

**IN THE INCOME TAX APPELLATE TRIBUNAL
HYDERABAD ' B ' BENCH, HYDERABAD.**

**BEFORE SHRI A. MOHAN ALANKAMONY, ACCOUNTANT MEMBER AND
SHRI S.S. GODARA, JUDICIAL MEMBER
(THROUGH VIDEO CONFERENCE)**

ITA No.713/Hyd/2018 (Assessment Year : 2014-15)		
Income Tax Officer, Ward 4(3), Hyderabad.	Vs.	Shri Chinta Reddy Venugopal Reddy, 2-2-15, B-9, Flat 405, Bindu Prestige, D D Colony, Hyderabad. PAN ADMPC5044P
Appellant		Respondent

Appellant By : Shri Rohit Majumdar (D.R)

Respondent By : Shri K.K. Gupta.

Date of Hearing : 10.03.2021.

Date of Pronouncement : 06.05.2021.

O R D E R

Per Shri S.S. Godara, J.M. :

This Revenue's appeal for Asst. Year 2014-15 arises from the Commissioner of Income Tax (Appeals)-1, Hyderabad's order dt.20.12.2017 passed in case No.0210/CIT(A)-1/Hyd/2016-17/2017-18 in proceedings under Section 143(3) of Income Tax Act, 1961 ('the Act').

Heard both the parties. Case file perused.

2. We notice from a perusal of Revenue's pleadings at the outset that the sole substantive grievance seeks to revive the Assessing Officer's action treating the alleged cash deposit in assessee's savings account maintained with M/s. Vijaya Bank and State Bank of Hyderabad to the tune of Rs.97,70,700 and Rs.93,86,720; totaling respectively to Rs.1,91,57,420 as unexplained. The CIT(Appeals) lower appellate order has deleted the impugned addition as under :

5. Only ground is regarding addition of cash credits in bank accounts amounting to Rs.1,81,57,420/- under section 68 of the I.T. Act :

5.1 During the assessment proceedings, the Assessing Officer noticed that the assessee had cash deposits/time deposits in his bank accounts which is as follows:-

1. Vijaya Bank	Rs. 97,70,700/-
2. State Bank of Hyderabad	Rs. <u>93,86,720/-</u>
Total	Rs.1,91,57,420/-

The assessee submitted that the sources for cash deposits and time deposits are out of advances received for sale of agricultural land and out of own funds. The assessee submitted that he had entered in to agreement for sale of agricultural lands and received advances during the FY 2013-14. The Assessing Officer asked the assessee to submit the details of sale of agricultural land along with copies of agreement of sale/Registered deed etc. The assessee has submitted copies of agreements of sale entered on plain paper showing that the purchasers who are agricultural farmers (six in No.) from the native village of the assessee i.e. Eturu Village, Thirumalgiri Mandal Nalgonda District, given advance for purchase of agricultural land from the assessee during the Financial Year 2013-14.

The Assessing Officer issued summons to the following six farmers which were served through ITO Ward-1, Suryapet(commissions) :

1. Sri Petala Venkanna, S/o.Veeraiah, Eeturu Village.
2. Sri Kannebonina venkanna S/o Lingaiah
3. Sri Goisala Yadagiri S/o Mallaiah, Eeturu Village.
4. Sri Bandi Samabaiah, S/o Saailu, Eeturu Village.
5. Sri Chillara Chandramouli S/o SSILU, Eeturu Village.
6. Sri Moola Prasad S/o.Ramaswamy, Eeturu Village.

In response to the summons received, the farmers at S.No.5 and 6 namely Sri Moola Prasad and Sri Chillara Chandra Mouli, appeared and given sworn statements which were recorded on 08.12.2016.

5.2 The statement recoded is reproduced as given below –

SWORN STATEMENT OF **SHRI CHILLARA CHANDRAMOULI**, S/O.SAAILU, AGED 42 YEARS, R/o.EETURU VILLAGE, THIRUMALAGIRI MANDAL, NALGONDA DIST., RECORDED UNDERSECTION 131 OF THE INCOMETAX ACT,1961 ON 8.12.2016 IN CONNECTIONS WITH THE ASSESSMENT PROCEEDINGS OF SHRI VENUGOPAL REDDY CHINTA REDDY, FOR THE ASST.YEAR 2014-15.

1. Please introduce yourself ?

Ans: I am Chillara Chandramouli, S/o.Saailu aged 42 years residing at Eeturu Village, Thirumalagiri Mandal, Nalgonda Dist.

2. What is your profession/business and since how long you are carrying on the said profession/business?

Ans: I am agriculturist cultivating my Ancestral Land and aslo leased land at Eeturu Village.

3. What are your other Soruces of Inocme?

Ans: I am also Surpanch of Eeturu Village. I also undertake small contract works in and around my Village.

4. How much is your annual income? Are you an Income Tax Assessee? If so, please furnish your PAN details?

Ans: My annual income is Rs.4 to 5 Lakhs approximately from agricultural operations and upto Rs.2 Lakhs from other petty contract works. I don't have any PAN Card and I am not an income tax assessee.

5. Do you know Sri. Venugopal Reddy Chinta Reddy, if so, since how long and how?
Ans: I know Sri.Venugopal Reddy Chinta Reddy as he also belongs to my village and I am doing agricultural operations by taking his land on lease basis.
6. Have you given any advance to him towards purchase of agricultural land during the F.Y.2013-14? What is the made of giving advance?
Ans: Yes, I have given an amount of Rs.32,00,000/- towards advance for purchase of agricultural land (out of Rs.47,50,000/-) during the F.Y.2013-14. The payment was made in cash on various dates. I don't remember the dates.
7. I am showing you a letter dated 14.04.2013 being a plain agreement stated to have been made for purchase of agricultural land admeasuring 2.20 Acres, situated at Sy.No.226. Do you agree that it was given by you?
Ans: Yes, the said plain paper agreement was made in my presence.
8. Is the sale deed was executed? If so, please furnish copy of the same.
Ans: No, The sale deed is not executed so far.
9. Do you have any Bank Accounts evidencing the said advances? If so, please furnish the details of your Bank Accounts?
Ans: No, I don't have any bank account.
10. Do you have any other immovable properties?
Ans: Yes, I have only one house which was built by me in the year 2009.
11. What are your sources of income for the said transaction /purchase?
Ans: The same are out of income from agriculture and petty contract works.
12. Can you prove your sources of income with any evidence ?
And: I am furnishing copy of pattadar passbook as evidence for agricultural income and don't have any other evidence for income from contract works.
13. The said agreement was stated to have been entered in the year 2013 and till date nothing is done with regard to registration of the said land in your name? Do you have anything to clarify on this point?

Ans: As I did not pay full amount, the deed was not executed. It was agreed upon to register after full payment.

14. *Would you like to say anything further?*
Ans: No."

Based on this statement recorded, the Assessing Officer accepted the submission of Sri Chillara Chandramouli.

5.3 With regard to other farmers, the assessee submitted Affidavits along with their Aadhar card copies and confirmations. The details of Agricultural land owned by the farmers as per their statements/affidavits are given below:

S.No	Name	Agri Land holding area	Annual Income	Amount of advance claimed to have paid
1.	Sri Perala Venkanna	No details furnished	Filed affidavit with No annual income details	Rs.29.50 lakhs (out of Rs.44 lakhs)
2.	Sri Kanneboina Venkanna	4.03 acres	Filed affidavit with No annual income details	Rs.35 lakhs (out of 50 lakhs)
3	Sri Godisala Yadagiri	8.14 acres	Filed affidavit with No annual income details	Rs.39 lakhs (out of Rs.58.50 lakhs)
4.	Sri Bandi Samabaih	1.08 acres on his wife name	Filed affidavit with No annual income details	Rs.25 Lakhs (out of Rs.38 lakhs)
5.	Sri Chilara Chandramouli	4.27 acres	4 to 5 lakhs as per sworn statement	Rs. 32 lakhs (out of Rs.47.50 lakhs)
6.	Sri Moola Prasad	5.39 acres	5 to 6 lakhs as per sworn statement	Rs.42 lakhs (out of 63 lakhs)

In view of the above, the Assessing Officer noticed that :

- Out of 6 farmers, 4 farmers have not furnished their annual income details. One of the farmers Sri Perala Venkanna has neither submitted agricultural land details nor annual income details except confirming the transaction through affidavit
- Sri Kanneboina Venkanna filed copy of pattadar pass book with corrections in his name which cannot be verified.

- Sri Bandi Sambhaiah filed pattadar pass book copies in the name of his wife with a small land holding of 1.08 acres.
- None of the above persons have bank accounts and do not have PAN card.
- They simply confirmed the payment saying that they have made payments towards advances to the assessee. They do not remember the dates.
- They said advances claimed to have been given on various dates in the months of April and May 2013 and a period of 3 and half years elapsed but no deed of registrations were executed. The above persons are basically agriculturists and with an annual income of Rs.4 to Rs.5 lakhs. Some have neither submitted the annual income details/nor agricultural land details.

In the absence of the genuineness and creditworthiness of the farmers in giving cash advances to the assessee, the Assessing Officer issued show cause notice on 27.12.2016 to the assessee to submit his objections to treat the deposits as unexplained cash credits u/s.68 of the IT Act. In response, the assessee submitted that :

"It is to be stated that the sale of agricultural land in a village is to be considered for the purpose of genuineness unlike in towns where the banking facilities are available. The farmers in the village still transact in cash as there is no bank branch in the village. The criteria for genuineness in this case should not be PAN and bank account. The buyers clearly confirmed the proposed sale. In villages the delay in registrations and renegotiations is usual. Several sale and purchases of agricultural lands are still in the modes of payments are taking place even now. The assessee requests you to accept the explanation as the buyers have (two of them) appeared before you and confirmed the matter and other buyers have filed affidavits and confirmations."

3.4 After careful consideration of the assessee's submission, the Assessing Officer concluded as follows :

- a) As per the provisions of Section 68 of the IT Act, where any sum is found credited in the books of an assessee maintained for any previous year and the assessee offers no explanation about the nature and source thereof or the explanation offered by him is not satisfactory in the opinion of the assessing officer, the sum so credited may be charged to income tax as the income of the assessee of that previous year. The Assessing Officer relied on the following case laws :
 - a) Sumathi Dayal Vs CIT (SC) 214 ITR 801
 - b) S.Punjabi Vs ACIT (ITAT-Mad) 62 ITJ 749
- b) The criteria for cash credits for making additions u/s.68 of IT Act are as follows:
 - Identity;
 - Genuineness of the transactions;
 - Creditworthiness of the lender;
- c) In response to the summons, two of the farmers appeared and they are having only meagre annual income of Rs.4 to 5 lakhs with no bank account with no proof of payments made in the absence of which their genuineness and credit worthiness is not acceptable.
- d) The other 4 farmers have submitted affidavits with ID Proof without income details in the absence of which their genuineness and creditworthiness is not acceptable.
- e) The Assessing Officer relied on the following case laws :
 - In the case of M/s. Blow well Auto Pvt. Ltd Vs. ACIT(P&H) 11 DTR 91, it was held that assessee filed affidavits of creditors in which they confirmed loan transactions but did not disclose their sources of income. Since creditworthiness and genuineness of transactions not established, addition u/s.68 justified.

- In the case of Mangilal Jain Vs ITO(Mad) 315 ITR 105 wherein Madras High Court held that mere proof of identity is not sufficient since assessee failed to prove the genuineness of credit.
 - Shankar Industries Vs. CIT(1978) 114 ITR 689, wherein the Calcutta High Court came to the conclusion and as rightly held that for the burden of proof of genuineness, the assessee must prove not only the identity of the creditor, capacity of the creditor to advance money and genuineness of the transaction. A mere proof of identity of creditor is not sufficient.
 - In the case of ROhan Di Hatti Vs CIT and Khale khan Mohammad Hanif, the Apex Court held that the onus of proving a source of a sum of money found to have been received by the assessee is on him, when the nature and source of a receipt cannot be satisfactorily explained by the assessee, it is open to the revenue to hold that it is the income of the assessee and no further burden lies on the revenue to show that the income is from any particular source.
 - In the case of assessee more than 3 years elapsed the lands were neither registered nor were advance amounts returned to the alleged purchasers in the absence of which the genuineness of the transaction is not to be relied upon. This view was upheld by Punjab and Haryana HC in the case of Krishna Kumar Jhamb Vs ITO (17 DTR 249).
- f) It is also noticed that none of them had bank accounts. The assessee's contention that the village, they live in, do not have bank is not acceptable since what they have confirmed to have paid is not a small amount to be kept at the home and also for

which they do not have any details as a piece of evidence to furnish.

- g) Moreover, in the agreements of sale submitted it is mentioned that the said advances have already been paid and received (written in telugu) by the assessee i.e., in April and May 2013. Whereas the dates of huge cash deposits in Vijaya Bank and SBH varies from June 2013 to March 2014 which clearly establishes that the said deposits are not from advances from sale of agricultural lands and are from undisclosed sources.
- h) This is also to mention that all the above farmers are doing cultivation of the assessee's agricultural lands since a long time, hence what they have confirmed is only the accommodation entries in assessee's bank account as a form of cash advances towards purchase of agricultural lands.
- i) The assessee's contention that the cash deposits include Opening cash balance and consultancy income is not acceptable as no valid evidence is proved. However only agricultural income of Rs.10,00,000/- is accepted to have been paid through cash out of total deposits of Rs.1,91,57,420/-

In view of the above, the Assessing officer treated the cash deposits /fixed deposits of Rs.1,81,57,420/- as Income from undisclosed sources by applying the provisions of Section 68 of the IT Act.

- 5.5 Before me, **the appellant submitted** that certain cash deposits were made in his bank accounts, out of his income, savings and sale of agricultural land in his native village. The appellant submitted that the evidences were submitted before the Assessing Officer to support his claim. The appellant submitted that the Assessing Officer issued summons to the buyers of the agricultural land. The buyers, in compliance, appeared before the Assessing Officer and confirmed the fact of transactions of agreement for sale in the

village. However, the Assessing Officer formed opinion based on doubt/surmises and made addition.

The appellant submitted the details of amounts received from Vendees in respect of sale of Agricultural land, as follows :

S.No.	Name of the vendee	Agricultural land of his Family and leased land (Acres-Guntas)	Annual income from agriculture (Rs.)	Consideration received (Rs.)
1.	Sri Chillara Chandramouli	24-27	9,60,000	32,00,000
2.	Sri Moola Prasad	15-39	6,40,000	42,00,000
3.	Sri Kanneboina Venkanna	14-03	5,60,000	35,00,000
4.	Sri Godisala Yadagiri	18-14	7,20,000	39,00,000
5.	Sri Bandi Samabaiah	21-08	8,40,000	25,00,000
6.	Sri Perala Venkanna	19-20	7,80,000	29,50,000

5.6 The appellant submitted the following details, before me :

a) Copies of Affidavits dated 23.12.2016 of the following parties :

- Sri Bandi Sambaiah, Resident of Etooru Village, Tirumalagiri Mandal, Nalgonda District
- Sri Perala Venkanna, Resident of Etooru Village, Tirumalagiri Mandal, Nalgonda District
- Sri Godisala Yadagiri, Resident of Etooru Village, Tirumalagiri Mandal, Nalgonda District
- Sri Kanneboina Venkanna, Resident of Etooru Village, Tirumalagiri Mandal, Nalgonda District

b) Copies of Aadhar card and Pattadhar Pass book

- Sri Chillara Chandramouli S/o Sri Chillara Saielu, Eeturu Village
- Sri Moola Prasad S/o.Ramaswamy, Eeturu Village.
- Sri Kannebonina venkanna S/o Lingaiah, Eeturu Village.
- Sri Godisala Yadagiri S/o Mallaiah, Eeturu Village.
- Sri Bandi Samabaiah, S/o Saailu, Eeturu Village.

- Copy of Aadhar card of Sri Perala Venkanna, S/o.Veeraiah, Eeturu Village.

c) Income tax return for the AY 2014-15 of the appellant

5.7 Appellant submitted copies of receipts regarding agreement of sale given to the buyers mentioned above in telugu and certified on revenue stamp. The documents were translated into English and submitted before me. The details of document in case of Chillara Chandramouli, is as follows :

"This Agreement of Sale was executed o 14th day of April 2013 between Chintareddy Venugopal Reddy, Resident of Eturu village, Tirmalgiri Mandal, Nalagonda District, and Chillara Chandramouli, S/o Sailu, Resident of Eturu village, Tirmalgiri Mandal, Nalagonda District.

This Agreement of Sale witnessed that : I, Chintareddy Venugopal Reddy, have inherited agricultural land in survey no.226, from my father, I have decided and agreed to sell part of this land, admeasuring 2 Acre and 20 Guntas to Sri Chillara Chandramouli, S/o Sailu. The sale consideration agreed is Rs.19,00,000/- (Rupees Nineteen Lakhs) per acre. The total consideration for the said land works out to Rs.47,50,000/- (Rupees Forty Seven Lakhs Fifty Thousand). I have received an amount of Rs.32,00,000/- (Rupees Thirty Two Lakhs) as advance in cash. The balance of Rs.15,50,000/- (Rupees Fifteen Lakhs and Fifty Thousand) shall be payable by agreement holder after the harvesting of crops. After receiving the total consideration, I, Chintareddy Venugopal Reddy, shall transfer the agreed land onto your name (agreement holder – Sri Chillara Chandramouli), by conducting survey. In case the balance amount is not paid within the agreed period, the advance will not be refundable. This agreement is made out of freewill between the parties. Boundaries are : East : Kodari Anjaiah's land, West : Venguri Yellaiah's land, North: own land, South : BT Road."

This document was witnessed by 3 persons namely (1) K. Sayulu (2) Narasaiah & (3) Muthaiah.

Similar documents were also submitted regarding the following persons :

- (a) Sri Kanneboina Venkanna : Document was signed by Ch. Venugopal Reddy on revenue stamp for receipt of Rs.35,00,000/- and

witnessed by 4 persons namely (1) K.Sayulu (2) Mallaiah (3) V. Bikshapathi & (4) B. Yenkaiah.

- (b) Sri Perala Venkanna : Document was signed by Ch. Venugopal Reddy on revenue stamp for receipt of Rs.29,50,000/- and witnessed by 3 persons namely (1) Bandi Shambaiah (2) G. Yadagiri & (3) V. Bikshapathi.
- (c) Sri Moola Prasad : Document was signed by Ch. Venugopal Reddy on revenue stamp for receipt of Rs.42,00,000/- and witnessed by 2 persons namely (1) Bandi Shambaiah & (2) P. Venkanna.
- (d) Sri Godisala Yadagiri : Document was signed by Ch. Venugopal Reddy on revenue stamp for receipt of Rs.39,00,000/- and witnessed by 4 persons namely (1) Bandi Shambaiah (2) G. Yada Mallaiah (3) K. Sayulu & (4) Mallaiah.
- (e) Sri Bandi Shamaiah : Document was signed by Ch. Venugopal Reddy on revenue stamp for receipt of Rs.25,00,000/- and witnessed by 4 persons namely (1) M. Prasad (2) G. Yadagiri (3) Narsaiah & (4) V. Yenkaiah.

5.8 The **submissions of the appellant** have been carefully considered. Appellant has submitted that he is promoting educational institute in his village where he owned ancestral property/agricultural land. To generate money, he had sold the agricultural land to the agriculturists who were already doing agriculture on his behalf. As there is no bank in the village, no banking transactions could have been reflected. Also, since these are agricultural land sales and the buyers were agriculturists of the same village, the whole transactions have been in cash.

The appellant submitted agreement copies along with land sale and documentary evidence regarding the existence/identity of the buyers. The Assessing Officer has recorded statement of Sri Chillara Chandramouli and Sri Moola Prasad. However, in case of others, who do not appear before the Assessing Officer but documents submitted i.e. pattadar pass books and affidavits, were not accepted. The Assessing Officer has not accepted

the submissions of the appellant for want of bank account, details of payment not specified, pattadar book in the name of wife, annual income details not there. The Assessing Officer concluded that creditworthiness and genuineness of farmers was not there. The Assessing Officer, however, did not refute the absence of a banking facility in the village. The Assessing Officer himself has pointed out that three years lapsed from the purchase, this can be reason for the parties not able to mention the date of transaction. Beside, agricultural lands were sold to the tiller of the soil and such amount could have been over a period of time. The whole transaction as submitted by the appellant was based on faith and village tradition.

The appellant was able to give the details regarding the identity of the purchasers. In absence of a banking transaction in a place where the banking facility is not available, cannot be undermined the genuineness of the transaction. In regard to creditworthiness, the appellant submitted that these are fertile lands and were being under cultivation and generating income. The Assessing Officer has not able to cause verification by the local Agricultural Officer/Revenue Officer further regarding income from these agricultural land. In absence of proof that these lands could not have generated such income, it is difficult to not to accept the submission of the appellant.

The case laws referred by the Assessing Officer are correct in their own cases. Applicability of these cases and burden of proof also lies with the Department. While coming to conclusion, the Assessing Officer has referred to case laws of Rohan Di Hatti Vs CIT and Khale Khan Mohammad Hanif, the Assessing Officer should have made further enquiry before coming to conclusion. In absence of banking facility, it becomes difficult for the Revenue to take a stand regarding the genuineness of the transaction, unless further enquiry is being done by the Assessing Officer/Income Tax Inspector, to confirm the conclusion. Non-banking transaction of agricultural land sale has to be summarized with further investigation. This has not been done in this case. And the case laws referred cannot be referred.

In light of above, the appellant proved the identity of the buyers and genuineness of the transaction. The submission of the appellant is accepted and the addition made u/s.68 of Rs.1,81,57,420/- is deleted.

- Ground Allowed.

6. In the result, the appeal is **ALLOWED.**

3. We have given our thoughtful consideration to rival contentions against and in support of CIT(Appeals) above extracted findings. Learned departmental representative vehemently reiterated the Revenue's pleadings that the Assessing Officer has rightly made the impugned addition in assessee's hands. He took us to the detailed discussion in assessment order dt.29.12.2016 to this effect making it clear that the assessee had claimed the source of the cash and time deposits out of advances received for sale of the agricultural lands in the relevant previous year. He has produced the so called agreement(s) of sale on a plain paper involving 6 farmers / vendors from Eeturu village, Thirumalagiri Mandal, Nalgonda District. It is not in dispute as per the assessment order itself

that two farmers that Sri Moola Prasad and Chillara Chandramouli only got recorded their statements on 8.12.2015 and thereafter, the assessee also submitted affidavit(s) with aadhar card(s) and confirmations. The Assessing Officer observed in the light of each and every party, agricultural land holding, annual income and amount of advance claimed that the same lacked genuineness / credit worthiness and therefore he proceeded to make 68 addition which stands deleted in the CIT(Appeals) order.

4. Learned authorised representative contended in the light of CIT(Appeals) detailed discussion that cash transaction of sale / purchases of agriculture land already stand confirmed by way of affidavit(s) and statement(s) recorded before the Assessing Officer. On a query to the learned authorised representative to know as to whether the assessee has transferred the lands in question to the said vendees or not, the reply received is in negative only. Meaning thereby that the said 6 vendees had land holdings measuring NIL, 4 acres, 8 acres, 1 acre(wife), 4.2 acres and 5.39 acres as against the advances of Rs.29.50 lakhs;

Rs.35 lakhs; Rs.39 lakhs; Rs.25 lakhs; Rs.32 lakhs and Rs.42 lakhs respectively. All this detailed exercise carried out by the Assessing Officer sufficiently indicates that the assessee has failed to discharge his onus of genuineness / credit worthiness of the explanation rendered before the lower authorities. This is for the reason that even his own two vendees who had appeared before the Assessing Officer has made it clear that their annual income was around Rs.5 lakhs each only as against alleged advance of Rs.32 lakhs and Rs.42 lakhs; respectively. Hon'ble apex court land mark decision in **Sumati Dayal Vs. CIT** (1995) 214 ITR 801 (SC) and **CIT Vs. Durga Prasad More** (1971) 82 ITR 540 (SC) held long back that any explanation under the provisions of the Act has to be appreciated in light of human probability after removing all blinkers. When we apply the same to his facts and circumstances of the instant case, it is very much apparent that even a single penny has not come via banking channel followed by the grossly disproportionate source(s) of the so called vendees who have not even bothered to get six corresponding sale deeds registered even after a time

period of almost a decade. We therefore are of the opinion in view of all the facts and circumstances narrated in the preceding paragraphs that the CIT(Appeals) had erred in law & on facts in deleting the impugned addition of Rs.1,81,57,440 income from undisclosed sources. The same stands restored therefore.

5. No other argument has been raised before us.

6. This Revenue's appeal is allowed in above terms.

Order pronounced in the open court on 6th May, 2021.

Sd/-

(A.MOHAN ALANKAMONY)

Accountant Member
Hyderabad, Dt. 06.05.2021.

Sd/-

(S.S. GODARA)

Judicial Member

* Reddy gp

Copy to :

1.	Shri Chinta Reddy Venugopal Reddy, 2-2-15, B-9, Flat 405, Bindu Prestige, D D Colony, Hyderabad.
2.	Income Tax Officer, Ward 4(3), Hyderabad.
3.	Pr. C I T-1, Hyderabad.
4.	CIT(Appeals)-1, Hyderabad.
5.	DR, ITAT, Hyderabad.
6.	Guard File.

By Order

Sr. Pvt. Secretary, ITAT, Hyderabad.