

FROM THE OFFICE OF THE ELECTION COMMISSION – FPCCI

Federation House, Tariq Sayeed Complex,
Main Clifton, Block 5, Abdullah Shah Ghazi Road, Karachi
T. 021-35873691-94, E. info@fpcci.org.pk, Website. www.fpcci.org.pk

FPCCI.Election.2024-25/2023-12667
16th December 2023

Through E-mail, Website

URGENT & IMPORTANT

MR. TARIQ MEHMOOD JADOON
Proprietor
M/s. Crockery Link
Gound Floor, Shireen Tower, China Market,
Gordon College Road,
Rawalpindi
M: 03005107948

E: tariqjadoon20@gmail.com

----- APPELLANT

HEARING # SMALL-VP-023 HEARING CALLED BY THE ELECTION COMMISSION OF FPCCI (FPCCI ELECTIONS 2024-2025)

Please refer to the objections, received on 16th December 2023 in FPCCI Head Office Karachi from Mr. Tariq Mehmood Jadoon, to the Election Commission of FPCCI, for not inclusion in the provisional list of candidates.

The Election Commission of FPCCI is pleased to grant the objector and the respondent(s) a **hearing opportunity in person** or through their **authorized representative** (with letter of authorization from the Appellant(s) / Respondent(s)) before the Election Commission of FPCCI alongwith all original / relevant documents, as per following schedule:

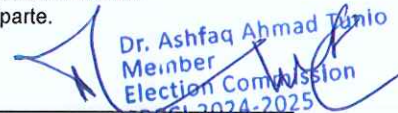
Day & Date: **Monday, 18th December 2023**
Time: **Between 10:30 a.m. to 3:00 p.m.**
Venue: **Basement 2, FPCCI Head Office Karachi**

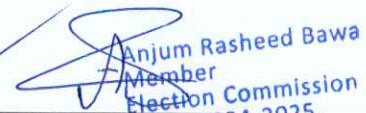
FPCCI has arranged special Zoom link facility for the outstation Objector(s) / Respondent(s). Those who are unable to attend physically may avail the hearing via Zoom Link, by the following link:

Zoom ID: 764 276 3799
Password: fpcci1214
Link: <https://us06web.zoom.us/j/7642763799>

Punctuality of time is requested. Also you are requested to be precise and brief.
In case of non- appearance, the case shall be decided ex-parte.


ARSHAD KHURSHID
Member of the Election Commission


Dr. Ashfaq Ahmad Tunio
Member
Election Commission
FPCCI 2024-2025
ASHFAQ AHMED TUNIO
Member of the Election Commission


Anjum Rasheed Bawa
Member
Election Commission
FPCCI 2024-2025
ANJUM RASHEED BAWA
Member of the Election Commission

Copy to: Regulator, Trade Organizations, Islamabad
Secretary General FPCCI

Small-VP-023



Crockery Link

H-46 First Floor, All Shopping Centre, China Market, College Road, Rawalpindi.
Ph Off: 051-5775464 Fax: 051-5538677

Whole Sale Dealer: All Kinds of Crockery, Crystal & Kitchen Ware

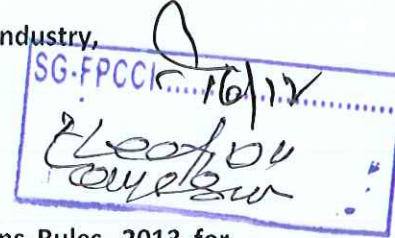


Date: _____

Ref: _____

To,

The Election Commission of Federation of Pakistan Chamber of Commerce and Industry,
Federation House, Tariq Sayeed Complex,
Main Clifton, Karachi,
Pakistan.



Subject;- Representation/request under Rule 18(12) of the Trade Organizations Rules, 2013 for review/reconsideration of decision dated. 14-12-2023 taken by the Election Commission at the time of scrutiny of nomination papers of the undersigned without affording an opportunity for explanation.

Respectfully Sheweth,

1. That the undersigned nomination papers were submitted as a candidature for the seat of Vice President of the FPCCI.
2. The candidature for the post of Vice President of FPCCI for the year 2024-2025 representing the Chambers of Small Traders & Small Industry of the undersigned was proposed and seconded by the eligible voters as per Rule 18 (9) of the Trade Organizations Rules, 2013. The said nomination papers was witnessed by the Secretary General of the Secretary General Rawalpindi Chamber of Small Traders and Small Industry.
3. That the Election Commission of the FPCCI issued provisional voter list dated 14-12-2023, through which the learned Election Commission of the FPCCI rejected the nomination papers of the undersigned by giving reasoning that the Proposer has already proposed Mr. MUHAMMAD SAQIB ABBASI as same position hence rejected. The assumption of the Election Commission of the FPCCI declaring that the Proposer has already proposed Mr. MUHAMMAD SAQIB ABBASI is not sustainable in the eyes of law.
4. The election commission failed to discharge their duties as per 18(11) of the Trade Organizations Rules, 2013 in its letter and spirit. The purpose of scrutiny as provided in the above referred rule is to provide an opportunity to the candidate to complete the formalities/ requirement of the Rules and the law but the Election Commission of the FPCCI through the above referred order nullify the meaningful exercise of scrutiny. Mr. Taj Muhammad has assured to the undersigned that he has neither proposed nor seconded any other candidate for Vice President of FPCCI for the year 2024-2025 representing the Chambers of Small Traders & Small Industry except the undersigned

candidate, Therefore the decision of the Election Commission by rejecting the nomination as candidate for Vice President of FPCCI for the year 2024-2025 representing the Chambers of Small Traders & Small Industry is not sustainable.

5. That the order dated 14-12-2023 passed by the Election Commission of the FPCCI was passed without application of his independent mind and without even realizing that the said order is not only illegal but also against the Article 17 of the Constitution of Pakistan, 1973, hence the Election Commission of the FPCCI failed to discharge his duties as per exigencies of his statutory responsibilities and acted in excess of their statutory responsibilities and acted in violation of his lawful authority and in violation of law and constitutional mandate. Therefore, the conduct of the Election Commission of the FPCCI is violative of the dictates of the Hon'ble Superior Court and needs to judicially reviewed by this Learned Authority.
6. That the order dated 14-12-2023 passed by the Election Commission of the FPCCI is violative of principle of natural justice. The Election Commission exercised the power in manner which is not fair.
7. The it is the primary duty of the election Commission of the FPCCI to maintain a political impartiality amongst the candidates during the election of the FPCCI, but the above said conduct of the Election Commission of FPCCI leaves no doubt in my mind the Election Commission is bias towards the undersigned.

In view of the above it is most respectfully prayed that the by accepting the instant application the order of rejection of the nomination papers of the undersigned may kindly be reversed/ set aside and the nomination for the candidature for Vice President of FPCCI for the year 2024-2025 representing the Chambers of Small Traders & Small Industry of the undersigned may kindly be accepted in the interest of justice.

Applicant



Tariq Mehmood Jadoon,
Candidate for Vice President of the
FPCCI for the year 2024-2025
representing the Chambers of Small
Traders & Small Industry., EC & GB
Rawalpindi Chamber of Small
Traders and Small Industry.

Dated. 16-12-2023

19 MAY 2025

2992

Renewed up to: _____



Licence No. 198

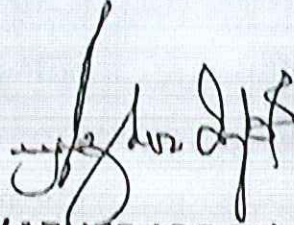
UMAR DAD AFRIDI
Regulator of Trade Organisations
Directorate General of Trade Organisation
Ministry of Commerce, Islamabad

**GOVERNMENT OF PAKISTAN
MINISTRY OF COMMERCE**

Granted under Section 3(2)(f) of the Trade Organisations Act, 2013

In exercise of powers conferred by Section 3 of the Trade Organisations Act, 2013 (Act No II of 2013), the Federal Government is pleased to grant licence to Rawalpindi Chamber of Small Traders and Small Industry as a trade organisation within the meaning of clause (s) & (t) of Section 2 of the said Act. The trade organisation has been granted licence as a Chamber of Small Traders and Small Industry to represent small businesses, small traders and small Industry in Rawalpindi District.

This licence is valid for five years from the date of issue subject to the terms and conditions overleaf.


(AZHER IQBAL)

Regulator of Trade Organisations

Islamabad, the May 20, 2015



Affidavit

I, Taj Muhammad Proprietor M/s Taj & Company, Malakand Road, Near Bypass

Pattak, Mardan EC & GB nominee of Mardan Chamber of Small Traders & Small Industry, having CNIC# 16101-1134368-3, Solemnly affirm and declare as under:-

1. That I have only proposed to the Mr. Tariq Mehmood Jadoon EC & GB (Associate), Rawalpindi Chamber of Small Traders and Small Industry as candidate for Vice President of FPCCI for the year 2024-2025 representing the Chambers of Small Traders & Small Industry.
2. That I have neither proposed nor seconded by any other candidate for seat of Vice President of FPCCI for the year 2024-2025 representing the Chambers of Small Traders & Small Industry.
3. That the above said contents are true and correct to the best of my knowledge and nothing has been concealed therefrom.

Taj Muhammad
 DEPONENT

Verification:-

It is verified on oath on this 16 day of Deahr, 2023 at 10-AM, that the contents of the above affidavit are true and correct to best of my belief and nothing has been concealed therefrom.

Taj Muhammad
 DEPONENT

*Akhter
 16-12-23
 Taj Muhammad*

SECRETARY GENERAL
 MARDAN CHAMBER OF SMALL TRADERS
 AND SMALL INDUSTRY

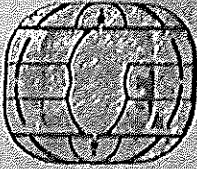




PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Taj Muhammad



Father Name
Mir Muhammad Khan

تاج محمد

میر محمد خان



Gender | Country of Stay
M | Pakistan

Identity Number | Date of Birth
16101-1134368-3 | 23.01.1980

Date of Issue | Date of Expiry
14.06.2019 | 14.06.2029

Holder's Signature

16101-1134368-3

میر محمد تاج محمد خان، مردان

میر محمد خان، مردان

10111359027

Uzma Y. Moini
Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں