

**IN THE INCOME TAX APPELLATE TRIBUNAL
SURAT "SMC" BENCH, SURAT
BEFORE DR. B.R.R. KUMAR, VICE-PRESIDENT
AND MS. SUCHITRA KAMBLE, JUDICIAL MEMBER**

I.T.A. No.1334/SRT/2024
(Assessment Year: 2017-18)

Dharmendrasinh Ranjit Chavda, Afwa, Bardoli, Haripura, B.O. Bamni, Surat-394620 PAN : ALBPC0326K	Vs.	The ITO, Ward-1, Bardoli
(Appellant)	..	(Respondent)
Appellant by :	Ms. Himali Mistry, C.A.	
Respondent by:	Ms. Namita Patel, Sr. D.R.	
Date of Hearing	20.01.2026	
Date of Pronouncement	23.01.2026	

ORDER

PER SUCHITRA KAMBLE, JUDICIAL MEMBER:-

This is an appeal filed against the order dated 20-01-2024 passed by National Faceless Appeal Centre (NFAC), Delhi for assessment year 2017-18.

Delay condoned.

2. The assessing officer made addition of Rs. 12,90,000/- u/s. 68 of the Act related to cash deposits during demonetization period. The assessee has given the bank statement before the A.O. as well as before the CIT(A) explaining details of cash withdrawals prior to demonetisation along with the cash deposits from time to time. Before us, the assessee also gave the cash flow statement of the said withdrawals and cash deposits alongwith

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bank statement. Before us, the assessee submitted the cash withdrawal certificate issued by Bank of India as well as confirmation letters from his brothers. The assessee also gave the details of Kisan Credit Card (KCC) loan repayment for which the assessee made cash deposits prior to demonetization as well. Therefore, we hold that the addition does not sustain.

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

The order is pronounced in the open Court on 23.01.2026

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

**Sd/-
(SUCHITRA KAMBLE)
JUDICIAL MEMBER**

Surat; Dated 23/01/2026

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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,अधिकरण अपीलीय आयकर ,/DR,ITAT, Surat,
6. गार्ड फाईल / **Guard file.**

आदेशानुसार/ **BY ORDER,**

सहायक पंजीकार (**Asstt. Registrar**)
आयकर अपीलीय अधिकरण
ITAT, Surat