

Sonakshi Jhunjhunwala & Sunil Jhunjhunwala

Instructions to the AO's for initiating proceedings u/s 147 of I.T. Act, 1961 in e-Verification cases-reg: e-Verification Instruction No. 2(i) of 2024, dated 19th March, 2024 Directorate of Income Tax (Systems) issues clarificatory Instruction No. 2(i) of 2024 dated 19th March, 2024. This instruction is issued in connection with earlier Instruction No. 2 of 2024 dated 01st March, 2024 which was issued pursuant to CBDT's Notification No. 137/2021 dated 13th December, 2021 notifying the e-Verification Scheme, 2021 under Section 135A. Under Instruction No. 2 of 2024 dated 01st March, 2024, as required by Clause 4(9) of the said Scheme, CIT (e-Verification) matches the Preliminary Verification Report with the latest income-tax return to prepare the Final Verification Report (FVR) wherein Value at Risk (VaR) is arrived at. Based on this, certain High Risk Cases are identified for reopening under Section 147 of the Act.