IN THE INCOME TAX APPELLATE TRIBUNAL
JABALPUR BENCH, JABALPUR

BEFORE SHRI SANJAY ARORA, HON'BLE ACCOUNTANT MEMBER &
SHRI MANOMOHAN DAS, HON'BLE JUDICIAL MEMBER

I.T.A. No. 63/JAB/2019
(Asst. Year: 2010-11)

Income Tax Officer, Ward-1(3), Jabalpur.	vs.	Sudhir Kumar Rawat, 757, Satna Building, Gole Bazar, Jabalpur (MP) [PAN : ADYPR 6449 K]
(Appellant)		(Respondent)

C.O.No. 02/JAB/2022
(arising out of I.T.A. No. 63/JAB/2019)
(Asst. Year: 2010-11)

Sudhir Kumar Rawat, 757, Satna Building, Gole Bazar, Jabalpur (MP) [PAN : ADYPR 6449 K]	vs.	ITO, Ward-1(3), Jabalpur.
(Applicant)		(Respondent)

Assessee by	:	Shri Sapan Usrethe, Advocate & CA Apoorva Agrawal
Respondent by	:	Shri Ravi Mehrotra, Sr. DR
Date of hearing	:	23/06/2022
Date of pronouncement	:	29/07/2022

O R D E R

Per Sanjay Arora, AM:

This is an Appeal by the Revenue and Cross Objection (CO) by the Assessee directed against the Order dated 09/05/2019 by the Commissioner of Income Tax (Appeals)-1, Jabalpur ('CIT(A)' for short), cancelling the levy of

penalty under section 271D of the Income Tax Act, 1961 ('the Act' hereinafter) for Assessment Year (AY) 2010-11 vide order dated 28/07/2017. The assessee's CO, in view of the relief allowed by the ld. CIT(A), is supportive of his order and, besides, raises legal issues which, though raised before him, were not adjudicated.

2. The brief facts of the case are that the assessee was show-caused on 10/02/2017 in respect of an alleged violation of section 269SS of the Act for having received Rs.15.50 lacs from one, Sangeeta Rawat, in cash, on 25/8/2009, i.e., during the relevant previous year (f.y. 2009-10). Satisfaction for the same, it is a common ground before us, was recorded by the Assessing Officer (AO) during the course of the assessment proceedings for the relevant year, followed by his moving the competent authority, i.e., Joint Commissioner, with the proposal for the initiation of the penalty proceedings on 12/4/2016, also informing the asseessee (PB pg. 8). This was followed by another notice on 24/07/2017. The assessee responded to both, within the time allowed, stating that he had not received any amount in cash from Sangeeta Rawat (SR), his wife, during the relevant year. The penalty proceedings, therefore, warranted being dropped. Without prejudice, it was explained that SR had sold a shop (No.7, Dutt Tower, Napier Town, Jabalpur), purchased by her on 18/12/2007, to one, Ratna Verma (RV), during the year (date not specified). The sale consideration (not specified) was, however, received from the said buyer by the assessee, her husband. It was this money, belonging to his wife, which was returned to her by the assessee, albeit in cash, on 25/08/2009. Further, as however both the assessee and his wife maintained books of account, the transaction of receipt, as well as payment, in cash or through bank, found reflection by way of credit and debit entries in her account in the assessee's books, with corresponding entries in the books of his wife, SR. It is therefore not a case of loan or deposit of money, so as to attract the provisions of s. 269SS/T (PB pgs.10-15). The Jt. CIT, i.e., the competent authority to levy penalty u/s. 271D/E, i.e. for violation of provisions of s.269SS/T, levied penalty u/s. 271D (for violation of

provisions of s.269SS). Section 269-SS and 269-T of the Act proscribe acceptance and repayment of any loan or deposit of money, beyond a threshold limit, other than by way of account payee cheque or account payee bank draft by the payer/depositee to the payee/depositor, for which default penalty, in the sum so received or paid, is liable to be levied u/s. 271D and s. 271E respectively in case reasonable cause is not proved (s. 273B). In his view, Annexures A & B to the assessment order, being the ledger accounts of the assessee and his wife (in each other's books), clearly reflected the assessee to have received cash on 25/08/2009 from his wife, SR, who had withdrawn money from her bank account, and for which no explanation had been offered. In appeal, the assessee reiterated both the grounds before the first appellate authority, i.e., of the penalty being levied on wrong facts; there being no violation of s.269SS, for which penalty u/s. 271D is initiated, inasmuch as he had not received any money in cash from his wife and, without prejudice, that he had in fact paid money (cash) to his wife, returning thus the amount received on her behalf on the sale of property. The legal issue with regard to the penalty being time barred in terms of s.275 of the Act was also raised. The ld. CIT(A), after recording the observations of the AO as well as assessee's detailed reply dated 13/02/2019 before him, allowed the assessee's appeal, holding as under:-

> "7.1.4 The actual fact involved in the case is that the wife of appellant Mrs. Sangeeta Rawat sold an immovable property. The part consideration was received by the appellant in cash on behalf of his wife and as the property was in the name of wife, the sale consideration was returned back to the wife. These transactions relate to AY 2010-11 and at that time, there was no restriction on receiving the sale consideration in respect of immoveable property in cash. The bar of accepting the cash above Rs.20,000 was imposed only after 01.06.2015. It was not a deposit. It was money which belonged to the wife of the appellant which was received by appellant on her behalf and was subsequently handed over to her. This was transaction in respect of immovable property and there was no bar in accepting cash in respect of transaction in immovable property. Such restriction came after 01.06.2015. Thus there was no violation of law.

7.1.5 The contention of the appellant as well as penalty order has been considered. The appellant received the money on behalf of his wife. The transactions between appellant and his wife have been recorded in the books of account of the appellant and there was no concealment of the income. The AO has levied the penalty stating that the said transactions cannot be treated in the nature of current account and the payments were made in cash. A plain reading of section 271D gives an impression that if there is contravention of the provisions of section 269SS, the appellant shall be liable to pay the penalty equal to the amount which has been taken as loan or deposit and there is no discretion left with the assessing authority to waive the penalty considering the facts and circumstances in which the loan or deposit was taken by the appellant. But when on reads S.271D with S.273B, which belongs with the provisions of S.271D", it is clear that the in spite of provision of S.271D. The enactment following, namely, "no penalty shall be imposable on the person or the appellant, as the case may be, for any failure referred to in the said provisions if he proves that there was reasonable cause for the said failure", will have its full operation. As per sec 2731B a penalty provided under s.271D cannot be imposed if the assessee or the person proves before the assessing authority that there was a reasonable cause for not accepting the amount of loan or deposit by way of account payee cheque or account payee bank draft. So, it is to be seen that whether there existed reasonable cause for entering into the said transactions. In present case, the funds have been received by the husband and same is handed over to his wife. The above explanation is *bona fide* explanation and constitutes a reasonable cause under section 273B of the Act.

7.1.6 ………. Therefore, the penalty imposed by the AO under section 271D amounting to Rs. 15,50,000/- is not sustainable and is cancelled. Therefore, the appeal on these grounds is allowed.

Aggrieved, both the parties are in appeal before us, with the assessee raising several grounds per his CO.

3. We have heard the parties, and perused the material on record.

3.1 It is clear, therefore, that the ld. CIT(A) allowed the assessee's appeal with reference to and on grounds other than that assumed by the assessee before him, i.e., *de hors* the assessee's case. He does answer the challenge to the penalty on the ground of limitation (s. 275(1)(c)), nor of it being in fact not a case of *acceptance* of loan or deposit in cash, constituting a default u/s. 269SS, which could be liable

for penalty u/s. 271D. He decides the assessee's appeal on his without prejudice ground, i.e., of the amount *repaid* by the assessee to SR in cash, in apparent violation of s. 269-T and, further, of it being not a loan or deposit within the meaning of s. 269SS/T. That is, accepts the plea in respect of a penalty u/s. 271E, justifying it on the basis that the bar on the acceptance of cash against the sale of immovable property was effective 01/6/2015. Though he does mention at para 7.1.5 of his order that the assessee received money on behalf of his wife, and which was returned to her in cash, the same is, even as admitted by Shri Usrethe, the ld. counsel for the assessee, not based on any material on record either before him or before the AO.

3.2 We shall proceed by considering the adjudication by the first appellate authority. None of the grounds on which the penalty has been deleted (though stated as 'cancelled'), is, in our view, tenable. The assessee's case is not of the transaction being not non-genuine or of a *bona fide* belief or non-concealment of income, toward which various decisions stand relied upon by the ld. CIT(A) at para 7.1.6 of his order. Penalty u/s. 271D (or for that matter u/s. 271E) has nothing to do with income and, therefore, concealment or otherwise of income and, further, can only be in respect of admitted or proved transactions. A non-genuine transaction is by definition not a real or actual transaction, so that levy of penalty on its basis would be a contradiction in terms. The assessee has not stated any reasonable cause for payment to his wife in cash, which could well have been through the prescribed mode of account payee cheque or account payee bank draft. And neither it is the case of he having received a part of the sale consideration in cash, as the ld. CIT(A) states (see Ann. A/B to the assessment order). On the contrary, what the assessee states, albeit without substantiating it in any manner, is that it is not a loan or deposit of money at all, but only a return back to his wife the money received by him from another on her behalf. Though the ld. CIT(A) states so at para 7.1.5 of his order, the same, is *de hors* any material on record. As afore-

noted, no reason stands advanced for repayment in cash. That apart, as afore-stated, the penalty thus 'cancelled' by him is u/s. 271E, while the penalty levied is u/s. 271D.

3.3 The assessee's claim of the penalty proceedings being out of time u/s. 275 is again without basis, as the time limitation, as per clear provision of s. 275(1), would run from the date of the initiation of the proceedings by the competent authority, which is on 10/02/2017. The letter dated 12/04/2016 by the AO intimating the assessee the proposal for initiating penalty proceedings u/s. 271D is a process anterior to the initiation of the penalty proceedings and, thus, the argument of the time limitation running therefrom cannot be accepted. Initiation of proceedings, it may be appreciated, can only be by the competent authority, i.e., Jt. CIT, Range-1, Jabalpur in the instant case and, thus, is the initiation contemplated u/s. 275(1). The letter dated 12/04/2016 is at best to elicit a response from assessee which, on consideration, may result in dropping the penalty proceedings, i.e., at the proposal stage itself. In fact, if the assessee's reply thereto was properly considered, applying his mind thereto, as indeed to the reply prior thereto to the Revenue Audit Party (RAP) raising the audit objection, the AO may well have written to the competent authority for not proceeding with the initiation, or changed his proposal to levy of penalty u/s. 271E instead.

3.4 We may next examine the assessee's principal case, i.e., that the impugned penalty is not maintainable in law as the assessee has in fact not received Rs. 15.50 lacs in cash from SR on 25/8/2009 (or any other sum in cash during the year), so that the question of breach of sec. 269SS, for which penalty u/s. 271D could be levied, as has been, does not arise. The Revenue's case is that a mere wrong mention of the section (provision of law) would matter little; it being an admitted fact that the assessee has paid Rs. 15.50 in cash to SR on 25/8/2009, and *qua*

which, being in contravention of s. 269T, no explanation has been furnished at any stage, liable for penalty u/s. 271E.

The primary facts are not in dispute. We may, however, for the sake of clarity, enclose the copy of the ledger account of SR in the books of account of the assessee, forming in fact part of the assessment order as Annexure A thereto, as Ann. A1 to this order. The same agrees with the copy of the assessee's account in the books of SR (Ann. B), as Ann. A2. As per the same, the credit balance of SR in the accounts of the assessee as on 25/8/2009, the date of cash payment to her, is Rs. 12,17,500. The same is clearly incorrect as it does not include Rs. 8,00,000 admittedly received by the assessee (for and on behalf of SR) on 10/6/2009, which stands though accounted for (by both) on 26/8/2009, the date of sale. This was, as explained by Sh. Usrethe, as both the cheques received for the buyer (RV); the second being for Rs. 8.40 lacs on 26/8/2009, were firstly credited to the account of RV, and the entire sum of Rs. 16.40 lacs standing to the credit of RV on 26/8/2009 transferred through journal entry to the account of SR, the seller, to whom the amount actually belonged. The transfer of funds, received for or on her behalf, to the account of SR by the assessee being with a time lag, the correct account position is as:

- Credit balance (correct) of SR as on 10/6/2009: Rs. 15,17,500
- Credit balance (correct) of SR as on 24/8/2009: Rs. 20,17,500
- Credit balance (correct) of SR as on 25/8/2009: Rs. 4,67,500

The credit balance of SR in the assessee's account at the close of 24/8/2009, i.e., immediately prior to the cash payment of Rs. 15.50 lacs to her on 25/8/2009, is thus rs. 20.175 lacs, of which rs. 8 lacs represents part sale consideration received from RV. The entire of this payment (Rs. 15.50 lacs) is therefore only in satisfaction of the amount standing to the credit of SR, who is thus only receiving back her money from the assessee. The same could, if at all, attract penalty u/s. 271E for violation of s. 269T, and there is no question of contravention of s.

269SS, i.e., for acceptance of money other than per the prescribed mode/s, which attracts s. 271D. *The assessee's explanation of the amount repaid being not a loan or deposit, but only a return back of funds received on behalf of SR, is, even accepting the argument, valid only for Rs. 8 lacs*.

So however, in our view, the penalty as levied is unsustainable in law in the absence of the jurisdictional fact, i.e., the acceptance of money in the sum of Rs. 15.50 lacs (or for that matter in any sum) in cash by the assessee from his wife Sangeeta Rawat on 25/08/2009 (or at any time during the relevant year), which could be said to be violative of s. 269SS, for which the law provides for levy of penalty u/s. 271D in absence of a reasonable cause being proved. As the ledger accounts of the assessee and his wife, forming part of the assessment order as annexures thereto, reveal, the assessee has in fact paid Rs. 15.50 lacs in cash to his wife and, further, is the only cash transaction between the two. We are conscious that a mere wrong mention of a section (provision of law), as long as the authority has the power in exercise of which the relevant judicial action has been taken, would not defeat the same. This, however, is not the case here. That, for instance, would be the case where the assessee had indeed received cash from or on behalf of his wife, attracting a penalty u/s. 271D, while the authority had, stating the facts constituting the default correctly, mentioned s. 271E instead.

3.5 We next examine the assessee's without prejudice claim, pressed emphatically before us, and on which also the assessee found favour with the ld. CIT(A). On Shri Usrethe being conveyed by the Bench that there is nothing on record to evidence his case, he would make an oral plea for admission of additional evidence. The same, fairly not objected to by the Revenue, was allowed considering that the said plea represents the assessee's consistent stand throughout, and the material sought to be relied upon, i.e., the sale deed dated 26/08/2009, and the assessee's bank statement (for the period 01/3/2008 to 29/10/2009), are both contemporaneous evidences. It was though made clear to Shri Usrethe that

inasmuch as there has been no verification of the assessee's claim, made *sans* any material, the matter, where otherwise satisfied, shall have necessarily to be remitted back to the file of the AO for verification.

Shri Usrethe would then, with reference to the sale deed and the assessee's bank statement, both bearing mention of the relevant cheque numbers, i.e., per which the sale consideration of Rs. 16.50 lacs stands paid by the buyer (RV), exhibit that the sale consideration stands received by the assessee from the buyer. The same being the property of his wife, SR, though received in his bank account, was returned forthwith, albeit in cash. It was, on that basis, contended to be not a case of repayment of a loan or deposit. The plea, impressive at first blush, is full of gaping holes and, in fact, misleading. Even ignoring the fact that the second cheque (the first being for Rs. 8 lacs) is for Rs. 8.40 lacs, as against it's mention in the sale deed as for Rs. 8.50 lacs, *the question is why would a buyer pay the sale consideration to the assessee, a third person as far as this transaction is concerned*? This becomes even more striking when considered in the context of the fact that both the assessee and his wife are Advocates, well aware of the legal implications. Further, there is no reference to the payment being made to the seller's spouse in the sale deed. Further still, the assessee receives the amount only to repay it back to his wife, again making both the transactions, i.e., the receipt of his wife's money by him (in bank) and returning to her (in cash), incomprehensible. Be that as it may, it is then, on that basis, said that the money belonged to SR, and having been received by the assessee on her behalf by the assessee, credited in his books to her account, so that it is not a loan or deposit. This statement, as afore-noted, is valid only for rs. 8 lacs received by the assessee on 10/6/2009, i.e., upon correcting the account statement as presented. Money belonging to one, received by another, without any underlying economic transaction, is a loan or deposit of money by definition, the term being defined, for the purpose of these provisions, in the broadest terms. It is immaterial whether it is

received directly or indirectly (as in the instant case). *The sale of property represents the stated source of money with the creditor-depositee (SR), which is though irrelevant from the standpoint of the mode of payment*. It is nobody's case that the money accepted and, therefore, returned back (after 75 days), did not belong to the creditor. That is, it is a deposit of money none-the-less, and no less a deposit than if the same was accepted from SR directly. *Rather, it is the indirect receipt of money that the relevant provisions in effect seek to proscribe and penalize*. That is, by stipulating the condition of 'account payee cheque' or 'account payee bank draft', so that the transfer of funds, admissible u/ss. 269SS/T, is directly from a bank account of one (payer) to the other (payee). A credit to another's account by way of bank transfer only signifies receipt of money from the other. As such, nothing turns on the fact that the money received belongs to SR, with, as afore-said, it being accepted indirectly (i.e., from RV) makes it in contravention of s. 269SS inasmuch as RV, the payer, is a third party as far as the assessee and SR, the debtor and creditor are concerned. RV, by making the payment, is only discharging her contractual obligation to SR under the sale agreement, who receives the same in her own right, though chooses to, for reasons best known to her, direct payment thereof to the assessee, or, endorses the 'crossed' cheque/s in her name in his favour. The same is itself liable to penalty u/s. 271-D.

Further still, it is not the said deposit, but its repayment, stated to be at Rs. 15.50 lacs, in cash, that stands impugned. *There is no explanation at any stage as to why the same was paid back in cash, which is the default being sought to be penalized, and toward which the assessee is to show a reasonable cause*. There was no answer forthcoming during hearing as to why and how did the assessee receive the amount, and why it was repaid in cash, retaining a part (rs. 0.9 lac). This is apart from the fact that the transaction is unexplained as to its rationale. That the assessee should hold cash in that sum and, further, choose to repay his

wife therefrom, is again most surprising. No urgency has been shown, much less contended, in which case, rather, the money ought to have been received by SR, the seller, herself, rather than being routed through her husband. And there being no bar in law for receipt of sale consideration in cash, as the ld. CIT(A) observes, could have also been insisted to be in cash, in whole or in part. Further, if the money was required by the assessee, all that was required was to obtain a loan/ deposit from his wife, SR, per the prescribed modes, upon her first receiving the money from the payer (RV) directly; she having in fact already given loan/deposit to the assessee.

The whole transaction, besides raising several questions, which remain unanswered, rings untrue. This also explains the non-mention of the date (26/8/2009) and amount (Rs. 16.50 lacs) of sale in the assessee's explanation before the AO or the competent authority, besides not furnishing any evidence in substantiation. The date of payment (25/8/2009) being before the date of sale, it would fail the assessee's case of the money received from the buyer on sale having been returned back to the owner. The bank transfer to the assessee's account on 26/8/2009 is at a total of Rs. 26.40 lacs, i.e., including Rs. 10 lacs from one, Pushpa Rathi, which appears to be connected, and of which there is no whisper. The assessee also misled the ld. CIT(A) into believing that a part of the sale consideration was received in cash, which was being returned to her, while the entire sale consideration, except perhaps Rs. 10,000 (unaccounted), stands received in the assessee's bank account. It is this that led him to state of there being no bar on the receipt of sale consideration of immovable property in cash. The transaction is not substantiated by the tax return of SR for the relevant year, a practising Advocate with independent source of income, as clarified by Shri Usrethe during hearing. Two, considering that the assessee receives the sale consideration, it may well be the case that the property was purchased by his wife out of monies belonging to the assessee, in which case the money belongs to the

assessee himself, in which case the repayment of Rs. 15.50 lacs on 25/08/2009 is only against credits outstanding as on that date (Rs. 12.175 lacs), with the balance being a fresh loan or deposit by him to his wife (Annexures A/B). The entire case is a make-believe and, in the absence of a request by SR (seller) to RV (buyer) to make the payment of the sale consideration to the assessee, her husband, and a confirming statement from the latter (RV), a non-starter. Even so, there is no explanation for the admitted cash payment by the assessee to SR.

4. The assessee has placed on record several decisions, none of which was referred to during hearing, nor, consequently, responded to by the other side. The same, therefore, cannot, in terms of r. 18(6) of the Income Tax (Appellate Tribunal) Rules, 1963, form part of the Tribunals' record.

5. We, accordingly, hold as under:

a). the penalty u/s. 271D, though not time barred, is not maintainable in the absence of the necessary jurisdiction (see: *Pr. CIT v. Maruti Suzuki Ltd.* [2019] 416 ITR 613 (SC); *Deep Chand Kothari v. CIT* [1988] 171 ITR 381 (Raj)).

b). the penalty levied is for the default specified u/s. 269-T, and though merited on the whole sum and, in any case, part thereof, is not sustainable in the absence of any penalty having been initiated or levied u/s. 271-E.

6. We, in view of the foregoing, vacate the findings by the ld. CIT(A), and hold both the initiation and levy of penalty u/s. 271D in the instant case as without jurisdiction and, thus, annul the same. The Revenue, where so advised, is at liberty to initiate penalty u/s. 271-E of the Act. We decide accordingly.

7**.** In the result, the Revenue's appeal is dismissed and the assessee's CO is partly allowed.

Order pronounced in open court on July 29, 2022

Sd/-	Sd/-
(Manomohan Das)	(Sanjay Arora)
Judicial Member	Accountant Member

Dated: 29/07/2022

vr/- Encl: Annexures A1 & A2 form an integral part of this Order.

Copy to:

1. The Assessee: Sudhir Kumar Rawat, 757, Satna Building, Gole Bazar, Jabalpur (MP).
2. The Department: ITO, Ward-1(3), Jabalpur.
3. The Principal CIT-1, Jabalpur.
4. The CIT(Appeals)-1, Jabalpur.
5. The Sr. DR, ITAT, Jabalpur.
6. Guard File.

By Order

(VUKKEM RAMBABU)
Sr. Private Secretary,
ITAT, Jabalpur.

MR SUDHIR RAWAT **Annexure-1**

Ledger Account Mrs. Sangeeta Rawat
1-Arp-2009 to 31-Mar-2010

Date	Particulars		Vch. Type	Vch No.	Debit (Rs.)	Credit (Rs.)
01/04/2009	Dr	Opening Balance			2,17,500.00	
15/04/2009	Cr	SBI CC A/c No.30738910746 Ch. No. TRF IN FAVOUR OF DUTT ASSOCIATES	Payment	2	4,00,000.00	
22/05/2009	Cr	SBI C.C. A/C NO. 30738910746 Ch. No. TRF IN FAVOUR OF DUTT ASSOCIATES	Payment	3	1,00,000.00	
23/05/2009	Cr	SBI C.C. A/C NO. 30738910746 Ch. No. TRF IN FAVOUR OF DUTT ASSOCIATES	Payment	4	5,00,000.00	
25/08/2009	Dr	Cash By CASH	Receipt	2		15,50,000.00
26/08/2009	Cr	(as per details) MRS PUSHPA RATHI 10,00,000 Cr MRS RATNA VERMA 16,40,000 Cr TRFD	Journal	3	26,40,000.00	
24/10/2009	Dr	Cash HDFC Bank 802522	Receipt	1		25,000.00
12/11/2009	Dr	Cash HDFC Bank 802526	Receipt	1		10,600.00
24/02/2010	Dr	Cash HDFC Bank 843295	Receipt	1		35,000.00
25/02/2010	Dr	Cash HDFC Bank 843296	Receipt	2		15,000.00
02/03/2010	Dr	Cash HDFC Bank 843289	Receipt	1		35,000.00
	Dr	Closing Balance			38,57,500.00	16,70,600.00 21,86,900.00
					38,57,500.00	**38,57,500.00**

Annexure-2

MRS SANGEETA RAWAT

Ledger Account

1-Arp-2009 to 31-Mar-2010

Date	Particulars		Vch. Type	Vch No.	Debit (Rs.)	Credit (Rs.)
01/04/2009	Cr	Opening Balance				2,17,500.00
15/04/2009	Dr	DUTT ASSOCIATES TRF ABI A/c. 30738910746	Journal	1		4,00,000.00
22/05/2009	Dr	DUTT ASSOCIATES TRF ABI A/c. 30738910746	Journal	1		1,00,000.00
23/06/2009	Dr	DUTT ASSOCIATES TRF ABI A/c. 30738910746	Journal	3		5,00,000.00
25/08/2009	Cr	Cash By CASH	Payment	2	15,50,000.00	
26/08/2009	Dr	(as per details) MRS PUSHPA RATHI 10,00,000 Dr MRS RATNA VERMA 16,40,000 Dr TO SHOP NO.7 SALE AMOUNT TRF	Journal	1		26,40,000.00
24/10/2009	Cr	HDFC A/c No.02241600002085 Ch. No. 802522	Payment	7	25,000.00	
13/11/2009	Cr	HDFC A/c No.02241600002085 Ch. No. 802526	Payment	5	10,600.00	
24/02/2010	Cr	HDFC A/c No.02241600002085 Ch. No. 843295	Payment	8	35,000.00	
25/02/2010	Cr	HDFC A/c No.02241600002085 Ch. No. 843296	Payment	9	15,000.00	
02/03/2010	Cr	HDFC A/c No.02241600002085 Ch. No. 843289	Payment	1	35,000.00	
	Cr	Closing Balance			16,70,600.00 21,86,900.00	38,57,500.00
					38,57,500.00	**38,57,500.00**