

Pancham Singh

ITA No.462/Pat/2025

ITAT - Patna | Source extract brief | 8 source pages

Selected passages, not a complete analytical case note. Read the complete source for context and attribution.

01 FACTS OF THE CASE

"This appeal filed by the assessee is directed against the order dated 29.08.2025 of the NFAC, Delhi ['CIT(A)'] passed under Section 250 of the Income-tax Act, 1961 (hereinafter referred to as "the Act"). 2. Brief facts of the case are that the appellant is an individual who had not filed his return of income for the A.Y. 2014-15. The Assessing Officer was having information that the appellant had entered into a LDA with M/s Sehra Real Estate Pvt Ltd. on 27/08/2013 for the development of his immovable property situated at Mauja Rukanpura, Thana No. 5, Circle Danapur, Patna, measuring approximately 7,405.2 sq. ft. Under the agreement, the assessee transferred development ..." (source PDF page 1)

02 DISCUSSION BY THE HON'BLE TRIBUNAL

"We have considered the submissions of the counsels of the respective parties and perused the materials on record. We find that the assessee entered into a registered agreement for development of his ancestral land on 27-08-2013 for the construction of residential building/apartment on the said land. On perusal of JDA, we find that nature of deed is "Development Agreement" and it clearly postulates that it is not the sale deed in which the land owner has relinquished his ownership. The land owner is continued to be the owner of the property throughout the development of the property and there is no transfer of ownership to the developer ..." (source PDF page 5)

03 JUDICIAL DECISION

"In the result, the appeal filed by the assessee is allowed. Kolkata, the 16th March, 2026." (source PDF page 8)

04 OUTCOME — IN FAVOUR OF

Assessee, for the issues disposed of in the quoted result. Check the full reasoning for whether relief is substantive or procedural, and verify subsequent proceedings before relying on it.

05 AKHB REVIEW POINT

Read the numbered grounds and operative reasoning together. Match the statutory provision, assessment year, jurisdiction and material facts before relying on this order; check later appeals, stays and amendments.

SOURCE & VERIFICATION

[Read the supplied court / tribunal copy \(PDF\)](#)

Page references refer to the supplied PDF, not an official reporter. Authenticity and subsequent case history require separate verification.

AI DISCLOSURE

AI-assisted source extract brief. Selection and extraction may contain errors or omit material context. The selected discussion passage may include a precedent quoted within the order. No independent professional approval is claimed. Verify the attribution, complete reasoning and every material statement against the original.

PROFESSIONAL DISCLAIMER

General research information only; not legal or tax advice, a certified judgment or a substitute for the full order. Applicability depends on facts, statutory version, assessment year and jurisdiction. Subsequent appeals, stays, reversals and amendments have not been checked. Downloading does not create a professional engagement. Obtain case-specific advice before reliance.