



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT



To, SHREYA RAHUL BIJAI C-401 SUYOG APTS ,LAXMAN MHATRE ROAD DAHISAR WEST MUMBAI 400068 ,Maharashtra India	
--	--

PAN: BGRPS9767E	Assessment Year: 2017-18	Date: 07/03/2023	DIN: ITBA/AST/F/144(SCN)(F)/20 22-23/1050474210(1)
--------------------	-----------------------------	---------------------	--

Show cause Notice u/s 144 of the Income-tax Act, 1961

Ms/ Mr/ M/s,

Kindly refer to Faceless Assessment Proceedings in your case for A. Y. **2017-18**.

2. The following notices u/s 142(1) had been issued to you and served in your account on e-filing portal and registered email id, which have not been complied with till date:-

S No	Date of issue of notice u/s 142(1)	Date of Compliance	Document Number
1	12/01/2023	22/01/2023	ITBA/AST/F/142(1)/2022-23/1048656549(1)

3. The above clearly shows that you have failed to comply with the terms of notice(s) issued under section 142(1). It is proposed to assess your income under section 144 on the basis of material available on record along the following lines:-

1. Details of opportunities given

Type of notice/communication	Date of notice/communication	Date of compliance given	Response of assessee received/not received	Date of response if received	Response type(full/part/adjournment)	Remarks if any

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.

Notice u/s 148	28/07/2022	28/08/2022	Not received	NA	NA	-
Intimation Letter	02/11/2022	-	-	-	-	-
Notice u/s 142(1)	12/01/2023	22/01/2023	Not received	NA	NA	
Reminder	23/01/2023	28/01/2023	Not received	NA	NA	AU-1
Issue letter	31/01/2023	15/02/2023	Not received	NA	NA	Show Cause Notice
Show Cause Notice	27/02/2023	05/03/2023	Not received	NA	NA	NA

2. Variation proposed

2.1. Complete description of issues involved (issue wise)

The case is selected for “The assessee has not filed return of income for A.Y.2017-18. Subsequently, information has been received from the office of the I&CI, Mumbai during March 2019 that the assessee has purchased an immovable property for a purchase consideration of Rs. 13329800/- against the market value as per stamp duty valuation authority of Rs. 15698500/-. Thus there is a difference of Rs. 2368700/- attract the provision of section 56(2)(vii)(b) of the Income Tax Act, 1961 and needs to be taxed accordingly. The value adopted for Stamp Duty is considered and in assessee’s case, being a Non-filer for AY 2017-18, the source of entire transaction remains unexplained. Thus, provisions of Section 56(2)(vii)(b) are attracted. In this regard, the income of Rs. 1,56,98,500/- has escaped assessment and the same needs to be brought to tax.”

2.2. Synopsis of all submissions of the assessee relating to the issue and indicating the date of submission

Assessee has neither responded to notice u/s 142(1) nor to any reminder letter issued to him. A letter dated 31/01/2023 was issued to the assessee with compliance date as 15/02/2023 requesting why the case should not be completed with the information available with the department u/s 144 of the Income Tax Act. A show cause notice dated 27/02/2023 was also sent but no response has been received.

2.3. Summary of information/evidence collected which proposed to be used against it.

As per information with the department, *“The assessee has not filed return of income for A.Y.2017-18. Subsequently, information has been received from the office of the I&CI, Mumbai during March 2019 that the assessee has purchased an immovable property for a purchase consideration of Rs. 13329800/- against the market value as per stamp duty valuation authority of Rs. 15698500/-. Thus there is a difference of Rs. 2368700/- attract the provision of section 56(2)(vii)(b) of the Income Tax Act, 1961 and needs to be taxed accordingly. The value adopted for Stamp Duty is considered and in assessee’s case, being a Non-filer for AY 2017-18, the source of entire transaction remains unexplained. Thus, provisions of Section 56(2)(vii)(b) are attracted. In this regard, the income of Rs. 1,56,98,500/- has escaped assessment and the same needs to be brought to tax.”*

As the assessee is a non-filer and purchased a property worth Rs. 1,56,98,500/- as per Stamp duty Value while purchase consideration is Rs. 13329800/-, the whole amount of Rs. 1,56,98,500/- is proposed to be treated as unexplained income.

Proposed Addition: Rs. 1,56,98,500/-

This is proposed to be assessed. Penalty proceeding u/s. 271AAC(1) of the Income Tax Act, 1961 will be initiated for unexplained investment u/s 69 of the Income Tax Act. Penalty proceedings u/s. 272A(1)(d) of the Income Tax Act, 1961 will be initiated for not complying to the Notice u/s.142(1) of the Income Tax Act, 1961.

5. You are hereby given an opportunity to show cause as to why the assessment should not be

completed under section 144 of the Income-tax Act, 1961 in view of the above facts and circumstances of the case.

6. Kindly submit your response through your registered e-filing account at www.incometax.gov.in by 11:00 hours of 22/03/2023,

7. In case no response is received by the given time and date, the assessment shall be finalized under section 144, of the Income-tax Act to the best of judgement and on this basis of material available on records.

Assessment Unit
Income Tax Department

