

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

माननीय श्री मनु कुमार गिरि ,न्यायिक सदस्य एवं माननीय श्री अमिताभ शुक्ला, लेखा सदस्य के समक्ष
BEFORE HON'BLE SHRI MANU KUMAR GIRI, JUDICIAL MEMBER AND
HON'BLE SHRI AMITABH SHUKLA, ACCOUNTANT MEMBER

आयकर अपील सं./ITA No.1097/Chny/2025
Assessment Years: 2014-15

Ms.Ranjana Rungta,
No.127A, TVH Lumbini Square 3071,
Bricklim Road,
Vepery,
Chennai-600 007.
[PAN: AGBPR0526M]

Income Tax Officer,
Non-Corp Ward-9(1),
Chennai.

(अपीलार्थी/Appellant)

(प्रत्यर्थी/Respondent)

अपीलार्थी की ओर से/ Assessee by
प्रत्यर्थी की ओर से /Revenue by

: Mr.R.Vijayaraghavan, Advocate (Virtual)
: Ms.Anitha, Addl.CIT

सुनवाई की तारीख/Date of Hearing : 17.06.2025
घोषणा की तारीख /Date of Pronouncement : 19.06.2025

आदेश / O R D E R

PER AMITABH SHUKLA, A.M :

This appeal is filed by the assessee against the order bearing DIN & Order No.ITBA / NFAC / S / 250 / 2024-25 / 1073564311(1) dated 21.02.2025 of the Learned Commissioner of Income Tax [herein after "CIT(A), National Faceless Appeal Center[NFAC], Delhi, for the assessment year 2014-15. The reference to the word "Act" in this order hereinafter shall mean the Income Tax Act, 1961 as amended from time to time.

2.0 At the outset, the Ld.Counsel for the assessee submitted that the only issue raised by it through grounds of appeal qua addition of Rs.62,55,000/- u/s 68 made by the Ld.AO is that no addition was liable to be made in its case since the impugned transactions were already offered for taxation by the assessee within the meanings of income declaration scheme 2016. The Ld.Counsel for the assessee submitted that as a sequel to its application PCIT-8, Chennai had accepted its declaration and issued Form-4 dated 11.01.2018. The said matter was brought to the knowledge of the Ld.CIT(A) through the ground of appeal no.2, 3 & 4 but the same was ignored and addition confirmed by him.

3.0 Per contra, the Ld.DR relied upon the order of lower authorities.

4.0 We have heard rival submissions in the light of material available on records. We have perused the documents produced by the appellant assessee indicating prima facie veracity of its contentions. We have also noted that the Ld.CIT(A) has brushed aside the arguments without any comment. The only issue is that when the assessee has already made a declaration qua income declaration scheme 2016 and the Ld.PCIT-8, Chennai had accepted its declaration and issued Form-4 dated 11.01.2018 same income cannot be taxed again in the terms of the immunity available to the appellant w.r.t. Circular No.24 of 2016 dated 27.06.2016 issued by the CBDT. Accordingly, in the interest of justice, we remit the case to the file of the Ld.AO for limited verification of the

facts qua declaration made by the assessee under the income declaration scheme 2016 in the light of Form-4 dated 11.01.2018 issued by the Ld.PCIT-8, Chennai. In case the assessee has made the impugned declaration qua transactions material to addition made by the Ld.AO and the same has been accepted by the Revenue through Form-4 dated 27.06.2016, the addition would stand deleted. Accordingly, all the grounds of appeal raised by the assessee are allowed for statistical purposes.

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

Order pronounced on 19th , June-2025 at Chennai.

Sd/-

(मनु कुमार गिरि)

(MANU KUMAR GIRI)

न्यायिक सदस्य / Judicial Member

चेन्नई/Chennai, दिनांक/Dated:

KB/-

Sd/-

(अमिताभ शुक्ला)

(AMITABH SHUKLA)

लेखा सदस्य /Accountant Member

, June-2025.

आदेश की प्रतिलिपि अग्रेषित/Copy to:

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