

**आयकर अपीलीय अधिकरण 'बी' न्यायपीठ चेन्नई में।**  
**IN THE INCOME TAX APPELLATE TRIBUNAL**  
**'B' BENCH, CHENNAI**

महनीय श्री मनोज कुमार अग्रवाल, लेखक सदस्य एवं  
महनीय श्री मनु कुमार गिरि, न्यायिक सदस्य के समक्ष।  
**BEFORE HON'BLE SHRI MANOJ KUMAR AGGARWAL, AM**  
**AND HON'BLE SHRI MANU KUMAR GIRI, JM**

**आयकर अपील सं. ITA No.2455/Chny/2024**  
**(निर्धारणवर्ष / Assessment Year: 2017-18)**

<b>Shri Nagarajan Manivannan</b> Old No.48, New No.100, V.V.Koil Street, Kosapet, Perambur Barracks, Chennai-600 012.	<b>बनम/</b> Vs.	<b>ITO</b> Non-Corporate Ward-10(3) Chennai.
स्थायी लेखासं./जीआइआरसं./PAN/GIR No. <b>AHEPM-6126-A</b>		
(अपीलार्थी/ <b>Appellant</b> )	:	(प्रत्यर्थी / <b>Respondent</b> )

अपीलार्थी की ओरसे/ <b>Appellant by</b>	:	Shri Y. Sridhar (FCA)- Ld.AR
प्रत्यर्थी की ओरसे/ <b>Respondent by</b>	:	Ms.T.M. Suganthamala (Addl.CIT)-Ld. DR

सुनवाई की तारीख/ <b>Date of Hearing</b>	:	09-12-2024
घोषणा की तारीख / <b>Date of Pronouncement</b>	:	09-12-2024

**आदेश / ORDER**

**Manoj Kumar Aggarwal (Accountant Member)**

1. Aforesaid appeal by assessee for Assessment Year (AY) 2017-18 arises out of the order of learned Commissioner of Income Tax (Appeals), National Faceless Appeal Centre (NFAC), Delhi [CIT(A)] dated 31-07-2024 in the matter of an assessment framed by Ld. Assessing Officer [AO] u/s.147 r.w.s. 144 of the Act on 16-05-2023. The sole grievance of the assessee is confirmation of addition of Rs.54.70 Lacs which represent cash deposits in the bank accounts

during demonetization period. The Ld. CIT(A) confirmed the same since the assessee failed to make any representation therein despite being provided with various opportunities of hearing. Aggrieved, the assessee is in further appeal before us. The Ld. AR has pleaded for another opportunity to the assessee to substantiate the same which has been opposed by Ld. Sr. DR.

2. Though the assessee has remained negligent in substantiating the source of cash deposit, however, accepting the plea of Ld. AR and keeping in mind the principle of natural justice, we deem it fit to grant another opportunity to the assessee to substantiate its case before lower authorities. The same would be subject to payment of cost of Rs.5,000/- which shall be deposited by the assessee within 30 days from the date of receipt of this order to 'Tamil Nadu State Legal Services Authority' at Hon'ble High Court of Madras. The proof of the same shall be furnished by the assessee to learned AO who shall proceed for de novo assessment. The assessee is directed to substantiate its case forthwith.

3. The appeal stand allowed for statistical purposes.

*Order pronounced in open court on 09<sup>th</sup> December, 2024.*

**Sd/-**  
**(MANU KUMAR GIRI)**  
**न्यायिक सदस्य / JUDICIAL MEMBER**

**Sd/-**  
**(MANOJ KUMAR AGGARWAL)**  
**लेखक सदस्य / ACCOUNTANT MEMBER**

चेन्नई Chennai; दिनांक Dated : 09-12-2024  
DS

**आदेशकीप्रतिलिपिअग्रेषित/Copy of the Order forwarded to :**

1. अपीलार्थी/Appellant
2. प्रत्यर्थी/Respondent
3. आयकरआयुक्त/CIT Chennai
4. विभागीयप्रतिनिधि/DR
5. गार्डफाईल/GF