

IN THE SUPREME COURT OF INDIA

CRIMINAL ORIGINAL JURISDICTION

WRIT PETITION (CRL.) NO. OF 2018

(Under Article 32 Of the Constitution Of India)

IN THE MATTER OF:

Seema Bhoria

...Petitioner

Versus

State Of Jammu & Kashmir & Anr

...Respondents

PAPER BOOK

(FOR INDEX, PLEASE SEE INSIDE)

Advocate For Petitioner Satya Mitra

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PROFORMA FOR FIRST LISTING

SECTION _____

The case pertains to (Please tick/check the correct box):

Central Act: Constitution of India

Section(s): Art 21 and 19 of the Constitution of India

Central rule: (Title) N.A

Rule No(s): N.A

State Act (Title) N.A

Section: N.A

State Rule (Title) N.A

Rule No(s): N.A

Impugned Interim Order: N.A

Impugned Final Order/Decree: N.A

High Court: N.A

Name of Judges: N.A

Tribunal/Authority: (Name) N.A

-
1. Nature of matter: Civil Criminal
 2. (a) Petitioner/Appellant: Seema Bhoria
(b) E-mail ID: N.A
(c) Mobile Phone Number: N.A
 3. (a) Respondent: State of Jammu and Kashmir
(b) E-mail ID: N.A
(c) Mobile Phone Number: N.A
 4. (a) Main category classification: N.A.
(b) Sub classification:

5. Not to be listed before:
6. Similar/Pending matter:
7. Criminal Matters:
- (a) Whether accused/convict has surrendered:
 Yes No
- (b) FIR No: _____ Date: _____
- (c) Police Station: _____
- (d) Sentence Awarded: _____ N.A
- (e) Sentence Undergone: _____ N.A
8. Land Acquisition Matters:
- (a) Date of Section 4 notification: _____ N.A
- (b) Date of Section 6 Notification: _____ N.A
- (c) Date of Section 17 notification: _____ N.A
9. Tax Matters: State the tax effect: _____ N.A
10. Special Category (first petitioner/appellant only):
- Senior citizen > 65 years SC/ST
- Woman/Child Disabled
- Legal Aid case In custody
11. Vehicle Number (in case of Motor Accident Claim matters): _____ N. A
12. Decided case with citation: _____ N.A

Date:

Filed by:

SATYA MITRA

Advocate for the Petitioner

576 Masjid Road, Bhogal,

Jungpura, New Delhi-110014

Email id: satyamitra2003@yahoo.co.in

SYNOPSIS AND LIST OF DATES

1. This is a habeas corpus petition seeking the release of Ms. Farah Anjum (hereinafter '*detenue*') from illegal detention; detenue aged 26 years who is currently in detention at MFM, Nari Niketan, Shalimar, Srinagar is the next close friend of the Petitioner, Ms. Seema Bhoria.

2. MFM, Nari Niketan, Shalimar, Srinagar is a government orphanage where Deputy Commissioner Anantnag, Tehsildar Anantnag, Superintendent MFM, Nari Niketan, S.S.P., Anantnag and the family members of the detenue i.e. Muktar Ahmad Pehlwan (father of the detenue), Qouensar Shamin (mother), Mansoor Ahmad Ganaie (uncle), Raees Ahmad Dar (maternal uncle) and Rashid Ahmad Dar (maternal uncle) have conspired to keep the detenue in unlawful detention and have tortured her in order to force her to marry her maternal uncle Raees Ahmad Dar who is over 40 years old and is already married and has 2 children. He is a wealthy man with contacts in the police and administration.

3. The detinue has completed her M.Sc. Biotechnology from Srinagar University, Kashmir. For many years Raees Ahmad Dar and Mansoor Ahmad Ganaie used to sexually molest the detinue. She complained to members of her family including her parents but only did they not do anything rather they beat the detinue for complaining. The family kept on insisting that she should marry Raees Ahmad Dar.

4. On 20.9.18 she complained to the police about the sexual and physical torture. This is at Annexure P-1 (Pages to). On 30.9.18 she complained to the National Commission for Women where she also added that her mother had threatened to kill her if she revealed anything to anybody. She gave details of beating. The complaint is at Annexure P-3 (Pages to). The receipt of this complaint dated 30.09.2018 is at Annexure P-4 (Pages to). She received a conformation of this complaint been registered by NCW with File No. 8/C180014155/2018/NCW/SS-AAR/GK on dated 3.10.18 at Annexure P-6 (Pages to). Even in Nari Niketan those who were abusing her were

allowed to meet her by the Superintendent and they threatened her once again.

5. On 20.9.18 the detenu was rescued from her house and kept in Social Welfare House, Mattan, Anantnag and a few days later she was shifted to Nari Niketan.
6. On 21.9.18 detenu's signature was taken on a blank piece of paper and the detenu believes that some illegal use would be made of this.
7. Detenu states that even though she was beaten brutally by the abovementioned people from time to time she was not given medical attention. Particularly on 20.9.18 detenu sustained many injuries and though she was rescued by the police and the SHO and she requested medical attention it was refused. Detenu states that the persons mentioned in the second paragraph have close connections with the police and administration and this is why they managed to get away for all these times. Hence it is very important that she should leave the State because it is quite possible that she will be murdered.

8. On the 24.9.18 detenue also complained to the Hon'ble Prime Minister through an online portal called the "Public Grievance Portal" and her complaint was registered as PMOPG/E/2018/0456491 at Annexure P-2 (Pages to) hereto is the receipt of registration number.
9. On 1.10.18 detenue wrote a mail to her friend Seema Bhoria who is the present petitioner. This is at Annexure P-5 (Pages to). Detenue wrote another email on 4.10.18 asking the petitioner to represent her in the concerned forum at Annexure P-7 (Pages to).
10. There is a continued threat to detenue's life by the persons mentioned in paragraph 1. They had threatened to kill her and she apprehends violence. It is urgent that this Hon'ble Court intervene and have her released from custody so that she can immediately leave the State and live elsewhere.
11. The exhibits of this petition are typed in wrong English as they are verbatim from the detenue.

LIST OF DATES AND EVENTS

DATES	EVENTS
20.09.2018	The Detenue sends an e-mail dated 20.09.2018 to Inspector General and Superintendent of Police, Anantnag about the sexual and physical torture by Muktar Ahmad Pehlwan (father of the detenue), Qouensar Shamin (mother), Mansoor Ahmad Ganaie (uncle), Raees Ahmad Dar (maternal uncle) and Rashid Ahmad Dar (maternal uncle).
20.09.2018	The Detenue was rescued from her house and kept in Social Welfare House, Mattan, Anantnag on dated 20.09.2018. Though the detenue was rescued by the police and the SHO but her request for medical attention was brutally refused by the police officials.
21.09.2018	The Detenue's signature was taken on a blank piece of paper by Tehsildar on

dated 21.09.2018.

- 24.09.2018 The detenue also complained to the Hon'ble Prime Minister on dated 24.09.2018 through an online portal called the "Public Grievance Portal" and her complaint was registered with registration number PMOPG/E/2018/0456491
- 30.09.18 The Detenue complained to the National Commission for Women on dated 30.9.18, where she also added that her mother had threatened to kill her if she revealed anything to anybody. She gave details of beating.
- 1.10.2018 The Detenue wrote an e-mail on dated 1.10.2018 to her friend Seema Bhoria who is the present petitioner about the sexual and physical torture by her family members and relatives.
- 03.10.2018 The Detenue received a conformation of the complaint dated 30.09.2018 been registered by NCW with File No.

8/C180014155/2018/NCW/SS-AAR/GK

on dated 3.10.18

4.10.18 The Detenue write another e-mail dated 4.10.2018 asking the petitioner to represent her in the concerned forum.

Hence this Writ Petition for Habeas Corpus

IN THE SUPREME COURT OF INDIA
CRIMINAL ORIGINAL JURISDICTION
WRIT PETITION (CRL.) NO. OF 2018
(Under Article 32 Of The Constitution Of India)

IN THE MATTER OF:

1. Seema Bhoria,
House No. 75,
Police Colony, Shalimar Bagh
Delhi- 110088

...Petitioner No. 1

Versus

1. State Of Jammu And Kashmir
Through Chief Secretary
R.No. 307, 3rd Floor,
Civil Secretariat, Srinagar,
Jammu And Kashmir-190001
2. Director General Of Police,
J&K, Srinagar (Summer
Session) Police Headquarter,
Airport Road, Peer Bagh
Srinagar,
Jammu And Kashmir,190001

...Respondent No. 1

...Respondent No. 2

WRIT PETITION UNDER ARTICLE 32 OF THE
CONSTITUTION FOR ISSUANCE OF WRIT OF HABEAS
CORPUS

To:

The Hon'ble the Chief Justice of India

and the Hon'ble Companion Judges

of the Supreme Court of India

This Humble Petition of the

Petitioner Abovenamed

Most Respectfully Showeth:

1. The present petition is a habeas corpus petition seeking the release of Ms. Farah Anjum (hereinafter '*detenue*') from illegal detention; detenue aged 26 years who is currently in detention at MFM, Nari Niketan, Shalimar, Srinagar is the next close friend of the Petitioner, Ms. Seema Bhoria.

2. That the petitioner has not filed any other similar petition before this Hon'ble Court or before Hon'ble Supreme Court of India or any other Hon'ble Court seeking similar relief.

3. MFM, Nari Niketan is a government orphanage where Deputy Commissioner Anantnag, Tehsildar Anantnag, Superintendent MFM, Nari Niketan, S.S.P., Anantnag and the family members of the detenué i.e. Muktar Ahmad Pehlwan (father of the detenué), Qouensar Shamin (mother), Mansoor Ahmad Ganaie (uncle), Raees Ahmad Dar (maternal uncle) and Rashid Ahmad Dar (maternal uncle) have conspired to keep the detenué in unlawful detention and have tortured her in order to force her to marry her maternal uncle Raees Ahmad Dar who is over 40 years old and is already married and has 2 children. He is a wealthy man with contacts in the police and administration.

4. The detenué has completed her M.Sc. Biotechnology from Srinagar University, Kashmir. For many years Rashid Ahmad Dar and Mansoor Ahmad Ganaie used to sexually molest and harass the detenué. She complained to members of her family including her parents but only did they not do anything rather they beat the detenué for complaining. The family kept on insisting that she should marry Raees Ahmad Dar who is already married with two children.

5. On dated 20.9.18 she complained to the police via e-mail, about the sexual and physical torture done by her family members and relatives. The true copy of the letter of complaint via e-mail to the police officials of Jammu Kashmir by the Detenue dated 20.09.2018 is hereto annexed and marked at **Annexure P-1 (Pages to)**.

6. On dated 30.9.18 she complained to the National Commission for Women where she also added that her mother had threatened to kill her if she revealed anything to anybody. She gave details of beating. True copy of the letter of complaint via e-mail by Detenue to NCW dated 30.09.2018 is hereto annexed and marked at **Annexure P-3 (Pages to)**. The true copy of the receipt with registration number: 2014110225949 of the complaint letter dated 30.09.2018 received by the Detenue on dated 30.09.2018 is hereto annexed and marked as **Annexure P-4 (Pages to)**. She received a conformation of this complaint been registered by NCW with File No. 8/C180014155/2018/NCW/SS-AAR/GK on dated 3.10.18. A true copy of the receipt

of the registration with File No.8/C180014155/2018/NCW/SS-AAR/GK of NCW complaint dated 30.09.2018 is dated 3.10.18 is hereto annexed and marked at **Annexure P-6 (Pages to)**. Even in Nari Niketan those who were abusing her were allowed to meet her by the Superintendent and they threatened her once again.

7. On dated 20.9.18 the detenu was rescued from her house and kept in Social Welfare House, Mattan, Anantnag and a few days later she was shifted to Nari Niketan.
8. On dated 21.9.18 detenu's signature was taken on a blank piece of paper and the detenu believes that some illegal use would be made of this.
9. Detenu states that even though she was mentally tortured and physically beaten up by the above mentioned people from time to time she was not given medical attention. Particularly on dated 20.9.18 detenu sustained many injuries and though she was rescued by the police and the SHO and she requested medical attention it was refused.

10. Detenue states that the persons mentioned in the second paragraph have close connections with the police and administration and this is why they managed to get away for all these times. Hence it is very important that she should leave the State because it is quite possible that she will be murdered.

11. On dated 24.9.18 detenue also complained to the Hon'ble Prime Minister through an online portal called the "Public Grievance Portal and her complaint was registered as PMOPG/E/2018/0456491 is hereto the receipt of registration number. True copy of the receipt of the complaint to the Hon'ble Prime Minister through an online portal, "Public Grievance Portal" dated 24.09.2018 is annexed and marked at **Annexure P-2 (Pages to)**.

12. On dated 1.10.18 detenue wrote an e-mail to her friend Seema Bhoria who is the present petitioner about the sexual and physical torture by her family members and relatives. True copy of the Detenue complaint via email to the Petitioner dated 1.10.2018

is hereto annexed and marked at **Annexure P-5 (Pages to)**.

13. Detenue then wrote another email on dated 4.10.18 asking the petitioner to represent her in the concerned forum. True copy of the email by the Detenue to the Petitioner for grant of permission to represent her in the concerned forum dated 4.10.2018 is hereto annexed and marked at **Annexure P-7 (Pages to)**.

14. There is a continued threat to detenue's life by the persons mentioned in paragraph 1. They had threatened to kill her and she apprehends violence. It is urgent that this Hon'ble Court intervene and have her released from custody so that she can immediately leave the State and live elsewhere.

15. The exhibits of this petition are typed in wrong English as they are verbatim from the detenue.

GROUNDS

16. Because Deputy Commissioner Anantnag, Tehsildar Anantnag, Superintendent MFM, Nari Niketan, S.S.P has no authority whatsoever to order the detention of Ms. Farah Anjum who is a major.

17. Because the custody of the Detenue in Nari Nikaten is a forced custody. And there is continuous threat to detenue's life by the family member and relatives

18. Because this Hon'ble Court in *Gian Devi v. The Superintendent, Nari Nikaten, Delhi, Ors.*,: 1976 (3) SCC 234, three-judge Bench observed that where an individual is over eighteen years of age, no fetters could be placed on her choice on where to reside or about the person with whom she could stay:

"...Whatever may be the date of birth of the Petitioner, the fact remains that she is at present more than 18 years of age. As the Petitioner is sui juris no fetters can be placed upon her choice of the person with whom she is to stay, nor can any restriction be imposed

regarding the place where she should stay. The court or the relatives of the Petitioner can also not substitute their opinion or preference for that of the Petitioner in such a matter."

19. Because a Constitution Bench of this Hon'ble Court, in *Common Cause (A Regd. Society) v. Union of India*, 2018: (Writ Petition (Civil) No. 215 of 2005) held:

"Our autonomy as persons is founded on the ability to decide: on what to wear and how to dress, on what to eat and on the food that we share, on when to speak and what we speak, on the right to believe or not to believe, on whom to love and whom to partner, and to freely decide on innumerable matters of consequence and detail to our daily lives."

20. Because in *Justice K.S. Puttaswamy v. Union of India*: 2017 (10) SCC 1, this Hon'ble Court in a decision of nine judges held that the ability to make decisions on matters close to one's life is an inviolable aspect of the human personality:

The autonomy of the individual is the ability to make decisions on vital matters of concern to life...

The intersection between one's mental integrity and privacy entitles the individual to freedom of thought, the freedom to believe in what is right, and the freedom of self-determination...

The family, marriage, procreation and sexual orientation are all integral to the dignity of the individual.

21. Because Detenue is not allowed to leave Nari Niketan is deprived of her liberty and expression of choice has led to the violation of Article 19 and 21 of the Constitution.'

22. Because the detenue's phone is being tapped by police officials, her right to privacy enshrined under article 21 is violated.

23. Because even in Nari Niketan those who were abusing her were allowed to meet her by the Superintendent and they threatened her once again.

24. That the petitioner has not filed any other similar petition before this Hon'ble Court or before Hon'ble Supreme Court of India or any other Hon'ble Court seeking similar relief.

PRAYER

In light of the facts and circumstances of this case, the Petitioners pray before this Hon'ble Court as under:

- a) For a writ of habeas corpus directing the DGP Jammu & Kashmir to forthwith meet the detenue and ascertain the facts and thereafter set the detenue free and provide her police protection so that she may leave the State and live elsewhere.

AND FOR THIS ACT OF KINDNESS, THE PETITIONER AS IN DUTY BOUND SHALL EVER BE GRATEFUL

Drawn on:

Drawn By: Advocate Shankari Mishra

Filed on:

SATYA MITRA

Advocate for the Petitioner

576 Masjid Road, Bhogal,

Jungpura, New Delhi-110014

Email id: satyamitra2003@yahoo.co.in

pages no. _____to _____ as shown to me and I say that the contents therefore are true and correct to the best of my knowledge and belief.

3. All the annexures of the Petition are the true copy of its original.
4. That the petitioner has not filed any other similar petition before this Hon'ble Court or before Hon'ble Supreme Court of India or any other Hon'ble Court seeking similar relief.
5. That I have been read over and explained in vernacular the contents of this affidavit and I state that nothing material has been concealed thereof and the contents of this affidavit are true and correct to the best of my knowledge and belief.

DEPONENT

VERIFICATION

Verified at New Delhi on this _____the day of _____of 2018 that the contents of the above Affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been conceived there from.

DEPONENT

APPENDIX:

I. *Constitution Of India 1949*

Article 32. Remedies for enforcement of rights conferred by this Part

(1) The right to move the Supreme Court by appropriate proceedings for the enforcement of the rights conferred by this Part is guaranteed

(2) The Supreme Court shall have power to issue directions or orders or writs, including writs in the nature of habeas corpus, mandamus, prohibition, quo warranto and certiorari, whichever may be appropriate, for the enforcement of any of the rights conferred by this Part

(3) Without prejudice to the powers conferred on the Supreme Court by clause (1) and (2), Parliament may by law empower any other court to exercise within the local limits of its jurisdiction all or any of the powers exercisable by the Supreme Court under clause (2)

(4) The right guaranteed by this article shall not be suspended except as otherwise provided for by this Constitution

II. *The constitution of Jammu Kashmir, 1956*

Article 10. The permanent residents of the State shall have all the rights guaranteed to them under the Constitution of India.

ANNEXURE P-1

The true copy of the letter of complaint via e-mail to the police officials of Jammu Kashmir by the Detenue dated 20.09.2018

From "Farah anjum" farahanjum74@gmail.com

Date: 20 Sep 2018 9:05 a.m.

Subject: Sexual abuse and harassment case regarding my family members my father mother brothers and my maternal uncles as well

To: dposrinager@jkpolice.gov.in , igkmr@jkpolice.gov.in,
dpoanantnag@jkpolice.gov.in, dpojammu@jkpolice.gov.in,
igjammu@jkpolice.gov.in, deepakachint@gmail.com,

Cc:

Sir,

I am the major having age 26 plus my parents are compelling me to do wrong things including sexual abuse harassment and physical torture as I want to study they don't even allow me to do so every day they beat me harass me even my maternal uncles have some links with police officers so they also harass me by saying we will kill you shooting you and all I am helpless sir please help me

to get out from here please sir they involves me in many wrong doings sexually abuse me and physically torture me and they call their nears they also harras me I want to live my life sir please help me even they have beaten me today a lot and kept me hungry for days and night I cannot sleep because I am in threat that they will kill me and compel me to do wrong things please sir help me I beg you please help me to get out from here I want live my life either I don't have any other option than suicide but sir I want to live please set me free as I am the major please sir I beg you please, sir I have been in this trauma form last 8 months sir please help me to get out from here otherwise they will kill me my maternal uncles as well and in case I may not be alive when you reach here my parents including my mummy papa baya and Rayess and Rashid as well will be wholly and solely responsible for my death. They are planning to kill me I don't have any option I am helpless and please help me my mother Qouensar Shamim my father Mukhtar Ahmad Pahalwan my brother Umar and Zaid and my mama Rayees Ahmad Dar, Rashid Ahmad Dar Kehte hai We have links with terrorists we can easily kill you. Please help me please for god sake.

Regards

Farah

On 20-09-2018 02:23 PM, farah anjum
farahanjum74@gmail.comwrote:

Sir,

Please help they kept me hungry I am afraid of them
please help, I am helpless they saying we will kill you my
mother uncle mama and all please help I don't know may
be they snatch my phone as they always do please sir aaj
kaise bhi mene phone na diya please help. Culprits my
maternal uncles my family and my family friend Pintu.

Farah anjum

S.k colony annatnag

Mukhtar ahmad pahalwan

8493055215

ANNEXURE P-3

True copy of the letter of complaint via e-mail by Detenue
to NCW dated 30.09.2018

From: "farah anjum" <farahanum74@gmail.com>

Date: 30 Sep 2018 1:21PM

Subject: most urgent/sexual harassment and torture information in connivance with authorities on the basis of gender and religion.

To:

complaintcell/ncw@nic.in, chairperson/ncw@nic.in, sharama.rekha@gov.in, ravat.alok@gov.in

Cc:

Respected Sir/ Mam,

I Farah Anjum, Age 26 am victim to cruelty, sexual harassment and torture (physical, mental) done by parents, brother and relatives naming:-

I) Mukhtar Ahmed Pahalwan II) Quosnar Shamim III) Umar Mukhtar IV) Raja Zaid r/o H.No. 3 S. Colony K.P. Road Anantnag, J&K

V) Raees Ahmed Dar Vi) Rashid Ahmed Dar R/o Takiya Befram Shah Distt, Anantnag J&K

VII) Manzor Ahmed Ganaie VIII) Mahajabeen R/o Wanpoh Khudwani Distt. Anantnag J&K

IX) Mohd. Lateef Lulu R/o Lazibal Anantnag J&K

1. I have been sexually harassed and tortured physically as well as mentally by the above naming

2. I was sexually abused and molested by Manzor Ahmed at a very young age he used to do bad acts with me but I was unaware at that time. Once my Auntie Mahajaben saw this as I was shouting and resisting the bad act of manzor ahmed she didn't took any action in order to save her home. No one raise voice against him because he is an influential man holding good office at Govt.

3. My mother Qouensar Shamim was aware of the incident but she kept silence over the matter and even starting cursing me that I was curse to the family and she insisted that I should be married as soon as possible.

4. My mother is having obsession with god knows what, she tells she is khuda and she have powers as she can see future and do good or bad to anyone.

5. My mother always cursed me and tortured me that I am like a woman who had an affair with my father and she will keep me as a slave. My mother was used to torture me like anything. I was given allegations with everyman on the account that I am not a good girl as I am curse and I may not prove to be a good daughter, wife, or mother and I don't have any right to lead a normal and happy life. She said I will marry you with father of two

children so I may not get respect out of my wedlock also. She said that she will take revenge of my father's relation with some other women from me by giving me life of a slave. She says islam permits her to do anything with me as she is a mother and nobody will listen to me and if I will reveal anything to anyone she will get me killed by her brother who have relation with local police and some terrorists also. I had no option to keep silence and just pray for my marriage or some job to get rid of this torture.

6. They give me allegations with any one no matter I have any relation with that person or not just to prove me bad at character. Now my mother want me to do bad acts with my mamas naming Rashid and Rayees who always had a bad eye on me and every now and then torture me and try to abuse me sexually. She said she will not let me marry outside her family so that she can have command over my husband she said "aisa ladka dhoondongi tere liye jo meri juti ke neeche rahe" so that she may torture me in future also.

7. I am not allowed to talk to anyone outside home and nor I have any friends, if someone comes at home I always get bad name with him be it friends of my mama, father or anyone else.

8. My mama once beaten me brutally few months back, my younger brother Zaid was here in the vacations from his hostel he also tried to kill me by pressing my neck but somehow I managed to save my life.

9. I wanted to study further but I was not allowed to study for competition whatever I have studied and did in education I was allowed just to demonstrate in society but now when I have denied and protest against their directions to, marry my mama who is already married and have children I was given beatings and kept hungry. I was made to drink spit and dust.

10. On the instructions of my mama and mother and uncle Lateef my brother Umar beats me and don't let me go anywhere.

11. I am not allowed to sleep on bed where as others sleep on bed I am only allowed to sleep in lobby that too on ground and do household work alone to get food in lieu of that.

12. Whenever they beat me take my phone so that I may not inform anyone. They compel me to compromise they beat me then talk nicely so that I can't expose them after four days again torture me they kept me hungry and

thirsty in a room and harass me by saying now we will call this relative if you don't agree to do this.

13. On 18.09.2018 I asked them that I want to study further or do some job but they clearly denied and I was beaten on the instructions of Lateef my mother slapped me Umar had beaten me my hands were tied with a rope and I was hit on intimate parts by my mother. Asked help from my father but he also did beat me. I was tried to be killed and I sustained injuries by beating and there were many marks on my body also. She said she will not leave me able to marry anyone and they will kill me burn me then bury again get me out again burn me and kill me. I was threatened that they will kill me as they have links with terrorists and no action would be taken as they have connections with police and administration. Lateef, My father mother and mama says this is Kashmir I will be burnt publically.

14. I kept my phone to some place so that they cannot snatch it from me and did mail to police officers. Police reused me in the night of 20.9.2018 and was taken to the social welfare house mattan anantnag.

15. No legal action has been taken so far against them and above that I was pressurized to go home by all.

16. I am seeking help from anywhere and anywhere but not getting help from anywhere.

17. I am not safe in Kashmir as my mama has relations with police officers and they had warned me that they will kill me at anycost.

18. My mother and Lateef said that they will gather people who will give witness against me and they will prove me insane and I will be killed after that.

19. I humbly seek help from this commission to get me out of here and get legal AID to get reused from here.

20. I reported the matter to police and I have been detained here from last 0 days without any action on the culprits as they are moving free.

21. I seek justice and want to go out of Kashmir to lead my free life with dignity. It is very difficult to get any help from here as I am not free to go anywhere and authorities are not taking any action against anyone above that I am facing allegation with anyone who come to my help.

22. I am here at MFM (Nari Niketan) Shalimar, Srinagar but I am also pressurized here by officials to meet my family members against my will.

23. my parents came along with one Ahmed who is an advocate and who also tortured me in the past he shouted at me and said "tujhe ghasit ke nikaloonga yahan se aur D.M. ko bhi ghasit ke laoonga" he said he had kept my phone on tracking and I am not allowed to talk to anyone on phone and he will ask the District Judge(who is friend of Ahmed) to snatch my phone and direct the superintendent of nari nikan (MFM) to let them meet me against my wish. He also gave threat to me that I will be wrongly implicated in some case as these people have contacts with all the officials and judiciary. I have no body to help me here no one is listening to me and justice is a far off thing in Kashmir.

24. Now I am under fear that all the officials are supporting them to just suppress my voice against atrocities which I was subjected to .

25. Yesterday night on the instructions of Ahmed District Judge called superintendent to let these people enter the Nar Niketan and meet me against my wish, such are the manipulations by public officers here. You may

scrutinize the call details of the district judge and superintendent to just know the truth. Kindly bring my matter in notice of High Court of Jammu and Kashmir to take action against that judge also and ask him in what capacity he called personally for the help of culprits and called superintendent of Nari Niketan. Now I am threaten to compromise and go home otherwise I will face dire consequences.

26. All are saying there is no law in Jammu and Kashmir and you have to go home again if you will not go you will be in legal trouble. Kindly help me.

27. My mother is saying the DSP is with us Judge of Anantnag. Judge is also her relative and they will see me and declare me insane. She said they have made report in my family's favor. They are saying who will listen to me when they all are against me.

28. Now I am getting threats that they will ask D.M. to take my phone so that I may not seek help from anyone please intervene in the matter and contact me at earliest so that I may bring all the story in your knowledge to seek justice.

29. Kindly take my request that if my phone will be off and I am unable to be reached at this no. it would mean that my parents have taken my phone.

30. Kindly help me I don't want to be in detention without any fault from last 10 days I am in detention I was rescued from home and detained here. Kindly help me I don't want to be here. this all is in brief I request that I want to tell everything in all detail please help me. Now my mother has called that tehsildar and SSP who is friend of my mama are helping them to deal with this matter and they have kept my phone on tracking so that they may know from where I am seeking help but the truth is they somehow trying to manipulate the matter and give it other shade and trying to harass me on the basis of religion and all and somehow trying to take me home so that they can easily kill me as they say only one person will be under bars by killing you and nobody will be able to know what the truth was. Now I am under protection but even after that my location and whereabouts have been disclosed to them in order to enable them to reach me and threat me again. PLEASE SEND SOMEONE HERE TO MEET ME OR CONTACT ME ON MY PHONE TODAY ITSELF. OTHERWISE THEY WILL KEEP ON FURTHER MANIPULATING THE

MATTER AND KILL ME. Kindly take legal action against these people as soon as possible.

Farah Anjum 8493055215

Detained at NARI NIKETAN MFM, near bsf camp, Shalimar, Srinagar J&K

ANNEXURE P-4

The true copy of the receipt with registration number: 2014110225949 of the complaint letter dated 30.09.2018 received by the Detenu on dated 30.09.2018

Your application has been received by NCW on 30/Sep/2018

02:00:06 has been allotted receipt number:" 2014110225949

Kindly note down the receipt number for future reference.

The file number, user id and password will be provided to you after scrutiny/ approval of your application.

You can check the status of your application whether registered or not by using the given receipt number after 10 days at the following link.

Link:

<http://ncw.nic.in/onlinecomplaintsv2/frmPubLogin.aspx>

ANNEXURE P-6

A true copy of the receipt of the registration with File No.8/C180014155/2018/NCW/SS-AAR/GK of NCW complaint dated 30.09.2018 is dated 3.10.18

From: do-not-reply@nic.in

Date: wed, Oct 3, 2018 at 1:12 PM

Subject: Registration Status

To: <faranjum74@gmail.com>

With reference to receipt no. 2014110225949, it is to inform that your complaint has been registered by the National Commission for Women on Wednesday, October 3, 2018 having Registration/ File No: 8/C180014155/2018/NCW/SS-AAR/GK. Use this complaint Registration/ File No or your future reference. The NCW will process your complaint and take action there on at the earliest.

You may see the status of your complaint online by using the following credentials:

User id: C180014155

Password:ncw\$402410065

You can also contact our Counsellor at the following telephone numbers.

Counsellor: Gurpreet Kaur

Phone No. 011-26944880, 26944883 (514)

Registration desk

National Commission for Women

Plot No. 21, Jasola Institutional Area,

New Delhi-110025

ANNEXURE P-2

True copy of the receipt of the complaint to the Hon'ble Prime Minister through an online portal, "Public Grievance Portal" dated 24.09.2018.

Farah Anjum <faranjum74@gmail.com>

Mon, Sep 24, 2018 at 10:41 AM

Cpgrams-darpg@nic.in <Cpgrams-darpg@nic.in>

To: faranjum74@gmail.com

Dear Sir/ Madam,

Your communication has been registered with the registration number PMOPG/E/2018/0456491. Please visit at: <http://pgportal.gov.in> and click on view status for further details.

Please quote the registration number in your future correspondence.

ANNEXURE P-5

True copy of the Detenue complaint via email to the
Petitioner dated 1.10.2018

Seema bohria <seemabhorialc@gmail.com>

MOST URGENT/SEXUAL HARASSMENT AND TORTURE
INFORMATION IN CONNIVENCE WITH AUTHORITIES ON
THE BASIS OF GENDER AND RELIGION.

Mon, Oct 1, 2018 at 2:13 PM

Farah Anjum faranjum74@gmail.com

To: seemabhorialc@gmail.com

Respected Sir / Mam ,

I Farah Anjum , Age 26 am victim to cruelty , sexual
harassment and torture (physical ,mental) done by
parents ,brothers and relatives naming :-

(i)Mukhtar Ahmed Pahalwan (ii) Quosnar Shamim (iii)
Umar Mukhtar (iv)Raja Zaid r/o H.No.3 S.K.Colony
K.P.Road Anantnag ,J&K

(v) Raees Ahmed Dar (vi) Rashid Ahmed Dar R/o Takiya
Behram shah Distt.Anantnag J&K

(vii) Manzor Ahmed Ganaie (Viii) Mahajabeen R/o Wanpoh
Khudwani Distt. Anantnag J&K

(ix) Mohd. Lateef lulu R/o Lazibal Anantnag J&K

1. I have been sexually harassed and tortured physically as well as mentally by the above naming .

2. I was sexually abused and molested by Manzor Ahmed at a very young age he used to do bad acts with me but I was unaware at that time . Once my Aunty Mahajaben saw this as I was shouting and resisting the bad act of manzor ahmed she didn't took any action in order to save her home . no one raise voice against him because he is a influential man holding good office at Govt.

3. My mother Qouensar Shamim was aware of the incident but she kept silence over the matter and even starting cursing me that I was curse to the family and she insisted that I should be married as soon as possible .

4. My mother is having obsession with god knows what , she tells she is khuda and she have powers as she can see future and do good or bad to anyone.

5. My mother always cursed me and tortured me that I am like a woman who had an affair with my father and she will keep me as a slave. My mother was used to torture me like anything .

I was given allegations with everyman on the account that I am not a good girl as I am curse and I may not prove to be a good daughter , wife , or mother and I don't have any right to lead a normal and happy life. i was not allowed to do nimaaz and my quran was also burnton account that i am bad girl and i pollute where ever i sit and whatever i touch. my mother said I will marry u with father of two chidren so I may not get respect out of my wedlock also . She said that she will take revenge of my father's relation with some other women from me by giving me life of a slave . She says islam permits her to do anything with me as she is a mother and nobody will listen to me and if I will reveal anything to Anyone she will get me killed by her brother who have relation with local police and some terrorists also. I had no option to keep silence and just pray for my marriage or some job to get rid of this torture .

6. They give me allegations with any one no matter I have any relation wt that person or not just to prove me bad at character . Now my mother want me to do bad acts with my mamas naming Rashid and rayees who always had a bad eye on me and every now and then torture me and try to abuse me

sexually . She said she will not let me marry outside her family so that she can have command over my husband she said " aisa ladka dhoondongi tere liye jo meri juti ke neeche rahe " so that she may torture me in future also .

7. I am not allowed to talk to anyone outside home and nor I have any friends ,if someone comes at home I always get bad name with him be it friends of my mama , father or any one else

8. My mama once beaten me brutally few months back , my younger brother zaid was here in the vacations from his hostel he also tried to kill me by pressing my neck but somehow I managed to save my life .

9. I wanted to study further but I was not allowed to study for competition whatever I have studied and did in education I was allowed just to demonstrate in society but now when I have denied and protest against their directions to , marry my mama who is already married and have children I was given beatings and kept hungry. I was made to drink spit and dust .

10. On the instructions of my mama and mother and uncle lateef my brother umar beats me and don't let me go anywhere .

11. I am not allowed to sleep on bed where as others sleep on bed I am only allowed to sleep in lobby that too on ground and do household work alone to get food in lieu of that .

12. Whenever they beat me take my phone so that I may not inform any one . they compel me to compromise they beat me then talk nicely so that i cant expose them aftr 4 dayz again torture me they kept me hungry n thirsty in a room n harass me by saying now we will call this relative if u don't agree to do this

13. On 18.09.2018 I asked them that I want to study further or do some job but they clearly denied and I was beaten on the instructions of lateef my mother slapped me umar had beaten me my hands were tied with a rope and I was hit on intimate parts by my mother .i asked help from my father but he also did beat me . I was tried to be killed and I sustained injuries by beating and there were many marks on my body also. she said she will not leave me able to marry any one and they will kill me burn

me then bury again get me out again burn me and kill me . I was threatened that they will kill me as they have links with terrorists and no action would be taken as they have connections with police and administration . Lateef ,My father mother and mama says this is Kashmir I will be burnt publically . My mother want me to get married to my mama who is already married and have two children.

14. I kept my phone to some place so that they cannot snatch it from me and did mail to police officials . police rescued me in the night of 20.9.2018 and was taken to the social welfare house mattan anantnag .

15. No legal action has been taken so far against them and above that I was pressurized to go home by all .

16. I am seeking help from anywhere and anywhere but not getting help from anywhere.

17. I am not safe in Kashmir as my mama has relations with police officers and they had warned me that they will kill me at anycost.

18. My mother and lateef said that they will gather people who will give witness against me and they will prove me insane and I will be killed after that .

19. I humbly seek help to get resued from here and get my complaint recorded without any influence and in detail. I dont want to be in in J& K and go to some other place in the country .

20. I reported the matter to police and I have been detained here from last 19 days without any action on the culprits as they are moving free . My statement was recorded by tehsildar who also pressurized me and didnot record my satement in full as i said but gave it different sense in addition he said that i dont know how to talk to a magistrate and i have to go home after all this and he will not allow me to go out of state .

21. I seek justice and want to go out of Kashmir to lead my free life with dignity . It is very difficult to get any help from here as I m not free to go anywhere and authorities are not taking any action against anyone above that I am facing allegation with anyone who come to my help.

22. I am here at MFM (Nari Niketan) Shalimar , Srinagar but I am also pressurissed here by officials to meet my family members against my will .

23. My parents came along with one Ahmed who is an advocate and who also tortured me in the past he

shouted at me and said "tujhe ghasit ke nikaloonga yahan se aur D.M. ko bhi ghasit ke laoonga " he said he had kept my phone on tracking and I am not allowed to talk to anyone on phone and he will ask the District Judge(who is friend of ahmed) to snatch my phone and direct the supretendent of nari niketan (MFM) to let them meet me against my wish . he also gave threat to me that I will be wrongly implicated in some case as these people have contacts with all the officials and judiciary. I have no body to help me here no one is listening to me and justice is a far off thing in Kashmir .

24. Now I am under fear that all the officials are supporting them to just suppress my voice against atrocities which I was subjected to .

25. Yesterday night on the instructions of Ahmed District Judge called superintendent to let these people enter the nari niketan and meet me against my wish , such are the manipulations by public officers here . you may scrutinize the call details of the district Judge and superintendent to just know the truth . i want to bring my matter in notice of High court of Jammu and Kashmir to take action against that Judge also and ask him in what capacity

he called personally for the help of culprits and called superintendent of Nari niketan. Now I am threatened to compromise and go home otherwise I will face dire consequences.

26. All are saying there is no law in Jammu and Kashmir and you have to go home again if you will not go u will be in legal trouble. Kindly help me .

27. On 30.09.2018 I was told that Justice Geeta Mittal is coming to Nari niketan i met her and told her in detailed i was asked to give my complaint in writing i did same on 1st Oct and handedover to staff but i am unaware that it reached or not because no action was taken .

28. My mother is saying that DSP is with us Judge of Anantnag. Naib tehsildar is also her relative and they will see me and declare me insane. She said they have made report in my family's favor. They are saying who will listen to me when they all are against me. District judge anantnag namely syed tawqeer ahmad is personally taking interest in this matter i dont know on what basis he is personally calling my parents and also my parents are saying he is with us and u cant do anything.

29. Now I am getting threats that they will ask D.M. to take my phone so that I may not seek help from anyone pls intervene in the matter and contact me at earliest so that I may bring all the story in your knowledge to seek justice .

30. Kindly take my request that if my phone will be off and I am unable to be reached at this no. it would mean that my phone have taken my phone.

31.I dont want to go home at any cost as my life and liberty is under threat their.I Was locked their many times and starved for dayz .I am not allowed to offer my daily prayers and cant even eat at my will.kindly take action and ensure safety of my life and liberty as i am not safe here and want to go at some safe place where i could work and fight for justice .

32. Kindly help me I don't want to be in detention without any fault from last 19 days I m in detention I was rescued from home and detained here . Kindly help me I don't want to be here . this all is in brief I request that I want to tell everything in all detail please help me.Now my mother has caled me that tehsildar and SSP who is friend of ma mama are helping them to deal with this matter and they have kept my phone on tracking so that they may know

from where i m seeking help but the truth is they are some how trying to manipulate the matter and give it other shade and trying to harras me on tge basisi of religion and all and somehow trying to take me home so that they can easily kill me as they say only one person will b under bars by killing you and nobody will be able to know whta the truth was.Noe i m under protection but even after that my location and whereabouts have been disclosed to them in order to enable them to reach me and threat me again.

33. I have been detained here just to pressurize me in order to force me to compromise and without any written order by any authority against my wish. i am major 26 years old post graduate girl and dont need anyone to survive i want to be independent and earn my livelihood myself and live my life with dignity and liberty and send me at place of my wish under protection .

34.Even after the fact that i have denied to meet anybody because i have threat to life by these people,the staff here is constantly intouch with culprits and meeting them i have all the proofs of this.my father is saying that he will exploit me from

everywhere and "ab tabahi hogi " Now , i m getting pressure to withdraw my complaint by my father and one Ahmad umar bhat who have in connivence with police put my phone and whatsapp on tapping and my right to privacy is being voilated.Despite of the fact that i m complinant here my phone and whatsapp are on survilance.I have snapshots of details sent to me in order to pressurize and threat me by Ahmad umar bhat(who has also harrassed me in past) now my life and liberty,right of privacy are being voilated by police and authorities also.they have detained me against my wish and on the directions of my parents and relatives whom i complained against.i want to get out of here as soon as possible and to seek justice.

PLEASE SEND SOMEONE HERE TO MEET ME OR CONTACT ME ON MY PHONE TODAY ITSELF . OTHERWISE THEY WILL KEEP ON FURTHER MANIPULATING THE MATTER AND KILL ME . Kindly take legal action against these people as soon as possible .

Farah Anjum [8493055215](tel:8493055215)

Detained at NARI NIKETRAN MFM, near bsf camp, Shalimar, Srinagar J&K

ANNEXURE P-7

True copy of the email by the Detenue to the Petitioner for grant of permission to represent her in the concerned forum dated 4.10.2018

Thu, Oct 4, 2018 at 3:22 PM

Farah anjum <faranjum74@gmail.com>

To: seemabhorialc@gmail.com

As I have shared and convey u abut each and every thing and nobody here is trust worthy now because everybody here including the police officials are trying to manipulate the things and on the instructions of my family I have been restrained and detained here from past 14 dayz and no action has been taken against the culprits yet and even here also my parents and uncles are visiting on and off to harass me and life threatening threats are being given to me and superintendent is constantly in touch with them and I am not safe here. I cannot get justice here as nobody is helping me out as these people are trying to involve me in false cases and are just trying to supress my voice. Plz I request you being a friend of mine to help me and help me in getting out from here as soon as possible as am not safe here in Kashmir. I am a major and I don't want to be in Kashmir anymore at any cost. I was

molested, thretned, beaten and tried to b killed in my own home I don't want to get back to that home. All are creating pressure on me to compromise the matter no one from administration and police or judiciary is helping me. On the other side they are trying to supress my voice and I don't want to be in Kashmir here any more I want to save my life and liberty. Otherwise I have send you all the details and emails of my complaint to you and I want yoy to help me lefally and file such petition on my behalf to get me put from Kashmir as soon as possible so as to get justice.

Nobody here is trustworthy as I cant trust anyone now and I request your goodself to be my advocate and file my case and take legal actions and save my life and liberty.