

**IN THE INCOME TAX APPELLATE TRIBUNAL
INDORE BENCH, INDORE**

(CONDUCTED THROUGH VIRTUAL COURT)

**BEFORE Ms. MADHUMITA ROY, JUDICIAL MEMBER &
SHRI BHAGIRATH MAL BIYANI, ACCOUNTANT MEMBER**IT(SS)A No.212/Ind/2021
(Assessment Year: 2018-19)

ACIT, Central-2, Indore	Vs.	M/s. Mayur Industries, Khandwa
स्थायी लेखा सं./जीआइआर सं./PAN/GIR No. : ABEFM 4664 K		
(Appellant)	..	(Respondent)

Revenue by :	Shri P. K. Mishra, CIT.D.R.
Assessee by :	Shri S.N. Agrawal, CA

Date of Hearing	19.12.2022
Date of Pronouncement	15.03.2023

O R D E R**PER Ms. MADHUMITA ROY - JM:**

The instant appeal filed by the Revenue is directed against the order dated 26.08.2021 passed by the Ld. CIT(A)-3, Bhopal (M.P.) (hereinafter referred to as 'Ld. CIT(A)') arising out of the order dated 30.12.2019 passed by the DCIT (Central)-2, Indore (hereinafter referred to as 'Ld. AO') under Section 143(3) of the Income-Tax Act, 1961 (hereinafter referred to as 'the Act') for Assessment Year (hereinafter referred to as 'A.Y.') 2018-19 with the following ground:

“1. On the facts and in the circumstances of the case, the Ld. CIT(A) erred in law in deleting the additions amounting to Rs. 2,59,28,791/- for the A.Y. 2018-19 made by the Assessing Officer on account of capital introduced by partners, treating the same as unexplained cash credit u/s 68 of the I.T. Act, 1961.”

2. The assessee is a partnership firm engaged in the business of running of a flour mill. On 23.01.2018, a search and seizure operation under Section 132 of the Act was carried out at the business premises as well as residential premises of MG Oils Group of Khandwa including the assessee and other concerns/business associates on 23.01.2018. Thereafter, notices under Section 153A of the Act were issued for the A.Y. 2012-13 to 2017-18 and notice under Section 143(2) of the Act was issued for the A.Y. 2018-19. The income-tax return of the assessee for the A.Y. 2018-19 was filed on 31.10.2018 claiming loss of Rs. 39,82,122/-. The Ld. AO during the course of assessment proceedings observed that the assessee did not submit any documentary evidences regarding source of capital introduced by its partners and accordingly made addition of Rs. 2,59,28,791/- to the total income of the assessee on account of capital introduced by partners by treating it as unaccounted and unexplained credit under Section 68 of the Act. The same was deleted by the Ld. CIT(A) in appeal preferred by the assessee. Hence, the instant appeal has been filed before us.

3. The Revenue through this sole ground of appeal has challenged the deletion of addition of Rs. 2,59,28,791/- made by the Ld. AO on account of capital introduced by partners by treating it as unaccounted and unexplained credit under Section 68 of the Act.

4. The brief fact leading to the case is this that the Ld. AO during the course of assessment proceedings observed that all the partners had introduced capital in the assessee firm during the year under consideration and no documents except

for the ledger account of the partners had been submitted to justify the source of capital introduced in the firm. The Ld. AO further observed that Shri Rahul Bansal and Shri Rajendra Bansal had withdrawn amount from the partnership firm, M/s Motilal Gopikishan and had thereafter introduced capital in the firm. The Ld. AO reiterated the fact that books of accounts of M/s Motilal Gopikishan had been treated as suspicious during the course of assessment proceedings since several documents related to cash loan and register related to unaccounted investment had been found during the course of search. Accordingly, in the absence of supporting documentary evidences regarding source of capital introduced by its partners, the Ld. AO added the amount of capital introduced by partners of Rs. 2,59,28,791/- to the total income of the assessee. The assessee filed all the supporting documentary evidences before the Ld. CIT(A) during the course of appellate proceedings so as to justify the source of capital introduced by the partners in the assessee firm. The Ld. CIT(A) forwarded all the documents submitted by the assessee during the course of appellate proceedings to the Ld. AO for his comments.

5. The Ld. AO in the remand report challenged the legality of acceptance of additional evidence as per Rule 46A of the Income-Tax Rules, 1962 (hereinafter referred to as 'the Rules') but failed to comment on merits of the documentary evidences furnished by the assessee. The Ld. CIT(A) after considering the assessment order, submission filed by the assessee during the course of appellate proceedings, remand report received from the Ld. AO and submission filed by the assessee in response to the remand report deleted the addition made by the Ld. AO on account of capital introduced by partners.

6. Before us, the Ld. DR vehemently supported the order of Ld. AO. On the other hand, Ld. Counsel for the assessee supported the findings of Ld. CIT(A).

We have heard the respective parties and perused the relevant material available on record.

7. The Ld. Counsel for the assessee submitted that the Ld. AO during the course of assessment proceedings never required the assessee to furnish the details of source of capital introduced by the partners as a result of which the assessee was deprived of an effective opportunity to justify the source of capital introduced by its partners. The Ld. Counsel further submitted it was for the aforesaid reason that the assessee filed ample corroborative documentary evidences during the course of appellate proceedings including confirmation of accounts, bank statements and income-tax returns of the partners so as to justify the identity and creditworthiness of the partners as well as genuineness of the transactions as entered into with them. The assessee also filed copy of capital/ ledger account of the partners in the books of the firm, M/s Motilal Gopikishan so as to justify the source of source of funds introduced by the partners in the assessee firm. Hence, the Ld. Counsel contended that the assessee properly discharged the primary onus cast upon it under section 68 of the Act and accordingly, there was no justification for making addition to the total income of the assessee on account of capital introduced by its partners.

We have further considered inter alia the following submission made by the assessee in the synopsis submitted before us:

“1.1] The Department in the ground of appeal has challenged the action of Ld CIT(A) of deleting the addition of Rs. 2,59,28,791/- as made to the total income of the respondent firm by the assessing officer on account of capital introduced by the partners by treating it as unaccounted and unexplained credit under section 68 of the Income-Tax Act, 1961 even when the said addition of Rs. 2,59,28,791/- as made by the assessing officer on account of capital introduced by the partners was made without allowing set-off of capital withdrawn.

1.2] The assessing officer while passing the assessment order observed that all the partners had introduced capital in the firm during the year under consideration and no documents except for the ledger account of the partners had been submitted to justify the source of capital introduced in the firm. The assessing officer further observed that Shri Rahul Bansal and Shri Rajendra Bansal had withdrawn amount from the partnership firm, M/s Motilal Gopikishan and had thereafter introduced capital in the firm. The assessing officer reiterated the fact that books of accounts of M/s Motilal Gopikishan had been treated as suspicious during the course of assessment proceedings since several documents related to cash loan and register related to unaccounted investment had been found during the course of search. Accordingly, the assessing officer added the amount of capital introduced by partners of Rs. 2,59,28,791/- to the total income of the respondent firm since the respondent firm could not furnish supporting documentary evidences regarding source of capital introduced by its partners.

1.3] At the outset, it is pertinent to mention that the same assessing officer completed the assessment in the case of the partnership firm, M/s Motilal Gopikishan and passed assessment order under section 143(3) r.w.s. 153A of the Income-Tax Act, 1961 for the Assessment Years 2012-13 to 2017-18 and under section 143(3) of the Income-Tax Act, 1961 for the Assessment Year 2018-19 wherein no adverse view was taken in respect of the amount withdrawn by the partners for contributing capital in the respondent firm which in itself justifies that the assessing officer was satisfied with the source of capital contributed in the respondent firm. Further, the observation of the assessing officer that books of accounts of M/s Motilal Gopikishan had been treated as suspicious during the course of assessment proceedings since several documents related to cash loan and register related to unaccounted investment had been found during the course of search has no relevance since the assessing officer herself did not make any addition to the total income of M/s Motilal Gopikishan on this count which in itself contradicts the assertions of the assessing officer.

1.4] It is also pertinent to note that the assessing officer never asked the respondent firm to furnish the details regarding source of capital introduced by the partners either in the notice issued under section 142(1) of the Income-Tax Act, 1961 or in the show cause notice issued during the course of assessment proceedings.

1.5.1] Detail of capital introduced by the partners of the respondent firm during the Financial Year 2017-18 relevant to Assessment Year 2018-19 is as under:

S. No	Name of the partners	Amount of capital introduced [in Rs.]
1	Madhusudan Tiwari	43,95,000
2	Rahul Bansal	38,30,000
3	Rajendra Bansal	43,29,379
4	Satyanarayan Maheshwari	93,00,000
5	Yash Tiwari	40,74,412
	Total	2,59,28,791

1.5.2] Detail with respect to source of capital introduced by the partners in the firm is as under:

S. No	Name of the partners	Amount of capital introduced [in Rs.]	Source of introduction of capital
1	Madhusudan Tiwari	43,95,000	The said amount of capital was introduced out of loan taken from the firm, M/s Motilal Gopikishan and also out of current year income and past savings of the partner
2	Rahul Bansal	38,30,000	The said amount of capital was introduced out of capital withdrawn from the firm, M/s Motilal Gopikishan and also out of loan taken from various other parties
3	Rajendra Bansal	43,29,379	The said amount of capital was introduced out of capital withdrawn from the firm, M/s Motilal Gopikishan and also out of loan taken from

			<i>various other parties</i>
4	<i>Satyanarayan Maheshwari</i>	93,00,000	<i>The said amount of capital was introduced out of amount received from other firms of the partner, out of loan taken from various parties and also out of current year income and past savings of the partner</i>
5	<i>Yash Tiwari</i>	40,74,412	<i>The said amount of capital was introduced out of loan taken from the firm, M/s Motilal Gopikishan and from various other parties and also out of past savings of the partner</i>
	Total	2,59,28,791	

1.5.3] Copy of the following documents are attached herewith so as to justify the source of capital introduced by the partners in the firm which was duly filed by the respondent firm during the course of appellate proceedings:

S. No	Particulars	Page No. of paper book
1	<i>Madhusudan Tiwari [PAN: ABCPT2289B] – Capital of Rs. 43,95,000/- introduced during the year</i>	
1.1	<i>Confirmation of accounts</i>	43
1.2	<i>Relevant pages of bank statement duly highlighting the amount of capital introduced</i>	44
1.3	<i>Acknowledgement of income-tax return along with computation of income for the Assessment Year 2018-19</i>	45-47
1.4	<i>Ledger account in the books of the firm, M/s Motilal Gopikishan so as to justify the source of introduction of capital</i>	48
2	<i>Rahul Bansal [PAN: AIDPB0730B] – Capital of Rs. 38,30,000/- introduced during the year</i>	
2.1	<i>Confirmation of accounts</i>	49
2.2	<i>Relevant pages of bank statement duly highlighting the amount of capital introduced</i>	50-57
2.3	<i>Acknowledgement of income-tax return along with computation of income for the Assessment Year 2018-19</i>	58-60
2.4	<i>Capital account in the books of the firm, M/s Motilal Gopikishan so as to justify the source of introduction of capital</i>	61-63
3	<i>Rajendra Bansal [PAN: ABSPB5125E] – Capital of Rs. 43,29,379/- introduced during the year</i>	
3.1	<i>Confirmation of accounts</i>	64
3.2	<i>Relevant pages of bank statement duly highlighting the amount of capital introduced</i>	65-68
3.3	<i>Acknowledgement of income-tax return along with computation of income for the Assessment Year 2018-19</i>	69-71
3.4	<i>Capital account in the books of the firm, M/s Motilal Gopikishan so as to justify the source of introduction of capital</i>	72-74
4	<i>Satyanarayan Maheshwari [PAN: AEEPM1117Q] – Capital of Rs. 93,00,000/- introduced during the year</i>	
4.1	<i>Confirmation of accounts</i>	75
4.2	<i>Relevant pages of bank statement duly highlighting the amount of capital introduced</i>	76-84
4.3	<i>Acknowledgement of income-tax return along with computation of income for the Assessment Year 2018-19</i>	85-87
5	<i>Yash Tiwari [PAN: AJNPT8023A] – Capital of Rs. 40,74,412/- introduced during the</i>	

	year	
5.1	Confirmation of accounts	88
5.2	Relevant pages of bank statement duly highlighting the amount of capital introduced	89-90
5.3	Acknowledgement of income-tax return along with computation of income for the Assessment Year 2018-19	91-93
5.4	Ledger account in the books of the firm, M/s Motilal Gopikishan so as to justify the source of introduction of capital	94

1.5.4] In view of the above, source of capital introduced by the partners in the firm stands duly justified with the requisite documentary evidences. The respondent firm during the course of appellate proceedings has filed ample documentary evidences including confirmation of accounts, bank statements and income-tax returns of the partners so as to justify the identity and creditworthiness of the partners as well as genuineness of the transactions as entered into with them. The respondent firm has also filed copy of capital/ ledger account of the partners in the books of the firm, M/s Motilal Gopikishan so as to justify the source of source of funds introduced by the partners. Hence, it can be satisfactorily concluded that the respondent firm has properly discharged the primary onus cast upon it under section 68 of the Income-Tax Act, 1961 and therefore, no addition is sustainable to the total income of the respondent firm on account of capital introduced by the partners.

1.5.5.1] The said documents as submitted during the course of appellate proceedings were also forwarded to the assessing officer for his comments. However, the assessing officer in his remand report dated 03-08-2021 failed to comment on merits of the documentary evidences as filed by the respondent firm. Rather, the Assessing Officer in the entire remand report re-iterated the fact that additional evidences filed during the course of appellate proceedings were beyond the purview of Rule 46A of the Income-Tax Rules, 1962 and therefore, those additional evidences were required to be rejected. Copy of remand report dated 03-08-2021 is already been filed in page nos. 133-134 of paper book filed before the Hon'ble Bench

1.5.5.2] The respondent firm in response to remand report as submitted by the assessing officer duly filed its submission 10-08-2021 before the Ld CIT(A) in which the respondent firm duly explained the applicability of Rule 46A of the Income-tax Rules, 1962 in the present case in hand. Copy of submission dated 10-08-2021 is already been filed in page nos. 135-138 of paper book filed before the Hon'ble Bench. The Ld CIT(A) during the course of appellate proceedings after considering submissions and documentary evidences as filed by the respondent firm accepted the additional evidence as filed during the course of appellate proceedings and on the basis of the said evidences, deleted the addition of Rs. 2,59,28,791/- as made to the total income of the respondent firm on account of capital introduced by the partners.

1.6] Further, it is pertinent to mention that even if the assessing officer was of the opinion that the firm, M/s Motilal Gopikishan was having unaccounted cash, necessary action could have been taken in the case of the firm, M/s Motilal Gopikishan but no adverse inference can be drawn in the case of the respondent firm with respect to the source of capital introduced by the partners which stands duly justified with the requisite documentary evidences. Hence, the observations of the assessing officer while disbelieving the source of capital introduced by the partners are devoid of any merits and have no legs to stand."

8. The Ld. Counsel further submitted that the same Assessing Officer completed the assessment in the case of the partnership firm, M/s Motilal Gopikishan from where the partners of the assessee firm withdrew cash/ obtained loan and thereafter introduced capital in the assessee firm and that no adverse view was taken in the case of M/s Motilal Gopikishan in respect of the amount

withdrawn by the partners for contributing capital in the assessee firm which in itself justifies that the Ld. AO was satisfied with the source of capital introduced in the assessee firm. Further, the Ld. Counsel also submitted that assessment in the case of two of the partners i.e. Shri Rahul Bansal and Shri Rajendra Kumar Bansal was also completed by the Assessing Officer wherein the Assessing Officer did not take any adverse view in respect of the amount of capital introduced in the assessee firm which in itself justifies that the Ld. AO was satisfied with the source of capital introduced in the assessee firm. Accordingly, the Ld. Counsel vehemently argued that there was no justification for making addition to the total income of the assessee on account of capital introduced by partners.

9. The Ld. Counsel contended that it is well settled that once the assessee furnishes the details with regard to the source of capital introduced in the firm and the concerned partner confirms such contribution, the assessee is considered to have duly discharged the onus cast upon it and that the law is no more res integra that once the firm offers an explanation and establishes that the capital is contributed by the partners, the same cannot be assessable in the hands of the firm. He relied upon the following judicial precedents in support of his contentions:

- (i) Pr. CIT v. Vaishnodevi Refoils & Solvex [2018] 96 taxmann.com 469 (SC) & Pr. CIT-4 v. Vaishnodevi Refoils & Solvex [2018] 89 taxmann.com 80 (Gujarat)
- (ii) CIT v. Metachem Industries [2000] 245 ITR 160 (Madhya Pradesh)
- (iii) CIT v. Jaiswal Motor Finance [1983] 141 ITR 706 (Allahabad)
- (iv) Narayandas Kedarnath v. CIT [1952] 22 ITR 18 (Bombay)

- (v) CIT Versus Pankaj Dyestuff Industries [Income Tax Reference No. 241 of 1993]
- (vi) CIT v. Taj Borewells [2007] 291 ITR 232 (Madras)
- (vii) Deluxe Enterprises v. ITO, Ward-1, Solan [2017] 184 TTJ 394 (Chandigarh - Trib.)
- (viii) Addl. CIT v. Unique Builders [2004] 2 SOT 589 (KOL.)(SMC)

10. It was further submitted that it is a well settled proposition of law that the Assessing Officer cannot ask the assessee firm to prove source of source i.e. source of capital introduced by the partners and if the assessee firm explains that the capital is contributed by the partners and the partners confirm the same, the onus of the assessee-firm stands discharged and the amount of capital introduced by the partners cannot be taxed as income of the assessee-firm and that if the partners are unable to satisfactorily explain the source of introduction of such capital in the firm, the impugned amount could have been added in the hands of the partners but not in the hands of the assessee-firm. He relied upon the following judicial precedents in support of his contentions:

- (i) CIT-I, Patna v. Anurag Rice Mills [2016] 282 CTR 200 (Patna)
- (ii) Laxmi Imaging & Medical Research v. ACIT, Circle-1, Jodhpur [2012] 150 TTJ 44 (Jodhpur - Trib.)(UO)
- (iii) Sarjan Corporation v. ACIT [2012] 25 taxmann.com 426 (Ahmedabad - Trib.)
- (iv) M/s Jaylaxmi Land Developers Vs. ITO, Ward 1, Anand [ITA No. 2226/AHD/2016]

11. Accordingly, the Ld. Counsel contended that there was no justification for making any addition to the total income of the assessee on account of capital introduced by its partners.

12. We find that the Ld. CIT(A) while allowing the appeal preferred by the assessee observed as follows:

“4.4. Ground Nos 1 to 4 for A.Y. 2018-19: - *Through these grounds of appeal the appellant has challenged the addition made by the AO amounting to Rs: 2,59,28,791/- on account of capital introduced by the partners by treating the same as unaccounted and unexplained credit u/s 68 of the I.T. Act, 1961 and charging of tax liability by invoking the amended provision of section 115BBE of the Act. The appellant firm received capital from its partners to the tune of Rs 2,59,28,791/-, since no explanation was provided by the appellant firm. Hence, the said amount was added to the total income of the appellant firm. The assessing officer in the assessment order observed that the amount as introduced by Shri Rahul Bansal and Shri Rajendra Bansal was withdrawn from the firm M/s Motilal Gopikishan but transactions with the firm M/s Motilal Gopikishan was doubted by the assessing officer and entire amount of capital introduced by all the partners were added to the total income of the firm. During the course of appellate proceedings, it was stated by the appellant that no show cause notice was issued by the assessing officer prior to making addition in respect of capital as introduced by the partners. The details in respect of capital as introduced by the partner was provided by the appellant firm itself. Shri Rahul Bansal and Shri Rajendra Bansal was assessed by the same assessing officer and no addition was made in respect of capital introduced by them in the appellant firm. The appellant firm during the course of appellate proceeding provided complete details in respect of capital as introduced by the partners which was forwarded to the assessing officer for his comments. The assessing officer in his remand report challenged the legality of the acceptance of additional evidence as per Rule 46A of the Income Tax Rules but no reply on merit was filed. The assessing officer at the end of the remand report stated that additional evidence may be accepted in the appellate proceeding. In the interest of substantial justice, additional evidence as filed by the appellant was permitted and considered while adjudicating the ground of appeal.*

4.4.1. *The appellant firm filed confirmation of partner's capital duly signed, copy of bank account of the partner, Acknowledgement of income tax return as filed and ledger account in the book of the firm from where the partners received amount prior to introducing in form of capital in the appellant firm. On perusal of the documents as filed, I am of the considered view that the appellant firm has properly discharged onus lying on it. The identity of the partners were not doubted by the assessing officer. The creditworthiness and genuineness of the transactions have been proved by the appellant. Major amount of capital as introduced by the partners were withdrawal from the firm M/s Motilal Gopikishan which was also assessed by the same assessing authority. If the assessing officer was not satisfied with the source of amount paid by the firm M/s Motilal Gopikishan in that case, necessary addition can be made in the assessment of that firm but no adverse view was taken in that firm. Similarly, assessment of two partners were also made by the same assessing officer and if the assessing officer doubted about the creditworthiness and genuineness of the capital as introduced by these two partners viz Shri Rahul Bansal and Shri Rajendra Bansal, in that case necessary addition was to be made in their assessment but no such addition was made in their individual assessment order.*

Considering the overall facts of the case, submissions and supporting documents as filed by the appellant firm, it is held that the AO has not justified in making addition. Therefore, the

addition made by the AO amounting to Rs: 2,59,28,791/- on account of capital introduced by the partners is Deleted. Thus, the appeal on these grounds is Allowed. Since the addition as made by the assessing officer on account of unexplained cash credit u/s 68 of the I.T. Act, 1961 have already been deleted on merit. Therefore, the charging of tax liability as per amended provisions of section 115BBE on these grounds is academic in nature and having no impact on the fate of these grounds.”

13. The above findings of the Ld. CIT(A) have not been controverted by the Ld. DR. The facts discussed above squarely reveal that the Ld. AO made addition on account of capital introduced by the partners simply for the reason that the assessee did not furnish any documentary evidence during the course of assessment proceedings to justify the source of capital introduced by the partners. The Ld. CIT(A) rightly admitted the additional evidences furnished by the assessee during the course of appellate proceedings. Further, on perusal of the remand report annexed on Page No. 133-134 of the Paper Book, we find that the Ld. AO in the remand report merely challenged the acceptance of additional evidence as per Rule 46A but he utterly failed to comment on merits of the documentary evidences furnished by the assessee during the course of appellate proceedings to justify the identity and creditworthiness of the partners as well as genuineness of the transactions as entered into with them. Hence, we observe that there are no adverse remarks of the Ld. AO regarding source of capital introduced by the partners in the assessee firm except for the fact that no documentary evidences were furnished by the assessee during the course of assessment proceedings to justify the source of capital introduced by the partners.

14. On merits, we find that the assessee filed ample corroborative documentary evidences such as confirmation of accounts, bank statements and income-tax returns of the partners along with the copy of capital/ ledger account of the partners in the books of the firm, M/s Motilal Gopikishan and thus, the

assessee satisfactorily discharged the primary onus cast upon it under section 68 of the Act. Accordingly, we of the considered opinion that there was no justification for making addition to the total income of the assessee on account of capital introduced by its partners since the assessee duly justified the identity and creditworthiness of the partners as well as genuineness of the transactions as entered into with them.

15. We also find force in the contentions of the Ld. Counsel that assessment in the case of two of the partners i.e. Shri Rahul Bansal and Shri Rajendra Kumar Bansal was also completed by the same Assessing Officer wherein the Assessing Officer did not take any adverse view in respect of the amount of capital introduced in the assessee firm which in itself justified that the Assessing Officer was satisfied with the source of capital introduced in the assessee firm. Further, assessment in the case of the partnership firm, M/s Motilal Gopikishan from where the partners of the assessee firm withdrew cash/ obtained loan and thereafter introduced capital in the assessee firm was also completed by the same Assessing Officer and that no adverse view was taken in the case of M/s Motilal Gopikishan in respect of the amount withdrawn by the partners for contributing capital in the assessee firm which further justified that the Ld. AO was satisfied with the source of capital introduced in the assessee firm. Hence, we found no reason to sustain addition to the total income of the assessee on account of capital introduced by partners since source of capital introduced by the partners stood duly explained.

16. The addition made by the Ld. AO on account of capital introduced by partners cannot be said to be justified in view of the observations made

hereinabove. Hence, we do not find any infirmity in the findings of the Ld. CIT(A) and accordingly, the deletion of addition of Rs. 2,59,28,791/- made by the Ld. CIT(A) is found to be just and proper so as to warrant no interference. Hence, this ground of appeal preferred by Revenue is found to be devoid of any merit and, thus, dismissed.

17. In the result, appeal filed by the Revenue is dismissed.

This Order pronounced on 15/03/2023

Sd/-
(BHAGIRATH MAL BIYANI)
ACCOUNTANT MEMBER

Indore; Dated 15/03/2023

S. K. Sinha, Sr. PS

True Copy

Sd/-
(MADHUMITA ROY)
JUDICIAL MEMBER

आदेश की प्रतिलिपि अग्रेषित/Copy of the Order forwarded to :

1. अपीलार्थी / The Appellant
2. प्रत्यर्थी / The Respondent.
3. संबंधित आयकर आयुक्त / Concerned CIT
4. आयकर आयुक्त(अपील) / The CIT(A)-
5. विभागीय प्रतिनिधि, आयकर अपीलीय अधिकरण, अहमदाबाद / DR, ITAT, Indore
6. गार्ड फाईल / Guard file.

आदेशानुसार/ BY ORDER,

(Sr.PS)
ITAT, Indore