**BEFORE THE SPECIAL JUDGE ANTI-TERRORISM COURT KARACHI**

Special Case No. 323/2018

The State

Versus

Anwar Ahmed & Others

**APPLICATION UNDER SECTION 21 OF ANTI-TERRORISM ACT, 1997**

It is most respectfully and most humbly submitted on behalf of the complainant that all the accused persons in this case are Ex-Police Officials and people of influence. That the main culprit accused Rao Anwar has a history of conducting Extra Judicial Murders and according to the Police Report, four hundred and forty four (444) people have been murdered in illegal encounters in the District of Malir, during the tenure of accused Rao Anwar. That in light of this fact, the Honourable Supreme Court, after taking Suo Moto notice of the alleged encounter of Naqeebullah Masood, ordered/directed IGP Sindh on 01.02.2018, to provide full protection to the witnesses and the complainant in this matter. In view of the above, it is most respectfully submitted that this Honourable Court may be pleased to direct Inspector General Police, Sindh, and Ranger Authorities (Director General of Rangers) to provide the necessary protection to the witnesses and the counsel of complainant on the following facts and grounds:

1. That the witnesses and the counsel of complainant are under very serious threat due to their appearance in the above matter and due to the law and order situation in the country, as well as the influence of the accused persons involved in the above heinous offense, it is difficult for the witnesses to appear in the matter. Therefore, there is a serious apprehension of the retraction of the witnesses if the necessary protection is not provided to them.

*A copy of Summary of Police Encounter Cases of District Malir annexed and marked as* **Annex ‘A’**.

1. That the Honourable Supreme Court, realizing the nature of this case and the influence of the accused persons, also ordered and directed IGP Sindh to provide full protection to the witnesses and the complainant in this matter, on 01.02.2018.

*A copy of Honourable Supreme Court Order dated: 01.02.2018, annexed and marked as* **Annex ‘B’**.

1. That all the accused persons are Ex-Police Officials and people of resources. Hence, it will not be difficult for them to threaten the witnesses and force them to withdraw from testifying and as already noticed, the witness Shahzada Jehangir, retracted his earlier statement through an affidavit filed in this Honourable Court on 10.05.2018, because of the threat to his life. It is only logical to presume that the witness has been pressurized by the accused Rao Anwar, his companions and other co-accused person to retract his statement. Therefore, in order to prevent further witnesses from withdrawing it is of paramount importance that the necessary protection is provided to the witnesses.

*A copy of Shahzada Jehangir affidavit dated: 10.05.2018, annexed and marked as* **Annex ‘C’**.

In view of the above it is most respectfully and most humbly prayed that this Honourable Court may be pleased to direct IGP Sindh and Director General Rangers to provide necessary protection to the witnesses, the complainant and the counsel of complainant.

Advocate for Complainant

Karachi,

Dated: \_\_\_\_\_\_ May, 2018