FPCCI.EL2027-28/2026/5248
November 24, 2026

THROUGH EMAIL, WEBSITE, WHATSAPP

**DECISION NO. 010 (214)**
**PASSED BY THE SECRETARY GENERAL FPCCI**

**MR. MUSLIM MOHAMEDI**
**NOMINEE ON EC&GB CORPORATE, FROM PAKISTAN FISHERIES EXPORTERS ASSOCIATION**
PARTNER
M/S. M.A. MOHAMEDI AND CO.
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**MR. SHAUKAT ALI OMERSON**
**NOMINEE ON EC&GB CORPORATE, FROM ALL PAKISTAN RESTAURANT ASSOCIATION**
CHIEF EXECUTIVE
M/S. LALQILA PRIVATE LIMITED
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**MR. ADEEL FEROZ KALIA**
**NOMINEE ON GB ASSOCIATE, FROM ALL PAKISTAN RESTAURANT ASSOCIATION**
PARTNER
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**SUBJECT: REPLY TO THE OBJECTION UNDER RULE 18(4) OF THE TRADE ORGANIZATIONS RULES 2013 AGAINST THE INCLUSION OF NOMINATIONS SUBMITTED BY ALL PAKISTAN RESTAURANTS ASSOCIATION AT SERIAL NOS. 06, MR. SHAUKAT ALI OMERSON (EC/GB CORPORATE) AND 07, MR. ADEEL FEROZ KALIA PARTNER (GB CORPORATE) IN THE ADDITIONAL LIST OF NOMINATIONS DATED 23-11-2026, FPCCI ELECTION 2027-28.**

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This is with reference to objections received on 24th November 2026 in FPCCI Head Office Karachi, from Mr. Muslim Mohomedi, nominee on EC&GB (Corporate) from Pakistan Fisheries Exporters Association, on the nominations of Mr. Shaukat Ali Omerson, EC&GB Corporate, and Mr. Adeel Feroz Kalia, GB Associate, from All Pakistan Restaurant Association for FPCCI Elections 2027-2028.

**Objection:**

Objections has been raised regarding the classification of nominations, non-renewal of the License of the Association, business activities of the nominees does not relate to the association and nominees' ineligibility and less than 50 million turnover.

**FPCCI's Findings:**

a) Included under the directives of DGTO, vide Order F. No. 17(31)/2026 dated 16th November 2026.
b) FBR Tax Returns not provided to decide the corporate class and Turnover of the nominees.

**Decision by the Secretary General:**

Keeping in view of above findings it is not possible to classify the category of the nominees, therefore, objection is accepted, therefore, at this stage, the nominations of Pakistan Restaurants Association, are hereby excluded / rejected.

**Brig Iftikhar Opel, SI(M), Retd**
Secretary General

Copy to:

1. The Regulator of Trade Organizations (DGTO), Islamabad
2. The Election Commission, FPCCI

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SG-FPCCI 24/11

FPCCI DATE 24.11.26 R. NO: 010 KARACHI

Date: 24-11-2026,

The Secretary General,
Federation of Pakistan Chamber of Commerce and Industry,
Federation House, Main Clifton Block 5,
Main Abdullah Shah Ghazi Road,

Through; By Hand

***Subject:-*** ***Objection under Rule 18(4) of the Trade Organizations Rules, 2013, against the inclusion of Mr. Adeel Feroz Kalia, Partner M/s Kaybees Cafe and Grill Shop, as Associate Member (GB), and Mr. Shaukat Ali Umar, Chief Executive Officer M/s Lal Qila (Pvt.) Ltd, as Corporate Member (GB), nominated by All Pakistan Restaurants Association, Karachi, in the provisional voter list issued on 23-11-2026, pursuant to DGTO letter dated 05-11-2026.***

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*Dear Sir,*

The undersigned hereby raises the following objections against the inclusion of the above-named nominees of the All Pakistan Restaurants Association, Karachi (hereinafter referred to as the "Association"), in the provisional voter list for the FPCCI Elections 2027–2028, on the grounds that neither of the nominees fulfils the prescribed eligibility criteria for the respective membership class, as their business concerns have failed to establish that they are engaged in the specific trade represented by the Association. Furthermore, the Corporate Class nominee does not fulfil the prescribed annual turnover threshold of Rs.50 million under Rule 2(g) of the Trade Organizations Rules, 2013. The licence of the Association has also not been renewed in accordance with the statutory requirements of the Trade Organizations Act, 2013 and the Trade Organizations Rules, 2013.

**1. Statutory requirements for eligibility to participate in FPCCI elections**

That Article 15 of the Memorandum and Articles of Association of the Federation of Pakistan Chambers of Commerce & Industry (FPCCI) provides that the members of the Electoral College shall be eligible to vote only if they fulfil the conditions prescribed under Section 10 of the Trade Organizations Act, 2013 (hereinafter referred to as the "2013 Act") and the Trade Organizations Rules, 2013 (hereinafter referred to as the "2013 Rules").

That Rule 15(1) of the 2013 Rules, subject to the provisions of Section 10 of the 2013 Act, prescribes the following conditions for eligibility of a member of a trade organization to vote in its elections:

"(a) the member has completed two years of valid membership of the trade organization as on the date of announcement of election schedule by the executive committee of the trade organization;

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Provided that old members shall be eligible to vote on completion of one year of their enrollment and payment of all dues; and

(b) the member has fulfilled the conditions of membership and renewal thereof of the respective trade organization under rule 11."

That the above provisions require that a person seeking representation in the FPCCI Electoral College must possess valid membership of a duly licensed trade organization and must independently fulfil the applicable conditions of membership, renewal and eligibility prescribed under the 2013 Act and the 2013 Rules.

**2. Non-renewal of the licence of the Association in violation of the statutory framework**

That the All Pakistan Restaurants Association, Karachi, is required to maintain its legal status and comply with the mandatory statutory and regulatory requirements governing the licensing, renewal and functioning of trade organizations under the 2013 Act and the 2013 Rules.

However, the licence of the Association has not been renewed in accordance with the requirements of Rule 11 of the 2013 Rules and the applicable provisions of the 2013 Act. The failure to obtain the requisite renewal raises a serious question regarding the Association's subsisting legal entitlement to exercise the privileges and functions of a licensed trade organization.

That the Association cannot claim the privilege of nominating representatives to the FPCCI Electoral College without first establishing that its licence remains valid and subsisting and that it has fulfilled the mandatory statutory requirements relating to renewal and regulatory compliance.

Accordingly, the FPCCI is required to verify from the office of the Director General Trade Organizations whether the licence of the All Pakistan Restaurants Association has been validly renewed and remains in force for the relevant period. In the absence of a valid and subsisting licence, the Association cannot lawfully claim entitlement to forward nominations for participation in the FPCCI elections.

**3. Nominees must carry on business falling within the specific trade for which the Association was licensed**

That, without prejudice to the above objection regarding the licensing and renewal status of the Association, it is submitted that the eligibility of both nominees is independently defective because neither nominee has established that his respective business concern is genuinely engaged in the specific trade for which the Association was granted its licence, namely, the restaurant business and related commercial activities falling within the licensed scope of the Association.

The very object of licensing a trade organization for a specific trade is to ensure that its membership comprises persons genuinely engaged in the trade which the organization is authorized to represent. Consequently, membership of the Association cannot be extended indiscriminately to persons or business concerns carrying on unrelated commercial activities having no nexus with the specific trade for which the Association was established and licensed.

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A person carrying on an unrelated business cannot acquire eligibility merely by obtaining membership of the Association or securing nomination through it. The business activities of both nominees must, therefore, be examined in the context of the specific licensed trade of the Association rather than merely on the basis of their descriptions as partners, proprietors or chief executives of business concerns.

**4. Mr. Adeel Feroz Kalia, Partner M/s Kabees Cafe and Grill Shop, does not fulfil the eligibility criteria for Associate Membership (GB)**

That the All Pakistan Restaurants Association has nominated Mr. Adeel Feroz Kalia, Partner of M/s Kaybees Cafe and Grill Shop, as its representative from the Associate Class for the General Body of the FPCCI.

However, the said nominee has failed to establish that his business concern fulfils the applicable eligibility requirements for Associate Membership of the Association. In particular, no satisfactory documentary evidence has been furnished to establish that M/s Cabeez Cafe and Grill Shop is genuinely engaged in the specific trade represented by the Association and that its business activities fall within the scope of the licence granted to the Association.

The mere description of an individual as a partner of a business concern or the existence of a commercial establishment under a particular name does not automatically establish eligibility for membership of a trade organization. The fundamental requirement is that the business concern must genuinely fall within the specific trade represented by the Association.

Consequently, unless Mr. Adeel Feroz Kalia establishes through verifiable documentary evidence that M/s Cabeez Cafe and Grill Shop is engaged in the specific licensed trade and fulfils the applicable membership requirements, his nomination as Associate Member (GB) cannot be sustained and is liable to be rejected.

**5. Mr. Shaukat Ali Umar, Chief Executive Officer M/s Lal Qila (Pvt.) Ltd., does not fulfil the eligibility criteria for Corporate Membership (GB)**

That the All Pakistan Restaurants Association has also nominated Mr. Shaukat Ali Umar, Chief Executive Officer of M/s Lal Qila (Pvt.) Ltd., as its representative from the Corporate Class for the General Body of the FPCCI.

However, the said nominee does not fulfil the prescribed eligibility criteria for Corporate Membership. In particular, the business concern represented by him does not meet the mandatory annual turnover threshold of Rs.50 million for the preceding financial year, as prescribed under Rule 2(g) of the 2013 Rules.

It is submitted that the mere fact that M/s Lal Qila (Pvt.) Ltd. is incorporated as a private limited company does not automatically confer eligibility upon its representative to claim Corporate Class membership. The designation of an individual as Chief Executive Officer and the incorporation of a company under the Companies Act, 2017, are not sufficient to establish compliance with the prescribed financial threshold under the 2013 Rules.

Furthermore, no satisfactory evidence has been furnished to establish that the business activities of M/s Lal Qila (Pvt.) Ltd. fulfil the specific trade requirements of the All Pakistan

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Restaurants Association and fall within the scope of the trade for which the Association was licensed.

Thus, the nominee suffers from two independent eligibility deficiencies: firstly, failure of the underlying business concern to meet the prescribed annual turnover threshold of Rs.50 million for Corporate Class membership; and secondly, failure to establish that the business activities of the company fall within the specific licensed trade represented by the Association.

The relevant annual income tax returns, audited financial statements and other verifiable financial records are required to establish compliance with the prescribed turnover requirement.

Consequently, the nomination of Mr. Shaukat Ali Umar as Corporate Member (GB) is contrary to the requirements of Rule 2(g) of the 2013 Rules and is liable to be rejected.

**6. Ineligibility of nominees whose underlying membership does not fulfil statutory requirements**

That the Honourable Islamabad High Court, in its judgment reported as **2021 CLD 204, titled Aftab Ahmed Barlas v. Director General Trade Organizations and Others (W.P. No. 4172/2019)**, has recognized the principle that where an individual does not fulfil the legal requirements for membership of a trade organization, such individual cannot claim eligibility to represent that trade organization in the electoral process of the FPCCI.

The principle laid down by the Honourable Islamabad High Court squarely applies to the present matter. The eligibility of the nominees cannot be determined merely on the basis of nomination letters forwarded by the Association or their inclusion in the provisional voter list. Their underlying membership must independently satisfy the statutory requirements, including the requirement that their respective business concerns are genuinely engaged in the specific trade represented by the Association.

Where the underlying membership itself is legally deficient, the consequential nomination to the FPCCI Electoral College cannot be sustained.

**7. Consequences under Article 15 of the FPCCI Memorandum and Articles of Association read with Rules 11 and 15 of the 2013 Rules**

That Article 15 of the Memorandum and Articles of Association of the FPCCI, read with Rule 15(1) and Rule 11 of the 2013 Rules, makes it incumbent upon the FPCCI to ensure that only duly qualified members of legally compliant and duly licensed trade organizations are included in its Electoral College.

The Association, having failed to establish renewal of its licence in accordance with the statutory requirements, cannot claim an automatic right to forward nominees for participation in the FPCCI elections.

Independently, both nominees have failed to establish that their respective business concerns are engaged in the specific trade for which the Association was licensed. Furthermore, the Corporate nominee has failed to establish compliance with the prescribed annual turnover threshold of Rs.50 million under Rule 2(g) of the 2013 Rules.

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Therefore, the nominations suffer from fundamental defects concerning the legal status of the nominating Association and the substantive eligibility of the nominees themselves.

**PRAYER**

In view of the foregoing, it is respectfully requested that:

a. The present objection may kindly be entertained under Rule 18(4) of the Trade Organizations Rules, 2013, against the inclusion of the nominees forwarded by the All Pakistan Restaurants Association, Karachi, in the provisional voter list issued on 23-11-2026.

b. The licensing and renewal status of the All Pakistan Restaurants Association may kindly be verified from the office of the Director General Trade Organizations, particularly whether its licence has been validly renewed and remains subsisting in accordance with the 2013 Act and the 2013 Rules.

c. The nomination of **Mr. Adeel Feroz Kalia, Partner M/s Kaybees Cafe and Grill Shop, as Associate Member (GB)** may kindly be rejected and his name deleted from the provisional voter list on account of his failure to establish that his business concern is engaged in the specific licensed trade represented by the Association and fulfils the applicable membership requirements.

d. The nomination of **Mr. Shaukat Ali Umar, Chief Executive Officer M/s Lal Qila (Pvt.) Ltd., as Corporate Member (GB)** may likewise be rejected and his name deleted from the provisional voter list on account of the failure of the underlying business concern to establish compliance with the prescribed annual turnover threshold of Rs.50 million under Rule 2(g) of the 2013 Rules, as well as its failure to establish eligibility within the specific licensed trade of the Association.

e. The Association may be directed to produce its valid licence and renewal order, membership records and admission forms of both nominees, together with the relevant income tax returns, audited financial statements and other documentary evidence establishing the eligibility of both business concerns under the applicable statutory framework.

f. Unless and until the licensing status of the Association and the individual eligibility of both nominees are established in accordance with law, they may not be permitted to participate in the FPCCI Elections 2027–2028.

The objection is submitted in the interest of transparency, legality and fairness in the electoral process of the FPCCI.

***Regards,***

For M. A. MOHAMEDI & CO.

Muslim S. Mohamedi

**Muslim Mohamedi,**
EC & GB Member of FPCCI 2027-28