

आयकर अपीलिय अधिकरण, 'ए' न्यायपीठ, चेन्नई  
IN THE INCOME-TAX APPELLATE TRIBUNAL 'A' BENCH, CHENNAI  
श्री एस.एस. विश्वनेत्र रवि, न्यायिक सदस्य एवं श्री जगदीश, लेखा सदस्य के समक्ष ।  
Before Shri S.S. Viswanethra Ravi, Judicial Member &  
Shri Jagadish, Accountant Member

**I.T.A. No.2349/Chny/2025**

निर्धारण वर्ष/Assessment Year: 2019-20

&

**C.O. No. 82/Chny/2025 [In I.T.A. No.2349/Chny/2025]**

The Income Tax Officer,  
Non Corporate Ward 1(4),  
Coimbatore.

Vs. Dhamodiran Raveendiran,  
Old. No. 8A, New No. 16,  
RKK Nagar, Neelikonampalayam,  
Coimbatore 641 033.

**[PAN: AVCPR1594F]**

(अपीलार्थी/Appellant)

(प्रत्यर्थी/Respondent/Cross Objector)

अपीलार्थी की ओर से / Appellant by : Ms. E. Pavuna Sundari, CIT (Virtual)  
प्रत्यर्थी की ओर से/Respondent by : Shri R. Jaishankar, CA (Virtual)  
सुनवाई की तारीख/ Date of hearing : 24.11.2025  
घोषणा की तारीख /Date of Pronouncement : 04.12.2025

**आदेश /O R D E R**

**PER S.S. VISWANETHRA RAVI, JUDICIAL MEMBER:**

This appeal filed by the Revenue is directed against the order dated 17.06.2025 passed by the Id. Commissioner of Income Tax (Appeals), National Faceless Appeal Centre [NFAC], Delhi for the assessment year 2019-20.

2. We find grounds of appeal raised by the Appellant-Revenue “cash deposits recorded in the register maintained in the assessee books of

*accounts is found to be inconsistent as submitted before the undersigned”.*

3. It is noted that according to the Assessing Officer that the assessee has deposited the cash of ₹.29,83,88,500/- in his bank account maintained with State Bank of India and Indian Overseas Bank. Accordingly, the Assessing Officer reopened the assessment and held that the assessee is failed to prove the bank credits are normal business receipts and added the same to the total income of the assessee under section 69A of the Act. Aggrieved by the same, the assessee challenged the said assessment order before the first appellate authority. The Id. CIT(A) was of the opinion that the Jurisdictional Assessing Officer has not specified as to what are the mismatches in bank statements viz-a-viz stock register furnished by the assessee. Accordingly, deleted the addition made by the Assessing Officer.

4. Before us, the Id. DR Ms. E. Pavuna Sundari, CIT relied on the order of the Assessing Officer and supports the findings of the Assessing Officer in holding that the assessee failed to prove the said credits in the said two bank accounts are business receipts. She prayed to restore the order of the Assessing Officer and allow the ground.

5. The Id. AR Shri R. Jaishankar, CA submits that the Assessing Officer erroneously treated cash deposits in the two bank accounts as unexplained money under section 69A of the Act and failed to appreciate the said amounts were not personal funds, but, Government related collections substantiated by stock registers, customer lists, cash receipt register and bank statement. He submits that the assessee fully reconciled every cash deposit with corresponding customer entry in the stock register and the respective bank account. He argued that the list of persons, who paid stamp duty and registration fees along with daily registers clearly establishes that each deposit co-relates with Government duty collections. He submits that the Id. CIT(A) appreciated the true nature of the assessee's business supported by the explanation offered by the assessee. The findings of the Id. CIT(A) conclusively support the subjected deposits for not assessee's income and prayed to dismiss the ground of appeal.

6. Heard both the parties and perused the material available on record. It is noted that the assessee is an authorized stamp vendor functioning under a valid licence issued by the District Registrar, Coimbatore vide Reference No. 16627/B1/95 dated 09.10.1995. We find copy of the same was reproduced by the Id. CIT(A) at page 5 of the

impugned order and the assessee is engaged in the same activity since 1995. It is brought to our notice the activities of the assessee as a stamp vendor, purchasing stamp papers from the Government Treasury and selling the same to the public for a fixed commission as per stamp rules. The assessee collects stamp duty and registration fees from the public on behalf of the registration department for online remittance through official Government portal. Further, it is noted that the assessee collects cash from the individuals/purchasers for the purpose of payment of stamp duty and registration charges and records the same in the stock register/ cash received register. The amounts collected are deposited into the assessee's two bank accounts i.e., State Bank of India and Indian Overseas Bank from which the amounts further remitted to Government Treasury through online portal. We find the list of persons from whom cash collected month-wise details i.e., April, 2018 to March, 2019 in paper book volume II consisting of 393 pages. Further, bank statement of SBI and IOB are placed at paper book volume III consisting of 218 pages. On perusal of the sample verification the transactions on 16.08.2018 at page 144 of the paper book II, we find that the assessee collected cash to an extent of ₹.5,630/- consisting of registration fee, EC additional and IC camera fee against the name of Kangamani, the corresponding deposits to Government account is placed at page 104 of the paper book III.

Further, against the name of Pasupathi at Sl. No. 18 in page 142 of the paper book volume II, we find that the assessee collected cash to an extent of ₹.1,081/- towards registration fee and the same was deposited to the Government account at page 105 of the paper book III. Likewise, we find that the assessee depositing the cash collected from the individual into the Government account on the same day itself, which amply proves that there is no mismatch of dates and amounts as held by the Assessing Officer. Further, it establishes that the assessee is only an agent of money for Tamil Nadu State Registration Department, but, not the owner of the money. All the evidence as placed on record vide paper books were examined by the Assessing Officer under remand proceedings and the Id. CIT(A) examined the remand report, held that the assessee clearly discharged the onus of proving the nature and source of cash, therefore, we find no infirmity in the findings of the Id. CIT(A) vide para 5.1.2 in pages 9 to 13 of the impugned order and accordingly it is justified. Thus, the sole ground raised by the Revenue is dismissed.

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7. In view of our decision in Revenue's appeal in the aforementioned paras, wherein, we upheld the findings of the Id. CIT(A) in deleting the addition made by the Assessing Officer under section 69A of the Act, the

sole ground raised by the assessee in the CO becomes academic and infructuous and accordingly dismissed.

8. In the result, the appeal filed by the Revenue and the CO filed by the assessee are dismissed.

Order pronounced on 04<sup>th</sup> December, 2025 at Chennai.

Sd/-  
(JAGADISH)  
ACCOUNTANT MEMBER

Sd/-  
(S.S. VISWANETHRA RAVI)  
JUDICIAL MEMBER

Chennai, Dated, 04.12.2025

Vm/-

आदेश की प्रतिलिपि अग्रेषित/Copy to:

1. अपीलार्थी/Appellant,
2. प्रत्यर्थी/ Respondent,
3. आयकर आयुक्त/CIT, Chennai/Madurai/Coimbatore/Salem
4. विभागीय प्रतिनिधि/DR &
5. गार्ड फाईल/GF.