Date: 29-12-2023

To

ADIT (INT TAXN)-1, HYD
Income Tax Department
Aaykar Bhavan, Basheer Bagh
Hyderabad
Telangana – 500 004

From

Rajesh Kumar Jayantilal Kadakia
5-2-223, Gokul,3 rd Floor
Secunderabad
Telangana – 500 003

प्राप्त किया / RECEIVED
दि. / Date 2/01/24
संयुक्त/अपर आयकर आयुक्त (अंत.करा.)
Joint /Addl. CIT (International Taxation)
हैदराबाद / Hyderabad.

Respected Sir/Madam,

Sub: Request for issue of refund against wrongful adjustment of taxes for AY 2020-21- PAN AERPK6958C - in my own case – Reg.

Ref:

1. 143(3) order dated 25/05/2022 vide DIN: ITBA/COM/F/17/2022-23/1043165019(1) for AY 2020-21
2. Copy of rectification request under Sec 154 dated 20/06/2022
3. 143(1) intimation for AY 2022-23 dated 04-10-2022 vide DIN: CPC/2223/A2/307348828

With reference to the above cited, I want to make the following submissions:

1. Return of Income was filed for AY 2020-21 vide Ack No. 815576431141220 on 14-12-2020 declaring a Total Income of Rs 2,08,73,740/- and a refund of Rs 46,80,200/- was claimed. (Copy enclosed as **Annexure-1**)

2. Return was taken up for processing and an intimation under Sec 143(1) was issued on 23/01/2021 vide DIN: CPC/2021/A2/140643683 determining a Total refund due of Rs 48,57,300/-(Rs 46,80,200 claimed in ITR plus interest u/s 244A of Rs 1,77,099/-). The said refund was issued and received by me on 08/02/2021. (Copy enclosed as **Annexure-2**)

3. Subsequently the return was selected for scrutiny and an order u/s 143(3) was issued on 25/05/2022 vide DIN: ITBA/COM/F/17/2022-23/1043165019(1) making an addition of Rs 13,33,538/-. (Copy enclosed as **Annexure-3**)

4. While passing the above cited order refund of Rs 40,79,026/- was determined and a notice of demand under Sec 156 dated 25/02/2022 was issued determining **NIL TAXES** as payable. (Copy enclosed as **Annexure-4**). It appears that while passing such order and demand notice the refund already issued was not taken into consideration.

5. Upon receipt of the above cited order and noticing the mistake apparent on record a rectification petition under Sec 154 was filed before your good offices on 20/06/2022. (Copy enclosed as **Annexure-5**). In this letter a fresh computation of tax was done based on the assessment order received earlier and an amount of Rs 6,01,174/- (i.e., Rs 5,56,646/- + Rs 44,528/- of interest u/s 234D) was admitted as amount payable. This amount was paid on 16/02/2022 vide Challan No.10926(Copy enclosed as **Annexure-6**). No order under 154 is received as on this date.

6. Subsequently, an order u/s 270A for levying penalty was issued dated 27/03/2023 vide DIN: ITBA/PNL/F/270A/2022-23/1051436439(1) determining an amount of Rs 2,60,040/- as the penalty payable. (Copy enclosed as **Annexure-7**). The said penalty of Rs 2,60,040/- along with Interest of Rs 7,800/- totalling to Rs 2,67,840/- was paid on 24/07/2023 vide Challan No.10008 (Copy of the challan is enclosed as **Annexure-8**).

7. It is therefore submitted that in relation to AY 2020-21 all taxes along with interest and penalties have been fully paid and nothing is due.

8. However, I am in receipt of an intimation u/s 143(1) for AY 2022-23 dated 04-10-2022 vide DIN: CPC/2223/A2/307348828 wherein the refund of Rs 1,22,55,240/- (tax of Rs 1,19,67,080 plus interest on refund u/s 244A of Rs 4,18,845/- less applicable TDS of Rs 1,30,680/-) is proposed to be adjusted against the demand outstanding of Rs 1,33,99,229/- for AY 2020-21 vide demand reference No **2022202040411527465T**. (Copy of intimation order enclosed as **Annexure-9**).

9. As per the above cited intimation order the demand is due against order passed under Sec 143 by ITBA dated 30/09/2022. It is submitted that I am completely unaware of any such order being issued against me. The only 143 order which was issued was on 25/05/2022 vide DIN: ITBA/COM/F/17/2022-23/1043165019(1) as stated above and all taxes along with applicable interest and penalty has already been paid as explained in preceding points. We have approached your good offices personally on couple of occasions requesting for copy of the alleged 143 order dated 30/09/2022. However, we are given to understand from your office that no such order exists even in your records.

10. Accordingly, a response to outstanding demand was submitted on 20/10/2022 vide Transaction ID: FOS002734200565 disagreeing with the demand. (Copy of response enclosed as **Annexure-10**).

11. Without considering the facts of the case and the response submitted by me against the outstanding demand, my refund for AY 2022-23 has been wrongfully adjusted against the above demand.

12. It may further be noted that an amount of Rs 3,59,010 is determined as payable for AY 2022-23 vide order u/s 154 dated 13-07-2023 DIN CPC/2223/U2/336200948 on account of the above stated wrong demand. Once the error at your end for AY 2020-21 is rectified the same would become **NIL.**

13. I therefore, humbly request your good offices to kindly look into the facts of the case and issue the refund of Rs 1,22,55,240/- along with interest as may be accrued till the date of issue of refund. I also request that demands wrongfully created for AY 2022-23 may also be deleted.

14. As the amount involved is huge and is causing significant hardship to me, I humbly request your good offices to expedite the matter and resolve the same within 30 days failing which I shall be compelled to approach higher forums for necessary redressal.

Thanking you,

Yours faithfully,

For Rajesh Kumar Jayantilal Kadakia

A. Sambasiva Rao

(Authorised Signatory)

INDIAN INCOME TAX RETURN ACKNOWLEDGEMENT

[Where the data of the Return of Income in Form ITR-1 (SAHAJ), ITR-2, ITR-3, ITR-4(SUGAM), ITR-5, ITR-6, ITR-7 filed and verified]

(Please see Rule 12 of the Income-tax Rules, 1962)

Assessment Year 2020-21

PAN	AERPK6958C		
Name	RAJESH KADAKIA		
Address	5-2-223, GOKUL, 3RD FLOOR, OPP ANDHRA BANK, DISTILLERY ROAD, SECUNDERABAD, Telangana, 500003		
Status	Individual	**Form Number**	ITR-2
Filed u/s	139(1)-On or before due date	**e-Filing Acknowledgement Number**	815576431141220

Taxable Income and Tax details	Current Year business loss, if any	1	0
	Total Income		20873740
	Book Profit under MAT, where applicable	2	0
	Adjusted Total Income under AMT, where applicable	3	20873740
	Net tax payable	4	7860440
	Interest and Fee Payable	5	0
	Total tax, interest and Fee payable	6	7860440
	Taxes Paid	7	12540643
	(+)Tax Payable /(-)Refundable (6-7)	8	-4680200
Dividend Distribution Tax details	Dividend Tax Payable	9	0
	Interest Payable	10	0
	Total Dividend tax and interest payable	11	0
	Taxes Paid	12	0
	(+)Tax Payable /(-)Refundable (11-12)	13	0
Accreted Income & Tax Detail	Accreted Income as per section 115TD	14	0
	Additional Tax payable u/s 115TD	15	0
	Interest payable u/s 115TE	16	0
	Additional Tax and interest payable	17	0
	Tax and interest paid	18	0
	(+)Tax Payable /(-)Refundable (17-18)	19	0

Income Tax Return submitted electronically on **14-12-2020 12:41:53** from IP address **124.123.174.162** and verified by **RAJESH KADAKIA** having PAN **AERPK6958C** on **14-12-2020 12:41:53** from IP address **124.123.174.162** using **Digital Signature Certificate (DSC).**

DSC details: **50623431CN=Capricorn CA 2014,2.5.4.51=#131647352c56494b415320444545502042554 94c44494e47,STREET=18\,LAXMI NAGAR DISTRICT CENTER,ST=DELHI,2.5.4.17=#1306313130303932,OU=Cert**

DO NOT SEND THIS ACKNOWLEDGEMENT TO CPC, BENGALURU

धारा 143(1) के तहत सूचना

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

नाम : राजेश कडकिया
पता : 5-2-223 गोकुल, 3र्द फ़्लोर, आंध्र बैंक के सामने डिस्टिल्लरी रोड, सिकन्दराबाद तेलंगना 500003 इंडिया
फ़ोन: 91-9121282859

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2020-21 | पत्र संदर्भ संख्या : CPC/2021/A2/140643683 | पावती सं. : 815576431141220

निर्धारण वर्ष 2020-21 के लिए आपके केस में प्रतिदाय निर्धारित हुआ है

प्रतिदाय की राशि:	₹ 48,57,300	प्रतिदाय अनुक्रम सं.:	9041524349

ITR फॉर्म का प्रकार	स्थिति	सूचना आदेश की दिनांक	फाइलिंग की दिनांक
ITR2 मूल	Individual	23/01/2021	14/12/2020

नियत दिनांक	विस्तारित नियत दिनांक
10/01/2021	10/01/2021

आयकर विवरणी का विवरण

क.सं.	विवरण	रिपोर्टिंग शीर्ष	राशि (₹ में) करदाता द्वारा प्रदान किया गया	राशि (₹ में) धारा 143(1) की गणना के अनुसार
01	आय का विवरण	कुल आय	2,08,73,740	2,08,73,740
02	कर का विवरण	राहत के बाद कर दायित्व	78,60,440	78,60,443
03	ब्याज और देय शुल्क	कुल ब्याज और शुल्क (234A, 234B, 234C और 234F)	0	0
04	पूर्व संदत्त कर	कुल भुगतान किया गया कर (अग्रिम कर, टी डी एस ,टी सी एस , स्व निर्धारित कर)	1,25,40,643	1,25,40,643
05	प्रतिदाय का विवरण	प्रतिदाय राशि (244A के ब्याज सहित)	46,80,200	48,57,300

एन साईंराज
सहायक आयकर निदेशक, सी.पी.सी.
बेंगलुरु

धारा 143(1) के तहत सूचना

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

नाम : राजेश कडकिया

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2020-21 | पत्र संदर्भ संख्या : CPC/2021/A2/140643683 | पावती सं. : 815576431141220

क्र.सं.	विवरण	रिपोर्टिंग शीर्ष	राशि (₹ में) करदाता द्वारा प्रदान किया गया	धारा 143(1) की गणना के अनुसार
01	आय के शीर्ष	वेतन	0	0
02		गृह संपत्ति से आय	2,06,19,772	2,06,19,772
03		पूंजीगत लाभ से प्राप्त आय	0	0
04		अन्य स्रोतों से आय	2,63,971	2,63,971
05		वर्तमान वर्ष की हानि के अंतरा शीर्ष समायोजन	0	0
06		कुल शीर्षवार आय [6=(1+2+3+4)-5]	2,08,83,743	2,08,83,743
07		6 के विरूद्ध वर्तमान वर्ष की हानि का समायोजन	0	0
08		वर्तमान वर्ष की हानि के समायोजन के बाद शेष (6-7)	2,08,83,743	2,08,83,743
09		8 के विरूद्ध आगे लाई गई हानि का समायोजन	0	0
10		कुल सकल आय [10=(8-9)]	2,08,83,743	2,08,83,743
11	विशेष आय	(i) धारा 115BBE के तहत विशेष दर पर कर प्रभार्य आय	0	0
		(ii) धारा 115BBE के अलावा विशेष दर पर कर प्रभार्य आय	0	0
12	अध्याय VI-A	अध्याय VI-A के तहत कुल कटौती	10,000	10,000
13		कुल आय [13= (10-12)]	2,08,73,740	2,08,73,740
14		ऐसी आय जो 13 में शामिल की गई हो तथा विशेष दरों पर कर प्रभार्य हो (अनुसूची SI के स्तम्भ (i) का योग)	0	0
15		दर प्रयोजन के लिए कुल कृषि आय/ कोई अन्य आय	0	0
16		कुल आय [16=(13-14+15)]	2,08,73,740	2,08,73,740
17		आगे ले जाई गयी वर्तमान वर्ष की हानि	0	0
18		धारा 115JC के तहत मान्य आय	2,08,73,740	2,08,73,740
19	कर का विवरण	16 पर सामान्य दरों पर कर	60,74,622	60,74,622
20		(i) 115BBE पर कर	0	0
		(ii) धारा 115BBE के अलावा	0	0
21		कृषि आय पर छूट	0	0
22		कुल	60,74,622	60,74,622
23		धारा 87A के तहत छूट	0	0
24		छूट के बाद देय कर [24=(22-23)]	60,74,622	60,74,622
25		अधिभार		
		(i) धारा 115BBE के तहत प्रभार्य आय पर कर का 25%	0	0
		(ii) अनुसूची SI के 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii) के अनुसार 10% या 15%	14,83,493	14,83,496
		(iii) [25 - (अनुसूची SI के 16(ii), 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii))] पर		
		(iv) कुल (i + ii +iii)	14,83,493	14,83,496
26		स्वास्थ्य और शिक्षा उपकर @ 4% की दर से [24+25(iv)] पर	3,02,325	3,02,325
27		सकल कर देयता [(27=24+25(iv)+26)]	78,60,440	78,60,443
28	कर राहत	धारा 89 के तहत राहत	0	0
29		धारा 90/90A के तहत राहत	0	0
30		धारा 91 के तहत राहत	0	0
31		कुल कर राहत [31=(28+29+30)]	0	0
32	कुल आयकर देय	कुल कर देय [32=(27-31)]	78,60,440	78,60,443

नाम : राजेश कडकिया

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2020-21 | पत्र संदर्भ संख्या : CPC/2021/A2/140643683 | पावती सं. : 815576431141220

क्र.सं.	विवरण	रिपोर्टिंग शीर्ष	राशि (₹ में) करदाता द्वारा प्रदान किया गया	धारा 143(1) की गणना के अनुसार
33	ब्याज और देय शुल्क	(a) धारा 234A के तहत ब्याज	0	0
		(b) धारा 234B के तहत ब्याज	0	0
		(c) धारा 234C के तहत ब्याज	0	0
		(d) धारा 234F के तहत शुल्क	0	0
		(e) कुल ब्याज और देय शुल्क [33e=(33(a)+33(b)+33(c)+33(d)]	0	0
34		कुल आयकर देय [34=(32+33e)]	78,60,440	78,60,443
35	पूर्व संदत्त कर	(a) अग्रिम कर	0	0
		(b) टी डी एस	1,25,40,643	1,25,40,643
		(c) टी सी एस	0	0
		(d) स्वत: निर्धारित कर	0	0
		(e) भुगतान किया गया कुल कर [35e={35(a)+35(b)+35(c)+35(d)}]	1,25,40,643	1,25,40,643
36	प्रतिदाय	प्रतिदाय राशि [36=(35e-34)]	46,80,200	46,80,200
37		करदाता को विलंब श्रेय (महीनों में)	N/A	0
38		धारा 244A के तहत प्रतिदाय पर ब्याज (क्रम संख्या 41 पर विचार करने के बाद क्रम संख्या 40 के तहत प्रतिदाय राशि पर)	N/A	1,77,099
39		धारा 244A के तहत भुगतान किए गए ब्याज पर टी डी एस की कटौती (क्रम संख्या 38 पर और केवल अनिवासी के लिए)	N/A	0
40		कुल आयकर प्रतिदाय [40=(36+38-39)]	N/A	48,57,300
41	धारा 220 (2) के तहत कुल बकाया मांग और ब्याज, प्रतिदाय राशि की समायोजित सीमा तक देय है।			0
42	प्रतिदाय योग्य कुल राशि 42=(40-41)			48,57,300

धारा 143(1) के तहत सूचना

CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

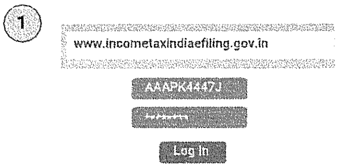
नाम : राजेश कडकिया

स्थायी खाता संख्या : **AERPK6958C** | निर्धारण वर्ष : **2020-21** | पत्र संदर्भ संख्या : **CPC/2021/A2/140643683** | पावती सं. : **815576431141220**

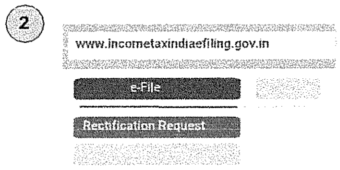
प्रतिदाय नोटः

1. आयकर अधिनियम,1961 की धारा 244A के तहत ब्याज की गणना हेतु प्रतिदाय जारी करने की तारीख शामिल की जाती है।
2. इस सूचना में निर्धारित प्रतिदाय तथा धारा 244A के तहत ब्याज, धारा 245 के तहत बकाया राशि के समायोजन के अधीन है।
3. आयकर विभाग की ओर से स्टेट बैंक ऑफ इंडिया (प्रतिदाय बैंक) द्वारा प्रतिदाय जारी किया जाता है। प्रतिदाय की स्थिति का विवरण वेबसाइट (www.tin-nsdl.com) पर "कर प्रतिदाय की स्थिति" के अंतर्गत प्राप्त किया जा सकता है। प्रतिदाय की प्राप्ति में किसी भी कठिनाई या विलंब के मामले में, या प्रतिदाय की स्थिति जानने के लिए स्टेट बैंक ऑफ इंडिया के कॉल सेंटर नंबर 18004259760 पर कॉल करें।
4. यदि इस सूचना के किसी भी भाग में सुधार करने की आवश्यकता है, तो आप आयकर अधिनियम 1961 की धारा 154 के तहत सुधार हेतु अनुरोध कर सकते हैं।

To file a Rectification Request



Log on to www.incometaxindiaefiling.gov.in with your PAN Number and Password.



Click on 'Rectification request' under 'e-File' tab.

Intimation u/s 143(1)

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KADAKIA
Address : 5-2-223 GOKUL, 3RD FLOOR, OPP ANDHRA BANK DISTILLERY ROAD, SECUNDERABAD Telangana 500003 INDIA
Ph : 91-9121282859

नाम: राजेश कडकिया
पता: 5-2-223 गोकुल, 3र्द फ़्लोर, आंध्र बैंक के सामने डिसटिल्लरी रोड, सिकन्दराबाद तेलंगना 500003 इंडिया
फ़ोन: 91-9121282859

PAN : AERPK6958C | AY : 2020-21 | DIN : CPC/2021/A2/140643683 | Ack. No. : 815576431141220

You have a Refund for A.Y. 2020-21

Amount of Refund :	₹ 48,57,300	Refund Sequence No :	9041524349

ITR Form Type	Status	Intimation Order Date	Date of Filing
ITR2 Original	Individual	23/01/2021	14/12/2020
Due Date	**Extended Due Date**		
10/01/2021	10/01/2021		

RETURN DETAILS

Sl.No.	Particulars	Reporting Heads	Amount in ₹ As provided by Taxpayer	Amount in ₹ As Computed u/s 143(1)
01	Income Details	Total Income	2,08,73,740	2,08,73,740
02	Tax Details	Tax Liability after relief	78,60,440	78,60,443
03	Interest and Fee Payable	Total Interest And Fee (234A, 234B, 234C & 234F)	0	0
04	Pre-paid Taxes	Total Taxes Paid (Advance Tax, TDS, TCS, Self Assessment Tax)	1,25,40,643	1,25,40,643
05	Refund Details	Refund Amount (Including 244A interest)	46,80,200	48,57,300

Signature Not Verified
Digitally signed by SAIRAJ N
Date: 2021.02.04 17:18:30 IST
Reason: Digitally Signed
Location: Banglore

N SAIRAJ

Asst. Director of Income Tax, CPC

Bengaluru

Intimation u/s 143(1)

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KADAKIA

PAN : AERPK6958C | AY : 2020-21 | DIN : CPC/2021/A2/140643683 | Ack. No. : 815576431141220

Sl.No.	Particulars	Reporting Heads	Amount in ₹ As provided by Taxpayer	Amount in ₹ As Computed u/s 143(1)
01	HEADS OF INCOME	Salaries	0	0
02		Income from house property	2,06,19,772	2,06,19,772
03		Income from capital gains	0	0
04		Income from other sources	2,63,971	2,63,971
05		Intra head adjustments of current year losses	0	0
06		Total of head wise income [6=(1+2+3+4)-5]	2,08,83,743	2,08,83,743
07		Losses of current year set off against 6	0	0
08		Balance after set off current year losses(6-7)	2,08,83,743	2,08,83,743
09		Brought forward losses set off against 8	0	0
10		Gross Total Income [10=(8-9)]	2,08,83,743	2,08,83,743
11	SPECIAL INCOME	(i) Income chargeable to tax at special rate u/s 115BBE	0	0
		(ii) Income chargeable to tax at special rate other than section 115BBE	0	0
12	CHAPTER VI-A	Total Deductions Under Chapter VI-A	10,000	10,000
13		Total Income [13=(10-12)]	2,08,73,740	2,08,73,740
14		Income which is included in 13 and chargeable to tax at special rates (total of column (i) of schedule SI)	0	0
15		Net agricultural income/ any other income for rate purpose	0	0
16		Aggregate Income [16=(13-14+15)]	2,08,73,740	2,08,73,740
17		Loss of current year to be carried forward	0	0
18		Deemed income under section 115JC	2,08,73,740	2,08,73,740
19	TAX DETAILS	Tax at normal rates on 16	60,74,622	60,74,622
20		(i) Tax on 115BBE	0	0
		(ii) Other than section 115BBE	0	0
21		Rebate on agricultural income	0	0
22		Tax	60,74,622	60,74,622
23		Rebate u/s 87A	0	0
24		Tax Payable after Rebate [24=(22-23)]	60,74,622	60,74,622
25		Surcharge		
		(i) 25% of Tax on Income chargeable u/s 115BBE	0	0
		(ii) 10% or 15% as applicable of 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii) of Schedule SI	14,83,493	14,83,496
		(iii) On [(25) - (16(ii), 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii) of Schedule SI)]		
		(iv) Total (i + ii +iii)	14,83,493	14,83,496
26		Health and Education Cess @ 4% on [24+25(iv)]	3,02,325	3,02,325
27		Gross tax liability [(27=24+25(iv)+26)]	78,60,440	78,60,443
28	TAX RELIEF	Relief u/s 89	0	0
29		Relief u/s 90/90A	0	0
30		Relief u/s 91	0	0
31		Total tax relief [31=(28+29+30)]	0	0
32	TOTAL INCOME TAX LIABILITY	Net tax liability [32=(27-31)]	78,60,440	78,60,443

Name : RAJESH KADAKIA

PAN : AERPK6958C | AY : 2020-21 | DIN : CPC/2021/A2/140643683 | Ack. No. : 815576431141220

Sl.No.	Particulars	Reporting Heads	Amount in ₹ As provided by Taxpayer	As Computed u/s 143(1)
33	INTEREST AND FEE PAYABLE	(a) Interest u/s 234A	0	0
		(b) Interest u/s 234B	0	0
		(c) Interest u/s 234C	0	0
		(d) Fee u/s 234F	0	0
		(e) Total Interest And Fee Payable [33e=(33(a)+33(b)+33(c)+33(d)]	0	0
34		Aggregate income tax liability [34=(32+33e)]	78,60,440	78,60,443
35	PRE-PAID TAXES	(a) Advance Tax	0	0
		(b) TDS	1,25,40,643	1,25,40,643
		(c) TCS	0	0
		(d) Self Assessment Tax	0	0
		(e) Total tax paid [35e= {35(a)+35(b)+35(c)+35(d)}]	1,25,40,643	1,25,40,643
36	REFUND	Refund Amount [36=(35e-34)]	46,80,200	46,80,200
37		Delay attributable to Taxpayer (in months)	N/A	0
38		Interest u/s 244A on refund (on item 36 above after considering item 37)	N/A	1,77,099
39		TDS deducted on interest paid u/s 244A (on item 38 above and for NON-RESIDENT only)	N/A	0
40		Total income tax refund [40=(36+38-39)]	N/A	48,57,300
41	Total outstanding demand and interest payable u/s 220(2) to the extent adjusted with the refund amount.			0
42	**Net Amount Refundable 42=(40-41)**			**48,57,300**

Intimation u/s 143(1)

CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KADAKIA

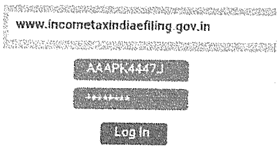
PAN : AERPK6958C | AY : 2020-21 | DIN : CPC/2021/A2/140643683 | Ack. No. : 815576431141220

Notes:

1. Interest u/s 244A of the Income Tax Act, 1961 is computed up to the date of issue of the refund.
2. The refund determined in this intimation, along with interest u/s 244A is subject to adjustment of arrear demand, if any, u/s 245
3. The Refund is issued by the State Bank of India (Refund Banker) on behalf of the Income Tax Department. The details of the status of the Refund can be obtained from website (www.tin-nsdl.com) under "Status of Tax Refunds". In case of any difficulty or delay in the receipt of refund, kindly call the State Bank of India Call Center number 18004259760 to know the status of refund.
4. If you consider that any part of this intimation requires to be rectified, you may request for a rectification u/s 154 of the Income Tax Act 1961.

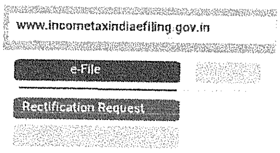
To file a Rectification Request

1



Log on to www.incometaxindiaefiling.gov.in with your PAN Number and Password.

2



Click on 'Rectification request' under 'e-File' tab.

GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
ADIT(INT TAXN)-1,HYD

To, Rajesh Kumar Jayantilal Kadakia, 5-2-233 Gokul,3rd Floor,Opp Andhra Bank Distillery Road, Secunderabad-500003	

PAN:AERPK6958C	A.Y.2020-21	DIN:	Dated:25.05.2022

Name of the assessee	**Rajesh Kumar Jayantilal Kadakia**
Address of the assessee	5-2-233 Gokul,3rd Floor,Opp Andhra Bank Distillery Road, Secunderabad-500003
Status	**INDIVIDUAL**
Resident/Resident but not Ordinary residen/Non-resident.	
Date of Hearing	**14/07/2021,02/03/2022**
Section	**143(3) of the IT act.**

ASSESSMENT ORDER

1.Shri Rajesh Kumar Jayantilal (hereinafter referred to as "assessee"), a Non- resident Individual, has filed Return of Income for the F.Y.2019-20 relevant to A.Y.2020-21.

2. The case was selected for scrutiny under CASS for following reasons:

i) Deductions from Income from Other sources.

ii) Income from other sources.

3. A notice u/s 143(2) of the I.T Act,1961 was issued to the assessee by the National e-assessment Center (NeAC). The case was received by this office on transfer from NeAC as the jurisdiction over the case vests with this office.

4.Subsequently, notices U/s 142(1) were issued from time to time and assessee submitted information as called for.

5. On verification of the computation sheet submitted by the assessee, it is noticed that during the year the assessee has accrued interest from CCDs held in SDNMKJ Realty Pvt. Ltd., to the tune of Rs.89,25,000/- with an investment of Rs.8,50,00,000/- and the assessee claimed interest expenditure of Rs.88,90,253/-.

6. On verification of the submissions made by the assessee, it is learnt that the assessee incurred interest expenditure on investment of Rs.10,00,00,000/-.

7. In this connection, a show cause notice was issued to assessee requesting to show cause as to why the interest expenditure claimed on additional investment of Rs.1,50,00,000/- to the tune of Rs.13,33,538/- should not be disallowed.

8. In this connection, the assessee furnished a reply stating that out of loan Rs.10,00,00,000/-, Rs.8,50,00,000/- has gone for investment in CCDs and balance Rs.1,50,00,000/- has gone for investment in other investment and perhaps has not earned any income during the F.Y.2019-20.

9. However, the assessee's claim is not acceptable because the assessee has failed to establish the nexus for the same.

10. As the assessee has failed to disclose the income from Other sources of Rs. 13,33,538 /-, the same is added as income from other sources in the hands of the assessee.

11. Accordingly, the assessment is completed by making the addition of Rs. 13,33,538 /- under the head Income from Other Sources :

Addition of Income under the head "Income from other sources " of Rs.13,33,538/-.

Computation of Total Income:

Income from House Property:	2,06,19,772/-
Income from Other Sources:	15,97,509/-
Gross Total Income	2,22,17,281/-
Deduction under Chapter VIA	10,000/-
Total Income after Deductions	2,22,07,280/-
Tax payable on total Income	6474684/-
Surcharge	1618671/-
Education Cess	323734/-
Total Tax :	**8417089/-**

Interest U/s 234D :	44528/-
Aggregate Income Tax Liability :	8461617/-
Pre paid taxes paid	1,25,40,643/-
Total Refund payable	**40,79,026/-**

2.. Since, the assessee failed to file return of income disclosing the said income , the penalty proceedings **U/s 270A** of the IT Act will be initiated separately for under reporting and misreporting of income.

M.V. Ramesh

(M.V.Ramesh)
Deputy Commissioner of Income Tax-1
International Taxation, Hyderabad.

Form ITS – 7

NOTICE OF DEMAND UNDER SECTION 156 OF THE INCOME TAX ACT, 1961

PAN: AERPK6958C

Date: 25.05.2022

To,
Rajesh Kumar Jayantilal Kadakia,
5-2-233 Gokul,3rd Floor,
Opp Andhra Bank Distillery Road, Secunderabad-500003

1. This is to give you notice that for the assessment year **2020-21** a sum of **NIL** has been determined to be payable by you.

2. The amount should be paid to the Manager, Authorised Bank/State Bank of India/Reserve Bank of India at Hyderabad within Thirty 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 a simple interest at one and one-half percent for every or part of a month from the date commencing after 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 229 and 232 of the IT Act, 1961.

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

M.V. Ramesh

Place: Hyderabad
Date : 25/05/2022

(M.V.Ramesh)
Deputy Commissioner of Income Tax-1
International Taxation, Hyderabad.

10 1'218

OK

(2)

From:
Rajesh kumar Jayanthilal kadakia,
5-2-223, Gokul,3rd Floor,
Opp: Andhra bank
Distillery Road,
Secunderabd - 500003.

Date : 07-06-2022

To:
ADIT (Int Taxes) I-Hyd.
Aaykar Bhavan,
Basheerbagh,
Hyderabad,
Telangana – 500004.

Respected Sir/Madam,

Sub: Reply to Notice u/s.274 r.w.s.270A – Own case - Assessment Year 2020-21, PAN - AERPK6958C.

Ref: Notice dated 25-05-2022 – DIN & Notice No. ITBA/PNL/S/270A/2022-23/1043165377(1).

In connection with the above the following is submitted for your kind consideration.

1. The Income returned is Rs.2,08,73,740/-.
2. The Income assessed u/s.143(3) is Rs.2,22,07,280/-.
3. Thus there has been addition of Rs.13,33,538/-.
4. The addition is for the reason that the claim of interest paid of Rs.88,90,253/- on the borrowings of Rs-10,00,00,000/- is restricted to Rs.75,56,715/-.
5. The borrowing to the extent of Rs.8,50,00,000/- has gone for investment in CCD's on which interest income of Rs. 89,25,000/- is received. The balance of borrowing of Rs 1,50,00,000/- got invested in other investments which might have not generated income directly.
6. A view is taken that there is no direct nexus of borrowings to the extent of Rs.1,50,00,000/- with income generating investment. The estimated proportionate interest there on of Rs 13,33,538/- has been disallowed and added to income returned. It may be noted that there is no failure on my part to disclose the Income from Other Sources as stated in the Assessment Order (para 10). The fact is that the income has been fully disclosed and the issue is with regard to claim of interest paid on borrowings.
7. The addition of Rs.13,33,538/- is not on account of failure to disclose the income but is due to excessive claim of deduction on the borrowing. The borrowings of Rs.10,00,00,000/- has been made at a time and therefore the

RECEIVED
20/6/22
अपर आयकर आयुक्त (अं. क.), हैदराबाद
Addl. CIT, Int. Tax, Hyderabad

entire interest paid on such borrowings is claimed as deduction against the interest income earned.

8. Thus in effect there is an estimated disallowance of interest to the extent of Rs.13,33,538/- based on the proportionate workings.

9. The tax payable on Rs.13,33,538/- is worked out at Rs.6,01,174/-. The working are under:

As per my working I have to pay regular tax amount of Rs 5,56,646/- + Interest u/s.234D of Rs.44,528/- as per Asst. Order u/s.143(3). The workings of regular tax to be paid is as under

	As per ITR filed	As per 143(1)(a)	As per 143(3)
Total Income	2,08,73,740/-	2,08,73,740/-	2,22,07,280/-
Total Tax payable	78,60,440/-	78,60,440/-	84,17,089/-

Thus the differential tax payable is Rs 5,56,649/-(i.e is 84,17,089/- (-) Rs 78,60,440/-).

10. The said amount is paid on 16/6/22. The copy of challan is enclosed herewith **Annexure – 1.**

11. Please note that as per the Demand Notice u/s.156 the tax Demand is NIL. Since in the tax workings vide order u/s.143(3) there is an apparent mistake. I have separately filed rectification petition u/s.154. The copy of the petition is attached herewith **Annexure – 2.**

12. I have paid the taxes on the addition made and not preferring an appeal before CIT (Appeals).

13. I am therefore seperately filing a Petition in Form No.68 u/s.270AA of the Act, requesting for immunity from imposition of penalty u/s.270A of the Act.

Kindly consider the same.

Yours faithfully,

(Rajesh J Kadakia).

Annexure-II

CHALLAN RECEIPT

ıX Applicable	(0021)INCOME-TAX (OTHER THAN COMPANIES)		CHALLAN NO./ ITNS 280
ıN	AERPK6958C	Assessment Year	2020-21
ıll Name	RAJESH KUMAR JAYANTILAL KADAKIA		
ıddress	H NO 5 2 223 HYDERBASTI OPP ANDHRA BANK HYD HYDERABAD 02 Pin : 500003		
ıpe OF Payment	(400)TAX ON REGULAR ASSESSMENT		
ature of Payment	N/A		

ILS OF PAYMENT		Paid in Cash / Debit to A/c / Cheque No.:	INTERNET
ıX	601174	Drawn on	Internet Banking through IDBI
rcharge	0		
ucation Cess	0		
erest	0	IDBI BANK Ltd. IDBI Building, Sector 11, CBD Belapur, Navi Mumbai BSR Code:6910333	
nalty	0		
hers	0		
e under sec. 234E	0		
		Date Of Tender	16062022
al	601174	Realization Date	16062022
		Challan Serial No.	10926

ıees Six Lacs One Thousand One Hundred Seventy-Four Rupees Only

Taxpayers Counterfoil		Bank Seal	
ı	AERPK6958C	Payment Status	SUCCESSFUL
ieved n	RAJESH KUMAR JAYANTILAL KADAKIA	IDBI BANK Ltd. IDBI Building, Sector 11, CBD Belapur, Navi Mumbai BSR Code:6910333	
Rs :	601174 /-		
wn on	Internet Banking Through IDBI		
Account	CHALLAN NO. / ITNS 280		
e of nent	(400)TAX ON REGULAR ASSESSMENT		
ıre of nent	N/A		
ssment	2020-21	Date Of Tender	16062022
		Realization Date	16062022

169234

GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT

1.	PAN	**AERPK6958C**
2.	Name of the assessee	**RAJESH KUMAR JAYANTILAL KADAKIA**
3.	Address of the assessee	**5-2-223 GOKUL, 3RD FLOOR, OPP ANDHRA BANK DISTILLERY ROAD , SECUNDERABAD 500003, Telangana , India**
4.	Assessment Year	**2020-21**
5.	Status	**Individual**
6.	Amount of Penalty	**Rs. 260040**
7.	Date of Order	**27/03/2023**
8.	DIN	**ITBA/PNL/F/270A/2022-23/1051436439(1)**

Order under section 270A of the Income Tax Act, 1961

The assessee, Sri Rajesh Kumar Jayantilal Kadakia, a non-resident individual has filed Return of Income for the F.Y.2019-20 relevant to A.Y.2020-21. The case was selected for scrutiny under CASS.

2. During the assessment proceedings, it was observed that the assessee has taken a loan of Rs.10,00,00,000/- and has claimed interest expenditure of Rs.88,90,253/-. Out of Rs.10,00,00,000/- the assessee has invested Rs.8,50,00,000/- in M/s SDNMKJ Realty Pvt. Ltd and earned interest income of Rs.89,25,000/- whereas the remaining investment of Rs.1,50,00,000/- did not earn any income. Hence, the Assessing Officer has disallowed the proportionate interest expenditure of Rs.13,33,538/-. The assessment was accordingly completed with an addition of Rs.13,33,538/- on 25-05-2022. Thus, the Assessing Officer initiated penalty proceedings u/s 270A of the Act for under reporting income of Rs.13,33,538/-. A notice u/s 274 r.w.s 270A of the I.T.Act, 1961 dated 25-05-2022 was issued vide DIN: ITBA/PNL/S/270A/2022- 23/1043165377(1) and was duly served on the assessee through his e-mail on the same day.

3. In response to said notice, the assessee submitted response on 07-06-2022 stating that, the penalty proceedings may be dropped as the Assessing Officer has estimated the income on proportionate basis and there was no willful intention to under report or misreport the income. The assessee further informed that, the entire tax liability was paid. The above reply is taken on record. The relevant portion of reply of assessee is reproduced as under:-

1. The Income returned is Rs.2,08,73,740/-.

2. The Income assessed u/s.143(3) is Rs.2,22,07,280/-.

3. Thus there has been addition of Rs.13,33,538/-.

4. The addition is for the reason that the claim of interest paid of Rs.88,90,253/- on the borrowings of Rs-10,00,00,000/- is restricted to Rs.75,56,715/-.

5. The borrowing to the extent of Rs.8,50,00,000/- has gone for investment in CCD's on which interest income of Rs. 89,25,000/- is received. The balance of borrowing of Rs 1,50,00,000/- got invested in other investments which might have not generated income directly.

6. A view is taken that there is no direct nexus of borrowings to the extent of Rs.1,50,00,000/- with income generating investment. The estimated proportionate interest there on of Rs 13,33,538/- has been disallowed and added to income returned. It may be noted that there is no failure on my part to disclose the Income from Other Sources as stated in the Assessment Order (para 10). The fact is that the income has been fully disclosed and the issue is with regard to claim of interest paid on borrowings.

7. The addition of Rs.13,33,538/- is not on account of failure to disclose the income but is due to excessive claim of deduction on the borrowing. The borrowings of Rs.10,00,00,000/- has been made at a time and therefore the

entire interest paid on such borrowings is claimed as deduction against the interest income earned.

8. Thus in effect there is an estimated disallowance of interest to the extent of Rs.13,33,538/- based on the proportionate workings.

9. The tax payable on Rs.13,33,538/- is worked out at Rs.6,01,174/-. The working are under:

As per my working I have to pay regular tax amount of Rs 5,56,646/- + Interest u/s.234D of Rs.44,528/- as per Asst. Order u/s.143(3). The workings of regular tax to be paid is as under

	As per ITR filed	As per 143(1)(a)	As per 143(3)
Total Income	2,08,73,740/-	2,08,73,740/-	2,22,07,280/-
Total Tax payable	78,60,440/-	78,60,440/-	84,17,089/-

Thus the differential tax payable is Rs 5,56,649/-(i.e is 84,17,089/- (-) Rs 78,60,440/-).

10. The said amount is paid on 16/6/22. The copy of challan is enclosed herewith **Annexure – 1.**

11. Please note that as per the Demand Notice u/s.156 the tax Demand is NIL. Since in the tax workings vide order u/s.143(3) there is an apparent mistake. I have separately filed rectification petition u/s.154. The copy of the petition is attached herewith **Annexure – 2.**

4. Further, it is pertinent to mention here that, on a careful examination of the Assessment order and reply of assessee, it is observed that it is not a case of misreporting of income as it does not fit under the provisions of sub section 9 of 270A of Income Tax Act 1961. However, the case clearly falls under underreporting of income of Rs.13,33,538/-. Further, in view of the above facts and circumstances, it is not the case of estimation of income which is out of the purview of sub section 6 of section 270A of Income Tax Act 1961 as requested by assessee. Hence the assessee's request for dropping the penalty is rejected.

5. In view of the foregoing discussion, on the basis of assessment order, material available on record and the explanation of the assessee to the show

cause notices, it can be seen that the assessee has underreported the income of Rs.13,33,538/- and is liable for penalty u/s 270A of the Act . The relevant portion of the S.270A of the Income Tax Act, 1961 is reproduced as under

> " *(1) The Assessing Officer or the Commissioner (Appeals) or the Principal Commissioner or Commissioner may, during the course of any proceedings under this Act, direct that any person who has under-reported his income shall be liable to pay a penalty in addition to tax, if any, on the under-reported income.*
>
> *(2) A person shall be considered to have under-reported his income, if—*
>
> *(a) the income assessed is greater than the income determined in the return processed under clause (a) of sub-section (1) of* section 143;
>
> *(b).........;*
>
> *(c) ....;*
>
> *(d)........;*
>
> *(e) ....;*
>
> *(f)).........*
>
> *(3) The amount of under-reported income shall be,—*
>
> *(i) in a case where income has been assessed for the first time,—*
>
> *(a) if return has been furnished, the difference between the amount of income assessed and the amount of income determined under clause (a) of sub-section (1) of* section 143;
>
> *(b).................. "*

6. From the foregoing provisions, it is clear that the assessee is liable to pay penalty at the rate of 50% of tax payable on the under reported income of Rs.13,33,538/-. Accordingly, I levy a penalty of Rs.2,60,040/- i.e. 50% of tax of Rs.5,20,080/- on under reported income u/s 270A of the Income Tax,1961. Demand notice u/s 156 of Income tax Act 1961 is enclosed.

7. This order has been passed with the prior approval of the Additional Commissioner of Income tax as per section 274(2) of Income Tax Act, 1961.

RAGHAVA SAI KRISHNAMNAIDU KOMMULA
ADIT(INT TAXN)-1,HYD

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)

This document is digitally signed
Signer: RS KRISHNAMNAIDU KOMMULA
Date: 29 March 2023 :30
Location: HYDERABAD, India

GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT

To, RAJESH KUMAR JAYANTILAL KADAKIA 5-2-223 GOKUL, 3RD FLOOR, OPP ANDHRA BANK DISTILLERY ROAD SECUNDERABAD 500003, Telangana India	

Computation Sheet

General Details			
PAN	AERPK6958C	**Assessment Year**	2020-21
Name	RAJESH KUMAR JAYANTILAL KADAKIA	**Address**	5-2-223,GOKUL, 3RD FLOOR, OPP ANDHRA BANK,DISTILLERY ROAD, SECUNDERABAD,
Residential Status	Non-Resident	**Order Passing Authority**	AOINTL
DIN & Order Number	ITBA/PNL/F/270A/2022-23/1046506097(1)	**Order Date**	27/03/2023
Date of Issue of Computation Sheet	27/03/2023		
Computation Details			
Penalty Section	270A	**Penalty Demand (in Rs.)**	2,60,040
DIN No.	2022202040412097556T		

RAGHAVA SAI KRISHNAMNAIDU KOMMULA
ADIT(INT TAXN)-1,HYD

Note: If digitally signed, the date of digital signature may be taken as date of document.
,AAYKAR BHAWAN, OPPOSITE LB STADIUM, BASHEER BAGH, HYDERABAD, HYDERABAD, Telangana, 500004
Email: HYDERABAD.DDIT.IT1@INCOMETAX.GOV.IN,

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.
* DIN- Document identification No.

GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
ADIT(INT TAXN)-1,HYD

To, RAJESH KUMAR JAYANTILAL KADAKIA 5-2-223 GOKUL, 3RD FLOOR,OPP ANDHRA BANK DISTILLERY ROAD SECUNDERABAD 500003,Telangana India	

PAN:	Date:	Status:	DIN & Notice No:
AERPK6958C	**27/03/2023**	**Individual**	**ITBA/PNL/S/156/2022-23/1051432664(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 **2020-21** sum of Rs. **260040**, 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. The previous approval of the Joint Commissioner of Income-tax has been obtained for allowing a period of less than 30 days for the payment of the above sum.

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 of the Income Tax Act, 1961 .

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 penalty, you may present an appeal under **Part A of Chapter XX of the Income Tax Act, 1961,** to the **CIT (A), Hyderabad- 10** within thirty days of the receipt of this notice in Form No. 35, duly stamped and verified as laid down in that form.

RAGHAVA SAI KRISHNAMNAIDU KOMMULA
ADIT(INT TAXN)-1,HYD

Notes:

INCOME TAX DEPARTMENT

Challan Receipt

e-Filing Anywhere Anytime
Income Tax Department, Government of India

ITNS No. : 280

PAN	:	AERPK6958C
Name	:	RAJESH KUMAR JAYANTILAL KADAKIA
Assessment Year	:	2020-21
Financial Year	:	2019-20
Major Head	:	Income Tax (Other than Companies) (0021)
Minor Head	:	Outstanding Demand (Regular Assessment Tax) (400)
Amount (in Rs.)	:	₹ 2,67,840
Amount (in words)	:	Rupees Two Lakh Sixty Seven Thousand Eight Hundred Forty Only
CIN	:	23071800256726RBIS
Mode of Payment	:	RTGS/NEFT
Bank Name	:	RBIS
Bank Reference Number	:	20230724174628884152
Date of Deposit	:	24-Jul-2023
BSR code	:	6939001
Challan No	:	10008
Tender Date	:	24/07/2023

Tax Breakup Details (Amount In ₹)

A	Tax	₹ 2,60,040
B	Surcharge	₹ 0
C	Cess	₹ 0
D	Interest	₹ 7,800
E	Penalty	₹ 0
F	Others	₹ 0
	Total (A+B+C+D+E+F)	₹ 2,67,840
	Total (In Words)	Rupees Two Lakh Sixty Seven Thousand Eight Hundred Forty Only

Thanks for being a committed taxpayer!

Please print this challan receipt only if absolutely required. Save Paper, Save Environment.

Congrats! Here's what you have just achieved by choosing to pay online:

Time
Quick and Seamless

Paper
Save Environment

e-Receipt
Easy Access

धारा 143(1) के तहत सूचना

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

नाम : राजेश कुमार जयंतीलाल कडकिया

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2022-23 | पावती सं. : 301486811300722 | पत्र संदर्भ संख्या : CPC/2223/A2/307348828

क्र.सं.	विवरण	रिपोर्टिंग शीर्ष	राशि (₹ में) करदाता द्वारा प्रदान किया गया	धारा 143(1) की गणना के अनुसार
01	आय के शीर्ष	वेतन	0	0
02		गृह संपत्ति से आय	1,89,55,803	1,89,55,803
03		पूंजीगत लाभ से प्राप्त आय	0	0
04		अन्य स्रोतों से आय	29,09,022	29,09,022
05		वर्तमान वर्ष की हानि के अंतरा शीर्ष समायोजन	0	0
06		कुल शीर्षवार आय [6=(1+2+3+4)]	2,18,64,825	2,18,64,825
07		6 के विरूद्ध वर्तमान वर्ष की हानि का समायोजन	0	0
08		वर्तमान वर्ष की हानि के समायोजन के बाद शेष (6-7)	2,18,64,825	2,18,64,825
09		8 के विरूद्ध आगे लाई गई हानि का समायोजन	0	0
10		कुल सकल आय [10=(8-9)]	2,18,64,825	2,18,64,825
11	विशेष आय	(i) धारा 115BBE के तहत विशेष दर पर कर प्रभार्य आय	0	0
		(ii) धारा 115BBE के अलावा विशेष दर पर कर प्रभार्य आय	0	0
12	अध्याय VI-A	अध्याय VI-A के अंतर्गत कटौती	10,000	10,000
13		कुल आय [13= (10-12)]	2,18,54,830	2,18,54,830
14		ऐसी आय जो 13 में शामिल की गई हो तथा विशेष दरों पर कर प्रभार्य हो (अनुसूची SI के स्तम्भ (i) का योग)	0	0
15		शुद्ध कृषि-आय / दर प्रयोजन के लिए कोई अन्य आय (अनुसूची EI का 3)	0	0
16		कुल आय [16=(13-14+15)]	2,18,54,830	2,18,54,830
17		आगे ले जाई गयी वर्तमान वर्ष की हानि	46,98,961	46,98,961
18		धारा 115JC के तहत मान्य आय	2,18,54,830	2,18,54,830
19	धारा 115JC के तहत कर का विवरण	(a) धारा 115JC के तहत मान्य कुल आय पर देय कर	0	0
		(b) [(a) पर] अधिभार	0	0
		(c) ऊपर (a+b) पर 4% की दर से स्वास्थ्य और शिक्षा उपकर	0	0
		(d) मान्य कुल आय पर देय कुल कर [(a+b+c)]	0	0
20	कर का विवरण	भाग B-TI के 16 पर सामान्य दरों पर कर	63,68,949	63,68,949
21		(i) 115BBE पर कर	0	0
		(ii) धारा 115BBE के अलावा	0	0
22		कृषि आय पर छूट	0	0
23		कुल आय पर देय कर [23=(20+21(i)+21(ii)-22)]	63,68,949	63,68,949
24		धारा 87A के तहत छूट	0	0
25		छूट के बाद देय कर [25=(23-24)]	63,68,949	63,68,949
26		अधिभार		
		सीमांत राहत से पहले संगणित अधिभार		
		(i) धारा 115BBE के तहत प्रभार्य आय पर कर का 25%	0	0
		(ii) 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii) का 10% या 15%जैसा लागू हो, अनुसूची SI की धारा 115AD(1) के तहत लाभांश आय और कुल आय में शामिल लाभांश आय	15,92,237	15,92,237
		(iii) [25 - (अनुसूची SI के 16(ii), 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii))] पर		
		सीमांत राहत के बाद संगणित अधिभार (यदि कोई हो)		

धारा 143(1) के तहत सूचना

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

नाम : राजेश कुमार जयंतीलाल कडकिया

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2022-23 | पावती सं. : 301486811300722 | पत्र संदर्भ संख्या : CPC/2223/A2/307348828

क्र.सं.	विवरण	रिपोर्टिंग शीर्ष	राशि (₹ में) करदाता द्वारा प्रदान किया गया	धारा 143(1) की गणना के अनुसार
		(ia) धारा 115BBE के तहत प्रभार्य आय पर कर का 25%	0	0
		(iia) ऊपर वर्णित घटकों पर (ii) और (iii)	15,92,237	15,92,237
		(iv) कुल (ia + iia)	15,92,237	15,92,237
27		स्वास्थ्य और शिक्षा उपकर @ 4% की दर से (25+26iv) पर	3,18,447	3,18,447
28		सकल कर देयता [(28=25+26(iv)+27)]	82,79,633	82,79,633
29		सकल देय कर (19d या 28 में से जो भी अधिक है)	82,79,633	82,79,633
		(a) धारा 17(2)(vi) के अंतर्गत निर्दिष्ट परिलब्धियाँ पर आय को छोड़कर आय पर कर, जो नियोक्ता से योग्य स्टार्ट-अप होने के कारण प्राप्त होता है और धारा 80-IAC के तहत (अनुसूची वेतन) में निर्दिष्ट है	82,79,633	82,79,633
		(b) आस्थगित कर – धारा 17(2)(vi) के तहत निर्दिष्ट परिलब्धियों पर आय से संबंधित, जो नियोक्ता से योग्य स्टार्ट-अप होने के कारण प्राप्त होता है और धारा 80-IAC में निर्दिष्ट है	0	0
		(c) पूर्व वर्षों से आस्थगित कर, लेकिन वर्तमान निर्धारण वर्ष के दौरान देय (अनुसूची ESOP पर आस्थगित कर के कॉलम 7 का कुल)	0	0
30		धारा 115JD के तहत पिछले वर्षों में भुगतान किए गए कर का क्रेडिट	0	0
31		धारा 115JD के तहत क्रेडिट के बाद देय कर [29(a)+29(c)-30]	82,79,633	82,79,633
32	कर राहत	धारा 89 के तहत राहत	0	0
33		धारा 90/90A के तहत राहत	0	0
34		धारा 91 के तहत राहत	0	0
35		कुल कर राहत [35=(32+33+34)]	0	0
36	कुल आयकर देय	कुल कर देय [36=(31-35)]	82,79,633	82,79,633
37	ब्याज और देय शुल्क	(a) धारा 234A के तहत ब्याज	0	0
		(b) धारा 234B के तहत ब्याज	0	0
		(c) धारा 234C के तहत ब्याज	0	0
		(d) धारा 234F के तहत शुल्क	0	0
		(e) कुल ब्याज और देय शुल्क [37e={37(a)+37(b)+37(c)+37(d)}]	0	0
38		कुल आयकर देय [38=(36+37e)]	82,79,633	82,79,633
39	भुगतान किया गया कर	(a) अग्रिम कर	500	500
		(b) टी डी एस	2,02,46,212	2,02,46,212
		(c) टी सी एस	0	0
		(d) स्वतः निर्धारित कर	0	0
		(e) कुल भुगतान किया गया कर [39e={39(a)+39(b)+39(c)+39(d)}]	2,02,46,712	2,02,46,712
40	प्रतिदाय	प्रतिदाय राशि [40=(39e-38)]	1,19,67,080	1,19,67,079
41		करदाता को विलंब श्रेय (महीनों में)	N/A	0
42		धारा 244A के तहत प्रतिदाय पर ब्याज (क्रम संख्या 41 पर विचार करने के बाद क्रम संख्या 40 के तहत प्रतिदाय राशि पर)	N/A	4,18,845
43		धारा 244A के तहत भुगतान किए गए ब्याज पर टी डी एस की कटौती (क्रम संख्या 42 पर और केवल अनिवासी के लिए)	N/A	1,30,680
44		कुल आयकर प्रतिदाय [44=(40+42-43)]	N/A	1,22,55,244

नाम : राजेश कुमार जयंतीलाल कडकिया

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2022-23 | पावती सं. : 301486811300722 | पत्र संदर्भ संख्या : CPC/2223/A2/307348828

क्र.सं.	विवरण	रिपोर्टिंग शीर्ष	राशि (₹ में) करदाता द्वारा प्रदान किया गया	धारा 143(1) की गणना के अनुसार
45	कमः धारा 245 कप्रक्रिया का पालन करने के बाद पिछले निर्धारण वर्ष (वर्षों) की मांग (मांगों) और धारा 220(2) के तहत देय ब्याज के खिलाफ समायोजित प्रतिदाय की राशि।			1,22,55,240
46	शेष			0

नाम : राजेश कुमार जयंतीलाल कडकिया

स्थायी खाता संख्या : AERPK6958C | निर्धारण वर्ष : 2022-23 | पावती सं. : 301486811300722 | पत्र संदर्भ संख्या : CPC/2223/A2/307348828

ध्यान दें:

1. बकाया मांग के विरूद्ध निर्धारित प्रतिदाय नीचे दी गई तालिका "धारा 220 (2) के तहत बकाया मांग और देय ब्याज के विरूद्ध प्रतिदाय के समायोजन का विवरण" के अनुसार समायोजित की जाती है। ऐसे मामलों में जहां प्रतिदाय राशि, CPC मांग के अलावा दूसरे मांग के विरूद्ध समायोजित की गई है, आप ऐसी मांग में किसी भी सुधार या संशोधन के लिए अपने वर्तमान क्षेत्राधीन निर्धारण अधिकारी (AO से संपर्क कर सकते हैं
2. यदि रिफंड को किसी बकाया मांग के खिलाफ समायोजित किया गया है,तो उस संबंध में एक संचार अलगसे भेजा जा रहा है,जिसमें समायोजन का विवरण दिया गया है।

धारा 220 (2) के तहत देय ब्याज और बकाया माँग का प्रतिदाय से समायोजन का विवरण

क्रम संख्या	नि. व.	जिसके द्वारा अपलोड की गयी	माँग राशि (₹)	माँग संदर्भ संख्या	आदेश की दिनांक	अनुभाग	करदाता का जवाब	धारा 220(2) के तहत समायोजित ब्याज की राशि (₹ में)	समायोजित राशि (₹ में)
1	2020	ITBA	1,33,99,229	2022202040411527465T	30-09-2022	143	NO RESPONSE	**5,35,968**	**1,22,55,240**
समायोजन के बाद प्रतिदाय योग्य शुद्ध राशि									**0**

धारा 220(2) के तहत बकाया मांग और देय ब्याज का विवरण

क्रम संख्या	नि. व.	जिसके द्वारा अपलोड की गयी	अनुभाग कोड	माँग आदेश की दिनांक	माँग संदर्भ संख्या	मूल बकाया (₹ में) माँग
1	2020	ITBA	**143**	25-05-2022	2022202040411527465T	**11,43,989**

ध्यान दें:

1. A.Y.2021 अर्थात् निर्धारण वर्ष2021-22।
2. बकाया मांग के संबंध में भुगतान, केवल लघु प्रधान कोड '400' का उपयोग करके ही किया जाना चाहिए।
3. प्रत्येक निर्धारण वर्ष के लिए अलग चालान का उपयोग करें।

Intimation u/s 143(1)

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KUMAR JAYANTILAL KADAKIA
Address : 5-2-223 GOKUL, 3RD FLOOR, OPP ANDHRA BANK DISTILLERY ROAD, SECUNDERABAD Telangana 500003 INDIA
Ph : 91-9121282859

नाम: राजेश कुमार जयंतीलाल कडकिया
पता: 5-2-223 गोकुल, 3र्द फ़्लोर, आंध्र बैंक के सामने डिसटिल्लरी रोड, सिकन्दराबाद तेलंगना 500003 इंडिया
फ़ोन: 91-9121282859

PAN : AERPK6958C | AY : 2022-23 | Ack. No. : 301486811300722 | DIN : CPC/2223/A2/307348828

Your Return for A.Y. 2022-23 has been processed. There is no payment due.

ITR Form Type	Date of Filing	Intimation Order Date	
ITR2 Original	30/07/2022	04/10/2022	
Due Date	**Extended Due Date**	**Status**	**Residential status**
31/07/2022	31/07/2022	Individual	Non Resident

RETURN DETAILS

Sl.No.	Particulars	Reporting Heads	Amount in ₹ As provided by Taxpayer	Amount in ₹ As Computed u/s 143(1)
01	Taxation option	Opted for 115BAC	No	No
02	Income Details	Total Income	2,18,54,830	2,18,54,830
03	Tax Details	Tax Liability after relief	82,79,633	82,79,633
04	Interest and Fee Payable	Total Interest And Fee (234A, 234B, 234C & 234F)	0	0
05	Pre-paid Taxes	Total Taxes Paid (Advance Tax, TDS, TCS, Self Assessment Tax)	2,02,46,712	2,02,46,712
06	Balance		1,19,67,080	0
07	Net Amount Payable / Refundable		0	0

Signature Not Verified
Digitally signed by SAIRAJ N
Date: 2022.10.19 01:22:50 IST
Reason: Digitally Signed
Location: Bengaluru

N SAIRAJ
Asst. Director of Income Tax, CPC
Bengaluru

Intimation u/s 143(1)

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KUMAR JAYANTILAL KADAKIA

PAN : AERPK6958C | AY : 2022-23 | Ack. No. : 301486811300722 | DIN : CPC/2223/A2/307348828

Sl.No.	Particulars	Reporting Heads	Amount in ₹ As provided by Taxpayer	Amount in ₹ As Computed u/s 143(1)
01	HEADS OF INCOME	Salaries	0	0
02		Income from house property	1,89,55,803	1,89,55,803
03		Capital gains	0	0
04		Income from other sources	29,09,022	29,09,022
05		Intra head adjustments of current year losses	0	0
06		Total of head wise income [6=(1+2+3+4)]	2,18,64,825	2,18,64,825
07		Losses of current year set off against 6	0	0
08		Balance after set off current year losses(6-7)	2,18,64,825	2,18,64,825
09		Brought forward losses set off against 8	0	0
10		Gross Total Income [10=(8-9)]	2,18,64,825	2,18,64,825
11	SPECIAL INCOME	(i) Income chargeable to tax at special rate u/s 115BBE	0	0
		(ii) Income chargeable to tax at special rate other than section 115BBE	0	0
12	CHAPTER VI-A	Deductions Under Chapter VI-A	10,000	10,000
13		Total Income [13=(10-12)]	2,18,54,830	2,18,54,830
14		Income which is included in 13 and chargeable to tax at special rates (total of column (i) of schedule SI)	0	0
15		Net agricultural income/ any other income for rate purpose (3 of Schedule EI)	0	0
16		Aggregate Income [16=(13-14+15)]	2,18,54,830	2,18,54,830
17		Losses of current year to be carried forward	46,98,961	46,98,961
18		Deemed income under section 115JC	2,18,54,830	2,18,54,830
19	TAX DETAILS U/S 115JC	(a) Tax payable on deemed total income u/s 115JC	0	0
		(b) Surcharge [on (a)]	0	0
		(c) Health and education cess @4% on (a+b) above	0	0
		(d) Total Tax Payable on deemed total income [(a+b+c)]	0	0
20	TAX DETAILS	Tax at normal rates on 16 of Part B-TI	63,68,949	63,68,949
21		(i) Tax on 115BBE	0	0
		(ii) Other than section 115BBE	0	0
22		Rebate on agricultural income	0	0
23		Tax Payable on Total Income [23=(20+21(i)+21(ii)-22)]	63,68,949	63,68,949
24		Rebate u/s 87A	0	0
25		Tax Payable after Rebate [25=(23-24)]	63,68,949	63,68,949
26		Surcharge		
		Surcharge computed before marginal relief		
		(i) 25% of Tax on Income chargeable u/s 115BBE	0	0
		(ii) 10% or 15% as applicable of 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii), Dividend income u/s 115AD(1)(a) of Schedule SI and Dividend income included in Part B TI	15,92,237	15,92,237
		(iii) On [(25) - (16(ii), 2(ii), 3(ii), 8(ii), 11(ii), 21(ii), 23(ii) of Schedule SI)]		
		Surcharge after marginal relief (if any)		
		(ia) 25% of Tax on Income chargeable u/s 115BBE	0	0
		(iia) On the components mentioned that (ii) and (iii) above	15,92,237	15,92,237

Intimation u/s 143(1)

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KUMAR JAYANTILAL KADAKIA

PAN : AERPK6958C | AY : 2022-23 | Ack. No. : 301486811300722 | DIN : CPC/2223/A2/307348828

Sl.No.	Particulars	Reporting Heads	Amount in ₹ As provided by Taxpayer	As Computed u/s 143(1)
		(iv) Total (ia + iia)	15,92,237	15,92,237
27		Health and Education Cess @ 4% on (25+26iv)	3,18,447	3,18,447
28		Gross tax liability [(28=25+26(iv)+27)]	82,79,633	82,79,633
29		Gross Tax Payable (Higher of 19d or 28)	82,79,633	82,79,633
		(a) Tax on income without including income on perquisites referred in section 17(2)(vi) received from employer, being an eligible start-up referred to in section 80-IAC (Schedule Salary)	82,79,633	82,79,633
		(b) Tax deferred - relatable to income on perquisites referred in section 17(2)(vi) received from employer, being an eligible start-up referred to in section 80-IAC	0	0
		(c) Tax deferred from earlier years but payable during current AY (total of col 7 of schedule Tax deferred on ESOP)	0	0
30		Credit u/s 115JD of tax paid in earlier years	0	0
31		Tax Payable after credit u/s 115JD [29(a)+29(c)-30]	82,79,633	82,79,633
32	TAX RELIEF	Relief u/s 89	0	0
33		Relief u/s 90/90A	0	0
34		Relief u/s 91	0	0
35		Total tax relief [35=(32+33+34)]	0	0
36	TOTAL INCOME TAX LIABILITY	Net tax liability [36=(31-35)]	82,79,633	82,79,633
37	INTEREST AND FEE PAYABLE	(a) Interest u/s 234A	0	0
		(b) Interest u/s 234B	0	0
		(c) Interest u/s 234C	0	0
		(d) Fee u/s 234F	0	0
		(e) Total Interest And Fee Payable[37e=(37(a)+37(b)+37(c)+37(d)]	0	0
38		Aggregate income tax liability [38=(36+37e)]	82,79,633	82,79,633
39	TAXES PAID	(a) Advance Tax	500	500
		(b) TDS	2,02,46,212	2,02,46,212
		(c) TCS	0	0
		(d) Self Assessment Tax	0	0
		(e) Total taxes paid [39e= {39(a)+39(b)+39(c)+39(d)}]	2,02,46,712	2,02,46,712
40	REFUND	Refund Amount [40=(39e-38)]	1,19,67,080	1,19,67,079
41		Delay attributable to Taxpayer (in months)	N/A	0
42		Interest u/s 244A on refund (on item 40 above after considering item 41)	N/A	4,18,845
43		TDS deducted on interest paid u/s 244A (on item 42 above and for NON-RESIDENT only)	N/A	1,30,680
44		Total income tax refund [44=(40+42-43)]	N/A	1,22,55,244
45	Less: Amount of refund adjusted against demand(s) of earlier AY(s) and/or interest payable under section 220(2) after following due process under section 245.			1,22,55,240
46	Balance			0

Intimation u/s 143(1)

आयकर केन्द्र
CENTRALIZED PROCESSING CENTER
INCOME TAX DEPARTMENT

Name : RAJESH KUMAR JAYANTILAL KADAKIA

PAN : AERPK6958C | AY : 2022-23 | Ack. No. : 301486811300722 | DIN : CPC/2223/A2/307348828

Notes:

1. The refund determined is adjusted against outstanding demand, as mentioned in the table "DETAILS OF ADJUSTMENT OF REFUND AGAINST OUTSTANDING DEMAND AND ANY INTEREST PAYABLE u/s 220(2)" given below. In cases where the refund adjusted is against demand which is other than CPC demand, You may consider contacting your current jurisdictional Assessing Officer (AO) for any rectification or modification of such demand.
2. If the refund is adjusted against any outstanding demand, a separate communication is also being sent in respect of the same, detailing the adjustment.

Details of Adjustment of Refund against Outstanding Demand and Interest payable u/s 220(2)

Sl.No.	A.Y.	Demand Uploaded by	Demand Amount in ₹	Demand Reference Number	Order Date	Section	Taxpayer's Response	Amount of Interest u/s 220(2) adjusted in ₹	Amount of Adjustment in ₹
1	2020	ITBA	1,33,99,229	2022202040411527465T	30-09-2022	143	NO RESPONSE	5,35,968	1,22,55,240
Net Amount Refundable after Adjustment									**0**

Details of balance Outstanding Demand and Interest payable u/s 220(2)

Sl.No.	A.Y.	Demand Uploaded by	Section Code	Demand Order Date	Demand Reference Number	Outstanding Demand in ₹
1	2020	ITBA	143	25-05-2022	2022202040411527465T	11,43,989

Notes:

1. A.Y. 2021 implies Assessment Year 2021-22.
2. Any payment with respect to outstanding demand should be paid using minor head code '400' only.
3. Use separate challan for each Assessment Year.

Confirmation on Outstanding Demand Response

From: communication@cpc.incometax.gov.in

To: it_c@modiproperties.com

Date: Tuesday, July 18, 2023 at 03:44 PM GMT+5:30

RJK
22-23
to be filed.

Dear Sir/Madam,
RAJESH KUMAR JAYANTILAL KADAKIA,

Response Disagree with demand Full/Part for Outstanding Tax Demand is submitted for the User ID AEXXXXXX8C and the Transaction ID is FOS002734200565 .

Disclaimer: *Your response has been registered. However, it is subject to the verification and confirmation by your* Jurisdictional Assessing Officer

This is a system generated e-mail and please do not reply. Add communication@cpc.incometax.gov.in to your white list / safe sender list. Else, your mailbox filter or ISP (Internet Service Provider) may stop you from receiving e-mails.

If you did not register and you have received this email, it may mean that somebody else has registered . Please contact 1800 103 0025 immediately.

Thanks & Regards,

e-Filing team,
Income Tax Department