

**IN THE INCOME TAX APPELLATE TRIBUNAL
AMRITSAR BENCH, AMRITSAR.**

**BEFORE SH. LALIET KUMAR, JUDICIAL MEMBER
AND DR. M. L. MEENA, ACCOUNTANT MEMBER**

**I.T.A. No. 565/Asr/2017
Assessment Year: 2014-15**

ITO,(Exemption), Amritsar. (Appellant)	Vs.	Gurdaspur Improvement Trust, Hanuman Chowk, Gurdaspur. [PAN: AAALG0202A] (Respondent)
---	------------	--

Appellant by	Sh. S. M. Surendranath, DR
Respondent by	Sh. Avish Mahajan, CA.

Date of Hearing	16.09.2021
Date of Pronouncement	20.09.2021

ORDER

Per Dr. M. L. Meena, AM:

Vide CBDT circular 17/2019 dated 8th August 2019, the income tax department has announced its policy decision not to file, or press, the appeals, before this Tribunal, against the appellate orders favourable to the assessee in the cases in which overall tax effect, including surcharge but excluding interest, is Rs 50,00,000 or less. This monetary limit, which was Rs. 20,00,000 till 7th August 2019, has been in effect enhanced by almost 2.5 times over the last year, and the relief is retrospective in nature inasmuch as it not only applies to future appeals but also to the pending appeals.

2. At the outset, the Id. Counsel for the assessee submitted that the appeal of the Revenue is not maintainable being involving tax payable of Rs.48,17,592/- as per assessment order by the assessee computed which is less than Rs.50 lac. In view of the

prescribed limit of CBDT Circular No. 17/2019 dated 8th August 2019, copy of computation is enclosed hereunder:

ITA No 565 / Ass. / 2017
Gurdaspur Improvement Trust


14. In view of the above discussion, the income of the assessee is worked out as under :-


1. Income, as shown in the income and expenditure account	Nil
2. Add: Addition as per para 10 above.	13759022
3. Add: Addition as per para 11 above.	2365186
4. Add: Addition as per para 12 above.	30090
5. Add: Addition as per para 13 above.	3285
6. Total Income	16157583
7. Rounded off	16157580

Income	Income Tax Payable	Educ. Cess.	Interest, 234A, 234B, 234C	Total Tax payable
16157580/-	4677274/-	140318	234A 0 234B 1589805 234C 0	6407397/-
Paid				
Balance payable	4677274/-	140318	234A 0 234B 1589805 234C 0	6407397/-


Assessed. Issue requisite documents. Charged interest under section 234A and 234B of the Income Tax Act, 1961. Penalty proceedings u/s 271(1)(c) have been initiated separately for concealing and furnishing inaccurate particulars of income.

(Parveen Batra)
Income tax Officer, (Exemptions)
Ward, Amritsar



Copy to the "A" 

Thus total tax effect is
Rs 4677274 + 140318 = 4817592
Hence tax effect is less than 50
Lacs.

 (24)

3. The Id. DR has no objection for the same.

4. Accordingly, this appeal being a low tax effect case, dismissed in limine without going into merits accordingly this revenue appeal is dismissed.

5. In the light of the above discussions, and in the light of the CBDT Circular dated 8th August 2019, this appeal, being involving tax effect of less than Rs 50 lakhs, is dismissed as withdrawn.

6. With the above observations, the appeal filed by the Revenue stand dismissed.

Order pronounced in the open court on 20.09.2021

Sd/-

(Laliet Kumar)
Judicial Member

Sd/-

(Dr. M. L. Meena)
Accountant Member

doc

Copy of the order forwarded to:

- (1) The Appellant
- (2) The Respondent
- (3) The CIT
- (4) The CIT (Appeals)
- (5) The DR, I.T.A.T.

True Copy
By Order