

Mangadu Natarajan Balasundharam

ITA No.2414/Chny/2025

ITAT • Chennai | Source extract brief | 7 source pages

Selected passages, not a complete analytical case note. Read the complete source for context and attribution.

01 FACTS OF THE CASE

"This appeal by the assessee is against the order of the Commissioner of Income Tax (Appeals)/National Faceless Appeal Centre (NFAC), Delhi, (in short "CIT(A)") passed u/s. 250 of the Income Tax Act, 1961 (in short "the Act") dated 28.07.2025 for Assessment Year (AY) 2016-17. 2. The assessee is an individual and filed the return of income for AY 2016-17 on 14.10.2016 declaring taxable income of Rs.10,82,190/-. The A.O received information from DDIT(Investigation) that the assessee has not offered the income from sale of plots co-owned by him along with two others." (source PDF page 1)

02 DISCUSSION BY THE HON'BLE TRIBUNAL

"We have heard the parties, and perused the material available on record. The A.O reopened the assessment for the reason that the assessee has not offered the income arising from sale of a plot of land during the year under consideration. The assessee filed return in response to notice u/s.148 of the Act wherein the assessee has included the LTCG arising from the sale of land. The AO while completing the assessment u/s.148 accepted the income returned by the assessee without making any other additions/disallowances. The AO subsequently levied penalty u/s.271(1)(c) stating that there is a concealment of income towards LTCG not declared ..." (source PDF page 4)

03 JUDICIAL DECISION

"In the result, the appeal of the assessee is allowed." (source PDF page 7)

04 OUTCOME — IN FAVOUR OF

Assessee, for the issues disposed of in the quoted result. Check the full reasoning for whether relief is substantive or procedural, and verify subsequent proceedings before relying on it.

05 AKHB REVIEW POINT

Read the numbered grounds and operative reasoning together. Match the statutory provision, assessment year, jurisdiction and material facts before relying on this order; check later appeals, stays and amendments.

SOURCE & VERIFICATION

[Read the supplied court / tribunal copy \(PDF\)](#)

Page references refer to the supplied PDF, not an official reporter. Authenticity and subsequent case history require separate verification.

AI DISCLOSURE

AI-assisted source extract brief. Selection and extraction may contain errors or omit material context. The selected discussion passage may include a precedent quoted within the order. No independent professional approval is claimed. Verify the attribution, complete reasoning and every material statement against the original.

PROFESSIONAL DISCLAIMER

General research information only; not legal or tax advice, a certified judgment or a substitute for the full order. Applicability depends on facts, statutory version, assessment year and jurisdiction. Subsequent appeals, stays, reversals and amendments have not been checked. Downloading does not create a professional engagement. Obtain case-specific advice before reliance.