GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE INCOME TAX OFFICER
WARD 16(4),HYDERABAD

To, SOHAM SATISH MODI 5-4-187/3 AND 4, 3RD FLOOR SOHAM MANSION, M.G ROAD SECUNDERABAD 500003,Telangana India	

PAN:	AY:	DIN & Order No:	Dated:
ABMPM6725H	**2017-18**	**ITBA/AST/S/143(3)/2019-20/1023253096(1)**	**27/12/2019**

Name of the assessee	**SOHAM SATISH MODI**
Address of the assessee	**5-4-187/3 AND 4, 3RD FLOOR SOHAM MANSION, M.G ROAD, SECUNDERABAD 500003, Telangana, India**
Status	**INDIVIDUAL**
Range/Circle/Ward	**WARD 16(4),HYDERABAD**
Resident/Resident but not Ordinary resident/ Non-resident	**Resident**
Date of Hearing	**27/09/2018, 11/01/2019, 18/03/2019, 18/03/2019, 22/05/2019, 13/08/2019, 20/08/2019, 14/10/2019, 22/11/2019**
Section/Sub-section under which assessment is made	**143(3)**
Date of Order	**27/12/2019**

ASSESSMENT ORDER

The assessee is an individual and filed his return of income for the Asst. year 2017-18 on 28/10/2017, admitting total income of Rs.12,44,670/-. The case was selected for scrutiny by issuing of notice u/s 143(2) dated 24/09/2018 and the same was duly served on the assessee. Subsequently information was called u/s 142(1) from assessee. In response to the notices issued, the assessee has uploaded the information in ITBA. Based on the information and documents furnished by the assessee and the same were examined and the assessment is completed as under:

2. Income received from M/s B and C Estates:-

As per the tax credit certificate in form 26AS an amount of Rs.1,05,486/- is received by the assessee, where TDS was deducted u/s 194C. While going through the return of income filed by the assessee, it is found that the income received from M/s B and C Estates during the previous year is not offered to tax. Thus the amount of Rs.1,05,486/- is added to the income returned.

Addition of Rs.1,05,486/-

3. Commission received from M/s Paramount Builders:-

As per the tax credit certificate in form 26AS an amount of Rs.28,233/- is received by the assessee, where TDS was deducted u/s 194H. While going through the return of income filed by the assessee, it is found that income received from M/s Paramount Builders during the previous year is not offered to tax. Thus the amount of Rs.28,233/- is added to the income returned.

Addition of Rs.28,233/-

4. Interest paid to the creditors:-

As per the details furnished by the assesse, the total debtors at the end of year are found for Rs.5,65,83,334/- and for the year they paid interest of Rs.70,80,082/- to the assessee. On the other hand creditors are amounting to Rs.4,19,05,120/- and interest paid to the concerned parties amounts to Rs.70,07,802/-. Out of the interest payments and interest receipts, the assesse has paid an amount of Rs.70,07,802/- to earn the interest of Rs.70,80,082/- despite the considerable higher amount is with the debtors than that with the creditors. In view of such huge claim of interest expenditure, the assesse was asked to produce the details of rate of interest and party-wise break-up in the following pattern, vide this office notices dated 22/05/2019 and 06/08/2019.

Name & PAN of the party(debtors)	Amount of Interest received	Rate of Interest received	Advance balance as on 01-04-2016	Advance balance as on 31-03-2017

Total	Rs.70,80,082			

Name & PAN of the party(creditors)	Amount of Interest Paid	Rate of Interest paid	Loan balance as on 01-04-2016	Loan balance as on 31-03-2017
Total	Rs.70,06,922			

Further, several notices were issued for the same details along with the other details. Despite several notice over a period of 7 months, the assesse has not filed the details of party-wise rate of interest. The assesse has furnished only amount of interest paid to various parties without disclosing the rate.

In absence of details such as party-wise rate of interest paid and received, opening and closing balances etc., and under the above facts & circumstances the interest expenditure is allowed proportionately on the closing balances of the debtors and creditors, which are available on record. As per the details furnished, the assessee shown the closing balances of Rs. 5,65,83,334/- and Rs. Rs.4,19,05,120/- for debtors and creditors. Against such debtors and creditors, the assessee has shown the interest of Rs. 70,80,082/- to have received and interest of Rs. 70,06,922/- to have paid. Thus the assessee has received interest of Rs. 70,80,082/- out of the debtors for Rs. 5,65,83,334/- and where as he has paid the interest of Rs. Rs. 70,06,922/- to the creditors for Rs.4,19,05,120/-. In view of this the interest expenditure is allowed proportionately on the basis of the closing balances of debtors.

The assessee has received interest of Rs.70,80,082/- against the debtor balance of Rs.5,65,83,334/-. On the same proportion the interest payable works out to Rs.52,43,446/- on the credit balance of Rs.4,19,05,120/-

Hence the interest can be allowed to the extent of Rs.52,43,446/- and the excess claim of Rs.17,64,3556/- is disallowed and added to the income returned.

Disallowance of Rs.17,64,356/-

4. Subject to the above the total income of the Assessee and tax there on are computed as under:-

Total Income Returned	Rs. 12,44,670/-
Add: As per Para-2	Rs. 1,05,486/-
Add: As per Para-3	Rs. 28,233/-
Add: As per Para-2	Rs. 17,64,356/-
Total Income assessed	**Rs. 31,42,745/-**

GULBARGA KRISHNAA RAO DEGEKAR
WARD 16(4),HYDERABAD

Copy to:

Assessee

GULBARGA KRISHNAA RAO DEGEKAR
WARD 16(4),HYDERABAD

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Date: Friday, De 27, 2019 7:56 PM
Location: HYDERA , India

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MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE INCOME TAX OFFICER
WARD 16(4),HYDERABAD

Computation Sheet

General Details			
PAN	ABMPM6725H	**Assessment Year**	2017-18
Name	SOHAM SATISH MODI	**Address**	5-4-187/3 AND 4, 3RD FLOOR SOHAM MANSION ,M.G ROAD SECUNDERABAD 500003 ,Telangana India
Residential Status	Resident	**Order Section**	143(3)
Document Number	ITBA/AST/S/213/2019-20/1023265396(1)	**Order Date**	27/12/2019

Sl. No.	Reporting Heads	Amount as per Current Order (in Rs.)
	HEADS OF INCOME	
1.	INCOME FROM SALARY	12,00,000
2.	INCOME FROM HOUSE PROPERTY	47,982
3.	INCOME FROM BUSINESS OR PROFESSION	18,98,074
4.	INCOME FROM CAPITAL GAINS	0
5.	INCOME FROM OTHER SOURCES	73,160
6.	INTRA HEAD ADJUSTMENTS	0
7.	TOTAL (AFTER INTRA HEAD ADJUSTMENT) 7=(1+2+3+4+5)-6	32,19,216
8.	LOSSES OF CURRENT YEAR SETOFF AGAINST 7	0
9.	BROUGHT FORWARD LOSSESS SET OFF AGAINST (7-8)	0
10.	GROSS TOTAL INCOME 10=7-(8+9)	32,19,216
11.	(I) INCOME CHARGEABLE TO TAX AT SPECIAL RATE UNDER SECTION 115BBE	0
	(II) INCOME CHARGEABLE TO TAX AT SPECIAL RATE OTHER THAN 115BBE INCLUDING SECTION 111A, 112 ETC.	0
12.	DEDUCTION U/S 10A or 10AA	0

	DEDUCTIONS UNDER CHAPTER VI A	
13.	TOTAL DEDUCTIONS UNDER CHAPTER (VIA)	76,477
14.	TOTAL INCOME AFTER DEDUCTIONS 14 =(10-12-13)	31,42,740
15.	NET AGRICULTURAL INCOME/ ANY OTHER INCOME FOR RATE PURPOSE	0
16.	AGGREGATE INCOME	31,42,740
17.	LOSS OF CURRENT YEAR TO BE CARRIED FORWARD	0
	TAX DETAILS	
18.	TAX PAYABLE ON DEEMED TOTAL INCOME UNDER SECTION 115JC	0
19.	SURCHARGE(ON 18)	0
20.	EDUCATION CESS(SECONDARY & HIGHER) ON (18+ 19)	0
21.	TOTAL TAX PAYABLE ON DEEMED TOTAL INCOME (18+19+20)	0
22.	TAX ON NORMAL INCOME	7,67,822
23.	(I) TAX ON 115BBE	0
	(II) TAX ON SPECIAL INCOME OTHER THAN SECTION 115BBE	0
24.	REBATE ON AGRICULTURAL INCOME	0
25.	TAX PAYABLE ON TOTAL INCOME (25=22+23-24)	7,67,822
26.	REBATE U/S 87A	0
27.	TAX PAYABLE AFTER REBATE (27=25-26)	7,67,822
28.	SURCHARGE ON 27 ABOVE	
	(i) 25% OF TAX ON DEEMED INCOME CHARGEABLE U/S 115BBE	0
	(ii) ON [(27) – (TAX ON DEEMED INCOME CHARGEABLE U/S115BBE)]	0
	(iii) TOTAL (i + ii)	0
29.	EDUCATION CESS(SECONDARY & HIGHER) ON (27+ 28)	23,035
30.	GROSS TAX LIABILITY 30=(27+28+29)	7,90,857
31.	GROSS TAX PAYABLE (HIGHER OF 21 AND 30)	7,90,857
32.	CREDIT UNDER SECTION 115JD OF TAX PAID IN EARLIER YEARS.	0
33.	TAX PAYABLE AFTER CREDIT UNDER SECTION 115JD 33=(31-32)	7,90,857
	TAX RELIEF	
34.	RELIEF U/S 89	0
35.	RELIEF U/S 90/90A	0
36.	RELIEF U/S 91	0
37.	TOTAL TAX RELIEF 37=(34+35+36)	0
	TOTAL INCOME TAX LIABILITY	

38.	NET TAX LIABILITY 38=(33-37)	7,90,857
	INTEREST PAYABLE	
39.	FOR DEFAULT IN FURNISHING THE RETURN (SECTION 234A)	2,253
40.	FOR DEFAULT IN PAYMENT OF ADVANCE PAYMENT (SECTION 234 B)	24,783
41.	FOR DEFERMENT OF ADVANCE TAX (SECTION 234C)	0
42.	INTEREST U/S 234D	25,565
43.	TOTAL INTEREST PAYABLE 43=(39+40+41+42)	52,601
44.	AGGREGATE INCOMETAX LIABILITY 44=(38+43)	8,43,458
	PRE-PAID TAXES	
45.	TDS	7,15,662
46.	TCS	0
47.	ADVANCE TAX	0
48.	SELF ASSESSMENT TAX	0
49.	REGULAR TAX PAID	0
50.	TOTAL TAXES PAID 50=(45+46+47+48+49)	7,15,662
	TAX PAYABLE/REFUND	
51.	AMOUNT PAYABLE/ REFUND AMOUNT 51=(44-50)	1,27,796
52.	INTEREST U/S 244A ON CURRENT AMOUNT	0
53.	TOTAL AMOUNT PAYABLE/ REFUND AMOUNT 53= (51+52)	1,27,796
54.	REFUND ALREADY ISSUED (incl. interest u/s 244A)	-5,57,326
55.	BALANCE AMOUNT PAYABLE/REFUNDABLE (incl. provisional Interest u/s 244A till current order - if any) 55 = (53-54)	6,85,122
56.	INTEREST U/S 220(2) CHARGED (In Rs.)	0
57.	AMOUNT PAYABLE/ REFUNDABLE 57=(55+56)	6,85,122
58.	DEMAND IDENTIFICATION NO AGAINST ORIGINAL DEMAND	2019201737087691505T

*In case of refund, Refund Intimation cum Adjustment sheet will be issued subsequently and separate communication will be sent for the same.

GULBARGA KRISHNAA RAO DEGEKAR
WARD 16(4),HYDERABAD

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INCOME TAX DEPARTMENT

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WARD 16(4),HYDERABAD

To, SOHAM SATISH MODI 5-4-187/3 AND 4, 3RD FLOOR SOHAM MANSION, M.G ROAD SECUNDERABAD 500003,Telangana India	

PAN:	Date:	Status:	DIN & Notice No:
ABMPM6725H	**27/12/2019**	**INDIVIDUAL**	**ITBA/AST/S/156/2019-20/1022265250(1)**

Subject: Notice of demand under section 156 of the Income-Tax Act, 1961

1. This is to give you notice that for the assessment year **2017-18** a sum of **Rs. 6,85,122**, details of which are given on the reverse, has been determined to be payable by you.

2. The amount should be paid to the Manager, authorised bank/State Bank of India within 30 days of the service of this notice. A challan is enclosed for the purpose of Payment.

3. If you do not pay the amount within the period specified above, you shall be liable to pay simple interest at one per cent for every month or part of a month from the date commencing after the end of the period aforesaid in accordance with section 220(2).

4. If you do not pay the amount of the tax within the period specified above, penalty (which may be as much as the amount of tax in arrear) may be imposed upon you after giving you a reasonable opportunity of being heard in accordance with section 221.

5. If you do not pay the amount within the period specified above, proceedings for the recovery thereof will be taken in accordance with sections 222 to 227, 229 and 232 of the Income-tax Act, 1961.

6. If you intend to appeal against the assessment, you may present an appeal under Part A of Chapter XX of the Income-tax Act, 1961, to the CIT (A), Hyderabad- 4 within thirty days of the receipt of this notice, in Form No. 35, duly stamped and verified as laid down in that form.

GULBARGA KRISHNAA RAO DEGEKAR
WARD 16(4),HYDERABAD

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,I T TOWER, AC Guards, Masab Tank, HYDERABAD, Andhra Pradesh, 500004
Email: HYDERABAD.ITO16.4@INCOMETAX.GOV.IN,

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