

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

**Before Sh. Satbeer Singh Godara, Judicial Member**

**ITA No. 7452/Del/2025 : Asstt. Year: 2019-20**

Nitish Jain, 41, Bhogal Road, Jangpura, Bhogal, New Delhi-110014 (APPELLANT)	Vs	Income Tax Officer, Ward-54(1), New Delhi-110002 (RESPONDENT)
<b>PAN No. AHFPJ0396Q</b>		

**Assessee by: Sh. Raman Kumar Goyal, AR  
Revenue by : Sh. Manoj Kumar, Sr. DR**

<b>Date of Hearing: 20.01.2026</b>	<b>Date of Pronouncement: 20.01.2026</b>
------------------------------------	--

**ORDER**

This assessee's appeal for Assessment Year 2019-20 arises against the CIT(A)/NFAC, Delhi's DIN & order No. ITBA/NFAC/S/250/2025-26/1081417766(1) dated 03.10.2025, in proceedings u/s 147 of the Income Tax Act, 1961 (in short "the Act").

2. Heard both the parties at length. Case file perused.
3. It transpires during the course of hearing that the assessee/appellant is aggrieved against both the learned lower authorities respective findings holding him to have invested on-money of Rs.2,00,000/- with builder/developer M/s Omaxe Ltd. whilst purchasing a unit No. HFFC/Shop-65 in the project named Hi Fun Food Court, Faridabad; in assessment order dated 20.12.2024 and upheld in the lower appellate discussion.

4. Both the learned representatives vehemently reiterate their respective stands against and in support of the impugned addition. The Revenue more particularly seeks to buttress the point that the impugned addition has rightly been made in the assessee's hands since based on an excel sheet found/seized during the course of search at M/s Omaxe Ltd. It could hardly dispute that the said alleged excel sheet is only a self-contained document which is not even in the nature of either payment or a receipt coming at the assessee's behest. There is further no corroboration of the said excel sheet contents made by both the learned lower authorities. That being the case, no merit is found in the impugned addition of Rs.2,00,000/- which is hereby deleted in very terms.

5. This assessee's appeal is allowed.

Order Pronounced in the Open Court on 20/01/2026.

Sd/-  
**(Satbeer Singh Godara)**  
**Judicial Member**

**Dated: 20/01/2026**

\*Subodh Kumar, Sr. PS\*

Copy forwarded to:

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

**ASSISTANT REGISTRAR**