JUDGMENT SHEET
ISLAMABAD HIGH COURT, ISLAMABAD
JUDICIAL DEPARTMENT

Writ Petition No.3479 of 2024

Meezan Bank Limited

Versus

Pakistan through Ministry of Finance and others

Petitioner by:	M/s Dr. Farogh Naseem, Rana Imran Farooq, and Sardar Haseeb Iftikhar Ahmed, Advocates.
Respondents by:	Hafiz Ahsaan Ahmed Khokhar, Mr. Ihtesham Manzoor, Advocates and Mr. Azmat Bashir Tarrar, AAG.
Date of Hearing:	**16.06.2026.**

INAAM AMEEN MINHAS, J.- The petitioner bank has filed the instant constitutional petition with the following prayer: -

> *"(i) declare section 4C to the Income Tax Ordinance, 2001, alongwith any demand notices or recovery proceedings or orders including demand of the main tax of advance tax under section 147 of the 2001 Ordinance to be unconstitutional, while striking down the same;*
>
> *(ii) declare that for contracts of finance entered into:-*
>
> *a) prior to 1.7.2022, which have till date not matured/expired or which have matured on or after 31.12.2023, the Petitioner is not liable to pay any super tax u/s 4C of the 2001 Ordinance;*
>
> *b) after 30.6.2022 and prior to 1.7.2023, which have till date not matured/expired or which have matured on or after 31.12.2023, the Petitioner is only liable to pay super tax @ 4%;*
>
> *c) after 30.6.2023 and prior to 1.7.2024, the Petitioner is liable to pay super tax @ 10%;*

Uncertified

(iii) declare that the Petitioner is fully entitled to claim any final discharge of liability under the Final or Presumptive Tax Regime with regard to any of the items mentioned in the Income Tax Ordinance, 2001, including dividends, without any impact of super tax levied u/s 4C of the Income Tax Ordinance, 2001;

(iv) declare that the Petitioner is fully entitled to all brought forward depreciation and brought forward losses under the Income Tax Ordinance, 2001, without any impact of super tax levied u/s 4C of the Income Tax Ordinance, 2001;

v) declare that the Petitioner shall be entitled to claim imputable income as mentioned in section 2(28A) or any other provision of the Income Tax Ordinance, 2001, without any impact of super tax u/s 4C of the Income Tax Ordinance, 2001;

vi) for the purposes of the Fourth, Fifth, Seventh and Eighth Schedules, brought forward depreciation, brought forward amortization and brought forward business losses shall be reckoned, without any impact of super tax u/s 4C of the Income Tax Ordinance, 2001;

vii) permanently and pending disposal of the main petition restrain the Respondents, their officers, agents and cronies from levying, charging, imposing or ordering the Petitioner to pay super tax u/s 4C of the 2001 Ordinance or advance tax u/s 147 of 2001 Ordinance in relation to super tax in the manner that for contracts of finance entered into:-

a) prior to 1.7.2022, which have till date not matured/expired or which have matured on or after 31.12.2023, the Petitioner is not liable to pay any super tax u/s 4C of the 2001 Ordinance;

b) after 30.6.2022 and prior to 1.7.2023, which have till date not matured/expired or which have matured on or after 31.12.2023, the Petitioner is only liable to pay super tax @ 4%;

c) after 30.6.2023 and prior to 1.7.2024, the Petitioner is liable to pay super tax @ 10%."

2. The petitioner is a Public Limited Company engaged in the business of banking. The petitioner in the instant petition has challenged the constitutional validity of Section 4C of the Income Tax Ordinance, 2001 **("ITO 2001")**, and the related provisions introduced through the Finance Act, 2023.

Uncertified

3. The learned counsel for the petitioner argued that the impugned levy of Super Tax is without lawful authority, unconstitutional, discriminatory, retrospective, and violative of Articles 4, 10A, 18, 23, 24, and 25 of the Constitution. It was argued that constitutional sanction for the levy of income tax is traceable to Entry 47 of Part I of the Fourth Schedule read with Articles 70(4) and 142 of the Constitution, while Section 4 is the main charging provision of the ITO, 2001. The learned counsel submitted that once income has been taxed under Section 4, it can no longer be treated as taxable income under Entry 47, therefore, the levy of Super Tax under Section 4C amounts to taxing the same income twice. According to the learned counsel Section 4C does not contain any non obstante clause, deeming provision, or express words stating that it operates in addition to the tax under Section 4. In the absence of clear legislative authority, both provisions cannot be applied to the same income, and any ambiguity in a charging provision must be interpreted in favour of the taxpayer.

4. The learned counsel further argued that Section 4C suffers from serious uncertainty regarding the taxable subject. Referring to Sections 2(29), 2(64), 9, 10, and 11 of the ITO, 2001, he submitted that although the ITO, 2001 defines “taxable income,” “total income,” and different heads of income, it does not clearly define the expression “income” used in Section 4C. According to him, a valid charging provision must clearly identify the person liable to tax, the taxable event, the taxable subject, and the method of calculating the tax. Since Section 4C does not provide an independent mechanism for determining the taxable income, it is vague, uncertain, and incapable of lawful enforcement. He further argued that Section 4C is not self-executing because subsection (6) authorizes the Federal Board of Revenue to frame rules for its implementation. As no such rules had been framed, the statutory mechanism remained incomplete, making the levy unenforceable.

5. The learned counsel further argued that the impugned legislation is arbitrary, unreasonable, and discriminatory. He submitted that the legislature has effectively imposed the same tax twice through different

Uncertified

statutory provisions and names, which amounts to a colourable exercise of power and a fraud upon the Constitution. According to him, the combined burden of normal income tax, Super Tax, and other taxes is excessive, confiscatory, and disproportionate, seriously affecting the petitioner's ability to carry on its business. He contended that such excessive taxation violates the constitutional guarantees of freedom of trade and business, protection of property, equality before law, and due process under Articles 18, 23, 24, 25, and 10A of the Constitution. Learned counsel further submitted that Article 25 prohibits not only arbitrary classification but also legislation that is unreasonable, disproportionate, or irrational. He argued that Section 4C, because of its retrospective operation, imposition of unexpected liabilities, and lack of any rational connection with its stated objective, is violative of Article 25 of the Constitution.

6. The learned counsel for the petitioner further argued that the judgment of the Honourable Federal Constitutional Court in M/s DG Khan Cement's case reported as 2026 PTD 625 is distinguishable on facts and does not apply to the present case. He submitted that the said judgment mainly concerned conventional banking companies and other taxpayers, whereas the present petition relates to Islamic banking institutions operating through Shariah-compliant financing modes, including Murabaha, Ijarah, Diminishing Musharakah, and other Islamic financing arrangements. According to him, the special nature of Islamic banking transactions, their accounting treatment under the regulatory framework, and the income arising from such transactions were neither directly in issue nor specifically decided in the said judgment. Therefore, he contended that the principles laid down in the judgment *Supra* do not conclusively decide the present dispute, and the applicability of Section 4C to income derived from Islamic banking transactions requires independent examination by this Court.

7. The learned counsel also strongly challenged the retrospective application of Section 4C and the increase in the Super Tax rates. He submitted that the petitioner had conducted its business, made

Uncertified

investments, incurred expenses, declared dividends, arranged financing facilities, and taken commercial decisions according to the fiscal law existing during the relevant accounting period. He pointed out that the accounting year for Tax Year 2024 had already ended on 31.12.2023, before the impugned legislation came into force. According to him, the rights and liabilities arising from completed transactions had already become final under the law then in force and could not be changed through retrospective tax legislation. He argued that the tax liability arises when the taxable event occurs, not when the tax return is filed. Therefore, a later law cannot impose an additional tax burden on past and completed transactions. He further contended that the retrospective increase of Super Tax from 4% to 10% creates an unexpected and unreasonable financial burden and violates the principles of legal certainty, vested rights, and legitimate expectation protected under Articles 4 and 10A of the Constitution.

8. The learned counsel also relied upon earlier judgments of this Court and other High Courts regarding the levy of Super Tax. He submitted that these judgments had clarified that the words “in addition to” cannot be read into the charging provisions of Section 4C, and that the provision cannot be interpreted as imposing an additional tax over and above the normal income tax without clear legislative language. According to him, any attempt to enforce Section 4C as an additional levy, despite these judicial pronouncements, amounts to ignoring binding precedents and violates the constitutional guarantee of due process. He further argued that even the remaining part of Section 4C, after judicial scrutiny, is constitutionally defective, lacks proportionality, and should either be declared unconstitutional or read down to make it consistent with the Constitution.

9. The learned counsel further argued that Sections 4B and 4C of the ITO, 2001, both impose the same levy, namely Super Tax, on the same taxable subject, i.e., income. According to him, Section 4B already provides a complete charging mechanism for Super Tax, and once the legislature had imposed the levy through that provision, it could not

Uncertified

introduce another charging provision under Section 4C for the same taxable income. He submitted that the purpose, operation, and effect of Sections 4B and 4C are substantially the same, and their simultaneous application results in impermissible double taxation. He further contended that the constitutional principles of fairness, non-arbitrariness, and proportionality do not allow the State to impose two substantially similar taxes through separate charging provisions merely by changing their name or legislative form.

10. On the point of the challenge to the exclusion of brought forward depreciation and business losses from the computation mechanism under Section 4C(2)(ii) of the ITO, 2001. The learned counsel argued that depreciation allowances and carried-forward business losses are vested statutory rights that accrued to the taxpayer under the law existing when those losses were incurred and, therefore, cannot be taken away or reduced through retrospective legislation. According to him, neither brought forward depreciation nor business losses can legally be treated as "income." Their exclusion from the computation mechanism artificially increases the taxable income and results in taxation of fictional rather than real income. He submitted that this is contrary to Entry 47 of the Fourth Schedule and violates Articles 10A, 18, 23, and 24 of the Constitution. He further argued that, since Section 4C(2)(ii) does not contain any overriding clause, it cannot override other provisions of the Ordinance that expressly allow adjustment of depreciation and business losses.

11. Moreover, on the point of challenge to the validity of the machinery provisions introduced to implement Section 4C, the learned counsel argued that Sections 4C(5A), 147(4AA), 147(7), and the related provisions regarding advance tax and recovery create a separate system for the collection and recovery of Super Tax without providing taxpayers the procedural safeguards available under the ITO, 2001. According to him, these provisions bypass the established legal procedure, including the requirements of notice, opportunity of hearing, and recovery mechanisms provided in Part IV of the ITO, 2001. He submitted that if

Uncertified

the main levy under Section 4C is unconstitutional, the related recovery provisions cannot survive. He further contended that, even otherwise, the creation of a separate recovery mechanism is contrary to the principles of natural justice and the right to a fair trial and due process guaranteed under Article 10A of the Constitution.

12. The learned counsel further argued that no Super Tax can lawfully be imposed on income that has already been subjected to a final tax liability under the Final Tax Regime prescribed by the ITO, 2001. According to him, once a particular source of income has been finally taxed under a complete and self-contained taxation regime, the legislature cannot later treat the same income as taxable again under Section 4C. He submitted that such a course would defeat the certainty and finality of the Final Tax Regime and would amount to retrospectively reopening tax liabilities that had already been settled.

13. Referring to the financing arrangements and contractual commitments entered into by the petitioner, the learned counsel argued that many contracts had been executed before the introduction of Section 4C and continued thereafter. He submitted that the rights and obligations under those contracts had already become final under the fiscal law in force at the time of their execution. According to him, the subsequent levy of Super Tax on income arising from those contracts imposes an unexpected financial burden and violates Articles 10A, 18, 23, and 24 of the Constitution. He further contended that tax rights crystallize during the relevant accounting period and cannot be changed retrospectively. Therefore, contracts entered into before 01.07.2022 should remain outside the scope of Section 4C, while contracts executed after that date should be governed only by the tax rates and liabilities existing when the relevant rights accrued. In support of his arguments, he also relied upon earlier judgments of this Court granting relief in similar cases involving contracts and transactions extending over multiple tax years.

14. In summary, the learned counsel submitted that Section 4C is a new charging provision introduced through the Finance Act, 2023 in

Uncertified

violation of settled constitutional and fiscal principles. He argued that while a Finance Act may prescribe tax rates, it cannot create a new tax charge with retrospective effect so as to burden completed transactions and vested rights. According to him, the impugned levy is arbitrary, confiscatory, disproportionate, discriminatory, violative of due process, destructive of legitimate expectations, inconsistent with established principles of fiscal law, and beyond the constitutional competence of the legislature. He, therefore, prayed that Section 4C of the Income Tax Ordinance, 2001, the related rate provisions in the First Schedule, and the connected provisions relating to advance tax, withholding, and recovery be declared unconstitutional, *ultra vires*, and without lawful authority, and that all proceedings initiated thereunder be set aside. In support of his submissions, the learned counsel relied upon the M/s DG Khan Cement Case (C.A. No. 1243/2020) judgment of the Honourable Federal Constitutional Court), 1983 CLC 1585, 1993 SCMR 1905, 2005 PTD 259, 2011 PTD 2229, PLD 2016 SC 398, 2022 SCMR 1583, PLD 2024 SC 1168, PLD 2025 SC 67, and other judgments of the superior Courts of Pakistan.

15. The learned counsels for the respondents strongly opposed the instant petition and argued that the challenge to Section 4C of the ITO, 2001 is misconceived, legally untenable, and contrary to the settled principles of fiscal law. At the outset, they raised preliminary objection regarding the maintainability of the petition and submitted that the petitioner had bypassed the complete and effective statutory remedy provided under the Ordinance. They argued that all issues relating to assessment, computation of income, tax rates, interpretation of the law, and even constitutional objections can be raised before the statutory forums, including the Commissioner Inland Revenue, Commissioner Appeals, Appellate Tribunal Inland Revenue, and thereafter before the constitutional Courts in their statutory jurisdiction. According to them, the constitutional jurisdiction under Article 199 is discretionary and should not ordinarily be exercised where an adequate alternative remedy exists, particularly in tax matters involving disputed questions of law and

Uncertified

facts. In support of these submissions, they relied upon 2025 SCMR 952, 2011 PTD 1558, 2024 SCMR 1168, 2024 PTD 221, and 2026 SCMR 339.

16. The learned counsels further argued that the petition is not maintainable for want of territorial jurisdiction. He submitted that the petitioner bank is assessed, regulated, and administered by the Large Taxpayers Office (LTO), Karachi, and that all assessment, compliance, appeal, and other tax proceedings relating to the petitioner have always been conducted in Karachi. He pointed out that the impugned show cause notice and the subsequent proceedings were also initiated and finalized by the competent Inland Revenue authorities at Karachi, and the petitioner has already challenged those proceedings by filing a statutory appeal before the Appellate Tribunal Inland Revenue. Therefore, according to them, no material or substantial part of the cause of action arose within the territorial jurisdiction of this High Court, and the present petition amounts to impermissible forum shopping.

17. On merits, the learned counsels submitted that the petitioner's challenge is based on a misunderstanding of the nature of Super Tax under Section 4C. They argued that Section 4C does not impose tax on past transactions, rather, under the ITO, 2001, the taxable event is the accrual, derivation, or recognition of income during the relevant tax year, and not the execution of a contract, investment, financing arrangement, or banking transaction. Referring to Sections 32, 34, and 74 of the ITO, 2001, they submitted that income tax is charged annually on income accrued, arisen, or received during a tax year. Therefore, the date on which a Murabaha, Ijarah, Diminishing Musharakah, investment, or financing arrangement was executed is irrelevant for determining liability under Section 4C. According to them, the only relevant consideration is whether the income accrued, arose, or was derived during the tax year in which the levy was in force.

18. The learned counsels further submitted that banking companies are a separate class of taxpayers governed by the special taxation regime

Uncertified

contained in the Seventh Schedule read with Section 100A of the ITO, 2001. They argued that, keeping in view the unique nature of banking business, the legislature specifically provided in Division IIB of Part I of the First Schedule for the levy of Super Tax on banking companies whose income exceeds the prescribed statutory limit. According to them, this statutory scheme clearly shows that Super Tax is imposed on income earned, accrued, and recognized during the relevant tax year, and not on the historical transactions from which such income may arise. They therefore contended that the petitioner's attempt to link tax liability with the date of execution of Islamic financing contracts is contrary to the express provisions of the Ordinance and inconsistent with the special tax regime applicable to banking companies.

19. The learned counsels for the respondents also opposed the petitioner's argument that the judgment of the Honourable Federal Constitutional Court in M/s DG Khan Cement Case reported as 2026 PTD 625 does not apply to Islamic banking institutions. They submitted that the distinction between conventional and Islamic banking is misconceived and is not supported by either the ITO, 2001, or the said judgment. According to them, the Federal Constitutional Court specifically examined the applicability of Section 4C to banking companies governed by the Seventh Schedule and held that Super Tax is payable on income accrued and recognized during the relevant tax year. They argued that the judgment is based on the nature and timing of income recognition, not on the mode of financing or the type of banking transaction. They further submitted that the Seventh Schedule applies to both conventional and Islamic banks, and Rule 3 expressly provides that the accounting treatment of Islamic financing transactions does not affect the computation of income or tax liability under the Ordinance. Therefore, the absence of a specific discussion on individual Islamic financing modes does not lessen the binding effect of judgment reported as 2026 PTD 625, which, according to them, fully governs the present case.

Uncertified

20. Responding to the petitioner's reliance on the doctrines of vested rights, past and closed transactions, and legitimate expectation, the learned counsels submitted that these principles do not apply to annual taxation laws, where tax liability is determined on the basis of income accrued during the relevant tax year. They argued that no taxpayer has a vested right to remain subject to a particular tax rate forever or to be exempt from future tax laws enacted by the Parliament. According to them, the doctrine of past and closed transactions has already been explained by the recent judgment of the Honourable Federal Constitutional Court relating to Super Tax, which held that tax liability arises on income recognized during the relevant tax year. They further submitted that once a banking company recognizes income in its accounts during a tax year in which Section 4C is in force, the resulting tax liability cannot be avoided merely because the underlying transaction originated in an earlier period.

21. The learned counsels then responded to the petitioner's argument that Section 4C results in double taxation by imposing a second tax on the same income. They submitted that the Constitution does not prohibit double taxation unless there is an express constitutional restriction. In any case, they argued that Sections 4 and 4C operate in different legislative fields and impose separate tax liabilities. According to them, Section 4 is the main charging provision for normal income tax, whereas Section 4C imposes Super Tax as an additional levy on specified classes of taxpayers whose income exceeds the prescribed threshold. They further submitted that the legislature has full authority to impose multiple taxes on the same taxable subject, provided its intention is clearly expressed. Therefore, the mere fact that both taxes are calculated on income does not make either levy unconstitutional or invalid, and the petitioner's claim of prohibited double taxation is without legal basis.

22. With regard to the alleged ambiguity in the expression "income," the learned counsels submitted that Section 4C must be read together with the ITO, 2001, as a whole and not in isolation. They argued that the Ordinance provides a complete framework for determining income,

Uncertified

taxable income, total income, and the different heads of income. According to them, Section 4C itself lays down the method for calculating income for different categories of taxpayers. In the case of banking companies, Section 4C(2)(iv) specifically provides that income shall be the income declared or computed under the Seventh Schedule, subject to the prescribed adjustments. They submitted that, since the statute clearly provides the method of computation and links it with the Seventh Schedule, there is no uncertainty or ambiguity in the provision. Therefore, the petitioner's challenge on the ground of vagueness is without merit.

23. Refuting the challenge regarding brought forward losses, amortization, and depreciation, the learned counsels submitted that the Parliament has full authority to determine the basis for calculating a particular tax. They argued that Section 4C expressly excludes certain deductions and allowances while computing income for the purpose of Super Tax, and that this exclusion reflects a deliberate legislative policy rather than the confiscation of any vested right. According to them, the right to claim losses, depreciation, or amortization is purely a statutory benefit and is always subject to the conditions and limitations imposed by the legislature, therefore, the petitioner cannot treat a statutory concession as a constitutional right. They submitted that the exclusion of brought forward losses and depreciation from the computation of Super Tax does not violate Entry 47 of the Fourth Schedule or any provision of the Constitution.

24. The learned counsels further submitted that the petitioner's reliance on the judgments in the Fauji Fertilizer, Fauji Foundation, and other similar cases is misplaced and distinguishable. They argued that those cases were decided on different facts and under different statutory provisions and did not involve the taxation of income of banking companies governed by the special regime under the Seventh Schedule of the ITO, 2001. They further submitted that the law has since been clarified by later authoritative judgments of the superior Courts regarding the scope and operation of Super Tax. According to them, the

Uncertified

petitioner has relied on isolated observations from those earlier judgments while ignoring the subsequent binding jurisprudence that governs the present issue.

25. The learned counsels also argued that the petitioner has taken inconsistent positions. They submitted that the petitioner has always maintained its accounts on an accrual basis in accordance with the ITO, 2001, the prudential regulations, accounting standards, and the Seventh Schedule. For the purpose of normal income tax, the petitioner has consistently accepted that income becomes taxable in the year it accrues, regardless of when the underlying transaction was executed. However, for the purpose of Super Tax under Section 4C, the petitioner seeks to abandon this consistent accounting practice and instead link tax liability to the date on which the contracts were originally executed. According to learned counsels, this selective and self-serving interpretation is contrary to the law, established accounting principles, and cannot be accepted by a Court of law.

26. The learned counsels for the respondents also rejected the petitioner's argument that Section 4C is arbitrary, confiscatory, or violative of Articles 18, 23, 24, and 25 of the Constitution. They submitted that fiscal laws enjoy a strong presumption of constitutionality, and Courts generally defer to the legislature in matters of taxation and economic policy. They argued that the burden lies on the petitioner to prove a clear constitutional violation. According to them, Section 4C applies equally to all taxpayers falling within the prescribed statutory class and is based on a reasonable classification, namely taxpayers earning income above the prescribed threshold. This classification has a rational connection with the legislative objective of generating additional revenue from persons with greater financial capacity. Therefore, they contended that the challenge under Articles 18, 23, 24, and 25 is without merit.

27. In response to the petitioner's challenge to the provisions relating to advance tax, withholding, and recovery, the learned counsels

Uncertified

submitted that these are only ancillary provisions meant to implement the principal levy. They argued that the Parliament has full authority not only to impose taxes but also to enact effective provisions for their assessment, collection, and recovery. According to them, Sections 147(4AA), 147(7), 4C(5A), and the related provisions do not create a separate tax liability but merely facilitate the implementation of Section 4C. Therefore, since the principal levy is constitutionally valid, the challenge to these ancillary machinery provisions is also without merit.

28. In conclusion, the learned counsels for the respondents submitted that Section 4C is a valid exercise of the Parliament's legislative power and has been enacted within its constitutional competence to apply prospectively to income accrued during the relevant tax years. They argued that the petitioner has wrongly equated the accrual of income with the historical execution of contracts, contrary to the express provisions of the ITO, 2001, settled accounting principles, and binding judicial precedents. They, therefore, prayed that the petition be dismissed as not maintainable and, in any event, rejected on merits, with a declaration that Section 4C and the related Super Tax provisions are constitutional, legally enforceable, and fully applicable to the income accrued and recognized by the petitioner during the relevant tax years in accordance with Rules 1 and 3 of the Seventh Schedule of the ITO, 2001, which specifically govern the computation of the profits and gains of banking companies and the tax payable thereon.

29. We have heard the learned counsel for the parties at considerable length, carefully examined the pleadings, perused the material available on record and considered the statutory framework as well as the precedents cited at the bar.

30. Before examining the merits of the case, this Court considers it necessary to first decide the preliminary objection relating to its territorial and constitutional jurisdiction. The issue of jurisdiction is of fundamental importance because it goes to the very root of the Court's authority to hear and decide a matter. It is a settled principle of law that

Uncertified

jurisdiction is a creation of statute and power can only be exercised within the limits prescribed by law. Unless a Court has jurisdiction over the subject matter, the parties, and the cause of action, it cannot lawfully determine the parties' rights. Therefore, the question of jurisdiction must always be decided at the very outset before entering into the merits of the dispute. Any adjudication on merits by a Court lacking jurisdiction would be without lawful authority, and every order or judgment passed in such proceedings would be void and without legal effect. For this reason, this Court deems it appropriate to first examine whether it possesses the necessary jurisdiction to entertain the present petition before considering the issues raised on the merits. In the case ***Jameel Qadir and another vs. Government of Balochistan, Local Government, Rural Development and Agravillas Department, Quetta and others***, **(2023 SCMR 1919)**, the Hon'ble Supreme Court held that:-

> *"The term 'jurisdiction' in legal parlance means the command conferred to the Courts by law and Constitution to adjudicate matters between the parties. The jurisdiction of every Court is delineated and established to adhere to and pass legal orders. Transgressing or overriding the boundary of its jurisdiction and authority annuls and invalidates the judgments and orders. In order to deal with the different species of litigation, some Courts and Tribunals are vested with exclusive jurisdiction for taking cognizance of matters which other Courts cannot take under the rigidity or stringency of exclusive jurisdiction to deal with and decide the lis. No Court has the right to decide any lawsuit which is beyond the purview of its jurisdiction and want of jurisdiction conveys an action beyond the domain earmarked to any particular Court or Tribunal which cannot be cured, even by consent or acquiescence of parties. It is the prime duty of the Court to decide the question of jurisdiction first in case of doubts raised regarding its jurisdiction, and in any such situation it is the responsibility of the Court to endeavor to resolve the issue of jurisdiction at an early stage of the proceedings."*

31. The perusal of the order dated 18.12.2024 reveals that notice was issued to the petitioner by the Additional Commissioners of Inland

Uncertified

Revenue, Rang-A, Zone-IV, LTO, Karachi. For the sake of reference, the operative part of the order *Supra* is reproduced as under:-

> *"2. Learned counsel for the petitioner submits that, between the admission order dated 20.11.2024 and today, the Commissioner has initiated proceedings under section 4C of the Income Tax Ordinance, and refers in this regard to para 7 of the notice dated 11.12.2024 issued by the Additional Commissioner of Inland Revenue, Range-A, Zone-IV, LTO, Karachi, para 7 whereof reads as follows:*
>
> *"Your income is also chargeable to super tax under the provisions of section 4C of the Ordinance. The super tax will be recomputed based on amended income under section 122(5A) of the Ordinance. This notice should be treated as notice under section 4C(4)/(5) read with section 122(5A) of the Ordinance."*

32. The first preliminary objection raised by the learned counsels for the respondents relates to the territorial jurisdiction of this Court. It was contended that the petitioner is admittedly assessed, regulated, and administered by the Large Taxpayers Office (LTO), Karachi. It was further submitted that the petitioner's registered office is situated in Karachi, and all its tax returns, statements, assessments, appeals, and other proceedings under the ITO, 2001 have consistently been filed, processed, and decided before the competent tax authorities at Karachi. According to the learned counsels for the respondents, the impugned show-cause notice was issued by the Additional Commissioner Inland Revenue, LTO Karachi, and the consequential order was also passed by the same authority in Karachi. It was further pointed out that the petitioner has already invoked the statutory remedy of appeal before the Appellate Tribunal Inland Revenue at Karachi against the impugned order, thereby acknowledging the jurisdiction of the authorities situated there. On the basis of these admitted facts, the learned counsels for the respondents argued that no integral, substantial, or material part of the cause of action has arisen within the territorial limits of Islamabad as such this Court lacks territorial jurisdiction to entertain and adjudicate upon the present constitutional petition.

Uncertified

33. This Court has given its anxious and thoughtful consideration to the preliminary objection raised by the learned counsel for the respondents regarding territorial jurisdiction. It is a settled principle of constitutional law that the jurisdiction of a High Court under Article 199 of the Constitution is confined to those cases in which the cause of action, either wholly or in part, arises within its territorial limits. The expression "cause of action" has a well-recognized legal meaning and refers to every material, essential, and integral fact which a petitioner is required to establish in order to succeed in obtaining the relief claimed. Therefore, the existence of territorial jurisdiction must be determined by examining where the material facts giving rise to the dispute actually occurred, and not by reference to incidental or remote circumstances. It is equally well settled that the mere presence of a Federal Government office or a Federal authority at Islamabad, or the fact that a statute was enacted by the Parliament or a notification was issued by the Federal Government from Islamabad, does not, by itself, confer territorial jurisdiction upon this Court. Unless the operative and substantial facts constituting the petitioner's grievance have arisen within the territorial limits of Islamabad, this Court cannot assume jurisdiction merely because the legislation or executive action originates from the Federal Government. The true test is whether an integral and material part of the cause of action has arisen within the territorial jurisdiction of this Court. The principle of dominant object and the doctrine of localized jurisdiction, as expounded by the Hon'ble Supreme Court in ***Taufiq Asif and others vs. General (R) Pervez Musharraf and others***, **(PLD 2024 SC 610)** is as under:-

> *"11. However, the Lahore High Court, in purported exercise of its writ jurisdiction under Article 199 of the Constitution, set aside the entire proceedings of the trial, which was conducted by the Special Court against the respondent at Islamabad. The impugned judgment was passed after the final judgment convicting the respondent had been announced by the Special Court. Serious issues have been raised before us about the jurisdiction exercised by the High Court and the grounds for exercising such jurisdiction.*

Uncertified

Territorial jurisdiction of the Lahore High Court.

12. The primary contention of the learned counsel for the petitioners and the teamed AAG is that the Lahore High Court lacked territorial jurisdiction to entertain the writ petition of the respondent filed against the acts done and proceedings taken by the Special Court at Islamabad. This contention, we find, is well-founded. Any act done or proceeding taken by the Special Court at Islamabad could only be challenged, as per Article 199(1)(a)(i), before the High Court within whose territorial jurisdiction such act was done or proceeding taken, that is, the Islamabad High Court. Because of this legal position, the persons. Including the respondent's counsel Barrister Salman Safdar, who were aggrieved of some acts and proceedings of the Special Court had challenged the same in the Islamabad High Court. But the respondent, instead of agitating his grievance in the Islamabad High Court against the act done and proceeding taken by the Special Court at Islamabad, chose the forum of the Lahore High Court, and the latter court, wrongly entertained the same.

13. The Lahore High Court assumed territorial jurisdiction in the matter, stating the reason that since the respondent also challenged, along with the acts and proceedings of the Special Court, the Federal Government's acts, i.e, the acts of filing the complaint and constituting the Special Court, it had the jurisdiction to adjudicate upon the matter. The reason is flawed and is also against the law declared by this Court in Sandalbar and Amin Textile as well as by the Lahore High Court in Sethi and Sethi. The ratio of these cases is that it is the dominant object of the petition, i.e., the main grievance agitated and the ultimate relief sought in the petition, which determines the territorial jurisdiction of the High Courts. If the ultimate relief sought relates to an act done or proceedings taken within the territorial jurisdiction of a particular High Court, no other High Court in the country can assume and exercise writ jurisdiction on the pretext that one of the reliefs sought relates to an act of a federal body."

34. It is a well-settled principle of law that the territorial jurisdiction of a High Court under Article 199 of the Constitution is determined not by the location of the head office or headquarters of a public authority, but by the place where the cause of action has actually arisen and where the impugned acts, proceedings, or orders have been undertaken. Where statutory powers are exercised by an authority or functionary within a

Uncertified

particular territorial jurisdiction, the legality of such actions is ordinarily to be examined by the High Court having territorial jurisdiction over that area. While determining the question of jurisdiction, the Court is required to apply the doctrine of the dominant object and ascertain the real nature of the dispute, the substance of the grievance, and the principal relief sought by the petitioner. If the grievance primarily arises from actions, proceedings, or orders passed within a particular territorial jurisdiction, that jurisdiction cannot be displaced merely because the parent department, ministry, or head office of the authority is situated elsewhere. The Court must focus on the real and substantial cause of action giving rise to the litigation rather than on incidental, remote, or ancillary facts, which have no direct connection with the dispute. Only where an integral and material part of the cause of action has arisen within the territorial limits of a High Court can that Court validly assume jurisdiction under Article 199 of the Constitution. The principle of dominant object and the doctrine of localized jurisdiction has further been discussed in ***Messrs the Communicators (Pvt) Ltd. vs. PEMRA***, **(W.P. No. 2172 of 2025**) as under:-

> *"6. It is a well-established principle of law that a High Court's territorial jurisdiction under Article 199 of the Constitution is invoked only where the cause of action arises within its territorial domain or where the public functionary whose action is being challenged performs functions in relation to the territory of that Court. In the present case, although PEMRA's headquarters are located in Islamabad, the actual impugned action was carried out by its regional officer in Abbottabad, pursuant to powers delegated and exercised within the province of KPK.*
>
> *7. The doctrine of localized jurisdiction applies squarely in this case. Once a functionary of a federal institution exercises power within a specified territorial limit, as in the instant case it was done by respondent No.2 in Abbottabad, the High Court corresponding to that territory alone retains jurisdiction to adjudicate on the legality of such acts.*
>
> *8. The principle of dominant object, as consistently laid down by the superior courts, including the Islamabad High Court in Messrs AIR Ciro v. Government of*

Uncertified

Pakistan (2018 YLR 164), mandates that in order to determine the territorial jurisdiction of a High Court under Article 199 of the Constitution, the Court must identify the true and primary grievance raised in the petition. The dominant relief sought herein pertains to the annulment of the authorization letter dated 27.03.2025 and subsequent seizure proceedings undertaken by respondent No.2 in Abbottabad. All operative acts, including the issuance of the authorization, police requisition, judicial warrant, and execution of seizure, originated and culminated within the territorial jurisdiction of the province of Khyber Pakhtunkhwa. Mere location of PEMRA's head office in Islamabad or the administrative issuance of the authority letter does not, in law, shift the jurisdiction of the High Court to Islamabad. The situs of the cause of action and not the situs of the public functionary's head office is determinative. Thus, the dominant object of the instant petition, being the challenge to field-level executive actions taken in Abbottabad, does not fall within the territorial purview of this Court. Accordingly, since no part of the cause of action arose within Islamabad and all material actions were confined to the province of KPK, this Court lacks the territorial jurisdiction to entertain the instant petition."

35. In the present case, the record clearly shows that the petitioner is assessed and administered by the Large Taxpayers Office (LTO), Karachi. The impugned proceedings were initiated, conducted, and concluded by the competent Inland Revenue authorities functioning at Karachi. The petitioner's tax records are maintained at Karachi, and the impugned order was also passed by an authority exercising lawful jurisdiction within Karachi. It is an admitted position that the petitioner has already challenged the impugned order by filing a statutory appeal before the Appellate Tribunal Inland Revenue, Karachi. These undisputed facts establish that every material and substantial event giving rise to the present dispute has taken place within the territorial jurisdiction of Karachi. The petitioner has not been able to point out any material fact or demonstrate that any legally enforceable right was violated within the territorial limits of Islamabad, thereby conferring jurisdiction upon this Court. The grievance raised in the present petition does not arise merely from the existence of a federal statute; rather, it

Uncertified

arises from the implementation and enforcement of that statute through proceedings conducted by the tax authorities at Karachi. Thus, the assessment, adjudication, enforcement, and appellate proceedings are all connected with Karachi, where the entire cause of action has arisen. The territorial jurisdiction of this Court cannot be invoked merely because the Federation of Pakistan has been impleaded as a respondent or because the impugned provisions form part of a federal law enacted by the Parliament. Such circumstances, by themselves, do not create any part of the cause of action within Islamabad. This Court is also persuaded that the petitioner has consistently accepted and invoked the jurisdiction of the tax authorities and appellate forums in Karachi in all matters relating to its assessments and tax liabilities. Having voluntarily subjected itself to that jurisdiction throughout the proceedings, the petitioner cannot now seek to invoke the constitutional jurisdiction of another High Court in relation to the same tax dispute. Permitting such a course would amount to forum shopping, which has consistently been discouraged by the superior Courts, as it undermines the orderly administration of justice and the settled principles governing territorial jurisdiction.

36. Even if, for the sake of argument, the petitioner's submission is accepted that the principal issue before this Court is the interpretation of Section 4C of the Income Tax Ordinance, 2001, in relation to Islamic finance contracts, such contention does not materially advance its case. The reason is that the scope, application, and legal effect of Section 4C have already been conclusively examined and authoritatively settled by the superior Courts, including the judgment in *M/s DG Khan Cement Case reported* as **2026 PTD 625**. The foundation of the petitioner’s case is that the applicability of Super Tax under Section 4C should be determined with reference to the date on which the underlying Islamic finance contracts, financing arrangements, investments, or banking transactions were originally executed. According to the petitioner, if such contracts were entered into before the insertion of Section 4C, or before any subsequent enhancement in the rate of Super Tax, then the

Uncertified

income arising from those contracts in later years cannot be subjected to the levy imposed by Section 4C. This argument is based upon the concepts of vested rights, legitimate expectation, past and closed transactions, and the alleged retrospective operation of the impugned provision. Although this submission appears attractive at first sight, it does not withstand legal scrutiny when examined in the light of the scheme and structure of the ITO, 2001. The entire argument proceeds on the incorrect assumption that the execution of a financing agreement constitutes the taxable event. Neither the language of the Ordinance nor the settled principles of income tax law support such an interpretation. Under the constitutional and statutory framework governing fiscal legislation in Pakistan, income tax is not imposed on contracts, investments, financing arrangements, or commercial transactions merely because they have been executed. The subject of taxation is the income that accrues, arises, is derived, or is received during a particular tax year. The date on which the source of that income came into existence is entirely different from the event that gives rise to tax liability. The ITO, 2001 adopts the principle of annual taxation, whereby tax liability is determined separately for each tax year on the basis of income earned during that year, irrespective of when the underlying transaction or contract was originally entered into. Sections 32 and 34 of the Ordinance recognize the accrual basis of accounting and require taxable income to be computed in accordance with recognized accounting principles. Consequently, what attracts tax is the income recognized during the relevant tax year and not the historical origin of the transaction from which that income eventually flows. This distinction becomes even more significant in the case of banking companies, which are governed by the special taxation regime set out in Section 100A, read with the Seventh Schedule to the Ordinance. Rule 1 of the Seventh Schedule prescribes a separate mechanism for determining the taxable income, profits, and gains of banking companies by reference to their annual accounts prepared in accordance with the regulatory requirements of the State Bank of Pakistan, subject only to the adjustments expressly permitted under the Ordinance. Accordingly, income generated through Islamic

Uncertified

modes of financing, including Murabaha, Ijarah, Diminishing Musharakah, Musharakah, Modaraba, and other Shariah-compliant financing arrangements, does not become taxable merely because the underlying contracts were executed. Such contracts generally create continuing rights and obligations extending over several accounting periods and generate income gradually over time. The taxable event occurs only when such income accrues and is recognized in the books of account during the relevant tax year in accordance with the applicable accounting standards and the provisions of the ITO, 2001. It is this accrued and recognized income that forms part of the annual taxable income of a banking company and becomes liable to tax, including Super Tax under Section 4C, where the statutory conditions are fulfilled.

37. The Legislature has consciously enacted a special mechanism under the Seventh Schedule to govern the taxation of income arising from Islamic financing transactions. The language of the Ordinance clearly shows that the Legislature intended this mechanism to operate independently and uniformly for all qualifying transactions. There is nothing in the Ordinance to indicate that the taxability of such income depends upon the date on which the underlying Islamic finance agreement was originally executed. Had the Legislature intended to make the applicability of the tax provisions dependent upon the execution date of the contract, it would have expressly provided so in the law. In the absence of any such restriction, no limitation or condition can be read into the statute by implication. Therefore, the taxability of the income must be determined strictly in accordance with the provisions of the Seventh Schedule and not on the basis of the date of execution of the underlying Islamic finance contract. Accepting the petitioner's interpretation would defeat the annual scheme of taxation under the ITO, 2001, by making tax liability depend upon the date of the underlying contract rather than the income earned during the relevant tax year. Such an approach is neither supported by the language nor the scheme of the Ordinance and would create unjustified discrimination between taxpayers earning the same income in the same tax year. Section 4C(2)

Uncertified

(iv) clearly taxes income computed under the Seventh Schedule without distinguishing between old and new contracts. The provision contains no exemption or transitional arrangement for pre-existing Islamic finance agreements. Therefore, all qualifying income is to be taxed uniformly, irrespective of when the underlying contract was executed.

38. This Court is unable to accept the petitioner's argument that the levy of Super Tax under Section 4C is retrospective merely because the Islamic financing contract was executed before the provision was introduced or its rate was enhanced. Section 4C does not tax the execution of the contract; it taxes the income that accrues and is recognized during the relevant tax year. Although the contract may have been signed earlier, the income earned from it each year is a fresh taxable event governed by the law in force for that tax year. Therefore, the levy is prospective, not retrospective. Likewise, the petitioner has no vested right to remain subject to the same tax rate or fiscal regime, as the Parliament is competent to amend tax laws and apply them to income earned in future tax years.

39. Another important fact is that the petitioner itself has consistently recognized income from Islamic financing on an accrual basis and has offered such income to tax in the year in which it was recorded in its accounts under the ITO, 2001. By doing so, the petitioner accepted that the income becomes taxable in the year it accrues, regardless of when the financing contract was executed. Therefore, it cannot adopt a different position only to avoid liability under Section 4C. Such a selective approach is contrary to the scheme of the Ordinance. Moreover, Rule 3 of the Seventh Schedule makes it clear that the accounting treatment adopted under the State Bank of Pakistan's guidelines does not affect the computation of taxable income or tax liability. In the absence of any express statutory exemption, income arising from Islamic financing remains taxable under the ITO, 2001. The interpretation proposed by the petitioner would lead to unreasonable and arbitrary results. If accepted, two banking companies earning the same income in the same tax year and following the same accounting method

Uncertified

could face different tax liabilities merely because their financing agreements were executed on different dates. Such a distinction has no connection with the purpose of Section 4C, which is to levy Super Tax on the income earned during the relevant tax year. Since the law does not make any distinction based on the date of the financing agreement, this Court cannot read such a condition into the statute. Therefore, the petitioner's interpretation cannot be accepted as it would defeat the object of the law and create unequal treatment among similarly placed taxpayers.

40. For the reasons discussed above, this Court holds that the liability under Section 4C of the ITO, 2001, depends on the income that accrues and is recognized during the relevant tax year, and not on the date when the financing arrangement, investment, or Islamic banking contract was originally executed. The taxable event is the earning and recognition of income during the tax year in which Section 4C applies. The date on which the source of that income came into existence is irrelevant. Accepting the petitioner's interpretation would be contrary to the annual scheme of taxation under the Ordinance, the special tax regime for banking companies under the Seventh Schedule, and the settled principles of income taxation. The same argument has also been considered in **Civil Appeal No. 1243 of 2020** titled ***M/s DG Khan Cement Company Limited and another vs. The Federation of Pakistan through Secretary Revenue, Islamabad and others***, which further supports the conclusion that the petitioner's contention has no support in the language or scheme of the Ordinance. The said contention was expressly examined and rejected, as is evident from paragraph 89 of the judgment, reproduced hereunder:-

> *"89. Dr. Farogh Naseem, ASC appearing for banking companies, relied heavily on Rule 7C of the Seventh Schedule to contend that the super tax imposed upon banks for Tax Year 2023 and onwards operated retrospectively in the same manner as the super tax imposed upon other taxpayers for Tax Year 2022. On that basis, it was argued that banking companies were entitled to the same relief that had earlier been granted*

Uncertified

by the Islamabad High Court. The submission, however, was found to be untenable. The Court observed that banking companies had been expressly excluded from the ambit of Section 4C for Tax Year 2022 through the proviso appended to subsection (1). Subsequently, by virtue of the Second Proviso to Division IIB of the Seventh Schedule, banks were specifically brought within the charge of super tax for Tax Year 2023 and onwards. Consequently, the issue of retrospective taxation did not arise in their case. The statutory framework had already placed banking companies on notice, prior to the enactment of the Finance Act, 2023, that Section 4C would apply to banking income from Tax Year 2023 at the prescribed rate of 10%. Since the Finance Act, 2023 did not alter or enhance that rate insofar as banks were concerned, the contention that banks were retrospectively subjected to super tax was held to be factually incorrect. The Supreme Court further held that the Islamabad High Court, in granting relief to banking companies in the Pakistan Oilfields case on this premise, had proceeded on a material misapprehension of the statutory scheme. Accordingly, that finding was declared unsustainable in law and was set aside.

90. The Islamabad High Court, in the Fauji Fertilizer Judgment, read Section 4C down by excluding from its operation any source of income subject to a final or presumptive tax regime, on the ground that such income stood outside the scheme of Section 4C. In light of our discussion above, the learned Single Judge's finding proceeded on the twin premises that all sources listed in Section 4C(2)(i) are "presumptive" and that "presumptive" income stands outside the scheme of income tax. Both premises are, for the reasons discussed above, factually and legally incorrect. The learned Judge's reading-down of Section 4C on this ground cannot be sustained, and is to the extent of this finding set aside.

91. For the foregoing reasons, we hold that Section 4C validly applies to all four categories of income enumerated in sub-section (2), without distinction between the normal, final, minimum, and separate regimes of the Ordinance. The composite definition is the legislature's considered answer to the risk of discrimination between taxpayers whose incomes arise under different regimes. The imputation mechanism in sub-section (2)(iii), read with Section 28A, operates not to burden FTR taxpayers with a heavier levy but to bring them to parity with normal-regime taxpayers. Section 100B places the application of Section 4C to capital

Uncertified

gains on listed securities beyond argument. The findings of the Islamabad High Court reading Section 4C down to exclude FTR and separate-regime income, and granting related relief to banking companies, cannot be sustained and are set aside to that extent."

41. Another important aspect is that the show-cause notice issued by the Additional Commissioner Inland Revenue, LTO Karachi, has already been decided through a final order, against which the petitioner has filed an appeal, ITA-115/KB/2025 before the Appellate Tribunal Inland Revenue (ATIR), Karachi. Having already invoked the statutory appellate remedy, the petitioner cannot simultaneously pursue the present constitutional petition on the same cause of action. It is a settled principle that where an effective and adequate alternative remedy has been availed, High Court ordinarily does not exercise its extraordinary jurisdiction under Article 199 of the Constitution. Permitting parallel proceedings before different forums would defeat the statutory scheme and is not permissible in law.

42. Apart from the objections regarding territorial jurisdiction and parallel proceedings, the petitioner's own conduct clearly shows that an effective and adequate alternative remedy was available under the Inco ITO, 2001. The petitioner participated in the departmental proceedings, allowed a final order to be passed, and then filed an appeal before the Appellate Tribunal Inland Revenue (ATIR), Karachi. By doing so, the petitioner accepted the statutory remedy provided under the Ordinance. The Ordinance provides a complete appellate mechanism for resolving tax disputes through specialized forums. It is a settled principle that High Court should not exercise its constitutional jurisdiction under Article 199 where an effective statutory remedy exists and has already been availed of, unless exceptional circumstances are shown. Since no such exceptional circumstances exist in the present case, interference by this Court is not warranted. In ***M/s Sprint Oil and Gas Services Pakistan FZC, Islamabad vs. Oil and Gas Development Company Limited (OGRA), Islamabad***, **(2024 PTD 221),** the Honourable Supreme Court Court held that: -

Uncertified

> *"8. Pakistan is a Federation comprising of four provinces and the Islamabad Capital Territory. The Constitution provides a High Court for each province and, subsequently, the Islamabad High Court was established in 2010. Each province can enact laws with regard to their respective territories, and only the High Court of the said province can interpret them. Therefore, the said four provincial laws (mentioned above in paragraph 1) could only have been interpreted by the High Court of the province in which they had been enacted, and not by the Islamabad High Court. Admittedly, the petitioner did not carry out any of the cementation works in the Islamabad Capital Territory, nor was the applicability and/or interpretation of a Federal law required, which may have required consideration by the Islamabad High Court. The Islamabad High Court, therefore, lacked jurisdiction, and should not have entertained the writ petition filed by the petitioner on this ground alone.*
>
> *9. The petitioner, however, faced other hurdles in invoking the High Court's constitutional jurisdiction under Article 199 of the Constitution which could only be invoked when no other adequate remedy is provided by law'. In the instant case the petitioner had other adequate remedy, either by invoking the arbitration clause in the contracts or by filing a suit.*
>
> *10. The High Court's jurisdiction under Article 199 of the Constitution may also not be invoked when contracts have to be interpreted, and all the more so when they are technical and/or complex, as in the instant case, nor when evidence is required to be recorded. In the exercise of its writ jurisdiction, under Article 199 of the Constitution, a High Court also does not enter into the realm of disputed facts."*

43. For the reasons discussed above, this Court is of the considered view that the present constitutional petition is not maintainable. The petitioner has failed to show that any part of the cause of action arose within the territorial jurisdiction of this Court. The record also shows that the petitioner had an adequate and effective remedy under the ITO, 2001, which it voluntarily pursued by participating in the departmental proceedings and filing an appeal before the Appellate Tribunal Inland Revenue, Karachi. Therefore, this Court cannot exercise its constitutional jurisdiction under Article 199 of the Constitution.

Uncertified

Moreover, the main issue regarding the applicability of Section 4C of the ITO, 2001, has already been conclusively decided by the Honourable Federal Constitutional Court in M/s DG Khan Cement case reported as **2026 PTD 625**, which is binding on this Court. The petitioner has failed to establish any illegality, jurisdictional error, constitutional violation, or infringement of any fundamental right. Consequently, the instant constitutional petition, being not maintainable and without merits, is hereby **dismissed**. The interim order(s), if any, stand vacated, all pending applications are disposed of, and there shall be no order as to costs.

(MUHAMMAD AZAM KHAN)
JUDGE

(INAAM AMEEN MINHAS)
JUDGE

Announced in open Court on 23.07.2026.

JUDGE **JUDGE**

R.Anjam

Uncertified