



**IN THE INCOME TAX APPELLATE TRIBUNAL,
RANCHI BENCH, RANCHI**

**BEFORES/SHRI GEORGE MATHAN, JUDICIAL MEMBER
AND RATNESH NANDAN SAHAY, ACCOUNTANT MEMBER**

ITA No.146/RAN/2019

Assessment Year: 2015-16

Dy.CIT, Circle-1, Ranchi	Vs.	M/s. Urmila RCP Project Pvt Ltd., 1 RCP Complex, Kadru, Ranchi-834002
PAN/GIR No.AACCR 5201 P		
(Appellant)	..	(Respondent)

ITA No.54/RAN/2019

Assessment Year: 2015-16

M/s. Urmila RCP Project Pvt Ltd., 1 RCP Complex, Kadru, Ranchi-834002	Vs.	Dy.CIT, Circle-1, Ranchi
PAN/GIR No.AACCR 5201 P		
(Appellant)	..	(Respondent)

Assessee by : Shri Manjit Verma, CA
Revenue by :Smt. Rinku Singh, CIT DR

Date of Hearing : 09/06/2025
Date of Pronouncement : 09/06/2025

ORDER

Per Bench

ITA No.146/Ran/2019 is an appeal filed by the revenue and ITA No.54/Ran/019 is an appeal filed by the assessee against the order of the Id CIT(A), Ranchi dated 31.1.2019 in Appeal No.CIT(A),Ranchi/10260/2017-18 for the assessment year 2015-16.

2. Smt. Rinku Singh, Id CIT DR appeared for the revenue and Shri Manjji Verma, Id AR appeared for the assessee.

3. It was submitted by Id CIT DR that in the course of assessment, the Assessing Officer had disallowed certain expenses as inadmissible expenses by holding the same as contingent liabilities. The break-up of the expenses is found at pages 5-6 of the assessment order in para 3. The reasons for the disallowance have been brought out by the Assessing Officer in para 3.1 and 3.2 of the assessment order. It was the submission that none of the bills to prove the expenses had been produced before the Assessing Officer. It was the further submission that before the Id CIT(A), the assessee had provided a chart which was shown at page 19 of the order of the Id CIT(A), wherein, various details and some chart had been produced. It was the submission that the on the basis of the chart and submission of the assessee, the Id CIT(A) has in para 5.4 of his order at page 26, deleted the addition to an extent of Rs.4,16,26,731/- and has confirmed the disallowance to an extent of Rs.56,18,171/-. In regard to part of the expenses disallowed to an extent of Rs.4,16,26,731/-, the revenue is in

appeal in ITA No.146/Ran/2019 and in regard to the confirmation of disallowance of the expenses to an extent of Rs.56,18,971/-, the assessee is in appeal.

4. It was the submission that no details having been produced before the Assessing Officer, the deletion of the disallowance by the Id CIT(A) was not permissible. It was the further submission that the revenue has no objection, if the issues in this appeal are restored to the file of the Assessing Officer for examination of the expenses subject to the assessee providing the details of expenses of the expenses having been incurred.

5. When the Id AR was asked to produce the details of the bills of expenses having been incurred, Id AR replied that he is not in a position to immediately provide the same. It was the submission that he is willing to produce the same before the Assessing Officer.

6. We have considered the rival submissions. As it is noticed from the assessment order that the assessee has not provided any of the bills in respect of the said expenses before the Assessing Officer and has produced the evidence before the Id CIT(A), in the interest of justice, the issues in both the appeals are restored to the file of the Assessing Officer so that the assessee can produce the bills of the expenses and the Assessing Officer shall examine the same. Should the assessee not able to produce such bills/details of expenses, the expenses shall not be allowed . The Assessing Officer also shall keep in mind that the assessee is following mercantile system of accounting.

7. In the result, appeal of the revenue and appeal of the assessee stand partly allowed for statistical purposes.

Order dictated and pronounced in the open court on 9/06/2025.

Sd/-
(RATNESH NANDAN SAHAY)
ACCOUNTANT MEMBER

Sd/-
(GEORGE MATHAN)
JUDICIAL MEMBER

Ranchi; Dated 09/06/2025
B.K.Parida, SPS (OS)

Copy of the Order forwarded to :

1. The Appellant /Revenue; Dy.CIT, Circle-1, Ranchi
2. The Respondent/Assessee; M/s. Urmila RCP Project Pvt Ltd., 1 RCP Complex, Kadru, Ranchi-834002
3. The CIT(A)-Ranchi
4. Pr.CIT,Ranchi
5. DR, ITAT,
6. Guard file.
//True Copy//

By order

Sr.Pvt.secretary
ITAT, Ranchi