



1 Eshakti.com Pvt. Ltd. vs ACIT & CBDT, Hon'ble Madras High Court, W.P. Nos.1260 & 1264 of 2020 and WMP. Nos. 1521, 1522, 1524, 1525, 1053 & 1054 of 2020, order dt. 17.05.2021 Assessment – Procedure - Show cause notice – Though the Income Tax Act does not anywhere contemplate issuance of a show cause notice prior to finalization of scrutiny assessments, as a matter of procedure and good office, the Assessing Authority is expected to crystalize the issues and issue a show cause notice setting out the issues, solicit the response of the assessee and pass orders only thereafter, after hearing the assessee concerned Facts Assessee company which challenged two assessment orders for AYs 2016-17 and 2017 -18 , passed by the Assistant Commissioner of Income Tax. Though the assessments are assailed on several grounds the core legal issue was whether a show cause notice has to be