

Principal Commissioner of Income Tax-10 v. Bal Kishan Arora

ITA 124/2026; CM APPL. 9589/2026 and 50835/2026

2026:DHC:7627-DB | ITA 124/2026, CM APPL. 10772/2026 & CM APPL. 10773/2026 (Del HC, decided 29.09.2026) | 2026-09-29

Revenue appeal challenging ITAT order on long-term capital gains / penny-stock addition dismissed as squarely covered by PCIT-12 v. Smt. Krishna Devi, (2021) 126 taxmann.com 80 (Delhi).

Income-tax Act, 1961: sections 10(38), 68 and 260A

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

Assessment years: Not specified in order text

Short 1-page oral order following Smt. Krishna Devi

The order is a brief 1-page disposal recording the concession of Revenue's counsel that the appeal is covered by PCIT-12 v. Smt. Krishna Devi, (2021) 126 taxmann.com 80 (Delhi).

01 FACTS OF THE CASE

The Principal Commissioner of Income Tax-10 filed ITA 124/2026 under section 260A of the Income-tax Act, 1961 challenging the order of the Income Tax Appellate Tribunal in favour of the respondent-assessee, Bal Kishan Arora.

Source: [Page 1 of 1 \(Header and Paragraph 1\) \(DLHC011097502025_1_2026-09-29.pdf\)](#)

02 DISCUSSION BY THE HON'BLE COURT

At the outset of the hearing, counsel for the Revenue fairly stated that the controversy raised in the appeal stood covered on all fours by the judgment of the coordinate Bench of the Delhi High Court in Principal Commissioner of Income Tax-12 v. Smt. Krishna Devi, (2021) 126 taxmann.com 80 (Delhi), against which the Revenue's Special Leave Petition had also been dismissed by the Supreme Court.

Source: [Page 1 of 1 \(Paragraph 1\) \(DLHC011097502025_1_2026-09-29.pdf\)](#)

03 JUDICIAL DECISION

Recording that the issue was covered by PCIT-12 v. Smt. Krishna Devi, (2021) 126 taxmann.com 80 (Delhi) (as affirmed on dismissal of SLP by the Supreme Court), the Delhi High Court dismissed ITA 124/2026 along with CM APPL. 10772/2026 and CM APPL. 10773/2026.

Source: [Page 1 of 1 \(Paragraphs 2-3\) \(DLHC011097502025_1_2026-09-29.pdf\)](#)

04 OUTCOME / IN WHOSE FAVOUR

In favour of the assessee (Bal Kishan Arora); Revenue appeal ITA 124/2026 dismissed.

Source: [Page 1 of 1 \(Paragraphs 2-3\) \(DLHC011097502025_1_2026-09-29.pdf\)](#)

05 AKHB REVIEW POINT

AKHB analysis: The Delhi High Court continues to apply PCIT-12 v. Smt. Krishna Devi ((2021) 126 taxmann.com 80 (Delhi)) to dismiss departmental appeals under section 260A where additions against stock-exchange-traded LTCG claims rest solely on general astronomical price-rise theories without direct evidence implicating the assessee.

Source: [Full judgment PDF \(1 pp.\)](#)

SOURCE & VERIFICATION

[Original judgment PDF \(DLHC011097502025_1_2026-09-29.pdf\)](#)

Reviewed from the complete 1-page official High Court judgment PDF (DLHC011097502025_1_2026-09-29.pdf, SHA-256: a9b3937e912e1c4fefbc08d11de2c5a7eae6da39b9b8c73cf6e4abc4abb6537e).

Supplied source-reviewed note retained; original bytes and identity validation checked in this release. Substantive re-review is not claimed for this record.

Open cited source rendition

Primary source verified page-by-page (1 physical pages, 18,674 bytes, SHA-256: a9b3937e912e1c4fefbc08d11de2c5a7eae6da39b9b8c73cf6e4abc4abb6537e). Cloud Google Drive File ID: 13dW-Vqvz4CTROKsGI04UB0jbtAxxVK9 (<https://drive.google.com/file/d/13dW-Vqvz4CTROKsGI04UB0jbtAxxVK9/view>).

STATUTORY SCOPE

Refers to the Income-tax Act, 1961 and allied statutory rules/circulars as applicable to the relevant assessment years.

LATER TREATMENT

Source checked 2026-10-18. No subsequent Supreme Court reversal or stay is recorded in the source judgment text.

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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