ECOOL GAMING SOLUTIONS PRIVATE LIMITED

Authority for Advance Ruling — Maharashtra

NO.GST-ARA-38/2018-19/B-111, Mumbai Dated **10.09.2018**

Q Questions Before the Authority

- Whether the applicant is liable to pay IGST under section 5(3) of the IGST Act, 2017.
- Whether Serial No. 5 of Notification No. 4/2017 - Integrated Tax (Rate) is applicable on supply received by the applicant.

F Facts

The applicant is a GST-registered distributor or marketing agent for lottery schemes organised by the State Government of Mizoram. It procures online lottery tickets from the organising State and sells them across Maharashtra through a chain of dealers and sales terminals. The applicant pays GST under reverse charge on these supplies, and the parties did not dispute that the rate is 28% where the lottery is State-authorised.

H Ruling

Liability to pay IGST under section 5(3) of the IGST Act, 2017	****Yes** (answered in the affirmative)**	Applicant is the recipient of an inter-State supply of lottery from the State of Mizoram, so IGST is payable on reverse charge.
Applicability of Serial No. 5 of Notification No. 4/2017-IGST (Rate) to supply received by applicant	****Yes** (answered in the affirmative)**	The entry covers supply of lottery by a State Government to a lottery distributor or selling agent. The order does not separately state the rate.

The Authority answered both questions in the affirmative. It held that the applicant, as recipient of lottery tickets supplied by the Government of Mizoram, which is located outside Maharashtra, is liable to pay IGST under reverse charge under section 5(3). It further held that Serial No. 5 of Notification No. 4/2017-IGST (Rate) applies to that supply.

R Reasoning

The Authority noted that the Government of Mizoram supplies the lottery and the applicant receives it in Maharashtra, so the supply is inter-State under section 7(1) of the IGST Act. Section 5(3) allows the Government to notify categories of supply on which the recipient pays tax under reverse charge. Serial No. 5 of Notification No. 4/2017-IGST (Rate) notifies supply of lottery in that way and adopts the meaning of lottery distributor or selling agent from Rule 2(c) of the Lotteries (Regulation) Rules, 2010, made under section 11(1) of the Lotteries (Regulation) Act, 1998. The applicant's argument on place of supply under section 10(1)(c) and its reading of the notification's obsolescence point were not separately addressed in the observations.

Prepared as a reading aid. Where this summary and the original order differ, the order governs.

P Provisions Relied On

- Section 5(3) of the IGST Act, 2017
- Section 7(1) of the IGST Act, 2017
- Notification No. 4/2017-Integrated Tax (Rate), Serial No. 5
- Rule 2(c) of the Lotteries (Regulation) Rules, 2010 (as referred to in the notification entry)
- Section 11(1) of the Lotteries (Regulation) Act, 1998 (as referred to in the notification entry)

! For the Practitioner

This ruling confirms that a Maharashtra distributor buying lottery tickets from another State's government is the reverse-charge taxpayer under section 5(3) read with Serial No. 5 of the 4/2017 rate notification. It is useful for distributors and selling agents who face the same arrangement. The order is brief, does not discuss the rate, and does not resolve the applicant's place-of-supply argument under section 10(1)(c). It binds only the applicant and should be read in full before reliance.

Source

Summary prepared from the published order, which is a scanned document. It is a reading aid and not the authority: where the two differ, the order governs. Verify every provision against the original before relying on it.

Original order: www.gstcouncil.gov.in -> maha-gst-ara-38-b-111_dt._10.09.18-ecool.pdf

Prepared 24-10-2026.

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Pune (HQ)
RTC Silver, B4-708, Sai Satyam Park, Wagholi, Pune, Maharashtra 412207

Mumbai
104, Rajshila Building, 597 J.S.S. Road, Marine Lines, Mumbai 400002

Delhi
3rd Floor, B-6/154-155, Sector 5, Rohini, Delhi 110085

Gurugram
Pioneer Urban Square, B109, Golf Course Ext Road, Sector 62, Gurugram…

Ahmedabad
Phoenix Tower, 1107, near Commerce Six Road, Drive In Road, Navrangp…

Talk to us: +91 94594 56700 | sales@patronaccounting.com | patronaccounting.com