

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

**Before Shri Waseem Ahmed, Accountant Member &
Shri Soundararajan K, Judicial Member**

ITA No.165/Coch/2024 :Asst.Year 2012-2013
ITA No.54/Coch/2024 :Asst.Year2012-2013

Indira Gandhi Memorial Trust Nellikuzhy PO, Kothamangalam Ernakulam – 686 691. PAN :AAATI5308K.	v.	The Joint Commissioner of Income-tax (Exemption) Ernakulam.
(Appellant)		(Respondent)

Appellant by :Sri.P.T.Joy, CA
Respondent by :Sri.Sanjit Kumar Das, CIT-DR

Date of Hearing : 24.09.2024	Date of Pronouncement : 30.09.2024
-------------------------------------	---

ORDER

Per Bench :

These two appeals filed by the assessee challenging the orders of the CIT(A)/NFAC, Delhi, dated 13.12.2023, against the levy of penalty u/s.271D and 271E of the Act, respectively, in respect of the assessment year 2012-2013.

First we take the appeal ITA No.165/Coch/2023:

2. Delay of 23 days is condoned by considering the assessee's condonation petition explaining the delay(s) as well as going by the decision in the case of Collector Land Acquisition v. Mst.Katiji & Ors. (1987) 167 ITR 471 (SC) settling the issue long back that all such technical aspects

must make way for the cause of substantial justice the delay is condoned and the appeal is admitted for adjudication.

3. Brief facts of the case are that the assessee is a trust registered under the provisions of the Act and run various educational institutions. During the assessment year 2012-2013, the assessment was made without any additions to the income returned by the assessee. On going through the documents the AO found that the assessee had received loans and deposits in cash exceeding Rs.20,000 on various occasions which was elaborated by scrutinizing the ledger account copies of the assessee as well as trustees. Thereafter the AO forwarded the matter to the Joint Commissioner of Income-tax(Exemption),Cochin-18 for initiation of proceedings u/s.271D of the Act for violating provisions of sec.269SS of the Act. The JCIT(E) issued notice and the assessee also submitted their objections, which was not accepted by the JCIT(E) and penalty u/s.271D of the Act was imposed. As against the said penalty order, the assessee filed an appeal before the CIT(A) and contended that the assessee had received a sum of Rs.18 lakh from its trustee Sri.K.P.Shaji by way of bank transfer and the other amounts were received from the employees of the trust as security deposits and the said amounts were utilized in the construction activities carried out by the trust. The ld.CIT(A) had dismissed the appeal by relying on the judgment of the Hon'ble Kerala High Court in the case of CIT v. Al-Ameen Educational Trust, Kulapully, reported in (2018) 92 taxmann.com 128 (Ker.). As

against the said order of the Id.CIT(A), the assessee has filed this present appeal with the following grounds:-

"1. Rejecting our contentions in our reply dated 04-12-2023, as detailed in the statement of facts, the CIT (Appeals) NFAC has confirmed the penalty u/s 271D by his order dated 13-12-2023 and dismissed our appeal. (Copy of the order of CIT (Appeals) NFAC is attached herewith).

. Aggrieved by the order of the CIT(Appeals) NFAC, the appellant assessee is approaching the hon'ble Tribunal for relief on the following grounds:

a) During the first appellate proceedings before the CIT(Appeals), NFAC, we have submitted that in the year 2011-12 the appellant has accepted deposits totaling Rs 3,43,85,000/- from its former employees, out of which Rs 3,15,85,000/- was received in cash and Rs 28,00,000/- received through bank . A detailed list of security deposits accepted by the appellant during the FY2011-12 is attached as Annexure-2. The appellant has received deposits from its employees in cash and these deposits are duly accounted in the books of accounts of the assessee. There is no undisclosed income or evasion of tax as a result of receipt of such deposits. The appellant is furnishing herewith the ledger account copies of all these former employees of the appellant as Annexure-3 and affidavit from the said former employees stating that they have paid deposits to the appellant and these are paid in cash as insisted by the said employees. (Out of the 81 employees from whom cash deposits are received, we are able to produce affidavits from 47 employees, 2 persons passed away and other employees are not available for contact)(Annexure-2)-

b) The appellant has submitted a detailed reply to the CIT(Appeals), NFAC in response to the notice dated 28-11-2023 during the first appellate proceedings, wherein reference was made to the case law Assistant Director of Inspection (Investigation) v. Kum. A.B. Shanthy, (2002) 255 ITR 258 (SC), where the Hon'ble apex court held that the legislature has given discretion to the authority in the matter of levy of penalty under Section 271D of the Act. The Hon'ble apex Court further held that where a reasonable cause exists for transactions covered under Section 269SS, the penalty shall not be imposed merely because it is lawful to do so. In the backdrop of legal position, the facts and circumstances requires to be looked at in cumulative manner to ascertain the existence of mala fide if any.

c) The appellant has also referred to the judgment of the Hon'ble ITAT Mumbai Bench (in appeal dated 31st January, 2020, in *Lodha Builders P.Ltd, Mumbai vs DCIT Cen Cir 7(3), Mumbai*).

In the judgement of the above referred case, the Hon'ble Tribunal stated that the imposition of the penalty under section 271D by the department cannot be mechanical in nature.

d) The Income Tax Appellate Tribunal "C", Bench, Kolkata, in the case of *Auto Fuel Centre, Durgapur Vs J.C.I.T., Circle-1, Durgapur*, (Date of order, 16th March, 2020), (ITA No.398/Kol/2019, AY 2013914) held that "it is an undisputed fact that the penalty u/s. 271E of the Income Tax Act, 1961 was imposed in respect of the repayment in the aggregate sum of Rs. 5,80,000/- being amount so borrowed from the relatives and friends of the partners and as such, the object of the provisions of section 271E read with section 269T of the Act are to be considered in light of the intention of the Legislature enacting such provision. It is settled that the object of introduction of section 269SS and 269T of the Income Tax Act, 1961 is to ensure that a taxpayer is not allowed to give false explanation for his unaccounted money and if he has made some false entries in his accounts, he shall not escape by giving false explanation for the same. The essence of this philosophy was embodied through the introduction of section 269SS and 269T of the Act in the statute which was to eradicate the evil practice of making false entries in account books and later manufacturing explanations in support thereof. While arriving at the above judgement the Hon'ble Tribunal has also taken note of the decision of the Hon'ble Supreme Court in the case of *A.D.I.T. -VS- Kumari A.B. Shanti (2002) 255 ITR 487 (SC)*. The Hon'ble Tribunal further held that "It is important to note that another provision, namely Section 273B was also incorporated which provides that notwithstanding anything contained in the provisions of Section 271D, no penalty shall be imposed on the person or the assessee, as the case may be, for any failure referred to in the said provision if he proves that there was reasonable cause for such failure and if the assessee proves that there was reasonable cause for failure to take a loan other than by account payee cheque or account payee demand draft, then the penalty may not be levied. Therefore, undue hardship is very much mitigated by the inclusion of Section 273B in the Act. If there was a genuine and bona fide transaction and if for any reason the tax payer could not get a loan or deposit by account payee cheque or demand draft for some bona fide reasons, the authority vested with the power to impose

penalty has got discretionary power." "At this juncture it is appropriate to quote the circular issued by the Central Board of Direct Taxes. The CBDT in Circular No.387 dated 06-07-1984 has issued explanatory notes after the Finance Act, 1984, which is given below:

"Unaccounted cash found in the course of searches carried out by the Income Tax Department is often explained by taxpayers as representing loans taken from or deposits made by various persons. Unaccounted income is also brought into the books of account in the form of such loans and deposits, and taxpayers are also able to get confirmatory letters from such persons in support of their explanation".

e) As stated in the above referred legal precedents, it is an established principle that the imposition of penalty u/s 271D should not be blind folded and mechanical. The intention of the legislature in bringing out this section, as referred in the above case laws also reiterates the tenet that the introduction of section 269SS is that the tax payer is not allowed to give false explanation for his unaccounted money. In the instant case of the appellant, the acceptance of deposits are accounted in books of accounts for FY 2011-12 which are audited and Income Tax Returns are filed accordingly. Therefore, there is no malafide intention on the part of the appellant in accepting deposits from employee by way of cash.

f) Thus on the above explained grounds and other grounds, as may be allowed, at the time of proceedings before the Hon'ble Tribunal, the appellant seeks the following reliefs:

3) Relief Sought:

a) The appellant prays for quashing the order of the CIT (Appeals), NFAC dated 13.12.2023 [DIN No & Order No:ITBA/NFAC/S/250/2023-24/1058721442(1)] under section 271D imposing penalty of Rs 3,43,85,000/- on the appellant.

b) Any other order which this Hon'ble Tribunal deem fit and proper and in the circumstances of the case."

4. At the time of hearing, the ld.AR submitted that it is the normal practice of the various institutions to collect some security deposits from the employees, who are appointed as their new employees and all the details about the employees

were furnished before the AO and in fact the notarized affidavit from the employees were also filed before the Id.CIT(A), but without considering the same, the Id.CIT(A) had dismissed the appeal. The Id.AR also contended that there is no suppression of any income and no additions were made by the AO while passing the assessment order and in fact out of the above said security deposit, Sri.Shaji had made the deposit of Rs.18 lakh by transferring the amount from bank account. Further he is also one of the trustees of the assessee-trust, and therefore, the amount that he transferred to the assessee-trust would not fall under the mischief of sec.269SS of the Act, since the section contemplates that “no person shall take or accept from any other person”, that is, the assessee should not receive any loan or deposit from any third party not related to the assessee-trust. Admittedly, in this case the said Sri.Shaji is a trustee of the assessee-trust and therefore, he should not be treated as any other person and in fact the same could not be treated as an offence u/s.269SS of the Act in order to levy penalty u/s.271D of the Act.

5. In coming to the above conclusion, we rely on the judgment of the Hon’ble Madhya Pradesh High Court in 225 ITR 409 in the case of Patiram Jain wherein the term “any other person” was considered and decided in favour of the assessee.

6. Then coming to the security deposits received from various employees of the assessee, we will get some assistance

from the judgment of the Hon'ble Supreme Court reported in (2002) 255 ITR 258 (SC) in the case of Asst. Director of Inspection (Investigation) v. Kumari A.B. Shanthi, wherein the Hon'ble Supreme Court while deciding the validity of sec.269SS and 271D of the Act, had observed as follows:-

".....The object of intro-duding section 26955 is to ensure that a taxpayer is not allowed to give false explanation for his unaccounted money, or if he has given some false entries. in his accounts, he shall not escape by giving false explanation for the same. During search and seizures, unaccounted money is unearthed and the tax payer would usually give the explanation that he had borrowed or received deposits from his relatives or friends and it is easy for the so-called lender also to manipulate his records later to suit the plea of the taxpayer. The main object of section 2695S was to curb this menace. As regards the tax legislations, it is a policy matter, and it is for Parliament to decide in which manner the legislation should be made. Of course, it should stand the test of constitutional validity.

.....

The above dictum applies in full force as regards the present case. The object sought to be achieved was to eradicate the evil practice of making of false entries in the account books and later giving explanation for the same. To a great extent, the problem could be solved by the impugned provision."

7. The Hon'ble Supreme Court in the above judgment had clearly spelt out the reasons for having the provisions in the statute and held that in order to eradicate the evil practice of making of false entries in the account book and later giving explanation for the same, the said provision was made by the legislature. If we consider the above judgment, it is clear that the provision would be attracted if the entire transactions are false or the explanation offered by the assessee is not correct, then only the penalty proceedings can be invoked u/s.271D of

the Act. In the present case before us, the jurisdictional Assessing Officer as well as the JCIT and the CIT(A) had not doubted about the transactions and to that effect no addition or nothing has been made by the AO while framing the assessment. To prove that the transactions are genuine, the assessee also filed various documents including notarized affidavit to show that the security deposits are genuine and would not attract provisions of sec.269SS of the Act and consequently sec.271D of the Act. The jurisdictional AO had not made further inquiries to ascertain the genuineness of the security deposits and in fact the Id.CIT(A) also not considered the notarized affidavit filed before him, but relied on the findings of the JCIT and affirmed the levy of penalty u/s.271D of the Act.

8. Further, the dispute involved in this appeal is only penalty which was levied mechanically without giving any contra evidences to show that the assessee is indulging in the mischief and also without proving that the said security deposits are unaccounted money, the penalty could not be sustained. In respect of the levy of penalty, the Hon'ble Supreme Court in the judgment reported in (1972) 83 ITR 26 (SC) in the case of Hindustan Steel Ltd. v. State of Orissa, wherein the Hon'ble Supreme Court had elaborated the circumstances under which the penalty need not be levied. The relevant portion of the judgment reads as follows:-

“An order imposing penalty for failure to carry out a statutory obligation is the result of a quasi-criminal proceeding, and

penalty will not ordinarily be imposed unless the party obliged either acted deliberately in defiance of law or was guilty of conduct contumacious or dishonest, or acted in conscious disregard of its obligation. Penalty will not also be imposed merely because it is lawful to do so. Whether penalty should be imposed for failure to perform a statutory obligation is a matter of discretion of the authority to be exercised judicially and on a consideration of all the relevant circumstances. Even if a minimum penalty is prescribed, the authority competent to impose the penalty will be justified in refusing to impose penalty, when there is a technical or venial breach of the provisions of the Act or where the breach flows from a bona fide belief that the offender is not liable to act in the manner prescribed by the statute.”

9. By taking into account of the facts and the various documents filed by the assessee before the Id.CIT(A) and also considering the fact that there is no unaccounted money or some false entries in the books of account, we are also of the view that the penalty needs not be levied in this case. Further, in support of the case of the Revenue, the Revenue had not established that there is some unaccounted money and for which false entries were made in the books of account.

10. We are not expressing any opinion on the judgment of the Hon'ble Kerala High Court relied on by the Revenue when the Hon'ble Supreme Court had pointed out the circumstances under which the penalty can be imposed as per sec.271D of the Act and also the when the circumstances under which penalty need not be levied. Accordingly, we set aside the order of the Id.CIT(A) and allow the appeal of the assessee.

Now we take up ITA No.54/Coch/2024

11. The grounds raised read as follows:-

“1. Rejecting our contentions in our reply dated 25-10-2023, as detailed in the statement of facts, the CIT (Appeals) NFAC has confirmed the penalty u/s 271E by his order dated 28-11-2023 and dismissed our appeal. (Copy of the order of CIT (Appeals) NFAC is attached herewith).

2. Aggrieved by the order of the CIT(Appeals) NFAC, the appellant assessee is approaching the hon'ble Tribunal for relief on the following grounds:

a) During the first appellate proceedings before the CIT(Appeals), NFAC, we have submitted that in the year 2011-12 the appellant has repaid deposits totaling Rs 5750000/- to its former employees, out of which Rs 29 lakhs was repaid in cash and Rs 28.50 lakhs repaid through bank. A detailed list of repayments of deposits made by the appellant during the FY 2011-12 is attached as Annexure-1. The list shows that the repayment of all the deposits as made by the appellant during the year are not by cash but only in those cases which are requested by the former employees on their resignation from the appellant are made in cash. (Out of 10 cases where cash repayments are made, one person is a trustee of the appellant Trust (Mr K P Shaji) , 4 cases are former employees locally available, from whom notarized affidavits are taken, 2 persons are in abroad from them emails are received and KYC details available, 2 persons passed away and one person is not available for contact). This is referred in Annexure -1. The appellant is furnishing herewith the ledger account copies of all these former employees of the appellant as Annexure-2 and affidavit from the said former employees stating that they have paid deposits to the appellant and these are repaid in cash on their resignation from the appellant Trust (Annexure-1). Thus the deposits are repaid by the appellant to its former employees in cash on their resignation and these are as requested by them which is reasonable cause under section 273B

b) The appellant has submitted a detailed reply to the CIT(Appeals), NFAC in response to the notice dated 19-10-2023 during the first appellate proceedings, wherein reference was made to the case law Assistant Director of Inspection (Investigation) v. Kum. A.B. Shanthi, (2002) 255 ITR 258 (SC), where the apex court held that the legislature has given

discretion to the authority in the matter of levy of penalty under Section 271D of the Act. The Hon'ble apex Court held that where a reasonable cause exists for transactions covered under Section 269SS, the penalty shall not be imposed merely because it is lawful to do so. Drawing parallel, same proposition would apply in the matter of provisions of Section 271E of the Act which is enacted on the similar footings. Similar proposition was echoed towards existence of reasonable cause by the Hon'ble Delhi High Court in Director of Income Tax vS. All India Deaf and Dumb Society (2006) 198 CTR 376 (Del). In the backdrop of legal position, the facts and circumstances requires to be looked at in cumulative manner to ascertain the existence of mala fide if any.

c) The appellant has also referred to the judgment of the Hon'ble ITAT Visakhapatnam Bench (in appeal No ITA 317/Viz/2019-judgment dated 18-03-2020 in Sudha Agro Oil & Chemical Industries Limited Vs Addl CIT, in the reply to the notice dated 28-11-2023 submitted to the CIT (Appeals), NFAC. In the above referred case, the hon'ble ITAT Visakhapatnam Bench held that "We have heard both the parties and perused the material placed on record. In the instant case, the assessee has repaid the loans borrowed from E. Rajeev and E.V. Sudhakar by way of self cheque withdrawal and in the case of E. Lakshmi and E. Padmapriya also, the amounts were paid, otherwise than by crossed cheque. As verified from the order of the Addl. CIT, the assessee has frequently borrowed monies from directors and shareholders, mostly repaid by crossed cheque as per the details given by the AO, except on one occasion in each case. In all the remaining occasions, the assessee has paid the amounts by way of crossed cheque. The assessee has made the payment by self cheque and drawn the cash and paid the same to the creditors. Prima facie, the assessee has violated the provisions of section 269T of the Act. Further as observed from the penalty order, out of 20 occasions, the assessee has violated the provision on four occasions at the rate of one event in the case of each lender. Thus, we observe that the assessee has mostly repaid the loans by way of crossed cheque and complied with the statute. The reason explained by the assessee was that it has made the payment on the request of the creditor in exceptional circumstances. Further the assessee also explained that E. Rajeev, E. Padmapriya, E. Lakshmi and E.V. Sudhakar are the shareholders of the company. The repayment was made on the demand of the creditor. The Ld. AR further explained and taken us to the account copies of the every creditor, from which we observe that the transactions were duly accounted in the respective accounts. The assessee also paid the interest on the borrowings and claimed the same as expenditure

which was allowed as deduction at the time of passing the order u/s 143(3) in the case of the assessee. The assessee also enclosed income tax returns of the creditors, wherein, it is observed that the interest payment was duly accounted and admitted as income in their hands. From the above information, we find that the transactions are genuine and duly accounted in the books of accounts of the respective persons. There is no reason to suspect the transaction. Apart from the above, all four of them are closely associated with the company, who are supporting the company frequently by advancing monies to the company. Therefore, we find that the transactions are closely associated in respect of day to day affairs as well as the financial transactions of the company.

d) The facts of the case involved in our case are similar to the facts contained in the above decided by the Hon'ble ITAT Visakhapatnam Bench, the said appellant Company borrowed funds from its directors and shareholders and in certain occasions repaid funds in cash and in remaining occasions repaid by way of account payee cheque. The transactions were genuine and accounted in the books of accounts of the Company and the persons to whom the deposits are repaid are persons closely associated with the Company. The facts are similar in the case of this appellant Trust, where the persons to whom the funds are repaid are former employees and Trustee of the Trust and not third parties. The appeal was allowed by the hon'ble ITAT Visakhapatnam Bench.

e) The Income Tax Appellate Tribunal "C", Bench, Kolkata, in the case of Auto Fuel Centre, Durgapur Vs J.C.I.T., Circle-1, Durgapur, (Date of order 16th March, 2020), (ITA No.398/Kol/2019, AY 2013914) held that "It is an undisputed fact that the penalty u/s. 271E of the Income Tax Act, 1961 was imposed in respect of the repayment in the aggregate sum of Rs. 5,80,000/- being amount so borrowed from the relatives and friends of the partners and as such, the object of the provisions of section 271E read with section 269T of the Act are to be considered in light of the intention of the Legislature enacting such provision. It is settled that the object of introduction of section 269SS and 269T of the Income Tax Act, 1961 is to ensure that a taxpayer is not allowed to give false explanation for his unaccounted money and if he has made some false entries in his accounts, he shall not escape by giving false explanation for the same. The essence of this philosophy was embodied through the introduction of section 269SS and 269T of the Act in the statute which was to eradicate the evil practice of making false entries in account

books and later manufacturing explanations in support thereof' While arriving at the above judgement the Hon'ble Tribunal has also taken note of the decision of the Hon'ble Supreme Court in the case of A.D.I.T. -VS- Kumar A.B. Shanti (2002) 255 ITR 487 (SC). The Hon'ble Tribunal further held that "it is important to note that another provision, namely Section 273B was also incorporated which provides that notwithstanding anything contained in the provisions of Section 271D, no penalty shall be imposed on the person or the assessee, as the case may be, for any failure referred to in the said provision if he proves that there was reasonable cause for such failure and if the assessee proves that there was reasonable cause for failure to take a loan other than by account-payee cheque or account-payee demand draft, then the penalty may not be levied. Therefore, undue hardship is very much mitigated by the inclusion of Section 273B in the Act. If there was a genuine and bona fide transaction and if for any reason the tax payer could not get a loan or deposit by account-payee cheque or demand draft for some bona fide reasons, the authority vested with the power to impose penalty has got discretionary power." "At this juncture it is appropriate to quote the circular issued by the Central Board of Direct Taxes. The CBDT in Circular No.387 dated 06-07-1984 has issued explanatory notes after the Finance Act, 1984, which is given below:

"Unaccounted cash found in the course of searches carried out by the Income Tax Department is often explained by taxpayers as representing loans taken from or deposits made by various persons. Unaccounted income is also brought into the books of account in the form of such loans and deposits, and taxpayers are also able to get confirmatory letters from such persons in support of their explanation".

As stated in the above referred legal precedents, it is an established principle that the imposition of penalty u/s 271E should not be blind folded and mechanical. The intention of the legislature in bringing out this section, as referred in the above case laws also reiterates the tenet that the introduction of section 269T is that the tax payer is not allowed to give false explanation for his unaccounted money. In the instant case of the appellant, the repayment of deposits are accounted in books of accounts for FY 2011-12 which are audited and Income Tax Returns are filed accordingly. Therefore, there is no malafide intention on the part of the appellant in repaying certain of the employee deposits by cash.

g) Thus on the above explained grounds and other grounds, as may be allowed, at the time of proceedings before the Hon'ble Tribunal, the appellant seeks the followings reliefs:

3) Relief Sought:

a) The appellant prays for quashing the order of the CIT (Appeals), NFAC dated 28-11-2023 [DIN No & Order No: ITBA/NFAC/S/250/2023-24/1058268711(1)] under section 271E imposing penalty of Rs 34 lakhs on the appellant.

b) Any other order which this Hon'ble Tribunal deem fit and proper and in the circumstances of the case.”

12. In this appeal the assessee had challenged the order of the CIT(A) in which the ld CIT had confirmed the penalty levied u/s 271 E of the Act. The facts are similar to the levy of penalty u/s 271 D of the Act. In the earlier appeal penalty was levied for receiving the deposits in cash but in the present appeal penalty was imposed for returning the deposits by cash. As already discussed the assessee received the deposits by way of security from the newly appointed employees and the same deposits were returned back to the employees when they left the service. The payments were made by cash since they insisted for cash.

13. We have also perused the details furnished by the assessee as annexure 1 and from which we are able to find that not the entire deposits of Rs 57,50,000/ were repaid in cash. A sum of Rs 28.50 lakhs were paid through bank and a sum of Rs 29 lakhs were paid by cash to the assessee's ex-employees. In order to reduce their genuine hardships the assessee had repaid their deposits by cash at the time of their retirement or resignation which can not be found fault with. Even the payment by cash was because of their

insistence. Further the ledger account produced by the assessee would support the case of the assessee. Moreover the assessee also filed affidavits in support of their claim from their ex employees to show that the transactions are genuine. The department has no other documents to disprove the claim of the assessee except relying on the provision. There is not even a single allegation about the unaccounted money or false entries in the books of accounts. The object for the introduction of the provision was not defeated since the assessee had established the facts in detail and therefore we are of the view that it is a fit case for imposing the penalty u/s 271 E of the Act.

14. We are therefore, inclined to apply the very same view taken by us in the other appeal in which we had deleted the levy of penalty imposed u/s 271 D of the Act by taking support from the orders of the Hon'ble Supreme Court cited supra.

15. In the result, both the appeals filed by the assessee are allowed.

Order pronounced on this 30th day of September, 2024.

Sd/-
(Waseem Ahmed)
ACCOUNTANT MEMBER

Sd/-
(Soundararajan K)
JUDICIAL MEMBER

Cochin ; Dated : 30th September, 2024.
Devadas G*

Copy to :

1. The Appellant.
2. The Respondent.
3. The CIT Concerned.
4. The DR, ITAT, Cochin.
5. Guard File.

Asst.Registrar/ITAT, Cochin