

आयकर अपीलीय अधिकरण, चण्डीगढ़ न्यायपीठ, चण्डीगढ़  
IN THE INCOME TAX APPELLATE TRIBUNAL  
DIVISION BENCH, 'B' CHANDIGARH

BEFORE SHRI RAJPAL YADAV, VICE PRESIDENT AND  
SHRI MANOJ KUMAR AGGARWAL, ACCOUNTANT MEMBER

आयकर अपील सं./ ITA No. 208/CHD/2025

निर्धारण वर्ष / Assessment Year: 2018-19

Sohan Lal Walia, M/s Walia Enterprises, Ner Chowk, Balh, Mandi (HP).	Vs	The ITO, Mandi.
स्थायी लेखा सं./PAN NO: ABLPW2185L		
अपीलार्थी/Appellant		प्रत्यर्थी/Respondent

Assessee by : Shri Munish Sood, CA

Revenue by : Smt. Yamini, CIT DR

Date of Hearing : 04.02.2026

Date of Pronouncement : 09.02.2026

**HYBRID HEARING**

**ORDER**

**PER RAJPAL YADAV, VP**

The assessee is in appeal against the order of Id. Commissioner of Income Tax (Appeals) [in short 'the CIT (A)'] dated 17.12.2024 passed for assessment year 2018-19.

2. Though the assessee has taken six grounds of appeal but his grievance revolves around a single issue, namely,

on account of a mistake committed by the Bank, a single transaction has been added repetitively to the total income of the assessee.

3. The brief facts of the case are that assessee has filed his return of income electronically on 18.09.2018 declaring total income of Rs.4,66,890/-. His case was selected to limited scrutiny. According to the AO, it is discernable that assessee has made a huge deposit of Rs.8.94 Cr in the name of Walia Enterprises and Sohan Lal Walia in Punjab National Bank. The case of the assessee is that he is a dealer of Idea Cellular. Most of the business was done in cash. His turnover is only Rs.1,54,40,710/- on which he has earned commission income. The bank has multiplied this transaction which has indicated this huge deposit. But, without verifying these aspects, the AO has finalized the assessment and made the addition of Rs.8,94,80,550/-.

4. Appeal to the ld. CIT (Appeals) did not bring any relief to the assessee.

5. During the course of hearing, ld. counsel for the assessee has submitted annexures wherein he has

demonstrated as to how bank has issued a certificate correcting all these errors. He also filed Form 26AS.

6. With the assistance of Id. Representative, we have gone through the record carefully. Though a huge demand has been raised against the assessee on account of alleged unexplained deposits but it is pertinent to note that complete documents have not been filed by the assessee before the authorities below. According to the Id. counsel for the assessee, he was in the process of collecting all these documents and could not submit them in time. Considering this new evidence, first time brought before the Tribunal, we deem it appropriate to set aside both the impugned orders and restore this issue to the file of AO for verification of these documents, most particularly, the certificate issued by the bank that assessee has not deposited Rs.8.94 Cr in the bank as alleged by the AO. Accordingly, we set aside both the orders and restore these issues to the file of AO who will re-examine all these details and re-determine the income of the assessee. The assessee will be at liberty to

file any evidence before the AO in support of his explanation.

7. In view of the above, appeal of the assessee is allowed for statistical purposes.

Order pronounced on 09.02.2026.

**Sd/-**

**(MANOJ KUMAR AGGARWAL)  
ACCOUNTANT MEMBER**

**Sd/-**

**(RAJPAL YADAV)  
VICE PRESIDENT**

“Poonam”

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

1. अपीलार्थी/ The Appellant
2. प्रत्यर्थी/ The Respondent
3. आयकरआयुक्त/ CIT
4. विभागीय प्रतिनिधि, आयकर अपीलीय आधिकरण, चण्डीगढ़/ DR, ITAT, CHANDIGARH
5. गार्डफाईल/ Guard File

सहायक पंजीकार/ Assistant Registrar