

आयकर अपीलीय अधिकरण, 'सी' न्यायपीठ, चेन्नई  
**IN THE INCOME TAX APPELLATE TRIBUNAL  
'C' BENCH, CHENNAI**

श्री वी दुर्गा राव, न्यायिक सदस्य एवं श्री मंजुनाथ. जी, लेखा सदस्य के समक्ष  
**BEFORE SHRI V. DURGA RAO, HON'BLE JUDICIAL MEMBER AND  
SHRI MANJUNATHA. G, HON'BLE ACCOUNTANT MEMBER**

आयकर अपील सं./ITA No.: **988/Chny/2022**

**&**

**CO No: 02/Chny/2023**

निर्धारण वर्ष / Assessment Year: 2016-17

Deputy Commissioner of  
Income Tax,  
Central Circle -3(1),  
Chennai.

(अपीलार्थी/Appellant)

Shri. B Bhaskar Reddy,  
v. H.No. 8-2-293/82/A/854C, Road  
No. 44, Jubilee Hills, Hyderabad.

**[PAN: ACXPB-3805-B]**

(Cross Objector)

अपीलार्थी की ओर से/Appellant by : Shri. R. Clement Ramesh Kumar, CIT

Respondent/Cross Objector by : Shri. G. Baskar, Advocate &  
Shri. I. Dinesh, Advocate

सुनवाई की तारीख/Date of Hearing : 17.07.2023

घोषणा की तारीख/Date of Pronouncement : 30.08.2023

**आदेश / O R D E R**

**PER MANJUNATHA. G, ACCOUNTANT MEMBER:**

This appeal filed by the revenue and cross objection filed by the assessee are directed against the order passed by the learned Commissioner of Income Tax (Appeals)-19, Chennai, dated 23.09.2022 and pertains to assessment year 2016-17. Since, facts are identical and issues are common, for the sake of convenience, the appeal filed by the revenue and the cross

objection filed by the assessee are being heard together and are being disposed off, by this consolidated order.

2. The revenue has raised the following grounds of appeal:

*"1. The order of the Id. Commissioner of I.T. (Appeals) is erroneous on facts of the case and in law.*

*2 The learned CIT(A) erred in deleting the addition made towards unaccounted cash, jewellery and unexplained investments without appreciating the facts on record.*

*3. The learned CIT(A) erred in deleting the addition made towards un accounted cash found and seized during the course of search without appreciating that the assessee failed to substantiate the source with evidence and the claims made were only after thought.*

*4. The learned CIT(A) erred in deleting the addition made u/s. 698 of the IT Act, towards un-accounted jewellery found and seized during the course of search without appreciating that the assessee failed to satisfactorily explain the source for the investment in jewellery with documentary evidence, either during the search proceedings or during the assessment proceedings.*

*5. The learned CIT(A) erred in deleting the addition of Rs. 2.70 crores made towards un --explained investment by the assessee and admitted by the assessee under section 132(4) of the IT Act.*

*6. The learned CIT(A) ought to have noted that the admission made u/s. 132(4) of the IT Act was with reference to seized records and corroborated.*

*7. The learned CIT(A) ought to have appreciated the fact that the assessee by making disclosure u/s. 132(4) of the IT Act during the search proceedings, based on seized materials and later retracting the same during assessment proceedings had prevented the Department from making further enquires, to the advantage of the assessee.*

*8. The learned CIT(A) ought to have noted that the retraction made after a lapse of more than one and half years is only an after thought and therefore the admission made u/s. 132(4) of the IT Act is valid and binding.*

*9. For these grounds and any other ground including amendment of grounds that may be raised during the course of the appeal proceedings, the order of Id. CIT(A) may be set aside and that of the Assessing Officer be restored."*

3. The brief facts of the case are that, the appellant is the Vice President (Finance) of M/s. Apollo Hospitals Enterprises Ltd., Hyderabad and Joint Secretary of M/s. Apollo Hospital Education and Research Foundation. A search and seizure operation u/s. 132 of the Income-tax Act, 1961 (hereinafter referred to as "the Act") was conducted in the case of Apollo group on 05.01.2016 and during the course of search, the residence of the appellant was also covered. During the course of search, cash of Rs. 6,32,340/-, unexplained jewellery over and above what was disclosed in wealth tax returns filed by the assessee and certain loose sheets containing various investments was found and seized. A statement u/s. 132(4) of the Act, was recorded from the appellant and called upon the assessee to explain source for cash and unexplained jewellery. The appellant was called upon to explain jotting recorded in loose sheets, where the

appellant had admitted undisclosed income of Rs. 2.70 crores, to cover up various discrepancies and investments.

4. Consequent to search, the case was taken up for assessment. During the course of assessment proceedings, the Assessing Officer, called upon the assessee to explain source for cash found at the time of search amounting to Rs. 6,32,340/-. The Assessing Officer, had also called upon the assessee to explain unexplained jewellery and source for investments. In response, the assessee submitted that out of cash seized amounting to Rs. 6,32,340/-, a sum of Rs. 1,32,140/- is out of his past savings and balance of Rs. 5 lakhs belongs to his aunt Smt. Padmavathamma, and she had kept the cash with the appellant for safe keeping as she was travelling abroad. The assessee has also explained unexplained jewellery and argued that said jewellery belongs to his family members and was acquired over the years. The appellant had also explained the contents of seized material and entries recorded therein and argued that seized documents contains investment made to Chit Funds and purchase of property and all transactions has been recorded/included in his regular return of income filed for

relevant assessment year. The Assessing Officer, however, was not convinced with the explanation furnished by the assessee and according to the Assessing Officer, the assessee could not explain source for cash found during the course of search and also failed to explain excess jewellery found during the course of search. Therefore, made additions towards cash found during the course of search amounting to Rs. 6,32,340/- and unexplained jewellery amounting to Rs. 16,93,524/-. The Assessing Officer, had also made additions towards voluntary admission of undisclosed income of Rs. 2.70 crores on the ground that averment filed by the assessee after a gap of more than one year from the date of search is an afterthought and assessee could not explain how admission made during the course of search is incorrect.

5. Being aggrieved by the assessment order, the assessee preferred an appeal before the Id. CIT(A). Before the Id. CIT(A), the assessee has reiterated his arguments made before the Assessing Officer and explained cash found and seized during the course of search including unexplained jewellery. The appellant had also explained additions made towards voluntary admission of undisclosed income in the

statement recorded u/s. 132(4) of the Act. The Id. CIT(A), after considering relevant submissions of the assessee and also by following certain judicial precedents, deleted additions made by the Assessing Officer towards cash found and seized during the course of search and also additions made towards unexplained jewellery. The Id. CIT(A), had also deleted additions made by the Assessing Officer towards voluntary admission of undisclosed income by holding that without any corroborative evidence admission of statement u/s. 132(4) of the Act, cannot be taken as a conclusive and thus, directed the Assessing Officer to delete additions made towards admission of undisclosed income. In so far as legal ground taken by the assessee in light of observation of the Assessing Officer in the assessment order, on the issue of notice u/s. 153A of the Act, the Id. CIT(A) observed that said observation is only a typographical error and as per records available on record, it was observed that no notice u/s. 153A of the Act, was issued for this assessment year and the Assessing Officer had rightly issued notice u/s. 143(2) of the Act and completed assessment u/s. 143(3) of the Act. Aggrieved by the CIT(A) order, the revenue is in appeal and the assessee has filed cross objection.

6. The first issue that came up for our consideration from ground no. 2 & 3 of revenue's appeal is deletion of addition towards cash found and seized during the course of search amounting to Rs. 6,32,340/-. During the course of search u/s. 132 of the Act, sum of Rs. 6,32,340/- was found and seized. The assessee was called upon to explain cash found during the course of search and in response, the assessee in the statement recorded u/s. 132(4) of the Act, admitted that a sum of Rs. 1,32,340/- represents his savings and for balance amount of Rs. 5 lakhs, he was not in a position to explain source and admitted as undisclosed income. During the course of assessment proceedings, the assessee stated that balance cash of Rs. 5 lakhs belongs to his aunt Smt. Padmavathamma, and she kept the money for safe keeping as she was travelling abroad. To support his arguments, the assessee has furnished HDFC bank statement of Smt. Padmavathamma for withdrawal of Rs. 4 lakhs three days before the date of search.

7. The Id. DR, Shri. R. Clement Ramesh Kumar, CIT, submitted that the Id. CIT(A) erred in deleting additions made by the Assessing Officer towards cash found and seized during

the course of search without appreciating the fact that the assessee has failed to substantiate source for cash with evidence and the claim made by the assessee during assessment year is only an afterthought. The Ld. DR, further submitted that if at all, the claim of the assessee is correct that an amount of Rs. 5 lakhs belongs to Smt. Padmavathamma, the assessee should have stated this fact while recording statement u/s. 132(4) of the Act. Since, the assessee could not explain source at the time of search, the averment can only be considered as an afterthought. The Id. CIT(A), without appreciating relevant facts deleted additions made by the Assessing Officer.

8. The Ld. Counsel for the assessee, on the other hand supporting the order of the Id. CIT(A) submitted that, although the assessee could not explain this fact at the time of search, but subsequently the assessee has obtained confirmation from Smt. Padmavathamma, through e-mail where she had stated that she kept a sum of Rs. 5 lakhs with appellant for safe keeping as he was proceeding to USA. The Ld. Counsel for the assessee, further submitted that the assessee had also furnished necessary bank statement of Smt. Padmavathamma,

to prove withdrawal of cash from bank. The Id. CIT(A), after considering relevant facts as rightly deleted additions made by the Assessing Officer and their order should be upheld.

9. We have heard both the parties, perused materials available on record and gone through orders of the authorities below. As regards a sum of Rs. 1,32,340/-, during the course of search itself the assessee explained that it is out of past savings from salary income. The assessee being a highly paid employee, the possibility of keeping cash to the extent of Rs. 1,32,340/- out of his declared income cannot be ruled out. Therefore, we cannot find fault with reasons given by the Id. CIT(A) to delete additions made towards cash found to the extent of Rs. 1,32,340/-. As regards the balance amount of Rs 5 lakhs, although the assessee could not explain source for cash found and seized during the course of search, but subsequently, obtained the confirmation from Smt. Padmavathamma, and also filed necessary bank statement to prove withdrawal of cash from the bank. As per the explanation furnished by the assessee, Smt. Padmavathamma kept a sum of Rs. 5 lakhs with the appellant for safe keeping of the money as she was proceeding to USA. This fact has

been confirmed by Smt. Padmavathamma, through e-mail. The Assessing Officer never disputed these facts. Therefore, once the Assessing Officer not disputed the fact that a sum of Rs. 5 lakhs belongs to Smt. Padmavathamma and she had admitted to have given cash to the appellant, the Assessing Officer ought to have verified the admission of third party by exercising power provided under the Act. Since, the Assessing Officer does not believed the claim of the assessee, in our considered view, he cannot make addition only on the basis of admission in the statement recorded u/s. 132(4) of the Act and therefore, we are of the considered view there is no error in the reasons given by the Id. CIT(A) to delete additions made towards cash found and seized during the course of search and thus, we are inclined to uphold the findings of the Id. CIT(A) and reject grounds taken by the revenue.

10. The next issue that came up for our consideration from ground no. 4 of revenue's appeal is deletion of additions towards unexplained jewellery amounting to Rs. 16,93,524/-, as per the provisions of section 69B of the Act. During the course of search, gold ornaments worth Rs. 1,22,71,602/- was found. The assessee has declared jewellery in wealth tax

returns filed for relevant assessment years amounting to Rs. 1,05,78,078/-. There is an excess jewellery to the extent of Rs. 16,93,524/-. The assessee was called upon to explain jewellery with necessary bills and source for investment. Since, the assessee could not explain excess jewellery found during the course of search, the Assessing Officer made additions u/s. 69B of the Act.

11. The Id. CIT-DR, Shri. R. Clement Ramesh Kumar, submitted that the Id. CIT(A) erred in deleting additions made towards unaccounted jewellery without appreciating fact that, the assessee failed to satisfactorily explain the source for investment in jewellery with documentary evidence either during the course of search or during assessment proceedings. The Id. DR, further submitted that at the time of search, the assessee could not produce any bills for purchase of jewellery and also explained source. The Id. CIT(A), without appreciating admission of the assessee deleted additions on the basis of statement of the assessee that excess jewellery found during the course of search belongs to his family members.

12. The Ld. Counsel for the assessee, Shri. G. Baskar, Advocate, supporting the order of the Id. CIT(A) submitted that, at the time of search, due to confused state of mind, the assessee could not explain excess jewellery found over and above what was disclosed in the wealth tax returns filed for relevant assessment year. During the course of assessment proceedings, the assessee explained with necessary details that excess jewellery belongs to his married daughter and unmarried daughter and also reconciled excess jewellery quantified by the Department. The Id. CIT(A), after considering relevant submissions of the assessee and also by taking note of CBDT Circular, fairly estimated jewellery of other family members and observed that addition is not warranted towards excess jewellery quantified during the course of search.

13. We have heard both the parties, perused materials available on record and gone through orders of the authorities below. The Assessing Officer has quantified excess jewellery in terms of value with reference to quantity of jewellery found during the course of search. Further, there is no segregation as to how much jewellery belongs to assessee and to his

family members. It is a common practice in Indian society that jewellery belonging to all family members are kept in a common place and also during the course of search the same is identified and not segregated for the purpose of valuation. But, in the present case, no such exercise was carried out by the Department. Further, during the course of assessment proceedings, the assessee has filed details of jewellery belongs to his wife and other family members and also reconciled jewellery found during the course of search with wealth tax returns filed by his wife Smt. B. Kusuma kala, for assessment year 2012-13. As per the details filed by the assessee, the family members of the appellant including his married daughter and un-married daughter are having jewellery within the limit specified by the CBDT for the purpose of seizure during the course of search. Further, if you consider the jewellery owned by other family members, then there is no excess jewellery as quantified by the Department during the course of search. The Id. CIT(A), after considering relevant facts has rightly deleted additions made by the Assessing Officer towards unexplained investment in jewellery amounting to Rs. 16,93,524/-. Thus, we are inclined to uphold the

findings of the Id. CIT(A) and reject grounds taken by the revenue.

14. The next issue that came up for our consideration from ground no.5 to 8 of revenue's appeal is deletion of addition of Rs. 2.70 crores made towards undisclosed income on the basis of statement recorded u/s. 132(4) of the Act. During the course of search, certain loose sheets comprising promissory notes, signed cheque leaves etc., as per annexure A/BBR/HYD/D/02 was found and seized. The seized loose sheets were confronted with the assessee and a statement u/s. 132(4) of the Act was recorded. In the statement, the assessee admitted undisclosed income of Rs. 2.70 crores in his hand and Rs. 30 lakhs in the hands of Smt. B. Kusuma Kala, to cover up various discrepancies and investments. The assessee further stated that, the loose sheet page no. 16 to 23 did not pertain to any transaction or investment and in fact, those papers related to Shri GR Reddy, who happened to be one of the patients in Apollo Hospital. Loose sheet page no. 30 to 35 contains investment in M/s. BBR Securities Pvt Ltd. During the course of assessment proceedings, the assessee explained contents of seized loose papers and argued that investment in

SSV Chit Fund Pvt Ltd and share capital with M/s. BBR Securities Pvt Ltd, is made out of salary income and payment is through bank account. The Assessing Officer, did not accept the explanation of the assessee and according to the Assessing Officer, when the assessee has made admission towards undisclosed income in the statement u/s. 132(4) of the Act, any subsequent averments without corroborative evidence can only be considered as an afterthought and thus, rejected arguments of the assessee and made additions towards voluntary admission of undisclosed income of Rs. 2.70 crores.

15. The Id. CIT-DR, Shri R. Clement Ramesh Kumar, submitted that the Id. CIT(A) erred in deleting the addition of Rs. 2.70 crores made towards unexplained investment and admitted by the assessee in the statement recorded u/s. 132(4) of the Act, without appreciating fact that by admitting undisclosed income, the appellant has prevented the Department for further probe on loose sheets found during the course of search. The Id. CIT-DR, further submitted that the admission in the statement u/s. 132(4) of the Act is not only based on confession, but also backed by incriminating material found during the course of search, which clearly shows

unexplained investment in Chit Fund and share capital of company. The Id. CIT(A), without appreciating relevant facts simply deleted additions made by the Assessing Officer.

16. The Ld. Counsel for the assessee, supporting the order of the Id. CIT(A) submitted that, the loose sheets found during the course of search did not contain any undisclosed income as alleged by the Assessing Officer. Further, the assessee has explained contents of seized material with reference to bank statement and also proved that investment in SSV Chit Fund and share capital of company is out of salary income. The Assessing Officer, has made additions towards undisclosed income only on the basis of statement recorded from the appellant u/s. 132(4) of the Act, without any reference to corroborative evidence. The Id. CIT(A), after considering relevant facts has rightly deleted additions made by the Assessing Officer and their order should be upheld.

17. We have heard both the parties, perused materials available on record and gone through orders of the authorities below. The Assessing Officer has made additions of Rs. 2.70 crores towards undisclosed income on the basis of statement

recorded u/s. 132(4) of the Act. We have gone through relevant question and answers of statement recorded from the assessee and more particularly question no 21 of the statement and answer given by the assessee. In the said statement, there is no classification of any undisclosed investment in any kind of assets including Chit fund or share capital. We further noted that, the loose sheets contain certain jotting in respect of investment in chit fund and share capital of a company. The assessee has explained investment in chit fund and all payments to chit funds is through proper banking channel and out of salary income of the appellant. In respect of remaining loose sheets, the appellant explained those loose sheets belongs to Shri G.R. Reddy, who is one of the patient of Apollo Hospital and said loose sheets does not contain any undisclosed income of the appellant. From the contents of loose sheet and statement recorded from the appellant during the course of search, it is abundantly clear that the admission of undisclosed income of Rs. 2.70 crores is not on the basis of any material found during the course of search, which satisfies any kind of investment in assets. Further, there is no classification of any investment in asset or any expenditure which is outside the books of accounts of the

assessee. Therefore, we are of the considered view that additions of Rs. 2.70 crores towards voluntary disclosure of undisclosed income is only on the basis of statement recorded u/s. 132(4) of the Act, but not based on any material found during the course of search. It is a well established principle of law from the decision of Hon'ble Supreme Court in the case of Kashmira Singh vs State of MP (AIR 1952 SC 159), where it has been clearly held that, the admission should not be the foundation of assessment, instead, independent evidence should form the basis of assessment, while admission supplements it. The CBDT has very clearly emphasized the need to focus on gathering evidences during the course of search/survey, rather than obtaining admission. The Hon'ble Supreme Court in the case of Pullangode Rubber Produce Co Ltd vs State of Kerala [1973] 91 ITR 18 (SC), held that although admission is an extremely important piece of evidence, but it cannot be said that it is conclusive. The sum and substance of ratio laid down by various courts including the Hon'ble Apex Court and also emphasis of CBDT is that admission in a statement u/s. 132(4) of the Act, cannot be taken as conclusive evidences unless said admission is supported by evidence. In the present case, from the

statement recorded from the assessee, we find that the Department has taken a confession statement from the assessee towards undisclosed income, without there being any material found during the course of search, which satisfies undisclosed income in any kind of asset or investment. The Id. CIT(A), after considering relevant submissions of the assessee and also taking note of various facts has rightly deleted additions made by the Assessing Officer towards undisclosed income, on the basis of admission in the statement recorded u/s. 132(4) of the Act. Thus, we are inclined to uphold the findings of the Id. CIT(A) and reject grounds taken by the revenue.

18. In the result, appeal filed by the revenue is dismissed.

**CO No: 02/Chny/2023:**

19. The assessee has raised the following grounds of appeal:

*1.1 The CIT(A) failed to appreciate the fact that the A.Y. 2016-17 being the year of search, notice issued u/s.153A of the Act is not valid and ought to have quashed the assessment.*

*1.2 The CIT(A) having himself taken note of the fact that there is a violation of provisions of the Income Tax Act and the instructions of the CBDT by the AO, he ought to have quashed the entire assessment proceedings as ab-initio void.*

*1.3 The CIT(A) having himself taken note of the fact that proceedings having been picked up for scrutiny for verification of investment and income from derivatives which was accepted ought to have quashed the assessment which travels beyond that issue.*

*2.1 The order of the Ld. CIT(A) is correct and in consonance with law and facts to the extent it allows the appeal of the Respondent / Cross-objector on merits of the additions made.*

*2.2 The CIT(A) has rightly deleted the addition of Rs.16,93,524/- u/s.69B of the Act after taking into consideration the CBDT circular.*

*2.3 The CIT(A) has rightly deleted the addition of Rs.6,32,340/- being cash found during the course of search.*

*3.1. The CIT(A) has rightly deleted the addition of Rs.2.7 crore on the ground that the sworn statements without any corroborative evidences cannot be relied to make addition.*

*3.2. The CIT(A) has rightly deleted the addition on the ground that there is no corroborative incriminating material seized during search.*

*4. Any other ground of Cross Objection that may be taken up at the time of hearing. Dated at Hyderabad on this the 07<sup>o</sup> day of February, 2023."*

20. The solitary legal issue that came up for our consideration from ground no. 1.1 to 1.3 of assessee's cross objection is validity of assessment order passed by the Assessing Officer u/s. 143(3) r.w.s. 153(1)(b) of the Act . The Ld. Counsel for the assessee, referring to para 3 of assessment order submitted that. the Assessing Officer has issued notice u/s. 153A of the Act. dated 27.03.2017 for the assessment year 2016-17, although the impugned assessment year is the

year of search which falls outside the scope of provisions of section 153A of the Act. He further submitted that, the Assessing Officer has issued notice u/s. 143(2) of the Act, dated 05.07.2017 and specified that case is selected for limited scrutiny to verify certain issues, however the assessment has been framed on the basis of various incriminating material claimed to have been found during the course of search, contrary to the circular issued by the CBDT. Therefore, he submitted that the assessment order passed by the Assessing Officer should be quashed.

21. The Id. CIT-DR, Shri. R. Clement Ramesh Kumar, supporting the order of the Id. CIT(A) submitted that, the Id. CIT(A) has recorded categorical findings in para 7.3 of his order, that as per the assessment records no notice u/s. 153A of the Act, was issued to the appellant and a reference to this effect by the Assessing Officer in para 3 of assessment order is only a typographical error. Further, the Assessing Officer has rightly issued notice u/s. 143(2) of the Act and also framed assessment u/s. 143(3) of the Act. Further, although the notice issued u/s. 143(2) of the Act, specified for verification of certain issues, but the impugned assessment year is the year

of search, the relevant materials found during the course of search and statement recorded from the assessee needs to be considered to frame the assessment. Since, there are certain issues with reference to incriminating material found during the course of search, coupled with statement recorded from the assessee, the Assessing Officer has rightly completed the assessment, after considering various material found during the course of search. Therefore, it cannot be said that the assessment order passed by the Assessing Officer is null and void.

22. We have heard both the parties, perused materials available on record and gone through orders of the authorities below. It was the categorical findings of the Id. CIT(A) that, although the Assessing Officer referred to notice u/s. 153A dated 27.03.2017 in Para 3 of assessment order, but no such notice was issued to the assessee as per assessment records. It was further observed that, the Assessing Officer inadvertently mentioned in the assessment order that notice u/s. 153A of the Act was issued instead of notice u/s. 142(1) of the Act. In our considered view, the observation of the Assessing Officer in para 3 of assessment order appears to be

typographical error in so far as the pre-assessment notice issued for taking up the case for scrutiny assessment. Therefore, we are of the considered view that, when the substantive issue of assessment is subject matter of search operation conducted u/s. 132 of the Act and also the impugned assessment year is the year of search, which falls outside the scope of provisions of section 153A /153C of the Act, in our considered view, the question of issue of notice u/s. 153A of the Act does not arise. Further, when the assessment records clearly shows that no such notice was issued u/s. 153A, then mere reference to section in the assessment order does not nullify the whole assessment proceedings. Therefore, we are of the considered view that, there is no merit in the ground taken by the assessee challenging the validity of assessment order and thus, we reject ground of cross objection filed by the assessee on this issue.

23. The next issue that came up for our consideration from ground 2.1 to 3.2 of cross objection filed by the assessee is towards addition made by the Assessing Officer for cash found during the course of search, unexplained jewellery and addition towards admission of undisclosed income. Since, the

appeal filed by the revenue on these issues is dismissed, the grounds of cross objection filed by the assessee becomes infructuous and thus, other grounds taken by the assessee on the issue of additions made towards cash found during the course of search and unexplained jewellery and also additions towards undisclosed income are dismissed as infructuous.

24. In the result, appeal filed by the revenue and cross objection filed by the assessee are dismissed

Order pronounced in the court on 30<sup>th</sup> August, 2023 at Chennai.

**Sd/-**

(वी दुर्गा राव)

**(V. DURGA RAO)**

न्यायिकसदस्य/**Judicial Member**

**Sd/-**

(मंजुनाथ. जी)

**(MANJUNATHA. G)**

लेखासदस्य/**Accountant Member**

चेन्नई/Chennai,

दिनांक/Dated: 30<sup>th</sup> August, 2023

**JPV**

आदेश की प्रतिलिपि अग्रेषित/Copy to:

1. अपीलार्थी/Appellant
2. प्रत्यर्थी/Respondent
3. आयकर आयुक्त/CIT
4. विभागीय प्रतिनिधि/DR
5. गार्ड फाईल/GF