

**IN THE INCOME TAX APPELLATE TRIBUNAL  
DELHI BENCH 'SMC' NEW DELHI**

**BEFORE SHRI SATBEER SINGH GODARA, JUDICIAL MEMBER**

**ITA No. 3657/Del/2024**

**Assessment Year: 2016-17**

<b>Mahesh Kumar Hemrajani, Flat no. 07, LIG, Hjuelal Society, Pitampura Delhi-110034. PAN: AAIPK 2874 J</b>	<u>Vs</u>	Income-tax Officer, Ward-40(5), Delhi.
<b>APPELLANT</b>		<b>RESPONDENT</b>
<b>Assessee represented by</b>	<b>Shri Sumit Arora, Adv.</b>	
<b>Department represented by</b>	<b>Shri Siddharth B.S. Meena, Sr. DR</b>	
<b>Date of hearing</b>	<b>19.12.2024</b>	
<b>Date of pronouncement</b>	<b>19.12.2024</b>	

**ORDER**

**PER SATBEER SINGH GODARA, JM:**

This assessee's appeal for assessment year 2016-17 arises against National Faceless Appeal Centre (NFAC), Delhi's DIN and order no. ITBA/NFAC/S/250/2024-25/1065688241(1), dated 18.06.2024, in case no. CIT(A), Delhi-14/10270/2018-19, in proceedings u/s 143(3) of the Income-tax Act, 1961, hereinafter referred to as the 'Act'.

Heard both the parties at length. Case file perused.

2. It emerges during the course of hearing that both the lower authorities have made and sustained addition of Rs. 10,06,000/- representing the assessee's investment/ payments made to one Shri M/s Shri Parasram Commodity, as undisclosed income.

3. Learned counsel appearing for the assessee invites the tribunal's attention to pages 35 & 37 of the appeal file indicating it to have availed business loans of Rs. 7,30,000/- on 24.09.2016 followed by repayment of Rs. 7,03,000/- to foregoing entity(ies) by cheque(s) only. This is indeed coupled with the fact that keeping in mind the assessee's socio economic status, past savings, cash withdrawals etc. also could not be altogether be ruled out. Faced with this situation I deem it appropriate in the larger interest of justice to delete the impugned addition of Rs. 10,06,000/- to the extent of Rs. 9.06 lakhs and affirm the remaining sum of Rs. 1 lakh. Necessary computation shall follow as per law. The assessee gets relief of Rs. 9.06 lakhs in other words.

4. This assessee's appeal is partly allowed.

Order pronounced in open court on 19.12.2024.

**Sd/-**  
**(SATBEER SINGH GODARA)**  
**JUDICIAL MEMBER**

\*MP\*

Copy forwarded to:

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

ASSISTANT REGISTRAR  
ITAT, NEW DELHI