PR. COMMISSIONER OF INCOME TAX CENTRAL-3, NEW DELHI v. M/S. JACARANDA CAPITAL LTD.

ITA 665/2026

ITA 665/2026 (Delhi High Court, 14 September 2026) | 2026-09-14

Rs. 6 lakh deletion upheld on factual appreciation and smallness of amount

High Court of Delhi | Division Bench | Dinesh Mehta | Rajneesh Kumar Gupta

Assessment years:

01 FACTS OF THE CASE

The Tribunal allowed Jacaranda Capital's appeal and deleted an addition of Rs.6,00,000 made by the Assessing Officer on the ground of an accommodation entry and affirmed by the first appellate authority. Revenue appealed that relief.

Source: Para 1, PDF p.1

02 DISCUSSION BY THE HON'BLE COURT

After hearing Revenue, the Court found that the Tribunal had aptly considered and appreciated the material and that its conclusion was essentially factual. It additionally considered the small amount of the addition and found no fit ground for interference.

Source: Para 2, PDF pp.1–2

03 JUDICIAL DECISION

Revenue's appeal and the pending application were dismissed.

Source: Para 2, PDF p.2

04 OUTCOME / IN WHOSE FAVOUR

Final assessee-favourable refusal to disturb the Tribunal's deletion. The Court relied on factual appreciation and smallness of the addition; it did not cite a CBDT monetary-limit circular or hold every alleged accommodation entry genuine.

Source: Paras 1–2, PDF pp.1–2

05 EXPERT COMMENTS

Do not substitute an assumed circular for the stated reasons — The order mentions the small addition but does not identify a circular, tax-effect calculation or litigation threshold. It first accepts the Tribunal's factual appreciation. Classifying it solely as a prescribed monetary-limit withdrawal would erase that distinct rationale.

The alleged entry and the appellate finding are different stages — Accommodation entry describes the Assessing Officer's ground, which CIT(A) upheld and the Tribunal rejected. The High Court declined interference with the latter result. The brief order does not set out the evidence or announce a general test for proving creditworthiness or genuineness.

Avoid invented reassessment particulars — Neither AY 2018-19 nor section 148 appears in the source. The correct record is this Rs.6,00,000 factual appeal, heard by Dinesh Mehta and Rajneesh Kumar Gupta on 14 September 2026. Any wider procedural history needs a separate source.

Source: Editorial analysis; source references in the structured comments

SOURCE & VERIFICATION

High Court of Delhi official judgment PDF (DLHC011323142024_1_2026-09-14.pdf)

2-page official High Court of Delhi judgment PDF (DLHC011323142024_1_2026-09-14.pdf).

All 2 original pages read and visually inspected; source hash verified. AI-assisted substantive correction.

Open cited source rendition

Source bytes and identity checked; see panel-specific references and disclosed source anomalies.

STATUTORY SCOPE

This short order does not specify the assessment year or statutory provision for the addition. No provision or 2025 Act equivalence is inferred.

LATER TREATMENT

Source checked 2026-10-21. Subsequent treatment not independently verified.

AI DISCLOSURE

AI-assisted research checked against the identified source. Extraction, interpretation or omission errors remain possible. Source review does not mean independent approval by a practising professional. Verify every material statement against the complete original judgment.

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