



Moti B. Totlani

That where reopening notice u/s 148 was issued on ground that amount of interest/bonus received by assessee on premature surrender of pension plan/ annuity policies of LIC which was claimed as exempt u/s 10(10D) by assessee was actually not exempted as per provision of section 80CCC(2), since no new/fresh tangible material came into possession of Assessing Officer subsequent to intimation u/s 143(1), impugned reopening notice issued against assessee after four years from relevant year was unjustified. (Ami Ashish Shah v. ITO 126 taxmann.com 236 (Gujarat) - MARCH 22, 2021) That where there were two PAN numbers allotted to assessee and it had filed its return of income in respect of one of PAN number without any default and it had already s.....