

**IN THE INCOME TAX APPELLATE TRIBUNAL
COCHIN BENCH**

**BEFORE SHRI INTURI RAMA RAO, AM
AND SHRI ANIKESH BANERJEE, JM**

**ITA No. 642 /Coch/2025
Assessment Year: 2018-19**

St. Josephs Educational and Charitable Trust Appellant
St. Gosephs Generalate, Kottayam 686006
[PAN: AAHTS8310C]

vs.

ITO (Exemptions), Kottayam Respondent

Assessee by: Shri Romid C.J., CA
Revenue by: Shri Sanjit Kumar Das, CIT-DR

Date of Hearing: 29.10.2025
Date of Pronouncement: 31.10.2025

ORDER

Per: Inturi Rama Rao, AM

This appeal filed by the assessee is directed against the order of the National Faceless Appeal Centre, Delhi (NFAC) dated 17.07.2025 for Assessment Years (AY) 2018-19.

2. Brief facts of the case are that the appellant is a charitable trust registered u/s. 12A of the Income Tax Act, 1961 (the Act). No return of income u/s. 139(1) was filed for AY 2018-19 by the appellant. Subsequently, the AO issued a notice u/s. 148 calling upon the appellant to file return of income as he formed an opinion that income escaped assessment to tax. In response to the notice u/s. 148,

the appellant trust filed return of income disclosing Nil income. Against the said return of income, the assessment was completed by the Assessment Unit, Income Tax Department (hereinafter called "the AO") vide order dated 23.03.2023 passed u/s. 147 r.w.s. 144B of the Act at a total income of Rs. 3,35,59,044/-. While doing so, the AO treated the cash deposits made in the bank accounts of Rs. 2,99,85,604/- as unexplained money of the Trust. The AO also made addition on account of receipt of interest income of Rs. 20,73,440/-. He also made addition on account of term deposit of Rs. 15,00,000/- as unexplained investment of the assessee for failure of the assessee to offer explanation in support of the source of the above investment.

3. Being aggrieved, an appeal was filed before the CIT(A), who vide the impugned order confirmed the action of the AO.

4. Being aggrieved, the appellant is in appeal before this Tribunal in the present appeal.

5. We have heard the rival contentions and perused the material available on record. At the outset, we find that the NFAC had failed to adjudicate the grounds of appeal raised by the appellant and the written submission filed by the appellant seeking deletion of addition made by the AO. Thus, the order passed by the NFAC is unreasonable and, therefore, the matter is restored back to the file of the NFAC for fresh adjudication.

6. In the result, the appeal filed by the assessee stands partly allowed for statistical purposes.

Order pronounced in the open court on 31st October, 2025.

Sd/-
(ANIKESH BANERJEE)
JUDICIAL MEMBER

Sd/-
(INTURI RAMA RAO)
ACCOUNTANT MEMBER

Cochin, Dated: 31st October, 2025

n.p.

Copy to:

1. The Appellant
2. The Respondent
3. The Pr. CIT concerned
4. The Sr. DR, ITAT, Cochin
5. Guard File

Assistant Registrar
ITAT, Cochin