

**IN THE INCOME TAX APPELLATE TRIBUNAL
DELHI BENCH 'E', NEW DELHI**

**Before Sh. Satbeer Singh Godara, Judicial Member
&
Sh. S. Rifaur Rahman, Accountant Member**

ITA No. 1482/Del/2025 : Asstt. Year : 2017-18

Income Tax Officer, Ward-29(7), New Delhi-110002	Vs	Praveen Chaudhary, 39, Gadaipur, Mehrauli, New Delhi-110030
(APPELLANT)		(RESPONDENT)
PAN No. AAJPK6226H		

**Assessee by : Sh. Pranshu Goel, CA
Revenue by : Ms. Ankush Kalra, Sr. DR**

Date of Hearing: 08.01.2026	Date of Pronouncement: 08.01.2026
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ORDER

Per Satbeer Singh Godara, Judicial Member:

This Revenue's appeal for Assessment Year 2017-18, arises against the CIT(A)/NFAC, Delhi's DIN & order No. ITBA/NFAC/S/250/2024-25/1071038675(1) dated 09.12.2024, in proceedings u/s 143(3) of the Income Tax Act, 1961 (in short "the Act").

2. Heard both the parties at length. Case file perused.
3. Coming to the Revenue's sole substantive ground herein seeking to revive section 69A r.w.s 115BBE addition of Rs.80,15,000/-, it emerges at the outset that the tax effect involves in the Revenue's instant appeal is less than the

minimum prescribed limit of Rs.60 lakhs in the CBDT latest Circular No. 9/2024, dated 17.09.2024.

4. Learned departmental representative vehemently argues that the Revenue's Form-36 herein has computed tax effect of Rs.60,11,250/- in light of section 115BBE of the Act. We notice that case law S.M.I.L.E Microfinance Limited Vs. The ACIT CC-1 in W.P.(MD) No.2078 of 2020 & W.M.P. (MD) No. 1742 of 2020 has already settled the issue that the said provision applies for transactions done on or after 01.04.2017 only. We thus reject the Revenue's instant appeal as covered by the CBDT's foregoing circular in very terms.

5. This Revenue's appeal is dismissed in above terms.

Order Pronounced in the Open Court on 08/01/2026.

Sd/-

(S. Rifaur Rahman)
Accountant Member

Dated: 08/01/2026

Subodh Kumar, Sr. PS

Copy forwarded to:

1. Appellant
2. Respondent
3. CIT
4. CIT(Appeals)
5. DR: ITAT

Sd/-

(Satbeer Singh Godara)
Judicial Member

ASSISTANT REGISTRAR