

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

BEFORE SHRI SATBEER SINGH GODARA, JUDICIAL MEMBER, AND
SHRI NAVEEN CHANDRA, ACCOUNTANT MEMBER

ITA No. 1000/DEL/2025 [A.Y 2017-18]

The J.C.I.T., OSD
New Delhi

Vs.

Armstrong Agencies Pvt Ltd
D-14, NDSE Part II,
New Delhi

PAN: AAACA 5592 L

(Appellant)

(Respondent)

Assessee By : Shri Vikrant A. Maheshwari, Adv

Department By : Shri Ankush Kalra, Sr. DR

Date of Hearing : 12.01.2026

Date of Pronouncement : 16.01.2026

ORDER

PER NAVEEN CHANDRA, AM :-

This appeal by the Revenue is directed against the order of the Id.
CIT(A)-27, Delhi dated 27.12.2024 pertaining to A.Y 2017-18.

2. We have heard the rival submissions and have perused the relevant material on record. At the very outset, we find that after giving effect to the decision of the Hon'ble Karnataka High Court in the case of *S.M.I.L.E. Microfinance Ltd. Vs. ACIT*, W.P. (MD) No.2078 of 2020 &

1742 of 2020, dated 19.11.2024 (Madras) wherein the provisions of section 115BBE of the Income-tax Act, 1961 [the Act, for short] has been held as being applicable for transactions carried out from 01.04.2017 onwards. Applying the said decision in the case of the assessee, the remaining addition would render the tax effect as below the limit prescribed in the CBDT Circular No. 9/2024 dated 17.09.2024.

3. This appeal is, accordingly, dismissed with liberty to the revenue to approach the Tribunal as per the provisions of law, should it feel that the tax effect is more than Rs. 60 lakhs.

4. In the result, appeal of the Revenue in ITA No. 1000/DEL/2025 is dismissed.

Order pronounced in open court on 16.01.2026.

Sd/-

[SATBEER SINGH GODARA]
JUDICIAL MEMBER

Sd/-

[NAVEEN CHANDRA]
ACCOUNTANT MEMBER

Dated : 16th JANUARY, 2026.

VL/

Copy forwarded to:

1. Appellant
2. Respondent
3. CIT
4. CIT(A)
5. DR

Asst. Registrar,
ITAT, New Delhi

Sl No.	PARTICULARS	DATES
1.	<i>Date of dictation of Tribunal Order</i>	
2.	<i>Date on which the typed draft order is placed before the Dictating Member</i>	
3.	<i>Date on which the typed draft order is placed before the other Member [in case of DB]</i>	
4.	<i>Date on which the approved draft order comes to the Sr. P.S./P.S.</i>	
5.	<i>Date on which the fair Order is placed before the Dictating Member for sign</i>	
6.	<i>Date on which the fair order is placed before the other Member for sign [in case of DB]</i>	
7.	<i>Date on which the Order comes back to the Sr. P.S./P.S for uploading on ITAT website</i>	
8.	<i>Date of uploading, inf not, reason for not uploading</i>	
9.	<i>Date on which the file goes to the Bench Clerk</i>	
10.	<i>Date on which the file goes for Xerox</i>	
11.	<i>Date on which the file goes for endorsement</i>	
12.	<i>The date on which the file goes to the Superintendent for checking</i>	
13.	<i>Date on which the file goes to the Assistant Registrar for signature on the order</i>	
14.	<i>Date on which the file goes to the dispatch section for dispatch the Tribunal order</i>	
15.	<i>Date of Dispatch of the Order</i>	
16.	<i>Date on which the file goes to the Record Room after dispatch the order</i>	