Principal Commissioner of Income Tax (Central)-3, New Delhi v. Olive Overseas Private Limited

ITA 780/2026 & ITA 783/2026

ITA 780/2026 & ITA 783/2026 (CNR: DLHC011107502025 & DLHC011107542025) (Delhi HC, decided 2026-09-28) | 2026-09-28

Olive Overseas: section 153A appeals for AYs 2012–13 and 2014–15 disposed of following Anand Kumar Jain (HUF); quoted precedent facts kept distinct.

Income-tax Act, 1961: sections 153A, 260A; section 132(4) in quoted precedent

High Court of Delhi | 2-judge bench (Division Bench) | Justice Subramonium Prasad | Justice Renu Bhatnagar

Assessment years: 2012-13, 2014-15

Quoted precedent facts are not separate findings about Olive

The long extract includes both section 153A and historical Chapter XIV-B discussion. It must not be converted into an independent finding that every quoted event occurred in these two assessments.

01 FACTS OF THE CASE

Revenue challenged the ITAT order of 8 October 2024 in ITA 3310/DEL/2023 for AY 2012–13 and ITA 3331/DEL/2023 for AY 2014–15. The Tribunal had allowed Olive's appeals and deleted section 153A additions. The present Court stated that the issue was covered against Revenue by Anand Kumar Jain (HUF).

Source: PDF p.2

02 DISCUSSION BY THE HON'BLE COURT

The Court reproduced paragraphs 7–9 of Anand Kumar Jain (HUF), including nested discussion of Kabul Chawla, Best Infrastructure and Harjeev Aggarwal. The quotation distinguishes evidential relevance of a statement from its sufficiency, by itself, for search additions to completed assessments. Mr. Jindal's statement, denial and cross-examination discussion are narrated in the quoted precedent; the present order does not separately establish those details as Olive's own facts.

Source: PDF p.2

03 JUDICIAL DECISION

Following PCIT (Central)-3 v. Anand Kumar Jain (HUF), the High Court disposed of both appeals against the Revenue.

Source: PDF p. 7, para 6

04 OUTCOME / IN WHOSE FAVOUR

Both appeals were disposed of following a precedent expressly stated to cover the issue against Revenue. The Tribunal's deletion remained undisturbed.

Source: PDF p.7

05 EXPERT COMMENTS

Attribute the long quotation correctly — Mr. Jindal's statement and the specific denial appear in Anand Kumar Jain's reproduced reasoning. They are not independently narrated as Olive's events. Keeping the attribution prevents importing another taxpayer's evidence into this record.

Relevance differs from sufficiency — The adopted reasoning recognises a statement's evidential value but rejects standalone reliance in the described search-assessment context. It does not make every statement inadmissible or prevent use with relevant corroborating material.

Keep statutory regimes and years separate — The nested Harjeev passage discusses historical Chapter XIV-B, while Olive's appeals concern section 153A and two identified years. Apply the reasoning with its completed-assessment context rather than erase these distinctions.

Source: PDF p.2

SOURCE & VERIFICATION

High Court of Delhi official judgment PDF - AKHB Repository (DLHC011107502025_1_2026-09-28.pdf)

7-page official High Court of Delhi judgment PDF (DLHC011107502025_1_2026-09-28.pdf, 213,424 bytes).

Complete source text and every original page visually reviewed; identity and SHA-256 checked. AI-assisted source analysis.

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STATUTORY SCOPE

Applies Sections 132(4) and 153A of the Income-tax Act, 1961 for AYs 2012-13 and 2014-15. Income-tax Act, 2025 equivalence is not verified.

LATER TREATMENT

Source checked 2026-10-21. Subsequent judicial treatment has not been 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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