

आयकर अपीलीय अधिकरण, विशाखापटणम पीठ, विशाखापटणम
IN THE INCOME TAX APPELLATE TRIBUNAL
VISAKHAPATNAM “DIVISION” BENCH, VISAKHAPATNAM
(HYBRID HEARING)

श्रीरवीश सूद ,न्यायिकसदस्यएवंश्रीएसबालाकृष्णन, लेखासदस्यकेसमक्ष
BEFORE SHRI RAVISH SOOD, HON’BLE JUDICIAL MEMBER

&

SHRI S BALAKRISHNAN, HON’BLE ACCOUNTANT MEMBER

आयकर अपीलसं./I.T.A.Nos.432, 433 & 434/VIZ/2025
(निर्धारणवर्ष/ Assessment Year:2015-16, 2016-17 & 2018-19)

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| Gowripatnam Primary Agricultural Cooperative Credit Society Limited 1-284, Gowripatnam Devarapalli, Devarapalli – 534313 Andhra Pradesh [PAN:AABAG2827P] | Vs. | Income Tax Officer – Ward – 1 Tadepalligudem – 534101 Andhra Pradesh |
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|---|---|---------------------------|
| करदाता का प्रतिनिधित्व/ Assessee Represented by | : | Shri DRSN Sastry, CA |
| राजस्व का प्रतिनिधित्व/ Department Represented by | : | Dr. Aparna Villuri, Sr.AR |
| सुनवाई समाप्त होने की तिथि/ Date of Conclusion of Hearing | : | 23.09.2025 |
| घोषणा की तारीख/Date of Pronouncement | : | 13.10.2025 |

आदेश /ORDER

PER BENCH:

1. These appeals are filed by the assessee against different orders of Learned Commissioner of Income Tax (Appeals), National Faceless Appeal centre,

Delhi [hereinafter in short “Ld.CIT(A)”] vide respective DIN & Order No. as stated below: -

| ITA No. (A.Y.) | DIN & Order No. | Dated |
|--|---------------------------------------|--------------|
| ITA No. 432/VIZ/2025 (A.Y. 2015-16) | ITBA/NFAC/S/250/2025-26/1076662247(1) | 03.06.2025 |
| ITA No. 433/VIZ/2025 (A.Y. 2016-17) | ITBA/NFAC/S/250/2025-26/1076662839(1) | 03.06.2025 |
| ITA No. 434/VIZ/2025 (A.Y. 2018-19) | ITBA/NFAC/S/250/2025-26/1076663108(1) | 03.06.2025 |

2. Since the appeals are belonging to same assessee, therefore, all these appeals are clubbed and heard together and a consolidated order being passed. Firstly, we take up the appeal in ITA No. 432/VIZ/2025 (A.Y. 2015-16) as lead appeal and brief facts are culled out therefrom.

ITA No. 432/VIZ/2025 (A.Y. 2015-16)

3. This appeal is filed by the assessee against the order of Learned Commissioner of Income Tax (Appeals), National Faceless Appeal centre, Delhi [hereinafter in short “Ld.CIT(A)”] vide DIN & Order No. ITBA/NFAC/S/250/2025-26/1076662247(1) dated 03.06.2025 for the A.Y.2015-16 arising out of order passed under section 147r.w.s144 of Income Tax Act, 1961 (in short ‘Act’) dated 20.03.2024.

4. Brief facts of the case are, assessee is a primary Agricultural Co-operative Credit Society formed for the benefit of Agricultural Farmers. Assessee has not

filed return of income under section 139(1) of the Act. As per the information available with the department, the assessee has entered into the following transactions and has not filed return of income: -

| S.No. | Information Code | Nature of transactions | Name of the Bank | Aggregate amount of deposit (Rs.) |
|--------------|-------------------------|--|---|--|
| 1. | AIR – 001 | Deposited cash of Rs.10,00,000/- or more in a saving bank account | Andhra Bank Gowripatnam | 1,15,56,880/- |
| 2. | CIB-410 | Deposit in cash of Rs.10,00,000/- or more in a saving bank account | Andhra Bank Gowripatnam Account Number 63810011000974 | 36,08,000/- |
| | | | | 1,51,64,880/- |

5. Thereafter, Ld. Assessing Officer [hereinafter in short “Ld.AO”] issued notice under section 148 of the Act on 04.04.2022. In response, assessee filed its return of income on 17.06.2022 and claimed deduction under section 80P(2)(a)(i) of the Act of Rs.5,21,381/-. Subsequently, statutory notices under section 143(2) and 142(1) of the Act were issued and served on the assessee, calling for certain information. Ld. AO asked the assessee to furnish a detailed note on eligibility of deduction claimed under section 80P(2)(a)(i) of the Act. In response, assessee furnished its reply, and submitted the detailed working of the society and also submitted the trial balance. After considering the submissions of the assessee, Ld. AO accepted the reply of the assessee in respect to cash deposits. However, on the issue of deduction claimed under section 80P(2)(a)(i) of the Act, Ld. AO observing that the return was filed in response to notice under section 148 of the Act and not within the due date

under section 139(1) of the Act denied the deduction claimed by the assessee. Further, Ld. AO also treated interest of Rs.7,04,473/- earned on bank deposits as income from other sources under section 56 of the Act and not eligible for deduction under section 80P of the Act.

6. On being aggrieved, assessee filed an appeal before Ld. CIT(A). Ld.CIT(A) sustained the order of the Ld. AO.

7. On being aggrieved by the order of the Ld. CIT(A), assessee is in appeal before us by raising following grounds of appeal: -

“1. The learned CIT(A) erred in law and on facts in confirming the disallowance of deduction of Rs. 5,21,381/- claimed u/s 80P(2)(a)(i) of the Income Tax Act, 1961, despite the appellant being a registered Primary Agricultural Co-operative Credit Society.

2. The learned CIT(A) failed to appreciate that the return filed in response to notice u/s 148 is a valid return under the Act and the claim of deduction u/s 80P(2)(a)(i) cannot be denied on the ground that it was not filed under section 139(1). Further Section 80A(5) bars deduction only if not claimed in the return. Appellant had claimed in deduction in response to the notice under section 148, and deduction should be allowed. And further, Section 80AC amendment applies only from AY2018-19 onwards, not from AY 2015-16. As this matter relates to the AY 2015-16.

3. The learned CIT(A) erred in relying on the judgment of Kerala High Court in Nileshtar Range Kallu Chethu Vyavasaya Sahakarana Sangham [2023] 152taxmann.com 347, which is distinguishable on facts.

In the Nileshtar Range Kallu Chethu Vyavasaya Sahakarana Sangham [2023] 152taxmann.com 347 case the return was not just delayed; it was filed long after even the reassessment proceedings, and the claim was new and not previously declared, and but in present case ie., gowripatnam primary agricultural cooperative credit society limited, the return was filed in response to a valid

noticeu/s 148, which reopens the assessment and allows a reassessment of total income including all deductions under 80P(2)(a)(i) of the Income Tax act, 1961.

4. *The learned AO erred in assessing the interest income of Rs.7,04,473 as 'Income from Other Sources' without appreciating that the same was earned in the course of business and is eligible for deduction u/s 80P(2)(a)(i).*

5. *The appellant craves leave to add, alter, or amend any grounds of appeal at the time of hearing.”*

8. The only issue emanating from the grounds raised by the assessee is with respect to disallowance of deduction claimed by the assessee under section 80P of the Act.

9. At the outset, the Learned Authorized Representative [Ld. AR] argued that the assessee is a Primary Agricultural Credit Society Limited and claimed deduction under section 80P of the Act for the A.Y.2015-16. Ld.AR submitted that Ld. AO/Ld. CIT(A) erred in appraising that the return filed by the assessee is an invalid return since the same is not filed under section 139(1) or 139(4) of the Act without considering that for the purpose of claiming deduction u/s 80P, the return of income is required to be filed u/s 139(1) w.e.f A.Y.2018-19 only. The Ld. AR further submitted that as per section 80P(2)(a)(i) of the Act, the assessee is entitled for deduction as the assessee is being a primary agricultural cooperative credit society registered under the Societies Act. The Ld. AR further submitted that section 80A(5) cannot be applied in the instant case due

to the fact that it does not mention within which period the return should be filed. The Ld.AR further submitted that section 80AC(ii) which was inserted w.e.f. 1/4/2018 specifies that “any Deduction is admissible under any provisions of this Chapter under heading “C-deductions in respect of certain incomes” no such deduction shall be allowed to him unless he furnishes a return of his income for such assessment year on or before the due date specified under sub-section (1) of section 139 of the Act. The Ld. AR argued that since the heading “C-deductions in respect of certain incomes” has been segregated from the other deductions it has to be applied to the instant case also. The Ld. AR further argued that as per the Finance Act, 2018 which came into effect w.e.f 01/04/2018, the substitution to section 80AC is only applicable from the assessment year commencing on or after 01/04/2018 i.e., A.Y.2018-19 and not applicable to the earlier assessment years i.e., A.Y. 2015-16 & 2016-17 as in the case of the assessee. Therefore, the assessee is entitled to claim deduction under section 80P(2)(a)(i) of the Act even though the return of income is filed belatedly in response to notice under section 148 of the Act.

10. Per contra, the Ld. DR submitted that the assessee has not filed a valid return of income in accordance with the provisions of section 139(1) or 139(4) of the Act in order to claim deduction under section 80P of the Act. The Ld. DR further submitted that as per section 80A(5) of the Act when no valid return of income is filed, the assessee has failed to make a claim of deduction under

section 80P(2)(a)(i) of the Act, and therefore no deduction is permissible under the Act. The Ld. DR strongly relied on the orders of the Ld. Revenue Authorities.

11. We have heard both the sides and perused the material available on record as well as the orders of the Revenue Authorities. It is an admitted fact that the assessee has failed to file the return of income under section 139(1) of the Act. Further, in response to notice under section 148 of the Act issued on 04.04.2022, assessee belatedly filed the return of income on 17.06.2022 by claiming deduction under section 80P of the Act amounting to Rs.5,21,381/-. The Ld. AO while invoking the provisions of section 80A(5) and 80AC of the Act observed that the assessee has not filed the return of income on or before the due date of filing the return of income under section 139(1) of the Act and therefore disallowed the deduction claimed by the assessee. The Ld. AO arrived at this conclusion by treating the return of income filed belatedly as invalid and non-est. Section 80A(5) and Section 80AC of the Act are reproduced herein below for reference:

“80A(5) Where the assessee fails to make a claim in his return of income for any deduction under section 10A or section 10AA or section 10B or section 10BA or under any provision of this Chapter under the heading "C.—Deductions in respect of certain incomes", no deduction shall be allowed to him thereunder.

12. On a plain reading of section 80A(5) of the Act, it is clear that the assessee should make a claim in the return of income for claiming deduction under “Certain income under the Chapter heading "C". However, the section does not specify that whether the deduction is allowable if the return of income is filed belatedly. The only condition is that the assessee should make a claim while filing the return of income. In the case on hand, the assessee has made a claim for deduction u/s 80P while filing the return of income on 17.06.2022, in response to notice u/s 148 of the Act.

13. Section 80AC of the Act is reproduced below for ready reference: -

“80AC. Where in computing the total income of an assessee of any previous year relevant to the assessment year commencing on or after—

(i) the 1st day of April, 2006 but before the 1st day of April, 2018, any deduction is admissible under section 80-IA or section 80-IAB or section 80-IB or section 80-IC or section 80-ID or section 80-IE;

(ii) the 1st day of April, 2018, any deduction is admissible under any provision of this Chapter under the heading "C.—Deductions in respect of certain incomes",

no such deduction shall be allowed to him unless he furnishes a return of his income for such assessment year on or before the due date specified under sub-section (1) of section 139.”

14. Similarly, from the A.Y. 2018-19 section 80AC(ii) was introduced to allow the deduction under certain income under Chapter heading "C-Deductions in respect of certain incomes", unless the return of income for such assessment year has been filed on or before the due date specified under section 139(1) of

the Act. This condition was not applicable for the A.Y. 2015-16 & 2016-17. In the instant case, the assessee filed the return of income for A.Y. 2015-16, belatedly on 17.06.2022 during the course of assessment proceedings. Further, the amendment to section 80AC was considered prospective by various judicial pronouncements. It can be observed from the provisions of section 80A(5) of the Act, which can be made applicable to the instant case, only when the return of income is filed by an assessee and deduction under Chapter-VIA of the Act is not claimed while filing the return of income. The provisions of section 80AC of the Act contemplate denial of deduction of certain provisions of Chapter-VIA of the Act if the return of income is not filed by the assessee on or before the due date specified under sub-section (1) of section 139 of the Act. These provisions, introduced from the A.Y. 2018-19 in our opinion, is prospective and hence do not apply to the deduction under section 80P of the Act in the instant case for the impugned assessment year. Therefore, we are of the considered view that the Revenue is not justified in not entertaining the deduction under section 80P of the Act made by the assessee while filing the return of income for A.Y.2015-16 on 17.06.2022. Accordingly, we direct the Ld. AO to consider the claim of the assessee under section 80P as made in the return of income filed on 17.06.2022. Hence, this issue is set aside to the record of the Ld. AO for examination of the amount of claim made by the assessee under section 80P on merits. The case laws relied on by the Ld. DR are distinguishable on the facts

that in those cases assessee has never filed return of income and hence cannot be applied to the instant cases.

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

ITA No. 433/VIZ/2025 (A.Y. 2016-17)

16. Assessee has raised following grounds of appeal: -

“1. The CIT(A) erred in upholding the addition of Rs. 2,03,28,672/- u/s 69A of the Income Tax Act, ignoring the audited books of accounts and submissions proving the sources of cash deposits. Cash deposits made are out of amounts received as deposits from members, amounts received from sale of fertilizers, seeds, pesticides, PDS commodities and credit facilities provided to the members.

2. The disallowance of deduction u/s 80P(2)(a)(i) of Rs. 5,25,763/- is erroneous and unjustified. The Appellant's core activity is providing agricultural credit to its members in accordance with its by-laws, and all such transactions are duly recorded in the audited books of accounts.

3. In the case of present appellant, AY 2018-19, a larger cash deposit of Rs.2,96,43,153/- was accepted by the AO after verifying the same nature of transactions. Similarly, in AY 2015-16, the AO accepted cash deposits of Rs.1,51,64,880/- without invoking Section 69A. However, for AY 2016-17, despite the appellant carrying out the same nature of business and submitting similar explanations supported by audited records, the AO has not accepted the cash deposits and has made an arbitrary addition under Section 69A. This selective rejection, in the absence of any change in facts or law, is discriminatory and devoid of merit.

4. Judicial precedents supporting the Appellant:

A. PCIT v. Mavilayi Service Co-op Bank Ltd. (2021) 123 taxmann.com 161B.(SC): The Supreme Court held that a co-operative society engaged in providing credit facilities to its members is eligible for deduction under section 80P(2)(a)(i), and the nature of membership is not determinative.

B. CIT v. Jafari Momin Vikas Co-op Credit Society Ltd. [2014] 49 taxmann.com 289 (Gujarat HC): It was held that once a society is registered and activities are confined to its members, the

deduction under section 80P(2)(a)(i) cannot be denied unless evidence shows activities with non-members.

5. *The appellant reserves the right to add, alter, or withdraw any ground at the time of hearing.”*

17. With respect to Ground No.2, i.e., on the issue of disallowance of deduction under section 80P(2)(a)(i) of the Act, since the ground and facts in this case are identical, the decision taken in assessee's case for the A.Y.2015-16 as in preceding paras shall *mutatis mutandis*, applicable to ITA No.433/VIZ/2025. Accordingly Ground raised by the assessee is allowed for statistical purposes.

18. With respect to Ground No.1, for the year under consideration, Ld. AO has treated as amount of Rs.2,03,28,672/- as unexplained money under section 69A of the Act and added the same to the total income of the assessee and the same was sustained by the Ld. CIT(A).

19. Before us, Ld.AR prayed that facts for the A.Y. 2015-16 & 2016-17 remain the same and was allowed in the earlier assessment year. The Ld.AR further submitted that there is no change in the business activities of the assessee and accordingly the reply was furnished to the Ld.AO regarding the cash deposits. However, the Ld.AO accepted the assessee's contention for the A.Y. 2015-16 & A.Y. 2018-19 but has failed to consider for the A.Y. 2016-17.

He therefore prayed to delete the addition made by the Ld.AO without following the principle of consistency.

20. Per contra, Ld. DR objected to the submissions of the Ld.AR.

21. We have heard both the sides and perused the material available on record. The Ld.AO has accepted the explanation furnished by the assessee with regard to the cash deposits made during the A.Y. 2015-16 but has rejected the contention of the assessee in the impugned assessment year. The Ld.AO has not advanced any reasons for rejecting the same during the current assessment year. There is merit in the argument of the Ld.AR that since the cash deposits are arise out of the same business activity carried on by the assessee in both the assessment years, rejecting the same in the A.Y. 2016-17 without adducing cogent reasons is devoid of merits. We also find that the Ld.AO was satisfied with the explanation furnished by the assessee with regard to the cash deposits made during A.Y. 2018-19. We therefore direct the Ld.AO to delete the addition made on account of cash deposits amounting to Rs.2,03,28,672/- as no material has been brought on record by the revenue authorities to disallow the cash deposits during the impugned assessment year. Accordingly, ground raised by the assessee is allowed.

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

ITA No. 434/VIZ/2025 (A.Y. 2018-19)

23. Briefly stated the facts of the case are that the assessee being a Cooperative Society Limited has not filed any return of income under section 139(1) of the Act. As Per the information received from Risk Management Strategy formulated by the CBDT through Insight Portal under the head NMS for F.Y.2017-18, the assessee under took the following transactions:-

| Information code | Description | Source | Amount (Rs.) |
|-------------------------|---|---|---------------------|
| SFT-003(D) | Cash deposits (including through bearer cheque) in current account | The District Co-op central Bank Limited | 23,86,974 |
| SFT-003(W) | Cash withdrawals (including through bearer cheque) in current account | The District Co-op central Bank Limited | 60,07,232 |
| SFT-004 | Cashdeposits in one or more accounts (other than current account) of a person | The District Co-op central Bank Limited | 74,65,277 |
| SFT-004 | Cash deposits in one or more accounts (other than in current account and time deposits) of a person | Andhra Bank | 1,37,83,670 |

24. Thereafter, Ld. AO, notice under section 148 of the Act was issued on 04.04.2022 and notice under section 142(1) was issued on various dates. In response, assessee filed return of income on 12.07.2022 and claimed deduction under section claimed deduction u/s 80P(2)(a)(i) of the Act and assessee filed its submissions justifying the cash deposits and deduction claimed with documentary evidences. After examining the details and explanation submitted by the assessee during the assessment proceedings, the Ld. AO accepted the submissions made with respect to the cash deposits. However, on the issue of

deduction claimed under section 80P(2)(a)(i) of the Act, Ld. AO observing that the return was filed in response to notice under section 148 of the Act and not within the due date under section 139(1) of the Act, denied the deduction claimed by the assessee.

25. On being aggrieved by the order of the Ld. AO, assessee preferred an appeal before the Ld. CIT(A). After considering the submissions of the assessee, Ld. CIT(A) sustained the order of the Ld. AO.

26. On being aggrieved, assessee filed an appeal before us by raising following grounds of appeal: -

“1. The CIT(A) erred in upholding the disallowance of deduction of Rs.2,40,747/- under Section 80P(2)(a)(i) of the Income Tax Act, 1961 solely on the ground that the return was filed beyond the due date specified under Section 139(1), without appreciating that the Appellant had filed a valid return in compliance with the notice u/s 148.

2. The learned CIT(A) failed to appreciate that Section 80P(2)(a)(i) is a beneficial provision enacted to promote and support co-operative credit societies serving rural farmers. The Appellant is a genuine and regularly audited by cooperative department auditors and whose operations and income fully comply with the conditions laid down under the said provision. The invocation of Section 80AC to deny the deduction under Chapter VIA, despite the filing of return in response to valid reassessment proceedings, results in denial of substantive justice for mere procedural non-compliance.

3. Judicial precedents supporting the Appellant:

A. CIT v. G.M. Knitting Industries (P) Ltd. [(2015) 376 ITR 456 (SC)]: The Supreme Court held that a return filed under Section 139(4) is valid, and deduction cannot be denied merely for not filing under Section 139(1), if other conditions are fulfilled. In the present case, the return was filed under Section 148 and duly accepted. K.K. S.K. Co-operative Society Ltd. v. ITO [(2021) 130 taxmann.com 255 (Madras HC)]: The High Court held that

Section 80P being a beneficial provision should not be denied due to procedural delay if the claim is otherwise legitimate. The Appellant qualifies under Section 80P(2)(a)(i), and delay should not disentitle the deduction. PACS filed return in response to Section 148 and claimed deduction under Section 80P. AO rejected the claim based on Section 80AC. The High Court held that provisions of Section 80P are beneficial in nature and ought to be interpreted liberally. Delay due to procedural default should not defeat a legitimate claim, particularly when there is no tax evasion. The deduction u/s 80P(2)(a)(i) should not be denied where the source of income is not in dispute and return was filed under Section 148. The Appellant reserves the right to add, alter, or withdraw any ground at the time of hearing.

27. The only issue agitated by the assessee is with respect to disallowance of deduction of Rs.2,40,747/- claimed under section. 80P(2)(a)(i) of the Act stating that the return of income was not filed within the due date as specified U/s.139(1) of the Act.

28. On this issue, Ld.AR argued that the return of income was filed u/s.139(4) of the Act and hence the claim made by the assessee u/s.80P of the Act while filing the return of income shall be allowed. The Ld. AR also reiterated that section 139(4) of the Act is not an independent provision and cannot be construed as having separate existence from section 139(1) of the Act.

29. Per contra, Ld. DR submitted that as per section 80AC of the Act, no deduction shall be allowed to the assessee if the return of income is not filed on or before the due date specified U/s. 139(1) of the Act. The Ld. DR therefore submitted that the Ld. AO has rightly invoked the provisions of section 80AC of the Act and pleaded that the orders of the Ld. Revenue Authorities be upheld.

30. We have heard both the sides and perused the material available on record as well as the orders of the Ld. Revenue Authorities. Admittedly the assessee has not filed its return of income within the due date specified U/s.139(1) of the Act for the A.Y 2018-19. The assessee has filed its return of income belatedly under section 139(4) of the Act on 12.07.2022 by claiming deduction under section 80P of the Act. In this connection section 80AC introduced by the Finance Act, 2018 w.e.f 1/4/2018 is extracted below:

“Sec. 80AC. Where in computing the total income of an assessee of any previous year relevant to the assessment year commencing on or after—

- (i) the 1st day of April, 2006 but before the 1st day of April, 2018, any deduction is admissible under section-80-IA or section-80-IAB or section-80-IB or section-80-IC or section-80-ID or section-80-IE;*
- (ii) the 1st day of April, 2018, any deduction is admissible under any provision of this Chapter under the heading "C.— Deductions in respect of certain incomes",*

no such deduction shall be allowed to him unless he furnishes a return of his income for such assessment year on or before the due date specified under sub-section (1) of section-139.]”

31. From the plain reading of the above section 80AC of the Act it is clear that any deduction under the provisions of this Chapter under the heading “C-Deduction in respect of certain incomes”, no such deduction shall be allowed unless the assessee files the return of income on or before the due date specified U/s. 139(1) of the Act. Further, there is no merit in the argument of the Ld. AR that section 139(4) is not an independent provision. We also extract below section 139(4) of the Act which reads as under:

“Sec. 139(4): Any person who has not furnished a return within the time allowed to him under sub-section (1), may furnish the [return for any previous year at any time before three months prior to] the end of the relevant assessment year or before the completion of the assessment, whichever is earlier.”

32. From the bare reading of sub-section (4) of section 139 of the Act, it is clear that *“any person who has not furnished the return of income within the time limit allowed under sub-section (1) of the Act, may furnish the return of income.....whichever is earlier”*. The intention of the Legislature is to facilitate and exercise the option to file the return of income belatedly under section 139(4) of the Act for those assesseees who have not filed return of income within the time limit specified u/s 139(1) of the Act. However, section 80AC limits its allowability of deduction under this Chapter *“deduction in respect of certain income”* specifically for the return of income furnished on or before the due date specified under section 139(1) of the Act and not for return of income furnished under section 139(4) of the Act. Therefore, it cannot be given an extended interpretation to cover the return of income filed under section 139(4) of the Act. We are therefore inclined to dismiss the grounds raised by the assessee.

33. In the result, appeal of the assessee is dismissed.

34. To sum up, appeal filed by the assessee in ITA No.432/VIZ/2025 for the A.Y. 2015-16 is allowed for statistical purposes and ITA No. 433/VIZ/2025 for

the A.Y. 2016-17 is partly allowed for statistical purposes. Appeal filed by the assessee in ITA No. 434/VIZ/2025 (A.Y. 2018-19) is dismissed.

Order pronounced in the open court on 13th October, 2025.

Sd/-

(रवीश सूद)

(RAVISH SOOD)

न्यायिक सदस्य/JUDICIAL MEMBER

Dated:13.10.2025

Giridhar, Sr.PS

Sd/-

(एस बालाकृष्णन)

(S. BALAKRISHNAN)

लेखा सदस्य/ACCOUNTANT MEMBER

आदेश की प्रतिलिपि अग्रेषित/ Copy of the order forwarded to:-

1. निर्धारिती/ The Assessee : **Gowripatnam Primary Agricultural Cooperative Credit Society Limited**
1-284, Gowripatnam
Devarapalli, Devarapalli – 534313
Andhra Pradesh
2. राजस्व/ The Revenue : **Income Tax Officer – Ward – 1**
Tadepalligudem – 534101
Andhra Pradesh
3. The Principal Commissioner of Income Tax
4. विभागीयप्रतिनिधि, आयकरअपीलीयअधिकरण, विशाखापटणम /DR,ITAT, Visakhapatnam
5. The Commissioner of Income Tax
6. गार्डफ़ाईल / Guard file

आदेशानुसार / BY ORDER

Sr. Private Secretary
ITAT, Visakhapatnam