BEFORE THE STATION HOUSE OFFICER (SHO) / DISTRICT POLICE OFFICER (DPO)

POLICE DEPARTMENT, DISTRICT SHEIKHUPURA / LAHORE, PUNJAB

Formal Application under Section 154 Cr.P.C. for Registration of Criminal Case / FIR

POLICE COMPLAINT REF: POL/ABM-EXT/2026/01
INCIDENT DATE: 03 – 04 September 2026
PPC OFFENCES: 342, 347, 348, 384, 386, 506 / 34 PPC
EXTORTED PROPERTY: Meezan Chq C-86770295 (Rs. 10M)
RECONCILED AUDIT: 100% Disbursed (39 Receipts)

COMPLAINANTS:
1. **MIAN MUHAMMAD USMAN** (Director / Authorized Representative, Fusion Developers / Asian International)
2. **MUHAMMAD SALEEM** (Pro-Bono Project Coordinator & Mediator)

NOMINATED ACCUSED PERSONS:
1. **SOHAIL GONDAL** (Managing Principal / Owner, Al-Barakah Marquee) — Cell: **0317-4195529**
2. **AKBAR GONDAL** (Associate / Co-conspirator) — Cell: **0340-3592837**
3. **HAFIZ ABDUL REHMAN** (Overseas Co-conspirator / Instigator) — Cell / WhatsApp: **+27 84 663 7272**
4. **MANAGER, AL-BARAKAH MARQUEE** (On-Site Accomplice) — Cell: **0300-1401053**
5. **3 to 4 Unidentified Armed Accomplices** present at Al-Barakah Marquee site, Sheikhupura.

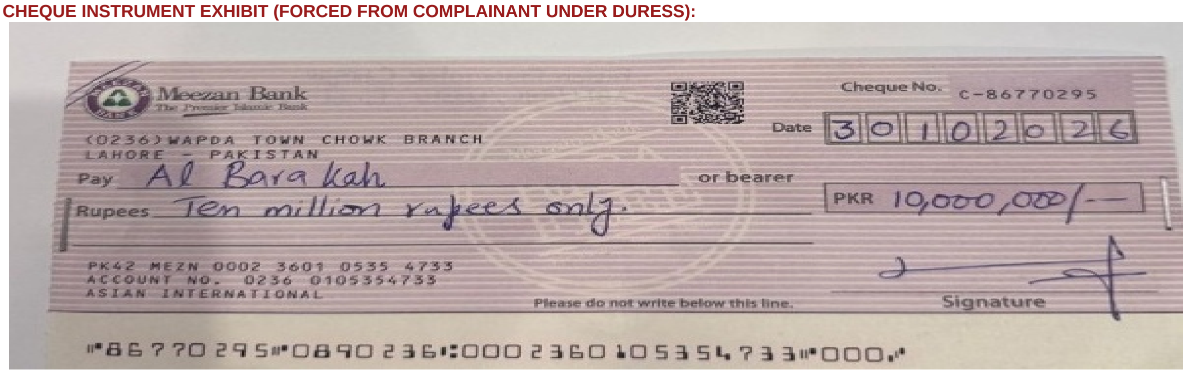
SUBJECT: FORMAL CRIMINAL COMPLAINT FOR REGISTRATION OF FIR UNDER SECTIONS 342, 347, 348, 384, 386, 506 AND 34 PPC FOR UNLAWFUL ABDUCTION, 24-HOUR ILLEGAL CONFINEMENT, CRIMINAL INTIMIDATION, AND FORCED EXTORTION OF A RS. 10,000,000.00 (TEN MILLION) SECURITY CHEQUE ALONG WITH COMPLETE FINANCIAL RECONCILIATION DOSSIER PROVING ZERO FINANCIAL DEFAULT.

CRIMINAL ACT	EXTORTED CHEQUE	CLIENT FUNDS RECONCILED	PENDING RECEIVABLES
24-Hr Illegal Confinement	**PKR 10,000,000.00**	**100% Disbursed (14.94M)**	**PKR 2,810,000.00**
Rescued by Police on distress call	Meezan Bank C-86770295 (30-Oct-26)	39 Verified Banking Vouchers Attached	Due from Al-Barakah to Fusion

1. Detailed Factual Statement of the Incident (3rd – 4th September 2026)

1. Premeditated Invitation to Site: On 03 September 2026, the Complainants (Mian Muhammad Usman and Muhammad Saleem) were invited by accused Sohail Gondal and Akbar Gondal to visit the Al-Barakah Marquee project site in Sheikhupura under the pretense of conducting a routine tripartite project review and finalizing technical coordination.
2. Abduction & 24-Hour Wrongful Confinement: Upon arrival at the marquee premises, the accused persons (Sohail Gondal, Akbar Gondal, the Marquee Manager, and 3-4 armed accomplices acting under the telephonic direction of Hafiz Abdul Rehman from South Africa) locked the entry gates, confiscated the Complainants' mobile communication, and subjected the Complainants to severe physical restraint and wrongful confinement for a continuous duration of **24 hours**.
3. Extortion under Coercion & Life Threats: During this illegal confinement, the accused falsely asserted that they would not allow the Complainants to leave alive unless a security cheque of **PKR 10,000,000.00 (Rupees Ten Million / One Crore Only)** was issued and unilateral agreements were executed under duress. Under severe fear of bodily harm and wrongful restraint, Complainant Mian Usman was forced to issue **Meezan Bank Cheque No. C-86770295 (Dated: 30-10-2026, Account Title: Asian International, Account No. 0236 0105354733) for PKR 10,000,000.00** and sign contractual instruments.
4. Timely Police Rescue Operation: As soon as an opportunity arose to transmit an emergency distress message, local police authorities were alerted. The police response team arrived swiftly and **rescued the Complainants from the unlawful confinement within 30 minutes of notification**.

EXTORTED CHEQUE INSTRUMENT EXHIBIT (FORCED FROM COMPLAINANT UNDER DURESS):



2. Complete Audited Accounts & Fund Utilization Statement (Proof of Zero Embezzlement)

To pre-empt and crush any false narrative by the accused claiming financial disputes or retained client advances, the Complainants hereby submit the complete, audited project financial statement proving that **100% of client funds were disbursed directly to third-party steel mills, cranes, and labour**:

• **Total Funds Received from Principal:** PKR 14,402,000.00 (144.02 Lakh) across 11 direct bank transfers.
• **Total Verified Third-Party Disbursements:** PKR 14,942,000.00 (149.42 Lakh) across 39 audited banking receipts.
• **Net Surplus Disbursed by Fusion:** Fusion Developers spent **PKR 540,000.00 more** on the marquee than received from the client.
• **Active Receivables Due to Fusion:** Al-Barakah Marquee owes **PKR 2,810,000.00** to Fusion Developers for auxiliary advances (furniture, cutlery, chandeliers) paid on Al-Barakah's behalf.

Expenditure Head / Category	Primary Beneficiaries & Proofs	Amount Disbursed (PKR)	Fund Source Status
1. Primary Steel Purchases (Ittefaq Steel & Bazar Al-Hadeed)	Direct Mill Invoices & Scale Weight Slips (18 Vouchers)	**Rs. 8,988,000.00**	100% Disbursed to Mills
2. SBW Engineering Labour & Site Wage Bailouts	17 Bank Transfers to Mazhar + Direct Labour Bailouts	**Rs. 2,782,728.00**	100% Disbursed to Labour
3. Banquet Furniture Advances & Fabrication	Chiniot & Gujranwala Furniture Vendors (2 Vouchers)	**Rs. 1,925,000.00**	100% Disbursed to Vendors
4. Solar System & Site Landscaping	Solar Plantations & Landscaping Nursery (3 Vouchers)	**Rs. 1,141,000.00**	100% Disbursed to Vendors
5. Fusion Technical Coordination & Supervision	Architectural Vetting, Travel Fuel & Site Admin (13 Vouchers)	**Rs. 182,300.00**	Actual Direct Expenses
TOTAL VERIFIED PROJECT EXPENDITURE	**39 Audited Banking Transactions & Receipts**	**PKR 14,942,000.00**	**Fully Disbursed (+Rs. 540k Surplus)**

3. Applicable Provisions of Law & Cognizable Offences

The acts of the accused persons constitute clear, aggravated cognizable criminal offences under the Pakistan Penal Code:

• **Section 342 PPC (Wrongful Confinement):** Detaining the Complainants against their will for 24 hours.
• **Section 347 & 348 PPC (Wrongful Confinement to Extort Property / Valuable Security):** Confining the Complainants specifically for the purpose of forcefully extorting a Rs. 10 Million cheque and signed instruments.
• **Section 384 & 386 PPC (Extortion by Putting Person in Fear of Death / Hurt):** Forcefully extracting valuable negotiable instruments through coercion, intimidation, and physical threats.
• **Section 506 PPC (Criminal Intimidation):** Threatening the Complainants with death and dire consequences.
• **Section 34 / 109 PPC (Common Intention & Abetment):** Joint pre-planned execution by all named accused on-site and abroad.

4. Formal Prayers / Legal Demands to Law Enforcement

In light of the foregoing facts, photographic evidence, and audited account records, it is respectfully prayed that:

1. **Registration of FIR:** A formal criminal case / First Information Report (FIR) be registered immediately against the nominated accused persons (Sohail Gondal, Akbar Gondal, Hafiz Abdul Rehman, Marquee Manager, and accomplices) under Sections 342, 347, 348, 384, 386, 506, and 34 PPC.
2. **Immediate Recovery & Seizure of Extorted Cheque:** Police authorities immediately recover, seize, and take into official case custody the extorted **Meezan Bank Cheque No. C-86770295 (Rs. 10,000,000.00)** and all documents signed under duress to prevent banking misuse or fraudulent encashment.
3. **Arrest of Accused & Life Security:** The accused persons be arrested and prosecuted strictly in accordance with law, and adequate security be provided to the Complainants against further harassment or retaliation.

5. Documentary Exhibits Attached with Complaint

ANNEXURE A: High-Resolution Color Scan of Extorted Meezan Bank Cheque No. C-86770295 (Rs. 10,000,000.00).
ANNEXURE B: Complete 39 Master Transaction Ledger & Banking Payment Receipts (PKR 14,942,000.00 Disbursed).
ANNEXURE C: Scale Weight Slips & Delivery Challans for 137.9 Tons of Structural Steel Delivered to Site.
ANNEXURE D: Itemized Schedule of Pending Receivables Due from Al-Barakah Marquee to Fusion (PKR 2,810,000.00).
ANNEXURE E: Digital Evidence Repository accessible live 24/7 at: https://albarakah-marquee.pages.dev and https://albarakah-vs-mazhar.pages.dev.

COMPLAINANT 1: ______________________________________ **MIAN MUHAMMAD USMAN** CNIC: _______________________ Director, Fusion Developers / Asian International Cell: _______________________ Date: **04 September 2026**	**COMPLAINANT 2:** ______________________________________ **MUHAMMAD SALEEM** CNIC: _______________________ Project Coordinator & Mediator Cell: _______________________ Date: **04 September 2026**
LEGAL COUNSEL / ADVOCATE: ______________________________________ **ADVOCATE HIGH COURT** Counsel for Complainants Lahore / Sheikhupura, Punjab Date: **04 September 2026**	**POLICE STATION RECEIVING OFFICER:** ______________________________________ **DUTY OFFICER / SHO** Police Station Concerned, Sheikhupura Diary / DD No.: _______________________ Date & Stamp: _______________________

VERIFICATION AFFIDAVIT: We, the above-named Complainants, do hereby solemnly declare and affirm on oath that the contents of paragraphs 1 to 5 above are true and correct to the best of our knowledge, belief, and documented banking records, and nothing has been concealed or misrepresented. Verified at Lahore/Sheikhupura on this 4th day of September 2026.