

**THE FEDERAL TAX OMBUDSMAN
ISLAMABAD**

COMPLAINT NO.16418/KHI/IT/2026

Dated: 10.09.2026* RO, Karachi
(Tax Year 2025)

M/S. CROWN HOLDINGS LIMITED

...Complainant

Registration # 7591062

Survey Plot No.672-673, Deh Joreji

Taluka, National Highway

Malir Bin Qasim town, Karachi.

Versus

The Secretary,
Revenue Division,
Islamabad.

...Respondent

Dealing Officer	:	Mr. Sahibzada Abdul Mateen, Advisor
Appraised by	:	Mr. Muhammad Tanvir Akhtar, Advisor
Authorized Representative	:	Mr. Muhammad Zeeshan, A.R.
Departmental Representative	:	Mr. Aijaz Ali Channa, ACIR, CTO-II, Karachi.
Date(s) of hearing	:	28.09.2026 & 06.10.2026

FINDINGS / RECOMMENDATIONS

The above-mentioned complaint has been filed under Section 10(1) of the Federal Tax Ombudsman Ordinance, 2000 (FTO Ordinance) against non-issuance of Refund for Tax Year 2025 by the Commissioner Inland Revenue, Refund Zone, Corporate Tax Office-II (CTO-II), Karachi.

2. Briefly stated, the complainant is an Individual deriving income from rent of property, export of services and manufacturing of Auto Parts and is assessed to tax with CTO-II, Karachi. The complainant filed refund applications u/s.170 of the Income Tax Ordinance, 2001 for Tax Year 2025, claiming refund of Rs.12,070,789/- on 09.04.2026.



* Date of registration with FTO Secretariat

3. The above-mentioned refund claims arise due to tax deductions made under u/s.151(1)(b) (Profit on Debt from Bank accounts), u/s.155 (Rent on immoveable property), u/s.153(1)(a) (on payment for goods) and u/s.231B(1) (Motor-vehicle Registration Fee) and u/s.235(on electricity bills) of the Income Tax Ordinance, 2001 which are adjustable taxes. The Department did not take cognizance of the refund application and failed to initiate any proceedings in that regard, hence this complaint.

4. The complaint was referred to the Secretary Revenue Division, Government of Pakistan for comments and hearing by the Departmental Representative (D.R.), in terms of Section 10(4) of the FTO Ordinance read with section 9(1) of the Federal Tax Ombudsman Institutional Reforms Act, 2013. However, the Respondent Department has failed to furnish Para-wise comments to rebut the stance taken by the complainant despite sufficient opportunity of hearing.

5. The A.R. of the complainant joined the proceedings and made submissions which were considered and record perused. The Departmental Representative attended on the date of hearing on 28.09.2026 and requested for adjournment which was granted upto 06.10.2026, but none attended nor any Para-wise comments filed till date.

6. **FINDINGS:**

- i. This is a corporate case involving a substantial amount of refund. Inattention and ineptitude of officers of CTO-II Karachi can be judged from the fact that neither Parawise comments were filed nor departmental position was explained at the time of hearing.



- ii. It has been established that the complainant filed refund application under Section 170 of the Income Tax Ordinance, 2001 for Tax Year 2025, claiming refund of Rs.12,070,789/- on 09.04.2026. However, the Department did not process the said application. Refund claims are normally required to be processed within sixty days from the date of filing of the application in terms of Section 170(4) of the Income Tax Ordinance, 2001.

It has been found that the concerned officer did not attend to the refund applications with the diligence and attention required under the law and failed to act within the prescribed timelines. This omission amounts to "maladministration," as it constitutes neglect, inattention, and inefficiency as defined under Section 2(3)(ii) of the FTO Ordinance, 2000.

RECOMMENDATIONS:

7. FBR to direct;
- (i) CCIR, CTO-II Karachi to look into the failure of his officers as detailed above and ensure that no such walk-over will be accorded to the Complainants in FTO cases;
 - (ii) the Commissioner-IR, Refund Zone, CTO-II, Karachi to dispose of refund claimed for the Tax Year 2025, in accordance with law after providing opportunity of being heard; and
 - (iii) report compliance within 30 days.



14 OCT 2026

Dated:

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(M. Zafar ul Haq Hijazi)
Federal Tax Ombudsman