Certificate Course on Preparation of Appeals, Drafting of Deeds & Documents, and Representation before Appellate Authorities and Statutory Bodies

S No	Day	Hours	Topic
1	Day 1	2.5	• General Principles of Drafting Different types of Deeds and Documents • Importance of use of 'definitions" and "legal phrases" for Drafting and Conveyancing • Interpretation/ Legal Implications of Deeds and Documents • Drafting and Conveyancing relating to Deeds and Agreements under Companies Act 2013, The Indian Partnership Act 1932 and Limited Liability Partnership Act, 2008.
2		2.5	• Search and Seizure under the Income Tax Law. • Understanding Framework of Search and Seizure Provisions • Overview of Block Assessment Scheme • Current key issues
		1	**Professional conduct & Inter-personal skills** • Importance of tone, clarity, and neutrality when communicating with government officials • Proper attire, decorum, and body language before quasi-judicial • forums • Active listening vs passive listening – how to truly understand authority queries • Assertiveness and clarity in submission of facts, evidence, and pleadings • Rapport building with officials without compromising independence
3	Day 2	2	• Provisions of Survey under the Income Tax Act, 1961 including issues arising thereon.
		3	• Inspection, Search and Seizure provisions under GST • Legal Framework of Inspection, Search and Seizure under GST • Judicial Review of Inspection/ Search Actions • Assessments following a Search action.
		1	**Ethics in representation** • Transparency and full disclosure – balancing client confidentiality and public duty • Avoiding misrepresentation or suppression of facts • Importance of maintaining documentation and audit trail • Dealing with undue pressures from clients – Ethical dilemma discussions
4	Day 3	1.5	• Fundamentals of Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015 • Background and Objective of the Act • Key Provisions • Overview of Penalties and Prosecution • Role of Technology and Data Analytics in Detecting Undisclosed Foreign Assets • Implementation hurdles and compliance burden • Assessments and Adjudication procedure under Black Money Act
		1.5	• Fundamentals of Benami Transactions (Prohibition) Act, 1988 • Introduction and Evolution of the Benami Transactions Act • Key Provisions • Overview of Penalties and Prosecution

			• Assessment and Adjudication procedure under the Benami Act
		2	• Fundamentals of Prevention of Money Laundering Act, 2002 • Background and Objective of the Act • Key Provisions • Overview of Penalties and Prosecution • Assessment and Adjudication procedure under PMLA
		1	**Use of AI** • Use of ChatGPT and other NLP models to generate initial drafts and clauses • Automation of standard templates for power of attorney, affidavits, appeals • Error checking, legal language refinement using AI tools • Document comparison tools and version tracking using AI • AI-assisted case law research and precedent retrieval • Using AI to analyze tribunal decisions and assess likelihood of success • Speech-to-text tools for hearing notes and transcript preparation • Summarizing bulky case files using AI for quicker review
5	Day 4	2	**Appeals before the Appellate Commissioners under the Income Tax Act, 1961.** • Preparatory steps before filing an appeal • Appealable orders before CIT(A) • Filing an Appeal: Step-by-Step Procedure, Documentation, Timelines and Petition for Condonation of delay • Petition for stay of demand before the CIT on the rejection of Stay by AO • Additional evidences, additional grounds and further written submissions to be filed during the course of hearing • Powers of CIT(A) • Procedural aspects of faceless representation including request for personal hearing before disposal. • Practical utility of Revision Petition under section 264 • Scope of Revision Proceedings under Section 263 • An Overview of the Dispute Resolution Mechanism under the Income Tax Act.
		2	**Appeals before the Appellate Tribunal under:** • Income Tax Act, 1961 • Overview of Appellate Process before the ITAT • Filing an Appeal Before the ITAT: Step-by-Step Procedure, Documentation, and Timelines • Admissibility of Appeals: Jurisdiction, Limitation, and Conditions Precedent • Stay of Demand and Interim Reliefs: Legal Framework and Practice • Applications for early hearing • Filing of additional evidences, additional grounds, cross objections and other submissions. • Case Laws, Precedents and Trends • Effective Representation before the ITAT • Scope of Powers of the ITAT • Binding nature of ITAT Orders and their impact on subsequent assessments. • Invoking Writ Jurisdiction for Income Tax Matters.

		2	• Framework of Appeals before Tribunal under Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015 • Framework of Appeals before Tribunal under The Benami Transactions (Prohibition) Act, 1988 • Framework of Appeals before Tribunal under The Prevention of Money Laundering Act, 2002
6	Day 5	6	**Procedural Framework for Appeals under GST before the Appellate Commissioner and the Appellate Tribunal** • Role of Chartered Accountants in GST Litigation • Preparation for First Appeal – Pre deposit, condonation, limitation • Drafting First Appeal - Statement of facts, grounds, prayer with common errors • Powers of appellate authority • Representation before First Appellate Authority – Dress Code, Use of Technology, Common Mistakes, Additional Submissions, conduct of proceedings • Study and approach to Appellate orders • Drafting appeals to GSTAT – Rules of Procedure, drafting, filing, curing defects, filing of additional evidences • Representation before GSTAT • Brief about Writs and circumstances where the writ jurisdiction can be invoked
7	Day 6	1	• Overview of Prosecution provisions and Legal recourse under Income Tax Act
		2	• Interplay between the Black Money Act, Benami Act, PMLA, Income Tax Act and GST
		3	• Mock Tribunal
Total		36	