

**आयकर अपीलीय अधिकरण, चण्डीगढ़ न्यायपीठ “एकल” चण्डीगढ़
IN THE INCOME TAX APPELLATE TRIBUNAL, CHANDIGARH
BENCH “SMC” CHANDIGARH**

**श्री संजय गर्ग, न्यायिक सदस्य
BEFORE: SH. SANJAY GARG, JUDICIAL MEMBER**

आयकर अपील सं./ ITA No.579/CHD/2025
निर्धारण वर्ष / Assessment Year : 2017-18

Chauntra Service Co-operative Society Limited, Kohra, Sanithal Joginder Nagar, Mandi.	बनाम	The ITO, Ward, Mandi.
स्थायी लेखा सं./PAN NO: AAHFC7914Q		
अपीलार्थी/Appellant		प्रत्यर्थी/Respondent

निर्धारिती की ओर से/Assessee by : Shri Ashwani Kumar, CA and
Ms. Deepali Aggarwal, CA
राजस्व की ओर से/ Revenue by : Shri Vivek Vardhan, Addl. CIT, Sr.DR

सुनवाई की तारीख/Date of Hearing : 04.11.2025
उद्घोषणा की तारीख/Date of Pronouncement : 06.11.2025

HYBRID HEARING

आदेश/ORDER

The present appeal has been preferred by the assessee against the order dated 31.03.2025 of the Commissioner of Income Tax (Appeals) Addl./JCIT(A)-2, Gurgaon [in short ‘the CIT (Appeals)] pertaining to 2017-18 assessment year.

2. The assessee in this appeal has taken the following grounds of appeal :

1. *That order passed it's 250 of the Income Tax Act, S96I by (he Learned Addl. Commissioner of Income Tax (Appeals)-2, Gurugram is against law and facts on the file in as much as Learned CIT(Appeal) was not justified to uphold the addition of Rs. 12,00.000'- made by the Learned Assessing Officer on account of cash deposited during demonetization period.*

2. *That the Learned CIT(A) gravely cited in upholding the addition of Rs. 4,14,248/- made by the Learned Assessing Officer which actually pertains to provisions made in the balance sheet.*

3. At the outset, the ld. counsel for the assessee has stated at bar that he does not press ground No.2 of appeal, therefore, ground No.2 of the appeal is dismissed as not pressed.

4. So far as the addition made by the lower authorities of Rs.12 lacs on account of amount received by the assessee from its members is concerned, the receipt of the amount from members has not been doubted by the Assessing Officer. The only allegation is that the amount was received on 15.11.2016 i.e. during demonetization period. The assessee may have violated the Circular/Notification issued by the Government by accepting the demonetized currency but it is not a case of unexplained income of the assessee. The source of the deposits has not been doubted by the lower authorities, therefore the impugned addition is not

sustainable and the same is, accordingly, ordered to be deleted.

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

Order pronounced on 06th November, 2025.

Sd/-

(संजय गर्ग)

(SANJAY GARG)

न्यायिक सदस्य/ Judicial Member

“Poonam”

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

1. अपीलार्थी/ The Appellant
2. प्रत्यर्थी/ The Respondent
3. आयकर आयुक्त/ CIT
4. आयकर आयुक्त (अपील)/ The CIT(A)
5. विभागीय प्रतिनिधि, आयकर अपीलीय आधिकरण, चण्डीगढ़/ DR, ITAT, CHANDIGARH
6. गार्ड फाईल/ Guard File

Assistant Registrar