

addition of Rs.13,18,285/-. They have taken recourse to the impugned estimation for the sole reason that the assessee had failed to produce her corresponding fuel sale bills in petrol pump business in lower proceedings. Suffice to say, the Assessing Officer had quoted three comparable instances to make the impugned estimation @0.43%.

4. I have given my thoughtful consideration to rival pleadings against and in support of the impugned estimation and find no reason to accept either parties' arguments in entirety. This is for the sole reason that neither the assessee has been able to cite her cogent reasons in expressing her inability to produce all the corresponding sale bills nor the Assessing Officer and the CIT(A); as the case may be, have taken any effort to check the stock register figures in issue.

Faced with this situation, I deem it appropriate that larger interest of justice would be met in case the impugned addition of Rs.13,18,285/- is restricted to a lumpsum figure of Rs.3 lakhs in the given facts and circumstances, with a rider that the same shall not be treated as a precedent. I order accordingly. Consequential computation to follow as per law.

5. This assessee's appeal is partly allowed in above terms.

Order pronounced in the open court on 8th March, 2022

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

Hyderabad, Dated: 08-03-2022

Copy to :

1.Smt.Chandra Kanta Bung, D.No.20-2-250, Old Kabutarkhana, Hyderabad.

2.The Income Tax Officer, Ward-9(2), Hyderabad.

3.CIT(Appeals)-7, Hyderabad.

4.Pr.CIT-7, Hyderabad.

5.D.R. ITAT, Hyderabad.

6.Guard File.