

**IN THE INCOME TAX APPELLATE TRIBUNAL
HYDERABAD BENCHES “SMC”, HYDERABAD
(THROUGH VIDEO CONFERENCE)**

BEFORE SHRI S.S.GODARA, JUDICIAL MEMBER

ITA No.16/Hyd/2022		
Assessment Year: 2017-18		
Gajjelareddy Krishnaveni, Anantapur. PAN : EPKPK0246F. (Appellant)	Vs.	The Income Tax Officer, Ward – 2, Anantapur. (Respondent)
Assessee by:	Sri K. A. Sai Prasad.	
Revenue by:	Ms. Sumitha.	
Date of hearing:	02/03/2022	
Date of pronouncement:	04/03/2022	

ORDER

Per S. S. Godara, J.M.

This assessee’s appeal arises from the National Faceless Appeal Centre (NFAC), Delhi’s order dated 24.11.2021 in case No. ITBA/NFAC/S/250/2021-22/103716788(1) involving proceedings u/s 143(3) of the Income Tax Act, 1961 [in short, ‘the Act’].

Heard both the parties. Case file perused.

2. Coming to the assessee’s sole substantive grievance challenging section 69A unexplained money addition of Rs.6,72,855/-, it emerges at the outset that from a perusal of the Assessing Officer’s order dt.18.12.2019 that he had also included opening balance of Rs.12,48,355/- whilst arriving at the

impugned sum. I therefore quote Ivan Singh Vs ACIT (2020) 422 ITR 128 (Bom) that such an addition could only be made qua the sum(s) in issue pertaining to relevant previous year than qua those found to have been credited in earlier assessment year only. I accordingly delete the impugned addition for this precise reason alone. All other pleadings on merits are rendered academic. The Revenue fails in its sole substantive grievance supporting impugned addition.

3. This assessee's appeal is allowed in above terms.

Order pronounced in the Open Court on 04th March, 2022.

Sd/-
(S.S.GODARA)
JUDICIAL MEMBER

Hyderabad, dated 04th March, 2022.

TYNM/sps

Copy to:

S.No	Addresses
1	Gajjelareddy Krishnaveni, C/o. Katrapati & Associates, 1-1-298/2/B/3, 1 st Floor, Ashoka Nagar, Hyderabad – 500 020.
2	The Income Tax Officer, Ward – 2, Anantapur.
3	The Commissioner of Income Tax (Appeals), National Faceless Appeal Centre (NFAC), Delhi.
4	DR, ITAT Hyderabad Benches
5	Guard File

By Order