

### Analysis

Singh Enterprises: Held: “Assessee had claimed brokerage deduction out of the total rent received by him from the assessee, which was disallowed as not admissible under Section 23(1) of the Income Tax Act. However, on that basis, we are of the opinion that penalty proceedings could not have been initiated by the assessee, as it was not the case of giving wrong particulars or concealment of any particulars inasmuch as complete information and particulars about the rent received and the brokerage claimed were given...”