

| आयकर अपीलीय अधिकरण न्यायपीठ, मुंबई |
IN THE INCOME TAX APPELLATE TRIBUNAL
"J" BENCH, MUMBAI

BEFORE SHRI NARENDRA KUMAR BILLAIYA, HON'BLE ACCOUNTANT MEMBER
&
SHRI SUNIL KUMAR SINGH, HON'BLE JUDICIAL MEMBER

I.T.A. No. 3784/Mum/2024
Assessment Year: 2014-15

RPS Infolink Private Limited AL-4/16/7, Triveni Apartment Sec-5, Airoli Navi Mumbai Maharashtra - 400708 [PAN: AAGCR2641R]	Vs	Income Tax Officer, Ward - 15(3)(1), Mumbai
अपीलार्थी/ (Appellant)		प्रत्यर्थी/ (Respondent)

Assessee by :	Shri Paras Munot, A/R (Virtually appeared)
Revenue by :	Shri Asif Karmali, Sr. D/R

सुनवाई की तारीख/**Date of Hearing** : 06/11/2024
घोषणा की तारीख/**Date of Pronouncement** : 08/11/2024

आदेश/ORDER

PER NARENDRA KUMAR BILLAIYA, AM:

This appeal by the assessee is preferred against the order of the Id. CIT(A)/Addl./JCIT(A) - 8, Delhi, dated 27/06/2024 [hereinafter 'Id. CIT(A)'] pertaining to AY 2014-15.

2. The solitary grievance of the assessee is that the Id. CIT(A) erred in law and facts in confirming the addition of unexplained cash credit.

3. Briefly stated the facts of the case are that on the basis of the information that the assessee has not filed its return of income for the year under consideration and has received professional receipts of Rs.75,000/- , notices were issued to the assessee u/s 148 of the Act pursuant to which it filed its return of income.

3.1. While scrutinising the return of income, the AO notice that the assessee has shown loan from its director of Rs.1,25,000/- but in the

as the only way to show the opening balance is by submitting the copy of the ledger account. The ledger account of Promod Soni is as under:-

RPS INFOLINK PVT LTD
MUMBAI 400708

Directors Loan-Promod Soni
Ledger Account

1-Apr-2013 to 31-Mar-2014

Date	Particulars	Vch Type	Vch No.	Debit	Page 1 Credit
1-4-2013	Dr Opening Balance				72,000.00
4-4-2013	Cr YES BANK -006283800002306	Payment	1	33,000.00	
5-4-2013	Cr YES BANK -006283800002306	Payment	2	7,500.00	
9-4-2013	Dr YES BANK -006283800002306	Receipt	1		1,25,000.00
10-4-2013	Cr YES BANK -006283800002306	Payment	3	85,000.00	
12-4-2013	Cr YES BANK -006283800002306	Payment	5	11,000.00	
17-4-2013	Cr YES BANK -006283800002306	Payment	6	6,500.00	
5-6-2013	Cr YES BANK -006283800002306	Payment	9	34,000.00	
25-6-2013	Cr YES BANK -006283800002306	Payment	14	6,000.00	
30-7-2013	Cr YES BANK -006283800002306	Payment	26	4,000.00	
				1,87,000.00	1,97,000.00
	Cr Closing Balance			10,000.00	
				1,97,000.00	1,97,000.00

7. A perusal of the above shows that the opening balance was Rs.72,000/- and the assessee has received Rs.1,25,000/- during the year under consideration and has repaid Rs.1,87,000/- and the closing balance is only Rs.10,000/-. All the transactions have been done through banking channels.

8. Considering the facts of the case in totality, we are of the considered view that the assessee has *prima facie* discharged the initial onus cast upon it by the provisions of Section 68 of the Act. Therefore, the additions made by the AO deserves to be deleted. We accordingly direct the AO to delete the impugned addition.

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

Order pronounced in the Court on 8th November, 2024 at Mumbai.

Sd/-
(SUNIL KUMAR SINGH)
JUDICIAL MEMBER

Sd/-
(NARENDRA KUMAR BILLAIYA)
ACCOUNTANT MEMBER

Mumbai, Dated 08/11/2024

S.S.P.

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

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

आदेशानुसार/ BY ORDER,
TRUE COPY

Assistant Registrar
आयकर अपीलीय अधिकरण
ITAT, Mumbai