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%04.08.2009

Present: Mr. Sanjeev Sabharwal for the appellant

+ITA No. 504/2009

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Findings of fact are recorded by the two authorities below concurrently in favour of the assessee concluding that under Section 14A direct or indirect expenses relating to earning of exempt income is disallowable but disallowance cannot be on proportionate basis in proportion to divided income in certain expenses have been adjudicated. In another appeal raising identical issue was dismissed by this Court on 3.8.2009 following order dated 15.7.2009 passed in ITA No.803/2008 holding that these are pure questions of facts and no question of law arises.

Dismissed.


A.K.SIKRI, J
VALMIKI J. MEHTA, J

August 04, 2009

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