

### LABBAIK (pvt)Ltd.

04-02-2021

The SHO Ibrahim Haideri Police Station Karachi

Sub: Complaint to Register an FIR against Mr. Saleem Baig & Others under Pakistan Penal Code and other enabling laws

This is an official complaint and request for investigation on behalf of M/s Labbaik (Pvt) Ltd (hereinafter referred to as the "Complainant"), filed through its authorized representative Azhar Shamim son of Zafar Ahsan (hereinafter referred to as the "authorized agent") against Mr. Saleem Baig, Muhammad Farooq, Muhammad Ikram Barkar, Mr. Sheeraz Asghar, Mr. Asim, Mr. Amin Bhatti, Mr. Mazhar Chauhan and others on the following fact and grounds:

- M/s Labbaik (Pvt) Ltd (the Complainant") is a private limited entity registered with the Securities & Exchange Commission of Pakistan under the laws of the Islamic Republic of Pakistan and involved in the business of Satellite Television and Broadcasting. The Complainant is duly licensed to operate satellite TV channels under the names of "BOL News" and "BOL Entertainment".
- That Mr. Saleem Baig is working as Chairman Pakistan Electronic Media Regulatory Authority [PEMRA] and other proposed accused are also working in the same Authority at different posts.
  - That it is submitted the Complainant filed Writ Petitions before the Honorable Peshawar High Court challenging the appointment of Mr. Saleem Baig as Chairman PEMRA and other officials of the Authority on the ground that the said appointments are in violation of laws, rules and orders of the Honorable Supreme Court of Pakistan as well as Honorable High Court. However, after filing the above writ petitions, Mr. Saleem Baig and other officials of the Authority started coercive and unlawful drive against the Complainant and passed many unlawful decisions/orders against the Complainant which were assailed by the Complainant before the Honorable High Courts. It is pertinent to mention here that the Honorable Peshawar High Court in Writ Petition No.3937-P/2020 was pleased to pass an interim order dated 16-09-2020, whereby the Authority therein were restrained from taking any adverse action against the Complainant. The said interim order continues to operate till date.



3.

بول

BOL Headquarters: Bolistan, BOL Road, Creek Cantonment Karachi. Islamabad Office: Plot # 26, Civic Center, G-6 Markaz, Islamabad Lahore Office: 72, FCC, Service Canal Road, Gulberg IV, Lahore UAN: 0213 717 0265 • http://www.bolnetwork.com

facebook.com/bolnetwork twitter.com/bolnetwork youtube.com/bolnetworkofficial



# LABBAIK (pvt)Ltd.

- 4. However, on 03-02-2021, the Complainant has come into the knowledge that Mr. Saleem Baig has issued-illegal, unlawful and unjustified direction to the Cable operators through his regional heads and other official including proposed accused that to shut down the BOL TVs broadcast or shift the BOL channels to the last number.
- 5. The said act of the proposed accused is to an act of disobeying the law with intend to cause injury to the Complainant, thus liable to be punished under section 166 of the Pakistan Penal Code. The said act of the proposed accused also falls under Criminal Intimidation, hence the proposed accused are also liable to be punished under section 506 & 507 of Pakistan Penal Code.

In view of the above, you are requested to please register a FIR against Mr. Saleem Baig and others proposed accused under section 166, 503, 506 & 507, Pakistan Penal Code Pakistan Penal Code as well as all enabling laws which applicable under the given circumstances.

Truly,

Azhar Shamim

Manager (3)

The Following documents are attached:

- i. Incorporation Certificate
- ii. Board Resolution
- iii. Transcription of illegal and unlawful directions
- iv. Details of proposed accused





## EXTRACT OF RESOLUTION PASSED BY THE BOARD OF DIRECTORS OF M/S LABBAIK (PVT) LTD IN THE MEETING HELD ON 03.02.2021

Extract from the minutes of the meetings of the Board of Directors of M/s Labbaik (Pvt) Ltd duly convened at which a proper Quorum was present, held on 03-02-2020 at the registered office of the company at BOL Headquaters, Bolistan Road, Korangi Creek Cantonment, Karahci.

Resolved that Mr. Azhar Shamim son of Zafar Ahsan holding CNIC No. 42101-8463762-7 is hereby authorized to take legal action against the accused persons namely Mr. Saleem Baig, Muhammad Farooq, Muhammad Ikran Barkar, Sheeraz Asghar, Mr. Asim, Amin Bhatti and Mazhar Chohan.

Resolved that Mr. Azhar Shamim son of Zafar Ahsan is further authorized to file Complaint(s) for the registration of FIR against the above person, produce all documents and evidences before the police officials and Honorable Courts as and when required, record his statement(s) before the officials and evidence before the Honorable Court(s), sign all complaint, applications, and other pleading or document in respect to the above matter, on behalf of the Company if required, engage lawyer(s)/Counsel(s) in this matter, file application, appeal, revision, review, Petition and to take all steps as may be necessary for the safeguarding the interest of Company.

The resolution was passed unanimously.

**Certified True Copy** 

M/s Labbaik (Pvt) Ltd

Company Secretary



BOL Headquarters: Bolistan, BOL Road, Creek Cantonment Karachi. Islamabad Office: Plot # 26, Civic Center, G-6 Markaz, Islamabad Lahore Office: 72, FCC, Service Canal Road, Gulberg IV, Lahore UAN: 0213 717 0265 • http://www.bolnetwork.com

facebook.com/bolnetwork twitter.com/bolnetwork youtube.com/bolnetworkofficial

### **DETAILS OF PROPOSED ACCUSED**

- Mr. Saleem Baig
   The Chairman
   Pakistan Electronic Media Regulatory Authority
   Headquarters 3<sup>rd</sup> Floor,
   Mauve Area, G-8/1,
   Islamabad
- Muhammad Farooq
   Director General Distributions
   Pakistan Electronic Media Regulatory Authority
   Headquarters 3<sup>rd</sup> Floor,
   Mauve Area, G-8/1,
   Islamabad
- Muhammad Ikram Barkar
   Regional General Manager Lahore
   Pakistan Electronic Media Regulatory Authority
   Having office at 80/80-A, Bridge Colony,
   Abid Majeed Road,
   Lahore
- Sheeraz Asghar
   Regional General Manager Karachi
   Pakistan Electronic Media Regulatory Authority
   Having office at D-71, Block 7,
   Kh-e-Roomi, Clifton
   Karachi
- Mr. Asim
   Assistant General Manager Karachi
   Pakistan Electronic Media Regulatory Authority
   Having office at D-71, Block 7,
   Kh-e-Roomi, Clifton
   Karachi
- Amin Bhatti
   Inspector Lahore
   Pakistan Electronic Media Regulatory Authority
   Having office at 80/80-A, Bridge Colony,
   Abid Majeed Road,

#### Lahore

7. Mazhar Chauhan
Inspector Lahore
Pakistan Electronic Media Regulatory Authority
Having office at 80/80-A, Bridge Colony,
Abid Majeed Road,
Lahore

فريق 1: السلام عليكم

فريق 2: (BEEP) كيا حال بين؟ (BEEP) بات كرربا بون (BEEP) پيمرا.

فریق 1:جی جی سر! کیسے ہیں ٹھیک ہیں؟

فریق 2: بس ٹھیک ٹاک ایک آرڈر آیا ہے فوری اس کو IMPLEMENT کرنا ہے۔ میری بات غور سے سنو۔بول نیوز کو ابھی فوری بند کردو یا آخری نمبروں پر لگادو۔

فریق 1: سر آپ کو پتم اہمی ہول کا بڑا PEAK TIME چل رہا ہے سر وہ عوام کی آواز.

فریق 2: او PEAK TIME کو چہوڑو بہت پریشر ہے،چیئرمین سلیۃ بیگ صاحب کی طرف سے بہت پریشر ہے اس کو فوری جو ہے بند کرو یا آخری تعبروں پہ لگاؤ اس کو۔ اس کا مجھے فوری FEEDBACK دو۔

فریق 1: **چلیں سر میں آپ کو کردیتا ہوں اس کو پچھلے نمبر**وں پہ جہاں **ابهی دیکھتے** بیں

فریق 2: (BEEP) فوری ابهی ابهی کرنا ہے اور مجھے بتانا ہے،میں انتظار کررہا ہوں تمہارے اس کا STATUS کا ورنہ میں ٹیم بھیجوں گا اور اس کو CROSS CHECK کراؤں گا

عریق 1: سر میں کردیتا ہوں، سر آج ہی ہوجاتا ہے

فریق 2: بس جلدی مجهـئے FEEDBACK دیں اس کا

ئریق 1: **ٹھیک ہے** 

ئرىق 2: ا**وكى**