

HIGH COURT OF JUDICATURE FOR RAJASTHAN
BENCH AT JAIPUR

D.B. Income Tax Appeal No. 112/2025

The Principal Commissioner Of Income Tax

----Appellant

Versus

Amrapali Jewels Pvt. Ltd.

----Respondent

For Appellant(s) : Mr. Siddharth Bapna with
Ms. Tanushree Saxena

For Respondent(s) :

HON'BLE MR. JUSTICE INDERJEET SINGH
HON'BLE MR. JUSTICE ASHOK KUMAR JAIN

Order

15/04/2026

Heard.

This appeal is admitted on following substantial questions of law (A, B, C and D):-

(A) Whether on the facts and in the circumstances of the case and in law, the Hon'ble ITAT is justified in deleting the addition of Rs. 141,35,81,894/-, which was enhanced by the Ld.CIT(A) 146,31,52,182/-, made on to account Rs. of unaccounted investment u/s 69B of the I.T. Act without appreciating the fact that the assessee has failed to discharge its onus to give satisfactory explanation as mandated in section 69B of the Act?

(B) Whether on facts and in circumstances of the case, the Hon'ble ITAT is justified in restricting the addition of Rs. 24, 95, 17,849/- made by AO on account of unrecorded sales to Rs. 1,49,89,604/-without appreciating the facts that

the assessee had not provided any evidence the said sale was recorded in its regular books of accounts for the year under consideration during the assessment proceedings despite having provided sufficient opportunities?

(C) Whether on the facts and in circumstance in of the case, the Hon'ble ITAT is justified applying the G.P unrecorded sale of Rs.4,36,76,001/- without rate 34.32% on appreciating the facts that the assessee has not provided the details of expenses incurred on this sale as well as source of corresponding purchase?

(D) Whether on the facts and in the circumstances of the case and in law, the Hon'ble ITAT is justified in deleting the addition of Rs. 11,40,00,000/- made account of unrecorded sales of High Value Jewellery without appreciating relevant facts and circumstances of the case and solely relying on the affidavit filed by the assessee?

Issue notice to respondent(s).

(ASHOK KUMAR JAIN),J

(INDERJEET SINGH),J