



IN THE INCOME TAX APPELLATE TRIBUNAL
PUNE BENCHES "SMC", PUNE

BEFORE DR.MANISH BORAD, ACCOUNTANT MEMBER
AND
SHRI S.S. VISWANETHRA RAVI, JUDICIAL MEMBER

आयकर अपील सं. / ITA No.334/PUN/2025
Assessment Year : 2018-19

Central Bank of India Employees Co-op. Credit Society Ltd., Laxmipuri Branch, Ford Corner, Kolhapur-416002 PAN : AABAC1552F	Vs.	ITO, Ward-1(1), Kolhapur
Appellant		Respondent

Appellant by	:	None
Revenue by	:	Shri Basavaraj Hiremath
Date of hearing	:	24.03.2025
Date of pronouncement	:	28.03.2025

आदेश / ORDER

PER DR. MANISH BORAD, AM :

This appeal at the instance of assessee is directed against the order of the Ld. CIT(A)/National Faceless Appeal Centre, Delhi dated 25.03.2024 which is arising out the order u/s. 143(3) of the Act for Assessment Year 2017-18 framed by ITO, Ward-1(1), Kolhapur.

2. When the appeal was called for, none appeared on behalf of the assessee even though proper notice of hearing was issued and served. However, with the assistance of Ld. Departmental Representative, we notice that the impugned order is *ex-parte* as the assessee failed to attend the hearing and did not file any submissions/documents.



3. We have heard the Ld. DR and perused the record placed before us. The assessee is a Co-operative Society and no return of income was filed for AY 2018-19. Subsequently, the case of the assessee was reopened u/s. 147 of the Act and the assessment was completed on 13.03.2023 after making an addition of Rs.1,63,447/-. The assessee failed to succeed before the Ld. CIT(A) as it failed to respond to the notices and the addition made by the Ld. Assessing Officer was confirmed. Considering the facts and circumstances of the case and the claim of the assessee that it is entitled to deduction u/s. 80P(2)(a)(i)/80P(2)(d) of the Act for the interest income earned on fixed deposits kept with the Co-operative Banks. In view thereof, without dwelling into merits of the issues considering the grounds of appeal raised by the assessee and in the larger interest of justice and being fair of both the parties, we remit the issue raised on merits in the instant case to the file of the Ld. CIT(A)/NFAC for necessary adjudication, in accordance with law. Needless to mention that proper opportunity of hearing shall be granted to the assessee. The assessee is directed to remain vigilant and not to take adjournment unless otherwise required for reasonable cause. Effective grounds of appeal raised by the assessee are allowed for statistical purposes.

7. In the result, the appeal of the assessee is allowed for statistical purposes.

Order pronounced on this 28th day of March, 2025.

Sd/-
(S.S. VISWANETHRA RAVI)
JUDICIAL MEMBER

Sd/-
(MANISH BORAD)
ACCOUNTANT MEMBER

पुणे / Pune; दिनांक / Dated : 28th March, 2025.

RK

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

1. अपीलार्थी / The Appellant.
2. प्रत्यर्थी / The Respondent.
3. The Pr. CIT concerned.
4. विभागीय प्रतिनिधि, आयकर अपीलीय अधिकरण, "SMC" बेंच,
पुणे / DR, ITAT, "SMC" Bench, Pune.
5. गार्ड फ़ाइल / Guard File.

आदेशानुसार / BY ORDER,

// True Copy //

Senior Private Secretary
आयकर अपीलीय अधिकरण, पुणे / ITAT, Pune.