

**Haidermota BNR**  
15 Zafar Ali Road,  
Gulberg V  
Lahore

**19<sup>th</sup> November 2018**

*(By Courier & Email)*

**Subject: LEGAL NOTICE UNDER SECTION 8 OF THE DEFAMATION ORDINANCE, 2002**

Dear Sirs,

We refer to your rejoinder of 16<sup>th</sup> November 2018 on the subject.

It is intriguing to note that your client is not a proponent of the fundamental principle of transparency as is applicable to all matters pertaining to statutory entities. Your client is absolutely correct that no policy viz transparency and accountability was put in place by him during his tenure as Chairman or in the past. It is highly unfortunate that today your client's fundamental grievance arises from an act of transparency on the part of a statutory entity.

Transparency and accountability does not necessarily require a written policy or precedent; it's an obligation incumbent upon the management of every statutory entity and we can assure you that it will be diligently ensured by the current management of the Pakistan Cricket Board irrespective of your client's desire to propagate non transparency in such affairs.

We have already explained why the PSL Allowance amount is included in the Chart notwithstanding that the first installment having been delivered through a cheque was misplaced by your client. The Chart shows the amounts which are paid or payable as per the records of the Pakistan Cricket Board and the PSL Allowance in particular is an amount which was approved for payment to himself under the signatures of your client on an approval note available in our Client's record.

As to the statement of your client that no cheque was ever received by him we would like to refer him to his own email dated 17<sup>th</sup> September 2018 sent to the CFO Pakistan Cricket Board stating categorically that two cheques given to him, of which one was the cheque for the 1<sup>st</sup> installment of the PSL Allowance in the amount of Rs.6,064,516 had been misplaced and to hence stop payment of these two cheques. It appears your client has not shared all the relevant information and evidence with you on this subject.

**ISLAMABAD**

2<sup>ND</sup> FLOOR, BLOCK/BUILDING NO.3,  
SHAHBAZ CENTRE, SHAHRA-E-SOHARWARDI,  
G-6/1, ISLAMABAD, PAKISTAN  
TEL: +92-51-2624792-4

**WEB: WWW.RKALAW.CO**

**LAHORE**

2<sup>ND</sup> FLOOR, E PLOMER BUILDING,  
26 THE MALL, LAHORE,  
PAKISTAN.  
TEL: +92 42 37313090

**PESHAWAR**

OFFICE NO. 35 C, 2ND FLOOR,  
CANTONMENT PLAZA,  
SADDAR ROAD,  
PESHWAR CANTONMENT,  
PESHAWAR, PAKISTAN.

**KARACHI**

#C-27/1 OPP. CHINA CONSULATE  
BLOCK 4, CLIFTON, KARACHI  
PAKISTAN  
TEL: +92 21 35876526

As to your client's claim that majority of the allowances and reimbursement of expenses were not approved retrospectively, we would remind your client to revisit his record as the PSL Allowance for the years August 2015 till July 2017 was approved through a manipulated process initiated by your client in the form of a circular resolution on 16<sup>th</sup> February 2018 sent to handpicked members of the Board on the instructions of your client and where such resolution included incorrect statements of facts.

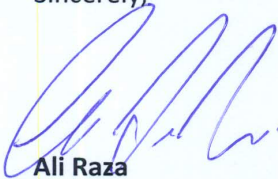
Similarly a Vehicle Allowance for the period 9<sup>th</sup> August 2017 till 30<sup>th</sup> June 2018 was paid to your client; which he approved himself on 2<sup>nd</sup> July 2018. The request for payment and approval both being retrospective and even otherwise being a payment, which is not amongst the perks and privileges of a chairman. Your client we are certain will recall that this allowance was apparently to compensate your client using his own armored vehicle until an armored vehicle was imported for him as chairman at his proposal at a cost of over Rs.30 million. The import of such vehicle has since been stopped.

It is in fact the policy of transparency adopted by the current management of the Pakistan Cricket Board, which has allowed your client to have in depth information and knowledge about the daily ordinary business of the Board and facts pertaining to each and every action of its current management. Your client can rest assured that all expenses incurred in respect of not only the Chairman but also each member of the Board of Governors of the Pakistan Cricket Board will be transparently disclosed as a part of the absolute policy of transparency on a regular basis.

Lastly, our Client restates its position taken in our Reply dated 9<sup>th</sup> November 2018 to your Legal Notice and has nothing further to add.

Our Client meanwhile retains its rights to pursue any and all legal remedies against your client at the appropriate time in respect of factually incorrect statements being made by your client publicly in the media.

Sincerely,



**Ali Raza**

Advocate Supreme Court  
Senior Partner