

IN THE INCOME TAX APPELLATE TRIBUNAL "A" BENCH: KOLKATA

Before: **Shri P.M. Jagtap, Accountant Member** and
Shri S.S. Viswanethra Ravi, Judicial Member

I.T.A No. 2826/Kol/2013

Assessment Year: 2009-10

Sreema Mahila Samity

PAN: AAAAS4589H.

Appellant

Vs

**Deputy Commissioner of
Income-tax, Circle-Nadia.**

Respondent

For the Appellant : S/Shri K.M. Roy &
P.S. Gupta, Id.ARs,ADvocate
For the Respondent : Shri Sallong Yaden, Addl.CIT, Id.Sr.DR

Date of hearing : 26-07-2017

Date of pronouncement : 13-10-2017

ORDER

Shri S.S.Viswanethra Ravi, JM:

This appeal by Assessee is arising out of order dated 17-10-2013 of CIT(A), XXXVI, Kolkata for the assessment year 2009-10.

2. Ground nos. 1 to 4 are general in nature raised questioning the answer of the CIT-A and needs no adjudication. Hence, they are dismissed.

3. Ground no. 5 is relating to additions of Rs.71,68,803/- and Rs.38,27,197/- made on account of income from micro finance and provision for doubtful debts respectively.

4. The brief facts of the case are that the assessee is a charitable institution and declared total income as Nil. Notice u/s. 143(2) of the

Act was issued. In response to which, an AR appeared from time to time and the case was discussed.

5. During the course of assessment proceedings the AO opined that the assessee carried money lending business through its 11 branches in Nadia District and provided loan to general public and self help group (SHG) to a sum of Rs.11,76,58,642/- and earned interest income of Rs. 3,15,52, 949/-. The AO was of the opinion that the assessee carried an activity in the nature of trade, commerce or business and not being the charitable object, show caused why the profits generated in the form of interest from money lending business shall not be treated as income. For which, the assessee filed written submission and placed reliance on the decisions in the cases of Disha India Micro Credit Vs. CIT of Delhi Tribunal (ITAT,Delhi) Spandana Vs. ACIT reported in (2010) 40 DTR 153 (visakha) (Trib), ADIT (E) Vs. Bharatha Swamukhi Samasthe [2009] 28 DTR 13 (Bangalore Tribunal] and Thiagarjar Charitis Vs. ACIT (1997) 092 Taxman 152 (SC) Barda Samity and Tia Gaja Charitis of Hon'ble Supreme Court. Relevant portion of AO's order is reproduced herein below:-

5. Assessee's reply.

Sri S.N.Saha, the A/R, submitted one written statement as below:

"With reference to your show cause notice No. DCIT/Nadia/2011-12/286 dated 11.11.2011, it is informed you that the Assessee was registered during the year, 1972 under the Society's Registration Act, 1961 and since that year the Assessee was engaged with the Charitable Activities which includes, relief of the Poor, Education, Medical Relief & other object of General Public utility with the own finance (from donation received) & from the grant received from Foreign Contribution as well as India Government.

To give better service to large number of poor persons in their villages, towns etc. for income generation and to help them and their family to rise out of poverty the Assessee was engaged in activities of promoting micro finance services during the year, 2000 as permitted from time to time by the Reserve Bank of India.

The assessee was providing micro financial services as per the guide lines given by the Reserve Bank of India. Further the assessee had made application for financial assistance under micro scheme to United Bank of India, State Bank of India, SIDBI, AXIS Bank, CARE & NABARD who sanctioned to the Assessee loan for financing the project under Micro Credit Scheme with certain conditions and stipulations which had been duly complied with by the Assessee.

There was a surplus of Rs.74,70,327.00 as disclosed by you in your show cause notice of Micro Finance Activity which was not distributed amongst the members but have been utilized towards exclusively to large number of poor persons in their villages, town etc. for income generation and thus to help them and their fan Lily to rise out or poverty, not with motive of Profit.

However Micro Finance Activity is a charitable activity as it alleviates poverty and also benefits Socio Economically Weaker Sections of the society and surplus earned from Micro Finance Activity also is exempted u/ s. 11 of the Income Tax Act.

Various case laws in favour of NGO engaged in Micro Finance Activities are given below.

1) DISHA INDIA MICRO CREDIT V. CIT-
January 28, 2011 (ITAT - DEL)

Section 2 (15) read with section 12A/12AA of the Income Tax Act 1961 - Charitable purpose.

Activities of Promoting Micro Finance Services as permitted from time to time by the Reserve Bank of India, exclusively to large number of poor persons in their villages, towns etc. for income generation & thus to help them and their family to rise out of poverty, not with motive of profit can be considered to be, charitable purpose within the meaning of section 2 (15).

It is well settled that when a profit is used towards the achievement of the charitable objects of the trust, it would be considered to be incidental to the achievements of objects of the trust notwithstanding the profit and gain involved therein. Merely, because there was a surplus from the activity of micro financing, that by itself could not be a ground to say that the assessee did not exist for charitable purpose particularly when under the Memorandum of Association and Articles of Association, it has been clearly provided that the profit would not be distributed amongst the members but shall be utilized towards its objects.

2) *The Visakhapatnam, Income Tax Appellant Tribunal in the case of SPANDANA Vs ACIT (2010) 40 DTR 153 (Visakha) (Trib) held that microfinance activity is a charitable activity as it alleviates poverty and also benefits socio-economically weaker sections of the society.*

The Tribunal held that the Microfinance activity was charitable in nature because of the following reasons :-

- i) The loan is advanced to weaker sections of the society to meet their urgent needs.*
- ii) Even if reasonable or slightly higher interest is charged, it cannot be held uncharitable because the cost of recovery is very high and the possibility of bad debt is also high.*
- iii) The funds are given without any surety or guarantee.*

Some relevant extract from the case are provided as under :

Microfinance activity requires an organized sector for procuring a loan from banks or other financial institutions for its disbursement/ advancement of loan to poor or weaker sections of the society in which the assessee has to incur a lot of expenditure. Moreover, when a loan was given to the poor women, they do not have any surety or guarantee to stand and most of the times the loan could not be recovered from them and that aspect is also to be taken into account by the assessee

while granting a loan to the poor woman. No doubt assessee is that charging higher rate of interest from the poor women or the downtrodden or socio-economically weaker section of the society. The reason behind is that most of the time the assessee could not recover the loan from these poor and weaker sections of the society, besides incurring heavy expenditure in maintaining the organized sector. These poor and weaker sections happily agreed with the assessee for loan at higher rate, assessee has accomplished its object of microfinance to the socio-economically weaker sections of the society and also to alleviate poverty beside collecting the interest on the advancement loan. Moreover, this fund was advanced for a shorter period and the assessee has also earned an interest thereon which was utilized in micro financing activity to the poor people.

3) ADIT (E) Vs. Bharatha Swamukhi Samsthe [2009]28 DTR 13 (Bangalore Tribunal) It was held that the work of lending money to poor women for income generating activities was charitable in nature as there was nothing on record to show that the interest charged by the assessee was exorbitant. The following extract from the case is crucial to understand the statutory and judicial interpretations in the regard:

It is not in dispute that the assessee's work is lending money to the poor women for income generating activities. The loan given to project members are borrowed from bank; The beneficiaries are poor families. If the women in the assessee's project have to borrow money from the money lenders they have to pay many times higher interest than what the assessee has charged. It is also not in dispute that the assessee incurs financial costs for obtaining loans from banks. The assessee also has to make payment towards salaries and other administrative activities of the Trust. There is nothing on record to suggest that the assets and income of the trust were available for the personal benefit of the trustee and the board members. These are only used for micro credit to poor women for their poverty alleviation and for the benefit of the socio-economically weaker sections of the society.

It is well settled that when a profit is used towards the achievement of the charitable objects of the trust, it would be considered as charitable activities of the trust notwithstanding the profit and gain involved therein. In this respect, a reference may be made to the decision of Hon'ble Supreme Court in the case of Asstt. CIT Vs. Thanthi Trust (2001) 247 ITR 785 (sq). Thus, mere because there was a surplus from the activity of micro financing, that by itself, cannot be a ground to say that the assessee does not exist for charitable purpose particularly when under Memorandum of Association and

Articles of Association, it has been clearly provided that the profit shall not be distributed amongst the members but shall be utilized towards its objects.

4) Business Activities involving poor & Beneficiaries

The Supreme Court in case THIAGARAIAR CHARITIES V ACIT (1997) 092 TAXMAN 152 (SC) has held that business involving the poor beneficiaries cannot be said as business or activity for Profit.

Business Activity involving the beneficiaries and done only with the motive of providing relief to the poor, can be considered as business at all.

It may further be noted that micro finance as an incidental business activity and a charitable activity are two different issues. An NGO shall be exempted only if it is engaged in microfinance as a charitable activity. If an NGO is engaged in microfinance as an incidental business activity, then it will be subjected to the recent amendments to section 2 (15) and such microfinance activity should be only a small portion of its overall activities.

From the above clarification and from the recent Income Tax cases, it is clearly stated that the Microfinance activities of the Assessee is a charitable activities and surplus earned is exempted u/ s.11 of the Act and the assessee has not lost the status of charitable organization. So no question of charging of tax on the surplus of the Microfinance activities is arise.

The Assessee has maintained proper books of accounts which have been Audited regularly.

As per Schedule 15 of the Audited Statement of Accounts, the expenditure was financial expenses that is interest on borrowings which have been charged by UBI, UTI, SIDBL SBI, NABARD & CARE and were reflected in the Bank statement. The total amount was Rs.1,10,17,453.52. In addition, interest paid on members savings was Rs.5,06,398.00 & others were Bank Charges & Client Incentive.

6. The AO, however, taking into consideration the amendment to section 2(15) of the Act, which came into force from A.Y 2009-10, applicable to the year under consideration held that the money lending business and earning interest thereon is an income and facts in the advancement of any other object general public utility and it shall not be a charitable purpose and added the excess income over expenditure under head micro finance/money lending to an extent of Rs.71,68,803/- to the total income of the assessee.

7. Aggrieved, the assessee challenged the assessment order in respect of addition made on account of interest income before the CIT-A. Before him the assessee reiterated the same submissions as made before the AO. The CIT-A opined that the facts of the present case are similar to the facts of the case in Janalakshmi Social Services Vs. Director of Income-tax (Exemption) of Bangalore Tribunal reported in 33SOT 197(Bang) and held that loans have been raised in commercial lines and profit is generated by financing small

help groups at higher rates and interest earned on commercial lines and confirmed the order of the AO. Relevant finding of the CIT-A is reproduced herein below:-

"4.2 In the case of the appellant also the borrowing is not made directly to the beneficiaries. In fact financing is done to various SHG's. Here also no assistance or grant has been received for micro financing. The loans have been raised on commercial lines. Profit is generated by financing the SHG's at a higher rate. Therefore the micro financing business is run on commercial lines. Appellants reliance on Disha India Micro Credit vs. CIT, Muzaffarnagar ITA No. 1374/De1I2010 and other cases is misplaced.

In those cases the issue was whether registration u/s. 12A was to be granted. Secondly in those cases the financing was done directly to the poor beneficiaries and not SHG. In fact the Hon'ble IT A T in the case of Disha India Micro Credit Vs CIT (Supra), in its order while distinguishing the case on facts from Janalakshmi Social Services vs. DIT(Exemption) had stated the same. The relevant portion from the order is quoted as under :-

"We have carefully perused the aforesaid decision in the case of Janalakshmi Social Services (Supra). In this case, we find that the assessee was providing finance to a particular section of society i. e. traders dealing in vegetables and fruits, and making purchases from Safal. The assessee was availing of loan facility from Banks/Financial Institution at interest rates ranging from 8.5 per cent to 9 per cent and such loan facility was extended to so called poor people in urban areas at rates ranging between 18% to 24% per annum in addition to burden of processing and service charges between 1 to 2 per cent. It was also found in that case that the assessee company was not reaching to individual beneficiaries directly but was doing so through NGOs and SHGs from whom it charges high interest rate. It was thus, held that the assessee was undertaking only business of micro financing and had not done any activity to show that it had been done as a charitable act. This case is totally distinguishable on facts from the facts of the present case. In the present case, it is not a case, where the assessee has been providing finance to a particular section of the society. The present case is not a case, where the assessee has been providing loan to individual beneficiaries not directly but through some mediator. "

4.3 In view of the above discussion the A.O. had correctly concluded that appellant had carried out the micro financing on commercial lines. Therefore, it is not covered under the definition of "charitable purpose", as applicable for the current year.

Further, as has been stated in the provisions of Section 2(15), the nature of activity has to be examined, whether it is for charitable purpose or not, irrespective of the nature of use or application, or retention, of the income from such activity. So, the A.O. had correctly concluded that the profit made from the micro financing activity is not exempt as per section 11 of the I.T. Act.

4.4 Further the provisions of amended section 2 (15) has been clarified in a circular, stating the conditions to be fulfilled.

Accordingly, as has been stated in the Circular no.11 of 2008 dated 19.12.2008:-

"2. The following implications arise from this amendment-

2.1 The newly inserted proviso to section 2(15) will not apply in respect of the first three limbs of section 2(15), i.e. relief of the poor, education or medical relief. Consequently, where the purpose of a trust or institution is relief of the poor, education or medical relief, it will constitute "charitable purpose" even if it incidentally involves the carrying on of commercial activities.

2.2 "Relief of the poor" encompasses a wide range of objects for the welfare of the economically and socially disadvantaged or needy. It will, therefore, include within its ambit purposes such as relief to destitute, orphans or the handicapped, disadvantaged women or children, small and marginal farmers, indigent artisans or senior citizens in need of aid. Entities who have these objects will continue to be eligible for exemption even if they incidentally carry on a commercial activity, subject, however, to the conditions stipulated under section 11 (4A) or the seventh proviso to section 10(23C) which are that-

(i) the business should be incidental to the attainment of the objectives of the entity, and (ii) separate books of account should be maintained in respect of such business.

Similarly, entities whose object is "education" or "medical relief" would also continue to be eligible for exemption as charitable institutions even if they incidentally carry on a commercial activity subject to the conditions mentioned above. "

Thus to be covered under the definition of relief to poor, the micro-financing should be incidental to the attainment of the objectives of the entity. In this case as seen from the Audited accounts, micro financing is the predominant activity.

8. Before us the Id.AR submits that the assessee is a charitable institution and conducting its business in providing loans to weaker sections. Without considering the same, the AO arbitrarily denied the allowances in view of amendment to section 2(15) of the Act. He further submits that the assessee was registered under the Society's Registration Act in the year 1972 and the assessee was granted registration u/s. 12A of the Act. Since then the assessee was engaged in charitable activities which includes relief of the poor, education, medical relief and other object of general public utility with the own finance i.e. donations and grants received foreign contribution and Govt. of India. The Id. AR submits that the assessee introduced self help group (SHG) as a corner stone of development, particularly women empowerment and promoted large number of small help groups (SHG) under the facilitation of NABARD & Care and linked them with local banks.

9. Since 2000-01 the assessee started lending to the small family group(SHG) for the purpose of on lending to their members who are in need of capital for income generating activities with the aim to raise family income above subsistence level. The assessee started microfinance for economic self reliance and empowerment of the poor so that they become out of poverty in course of time. The assessee acted as an intermediary between bank and the poor to fulfill its social agenda by uplifting the socio- economic condition of the poor and the assessee had no profit making goal out of these activities.

10. The Id.AR submits that the moto of the assessee is "live and let live" and envisions a society where nobody exploits or feels

exploited and the mission is holistic development by acting locally, thinking globally. The assessee chosen the way of financing to the members of the groups directly to keep track on the individual loanee/borrower and their repayment habit. In support of which, he referred to paras 11, 12 & 13 of the written submissions and further argued that the assessee disbursed the loans on specific eligibility criteria. The assessee fixed the rate of interest of lending on the basis of RBI guidelines between the margin of lending and cost of fund that does not exceed 12% p.a. and must not exceed 26% p.a of the poorer. The Id.AR of the assessee also referred to paras 18-26 of the written submission basing on the procedures contemplated therein the assessee disbursed small amount of loan of Rs.5,000/- to Rs. 15,000/- to the poor women of the said 11 branches of Nadia District. The Id.AR also submits that because of higher interest is charged, then the activities of the assessee cannot be held uncharitable because the cost of recovery is very high and the possibility of bad debt is also high. The funds are given without any surety or guarantee.

11. The Id. AR submits that the proviso to section 2(15) of the Act does not apply in respect of first three limbs of section 2(15), where the purpose of the trust/institution is relief of the poor, education or medical relief it will constitute 'charitable purpose even if it incidentally involves the carrying on of commercial activities' as per CBDT Circular No.11/2008 dt. 19-12-08. The CIT-A failed to understand the restriction of the amount of Rs. 10,00,000/- in relation of the advancement of any other object of 'general public utility'. The Id.AR argued that the claim of the assessee having charitable activities was denied completely as bad in law and void an initio and the registration u/s. 12AA of the Act is in operation and should be treated as a society having charitable activity like relief of the poor and the expenses toward charitable activities should be

considered and allowed as application of income towards charitable activities and placed his reliance. In support of the contention, he relied on the order of Visakhapatnam Tribunal in the case of Spandana (Rural & Urban Development Organisation) Vs. ACIT reported in (2010) 40 DTE 153 (Viskha-Trib) and argued that micro finance activity is a charitable activity and socio-economically weaker sections of the society. He further submits that the AO has no power to deny the right of claim of exemption u/s. 11 of the Act, in view of the fact that the assessee trust obtained registration u/s. 12AA of the Act and income of the assessee should be treated/determined as Nil.

12. The Id.AR of the assessee placed his reliance on the order of the Bangalore Tribunal in the case of ADIT(E) Vs. Bharatha Swamukhi Samasthe reported in (2009) 28 DTR 13 (Bangalore-Trib) and argued that work of lending money to poor women for income generating activities was charitable in nature.

13. The Id.AR of the assessee further placed his reliance on the order of the Madhya Pradesh High Court in the case of Madhya Pradesh Madhyam Vs. CIT reported in (2002) 256 ITR 277/125 Taxman 382(MP) and argued that Income-tax Authorities are bound by Registration, once they have registered an institution as charitable one, they cannot go behind the registration in assessment proceedings, unless it is conclusively settled that the said organization is engaged in the business activities.

14. In the case of Surat City Gymkhana reported in (2008) 300 ITR 214/170 Taxman 612 (SC), the Id.AR argued the Supreme Court held that once registration is provided then the AO cannot probe into the objects of the society.

15. In the case of Hiralal Bhagwati reported in (2000) 246 ITR 188(Guj), the Id.AR argued that once the registration u/s. 12A(a) was granted, the grant of benefit/exemptions could not be denied.

16. In the case of U.P Forest Corprn reported in (2008) 297 ITR 1/165 Taxman 533(SC), Ld. AR argued that the Hon'ble SC held that once an order of registration u/s. 12AA is passed by the CIT, the entire income of the trust becomes exempt under the provisions of sections 11 and 12 of the Act, because registration of a Trust is a condition precedent for claiming benefit u/s. 11(1)(a) of the Act.

17. The Id.AR of the assessee placing his reliance in the case of Ahmedabad Urban Development Authority Vs. DCIT (Exemption) reported in (2011) 335 ITR 575/ (2010) 233 CTR 407 (2010) 40 DTR 76 (Guj-HC) argued that if the 12A registration was not withdrawn on the date of assessment order then the income of the assessee was exempt in entirety.

18. The Id.AR of the assessee further relied on proposition of rule of consistency of the Hon'ble Supreme Court in the case of Radhasoami Satsang Vs. CIT reported in (1992) 193 ITR 321 (SC).

19. In the case of Shree Ram Memorial Foundation of Delhi High Court reported in (1985) 158 ITR 3, held that when a particular charity was recognized as such for several years and was carrying on the same object without any protest.

20. In view of above, the Id.AR of the assessee prayed that the principles laid down by the Hon'ble SC/High Courts in the cases of *supra* above the determining the income to the tune of Rs.59,05,970/- should be deleted in full by application of exemption u/s. 11 of the Act.

21. On the other hand, the Id.DR submits that the assessee is not giving loans directly to the beneficiaries and the AO found lending of finances to self help group was a pre-dominant activity and taking advantage of the poor families the assessee charged interest @ 24%. The CIT-A has rightly held that it is a commercial activity. The Id.DR relied on the orders of the AO & CIT-A.

22. Heard rival submissions and perused the record and considered the written submission. We find that the assessee declared in its audited accounts excess income over expenditure, but being charitable institution not offered the same to tax. The AO show caused the assessee by finding that the assessee earned interest income on money lending to small help group, which is not object of the assessee trust and why the said income should not be treated as income of the assessee trust and taking into consideration the submissions of the assessee and the amendment effected to section 2(15) of the Act the AO added the said income to the total income of the assessee. We note that the assessee is a charitable institution and exemptions claimed by it are available on certain conditions. The charitable purposes are defined u/s. 2(15) of the Act, where the section states exemption can be granted to the institutions, which are involved in charitable purposes viz. relief to poor, education, medical relief and advancement of any object of general public utility. But, however, an amendment came into force by the Finance Act 2008, wherein proviso was added to section 2(15) states that the advancement of any other object of general public utility shall not be charitable purpose if it involves carrying on any activity in the nature, trade, commerce or business or any activity of rendering in services in relation to trade, commerce or business. Therefore, the exemption is not available in view of adding of proviso to section 15 particularly the 4th limbs definition of the charitable purpose. We find that the

assessee did not lend loans to beneficiaries directly as it was advanced to various self help groups. The said loans also raised on commercial lines and the profit was being generated by levying higher rate of interest and CIT-A by distinguishing the case laws held that the said micro financing as conducted by the assessee was on commercial lines and confirmed the order of the AO denying the exemption in view of adding proviso to section 2(15) of the Act. The CIT-A also discussed and distinguished the decisions in the case of Disha India Micro Credit of Delhi Tribunal with that of Janalakshmi Social Services and held that the facts of Janalakshmi Social Services are clearly applicable to the case of hand and held that the assessee undertaken only business of micro financing and had not done any activity to show that it had been done as charitable act.

23. Before us the Id.AR placed his reliance on the decisions of various High Courts and Supreme Court and argued that the AO has no power to deny the exemption as registration u/s 12AA is in force. We find that the registration u/s. 12AA is granted subject to fulfillment of certain conditions contemplated in section 2(15) of the Act. Therefore, we are not in agreement with the arguments of the Id.AR that the AO has ignored the registration of the assessee granted u/s. 12AA of the Act in denying the claim of exemption. The Id.AR also argued that rule of consistency should be followed by placing his reliance on the decision of the Hon'ble SC in the case of Radha Swamy Satsang supra, which held that the AO should not interfere with the fundamental aspect permitting through the difference assessment years. In our opinion that prior to adding proviso to section 2(15), the entities which got registration u/s. 12AA engaged in commercial activity claimed exemption on the ground that such activities were for advancement of objects of general public utility in terms of 4th limb of definition to section 2(15) of the Act. We find that the said benefit was taken away by adding proviso to section

2(15) of the Act, wherein it explains that the advancement of any other object, general public utility shall not be charitable purpose. In our opinion that the AO and the CIT-A opined that the assessee conducted its activities on commercial line in the nature of trade, commerce or business. Therefore, they rightly denied the exemption by following statutory provisions. We do not find any infirmity in the impugned order of the CIT-A. We find that the ratio laid down by the decisions as relied upon by the Id.AR are not applicable to the facts of this case. We uphold the same. This issue of the assessee is dismissed.

24. Regarding the claim of provision for bad & doubtful debts, the AO denied the claim of the assessee for a sum of Rs.38,27,197/- as is not deductible. The CIT-A observed in his order that the assessee failed to fulfill the conditions contemplated u/s. 36(2) of the Act.

25. We find that the assessee has shown other receipts of Rs.70,49,240/- which includes provision for bad and doubtful debt of last year (Schedule 11 & 14) of Rs.53,60,345/-. The assessee in its written submission stated that cost of recovery is very high and the possibility of bad debt is also high as the loans were advanced without any surety or guarantee. We find from the record that the assessee has shown a provision of bad and doubtful debt in the last year for a sum of Rs.53,61,345/-, which is more than the amount in the year under consideration and the AO has already deducted the same while computing the income of the assessee for the year under consideration. The assessee, therefore, cannot be said to have any grievance of the assessee on this issue.

26. Ground no. 6 is relating to an addition of Rs.2,15,548/- and Rs.29,077/- on account of foreign grant and local grant respectively. The Id.AR did not put forth any arguments on this issue. We find no

submissions were made in written submission. Therefore, ground no. 6 is dismissed.

27. In the result, the appeal of the assessee is dismissed.
Order pronounced in the open court on 13-10-2017

Sd/-
P.M. Jagtap
Accountant Member

Sd/-
S.S. Viswanethra Ravi
Judicial Member

Dated :13-10-2017

PP(Sr.P.S.)

Copy of the order forwarded to:

1. Appellant – Sreema Mahila Samity C/o P.S Gupta (Advocate),
100, Bank Lane, Hatar Para, P.O Krishnagar, Dist: Nadia, Pin 741101.
2. Respondent – The DCIT, Cir-Nadia, P.O Krishnagar, Dist: Nadia,
Pin 741101.
3. The CIT(A), Kolkata
4. CIT , Kolkata
5. DR, Kolkata Benches, Kolkata

/True Copy,

By order,

Sr.PS/H.O.O
ITAT, Kolkata