

**IN THE INCOME TAX APPELLATE TRIBUNAL  
DELHI BENCH 'SMC', NEW DELHI**

**Before Sh. Satbeer Singh Godara, Judicial Member**

**ITA No. 2623/Del/2022 : Asstt. Year: 2017-18**

Geetu Kamra, C-98, Suraj Mal Vihar, New Delhi-110092 (APPELLANT)	Vs	Income Tax Officer, Ward-58(6), New Delhi-110002 (RESPONDENT)
<b>PAN No. AOLPK3958A</b>		

**Assessee by: Ms. Khushi Bansal, AR  
Revenue by : Sh. Manoj Kumar, Sr. DR**

<b>Date of Hearing: 20.01.2026</b>	<b>Date of Pronouncement: 20.01.2026</b>
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**ORDER**

This assessee's appeal for Assessment Year 2017-18 arises against the CIT(A)/NFAC, Delhi's DIN & order No. ITBA/NFAC/S/250/2022-23/1045039937(1) dated 30.08.2022, in proceedings u/s 143(3) of the Income Tax Act, 1961 (in short "the Act").

2. Heard both the parties at length. Case file perused.
3. Coming to the impugned addition of the assessee's cash deposits during demonetization amounting to Rs.32,18,000/- made by both the learned lower authorities in their respective findings in assessment order dated 04.12.2019 and upheld in the lower appellate discussion, it is noticed from a perusal of the case records that she had returned an income of Rs.3,13,460/. She is further stated to be engaged in trading

business of ornaments etc. since February, 2016 as well. This assessee's business activity does not seem to be in dispute in principle at least in the impugned assessment year.

4. Faced with this situation and in the larger interest of justice, it is deemed appropriate that a lump sum addition of Rs.3,20,000/- in the assessee's hands would be just and proper with a rider that the same shall not be treated as a precedent. It is made clear that the tribunal has estimated the impugned addition which shall be assessed at normal business income. Necessary computation shall follow as per law.

5. So far as assessee's assessment under Section 115BBE is concerned, I quote S.M.I.L.E Microfinance Limited Vs. The ACIT CC-1 in W.P.(MD) No.2078 of 2020 & W.M.P. (MD) No. 1742 of 2020 held that the said provision applied for transactions done on or after 01.04.2017 only. The assessee is accordingly directed to be assessed under normal provisions only.

6. This assessee's appeal is partly allowed.

Order Pronounced in the Open Court on 20/01/2026.

Sd/-  
**(Satbeer Singh Godara)**  
**Judicial Member**

**Dated: 20/01/2026**

\*Subodh Kumar, Sr. PS\*

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1. Appellant
2. Respondent
3. CIT
4. CIT(Appeals)
5. DR: ITAT

**ASSISTANT REGISTRAR**