

**REPUBLIC OF KENYA  
IN THE TAX APPEALS TRIBUNAL  
TAX APPEAL NO. 207 OF 2015**

**PARAGON ELECTRONICS LIMITED.....APPELLANT**

**VERSUS**

**COMMISSIONER OF DOMESTIC TAXES ..... RESPONDENT**

**JUDGEMENT**

**BACKGROUND**

1. The Appellant is a limited liability company under the provisions of the Companies Act (Chapter 486 of the Laws of Kenya) and was involved in Real Estate business and sale of electronic items up to May 2009 in the Kilimani area of Nairobi. The Appellant has developed property on L.R.No.2/425 while another development is ongoing in Thomson Avenue L.R.No.330/355 both in Kilimani.
2. The Respondent was established under the Kenya Revenue Authority Act, Cap 469 (KRA Act), as an agency of the government, for the purpose of collection and receipt of revenue. It is required to administer and enforce all provisions of the laws set out in the KRA Act for the purposes of assessing, collecting and accounting for all revenue in accordance with those laws.
3. The Appellant was aggrieved by the action taken by the Respondent in issuing the confirmation notice contained in its letter dated 8<sup>th</sup> April 2014 in relation to Value Added Tax (VAT).

