

**IN THE INCOME TAX APPELLATE TRIBUNAL "SMC BENCH", RANCHI  
BEFORE SHRI GEORGE MATHAN, JUDICIAL MEMBER  
(THROUGH HYBRID MODE)**

**आयकर अपील सं./ITA No.280/RAN/2025**

**(निर्धारण वर्ष / Assessment Year :2020-2021)**

<b>Ajay Engicone Private Limited</b> Harihar Singh Road, Morabadi, Ranchi-834008	Vs.	<b>DCIT, Circle-1, Ranchi</b>
स्थायी लेखा सं./PAN No. : <b>AADCA 2509 E</b>		
(अपीलार्थी /Appellant)	..	(प्रत्यर्थी / Respondent)

निर्धारिती की ओर से /Assessee by	:	Shri Vinay Jalan, AR
राजस्व की ओर से /Revenue by	:	Shri Khubchand T Pandya, Sr. DR

सुनवाई की तारीख / <b>Date of Hearing</b>	:	25/11/2025
घोषणा की तारीख/ <b>Date of Pronouncement</b>	:	25/11/2025

**आदेश / O R D E R**

This is an appeal filed by the revenue against the order of the Id. CIT(A), National Faceless Appeal Centre (NFAC), Delhi, dated 04.03.2025 for the assessment year 2020-2021.

2. Shri Vinay Jalan, Id. AR represented on behalf of the assessee. Shri Khubchand T Pandya, Sr. DR appeared on behalf of the revenue.

3. It was submitted by the Ld. AR that the during the impugned assessment year the assessee had taken two loans of Rs.5 lakhs/- each from M/s.Mithilesh Kumar and M/s. Gourav Construction Pvt. Ltd. It was submission that these loans have been repaid in subsequent year also. It was submission that before the AO it was shown that transactions were made through banking channels. It was submission that this was not accepted by AO. It was submission that the assessee may be granted one

more opportunity to provide the details of the said two creditors. It was prayer that assessee may be given one more opportunity to represent its case before the AO.

4. In reply, the Id. Sr. DR did not raised any serious objection.

5. I have considered the submissions. As the assessee has not provided the details of the two creditors, so as to grant the assessee adequate opportunity to produce the details and to prove the genuineness and creditworthiness and identity of the creditors, the issues in this appeal are restored to the file of the AO for readjudication after granting the assessee adequate opportunity being heard.

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

Order dictated and pronounced in the open court on 25/11/2025.

**Sd/-**  
**(GEORGE MATHAN)**  
**न्यायिक सदस्य / JUDICIAL MEMBER**

**राँची** Ranchi; दिनांक Dated 25/11/2025

Prakash Kumar Mishra, Sr.P.S.

**आदेश की प्रतिलिपि अद्योषित/Copy of the Order forwarded to :**

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

सत्यापित प्रति //True Copy//

आदेशानुसार/ BY ORDER,

**(Senior Private Secretary)**  
आयकर अपीलीय अधिकरण, राँची / ITAT, Ranchi