

COMPETITION COMMISSION OF PAKISTAN

ENQUIRY REPORT

(Under the provisions of Section 37(2) of the Competition Act, 2010)

**IN THE MATTER OF COMPLAINT FILED BY ATLAS HONDA
AGAINST M/S SHAFIQUE SONS, M/S PAK HERO INDUSTRIES
(PVT) LTD AND M/S UNITED MOTOR COMPANY FOR
DECEPTIVE MARKETING PRACTICES**

BY

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Dated: AUGUST 10, 2014

A. BACKGROUND

1. This report concludes the enquiry initiated by the Competition Commission of Pakistan (the “Commission”) under Section 37(2) of the Competition Act, 2010 (the “Act”) pursuant to a formal complaint filed with the Commission by Atlas Honda Ltd (hereinafter referred to as the “Complainant”) against three companies namely:
 - (i) M/s Shafique Sons (Respondent No. 1),
 - (ii) M/s Pak Hero Industries (Pvt) Ltd (Respondent No. 2) and
 - (iii) M/s United Motor Company (Respondent No. 3);

(hereinafter, collectively referred to as the “Respondents”).

2. The complainant alleged that the respondents have copied their distinct “Wing Device” logo in a way that the motorcycles manufactured by the complainant and those manufactured by the respondents are indistinguishable, the Respondents are creating an impression in the minds of the consumers that the products of the Respondents are actually that of the Complainant and passing off their goods to the consumers as the goods of the Complainant. This act of the Respondents is, thus, also capable of harming the business interest of the Complainant. It has been alleged that such conduct amounts to deceptive marketing practices in violation of Section 10 of the Act.
3. Keeping in view the foregoing, the Competent Authority initiated an Enquiry in accordance with sub-section (2) of Section 37 of the Act by constituting an Enquiry Committee. The Enquiry Committee was directed to conduct the enquiry on the issues raised in the complaint and to submit the enquiry report by giving findings and recommendations *inter alia* on the following:

Whether the allegations leveled in the complaint constitutes a *prima facie* violation of Section 10 of the Act.

B. UNDERTAKINGS

Complainant:

4. Atlas Honda Limited was formed in 1962 as a result of technical collaboration between Honda Motors, Japan and Atlas Group. In 1965, the Company became the first-two wheeler manufacturer to be listed on the Karachi Stock Exchange after it commenced commercial production with an annual capacity of 6,000 units. Hence, Atlas Honda Limited is an undertaking as defined in clause (q) of sub-section (1) of Section 2 of the Act.

Respondent No. 1:

5. M/s Shafique Sons is involved in the business of manufacturing, marketing and selling of motorcycles. It operates in Hyderabad with a production capacity of 15,000 units. Its motorcycles come under the brand name of “Jinan”.

Respondent No. 2:

6. Pak Hero Industries is engaged in business as a manufacturer and assembler of two-wheeler and three-wheeler automobiles and actively markets and sells motorcycles under the brand name “Pak Hero”. Pak Hero has an installed capacity of 20,000 units.

Respondent No. 3

7. United Motor Company is engaged in business as a manufacturer and assembler of two-wheeler and three-wheeler automobiles and actively markets and sells motorcycles under the brand name “United Seven Star” and “Shine Star”.

C. COMPLAINT

8. The Complainant is a joint venture between the Atlas Group and Honda Motor Company Ltd, Japan (HMC). HMC is a world renowned company that manufactures motorcycles and motor vehicles under the brand name/trademark “Honda”. HMC is one of the world’s largest motor cycle manufacturers since 1959. Being a large corporation, HMC actively pursues new areas of development and hence heavily invests in research and development.
9. The Complainant has been operating its business in Pakistan since 1962 and has established the position of an industrial giant in the country. The annual sales figure of the complainant for the year of 2013 is PKR 42.3 Billion.
10. The Complainant has been extensively manufacturing, marketing and selling motorcycles under the globally renowned and distinctive logo/device which is referred to as the “Wing Device”. Resources, research and time has gone into the development of this logo. This logo was first created in 1947 and since then has been used as an identity/recognition of Honda motorcycles. The complainant’s registered logo/trademark has acquired substantial goodwill and reputation.
11. It was alleged by the Complainant that the products manufactured by them are made in accordance with the international standards. That by virtue of long and exclusive quality production, the products manufactured by the Complainant are demanded by consumers/ buyers of all classes public and recognized as quality goods emanating from the Complainant and none else throughout Pakistan.
12. The Complainant stated that they have always been very vigilant in protecting its proprietary rights to the exclusion of others in respect of the Logo/Trademark Wing Device which is duly recognized and registered <Annex-A> across the globe.
13. The Complainant has alleged that the respondents’ deliberate, willful and intentional actions are contrary to fair and healthy competition in the industry and are in utter violation and breach of Section 10 of the Act. The complainant has

referred to the previous violation of the use of the famous BMW and Harley Davidson logos as precedent for this case.

14. That the Complainant has successfully developed a trade mark that is instantly identifiable as being associated with the Complainant's company and is a symbol of quality that attracts customers. The imitation of the trademark by the respondents causes deception amongst consumers and is a direct violation of the Act pertaining to deceptive marketing practices as defined under Section 10 (2) (d) of the Act and is prohibited under Section 10 (1).
15. The Complainant has further submitted that the respondents continue to distort healthy competition by adopting a similar trade mark, as well as trade dress of the Complainant and use the recognition and goodwill associated with the Complainant's trademark for personal gains. The complainant is a market leader and has created a visual brand identity for its products.
16. That it is likely to cause more damage to the sales of the Complainant since the products, channels of trade, sale outlets and potential customers of the Complainant and the Respondents are the same.
17. The Complainant sustained damages as a direct and proximate result of the Respondents' infringement of the exclusive trade dress and the Wing Device. If the Respondents' continue this deception, the Complainant will undergo substantial losses and irredeemable harm to its goodwill and reputation.
18. Furthermore, the Complaint states that the fraudulent and unauthorized use of the Complainant's trade dress and Wing Device also runs the risk of generalizing the Wing Device for all kinds of motorcycles, be it high or low quality, thus diluting the distinctiveness of the Complainant's product. Furthermore, the Respondents' deceptive marketing practices are directly affecting the consumer as they are deceived into purchasing lower quality products.
19. The Complainant submitted, that these deceptive marketing practices have a direct impact on the consumer as they are being duped into purchasing low quality products and it is in the interest of general public that the respondents are held accountable and action be taken to provide remedy to the injury and harm done to the Complainant business and goodwill.
20. The reliefs claimed in the complaint are as follows:
 - (i). To take action under Section 10 of the Act.
 - (ii). Restrain the Respondent from engaging in Deceptive Marketing practices.
 - (iii). Order directing the confiscation, forfeiture, destruction or market withdrawal of all deceptive, copied or infringing products or publicity material.
 - (iv). Order directing the Respondents to compensate the Complainant for cost of filing the complaint with the Commission.

- (v). Any other relief deemed fit in the circumstances

D. DECEPTIVE MARKETING PRACTICES

21. The Respondents, by frequently using the trade mark of the Complainant *prima facie* violate Section 10(2)(d) of the act, which is also capable of harming the business interest of the other undertakings, i.e. Deceptive Marketing practices. For ease of reference Section 10 has been reproduced below

Deceptive marketing practices.— (1) No undertaking shall enter into deceptive marketing practices.

(2) The deceptive marketing practices shall be deemed to have been resorted to or continued if an Undertaking resorts to—

(a) the distribution of false or misleading information that is capable of harming the business interests of another undertaking;

(b) the distribution of false or misleading information to consumers, including the distribution of information lacking a reasonable basis, related to the price, character, method or place of production, properties, suitability for use, or quality of goods;

(c) false or misleading comparison of goods in the process of advertising; or

(d) fraudulent use of another's trademark, firm name, or product labeling or packaging.

E. RESPONDENT'S REPLY:

22. In order to investigate the issues raised by the Complainant, a letter was sent to each of the Respondents for comments and substantiation. The responses of the respondents are as follows:

F. IN THE MATTER OF M/S SHAFIQUE SONS

23. In the Para wise comments sent by the legal counsel of M/s Shafique Sons, the infringement of HMC's trademark was denied. The preliminary objections are summarized as follows:

- a) The complaint has not been properly instituted or signed by a competent authority. There is no proof of the signatory being the authorized legal counsel of the Complainant.
 - b) Since the complaint is filed by an unauthorized person, the complaint should not proceed and should be dismissed.
 - c) The documents provided are uncertified and invalid. Therefore, these documents cannot be relied upon as they are fictitious and incomplete.
 - d) The signatory has misstated facts, and based the complaint on unfounded allegations while also concealing documents.
 - e) Documents showing the actual damage that has been incurred to sales have not been submitted.
 - f) It is mandatory to provide statistical documents in order to prove HMC as the world largest producer of combustion engines and also to claim the fact that large amounts were invested in advertising is not enough without statistical data.
 - g) The logo of M/s Shafique Sons was inspired by a religious affiliation – namely “Jinan” whose shrine is situated in Karachi. The logo has no resemblance with that of the Complainant’s.
 - h) M/s Shafique Sons vehemently challenges the validity, enforceability, legality and admissibility of all documents relied upon by the Complaint in absence of the Memorandum of Association and Article of Association.
24. The comments/reply of M/s Shafique Sons was sent to the Complainant for their rejoinder if any. The summarized submission of the rejoinder is as follows;
- a) The objections about maintenance of the Complaint are absolutely frivolous and the allegations about validity of signing authority was out rightly denied as it was authenticated by a duly authorized signatory.
 - b) Similarly documents attached by the Complainant establish substantial market presence of Honda Motorcycles and Honda Wing Device and Trade Dress are well known throughout the world which is being imitated by the Respondents.
 - c) The Respondent No.1’s claim that its logo is an Ode to Islamic history and imaginary and derived from saint Jinan and it represents the first four caliphs is also baseless and was denied. In fact the Respondents appear to be acting collusively and attempting to shelter behind claims based on religious and spiritual foundations which is also deceitful , immoral and religiously insensitive.
 - d) The respondent has deceitfully questioned the legitimacy of Complainant’s documents and their validity but they have failed to substantiate the unlawful adoption of an imitated logo/trademark. Thus they are involved in deceptive marketing practices.

- e) The Complainant has proved by furnishing documentary proof that Respondents have deceitfully copied its distinctive logo which is manifestly an act of involving in deceptive marketing practice. It is evident that the deceptive use of an imitated logo can lead to confusion and deception amongst the consumers. The Complainant's products being of premium quality is a symbol of pride for the consumers. The deceptive adoption of logo by the Respondents may cheat the consumer when the same logo is used on non-premium products.
- f) The Respondents have failed to establish any valid grounds to disentitle the complainant from seeking relief from the Commission.

G. IN THE MATTER OF PAK HERO INDUSTRIES (PVT) LTD.

25. The para-wise comments submitted by Pak Hero are as follows
- a) The complaint has not been properly instituted or signed by a competent authority. There is no proof of the signatory being the authorized legal counsel of the Complainant.
 - b) Since the complaint is filed by an unauthorized person, the complaint should not proceed and should be dismissed.
 - c) The documents provided are uncertified and invalid. Therefore, these documents cannot be relied upon as they are fictitious and incomplete.
 - d) The signatory has misstated facts, and based the complaint on unfounded allegations while also concealing documents.
 - e) Documents showing the actual damage that has been incurred to sales have not been submitted.
 - f) It is mandatory to provide statistical documents in order to prove HMC as the world largest producer of combustion engines and also to claim the fact that large amounts were invested in advertising is not enough without statistical data.
 - g) The logo of Pak Hero was inspired by a religious song composed by Micheal Joncas in 1979. The logo has no resemblance with that of the Complainant's.
 - h) Pak Hero Industries vehemently challenges the validity, enforceability, legality and admissibility of all documents relied upon by the Complaint in absence of the Memorandum of Association and Article of Association.
26. In response to the comments furnished by M/s. Pak Hero Industries (Pvt) Limited, (Respondent No.2), it was stated by the Complainant that:-

- a) The Respondent No.2 admittedly entered into an agreement with another entity namely the “Orient Group” and that party has been using the objected logo without their permission. Now the said agreement stands terminated. In light of the above facts, the Complainant is amenable to the conclusion of proceedings against the Respondent No.2 subject to the condition that the said Respondent undertakes that, henceforth, it shall not adopt the Complainant’s Trade Dress/Trade Mark/Logo or engage in deceptive market practices.
- b) The Respondent No.2 other objections against the maintainability of the complaint and validity of its authentication being frivolous was denied out rightly.
- c) Since the Respondent No.2 also appear to be acting collusively and attempting to shelter behind claims based on religious and spiritual foundations, the Commission may take notice of collusion between the Respondents which is clearly established by their acts and identical nature of replies.
- d) The Respondent has failed to deny the adoption of an imitated logo/trade mark and participation in deceptive marketing practice.
- e) The deceptive use of an imitated logo can easily lead confusion and deception amongst the consumers. The Complainant products being of a premium quality, the logo becomes a symbol of pride for the consumers.

H. IN THE MATTER OF M/S UNITED MOTORS

27. The para wise comments submitted by M/s United Motors are summarized as follows:
 - a) The Wing Device of United Motors is distinctively different from that of HMC’s. Hence there is no question of confusion or deception amongst consumers.
 - b) That the Wing Device has become a common marketing characteristic/feature in the motorcycle industry. That “almost all” manufactures have used the Wing Device as their trademark for several years.
 - c) The branding of United Motor is dissimilar to that of HMC’s; since its line of motorcycles is named “United Seven Star”, there is no deception in the market.
 - d) The allegation of duplicating HMC’s trademark is false and is denied by United Motors.
 - e) The complainant’s allegations have been created to harass the respondent.
28. While furnishing their comments on the reply received from M/s. United Motor Company (Respondent No.3) the Complainant further submitted in the rejoinder as under:-

- a) The Respondent No.3 contention that there is no similarity between the Complainant's Wing device trademark/logo and the logo used by them is false and baseless. Thus being untenable liable to be rejected. In fact, the two logos are fundamentally identical and are being used in identical manner.
- b) The Complainant is the largest manufacturer of motorcycles in Pakistan and its products are premium quality and the trademark "Wing Device" has acquired substantial goodwill among the consumers. Thus, the traders have started imitating this popular logo violating specific provisions of the Act.
- c) The copies of certain searches obtained from the office of Trademarks Registry by the Respondent in an authorizing manner have no validity. The Complainant's trademarks are duly registered and the complainant has its exclusive right of use. The Respondent's contention that "Wing Device" has become 'common-to-trade' is entirely baseless and untrue. The Commission may also initiate action against other such manufacturers.
- d) The Respondent may develop its own logo and brand identity if it believes in fair trade practices.
- e) Admittedly the Respondent No.3 along with few others is using the imitated logo which is distorting fair competition and causing deception and confusion among the consumers.
- f) The Registrar of Trademarks has not rendered the Complainant's Trade Mark to be common-to-trade and has awarded full, exclusive rights to the Complainant. Hence contention of the Respondent No.3 is baseless.
- g) The Respondents have failed to establish any grounds in their favor.

I. ANALYSIS & FINDINGS:

29. As already mentioned in Para 3 the mandate of this Enquiry is as follows:

Whether the allegations leveled against the Respondent under the complaint constitutes a *prima facie* violation of Section 10 of the Act?

I. WHETHER THE ALLEGATIONS LEVELED AGAINST THE RESPONDENT UNDER THE COMPLAINT CONSTITUTES A *PRIMA FACIE* VIOLATION OF SECTION 10 OF THE ACT?

30. The Complainant in the instant matter has primarily alleged that the Respondent's deliberate, willful and intentional actions are contrary to fair and healthy competition in the industry and are in utter violation and breach of Section 10 of the Act.

31. The Compliant further alleged that respondent are manufacturing, offering for sale, marketing and selling motorcycles using the renowned and registered WING DEVICE and Trade Dress of Complainant on their motorcycles without the permission of the of the Complainant. Such unauthorized and fraudulent use of the Trade Dress and Wing Device of the Complainant falls within the meaning of the 'Deceptive Marketing Practices' as defined under the Section 10(2)(d) of the Act and is prohibited under Section 10(1) of the Act.
32. The Compliant stated that the respondent actions are causing substantial deception and confusion and resulting in the unjust dilution of the Complainant's goodwill and exclusivity with regard to its registered trademark.
33. The complainant states that the respondent no 1 is engaged in the business as manufacturer, assembler and seller of motorcycles that markets, sells and distributes motorcycles under the brand name/ Jinan.
34. The Compliant claimed that by investigating into the matter it was revealed that the said Respondent no 1 had not only adopted the Complainant's Wing Device but was also using the Atlas Honda Trade Dress with the phrase "Safe Deposit 70" on its motorcycles in the exact same manner and calligraphy as used by Complainant in the style and form "Cash Deposit 70".
35. The Complainant claimed that the Respondent no 1 instead of creating a unique brand identity for its products adopted the Wing Device and Atlas Honda Trade Dress with the sole intention to deceive and to lure the general public into buying their product under the expectancy of buying genuine high quality products as those of complainant.
36. The complainant states that during the course of its business they learnt that the Respondent No 2 is infringing upon the exclusive proprietary rights of the Complainant in respect of its globally renowned and distinctive logo Wing Device which is registered trademark of the Complainant.
37. The Complainant alleged that the adoption and use of the aforesaid Wing Device and continuing use of the Wing Device by Respondent no 2 is nothing but an outcome of fraudulent tactics with the sole aim to capitalize the popularity and the influence that the Complainant Wing Device has on the consumer globally. The imitated Altas Honda Trade Dress and Wing Device, as used by the Respondent no 2 establishes the fact of competing unfairly by the said respondent thereby causing irreparable harm to the business of Complainant.
38. The complainant alleged that Respondent no.2 is using the Complainant's Wing Device in the exact style and manner and selling the motorcycles under the name "Shine Star".
39. In the preceding paragraphs the facts and evidence submitted by the Complainant and Respondents are analyzed and discussed in order to reach a conclusion

regarding the issues at hand, that is, whether the Respondents involved in the infringement of the Complainant's trademark and in doing so potentially mislead consumers and is in prima facie, violation of Section 10 of the Act.

40. In order to establish whether the Respondents are involved in the infringement of the trademark, it is pertinent to compare the products of the each company. An image of the Complainant's motorcycle is depicted below:



41. The specification of the model "Cash Deposit 70" appears next to the Wing Device of Atlas Honda.
42. In the case of Respondent No. 1; M/s Shafique Sons, an image of their motorcycle is depicted below:



43. It is clearly visible that Respondent No. 1 has copied the Wing Device of the Complainant. Moreover, it is also evident that the product labeling i.e calligraphy used for the name of the model (appearing next to the Wing Device) is also very similar to that of the Complainant. The only difference is of the word “Safe” in “Safe Deposit 70” as compared to the Complainant’s model which is named “Cash Deposit 70.” The fact that Respondent No. 1 has adopted a trade dress which is obviously parallel to that of the Complainant’s, points out that the Respondent is attempting to mislead consumers into making an impulsive decision into buying their product which looks “almost” identical to that of the Complainant.
44. An image of Respondent No. 2; Pak Hero (Pvt) Ltd is depicted below:



45. Similar to Respondent No. 1, Respondent No. 2 is also engaged in infringing the proprietary rights of the Complainant in terms of its Wing Device. Also, the trade dress is similar to the Complainant's i.e the placing of text and colour used.
46. An image of Respondent No. 3; M/s United Motor Company Ltd is depicted below:



Respondent No. 3 markets, sells and distributes motorcycles under the brand name “United Seven Star” and “Shine Star”. The style and design of the Shine star logo is very similar to the Wing Device of the Complainant.

47. It is also pertinent to mention that the contention put forward by Respondent No. 3 which claims that the wing device has come “common-to-trade” is not correct. Major motorcycle company logos were observed and each company has developed its own brand logo in order to distinguish itself from others. Some examples are presented below:



48. In the argument put forward above, it can be simply understood that the Respondents have not only imitated the trademark of the Complainant, but by adopting a similar trade dress, the Respondent's mislead consumers which has a direct impact on their buying decisions. This is in violation of Section 10 of the Competition Act specifically relating to Subsection (1), (2) (a), (b) and (d).
49. In order to validate the claims put forward by the Complainant, an extensive research was conducted by the enquiry committee. Firstly, the Complainant claims that it is a market leader in motorcycle manufacturing. According to Honda's reported sales from the fiscal year ending on March 31, 2013, Honda's motorcycle operations generated net sales of 1.34 trillion yen, which is \$13.7 billion U.S. dollars.¹ Having the highest number of sales makes Honda a market leader in Asia. The Complainant has also asserted that it has created a visual brand identity through its "wing device" which is associated with Honda only. Looking at the history of the "wing device" which came into use around the 1950's, the motorcycles manufactured by Honda have been using the logo for more than 60 years, which indeed creates an association with the brand and Honda motorcycles are identified by its distinct logo.
50. Before discussing the submissions of the Complainant and Respondent, it is important to shed light on competition legislation pertaining to trademark infringement. In the matter of M/s Ace Group of Industries, the Commission held that:

¹ http://world.honda.com/investors/library/annual_report/2013/honda2013ar-all-e.pdf

I am of the considered view that, deceptive marketing in terms of Section 10 of the Ordinance has been carried out by AGI and the fraudulent use of the trademark by AGI was very much capable of harming the business interest of the complainants in violation of Section 10(1) read with Section 10 (2)(a) & (d) of the Ordinance.²

In this connection, we would like to rely upon the judgments of *Philips Electronics NV v Remington Consumer Products Ltd* and *Arsenal Football Club v Mathew Reed* 2003, where in it was held that:

“the essential function of a trademark is to guarantee the identity of origin of the marked goods or services to the consumer or end user by enabling him, without any possibility of confusion, to distinguish the goods or services from others which have another origin. For the trademark to be able to full fill its essential role in the system of undistorted competition, it must offer a guarantee that all the goods or services bearing it has been manufactured or supplied under the control of a single undertaking which is responsible for their quality”.³

51. The reply comments furnished by the respondent and the complainant have been examined carefully in light of the documents produced by the respective parties. In order to substantiate their contentions, we are of the opinion that the respondents are admittedly involved in deceptive marketing practices in violation of the provisions of the Competition Act 2010; since they have imitated the registered trademark of the complainant which is the largest manufacturer of motorcycles in Pakistan.
52. Although Respondent No. 2 has stated that they have discontinued using the wing device of the Complainant, and that the agreement executed with a third party namely the orient group has been terminated, it is an admitted fact that they have been using the trademark of the Complainant for a considerable period.
53. It is pertinent to mention that in an automobile industry a distinguished logo of different products is a fundamental component of brand identity. The deceptive use of imitated logo can lead to confusion and deception among the consumers

² http://www.cc.gov.pk/images/Downloads/bmw_harley_davidson_final_order.pdf

³ http://www.ippt.eu/files/2002/IPPT20020618_ECJ_Philips_v_Remington.pdf

particularly when a non premium product is sold under the logo of premium quality product at a cheaper price.

54. The respondent's products under the imitated trademark in total disregard to the proprietary rights vested in the Complainant in respect of the Trade Dress and registered Wing Device strongly possess the ability to mislead the consumers and induce them to make transactional/ financials decisions based upon the duplication of Complainants Trade Dress and Wing Device.
55. That the respondents actions are likely to cause even more damage due to the fact that the products channels of trade, sale outlets and probable customers of the Complainant and that of the respondents are the same.
56. That the complainant business interest is harmed as a result of Respondent's infringement of exclusive Trade Dress and Wing Device. In the event that the Respondents are allowed to carry on with its deceptive and unfair practices, the complainant will suffer substantial business losses, and suffer irremediable harm to its goodwill, reputation and exclusivity.
57. In view of the above it can easily be established that the Respondents, by using a registered trademark of another manufacturer have enjoyed the goodwill and reputation of another entity. Therefore the Respondents have prima-facie entered into deceptive marketing practices in terms of section 10 (2) (a) & (d). It is obvious that misleading information always attracts consumers to purchase the products of low quality which provide the undertaking a competitive edge over the competitors. Thus, in order to protect public interest, the undertakings should be discouraged from selling their products in a deceptive manner and be directed to adopt such practices which are transparent and give consumers/customers true and correct information about their products. Under the circumstances, it is recommended that a show cause notice may be served to the Respondents for violating the provisions of Section 10 (2) (a) & (d) of the Act.

J. RECOMMENDATIONS

58. The deceptive marketing practices discussed in this enquiry report have a direct impact on the public at large. It is in the interest of the general public that the undertakings should be stopped to advertise their products/services in an unfair and misleading manner and be encouraged to resort to the advertising practices which are transparent and gives consumers/customers true and correct information. Prima facie violations under the Act in terms of the findings of this enquiry report warrant initiation of proceedings against following respondents, under Section 30 of the Act in accordance with law:

Noman Laiq
(Enquiry Officer)

Faiz-ur-Rehman
(Enquiry Officer)

Reesham Ibrahim
(Enquiry Officer)