

# IN THE HIGH COURT OF SINDH AT KARACHI

(Constitutional Jurisdiction)

## Constitutional Petition No. D- 2912 of 2014

1. **Naeem Sadiq**  
son of Muhammad Sadiq Malik,  
Muslim, Adult, resident of  
F-15/2, 4<sup>th</sup> Gizri Street, DHA,  
Karachi.
2. **Nazim F. Haji**  
son of Fida Hussain Haji,  
Muslim, Adult, resident of  
A-21/ 2 A, K.D.A. 1 - A Extension,  
Stadium Road, Karachi.
3. **Riyaz Towfiq Chinoy**  
son of Towfiq Habib Chinoy,  
Muslim, Adult, resident of  
House No. 11-A1/1,  
Circular Avenue, Phase 2,  
DHA, Karachi.
4. **Farhana Mowjee Khan**  
wife of Irfan Khan,  
Muslim, Adult, resident of  
E-18, 4<sup>th</sup> Gizri Street,  
Phase 4, D.H.A., Karachi.
5. **Aasia Hussain**  
wife of Syed Nayyer Shahid Hussain,  
Muslim, Adult, resident of  
House No.12/1, 8<sup>th</sup> Zamzama Street,  
Clifton, Karachi.
6. **Dr. Abid Jamal**  
son of Jamaluddin Qureshi,  
Muslim, Adult, resident of House No. 78/I,  
off 3rd Street, Khayaban-e-Sehar,  
Phase 6, DHA,  
Karachi.
7. **Nighat Mir**  
wife of Imran Mir Azam Ali,  
Muslim, Adult, resident of  
House No. 12-A, West Avenue,  
Phase 1, DHA,  
Karachi.
8. **Adnan Asdar Ali**  
son of Asdar Ali,  
Muslim, Adult, resident of  
D-40/1, Block-3, Clifton,  
Karachi.
9. **Mahboob Khan**  
wife of Adnan Asdar Ali,  
Muslim, Adult, resident of

D-40/1, Block-3, Clifton,  
Karachi.

- 10. Dr. Jahanzeb Effendi**  
son of \_\_\_\_\_,  
Muslim, Adult, resident of  
50/1, 21<sup>st</sup> Street, Khyban-E-Mujahid,  
Phase 5, D.H.A., Karachi.
- 11. Yasir Ali Quraishi**  
son of Abdul Naeem Quraishi,  
Muslim, Adult, resident of  
Prime House, C 2, Block -9,  
Clifton, Karachi.
- 12. Shahnaz Shahid Hamid**  
wife of Malik Shahid Hamid,  
Muslim, Adult, resident of  
Plot No.95, Khayaban-e-Roomi,  
Phase 8, DHA,  
Karachi.
- 13. Syed Yawar Abbas Jilani**  
son of Syed Saleem Abbas Jilani,  
Muslim, Adult, resident of  
39-B, Circular Street,  
Phase 2, DHA,  
Karachi.
- 14. Roland DeSouza**  
son of Joseph Manuel DeSouza,  
Christian, Adult, resident of  
285, Garden East,  
Karachi.
- 15. Lorna Mary Gomes**  
wife of Tiburtius I. Gomes,  
Christian, Adult, resident of  
House No.566, Catholic Colony No.2,  
Wedderburn Road,  
Karachi.

...Petitioners

**Versus**

- 1. Province of Sindh,**  
Through the Chief Secretary,  
Sindh Secretariat,  
Karachi.
- 2. Ministry of Excise & Taxation,**  
Through Secretary Excise & Taxation,  
Sindh Secretariat,  
Karachi.
- 3. Ministry of Home Affairs,**  
Through Secretary Home Department,  
Sindh Governors Secretariat,  
Karachi.

4. **Inspector General Police,**  
Police Headquarters,  
I.I. Chundrigar Road,  
Karachi.

...Respondents

**CONSTITUTIONAL PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973**

The Petitioners above named, respectfully submit as follows:

1. That, the Petitioners are law abiding, well respected and honest taxpaying citizens of Pakistan; residing in the city of Karachi. The Petitioners have all either directly or indirectly, been personal victims to the heinous crimes perpetrated in the city every day. The Petitioners in their own personal capacity are contributing time, effort and money in making a positive difference to the society and are continuously striving hard to make Karachi a safe place for the common citizens, where only rule of law should persist. After, liaising with various Government authorities and seeing no positive outcome, the Petitioners are deeply grieved and concerned about the deteriorating law and order situation in the city of Karachi and of the whole province of Sindh in general, and have been left with no other alternate but to move this Public Interest Petition in this Hon'ble Court, in order to improve and ensure the enforcement of laws by the Respondents.
2. The Petitioners being concerned about the prevailing and persistent failure of the executive authorities i.e. the Respondents to curb the acts of crime and terror, have also formed a trust, by the name of 'Citizens Trust Against Crime' (CTAC) which is dedicated to reduction of crime and violence. The CTAC aims to reduce the crime and violence by actively supporting the government institutions in the areas of capacity development, planning, technology, and expertise. The Petitioners have done extensive research at their own expense and have identified various

factors which aid/ help in the abetment of crime and terror, and have found some simple solutions to curb the same if only the Provincial Government is sincere and has the will to do so.

3. That, the present petition is being filed with a particular focus on the unregistered private, government and police vehicles as well as vehicles carrying fake, duplicate, personalized or foreign number/ registration plates, which are used in serious Crimes and Acts of Terror; and the lack of Police capacity to do anything about it.
4. That a recent survey conducted by CTAC has revealed that Motor Vehicles are an integral component of most crimes in the city. It is pertinent to state that the streets of Karachi are infected with vehicles that carry fake, personalized, applied for registration (AFR), or foreign looking number plates and there is total apathy and neglect on part of the Police and the Provincial Government to do anything about it. The survey particularly revealed that hundreds of private vehicles were imposing (impersonating) as government vehicles by simply using either fake government number plates or illegally displaying their private registration numbers on green background plates. It has also been found that the vehicles of this category are also the ones which are often employed in crimes, terrorism, smuggling, and kidnapping, as they often leave behind no clues of their origin or ownership – a phenomenon well observed in many recent crimes.
5. That, the Petitioners through CTAC have also worked along with CPLC and Sindh Police/ Traffic Police to launch an ongoing zero tolerance program for enforcement of laws related to vehicles on roads in the month of October 2013. All vehicles regardless of the status or rank of their owners and regardless of their category, personal, private, official, commercial, government, police, parliamentarians, ministers, judges etc.

were included in this law enforcement program. However, a surprising fact came to the notice of the Petitioners, that many government vehicles were not registered, used self-styled number plates, and/or were not using number plates at all.

**TRUE COPIES OF THE NEWSPAPER ARTICLE DATED 22.10.2013 AND LETTER DATED NIL TO CHIEF SECRETARY SINDH, ARE ANNEXED HERETO AND MARKED 'A' & 'A-1', RESPECTIVELY.**

6. That, it was also observed that some **4000 to 6000** vehicles being used by various departments of the Sindh Government including the Police are not registered with the Excise & Taxation (E&T) Department of the Government of Sindh. These unlawful officials/ vehicles pay no taxes, use self-styled number plates and some of them have been found involved in crime and violence.
  
7. It is worthy of mention that the E&T Department of the Government of Sindh has developed an online vehicle verification website (<http://excise.gos.pk/onlineVerification/verification.php>) on which every motor car / motor cycle belonging to the private citizens can be verified and the basic information on the vehicle can be checked, including whether tax payments are up to date or not. However, the said website fails to display the registration data of government and police vehicles on its website, whereas the details of almost all private vehicles can be easily accessed by anyone, by entering registration number of the vehicle.

**TRUE COPY OF THE NEWSPAPER ARTICLE DATED 21.01.2014, IS ANNEXED HERETO AND MARKED 'B'.**

8. That, it is submitted that the discrepancies, such as mentioned herein above, show that the data contained in E&T Department's motor registration database is not accurate and reliable. The data does not include complete information on the vehicles owned by provincial government

and its various departments including the police, which allow the criminals and terrorists to use such flaws in the system; thus enabling them to use a government type number plate on their vehicles to propagate crime and terrorism in the city.

9. That, it is further submitted that due to security threats the Sindh Government usually issues “cover number plates” for its government vehicles, which are like private number plates and are aimed to disguise the government vehicles. More than a thousand such cover number plates have been issued which are prone to criminal confusion and misuse. It is a ridiculous practice of first issuing distinctive government number plates and then issuing hundreds of cover number plates to disguise the identity of the original plates. It is submitted that a better way to manage security and anonymity is to make all private, government, and police vehicles to carry standardized number plates that are identical for all citizens and all government departments and there is no distinction between the government number plates and private number plates. Such measure will not only reduce the chances of misuse of the government number plates, but also ensure the security of the government vehicles as the government vehicles would not be easily identifiable by criminals. The numbering system adopted by E&T department is non-standard and irrational. It violates the universal concept of unique numbering system for every vehicle and lends itself to misuse by criminals. As an example, ‘GS 0002’ has been issued to 4 different towns of Sindh – Shikarpur, Mirpur Khas, Jacobabad and Shikarpur. The same has been done with hundreds of other numbers such as GS 0004, GS 0236, GS 0266, GS 0307, GS 6560 etc.
10. That, many other examples of fake / duplicate impersonating, private, foreign number plates which the Petitioners have observed at various

places within a span of two weeks and have taken photographs of the same, which surprisingly the law enforcers/police are not able to detect with all their training, are attached and annexed herewith. That from the survey the CTAC has identified seven (7) different categories of number plate violations which are instrumental in perpetuating serious crime and terrorism in the city.

11. That, the first category includes the vehicles carrying purported government number plates, the record of which is not available with the E&T or any other Government Department. It is submitted that in case if such vehicles are involved in the crimes, then there will be no way to identify the owner or the user of such vehicles.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'C'.**

12. That, the second category includes the vehicles which carry the government number plates that had previously been allotted to other vehicles, which is also against the law. The vehicles used by such individuals falsely use government number plates on private vehicles. They can indulge in any crime but would not be checked by the Police as they are using government number plates, hence they can easily remain undetected.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'D'.**

13. That, the third category includes the vehicles carrying private registration plates impersonating the government number plates due to their 'green' background, hence pretending to be government vehicles.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'E'.**

14. That, the fourth such category includes the vehicles using unlawful personalized number plates, which are not registered/ recorded with the E&T Department. Some photographs of such vehicles are annexed hereto.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'F'.**

15. That, the fifth category of vehicles include the plaques or plates which either completely or partially cover the number plates, hence making it impossible to identify such vehicles in case if they are involved in crimes.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'G'.**

16. That, the sixth category includes the vehicles that carry illegal number plates, which are in the format that is not used in Pakistan. Most of the times such number plates are completely forged, hence making them unidentifiable in cases of their involvement in crimes.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'H'.**

17. That, the seventh category includes the vehicles which are unregistered and carry the number plates using 'Applied for Registration' and 'AFR' to pretend as if they will get their registered number plates very soon. However, it leaves such individuals at liberty to commit crimes and remain undetected.

**PHOTOGRAPHS ARE ANNEXED HERETO AND MARKED 'I'.**

18. That, it is respectfully submitted that if an ordinary citizen like the Petitioners, can identify in their normal routine, hundreds of such vehicles plying on the roads with full impunity, then why are those who are responsible to curb this crime and are duty bound to enforce the laws, not able to identify and eliminate such vehicles? It is absolutely incomprehensible and baffling that the Traffic Police and other Law Enforcers who are regularly seen on the roads cannot notice, see, observe

and stop such conspicuous vehicles. If the Respondents cannot see and detect such suspicious vehicles roaming freely all over the city then either they are absolutely inefficient or are complicit, both of which is a dangerous situation which needs to be taken cognizance of by this Hon'ble Court.

19. That, it may be mentioned that the **Most Important Persons** of any country are its Citizens i.e. the common man, the private citizen. These are people who pay taxes and have a stake in the country. It is a known fact that the bulk of the police force is highly politicized and involved in the protection of all others except for these Most Important Persons (“**MIPs**”). That it is an important factor in deteriorating law and order situation that the majority of police force is being used for the protection of the so called VIPs and VVIPs round the clock, hence depriving the common citizens such as the Petitioners and others from their fundamental rights guaranteed under Articles 4, 9, 24 and 25 of the Constitution of Pakistan, 1973. It is submitted that the lives of the Members of Parliament, Ministers, and other so called VIPs etc. are no more valuable as compared to that of the common citizens who are the Most Important Persons for the Country. Hence it is the foremost and fundamental duty of the State and the Province to protect the lives of all citizens equally. The Respondents are duty bound to deploy the police force for the protection of the common citizens instead of only protecting the so called VIPs. If there is a scarcity of police personnel, then they should first be deployed to protect the common citizens and then if any extra force or capacity is available, they should be used for other purposes. Therefore, it is the need of the day that the Respondents are compelled to focus primarily on deploying the police and security forces for the purpose of protecting the lives and properties of the common citizens, who are the Most Important People of Pakistan. The

police should make public the number of police/security men deployed for the purpose of VIP duties along with the names of the so called VIPs.

20. That, the Petitioners have sent written requests under the Sindh Freedom of Information Act, 2006, to several government officials for further information and records with regard to the total number of vehicles held by the government officials, category of registration, number of vehicles unregistered, government vehicles in unauthorized use of the politicians and retired government officers etc., in order to conduct research into how lawlessness in vehicle management impacts on crime and militancy; however, no reply has been received to date. It is the fundamental right of the Petitioners to have access to the public information such as the one requested in the annexed letters, therefore, the Respondents by not replying to the letters of the Petitioners are violating the fundamental right of the Petitioners as enshrined in the Article 19A of the Constitution of Pakistan, 1973.

**TRUE COPY OF THE LETTER DATED 30.11.2013 IS  
ANNEXED HERETO AND MARKED FROM 'J'.**

21. That, the Petitioners have also sent a written request to the Inspector General of Police, Sindh under the Sindh Freedom of Information Act, 2006, for information on the total number of police officers / police vehicles deployed for security of the people considered more important than the private citizens and the names of all such very important persons. Needless, to say that the information has not been provided. It is the fundamental right of the Petitioners to have access to the information such as the one requested and the Respondents should be compelled to provide the information.
22. That, unless responsibility for detecting such vehicles and verifying the authenticity of its registration against an online verification of government

and police vehicles, is given to a particular department of the Police Force, crime and terrorism would continue unabated in the city. The Petitioners as law abiding and socially contributing citizens have also offered their honorary services to the Respondents to help them streamline the registration, develop an online verification system and train the personnel to detect such unlawfully registered vehicles, but the Respondents do not even seem to have the will or intention to improve the system.

**TRUE COPY OF THE LETTER DATED 02.12.2013 IS  
ANNEXED HERETO AND MARKED FROM 'K'.**

23. That it is submitted that the issues raised in the present petition are of grave public importance and need this Hon'ble Court's indulgence to arrest the deteriorating law & order and for the enforcement of the writ of law. The Petitioners along with other citizens of Karachi in particular and of the province of Sindh in general have been suffering at the hands of the Respondents, who have been willfully negligent and reckless in the performance of their duties obligated upon them by law and the Constitution of Pakistan, 1973. The fundamental rights of Petitioners along with other citizens are being violated; in particular there are violations of the Articles 4, 8, 9, 19A, 24, 25 of the Constitution of Pakistan, 1973.
24. That, in light of the above-stated facts and circumstances, the Petitioners have no alternate and efficacious remedy except to invoke the constitutional jurisdiction of this Honourable Court on, inter alia, the following grounds:

**GROUND S**

- a) That, large number of government and police owned vehicles are not being registered by the E&T Department in violation of the sections 23 and 90 of the Provincial Motor Vehicles Ordinance, 1965.
- b) That, such unregistered government and police vehicles are used as a tool for committing crimes, and the criminals go undetected by the police, which increases the rate of acts of crime and terror depriving the common citizens including the Petitioners of their fundamental right guaranteed under Article 9 of the Constitution of Pakistan, 1973.
- c) That, the duplication of the government number plates and the fake government plates, is being used by the criminals to commit crimes and acts of terror without being detected by the police. The main reason of which is the persistent failure of Respondents to implement the Provincial Motor Vehicles Ordinance, 1965 in strict sense.
- d) That, no accurate details of government number plates are available with the E&T Department. Hence, creating unimaginable possibilities for the criminals to use such loophole to commit crimes and acts of terror. The manipulation of the registration details of the government vehicles and duplication of the government number plates can be curbed by making the details of the government vehicles available on the E&T Department's website in the similar manner as the details of private vehicles are available.
- e) That, the issuance of distinctive government number plates allows for the criminals to use the green color on their private number plates in order to pose as government officials/vehicles to remain undetected or to gain access to sensitive locations. Such practice of issuing distinctive (green) government number plates should be discontinued forthwith and the

government vehicles should be registered and issued the number plates similar to the private vehicles.

- f) That, there is a need to discontinue and eliminate all types of distinctive government number plates and use the same type, colour, font, size and standardized number plate for ALL vehicles in the province. This will prevent the criminals from using the green color on their private number plates in order to pose as government officials/vehicles to remain undetected. The similarity of number plates will also act as an additional security measure for government officials. However, as practiced elsewhere in the developed countries, the words “For Official Use Only” can be written on all government/official vehicles keeping the rest of the number plate identical to the private number plates, which will make them easier to be identified in case such vehicles are being used for other than official purposes. While implementing these steps it must be taken into account that the new standardized number plates meet the requirements of ANPR (Automatic Number Plate recognition), so as to make them camera readable.

**PHOTOGRAPH OF A US GOVERNMENT VEHICLE NUMBER  
PLATE IS ANNEXED HERETO AND MARKED FROM ‘L’.**

- g) That, the authority and responsibility needs to be given to a particular department in the Police to be solely accountable and responsible for ensuring, checking, verifying and enforcing issues related to vehicle registration, impounding of unlawful vehicles, taking penal action when necessary and to seek assistance/cooperation of any institution/body of citizens who have expertise in this field. Such department must have the exclusive responsibility to take all actions against unlawful vehicles and number plates to ensure that such vehicles do not ply on the road. The nominated officials of this department must also have the capacity to

electronically verify the data of a vehicle, from an office, check post or a moving patrol vehicle.

- h) That, it is a settled law that all statutes are to be applied fairly and justly and in consonance with the Constitution of Pakistan, 1973. The Respondents have not been taking any steps to register the unregistered government vehicles and to curb the crime of misusing the green colour number plates and/or duplication of the government number plates; hence the fundamental rights of the Petitioners and other citizens in general are being violated.
- i) That, the deployment of unlimited number of police and security personnel for the so called VIPs and other higher ups at the expense of the common citizen, is illegal, unlawful, and ultra vires the Article 25 of the Constitution of Pakistan, 1973, which guarantees the equal protection of law to all citizens irrespective of their rank, caste, creed etc.
- j) That, it is respectfully submitted that this Hon'ble Court has jurisdiction because the cause of action has arisen within the jurisdiction of this Hon'ble Court and the Respondents have their residents, families and their registered offices within the jurisdiction of this Hon'ble Court.
- k) That, no other petition has been filed by the Petitioners in this regard.
- l) That, there is no alternate and/or efficacious remedy available to the Petitioner, except to invoke the Constitutional Jurisdiction of this Hon'ble Court under Article 199 of the Constitution of Pakistan, 1973.

## **P R A Y E R**

It is therefore, most respectfully prayed that this Honourable Court may graciously be pleased to:

- (i) Direct the Respondents to forthwith register all Government and Police owned vehicles;
- (ii) Direct the Respondents to maintain comprehensive, complete, and accurate record of the all the government vehicles in the use of government departments including police etc., and display the same on E&T Department's website (department wise) for public view, transparency, verification and control;
- (iii) Direct the Respondents to ensure that all new vehicles including the government & police vehicles are registered, before being brought on the road;
- (iv) Direct the Respondents to take firm and on-going action against the violators, and persons driving non-registered vehicles, and persons driving vehicles using fake, fabricated, duplicate, manipulated, foreign or personalized number plates and/or vehicles bearing AFR (applied for registration) plates;
- (v) Direct the Respondents to ensure a unique number for every vehicle in the province and eliminate all cases of duplication in which the same number has been issued to government or private vehicles in different districts of province;

- (vi) Direct the Respondents to discontinue and eliminate the concept of cover numbers and such number plates if at all required may be limited only to intelligence / secret services, all other cover number plates be withdrawn and removed from use of all individuals;
- (vii) Direct the respondents to discontinue and eliminate all types of distinctive government number plates and use the same type, colour, font, size and standardized number plate for ALL vehicles in the province, and that the Respondents must ensure that the new standardized number plates meet the requirements of ANPR (Automatic Number Plate recognition), so as to make them camera readable;
- (viii) Direct the Respondents to give authority and make responsible a particular department in the Police to solely be accountable and responsible for ensuring, checking, verifying and enforcing issues related to vehicle registration, impounding of unlawful vehicles, taking penal action when necessary and to seek assistance/ cooperation of any institution/ body of citizens who have expertise in this field and to ensure that the nominated officials of such department must also have the capacity to electronically verify the data of a vehicle, from an office, check post or a moving petrol vehicle;
- (ix) Direct the Respondents to bring on record the details with regards to the number of police and other security personnel deployed on the security/protection of the VIPs with break-up details and the names of all such beneficiaries using the police security & police vehicle, including members of the Assembly, Ministers, high officials of the government, notable citizens etc., and to provide the information to the Petitioners as requested vide letter dated 30.11.2013 (Annexure J herein);

- (x) Direct the Respondents to furnish the department wise information and details requested by the Petitioners under the Sindh Freedom of Information Act, 2006, with regard to the total number of vehicles held by the government officials, category of registration, number of official government vehicles in use of the politicians and retired government officers etc.;
- (xi) Grant any other relief which may be deemed appropriate by this Hon'ble Court in the circumstances of the case;
- (xii) Grant Costs of this Petition.

**PETITIONERS**

**ADVOCATE FOR THE PETITIONERS**

**Karachi,**  
**Dated: May, 2014**

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**EXHIBIT C : FAKE GOVERNMENT NUMBER PLATES - RECORD DOES NOT EXIST**



**EXHIBIT C : FAKE GOVERNMENT NUMBER PLATES - RECORD DOES NOT EXIST**



**EXHIBIT C : FAKE GOVERNMENT NUMBER PLATES - RECORD DOES NOT EXIST**



**EXHIBIT D: FAKE GOVERNMENT NUMBER PLATES ORIGINALLY ISSUED TO A DIFFERENT VEHICLE**



Registered in 1992 as Suzuki Swift



Registered in 1998 as Toyota Corolla

**EXHIBIT D: FAKE GOVERNMENT NUMBER PLATES ORIGINALLY ISSUED TO A DIFFERENT VEHICLE**



**Registered in 1988 as Nissan Sunny**



**Registered in 1993 as Mitsubishi**

**EXHIBIT E: PRIVATE VEHICLES IMPERSONATING AS GOVERNMENT  
VEHICLES**



**EXHIBIT E: PRIVATE VEHICLES IMPERSONATING AS GOVERNMENT  
VEHICLES**



**EXHIBIT E: PRIVATE VEHICLES IMPERSONATING AS GOVERNMENT  
VEHICLES**



**EXHIBIT E: PRIVATE VEHICLES IMPERSONATING AS GOVERNMENT  
VEHICLES**



**EXHIBIT E: PRIVATE VEHICLES IMPERSONATING AS GOVERNMENT  
VEHICLES**



**EXH F:UNLAWFUL PERSONALIZED NUMBER PLATES**



**EXHIBIT F: UNLAWFUL PERSONALIZED NUMBER  
PLATES**



**EXHIBIT F: UNLAWFUL PERSONALIZED NUMBER  
PLATES**



**EXHIBIT F: UNLAWFUL PERSONALIZED NUMBER  
PLATES**



**EXHIBIT G: PLAQUES COVERING NUMBER PLATES OF THE VEHICLES**



**EXHIBIT H: ILLEGAL NUMBER PLATES**



**EXHIBIT H: ILLEGAL NUMBER PLATES**



**EXHIBIT H: ILLEGAL NUMBER PLATES**



**EXHIBIT I: ILLEGAL UNREGISTERED VEHICLES**

