

**IN THE INCOME TAX APPELLATE TRIBUNAL
"SMC" BENCH, AHMEDABAD
BEFORE DR. B.R.R. KUMAR, VICE-PRESIDENT
SHRI T R SENTHIL KUMAR, JUDICIAL MEMBER**

ITA No.1743/Ahd/2025
(Assessment Year: 2017-18)

Bhikhabhai Mangalbhai Patel, C/57, Amin Park Society, Nr. Pavandham Society, Manjalpur, Vadodara-390011. [PAN :ACJPP3974 H]	Vs.	The Income Tax Officer, Ward-4(1)(1), Vadodara.
(Appellant)	..	(Respondent)

Appellant by :	Shri M K Patel, AR
Respondent by:	Shri Rohit Aasudani, Sr. DR
Date of Hearing	12.11.2025
Date of Pronouncement	13.11.2025

ORDER

PER DR. B.R.R. KUMAR, VICE-PRESIDENT:-

This appeal is filed by the Assessee against the appellate order dated 17.07.2025 passed by the Commissioner of Income Tax (Appeals) National Faceless Appeal Centre, Delhi, relating to the Assessment Year 2017-18.

2. The assessee has raised the following grounds of appeal:

- 1. The learned CIT(A) has grievously erred in law, and on facts, in confirming the addition of Rs.15,00,000/- made in respect of cash deposited in appellant's bank account.*

2. *That on facts and in law, the entire addition ought to have been deleted as prayed for.*
3. *The appellant craves leave to add, alter, amend any ground of appeal.*

3. On perusal of the records, we find that the Assessing Officer made an addition of **Rs.15,00,000** on account of cash deposits made by the assessee in three different bank accounts, as detailed below:

Sr.No.	Name of Bank	Amount(in Rs.)	Date of Deposit
1.	State Bank of India	5,00,000/-	16.11.2016
2.	Axis Bank	7,00,000/-	14.11.2016
3.	ICICI Bank	3,00,000/-	25.11.2016

4. The assessee furnished copies of bank statements showing that on **18.07.2016**, withdrawals were made of **Rs.5,00,000/-**, **Rs.7,00,000/-**, and **Rs.3,00,000/-**, which were subsequently re-deposited in the respective bank accounts on **16.11.2016**, **14.11.2016**, and **25.11.2016**. The Ld. Counsel for the assessee further explained that these withdrawals were made for the purpose of **construction of a house**. However, as the construction activity did not materialize, the withdrawn funds were re-deposited into the same bank accounts. On verification, we find that the deposits are duly supported by corresponding withdrawals from the same bank accounts. Considering these facts and the explanation of the assessee, we are of the view that the source of deposits stands satisfactorily explained. Hence, the addition made by the Assessing Officer of **₹15,00,000/-** cannot be sustained.

5. In the result, the appeal of the assessee is allowed.

The order is pronounced in the open Court on 13.11.2025.

**Sd/-
(T R SENTHIL KUMAR)
JUDICIAL MEMBER**

**Sd/-
(DR. B.R.R. KUMAR)
VICE-PRESIDENT**

Ahmedabad; Dated (True Copy)
13.11.2025
MV

आदेश की प्रतिलिपि अग्रेषित / Copy of the Order forwarded to :

1. अपीलार्थी / The Appellant
2. प्रत्यर्थी / The Respondent.
3. संबंधित आयकर आयुक्त / Concerned CIT
4. आयकर आयुक्त (अपील) / The CIT(A)-
5. विभागीय प्रतिनिधि, आयकर अपीलीय अधिकरण, अहमदाबाद / DR, ITAT, Ahmedabad
6. गार्ड फाईल / Guard file.

आदेशानुसार / BY ORDER,

**सहायक पंजीकार (Dy./Asstt. Registrar)
आयकर अपीलीय अधिकरण, अहमदाबाद / ITAT, Ahmedabad**