

IN THE INCOME TAX APPELLATE TRIBUNAL, RANCHI BENCH, RANCHI

BEFORE SHRI GEORGE MATHAN, JUDICIAL MEMBER AND
SHRI RATNESH NANDAN SAHAY, ACCOUNTANT MEMBER

ITA No. 253/Ran/2024
(Assessment Years-2017-18)

Avikal Maskara, 5 th Floor, Panchvati Apartment, Kanke Road, Vasant Vihar, Ranchi-834008 PAN No. AXLPM 3649 P	Vs.	I.T.O., Ward-1(1), Ranchi.
Appellant/ Assessee		Respondent/ Revenue

Assessee represented by	Shri Rajiv Mittal, A.R.
Department represented by	Shri Khub Chand Pandya, Sr.DR
Date of hearing	06/10/2025
Date of pronouncement	06/10/2025

ORDER

PER: BENCH

1. This is an appeal filed by the assessee against the order of the Id. CIT(A), NFAC, Delhi in Appeal No. CIT(A), Ranchi/10627/2019-20 dated 26/03/2024 for the A.Y. 2017-18.
2. Shri Rajiv Mittal represented on behalf of the assessee and Shri Khub Chand Pandya, Id. Sr. DR represented on behalf of the revenue.
3. It was submitted by the Id. AR that during the impugned assessment year, the assessee is a partner in Mahabir Marketing Solutions. The assessee is also a Director in M/s Eon Sales Enterprises Private Limited. It was the submission that in the bank account belonging to M/s Eon Sales Enterprises Private Limited, cash had been deposited to an extent of Rs. 23,51,700/- in the Bank of Baroda Account No. 17020000718. It was a submission that the PAN number attached to the said bank account of the said company, however, was that of the

assessee. It was a submission that as the said cash had been deposited in the bank account of the company and the same showed up in the PAN details of the assessee, the Assessing Officer treated the cash deposit as an unexplained income of the assessee. It was a submission that he had no objection if the issue was restored to the file of the Assessing Officer to verify whether the bank account belonged to the company.

4. In reply, the Id. Sr.DR submitted that the assessee has not produced any evidence to show that PAN number of the assessee was wrongly attached to the said bank account.
5. We have considered the rival submissions. A perusal of the assessment order shows that the Assessing Officer himself accepts that the said bank account with Bank of Baroda belongs to M/s Eon Sales Enterprises Private Limited. Admittedly, the said account is connected to the PAN number of the assessee. The assessee has claimed that it has written to the bank that the mistake has been committed by the bank by attaching the wrong PAN number to the said bank account. As this issues have not been examined by the Assessing Officer, in the interest of justice and to obtain the correct facts, we are of the view that the issues in this appeal must be restored to the file of the Assessing Officer for readjudication and we do so. The Assessing Officer shall examine whether the said bank account has been disclosed by the said company M/s Eon Sales Enterprises Private Limited in its balance sheet. The Assessing Officer shall also examine the cash book of the said M/s Eon Sales Enterprises Private Limited. If the said company has adequate cash to make the said deposit and if the said bank account is shown in the balance sheet of the said company then obviously

the transactions in that bank account would belong to that company only and no addition would be liable to be made in the hands of the individual assessee. With these directions, the issues in this appeal are restored back to the file of Assessing Officer for readjudication after granting the assessee adequate opportunity of being heard.

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

Order announced in open court on 06/10/2025.

Sd/-
(RATNESH NANDAN SAHAY)
ACCOUNTANT MEMBER

Sd/-
(GEORGE MATHAN)
JUDICIAL MEMBER

Ranchi, Dated: 06/10/2025

**Ranjan*

Copy to:

1. Assessee
2. Revenue
3. CIT
4. DR
5. Guard File

By order

Sr. Private Secretary, ITAT, Ranchi