



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT



To,
BASUKINATH SHIV MANDIR NYAS SAMITY
- BASUKINATH TEMPLE, BASUKINATH DUMKA
DUMKA 814101, Jharkhand
India

PAN: AACTB3742N	Assessment Year: 2019-20	Date : 11/06/2024	DIN : ITBA/PNL/F/271AAC(1)/2024- 25/1065543082(1)
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Show Cause Notice for penalty under section 271AAC(1) of the Income-tax Act, 1961

Ms/Mr/M/s,

Faceless Penalty Scheme launched on 12/01/2021 has been amended by Faceless Penalty (Amendment) scheme, 2022 on 27.05.2022. All assigned penalties will be disposed of in a faceless manner similar to that in Faceless Assessment.

2. Kindly refer to penalty proceedings under section **271AAC(1)** initiated vide notice dated **08/03/2024** bearing DIN **ITBA/PNL/S/271AAC(1)/2023-24/1062221504(1)**, in your case for the aforementioned Assessment Year.

3. You are required to show cause why order imposing penalty under section **271AAC(1)** of Income-tax Act, 1961 should not be passed, as initiated by the penalty notice referred above.

4. Kindly submit your response along with supporting documentary evidence(s) if any, electronically in 'e-Proceeding' facility through your account in e-filing website (www.incometax.gov.in) by the **11:00 AM** of **25/06/2024**.

5. If required, you may request for personal hearing so as to make oral submissions or present your case in addition to filing of written reply. Personal hearing shall be conducted exclusively through video conference.

6. In case you had requested for keeping the penalty proceedings in abeyance, you are requested to upload a copy of the said reply.

7. In case no response is received by the given time and date, the penalty order shall be passed without the benefit of your explanation.

Yours faithfully,

Assessment Unit
Income Tax Department

Note: Refer to Annexure for additional details, if any.



ANNEXURE

1. You have not filed return of income for the AY 2019-20. As per the information available on record, you made cash deposits of Rs.1,72,22,217/- in saving account with Axis Bank Limited. Assessment proceedings u/s 147 of the Income Tax Act, 1961 (hereinafter referred to as 'the Act') were initiated after passing order u/s 148A(d) of the Act on 30.03.2023. Since there was no response during the assessment proceedings, assessment order was passed ex-parte u/s 147 r.w.s 144 r.w.s 144B of the Act on 08.03.2024 by making the additions of (i) unexplained cash deposits of Rs.2,45,10,806/- in Axis Bank and Indian Bank (erstwhile Allahabad Bank) as unexplained money u/s 69A of the Act (ii) interest income of Rs.17,71,864/- under the head 'Income from other sources'. The total income was determined at Rs. 2,62,82,670/-. Since the income determined includes income u/s 69A of the Act chargeable to tax under the provisions of section 115BBE of the Act, you are liable to pay penalty, in addition to tax payable under section 115BBE of the Act , a sum computed at the rate of ten per cent of the tax payable under clause (i) of sub-section (1) of section 115BBE of the Act.
2. Accordingly, the penalty proceedings were initiated u/s 271AAC(1) of the Act by issue of Show Cause notice u/s 274 r.w.s 271AAC(1) of the Act on 08.03.2024. There was no reply from you to this notice. As per the information available on record , you have not preferred any appeal till date.
3. In adherence to the principles of natural justice, you are once again requested to show cause as to why the order imposing penalty of 10% of tax payable on income determined u/s 69A of the Act chargeable to tax under the provisions of 115BBE of the Act should not be passed. This may be considered as final opportunity. If no response is received by the date mentioned in this notice, the order imposing penalty shall be passed without giving any further opportunity.

Assessment Unit
Income Tax Department