

**THE FEDERAL TAX OMBUDSMAN
ISLAMABAD**

COMPLAINT NO.16628/ISB/IT/2026

Dated: 14.09.2026* HQ Islamabad

M/s Nawab Energy Pvt Ltd,
(Registration No. 7555899),
Plot No. 298, Street No. 03,
Sector I-9/3, Industrial Area,
Islamabad.

...Complainant

Versus

The Secretary,
Revenue Division,
Islamabad.

...Respondent

Dealing Officer	:	Mr. Muhammad Naseer Butt, Advisor
Appraised by	:	Mr. Khalid Javed, Advisor
Authorized Representative	:	Mr. Naeem, FCA
Departmental Representative	:	Mr. Asif Jamali, ADCIR, RTO, Bahawalpur (Video Link Hearing)
Date of hearing	:	14.10.2026

FINDINGS/RECOMMENDATIONS

The complaint was filed under Section 10(1) of the Federal Tax Ombudsman Ordinance 2000 (FTO Ordinance) against the delay in deciding the application for transfer of tax jurisdiction from RTO, Bahawalpur, to CTO, Islamabad. The case was fixed for 28.09.2026 calling for comments. The RTO, Bahawalpur and RTO, Islamabad filed parawise comments, which were examined and placed on file. However, on due date reply/para-wise comments were not received from Secretary (Jurisdiction), FBR. The case was fixed for hearing on 14.10.2026 and the Secretary (Jurisdiction), FBR was directed to attend hearing along with parawise comments. The AR and DR from RTO, Bahawalpur attended. However, the DR from the Board neither joined proceedings nor were comments filed. Arguments were heard and record perused and complaint is disposed of as per available record as under.

* Date of registration with FTO Secretariat



2. The complainant stated that M/s Nawab Energy (Private) Limited is operating in the field of "Sale of LPG" who is aggrieved by delay in processing of their application for transfer of tax jurisdiction from RTO, Bahawalpur, to CTO, Islamabad. The complainant further stated that online application for change of Jurisdiction was filed on 09.06.2026 on the basis of change of address.

3. The complainant further stated that the application was filed online as per instructions issued by FBR through Circular No. 03 of 2025-26 dated 10.08.2025. The complainant further stated that the registered office / principal place of business was changed to Plot No. 298, Street No. 3, Sector I-9/3 Industrial Area, Islamabad and this change was duly updated in SECP records, relevant "Certified to be True Copy" duly issued by SECP was attached with change of jurisdiction application filed on 09.06.2026.

4. The complainant further stated that several reminder requests to proceed their application but no response received from the department. Furthermore, the FBR issued Circular No. 03 of 2025-26 dated 10.09.2025 for the purpose of "fully automated process of change of major jurisdiction and improve service delivery by FBR". However, despite lapse of 3 months online application is still pending on part of Chief Commissioner, RTO Bahawalpur, neither issued NOC nor any action taken on online application. **The complainant prayed** that jurisdiction may kindly be directed to be transferred.

5. The RTO, Islamabad filed written comments wherein, they stated that the taxpayer had initially applied for change of jurisdiction from Regional Tax Office (RTO), Bahawalpur to CTO Islamabad. Subsequently, the jurisdiction of CTO Islamabad was abolished, and the application was accordingly placed before RTO Islamabad.

The RTO, Islamabad further stated that the taxpayer has now been advised to submit an application for change of jurisdiction online



through the prescribed system. However, at present, the taxpayer's earlier application is not appearing in the system/portal of RTO Islamabad. Consequently, the taxpayer has been requested to submit a fresh online application so that the request may be processed accordingly.

6. The RTO, Bahawalpur also filed written comments wherein, they stated that the company; M/s Nawab Energy (Pvt.) Limited is registered as manufacturer and business premises are located at Bypass Road, near Shan Flour Mills, KLP Road, Sadiqabad. The taxpayer is registered with FBR on 10.08.2017 and jurisdiction was assigned to RTO Bahawalpur on the basis of place of business activity.

7. The RTO, Bahawalpur further stated that later on, taxpayer filed online application for change of major jurisdiction from RTO Bahawalpur to CTO Islamabad vide letter dated 09.06.2026. Furthermore, the company has changed its registered office at Plot No. 298, Street No. I-9/3, Industrial Area Islamabad but principal business activity is being carried out at KLP Road, near Shan Flour Mills, Bypass Road, Sadiqabad within the jurisdiction of RTO Bahawalpur.

8. The RTO, Bahawalpur further stated that the application of the taxpayer was taken up and rejected accordingly. The grounds for change of major jurisdiction were not plausible due to the reason that principal place of business/ manufacturing facility is located at KLP Road, near Shan Flour Mills, Bypass Road, Sadiqabad within the jurisdiction of RTO Bahawalpur. As per Rule 5(1)(b) of Sales Tax Rules 2006, the jurisdiction falls within such RTO where person's principal place of business exists and if the company is primarily engaged in manufacturing or processing, the place where the factory is situated. During hearing on 14.10.2026, the DR from RTO,





Bahawalpur, was specifically directed to submit comments regarding the transfer of income tax jurisdiction. However, no response or comments were received from the department.

9. However, it is noted that Secretary (Jurisdiction), FBR and has failed to file parawise comments to allegations of the complainant and also failed to attend hearing despite service of notices. **The Chairman FBR is advised to look into this lapse on his own and take appropriate action against the delinquent officers and ensure that no such lapse occurs in future.**

10. Perusal of complaint and record shows that the complainant M/s Nawab Energy (Pvt) Ltd is a private limited company which came up before this forum to seek direction to the department to change its tax jurisdiction from RTO, Bahawalpur to CTO, Islamabad. Record further shows that the complainant moved online application on 09.06.2026 for change of his tax jurisdiction from RTO, Bahawalpur to CTO, Islamabad. It is further noted that the complainant shifted his registered office from Bahawalpur to Islamabad and the change was approved by the Securities and Exchange Commission of Pakistan (SECP). **The complainant filed 06 cases in support of his stance.** Perusal of these cases shows that all 6 cases were assigned tax jurisdiction where their principal business activity was located. The one case had multiple businesses but the principal business activity was located in Lahore and on that basis the case was assigned to CTO, Lahore. Therefore, reliance on the said profiles by the complainant is not found relevant to his stance.

11. Section 209 (1) of the Income Tax Ordinance, 2001, empowers the Federal Board of Revenue (FBR/Board) to assign/transfer jurisdiction in respect of cases or persons to Commissioners. Furthermore, subsection (8A) expressly provides that the power to confer jurisdiction includes the power to transfer jurisdiction from one

income tax authority to another. Therefore, the request for transfer of income tax jurisdiction must be considered and decided by the competent authority/Board in accordance with section 209 and the applicable jurisdictional arrangements.



12. The record further shows that the complainant submitted application for change of his tax jurisdiction through online Iris portal. In terms of Circular No. 03 of 2025 of IR Wing dated 10.09.2025, FBR laid down that all applications for change of major jurisdiction shall be submitted through the Jurisdiction Module in Iris, and that the requisite NOC from the concerned Chief Commissioner shall also be issued online in Iris in response to such application. The application of the taxpayer dated 30.06.2026 is still pending with the Secretary (Jurisdiction) FBR, who failed to ensure compliance with the said circular whereas as he was required to get NOCs from the concerned tax offices online for expeditious disposal of such applications.

13. This delay/inaction is manifestation of departmental neglect, inattention and ineptitude in discharge of its duties and the same is tantamount to maladministration in terms of section 2(3)(ii) of the FTO, Ordinance, 2000.

RECOMMENDATIONS:

14. FBR to: -

- (i) direct Secretary (Jurisdiction) FBR to dispose of the pending application of the complainant for change of tax jurisdiction on merits and in accordance with law and as facts of the case; and
- (ii) report compliance within 30 days.

Dated:

16 OCT 2026

(M. Zafar ul Haq Hijazi)
Federal Tax Ombudsman