

SHAMS LAW CHAMBER

Barristers & Advocates

No: JSLC/REG/2025/051

Date: 27th October 2025

To:

1. The Director General,
Sindh Safe Cities Authority, Karachi
2. The Secretary,
Ministry of Information and
Broadcasting, Government of Pakistan, Islamabad
3. The Secretary,
Ministry of Transport and Mass Transit,
Government of Sindh, Karachi
4. The Inspector General of Police,
Sindh Police, Karachi
5. The Administrator/Mayor,
Karachi Metropolitan Corporation, Karachi
6. The Deputy Inspector General of Police (Traffic),
Sindh Police, Karachi.

Legal Notice to Refrain from Enforcement of the Karachi Safe City Project's Camera-Based E-Challan and Surveillance Mechanism Until Proper Urban and Traffic Infrastructure is Restored, Standardised, and Calibrated

Respected Sir/Madam,

Under instructions and on behalf of my client Mr. Mir Mohsib Talpur, resident of Karachi, a citizen aggrieved by the premature implementation of the *Karachi Safe City Project (KSCP)*, I hereby

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serve upon you this Legal Notice calling upon all concerned authorities to immediately suspend and refrain from initiating camera-based e-challan enforcement and traffic surveillance penalties under the Safe City mechanism until Karachi's basic traffic and road infrastructure is restored, maintained, and standardised in accordance with law and international safe-city protocols.

The purpose of this initiative is to modernise policing and improve road safety – is in itself laudable. Yet, the practical circumstances of Karachi render its enforcement premature, inequitable, and unjust. A law or system, however well-intentioned, must not be applied where the very conditions for its fair operation are absent.

Karachi's urban and traffic infrastructure has long been in disrepair. Roads across the city – from Saddar to Korangi, from Liaquatabad to DHA – are uneven, damaged, and obstructed by encroachments. Lane demarcations are faded or missing altogether, zebra crossings are invisible, and speed-limit boards are rarely found or are inconsistent. In many localities, traffic signals remain non-functional for prolonged periods due to power failures or neglect, compelling traffic wardens to manually regulate flow. Yet, the automated cameras now installed record such movements as violations, penalising citizens who, in fact, obey the directions of traffic officers.

The problem is compounded by insufficient street lighting, broken signboards, and open manholes that make road conditions unpredictable. Number-plate recognition at night remains unreliable, while large stretches of road lack any defined speed zones or signboards to guide drivers. Before a citizen is fined for violating a signal or exceeding a speed limit, the signal and the limit must exist, be visible, and function properly.

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Anything less offends the most elementary principles of fairness and due process.

It is noteworthy that cities such as Lahore and Islamabad – where similar systems are operative – first standardized their infrastructure: signals are synchronized, roads are resurfaced, and signages are uniformly displayed. Karachi, however, is attempting enforcement in reverse order – **technology before infrastructure, penalty before preparedness**. This inversion of priorities turns an otherwise progressive initiative into a source of public hardship and resentment.

Another fundamental flaw lies in the outdated record of vehicle ownership. A significant number of vehicles plying Karachi's roads remain registered in the names of previous owners. Without a proper transfer of registration, E-challans are being issued to persons who no longer possess the vehicles concerned. This not only renders enforcement ineffective but also exposes innocent citizens to unnecessary legal complications.

The Constitution guarantees every citizen the right to be treated in accordance with law and to be protected from arbitrary action. **Enforcement of automated penalties amid broken roads, unmarked lanes, non-functional signals, and inaccurate registration data is inconsistent with those guarantees.** Such a system punishes citizens not for indiscipline but for the failures of administration.

I am, therefore, instructed to call upon all concerned authorities to immediately suspend the implementation of the camera-based e-challan system until the city's traffic infrastructure is restored and standardized. This includes the full repair and marking of roads, functioning and calibrated signals, installation of speed-limit boards and signages, illumination of major intersections, and correction of vehicle registration records. Only

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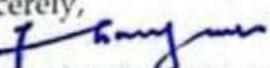
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after these measures are achieved can the enforcement of an automated system be fair, lawful, and credible.

Should this notice not receive due attention within seven (7) days of its receipt, my client will be constrained to invoke the constitutional jurisdiction of the Honourable High Court of Sindh under Article 199 of the Constitution, seeking judicial intervention, suspension of enforcement, and such other relief as the law may permit.

This notice is issued not in defiance of modernization but in defense of reason, fairness, and good governance. A city cannot be made safe merely by cameras; it is made safe by order, by justice, and by roads fit for the citizens who travel upon them.

Sincerely,



JAHANGIR SHAMS
Advocate High Court.

Shams
Law Chamber
Karachi · Hyderabad · Sukkur