

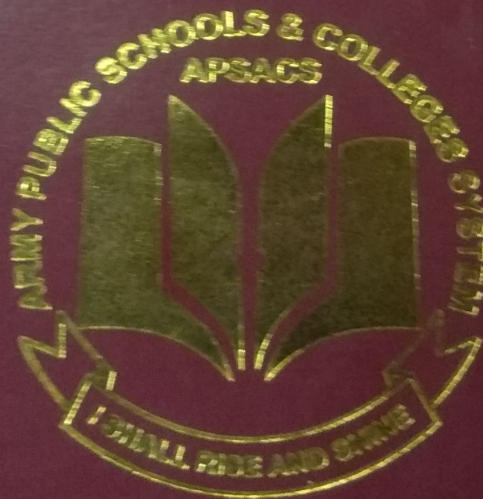
**(REPORT)**  
**COMMISSION**

**ON**

**Army Public School and College**  
**Warsak Road Peshawar**

**(INCIDENT)**

**16<sup>th</sup> December, 2014**



**Justice Mohammad Ibrahim Khan**  
**Judge, Peshawar High Court, Peshawar**



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## Part-IV (Chapter-8)

### Conclusion

Irrefragably our country remained at war with the enemy which carried occult activities and let loose terrorism which hit the highest point in 2013-14 still, this doesn't obligate us to hold that our sensitive installation(s) and soft target(s) could be forsaken as a prey to the terrorists' attack.

The entry of the terrorists from cross-border (Afghanistan) till infiltration into the doomed school's perimeter befooling the security apparatus could be attributed to mainly our porous north-west border and afghan refugees' movement across the border in view of the understanding inter se the government and international agency regarding refugees unrestrained movement. Above all, the assistance provided to the fanatics from the inhabitants of locality, especially in this particular episode, is palpable and so is unpardonable. I can perceive it with utmost honesty that when one's own blood and flesh commit treachery and betrayal, the result would always be devastating. While it diminished and compromised the efforts of our security apparatus made within the available resources on one hand, it augmented and intensified the accomplishment rate of the enemy's nefarious plan on the other. Having said so, no agency; how capable and able in terms of manpower, infrastructure and technology could outperform the impact of any attack effortlessly when infidels are within the inside.

Likewise, among the three layered security protocol i.e. static guards at the outer gates, MVTs (2 in No) patrolling in the vicinity of the APS&C for vigil, QRF destined at a distance of around 10 minutes from APS&C Warsak and Police RRF for response within the Cantonment; one MVT was beguiled towards the smoke erupted from the vehicle set ablaze by the terrorists as part of their plan while leaving the premises of APS&C Warsak unattended. This act alone gave an edge to the militants to break into the premises of APS&C



Warsak from back side where the MVT had to patrol. Though the other MVT responded but wasn't capable to buy the needed time for QRF & RRF to overwhelm the terrorists' attack before it could cause the catastrophe.

The generic threat alert issued by NACTA was in fact attributed to all the academic institutions run by the armed forces with the sole objective to target the army families as retribution for the unstoppable and successful military operations against the terrorists' hideouts particularly, operation Zar-e-Azb and Khyber-1. Accordingly, this laid heavy duty on the shoulders of 11 Corps to operate against terrorists' niches and also defend its positions both soft and hard. Howbeit, the armed forces remained successful in achieving the former goal but the incident of APS plagued their success stories which deserved deification. This fiasco in the security of the institute, from one angle, could be ascribed to; the incomparable number of static guards composing the 1<sup>st</sup> tier of security apparatus to the level of looming threat, their improper position, and accentuating main-gates and front area compromised the security from back-end wherefrom, the terrorists managed entry with no retaliation. Equally, incomprehensible is the inertia on part of the Askari Guards as well as the deputed Static Guards to the initial heavy firing and blasts by terrorists until MVT-2 and QRF arrived. Had they shown a little response and could engage the militants in the very beginning of the attack, the impact of the incident might have been lesser. Nevertheless, movement of the militants towards the adjacent toddlers' block was restricted by valiant soldiers of the MVT-2 and QRF on their arrival under the command of Brigadier 102 HQ 11 Corps, and thus further devastation in that block was foiled. It's pertinent to indicate that the Unit regulating the MVT-1 has been awarded punishment pursuant to the "Court of inquiry", which chapter of the incident shall be discussed in detail later.

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## Part-IV (Chapter-9)

### Collated Grievance II

The complainants/aggrieved people, while calling in question genuineness of the military's operation against the militants, moaned that the operation was considerably delayed because of belated arrival of the SSG Commandoes without any plausible reason whereby the terrorists acquired enough time to accomplish their plan of causing maximum damage in terms of loss of lives of innocent souls. They also recorded their reservation vis-à-vis capacity of the militants to bring huge arms and ammunitions enabling them to engage in fighting till later hours that day. Potent complaint is also made by most of the aggrieved that notwithstanding arrival of the police at the site, they weren't let enter the premises, giving them skewed hope of safety of their children and that how come the combat operation and evacuation activity could be conducted simultaneously.

The foregoing drawn together accusations of the aggrieved and parents of Shuhada are related to armed forces' response to the terrorists' attack. Since, most of the aggrieved had themselves witnessed the tragic event from outside the APS&C Warsak, therefore, while observing the activities of military-men/security agencies, they had formulated their own opinion based on circumstantial and incidental events happened that day. They urged that when terrorists committed massacre in first 15 minutes of the attack; why army, after arrival, couldn't eliminate the militants sooner? Likewise, the reason of continuation of battle from morning till late evening shrouded them in mystery as none could answer them for long till this day of Commission's proceedings. They questioned that how the evacuation of Shuhada/injured/survivors and military operation was conducted in chorus? Thus, while casting



doubt on genuineness of the force's response, they also alleged that the police was not allowed entry into APS&C Warsak notwithstanding that they had reached ahead of armed forces on the day of incident.

Similarly, they complained that on the fateful day, accurate information was not shared with the curious parents who were in utter despair fearing for the safety of their children; as according to them, every cloud has a silver lining, but at the end, they found their kids brutally killed and injured by the terrorists.

While, above interrogatives, collated as grievances in a single item, are only a glimpse of what is alleged before the Commission and an assembled therefore, in order to bring the very assertions of the complainants and parents of Shuhada on record, it would be appropriate to reproduce hereunder, the relevant portion of their statements.

**CW-1**

**Statement of Ajoon Khan S/O Abdul Jalil R/O Mohallah Muhammad Abad Tehkal Bala, University Road District Peshawar on Oath.**



- Why didn't the attackers spread into other area of buildings and only concentrated in auditorium?
- How did they know that the students had gathered in the hall?
- Who told the attackers that the buildings of school and college sections were lying vacant?
- Who told them that students are not in their classrooms and have been brought to the lecture hall?
- Why did the attackers choose the lecture hall located in the centre which is surrounded by other buildings?
- How and who evacuated the injured and the dead bodies just after half an hour when the attackers were still there?
- Why the attackers were friendly towards the rescue party and allowed them to carry out their rescue operation during the attack?



- Why the security forces who's were fully armed and standing just outside the parameter wall not entering the vicinity?
- In fact the security forces made their deployment outside the boundary wall of the vicinity and were providing protection to the terrorists who were playing with the lives of innocent children?
- Why did the security forces allow the attackers to freely wander around in the building up-to 15:00 hrs?

4-7 &amp; 8

**Joint Statement of Mr. Shahab ud Din S/O Ameer Khan and Mst. Rana Gul W/O Shahab-ud-Din, (Husband & Wife) R/O City Town, Haji Camp, Peshawar on Oath.**

"We wonder how they identified our Shaheed son in a chaotic situation in the school on the eventful day who had not taken along his identity card and glasses that day. We are also amazed that how the SSG Commandoes and army personnel could avoid receiving injuries amidst terrifying operation wherein, on one hand the students were constantly falling prey to terrorists' atrocities while the other they were rescued."

"We are suspicious about the story of the occurrence as spelt by the Army side from day one as we were shown only one side of the picture. There was heavy use of arms and ammunitions in the incident but it was never disclosed that how these were taken inside. The vehicle reportedly burnt by the terrorists was never shown to us. The media was allowed entry after 24 hours which displayed that the entire building had been devastated. It was alleged that someone from inside the school had been the accomplice but none was either shown or taken to the task making him/them accused least in the case registered of the event"



4-7-9

**Statement of Misal Khan S/O Habib Khan R/O village Suliman Khel Mohallah Khan Khel Post Office Badaber, Peshawar on Oath.**

"The attack continued till late hours of the day while the army personnel deputed at security were neither allowing the public nor the policemen to enter into the school to rescue the children. They told that the SSG were to arrive from Tarbella to control the situation and make the rescue operation. Either they were told by the then Chief of Army Staff or the then Corps Commander, Peshawar to let the terrorists achieve their target and not to allow anybody to control the situation. Had we been allowed to enter the school we could have saved the lives of many."



4-10

**Statement of Mehboob ur Rehman S/O Musa Muhammad R/O Kabal Swat on Oath.**

"I produce the USB containing Video clips and images regarding occurrence collected from the internet which is Ex. CW-10/1(Sandisk 16GB black in colour with both computer and





mobile ports). The images and videos available in the USB may help this Commission to reach to the real facts of the occurrence. To my utter surprise, an unknown person was making a video and taking images during such terrible and chaotic situation.”

11

**Tariq Jan S/O Samiullah Khan R/O Turangzai, Charsadda presently at Warsak Road, Peshawar, on Oath.**

“Sixthly, according to my information received from different corners my sons fell prey to target killing during the incident because of the delayed operation.”



13

**Statement of Abid Raza Bangash S/O Muhammad Rafique Bangash R/O House No. 2236, Road-B Abu Bakar Block, Phase-8, Behria Town, Rawalpindi on Oath.**

7. “Where was the QRF at the time of occurrence?”
9. “Why the police were not allowed to enter the school soon after the occurrence and instead the army deputed there waited for the arrival of commandoes from Mangla?”
10. “Why did the Commandoes reach so late to school so as to control the situation and rescue the victims?”
11. “How much time was taken by the terrorists in completing their attack as I was told by the then Corps Commander Lt. Gen. Hidayat-ur-Rehman that they took 15 minutes which I cannot agree with?”
12. “Why was the rescue operation of Shuhada and injured so much delayed?”
13. “How did the terrorists manage to go to 2nd floor where the students of 2nd year were attending exams and then returned there-from to the auditorium?”
14. “Why did the security officials fail to respond to the situation quickly?”



14

**Statement of Gul Shahzad Khan S/O Abdullah Khan R/O Peshawar Public School & College, Warsak Road, Peshawar on Oath.**

9. “Though it was claimed by the then Corps Commander Lt. Gen. Hidayatur Rehman that the terrorists had been killed in fifteen minutes time, then how could firing and blasting continue till late hours that day?”
10. “What was being done by the QRF at the time of occurrence when innocent children and staff members were mercilessly killed?”
11. “What prompted the Army Authorities to call commandoes from Tarbela for operation in the school





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**CW-11**

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**CW-13**

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**CW-14**

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9. "Though it was claimed by the then Corps Commander Lt. Gen. Hidayatur Rehman that the terrorists had been killed in fifteen minutes time, then how could firing and blasting continue till late hours that day?"
10. "What was being done by the QRF at the time of occurrence when innocent children and staff members were mercilessly killed?"
11. "What prompted the Army Authorities to call commandoes from Tarbela for operation in the school?"





when it was situated in the Red Zone surrounded by huge army installation?"

12. "Why was the rescue operation commenced so late, due to which many students lost their lives owing to non-provision of in time medical aid?"

**CW-15**

**Statement of Muhammad Arif S/O Abdul Ghani R/O Tehkal Payan Mohallah Gujarano Kandy, Near Defence Colony, Peshawar on Oath.**

"During the attack, neither the police nor the parents/public were allowed to enter the school in order to rescue the innocents however, to my utter surprise, the ambulances and the army personnel were allowed entry to collect the dead bodies/injured despite the presence of attackers. I strongly believe that the attackers were in league of army therefore, they were given smooth access."



**CW-16**

**Statement of Muhammad Aslam Qureshi S/O Muhammad Ayub Qureshi R/O House NO. 1429, Mohallah Abubakar Sadiq near Masjid Abubakar Sadiq, Sheikh Abad No.2, Peshawar on Oath.**

"On the fateful day, no one was allowed entry into the APS while considerable time had consumed in taking the injured to the hospital due to which many injured succumbed to injuries due to lack of on time medical treatment. I seriously doubt the response of Armed Forces towards the operation."



**F-20 & 21**

**Joint statement of Tehseenullah S/O Habibullah and Mst. Falak Niaz wife of Tehseenullah both R/O Fauji Foundation Hospital, Aziz Shaheed Road, Peshawar Cantt on Oath.**

"It is also amazing that on one hand the terrorists continued killings of innocent students while on the other, the army officials available on the main gate were securing the interest of terrorists by not taking action themselves nor allowing the parents, police or anybody else who could be able to save the lives of innocent children. So much so, one Altaf Shaheed of Engineer Battalion who could dare to come and fight with terrorist, was killed and later on Court Marshal for fighting with the terrorist, however his sentence at Court Marshal was withdrawn because of pressure for doing wrong on their part. It is also surprising that the terrorist were killing the innocent children and the Army official instead with fighting with them, were collecting the dead bodies that too in the indiscriminate firing without having simple single injury to their body. I, the father of the Shuhada, had made access to the auditorium at about 12:30 PM where I only found 5/6 dead bodies of higher grade students lying unattended but could not find my sons. I also did not observe the presence of terrorists. The Army halted entry of the police and parents of the students into the school





with the excuse that commando were to reach to the school from Tarbela while the security officials were mere spectators.”

**CW-36**

**Statement of Muhammad Iqbal S/O Sardar-e-Azam R/O Outside Yakatoot, Muhalla Shadbagh Colony, Peshawar on Oath.**



“My sole query before this Commission is that how I obtained the dead body of my Shaheed son at 01.00 PM while the operation continued thereafter and ended at 05.30 PM who was carrying these dead bodies, who was conveying/transporting these and how the rescue operation was carried out simultaneously with attack of terrorists.”

“Questions like above were on the tongue of all the bereaved individuals who approached the Commission for recording statement. I admit that it would be a day like “heaven falling down” for those who had their loved ones at the APS on the fateful day. Imagine the feelings of parents who would brought up their children with immense love and care; who sent their child to school for studies and amidst, they are informed that the center of education was infact converted into a battle field where the apple of their eye will embrace shahadat unguarded. Parents crying to their hearts’ out and with no sense of directions and situation kept roaming on one false direction after another.”

“Everyone had sky high expectation that our armed forces would not only respond in time but will also extirpate the terrorists in the but this time, the imagination went totally wrong. The nightmare was so horrible that I firmly believe that neither nation nor Armed forces were ready to expect and combat the situation. The terrorists had really planned to the nerves and they were able to tactfully overcome the blockades.”

“However, the response the response to the terrorists attack was not as seen, believed and portrayed above. The representative of MOD on oath confirmed that the operation was led faithfully and daringly. Detail of the operation is already explained in detail while discussing the modus-operandi as explained during the briefing by Brig. Shakir from Step-I to step-VII.”

**CW-45**

**Statement of Sharif Gul S/O Shahzad Gul R/O House No:14, Alhafiz Colony, Ring Road Dalazak Road Chowk(Shaheed Alam Zeb Chowk)Peshawar on Oath.**



ii. “Why the police was not allowed entry to respond and rescue the situation?”

iii. “Why commandoes were brought from a far-away place which consumed unreasonable time as a result of which many innocent lives were let lost? Thus, the army has itself violated the norms of “A stitch in time saves nine”



CW-53

**Statement of Hussain Nawab S/O Mujahidin R/O Sindano Kouper, P.O Ghani Dheri, Tehsil Dargai, District Malakand on Oath.**

1. "Why the police was not allowed to enter the school to cope with the terrorists?"
2. "Why the Army reached so late to rescue the situation which resulted in to the huge loss of lives of innocent students etc?"



CW-59

**Statement of Rashid Ali Khan S/O Dilawar Khan R/O House No 31, Street No 4, Defence Officer Colony Peshawar Cantt on Oath.**

8. "Though it was claimed by the then Corps Commander Lt. Gen. Hidayatur Rehman that the terrorists had been killed in fifteen minutes time, then how could firing and blasting continue till late hours that day?"
9. "Why the rescue operation was started so late? Had it been started well in time, many innocent lives could be saved?"



CW-61

**Statement of Salman Ahmad S/O Ali Ahmad Jan R/O House No 110/232 New Defense Housing Colony Shami Road Peshawar on Oath.**

8. "Why the rescue operation was started so late? Had it been started well in time, many innocent lives could be saved?"
9. "Why the parents/public available at the outer gate of APS was not allowed to enter and rescue the students when the operation was allegedly concluded in 15 minutes?"
10. "Why the police who had come to rescue was not allowed to enter and rescue the students?"



CW-63

**Statement of Amjad Suhail S/O Agha Muhammad R/O House No 1421, Chowk Sikandarpura, Peshawar City on Oath.**

3. "Why the rescue operation was started so late? Had it been started well in time, many innocent lives could be saved?"



CW-71

**Statement of Aurangzeb Khan S/O Muhammad Amin Jan R/O House No. 1, Hassan Zeb Shaheed, Amin Jan Road, 27 the Mall Road, Peshawar Cantt on Oath.**

"Hassan Zaib was hit with a single bullet shot on his buttock and was survived at the first instance but due to delay in first aid, he



## Part-IV (Chapter-26)

### Last words

I would not hesitate to reiterate that the anguish, endured by the bereaved families, is beyond possible stretch of human imagination. The incident of 16<sup>th</sup> December, 2019 is not only a painful and unfortunate event in their lives but it was a horrendous act which jolted every citizen of our beloved land.

Efforts of our armed forces to console and placate the agonies of parents of Shuhada and other victims are worthwhile comparing to the pains taken by such institution in tragedies of this magnitude elsewhere in the world. Undoubtedly there is a clandestine and somewhere failing agreement of views of the aggrieved/complainants relating to the incident but, it is most probably because of the communication gap between them and the military which I believe must have abridged in due course of the proceedings before this Commission.

We, as a nation, are proud of and pay salute to the innocent flesh and blood/our sons and daughters who embraced *Shahadat* in the tragic incident of 16<sup>th</sup> December, 2014. We acknowledge them to be the real heroes of our motherland. We also pay and extend tribute and honour to the victim families who went passed this misery with unity and perseverance. We are cognizant of the sufferings of the injured also who deserve similar homage, for they still live with inerasable horrifying memories. We and our generation to come shall remain indebted to this unparalleled sacrifice of our national heroes whose pure blood was not let spilled in-vain as every drop of their blood contributed to bringing back peace and solidarity to the land.



I, as a Commission, will be failing in my duty if, I don't mention the role of Pakistan Military both in uprooting the menace of terrorism from our soil after the incident and for their unflinching support to the victim families. Our Armed Forces have demonstrated valor and endurance throughout their fight against the peril. The bereaved families and armed forces are two limbs of the same body, the grievances and outcry of the former could be attributed to multilateral factors discussed in detail in the preceding chapters however, looking at them from national angle let alone our Islamic views, they both are one and same family. No external force, how high or powerful it could be, can intrude and dilute this sacred relationship between the citizens of Pakistan including the bereaved families and our Armed Forces. It is apt to highlight that many siblings of the Shuhada and injured are still studying in Army Public School & College, Warsak which fact alone is sufficient to denote sheer trust of the parents of Shuhada/Aggrieved in the institution run by Pakistan Army.

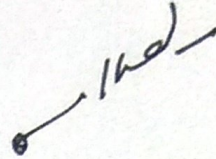
Before parting, I once again reiterate that the bereaved families, the next-to-kin of *Shuhada*, the injured, staff members/students/Army personals and other victims of the incident deserve exceptional treatment. With this view, it is incumbent upon all the limbs of the state to ensure an environment of honour and reverence to each victim family to live a respectable and dignified life in society.

With the above observations, and because of incessant pursuit of peace in our beloved land and homage to the wretched families being close to my heart, I prefer to share my heartfelt feelings in the following poetics verses: -

کاش امن کا گہوارہ ہو وطن میرا اے خدا  
دشمن کی میلی نظروں سے اے ہمیشہ بچا اے خدا  
جتنے بھی ہوے شہید ماؤں کے چراغ اس دھرتی پر  
ان ماؤں کے دلوں میں چراغ صبر جلا اے خدا



May ALLAH bless Pakistan with serenity and protect us  
all, Aameen, Ya Rabbul-Āla'min.

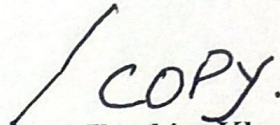


**Mohammad Ibrahim Khan**  
Judge Peshawar High Court  
Commission for APS Incident

Friday, 26<sup>th</sup> June, 2020

**Certificate**

It is certified that the instant report consists of 525 pages,  
each page whereof has been duly signed by me.



**Mohammad Ibrahim Khan**  
Judge Peshawar High Court  
Commission for APS Incident  
Friday, 26<sup>th</sup> June, 2020