

IN THE OFFICE OF SENATOR PERVAIZ RASHID ADJUDICATOR
PAKISTAN SPORTS BOARD, ISLAMABAD

Petition No. 6 of 2026

Arising out of

W.P. No. 2496 of 2025

Muhammad Saleem Akhtar
Versus
Federation of Pakistan & others

Date of hearing: 09-06-2026

ORDER

1. This order shall decide Petition No. 6 of 2026, arising out of Writ Petition. No. 2496 of 2025 titled *Muhammad Saleem Akhtar versus Federation of Pakistan & others*, referred to this forum vide letter bearing No.7-53/2020-PSB(NF) dated 04-06-2026 pursuant to the order dated 19-05-2026 passed by the Hon'ble Islamabad High Court, Islamabad, whereby Pakistan Sports Board was directed to treat the writ petition as an appeal/petition and place the same before the competent appellate authority for decision in accordance with law.
2. The petitioner, Mr. Muhammad Saleem Akhtar, claiming himself to be Senior Vice President of the Chess Federation of Pakistan, challenged the constitution of the PSB Inquiry Committee dated 05-06-2024, the inquiry report dated 02-07-2024, endorsement dated 05-08-2024 relating to the General Body meeting dated 15-07-2024, and Election Notification dated 20-06-2025 issued by the PSB Election Commission.
3. Notice was issued to all concerned parties. The matter was fixed for hearing on 09.06.2026. The petitioner was represented through Mr. Mohammad Hanif Qureshi, through power of attorney and addressed arguments. Mr. Omer Khan, Mr. Kashif Saleem, Mr. Raja Gohar Iqbal and other concerned parties appeared and submitted their respective statements/replies and documents. Representatives of PSB produced the relevant record, whereas Mr. Saif ur Rehman Rao, Legal Advisor, PSB, assisted this forum. All parties were heard at length and the available record was carefully perused.
4. The first question requiring determination is whether Pakistan Sports Board had jurisdiction to constitute an inquiry committee and take regulatory steps in relation to the affairs of the Chess Federation of Pakistan. The answer is in the affirmative. PSB is a statutory body constituted under the Sports (Development and Control) Ordinance, 1962 and governed by the Pakistan Sports Board Constitution, 2022. Under Article 3 of the PSB Constitution, PSB is the autonomous governing body for regulation, administration, management and promotion of sports in Pakistan. Under Article 7, PSB is vested with functions to regulate, monitor and supervise

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National Sports Federations. Under Article 16, affiliation and continued recognition of National Sports Federations is subject to compliance with PSB's constitutional and regulatory framework. Article 21 empowers PSB to take action in cases of irregularities and non-compliance, while Article 23 provides the dispute resolution/adjudicatory mechanism. Article 17 further provides for the Election Commission for transparent elections of National Sports Federations.

5. This forum further observes that Article 22 of the Pakistan Sports Board Constitution, 2022 unequivocally provides that any Sports Organization desirous of regulating and controlling sports in Pakistan, using the name "Pakistan", representing Pakistan at national or international forums, or availing benefits and recognition from Pakistan Sports Board, is under a legal obligation to comply with the laws of the land, the policies and regulatory framework prescribed by PSB, and maintain registration under Section 42 of the Companies Act, 2017; failing which such organization becomes liable to regulatory action and may forfeit its right to use the name "Pakistan", regulate the sport concerned, or represent Pakistan in national and international sports events and forums.
6. The Constitution of the Chess Federation of Pakistan also recognizes internal constitutional discipline and the authority of its General Body. Article 10(c) of the CFP Constitution provides that the supreme authority of the Federation vests in the General Body. Article 10(e)(ii) permits convening of an Extra-Ordinary General Body Meeting upon requisition signed by one-third of the strength of the General Body. Article 8(b) deals with suspension of members/functionaries/office bearers by the President in consultation with the General Body. Article 13(iv) provides that emergency actions taken by the President must be reported to the General Body and if not approved by majority, shall stand withdrawn. Article 24 relates to elections under the sports policy duly approved by PSB, while Article 26 provides that an office bearer, including the President/Secretary General, may be impeached for serious misconduct or lack of interest in promotion of chess activities if charges are approved by two-third majority of the General Body.
7. This forum further observes that the apprehension regarding possible sanctions by FIDE is misconceived and unsupported by the governing framework of the FIDE Charter, 2020. Article 4.10 of the FIDE Charter expressly provides that FIDE shall observe strict neutrality in the internal affairs of its member federations while retaining the right to evaluate compliance with FIDE principles. Furthermore, Article 11(c) mandates that member federations must comply with their own statutes, rules and regulations, whereas Article 11(q) specifically requires that general assemblies and elections be organized in accordance with the federation's statutes and the applicable national legal order. The Constitution of the Chess Federation of Pakistan itself recognizes and requires elections to be conducted in

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accordance with the national sports framework approved by Pakistan Sports Board. Consequently, compliance with the Pakistan Sports Board Constitution, 2022, the National Sports Policy, the Sports Election Regulations Pakistan (SERP), 2024 and other applicable laws of Pakistan is fully consistent with the obligations imposed by the FIDE Charter. Rather than constituting a violation of FIDE requirements, adherence to the national legal framework is a mandatory obligation under the FIDE Charter itself. Therefore, the contention that the actions undertaken by Pakistan Sports Board or the conduct of elections under its regulatory framework may attract adverse consequences from FIDE is without lawful basis

8. In view of the above legal framework, the General Body of CFP is a material constitutional forum for internal governance, whereas PSB retains regulatory oversight over affiliated National Sports Federations. Registration under the Companies Act or affiliation with an international body does not oust PSB's jurisdiction where the Federation seeks recognition, affiliation, national representation and regulatory benefits under the sports governance structure of Pakistan. The Honourable Supreme Court of Pakistan in 2012 SCMR 992 has recognized that affiliated sports federations are bound to comply with lawful directions of PSB.
9. The inquiry committee dated 05-06-2024 was constituted in the background of persistent internal disputes, rival claims, allegations of financial mismanagement, suspension/removal of office bearers, disputed correspondence and complaints arising within CFP. The committee was fact-finding in nature and its report dated 02-07-2024 did not, by itself, finally determine civil rights of the petitioner. Rather, it was an administrative and regulatory exercise aimed at ascertaining facts and restoring governance discipline. Therefore, the challenge to constitution of the inquiry committee and its report is not sustainable.
10. The petitioner has also challenged the General Body meeting dated 15-07-2024 and endorsement dated 05-08-2024. The record shows that the said meeting was attended by a substantial number of General Body members and was observed by representatives of PSB. The petitioner asserts that the meeting was illegal, whereas the contesting respondents maintain that the General Body, being supreme under Article 10(c) of the CFP Constitution, was competent to decide internal matters including impeachment under Article 26. This forum is of the view that PSB's endorsement dated 05-08-2024 was regulatory and consequential in nature, based upon the record placed before it at the relevant time. No mala fide or jurisdictional defect sufficient to nullify the endorsement has been established.

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11. The statements of Mr. Omer Khan and Mr. Kashif Saleem have also been examined. Both statements contain admissions of certain procedural lapses and also raise objections regarding legality of subsequent meetings and electoral processes. However, these statements also reflect continuing factional dispute within the Federation and do not, by themselves, establish that PSB acted without lawful authority in constituting the inquiry committee or taking regulatory measures. Rather, the material available confirms existence of a governance dispute requiring regulatory oversight under Articles 16, 21 and 23 of the PSB Constitution, 2022.
12. The petitioner's challenge to Election Notification dated 20-06-2025 also cannot be accepted. Article 17 of the PSB Constitution provides the mechanism of Election Commission for elections of National Sports Federations, while Article 24 of the CFP Constitution itself contemplates elections under the sports policy duly approved by PSB. The election process was therefore within the regulatory field of PSB. Moreover, the petitioner's claimed tenure related to the 2022-2026 term, which has now expired by efflux of time. Subsequent election proceedings for the next tenure have also taken place. Therefore, even otherwise, the grievance against Election Notification dated 20-06-2025 has substantially been overtaken by subsequent events and has become infructuous to that extent.
13. It is further noted that the Hon'ble Islamabad High Court referred the matter to the statutory forum on the principle that where an efficacious alternate remedy exists, the parties should first exhaust the same before invoking constitutional jurisdiction. This forum has accordingly examined the matter on the basis of available record. Upon such examination, it is found that PSB acted within its statutory and regulatory mandate and no ground has been made out for setting aside the inquiry committee dated 05-06-2024, inquiry report dated 02-07-2024, endorsement dated 05-08-2024, or Election Notification dated 20-06-2025.
14. Accordingly, Petition No. 6 of 2026 arising out of Writ Petition. No. 2496 of 2025 is dismissed. However, all future electoral processes and governance actions concerning Chess Federation of Pakistan shall be undertaken strictly in accordance with the Pakistan Sports Board Constitution, 2022, Sports Election Regulations, applicable law, the Constitution of Chess Federation of Pakistan and any order passed by a competent Court/forum.
15. Announced on this ____ day of June, 2026.



SENATOR PERVAIZ RASHID
Adjudicator
Pakistan Sports Board, Islamabad