

ORDER SHEET
IN THE HIGH COURT OF SINDH AT KARACHI

ITRA 512 of 2024

DATE	ORDER WITH SIGNATURE OF JUDGE(S)
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1. For orders on office objection No.7.
2. For orders on CMA No.4162/2024.
3. For hearing of main case.

12.05.2026

Mr. Abdul Raheem Lakhani, advocate for the applicant.

Para 10 of the impugned order reads as follows:

“10. It is clear from above that learned officer categorically held that infact imputable income as determined and declared by the appellant himself in his return of income has been taken by the learned officer for the purpose of charging super tax. That the dispute in relied case law was whether taking full value of share or imputable income for the purposes of super tax. The Hon’ble Court decided in favour of taking imputable income u/s. 2(28A) in case of FTR. While in the case in hand, the appellant himself has declared imputable income in his return which has been simply taken, as declared, by the learned officer. Neither the learned CIR(A) discussed / rebutted these findings of learned officer, nor the appellant recorded any objection on it in the grounds taken in appeal before the learned CIR(A). In our opinion, under the above stated circumstances, we find the findings of learned officer well in accordance with law and thus approved. Also it has been noted that the learned CIR(A) recorded his findings about acceptance of appellant’s stance in earlier proceedings u/s. 122(5A) completely ignoring the rebuttal of learned officer in his order, wherein he mentioned clearly that subject proceedings were closed without recording any findings whatsoever.”

The aforementioned findings appear to have been rendered on appreciation of evidence and the conclusion seems to be reasonable consequence. No argument is articulated before us to displace or distinguish the same. Since no question of law proposed / articulated arising here from meriting adjudication in reference jurisdiction, therefore, the reference application is dismissed in limine.

A copy of this decision may be sent under the seal of this Court and the signature of the Registrar to the learned Appellate Tribunal, as required per section 133(8) of the Income Tax Ordinance, 2001.

Judge

Judge