



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

**BEFORE S/HRI GEORGE MATHAN, JUDICIAL MEMBER AND
RATNESH NANDAN SAHAY, ACCOUNTANT MEMBER**

ITA No.63/RAN/2024

Assessment Year : 2017-18

Sunila Jha, Qr. No.591, Sector-IC, B.S.City, Bokaro- 827001	Vs.	Income Tax Officer, Ward - 3, (4), Bokaro
PAN/GIR No.AZOPJ 0891 K		
(Appellant)	..	(Respondent)

Assessee by : Shri M.K. Choudhary, Adv
Revenue by : Shri Khubchand T Pandya, Id Sr DR

Date of Hearing : 20/08/2025
Date of Pronouncement : 20/08/2025

ORDER

Per Bench

This is an appeal filed by the assessee against the order of the Id CIT(A), NFAC, Delhi dated 21.2.2024 in Appeal No.CIT(A), Hazaribag/10199/2019-20 for the assessment year 2017-18.

2. Shri M.K.Choudhury, Id AR appeared for the assessee. Shri Khubchand T Pandya, Id Sr DR represented on behalf of the revenue.

3. It was submitted by Id AR that the assessee is an individual, who is deriving income from house property and interest income. It was the submission that during the impugned assessment year, the assessee had

deposited Rs.53,77,500/- in cash in her bank account during the demonetization period. It was the submission that the Assessing Officer had questioned the source of deposit. The assessee had submitted that the assessee relinquished her interest in her ancestral property in Nepal and had received the shares in cash from her property. It was the submission that as the assessee has given explanation and the affidavits of the brothers, which has also been produced before the Assessing Officer as also the copy of the relinquished deed which is registered, it was the prayer that the addition made by the AO and confirmed by Id CIT(A) be deleted.

4. In reply, Id Sr DR submitted that the money has come from Nepal and the assessee has not been able to show how the money was kept till it was deposited in the bank account. It was the submission that the assessee has claimed that she has received Rs.60,00,000/- from her brothers and how she has kept the money at home or cash in hand has not been explained. It was the prayer that the order of the Id CIT(A) be upheld.

5. We have considered the rival submissions. A perusal of the facts in the present case clearly shows that the assessee has produced the settlement deed between the assessee and her brothers. The settlement deed clearly mentions the assessee having received the consideration of Rs.60,00,000/- in Indian currency for her relinquishing the interest from the father's property. The relinquished deed also recognizes the death of the

assessee's father as also the number of brothers and sisters. As per relinquished deed alongwith her brothers and sisters are nine children. father. The total value of the father's property is shown as Rs.8.66 crores in Nepal Ruppaya. The assessee's share would be approximately Rs,96,00,000/- in Nepal currency. This would be equivalent to Indian currency of Rs.60,00,000/-. The assessee's brothers have also confirmed that they have given cash to the assessee. This being so, we are of the view that the assessee has given explanation in respect of cash deposit in the bank account. How the assessee has kept the money in her hand as cash in hand is admittedly for the assessee to explain but that does not become the foundation for an addition in respect of cash deposited in the bank account of the assessee. This being so, the addition as made by the AO and confirmed by Id CIT(A) stands deleted.

6. In the result, appeal of the assessee stands allowed.

Order dictated and pronounced in the open court on 20/08/2025.

SD/-
(RATNESH NANDAN SAHAY)
ACCOUNTANT MEMBER

SD/-
(GEORGE MATHAN)
JUDICIAL MEMBER

Ranchi ; Dated 20/08/2025
B.K.Parida, SPS (OS)

Copy of the Order forwarded to :

1. The Appellant : Sunila Jha, Qr. No.591,
Sector-IC, B.S.City, Bokaro-827001
2. The respondent: Income Tax Officer, Ward -
3, (4), Bokaro
3. The CIT(A)- NFAC, Delhi
4. Pr.CIT,
5. DR, ITAT, Ranchi
6. Guard file.
//True Copy//

By order

Sr.Pvt.secretary
ITAT, Ranchi

