

IN THE INCOME TAX APPELLATE TRIBUNAL
Hyderabad ‘ B ‘ Bench, Hyderabad
(Through Video Conferencing)

Before Shri S.S. Godara, Judicial Member
AND
Shri Laxmi Prasad Sahu, Accountant Member

ITA No.354/Hyd/2019		
Assessment Year: 2014-15		
Dr. Chilukoti Veeramma, Nellore. PAN : AFDPC0881R.	Vs.	The Income Tax Officer, Ward – 4, Nellore.
(Appellant)		(Respondent)
Assessee by:		Shri S. Ramarao
Revenue by:		Shri Rohit Mujumdar
Date of hearing:		04.01.2022
Date of pronouncement:		06.01.2022

ORDER

Per S. S. Godara, J.M.

This assessee’s appeal for A.Y. 2014-15 arises from the Commissioner of Income Tax (Appeals), Tirupati’s order dated 03.01.2019 in ITA No.10197/2016-17/CIT(A)/TPT, involving proceedings u/s. 143(3) of the Income Tax Act, 1961 [in short, ‘the Act’].

Heard both parties. Case file perused.

2. We notice at the outset that the assessee’s twin substantive grounds seeking to reverse both the lower authorities’ action making unaccounted purchases / unexplained investments addition of Rs.9,80,000/- and interest thereon of Rs.1,88,000/-; respectively, do not require us to delve much deeper in the relevant factual matrix for the reasons given hereunder :

3. We next notice with the able assistance of both the parties that the assessee has filed additional documents before us containing the corresponding details of the plant / machinery in the nature of Fuji Computer Radiography with Lenovo Monitor that the same in fact belongs to Shri N. Mastanaiah and his wife, who have also filed the relevant details which were nowhere placed in the lower proceedings.

4. The assessee's case regarding the latter issue is that the interest income in issue has nowhere been received in the relevant previous year. Faced with this situation, we deem it appropriate to restore the assessee's twin substantive grounds back to the Assessing Officer for his afresh necessary factual verification as per law within three effective opportunities of hearing. Ordered accordingly.

5. This assessee's appeal is allowed for statistical purposes in above terms.

Order pronounced in the Open Court on 6th January, 2022.

Sd/- (LAXMI PRASAD SAHU) ACCOUNTANT MEMBER	Sd/- (S.S. GODARA) JUDICIAL MEMBER
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Hyderabad, dated 6th January, 2022.

TYNM/sps

Copy to:

S.No	Addresses
1	Dr. Chilukoti Veeramma, D.No.6/73, Main Road, Inamadugu, Kovur, Nellore District – 524001.
2	The Income Tax Officer, Ward – 4, Nellore.
3	CIT (A) – Tirupati.
4	Pr.CIT – Tirupati.
5	DR, ITAT Hyderabad Benches
6	Guard File

By Order