

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

**BEFORE SHRI MAHAVIR SINGH, HON'BLE VICE PRESIDENT
&
SMT. RENU JAUHRI, HON'BLE ACCOUNTANT MEMBER**

ITA No. **5411/DEL/2024**; Assessment Year: **2018-19**

Accord Electropower Pvt. Ltd. E-27 Site B Surajpur Industrial Area, Gautam Buddh Nagar Uttar Pradesh- 201308	Vs	ITO Ward 5(1)(1)
(APPELLANT)		(RESPONDENT)
PAN No. AANCA9034E		

Assessee Represented by : **None**
 Revenue/Department Represented by : **Ajay Kumar Arora, Sr. DR**

Date of Hearing: 28.01.2026	Date of Pronouncement: 28.01.2026
-----------------------------	-----------------------------------

ORDER

PER RENU JAUHRI :

The above captioned appeal is preferred by the assessee against the order dated 11.09.2025, passed by Ld. CIT(A)/NFAC, Delhi u/s 250 of the Income Tax Act, 1961 [hereinafter referred to as, "Act"] for A.Y. 2018-19 in Appeal No. NFAC/2017-18/10087520. The Assessment was framed by the Assessing Officer [for short, "AO"] u/s 143(3) r.w.s 144B of the Act, vide order dated 02.09.2021. s

2. Although the assessee has raised five grounds of appeals, the sole substantive issue involved relates to addition of Rs. 1,30,87,124/- u/s 68 of the Act by holding the purchase of shares of the assessee company by four individuals as non-genuine.

2.1 Briefly stated, the genuineness and creditworthiness of these shareholders were not proved, therefore, Ld. AO made the impugned addition u/s 68 in the hands of the assessee. During appellate proceedings, additional evidences were submitted by the assessee, in respect of which a remand report was sought from the Ld. AO. Based on the remand report, Ld. CIT(A) dismissed the assessee's appeal without considering the assessee's reply dated 06.09.2024 and has also not given any findings of his own as regards the merits of the issue.

3. After hearing the rival submissions and upon careful consideration of the material on record, we deem it appropriate to remand the matter to Ld. CIT(A) for fresh adjudication after considering the assessee's submissions and to pass a speaking order.

4. In the result, the appeal of the assessee is allowed for statistical purposes.

Order pronounced in the Open Court on 28-01-2026.

Sd/-
(MAHAVIR SINGH)
Vice President

Sd/-
(RENU JAUHRI)
Accountant Member

Dated: 09.02.2026

Pooja Mittal

Copy forwarded to:

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

Asstt. Registrar, ITAT, New Delhi