



**IN THE HIGH COURT OF PUNJAB & HARYANA  
AT CHANDIGARH**

( Sr. No. 129 )

**CWP No.28727 of 2025**

**Date of decision: 25.09.2025**

**Janak Raj Mahajan**

.....Petitioner

*Versus*

**Union of India through its Secretary and others**

.....Respondents

**CORAM : HON'BLE MR. JUSTICE DEEPAK SIBAL**

**HON'BLE MS. JUSTICE LAPITA BANERJI**

Present : Mr. Reshabh Bajaj, Advocate for the petitioner.

Mr. Yogesh Putney, Senior Standing Counsel  
(appeared through video conferencing) and  
Mr. Vidul Kapoor, Junior Standing Counsel  
for the respondent(s)- Income Tax Department.

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**DEEPAK SIBAL, J. (Oral)**

**(1)** Learned counsel for the petitioner restricts his claim only to the challenge to the notice dated 10.06.2025 (Annexure P/4) issued to the petitioner by the respondents under Section 148 of the Income Tax Act, 1961.

**(2)** The primary ground of challenge raised by the petitioner is that the impugned notice has been issued by the Jurisdictional Assessing Officer which could have not been done because in terms of the notification dated 29.03.2022 (Annexure P/5), issued by the Ministry of Finance, Government



of India, the impugned notice could have been issued only by way of faceless assessment.

(3) In support of his afore submission, learned counsel for the petitioner places reliance on the following two judgments of this Court:-

- (i) CWP-15745-2024, titled ***Jatinder Singh Bhangu Vs. Union of India*** and others decided on 19.07.2024,
- (ii) CWP-21509-2023, titled ***Jasjit Singh Vs. Union of India and others*** decided on 29.07.2024.

(4) Learned counsel for the respondents does not dispute the fact that the case of the petitioner is covered in his favour by the law laid down through the aforesaid two judgments rendered by two different Co-ordinate Benches of this Court in ***Jatinder Singh Bhangu's*** and ***Jasjit Singh's*** cases (supra).

(5) In the light of the above, in terms of the law laid down in the cases of ***Jatinder Singh Bhangu*** and ***Jasjit Singh*** (supra), the impugned notice dated 10.06.2025 (Annexure P/4), issued by the Jurisdictional Assessing Officer, is hereby quashed with liberty to the respondents to proceed against the petitioner in accordance with law.

(6) The petition is allowed in the above terms.

(DEEPAK SIBAL)  
JUDGE

25.09.2025

*sunil yadav*

( LAPITA BANERJI )  
JUDGE

Whether speaking/reasoned : Yes / No

Whether reportable : Yes / No