

आयकर अपीलीय अधिकरण, 'सी' न्यायपीठ, चेन्नई
IN THE INCOME TAX APPELLATE TRIBUNAL
'C' BENCH, CHENNAI

श्री एबी टी वर्की, न्यायिक सदस्य एवं श्री एस. आर. रघुनाथा, लेखा सदस्य के समक्ष
BEFORE SHRI ABY T VARKEY, HON'BLE JUDICIAL MEMBER AND
SHRI S. R. RAGHUNATHA, HON'BLE ACCOUNTANT MEMBER

आयकर अपील सं./ITA No.: 10/Chny/2023

निर्धारण वर्ष / Assessment Year: 2017-18

**Deputy Commissioner of
Income Tax,**
Corporate Circle-1, Aayakar
Bhavan,
63, Race Course Road,
Coimbatore – 641 018.

(अपीलार्थी/Appellant)

अपीलार्थी की ओर से/Appellant by

प्रत्यर्थी की ओर से/Respondent by

M/s. RKR Gold Pvt Ltd.,

v. No. 169, T.V. Samy Road West,
R.S. Puram, Coimbatore South,
Coimbatore – 641 002.

[PAN: AADCR-4414-M]

(प्रत्यर्थी/Respondent)

: Shri.R.Clement Ramesh, CIT

: Shri.N.Arjun Raj, Advocate &
Shri Girish Kumar, Advocate

सुनवाई की तारीख/Date of Hearing : 19.02.2025

घोषणा की तारीख/Date of Pronouncement : 24.02.2025

आदेश / O R D E R

PER S. R. RAGHUNATHA, ACCOUNTANT MEMBER:

This appeal by the revenue is filed against the order of the Commissioner of Income Tax (Appeals), National Faceless Appeal Centre (NFAC), Delhi, for the assessment year 2017-18, dated 17.11.2022.

2. The revenue has raised the following grounds of appeal:

1. *The order of Ld. CIT(A) is against the facts and circumstances of the case.*

2. The Ld. CIT(A) failed to appreciate the fact that the assessee company does not have a retail outlet and is only a manufacturer of jewellery that sells jewellery to retail jewelers and the fact that they have made unusually large numbers of sales on the period from 01.11.2016 to 08.11.2016 defies logic.

3. The Ld. CIT(A) failed to appreciate the fact that the claimed no. of cash sales transactions of the assessee on 06.11.2016 is 471. Even with the assumptions that no other transactions were performed on that day, and that the assessee company worked round the clock, it still boils down to around 20 transactions in cash sales per hour on that day which is impracticable.

4. The Ld. CIT(A) failed to appreciate the fact that the business of assessee is a going concern. In contrast to all precedents in its business, the assessee claims to have effected cash sales of Rs.16,77,06,483/- in the 8 days of November 2016 immediately preceding demonetization.

5. The Ld. CIT(A) failed to observe the fact that all of the claimed cash sales of jewellery had been made from 01.11.2016 to 08.11.2016. No cash sales were made prior to 01.11.2016 and a few cash sales were made during the demonetization period and none after that.

6. The Ld. CIT(A) failed to appreciate that every documents, relied on by the assessee to claim that the cash credited in books is out of sales, can be prepared as an afterthought to accommodate the cash deposits by modifying the books of accounts and making statutory filings.

7. The Ld. CIT(A) failed to appreciate the fact that all the cash sales made were recorded as transactions below Rs.2,00,000/- in order to bypass the provisions of Rule 114(E)(2) r.w. sl. No. 18 of Rule 114B of the Income Tax Rules, 1962. This relieved the assessee of the obligation of ensuring PAN of the purchaser while raising bills.

8. The Ld. CIT(A) failed to appreciate the fact that, by delaying filing of audit report and ROI, the assessee company bought itself sufficient time to tamper with its books of account to accommodate the cash sales.

9. The Ld. CIT(A) failed to appreciate the fact that all the details required to be filed u/s 142(1) were not filed by the

assessee within the time stipulated, thereby denying the AO the opportunity to make proper investigation.

10. The Ld. CIT(A) failed to appreciate the fact that the assessee failed to submit even basic evidence like name and address of parties to whom cash sales are claimed to be made and hence AO has rightly treated the cash credits in books of accounts as unexplained credits and added to income of assessee for the relevant assessment year.

11. For these and any other grounds that may be adduced at the time of hearing, the order of the CIT(A) may be quashed and that of the AO restored.

In brief the sole ground before us raised by the revenue is the Id.CIT(A) has erred in deleting the addition of Rs.16,64,18,000/- u/s.69A r.w.s. 115BBE of the Income-tax Act, 1961 (hereinafter referred to as "the Act").

3. The brief facts are that the assessee M/s.RKR Gold pvt. ltd. is a company deriving income from business of manufacture and trading of Gold jewellery. The assessee filed its return of income for the assessment year 2017-18 on 31.01.2018, admitting an income of Rs.1,17,00,790/-. The case was selected for scrutiny under CASS. Accordingly, notices u/s.143(2) and 142(1) of the Act were issued to the assessee calling for details of cash deposits of Rs.16,64,18,000/- made during demonetization period into various bank accounts in the form of Specified Bank Notes. In response to notices, the assessee filed the replies / details through e-proceedings.

During the assessment proceedings in support of the demonetization deposits the assessee submitted the sales ledger, cash book, stock and VAT returns along with detailed statement of month wise cash deposits made to the bank account and corresponding cash sales. However, the Id.AO was not satisfied with the explanation furnished by the assessee, since the assessee had not deposited entire amount of Rs.16.64 crores immediately on announcement of demonetisation instead the same had been deposited to bank from 09.12.2016 to 30.12.2016. Further, the AO stated that the assessee had not made any cash sales of jewellery prior to 01.11.2016 and the entire amount cash deposit of Rs.16.64 crores in SBNs made during demonetisation period was out of cash sales only from 01.11.2016 to 08.11.2016. The AO also stated that the assessee does not have retail outlet and is only manufacturer of jewellery to sell the same to retail jewellers and hence made an addition of total cash deposits of Rs.16,64,18,000/- to income as unexplained money u/s.69A r.w.s. 115BBE of the Act and completed the assessment u/s. 143(3) of the Act on 23.12.2019 by holding as under:

"2.6 As laid down in CIT v Durga Prasad More [(1971)] 82 ITR 540], the apparent must be considered as real until it is shown that there are reasons to believe that the apparent is not the real and the tax authorities are entitled to look at the

surrounding circumstances to find out the realities and the matter has to be considered by applying the test of human probabilities. Considering all the facts detailed above, it is opined that the cash sales entered in the cash book was bogus. Cash was introduced into the books in the form of cash sales, supported by sales voucher and declared in the VAT return. The cash sales were created fictitiously by the assessee company, merely to build an explanation for the cash deposits in to the bank accounts.

2.7 Section 68 of the IT Act is for taxing the unexplained credits, where any sum is found credited in the books of an assessee maintained for any previous year, and the assessee offers not explanation about the nature and source thereof or the explanation offered by him is not, in the opinion of the Assessing Officer, satisfactory, the sum so credited may be charged to income- tax as the income of the assessee of that previous year. Since the credits are bogus and fictitious, the money deposited is not brought to tax u/s 68 of the IT Act.

2.8 However, money was deposited into the bank account of the assessee company and therefore was the owner of the money. Under section 69A of the IT Act 1961, where in any financial year the assessee is found to be the owner of any money, bullion, jewelry or other valuable article and such money, bullion, jewelry or valuable article is not recorded in {the books of account, if any, maintained by him for any source of income, and the assessee offers no explanation about the nature and source of acquisition of the money, bullion, jewelery or other valuable article, or the explanation offered by him is not, in the opinion of the Assessing Officer, satisfactory, the money and the value of the bullion, jewelry or other valuable article may be deemed to be the income of the assessee for such financial year.

2.9 It is also brought on record that the Department need not locate source of receipt Where the assessee has failed to prove satisfactorily the source and nature of a credit entry in his books, and it is held that the relevant amount is the income of the assessee, it is not necessary for the department to locate its exact source as held in CIT v. M.Ganapathi Mudaliar [1964] 53 ITR 623 (SC)/A Govindarajulu Mudaliar v. CIT [1958] 34 ITR 807 (SC). 2.10. In the circumstances, the cash deposit of amounting to Rs. 16,64,18,000/- in SBN's explained from fictitious sales of Rs. 16,77,06,483/- is brought to tax as unexplained money u/s.69A and charged to tax u/s 115BBE of

the IT Act 1961. Penalty proceedings u/s 271AAC is initiated separately.

3.0 Since the cash sales amounting to Rs. 16,77,06,483/- is bogus and fictitious, the Gross Profit admitted in the return of income for the year towards these fictitious sale is reduced. The G.P % admitted during the year is Rs.5.47% and Gross Profit admitted on the fictitious sale is 91,73,544/-.

4.0 Total Assessed Income is computed as under:

Particulars	Amount in Rs.
<i>Returned Income</i>	<i>1,17,00,790</i>
<i>Less: GP Reduced on fictitious sales as discussed in para 3.0 above</i>	<i>91,73,544</i>
	<i>25,27,246</i>
<i>Add: Addition u/s. 69A as discussed in Para 2 above</i>	<i>16,64,18,000</i>
	<i>16,89,45,246</i>
Assessed Income	16,89,45,250

4. Aggrieved by the assessment order of the AO, the assessee preferred an appeal before the Id.CIT(A).

5. Before the Id.CIT(A), the assessee reiterated that it was carrying on the business of manufacturing and trading in Gold jewellery and assessed to TNVAT Act. The assessee maintained regular books of accounts along with stock inventory. The assessee stated that they had furnished the cash book for the entire year, month wise purchases and sales for the entire year, sales register for the entire year, inventory register for the entire year, monthly VAT returns filed with TNVAT Department and demonstrated that the cash was deposited in SBN was out

of sales proceeds of stock on hand. However, the AO completely ignored the submissions. The assessee submitted that the AO had commenced the assessment with preconceived notion without considering the reply/submissions filed and straightaway relying on the Hon'ble Supreme Court in the case of Durga Prasad More, which deals with the theory of human probabilities particularly when self-serving statements in a document are relied upon. Since the case law is not applicable to the present case as the AO has not found any discrepancy in any of the documents available before him. The AO has not discharged his primary responsibility of dis-proving the documents submitted and therefore the addition made is preposterously liable to be set aside.

In support of the claim, the assessee relied on the following judgments:

- Smt. Charu Aggarwal Vs.DCIT (2022) 140 taxmann.com 588 (Chandigarh Trib)
- CIT Vs.Smt. P K Noorjhan 103 Taxmann 382 (SC) (1999) 237 ITR 570 (SC)
- ACIT Vs. Hirapanna Jewellers - ITA No.253/Viz/2020, ITAT Vishakapatnam – 189 ITD 608 (2021)
- B.Krishan Kumar Vs.ITO [2019] 107 taxmann.com 464 (SC)

and pleaded to delete the addition made by the AO.

5.1 The Id.CIT(A), after considering the submissions made and case laws relied upon by the assessee, held that the assessee's submissions with regard to cash deposits during demonetization period is supported with documents and evidence and the case laws relied upon by the assessee are applicable to the facts of the present case. Accordingly, the Id.CIT(A) deleted the additions made by the Id.AO u/s.69A r.w.s. 115BBE of the Act by holding as under:

In the present case, the appellant has produced all relevant documents which could not be controverted by the AO. The documents included purchase details sales ledger cash book etc. These are sufficient to prove the genuineness of the purchases and also the cash sales which the AO has refused to accept. As per the above case law, to make additions/disallowances even of figures apparent during the demonetization period the Revenue needs to bring cogent evidences.

5.9.1. *The above extensive discussion made in earlier paragraphs has perused each and every aspect of the allegations made by the AO in his assessment order dated 23.12.2019. The undersigned has also minutely studied the explanation given by the appellant. Both these sides were tested on the mantle of the provisions of the Income Tax Act 1961 as well as the various case laws judgments delivered by the Honourable Supreme Court some of them emanating from the Madras High Court. In the totality of the case and after perusal of allegations and counter explanation the undersigned has come to the conclusion that the additions made u/s 69A of the I T Act at Rs.16,64,18,000/- is unsustainable under the Income Tax Act 1961. **Hence the appeal raised by the appellant is allowed.***

Aggrieved by the impugned order of the Id.CIT(A), the Revenue preferred an appeal before us.

6. The Ld.DR, assailed that the Id.CIT(A) has erred in deleting the addition made u/s.69A r.w.s. 115BBE of the Act, even though the assessee has failed to substantiate the sales made from 01.11.2016 to 08.11.2016 without having proper infrastructure to make a retail sales. Further, the Id.DR challenged the factual finding of the Id.CIT(A) that AO has noticed only the suspicious features of the transactions.

6.1 Further, the Id.DR argued that the Id.CIT(A) has erred by ignoring the availability of infrastructure and practicality of as to how the assessee company has suddenly carried out retail sales; how in no time customers rush to his showroom without even ready with adequate chairs and tables to handle retail customers. The Id.DR also raised a point that the Id.CIT(A) to appreciate that recording of transactions below Rs.2.00 Lakhs in order to by pass the provisions of Rule 114C(2) r.w. Sl.No.18 of Rule 114B of the Income Tax Rules, 1962. From the table 1 & 2 in page No.5 of the Assessment order, it is found that the assessee company never had any cash sales from April 2015 to March 2017, only the sale of jewellery to the public except for 8 days in the month of November 2016. During these 8 days, the

assessee company has reported cash sales of around 16.77 crores which is very unusual and abnormal.

6.2 The Id.DR also relied on the decision of CIT Vs.Durga Prasad More – [1971] 82 ITR 540(SC) and Calcutta Discount Co.Ltd Vs. ITO (1961) – 41 ITR 191 (SC) in support of human probability and cash sales made by the assessee and prayed for dismissing order of the Ld.CIT(A).

7. Per contra, the Id.AR for the assessee supported the action of the Id.CIT(A) and stated that the Id.CIT(A) is justified in deleting the addition made by the AO, since the assessee has maintained proper books of accounts like Cash book, bank book, sales register, purchase register, stock registers, monthly VAT returns, Audit report in Form 3CA and 3CD, Audited financials have been furnished during the assessment as well as appellate proceedings. The Assessee also furnished the month wise cash sales and cash deposit for the impugned year (A.Y. 2017-18) along with the prior assessment year 2016-17 (with a break up from 01.11.2016 to 08.11.2016 and 9.11.2016 to 30.11.2016), entire cash sales details from 01.11.2016 to 08.11.2016 apart from day wise summary for the same period.

The AO has also observed that the each sales invoices are for value less than Rs.2.00 Lakhs per person and which is in accordance with the Rule 114C(2) read with sl. No.18 of Rule 114B of the IT rules 1962. The assessment was concluded by the Assessing Officer without finding any defect in the books of accounts furnished and also the same has been accepted.

7.1 The Id.AR also stated that the following documents were produced before the AO and that of Id.CIT(A) in support of the genuineness of the transactions carried out during the A.Y. 2017-18 including the demonetisation period in paper book Volume -I consisting of 1 to 67 pages:

S. No	Date	Particulars	Page No.
1	27.08.2018	Notice issued u/s 143(2) of the Act	01
2	19.08.2019	Notice issued u/s 142(1) of the Act	05
3	19.10.2019	Screenshots of replies filed by the respondent in response to notice issued u/s 142(1) of the Act	07
4	29.10.2019	Notice issued u/s 142(1) of the Act	08
5	07.12.2019	Screenshots of replies filed by the respondent in response to notice issued u/s 142(1) of the Act	17
6	11.11.2019	Letter issued by the Assessing officer	19
9	14.11.2019	Screenshots of replies filed by the respondent	20
10	15.11.2019	Notice issued u/s 142(1) of the Act	22
11	20.11.2019	Screenshots of replies filed by the respondent	24
12	12.12.2019	Notice issued u/s 142(1) of the Act	26
13	17.12.2019	Screenshots of replies filed by the respondent	28
14	16.12.2019	Showcause notice issued to the respondent	33
15	18.12.2019	Response to Show cause notice submitted by the Respondent	35
16	24.02.2021	Hearing notice u/s 250 of the Act issued to	38

		<i>the Respondent</i>	
17	11.03.2021	<i>Written submission filed by the Respondent</i>	42
18	11.03.2021	<i>Screenshot of response filed by the Respondent</i>	47
19	08.06.2022	<i>Hearing notice u/s 250 of the Act issued to the Respondent</i>	48
20	17.06.2022	<i>Screenshot of response filed by the Respondent</i>	52
21	24.08.2022	<i>Hearing notice u/s 250 of the Act issued to the Respondent</i>	54
22	20.10.2022	<i>Hearing notice u/s 250 of the Act issued to the Respondent</i>	58
23	26.10.2022 30.10.2022 04.11.2022 16.11.2022	<i>Screenshot of response filed by the Respondent</i>	62

7.2 In this paper book the Id.AR drew our attention to particularly the documents submitted before the AO as well as the Id.CIT(A), the assessee's bank accounts and the statement/ledgers thereon along with the Cash book, sales ledger, VAT returns, Purchase ledger, Stock registers, Purchase returns, Annual audit report under TNVAT Act, Sales Invoices for the A.Y. 2017-18. The AO has verified all the documents and has not rejected the books of accounts filed along with tax audit report of the assessee and not doubted the stock and purchases but with the assumption of impracticability of sales made on a particular days i.e. 01.11.2016 to 08.11.2016 as unexplained and brought to tax, which is against provisions of the Act.

7.3 Further, the assessee also filed a paper book volume III consisting of the return of income (Page Nos.1 to 2), Audit

report in Form 3CA & 3CD (Page Nos.3 to 16) and Form 29B (Page Nos.17 to 21) and Annual report for the F.Y. 2016-17 (Page Nos.22 to 56) having details sales made of products and services, opening & closing stock of raw materials. In light of the above documents and submissions, the action of the Id.CIT(A) cannot be interfered and prayed for dismissing the appeal of the revenue.

7.4 Further, the Id.AR also brought to our attention to 'The specified Bank Notes (Cessation of Liabilities) Act, 2017,' wherein the 'Appointed day' means 31st Day of December, 2016 for cessation of the SBNs. The Ld.AR took us through following judicial decisions relied in support of the Id.CIT(A) order, (paper book volume II - page nos.01 to 182) and prayed for considering the same and dismiss the appeal of the revenue.

- (i) ITO, Coimbatore vs Sahana Jewellery Exports Pvt Ltd. Chennai ITAT – ITA No.999/2022
- (ii) DCIT vs M/s.DAR Paradise Pvt. Ltd. Chennai ITAT – ITA No.1106/2023
- (iii) JCIT Vs. Tara Jewellery - Chennai ITAT – ITA No.276/2023
- (iv) ITO vs Surabi Gold – Chennai ITAT – ITA No.372/2023
- (vi) DCIT vs D Gem Mount – Chennai ITAT – ITA No.782/2023
- (vii) DCIT vs ANS Jewellery – Chennai ITAT – ITA No.1151/2023

(viii) Sonny Fireworks Pvt Ltd vs DCIT – Chennai ITAT –
ITA No.1081/2024

8. We have heard both the parties, perused materials available on record, all the paper books and gone through orders of the authorities below. The fact with regard to the impugned dispute are that the assessee has deposited a sum in specified bank notes during demonetization period to the bank account. It is admitted from the records that the assessee is engaged in manufacturing and trading business of gold jewellery. The case was selected for scrutiny to verify the source for cash deposited and called for certain details. The assessee deposited cash of Rs.16,64,18,000/-, after announcement of demonetization by Government of India on 08.11.2016. The assessee deposited cash out of sale proceeds of gold and diamond jewellery collected from its customers which was less than Rs.2.00 lakhs per person and there was no requirement on the part of the assessee to obtain details like name, address and PAN of the buyers. In response to notice u/s.142(1) of the Act, the assessee had furnished cash book, sales register, purchase register, bank statements along with stock registers for the relevant period. The stock moved out of the books on account of sales made by the assessee has

established from stock registers. The VAT returns and annual audit report under TNVAT Act for the relevant period reflected such sales which have been accepted by the VAT authorities. The assessee has maintained proper books of accounts which are subjected to tax audit u/s. 44AB of the Act. The assessee also submitted the month wise abstract of purchases, sales, invoice wise details from 01.11.2016 to 08.11.2016, cash deposited in the impugned year along with prior F.Y. 2015-16, the details of cash deposited from 01.11.2016 to 08.11.2016 and from 09.11.2016 to 30.11.2016. These books of accounts, statements and other documents furnished by the assessee before the lower authorities, which have not been disputed nor rejected. The books of accounts of the assessee have been accepted by the lower authorities while framing the assessment and not rejected by pointing out any defects.

8.1 On perusal of the records and facts and circumstances of the case, we are of the considered opinion that when the sale has been reflected in the books of accounts and offered to tax, adding the same again would amount to double taxation, which is impermissible in law. The cash sales made by the assessee have been credited in the books of accounts and the

same form part of the assessee's cash book. On these facts, it could be very well said that the assessee's claim was backed up by relevant evidences. Thus, the assessee has discharged the burden of proving the source of the cash/SBN deposited in the bank and the Assessing Officer failed to rebut the same. The allegations/statistics of entire sales made from 01.11.2016 to 08.11.2016 by accepting the SBNs to the tune of Rs.16,64,18,000/-, relied upon by the Assessing Officer to take an adverse view is not backed up by relevant evidence/material and therefore the action of AO, which has been rightly set aside by the Id.CIT(A) and hence cannot be interfered. The finding of the AO that such abnormal sales could not be achieved before the announcement of demonetization by the Government, is bereft of any concrete evidence to prove otherwise on record. Further, the reliance on the decision of the Hon'ble supreme court in the case of Durga Prasad More, is not applicable to the present facts of the case, as the assessee has furnished the documents and records which are submitted to the statutory authority like TNVAT department and discharged the taxes on monthly basis, apart from the books of accounts audited by a Chartered accountant. It is trite law that no addition could be made merely on the

basis of suspicion, conjectures and surmises. Moreover, since cash generated out of sales has been credited in the books of accounts, the provisions of section 69A could not be invoked in the present case. The assessee's reliance on the coordinate bench decision in the following cases which are identical to the present facts are taken into consideration:

- (i) ITO, Coimbatore vs Sahana Jewellery Exports Pvt Ltd. Chennai ITAT – ITA No.999/2022
- (ii) DCIT vs M/s.DAR Paradise Pvt. Ltd. Chennai ITAT – ITA No.1106/2023
- (iii) JCIT Vs. Tara Jewellery - Chennai ITAT – ITA No.276/2023
- (iv) ITO vs Surabi Gold – Chennai ITAT – ITA No.372/2023
- (vi) DCIT vs D Gem Mount – Chennai ITAT – ITA No.782/2023
- (vii) DCIT vs ANS Jewellery – Chennai ITAT – ITA No.1151/2023
- (viii) Sonny Fireworks Pvt Ltd vs DCIT – Chennai ITAT – ITA No.1081/2024

8.2 Further, the coordinate bench decision in the case of Smt. Durga Devi Mundhra vs. ITO in ITA No.1228/Chny/2023, dated 25.04.2024 is applicable to the present case on hand, wherein the Tribunal held as under:

"6. We are of the considered opinion that when the sale has been reflected in the books of accounts and offered to tax, adding the same again would amount to double taxation which is impermissible in law. The cash sales proceeds have been credited in the books of accounts and the same form part of assessee's cash book. On these facts, it could very well be said that the assessee's claim was backed up by sufficient documentary evidences. The allegation of Ld. AO is that such abnormal sales could not be achieved by the assessee

immediately upon announcement of demonetization by the Government. However, such allegations are bereft of any concrete evidence on record. It is trite law that no addition could be made merely on the basis of suspicion, conjectures and surmises. In the present case, the assessee has duly discharged the burden of establishing the source of cash deposit and the onus was on Ld. AO to disprove the same. However, except for mere allegation and few statistics, there is nothing on record to support the conclusions drawn by Ld. AO that the cash deposited by the assessee was her unaccounted money. There is no finding by Ld. AO that any particular sales affected by the assessee exceeded threshold limit which cast an additional obligation on the assessee to obtain requisite particulars from the customers. Since cash generated out of sales has been credited in the books of accounts, the provisions of Sec.69A could not be invoked in the present case. Therefore, on the given facts, the impugned additions are not sustainable. By deleting the same, we allow corresponding grounds raised by the assessee."

9. Therefore, on the given facts and circumstances, the impugned additions are not sustainable in the eyes of law and hence, we are of the considered view that the action of the Id.CIT(A) in deleting the addition need not be interfered and hence we dismiss the grounds raised by the Revenue.

10. In the result, appeal filed by the Revenue is dismissed.

Order pronounced in the open court on 24th February, 2025 at Chennai.

Sd/-
(एबी टी वर्की)
(ABY T VARKEY)
न्यायिक सदस्य/Judicial Member

Sd/-
(एस. आर. रघुनाथा)
(S. R. RAGHUNATHA)
लेखासदस्य/Accountant Member

चेन्नई/Chennai,

दिनांक/Dated, the 24th February, 2025

JPV

आदेश की प्रतिलिपि अग्रेषित/Copy to:

1. अपीलार्थी/Appellant
2. प्रत्यर्थी/Respondent
3. आयकर आयुक्त/CIT – Coimbatore
4. विभागीय प्रतिनिधि/DR
5. गार्ड फाईल/GF