Brenntag Chemicals Nigeria Limited	17822725-0001	2018	4,003,000.00	
			2019	7,890,265.87	
			2020	229,994,206.31	
			2021	416,649,069.58	658,536,541.76
10	Oriflame Cosmetics Nigeria Limited	14810940-0001	2018	26,967,600.00	
			2019	38,242,906.00	
			2020	22,974,768.00	
			2021	19,147,292.00	107,332,566.00
	Total				<u>45,142,721,613.69</u>

Source: Taxpayers files

- iii. The total capital allowance enjoyed by the sampled taxpayers without evidence of CAFA resulted to a revenue loss of ₦13,542,816,484.11 (Thirteen billion, five hundred and forty-two million, eight hundred and sixteen thousand, four hundred-and eighty-four-naira, eleven kobo) as Company Income Tax applying 30% of the total capital allowance absorbed from the profit of the taxpayers.

Risk(s)

- iii. Loss of government revenue.
iv. Inability to fund budget.

Recommendation(s):

The Tax Controller of Non-Oil and Gas (Manufacturing) is requested to:

- iv. Provide an explanation for the claims and deduction of Capital Allowances without CAFA.
v. Recover and remit the sum of ₦13,542,816,484.11 from the affected sampled tax payers to the relevant federation pool account.

- vi. Forward to the Auditor-General for the Federation the evidence of recovery for audit scrutiny and confirmations.

Management's Response:

Management's response to the Issue should be documented here

ISSUE 3: NON-FILING AND LATE FILING OF VAT RETURNS

Section 15 of Value Added Tax Act states “(1) A taxable person shall render to the Board, on or before the 30th day of the month following that in which the purchase or supply was made, a return of all taxable goods and services purchased or supplied by him during the preceeding month in such a manner as the Board may, from time to time, determine. (2) A person who imports taxable goods into Nigeria shall render to the Board returns on all taxable goods imported by him into Nigeria.”

Audit observed that:

- i. VAT returns must be filed with the FIRS on monthly basis, specifically on the 21st day of every month following the month of transaction.
- ii. Some sampled companies did not file VAT returns during the years under review as shown on Table 2 below:

Table 2: Non-Filing and Late Filing Of VAT Returns

S/NO	COMPANY NAME	TIN NO.	TAX TYPE	YOA	REMARKS
1	African Continental GBF Trading Nigeria Ltd (Incorporated 15th September, 2016)	1989289 7-0001	VAT	2018	Vat return for December, 2018 not seen in the file
				2019	vat return for November, 2019 not seen in the file
				2020	vat return for December, 2020 not seen in the file
				2021	vat return for only august and February, 2021 seen in the file
2	Aarti Steel Nig Ltd. Incorporated on 20/11/2003	0100639 2-0001	VAT	2018	vat returns were only seen for the months of January and oct 2018
				2019	vat returns not seen for September, 2019.

				2020	vat returns were only seen for the months of January 2020
				2021	no vat returns seen in the file.
3	Guinness Nigeria Plc Incorporated 29th April 1950	0106173 4- 0001/100 0761443	VAT	2018	2016,2017 were filed in 2018
				2019	No VAT Returns for March, April, May, June
				2020	No VAT Returns for November, December
				2021	Only August, April, March, May, Feb, Jan VAT was filed
4	Pfizer Specialities Limited (Incorporated On 1St November 1993)	0013659 5-0001	VAT	2018	Only eight vat returns filed in which the company claimed that they are exempted from vat included in line 10
				2019	Twelve vat returns file, goods and services exempted included in line 10
				2020	The company did not file vat returns for Jan-April,2021 and was informed via a letter dated 11/06/2021 Ref No. LTO/NO/00136595-001/VAT/2021/01
				2021	Returns filed on Tax Promax was presented for review. Tax Promax became effective from July 2021 but the company had returns filed from January to December 2021 on the app
5	Mega Life Sciences Nig. Ltd (Incorporated 29Th March 2005)	0031629 7-0001	VAT	2018	Vat return not seen for January, February, March, April and December, 2018
				2019	Vat return for December 2019 not seen
				2020	Vat return for September 2020 not seen
				2021	2021 vat return file not seen
6	Dangote Industries Ltd	0039804 1-0001	VAT	2020	Schedule of vat payment excludes the month of March 2020
7	Alpha Pharmacy & Stores Limited	0039756 8-001	VAT	2018	Returns filed for 12 months of the year
				2019	Returns filed for June to December 2019, late return penalty of ₦130,000 was raised and paid in the year under review.
				2020	Returns filed for 12 months of the year
				2021	Vat returns filed for Jan - Mar, no returns filed for April - December and no late return penalty was raised thereby resulting in revenue leakage
8	Promasidor Nigeria Ltd (Incorporated 20Th August, 1992)	0106316 0-0001	VAT	2018	No outstanding liability and returns for January to December, 2018 was seen
				2019	The liability was settled, but only returns for March and April 2019 seen
				2020	Vat return for April 2020 not seen

				2021	only five months vat returns were filed (January, February, March, April and October 2021)
9	Vf Global Services Nigeria Limited	0137492 4-0001	VAT	2020	The sum of ₦225,000.00 was raised but the company objected the penalty.
					Only returns for June was filed. no lrp was raised
				2021	
10	Oriflame Cosmetics Nigeria Limited	1481094 0-0001	VAT	2019	Only seven months returns filed
				2020	Returns for February was not filed
				2021	Returns for January only was filed

Risk(s):

- i. Loss of government revenue.
- ii. Inability to fund budget.

Recommendations:

The Tax Controller of Non-Oil and Gas (Manufacturing) is requested to:

- i. Provide explanations for the absence of VAT returns for the period identified.
- ii. Furnish this Office with the outstanding tax returns (VAT).
- iii. Recover and remit the late returns penalty from the affected companies; and
- iv. Forward evidence of collection and remittance of late returns penalty to this office for scrutiny.

Management's Response:

Management's response to the Issue should be documented here

**ISSUE 4: ADDITIONAL ASSESSMENTS WITHOUT EVIDENCE OF RECOVERY
(₦6,031,188,673.28)**

Section 66 of Company Income Tax Act (CITA) states "(1) If the Board discovers or is of the opinion at any time that any company liable to tax has not been assessed or has been assessed at a less amount than that which ought to have been charged, the Board may, within the year of assessment or within six years after the expiration thereof and as often as may be necessary, assess such company at such amount or additional

amount, as ought to have been charged, and the provision of this Act as to notice of assessment, appeal and other proceedings shall apply to such assessment or additional assessment and to the tax charged thereunder:

Provided that where any form of fraud, wilful default or neglect has been committed by or on behalf of any company in connection with any tax imposed under this Act or under the Company Income Tax Act 1961 the Board may at any time and as often as may be necessary, assess such company as such amount or additional amount as may be necessary for the purpose of making good any loss of tax attributable to the fraud, wilful default or neglect.

(3) For the purpose of computing under subsection (1) of this section the amount or additional amount which ought to have been charged, all relevant facts consistent with the provision to section 76 of this Act shall be taken into account even though not known when any previous assessment or additional assessment on the same company for the same year was being made or could have been made.”

Audit review of some sampled tax payers revealed that:

- i. The sum of ₦6,031,188,673.28 (Six billion, thirty one million, one hundred and eighty eight thousand, six hundred and seventy three naira, twenty eight kobo) was liabilities established through self assessments, desk review assessment and special audit assessments of the sampled tax payers for the financial year ends of December 2018, 2019, 2020 and 2021 as shown in Table 4 below:

Table 4: Sampled companies with raised additional tax liabilities.

S/N	COMPANY NAME	TIN NO.	TAX TYPE	YO A	ADDITIONAL TAX LIABILITY
1	African Continental GBF Trading Nigeria Ltd (Incorporated 15th September, 2016)	19892897-0001	CIT	2018	153,835,765.00
				2020	8,939,617.00
	Aarti Steel Nig Ltd. Incorporated on 20/11/2003		VAT	2018	478,462,760.00
				CIT	2019
			2020		11,726,549.00
			VAT		2018
				2019	400,248,038.00
			EDT	2020	20,007,900.00
				2018	5,008,039.00
				2019	7,684,749.20
			NITDEF	2020	2,759,653.00
2020	11,377,961.00				
3	Guinness Nigeria Plc Incorporated	01061734-	CIT	2019	12,836,825.00

	29th April 1950	0001/1000761443			
4	Pfizer Specialities Limited (Incorporated On 1St November, 1993)	00136595-0001	CIT	2018	84,046,289.00
				2019	673,854.00
				2020	20,000,000.00
				2021	9,221,061.90
			VAT	2018	17,482.00
			EDT	2018	141,558.00
5	Mega Life Sciences Nig. Ltd (Incorporated 29Th March, 2005)	00316297-0001	CIT	2018	75,058,547.00
			EDT	2020	31,673,964.69
6	Dangote Industries Ltd	00398041-0001	CIT	2019	166,691,117.00
				2020	4,041,813,049.00
			VAT	2020	16,940,241.00
			EDT	2018	7,580.00
				2019	11,112,741.00
				2021	15,547,972.00
			NITDEF	2019	23,784,311.00
				2020	1,860,001.00
2021	1,111,622.00				
7	Alpha Pharmacy & Stores Limited	00397568-001	CIT	2018	1,653,410.00
				2019	23,163,519.00
				2020	1,544,234.00
			VAT	2019	130,000.00
8	Promasidor Nigeria Ltd (Incorporated 20Th August, 1992)	01063160-0001	CIT	2018	17,565,191.00
			VAT	2019	32,337,011.00
			EDT	2018	2,360,220.00
9	Vf Global Services Nigeria Limited	01374924-0001	CIT	2020	2,745,248.71
10	De United Foods Industries Limited Incorporated 16th Sept 1993.	01058138-000	CIT	2018	16,325,374.44
				2020	156,956,133.00
			VAT	2018	1,321,880.37
				EDT	2018
				2019	4,335,657.98
11	Brenntag Chemicals Nigeria Limited; Incorporated In April 2014	17822725-0001	CIT	2018	3,006,600.00
				2019	2,072,200.00
			VAT	2018	26,325,544.70
				2019	105,529,517.23
			EDT	2018	200,440.00
				2019	471,480.00
			Total		6,031,188,673.28

Source: Tax Payers files

- ii. The amount of ₦4,821,822,878.05 (Four billion, eight hundred and twenty one million, eight hundred and twenty two thousand, eight hundred and seventy eight naira, five kobo) is Company Income Tax (CIT) and Withholding Tax (WHT).
- iii. The amount of ₦1,088,110,047.30 (One billion, eighty eight million, one hundred and ten thousand, forty seven naira, seventeen kobo) is for Value Added Tax (VAT).

- iv. The amount of ~~₦~~83,121,852.93 (Eighty three million, one hundred and twenty one thousand, eight hundred and fifty two naira, ninety three kobo) is for Education Development Tax (EDT).
- v. The amount of ~~₦~~38,133,895.00 (Thirty eight million, one hundred and thirty three thousand, eight hundred and ninety five naira) is for National Information Technology Development Fund Levy (NITDEF).

Risk(s):

- i. Loss of government revenue.
- ii. Inability to fund budget.

Recommendations

The Tax Controller of Non-Oil and Gas (Manufacturing) is requested to:

- i. Furnish the Auditor-General for the Federation with the status of the additional liabilities amounting to ~~₦~~6,031,188,673.28
- ii. Recover and remit to the relevant pool accounts the sum of ~~₦~~6,031,188,673.28; and
- iii. Forward evidence of the recovery for audit scrutiny.

Management's Response:

Management's response to the Issue should be documented here

KANO LARGE TAX OFFICE & KANO MEDIUM TAX OFFICE

A LTO REPORT FOR KANO.

ISSUE 1: NON COMPLIANCE WITH THE CONDITIONS FOR GRANTING CAPITAL ALLOWANCES ₦2,465,364,398.51

The second schedule of FIRS Act 2007 provides conditions under which a company is qualified to claim capital allowances. Such conditions include:

- i. Tax payer making such claim must own the fixed assets, and
- ii. The fixed asset must be used for the purpose of a trade or business and must be in use at the end of the period for which the tax is being computed.

The Industrial Inspectorate Act (CAP 18 LFN 2007) empowers the Industrial Inspectorate Division in the Federal Ministry of Industries to certify the actual capital investment / expenditure on fixed assets incurred by tax payers. Certificate of Acceptance on Fixed Assets (CAFA) issued by the Directorate on all qualifying assets

valued N500,000.00 (Five Hundred Thousand Naira) and above forms the basis of granting capital allowances.

Observations:

In 45 taxpayers files reviewed out of 114 active files managed by the Office, 32 do not have-

- i. Documentary evidence of purchase of fixed assets in which capital allowances amounting was claimed.
- ii. Certificate of Acceptance on Fixed Assets (CAFA) obtained from the Industrial Inspectorate Division (IID) of the Ministry of Industry could not be sighted.

Recommendations:

- i. It would be expedient if the Federal Inland Revenue Service and Industrial Inspectorate Division of the federal Ministry of Industry can adopt a more congruent approach to verify assets acquired by companies in order to ease concerns of taxpayers.
- ii. Automation of the process of registration of qualifying fixed assets by companies immediately such expenditure / investment is made to enable the IID to verify the assets within a short time and issue certificate of acceptance (CAFA).
- iii. The subsisting Act to be repealed to make Certificate of Acceptance on Fixed Assets (CAFA) compulsory for taxpayer to claim capital allowances.

Management's Response:

- i. The service has de-emphasized submission of hard copy document since 2021. The Taxpromax allows the taxpayers to file and upload theirs audited statements and tax computations online.*
- ii. Qualifying Assets would be confirmed during the tax audit as self assessment regime clearly stated the documents the taxpayers should submit while filing returns.*

**ISSUE 2. NON UTILIZATION OF SOURCE DATA FROM BANKS TO ESTABLISH
TURNOVER OF COMPANIES**

Section 28 of FIRS Act 2007 states “Without prejudice to Section 26 of this Act, every bank shall prepare upon demand by the Service, quarterly returns specifying

- a. In the case of an individual, all transactions involving the sum of N5,000,000 and above.

- b. In the case of a body corporate, all transactions involving the sum of N10,000,000 and above, the names and addresses of all customers of the bank connected with the transaction and deliver the returns to the Service.
- c. The names and addresses of new customers of the bank and shall not later than the seventh day of the succeeding month deliver the returns to the Service.”

The above section empowers the Service to demand for any banking transaction records of tax payers including those not in tax net. Such reports from Financial Institutions (banks) will help to validate the self assessed returns filed by the taxpayers.

Observations:

We observed from the tax office that such reports from banks are not available. Further review of the tax audit reports showed that such **data mining** documents are not relied upon during the tax audit, as they are not available. Tax auditors rely on documents provided by the tax payer.

Recommendations:

- i. The Service should deploy its **data mining tools** in order to track all banking transactions of taxpayers, including those not in tax net. This will not just increase the revenue of government, but will propel taxpayers to make correct declaration of company’s activities in her self assessment returns.
- ii. Tax audit should rely on such data from banks in other to validate the returns from tax payers based on self assessment.

Management’s Response:

Management’s response to the Issue should be documented here

ISSUE 3. NON REGULAR TAX AUDIT OF TAXPAYERS

The sample review of the taxpayers files revealed that some taxpayers under the office have not been tax-audited for the four years (2018-2021) as at the review period (August 2023). Out of the 66 files reviewed, 35 taxpayers were not tax-audited for the periods under review. These 35 companies claimed ~~N~~956,739,971.29 as capital allowances without Certificate of Acceptance of Fixed Assets (CAFA). The sum of

₦709,681,122.92 is the outstanding tax liabilities to be settled by these 35 companies.
See Appendix A

Recommendation:

Explanation should be provided on the onbservation raised above

Management's Response:

Management's response to the Issue should be documented here

B MTO REPORT FOR KANO.

ISSUE 1 NON COMPLIANCE WITH THE CONDITIONS FOR GRANTING CAPITAL ALLOWANCES ₦2,819,258,035.51

The second schedule of FIRS Act 2007 provides conditions under which a company is qualified to claim capital allowances. Such conditions include:

- i. Tax payer making such claim must own the fixed assets, and
- ii. The fixed asset must be used for the purpose of a trade or business and must be in use at the end of the period for which the tax is being computed.

The Industrial Inspectorate Act (CAP 18 LFN 2007) empowers the Industrial Inspectorate Division in the Federal Ministry of Industries to certify the actual capital investment / expenditure on fixed assets incurred by tax payers. Certificate of Acceptance on Fixed Assets (CAFA) issued by the Directorate on all qualifying assets valued N500,000.00 (Five Hundred Thousand Naira) and above forms the basis of granting capital allowances.

Observations:

In 78 taxpayers files reviewed out of 240 active files managed by the Office, 48 do not have-

- i. Documentary evidence of purchase of fixed assets in which capital allowances was claimed.
- ii. Certificate of Acceptance on Fixed Assets (CAFA) obtained from the Industrial Inspectorate Division (IID) of the Ministry of Industry.

Recommendations:

- i. It would be expedient if the Federal Inland Revenue Service and Industrial Inspectorate Division of the federal Ministry of Industry can adopt a more congruent approach to verify assets acquired by companies in order to ease concerns of taxpayers.
- ii. Automation of the process of registration of qualifying fixed assets by companies immediately such expenditure / investment is made to enable the IID to verify the assets within a short time and issue certificate of acceptance (CAFA).
- iii. The subsisting Act to be repealed to make Certificate of Acceptance on Fixed Assets (CAFA) compulsory for taxpayer to claim capital allowances.

Management's Response:

1. The service has de-emphasized submission of hard copy document since 2021. The Taxpromax allows the taxpayers to file and upload their audited statements and tax computations online.
2. Qualifying Assets would be confirmed during the tax audit as self assessment regime clearly stated the documents the taxpayers should submit while filing returns.

ISSUE 2: NON UTILIZATION OF SOURCE DATA FROM BANKS TO ESTABLISH TURNOVER OF COMPANIES

Section 28 of FIRS Act 2007 states “Without prejudice to Section 26 of this Act, every bank shall prepare upon demand by the Service, quarterly returns specifying

- a. In the case of an individual, all transactions involving the sum of N5,000,000 and above.
- b. In the case of a body corporate, all transactions involving the sum of N10,000,000 and above, the names and addresses of all customers of the bank connected with the transaction and deliver the returns to the Service.
- c. The names and addresses of new customers of the bank and shall not later than the seventh day of the succeeding month deliver the returns to the Service.”

The above section empowers the Service to demand for any banking transaction records of taxpayers including those not in tax net. Such reports from Financial Institutions (banks) will help to validate the self assessed returns filed by the taxpayers.

Observations:

We observed from the tax office that such reports from banks are not available. Further review of the tax audit reports showed that such data mining documents are not relied upon during the tax audit, as they are not available. Tax auditors rely on documents provided by the tax payer.

Recommendations:

- i. The Service should deploy its data mining tools in order to track all banking transactions of taxpayers, including those not in tax net. This will not just increase the revenue of government, but will propel taxpayers to make correct declaration of company’s activities in her self assessment returns.
- ii. Tax audit should rely on such data from banks in other to validate the returns from tax payers based on self assessment.

Management’s Response:

Management’s response to the Issue should be documented here

ISSUE 3: NON REGULAR TAX AUDIT OF TAXPAYERS

The sample review of the taxpayers files revealed that some taxpayers under the office have not been tax-audited for the four years (2018-2021) as at the review period (August 2023). Out of the 78 files reviewed, 56 taxpayers were not tax-audited for the periods under review. These 56 companies claimed ₦9,291,341,181.94 as capital allowances without Certificate of Acceptance of Fixed Assets (CAFA). The sum of ₦2,549,330,815.66 is the outstanding tax liabilities to be settled by these 56 companies.

Recommendation

Regular tax audit should be carried out

Management’s Response:

Management’s response to the Issue should be documented here

ENUGU MTO AND LTO REPORT:

A. ENUGU MTO -

REVIEW OF TAX FILES

During the review of the sampled tax files, the following observations and recommendations stated in column H and I respectively in the table below are forwarded for your necessary attention. Kindly provide your responses accordingly.

GENERAL OBSERVATIONS – ENUGU MTO

A	B	C	D	E	F	G	H	I	J	K
S/N	COMPANY NAME	TIN NO	TAX TYPE	YOA	CAPITAL ALLOWANCE AMOUNT (N)	OUTCOME OF DESK REVIEW/TAX AUDIT/ INVESTIGATION/VAT MONITORING	ADDITIONAL TAX LIABILITY (IF ANY)	AUDIT OBSERVATIONS	AUDIT RECOMMENDATION	FIRS RESPONSE
1	TUMMY-TUMMY FOOD INDUSTRIES LIMITED	04799 187-0001	CIT	2018	38,188,232.00	DESK REVIEW WAS CONDUCTED	17,184,131.60	<p>The additional assessment of N5,727,662.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N38,188,232.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N11,456,469.60 (i.e. CIT of 30% on N38,188,232.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N17,184,131.60 (i.e. N5,727,662.00 plus</p>	The Company should be made to pay additional tax liability of N17,184,131.60 (i.e. N5,727,662.00 plus N11,456,469.60) on the excess of relief claimed.	

					N11,456,469.60) on the excess of relief claimed.		
		2019	29,580,658.00	NO DESK REVIEW WAS CONDUCTED	8,874,197.40	The Capital Allowance of N29,580,658.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N8,874,197.40 (i.e. CIT of 30% on N29,580,658.00) additional Tax liability.	The Company should be made to pay additional tax liability of N8,874,197.40 as a result of claims on Capital Allowance without evidence of CAFA.
		2020	NIL	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	NL	There should be Tax Investigation to be conducted on the Company for the period under review.
		2021	NIL	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	NL	There should be Tax Investigation to be conducted on the Company for the period under review.
	VAT	2018	N/A	VAT MONITORING EXERCISE WAS CONDUCTED	9,003,408.37	The additional assessment of N9,003,408.37 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2018 Assessment year via Assessment No: FIRS/SE/NNE/RPPU/04799187-0001/2018/05 dated 20 th August, 2018, were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N9,003,408.37 for the 2018 Assessment year.
		2019	N/A	VAT MONITORING EXERCISE WAS CONDUCTED	7,008,218.03	The additional assessment of N7,008,218.03 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2019 Assessment year via	The Company should be made to pay additional VAT liability of N7,008,218.03 for the 2019 Assessment year.

						Assessment No: FIRS/SE/NNE/RPPU/04799187-0001/2019/15 dated 23 rd August, 2019, were yet to be paid by the company.		
		2020	NIL	VAT MONITORING EXERCISE WAS CONDUCTED	2,719,000.21	The additional assessment of N2,719,000.21 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2020 Assessment year via Assessment No: MTO/VAT/00134630-0001/2019/09/44 dated 23 rd September, 2020, were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N2,719,000.21 for the 2020 Assessment year.	
		2021	NIL	NO VAT MONITORING EXERCISE	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
	EDT	2018	NIL	TAX AUDIT WAS CARRIED OUT	2,348,537.00	The additional assessment of N2,348,537.00 raised on the Company by the FIRS as per Tax Audit carried out on Education Tax due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/AD/125, dated 21 st December, 2020, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The company should be made to pay the additional assessment of N2,348,537.00 raised on the Company by the FIRS as per Tax Audit carried out on Education Tax due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/AD/125, dated 21 st December, 2020	
		2019	NIL	TAX AUDIT WAS CARRIED OUT	6,095,501.00	The additional assessment of N6,095,501.00 raised on the Company by the FIRS as per Tax Audit carried out on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/AD/126,	The company should be made to pay the additional assessment of N6,095,501.00 raised on the Company by the FIRS as per Tax Audit carried out on Education Tax due for the	

						dated 21 st December, 2020, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/AD/126, dated 21 st December, 2020	
		2020	NIL	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	NL	There should be Tax Investigation to be conducted on the Company for the period under review.	
		2021	NIL	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	NL	There should be Tax Investigation to be conducted on the Company for the period under review.	
	WHT	2020	N/A	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	NL	There should be Tax Investigation to be conducted on the Company for the period under review.	
		2021	N/A	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	NL	There should be Tax Investigation to be conducted on the Company for the period under review.	
		2018	54,662,459.00	TAX AUDIT WAS CARRIED OUT	21,507,737.70	The additional assessment of N5,109,000.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company. The Capital Allowance of N54,662,459.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of	The Company should be made to pay additional tax liability of N21,507,737.70 (i.e. N5,109,000.00 plus N16,398,737.70) on the excess of relief claimed.	

					<p>Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N16,398,737.70 (i.e. CIT of 30% on N54,662,459.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N21,507,737.70 (i.e. N5,109,000.00 plus N16,398,737.70) on the excess of relief claimed.</p>	
	2019	86,398,839.00	TAX AUDIT WAS CARRIED OUT	40,480,730.70	<p>The additional assessment of N14,561,079.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16th August, 2022, were yet to be paid by the company.</p> <p>The Capital Allowance of N86,398,839.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N25,919,651.70 (i.e. CIT of 30% on N86,398,839.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability</p>	<p>The Company should be made to pay additional tax liability of N40,480,730.70 (i.e. N14,561,079.00 plus N25,919,651.70) on the excess of relief claimed.</p>

								of N40,480,730.70 (i.e. N14,561,079.00 plus N25,919,651.70) on the excess of relief claimed.		
2	PAACHE CONSTRUC TION LIMITED	02715 106- 0001	CIT	2020	17,316,360.00	TAX AUDIT WAS CARRIED OUT	19,367,117.00	<p>The additional assessment of N14,172,209.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16th August, 2022, were yet to be paid by the company.</p> <p>The Capital Allowance of N17,316,360.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N5,194,908.00 (i.e. CIT of 30% on N17,316,360.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N19,367,117.00 (i.e. N14,172,209.00 plus N5,194,908.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N19,367,117.00 (i.e. N14,172,209.00 plus N5,194,908.00) on the excess of relief claimed.	

			2021	14,687,463.00	TAX AUDIT WAS CARRIED OUT	29,130,912.90	<p>The additional assessment of N24,724,674.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16th August, 2022, were yet to be paid by the company.</p> <p>The Capital Allowance of N14,687,463.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N4,406,238.90 (i.e. CIT of 30% on N14,687,463.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N29,130,912.90 (i.e. N24,724,674.00 plusN4,406,238.90) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N29,130,912.90 (i.e. N24,724,674.00 plusN4,406,238.90) on the excess of relief claimed.	
			2018	N/A	TAX AUDIT WAS CARRIED OUT	2,244,688.00	<p>The additional assessment of N2,244,688.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16th August, 2022, were yet to be paid by the company.</p>	The Company should be made to pay additional tax liability of N2,244,688.00 on the excess of relief claimed.	

		2019	N/A	TAX AUDIT WAS CARRIED OUT	7,416,857.00	The additional assessment of N7,416,857.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N7,416,857.00 on the excess of relief claimed.	
	VAT	2020	N/A	TAX AUDIT WAS CARRIED OUT	5,446,969.00	The additional assessment of N5,446,969.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N5,446,969.00 on the excess of relief claimed.	
		2018	NIL	TAX AUDIT WAS CARRIED OUT	1,021,965.00	The additional assessment of N1,021,965.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,021,965.00 on the excess of relief claimed.	
		2019	NIL	TAX AUDIT WAS CARRIED OUT	1,701,955.00	The additional assessment of N1,701,955.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,701,955.00 on the excess of relief claimed.	
	EDT	2020	NIL	TAX AUDIT WAS CARRIED OUT	706,117.00	The additional assessment of N706,117.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020	The Company should be made to pay additional tax liability of N706,117.00 on the excess of relief claimed.	

					via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	
	2021	NIL	TAX AUDIT WAS CARRIED OUT	1,035,501.00	The additional assessment of N1,035,501.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,035,501.00 on the excess of relief claimed.
	2018	N/A	TAX AUDIT WAS CARRIED OUT	7,153,050.00	The additional assessment of N7,153,050.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2020 via Letter of Intent dated 16 th August, 2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N7,153,050.00 on the excess of relief claimed.
	2018	27,053,330.00	TAX AUDIT WAS CARRIED OUT	11,492,286.00	<p>The additional assessment of N3,376,287.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 6th March, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N27,053,330.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will</p>	The Company should be made to pay additional tax liability of N11,492,286.00 (i.e. N3,376,287.00 plus N8,115,999.00) on the excess of relief claimed.

						amount to N8,115,999.00 (i.e. CIT of 30% on N27,053,330.00) additional Tax liability. In total, the Company should be made to pay additional tax liability of N11,492,286.00 (i.e. N3,376,287.00 plus N8,115,999.00) on the excess of relief claimed.	
WHT	2019	72,919,816.00	TAX AUDIT WAS CARRIED OUT	23,130,468.80	<p>The additional assessment of N1,254,524.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 6th March, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N72,919,816.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N21,875,944.80 (i.e. CIT of 30% on N72,919,816.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N23,130,468.80 (i.e. N1,254,524.00 plus N21,875,944.80) on the excess of</p>	<p>The Company should be made to pay additional tax liability of N23,130,468.80 (i.e. N1,254,524.00 plus N21,875,944.80) on the excess of relief claimed.</p>	

								relief claimed.		
3	PRIVATE ESTATES INTERNATI ONAL WEST AFRICA LIMITED	11081 883- 0001	CIT	2018	NIL	TAX AUDIT WAS CARRIED OUT	171,788.00	The additional assessment of N171,788.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 6 th March, 2021 were yet to be paid by the company.	The Company should be made to pay additional tax liability of N171,788.00 on the excess of relief claimed.	
				2019	NIL	TAX AUDIT WAS CARRIED OUT	271,055.00	The additional assessment of N271,055.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 6 th March, 2021 were yet to be paid by the company.	The Company should be made to pay additional tax liability of N271,055.00 on the excess of relief claimed.	
			EDT	2018	N/A	TAX AUDIT WAS CARRIED OUT	737,123.00	The additional assessment of N737,123.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 6 th March, 2021 were yet to be paid by the company.	The Company should be made to pay additional tax liability of N737,123.00 on the excess of relief claimed.	
				2019	N/A	TAX AUDIT WAS CARRIED OUT	4,083,727.00	The additional assessment of N4,083,727.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 6 th March, 2021 were yet to be paid	The Company should be made to pay additional tax liability of N4,083,727.00 on the excess of relief claimed.	

								by the company.		
			WHT	2018	NIL	TAX AUDIT WAS CARRIED OUT	NIL	NIL	NIL	
				2018	N/A	TAX AUDIT WAS CARRIED OUT	7,422,184.00	The additional assessment of N7,422,184.00 was raised against the Company by the FIRS on VAT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N7,422,184.00 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021.	
4	IBETO PETROCHEMICAL INDUSTRIES LTD	01286251-0001	CIT	2019	N/A	TAX AUDIT WAS CARRIED OUT	13,954,322.00	The additional assessment of N13,954,322.00 was raised against the Company by the FIRS on VAT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N13,954,322.00 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021.	
			VAT	2018	NIL	TAX AUDIT WAS CARRIED OUT	2,510,121.00	The additional assessment of N2,510,121.00 was raised against the Company by the FIRS on EDT	The Company should be made to pay the additional tax liability of	

						as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021, were yet to be paid by the company.	N2,510,121.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021.
		2019	NIL	TAX AUDIT WAS CARRIED OUT	1,293,304.00	The additional assessment of N1,293,304.00 was raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of NN1,293,304.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021.
	EDT	2020	NIL	TAX AUDIT WAS CARRIED OUT	2,030,814.00	The additional assessment of N2,030,814.00 was raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N2,030,814.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on 2015 – 2019 Accounts via a Letter of Intent with Reference No: MTA/ENU/AUD/01286251-0001/03, dated 26 th July, 2021.

				2019	NIL	TAX AUDIT WAS CARRIED OUT	75,226,296.03	The additional assessment of N75,226,296.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2017-2018 Assessment years via a letter with Reference No. MTO/ENU/15085375-0001/2021/01, dated 22th April, 2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N75,226,296.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2017-2018 Assessment years via a letter with Reference No. MTO/ENU/15085375-0001/2021/01, dated 22th April, 2021 on the excess of relief claimed.	
5	ROCK-WATERS INTEGRATED SERVICES NIG LTD	15085 375-0001	CIT	2020	42,479,340.00	TAX AUDIT WAS CARRIED OUT	12,743,802.00	The Capital Allowance of N42,479,340.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N12,743,802.00 (i.e. CIT of 30% on N42,479,340.00) additional Tax liability.	The Company should be made to pay additional tax liability of N12,743,802.00 on the excess of relief claimed.	
				2021	74,761,738.00	TAX AUDIT WAS CARRIED OUT	22,428,521.40	The Capital Allowance of N74,761,738.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N22,428,521.40 (i.e. CIT of 30% on N74,761,738.00)	The Company should be made to pay additional tax liability of N22,428,521.40 on the excess of relief claimed.	

					additional Tax liability.				
			2021	N/A	TAX AUDIT WAS CARRIED OUT	124,189,205.00	The additional assessment of N124,189,205.00 (VAT Payable – N96,271,050; Interest @ 19% - N18,291,449.50; & Penalty @ 10% - N9,627,105) was raised against the Company by the FIRS on Non-filing of monthly VAT Returns for 2019, 2020 and January 2021 to April 2021 Monthly VAT Returns/VAT Administrative Assessment (2020) via a Letter from MTO Enugu with Reference No: MTA/ENU/VAT/15085374-0001/1/2021, dated 4 th June, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N124,189,205.00 raised against the Company by the FIRS on VAT as a result of Non-filing of monthly VAT Returns for 2019, 2020 and January 2021 to April 2021 Monthly VAT Returns/VAT Administrative Assessment (2020).	
			2018	53,108,470.00	TAX AUDIT WAS CARRIED OUT	22,610,576.00	The additional assessment of N6,678,035.00 (2017 YOA – N3,561,748 & 2018 YOA – N3,116,287) raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021, were yet to be paid by the company. The Capital Allowance of N53,108,470.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of	The Company should be made to pay additional tax liability of N22,610,576.00 on the excess of relief claimed.	

						<p>Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N15,932,541.00 (i.e. CIT of 30% on N53,108,470.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N22,610,576.00 (i.e. N6,678,035.00 plus N15,932,541.00) on the excess of relief claimed.</p>	
VAT	2019	45,838,347.00	TAX AUDIT WAS CARRIED OUT	15,233,730.10	<p>The additional assessment of N1,482,226.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4th November, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N45,838,347.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N13,751,504.10 (i.e. CIT of 30% on N45,838,347.00) additional Tax liability.</p>	<p>The Company should be made to pay additional tax liability of N15,233,730.10 on the excess of relief claimed.</p>	

					In total, the Company should be made to pay additional tax liability of N15,233,730.10 (i.e. N1,482,226.00 plus N13,751,504.10) on the excess of relief claimed.	
	2020	36,333,960.00	TAX AUDIT WAS CARRIED OUT	13,736,668.00	<p>The additional assessment of N2,836,480.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4th November, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N36,333,960.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N10,900,188.00 (i.e. CIT of 30% on N36,333,960.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N13,736,668.00 (i.e. N2,836,480.00 plus N10,900,188.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N13,736,668.00 on the excess of relief claimed.

				2018	NIL	TAX AUDIT WAS CARRIED OUT	604,858.00	The additional assessment of N604,858.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N604,858.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021.	
				2019	NIL	TAX AUDIT WAS CARRIED OUT	690,081.00	The additional assessment of N690,081.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N690,081.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021.	

6	DANIELS CONSTRUC TION COMPAY LTD	00407 823- 0001	CIT	2020	NIL	TAX AUDIT WAS CARRIED OUT	764,520.00	The additional assessment of N764,520.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N764,520.00 raised against the Company by the FIRS on EDT as a result of Tax Audit conducted on years of accounts of 2016 – 2019 via Letter of Intent with Reference No. FIRS/MTA/TA/EN/00407823-0001/03, dated 4 th November, 2021.
				2020	N/A	TAX AUDIT WAS CARRIED OUT	5,902,056.90	The additional assessment of N5,902,056.00 raised against the Company by the FIRS on WHT as a result of Desk Review conducted on 2019 year of account via Letter of Intent with Reference No. MTO/EN/RPP/02116025-0001/2020/07, dated 20 th November, 2020, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N5,902,056.00 raised against the Company by the FIRS on WHT as a result of Desk Review conducted on 2019 year of account via Letter of Intent with Reference No. MTO/EN/RPP/02116025-0001/2020/07, dated 20 th November, 2020.
				2018	2,153,188.00	TAX INVESTIGATION WAS CARRIED OUT	8,513,786.40	The additional assessment of N7,867,830.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/05, dated 6 th	The Company should be made to pay the additional tax liability of N8,513,786.40 raised against the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No.

						<p>May, 2022, on CIT for the 2018 YOA were yet to be paid by the company.</p> <p>The Capital Allowance of N2,153,188.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N645,956.40 (i.e. CIT of 30% on N2,153,188.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N8,513,786.40 (i.e. N7,867,830.00 plus N645,956.40) on the excess of relief claimed.</p>	<p>FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/05, dated 6th May, 2022, on CIT for the 2018 YOA.</p>
EDT	2019	1,207,063.00	TAX INVESTIGATION WAS CARRIED OUT	6,893,836.90	<p>The additional assessment of N6,531,718.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/04, dated 6th May, 2022, on CIT for the 2019 YOA were yet to be paid by the company.</p>	<p>The Company should be made to pay the additional tax liability of N6,893,836.90 raised against the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/04,</p>	

					<p>The Capital Allowance of N1,207,063.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N362,118.90 (i.e. CIT of 30% on N1,207,063.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N6,893,836.90 (i.e. N6,531,718.00 plus N362,118.90) on the excess of relief claimed.</p>	<p>dated 6th May, 2022, on CIT for the 2019 YOA.</p>
	2020	6,840,608.00	TAX INVESTIGATION WAS CARRIED OUT	6,243,863.40	<p>The additional assessment of N4,191,681.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/03, dated 6th May, 2022, on CIT for the 2020 YOA were yet to be paid by the company.</p> <p>The Capital Allowance of N6,840,608.00 claimed by the Company in 2020 YOA was without evidence of Certificate of</p>	<p>The Company should be made to pay the additional tax liability of N6,243,863.40 raised against the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/03, dated 6th May, 2022, on CIT for the 2020 YOA.</p>

					<p>Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N2,052,182.40 (i.e. CIT of 30% on N6,840,608.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N6,243,863.40 (i.e. N4,191,681.00 plus N2,052,182.40) on the excess of relief claimed.</p>	
2021	2,677,488.00	TAX INVESTIGATION WAS CARRIED OUT	5,972,347.40	<p>The additional assessment of N5,169,101.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/02, dated 6th May, 2022, on CIT for the 2021 YOA were yet to be paid by the company.</p> <p>The Capital Allowance of N2,677,488.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of</p>	<p>The Company should be made to pay the additional tax liability of N5,972,347.40 raised against the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/CIT/03, dated 6th May, 2022, on CIT for the 2021 YOA.</p>	

						<p>Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N803,246.40 (i.e. CIT of 30% on N2,677,488.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N5,972,347.40 (i.e. N5,169,101.00 plus N803,246.40) on the excess of relief claimed.</p>	
	WHT	2018	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,960,800.00	<p>The additional assessment of N1,960,800.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/04, dated 19th April, 2022, on VAT for the 2018 YOA were yet to be paid by the company.</p>	<p>The Company should be made to pay the additional tax liability of N1,960,800.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/04, dated 19th April, 2022, on VAT for the 2018 YOA.</p>
		2019	N/A	TAX INVESTIGATION WAS CARRIED OUT	5,402,105.00	<p>The additional assessment of N5,402,105.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19th April,</p>	<p>The Company should be made to pay the additional tax liability of N5,402,105.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent</p>

							2022 and Assessment No. ENU/MSTO/INV/VAT/03, dated 19 th April, 2022, on VAT for the 2019 YOA were yet to be paid by the company.	with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/03, dated 19 th April, 2022, on VAT for the 2019 YOA.	
			2020	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,999,863.00	The additional assessment of N1,999,863.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/02, dated 19 th April, 2022, on VAT for the 2020 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N1,999,863.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/02, dated 19 th April, 2022, on VAT for the 2020 YOA.	

7	FINE BROTHERS LIMITED	02153 123-0001	CIT	2021	N/A	TAX INVESTIGATION WAS CARRIED OUT	19,764,230.00	The additional assessment of N19,764,230.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/01, dated 19 th April, 2022, on VAT for the 2021 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N19,764,230.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/VAT/01, dated 19 th April, 2022, on VAT for the 2021 YOA.
				2018	NIL	TAX INVESTIGATION WAS CARRIED OUT	344,028.00	The additional assessment of N344,028.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/01, dated 6 th May, 2022, on EDT for the 2018 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N344,028.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/01, dated 6 th May, 2022, on EDT for the 2018 YOA.

				2019	NIL	TAX INVESTIGATION WAS CARRIED OUT	191,204.00	The additional assessment of N191,204.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/04, dated 6 th May, 2022, on EDT for the 2019 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N191,204.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/01, dated 6 th May, 2022, on EDT for the 2019 YOA.
				2020	NIL	TAX INVESTIGATION WAS CARRIED OUT	71,805.00	The additional assessment of N71,805.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/03, dated 6 th May, 2022, on EDT for the 2020 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N71,805.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/03, dated 6 th May, 2022, on EDT for the 2020 YOA.

			VAT	2021	NIL	TAX INVESTIGATION WAS CARRIED OUT	106,204.00	The additional assessment of N106,204.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/02, dated 6 th May, 2022, on EDT for the 2021 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N106,204.00 raised on the Company by the FIRS as per the Tax Investigation exercise carried out on years of accounts of 2017 – 2021 via Letter of Intent with Reference No. FIRS/TID/SD/02153123-0001/355/004, dated 19 th April, 2022 and Assessment No. ENU/MSTO/INV/EDT/02, dated 6 th May, 2022, on EDT for the 2021 YOA.	
				2018	N/A	DESK REVIEW WAS CARRIED OUT	858,244.00	The additional assessment of N858,244.00 raised on the Company by the FIRS as per the Desk Review exercise carried out on years of accounts of 2017 – 2019 via Letter of Intent with Reference No. ENU/MSTO/02153123-0001/2021/001, dated 6 th August, 2021 on WHT for the 2018 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N858,244.00 raised on the Company by the FIRS as per the Desk Review exercise carried out on years of accounts of 2017 – 2019 via Letter of Intent with Reference No. ENU/MSTO/02153123-0001/2021/001, dated 6 th August, 2021 on WHT for the 2018 YOA.	

				2019	N/A	DESK REVIEW WAS CARRIED OUT	998,913.00	The additional assessment of N998,913.00 raised on the Company by the FIRS as per the Desk Review exercise carried out on years of accounts of 2017 – 2019 via Letter of Intent with Reference No. ENU/MSTO/02153123-0001/2021/001, dated 6 th August, 2021 on WHT for the 2019 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N998,913.00 raised on the Company by the FIRS as per the Desk Review exercise carried out on years of accounts of 2017 – 2019 via Letter of Intent with Reference No. ENU/MSTO/02153123-0001/2021/001, dated 6 th August, 2021 on WHT for the 2019 YOA.	
				2020	N/A	DESK REVIEW WAS CARRIED OUT	1,250,000.00	The additional assessment of N1,250,000.00 raised on the Company by the FIRS as per the Desk Review exercise carried out on years of accounts of 2017 – 2019 via Letter of Intent with Reference No. ENU/MSTO/02153123-0001/2021/001, dated 6 th August, 2021 on WHT for the 2020 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N1,250,000.00 raised on the Company by the FIRS as per the Desk Review exercise carried out on years of accounts of 2017 – 2019 via Letter of Intent with Reference No. ENU/MSTO/02153123-0001/2021/001, dated 6 th August, 2021 on WHT for the 2020 YOA.	

			EDT	2018	NIL	TAX AUDIT WAS CARRIED OUT	1,171,705,949.00	The additional assessment of N1,171,705,949.00 (2013 – N233,873,254; 2014 – N233,873,254; 2015 – N297,420,260; 2016 – N209,161,109; 2017 – N14,207,198; & 2018 – N183,170,892) raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021 were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N1,171,705,949.00 (2013 – N233,873,254; 2014 – N233,873,254; 2015 – N297,420,260; 2016 – N209,161,109; 2017 – N14,207,198; & 2018 – N183,170,892) raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021.	
				2019	NIL	TAX AUDIT WAS CARRIED OUT	244,280,217.00	The additional assessment of N244,280,217.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021 for 2019 YOA were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N244,280,217.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021 for 2019 YOA.	

			2020	18,136,016.00	TAX AUDIT WAS NOT CARRIED OUT	5,440,804.80	The Capital Allowance of N18,136,016.00 was claimed by the Company in 2020 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N5,440,804.80 (i.e. CIT of 30% on N18,136,016.00) additional Tax liability.	The Company should be made to pay the additional tax liability of N5,440,804.80 on Capital Allowance claimed.	
			2021	16,697,844.00	TAX AUDIT WAS NOT CARRIED OUT	5,009,353.20	The Capital Allowance of N16,697,844.00 was claimed by the Company in 2021 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N5,009,353.20 (i.e. CIT of 30% on N16,697,844.00) additional Tax liability.	The Company should be made to pay the additional tax liability of N5,009,353.20 on Capital Allowance claimed.	
		WHT	2018	NIL	TAX AUDIT WAS CARRIED OUT	79,824,159.00	The additional assessment of N79,824,159.00 (2013 – N16,237,511; 2014 – N16,237,511; 2015 – N19,967,754; 2016 – N14,080,971; 2017 – N1,070,946; & 2018 – N12,228,467) raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021 on EDT were	The Company should be made to pay the additional tax liability of N79,824,159.00 (2013 – N16,237,511; 2014 – N16,237,511; 2015 – N19,967,754; 2016 – N14,080,971; 2017 – N1,070,946; & 2018 – N12,228,467) raised on the Company by the FIRS as per the Tax Audit exercise	

					yet to be paid by the company.	carried out on years of accounts of 2013 – 2018 on EDT via Letter of Intent dated 22 nd February, 2021.	
2019	NIL	TAX AUDIT WAS CARRIED OUT	16,172,371.00	The additional assessment of N16,172,371.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021 on EDT were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N16,172,371.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 on EDT via Letter of Intent dated 22 nd February, 2021.		
2018	N/A	TAX AUDIT WAS CARRIED OUT	87,082.00	The additional assessment of N87,082.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 via Letter of Intent dated 22 nd February, 2021 on WHT were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N87,082.00 raised on the Company by the FIRS as per the Tax Audit exercise carried out on years of accounts of 2013 – 2018 on WHT via Letter of Intent dated 22 nd February, 2021.		

8	SONGHAI NIGERIA PARTNERS HIP INITIATIVE LTD/GTE	14663 322- 0001	CIT	2018	6,987,774.00	DESK REVIEW	3,666,495.20	<p>The additional TAX DUE from assessment N1,537,163.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N6,987,774 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N209,632.20 (i.e. CIT of 30% on N6,987,774.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N366,495.20 (i.e. N209,632.20 PlusN1,537,163.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N3,666,495.20 which should be raised against the company to pay as claimed.(N209,632.20 plusN1,537,163.00
				2019	3,400,141.00	DESK REVIEW	14,958,320.30	<p>The additional assessment of N3,737,855.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No: LTO/AWK/CIT-INV/038AD, were yet to be paid by the company.</p> <p>The Capital Allowance of N3,400,141.00 claimed by the</p>	The Company should be made to pay additional tax liability of N14,958,320.30 (i.e. N11,220.465.30 plus N3,737855.00) as a result of Tax Investigation findings on CIT for the 2019 Assessment year.

					<p>Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to (i.e. CIT of 30% on N3,400,141.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability N14,958,320.30 (i.e. N11,220,465.30.00 plus N3,737,855.00 plus N3,737,855.00) on the excess of relief claimed.</p>			
			2020	1,138,741.00	DESK REVIEW	2,933,996.30	<p>The additional assessment of N2,592,374.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year via Assessment No: TID/SD/CIT/0010 dated 2nd September, 2022, were yet to be paid by the company.</p> <p>The Capital Allowance of N1,138,741.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will</p>	<p>The Company should be made to pay additional tax liability of N2,933,996.30 (i.e. N341,622.30 plus N2,592,374.00 as a result of Tax Investigation findings on CIT for the 2020 Assessment year.</p>

					<p>amount to N341,622.30 (i.e. CIT of 30% on N1,138,741.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N2,933,996.30 (i.e. N341,622.30 plus N2,592,374.000) on the excess of relief claimed.</p>				
				2021	25,835,524.00	DESK REVIEW WAS CONDUCTED	78,916,524.20	<p>The additional assessment of N1,409,967.00 raised on the Company by the FIRS as per Tax Demand Notice on CIT for the 2021 Assessment year via Assessment No: LTO/AWK/CIT-D/009 dated 4th July, 2023, were yet to be paid by the company.</p> <p>The Capital Allowance of N25,835,524.00.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N7,750,657.20 (i.e. CIT of 30% on N25,835,524.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N78,916,524.20 (i.e.N7,750,657.20 plus 1,409,967.00) on the excess of</p>	<p>The Company should be made to pay additional tax liability of N78,916,524.20 (i.e. N7,750657.20 plus N25,835,524.00) on the excess of relief claimed for 2021 Assessment year.</p>

						relief claimed.		
	EDT	2018	NIL	DESK REVIEW	173,300.00	The sum of N173,300.00 should be paid by Churac Oil Nig. Ltd on 29th June, 2022 as Education Tax with Payment Reference numbers: MTA/GA/BA/EDT/AUD/3189659 of 29/6/22 1 Attah Road, Nkpor Agu, Anambra State under - MTO ENUGU Tax Due by the Company from the assessment of 2018	The total Education Tax Due of N173, 300.00 should be paid by the company through the FIRS as claimed	
		2019	NIL	DESK REVIEW	174,352.00	The additional assessment of N174,352.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: MTA/GA/BA/EDT/AUD/3189663, of 29/6/22 1 Attah Road, Nkpor Agu, Anambra State under - MTO ENUGU Tax Due by the Company from the assessment of 2019 were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N174,352.00.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	

			WHT	2020	NIL	DESK REVIEW	34,361.00	<p>The additional assessment of N34,361.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year via Assessment No: MTA/GA/BA/EDT/AUD/3189693, of 29/6/22 1 Attah Road,Nkpor Agu, Anambra State under - MTO ENUGU Tax Due by the Company from the assessment of 2020, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N34,361.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.	
9.	CHURAC OIL NIG. LTD	01671 783-0001	CIT	2021	NIL	DESK REVIEW	282,014.00	<p>The additional assessment of N282,0149.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year via Assessment No: MTA/GA/BA/EDT/AUD/3189699, of 29/6/22 1 Attah Road,Nkpor Agu, Anambra State under - MTO ENUGU Tax Due by the Company from the assessment of 2021, were yet to be paid by the company.</p>	The Company should be made to pay the additional assessment of N282,014.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year .	

			2019	2,041,150.00	DESK REVIEW	1,640,766.00	<p>The additional assessment of N1,028,421.00 raised on the Company by the FIRS as per CIT notice of additional/ amended assessment for the 2019 Assessment year via Assessment No: EMTO/GA/BA/69/AD, dated 23th October, 2020, were yet to be paid by the company.</p> <p>The Capital Allowance of N2,041,150.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N612,345.00 (i.e. CIT of 30% on N2,041.150.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,640,766.00 (i.e. N612,345.00 plus N1,028,421.00) on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N1,640,766.00 (i.e. N612,345 plus N1,028,421.00) on the excess of relief claimed.</p>	
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			2020	2,165,114.00	TAX INVESTIGATION WAS CARRIED OUT	1,755,951.38	<p>The additional assessment of N1,106,417.18 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year via Assessment No: EMTO/GA/08/AD, dated 23th October, 2020, were yet to be paid by the company.</p> <p>The Capital Allowance of N2,165,114.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N 649,534.20(i.e. CIT of 30% on N2,165,114.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,755,951.38(i.e. N649,534.20 plus N1,106,417.18) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N1,755,951.38(i.e N649,534.20 plus N1,106,417.180) on the excess of relief claimed.	
		EDT	2018	N/A	DESK REVIEW	1,161,161.25	<p>From the assessment of Tax investigation exercise for 2018 the VAT due for payment from the computation of Value Added Tax with reference NO: FIRS/JTF/CON/18/01375519 -001 Dated December,2018 is N1,161,161.25 carried out in the period under review.</p>	VAT liability from the company during the assessment period under review tha was carried out by FIRS IS N 1,161,161.25 should be paid	

				2019	NIL	DESK REVIEW	88,575.00	The additional assessment of N88,575,00 raised on the Company by the FIRS as per notice of additional/ amended assessment for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/60/AD, dated 23th October, 2020, were yet to be paid by the company on Education Tax due for the 2019 Assessment yea. company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N88,575.00 raised on the Company by the FIRS for Education Tax due for the 2019 Assessment year.	
				2020	NIL	DESK REVIEW	96,913.43	The additional assessment of N96,913.43 raised on the Company by the FIRS as additional assessment on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/ET/08/AD, dated 23th October, 2020, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N96,913.43 raised on the Company by the FIRS as additional assessment on Education Tax due for the 2020 Assessment year.	
				2018	N/A	TAX INVESTIGATION WAS CARRIED OUT	558,247.50	The amount of N558,247.50 Tax Investigation raised in the assessment Notice with Reference Number: FIRS/JTF/CON/18/01375519 -0001 December, 2018 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company. The Company should be made to pay the tax liability as reflected	The Company should be made to pay the sum of N558,247.50 raised in the tax Investigation exercise assessment Notices with Reference number:LTO/AWK/WHT-INV/125 dated 5th October, 2021, against the Company by the FIRS for failure to pay WHTax on the due date.	

								above.		
10	FIREBRAND INDUSTRIE S LTD	01375 519- 0001	CIT	2019	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	No Tax investigation was carried out in the period under review.	No Tax investigation was carried out in the period under review.	
				2020	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	No Tax investigation was carried out in the period under review.	No Tax investigation was carried out in the period under review.	
				2021	N/A	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	No Tax investigation was carried out in the period under review.	No Tax investigation was carried out in the period under review.	
		VAT	2018	2,820,000.00	DESK REVIEW	4,261,395.50	<p>The additional/ Amended assessment of N3,415,395.50 raised on the Company by the FIRS as assessment of notice on findings on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/INVE/12ADOF 27/12/2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N2,820,000.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N846,000.00 (i.e. CIT of 30% on N3,415,395.50) additional Tax liability.</p> <p>In total, the Company should be</p>	The Company should be made to pay additional tax liability of N4,261,395.50 (i.e. N846,000.00 Plus 3,415,395.50) on the excess of relief claimed.		

						made to pay additional tax liability of N4,261,395.50 (i.e.N846,000.00 Plus3,415,395.50) on the excess of relief claimed.	
	EDT	2019	14,350,000.00	TAX REVIEW WAS CARRIED OUT	8,386,485.40	<p>The additional assessment of N4,081,485.40 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No:EMTO/GA/BA/INVE/12ADOF 27/12/2021 , were yet to be paid by the company.</p> <p>The Capital Allowance of N14,350,000.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N4,305,000.00 (i.e. CIT of 30% on N14,350,000.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability ofN8,386,485.40 (i.e. N4,305,000.00 plusN4,081,485.40) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N8,386,485.40 (i.e. N4,305,000.00 plusN4,081,485.40) on the excess of relief claimed.

			2020		TAX INVESTIGATION WAS CARRIED OUT	NIL	No additional CIT Liability outstanding. The tax was paid evidence of payment seen	No additional CIT Liability outstanding. The tax was paid evidence of payment seen	
			2021		TAX INVESTIGATION WAS NOT CARRIED OUT	NIL	No additional CIT Liability outstanding. The tax was paid evidence of payment seen	No additional CIT Liability outstanding. The tax was paid evidence of payment seen	
	WHT		2018	NIL	DESK REVIEW	316,741.30	The additional assessment of N316,741.30 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year via Assessment No:EMTO/GA/BA/ET//INVE/12AD OF 27/12/2021, , were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N316,741.30.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year.	
			2019	NIL	DESK REVIEW	610,763.56	The additional assessment of N610,763.56 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET//INVE/12ADOF 27/12/2021, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N610,763.56 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	
			2020	NIL	TAX INVESTIGATION	NIL	TAX was carried out no outstanding of additional liability	TAX was carried out no outstanding of additional	

						WAS CARRIED OUT			liability	
				2021	NIL	DESK REVIEW	NIL	TAX was carried out no outstanding of additional liability	TAX was carried out no outstanding of additional liability	
11	FIDELITY STRUCTURES LTD	15828 745-0001	CIT	2020	14,423,195.00	DESK REVIEW WAS CARRIED OUT	5,040,780.50	<p>The additional assessment of N713,822.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2020 Assessment year via Assessment No: EMTO/GA/BA/CIT/INVE/250AD, dated on 2/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N14,423,195.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N4,326,958.50 (i.e. CIT of 30% on N713,822.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N5,040,780.50 (i.e. N4,326,958.50 plus N4,326,958.50) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N5,040,780.50 (i.e. N4,326,958.50 plus N4,326,958.50) on the excess of relief claimed.	

			2021	22,973,094.00	DESK REVIEW	8,156,956.20	<p>The Company Income Tax of N1,265,028.00 was raised on the Company by the FIRS through the Taxpromax platform for the 2021 Assessment year, which sum were yet to be paid by the company. The Capital Allowance of N22,973,094.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N6,891,923.20 (i.e. CIT of 30% on N1,265,028.00.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N8,156,956.20 (i.e N6,891,928.20 plus N1,265,028.00) on the excess of relief claimed. In total, the Company should be made to pay additional tax liability of N8,156,956.20 (ie N6,891928.20 plus N1,265,028.00) on the excess of relief claimed.</p>	<p>The Company should be made to pay the additional tax liability of N8,156,956.20 (i.eN6,891,928.00 plus N1,265,028.00) on the excess of relief claimed, which were yet to be paid by the company.</p>	
			2020	NIL	DESK REVIEW	43,268.00	<p>The additional assessment of N43,789,264.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/INVE/248AD,</p>	<p>The Company should be made to pay the additional assessment of N43,268.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020</p>	

						dated on 2/11/2021 were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	Assessment year.	
		2021	NIL	DESK REVIEW	80,522.00	The additional assessment of N80,522.00 raised on the Company by the FIRS as per the Income Tax Assessment due for the 2021 Assessment year with Assessment NO: EMT0/GA/ET/INVE/06AD, dated on 2/11/2021 were yet to be paid by the company. The Company should be made to pay the Tax liability due as reflected above.	The Company should be made to pay the Tax liability of N80,522.00 raised on the Company by the FIRS as per the Taxpromax Company Income Tax Assessment due for the 2021 Assessment year.	
	EDT	2020	N/A	DESK REVIEW	350,687.00	The additional assessment of N350,687.00 raised on the Company by the FIRS as per the Tax Audit on WHTax due for the 2020 Assessment year via Assessment No: FIRS/TID/SD/01286349/309/4, dated 3rd Junnovember, 2021, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N350,687.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2018 Assessment year.	

				2021	N/A	DESK REVIEW	599,991.00	<p>The additional assessment of N599,991.00 raised on the Company by the FIRS as per the Tax Audit on WHTax due for the 2021 Assessment year via Assessment No: FIRS/TID/SD/01286349/309/4, dated 3rd Jun - November, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N599.991.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2018 Assessment year.</p>
				2018	26,968,785.00	TAX AUDIT WAS CARRIED OUT	11,561,073.50	<p>The additional assessment of N3,470,438.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/CIT/AUD/125AD, dated on 26/5/2021 were yet to be paid by the company.</p> <p>The Company claimed Capital Allowance of N26,968,785.00 in the 2019 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N8,090,635.50 (i.e. CIT of 30% on N26,968,785.00) additional Tax liability. In total, the Company should be made to pay additional tax liability of</p>	<p>The Company should be made to pay additional tax liability of NN11,561,073.50 i.e (N15,489,087.00(i.e. CIT of 30% on N8,090,635.50 plus N3,470,438) on the excess of relief claimed.</p>

								N11,561,073.50 (i.e N8,090,635.50 plus N3,470,438.00) on the excess of relief claimed.	
				2019	18,823,979.00	TAX AUDIT WAS CARRIED OUT	5,922,855.70	<p>The additional assessment of N275,662.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/CIT/AUD/126AD, dated on 26/5/2021 were yet to be paid by the company.</p> <p>The Company claimed Capital Allowance of N18,823,979.00 in the 2019 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N5,647,193.70 (i.e. CIT of 30% on N18,823,979.00) additional Tax liability. In total, the Company should be made to pay additional tax Liability of N5,922,855.70 (i.e N5,647,193.70 plus N275,665.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N5,922,855.70 (i.e N5,647,193.70 plus N275.662.00) on the excess of relief claimed.
12	FLEMING LTD	01286 349-0001	CIT	2020	8,542,349.00	TAX AUDIT WAS CARRIED OUT	5,816,850.70	The additional assessment of N3,254,146.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2020 Assessment year via Assessment No: EMTO/SA/13/OF, dated on 23/6/2020 were yet to be paid by the company.	The Company should be made to pay additional tax liability of N5,816,850.70 (i.e. CIT of 30% on N2,562,704.70 plus N3,254,146,00) on the excess of relief claimed.

						<p>The Company claimed Capital Allowance of N8,542,349.00 in the 2020 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N2,562,704.70 (i.e. CIT of 30% on N8,542,349.00) additional Tax liability. In total, the Company should be made to pay additional tax liability of N5,816,850,70 (i.e N2,562,704 plus N3,254,146) on the excess of relief claimed.</p>	
	2021	26,264,190.00	DESK REVIEW WAS CONDUCTED	15,489,087.00	<p>The additional assessment of N7,609,830.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2020 Assessment year via Assessment No: EMTO/SA/13/OF, dated on 23/6/2020 were yet to be paid by the company.</p> <p>The Company claimed Capital Allowance of N26,264,190.00 in the 2020 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N7,879,257.00 (i.e. CIT of 30% on N26,264,190.00)</p>	<p>The Company should be made to pay additional tax liability of N15,489,087.00(i.e. CIT of 30% on N7,879,257.00 plus N7,609,830.00) on the excess of relief claimed.</p>	

					additional Tax liability. In total, the Company should be made to pay additional tax liability of N15,489,087.00 (i.e N7,879,257.00 plus N7,609,830.00) on the excess of relief claimed.	
	2018	NIL	TAX AUDIT WAS CARRIED OUT	155,934.00	<p>The additional assessment of N155,934.00.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/120AD, dated on 26/5/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The total Education Tax Due of N155,934.00 should be paid by the company through the FIRS as claime
	2019	NIL	TAX AUDIT WAS CARRIED OUT	104,341.00	<p>The additional assessment of N104,341.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/122AD, dated on 26/5/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The total Education Tax Due of N136,735.00.00 should be paid by the company through the FIRS as claime

			2020	NIL	TAX AUDIT WAS CARRIED OUT	1,185,336.00	<p>The additional assessment of N1,185,336.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/125AD, dated on 21/5/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The total Education Tax Due of N1,185,336.00 should be paid by the company through the FIRS as claimed	
			2021	NIL	NO DESK REVIEW CONDUCTED	136,735.00	<p>The additional assessment of N136,735.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/122AD, dated on 26/5/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The total Education Tax Due of N136,735.00 should be paid by the company through the FIRS as claimed	
		WHT	2018	2,314,109.00	DESK REVIEW	3,338,195.70	<p>The additional assessment of N2,643,963.00 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2018 Assessment year via Assessment No: MTA/GA/BA/CIT/AUD/5144389 OF 30/03/2023, were yet to be paid by the company.</p> <p>The Company claimed Capital Allowance of N2,314,109.00 in the 2018 YOA without evidence of</p>	The Company should be made to pay additional tax liability of N3,338,195.70 (i.e.N694,232.70 plus N2,643,963.00) on the excess of relief claimed. raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2018 Assessment year via Assessment No:	

						<p>Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N694,232.70 (i.e. CIT of 30% on N2,314,109.00) additional Tax liability. In total, the Company should be made to pay additional tax Liability of N3,338,195.70 (i.e N694,232.70 plus N2,643,963.00) on the excess of relief claimed.</p>	<p>MTA/GA/BA/CIT/AUD/5144389 O30/03/, 2023.</p>
	2019	14,715,020.00	DESK REVIEW	6.412,682.90	<p>The additional assessment of N1,932,833.00 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2019 Assessment year via Assessment No: MTA/GA/BA/CIT/AUD/5144410 OF 30/03/2023 were yet to be paid by the company. The Company claimed Capital Allowance of N14,932,833.00 in the 2019 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N4,479,849.00 (i.e. CIT of 30% on N14,932,833.00) additional Tax liability. In total, the Company should be made to pay additional tax Liability of N6,412,682.90 (i.e N4,479,849.90</p>	<p>The Company should be made to pay additional tax liability of N6,412,682.90 (I.e N4,479,849.90 plus N1,932,833.00) on the excess of relief claimed raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2019 Assessment year</p>	

						plus N1,932,833.00) on the excess of relief claimed.	
	2020	12,340,442.00	DESK REVIEW	4,672,355.60	<p>The additional assessment of N970,224.00 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2020 Assessment year via Assessment No: TA/GA/BA/CIT/AUD/5144422 of 30/03/2023, were yet to be paid by the company.</p> <p>The Company claimed Capital Allowance of N12,340,442.00 in the 20208 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N3,702,132.60 (i.e. CIT of 30% on N12,340,442.00) additional Tax liability. In total, the Company should be made to pay additional tax Liability of N4,672,356.60 (i.e N3,702,132.60 plus N970,224.00) on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N4,672,356.60 (i.e N3,702,132.60 plus N970,224.00) on the excess of relief claimed.</p> <p>raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2020 Assessment year</p>	

				2018	NIL	DESK REVIEW WAS DONE	92,881.00	<p>The additional assessment of N92,881.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2018 Assessment year via Assessment No: MTA/GA/BA/EDT/AUD/5144389 OF 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N52,445.26 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2018 Assessment year.</p>	
13	JUHEL NIG. LTD	00440 202-0001	CIT	2019	NIL	DESK REVIEW WAS DONE	386,567.00	<p>The additional assessment of 386,567.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2019 Assessment year via Assessment No: MTA/GA/BA/EDT/AUD/5144410 OF 30/03/ 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N386,567.00 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2019 Assessment year.</p>	

				2020	NIL	DESK REVIEW WAS DONE	194,045.00	<p>The additional assessment of N194,045.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: MTA/GA/BA/EDT/AUD/5144422 OF 30/03/ 2023, dated 21st September, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N194,045.00 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2020 Assessment year.</p>	
				2019	29,898,860.00	DESK REVIEW NOT SEEN	8,969,658.00	<p>The Capital Allowance of N29,898,860.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N8,969,658.00 (i.e. CIT of 30% on N29,898,860.00) additional Tax liability.</p>	<p>The Company should be made to pay additional tax liability of N8,969,658.00 as a result of none presentation of CAFA on CIT for the 2019 Assessment year.</p>	

			EDT	2020	40,487,499.00	DESK REVIEW NOT SEEN	12,146,249.70	The Capital Allowance of N40,487,499.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N12,146,249.70 (i.e. CIT of 30% on N40,487,499.00) additional Tax liability.	The Company should be made to pay additional tax liability of N12,146,249.70 as a result of none presentation of CAFA on CIT for the 2020 Assessment year.	
				2021	44,118,053.00	DESK REVIEW NOT SEEN	13,235,415.90	The Capital Allowance of N44,118,053.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N13,235,415.90 (i.e. CIT of 30% on N44,118,053.00) additional Tax liability.	The Company should be made to pay additional tax liability of N13,235,415.90 as a result of none presentation of CAFA on CIT for 2021 Assessment year.	
				2018	NIL	TAX AUDIT	3,780,079.00	The additional assessment of N3,780,079.00 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2018 Assessment year via Assessment No: EMTO/VAT/106/2021 dated 25th August, 2021, were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N3,780,079.00 for the 2018 Assessment year.	

				2019	N/A	NO VAT MONITORING EXERCISE	NIL	No VAT Monitoring exercise was carried out in the period under review.	The Company should be made to pay additional VAT liability of N114,603,510.00 for the 2019 Assessment year.	
14	PALM PETROLEUM OIL LTD	00768 432-0001	CIT	2020	N/A	NO VAT MONITORING EXERCISE	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
				2021	N/A	NO VAT MONITORING EXERCISE	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
				2018	NIL	TAX INVESTIGATION WAS NOT SEEN	NIL	No EDT Monitoring exercise was carried out in the period under review.	EDT Monitoring exercise should be conducted for the period under review.	
			EDT	2019	NIL	TAX INVESTIGATION WAS NOT SEEN	NIL	No EDT Monitoring exercise was carried out in the period under review.	EDT Monitoring exercise should be conducted for the period under review.	
				2020	NIL	TAX INVESTIGATION WAS NOT SEEN	NIL	No EDT Monitoring exercise was carried out in the period under review.	EDT Monitoring exercise should be conducted for the period under review.	
				2021	NIL	TAX INVESTIGATION WAS NOT SEEN	NIL	No EDT Monitoring exercise was carried out in the period under review.	EDT Monitoring exercise should be conducted for the period under review.	
15	BRASS ENGR COY NIG LTD	01084 760-0001	CIT	2019	N/A	TAX INVESTIGATION WAS NOT SEEN	NIL	No WHT Monitoring exercise was carried out in the period under review.	WHT Monitoring exercise should be conducted for the period under review.	

			2020	N/A	TAX INVESTIGATION WAS NOT SEEN	NIL	No WHT Monitoring exercise was carried out in the period under review.	WHT Monitoring exercise should be conducted for the period under review.	
			2021	N/A	TAX INVESTIGATION WAS NOT SEEN	NIL	No WHT Monitoring exercise was carried out in the period under review.	WHT Monitoring exercise should be conducted for the period under review.	
			2018	49,463,767.00	TAX INVESTIGATION WAS CARRIED OUT	14,888,741.10	<p>The additional assessment of N49,611.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/AUD/03AD, dated 14th January, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N49,463,767.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N14,839,130.10 (i.e. CIT of 30% on N49,463,767.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N14,888,741.10 (i.e. N49,611.00 plus N14,839,130.10) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N14,888,741.10 (i.e. N49,611.00 plus N14,839,130.10) on the excess of relief claimed.	

			VAT	2019	270,488,178.00	TAX INVESTIGATION WAS CARRIED OUT	81,199,688.40	<p>The additional assessment of N53,235.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/BA/AUD/02AD, dated 14th January, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N270,488,178.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N81,146,453.40 (i.e. CIT of 30% on N270,488,178.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N81,199,688.40 (i.e. N53,235.00 plus N81,146,453.40) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N81,199,688.40 (i.e. N53,235.00 plus N81,146,453.40) on the excess of relief claimed.	
				2020	134,350,447.00	TAX INVESTIGATION WAS CARRIED OUT	40,305,134.10	<p>The Capital Allowance of N134,350,447.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be</p>	The Company should be made to pay additional tax liability of N40,305,134.10 on the excess of relief claimed.	

					subjected to tax which will amount to N40,305,134.10 (i.e. CIT of 30% on N134,350,447.00) additional Tax liability.		
	2021	148,267,973.00	TAX AUDIT WAS CARRIED OUT	50,155,571.00	<p>The administrative assessment of N5,675,179.10 was raised on the Company by the FIRS on CIT for the 2021 Assessment year via letter Reference No: MTO/RPP/03955902-0001/2021/01, dated 5th August, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N148,267,973.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N44,480,391.90 (i.e. CIT of 30% on N148,267,973.00.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N50,155,571.00 (i.e. N5,675,179.10.00 plus N44,480,391.90) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N626,186,389.20 (i.e. NN54,000,000.00 plus N572,186,389.20) on the excess of relief claimed.	
	2018	N/A	NO VAT MONITORING	NIL	No VAT Monitoring exercise was carried out in the period under	VAT Monitoring exercise should be conducted for the	

			EXERCISE WAS CONDUCTED		review.	period under review.	
EDT	2019	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
	2020	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
	2021	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
	2018	NIL	TAX INVESTIGATION WAS CARRIED OUT	10,071.66	The additional assessment of N10,071.66 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/02AD, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N10,071.66 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year.	
WHT	2019	NIL	TAX INVESTIGATION WAS CARRIED OUT	10,823.66	The additional assessment of N10,823.66 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/01AD, were yet to be paid by the company.	The Company should be made to pay the additional assessment of N10,823.66 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	

								The Company should be made to pay additional tax liability as reflected above.		
				2020	NIL	TAX INVESTIGATION WAS NOT SEEN	NIL	No EDT Monitoring exercise was carried out in the period under review.	EDT Monitoring exercise should be conducted for the period under review.	
				2021	NIL	DESK REVIEW WAS NOT SEEN	NIL	No EDT Monitoring exercise was carried out in the period under review.	EDT Monitoring exercise should be conducted for the period under review.	
				2018	N/A	TAX INVESTIGATION WAS NOT SEEN	NIL	No WHT Monitoring exercise was carried out in the period under review.	WHT Monitoring exercise should be conducted for the period under review.	
16	GLOBAL MEMFYS & COY LTD	03955 902-0001	CIT	2019	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	No WHT Monitoring exercise was carried out in the period under review.	WHT Monitoring exercise should be conducted for the period under review.	
				2020	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	No WHT Monitoring exercise was carried out in the period under review.	WHT Monitoring exercise should be conducted for the period under review.	
				2021	N/A	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	No Tax investigation was carried out in the period under review.	No Tax investigation was carried out in the period under review.	
				2018	NIL	DESK REVIEW WAS CARRIED OUT	387,342.00	The additional assessment of N387,342.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year via Assessment, dated 29/42019 were yet to be paid by the company.	The Company should be made to pay additional tax liability of N387,342.00 on the CIT reassessment.	
			VAT	2019	NIL	INVESTIGATION WAS CARRIED OUT	962,565.00	The additional assessment of N962,565.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No:	The Company should be made to pay additional tax liability of N962,565.00 on the amended assessment	

					MTA/GA/BA/CIT/2751291, were yet to be paid by the company.	
	2020	20,826,665.00	TAX INVESTIGATION WAS CARRIED OUT	17,470,721.50	<p>The additional assessment of N11,222,722.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year via Assessment No: MTA/GA/BA/CIT/2751216 were yet to be paid by the company.</p> <p>The Capital Allowance of N20,826,665.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N6,247,999.50 (i.e. CIT of 30% on N20,826,665.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N17,470,721.50 (i.e. N6,247,999.50 plus N11,222,722.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N219,995,575.40 (i.e. N8,620,745.00 plus N211,374,830.40) on the excess of relief claimed.
	2021	NIL	NOT SEEN	NIL	Tax investigation not carried out	Tax investigation should be conducted

		2018	N/A	VAT Monitoring not seen	NIL	VAT Monitoring not carried out	VAT Monitoring exercise should be conducted for the period under review.	
	EDT	2019	N/A	VAT Monitoring not seen	NIL	VAT Monitoring not carried out	VAT Monitoring exercise should be conducted for the period under review.	
		2019	NIL	TAX INVESTIGATION WAS CARRIED OUT	69,521.00	The additional assessment of N69,521.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: MTA/GA/BA/EDT/2751291, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N69,521.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	
		2020	NIL	TAX INVESTIGATION WAS CARRIED OUT	837,050.00	The additional assessment of N837,050.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year via Assessment No: MTA/GA/BA/EDT/2751276, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N837,050.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.	
		2019	N/A	N/A	NIL	NIL	Tax Audit must be conducted on the Company to ascertain the WHTax payable during the period under review.	

			WHT	2018	NIL	TAX AUDIT WAS CARRIED OUT	20,386,914.00	<p>The additional assessment of N20,386,914.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/CIT/AUD/203, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay additional tax liability of N20,386,914.00 on the additional assessment on CIT.	
				2019	NIL	TAX AUDIT WAS CARRIED OUT	21,200,197.00	<p>The additional assessment of N21,200,197.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/CIT/AUD/202, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay additional tax liability of N21,200,197.00 on the additional assessment on CIT.	
				2018	NIL	TAX AUDIT WAS CARRIED OUT	2,998,733.00	<p>The additional assessment of N2,998,733.00.00 raised on the Company by the FIRS as per the Tax Audit on Value Added Tax due for the 2018 Assessment year via Assessment No: ENU/MTO/FDE/00412898/2022/01, dated 24th March, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N2,998,733.00 raised on the Company by the FIRS as per the Tax Audit conducted on Value Added Tax due for the 2018 Assessment year.	

				2018	NIL	TAX AUDIT WAS CARRIED OUT	1,011,166.00	<p>The additional assessment of N1,011,166.00.00 raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2018 Assessment year via Assessment No: ENU/MTO/FDE/00412898/2022/01, dated 24th March, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N1,011,166.00 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2018 Assessment year.	
17	OWENI NIG LTD	00189 512-0001	CIT	2019	NIL	TAX AUDIT WAS CARRIED OUT	801,821.00	<p>The additional assessment of N801,821.00 raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2019 Assessment year via Assessment No: ENU/MTO/FDE/00412898/2022/01, dated 24th March, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N801,821.00 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2019 Assessment year.	
				2018	N/A	TAX AUDIT WAS CARRIED OUT	148,718.00	<p>The additional assessment of N148,718.00 raised on the Company by the FIRS as per the Tax Audit on WHTax due for the 2018 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to</p>	The Company should be made to pay the additional assessment of N148,718.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2018 Assessment year.	

					pay additional tax liability as reflected above.		
		2019	N/A	TAX AUDIT WAS CARRIED OUT	6,567.00	<p>The additional assessment of N6,567.00 raised on the Company by the FIRS as per the Tax Audit on WHTax due for the 2019 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N6,567.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2019 Assessment year.
		2020	N/A	TAX AUDIT WAS CARRIED OUT	NIL	NIL	NIL
	VAT	2021	N/A	DESK REVIEW WAS CONDUCTED	113,719,919.00	<p>The additional assessment of N113,719,919.00 raised on the Company by the FIRS as per the Desk Review on WHTax due for the 2021 Assessment year via Assessment No: LTO/AWK/WHT/003, dated 23rd March, 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N113,719,919.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2021 Assessment year.
		2018	NIL	DESK REVIEW	548,550.00	The additional assessment of N548,550.00 raised on the Company by the FIRS as per the	The Company should be made to pay additional tax liability of N548,550.00

						Desk Review on Company Income Tax due for the 2018 Reassessment year, dated 17th October, 2019, were yet to be paid by the company.	raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2018 Assessment year via Assessment.	
	EDT	2019	75,846,980.00	DESK REVIEW	23,354,294.00	<p>The additional assessment of N600,200.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment, dated 17th October, 2019, were yet to be paid by the company.</p> <p>The Capital Allowance of N75,846,980.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N22,754,094.00 (i.e. CIT of 30% on N75,846,980.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N23,354,294.00 (i.e. N600,200.00 plus N22,754,094) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N23,354,294.00 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2019 Assessment year.	

			2020	384,670,580.00	DESK REVIEW	116,635,268.00	<p>The additional assessment of N1,234,094.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year via Assessment, dated 7th June,2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N384,670,580.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N115,401,174.00 (i.e. CIT of 30% on N384,670,580.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N116,635,268.00 (i.e. N1,234,094.00 plus N115,401,174.00) on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N19,981,516.69 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2020 Assessment year via Assessment No: LTO/AWK/CIT-INV/098, dated 21st September, 2021.</p>	
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			2021	20,080.00	DESK REVIEW	10,618,901.30	<p>The additional assessment of N798,854.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2021 Assessment year via Assessment, dated 28th January, 2022, were yet to be paid by the company.</p> <p>The Capital Allowance of N21,268,760.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N6,380,628.00 (i.e. CIT of 30% on N21,268,760.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N7,179,482.00 (i.e. N798,854.00 plus N6,380,628.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N7,179,482.00 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2021 Assessment year via Assessment	
			WHT	2020	NIL	334,713.38	<p>The additional assessment of N334,713.38 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/BA/GA/ET/131AD, dated 7th June, 2021, were yet to be paid by the company.</p>	The Company should be made to pay the additional assessment of N334,713.38 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2020 Assessment year.	

								The Company should be made to pay additional tax liability as reflected above.		
				2021	N/A	DESK REVIEW WAS DONE	53,257.00	<p>The additional assessment of N53,257 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year via Assessment No: EMTO/BA/GA/ET/011, dated 28th January, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N53,257.00 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2021 Assessment year.	
19	SAM EGENTI & CO LTD	00412 898-0001	CIT	2018	NIL	DESK REVIEW WAS DONE	NIL	NIL	NIL	
				2019	NIL	DESK REVIEW WAS DONE	194,925.00	<p>The additional assessment of N194,925.00 raised on the Company by the FIRS as per the Desk Review on Withholding Tax due for the 2020 Assessment year via Assessment No: EMTO/BA/GA/WHT/15AD, dated 7th JUNE, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as</p>	NIL	

						reflected above.	
	VAT	2020	NIL	DESK REVIEW WAS DONE	280,800.00	<p>The additional assessment of N280,800.00 raised on the Company by the FIRS as per the Desk Review on Withholding Tax due for the 2020 Assessment year via Assessment No: EMTO/BA/GA/WHT/01, dated 27th January, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	NIL
	EDT	2018	NIL	NOT SEEN	NIL	NIL	NIL

			2019	31,348,280.00	TAX AUDIT WAS CARRIED OUT	9,404,484.00	The Capital Allowance of N31,348,280.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N9,404,484.00 (i.e. CIT of 30% on N31,348,280.00) additional Tax liability.	The Company should be made to pay additional tax liability of N10,883,310.00 (i.e. N1,478,826.00 plus N9,404,484.00) on the excess of relief claimed.	
		WHT	2020	27,868,433.00	DESK REVIEW WAS CARRIED OUT	9,090,077.68	<p>The additional assessment of N729,547.78 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year, dated 28th January,2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N27,868,433.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N8,360,529.90 (i.e. CIT of 30% on N27,868,433.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N9,090,077.68(i.e. N729,547.78</p>	The Company should be made to pay additional tax liability of N9,090,077.68(i.e. N729,547.78 plus N8,360,529.90) on the excess of relief claimed.	

								plus N8,360,529.90) on the excess of relief claimed.		
				2021	27,868,433.00	TAX AUDIT WAS CARRIED OUT	8,360,529.90	The Capital Allowance of N27,868,433.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N8,360,529.90 (i.e. CIT of 30% on N27,868,433.00) additional Tax liability.	The Company should be made to pay the sum of sum of N520,000,000.00 raised as additional assessment by the FIRS via Assessment No: LTO/AWK/CIT/011, dated 24th February, 2022.	
				2018	NIL	NOT SEEN	NIL	NIL	NIL	
				2021	NIL	NO VAT MONITORING WAS CONDUCTED	NIL	NIL	The FIRS should conduct a VAT monitoring exercise for the period under review to ascertain the VAT liability for the period.	
20	PRUCTTON ASSOCIATES LTD	19323 967-0001	CIT	2018	N/A	DESK REVIEW NOT SEEN	NIL	NIL	NIL	

				2019	N/A	TAX AUDIT WAS NOT CONDUCTED	NIL	NIL	The FIRS should conduct a Tax Audit exercise for the period under review to ascertain the WHT liability for the period.
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				2020	N/A	TAX AUDIT WAS NOT CONDUCTED	NIL	NIL	The FIRS should conduct a Tax Audit exercise for the period under review to ascertain the WHT liability for the period.	
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			2021	N/A	TAX AUDIT WAS NOT CONDUCTED	NIL	NIL	The FIRS should conduct a Tax Audit exercise for the period under review to ascertain the WHT liability for the period.	
		EDT	2018	28,287,996.00	Additional/amended assessment	15,166,891.80	<p>The additional assessment of N6,680,493.00 raised via Document Ref No. EMTO/GA/BA/CIT/AUD/139Ad dated 21/6/2021 on the Company by the FIRS as per Additional/Ammended Assessment on CIT for the 2018 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N28,287,996.00 claimed by the Company in 2019 YOA was without evidence of Certificate of</p>	The Company should be made to pay additional tax liability of N15,166,891.80 (i.e. N6,680,493.00 plus N8,486,398.80) which should be raised against the company on the excess of relief claimed.	

					<p>Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N8,486,398.80 (i.e. CIT of 30% on N28,287,996.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N15,166,891.80 (i.e. N6,680,493.00 plus N8,486,398.80) on the excess of relief claimed.</p>	
2019	52,114,994.00	Additional/amended assessment	18,590,141.20	<p>The additional assessment of N2,955,643.00 raised via Document Ref No. EMTO/GA/BA/CIT/AUD/138Ad dated 21/6/2021 on the Company by the FIRS as per Additional/Ammended Assessment on CIT for the 2019 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N52,114,994.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N15,634,498.20 (i.e.</p>	<p>The Company should be made to pay additional tax liability of N18,590,141.20 (i.e. N2,955,643.00 plus N15,634,498.20) which should be raised against the company on the excess of relief claimed.</p>	

						<p>CIT of 30% on N52,114,994.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N18,590,141.20 (i.e. N2,955,643.00 plus N15,634,498.20) on the excess of relief claimed.</p>		
				2020	43,290,810.09	19,835,089.32	<p>The Capital Allowance of N43,290,810.09 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N12,987,243.03 (i.e. CIT of 30% on N43,290,810.09) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N19,835,089.32 (i.e. N12,987,243.03 plus N6,847,846.29 which was cahrged on Taxable income as per the company Tax computation but evidence of payment was not traced by us)</p>	<p>The Company should be made to pay additional tax liability of N19,835,089.32 (i.e. N12,987,243.03 plus N6,847,846.29) which should be raised against the company on the excess of relief claimed.</p>

		2018	NIL	Additional/amended assessment	174,966.08	<p>The additional assessment of N174,966.08 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/139Ad, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N174,966.08 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.
	WHT	2019	NIL	Additional/amended assessment	141,676.72	<p>The additional assessment of N141,676.72 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/32AD of 7/8/2020, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N174,966.08 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.
		2018	53,887,500.00	NOT SEEN	16,384,309.00	<p>The Capital Allowance of N53,887,500.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N16,166,250.00 (i.e.</p>	The Company should be made to pay additional tax liability of N16,384,309.00 (i.e. N16,166,250.00 plus N218,059.00) which should be raised against the company on the excess of relief claimed.

								CIT of 30% on N53,887,500.00 additional Tax liability.		
								In total, the Company should be made to pay additional tax liability of N16,384,309.00 (i.e. N16,166,250.00 plus N218,059.00 computed by the company as its CIT liabilities which evidence of payment was not seen for 2018 YOA) on the excess of relief claimed.		
				2019	9,035,000.00	NOT SEEN	5,806,721.00	The Capital Allowance of N10,438,750.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N2,710,500.00 (i.e. CIT of 30% on N9,035,000) additional Tax liability.	The Company should be made to pay additional tax liability of N5,806,721.00 (i.e. N2,710,500.00 plus N3,096,221.00) which should be raised against the company on the excess of relief claimed.	
				2020	10,438,750.00	NOT SEEN	7,269,403.00	The Capital Allowance of N10,438,750.00 claimed by the Company in 2020 YOA was	The Company should be made to pay additional tax liability of N7,269,403.00	
21	OLUCHUK WU OIL & GAS LTD	14547 544-0001	CIT	2020	10,438,750.00	NOT SEEN	7,269,403.00	The Capital Allowance of N10,438,750.00 claimed by the Company in 2020 YOA was	The Company should be made to pay additional tax liability of N7,269,403.00	

							<p>without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N3,131,625.00 (i.e. CIT of 30% on N10,438,750.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N7,269,403.00 (i.e. N3,131,625.00 plus N4,137,778.00 computed by the company as its CIT liabilities which evidence of payment was not seen for 2020 YOA) on the excess of relief claimed.</p>	<p>(i.e. N3,131,625.00 plus N4,137,778.00) which should be raised against the company on the excess of relief claimed.</p>	
				2018	NIL	DESK REVIEW NOT SEEN	NIL	NIL	NIL

			2019	NIL	DESK REVIEW NOT SEEN	NIL	The company submitted a zero VAT returns throughout the year	The Company should be made to justify the submission of a NIL VAT return for the period.	
			2020	NIL	DESK REVIEW NOT SEEN	NIL	The company submitted a zero VAT returns throughout the year	The Company should be made to justify the submission of a NIL VAT return for the period.	
		VAT	2018	N/A	DESK REVIEW NOT SEEN	NIL	NIL	NIL	

			2018	N/A	VAT returns	12,222,317.64	VAT payable in the month of Oct 2018 was N955,058.01, \$25,104.02, Sept N4,791,042.55 \$30,865.91, March N2,951,859.96 Jan N3,524,357.12 as per VAT returns by the company, but evidence of payment into the service account was not sighted	The Company should be made to pay additional tax liability of N12,222,317.64 and \$ 55,969.93 in the absent of justifiable evidence of payment into the appropriate tax account.	
		WHT	2019	N/A	VAT returns	56,588,731.36	VAT payable in the month of November 2019 was N4,914,174.50, July N1,323,317.91, June, N2,408,253.66, May N2,920,554.89 and \$12,530.30 in November, \$10,088.89 October, \$12,889.46 July, \$23,457.02 June, and \$28,446.96 in may making a total of dollar VAT to \$87,413.63 as per VAT returns by the company, but evidence of payment into the service account was not sighted	The Company should be made to pay additional tax liability of N56,588,731.36 and \$ 87,413.63 in the absent of justifiable evidence of payment into the appropriate tax account.	
			2020	N/A	VAT returns	22,511,215.20	VAT payable in the month of November 2020 was N13,514,370.39, June N8,996,844.81 and \$110,133.39 in November, \$87,631.61 in May making a total of dollar VAT to \$197,765.00 as per VAT returns by the company, but evidence of payment into the service account was not sighted	The Company should be made to pay additional tax liability of N22,511,215.20 and \$197,765.00 in the absent of justifiable evidence of payment into the appropriate tax account.	
			2021	N/A	VAT returns	23,278,854.22	VAT payable in the month of March 2021 was N23,278,854.22 and \$11,844.31, as per VAT returns by the company, but evidence of payment into the service account was not sighted	The Company should be made to pay additional tax liability of N23,278,854.22 and \$11,844.31 in the absent of justifiable evidence of payment into	

								the appropriate tax account.	
				2018	70,455,735.00	NOT SEEN	21,136,720.50	The Capital Allowance of N70,455,735.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N21,136,720.50 (i.e. CIT of 30% on N70,455,735.00) additional Tax liability.	The Company should be made to pay additional tax liability of N21,136,720.00 which should be raised against the company on the excess of relief claimed.

22	PETSOW LABORATO RIES LIMITED	00397 926- 0001	CIT	2019	55,540,260.0 0	NOT SEEN	16,662,078.00	The Capital Allowance of N55,540,260.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N16,662,078.00 (i.e. CIT of 30% on N55,540,260.00) additional Tax liability.	The Company should be made to pay additional tax liability of N16,662,078.00 which should be raised against the company on the excess of relief claimed.
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				2020	NIL	DESK REVIEW NOT SEEN	NIL	NIL		NIL	
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			2021	44,064,691.00	NOT SEEN	13,219,407.30	The Capital Allowance of N44,064,691.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N13,219,407.30 (i.e. CIT of 30% on N44,064,691.00) additional Tax liability.	The Company should be made to pay additional tax liability of N16,662,078.00 which should be raised against the company on the excess of relief claimed.	
		EDT	2018	N/A	VAT Monitoring	5,454,471.00	The additional assessment of N5,454,471.00 raised on the Company by the FIRS as per the VAT Assessment notice for 2018 Assessment year via Notice No: MTA/GA/BA/5114646 of 10/3/2023, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N5,454,471.00 which should be raised against the company on the VAT under assessed.	

				2019	N/A	VAT Monitoring	6,475,977.70	The additional assessment of N6,475,977.70 raised on the Company by the FIRS as per the VAT Assessment notice for 2019 Assessment year via Notice No: EMTO/VAT/51/2021 of 7/9/2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N6,475,977.70 which should be raised against the company on the VAT under assessed.	
23	CHANGPU INVESTMENT NIGERIA LIMITED	20227859-0001	CIT	2020	N/A	VAT Monitoring	48,271,077.50	The additional assessment of N48,271,077.50 raised on the Company by the FIRS as per the VAT Re- Assessment notice for 2020 Assessment year via Notice No: MTO/VAT/160/2021 of 11/4/2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N48,271,077.50 which should be raised against the company on the VAT under assessed.	

			2021	N/A	VAT Monitoring	24,908,822.56	The additional assessment of N24,908,822.56 raised on the Company by the FIRS as per the VAT Compliance/Varification exercise for the 2021 Assessment year via report No: MTO/VAT/00019638-0001/2022/12/41 of 9/12/2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N24,908,822.56 which should be raised against the company on the VAT under assessed.	
			2018	NIL	DESK REVIEW NOT SEEN	NIL	NIL	NIL	
		VAT	2019	6,325,169.00	Additional/amended assessment	1,897,550.70	The Capital Allowance of N6,325,169.00 claimed by the	The Company should be made to pay additional tax	

					Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N1,897,550.70 (i.e. CIT of 30% on N6,325,169.00) additional Tax liability.	liability of N1,897,550.00 which should be raised against the company on the excess of relief claimed.	
	2020	6,325,169.00	Additional/amended assessment	1,897,550.70	The Capital Allowance of N6,325,169.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N1,897,550.70 (i.e. CIT of 30% on N6,325,169.00) additional Tax liability.	The Company should be made to pay additional tax liability of N1,897,550.00 which should be raised against the company on the excess of relief claimed.	
	2021	6,325,169.00	Additional/amended assessment	1,897,550.70	The Capital Allowance of N6,325,169.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N1,897,550.70 (i.e. CIT of 30% on N6,325,169.00) additional Tax liability.	The Company should be made to pay additional tax liability of N1,897,550.00 which should be raised against the company on the excess of relief claimed.	

24	DICCEE NIGERIA LIMITED	00229 688- 0001	CIT	2018	N/A	VAT Monitoring	681,672.00	The additional assessment of N681,672.00 raised on the Company by the FIRS as per the VAT Assessment notice for 2018 Assessment year via Revised VAT Re-Assessment No: MTA/GA/BA/VAT/AUD/1778528 dated 7/12/2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N681,672.00 which should be raised against the company on the VAT under assessed.	
			VAT	2019	N/A	VAT Monitoring	1,104,082.00	The additional assessment of N1,104,082.00 raised on the Company by the FIRS as per the VAT Assessment notice for 2019 Assessment year via Revised VAT Re-Assessment No: MTA/GA/BA/VAT/AUD/1778521 dated 7/12/2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,104,082.00 which should be raised against the company on the VAT under assessed.	
				2020	N/A	VAT Monitoring	7,397,593.88	The additional assessment of N7,397,593.88 raised on the Company by the FIRS as per the Compliance monitoring exercise for 2020 Assessment year via Ref No: MTO/VAT/00939820-0001/2021/08/50 dated 6/8/2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N7,397,593.88.00 which should be raised against the company on the VAT under assessed.	
				2021	N/A	VAT Monitoring	22,404,408.42	The additional assessment of N22,404,408.42 raised on the Company by the FIRS as per the VAT Assessment notice for 2021 Assessment year via Report No: EMTO/VAT/00939820-0001/2022/11 dated 29/9/2022, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N22,404,408.42 which should be raised against the company on the VAT under assessed.	

				2018	NIL	Tax Investigation	10,300,746.97	The additional assessment of N10,300,746.97 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on CIT for the 2018 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N10,300,746.97 which should be raised against the company on the CIT under assessed.	
25	INTEGRATED CHEMICAL INDUSTRIES (INTECIL) LIMITED	00019 638-0001	CIT	2019	NIL	Tax Investigation	3,110,121.35	The additional assessment of N3,110,121.35 raised via Document Ref No. FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on CIT for the 2019 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N3,110,121.35 which should be raised against the company on the CIT under assessed.	
				2020	97,508,037.00	Tax Investigation	58,739,890.25	The additional assessment of N29,487,479.15 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on CIT for the 2020 Assessment year were yet to be paid by the company. The Capital Allowance of N97,508,037.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will	The Company should be made to pay additional tax liability of N58,739,890.00 which should be raised against the company on the CIT under assessed.	

					<p>amount to N29,252,411.10 (i.e. CIT of 30% on N97,508,037.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N58,739,890.25 (i.e. N29,487,479.15 plus N29,252,411.10) on the excess of relief claimed.</p>	
	2021	33,516,528.00	DESK Review	25,653,872.82	<p>The additional assessment of N15,598,914.42 raised via Document Ref No.MTO/ENU/RPP/00783447/2021/16 dated 1/9/2021 on the Company by the FIRS as per Desk Review Exercise on CIT for the 2021 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N33,516,528.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N10,054,958.40 (i.e. CIT of 30% on N33,516,528.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N25,653,872.82 (i.e. N15,598,914.42 plus</p>	<p>The Company should be made to pay additional tax liability of N25,653,872.82 which should be raised against the company on the CIT under assessed.</p>

					N10,054,958.40) on the excess of relief claimed.		
		2018	NIL	Tax Investigation	20,773.20	The additional assessment of N20,773.20 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on EDT for the 2018 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N20,773.20 which should be raised against the company on the EDT under assessed.
	VAT	2019	NIL	Tax Investigation	1,087,776.16	The additional assessment of N1,087,776.16 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on EDT for the 2019 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,087,776.16 which should be raised against the company on the EDT under assessed.
		2020	NIL	Tax Investigation	1,288,233.81	The additional assessment of N1,288,233.81 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on EDT for the 2020 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,288,233.81 which should be raised against the company on the EDT under assessed.
		2021	YES	DESK Review	NIL	NIL	NIL

				2018	NIL	Tax Investigation	1,225,500.00	The additional assessment of N1,225,500.00 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on WHT for the 2018 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,225,500.00 which should be raised against the company on the WHT under assessed.	
26	ENVOY OIL INDUSTRIES LTD.	00939 820-0001	CIT	2020	NIL	Tax Investigation	697,567.50	The additional assessment of N697,567.50 raised via Document Ref No.FIRS/TID/SD/00793447-0001 dated 17/11/2020 on the Company by the FIRS as per Tax Investigation Exercise on WHT for the 2020 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N697,567.50 which should be raised against the company on the WHT under assessed.	
				2021	YES	DESK Review	NIL	NIL	NIL	
				2018	101,530,434.00	Tax Audit	41,224,669.20	The additional assessment of N10,765,539.00 raised via Document Ref No.FIRS/MTA/TA/EN/01332678-0001/03 dated 11/11/2020 on the Company by the FIRS as per Tax Audit Exercise on CIT for the 2018 Assessment year were yet to be paid by the company. In the Audited account the company claimed Capital Allowance of	The Company should be made to pay additional tax liability of N41,224,669.20 which should be raised against the company on the CIT under assessed.	

							N101,530,434.00 without evidence of CAF, hence, this sum should be subjected to tax which will amount to N30,459,130.20 (I.E CIT of 30% of N101,530,434.00) , therefore, the company total tax liability on CIT for the YOA IS N41,224,669.20 (i.e N10,765,539.00 plus N30,459,130.20)		
		2019	NIL	Tax Audit	8,269,987.00		The additional assessment of N8,269,987.00 raised via Document Ref No .FIRS/MTA/TA/EN/01332678-0001/03 dated 11/11/2020 on the Company by the FIRS as per Tax Audit Exercise on CIT for the 2019 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N8,269,987.00 which should be raised against the company on the CIT under assessed.	
	VAT	2020	98,875,974.00	Self Assessment	29,662,792.20		The Capital Allowance of N98,875,974.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N29,662,792.20 (i.e. CIT of 30% on N98,875,974.00) additional Tax liability.	The Company should be made to pay additional tax liability of N29,662,792.20 in the absent of CAFA	

			2021	62,892.00	Promax used	9,452,761.60	<p>The Capital Allowance of N62,892.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N18,867.60 (i.e. CIT of 30% on N62,892.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N9,452,761.60 (i.e. N62,892.00 plus N9,433,894.00 as CIT computed using TaxPromax which evidence of payment was not seen).</p>	The Company should be made to pay additional tax liability of N9,452,761.60 which should be raised against the company on the CIT under assessed.	
			2018	NIL	Tax Audit	1,166,163.00	The additional assessment of N1,166,163.00 raised via Document Ref No.FIRS/MTA/TA/EN/01332678-0001/03 dated 11/11/2020 on the Company by the FIRS as per Tax Audit Exercise on VAT for the 2018 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N1,166,163.00 which should be raised against the company on theVAT under assessed.	
			2018	101,530,434.00	Tax Audit	1,294,580.00	The additional assessment of N1,294,580.00 raised via Document Ref No.FIRS/MTA/TA/EN/01332678-0001/03 dated 11/11/2020 on the Company by the FIRS as per Tax Audit Exercise on EDT for the 2018 Assessment year were yet to be	The Company should be made to pay additional tax liability of N1,294,580.00 which should be raised against the company on the EDT under assessed.	

								paid by the company.		
27	AKIOTA WORKS LTD	00793 447- 0001	CIT	2019	NIL	Tax Audit	867,347.00	The additional assessment of N867,347.00 raised via Document Ref No.FIRS/MTA/TA/EN/01332678-0001/03 dated 11/11/2020 on the Company by the FIRS as per Tax Audit Exercise on EDT for the 2019 Assessment year were yet to be paid by the company.	The Company should be made to pay additional tax liability of N867,347.00 which should be raised against the company on the EDT under assessed.	
				2020	N/A	Self Assessment	NIL	NIL	NIL	

				2021	N/A	Promax used	NIL	NIL	NIL	
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			2018	8,974,122.00	DESK REVIEW	6,961,440.60	<p>The additional assessment of N4,269,204.00 raised on the Company by the FIRS as per Tax Demand Notice on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/CIT/239 dated 29/10/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N8,974,122.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N2,692,236.6 (i.e. CIT of 30% on N8,974,122.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N6,961,440.60 (i.e. N4,269,204.00 plus N2,692,236.6) on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N6,961,440.60 (i.e. N4,269,204.00 plus N2,692,236.6) which should be raised against the company on the excess of relief claimed.</p>	
	EDT		2019	6,098,904.00	ADDITIONAL/AMEN DED	5,291,463.20	<p>The additional assessment of N3,461,792.00 raised on the Company by the FIRS as per Tax Demand Notice on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/BA/CIT/241 dated 28/20/2021 were yet to be paid by the company.</p>	<p>The Company should be made to pay additional tax liability of N5,291,463.2 (i.e. N1,829,671.2 plus N3,461,792.00) as a result of Additional Assessment on CIT for the 2019 Assessment year.</p>	

					<p>The Capital Allowance of N6,098,904.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N1,829,671.2 (i.e. CIT of 30% on N6,098,904.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N5,291,463.2 (i.e. N1,829,671.2 plus N3,461,792.00) on the excess of relief claimed.</p>	
	2020	31,908,212.00	ADDITIONAL/AMEN DED	14,097,402.60	<p>The additional assessment of N4,524,939.00 raised on the Company by the FIRS as per Additional Assessment on CIT for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/236 dated 29/10/2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N31,908,212.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and</p>	<p>The Company should be made to pay additional tax liability of N14,097,402.6 (i.e. N4,524,939.00 plus N9,572,463.6) as a result of Additional Assessment on CIT for the 2020 Assessment year.</p>

					<p>hence, this sum should be subjected to tax which will amount to N9,572,463.6 (i.e. CIT of 30% on N31,908,212.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N14,097,402.6 (i.e. N4,524,939.00 plus N9,572,463.6) on the excess of relief claimed.</p>			
			2021	9,194,816.00	NIL	NIL	<p>The additional assessment was not raised on the Company by the FIRS as per Tax Demand Notice on CIT for the 2021 YOA.</p> <p>The Capital Allowance of N9,194,816.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N2,758,444.8 (i.e. CIT of 30% on N9,194,816.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of the said relief claimed.</p>	<p>he Company should be made to pay additional tax liability of the said relief claimed for 2021 Assessment year.</p>
			2018	N/A	NIL	NIL	<p>No VAT Monitoring exercise was carried out in the period under review.</p>	<p>The reason(s) why the Company failed to file monthly Tax returns in 2018 YOA and also failure to carry out VAT monitoring exercise</p>

									by the FIRS should be explained by the EC-FIRS.	
			WHT	2019	N/A	NIL	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
				2020	N/A	NIL	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
				2021	N/A	NIL	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
28	CHUMA STORES NIG LTD	01332 678-0001	CIT	2018	NIL	DESK REVIEW	193,479.00	The additional assessment of N193,479.00 raised on the Company by the FIRS as per the EDT assessment notice for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/238 dated 26/10/ 2021, were yet to be paid by the company.	The Company should be made to pay the additional assessment of N193,479.00 raised on the Company by the FIRS for the 2018 Assessment year.	
				2019	NIL	ADDITIONAL/AMEN DED	230,786.00	The additional assessment of N230,786.00 raised on the Company by the FIRS as per Assessment Notice on EDT for the 2019 Assessment year via Assessment No:	The Company should be made to pay the additional assessment of N230,786.00 raised on the Company by the FIRS as per Assessment Notice for the 2019	

					EMTO/GA/BA/ET/237 of 26/11/2021, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	Assessment year.	
		2020	NIL	ADDITIONAL/AMENDED	301,662.00	The additional assessment of N301,662.00 raised on the Company by the FIRS as per Additional Assessment on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/236 dated 29/10/2021, were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N301,662.00 raised on the Company by the FIRS as per Additional Assessment on Education Tax due for the 2020 Assessment year.
		2018	NIL	NIL	NIL	NIL	NIL
	VAT	2019	3,267,559.00	ADDITIONAL/AMENDED	9,359,491.70	The additional assessment of N8,379,224.00 raised on the Company by the FIRS as per Addityional Assessment on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/BA/AUD/267 dated 18/11/2021, were yet to be paid by the company. The Capital Allowance of N3,267,559.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate	The Company should be made to pay additional tax liability of N9,359,491.7 (i.e. N980,267.00 plus N8,379,224.00) on the excess of relief claimed.

						<p>Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N980,267 (i.e. CIT of 30% on N3,267,559.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N9,359,491.7 (i.e. N980,267.00 plus N8,379,224.00) on the excess of relief claimed.</p>	
EDT	2020	3,267,559.00	ADDITIONAL/AMENDED	48,269,077.70	<p>The additional assessment of N47,288,810.00.00 raised on the Company by the FIRS as per Additional Assessment on CIT for the 2020 Assessment year via Assessment No: EMT0/GA/BA/AUD/268 dated 18/04/2020, were yet to be paid by the company.</p> <p>The Capital Allowance of N3,267,559.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N980,267.7 (i.e. CIT of 30% on N3,267,559.00.00) additional Tax liability.</p> <p>In total, the Company should be</p>	<p>The Company should be made to pay additional tax liability of N48,269,077.7 (i.e. N980,267.7 plus N47,288,810) on the excess of relief claimed.</p>	

						made to pay additional tax liability of N48,269,077.7 (i.e. N980,267.7 plus N47,288,810) on the excess of relief claimed.		
			2021	3,267,559.00	NIL	NIL	NO assessment was raised on the Company by the FIRS on CIT for the 2021 Assessment year The Capital Allowance of N3,267,559.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment. the Company should be made to pay additional tax liability on the excess of relief claimed.	The Company should be made to pay additional tax liability on the excess of relief claimed.
			2018	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.
			2019	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.

29	ELSON CONSTRUC TION COMPANY LIMITED	10839 029- 0001	CIT	2020	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.
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				2021	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
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				2018	NIL	NIL	NIL	NIL	NIL	
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			2019	NIL	AUDIT ASSESSMENT	558,615.00	<p>The Audit assessment of N558,615.00 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/263 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N558,615.00 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2019 Assessment year.	
	VAT		2020	NIL	AUDIT ASSESSMENT	3,152,587.00	<p>The additional assessment of N3,152,587.00 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2020 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/264, dated 18/11/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N3,152,587.00 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2020 Assessment year.	
			2019	2,552,365.00	ADDITIONAL/AMEN DED	3,305,711.50	<p>The additional assessment of N2,540,002.00 raised on the Company by the FIRS as per Tax Additional Assessment on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/BA/AUD/275 of</p>	The Company should be made to pay additional tax liability of N3,305,711.50 (i.e. N765,709.50 plus N2,540,002.00) on the excess of relief claimed.	

					<p>18/11/2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N2,552,365.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N765,709.50 (i.e. CIT of 30% on N2,552,365.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N3,305,711.50 (i.e. N765,709.50 plus N2,540,002.00) on the excess of relief claimed.</p>	
	2020	1,090,431.00	ADDITIONAL/AMENDED	3,421,726.30	<p>The additional assessment of N3,094,597.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2020 Assessment year via Assessment No: EMTO/GA/BA/AUD/276, of 18/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N1,090,431.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of</p>	<p>The Company should be made to pay additional tax liability of N3,421,726.30 (i.e. N327,129.30 plus N3,094,597.00) on the excess of relief claimed.</p>

							<p>Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N327,129.3 (i.e. CIT of 30% on N1,090,431.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N3,421,726.30 (i.e. N327,129.30 plus N3,094,597.00) on the excess of relief claimed.</p>	
		2018	N/A	NIL	NIL	NIL		<p>The Company should be made to pay the additional tax liability of N707,572.32 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019 Accounts via a letter with Reference No: FIRS/LTAPH/2021/00194888-0001, dated 10th August, 2021.</p>
	EDT	2018	NIL	NIL	NIL	NIL	NIL	

				2019	NIL	ADDITIONAL/AMEN DED	220,474.82	<p>The additional assessment of N220,474.82 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/271, of 18/11/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N220,474.82 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2019 Assessment year.	
				2020	NIL	ADDITIONAL/AMEN DED	267,209.56	<p>The additional assessment of N267,209.56 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/272, of 18/11/2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N267,209.56 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2020 Assessment year.	
30	COPEN SERVICES LTD.	00087 201- 0001	CIT		15,962,469.00	ADDITIONAL/AMEN DED	11,522,003.70	<p>The additional assessment of N6,733,263.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/AUD/117, dated 22/12/2020 were yet to be paid by the company.</p> <p>The Capital Allowance of N15,962,469.00 claimed by the Company in 2018 YOA was</p>	The Company should be made to pay additional tax liability of N11,522,003.70(i.e. N4,788,740.70 plus N6,733,263.00 on the excess of relief claimed.	

							<p>without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N4,788,740.70 (i.e. CIT of 30% on N15,962,469.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N11,522,003.70(i.e. N4,788,740.70 plus N6,733,263.00 on the excess of relief claimed.</p>		
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			2019	63,129,340.00	DESK REVIEW WAS CARRIED OUT	21,396,693.00	<p>The additional assessment of N2,457,891.00 raised on the Company by the FIRS as per the Audit Assessment on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/BA/AUD/118AD, of 22/12/2020 were yet to be paid by the company.</p> <p>The Capital Allowance of N63,129,340.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N18,938,802.00 (i.e. CIT of 30% on N63,129,340.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N21,396,693.00(i.e.N18,938,802.00 plus N2,457,891.00 on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N21,396,693.00 (i.e.N18,938,802.00 plus N2,457,891.00) on the excess of relief claimed.</p>
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			2020	55,043,557.00	SELF ASSESSMENT	20,097,951.15	<p>The Self assessment of N3,584,884.05 was raised by the taxpayer as per self assessment on CIT for the 2020 Assessment year via Assessment No: ENU/C/SA/CIT/244, of 26/05/2020 were yet to be paid by the company.</p> <p>The Capital Allowance of N55,043,557.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N16,513,067.10 (i.e. CIT of 30% on N55,043,557.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N20,097,951.15 (i.e.N16,513,067.10 plus N3,584,884.05 on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N20,097,951.15 (i.e.N16,513,067.10 plus N3,584,884.05) on the excess of relief claimed.</p>
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			2021	78,858,694.00	SELF ASSESSMENT	26,342,418.20	<p>The Self assessment of N2,684,810.07 was raised by the taxpayer as per self assessment on CIT for the 2021 Assessment year via Assessment No: EMTO/SA/CIT/63 dated 19/08/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N78,858,694.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N23,657,608.2 (i.e. CIT of 30% on N78,858,694.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N26,342,418.2 (i.e. N23,657,608.2 plus N2,684,810.07 on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N26,342,418.2 (i.e. N23,657,608.2 plus N2,684,810.07 on the excess of relief claimed.	
	VAT		2018	NIL	DESK REVIEW	448,884.58	The additional assessment of N448,884.58 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2018 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/120AD, were yet to be paid by the company.	The Company should be made to pay the additional assessment of N448,884.58 raised on the Company by the FIRS as Audit Assessment on Education Tax due for the 2018 Assessment year.	

					The Company should be made to pay additional tax liability as reflected above.				
				2019	NIL	DESK REVIEW	163,859.70	The additional assessment of N163,859.70 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2019 Assessment year via Assessment No: EMTO/GA/BA/ET/AUD/21AD were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N163,859.70 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2019 Assessment year.
				2020	NIL	SELF ASSESSMENT	1,172,139.48	The additional assessment of N1,172,139.48 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: ENU/C/SA/EDT/226, dated 26/05/2020 were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N1,172,139.48 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year.
				2021	NIL	SELF ASSESSMENT	1,942,320.00	The additional assessment of N1,942,320.00 raised on the Company by the FIRS as per SELF Assessment due for the 2021 Assessment year were yet to be paid by the company. The Company should be made to pay the Tax liability due as	The Company should be made to pay the Tax liability of N1,942,320.00 raised by taxpayer as per self Assessment due for the 2021 Assessment year.

						reflected above.	
	EDT	2018	N/A	DEMAND NOTICE	292,508.00	The amount of N292,508.00 (Tax Due - N226,750; Penalty @ 10% - N22,675.00; and Interest @ 19% - N43,082.50) raised in Demand Notice with Reference Number: EMTO/GA/BA/WHT/AUD/30AD dated 22/12/2020 against the Company by the FIRS for failure to pay WHTax on the due date, were yet to be paid by the company. The Company should be made to pay the tax liability as reflected above.	The Company should be made to pay the sum of N292,508.00 raised in the Demand Notice with Reference number: EMTO/GA/BA/WHT/AUD/30AD dated 22/12/2020 against the Company by the FIRS for failure to pay WHTax on the due date.
		2019	N/A	NO TAX AUDIT WAS CARRIED OUT	NIL	NIL	Tax Audit must be conducted on the Company to ascertain the WHTax payable during the period under review.
		2020	N/A	NO TAX AUDIT WAS CARRIED OUT	NIL	NIL	Tax Audit must be conducted on the Company to ascertain the WHTax payable during the period under review.

				2021	N/A	NO TAX AUDIT WAS CARRIED OUT	NIL	NIL	Tax Audit must be conducted on the Company to ascertain the WHTax payable during the period under review.	
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		2018	2,336,634.00	TAX AUDIT WAS CARRIED OUT	1,837,966.20	<p>The additional assessment of N1,136,976.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/CIT/AUD/284, dated 18/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N2,336,634.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N700,990.2 (i.e. CIT of 30% on N2,336,634.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,837,966.20 (i.e. N700,990.20 plus N1,136,976.00 on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N1,837,966.20 (i.e. N700,990.20 plus N1,136,976.00) on the excess of relief claimed.	
VAT		2019	2,380,157.00	TAX AUDIT WAS CARRIED OUT	2,602,591.10	<p>The additional assessment of N1,888,544.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2019 Assessment year via Assessment No: EMTO/GA/BA/CIT/AUD/285, dated 18/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of</p>	The Company should be made to pay additional tax liability of N2,602,591.10 (i.e. N714,047.10 plus N1,888,544.00) on the excess of relief claimed.	

						<p>N2,380,157.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N714,047.10 (i.e. CIT of 30% on N2,380,157.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N2,602,591.10 (i.e. N714,047.10 plus N1,888,544.00 on the excess of relief claimed.</p>	
						<p>The Self assessment of N7,190,428.09 was raised by the taxpayer as per self Assessment on CIT for the 2021 Assessment year via self Assessment No: EMTO/SA/62, dated 19/08/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N3,344,442.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N1,003,332.60 (i.e. CIT</p>	<p>The Company should be made to pay tax liability of N8,193,760.69 (i.e. N1,003,332.60 plus N7,190,428.09) on the excess of relief claimed.</p>
	EDT	2021	3,344,442.00	SELF ASSESSMENT	8,193,760.09		

					of 30% on N3,344,442.00 additional Tax liability.	
					In total, the Company should be made to pay additional tax liability of N8,193,760.69 (i.e. N1,003,332.60 plus N7,190,428.09 on the excess of relief claimed.	
	2018	NIL	TAX AUDIT WAS CARRIED OUT	77,340.00	<p>The additional assessment of N77,340.00 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2018 Assessment year via Assessment No: EMT0/GA/BA/ET/AUD/280, dated 18/11/2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N77,340.00 raised on the Company by the FIRS as per Audit Assessment conducted on Education Tax due for the 2018 Assessment year.
	2019	NIL	TAX AUDIT WAS CARRIED OUT	127,444.00	<p>The additional assessment of N127,444.00 raised on the Company by the FIRS as per Audit Assessment on Education Tax due for the 2018 Assessment year via Assessment No: EMT0/GA/BA/ET/AUD/281, dated 18/11/2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N127,444.00 raised on the Company by the FIRS as per Audit Assessment conducted on Education Tax due for the 2018 Assessment year.

32	VADIS LIMITED	05048 315- 0001	CIT	2021	NIL	SELF ASSESSMENT	538,628.26	<p>The Self assessment of N538,628.26 was raised by the taxpayer as per self assessment on EDT due for the 2021 Assessment year via Self Assessment No: EMTO/SA/EDT/02, dated 19/08/2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the Self assessment of N538,628.26 raised on Assessment conducted on Education Tax due for the 2021 Assessment year.</p>
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			2018	606,026.00	DESK REVIEW	3,097,920.80	<p>The additional assessment of N2,916113.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/AUD/280, dated 18/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N606,026.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N181,807.80 (i.e. CIT of 30% on N606,026.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N3,097,920.80 (i.e.N181,807.80 plus N2,916113.00 on the excess of relief claimed.</p>	<p>The Company should be made to pay tax liability of N3,097,920.80 (i.e.N181,807.80 plus N2,916113.00) on the excess of relief claimed.</p>	
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			2019	2,017,800.00	DESK REVIEW	2,106,307.00	<p>The additional assessment of N1,500,967.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/AUD/281, dated 18/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N2,017,800.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N605,340.00 (i.e. CIT of 30% on N2,017,800.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N2,106,307.00 (i.e. N605,340.00 plus N1,500,967.00 on the excess of relief claimed.</p>	<p>The Company should be made to pay tax liability of N2,106,307.00 (i.e. N605,340.00 plus N1,500,967.00) on the excess of relief claimed.</p>	
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			2020	1,579,800.00	NIL	NIL	NIL	NIL	
		EDT	2021	2,536,273.00	DESK REVIEW	4,444,315.84	<p>The Self assessment notice of N3,683,433.94 raised by the taxpayer as per self Assessment on CIT for the 2021 Assessment year via self Assessment No: EMTO/SA/03, dated 05/01/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N2,536,273.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate</p>	<p>The Company should be made to pay tax liability of N4,444,315.84 (i.e.N760,881.90 plus N3,683,433.94) on the excess of relief claimed.</p>	

					<p>Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N760,881.90 (i.e. CIT of 30% on N2,536,273.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N4,444,315.84 (i.e.N760,881.90 plus N3,683,433.94 on the excess of relief claimed.</p>		
	2018	NIL	ADDITIONAL/AMENDED	1,724,082.00	The additional assessment of N1,724,082.00 raised on the Company by the FIRS as per the Tax Audit conducted on Company Income Tax due for the 2018 Assessment year via Assessment No: ICSA 207AD, dated 09/05/2019, were yet to be paid by the company.	The Company should be made to pay additional tax liability	
	2019	20,126,877.00	ADDITIONAL/AMENDED	NIL	<p>NO additional assessment was raised that YOA</p> <p>The Capital Allowance of N20,126,877.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment.</p>	The Company should be made to pay the outstanding Liability	

			2021	20,755,412.00	SELF ASSESSMENT	10,790,448.60	<p>The Self Assessment of N4,563,825.00 was raised by the taxpayer on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/SA/281, dated 18/11/2021 were yet to be paid by the company.</p> <p>The Capital Allowance of N20,755,412.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N6,226,623.60 (i.e. CIT of 30% on N20,755,412.00 additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N10,790,448.60 (i.e. N6,226,623.60 plus N4,563,825.00 on the excess of relief claimed.</p>	<p>The Company should be made to pay tax liability of N10,790,448.60 (i.e. N6,226,623.60 plus N4,563,825.00) on the excess of relief claimed.</p>	
			WHT	2018	NIL	NIL	NIL	NIL	

				2019	NIL	ASSESSMENT NOTICE	1,080,000.00	The sum of N1,080,000.00 raised as additional assessment on Education Tax by the FIRS via Assessment No: ICBA/1ET, dated 15/01/2020, were yet to be paid by the company.	The FIRS should conduct a VAT monitoring exercise for the period under review to ascertain the VAT liability for the period.	
				2020	NIL	TAX AUDIT WAS CONDUCTED	NIL	NIL	NIL	
				2021	NIL	NIL	NIL	NIL	NIL	
33	ZIMCHEZ LIMITED	18581 285-0001	CIT	2018	72,945,099.00		N38,893,994	DEMAND NOTICE:FIRS/MTO ENU/DN/30 =N14,850,650 B)N24,073,344. (REF: EMTO/GA/BA/CIT/AUD/91nd	The Company should be made to pay tax liability of N38,893,994.00 on the excess of relief claimed.	

				2019	74,518,081.00		N27,160,391	ADDITIONAL/AMENDED ASSESSMENT = N27,160,391(REF:EMTO/GA/BA/C IT/AD/90HD	The Company should be made to pay tax liability of N27,160,391.00 on the excess of relief claimed.	
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			2020	175,991,636.0 0	NIL		NIL	NIL	
		EDT	2021	146,281,935.0 0		N7,936,162	ADD/AMEND ASSESSMENT= N7,936,162(REF:EMTO/GA/BA/CIT /04 Ad	The Company should be made to pay tax liability of N7,936,162.00 on the excess of relief claimed.	

				2018	NIL	N/A	N/A	N/A	N/A	
				2021	NIL		529,078.00	ADD/AMEND ASSESSMENT N529,078(EMTO/BA/GA/ET/04 Ad	The Company should be made to pay tax liability of N529,078.00 on the excess of relief claimed.	

34	UCIKO NIGERIA LIMITED	00428 565- 0001	CIT	2018	N/A	N/A	N/A	N/A	N/A	
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				2021	N/A		662,050.00	ADD/AMEND ASSESSMENT N662,050.00(EMTO/BA/GA/WHT/ 02	The Company should be made to pay tax liability of N662,050.00 on the excess of relief claimed.	
				2018	71,250,000.00	ADDITIONAL ASSESSMENT	N3,749,579	ADD/AMEND ASS N1,851,156(REF:EMTO/GA/BA/AU D/273, B) ADD/AMEND ASS N1,898,423(REF: EMTO/GA/BA/AUD/272	The Company should be made to pay tax liability of N3,749,579.00 on the excess of relief claimed.	

				2019	542,932,485.05	ADDITIONAL ASSESSMENT	N1,911,656	ADD/AMEND ASS N1,911,656(REF:EMTO/GA/BA/AU D/274	The Company should be made to pay tax liability of N1,911,656.00 on the excess of relief claimed.	
35	FINCA MICROFIN ANCE BANK LIMITED	17814 709- 0001	CIT	2018	N/A	N/A	N/A	N/A	N/A	
				2021	N/A	N/A	1,840,000.00	PENALTY FOR NON-FILING OF VAT 2019 FEB- MAY 2020	The Company should be made to pay tax liability of N1,840,000.00 on the excess of relief claimed.	

			2018	N/A	N/A	370,292.70	ADD/AMEND N370,292.70 (REF: EMTO/GA/BA/ET/AUD/269)	The Company should be made to pay tax liability of N370,292.70 on the excess of relief claimed.	
	EDT		2019	N/A	N/A	386,275.08	ADD/AMEND N386,275.08 (REF: EMTO/GA/BA/ET/AUD/270)	The Company should be made to pay tax liability of N386,275.08 on the excess of relief claimed.	
			2018	973,313.00	DESK REVIEW	589,756.90	<p>The additional assessment of N297,763.00 raised on the Company by the FIRS as per Additional Assessment on CIT for the 2018 Assessment year via Assessment No: EMTO/GA/BA/AUD/93AD were yet to be paid by the company.</p> <p>The Capital Allowance of N973,313.00 claimed by the Company in 2018 YOA was</p>	The Company should be made to pay additional tax liability of N589,756.90 (i.e.N297,763.00 plus N291,993.90 on the excess of relief claimed. on the excess of relief claimed.	

					<p>without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N291,993.90 (i.e. CIT of 30% on N973,313.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N589,756.90 (i.e.N297,763.00 plus N291,993.90 on the excess of relief claimed.</p>	
2019	973,313.00	DESK REVIEW	865,433.90	<p>The additional assessment of N573,440.00 raised on the Company by the FIRS as per Additional Assessment on CIT for the 2019 Assessment year via Assessment No: EMT0/GA/BA/AUD/94 were yet to be paid by the company.</p> <p>The Capital Allowance of N973,313.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N291,993.90 (i.e. CIT of 30% on N973,313.00) additional Tax liability.</p>	<p>The Company should be made to pay additional tax liability of N865,433.90 (i.e.N573,440.00 plus N291,993.90 on the excess of relief claimed.</p>	

36	E.O.NNABU GWU& SONS	00396 781- 0001	CIT	2021	723,438.00	DESK REVIEW	NIL	The Capital Allowance of N723,438.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N217,031.40 (i.e. CIT of 30% on N723,438.00) additional Tax liability.	The Company should be made to pay additional tax liability of N217,031.40 (i.e. CIT of 30% on N723,438.00) on the excess of relief claimed.	
				2018	973,313.00	DESK REVIEW	N/A	N/A	N/A	
				2021	723,438.00	DESK REVIEW	100,000.00	VAT RE-ASSESSMENT(REF: EMTO/VAT/88/2021	The Company should be made to pay additional tax liability of N100,000.00 on the excess of relief claimed.	
				2018	30,934,750.00	N/A	N/A	N/A	N/A	
			EDT	2018	N/A	N/A	N/A	N/A	N/A	
				2020	N/A	VAT RE-ASSESSMENT	19,101,933.00	VAT RE-ASSESSMENT NOTICE- REF: EMTO/VAT/85/2020	The Company should be made to pay additional tax liability of N19,101,933.00 on the excess of relief claimed.	
			WHT	2018	N/A	ADD/AMEND 2) DEMAND NOTICE	7,327,911.00	ADD/AMEND N7,162,404.00(REF:EMTO/GA/BA/AUD/176AD B}DEMAND NOTICE N 165,507.00(EMTO/GA/BA/WHT/2 2AD}	The Company should be made to pay tax liability of N7,327,911.00 on the excess of relief claimed.	

				2019	N/A	ADD/AMEND	3,736,118.00	ADD/AMEND N3,736,118.00(REF:EMTO/GA/BA/ AUD/177AD	The Company should be made to pay tax liability of N3,736,118.00 on the excess of relief claimed.	
37	GOD BLESS EZENWATA NIG LTD	01330 806- 0001	CIT	2018	40,252,732.00	ADD/AMEND NOTICE	19,588,223.60	<p>The additional assessment of N7,512,404.00 raised on the Company by the FIRS as per Additional Assessment on CIT for the 2018 Assessment year via Assessment No: MTO/GA/BA/GT/AUD/176AD were yet to be paid by the company.</p> <p>The Capital Allowance of N40,252,732.00 claimed by the Company in 2018YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N12,075,819.60 (i.e. CIT of 30% on N40,252,732.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N19,588,223.60 (i.e.N7,512,404.00 plus N12,075,819.60 on the excess of relief claimed.</p>	The Company should be made to pay tax liability of N19,588,223.60 (i.e.N7,512,404.00 plus N12,075,819.60 on the excess of relief claimed.	
				2019	37,030,799.00	ADD/AMEND NOTICE	14,870,357.70	The additional assessment of N3,761,118.00 raised on the Company by the FIRS as per Additional Assessment on CIT for	The Company should be made to pay tax liability of N14,870,357.70 (i.e.N3,761,118.00 plus	

						<p>Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N69,752,617.50 (i.e. CIT of 30% on N226,324,245.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N69,752,617.50 (i.e.N1,855,344.00 plus N67,897,273.50 on the excess of relief claimed.</p>		
			2021	47,935,814.00	ADD/AMEND NOTICE	14,580,054.20	<p>The additional assessment of N199,310.00 raised on the Company by the FIRS as per Additional Assessment on CIT for the 2021 Assessment year via Assessment No: EMT0/GA/ET/11AD were yet to be paid by the company.</p> <p>The Capital Allowance of N47,935,814.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N14,380,744.20 (i.e.</p>	<p>The Company should be made to pay tax liability of N14,580,054.20 (i.e.N199,310.00 plus N14,380,744.20 on the excess of relief claimed.</p>

						<p>CIT of 30% on N47,935,814.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N14,580,054.20 (i.e.N199,310.00 plus N14,380,744.20 on the excess of relief claimed.</p>	
	EDT	2018	N/A	VAT RE-ASSESSMENT	102,250.58	RE-ASSESSMENT N102,250.58 (EMTO/VAT/93/2021)	The Company should be made to pay tax liability of N102,250.58 on the excess of relief claimed.
		2019	N/A	VAT RE-ASSESSMENT	34,508.65	RE-ASSESSMENT N102,250.58 (EMTO/VAT/94/2021)	The Company should be made to pay tax liability of N34,508.65 on the excess of relief claimed.

38	DOFAS TECHNICAL NIG LTD	01146 266- 0001	CIT	2018	N/A	N/A	N/A	N/A	N/A	
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			2020	ADD/AMEND NOTICE	199,310.00	ADD/AMEND N199,310.00 (REF:EMTO/GA/ET/06AD	The Company should be made to pay tax liability of N199,310.00 on the excess of relief claimed.	
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				2018	N/A	TAX AUDIT	1,654,870.00	REF: FIRS/MTA/EN/LOI/01247672-0001/4	The Company should be made to pay tax liability of N1,654,870.00 on the excess of relief claimed.	
				2019	20,694,237.00	TAX AUDIT	16,715,672.10	<p>The additional assessment of N10,507,401.00 raised on the Company by the FIRS as per Audit Assessment on CIT for the 2019 Assessment year via Assessment No: FIRS/MTA/EN/LOI/01247672-0001/4 were yet to be paid by the company.</p> <p>The Capital Allowance of N20,694,237.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA)</p>	The Company should be made to pay tax liability of N16,715,672.10 (i.e.N10,507,401.00 plus N6,208,271.10 on the excess of relief claimed.	

								<p>from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N6,208,271.10 (i.e. CIT of 30% on N20,694,237.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N16,715,672.10 (i.e. N10,507,401.00 plus N6,208,271.10 on the excess of relief claimed.</p>	
			VAT	2020	18,922,219.00	N/A	5,676,665.70	<p>The Capital Allowance of N18,922,219.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N5,676,665.70 (i.e. CIT of 30% on N18,922,219.00) additional Tax liability.</p>	The Company should be made to pay tax liability of NN5,676,665.70 on the excess of relief claimed.
				2021	15,038,769.00	N/A	N/A	N/A	N/A
39	STEFANUTII STOCK HAPEL LTD	09624 826-0001	CIT	2018	N/A	TAX AUDIT VAT RE-ASSESSMENT	2,349,948.79	REF: FIRS/MTA/EN/LOI/01247672-0001/4 - N2,120,698.00 B) VAT RE-ASS REF:EMTO/VAT/19/22 N229,250.79	The Company should be made to pay tax liability of N2,349,948.79 on the excess of relief claimed.

			VAT	2018	N/A	N/A	N/A	N/A	N/A	
				2019	N/A	TAX AUDIT	872,369.00	REF: FIRS/MTA/EN/LOI/01247672-0001/4	The Company should be made to pay tax liability of N872,369.00 on the excess of relief claimed.	
			WHT	2018	N/A	N/A	N/A	N/A	N/A	
				2019	N/A	TAX AUDIT	109,902.00	REF: FIRS/MTA/EN/LOI/01247672-0001/4	The Company should be made to pay tax liability of N109,902.00 on the excess of relief claimed.	
40	SUNCHI INTERGRAT ED FARMS LTD	05287 950- 0001	CIT	2018	487,778,381.0 0	N/A	N/A	N/A	N/A	

				2018	N/A	TAX AUDIT	3,792,047.98	FIRS/MTA/TA/01758972-0001/20	The Company should be made to pay tax liability of N3,792,047.98 on the excess of relief claimed.	
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			2018	23,811,616.00	TAX REVIEW	2,557,811.00	FIRS/MTA/EN/LOI/01493170-000/7- N307,044 B)ADD/AMEND ASSESS-N2,128,238- REF:EMTO/GA/BA/ET/48AD) c)ADD/AMEND N122,529 REF:EMTO/GA/BA/48 AD	The Company should be made to pay tax liability of N2,557,811.00 on the excess of relief claimed.	
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			2019	N5,216,250	TAX REVIEW	2,818,414.00	FIRS/MTA/EN/LOI/01493170-000/7 - N1,557,757 B)ADD/AMEND ASSESS- N1260,657- REF: EMTO/GA/BA/ET/49AD)	The Company should be made to pay tax liability of N2,818,414.00 on the excess of relief claimed.	
	VAT		2020	NOT SEEN	TAX REVIEW	N3,308,538	FIRS/MTA/EN/LOI/01493170-000/7- N3,308,538	The Company should be made to pay tax liability of N3,308,538.00 on the excess of relief claimed.	
			2018	N/A	TAX REVIEW	461,345.00	FIRS/MTA/EN/LOI/01493170-000/7 - N61,921 B)ADD/AMEND ASSESS- N199,712- REF: EMTO/GA/BA/ET/44AD) C) N199,712 REF:EMTO/GA/ET/45AD	The Company should be made to pay tax liability of N461,345.00 on the excess of relief claimed.	
	EDT		2019	N/A	TAX REVIEW	307,998.00	FIRS/MTA/EN/LOI/01493170-000/7 - N64,892 B) B)ADD/AMEND ASSESS- N243,106- REF: EMTO/GA/BA/ET/44AD)	The Company should be made to pay tax liability of N307,998.00 on the excess of relief claimed.	

				2020	N/A	TAX REVIEW	N228,136	FIRS/MTA/EN/LOI/01493170-000/7 - N228,136	The Company should be made to pay tax liability of N228,136.00 on the excess of relief claimed.	
41	ALBERTINA NIGERIA LTD	01075 183-0001	CIT							

			VAT						
			EDT						
			WHT						
42	UNION AUTO PARTS MANUFAC TURING COMPANY	01758 972- 0001	CIT						
			EDT						
43	TRANS- GLOBE PHARMACY CO.LTD	01493 170- 0001	CIT						

AKWA LTO

REVIEW OF TAX FILES

During the review of the sampled tax files, the following observations and recommendations stated in column J and k respectively are forwarded for your necessary attention. kindly provide your responses accordingly.

GENERAL OBSERVATIONS - AWKA LTO

A	B	C	D	E	F	G	H	I	J	K	L
S/NO	COMPANY NAME	TIN NO	TAX TYPE	YOA	AUDITED FIN STATEMENT OR MGT REPORT SUBMITTED BY COMPANY?	CAPITAL ALLOWANCE AMOUNT (N)	OUTCOME OF DESK REVIEW/TAX AUDIT/INVESTIGATION/VAT MONITORING	ADDITIONAL TAX LIABILITY (IF ANY)	OBSERVATIONS	RECOMMENDATION	FIRS RESPONSE
1	EMENITE LIMITED	00172381-0001	CIT	2018	AUDITED FIN STATEMENT	926,437,970.00	TAX INVESTIGATION WAS CARRIED OUT	1,113,882,949.00	<p>The additional assessment of N835,951,558.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N926,437,970.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to</p>	The Company should be made to pay additional tax liability of N1,113,882,949.00 (i.e. N835,951,558.00 plus N277,931,391.00) which should be raised against the company on the excess of relief claimed.	

							<p>N157,166,136.60 (i.e. CIT of 30% on N523,887,122.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,039,591,299.60 (i.e. N882,425,163.00 plus N157,166,136.60) on the excess of relief claimed.</p>		
			2020	AUDITED FIN STATEMENT	1,016,311,199.00	TAX INVESTIGATION WAS CARRIED OUT	547,067,040.70	<p>The additional assessment of N242,173,681.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year via Assessment No: TID/SD/CIT/0010 dated 2nd September, 2022, were yet to be paid by the company.</p> <p>The Capital Allowance of N1,016,311,199.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID)</p>	<p>The Company should be made to pay additional tax liability of N547,067,040.70 (i.e. N242,173,681.00 plus N304,893,359.70 as a result of Tax Investigation findings on CIT for the 2020 Assessment year.</p>

								<p>of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N304,893,359.70 (i.e. CIT of 30% on N1,016,311,199.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N547,067,040.70 (i.e. N242,173,681.00 plus N304,893,359.70) on the excess of relief claimed.</p>		
				2021	AUDITED FIN STATEMENT	501,533,807.00	DESK REVIEW WAS CONDUCTED	1,436,913,984.10	<p>The additional assessment of N1,286,453,842.00 raised on the Company by the FIRS as per Tax Demand Notice on CIT for the 2021 Assessment year via Assessment No: LTO/AWK/CIT-D/009 dated 4th July, 2023, were yet to be paid by the company.</p> <p>The Capital Allowance of N501,533,807.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID)</p>	<p>he Company should be made to pay additional tax liability of N1,436,913,984.10 (i.e. N1,286,453,842.00 plus N150,460,142.10) on the excess of relief claimed for 2021 Assessment year.</p>

							<p>of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N150,460,142.10 (i.e. CIT of 30% on N501,533,807.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,436,913,984.10 (i.e. N1,286,453,842.00 plus N150,460,142.10) on the excess of relief claimed.</p>	
	VAT	2018	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE	NIL	<p>The Company did not file monthly Tax returns in 2018 YOA and there was no VAT monitoring exercise carried out on the Company by the FIRS.</p>	<p>The reason(s) why the Company failed to file monthly Tax returns in 2018 YOA and also failure to carry out VAT monitoring exercise by the FIRS should be explained by the EC-FIRS.</p>
		2019	AUDITED FIN STATEMENT	N/A	VAT MONITORING	114,603,510.00	<p>The additional assessment of N114,603,510.00 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2019 Assessment year via Assessment No: LTO/AWK/VAT-INV/053AD dated 17th September, 2021, were</p>	<p>The Company should be made to pay additional VAT liability of N114,603,510.00 for the 2019 Assessment year.</p>

							yet to be paid by the company.		
			2020	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.
			2021	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.
		EDT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	NIL	The sum of N40,000,000.00 paid in four tranches at N10,000,000.00 each by Emenite Limited on 11th June, 2018 as Education Tax with Payment Reference numbers: ZIB/FIRS/11-06-2018/909673; ZIB/FIRS/11-06-2018/909658; ZIB/FIRS/11-06-2018/909728 and ZIB/FIRS/11-06-2018/909699 paid at Zenith Bank - Presidential Road under SCAEE - MTO ENUGU were not found in the FIRS Revenue Reports submitted to the Team of Federal Auditors.	The FIRS should investigate the whereabouts of this N40,000,000.00 paid in four tranches at N10,000,000.00 each by Emenite Limited on 11th June, 2018 as Education Tax with Payment Reference numbers: ZIB/FIRS/11-06-2018/909673; ZIB/FIRS/11-06-2018/909658; ZIB/FIRS/11-06-2018/909728 and ZIB/FIRS/11-06-2018/909699 paid at Zenith Bank - Presidential Road under SCAEE - MTO ENUGU which were not found in the FIRS

								Revenue Reports submitted to the Team of Federal Auditors.	
			2019	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	34,048,284.00	<p>The additional assessment of N34,048,284.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: LTO/AWK/EDT-INV/042AD, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N34,048,284.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.
			2020	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	16,144,912.00	<p>The additional assessment of N16,144,912.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year via Assessment No: TID/SD/EDT/0010 dated 2nd September, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected</p>	The Company should be made to pay the additional assessment of N16,144,912.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.

							above.		
			2021	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	85,781,589.00	<p>The additional assessment of N85,781,589.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/ET-D/005 dated 4th July, 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N85,781,589.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/ET-D/005 dated 4th July, 2023.
		WHT	2018	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	NIL	NIL
			2019	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	129,614,655.00	<p>The amount of N129,614,655.00 (Tax Payable - N100,476,477; Penalty @ 10% - N10,047,648; and Interest @ 19% - N19,090,531) raised in Demand Notice with Reference Number: LTO/AWK/WHT-INV/048AD dated 30th June, 2021 against the Company by the FIRS for failure to pay WHTax on the due date were yet to</p>	Explanation should be provided on the observation raised

									be paid by the company. The Company should be made to pay the tax liability as reflected above.	
				2020	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	167,751,136.00	The amount of N167,751,136.00 (Tax Payable - N130,039,640; Penalty @ 10% - N13,003,964; and Interest @ 19% - N24,707,532) raised in Demand Notice with Reference Number: LTO/AWK/WHT-INV/047AD dated 30th June, 2021 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company. The Company should be made to pay the tax liability as reflected above.	Explanation should be provided on the observation raised
				2021	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	NIL	NIL
2	INNOSON NIG. LTD	00432429-0001	CIT	2018	AUDITED FIN STATEMENT	203,903,212.00	TAX INVESTIGATION WAS CARRIED OUT	120,638,516.20	The additional assessment of N59,467,552.60 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year via Assessment No:	The Company should be made to pay additional tax liability of N120,638,516.20 (i.e. N59,467,552.60 plus N61,170,963.60) on the excess of relief

								<p>LTO/AWK/CT-INV/117, dated 5th October, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N203,903,212.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N61,170,963.60 (i.e. CIT of 30% on N203,903,212.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N120,638,516.20 (i.e. N59,467,552.60 plus N61,170,963.60) on the excess of relief claimed.</p>	<p>claimed.</p>
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			2019	AUDITED FIN STATEMENT	203,903,212.00	TAX INVESTIGATION WAS CARRIED OUT	130,109,784.20	<p>The additional assessment of N68,938,820.60 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No: LTO/AWK/CT-INV/116, dated 5th October, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N203,903,212.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N61,170,963.60 (i.e. CIT of 30% on N203,903,212.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N130,109,784.20 (i.e. N68,938,820.60 plus N61,170,963.60) on the</p>	The Company should be made to pay additional tax liability of N130,109,784.20 (i.e. N68,938,820.60 plus N61,170,963.60) on the excess of relief claimed.
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							of 30% on N165,452,396.00) additional Tax liability.				
							In total, the Company should be made to pay additional tax liability of N181,640,654.80 (i.e. N68,938,820.60 plus N61,170,963.60) on the excess of relief claimed.				
				2021	AUDITED FIN STATEMENT	1,907,287,964.00	DESK REVIEW WAS CARRIED OUT	626,186,389.20	<p>The administrative assessment of N54,000,000.00 was raised on the Company by the FIRS on CIT for the 2021 Assessment year via letter Reference No: LTO/AWK/RPP/02414081-000/001/2021, dated 7th September, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N1,907,287,964.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and</p>	The Company should be made to pay additional tax liability of N626,186,389.20 (i.e. NN54,000,000.00 plus N572,186,389.20) on the excess of relief claimed.	

							<p>hence, this sum should be subjected to tax which will amount to N572,186,389.20 (i.e. CIT of 30% on N1,907,287,964.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N626,186,389.20 (i.e. NN54,000,000.00 plus N572,186,389.20) on the excess of relief claimed.</p>		
	VAT	2018	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
		2019	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
		2020	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
		2021	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING EXERCISE WAS CONDUCTED	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	

			EDT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	7,482,774.26	<p>The additional assessment of N7,482,774.26 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/ET-INV/120, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N7,482,774.26 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year.	
				2019	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	7,311,752.26	<p>The additional assessment of N7,311,752.26 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: LTO/AWK/ET-INV/119, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N7,311,752.26 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	

				2020	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	10,653,281.00	<p>The additional assessment of N10,653,281.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year via Assessment No: LTO/AWK/ET-INV/118, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N10,653,281.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.	
				2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	10,000,000.00	<p>The administrative assessment of N10,000,000.00 was raised on the Company by the FIRS on EDT for the 2021 Assessment year via letter Reference No: LTO/AWK/RPP/02414081-000/001/2021, dated 7th September, 2021, which were yet to be paid by the company.</p>	The Company should be made to pay the administrative assessment liability of N10,000,000.00 on EDT arising from delay in filing 2020 Audited Financial Statement for 2021 year of Assessment.	

			WHT	2018	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	2,759,038.00	<p>The amount of N2,759,038.00 (Tax Payable - N2,138,789; Penalty @ 10% - N213,879; and Interest @ 19% - N406,370) raised in Demand Notice with Reference Number: LTO/AWK/WHT-INV/125 dated 5th October, 2021 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	<p>The Company should be made to pay the sum of N2,759,038.00 raised in the Demand Notice with Reference number:LTO/AWK/WHT-INV/125 dated 5th October, 2021, against the Company by the FIRS for failure to pay WHTax on the due date.</p>
				2019	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,063,677.00	<p>The amount of N1,063,677.00 (Tax Payable - N824,556; Penalty @ 10% - N82,456; and Interest @ 19% - N156,666) raised in Demand Notice with Reference Number: LTO/AWK/WHT-INV/124 dated 5th October, 2021 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be</p>	<p>The Company should be made to pay the sum of N1,063,677.00 raised in the Demand Notice with Reference number: LTO/AWK/WHT-INV/124 dated 5th October, 2021, against the Company by the FIRS for failure to pay WHTax on the due date.</p>

									made to pay the tax liability as reflected above.	
				2020	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,811,225.00	<p>The amount of N1,811,225.00 (Tax Payable - N1,404,050; Penalty @ 10% - N140,405; and Interest @ 19% - N266,770) raised in Demand Notice with Reference Number: LTO/AWK/WHT-INV/123 dated 5th October, 2021 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	The Company should be made to pay the sum of N1,811,225.00 raised in the Demand Notice with Reference number: LTO/AWK/WHT-INV/123 dated 5th October, 2021, against the Company by the FIRS for failure to pay WHTax on the due date.
				2021	AUDITED FIN STATEMENT	N/A	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	No Tax investigation was carried out in the period under review.	No Tax investigation was carried out in the period under review.
3	PEACE MASS TRANSIT LIMITED	00194888-0001	CIT	2018	AUDITED FIN STATEMENT	666,785,885.00	TAX INVESTIGATION WAS CARRIED OUT	205,014,265.50	The additional assessment of N4,978,500.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year via Assessment No: AA/2018/CIT/0000155, were yet to be paid by the	The Company should be made to pay additional tax liability of N205,014,265.50 (i.e. N4,978,500.00 plus N200,035,765.50) on the excess of relief claimed.

								<p>company.</p> <p>The Capital Allowance of N666,785,885.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N200,035,765.50 (i.e. CIT of 30% on N666,785,885.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N205,014,265.50 (i.e. N4,978,500.00 plus N200,035,765.50) on the excess of relief claimed.</p>	
			2019	AUDITED FIN STATEMENT	718,785,580.00	TAX INVESTIGATION WAS CARRIED OUT	223,953,769.00	<p>The additional assessment of N8,318,095.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No: AA/2019/CIT/0000156, were yet to be paid by the</p>	<p>The Company should be made to pay additional tax liability of N223,953,769.00 (i.e. N8,318,095.00 plus N215,635,674.00) on the excess of relief claimed.</p>

								<p>company.</p> <p>The Capital Allowance of N718,785,580.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N215,635,674.00 (i.e. CIT of 30% on N718,785,580.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N223,953,769.00 (i.e. N8,318,095.00 plus N215,635,674.00) on the excess of relief claimed.</p>	
			2020	AUDITED FIN STATEMENT	704,582,768.00	TAX INVESTIGATION WAS CARRIED OUT	223,953,769.00	<p>The additional assessment of N8,620,745.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No: AA/2019/CIT/0000157, were yet to be paid by the</p>	<p>The Company should be made to pay additional tax liability of N219,995,575.40 (i.e. N8,620,745.00 plus N211,374,830.40) on the excess of relief claimed.</p>

								<p>company.</p> <p>The Capital Allowance of N704,582,768.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N211,374,830.40 (i.e. CIT of 30% on N704,582,768.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N219,995,575.40 (i.e. N8,620,745.00 plus N211,374,830.40) on the excess of relief claimed.</p>	
			2021	AUDITED FIN STATEMENT	570,606,893.00	TAX INVESTIGATION WAS NOT CARRIED OUT	291,182,067.90	<p>The Notice of assessment with the value of N120,000,000.00 raised against the Company by the FIRS on CIT for the 2021 Assessment year via Assessment No: LTO/AWK/CIT-D/007, dated 13th June, 2023, were yet to be paid by the</p>	<p>The Company should be made to pay additional tax liability of N291,182,067.90 (i.e. N120,000,000.00 plus N171,182,067.90) on the excess of relief claimed.</p>

									<p>company.</p> <p>The Capital Allowance of N570,606,893.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N171,182,067.90 (i.e. CIT of 30% on N570,606,893.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N291,182,067.90 (i.e. N120,000,000.00 plus N171,182,067.90) on the excess of relief claimed.</p>		
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			VAT	2018	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CARRIED OUT	707,572.32	The additional assessment of N707,572.32 was raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019 Accounts via a letter with Reference No: FIRS/LTAPH/2021/001948 88-0001, dated 10th August, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N707,572.32 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019 Accounts via a letter with Reference No: FIRS/LTAPH/2021/00194888-0001, dated 10th August, 2021.
				2019	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CARRIED OUT	675,740.00	The additional assessment of N675,740.00 was raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019 Accounts via a letter with Reference No: FIRS/LTAPH/2021/001948 88-0001, dated 10th August, 2021, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N675,740.00 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019 Accounts via a letter with Reference No: FIRS/LTAPH/2021/00194888-0001, dated 10th August, 2021.
			EDT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	995,700.00	The additional assessment of N995,700.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year via Assessment No: AA/2018/EDT/0000161,	The Company should be made to pay the additional assessment of N995,700.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due

						<p>were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>for the 2018 Assessment year.</p>
2019	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	1,663,620.00	<p>The additional assessment of N1,663,620.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: AA/2018/EDT/0000152, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N1,663,620.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.</p>	
2020	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	1,724,150.00	<p>The additional assessment of N1,724,150.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No: AA/2018/EDT/0000158, were yet to be paid by the company.</p>	<p>The Company should be made to pay the additional assessment of N1,724,150.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.</p>	

								The Company should be made to pay additional tax liability as reflected above.	
			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW	25,000,000.00	<p>The additional assessment of N25,000,000.00 raised on the Company by the FIRS as per Notice of Assessment on Education Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/ET-D/003, dated 13th June, 2023 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N25,000,000.00 raised on the Company by the FIRS as per Desk Review on Education Tax due for the 2021 Assessment year.
		WHT	2018	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	822,550.00	<p>The amount of N822,550.00 raised in Demand Notice with Reference Number: AA/2017/WHT/0000164 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be made to pay the tax</p>	The Company should be made to pay the sum of N822,550.00 raised in the Demand Notice with Reference number: AA/2017/WHT/0000 164 against the Company by the FIRS for failure to pay WHTax on the due.

						liability as reflected above.			
			2019	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,003,250.00	<p>The amount of N1,003,250.00 raised in Demand Notice with Reference Number: AA/2017/WHT/0000165 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	The Company should be made to pay the sum of N1,003,250.00 raised in the Demand Notice with Reference number: AA/2017/WHT/0000 165 against the Company by the FIRS for failure to pay WHTax on the due.
			2020	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	791,150.00	<p>The amount of N791,150.00 raised in Demand Notice with Reference Number: AA/2017/WHT/0000166 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	The Company should be made to pay the sum of N791,150.00 raised in the Demand Notice with Reference number: AA/2017/WHT/0000 166 against the Company by the FIRS for failure to pay WHTax on the due.
			2021	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED	NIL	NIL	NIL

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4	R & S LOTTO LIMITED	09113514-0001	CIT	2018	AUDITED FIN STATEMENT	73,614,578.00	DESK REVIEW WAS CARRIED OUT	103,242,219.10	<p>The additional assessment of N81,157,845.70 raised on the Company by the FIRS as per the Desk Review on CIT for the 2018 Assessment year via Assessment No: FIRS/TID/SCD/2021/0163/90, were yet to be paid by the company.</p> <p>The Capital Allowance of N73,614,578.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N22,084,373.40 (i.e. CIT of 30% on N73,614,578.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N103,242,219.10 (i.e. N81,157,845.70 plus N22,084,373.40) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N103,242,219.10 (i.e. N81,157,845.70 plus N22,084,373.40) on the excess of relief claimed.

			2019	AUDITED FIN STATEMENT	21,829,996.00	DESK REVIEW WAS CARRIED OUT	124,778,461.97	<p>The additional assessment of N118,229,463.17 raised on the Company by the FIRS as per the Desk Review on CIT for the 2018 Assessment year via Assessment No: FIRS/TID/SCD/2021/0163/90, were yet to be paid by the company.</p> <p>The Capital Allowance of N21,829,996.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N6,548,998.80 (i.e. CIT of 30% on N21,829,996.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N124,778,461.97 (i.e. N118,229,463.17 plus N6,548,998.80) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N124,778,461.97 (i.e. 118,229,463.17 plus N6,548,998.80) on the excess of relief claimed.
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			2020	AUDITED FIN STATEMENT	19,100,000.00	DESK REVIEW WAS CARRIED OUT	153,893,568.14	<p>The additional assessment of N148,163,568.14 raised on the Company by the FIRS as per the Desk Review on CIT for the 2020 Assessment year via Assessment No: FIRS/TID/SCD/2021/0163/90, were yet to be paid by the company.</p> <p>The Capital Allowance of N19,100,000.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N5,730,000.00 (i.e. CIT of 30% on N19,100,000.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N153,893,568.14 (i.e. N148,163,568.14 plus N5,730,000.00) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N153,893,568.14 (i.e. N148,163,568.14 plus N5,730,000.00) on the excess of relief claimed.
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			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	39,526,048.00	The Company Income Tax of N39,526,048 was raised on the Company by the FIRS through the Taxpromax platform for the 2021 Assessment year, which sum were yet to be paid by the company.	The Company should be made to pay the sum of N39,526,048 raised by the FIRS through the Taxpromax platform for the 2021 Assessment year, which were yet to be paid by the company.	
		VAT	2018	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING WAS CARRIED OUT	NIL	NIL	NIL	
			2019	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING WAS CARRIED OUT	NIL	NIL	NIL	
			2020	AUDITED FIN STATEMENT	N/A	DESK REVIEW WAS CARRIED OUT	994,651.50	The additional assessment of N2,994,651.50 was raised against the Company by the FIRS on VAT as a result of Desk Review conducted on 2019 Account via a letter dated 8th May, 2020, of which only the sum of N2,000,000.00 was paid by the company.	The Company should be made to pay the additional tax liability of N994,651.50 raised against the Company by the FIRS on VAT as a result of Desk Review conducted on 2019 Account via a letter dated 8th May, 2020.	
			2021	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING WAS CARRIED OUT	NIL	NIL	NIL	

			EDT	2018	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	6,482,028.00	<p>The additional assessment of N6,482,028.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2018 Assessment year via Assessment No: FIRS/TID/SCD/2021/0163/90, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N6,482,028.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2018 Assessment year.	
				2019	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	36,102,214.00	<p>The additional assessment of N36,102,214.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2019 Assessment year via Assessment No: FIRS/TID/SCD/2021/0163/90, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N36,102,214.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2019 Assessment year.	

			2020	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	43,789,264.00	<p>The additional assessment of N43,789,264.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: FIRS/TID/SCD/2021/0163/90, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N43,789,264.00 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year.	
			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	2,635,070.00	<p>The additional assessment of N2,635,070.00 raised on the Company by the FIRS as per the Taxpromax Company Income Tax Assessment due for the 2021 Assessment year were yet to be paid by the company.</p> <p>The Company should be made to pay the Tax liability due as reflected above.</p>	The Company should be made to pay the Tax liability of N2,635,070.00 raised on the Company by the FIRS as per the Taxpromax Company Income Tax Assessment due for the 2021 Assessment year.	

			WHT	2018	AUDITED FIN STATEMENT	N/A	DESK REVIEW WAS CARRIED OUT	22,754,950.00	<p>The amount of N22,754,9505.00 (Tax Due - N17,639,496; Penalty @ 10% - N1,763,950; and Interest @ 19% - N3,351,504) raised in Demand Notice with Reference Number: FIRS/TID/SCD/2021/0163/90 dated 15th June, 2021 against the Company by the FIRS for failure to pay WHTax on the due date, were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	<p>The Company should be made to pay the sum of N22,754,9505.00 raised in the Demand Notice with Reference number: FIRS/TID/SCD/2021/0163/90 dated 15th June, 2021 against the Company by the FIRS for failure to pay WHTax on the due date.</p>
				2019	AUDITED FIN STATEMENT	N/A	NO TAX AUDIT WAS CARRIED OUT	NIL	NIL	<p>Tax Audit must be conducted on the Company to ascertain the WHTax payable during the period under review.</p>
				2020	AUDITED FIN STATEMENT	N/A	NO TAX AUDIT WAS CARRIED OUT	NIL	NIL	<p>Tax Audit must be conducted on the Company to ascertain the WHTax payable during the period under review.</p>
				2021	AUDITED FIN STATEMENT	N/A	NO TAX AUDIT WAS CARRIED OUT	NIL	NIL	<p>Tax Audit must be conducted on the Company to ascertain the WHTax payable during the</p>

									period under review.		
5	ARDAGH GLASS PACKAGING NIGERIA LIMITED	01195968- 0001	CIT	2018	AUDITED FIN STATEMENT	689,655,934.00	TAX AUDIT WAS CARRIED OUT	206,896,780.20	<p>This Company was incorporated on 15th August, 2001 as Glassforce Limited, changed to Consol Glass Nigeria Limited on the 19th August, 2021 and was later changed to Ardagh Glass Packaging Nigeria Limited on the 28th July, 2022 with the same Company Registration No. 424859 and the same Tax Identification Number: 01195968-0001</p> <p>The Company claimed Capital Allowance of N689,655,934.00 in the 2018 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N206,896,780.20 (i.e. CIT of 30% on N689,655,934.00) additional Tax liability.</p>	The Company should be made to pay additional tax liability of N206,896,780.20 (i.e. CIT of 30% on N689,655,934.00) on the excess of relief claimed.	

			2019	AUDITED FIN STATEMENT	684,679,009.00	TAX AUDIT WAS CARRIED OUT	205,403,702.70	<p>This Company was incorporated on 15th August, 2001 as Glassforce Limited, changed to Consol Glass Nigeria Limited on the 19th August, 2021 and was later changed to Ardagh Glass Packaging Nigeria Limited on the 28th July, 2022 with the same Company Registration No. 424859 and the same Tax Identification Number: 01195968-0001</p> <p>The Company claimed Capital Allowance of N684,679,009.00 in the 2019 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N205,403,702.70 (i.e. CIT of 30% on N684,679,009.00) additional Tax liability.</p>	The Company should be made to pay additional tax liability of N205,403,702.70 (i.e. CIT of 30% on N689,655,934.00) on the excess of relief claimed.
			2020	AUDITED FIN STATEMENT	484,318,539.00	TAX AUDIT WAS CARRIED OUT	145,295,561.70	This Company was incorporated on 15th August, 2001 as	The Company should be made to pay additional tax liability

								<p>Glassforce Limited, changed to Consol Glass Nigeria Limited on the 19th August, 2021 and was later changed to Ardagh Glass Packaging Nigeria Limited on the 28th July, 2022 with the same Company Registration No. 424859 and the same Tax Identification Number: 01195968-0001</p> <p>The Company claimed Capital Allowance of N484,318,539.00 in the 2020 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N145,295,561.70 (i.e. CIT of 30% on N484,318,539.00) additional Tax liability.</p>	<p>of N145,295,561.70 (i.e. CIT of 30% on N484,318,539.00) on the excess of relief claimed.</p>
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			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CONDUCTED	23,000,000.00	<p>This Company was incorporated on 15th August, 2001 as Glassforce Limited, changed to Consol Glass Nigeria Limited on the 19th August, 2021 and was later changed to Ardagh Glass Packaging Nigeria Limited on the 28th July, 2022 with the same Company Registration No. 424859 and the same Tax Identification Number: 01195968-0001</p> <p>The additional assessment of N23,000,000.00 raised on the Company by the FIRS as per the Desk Review conducted on the Company Income Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/CT-MIN/003, dated 23rd March, 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay additional tax liability of N23,000,000.00 raised on the Company by the FIRS as per the Desk Review conducted on the Company Income Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/CT-MIN/003, dated 23rd March, 2023.</p>
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			VAT	2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	34,438.00	<p>The additional assessment of N34,438.00 raised on the Company by the FIRS as per the Tax Audit on Value Added Tax due for the 2018 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N34,438.00 raised on the Company by the FIRS as per the Tax Audit conducted on Value Added Tax due for the 2018 Assessment year.	
				2019	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	1,532,630.00	<p>The additional assessment of N1,532,630.00 raised on the Company by the FIRS as per the Tax Audit on Value Added Tax due for the 2019 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N1,532,630.00 raised on the Company by the FIRS as per the Tax Audit conducted on Value Added Tax due for the 2019 Assessment year.	
				2020	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	NIL	NIL	NIL	

			2021	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	20,337,888.00	<p>The additional assessment of N20,337,888.00 raised on the Company by the FIRS as per the Tax Audit on Value Added Tax due for the 2021 Assessment year via Assessment No: FIRS/AWKLTO/2023/0195 968-0001/03, dated 10th July, 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N20,337,888.00 raised on the Company by the FIRS as per the Tax Audit conducted on Value Added Tax due for the 2021 Assessment year.	
		EDT	2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	2,242,273.00	<p>The additional assessment of N2,242,273.00 raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2018 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N2,242,273.00 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2018 Assessment year.	

			WHT	2018	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CARRIED OUT	148,718.00	<p>The additional assessment of N148,718.00 raised on the Company by the FIRS as per the Tax Audit on WHTax due for the 2018 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N148,718.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2018 Assessment year.	
				2019	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CARRIED OUT	6,567.00	<p>The additional assessment of N6,567.00 raised on the Company by the FIRS as per the Tax Audit on WHTax due for the 2019 Assessment year via Assessment No: FIRS/LTAPH/01195968-0001/2021/532, dated 2nd June, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N6,567.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2019 Assessment year.	

				2021	AUDITED FIN STATEMENT	N/A	DESK REVIEW WAS CONDUCTED	113,719,919.00	<p>The additional assessment of N113,719,919.00 raised on the Company by the FIRS as per the Desk Review on WHTax due for the 2021 Assessment year via Assessment No: LTO/AWK/WHT/003, dated 23rd March, 2023, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N113,719,919.00 raised on the Company by the FIRS as per the Tax Audit conducted on WHTax due for the 2021 Assessment year.
6	CUTIX PLC	00362300-0001	CIT	2018	AUDITED FINANCIAL STATEMENT	NIL	DESK REVIEW	786,678.91	<p>The additional assessment of N786,678.91 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/CIT-INV/100, dated 21st September, 2021, were yet to be paid by the company.</p>	The Company should be made to pay additional tax liability of N786,678.91 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/CIT-INV/100, dated 21st September, 2021.

			2019	AUDITED FIN STATEMENT	NIL	DESK REVIEW	15,040,989.98	The additional assessment of N15,040,989.98 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2019 Assessment year via Assessment No: LTO/AWK/CIT-INV/099, dated 21st September, 2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N15,040,989.98 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2019 Assessment year via Assessment No: LTO/AWK/CIT-INV/099, dated 21st September, 2021.
			2020	AUDITED FIN STATEMENT	NIL	DESK REVIEW	19,981,516.69	The additional assessment of N19,981,516.69 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2020 Assessment year via Assessment No: LTO/AWK/CIT-INV/098, dated 21st September, 2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N19,981,516.69 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2020 Assessment year via Assessment No: LTO/AWK/CIT-INV/098, dated 21st September, 2021.

			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW	10,618,901.30	The additional assessment of N10,618,901.30 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/CIT-INV/097, dated 21st September, 2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N10,618,901.30 raised on the Company by the FIRS as per the Desk Review on Company Income Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/CIT-INV/097, dated 21st September, 2021.
	VAT		2018	AUDITED FIN STATEMENT	NIL	NO DESK REVIEW CONDUCTED	NIL	No Desk Review was conducted to ascertain the Value Added Tax liability due for the 2018 Assessment year.	The EC-FIRS should ensure that Desk Review is conducted on the company to ascertain the Value Added Tax liability due for the 2018 Assessment year.
			2019	AUDITED FIN STATEMENT	NIL	DESK REVIEW	4,710,915.59	The additional assessment of N4,710,915.59 raised on the Company by the FIRS as per the Desk Review on Value Added Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/VT-INV/12, dated 21st September, 2021, were yet to be paid by the company. The Company should be made to pay additional	The Company should be made to pay the additional assessment of N4,710,915.59 raised on the Company by the FIRS as per the Desk Review conducted on Value Added Tax due for the 2018 Assessment year.

						tax liability as reflected above.		
		2020	AUDITED FIN STATEMENT	NIL	DESK REVIEW	49,083,797.00	<p>The Value Added Tax of N49,083,797.00 was raised on the Company by the FIRS through the Taxpromax platform for the 2020 Assessment year, which sum were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the Value Added Tax assessment of N49,083,797.00 raised on the Company by the FIRS through the Taxpromax platform for the 2020 Assessment year,
		2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW	NIL	NIL	NIL
	EDT	2018	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS DONE	52,445.26	<p>The additional assessment of N52,445.26 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/ET-INV/105, dated 21st September, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N52,445.26 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2018 Assessment year.

				2019	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS DONE	190,830.62	<p>The additional assessment of N190,830.62 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2019 Assessment year via Assessment No: LTO/AWK/ET-INV/104, dated 21st September, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N190,830.62 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2019 Assessment year.</p>
				2020	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS DONE	478,081.60	<p>The additional assessment of N478,081.60 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year via Assessment No: LTO/AWK/ET-INV/103, dated 21st September, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N478,081.60 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2020 Assessment year.</p>

				2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS DONE	342,891.40	<p>The additional assessment of N342,891.40 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year via Assessment No: LTO/AWK/ET-INV/102, dated 21st September, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N342,891.40 raised on the Company by the FIRS as per the Desk Review conducted on Education Tax due for the 2021 Assessment year.</p>
7	ENUGU ELECTRICITY DISTRIBUTION PLC	17843873-0001	CIT	2018	AUDITED FINANCIAL STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	155,500.00	<p>The additional assessment of N155,500.00 raised on the Company by the FIRS as per the Tax Audit conducted on Company Income Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/CIT-AUD/135, dated 13th October, 2021, were yet to be paid by the company.</p>	<p>The Company should be made to pay additional tax liability of N155,500.00 raised on the Company by the FIRS as per the Tax Audit conducted on Company Income Tax due for the 2018 Assessment year via Assessment No: LTO/AWK/CIT-AUD/135, dated 13th October, 2021.</p>

			2019	AUDITED FINANCIAL STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	38,092,954.59	The outstanding sum of N38,092,954.59 arising from the self assessment of Minimum Tax of N68,486,545.00 on the Company as a result of loss position at the year end, were yet to be paid by the company.	The Company should be made to pay the outstanding sum of N38,092,954.59 arising from the self assessment of Minimum Tax of N68,486,545.00 on the Company as a result of loss position at the year end.
			2020	AUDITED FINANCIAL STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	297,100,000.00	The sum of N297,100,000.00 raised as Self assessment on Company Income Tax by the COmpany as contained in the Self Assessment No: LTO/AWK/SA/030, dated 24th December, 2020, were yet to be paid by the company.	The Company should be made to pay the sumN297,100,000.00 raised as Self assessment on Company Income Tax by the COmpany as contained in the Self Assessment No: LTO/AWK/SA/030, dated 24th December, 2020
			2021	AUDITED FINANCIAL STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	520,000,000.00	The sum of N520,000,000.00 raised as additional assessment on Company Income Tax by the FIRS via Assessment No: LTO/AWK/CIT/011, dated 24th February, 2022, were yet to be paid by the company.	The Company should be made to pay the sum of sum of N520,000,000.00 raised as additional assessment by the FIRS via Assessment No: LTO/AWK/CIT/011, dated 24th February, 2022.

			VAT	2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CONDUCTED	289,432,032.00	<p>The additional VAT liabilities of N289,432,032 raised on the Company as Value Added Tax as a result of Tax Audit carried out via Assessment Reference No: LTO/AWK/VT-AUD/144, dated 13th October, 2021, are yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional VAT liabilities of N289,432,032 raised on the Company as Value Added Tax as a result of Tax Audit carried out via Assessment Reference No: LTO/AWK/VT-AUD/144, dated 13th October, 2021</p>
				2019	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CONDUCTED	992,246,180.38	<p>The outstanding VAT liabilities of N992,246,180.38 contained in the letter dated 7th October, 2019 from the Deputy Managing Director of Enugu Electricity Distribution Company Plc to the Executive Chairman of Federal Inland Revenue Service, are yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the outstanding VAT liabilities of N992,246,180.38 contained in the letter dated 7th October, 2019 from the Deputy Managing Director of Enugu Electricity Distribution Company Plc to the Executive Chairman of Federal Inland Revenue Service.</p>

			2020	AUDITED FINANCIAL STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	248,712,967.37	The Self Assessment of N248,712,967.37 raised regarding the Value Added Tax on the Company in 2020 year end, were yet to be paid by the company.	The Company should be made to pay the sum of N248,712,967.37 arising from the self assessment.	
			2021	AUDITED FINANCIAL STATEMENT	NIL	NO VAT MONITORING WAS CONDUCTED	NIL	NIL	The FIRS should conduct a VAT monitoring exercise for the period under review to ascertain the VAT liability for the period.	
		EDT	2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CONDUCTED	NIL	NIL	NIL	
			2021	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CONDUCTED	81,000,000.00	The sum of N81,000,000.00 raised as additional assessment on Education Tax by the FIRS via Assessment No: LTO/AWK/CIT/011, dated 24th February, 2022, were yet to be paid by the company.	The Company should be made to pay of sum of N81,000,000.00 raised as additional assessment on Education Tax by the FIRS via Assessment No: LTO/AWK/CIT/011, dated 24th February, 2022.	

			WHT	2018	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CONDUCTED	259,847,857.00	<p>The amount of N259,847,857.00 (Tax Due - N210,432,447; Penalty @ 10% - N20,143,245; and Interest @ 19% - N38,272,165) raised in Demand Notice with Reference Number: LTO/AWK/WT-AUD/139 dated 15th October, 2021 against the Company by the FIRS for failure to pay WHTax on the due date, were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	<p>The Company should be made to pay the sum of N259,847,857.00 raised in Demand Notice with Reference Number: LTO/AWK/WT-AUD/139, dated 15th October, 2021 against the Company by the FIRS for failure to pay WHTax on the due date.</p>
				2019	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS NOT CONDUCTED	NIL	NIL	<p>The FIRS should conduct a Tax Audit exercise for the period under review to ascertain the WHT liability for the period.</p>
				2020	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS NOT CONDUCTED	NIL	NIL	<p>The FIRS should conduct a Tax Audit exercise for the period under review to ascertain the WHT liability for the period.</p>

				2021	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS NOT CONDUCTED	NIL	NIL	The FIRS should conduct a Tax Audit exercise for the period under review to ascertain the WHT liability for the period.	
8	EVER OIL & GAS LTD	02446774-0001	CIT	2018	AUDITED FIN STATEMENT	108,281,964.00	Revised tax computation was done and additional tax due was 403,337.00	NIL	Revised tax computation was done and additional tax due was 403,337.00, but no evidence of payment	The company should produce evidence of payment	
				2019	AUDITED FIN STATEMENT	3,466,175,919.00	NOT SEEN	NIL	The Company claimed Capital Allowance of N3,466,175,919.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
				2020	AUDITED FIN STATEMENT	785,962,006.00	Tax Audit done	1,959,870.15	Additional tax liabilities from tax audit exercise was as follows: CIT 1,959,870.15, but no evidence of payment.	The company should produce evidence of payment	

			2021	AUDITED FIN STATEMENT	857,397,711.00	NOT SEEN	NIL	The Company claimed Capital Allowance of N3,466,175,919.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
		EDT	2018	N/A	N/A	Amended assessment reveals an outstanding EDT of 391,974.00	391,974.00	Revised tax computation was done and additional tax due was 391,974.00, but no evidence of payment	Evidence of payment be provided	
			2019	N/A	N/A	Revised tax computation was done and additional tax due was 572,508.00	572,508.00	Revised tax computation was done and additional tax due was 572,508.00, but no evidence of payment	Evidence of payment be provided	
			2020	N/A	N/A	NIL	NIL	NIL		
			2021	N/A	N/A	NIL	NIL	NIL		
		WHT	2018	N/A	N/A	WHT on additional fixed assets amounting to 46,012,863.40	NIL	WHT on additions to fixed assets was raised but no evidence of payment	Company should produce evidence of payment	

9	UGO-HANNAH ENERGY LTD	18031009-0001	CIT	2018	AUDITED FIN STATEMENT	94,073,466.00	The company failed to file its 2018 income tax returns. A demand notice of 2,167,789.70 as CIT	NIL	A demand notice of 2,167,789.70 for CIT, but no evidence of payment	The company should produce evidence of payment
				2019	AUDITED FIN STATEMENT	109,665,825.00	NIL	NIL	The Company claimed Capital Allowance of N109,665,825.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged
				2020	AUDITED FIN STATEMENT	44,921,566.00	NIL	NIL	The Company claimed Capital Allowance of N44,921,566.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high,	Company should provide evidence of CAFA or tax liability be charged

									compared to the N4,989,050 paid last year.		
				2021	AUDITED FIN STATEMENT	22,686,627.00	The review indicate that the company did not file the 2020 Audited account for 2021 Assessment year	NIL	Best of judgement 2021 YOA of 4,200,000.00 CIT and 1,000,000.00 EDT raised against the company for not filing 2020 Audited account, but no evidence of payment	The company should produce evidence of payment	
10	TONIMAS NIG LTD	01713867-0001	CIT	2018	AUDITED FIN. STATEMENT	661,812,980.00	NO INFO	NIL	The Company claimed Capital Allowance of N661,812,980.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
				2019	AUDITED FIN. STATEMENT	916,699,495.00	NO INFO	NIL	The Company claimed Capital Allowance of N916,699,495.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry	Company should provide evidence of CAFA or tax liability be charged	

								of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.		
			2020	AUDITED FIN. STATEMENT	809,646,795.00	NO INFO	NIL	The Company claimed Capital Allowance of N809,646,795.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
			2021	AUDITED FIN. STATEMENT	889,934,750.00	Re-assessment was carried out and the amount payable is 31,275,587.00	NIL	There is no evidence for payment of the outstanding re-assessment	The company should produce evidence of payment	
		VAT	2018	NONE				No evidence of VAT monitoring		
			2019	NONE	N/A			No evidence of VAT monitoring		

				2020	N/A	N/A	Re-assessment was carried out and the amount payable is 13,293,597.00	NIL	There is no evidence for payment of outstanding VAT of 13,293,597.00	The company should produce evidence of payment	
				2021	N/A	N/A	Desk review indicated a VAT outstanding of 30,986,327.00	NIL	There is no evidence for payment of outstanding VAT of 30,986,327.00	The company should produce evidence of payment	
11	TRANSIT SUPPORT SERVICES LTD	04287530-0001	CIT	2018	AUDITED FIN STATEMENT	17,303,000.00	NIL	Nil	The Company claimed Capital Allowance of N17,303,000.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
				2019	AUDITED FIN STATEMENT	24,578,000.00	NIL	NIL	The Company claimed Capital Allowance of N24,578,000.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized.	Company should provide evidence of CAFA or tax liability be charged	

						Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.		
	2020	FIN STATEMENT	NIL	NIL	NIL	Financial statement not audited	Company should explain why the financial statement not audited	
	2021	AUDITED FIN STATEMENT	31,693,000.00	Assessment notice of 724,673,009.14	NIL	Assessment Notice dated LTO/AWK/CIT/045 of 3/12/2021 is not yet paid as there is no evidence of payment attached	Company should provide evidence of payment	
VAT	2018	N/A	N/A	VAT on sales of scraps	2,394,042.00	The company is required to defray the VAT liabilities as computed, but no evidence of payment seen	Evidence of payment be provided	
	2019	N/A	N/A	NIL	NIL	No evidence of VAT monitoring	Explanation to be provided on the observation raised	
	2020	N/A	N/A	NIL	NIL	No evidence of VAT monitoring	Explanation to be provided on the observation raised	
	2021	N/A	N/A	NIL	NIL	No evidence of VAT monitoring	Explanation to be provided on the observation raised	
EDT	2018	N/A	N/A	The EDT was wrongly computed because loss was removed before arriving at the profit which 2% EDT was applied	5,277,900.00	The company is required to pay the recomputed EDT, but no evidence of payment made	Evidence of payment be provided	

				2021	N/A	N/A	A demand notice of 39,469,681.94 was served after an assessment notice dated 3/12/2021	NIL	A demand notice was served but no evidence of payment	Evidence of payment be provided	
			WHT	2018	N/A	N/A	WHT on fixed asset addition	1,223,307.00	Additional tax liabilities on fixed assets addition was imposed on the company, but no evidence of payment seen.	The company should produce evidence of payment	
12	TETRALOG NIG LTD	04165630-0001	CIT	2018	AUDITED FINANCIAL STATEMENTS	554,618,204.00	NOT SEEN	NIL	The Company claimed Capital Allowance of N554,618,204.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
				2019	AUDITED FINANCIAL STATEMENTS	554,618,204.00	NOT SEEN	NIL	The Company claimed Capital Allowance of N554,618,204.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate	Company should provide evidence of CAFA or tax liability be charged	

						Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.		
			2020	AUDITED FINANCIAL STATEMENTS	554,618,204.00	NOT SEEN	NIL	<p>The Company claimed Capital Allowance of N554,618,204.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.</p> <p>Company should provide evidence of CAFA or tax liability be charged</p>
			2021	AUDITED FINANCIAL STATEMENTS	554,618,204.00	NOT SEEN	NIL	<p>The Company claimed Capital Allowance of N554,618,204.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment.</p> <p>These were not</p> <p>Company should provide evidence of CAFA or tax liability be charged</p>

							recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.		
	VAT	2018	N/A	N/A	NOT SEEN	NIL	No evidence of VAT monitoring		
		2019	N/A	N/A	VAT was recomputed and 193,604,930.00 with interest and penalty as outstanding	193,604,930.00	VAT liability was reassessed and 193,604,930.00.00 was due for payment, but no evidence of payment seen	Company should provide evidence of payment	
		2020	N/A	N/A	VAT was recomputed and 61,746,143.00 as outstanding	61,746,143.00	VAT liability was reassessed and 61,746,143.00 was due for payment, but no evidence of payment seen	Company should provide evidence of payment	
		2021	N/A	N/A	VAT liability was reassessed and the VAT due was 63,003,969.72	63,003,969.72	VAT liability was reassessed and 63,003,969.72 was due for payment, but no evidence of payment seen	Company should provide evidence of payment	
		2020	N/A	N/A	WHT of 9,929,855.00 of some transactions were not deducted and remitted	9,929,855.00	WHT liability was reassessed and 9,929,855.00 was due for payment, but no evidence of payment seen	Company should provide evidence of payment	

				2021	N/A	N/A	WHT of 8,420,926.85 of some transactions were not deducted and remitted	8,420,926.85	WHT liability was reassessed and 8,420,926.85 was due for payment, but no evidence of payment seen	Company should provide evidence of payment	
13	FIRST PATRIOT LTD	19928245-0001	CIT	2018	NONE	NOT SEEN	NIL	Nil	Audited Financial statement not seen	Company should explain why the financial statement not submitted	
				2019	AUDITED FIN STATEMENT	471,203,432.00	NIL	Nil	The Company claimed Capital Allowance of N471,203,432.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
				2020	AUDITED FIN STATEMENT	1,651,144,072.00	NIL	Nil	The Company claimed Capital Allowance of N1,651,144,072.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of	Company should provide evidence of CAFA or tax liability be charged	

							N34,996,567 is considered too high, compared to the N4,989,050 paid last year.		
	2021	AUDITED FIN STATEMENT	751,235,301.00	NIL	Nil		The Company claimed Capital Allowance of N751,235,301.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
	VAT	2018	N/A	N/A	NIL	Nil	No evidence of VAT monitoring	Explnation to be provided on the observation raised	
		2019	N/A	N/A	NIL	Nil	No evidence of VAT monitoring	Explnation to be provided on the observation raised	
		2020	N/A	N/A	NIL	Nil	No evidence of VAT monitoring	Explnation to be provided on the observation raised	
		2021	N/A	N/A	NIL	Nil	No evidence of VAT monitoring	Explnation to be provided on the observation raised	

14	KATES ASSOCIATED IND LTD	00055131-0001	CIT	2018	AUDITED FIN STATEMENT	43,805,406.00	NIL	NIL	The Company claimed Capital Allowance of N43,805,406.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged
				2019	AUDITED FIN STATEMENT	32,874,306.00	NIL	NIL	The Company claimed Capital Allowance of N32,874,306.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged

			2020	AUDITED FIN STATEMENT	40,410,901.00	NIL	NIL	The Company claimed Capital Allowance of N40,410,901.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	
			2021	AUDITED FIN STATEMENT	69,153,648.00	NIL	NIL	The Company claimed Capital Allowance of N69,153,648.00 without evidence of Certificate of Acceptance of Fixed Assets (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry ,Trade& Investment. These were not recognized. Professional fee of N34,996,567 is considered too high, compared to the N4,989,050 paid last year.	Company should provide evidence of CAFA or tax liability be charged	

15	VALLEUMBR A FLOUR MILLS NIG. LTD.	01382809- 0001	CIT	2018	AUDITED FIN STATEMENT	2,798,011,969.0 0	TAX INVESTIGATION WAS CARRIED OUT	966,523,264.70	<p>The additional assessment of N127,119,674.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year were yet to be paid by the company. The Capital Allowance of N2,798,011,969.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N839,403,590.70 (i.e. CIT of 30% on N2,798,011,969.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N966,523,264.70 (i.e. N839,403,590.70 plus N127,119,674.00) on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N966,523,264.70 (i.e. N839,403,590.70 plus N127,119,674.00) which should be raised against the company on the excess of relief claimed.</p>
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			2019	AUDITED FIN STATEMENT	95,826,393.00	TAX INVESTIGATION WAS CARRIED OUT	50,512,456.60	<p>The additional assessment of N21,764,538.60 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N95,826,393.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N28,747,917.90 (i.e. CIT of 30% on N95,826,393.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N50,512,456.60 (i.e. N28,747,917.90 plus N21,764,538.60) on the excess of relief claimed.</p>	The Company should be made to pay additional tax liability of N50,512,456.60 (i.e. N28,747,917.90 plus N21,764,538.60) as a result of Tax Investigation findings on CIT for the 2019 Assessment year.
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			2020	AUDITED FIN STATEMENT	230,887,117.00	TAX INVESTIGATION WAS CARRIED OUT	79,288,681.60	<p>The additional assessment of N10,022,546.50 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N230,887,117.00 claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N69,266,135.10 (i.e. CIT of 30% on N230,887,117.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N79,288,681.60 (i.e. N69,266,135.10 plus N10,022,546.50) on the excess of relief claimed.</p>	<p>The Company should be made to pay additional tax liability of N79,288,681.60 (i.e. N69,266,135.10 plus N10,022,546.50) as a result of Tax Investigation findings on CIT for the 2020 Assessment year.</p>
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			2021	AUDITED FIN STATEMENT	2,334,360,612.00	DESK REVIEW WAS CONDUCTED	712,525,520.70	<p>The additional assessment of N12,217,337.10 raised on the Company by the FIRS as per Tax Demand Notice on CIT for the 2021 Assessment year, were yet to be paid by the company.</p> <p>The Capital Allowance of N2,334,360,612.00 claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N700,308,183.60 (i.e CIT 30% of N2,334,360,612.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N712,525,520.70 (i.e. N700,308,183.60 plus N12,217,337.10) on the excess of relief claimed.</p>	<p>he Company should be made to pay additional tax liability of N712,525,520.70 (i.e. N700,308,183.60 plus N12,217,337.10) on the excess of relief claimed for 2021 Assessment year.</p>
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			VAT	2018	AUDITED FIN STATEMENT	N/A	DESK REVIEW	1,732,144.00	The additional assessment of N1,732,144.00 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2018 Assessment year were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N1,732,144.00 for the 2018 Assessment year.	
				2019	AUDITED FIN STATEMENT	N/A	DESK REVIEW	1,121,402.00	The additional assessment of N1,121,402.00 raised on the Company by the FIRS as per the VAT Re-assessment notice for the 2019 Assessment year were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N1,121,402.00 for the 2019 Assessment year.	
				2020	AUDITED FIN STATEMENT	N/A	DESK REVIEW	65,711,297.25	The additional assessment of N65,711,297.25 raised on the Company by the FIRS as per the VAT Ref No: FIRS/LTO/AWKA/0138282 8090001 dated on 24/08/2022, were still outstanding and - assessment notice for the 2020 Assessment year were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N65,711,297.25 for the 2020 Assessment year.	
				2021	AUDITED FIN STATEMENT	N/A	DESK REVIEW	39,466,695.71	The additional assessment of N39,466,695.71 raised on the Company by the FIRS as per the VAT Re-assessment notice for the	The Company should be made to pay additional VAT liability of N39,466,695.71 for the 2021 Assessment year.	

							2021 Assessment year Via Ref No: FIRS/LTO/AWKA/0138282 8090001 dated on 24/08/2022, were still outstanding and yet to be paid by the company.		
	EDT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	119,628.00	<p>The additional assessment of N119,628.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N119,628.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	
		2019	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	40,039.00	<p>The additional assessment of N40,039.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N40,039.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.	

			2020	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	689,092.00	<p>The additional assessment of N689,092.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year via Assessment No: TID/SD/EDT/0010 dated 2nd September, 2022, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N689,092.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.
			2021	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	814,489.16	<p>The additional assessment of N814,491.16 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N814,489.16 raised on the Company by the FIRS as per the Desk Review on Education Tax due for the 2021 Assessment year.

			WHT	2018	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,931,565.00	The additional amount of N1,931,565 .00 was raises on the Company by the FIRS to pay WHTax due for 2018 assessment year were yet to be paid by the company. The Company should be made to pay the tax liability as reflected above.	The Company should be made to pay the additional assessment of N1,931,565 .00 was raises on the Company by the FIRS to pay WHTax due for 2018 assessment year.
				2019	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	1,739,269.00	The additional amount of N1,739,269.00 was raises on the Company by the FIRS to pay WHTax due for 2019 assessment year were yet to be paid by the company. The Company should be made to pay the tax liability as reflected above.	The Company should be made to pay the additional assessment of N1,739,269.00 was raises on the Company by the FIRS to pay WHTax due for 2019 assessment year.
16	RELIABLE STEEL & PLASTIC LTDRELIABLE	00233455 4-0001	CIT	2018	AUDITED FIN STATEMENT	240,423,578.00	TAX INVESTIGATION WAS CARRIED OUT	235,310,271.90	The additional assessment of N163,183,198.50 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year via Assessment No: LTO/AWK/CIT/-INV/030 AD of 4/6/2021, dated 4th/06/ 2021, were yet to be paid by the company.	The Company should be made to pay additional tax liability of N235,310,271.90 (i.e N72,127,073 plus N163,183,198.50) on the excess of relief claimed.

								<p>The Capital Allowance of N240,423,578.00 claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N72,127,073.40 (i.e. CIT of 30% on N240,423,578.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N235,310,271.90 (i.e. N72,127,073 plus N163,183,198.50) on the excess of relief claimed.</p>	
			2019	AUDITED FIN STATEMENT	150,484,233.00	TAX INVESTIGATION WAS CARRIED OUT	236,127,224.20	<p>The additional assessment of N190,981,954.30 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No: LTO/AWK/CIT/-INV/029 AD Of 4/6/2021, dated</p>	<p>The Company should be made to pay additional tax liability of N236,127,224.20 (i.e N45,145,269.90 plus N190,981,954.30) on the excess of relief claimed.</p>

								<p>4th June, 2021, were yet to be paid by the company.</p> <p>The Capital Allowance of N150,484,233.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N45,145,269.90 (i.e. CIT of 30% on N150,484,233.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N236,127,224.20 (i.e. N45,145,269.90 plus N190,981,954.30) on the excess of relief claimed.</p>	
			2020	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	6,000,000.00	<p>The additional assessment of N6,000,000.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2020 Assessment year via Assessment No:FIRS/LTO/AWK/23345</p>	<p>The Company should be made to pay additional tax liability of N6,000,000.00 on the excess of relief claimed.</p>

							0001/22/04, dated 30th March, 2022, were yet to be paid by the company.		
							TNo Capital Allowance of claimed by the Company in 2021 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should not be subjected to tax additional Tax liability,		
							In total, the Company should be made to pay additional tax liability of N120,050,584.00 on the excess of relief claimed as outstanding		
	VAT	2018	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING	NIL	No VAT Monitoring exercise was carried out in the period under review.	VAT Monitoring exercise should be conducted for the period under review.	
		2019	AUDITED FIN STATEMENT	N/A	DESK REVIEW	39,055,067.00	The additional assessment of N39,055,067.00 raised on the Company by the FIRS as per the VAT Ref No: FIRS/LTAW/00233454-0001/23/02 dated on 6TH June2019,were still outstanding and -	The Company should be made to pay additional VAT liability of N39,055,067.00 for the 20219Assessment year.	

							assessment notice for the 2019 Assessment year were yet to be paid by the company.		
			2020	AUDITED FIN STATEMENT	N/A	DESK REVIEW	116,621,440.00	The additional assessment of N116,621,440.00 raised on the Company by the FIRS as per the VAT Ref No: FIRS/LTAW/00233454-0001/23/02 dated on 6TH June 2020, were still outstanding and - assessment notice for the 2020 Assessment year were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N116,621,440.00 for the 2020 Assessment year.
			2021	AUDITED FIN STATEMENT	N/A	DESK REVIEW	112,908,822.13	The additional assessment of N112,908,822.13 raised on the Company by the FIRS as per the VAT Ref No: FIRS/LTAW/00233454-0001/23/02 dated on 5TH Junly 2023, were still outstanding and - assessment notice for the 2021 Assessment year were yet to be paid by the company.	The Company should be made to pay additional VAT liability of N112,908,822.13 for the 2021 Assessment year.

			EDT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	306,420.00	<p>The additional assessment of N306,420.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N306,420.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year.</p>	
				2019	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	15,112,726.66	<p>The additional assessment of N15,098,334.88 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year via Assessment No:LTO/AWK/ET/-INV/032 AD OF 4/6/2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N15,112,726.66 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2019 Assessment year.</p>	

			2020	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	15,098,334.88	<p>The additional assessment of N15,098.334.88 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year via Assessment NoLTO/AWK/ET/-INV/031AD OF 4/6/2021:, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N15,098,334.88 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2020 Assessment year.	
			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	507,900.00	<p>The administrative assessment of N507,900.00 was raised on the Company by the FIRS on EDT for the 2021 Assessment year via letter Reference No: (FIRS/LTAW/00233454-0001/22/03), dated 15th February, 2022, which were yet to be paid by the company.</p>	The Company should be made to pay the assessment liability of N507,900.00 on EDT arising from delay in filing 2021 Audited Financial Statement for 2021 year of Assessment.	
		WHT	2018	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	NIL	NIL	NIL	

				2020	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS CARRIED OUT	747,050.00	<p>The amount of N747,050.00 raised in Demand Notice with Reference Number:(FIRS/LTAW/002 33454-0001/22/03) date on 5th July,2023 against the Company by the FIRS for failure to pay WHTax on the due date were yet to be paid by the company.</p> <p>The Company should be made to pay the tax liability as reflected above.</p>	The Company should be made to pay the sum of N1,811,225.00 raised in the Demand Notice with Reference number: LTO/AWK/WHT-INV/123 dated 5th October, 2021, against the Company by the FIRS for failure to pay WHTax on the due date.
				2021	AUDITED FIN STATEMENT	N/A	NO TAX INVESTIGATION WAS CARRIED OUT	NIL	No Tax investigation was carried out in the period under review.	No Tax investigation was carried out in the period under review.
17	AQUA RAPHA INVESTMENT NIG. LTD	0245733-0001	CIT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	14,747,037.82	<p>The additional assessment of N14,747,037.82 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2018 Assessment year were yet to be paid by the company.</p> <p>No Capital Allowance of claimed by the Company in 2018 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the</p>	The Company should be made to pay additional tax liability of N14,747,037.82 on the excess of relief claimed.

							Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be not be subjected to tax additional Tax liability, In total, the Company should be made to pay additional tax liability of N14,747,037.82 on the excess of relief claimed as out standing	
			2019	AUDITED FIN STATEMENT	1,09,064,000.00	TAX INVESTIGATION WAS CARRIED OUT	1,604,320,200.00	The additional assessment of N1,275,801,000.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year via Assessment No:, were yet to be paid by the company. The Capital Allowance of N1,095,064,000.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, The Company should be made to pay additional tax liability of N1,604,320,200.00 (i.e. N328,519,200.00 plus1,275,801,000.00) the excess of relief claimed.

							<p>this sum should be subjected to tax which will amount to N328,519,200.00 (i.e. CIT of 30% on N1,095,064,000.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,604,320,200.00 (i.e. N328,519,200.00 plus N1,275,801,000.00) on the excess of relief claimed.</p>			
				2020	AUDITED FIN STATEMENT	1,321,283,223.00	TAX INVESTIGATION WAS CARRIED OUT	1,859,758,189.90	<p>The additional assessment of N1,463,373,223.00 raised on the Company by the FIRS as per Tax Investigation findings on CIT for the 2019 Assessment year were yet to be paid by the company.</p> <p>The Capital Allowance of N1,321,283,223.00 claimed by the Company in 2019 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade</p>	<p>The Company should be made to pay additional tax liability of N1,859,758,189.90 (i.e. N396,384,966.90 plus N1,463,373,223.00) on the excess of relief claimed.</p>

							<p>&Investment and hence, this sum should be subjected to tax which will amount to N 396,384,966.90(i.e. CIT of 30% on N1,321,283,223.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N1,859,758,189.90 (i.e. N396,384,966.90 plus N1,463373,223,.00) on the excess of relief claimed.</p>		
	VAT	2018	AUDITED FIN STATEMENT	N/A	TAX INVESTIGATION WAS NOT CARRIED OUT	NIL	NIL	NIL	
		2019	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CARRIED OUT	26,609,300.66	The additional assessment of N26,609,300.66 was raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019 Accounts, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N26,609,300.66 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019.	

				2020	AUDITED FIN STATEMENT	N/A	TAX AUDIT WAS CARRIED OUT	15,000.00	The additional assessment of N15,000.00 was raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2020 Accounts, were yet to be paid by the company.	The Company should be made to pay the additional tax liability of N15,000.00 raised against the Company by the FIRS on VAT as a result of Tax Audit conducted for 2017 - 2019.	
				2021	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING WAS CARRIED OUT	NIL	NIL	NIL	
			EDT	2018	AUDITED FIN STATEMENT	NIL	TAX INVESTIGATION WAS CARRIED OUT	787,006.00	The additional assessment of N787,006.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year were yet to be paid by the company. The Company should be made to pay additional tax liability as reflected above.	The Company should be made to pay the additional assessment of N787,006.00 raised on the Company by the FIRS as per Tax Investigation findings on Education Tax due for the 2018 Assessment year.	
18	AFRO-ASIA-AUTOMOBILE PLASTICS LTD	017777568-0001	CIT	2018	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	NIL	NIL	NIL	
				2020	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	3,500,000.00	The additional assessment of N3,500,000.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2020 Assessment year via	The Company should be made to pay additional tax liability of N153,893,568.14 (i.e. N148,163,568.14 plus N5,730,000.00) on the excess of relief claimed.	

								<p>Assessment No: LTO,AWK/CIT/05, dated on 25th January,2020 were yet to be paid by the company.</p> <p>No Capital Allowance was claimed by the Company in 2020 YOA was without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this subjected to tax additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N on the excess of relief claimed.</p>	
		2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	NIL	NIL	NIL	
	VAT	2018	AUDITED FIN STATEMENT	N/A	DESK REVIEW	6,250.00	The additional assessment of N6,250.00was raised against the Company by the FIRS on VAT penalty for late submission of VAT as a result of Desk Review conducted on 2018 for not meeting up with due date of file returns that attract computation of interest	The Company should be made to pay the additional tax liability of interest and penalty of N6,250.00 raised against the Company by the FIRS on VAT as a result of Desk Review conducted on 2018 on VAT matter via a letter dated 8th	

							and penalty since they did not pay within the stipulated time via a letter dated 8th August, 2018, of which the sum of N6,25.00 should be paid by the company. Interest on N5000.00 @ 15% i.e N750 @ 10% i.e N500 In total N6,250.00 (N750.00 plus N500 plus N5000)	August, 2018.	
		2019	AUDITED FIN STATEMENT	N/A	NO VAT MONITORING WAS CARRIED OUT	NIL	NIL	NIL	
		2020	AUDITED FIN STATEMENT	N/A	DESK REVIEW WAS CARRIED OUT	2,959,829.00	The additional assessment of N2,959,829.00 was raised against the Company by the FIRS on VAT as a result of Desk Review conducted on 2020 assessment year via a letter dated 8th November,2021. The Company should paid the additional liability as reflected above.	The Company should be made to pay the additional tax liability of N2,959,829.00 raised against the Company by the FIRS on VAT as a result of Desk Review conducted on 2020	
	EDT	2018	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	NIL	NIL	NIL	
		2020	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CARRIED OUT	150,000.00	The additional assessment of N150,000.00 raised on the Company by the FIRS as per the Desk Review	The Company should be made to pay the additional assessment of N150,000.00 raised on the Company by	

									<p>on Education Tax due for the 2020 Assessment year via Assessment No: LTO/AWK/ED/06, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>the FIRS as per the Desk Review on Education Tax due for the 2020 Assessment year.</p>
19	J.I EJISON INTERNATIONAL LTD	10011555 1-0001	CIT	2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	1,689,478.50	<p>The additional assessment of N1,689,478.50 raised on the Company by the FIRS as per the Desk Review on CIT for the 2018 Assessment year via Assessment statement of Tax position FORM (RPPU) ONSA 131 dated on 21st march, 2017 were yet to be paid by the company.</p> <p>No Company claimed Capital Allowance was claim in the 2018 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be</p>	<p>The Company should be made to pay additional tax liability of CIT N1,689,478.50 on the excess of relief claimed.</p>

							subjected to tax additional Tax liability as stated above		
			2019	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	1,000,000.00	<p>The additional assessment of N1,000,000.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2018 Assessment year via Assessment NO:FIRS/ONT-MSTO/00115551-001 dated on 23rd July, 2019, were yet to be paid by the company.</p> <p>No Capital Allowance claim by the Company in the 2019 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should not be subjected to Tax liability should be paid as reflected above.</p>	The Company should be made to pay additional tax liability of CIT N1,000,000.00 on the excess of relief claimed.
			2020	AUDITED FIN STATEMENT	13,710,400.00	TAX AUDIT WAS CARRIED OUT	8,366,006.00	The additional assessment of N4,252,866.00 raised on the Company by the FIRS as per the Desk Review	The Company should be made to pay additional tax liability of N8,366,006.00 (i.e N4,113,120.00 plus N4,252,886.00) on the excess of relief

								<p>on CIT for the 2020 Assessment year, were yet to be paid by the company.</p> <p>The Company claimed Capital Allowance of N13,710,400.00 in the 2020 YOA without evidence of Certificate of Acceptance of Fixed Asset (CAFA) from the Industrial Inspectorate Division (IID) of Ministry of Industry, Trade & Investment and hence, this sum should be subjected to tax which will amount to N4,113,120.00 (i.e. CIT of 30% on N13,710,400.00) additional Tax liability.</p> <p>In total, the Company should be made to pay additional tax liability of N8,366,006 (i.e. N4,113,120.00 plus N4,252,886.00) on the excess of relief claimed. additional Tax liability.</p>	<p>claimed.</p>
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			2021	AUDITED FIN STATEMENT	NIL	DESK REVIEW WAS CONDUCTED	48,250,000.00	<p>The additional assessment of N48,250,000.00 raised on the Company by the FIRS as per the Desk Review on CIT for the 2021 Assessment year via Assessment NO: LTOAWK/RPP/0011555-001/001/2021, dated on 7TH September, 2021, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay additional tax liability of N48,250,000.00 raised on the Company by the FIRS as per the Desk Review conducted on the Company Income Tax due for the 2021 Assessment year.
	VAT		2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	NIL	NIL	NIL
			2019	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	600,000.00	<p>The additional assessment of N600,000.00 raised on the Company by the FIRS as per the Tax Audit on Value Added Tax due for the 2019 Assessment year via Assessment No:FIRS/ONT-MSTO/00115551-001, dated 23rd July, 2019, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	The Company should be made to pay the additional assessment of N600,000.00 raised on the Company by the FIRS as per the Tax Audit conducted on Value Added Tax due for the 2021 Assessment year.

			EDT	2018	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	337,895.70	<p>The additional assessment of N337,895.70 Raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2018 Assessment year via Assessment No: ONSA/ET/129 , dated 21st March, 2017, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N337,895.70 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2018 Assessment year.</p>	
				2019	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	200,000.00	<p>The additional assessment of N200,000.00 Raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2018 Assessment year via Assessment No: :FIRS/ONT-MSTO/00115551-001, dated 23rd July, 2019, were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N200,000.00 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2019 Assessment year.</p>	

				2020	AUDITED FIN STATEMENT	NIL	TAX AUDIT WAS CARRIED OUT	599,012.00	<p>The additional assessment of N599,0120.00 Raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2020 Assessment year , , were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N599,012.00 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2020 Assessment year.</p>	
				2021	AUDITED FIN STATEMENT	NIL	NO DESK REVIEW CONDUCTED	3,000,000.00	<p>The additional assessment of N3,000,000.00 Raised on the Company by the FIRS as per the Tax Audit on Education Tax due for the 2021 Assessment year via assessment No: LTO/AWK/RPP/0011555-0001/001/2021, dated on 7th September, 2021 were yet to be paid by the company.</p> <p>The Company should be made to pay additional tax liability as reflected above.</p>	<p>The Company should be made to pay the additional assessment of N3,000,000.00 raised on the Company by the FIRS as per the Tax Audit conducted on Education Tax due for the 2021 Assessment year.</p>	

20	EASTCHASE ALUMINIUM PRODUCTS LIMITED	00349412- 0001	CIT	2018	F/S Submitted	100,721,917.00	Additional/amended assessment	53,651,612.70	CAFA was not attached in the file, but N100,721,917 was given as capital allowance for that year that brought down the company's Total assessible profit to N78,116,792, the document with Ref no. LTO/AWK/CT-AUD/067 showed that the Sum of N18,323,851.00 was already assessed but the evidence of payment was not traced either in the payment report provided to us or file of the company maintained by the Service.	The accounting officer is requested to: 1. justify the non filling of CAFA in the file, 2. justify why the sum of N100,721,917.00 be allowed as capital allowance. 3. provide evidence for the remittance of N18,323,851.00 in to the designated account. 4. recover the sum of outstanding Tax of N53,651,612.70 from the company in the absence of evidence of CAFA
				2019	F/S Submitted	159,557,319.00	Additional/amended assessment	64,085,403.70	CAFA was not attached in the file, but N159,557,319 was given as capital allowance for that year that brought down the company's Total assessible profit to N54,060,692.00, the document with Ref no. LTO/AWK/CT-AUD/068 showed that the Sum of N14,436,198.00 was already assessed but the evidence of payment was not traced either in the payment report provided to us or file of the	The accounting officer is requested to: 1. justify the non filling of CAFA in the file, 2. justify why the sum of N159,557,319.00 be allowed as capital allowance. 3. provide evidence for the remittance of N14,436,198.00 in to the designated account. 4. recover the sum of outstanding Tax of N64,085,403.70 from

						company maintained by the Service.	the company in the absence of evidence of CAFA	
		2020	F/S Submitted	50,063,453.00	Promax used	22,791,658.00	Minimum Tax computation adopted using Taxpromax and the CIT was not paid by the company, CAFA was not sighted in the company's file maintained by the LTO	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N22,791,658.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us
		2021	F/S Submitted	32,001,310.00	Promax used	14,936,873.00	Minimum Tax computation adopted using Taxpromax and the CIT was not paid by the company, CAFA was not sighted in the company's file maintained by the LTO	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N14,936,873.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us in the absence of CAFA.
	VAT	2018						

			2019	Financial Statement not submitted	-	VAT Re-Assessment	5,633,779.00	the total amount of VAT payable via VAT Re-Assessment Notice with Ref. No FIRS/LTAP/LTAN/AA/2019 /VAT/0000872 was N14,333,779.00 between January to December 2019 but N8,700,000.00 was amount already paid resulting to an outstanding of N5,633,779.00	The accounting officer is requested to: 1. Recover the outstanding VAT of N5,633,779.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.	
			2020	Financial Statement not submitted	-	VAT Re-Assessment	10,225,200.00	the total amount of VAT payable via VAT Re-Assessment Notice with Ref. No LTO/AWK/V/009 dated 31/03/2022 was N25,825,200.00 between January to December 2020 but N15,600,000.00 was amount already paid resulting to an outstanding of N10,225,200.00	The accounting officer is requested to: 1. Recover the outstanding VAT of N10,225,200.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.	
			2021	Financial Statement not submitted	-	VAT Re-Assessment	17,571,900.00	the total amount of VAT payable via VAT Re-Assessment Notice with Ref. No LTO/AWK/V/010 dated 31/03/2022 was N21,471,900.00 between January to December 2021 but N3,900,000.00 was amount already paid resulting to an outstanding of N17,571,900.00	The accounting officer is requested to: 1. Recover the outstanding VAT of N17,571,900.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.	

			EDT	2018						
				2019	Financial Statement not submitted	159,557,319.00	Additional/amended assessment	1,721,501.00	the additional Tax liability was as a result of Additional/Amended Assessment via assessment Ref no. LTO/AWK/ET-AUD/070 dated 18/8/2021, which the EDT arrived at was N4,272,361.00 but N2,550,860.00 was already assessed leaving a Tax due of N1,721,501.00	The accounting officer is requested to: 1. Recover the outstanding EDT of N1,721,501.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.
				2020	Financial Statement not submitted	50,063,453.00	Promax used	1,925,860.00	Minimum Tax computation adopted using Taxpromax and the Education Tax was not paid by the company, Financial Statement and CAFA were not sighted in the company's file maintained by the LTO	The accounting officer is requested to: 1. Recover the outstanding EDT of N1,925,860.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.
				2021	Financial Statement not submitted	32,001,310.00	Promax used	1,098,260.00	Minimum Tax computation adopted using Taxpromax and the Education Tax was not paid by the company, Financial Statement and CAFA were not sighted in the company's file maintained by the LTO	The accounting officer is requested to: 1. Recover the outstanding EDT of N1,098,260.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.

			WHT	2018	Financial Statement not submitted	N/A		850,000.00	N850,000.00 was outstanding WHT liability as a result of WHT audit assessment via document sighted with Ref No. LTO/AWK/WT-AUD/074 dated 18/8/2021 in the 2021 YOA WHT ledger	The accounting officer is requested to: 1. Recover the outstanding WHT of N850,000.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.
				2019	Financial Statement not submitted	N/A		1,080,000.00	N850,000.00 was outstanding WHT liability as a result of WHT audit assessment via document sighted with Ref No. LTO/AWK/WT-AUD/074 dated 18/8/2021 in the 2021 YOA WHT ledger	The accounting officer is requested to: 1. Recover the outstanding WHT of N1,080,000.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us.
21	TEMPOGATE OIL & GAS ENERGY CO. LTD	02446844-0001	CIT	2018	Financial Statement not submitted	Nil	No evidence of desk review	Nil	There was no financial statement submitted, for the year under review, no evidence of Desk review conducted, and no evidence of payment of Company Income Tax or evidence of CAFA attached in the file for the periods under review.	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N22,791,658.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us

				2019	Financial Statement not submitted	Nil	No evidence of desk review	Nil	There was no financial statement submitted, for the year under review, no evidence of Desk review conducted, and no evidence of payment of Company Income Tax or evidence of CAFA attached in the file for the periods under review.	The accounting officer is requested to: 1. justify the non filling of of documents indicating assessable and Tax liability of the company during the period under review. 2. Provide us with all the necessary documents such as Financial Statements, Tax assesement returns and evidence of Desk review and payment of appropriate Tax in to the appropriate Tax account.
				2020	Financial Statement not submitted	Nil	No evidence of desk review, but a demand notice raised	47,819,013.70	A demand notice of N47,819,013.70 was raised with reference number LTO/AWK/CT-DN/017 dated 15/2/2022 for 2020 YOA. There was no financial statement submitted, for the year under review, no evidence of Desk review conducted, and no evidence of payment of Company Income Tax or evidence of CAFA attached in the file for the periods under review.	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N47,819,013.70 from the company and pay in to the service account, with evidence of recovery and payment provided to us

			2021	Financial Statement not submitted	Nil	No evidence of desk review, but a demand notice raised	68,312,876.71	A demand notice of N68,312,876.71 was raised with reference number LTO/AWK/CT-DN/016 dated 15/2/2022 for 2021 YOA. There was no financial statement submitted, for the year under review, no evidence of Desk review conducted, and no evidence of payment of Company Income Tax or evidence of CAFA attached in the file for the periods under review.	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N68,312,876.71 from the company and pay in to the service account, with evidence of recovery and payment provided to us
		VAT	2018				nil	there was Nil VAT payable for the months of January 2018 to December, 2018.	The accounting officer is requested to: 1. justify the non filling of VAT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory VAT during the period under review.

						2019				nil	there was Nil VAT payable for the months of January 2019 to December, 2019.	The accounting officer is requested to: 1. justify the non filling of VAT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory VAT during the period under review.	
						2020				nil	there was Nil VAT payable for the months of February 2020, July to December, 2020 and there was no evidence of VAT filling for the months of January, March, April, May and June 2020.	The accounting officer is requested to: 1. justify the non filling of VAT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory VAT during the period under review.	
						2021				NIL	there was Nil VAT payable for the month of January and February 2021 and there was no evidence of VAT filling for the months of March to December, 2021.	The accounting officer is requested to: 1. justify the non filling of VAT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory VAT during the period under review.	
						EDT	2018						

			2019	Financial Statement not submitted	N/A	Demand Notice raised without evidence of of desk review	4,354,191.78	a demand notice was raised on 15/2/2022, in respect of 2019 YOA Education Tax via Demand notice reference number LTO/AWK/ET-DN/019, but evidence of payment was not traced for the outstanding liabilities, Fianancial Statement was not attached in the filed reviewed to ascertain the extend of compliance with the assessment of the Education Tax for the period under review	The accounting officer is requested to: 1. Recover the outstanding EDT of N4,354,191.78 from the company and pay in to the service account, with evidence of recovery and payment provided to us.
			2020	Financial Statement not submitted	N/A	Demand Notice raised without evidence of of desk review	6,531,287.67	Administrative assessment OF N6,000,000.00 was made via document ref no. FIRS/LTO/RPP/AWK/0244 6844-0001/1/2021 dated 10/12/2021, but evidence of payment was not traced for the outstanding liabilities, demand notice of N6,531,287.67 was raised on 15/2/2022, in respect of 2020 YOA Education Tax via Demand notice reference number LTO/AWK/ET-DN/020 Fianancial Statement was not attached in the filed reviewed to ascertain the extend of compliance with the assessment of the	The accounting officer is requested to: 1. Recover the outstanding EDT of N6,531,287.67 from the company and pay in to the service account, with evidence of recovery and payment provided to us.

							Education Tax for the period under review	
			2021	Financial Statement not submitted	N/A	Demand Notice raised without evidence of of desk review	8,708,383.56	<p>a demand notice of N8,708,383.56 was raised on 15/2/2022, in respect of 2021 YOA Education Tax via Demand notice reference number LTO/AWK/ET-DN/021, administrative assessment was also made via document ref no. FIRS/LTO/RPP/AWK/0244 6844-0001/1/2021 dated 10/12/2021, but evidence of payment was not traced for the outstanding liabilities, Fianancial Statement was not attached in the filed reviewed to ascertain the extend of compliance with the assessment of the Education Tax for the period under review</p> <p>The accounting officer is requested to: 1. Recover the outsanding EDT of N8,708,383.56 from the company and pay in to the service account, with evidence of recovery and payment provided to us.</p>

			WHT	2018	N/A	N/A	no desk review	nil	there was no desk review of WHT	The accounting officer is requested to: 1. justify the non filling of WHT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory WHT during the period under review.	
				2019	No single document in the file	NIL	NIL	NIL	There was no single document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of WHT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory WHT during the period under review.	
				2020	No single document in the file	NIL	NIL	NIL	There was no single document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of WHT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory WHT during the period under review.	

				2021	No single document in the file	NIL	NIL	NIL	There was no single document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of WHT returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory WHT during the period under review.
22	JUDDY-BOLEMA INDUSTRIES LIMITED	17643852-001	CIT	2018	NONE		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.
				2019	NONE		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.

			2020	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
			2021	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
		VAT	2018	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	

				2019	NONE	N/A		29,422,543.04	Demand notice of N29,422,543.04 via reference number EMTO/VAT/Adm demand notice no. 4 of	The accounting officer is requested to: 1. recover and pay the sum of N29,422,543.04 in to the appropriate revenue account from the company and evidence of recovery and payment be provided to us.
				2020	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.
				2021	NONE	N/A	yes	70,023,492.13	the sum of N70,023,492.13 was outstanding as a result of the re-assessment shown on document reference No. FIRS/LTO-Awk/17643852-0001/2021/55 dated 5/10/2021	The accounting officer is requested to: 1. recover and pay the sum of N70,023,492.13 in to the appropriate revenue account from the company and evidence of recovery and payment be provided to us.

			EDT	2018	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
				2019	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
				2020	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	

			2021	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
		WHT	2018	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
			2019	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	

				2020	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
				2021	NO		NO INFO	NO	There was no relevant document in the file presented for the period under review	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	

23	COSCHARIS FARMS LIMITED	01928048-0001	CIT	2018	F/S Submitted	1,686,926,390.00	no, self assessment	-	the Capital allowance brought forward was Nil, Capital allowance for the year was N1,678,913,490.00 and Investment allowance of N8,012,900.00 as per the company Tax computation for 2018 YOA no desk review and financial statement attached, but N102,569.00 was paid as company income tax, on 8/2/2018 via payment reference number FBP/FIRS/8-02-2018/505355, N134,403.00 on 8/2/2018 via ref no. FBP/FIRS/8-02-2018/505420 Capital income Tax, N175,000.00 ON 8/2/2018 Via ref no. FBP/FIRS/8-02-2018/505479 as Company Income Tax.	The accounting officer is requested to: 1. Justify the non desk review and tax audit for the company that charged capital allowance of N1,686,926,390.00 without evidence of CAFA. 2. conduct desk review and TAX audit on the company to justify its claim of reporting a loss during the period under review.
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			2019	F/S Submitted	511,019,800.00	No information in the file	-	the Capital allowance brought forward was N1,686,926,390.00, Capital allowance for the year was N508,371,100.00 and Investment allowance of N2,648,700.00 as per the company Tax computation for 2019 YOA, and no CAFA was attached to justify the claim, the declared a nil taxable profit/loss for the year,	The accounting officer is requested to: 1. Justify the non desk review and tax audit for the company that charged capital allowance of N511,019,800.00 without evidence of CAFA. 2. conduct desk review and TAX audit on the company to justify its claim of reporting a loss during the period under review.
			2020	F/S Submitted	2,147,819,855.00	no information attached	-	Capital allowance brought forward was N2,197,946,190.00, Capital allowance for the year was N1,923,976,455.00 and Investment allowance of N223,843,400 as per the company Tax computation for 2020 YOA, and no CAFA was attached to justify the claim, the declared a nil taxable profit/loss for the year, RRR of N7,109,600.00 in respect of Company Income Tax attached with RRR Number 1305-8690-3996 dated 8/12/2021 for the	The accounting officer is requested to: 1. Justify the non desk review and tax audit for the company that charged capital allowance of N2,147,819,855.00 without evidence of CAFA. 2. conduct desk review and TAX audit on the company to justify its claim of reporting a loss during the period under review.

								<p>Tax period of 2020, a payment reference slip of N7,109,600.00 was also attached with Transaction number 03211208461247 dated 2021/12/08. another pay Direct payment acknowledgement slip of N200,000.00 was also attached with reference number UBA/FIRS/16-02-2021/858258 in respect of Comapny Income Tax without evidence of documents proving how the assessment of the Tax was arrived at.</p>	
			2021	F/S Submitted		No infomation in the file		<p>there was no infomation in respect of Company Income Tax in the file for the year under review.</p>	<p>The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2.provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.</p>

			WHT	2018	F/S Submitted	N/A	Tax audit	994,203.00	WHT payable as a result of Tax audit exercise via letter ref no.FIRS/AMSTA/2021/04/01928048-0001 dated 18/2/2022	The accounting officer is requested to: 1. recover and pay the sum of N994,203.00 as WHT in to the appropriate revenue account from the comapny and evidence of recovery and payment be provided to us.
				2019	F/S Submitted	N/A	Tax audit	2,638,994.02	WHT payable as a result of Tax audit exercise via letter ref no.FIRS/AMSTA/2021/04/01928048-0001 dated 18/2/2022	The accounting officer is requested to: 1. recover and pay the sum of N2,638,994.02 as WHT in to the appropriate revenue account from the comapny and evidence of recovery and payment be provided to us.
				2020	F/S Submitted	N/A	Tax audit	1,880,085.00	WHT payable as a result of Tax audit exercise via letter ref no.FIRS/AMSTA/2021/04/01928048-0001 dated 18/2/2022	The accounting officer is requested to: 1. recover and pay the sum of N1,880,085.00 as WHT in to the appropriate revenue account from the comapny and evidence of recovery and payment be provided to us.

				2021	F/S Submitted	N/A	no information available in respect of WHT in the file reviewed		no available records in respect of WHT in the file reviewed	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	
				2021							
24	ZHONGTAIN Construction Nigeria Ltd	16262281-0001	CIT	2018	F/S Submitted	59,151,900.00	no evidence	17,745,570.00	N59,151,900.00 was charged as capital allowance without CAFA,	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N17,745,570.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us	

				2019	F/S Submitted	4,174,032.00	no evidence	18,132,600.00	capital allowance of N4,174,032.00 was charged as capital allowance without CAFA, and reported N56,267,968.01 as taxable profit after deduction of capital allowance, evidence of payment of Company Income Tax to the service.	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N18,132,600.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us
				2020	F/S Submitted	108,000.00	Taxpromax	10,346,345.00	Financial Statement not attached, no evidence of CAFA to justify the capital allowance, only Taxpromax report attached in the file, N10,346,345.00 was not paid as per payment report provided to us	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N10,346,345.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us

			2021	No Financial Statement in the file	40,500.00	Taxpromax	57,505,303.00	Financial Statement not attached, no evidence of CAFA to justify the capital allowance, only Taxpromax report attached in the file, N57,505,303.00 was not paid as per payment report provided to us	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N10,346,345.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us	
		VAT	2018	No Financial Statement in the file	N/A	no		no available records attached in the file	The accounting officer is requested to: 1. justify the non filling of TAX returns during the period under review. 2. provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.	

			2019	No Financial Statement in the file	N/A	no		only VAT Re-assessment notice of N60,000.00 was attached in the file as penalty on VAT and evidence of payment of the same amount made. there were no further documents attached such as VAT returns for the period and other relevant documents.	The accounting officer is requested to: 1. justify the non filling of sufficient relevants documents in respect of VAT during the period under review. 2.provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.
			2020	No Financial Statement in the file	N/A	no	-	only september and november 2020 VAT Return was filed in the file having nils VAT payable for the period	The accounting officer is requested to: 1. justify the non filling of sufficient relevants documents in respect of VAT during the period under review. 2.provide us with sufficient evidence that the company paid the Statutory TAX during the period under review.
			2021						

			WHT	2018		N/A	No	6,779,483.27	no evidence of payment made as indicated on receipt WHT 0609766731, WHT0609766730, 013465DB	The accounting officer is requested to: 1. justify the why that payment was not captured in the payment report provided to us for the period under review 2. provide us with evidence that it was paid into the appropriate revenue account.	
				2019		N/A	no	7,389,567.97	no evidence of payment made as indicated on receipt no 22395196	The accounting officer is requested to: 1. justify the why that payment was not captured in the payment report provided to us for the period under review 2. provide us with evidence that it was paid into the appropriate revenue account.	
				2020							
				2021							

25	ANUDU PLASTICS IND. LTD	01248409- 0001	CIT	2018	F/S Submitted	89,011,057.00	no	26,703,317.10	there was an additional Tax liability resulting from the unapproved capital allowance of N89,011,057.00	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N26,703,317.10 from the company and pay in to the service account, with evidence of recovery and payment provided to us
				2019	F/S Submitted	9,944,081.00	no	2,983,224.30	there was an additional Tax liability resulting from the unapproved capital allowance of N9,944,081.00	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N2,983,224.30 from the company and pay in to the service account, with evidence of recovery and payment provided to us

			2020	F/S Submitted	7,444,081.00	yes	41,853,733.00	administrative assessment OF N41,853,733.00 was made via document ref no. FIRS/LTO/EMTO/ADA/25 of 12/11/2020, but evidence of payment was not traced for the outstanding liabilities,CAFA was not attached in the file reviewed to ascertain the extend of compliance with the assessment of Company Income Tax.	The accounting officer is requested to: 1. justify the non filling of CAFA in the company file. 2. recover the outstanding Tax of N41,853,733.00 from the company and pay in to the service account, with evidence of recovery and payment provided to us
			2021						
	VAT		2018	F/S Submitted	N/A	yes	18,773,630.91	there was a deskreview of VAT for 2018 YOA via documentt ref no. FIRS/EMTO/DE/2020/001 dated 15/10/2020 resulting to an outstanding liability of N18,773,630.91, there was no evidence that the company paid the due VAT	The accounting officer is requested to: 1. recover and pay the sum of N18,773,630.91 as VAT in to the appropriate revenue account from the comapny and evidence of recovery and payment be provided to us.

				2019	F/S Submitted	N/A	no		VAT returns for the month of January, March, April, June, August, October, November and December 2019 were not attached in the file.	The accounting officer is requested to: 1. recover and pay the sums involved that were not attached in the files and also justify the non returns of VAT for the affected months during the period under review and evidence of recovery and payment be provided to us.
				2020	F/S Submitted	N/A	VAT Monitoring	22,221,293.48	VAT amount due as a result of VAT compliance monitoring exercise for the period Jan-Dec 2020 was N22,221,293.48 via document ref no. MTO/VAT/01332201-0001/2021/04/28 dated 20/4/2021 and evidence of payment by the company was not traced in the Tax payment report of the company	The accounting officer is requested to: 1. recover and pay the sum of N22,221,293.48 as VAT in to the appropriate revenue account from the company and evidence of recovery and payment be provided to us.
				2021						
26	RHAS NIGERIA LIMIED	00083409-0001	CIT	2018	AUDITED FIN STATEMENT	452,134,829.00	NO DESK REVIEW	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N452,134,829.00 WAS CLAIMED	Explanation should be provided on the observation raised
				2019	AUDITED FIN STATEMENT	143,090,073.00	SELF ASSESSMENT	9,876,681.64	CAPITAL ALLOWANCE TO THE TUNE OF N1430,90,073.00 WAS CLAIMED	Explanation should be provided on the observation raised

						interest and penalty In (BOJ)		
VAT	2018			BEST OF JUDGEMENT	82,696,080.83	Letter of objection was raised against the taxpayer with reference number FIRS/LTO/RPP/AWK/0008 3409-0001/4/2020 dated 11th November 2020 for the sum N298,544,473.51 for VAT 2017-2020 with interest and penalty In (BOJ)	Explanation should be provided on the observation raised	
	2019			BEST OF JUDGEMENT	86,698,952.25	Letter of objection was raised against the taxpayer with reference number FIRS/LTO/RPP/AWK/0008 3409-0001/4/2020 dated 11th November 2020 for the sum N298,544,473.51 for VAT 2017-2020 with interest and penalty In (BOJ)	Explanation should be provided on the observation raised	
	2020			BEST OF JUDGEMENT	67,131,643.84	Letter of objection was raised against the taxpayer with reference number FIRS/LTO/RPP/AWK/0008 3409-0001/4/2020 dated 11th November 2020 for the sum N298,544,473.51 for VAT 2017-2020 with interest and penalty In (BOJ)	Explanation should be provided on the observation raised	

			EDT	2018			NIL	NIL	NIL		
				2019			SELF ASSESSMENT	1,975,336.33	self assessment was raised against the taxpayer for CIT- N9,876,681.64 and EDT- N1,975,336.33 (SA)	Explanation should be provided on the observation raised	
				2020			BEST OF JUDGEMENT	3,000,000.00	Letter of objection was raised against the taxpayer with reference number FIRS/LTO/RPP/AWK/0008 3409-0001/4/2020 dated 11th November 2020 for the sum N298,544,473.51 for VAT 2017-2020 with interest and penalty In (BOJ)	Explanation should be provided on the observation raised	
			WHT	2018			ADDITIONAL/AMENDED	13,116,246.00	A demand note was raised against the company with reference no. LTO/PHC/F & DE/00083409-0001/2018/02 Dated 31st October 2018 for the sum of N13,116,246.00 on WHT as outstanding Arrears for 2017 YOA No payment of evidence was seen in the taxpayers file	Explanation should be provided on the observation raised	
27	WICH TECH INDUSTRIES LIMITED	00164687-0001	CIT	2018	AUDITED FIN STATEMENT	207,716,298.00	BEST OF JUDGEMENT	1,270,000.00	CAPITAL ALLOWANCE TO THE TUNE OF N207,716,298.00 WAS CLAIMED CIT Tax Assessment for 2018 YOA was raised with the reference no. FIRS/ONT-	Explanation should be provided on the observation raised	

						MSTO/BOJ/164687-0001/01/18 Dated 7th August 2018 on best of judgement against the taxpayer regarding a demand notice for CIT-N1,270,000.00 liability for 2018 YOA				
			2019	AUDITED FIN STATEMENT	147,865,351.00	ADDITIONAL/AMENDED	17,293,249.30	CAPITAL ALLOWANCE TO THE TUNE OF N147,865,351.00 WAS CLAIMED Additional/Amended Assessment was raised against the taxpayer with the Assessment no. LTO/AWK/AD/016 of 09/10/2021 of N17,293,249.00 on CIT 2019 YOA	Explanation should be provided on the observation raised	
			2020	AUDITED FIN STATEMENT	117,449,598.00	TAX INVESTIGATION	19,271,599.00	CAPITAL ALLOWANCE TO THE TUNE OF N117,449,598.00 WAS CLAIMED Additional/Amended Assessment was raised against the taxpayer with the Assessment no. LTO/AWK/AD/017 of 09/10/2020 of N19,271,599.00 on CIT 2020 YOA	Explanation should be provided on the observation raised	
			2021	NIL	NIL	NIL	NIL	NO Financial Statement for the year 2021 YOA	Explanation should be provided on the observation raised	

		VAT	2018			TAX INVESTIGATION	13,375,397.77	Tax Investigation Exercise Assessment was raised for 2018-2019 against the taxpayer with reference no. FIRS/TID/SD/04387668-0001 dated 03/12/2020 of N13,375,397.77 on VAT 2018 YOA	Explanation should be provided on the observation raised	
			2019			TAX INVESTIGATION	13,263,078.95	Tax Investigation Exercise Assessment was raised for 2018-2019 against the taxpayer with reference no. FIRS/TID/SD/04387668-0001 dated 03/12/2020 of N13,263,078.95 on VAT 2019 YOA	Explanation should be provided on the observation raised	
		EDT	2018			BEST OF JUDGEMENT	250,000.00	EDT Tax Assessment for 2018 YOA was raised with the reference no. FIRS/ONT-MSTO/BOJ/164687-0001/01/18 Dated 7th August 2018 on best of judgement against the taxpayer regarding a demand notice for EDT-N250,000.00 liability for 2018 YOA	Explanation should be provided on the observation raised	
			2019			ADDITIONAL/AMENDED	4,120,190.00	Additional/Amended Assessment was raised against the taxpayer with the Assessment no. LTO/AWK/AD/018 of 09/10/2021 of N4,120,190.00 on CIT	Explanation should be provided on the observation raised	

								2019 YOA		
				2020			TAX INVESTIGATION	3,063,724.66	Additional/Amended Assessment was raised against the taxpayer with the Assessment no. LTO/AWK/AD/019 of 09/10/2020 of N3,063,724.66 on EDT 2020 YOA	Explanation should be provided on the observation raised
			WHT	2018			TAX INVESTIGATION	10,167,447.71	Tax Investigation Exercise Assessment was raised for 2018-2019 against the taxpayer with reference no. FIRS/TID/SD/04387668-0001 dated 3rd December 2020 of N10,167,447.71 on WHT 2018 YOA	Explanation should be provided on the observation raised
				2019			TAX INVESTIGATION	26,316.00	Tax Investigation Exercise Assessment was raised for 2018-2019 against the taxpayer with reference no. FIRS/TID/SD/04387668-0001 dated 3rd December 2020 of N26,316 on WHT 2019 YOA	Explanation should be provided on the observation raised
28	PLUTUS INDUSTRIES LIMITED	18953275-0001	CIT	2018	AUDITED FIN STATEMENT	4,852,527.00	SELF ASSESSMENT	1,210,130.00	CAPITAL ALLOWANCE TO THE TUNE OF N4,852,527.00 WAS CLAIMED Self Assessment was raised by the taxpayer	Explanation should be provided on the observation raised

						amounting N1,210,130.00 and no evidence of payment seen in the file			
			2019	AUDITED FIN STATEMENT	4,972,807.00	SELF ASSESSMENT	1,395,125.00	CAPITAL ALLOWANCE TO THE TUNE OF N4,972,807.00 WAS CLAIMED Self Assessment and Additional/Amended Assessment was raised against the taxpayer with Assessment no. ENU/C/SA/LRP/05 dated 02/04/2019 for Late Return Penalty (LRP) for 2019 YOA CIT-N1,355,125(SA) and penalty N40,000.00 (AA) NO Evidence of payment seen in the file.	Explanation should be provided on the observation raised
			2020	AUDITED FIN. STATEMENT	2,559,319.00	ADDITIONAL/AMENDED	938,408.00	CAPITAL ALLOWANCE TO THE TUNE OF N2,559,319.00 WAS CLAIMED Additional/Amended Assessment was raised against the taxpayer via Assessment no. ENU/C/AA/CIT/015 dated 18/02/2020 amounted N938,408 on CIT 2020 YOA	Explanation should be provided on the observation raised
			2021	AUDITED FIN STATEMENT	655,510.00	ADDITIONAL/AMENDED	20,250,000.00	CAPITAL ALLOWANCE TO THE TUNE OF N655,510.00 WAS CLAIMED	Explanation should be provided on the observation raised

						Additional/Amended Assessment was raised against the taxpayer via Assessment no. LTA/CIT/16AD dated 02/07/2021 amounted N20,250,000.00 on CIT 2021 YOA		
		2021		DESK REVIEW	5,470,000.00	Desk review was raised via reference no. FIRS/LTO/AWKA/1895327 5-0001 Dated 17/05/2021 for CIT-N20,250,000.00, EDT-N1,350,000.00, VAT-N5,470,000.00	Explanation should be provided on the observation raised	
	EDT	2018		DESK REVIEW	242,026.00	Self Assessment was raised by the taxpayer amounting N1,242,026.00 and no evidence of payment seen in the file	Explanation should be provided on the observation raised	
		2019		SELF ASSESSMENT	315,432.00	Self Assessment was raised by the taxpayer amounting N315,432.00 and no evidence of payment seen in the file	Explanation should be provided on the observation raised	
		2021		ADDITIONAL/AMENDED	1,350,000.00	Additional/Amended Assessment was raised against the taxpayer via Assessment no. LTA/EDT/13AD dated 02/07/2021 amounted N1,350,000.00 on CIT 2021 YOA	Explanation should be provided on the observation raised	

29	BONS INDUSTRIES LIMITED	00037600 - 0001	CIT	2018	AUDITED FIN STATEMENT	17,959,619.00	DESK REVIEW	10,171,741.84	CAPITAL ALLOWANCE TO THE TUNE OF N17,959,619.00 WAS CLAIMED Additional Assessment was raised for 2016 - 2018 YOA with reference no. ENU/MSTO/RPP/00037600-0001 Dated 20th Feb. 2019 revealed that the taxpayer has under assessed itself for the years under review. The company is therefore re-assessed based on minimum tax and details of the additional assessment are as follows; 2016-CIT-N2,064,194.14 2017-CIT-N3,346,211.71 2018-CIT-N4,761,335.99	Explanation should be provided on the observation raised	
				2019	AUDITED FIN STATEMENT	66,157,157.00	NIL	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N66,157,157.00 WAS CLAIMED No assessment was raised in 2019 YOA	Explanation should be provided on the observation raised	
				2020	AUDITED FIN STATEMENT	66,052,328.00	NIL	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N66,052,328.00 WAS CLAIMED	Explanation should be provided on the observation raised	
				2021	AUDITED FIN STATEMENT	309,389,239.00	NIL	NIL	NO Financial Statement for the year 2021. but letter to upload Capital Allowance was in the file of the taxpayer Amounting to	Explanation should be provided on the observation raised	

									309,389,239.00		
30	SIMS NIGERIA LIMITED	01061982-0001	CIT	2018	AUDITED FINANCIAL STATEMENTS	293,483,391.00	ADDITIONAL/AMENDED	1,638,184.00	CAPITAL ALLOWANCE TO THE TUNE OF N293,483,391.00 WAS CLAIMED Audit Assessment was carryout via reference no. FIRS/LTAPH/01061982-0001/2020/264 Dated 27th August 2020 base on recociliation between FIRS and d Taxpayer	Explanation should be provided on the observation raised	
				2019	AUDITED FINANCIAL STATEMENTS	257,313,187.00	ADDITIONAL/AMENDED	3,924,773.00	CAPITAL ALLOWANCE TO THE TUNE OF N257,313,187.00 WAS CLAIMED Tax Audit Assessment was carryout for the year 2019 with reference no. FIRS/LTO/RPP/PH/01061982-0001 Dated 19th November 2019 and there was no evidence of payment	Explanation should be provided on the observation raised	
				2020	AUDITED FINANCIAL STATEMENTS	378,375,072.00	ADDITIONAL/AMENDED	48,213,842.13	CAPITAL ALLOWANCE TO THE TUNE OF N378,375,072.00 WAS CLAIMED Minimum tax computation was carryout in the year 2020 YOA via reference no. FIRS/LTO/AWK/01061982-0001/2020 Dated 4th August 2020 for income	Explanation should be provided on the observation raised	

						tax outstanding for 2020 YOA N48,213,842.13		
	2021	AUDITED FINANCIAL STATEMENTS	241,605,260.00	ADDITIONAL/AMEND ED	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N241,605,260.00 WAS CLAIMED NO Assessment was raised in the year 2021 YOA	Explanation should be provided on the observation raised	
	VAT							
	2018			NIL	NIL	NIL		
	2019			DESK REVIEW	6,070,733.10	Tax Matter was raised 2020 YOA against the taxpayer via letter with reference no. FIRS/LTO/RPP/AWK/0106 1982-0001/02/2020 dated 2nd October 2020 with the sum of N6,070,733.10 for VAT, for 2019 YOA. And no evidence of payment was seen in the Taxpayer's file.	Explanation should be provided on the observation raised	
	EDT							
	2018			AUDIT ASSESSMENT	327,637.00	Audit Assessment was carryout via reference no. FIRS/LTAPH/01061982- 0001/2020/264 Dated 27th August 2020 base on recociliation between FIRS and d Taxpayer	Explanation should be provided on the observation raised	
	2019			TAX AUDIT	784,954.00	Tax Audit Assessment was carryout for the year 2019 with reference no. FIRS/LTO/RPP/PH/010619	Explanation should be provided on the observation raised	

									82-0001 Dated 19th November 2019 and there was no evidence of payment		
				2021	NIL	NIL	AUDIT ASSESSMENT	641,162.00	Additional/Amended Assessment was raised against the taxpayer with the Assessment no. FIRS/LTAP/LTPO/AA/2020 dated 29th July 2022 of N641,162 on EDT 2020 YOA	Explanation should be provided on the observation raised	
31	INFRAVISION LIMITED	20659621-0001	CIT	2018	NIL	NIL	NIL	NIL	the taxpayer started operational in the 2017 - 2018 YOA		
				2019	AUDITED FIN STATEMENT	247,211,129.00	SELF ASSESSMENT	64,591,398.30	CAPITAL ALLOWANCE TO THE TUNE OF N247,211,129.00 WAS CLAIMED Self Assessment was conducted by the taxpayer that amounted to 64,591,398.30		
				2020	AUDITED FIN STATEMENT	26,473,261.00	SELF ASSESSMENT	196,057,000.00	CAPITAL ALLOWANCE TO THE TUNE OF N26,473,261.00 WAS CLAIMED Self Assessment was conducted by the taxpayer that amounted to 196057000		
				2021	AUDITED FIN STATEMENT	381,243,000.00	NIL	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N381,243,000.00 WAS CLAIMED		
				2019			SELF ASSESSMENT	9,250,315.78	Self Assessment was conducted by the		

									taxpayer that amounted to 9,250,315.78		
				2020			SELF ASSESSMENT	9,256,448.07	Self Assessment was conducted by the taxpayer that amounted to 9,256,448.07		
32	ABC TRANSPORT PLC	01058004-0001	CIT	2018	AUDITED FIN STATEMENT	843,157,000.00	ADDITIONAL/AMENDED	3,390,206.00	CAPITAL ALLOWANCE TO THE TUNE OF N843,157,000.00 WAS CLAIMED A demand notice and assessment notices was raised against the compay via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account		
				2019	AUDITED FIN STATEMENT	274,928,000.00	ADDITIONAL/AMENDED	830,700.00	CAPITAL ALLOWANCE TO THE TUNE OF N274,928,000.00 WAS CLAIMED A demand notice and assessment notices was raised against the compay via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account		

			2020	AUDITED FIN STATEMENT	1,115,371,000.00	ADDITIONAL/AMENDED	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N1,115,371,000.00 WAS CLAIMED * A demand notice and assessment notices was raised against the compay via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account. Summary are; YOA-2019-N997,220.00, 2018-N12,534,790.68, 2017-N14,533,085.27, 2016-N9,644,323.98, 2015-N15,893,359.32.		
			2021	AUDITED FIN STATEMENT	NIL	ADDITIONAL/AMENDED	5,842,747.50	there was no Capital Allowance generated in the Financial Statement. Additional/Amended Assessment was raised against the taxpayer with the Assessment no. LTO/AWK/SA/AD12AD for the year 2021 YOA		
	VAT		2018			ADDITIONAL/AMENDED	2,217,241.95	A demand notice and assessment notices was raised against the compay via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the		

							Audit exercise carried out for the year 2015-2018 Account		
		EDT	2018			ADDITIONAL/AMENDED	469,420.00	A demand notice and assessment notices was raised against the company via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account	Explanation should be provided on the observation raised
			2019			ADDITIONAL/AMENDED	166,520.00	A demand notice and assessment notices was raised against the company via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account	Explanation should be provided on the observation raised
		WHT	2018			ADDITIONAL/AMENDED	6,457,922.73	A demand notice and assessment notices was raised against the company via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account	Explanation should be provided on the observation raised

			TET	2018			ADDITIONAL/AMENDED	469,420.00	A demand notice and assessment notices was raised against the company via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account	Explanation should be provided on the observation raised	
				2019			ADDITIONAL/AMENDED	166,520.00	A demand notice and assessment notices was raised against the company via letter with reference no. FIRS/LTAPH/01058004-0001/2020/267 dated 27th August, 2020 for the Audit exercise carried out for the year 2015-2018 Account	Explanation should be provided on the observation raised	
33	Tunnel end investment	02385396-0001	CIT	2018	AUDITED FIN STATEMENT	N930,956,635	NO DESK REVIEW	NIL	CAPITAL ALLOWANCE TO THE TUNE OF N198,415,999.58 WAS CLAIMED	Explanation should be provided on the observation raised	
				2019	AUDITED FIN STATEMENT	NIL	NO DESK REVIEW	NIL			

				2020	AUDITED FIN STATEMENT	79,742,060.00	YES	NIL	REMINDER OF TAX INDEBTEDNESS FOR 2011-2013 AND 2017(REF:MTO/ENU/FDE/2020/02385396-0001/01, DATED 11TH NOVEMBER 2020.) ASS ASS YR 2011 2012 2013 2017 TOTAL CIT PENALTY N4,423,748 N3,517,218 N260,062.47 N 300 PENALTY N442,375 N351,218 N 26,006 N30 INTEREST 10% N840, N 512 668,271 N49,412 N 57 TOTAL N5,706,634.92 N4,537,211.22 N335,480.59 N387.00 GRAND TOTAL 10,579,713.73	Explanation should be provided on the observation raised	
			VAT	2018			NO	NIL			
				2019			YES	NIL	ADD VAT OF 22,195,170.62 FOR 2018	Explanation should be provided on the observation raised	
				2020			YES	NIL	TO PAY N17,195170.62 COMMENCING FROM 4TH OCT, 2019	Explanation should be provided on the observation raised	
				2021			NO	NIL			
34	AFRO OCEAN BRIDGE NIG LTD	16185763-0001	CIT	2018	AUDITED FIN STATEMENT	NIL	YES	N15,021,475.00	TO PAYBACK DISALLOWABLE EXPENSE(UNSUBTANTIATED GENERAL EXPENSES DISALLOWED=		

						N3,984,431) & PORTION OF SECURITY EXPENSES DISALLOWED=N15,021,475.00)		
	2019	AUDITED FIN STATEMENT	NIL	YES	4,001,960.00	TAX REVIEW : CIT-N4,001,960.00		
	2020	AUDITED FIN STATEMENT	NIL	YES	37,197,182.20	A) VAT 2019(OUTSTANDING=517,584.46) -) CIT 2019=9,989163.20+VAT(517,584.46)+WHT(320,461.00)=N10,827,208.85 B)ADD/AMEND ASSESSMENT=27,208,019.		
VAT	2018	N/A		NO	NIL			
	2019	N/A		NO	NIL			
	2020	N/A		YES	957,791.14	A) TAX REVIEW = VAT=N517,584.46. B)ADDITIONAL VAT PAYMENT FOR OCT 2019 AND DIFFERENCE IN JANUARY 2020(OCT 2019=193871.71)+ JANUARY 2020(246,334.97)=440,206.68.		
EDT	2018			NO DESK REVIEW	NIL			
	2019			YES	273,094.00	A)OUTSTANDING=206,820 + PENALTY(20,682.00)+ INTEREST(39,296.00). B) TAX LIABILITY=N233,798	Explanation should be provided on the observation raised	
	2020			YES	3,752,657.00	ADD/AMEN ASSESSMENT= N3.752,657	Explanation should be provided on the observation raised	

				2021			YES	3,752,657.00	ADDITIONAL/AMENDED ASSESSMENT=N3,752,657.00	Explanation should be provided on the observation raised	
			WHT	2018			NO DESK REVIEW	NIL			
				2019			YES	N1,494,744.00	A)DEMAND NOTICE:TOTAL WHT:23,174,319.00. (WHT DUE=N1,158,716+ PENALTY=115,872.00+INT EREST=115,872.00=WHT PAYABLE= N1,494,744.00	Explanation should be provided on the observation raised	
				2020			YES	320,426.00	B) VAT 2019(OUTSTANDING=517,584.46) C) CIT 2019=9,989163.20+VAT(517,584.46)+WHT(320,461.00)=N10,827,208.85	Explanation should be provided on the observation raised	
				2021			YES	N10,450,000.00	DEMAND NOTICE OF N10,450,000.00 WHT PAYABLE	Explanation should be provided on the observation raised	
35	GREGRIL INTERNATIONAL LTD	00053641-0001	CIT	2018	AUDITED FINANCIAL STATEMENT	1,389,571.00	NO DESK REVIEW	NIL			
				2021	NONE	NIL	YES	N16,416,358.97	2) ADDITIONAL ASSESSMENT 2019 & 2020 YOAS ADDITIONAL MINIMUM TAX----- N16,416,358.97 WHT----- ----- N2,665,744 VAT PENALTIES----- ----- N 5,900,000 TOTAL TAX LIB N	Explanation should be provided on the observation raised	

									24,982,102.97		
z36	MICHELLE LABORATORIES LTD	00427898-0001	CIT	2018	AUDITED FIN STATEMENT	2,560,595.00	NO DESK REVIEW	NIL			
				2019	AUDITED FIN STATEMENT	32,164,197.00	YES	11,817,132.00	REVISED TAX COMPUTATION(CIT DUE=N11,061,747.00), EDT=N12,604,976), 2)ADDITIONAL/AMENDED ASSESSMENT=N755,385.	Explanation should be provided on the observation raised	
				2021	AUDITED FIN STATEMENT	59,979,978.00	YES	NIL	ADDITIONAL/AMENDED ASSESSMENT=TAX DUE=3,907,673.....S/N PARTICULARS YEAR AMOUNT N 1 .CAPITAL ALLOWANCE GRANTED 2018 198,796,056 2 .CAPITAL ALLOWANCE GRANTED 2019 228,122,166 3 .CAPITAL ALLOWANCE GRANTED 2020 301,469,618 4 .CAPITAL ALLOWANCE GRANTED 2021 316,978,116 TOTAL N 1,045,365,956.	Explanation should be provided on the observation raised	
				2019			YES	13,670,221.00	ADDITIONAL/AMENDED ASSESSMENT= TAX DUE= 1,065,245 B)N12,604,976	Explanation should be provided on the observation raised	
			WHT	2018		YES	NIL	DEMAND NOTICE:WHT OUTSTANDING	Explanation should be provided on the		

								=N471,284+ INTEREST(N89,544)+ PENALTY(47,128)	observation raised		
				2019		38,288,378.00	YES	NIL	ADDITIONAL/AMENDED ASSESSMENT= TAX DUE=1,065,245. B) DEMAND NOTICE= WHT OUTSTANDING=N650,114 +INTEREST(123,422)+ PENALTY(65,011)	Explanation should be provided on the observation raised	
				2020			YES	NIL	DEMAND NOTICE:WHT OUTSTANDING =N437,284+ INTEREST(N83,043)+ PENALTY(43,707)	Explanation should be provided on the observation raised	
				2021		59,979,978.00	YES	NIL	ADDITIONAL/AMENDED ASSESSMENT= TAX DUE=1,799,399.	Explanation should be provided on the observation raised	
37	TIGER FOOD LIMITED	01135823-0001	CIT	2018	AUDITED FIN STATEMENT	106,552,842.00	YES	N35,675,937.88	Audit observed that the agency wrote to FIRS on the 27th of 2018 appealing that the tax liability for 2013-2017 being N35, 675,937.88(thirty five million, six hundred and seventy five thousand, nine hundred and thirty seven naira, eighty eight kobo) be merged and that Tiger Foods be allowed to defray in twelve installments (October 2018- September 2019), which the FIRS agreed to. The record of payments	Explanation should be provided on the observation raised	

									made thereafter by Tiger Foods Plc shows that ONLY N19, 132,976.25 (NINETEEN MILLION, ONE HUNDRED AND THIRTY TWO THOUSAND, NINE HUNDRED AND SEVENTY SIX NAIRA, TWENTY FIVE KOBO.		
				2019	AUDITED FINANCIAL STATEMENT	118,996,846.00	NO DESK REVIEW	NIL			
				2020	AUDITED FINANCIAL STATEMENT	228,122,166.00	NO DESK REVIEW	NIL			
				2021	AUDITED FINANCIAL STATEMENT	316,978,116.00	YES	30,006,397.00	The tax liabilities of N30, 006,397.00(THIRTY MILLION AND SIX THOUSAND, THREE HUNDRED AND NINETY SEVEN NAIRA ONLY) ONLY for 2018-2020 had only N14, 163,345.00 (fourteen million, one hundred and sixty three thousand, three hundred and forty five naira only defrayed.	Explanation should be provided on the observation raised	
38	ROBAN STORES INT: RC: 366734	00065299-0001	CIT	2018	AUDITED FINANCIAL STATEMENT	80,694,335.00	NO DESK REVIEW				
				2019	AUDITED FINANCIAL STATEMENT	150,230,973.00	YES	3,174,762.00	ADDITIONAL/ AMENDED N3,174,762	Explanation should be provided on the observation raised	

			2020	AUDITED FINANCIAL STATEMENT	69,687,156.00	YES	2,179,316.00	ADDITIONAL/AMENDED N2,179,316	Explanation should be provided on the observation raised	
			2021	AUDITED FINANCIAL STATEMENT	83,006,557.00	YES	1,984,034.00	The tax REVIEW = CIT OUTSTANDING= N1,846,994 + CIT LRP= N30,000 B) ADDITIONAL/AMENDED= N107,040)	Explanation should be provided on the observation raised	
		VAT	2018			YES	12,649,384.00	VAT RE-ASSESSMENT NOTICE(TOTAL VAT DUE PLUS INTEREST AND PENALTY(32,29,470 - AMT ALREADY PAID N19,642,087)	Explanation should be provided on the observation raised	
			2019				7,257,056.00	VAT RE-ASSESSMENT NOTICE(TOTAL VAT DUE PLUS INTEREST AND PENALTY(42,402,227 - AMT ALREADY PAID N35,145,171)	Explanation should be provided on the observation raised	
			2020				1,287,059.00	VAT RE-ASSESSMENT NOTICE(TOTAL VAT DUE PLUS INTEREST AND PENALTY(50,739,275- AMT ALREADY PAID N49,452,215)	Explanation should be provided on the observation raised	
			2021			YES	64,438,210.00	VAT RE-ASSESSMENT(TAX DUE= N35,339,651- AMT ALREADY PAID=N 23,078,450) TAX REVIEW (VAT@7.5% OF 532,320,490.37 = N39,924,037 + PENALTY N3,992,037 +INTEREST N7,585,567+ VAT LRP	Explanation should be provided on the observation raised	

								N675,000)		
			EDT	2018			YES	475,593.00	ADDITIONAL/AMENDED ASSESSMENT 475,593	Explanation should be provided on the observation raised
				2021			YES	1,023,170.00	TAX REVIEW= EDT OUTSTANDING= N961,762. B) ADDITIONAL/AMENDED= N 61,408	Explanation should be provided on the observation raised
			WHT	2018			YES	1,749,531.79	DEMAND NOTE= TAX PAYABLE= 1,356,226.19 + PENALTY N135,622.62+ INTEREST N257,682.98)	Explanation should be provided on the observation raised
				2019			YES	521,113.00	DEMAND NOTE= TAX PAYABLE= 403,963 + PENALTY N76,753+ INTEREST N40,396)	Explanation should be provided on the observation raised
				2020			YES	6,379,703.00	DEMAND NOTE= WHT OUTSTANDING = N4,945,502+ INTEREST N939,649+ PENALTY N494,552)	Explanation should be provided on the observation raised
				2021						
39	ALUMINIUM EXTRACTION	00361349-0001	CIT	2018	AUDITED FINANCIAL STATEMENT	19,622,235.00	YES	1,000,411.00	ADDITIONAL/AMENDED ASSESSMENT = TAX PAYABLE 1,000,411.	Explanation should be provided on the observation raised
			VAT	2018			YES	10,985,041.00	VAT RE-ASSESSMENT NOTICE(TOTAL VAT DUE +INTEREST+PENALTY = N60,256,749 -	Explanation should be provided on the observation raised

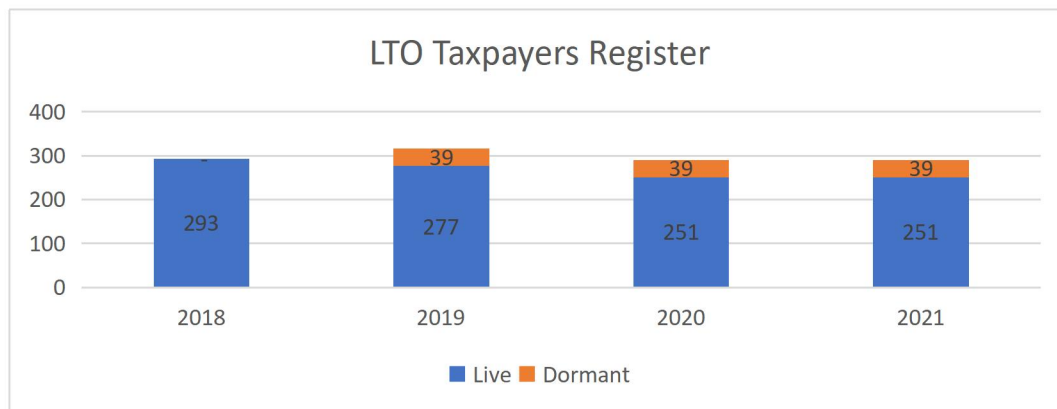
							49,271,749(AMOUNT ALREADY PAID)= N10,985,041.		
			2019			YES	5,836,772.00	VAT RE-ASSESSMENT NOTICE(TOTAL VAT DUE +INTEREST+PENALTY = N50,064,401 - 44,277,629(AMOUNT ALREADY PAID)= N5,836,772.	Explanation should be provided on the observation raised
			2021						

PORTHARCOURT

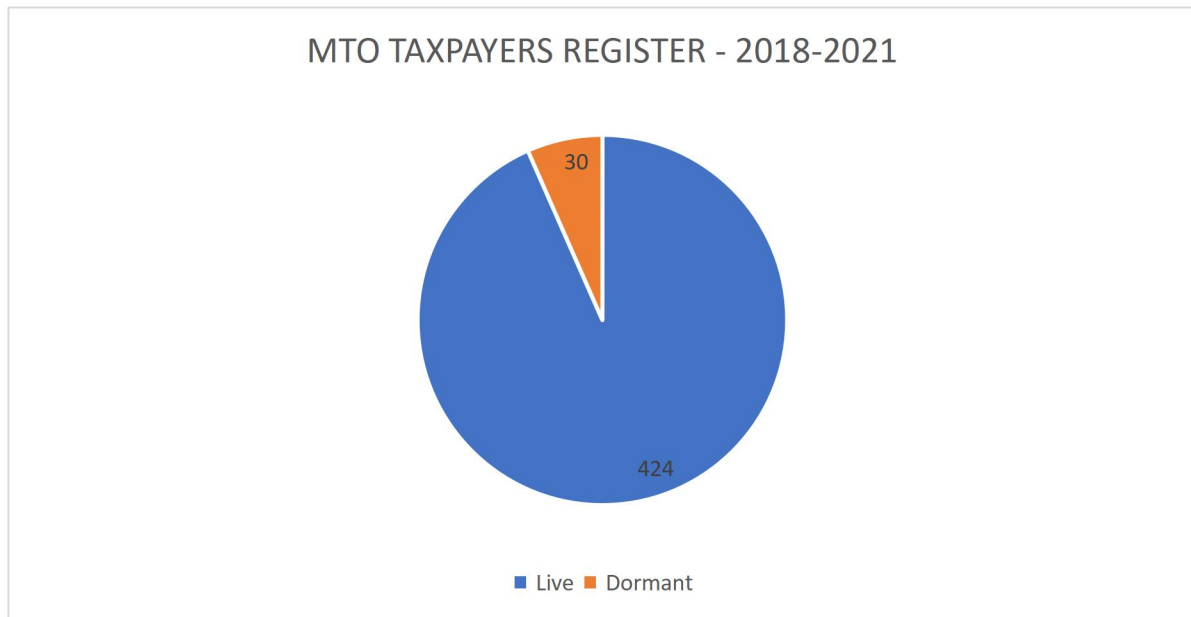
A. Summary of Specific Observations/Findings:

- i. The Taxpayer Registers of the Large Tax Office located in Port-Harcourt, Rivers State comprise the list of active taxpayers and dormant taxpayers. The table and the graph below illustrate changes in the number of taxpayers registered from 2018 to 2021.

LTO TAXPAYER REGISTER		
Year	Live	Dormant
2018	293	-
2019	277	39
2020	251	39
2021	251	39



MTO TAXPAYER REGISTER		
Year	Live	Dormant
2018-2021	424	30



Observations:

- i. **LTO:** It was observed that the Federal Inland Revenue Service (LTO) Port-Harcourt did not only failed to bring more taxpayer into the tax net but also lost some of the registered taxpayers to dormancy. In 2018, no dormant taxpayers were recorded, however from 2019 to 2021, 39 taxpayers were consistently inactive.
- ii. **MTO:** From 2018 to 2021 MTO Port-Harcourt recorded total number of 454 registered taxpayers, out of this number 30 were inactive.

Recommendation:

Explanation should be provided on the observations raised above

Management’s Response:

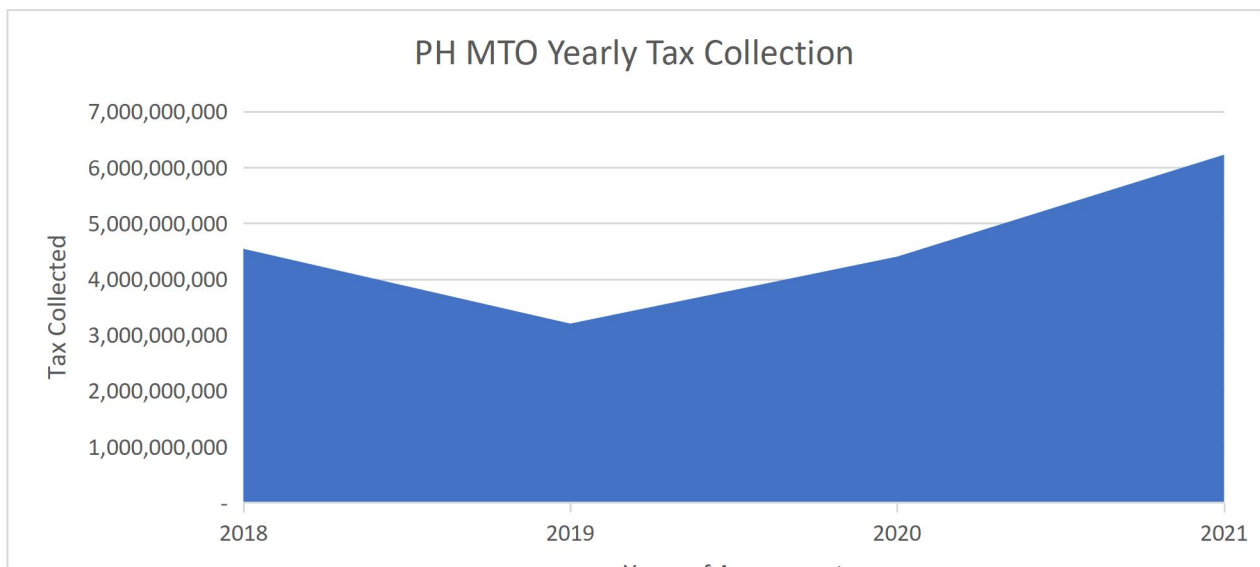
Management’s response to the Issue should be documented here

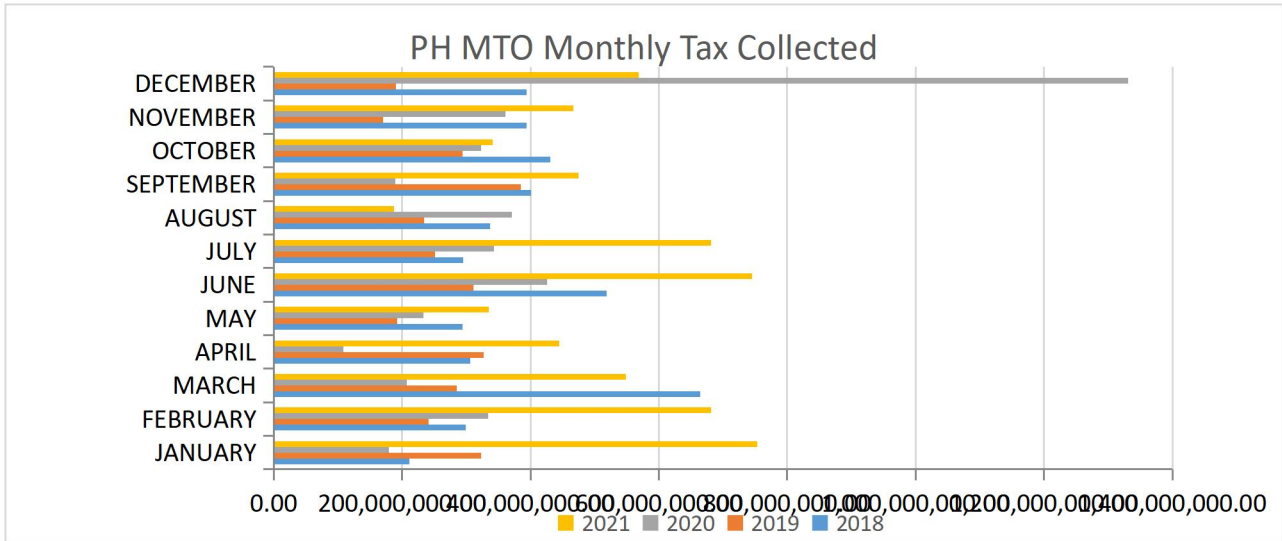
B. TAX COLLECTION:

i. Port-Harcourt MTO

The audit team reviewed yearly tax collection of the MTO Port-Harcourt office for years 2018 to 2021 as represented below.

FEDERAL INLAND REVENUE SERVICE TOTAL COLLECTIONS IN MTO PORTHARCOURT - RIVERS STATE					
MONTH	2018	2019	2020	2021	TOTAL
JANUARY	211,074,364.63	322,690,687.48	179,119,767.47	752,838,500.36	1,465,723,319.94
FEBRUARY	299,227,789.39	240,777,176.06	333,777,396.92	681,698,824.64	1,555,481,187.01
MARCH	664,361,671.72	285,460,072.97	207,142,983.74	548,915,202.72	1,705,879,931.15
APRIL	305,802,354.14	326,944,748.20	107,885,744.34	444,258,318.27	1,184,891,164.95
MAY	294,038,780.27	192,605,870.24	233,247,894.92	335,000,352.06	1,054,892,897.49
JUNE	518,792,116.12	310,486,075.98	425,523,951.75	745,388,195.30	2,000,190,339.15
JULY	295,193,650.58	251,005,820.44	342,704,887.32	681,698,824.64	1,570,603,182.98
AUGUST	337,012,989.49	234,013,780.33	370,808,992.79	187,281,673.69	1,129,117,436.30
SEPTEMBER	401,049,645.18	385,293,459.20	188,729,924.45	474,517,718.17	1,449,590,747.00
OCTOBER	430,386,420.08	293,867,984.81	323,124,546.62	341,286,328.55	1,388,665,280.06
NOVEMBER	393,547,479.54	170,560,396.11	360,458,896.08	466,533,734.89	1,391,100,506.62
DECEMBER	393,547,479.54	190,468,397.81	1,330,890,352.61	568,393,641.37	2,483,299,871.33
TOTAL	4,544,034,740.68	3,204,174,469.63	4,403,415,339.01	6,227,811,314.66	18,379,435,863.98





Observation:

As reported in the table below, total taxes collected by MTO Port-Harcourt in the year 2018 – 2021 was N18.379 billion. The graphical representation illustrated above showed a decline in revenue collected from 2018 to 2019 but increase was recorded from 2020 to 2021.

Recommendation:

Management should provide constraints that resulted into the decline for the years 2018 and 2019

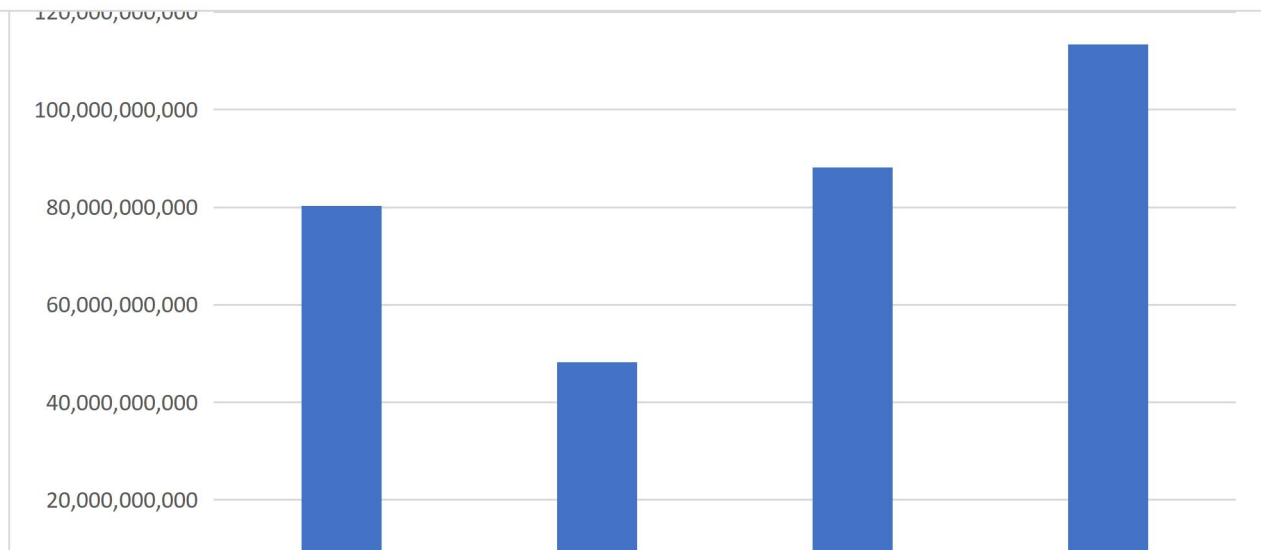
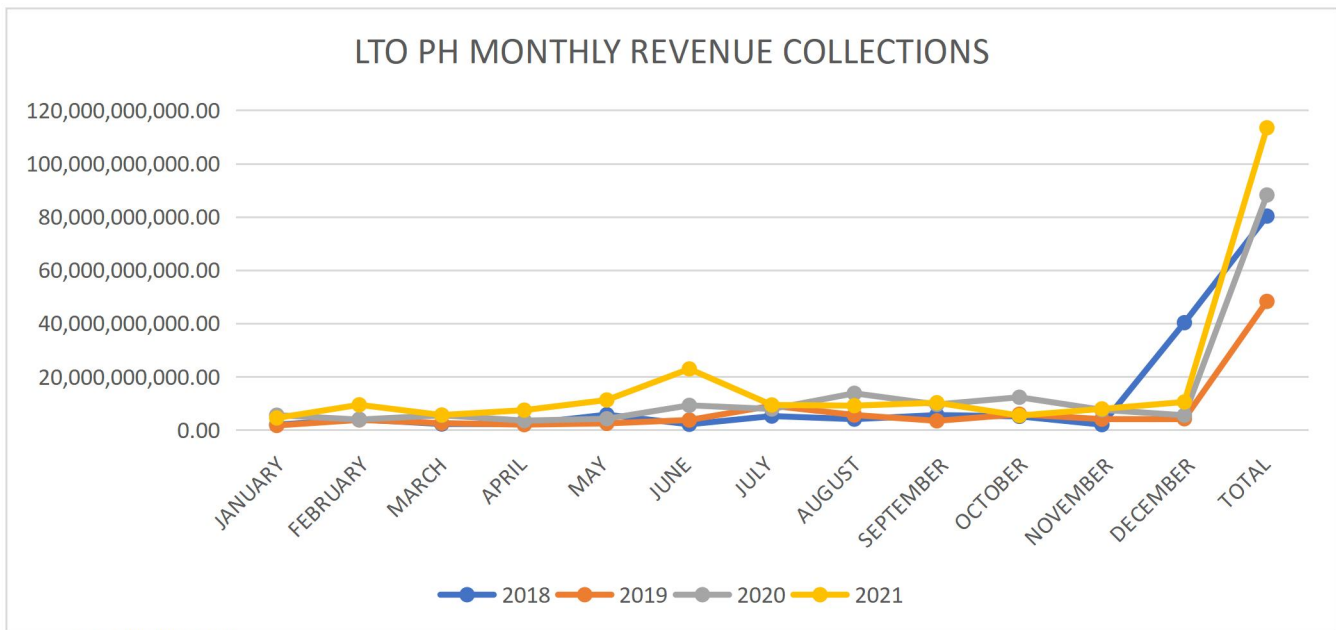
Management’s Response:

Management’s response to the Issue should be documented here

ii. Port-Harcourt Large Tax Office (LTO) Collections:

PH LTO recorded N113.421 Billion taxes from 2018 to 2021. This performance is below expectation.

FEDERAL INLAND REVENUE SERVICE LTO TOTAL REVENUE COLLECTION PORT HARCOURT- RIVERS STATE				
MONTH	2018	2019	2020	2021
JANUARY	1,959,267,574.60	1,669,784,445.30	5,524,472,426.31	4,480,843,497.97
FEBRUARY	3,947,099,340.58	3,750,644,702.35	3,862,741,639.65	9,413,103,758.71
MARCH	2,213,870,830.46	2,537,287,299.29	5,491,652,163.93	5,572,989,083.42
APRIL	2,221,105,001.77	1,978,902,184.84	3,479,499,095.34	7,416,772,318.32
MAY	5,707,890,337.32	2,443,453,446.42	4,186,889,106.20	11,227,672,025.37
JUNE	2,105,381,260.35	3,712,140,271.31	9,218,227,464.84	22,888,960,884.23
JULY	5,191,990,738.43	9,067,249,376.50	7,846,196,051.10	9,361,392,053.27
AUGUST	4,039,067,751.14	5,595,850,822.10	13,741,830,164.56	9,103,168,838.38
SEPTEMBER	5,564,363,444.83	3,402,506,666.32	9,556,027,365.05	10,200,895,253.91
OCTOBER	5,082,041,709.18	5,873,213,852.75	12,260,061,630.31	5,380,670,183.12
NOVEMBER	1,977,327,729.53	4,032,981,822.48	7,534,252,676.84	7,886,944,985.59
DECEMBER	40,258,201,927.70	4,184,847,729.20	5,491,652,163.93	10,488,318,484.96
TOTAL	80,267,607,645.89	48,248,862,618.86	88,193,501,948.06	113,421,731,367.24



Observations:

A huge decrease was observed from the PH LTO recorded for the year 2019 when compared with the preceding and future years. This performance was below expectation.

Recommendation:

Explanation should be provided on the observation raised above.

Management's Response:

Management's response to the Issue should be documented here

C. REVIEW OF TAX FILES

During the review of the sampled tax files, the following observation and recommendation stated under Column H and I respectively are forwarded for your necessary attention and kindly provide your responses accordingly.

A	B	C	D	E	F	G	H	I
S/N O.	COMPANY NAME	TIN NO	TAX TYP E	ACCT G. YEAR	ADDITIONAL TAX LIABILITY	OBSERVATIONS	RECOMMENDATION	FIRS RESPONSE
1	Benek Engineering Company Limited	01924362-0001	CIT	2017	202,725,958.20	<p>1. The Self Assessment done by the Company since 18/12/2018 was not reviewed until 24/06/2022. Therefore, the Company's claim could not be verified for additional tax liability till the period.</p> <p>Risk: Increase in Tax liability due to untimely review of self assessment.</p> <p>2. The Capital items were expensed in the Income and Expenditure Account for the year ended 31 December, 2017 which reduced the company's assessable profit for the period.</p> <p>3. There was no CAFA Certificate to claim Capital Allowances on QCE.</p>	Tax Audit as currently centralised should be dissentralised to allow each tax office conduct tax audit.	
			Edu Tax	2017	-13,515,063.88-			
			CIT	2018	-156,086,545.20-	<p>1. The Self Assessment done by the Company since 18/12/2018 was not reviewed until 24/06/2022. Therefore, the</p>	Explanation should be provided on the observation raised	

					Company's claim could not be verify for additional tax liability till the period. Risk: Increase in Tax liability due to untimely review of self assessment. 2. The Capital items were expensed in the Income and Expenditure Account for the year ended 31 December, 2017 which reduced the company's assessable profit for the period. 3. There was no CAFA Certificate to claim Capital Allowances on QCE.		
			Edu Tax	2018	- 10,405,769.68-		
2			CIT	2019	- 146,379,778.80-		
		Edu Tax			9,758,651.92		
		CIT			- 137,368,725.00-		
		Edu Tax			- 9,157,915.00-		
3	Kamharis Energy Limited	10450650-0001	CIT	2018	1,434,290.40		
			Edu		- 95,619.36-		
			CIT	2019		There was no CAFA for claiming of Capital Allowance for the period. There was no evidence of confirmation of revenue declared by the Company	Explanation should be provided on the observation raised
			Edu Tax		- 4,557,598.50-		
				2019	- 303,839.90-		
			CIT	2020		1. Depreciation was added back and there was no evidence of CAFA, Capital Allowance was disallowed. 2. There was more than 100% increment in Transport, Rent, Accomodation and Repair and Maintenance. Different between the previous and current year disallowed as there was note to indicate suh increments.	Explanation should be provided on the observation raised
			Edu Tax			- 5,585,159.10-	
				2020	- 372,343.94-		

4	A&N ENGINEERING CONSTRUCTION NIG, LTD	1412172 3-0001	CIT	2017	40,911,311.59	During the period under reviewed the Diesel expenses that was not in 2016, how managed it come up in 2017, we the tax audit of the company to authenticate the expenses. like wise in the VEchicle running cost. Salaries and wages we discovered that there is and increase from #364, 728,150.00 in 2016 to #436,036890.00, in 2017 which is the difference of #71,308,740.00, and like wise Transport and Travelling, 2016 # 102,776,350.00, while 2017 #194,581,300.00, and Security Expenses 2016	The increase in expenses would affect the tax that supposed paid to government, and there is no further disclosure in the note to accounts.
			EDU TAX	2017	8,182,262.32		
			CIT	2018	5,153,262.80	The company should calculate the additional tax liability for the period under review and paid it to the government. For the period under review 2017-2020.	there fore the company should pay the tax liability and bring the evidence of payment to the FIRS.
			Edu Tax	2018	1,030,652.56		
			CIT	2019	32,727,266.60		
			Edu Tax	2019	6,545,453.32		
			CIT	2020	1,534,437.10		
			Edu Tax	2020	306,887.42		
5	BENEJAF INTERNATIONAL LIMITED	0182141 9-0001	CIT	2017	- 43,368,046.36-	1. The Company was reassessed by FIRS LTO PH in 2018 Year of assessment, total Company Income Tax to be paid was N43,368,046.36, evidence of payment not seen.	Explanation should be provided on the observation raised
			EDU C TAX	2017	- 8,673,609.27-	1. The Company was reassessed by FIRS LTO PH mail dated 21st Feb.2018, ref: LTO/PH/RPP/018214719-0001/2018/1 Tax Recomputation show total Education Tax to be paid N8, 673,609.27, evident ofpayment not seen.	Explanation should be provided on the observation raised

6	BLUESEAL WATER AND PROCESS TREATMENT COMPANY LTD	0251882 9-0001	CIT	2017	- 3,555,550.30-	The Company was not able to pay tax assessment due the fact that since commencement of the business was running at a loss all year true, therefore she could not pay tax to FIRS . Even it can't operate the business in the year 2021 as year of assessment for 2020, based on the comment raised by tax authority in the year 2021 file and what company was not able to cover EDT, WHT and VAT stated accrude to company with FT comment that he suggest the company be issued restricted TCC while the F & DE pursue the outstanding taxes	Explanation should be provided on the observation raised	
7			EDU TAX	2017	- 711,110.06-			
8			CIT	2018	- 63,051.30-	No approval of CAFA for the Company to exempted them from Capital allowance for the tax		
9			EDU TAX	2018	- 12,610.26-	Furthermore, during the inspection of the preceeding year of assessment of 2020 the financial statement was not presented on their document file.		
10			CIT	2019	- 521,971.80-	There was no application and approval to use Capital allowance for tax incetive		
			EDU TAX		- 104,394.36-			
			CIT	2020	- 521,971.80-			
			EDU TAX		- 104,394.36-			
11	O. K. Isokariari & Sons Nigeria Limited	0000353 8-0001	CIT	2018		Delay in Filing Self Assessment Notice as against S. 55(3)(a) of CITA. the Self Assessment was not filed until 27/12/2018. Turnover may be understated to consume operating expenses reulted to operating loss. Despite all adjustment made, the compnay still resulted to loss in the year under review. The cause of shape increments (of over 1,000%) between 2016 and	Explanation should be provided on the observation raised	

					2017 financial period in some sub-component of Operating Expenses such as: Director REMuneration, Peronnel Cost, REnt and Rate, Travelling and Accomodation, Insurance Premium and Licenses, Professional and Legal Fees, HSE abd Business Development and Security Expenses could not be established. There was no disclosure to that effect.		
			CIT	2019		<p>1. Repair and Maintenane increased by over 1,500% from 5,612,105 in 2018 to 99,270,521 in 2019. Entertainment and Public Relation was included in the Expenses so also Gift and Donation which are disallowable expenses. Insurance Premium and Licenses keeps increasing without evidence of Policy Certificates.</p> <p>2. Capital Allowance could not be utilized due to absence of CAFA.</p>	Explanation should be provied on the observation raised
			CIT	2020	- 218,487,105.60-	<p>1. Capital Allowance not considered for computation as there was no CAFA to support QCE.</p> <p>2. Entertainment and Public Relation disallowed and added back</p> <p>3. Different in repair and maintenance added as there was no justification for such difference.</p>	Explanation should be provied on the observation raised
			EDU TAX	2020	- 14,565,807.04-		
12	ALL MAN GLOBAL SERVICE LTD	02453655-0001	CIT	2017	- 2,082,808.30-	During examination of records the company made deduction of Direct cost to tune of #259,519,845.00 and Administrative expenses of #67,505,138.00	Explanation should be provied on the observation raised
13			EDU TAX		- 416,561.66-		
			CIT	2018	- 1,997,933.30-	Examination of records shows increasement in the direct cost and adminstrative expenses compear to preceeding year of assessment of 587,581,637 and 255,957,901 respectiefully	Explanation should be provied on the observation raised
			EDU TAX	2018	- 399,586.66-		

			CIT	2019	- 2,863,846.20-	Evidence of tax receipt for assessment year were not attached	Explanation should be provided on the observation raised	
			EDU TAX	2019	- 572,769.24-			
			CIT	2020	- 2,217,686.80-	Evidence of tax receipt for assessment year were not attached	Explanation should be provided on the observation raised	
			EDU TAX	2020	- 443,537.36-			
14	PRIMEPORT LOGISTICS LIMITED	17810101-0001	CIT	2017	- 3,150,800.00-	For the period under review we observed that additional tax liability should calculate and paid to the government for the period we review. 2017-2020	Then when the payment is done let the company forward the evidence of payment to the Federal Inland Revenue Service (FIRS).	
			Edu Tax	2017	- 630,160.00-			
			CIT	2018	- 4,719,700.00-			
			Edu Tax	2018	- 943,940.00-			
			CIT	2019	- 6,600,400.00-			
			Edu Tax	2019	- 1,320,080.00-			
			CIT	2020	- 6,959,700.00-			
			Edu Tax	2020	- 1,391,940.00-			
15	DELHAIZE CONSULTANTCY LIMITED	18737481-0001	CIT	2017	- 175,528.30-	During examination of records some items thus DPR, Depreciation were deducted from expenses which make profit decrease before the tax.	Explanation should be provided on the observation raised	
			EDU TAX	2017	- 35,105.66-			
			CIT	2018	- 321,561.00-	The examination of the records review that some items disallowed were taken back to net profit for accounting year of assessment, thus DPR, Depreciation and Preliminary expenses, while the financial statement for 2019 were not prepared for assessment of 2020 accounting period.	Explanation should be provided on the observation raised	
16	LYN-EDGE PHARMACEUTICAL LIMITED	04611817-0001	CIT	2017	- 461,378.40-	The review of the files shows that the some expenses are disallowed for tax purposes. And there is a sharp increase of vehicle cost for	The increase without further disclosure in the note to accounts, for the increase of	

						the year 2019, from #410,900.00, to #1,572,100.00, also salaries and wages from #9,654,320.00 to #100,540,000.00	the expenses more than 50%	
			CIT	2019	- 10,919,806.20-	The tax liability for the period under review should be calculate and paid to the government.	After payment the company should forward the evidence of payment to FIRS.	
			EDU TAX	2019	- 2,183,961.24-			
			CIT	2020	NILL	In 2020 there is no financial statement in the file for the assement of tax as evedence to show up.	No evidence to see wether the company complied with the tax authority for that year.	
18	MICHEL INTERNATIONAL NIG,LTD	0178522 2-0001	CIT	2017	- 978,928.70-	During the period under review we discovered the sharp increase of the expenses of the following, Vehicles running cost from #24,180 in 2016 to 541,280 in 2017, salaries and wages from #350,000 in 2016 to #8,654,320 in 2017, printing and stioneries expenses from #19,825 in 2016 to #176, 210 in 2017 and eletricity bills from #28,155 in 2016 to #371,917 in 2017,	There is some expenses that the company claimed without forther disclosure in the note to accouts. By doing that the short charge government with tax.	
			CIT	2019	- 1,023,372.40-	The additional tax liability should calculate and paid to the government.	The evidence of payment should forward to Federal Inland Revenue Service (FIRS).	
			EdU TAX	2019	- 204,674.48-			
			CIT	2020		In 2020 there is no financial statement for the assemen tof the tax as evedence	We cannot ascertained the tax for that year due to the absence of financial statement.	

S/NO.	COMPANY NAME	TIN NO	TAX TYPE	YOA	ADDITIONAL TAX LIABILITY (IF ANY)	OBSERVATIONS	RECOMMENDATION	FIRS RESPONSE
1	NSIK OIL AND GAS LTD	2014039 1-0001		2018	Nil	1. Self Assessment was delayed till 4/12/2019 for accouting ended 31/12/2017. 2. The compnay is yet to commence operation as at the Financial period.	Explanation should be provided on the observation raised	
			CIT	2019	757,389.26	1. Notice of Assessment was not despatched until 4/12/2019	Explanation should be provided on the observation raised	

						^{2.} This delayed Self Assessment till 9/1/2020. ^{3.} The Company was not assessed on minimum tax thereby resulting to non-remittance.		
2	GINS GLOBAL SERVICE LIMITED	01231015-0001					When the company paid the additional tax liability the should bring the evidence of payment to FIRS.	
				2018	- 2,161,435.40-		The company should calculate the additional tax liabilities and pay it to the government	
				2019	- 3,679,619.20-			
				2020	- 5,151,139.80-			
			CIT	2021	NILL		1.In 2021 there is no audited financial statement or management report submitted by company, to enable us to ascertain the tax liability for that year. But there is tax pro in the file for 2021.	Explanation should be provided on the observation raised

5	WOMO LIMITED	00455997-0001					No financial statement or management or management report submitted by the company, due to that reason we cant access the tax liability of the company.	There for we cannot ascertain the level of tax compliance for the period since there is no financial audited financial statement in the file.
			CIT	2018	NO	NO		
6	SEGE-MARINE COMPANY NIGERIA LTD	03193777-0001					the company claime capital allowance without CAFA that means the dit not followed due process of claiming capital allowance for the good three years.	The company should paid back #13, 035,088.00 that the claimed as capital allowance since there is no CAFA in the file.
				2018	YES	- 523,371.00-		
				2019	YES	- 291,475.00-		
				2020	YES	- 369,109.40-		
			CIT	2021	TAX PROMAX	NA	There is no audited financial statement or management report submitted by the company, its only the tax pro that is filed in file.	Explanation should be provided on the observation raised
8	POINT ENGINEERING	01709994-0001					Self Assesment were remitted at appriate	Explanation should be provided on the
				2018	AFT	- 908,003.10-		

	LTD						time 28/6/2018	observation raised	
				2019	AFT	- 3,885,486.00-	Sef Assesement was remitted on 31/7/2019	Explanation should be provided on the observation raised	
				2020	AFT	- 2,750,793.81-	Self Assesement document could not attached	Explanation should be provided on the observation raised	

10	MB HUNT LOGISTIC COMPANY LTD	09351156-0001		2018	AFT	- 1,128,200.00-	Self Assesement tax was as when due 6/3/2018	Explanation should be provided on the observation raised	
				2019	AFS	- 1,607,000.00-	Self Assesemet tax was paid 12/3/2019	Explanation should be provided on the observation raised	
			CIT	2020	AFT	- 2,017,000.00-	Self Assesement tax was paid on 21/4/2020	Explanation should be provided on the observation raised	
				2018	AFS	- 225,640.00-	Self Assesement tax computed were complied with tax authority	Explanation should be provided on the observation raised	
			EDT	2019	AFS	- 321,400.00-	Additional new motor vehicle was purchases make to tune of 360,000.00 making capital allowance increase to 144,268,000.00 @ 2/3 % resulted to 12,178,793.00 for Assesement period	Explanation should be provided on the observation raised	

11	MOP MARINE NIGERIA LIMITED	03001772-0001							
			CIT	2018	AFS	- 14,077,099.1	<ol style="list-style-type: none"> 1. Transport Cost increase from 14,500 in 2016 to 67,000,000 in 2017. Cost is added back as there was no justification for such surge. 2. The different of the sum of 15,447,215 from 2016 to 2017 in Employee Benefits Cost is also added as there was no justification for increment. 3. Rent also increase by 8,000,000 now disallowed and added. 4. Marketing cost not disclosed in the 	Explanation should be provided on the observation raised	

						<p>previous accounting period for the sum of 16,750,000 added back.</p> <p>5. Different in Insurance Cost for the sum of 9,794,200 added to adjust assessable profit.</p> <p>6. Depreciation is constantly removed and added back and the CApital Allowance disallowed without OCAFA.</p>		
12	BLOOMBREED MONTESSORI SCHOOL LIMITED	16575966-0001						
			CIT	2018	MGT REPORT	-1,128,374.90-	The company is enjoying the capital allowance without CAFA attached to the file.	The company should pay back the money that the claimed as capital allowance since the dont have the requirement for it.
				2019	MGT REPORT	-1,238,050.00-		
				2020	NO		There is no management report for the year 2020 & 2021, that means we can not accessed tax liability.	We cannot ascertained the level of compliance by the company for the period, 2020 & 2021.