



Moti B. Totlani

That where revenue recovered demand by adjusting refund amounts payable to assessee, assessee was entitled to refund of entire amount in excess of 20 per cent for relevant assessment years together with interest as appeal as filed and entire demand was in dispute. (Karnataka Golf Association v. Deputy Commissioner of Income-tax (Exemption) [2025] 174 taxmann.com 1023 (Karnataka) – APRIL 24, 2025) That Assessing Officer noted that certain purchases made by assessee were bogus he added/s 69C said amount - High Court by impugned order held that where there was no discrepancy between purchases shown by assessee and sales declared, entire amount of bogus purchases could not be treated as income of assessee and addition was to be limited to extent of bringing gross profit rate on purchases at same rate as applied in other genuine purchases - SLP dismissed both on ground of delay as well as on m.....