

**IN THE INCOME TAX APPELLATE TRIBUNAL
DELHI BENCH 'E', NEW DELHI**

**BEFORE MR. S. RIFAUR RAHMAN, ACCOUNTANT MEMBER
AND MS. MADHUMITA ROY, JUDICIAL MEMBER**

**I.T.A. No. 458 /Del/2022
(Assessment Year : 2015-16)**

Millenium Vinimay Pvt. Ltd., DPT, 801, DLF Prime Tower, Plot No.F- 79 & 80, Okhla Industrial Area, Phase-1, New Delhi	Vs.	ACIT Central Circle – 28 New Delhi
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PAN: AAECM 5383 R

(Appellant) .. (Respondent)

And

**I.T.A. No. 827/Del/2022
(Assessment Year : 2015-16)**

DCIT Central Circle -28 Delhi	Vs.	Millenium Vinimay Pvt. Ltd., 164, M.G. Road, Budge, West Bengal – 700 137
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PAN: AAECM 5383 R

(Appellant) .. (Respondent)

Appellant by :	Shri Gautam Jain, Adv. Shri Lalit Mohan, C.A. Shri Parth Singhal, Adv.
Respondent by :	Shri Anshul, Sr. D.R.

Date of Hearing	28.05.2024
Date of Pronouncement	31.05.2024

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ORDER

PER MS. MADHUMITA ROY – JUDICIAL MEMBER :

The cross appeals filed by the respective parties are directed against the order dated 07.02.2022 passed by the Commissioner of Income Tax (Appeals) – 29, New Delhi under section 250(6) of the Income Tax Act, 1961 (hereinafter referred as to ‘the Act’) arising out of the order dated 30.12.2018 passed by the ACIT, Central Circle – 28, New Delhi under Section 153C read with Section 153A of the Act for Assessment Year 2015-16.

2. The appellant, a domestic company filed its original return of income under Section 139 of the Act on 29.11.2016 declaring income at Rs.95,54,490/-. The same was processed under section 143(1) of the Act.

3. On the basis of input out of search action carried by the Economic Offence Wing CID, Bangalore in M/s PSK Finance Solutions Pvt. Ltd. group at Bangalore on 05.08.2015, a search under Section 132A of the Act was conducted at the premises of PSK Finance Solutions Pvt. Ltd. at Bangalore and on the residential premises of the shareholders of the said company at Noida on 08.08.2015 wherein statement of one Mr. Naresh Mohan, Director of PSK Finance Solutions Pvt. Ltd. was also recorded by the Revenue Department under Section 132(4) of the Act on 08.08.2015 at his residential premises at Noida. Certain documents allegedly belonging to the appellant company were found and seized

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during the search action. Thereafter, the case of the appellant company was centralized with the Central Circle – 28, New Delhi. The case of the searched party namely the entity of PSK Group was also assigned with the same AO and the case of the search of Shri Naresh Mohan and Mithilesh Saxena, too. The Learned AO has recorded satisfaction and conveyed to the Learned AO of the appellant that the documents seized belong to the assessee. After recording the satisfaction for initiating proceedings under section 153C of the Act, the AO of the assessee has issued notice on the appellant under Section 153C of the Act on 05.12.2017. In response thereto, the assessee furnished the return of income declaring total income at Rs.95,54,490/-. The re-assessment under Section 153C of the Act was completed upon determining the total income of the appellant at Rs.14,38,73,770/-. It was further confirmed by the First Appellate Authority upon restricting the addition to Rs.4,94,94,280/- which is in appeal before us.

4. At the time of the hearing of the instant appeal, the Learned Counsel appearing for the assessee submitted before us that the notice issued under Section 153C of the Act is not valid and the same is liable to be quashed in view of the fact that documents seized from the premises of PSK Group at the most can be said to be ‘relating’ to the appellant company but not ‘belong’ to the appellant company. As per the provision of Section 153C(1) of the Act, applicable with the effect from A.Y. 2015-16, the proceeding under Section 153C of the Act could only be initiated in case of a third party only in the event the AO of the searched party as

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also the AO of the third party are satisfied that the documents, seized from the premises of the searched belong to the third party.

5. The appellant before us, also filed additional grounds of appeal challenging the order of assessment suffered from jurisdictional error in the absence of valid approval obtained in accordance with law under Section 153D of the Act. As this legal ground preferred before us for the first time, Learned AR relied upon the judgment passed by the Hon'ble Supreme Court in the case of National Thermal Power Corporation Ltd. vs. CIT, reported in 229 ITR 383, wherein the question of law though raised before the Tribunal for the first time, the same has been allowed in order to assess the tax liability of the assessee correctly.

Having regard to the said ratio laid down by the Hon'ble Apex Court, we admit this ground of appeal preferred by the assessee.

6. Since the maintainability of the proceeding has been challenged before us which goes to the root of the matter, we have thought it fit to decide the same at the very threshold. On this aspect it is the argument advanced by the Learned AR that the order passed by the Learned AO is bad in law in view of the common approval being granted by the Additional CIT dated 18.06.2018 along with other 6 matters of different assessment year. In this regard he has drawn our attention to the approval dated 18.06.2018 issued under the signature of the ACIT, Central Range – 7, New Delhi annexed at page 453 to the paper book filed before us.

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On the other hand the Ld Dr supported the order passed by the authorities below and submitted that the approval so granted is in accordance with law.

7. We have heard the rival submissions made by the respective parties and we have further considered the relevant materials available on record.

8. We have further perused the copy of the approval dated 18.06.2018 issued under the signature of the ACIT, Central Range – 7, New Delhi is annexed at page 453 to the paper book filed before us, the content whereof is as follows:

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Office of the
Additional Commissioner of Income Tax
Central Range-7, Room No. 329
E-2, Jhandewalan Extension
New Delhi

453

F. No. Addl. CIT/CR-7/2018-19/307

Dated: 18.06.2018

To

The Joint Commissioner of Income Tax(OSD)
Central Circle-28,
New Delhi

Sub: Approval u/s 153D of the I.T. Act, 1961 in case of M/s Millenium Vinimay Pvt. Ltd., PAN- AAECM5383R (M/s PSK Finance Solution Pvt. Ltd. Group), A.Ys. 2010-11 to 2016-17- req.

Please refer to your letter F. No. JCIT(OSD)/CC-28/2018-19/142 date 11.06.2018 on the above subject.

2. Approval is hereby accorded u/s 153D of the Income Tax Act, 1961 to the dra assessment orders in the following cases, on the basis of the detailed discussion with you time to time, information available on record, facts mentioned in the Apprais Report and relevant seized documents perused by you & brought to the notice of undersigned.

S. No.	Name of the Assessee	A.Y.	Assessed Income (in Rs.)
1	M/s Millenium Vinimay Pvt. Ltd.	2010-11	Rs. 4,25,60,480/-
2	M/s Millenium Vinimay Pvt. Ltd.	2011-12	Rs. 1,83,25,560/-
3	M/s Millenium Vinimay Pvt. Ltd.	2012-13	Rs. (-)14,040/-
4	M/s Millenium Vinimay Pvt. Ltd.	2013-14	Rs. 91,536/-
5	M/s Millenium Vinimay Pvt. Ltd.	2014-15	Rs. 40,87,944/-
6	M/s Millenium Vinimay Pvt. Ltd.	2015-16	Rs. 14,38,73,770/-
7	M/s Millenium Vinimay Pvt. Ltd.	2016-17	Rs. 1,38,70,080/-

Copies of the final assessment orders should be forwarded to this office immediately after passing the orders as per amendments suggested on the not attachment herewith this letter. Proposal for retention of seized material should also forwarded to this office within time as per IT Act, 1961.



(Prakhar Viplava Gup)
Additional Commissioner of Income T
Central Range -7, New De

9. On this aspect the Learned AR submitted that the Common approval is itself bad in law since it has to be granted separately for each

assessment year for each assessee and in absence of it, approval so granted is not in accordance with law. He further contended that the approval was granted on same day when the Learned Assessing Officer sought for approval from the Learned Additional Commissioner of Income Tax, Central Range-7, New Delhi. Such approval is the result of non-application of mind and is subject to certification of the Learned Assessing Officer. In fact the assessment records, seized material and appraisal report must be made available to the Approving Authority and approval must reflect the application of mind to the facts of the case and in absence thereof approval granted under Section 153D of the Act is not in accordance with law. In support of his argument he has further relied upon a judgment passed by the Hon'ble Delhi High Court in the case of Veena Singh vs. ACIT in ITA Nos.294 & 295/Del/2022.

We find that the Ld DR has not been able to controvert the above submissions made by the Ld AR. Neither has come forward with any judgment contrary to the stand taken by the Ld AR.

10. We have considered the judgment passed by the Hon'ble Delhi High Court in the case of Veena Singh vs. ACIT (supra) as relied upon by the assessee. While dealing with this particular issue and finalizing the same in favour of the assessee the Hon'ble Court has been pleased to observe as follows:

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“4. Aggrieved by the assessment order dated 21/12/2018, the assessee preferred an appeal before the CIT (A). The Ld. CIT (A) vide order dated 16/11/2021, partly allowed the Appeal filed by the assessee. Aggrieved by the order of the Ld. CIT(A) dated 16/11/2021, the assessee preferred the present Appeal on the grounds mentioned above.

5. The assessee has raised an additional grounds of Appeal contending that the assessment orders passed by the A.O. and the order of the CIT(A) are void-ab-initio as the assessment orders have been passed consequential to the invalid /illegal approval made u/s 153D of the Act by additional CIT. Since the additional ground being legal and jurisdictional issue, we have heard on the said ground.

6. The Ld. Counsel for the assessee submitted that the assessment order passed u/s 153A/143(3) of the Act is void-ab -initio as the said assessment order has been passed based on combined/consolidated approval issued u/s 153D of the Act by the Additional CIT/Central Range-7 Delhi dated 21/12/2018 without any reference on the order sheet and the same is mechanical one, therefore submitted that the impugned assessment orders and the orders of the Commissioner are liable to be quashed. To support the said submission the Ld. Assessee's Representative relied on the order of the Co-ordinate Bench in the case of Shiv Kumar Nayyar Vs. ACIT in ITA No. 1282 to 1285/Del/2020 dated 26/07/2023 and also the Judgment of the Jurisdictional High Court in the case of Maruti Suzuki reported at 244 ITR 303.

7. The Ld. Departmental Representative submitted that there is no infirmity the approval granted u/s 153D of the Act and the Ld. Additional CIT has applied his mind and further submitted that the facts in the Judgments referred by the Assessee's Representative are distinguishable. The Ld. Departmental Representative further submitted that there is no format for recording the approval, therefore, the assessee's Additional Ground is liable to be dismissed.

8. We have heard both the parties and perused the material available on record and gave out thoughtful consideration. For the purpose of adjudicating the issue in hand and for the ready reference the approval accorded by the Additional Commissioner of Income Tax, Central Circle, Range-7, New Delhi dated 21/12/2018 is reproduced as under:

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E-Z, Jhandewalan Extension

New Delhi

F. No. Addl. CIT/CR-7/2018-19/10440

Dated:
21.12.2018

To

The Assistant
Commissioner of
Income Tax
Central Circle-25,
New Delhi

Sub: Approval u/s 153D of the IT Act, 1961 in case of Ms. Veena Singh (PAN: AXJPS9588H) Mohnish Kumar Mohan Mukkar Group-A.Y. 2011-12 to 2017-18 reg

Please refer to your letter F. No, ACIT/CC-25/2018-19/
dated 27.12. 2018 on the above subject

2. Approval is hereby accorded- u/s 153D of the Income Tax Act, 1961 to the draft assessment orders as amended In the following, .cases, on the basis of the detailed discussion with you time-to time, information available on-record, facts mentioned in the Appraisal Report and relevant seized documents perused by you & brought to the notice of undersigned.

No	Name of the assesses	PAN	KY.	Returned Income	Assessed Income
1	Ms. Veena Singh	AXJPS9588H	2011-12	7,31890/-	14,11,393/-
2	Ms. Veena Sindh	AXJPS8588H	2012-13	17,77,440/-	37,27,440/-
3	Ms. Veena Singh	AXJPS9588H	2013-14	25,57,350/-	57,87,350/-
4	Ms. Veena Singh	AXJPS9588H	2014-15	10,99v220/-	52,29,220/-
5	Ms. Veena Singh	AXJPS9588H	2015-16	7,47,730/-	33,69,650/-
6	Ms, Veena Singh	AXJPS9588H	2016-17	13,18,830/-	182,31,454/-
7	Ms; Veena Singh	AXJPS9588H	2017-18	1165,510/-	2,52,33,8201-

3. Copies of the final assessment orders should be forwarded to

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this office immediately after passing the orders. Proposal -tor retention of seized- material, should also be forwarded to this, office within time as per IT Act, 1961. Before passing the final order, in case, there is requirement of protecting the- interest of revenue, permission u/s 281B from Pr. CIT(.C)3, New Delhi should be taken: Office notice indicating additions in relevant assessment years should be indicated In all Assessment Yean,. A.0 to certify about perusal and verification of data seized in electronic format through working copies having certified hash values as that of original hard drives/CDs/ pen drives/mobile data & any other electronic data, You have also certified to the undersigned that all Information available In AIR/CIB/from other Law Enforcement Agencies have been properly scrutinized by you before finalizing the draft assessment.

(Vivek Gupta)

*Additional Commissioner of
Income Tax Central
Range -7. New Delhi*

9. *On plain reading of the above appeal, it is found following:-*

(i) A common and consolidated approval has been granted for AY 2011-12 to 2017-18 and there is no year wise reasoning in the said approval granted u/s 153D of the Act.

(ii) There is only a reference of a letter F No. ACIT/CC-25/2018-19 dated 21.12.2018 of Assistant Commissioner of Income Tax, Central Circle-25, but there is no reference regarding the draft assessment order being sent for approval of the Additional Commissioner of Income Tax.

(iii) The letter requesting accord of approval u/s 153D of the Act has been returned by the Assistant Commissioner of Income Tax on 21.12.2018, the Additional Commissioner of Income Tax granted the approval u/s 153D of the Act on the very same date i.e. on 21.1.2018 and the impugned assessment order has also been passed on 21.12.2018.

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(iv) *The approval dated 21.12.2018 was not absolute, while granting the approval u/s 153D of the Act, the Additional Commissioner of Income Tax in Para 3 mentioned as under:-*

“Office notice indicating additions in relevant assessment years should be indicated In all Assessment Yean,. A.0 to certify about perusal and verification of data seized in electronic format through working copies having certified hash values as that of original hard drives/CDs/ pen drives/mobile data & any other electronic data.”

(v) *The impugned approval passed u/s 153D of the Act was apparently issued in mechanical and hurried manner without mentioning the reasons and the same has been issued without application of mind.*

10. *The above mentioned approval accorded makes it evident that such approval is generic and listless and accorded in a blanket manner without any reference to any issue in respect of any of 5 assessment years. Apparently, the approval has been granted on a dotted line without any availability of reasonable time which firms up the belief towards non application of mind. Besides, the approval has been granted in a consolidated manner for all assessment years for which voluminous assessment orders were prepared. The whole sequence of action apparently appears to be illusory to merely meet the requirement of law as an empty formality. It is also alleged on behalf of assessee that the draft assessment orders are not available on record as no such draft Assessment order has been referred while according the approval u/s 153D of the Act.*

11. *The provision of Section 153D of the Act envisages prior approval of JCIT before passing the assessment order, for the purpose of ready reference the provisions of Section 153D of the Act is reproduced as under:-*

Prior approval necessary for assessment in cases of search or requisition.

153D. No order of assessment or reassessment shall be passed by an Assessing Officer below the rank of Joint Commissioner in respect of each assessment year referred

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to in clause (b) of [sub-section (1) of] section 153A or the assessment year referred to in clause (b) of sub-section (1) of section 153B, except with the prior approval of the Joint Commissioner:]

48[Provided that nothing contained in this section shall apply where the assessment or reassessment order, as the case may be, is required to be passed by the Assessing Officer with the prior approval of the "[Principal Commissioner or]

Commissioner under sub-section (12) of section 144BA.]

Rectification of mistake."

12. *It is elementary that whenever any statutory obligation is cast upon any statutory authority, such authority is required to discharge its obligation not mechanically, not even formally but after due application of mind. Thus, the obligation of granting Approval acts as an inbuilt protection to the taxpayer against arbitrary or unjust exercise of discretion by the AO. The approval granted under section 153D of the Act should necessarily reflect due application of mind and if the same is subjected to judicial scrutiny, it should stand for itself and should be self-defending. There are long line of judicial precedents which provides guidance in applying the law in this regard.*

13. *At the cost of repetition, it may be reiterated that in the instant case, approving authority did not mention anything in the approval memo towards his/ her process of deriving satisfaction so as to exhibit his/her due application of mind. We may observe that the above approval letter issued by the Addl. Commissioner says that the approval has been granted subject to certain conditions.*

14. *Plain reading of the letter of approval granted by the Addl. Commissioner, clearly depicts that the Addl. CIT had routinely given approval to the AO to pass the order only on the basis of letter of the Ld. A.O. without any application of mind. From the said approval, it can be easily inferred that the approved has been accorded with certain conditions. Thus, the sanctioning authority had in effect abdicated its statutory functions and delightfully relegated its statutory*

duty to the subordinate AO, whose action the Additional CIT, was supposed to supervise. The said approach of the Additional CIT, Central has rendered the Approval to be a mere formality and cannot be sustained in the eyes of law.

15. *There are several decisions, which supports the view that approval granted by the superior authority in mechanical manner defeats the very purpose of obtaining approval u/s 153D of the Act. Such perfunctory approval has no legal sanctity in the eyes of the law. The decision of the co-ordinate bench in Shreelekha Damani vs. DCIT 173 TTJ 332(Mum.) which has been approved by jurisdictional High Court subsequently, reported in 307 CTR 218 affirms the plea of the Assessee, wherein the Hon'ble Bombay High Court held as under:-*

"1. This appeal is filed by the Revenue challenging the judgment of Income Tax Appellate Tribunal ("the Tribunal" for short) dated 19th August, 2015.

2. Following question was argued before us for our consideration:

"Whether on the facts and circumstances of the case and in law, the Tribunal was justified in holding that there was no 'application of mind' on the part of the Authority granting approval?"

3. Brief facts are that the Tribunal by the impugned judgment set aside the order of the Assessing Officer passed under [Section 153A](#) of the Income Tax Act, 1961 ("the Act" for short) for Assessment Year 2007- 08. This was on the ground that the mandatory statutory requirement of obtaining an approval of the concerned authority as flowing from [Section 153D](#) of the Act, before passing the order of assessment, was not complied with.

4. This was not a case where no approval was granted at all. However, the Tribunal was of the opinion that the approval granted by the Additional Commissioner of Income Tax was without application of mind and, therefore, not a valid approval in the eye of law. The

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Tribunal reproduced the observations made by the Additional CIT while granting approval and came to the conclusion that the same suffered from lack of application of mind. The Tribunal referred to various judgments of the Supreme Court and the High Courts in support of its conclusion that the approval whenever required under the law, must be preceded by application of mind and consideration of relevant factors before the same can be granted. The approval should not be an empty ritual and must be based on consideration of relevant material on record.

5. The learned Counsel for the Revenue submitted that the question of legality of the approval was raised by the assessee for the first time before the Tribunal. He further submitted that the Additional CIT had granted the approval. The Tribunal committed an error in holding that the same is invalid.

6. Having heard the learned Counsel for the both sides and having perused the documents on record, we have no hesitation in upholding the decision of the Tribunal. The Additional CIT while granting an approval for passing the order of assessment, had made following remarks :

"To, The DCIT(OSD)1, Mumbai Subject: Approval u/s 153D of draft order u/s 143(3) r.w.s. 153A in the case of Smt. Shreelekha Nandan Damani for A.Y. 2007-08 reg. Ref: No. DCIT (OSD)1/ CR7/Appr/2010-11 dt. 31.12.2010 As per this office letter dated 20.12.2010, the Assessing Officers were asked to submit the draft orders for approval u/s 153D on or before 24.12.2010. However, this draft order has been submitted on 31.12.2010. Hence there is no much time left to analyse the issue of draft order on merit. Therefore, the draft order is being approved as it is submitted. Approval to the above said draft order is granted u/s 153D of the I. T. Act, 1961."

7. In plain terms, the Additional CIT recorded that the draft order for approval under [Section 153D](#) of the Act was submitted only on 31st December, 2010. Hence, there was

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not enough time left to analyze the issues of draft order on merit. Therefore, the order was approved as it was submitted. Clearly, therefore, the Additional CIT for want of time could not examine the issues arising out of the draft order. His action of granting the approval was thus, a mere mechanical exercise accepting the draft order as it is without any independent application of mind on his part. The Tribunal is, therefore, perfectly justified in coming to the conclusion that the approval was invalid in eye of law. We are conscious that the statute does not provide for any format in which the approval must be granted or the approval granted must be recorded. Nevertheless, when the Additional CIT while granting the approval recorded that he did not have enough time to analyze the issues arising out of the draft order, clearly this was a case in which the higher Authority had granted the approval without consideration of relevant issues. Question of validity of the approval goes to the root of the matter and could have been raised at any time. In the result, no question of law arises.

8. Accordingly, the Tax Appeal is dismissed.”

16. In the case of ACIT, Circle-1 (2) Vs. Serajuddin and Co. the Hon’ble Supreme Court in SLP (Civil) Dairy No. 44989/2023 vide order dated 28/11/2023, dismissed the Appeal filed by the Department of Revenue against the order dated 15/03/2023 in ITA No. 43/2022 passed by the Hon’ble High Court of Orissa at Cuttack, wherein the Hon’ble High Court had quashed the Assessment Order on the ground of inadequacy in procedure adopted for issuing approval u/s 153D of the Act by expressing discordant note on such mechanical exercise of responsibility placed on designated authority under section 153D of the Act.

17. Hence, vindicated by the factual position as noted in preceding paras, we find considerable force in the arguments advanced by the Ld. the Assessee's Representative on the Aditonal Ground of Appeal. In our considered opinion the approvals so granted under the shelter of section 153D of the Act does not pass the test of legitimacy. The Assessment

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orders of various assessment years as a consequence of such inexplicable approval lacks legitimacy. Consequently, the impugned assessments orders in the captioned appeals are non-est and a nullity and hence the same are quashed.

18. In view of prima facie merits found in the legal objections raised in the Addl. Grounds of the Assessee, we do not consider it expedient to look into the aspects on merits of additions/disallowance as the legal objections on sanction granted under Section 153D of the Act has been answered in favour of the Assessee. Thus the other Grounds raised in the Appeals of the Assessee in both the Appeals have rendered infructuous, which do not need any separate adjudication.

19. In the result, the Appeals filed by the Assessee in ITA Nos. 294/Del/2022 and ITA No. 295/Del/2022 are allowed.

11. Upon considering the entire aspect of the matter, we find that the approval has been granted not separately for each assessment year for the assessee whereas the provision of Section 153D of the Act stipulates conditions that no order of assessment or reassessment shall be made by an Assessment Officer below the rank of Joint Commissioner in respect of each assessment year referred to in Clause (b) of Sub Section (1) of Section 153A of the Act or the assessment year referred to in Clause (b) of Sub Section 153B of the Act except the prior approval of the Joint Commissioner. It further appears from the approval dated 08.06.2018 that the same was a common and composite order whereas the Addl. Commissioner is required to verify and approve that each of assessment year is complied with as well as procedural laid down under the Act.

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Such fact clearly reveals non-application of mind on the part of the Learned Addl. Commissioner of Income Tax, Central Range-7, New Delhi. Thus granting approval for all the common years instead of approval under Section 153B for each assessment year separately *de horse* the rules. The said approval is found to have been given in a mechanical and routine manner. We find that the order issuing authority has not discharged its statutory duties cast upon him even by assigning cogent reasons in respect of the issues involved in the matter. Thus granting approval in the absence of due application of independent mind to the material on record for each assessment year in respect of the assessee's case separately vitiates the entire proceedings; the same is found to be arbitrary and erroneous and therefore, liable to be quashed. We are also inspired by the ratio laid down in the Judgment narrated hereinabove passed by the Hon'ble Jurisdictional High Court and respectfully relying upon the same with the above observation, we quash the entire proceeding initiated under Section 153C r.w.s 153A of the Act in the absence of a valid approval granted by the Learned Additional Commissioner of Income Tax, Central Range-7, New Delhi.

12. In the result, appeal of the assessee is allowed.

13. Since the order passed by the Learned CIT(A) is quashed, the appeal filed by the Revenue being ITA No.827/Del/2022 for A.Y. 2015-16 arising out of the same assessment order dated 30.12.2018 has become

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infructuous which does not any separate adjudication. Hence, the same is dismissed.

14. In the combined result, appeal filed by the assessee is allowed and appeal filed by the Revenue is dismissed.

This Order pronounced in Open Court on 31/05/2024

Sd/-
(S. RIFAUR RAHMAN)
ACCOUNTANT MEMBER

Dated 31/05/2024

*Priti Yadav, Sr.PS**

Copy forwarded to:

1. Appellant
2. Respondent
3. CIT
4. CIT(Appeals)
5. DR: ITAT

Sd/-
(Ms. MADHUMITA ROY)
JUDICIAL MEMBER

ASSISTANT REGISTRAR
ITAT NEW DELHI