MILITARY LANDS AND CANTONMENTS DEPTT
LAHORE CANTONMENT BOARD

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15/14

B.L Committee P.S. post on website Dr (VP) 14/9/26

No. LCB/Med/Comm/1 5667-Reg
Dated the 10th September, 2026

To,

The Director General
Public Procurement and Regulatory Authority
Islamabad

Subject: **COMMUNICATION OF FINAL ORDER DATED 4 SEPTEMBER 2026 BLACKLISTING M/S INNER IMAGING CENTER PRIVATE LIMITED**

Reference: Rule 19 of the Public Procurement Rules 2004 and the applicable mechanism for blacklisting and debarment of bidders and contractors

2. It is submitted that please find enclosed a Final Speaking Order dated 4 September 2026 passed by the five-member Committee for Blacklisting and Debarment of Lahore Cantonment Board in the proceedings against M/s Inner Imaging Center (Private) Limited arising from its pre-qualification submission for the Cantonment Healthcare Complex.

3. After the notice, disclosure was relied upon record and opportunity of hearing, the Committee found that the company had engaged in fraudulent practice by presenting materially inaccurate information concerning its corporate experience, comparable institutional experience, stated surgical volumes, financial capacity and sworn assurance of authenticity and non concealment. The Committee accordingly blacklisted and debarred the company from participation in procurement proceedings of Lahore Cantonment Board for ten years, commencing on 4 September 2026 and expiring at the close of 3 September 2036, subject to any order passed in review or by a court of competent jurisdiction.

4. The enclosed Order concerns the company alone. The Committee also dismissed the independent charge under Rule 19 subsection (4) because the foreign exclusion placed before it did not name M/s Inner Imaging Center (Private) Limited. The PPRA record and any publication may kindly preserve these limitations exactly.

5. The Order is forwarded for placement on the Authority's official record and for such publication, circulation, registration and cross debarment action as is required or permitted under Rule 19 and the applicable regulations. The effective dates, identity of the blacklisted company, scope of the decision and findings recorded in the enclosed speaking order may kindly be reproduced without enlargement.

Email: lahorecb@gmail.com

6. You are requested to please share acknowledgement of receipt and confirmation of the action taken with this for completion of the Committee record. In case, should the Authority require the prescribed form, proof of service, constitution notification, evidence index or any certified portion of the proceedings, the same will be supplied through the Member and Secretary of the committee.

CANTONMENT EXECUTIVE OFFICER
LAHORE CANTT BOARD

BEFORE THE COMMITTEE FOR BLACKLISTING AND DEBARMENT
LAHORE CANTONMENT BOARD LAHORE

IN THE MATTER OF PROCEEDINGS UNDER RULE 19
PUBLIC PROCUREMENT RULES 2004

M/S INNER IMAGING CENTER (PRIVATE) LIMITED
through its Chief Executive Officer
Respondent

FINAL SPEAKING ORDER

Announced on 4 September 2026

CORAM

Mr Wajid Aziz Khan, Chairman
Mr Bilal Mazhar, Member and Secretary
Mr Muhammad Arfan Randhawa Advocate, Member
Lt. Col. Yasir Ahsan, Member
Abdul Samad Khan, Member

ORDER OF THE COMMITTEE

1. These proceedings concern the integrity of the qualification information submitted by M/s Inner Imaging Center (Private) Limited for the furnishing, completion, operation and management of the Cantonment Healthcare Complex, a proposed 500 bed teaching hospital and medical college at Sarfraz Rafiqui Road, Lahore Cantonment. The question before this Committee is confined to the Respondent company's fitness to participate in public procurement. It is not a proceeding to determine title to the project, enforce or avoid a contract, decide the pending intra court appeals, recover damages, or impose liability upon any person who was not cited as a respondent.

2. The record establishes a sustained course of materially inaccurate representation across the principal heads of qualification. The Respondent attributed to itself decades of experience that it later said belonged collectively to its promoters; relied upon ambulatory day care facilities as comparable foreign institutional experience; submitted monthly surgical volumes which it later sought to recast as annual figures; and relied upon the accounts or resources of a separate foreign entity without proving an enforceable right to those funds. Those matters were not peripheral. They went directly to the experience, operational and financial criteria by which the Respondent sought access to a major public healthcare asset.

3. For the reasons that follow, Charges A, B, C and D are proved. Charge E is proved only to the extent that the Respondent's sworn assurance of authenticity and non concealment was inconsistent with the material information presented and withheld in support of its own qualification. Charge F under Rule 19(4) is not proved because the foreign exclusion in evidence does not name the Respondent company. The sanction is therefore founded upon fraudulent practice under Rule 19(1)(a), and not upon foreign cross debarment under Rule 19(4).

CONSTITUTION PARTIES AND LIMITS OF JURISDICTION

4. The matter was heard and determined by the separately constituted three member Committee for Blacklisting and Debarment notified vide Notification No. 3668/CGH/Blacklisting-Committee/2026

dated 28 July 2026. Each member named in the coram participated in the consideration of the record and in the decision. The Committee referred to in CBR Item No. 49 is a different body. That CBR neither constitutes this Committee nor supplies any part of the authority exercised in this Order.

5. The sole respondent is M/s Inner Imaging Center (Private) Limited. Mr Ata Chaudhary, Dr Sadia Chaudhary and United Management Associates are not respondents. Their names may arise because particular documents were executed, supplied or explained through them, but that evidentiary reference does not confer jurisdiction to blacklist them personally. No personal, derivative, successor or alter ego sanction is made by this Order.

6. The Ministry of Defence communication dated 8 September 2023, the judgment dated 29 November 2024, the orders passed in the pending intra court appeals, the Board's treatment of the 2023 process, and the later revised proposal form part of the surrounding history. None is used as proof that a charge is true. This Committee neither interprets the final effect of the pending judicial orders nor determines whether any contractual or proprietary right survives. Its inquiry begins and ends with procurement integrity under Rules 18 and 19.

PROCEEDINGS AND OPPORTUNITY AFFORDED

7. The original show cause notice, No. 3668/CGH/Notice/4178-Reg dated 13 July 2026, identified the representations said to be false or materially inaccurate and called for an answer. The Respondent filed a detailed reply through counsel on 23 July 2026. The Committee has treated that reply as the company's answer and has considered the admissions, denials and explanations contained in it.

8. The Supplementary Charge Sheet and Corrigendum, No. 3668/CGH/4760-Reg dated 7 August 2026, corrected the arithmetical expression concerning surgical volume, expunged the recital concerning the Board's earlier administrative action, supplied further particulars, reframed the affidavit issue and separately raised Rule 19(4). The corrigendum thus narrowed and clarified the case; it did not preserve the erroneous arithmetic or convert the Board's earlier action into proof of misconduct.

9. By requisition dated 10 August 2026, the Respondent was required to produce the original and supporting corporate, affiliation, financial, licensing and affidavit documents within its possession or control. The hearing notice ultimately fixed 27 August 2026. An associate appearing for the Respondent sought additional time on that date. The request was accommodated, and 4 September 2026 was fixed as a final opportunity with notice of the consequence of continued default.

10. On 4 September 2026, counsel tendered two applications. The first sought an adjournment until the last week of September on the ground that foreign records had to be procured and lead counsel required further time. The second sought inspection of the record and authenticated copies of the evidence. The Committee disposed of both applications by its separately recorded interim order of the same date. In doing so it considered the time already afforded, the prior production demand, the access offered to the disclosed evidence, and the absence of any identified document which the Respondent could not reasonably answer. The applications were rejected and the matter was directed to proceed ex parte.

11. An ex parte direction is not a judgment by default. The burden remained upon the procuring agency to establish each charge from admissible and disclosed material. The Committee has therefore disregarded rhetoric, unverified internet material, internal strategy notes, allegations concerning obstruction of the project, and any item not authenticated or made available in accordance with the service and evidence registers. Non production has been used only where a document was specifically demanded, lay within the Respondent's peculiar knowledge or control, and was necessary to substantiate a positive explanation advanced by it.

QUESTIONS FOR DETERMINATION

12. The record gives rise to six questions: whether the Respondent materially misstated its own corporate experience; whether the foreign facilities relied upon were presented as comparable institutional experience without a proved legal or operational nexus; whether the stated surgical volumes were materially inaccurate; whether the Respondent presented another entity's resources as its own financial capacity; whether its sworn declarations were false in a material respect; and whether the Respondent itself was the subject of a foreign debarment attracting Rule 19(4). A seventh question concerns the nature and duration of any proportionate sanction.

PRELIMINARY OBJECTIONS

13. The objection that the proceedings are coram non judice is rejected. The correct jurisdictional instrument is the notification constituting this three member Committee. The objection proceeded, at least in part, upon material relating to a different committee. Once that distinction is maintained, no defect in composition is established on the record before us.

14. The pleas of limitation, laches and functus officio are also rejected. Rule 18 speaks of qualification information found "at any time" to be false, fictitious or materially inaccurate. That language preserves the procuring agency's duty to act when the falsity becomes known. It is reinforced by the Respondent's own sworn undertaking that its information was authentic and genuine, that nothing had deliberately been stated wrongly or concealed, and that a discrepancy found at a subsequent stage, even after announcement of success, could invite legal action and penalty.

15. The reliance upon the Ministry of Defence letter and the pending litigation does not answer the statutory inquiry. An administrative approval, a provisional qualification or a disputed claim to contractual performance cannot make inaccurate qualification information true. Equally, this Committee cannot use blacklisting as a means of deciding matters reserved for the Court. The present decision is sustainable only upon the procurement record and is expressly confined to that field.

16. The plea founded on Article 10A is rejected on the completed official record of service, disclosure and opportunity. The Respondent received the charges, answered the original notice, was given the corrected particulars, was required to produce the documents supporting its explanations, obtained further time, and was warned of the consequence of non appearance. The evidence relied upon was disclosed and available for inspection. The Committee has further protected fairness by narrowing Charge B, limiting Charge E, and rejecting Charge F where the proof does not reach the Respondent itself.

EVIDENCE AND STANDARD OF PROOF

17. The controlling evidence consists of the signed pre qualification dossier and affidavits, the scrutiny and evaluation record, the authenticated official records scheduled with the supplementary charge sheet, the Respondent's reply dated 23 July 2026, and the production, service and hearing registers. The Comprehensive Verification Report dated 6 May 2026 has assisted the organisation of the material, but it is not treated as self proving. Where the report and a primary record differ, the primary record controls.

18. Blacklisting carries serious civil consequences. The Committee has applied the balance of probabilities with care proportionate to that consequence. For each charge, it has required proof of the representation, proof that it was materially inaccurate, a connection with qualification, and circumstances supporting knowledge or recklessness. Suspicion, association and later non cooperation cannot substitute for proof of those elements.

CHARGE A CORPORATE EXPERIENCE

19. The Respondent's dossier invoked approximately 24 to 30 years of healthcare experience for the purpose of securing marks under the experience criterion. The SECP documents establish incorporation in 2017 under the former corporate name and a change to the present name in 2019. In paragraph 9 of its reply, the Respondent did not maintain that the company itself possessed the stated operating history. It explained that the period represented the collective and cumulative professional experience of its individual directors and promoters.

20. That explanation confirms the material distinction. A company may rely upon qualified personnel where the criteria permit; it may not present their careers as its own completed institutional history without saying so plainly and demonstrating how that experience is legally and operationally available to it. No joint venture, management agreement, assignment or comparable instrument was produced to bridge the gap. The statement was capable of materially affecting the experience assessment and was made at least recklessly.

Finding on Charge A PROVED against the Respondent company.

CHARGE B FOREIGN FACILITIES AND COMPARABLE CAPACITY

21. The dossier relied upon Global and Parkway facilities as evidence of relevant foreign experience. The authenticated NPI and New Jersey licensing records identify the cited facilities as ambulatory or day surgery centres with a limited number of operating rooms and without inpatient bed capacity comparable to the proposed 500 bed teaching hospital. The Respondent's reply accepts that they were outpatient or day care surgery centres, while denying that it ever claimed that either independently operated a 500 bed hospital.

22. The Committee accepts that qualification. We do not attribute words to the Respondent which the signed dossier does not contain. The proved misrepresentation is narrower: institutions lacking comparable inpatient and teaching hospital capacity were advanced as qualifying institutional experience without a clear disclosure of their limited nature and without proof that their experience belonged to, or was contractually available to, the Respondent. The requested affiliation, management and inpatient transfer instruments were not produced.

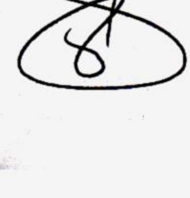
Finding on Charge B PROVED on the limited basis stated in paragraphs 21 and 22.

CHARGE C SURGICAL VOLUMES

23. The signed bidder record states monthly volumes of approximately 6000 procedures at one facility and 5000 at the other. The Respondent now says that 11000 was an annual network figure and that the word "monthly" was introduced through an error in the evaluation transcript. That defence would have required little to substantiate: the original page showing an annual figure, a contemporaneous correction, or identification of the officer to whom the correction was made.

24. None was supplied. The interrogatories asked for the maker, recipient, date, occasion and record of the alleged correction. They remained unanswered. The figures appear in the signed material attributed to the Respondent, and their conversion into daily throughput is irreconcilable with the licensed operating room capacity. The discrepancy is too large and too central to operational scoring to be treated as an immaterial slip.

Finding on Charge C PROVED. The monthly representation was materially inaccurate and made knowingly or recklessly.



CHARGE D FINANCIAL CAPACITY

25. The Respondent relied upon financial material of Metpath Laboratories Inc, including the account ending 9666, as support for its own financial standing. Its reply describes the connection as one of non executive investment or sleeping partnership. That answer does not show that the Respondent owned the funds, possessed a binding credit facility, or held an enforceable commitment making those resources available for this project.

26. The deficiency was not cured by audited accounts of the Respondent, a bank sanctioned credit line, a guarantee, or a corporate instrument lawfully placing the foreign entity's resources at the Respondent's disposal. The Committee does not rely upon the character of particular transactions appearing in the bank statement; that issue is unnecessary and potentially prejudicial. The decisive fact is the presentation of another legal person's account as evidence of the bidder's capacity without proof of legal availability.

Finding on Charge D PROVED against the Respondent company.

CHARGE E SWORN DECLARATIONS

27. The pre qualification submission was accompanied by notarised e stamp declarations whose identifiers and exact terms are recorded in the evidence register. They affirmed, in substance, the authenticity and genuineness of the information supplied, the absence of deliberate misstatement or concealment, and the litigation or blacklisting position stated in the declarations. The charge must be measured against those actual words. It cannot be enlarged into a general warranty concerning every proceeding involving every director, investor or associated concern.

28. The authenticated record and the Respondent's own reply nevertheless establish that material adverse matters connected with the very persons, facilities and entities invoked to establish experience or financial capacity existed when the declarations were submitted. The reply disputes their gravity and effect, but it does not show that the relevant matters were candidly disclosed alongside the credentials derived from those same sources. The Respondent could not rely upon their favourable attributes for qualification while omitting information materially qualifying that reliance.

29. Our finding is confined accordingly. We do not adjudicate perjury, criminal guilt or professional misconduct, and we impose no consequence upon a deponent who is not a respondent. We find only that the company's sworn assurance of authenticity and non concealment was materially false in the context of the qualification information it chose to present.

Finding on Charge E PROVED against the Respondent to the limited extent stated in paragraphs 27 to 29.

CHARGE F RULE 19 SUBSECTION 4

30. Rule 19(4) requires proof that the bidder before the procuring agency has itself been debarred by a foreign country, international organisation or foreign institution. The exclusion record in evidence names Metpath Laboratories Inc and another person. It does not name M/s Inner Imaging Center (Private) Limited. Corporate association, investment or reliance on Metpath's financial material cannot rewrite the foreign order or extend it to a legal person it does not identify.

Finding on Charge F NOT PROVED. No independent debarment consequence arises under Rule 19(4).

FRAUDULENT PRACTICE

31. The proved facts meet the definition of fraudulent practice. The Respondent supplied or adopted material which, viewed as a whole, conveyed corporate experience, comparable institutional capacity, operational volume and financial strength that it did not possess or had not proved. The inaccuracies were capable of influencing qualification. Their number, their concentration in the principal scoring categories, the Respondent's knowledge of its own incorporation and legal relationships, and the absence of any contemporaneous correction exclude innocent misunderstanding as a reasonable explanation.

32. This conclusion does not depend upon the rejection of the revised proposal, the Board's prior treatment of the bid, the pendency of litigation, alleged loss to the public exchequer, or criticism of the Respondent's conduct outside the procurement record. It rests upon the signed qualification material, the official verification documents, and the Respondent's own explanations.

SANCTION AND PROPORTIONALITY

33. The purpose of blacklisting is protective. It preserves confidence that public bodies may rely upon the experience, capacity and declarations presented by bidders, particularly where the proposed assignment concerns clinical services and the operation of a major healthcare institution. The sanction must correspond to the procurement risk revealed by the proved conduct; it must not punish the Respondent for approaching the courts or for asserting a contractual position.

34. The aggravating features are substantial. The inaccuracies crossed several independent qualification heads; they concerned the Respondent's core eligibility rather than a collateral detail; they invoked foreign institutions and finances not shown to belong to the bidder; and they survived repeated requests for the documents necessary to verify the explanations offered. The potential consequence was the entrustment of a large public healthcare complex on a materially unreliable account of institutional and financial capability.

35. The Committee has also considered the matters operating in the Respondent's favour. It has not attributed a literal 500 bed ownership claim where the dossier does not contain it; it has excluded irrelevant bank transactions; it has confined the affidavit finding to the company's own assurance; it has rejected the foreign debarment charge; and it has declined to extend the order to individuals, associates, affiliates or successors. Even with those limitations, the remaining fraudulent practice is grave and sustained.

36. A warning or short exclusion would not adequately answer the risk. The maximum period of ten years is proportionate because the false or reckless representations were cumulative, went to the heart of qualification, and concerned a public healthcare undertaking in which inaccurate credentials could expose both public funds and patient welfare. The period is imposed under Rule 19(1)(a) and runs from the date of this Order.

FINAL ORDER

37. For the foregoing reasons, the Committee unanimously declares that M/s Inner Imaging Center (Private) Limited engaged in fraudulent practice in the 2023 pre qualification process for the Cantonment Healthcare Complex.

38. The Respondent is blacklisted and debarred from participation in procurement proceedings conducted by Lahore Cantonment Board for a period of ten years commencing on 4 September 2026 and expiring at the close of 3 September 2036, subject to any review, suspension or order passed by the Public Procurement Regulatory Authority or a court of competent jurisdiction.

39. No order is made against Mr Ata Chaudhary, Dr Sadia Chaudhary, United Management Associates, or any other director, promoter, officer, affiliate, successor or related concern. Any future action against another person or entity shall require independent jurisdiction, notice, evidence and determination in accordance with law.

40. Charge F under Rule 19(4) is dismissed. The exclusion of Metpath Laboratories Inc shall not be entered, published or described as a foreign debarment of M/s Inner Imaging Center (Private) Limited.

41. The Member and Secretary shall forthwith serve an authenticated copy of this Order upon the Respondent at its registered office and through counsel; enter the modes and dates of service in the service register; transmit the Order and prescribed record to the Public Procurement Regulatory Authority for publication and such cross debarment action as the Authority may lawfully take; and place the Order before Lahore Cantonment Board and the competent ML&C authority for information.

42. The constitution notification, show cause record, evidence register, service record, applications, interim orders, hearing minutes and this signed Order shall be preserved together as the official record. Any right of review, representation, appeal or constitutional remedy available to the Respondent under the applicable regulations or general law remains unaffected.

ANNOUNCED AT LAHORE CANTONMENT ON 4 SEPTEMBER 2026

Mr Wajid Aziz Khan
Chairman

Mr Bilal Mazhar
Member and Secretary

Mr Muhammad Arsan Randhawa
Advocate
Member

Lt. Col. Yasir Ahsan
Member

Abdul Samad Khan
Member