

आयकर अपीलिय अधिकरण, जयपुर न्यायपीठ, जयपुर
IN THE INCOME TAX APPELLATE TRIBUNAL, JAIPUR BENCHES,"B" JAIPUR

डा० एस. सीतालक्ष्मी, न्यायिक सदस्य एवं श्री राठोड कमलेश जयन्तभाई, लेखा सदस्य के समक्ष
BEFORE: DR. S. SEETHALAKSHMI, JM & SHRI RATHOD KAMLESH JAYANTBHAI, AM

आयकर अपील सं./ITA. No. 196/JPR/2023
निर्धारण वर्ष / Assessment Years : 2018-19

Columbus Overseas LLP 16 Raja Park, Adarsh Nagar, Jaipur.	बनाम Vs.	The Principal Commissioner of Income Tax-1, New Central Revenue Building, Bhagwan Das Road, Jaipur Jaipur.
स्थायी लेखा सं./जीआईआर सं./PAN/GIR No.: AAJFC 9914 C		
अपीलार्थी / Appellant		प्रत्यर्थी / Respondent

निर्धारिती की ओर से / Assessee by : Shri S.L. Poddar (Adv.)
राजस्व की ओर से / Revenue by : Shri Ajey Malik (CIT)

सुनवाई की तारीख / Date of Hearing : 21/06/2023
उदघोषणा की तारीख / Date of Pronouncement : 28/07/2023

आदेश / ORDER

PER: RATHOD KAMLESH JAYANTBHAI, AM

This appeal is filed by assessee aggrieved from the order of the Learned Principal Commissioner of Income Tax, Jaipur-1 [here in after "Ld. PCIT"] for assessment year 2018-19 dated 27.03.2023 as per provisions of section 263 of the Income Tax Act (hereinafter "Act"). The order of the Ld. PCIT arise from the order passed by the National e-Assessment Centre, Delhi passed u/s 143(3) read with sections 143(3A) & 143(3B) of the Act dated 12.02.2021.

2. The assessee has marched this appeal on the following grounds:-

“1. In the facts and circumstances of the case and in law, Ld. PCIT has erred in exercising the revisionary powers by passing order u/s 263 of I.T. Act, 1961 dated 27.03.2023 setting aside the order passed u/s 143(3) dated 12.02.2021. The action of the Id. PCIT is illegal, unjustified, arbitrary and against the facts of the case. Relief may please be granted by quashing the order passed u/s 263.

2. In the facts and circumstances of the case and in law, Ld. PCIT has erred in exercising the revisionary powers by passing order u/s 263 of I.T. Act, 1961 dated 27.03.2023 setting aside the order passed u/s 143(3) dated 12.02.2021 without considering and ignoring the facts mentioned in our submission letter dated 16.02.2023.

3. In the facts and circumstances of the case and in law, Ld. PCIT has erred in holding that the assessment order passed u/s 143(3) dated 12.02.2021 is erroneous and prejudicial to interest of revenue. However, the details were duly verified by the Ld. AO during the assessment proceedings and the assessment order u/s 143(3) was passed with due application of mind.

4. The assessee craves your indulgence to add amend or alter all or any grounds of appeal before or at the time of hearing.”

3. The fact as culled out from the records is that that assessee is a limited liability partnership and is engaged in the business of Real Estate. The return of income was filed electronically by the assessee for the assessment year 2018-19 on 18.10.2018 declaring total income of Rs. 7,11,130/-. Subsequently, the case was selected for complete scrutiny through CASS and accordingly notice u/s 143(2) of the Act dated 22.09.2019 was issued

electronically and served upon the assessee within time and manner prescribed under the I.T. Act. Further, notice u/s 142(1) of the Act dated 27.11.2020 along with questionnaire was also issued online and served upon the assessee. The case was selected from complete scrutiny assessment under the E-assessment Scheme, 2019 on the following issues:-

1. Income from Real Estate Business.
2. Contract Receipt or fees
3. Unsecured loans

On perusal of the submissions made by the assessee, Id. AO passed an order assessing the income of the assessee at Rs. 7,11,130/-.

4. On culmination of the assessment proceedings, the learned PCIT perused the assessment records and found that the assessee made payment of Rs. 48,281/- on account of interest on income tax which is in the nature of FINE/PENALTIES AND INTEREST which is not allowable expenditure being penal in nature. The PCIT also observed that one of the reasons for selection of the case was contract receipts or fees. The assessee claimed TDS of Rs. 17,97,506/- on receipts of Rs. 15,99,83,859/-.

The parties have deducted @ 1% or 2% TDS on receipts which is contract/fees receipts but in case of HG Foods and Drinks LLP amounting to Rs.3,50,000/-, Kotak Mahindra Bank amounting to Rs. 1,78,658/-, Lokendra Singh amounting to Rs. 8,88,944/- & Pigment Communication amounting to Rs. 1,36,000/- TDS was deducted @ 10% which is covered in income from interest. Thus, the income from interest amounting to Rs. 15,53,602/- (i.e 350000 + 178658 + 888944 + 136000) was not shown by the assessee. This has resulted under assessment of Rs. 15,53,602/- as income from interest. The Id. PCIT further noted that the assessee has disclosed receipts from contract wrongly at Rs. 10,95,79,942/- instead of Rs.15,84,30,257/- (15,99,83,859 – 15,53,602) and declared net profit thereon @ 0.65% at Rs. 7,11,130/- instead of Rs. 10,28,657/-. This resulted into under assessment of receipts at Rs.4,88,50,318/- and under assessment of income at Rs.3,17,527/-. In view of the above mentioned facts, Id. PCIT observed that the assessment order dated 12.02.2021 passed u/s 143(3) r.w.s 143(3A) & 143(3B) of the Act in the case of the assessee for A.Y 2018-19 was erroneous in so far as it was prejudicial to the interest of the revenue. Accordingly, the assessee was given an opportunity to show cause as to why the order

passed u/s 143(3) r.w.s 143(3A) & 143(3B) on 12.02.2021 for A.Y 2018-19 should not be revised u/s 263 of the Act in a suitable manner. The assessee has not filed any reply to the same. Since, the assessee did not respond to the show cause noticed dated 17.03.2023 the Id. PCIT based on the material available on record held the order of the AO dated 12.02.2021 is erroneous and prejudicial to the interest of the revenue. The relevant finding of the PCIT is reproduced here in below :

“8. I have perused the order of the Assessing Officer as well as the documents placed on record. On verification of the assessment records, it is noticed that the assessee has claimed Rs. 48,281/- as interest on delayed payment on TDS. However, this is not an allowable expenditure being penal in nature. Therefore, Rs. 48,281/- is required to be disallowed and added back to the assessed income of the assessee. This has not been done by the AO during the course of assessment proceedings.

9. On going through Profit & Loss account, it is seen that the assessee has shown 'Other Income' in schedule 18 of P&L account at Rs. 43,40,360/- but bifurcation of such income is not there. Also on perusal of the ledgers filed during the course of proceedings, the figures of receipts is not tallying. Therefore, receipts of Rs. 15,53,602/- remains unverified. This should have been verified by the AO during the course of assessment proceedings.

10. It is further mentioned by the assessee during the course of assessment proceedings that it is following Percentage Completion Method (PCM) to record income in books of account and based on PCM method, it has shown revenue from operation amounting to Rs. 10,95,79,942/- during the year. The assessee has submitted working of total sales of Rs. 63.93,54,592/- accounted during the different years. But it is observed that even if the assessee is using PCM and has booked revenue at Rs. 10,95,79,942/- but the fact of the matter is that total receipts of the assessee for the year under consideration is Rs

15,84,30,257/- on which TDS of Rs. 17,97,506/- has been claimed by the assessee. It is not established that the assessee has shown difference amount of Rs. 4,88,50,315/- in its books of account.

11. As discussed above, the Assessing Officer failed to apply his mind on the material available on record and failed to invoke the applicable provisions of law. This in turn has resulted in passing of an erroneous order by the Assessing Officer in the case due to non-application of mind to relevant material, an incorrect assumption of facts and an incorrect application of mind to the law which is prejudicial to the interest of the revenue and hence liable for revision under section 263 of the Income Tax Act, 1961. The Hon'ble Supreme Court in the case of Malabar Industrial Limited V/S CIT 243 ITR it has held as under-

".....An incorrect assumption of facts or an incorrect application of law will satisfy the requirement of the order being erroneous. In the same category fall orders passed without applying the principles of natural justice or without application of mind."

12. Considering all the facts and circumstances of the case and for the reasons discussed above, the assessment order dated 12.02.2021 for A. Y. 2018-19 passed by the AO is held erroneous in so far as it is prejudicial to the interests of the revenue for the purpose of section 263 of the Income Tax Act, 1961. The said order has been passed by the Assessing Officer in a routine and casual manner without verification of the issues discussed above. The Assessing Officer was required to make the disallowances / add back the amounts discussed in the paras above which he failed to do. The order of the Assessing Officer is, therefore, liable to revision under the explanation (2) clause (b) and clause (a) of section 263 of the Income Tax Act, 1961. The assessment order is set aside to be made afresh in the light of the observations made in this order. The AO is required to make necessary verification and finalize the assessment in accordance with the prevailing law to determine the correct income of the assessee liable to tax for the A.Y.2018-19 after allowing reasonable opportunity to the assessee."

5. Feeling dissatisfied from the order of the Id. PCIT, the Id. AR of the assessee has filed the present appeal as per grounds so raised and reiterated in para 2 above.

5.1 At the outset of the hearing the Id. AR of the assessee withdraw the ground no 2 raised by the assessee and he has given his consent to withdraw the same in the court file. Therefore, the ground no. 2 raised by the assessee is dismissed.

5.2 A propose to the remaining ground the Id. AR of the assessee in support of the grounds so raised, filed a detailed submission which is reproduced here in below:-

“BRIEF FACTS OF THE CASE AND SUBMISSION:→

The assessee is engaged in real-estate business. For the year under consideration, the assessee filed return of income declaring total income of Rs.7,11,130/- on 18/10/2018. Copy of acknowledgement of return of income along with computation of income is available on Paper Book Page No1-3. The case was selected for complete scrutiny and notice u/s 143(2) was issued on 22/09/2019. As per the assessment order, the main issues for examination were - (1) Income from real estate business, (ii) contract receipts or fees and (iii) unsecured loans. During the course of assessment proceedings, notice u/s query letter was issued on 27/11/2020, requiring the assessee to furnish certain details/information. In compliance to the notice issued u/s 142(1), the assessee furnished the information/details requisitioned by the Learned Assessing Officer. The same were found in order after examination by the Learned Assessing Officer. Accordingly, the assessment was completed on returned income of Rs. 7,11,130/-, vide order u/s 143(3) read with Sec. 143(3A) and 143(3B) of the IT Act, 1961, vide order dated 12/2/2021. Copy of the assessment order is available on Paper Book Page No. 4-5.

Subsequently, the Pr. Commissioner of Income-tax-1, Jaipur initiated revisionary proceedings u/s 263, proposing revision of the assessment order passed by the Learned Assessing Officer on 12/2/2011 on the following grounds :-

(i) That payment of Rs.48,281/- on account of interest on delayed payment of TDS, which is in the nature of penalty/fine, is required to be added back.

(ii) That income from interest amounting to Rs.15,53,602/-, has been under-stated;

(iii) That the contract receipts have been shown at Rs. 10,95,79,942/- instead of Rs. 15,84,30,257/- and thus, receipts have been shown less by Rs. 4,88,50,318/-, resulting in under-statement of income of Rs. 3,17,527/-.

It is submitted that the Learned Pr.CIT has rushed through in passing the order u/s 263 on the basis of objections raised by Internal audit party and without considering the facts of the case, the position of law and the reply of the assessee. The order passed u/s 263 is objected to and is assailed as under, discussing the grounds of appeal.

Grounds No.1

In the facts and circumstances of the case and in law, Learned. PCIT has erred in exercising the revisionary powers by passing order u/s 263 of IT Act, 1961 dated 27/03/2023 setting aside the order passed u/s 143(3) dated 12/02/2021. The action of the Learned PCIT is illegal, unjustified, arbitrary and against the facts of the case. Relief may please be granted by quashing the order passed u/s 263.

Ground No.2

In the facts and circumstances of the case and in law, Learned PCIT has erred in exercising the revisionary powers by passing order u/s 263 of IT Act, 1961 dated 27/03/2023 setting aside the order passed u/s 143(3) dated 12/02/2021 without considering and ignoring the facts mentioned in our submission dated 16/2/2023.

Ground No.3

In the facts and circumstances of the case and in law, pd PCIT has erred in holding that the assessment order passed u/s 143(3) dated 12/2/2023 is erroneous and prejudicial to the interest of revenue. However, the details were duly verified by the Learned Assessing Officer during the assessment proceedings and the assessee order u/s 143(3) was passed with due application of mind.

Grounds No. 1, 2 & 3 are taken together as under :-

The Learned PCIT has wrongly held the order passed by the Learned Assessing Officer as erroneous and prejudicial to revenue without appreciating the facts that the Learned Assessing Officer before passing the assessment order had issued questionnaire along with notice u/s 142(1) and also notice u/s 143(2). It is also mentioned in the assessment order that the assessee had filed details and explanations and supporting documents and the same were examined by the learned Assessing Officer. This is as per page No. 2 of the assessment order. It is after careful examination of the details and replies furnished by the assessee that the Learned Assessing Officer passed the assessment order on 12/02/2021.

The Pr CIT has held wrongly held the order of the Learned Assessing Officer as erroneous and prejudicial to the interest of revenue on the following three grounds :-

(i) That payment of Rs.48,281/- on account of interest on delayed payment of TDS, which is In the nature of penalty/fine, is required to be added back.

(ii) That income from interest amounting to Rs.15,53,602/-, has been under-stated;

(iii) That the contract receipts have been shown at Rs. 10,95,79,942/- instead of Rs. 15,84,30,257/- and thus, receipts have been shown less by Rs. 4,88,50,318/-, resulting in

under-statement of income of Rs. 3,17,527/-. Each of these grounds is discussed below :-

(a) Payment of interest of Rs.48,281/- on delayed payment of TDS.

The Learned PCIT has directed the Learned Assessing Officer to disallow the payment of interest of Rs. 48,281/- claimed by the assessee on delayed payment of TDS. In the view of the Learned PCIT, the payment is of penal nature and hence the same is disallowable.

It is submitted that the finding of the Learned PCIT is not in accordance with law. The claim of the assessee is legal, lawful and justified. In the following decisions of Courts and ITAT Benches, it has been held that the payment of interest on delayed payment of TDS is not of penalty nature. Therefore, the claim of the assessee is in order. The Learned

PCIT was not justified in setting aside the assessment order on this ground.

Relevant decisions

- i. Mahalakshmi Sugar Mills Co. Vs. CIT123 ITR 429 (SC)
- ii. CIT Vs. Oriental Insurance Co. Ltd (2009) 183 Taxmann (Karnataka) 186
- iii. Taksheel Solutions Limited Vs. ACIT - ITA No.1768/Hyd/2012
- iv. M/s Trinity Infra Venture Ltd Vs. ACIT ITA N90.403/Hyd/2021
- v. Ferro Alloys Corporation Ltd Vs. CIT (1992)196 ITR 406 (Bombay)
- vi. Resolve Salvage & Fine Ind P. Ltd Vs. DCIT ITA No. 841/Mum/2019 order dt. 18/4/2022

In the above cases, it has been held that payment of interest on TDS is of compensatory nature and is not of penal nature, therefore, the same is allowable. In these circumstances, the claim of the assessee was in order and there was no case on this issue with the Pr. CIT for setting aside the assessment order u/s 263. Copies of decisions in respect of M/s Trinity Infra Venture Ltd Vs. ACIT ITA N90.403/Hyd/2021 and Resolve Salvage & Fire Ind P. Ltd Vs. DCIT ITA No. 841/Mum/2019 order dt. 18/4/2022 are available on Paper Book Page No. 6-18.

(b) Alleged under-statement of interest income amounting to Rs.15,53,602/-

It is submitted that the order u/s 263 by the Pr CIT has been passed under assumptions, presumptions and conjectures. The working of alleged under- statement of interest income is totally imaginary and is not based on facts. The Learned PCIT has worked out the interest income out of the receipts of Rs.15,98,83,859/- on which TDS of Rs. 17,97,506/- was made. The Learned PCIT has sorted out such receipts on which TDS was made @ 10% and treated the same on assumption as interest income.

S. No.	Amount (Rs.)	Explanation
1.	3,50,000	This is rental income from HG Foods and Drinks LLP and is included in the total rental income of Rs.9,09,775/-. Copy of this account is available on

		Paper Book Page No. 19. Further, this amount of Rs.9,09,775/- is part of other income totaling to Rs.43,40,360/-. Copy of this account is available on Paper Book Page No.20.
2.	1,78,000	This is income from interest from Kotak Bank. Copy of interest account is available on Paper Book Page No.21 The account reflects receipt of interest of Rs. 1,36,257/-. The balance amount of Rs.41,743/- has been disclosed in the next assessment year 2019-20.
3.	8,88,944	These are club receipts. Rs.8,06,681/- have been shown and included under the head other income Rs.43,40,360/-. Copy of this account is available on Paper Book Page No.22. Copy of statement of other income is available on paper book Page No.20. Balance Rs.82,263/- (888944 – 806681) has been shown in the next ASSESSMENT YEAR 2019-20.
4.	1,36,000	These are rental receipts from Pigment Communications P. Ltd. Copy of the account is available on Paper Book Page No. 23. It is submitted that rent of Rs.34,000 per month is received. During ASSESSMENT YEAR 2018-29, Rs.1,02,000/- has been disclosed under the head rent received, totaling to Rs.9,09775/-, which is part of "other income" shown at Rs.43,40,360/-. Balance Rs. 34,000/- (Rs.136000 102000) has been reflected in ASSESSMENT YEAR 2019-20.

In view of the above, there was no case with the Learned PCIT to set-aside the assessment order on the above ground. The Learned PCIT had acted on presumption in calculating the interest amount of Rs. 15,53,602/-, which in fact included rental income and receipts from club. The interest income was only of Rs. 1,36,257/- instead of Rs.15,53,602/- as mentioned in the order passed u/s 263 by the Pr CIT. Thus, the facts mentioned in the order u/s 263 are wrong and the Learned PCIT was not justified in setting aside the assessment order on the basis of wrong facts.

(c) Alleged under-statement of receipts by Rs.4,88,50,318/- and under-statement of income by Rs. 3,17,527/-

It is submitted that on this issue also, the Learned PCIT was not justified in setting aside the assessment order u/s 263. The action of the Learned PCIT is based on assumptions It is the case of the Learned PCIT that the assessee has claimed TDS of Rs.17,97,506/- on total receipts of Rs.15,99,83,859/-. After reducing Rs.15,53,602/-, which as per Pr. CIT,

were receipts of interest and have been discussed in the foregoing paras, the balance amount remains at Rs.15,84,30,257/-, which have been treated as contract receipts, whereas such receipts as per 26AS are only of Rs.15,52,46,053/-. Therefore, the Learned PCIT erred in adopting the figures without considering the official form No. 26AS.

It is submitted that these receipts are on account of sale of immovable properties of "Shivgyan Luxora". The assessee has been disclosing income on the basis of Percentage Completion Method (PCM). The total receipts of this project are Rs.63,93,54,591/-. During the year under consideration, the assessee has disclosed Rs. 10,84,53,067/- and the balance Rs.53,09,01,524/- has been disclosed in earlier years. Copy of statements having details of Rs.63,93,54,591/- is available on Paper Book Page No.24-25. Copy of statement of Rs.53,09,01,524/- disclosing receipts in earlier years is also available on Paper Book Page No. 26. In support of this, Copy of IT return along with copy of P&L a/c disclosing the receipts are available on Paper Book Page No.27- 36. from ASSESSMENT YEAR 2014-15 to ASSESSMENT YEAR 2017-18. It is the submission of the assessee that as the assessee is disclosing receipts on Percentage Completion Method, therefore, the receipts cannot be matched with the receipts in form No.26AS. It is submitted that in the form No. 26AS, the total receipts disclosed from ASSESSMENT YEAR 2014-15 to 2018-19 are only of Rs.42,58,66,665/- whereas such receipts disclosed by the assessee far exceed and are of Rs.63,93,54,592/-. In view of this, the discrepancy pointed out by the Pr CIT is a fallacy and is not based on facts. The assessee has truthfully recorded the receipts of Rs. 63,93,54,592/- and there is no case of under-statement of receipts. The details of receipts of Rs.42,48,66,665/- as per form No.26AS are available on Paper Book Page No.37-54. The submission of the assessee being perfectly in order deserves acceptance. There was no case with the Learned PCIT for setting aside the assessment order u/s 263 on this issue also.

Conclusion

In view of the aforesaid submission, the Pr CIT was not justified in setting aside the assessment order and in passing order u/s 263 just on the basis of assumptions, presumptions and conjectures. The order passed u/s 263 deserves to be quashed.

GroundNo.4

The assessee craves your indulgence to add, amend or alter all or any grounds of appeal before or at the time of hearing.

Your Honor is requested to decide the appeal in favour of the assessee by considering the grounds and submission made above and oblige."

6. The Id AR of the assessee in addition to the written submission so filed also vehemently argued before us that the assessment in this case has been completed by the faceless assessment unit. In the faceless unit there are various other sub units and the assessment order is passed after considering the submission of the assessee. The issue for examination also cover the issue of contract receipt for the details were called for and plausible view was taken by the NeFAC. Not only that in the faceless regime the order tested on various aspect on team-based assessment proceedings and then assessment unit has considered and framed the assessment. The board has prescribed various stage by which the order passes through various stages of the assessment unit and considering the faceless assessment scheme being framed the order passed u/s 263 of the Act is nothing but a review of the reasoned order of the assessing officer. Observing only the defect which are not the defect in actual order is beyond the provisions of section 263 of the Act and therefore summoning the assessee again by invoking the provisions of section 263 of the Act on same issue which has been examined at length is not the purpose of provision of section 263 of the Act as regards the disallowance of interest on TDS the issue is debatable

and the Id. AO has after considering the record not deem it fit to disallow and PCIT cannot direct to disallow particular claim u/s. 263 of the Act. As regards the alleged under statement of receipt for an amount of Rs. 4,88,50,318/- the Id. AR of the assessee submitted that these receipts are on account of sale of property Shivgyan luxora. The assessee has been disclosing income on the basis of percentage completion method.

7. On the other hand, Id. DR representing the Revenue has supported the order of the Id. PCIT and submitted that the issue raised by the PCIT is based on the submission filed before the Id. AO wherein the discrepancies are apparent and the assessee did not respond to the notices issued by the PCIT and therefore, the order of the PCIT is reasoned order and there is no submission to the contentions so raised by the assessee before the PCIT. Therefore, the provision of section 263 of the act has rightly been invoked by the Id. PCIT as Id. AO has not applied his mind on the various aspect as pointed out by the PCIT. The Id. AR of the assessee in this appeal so withdrawn ground no 2 that the reply has been submitted this support that the order of the PCIT deserve to be sustained.

8. We have careful consideration the factual matrix as well as argument advanced by both the parties. It is not disputed that the before the PCIT the assessee did not file any submission so as to deal the observations of the PCIT. The bench also note that the case of the assessee was specifically selected for specific issue which includes the income from real estate business and contract receipt of fees. On both the aspect of the case the Id. PCIT has observed that there is nothing on record placed by the Id. AR of the assessee that the details were placed on record and the Id. AO has examined the issue of the assessee offering the income on percentage completion method and the assessee also failed to demonstrate as to the submission for reconciling the income reflected in the TDS claim vis a vis to the income offered. Even the assessee has chosen not to reply the notice of the PCIT.

Thus, we are of the considered view that the assessee is failed to established on the both the issue for which the case was selected for scrutiny. Therefore, in the light of these facts and circumstances, we see no infirmity in the order of Id. PCIT holding that the order of the Assessing Officer is prejudicial to the interest of revenue and the same is erroneous on account of the fact that neither the assessee has filed before the Id. AO on the issue of

how the income of the real estate business is computed and how the contract fees is accounted. Not only that the assessee remained silent even before the Id. PCIT and has not explained the veracity of the contentions so raised. Therefore, we are of the considered view that the order passed by the Assessing Officer is erroneous and rightly held by Id. PCIT as prejudicial and erroneous in the interest of the revenue and therefore, the appeal filed by assessee is dismissed.

In the result, appeal of the assessee is dismissed.

Order pronounced in the open Court on 28/07/2023

Sd/-

(डा० एस. सीतालक्ष्मी)
(Dr. S. Seethalakshmi)
न्यायिक सदस्य / Judicial Member

Sd/-

(राठोड कमलेश जयन्तभाई)
(Rathod Kamlesh Jayantbhai)
लेखा सदस्य / Accountant Member

जयपुर / Jaipur

दिनांक / Dated:- 28/07/2023

*Ganesh Kumar, PS

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

1. अपीलार्थी / The Appellant- Columbus Overseas LLP, Jaipur.
2. प्रत्यर्थी / The Respondent- PCIT-1, Jaipur.
3. आयकर आयुक्त / CIT
4. आयकर आयुक्त / CIT(A)
5. विभागीय प्रतिनिधि, आयकर अपीलीय अधिकरण, जयपुर / DR, ITAT, Jaipur.
6. गार्ड फाईल / Guard File { ITA No. 196/JPR/2023 }

आदेशानुसार / By order

सहायक पंजीकार / Asst. Registrar