

आयकर अपीलीय अधिकरण, 'बी' न्यायपीठ, चेन्नई
IN THE INCOME-TAX APPELLATE TRIBUNAL 'B' BENCH, CHENNAI
श्री एस.एस. विश्वनेत्र रवि, न्यायिक सदस्य एवं श्री एस.आर. रगुनाथा, लेखा सदस्य के समक्ष
Before Shri S.S. Viswanethra Ravi, Judicial Member &
Shri S.R. Raghunatha, Accountant Member

आयकर अपील सं./I.T.A. No.3796/Chny/2025
निर्धारण वर्ष/Assessment Year: 2018-19

Chinnamedu Primary Agril. Co-op.
Credit Society, JJ708, Chinnamedu
Village, Chinnamedu Post, Ponneri
Taluka, Thiruvallur 601 206.

Vs. The Income Tax Officer,
Ward 1,
Thiruvallur.

[PAN:AABAJ1447N]

(अपीलार्थी/Appellant)

(प्रत्यर्थी/Respondent)

अपीलार्थी की ओर से / Appellant by : Shri S. Vignesh, C.A.
प्रत्यर्थी की ओर से/Respondent by : Ms. Gouthami Manivasagam, JCIT
सुनवाई की तारीख/ Date of hearing : 17.02.2026
घोषणा की तारीख /Date of Pronouncement : 25.02.2026

आदेश / O R D E R

PER S.S. VISWANETHRA RAVI, JUDICIAL MEMBER:

This appeal filed by the assessee is directed against the order dated 13.10.2025 passed by the Id. Commissioner of Income Tax (Appeals), National Faceless Appeal Centre [NFAC], Delhi for the assessment year 2018-19.

2. At the outset, we note that the Assessing Officer denied withdrawal of cash from Kanchipuram Cooperative Bank to an extent of

₹.1,67,42,000/- and completed the assessment vide his order dated 30.03.2023 passed under section 147 of the Income Tax Act, 1961 ["Act" in short], which were challenged before the Id. CIT(A), wherein, he confirmed the order of the Assessing Officer in the absence of any documentary evidence or explanations filed by the assessee.

3. After hearing both the parties, upon perusing material on record and considering the undertaking brought on record by the Id. AR Shri S. Vignesh, C.A., we deem it proper to remand the matter to the file of the Assessing Officer subject to the condition of payment of ₹.50,000/- in favour of the State Legal Aid Authority, Hon'ble High Court of Madras within 30 days from the date of receipt of this order and the Assessing Officer shall satisfy the payment of cost and decide the issue afresh after considering the written submissions/ documentary evidences as may be filed by the assessee to substantiate its claim. In any case, the assessee fails to appear before the assessing authority, it is open to the Assessing Officer to complete the assessment based on the material available on record and to pass order in accordance with law. Thus, the grounds raised by the assessee are allowed for statistical purposes.

4. In the result, the appeal filed by the assessee is allowed for statistical purposes.

Order pronounced on 25th February, 2026 at Chennai.

Sd/-
(S.R. RAGHUNATHA)
ACCOUNTANT MEMBER

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

Chennai, Dated, 25.02.2026

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.