


21.06.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General requested for time to submit reply/comments. Last opportunity is extended till the next date, In case, the respondents failed to submit reply/comments on the next date, their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for reply/comments on 29.07.2022 before S.B.



(Mian Muhammad)  
Member (E)

03.01.2022

Counsel for the appellant present. Preliminary arguments heard. Record perused.

Appellant Deposited  
Security & Process Fee

10/01/22

Points raised need consideration. The appeal is admitted for hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments 10.03.2022 before the S.B.

(Rozina Rehman)  
Member (J)

10.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 30.05.2022 for the same as before.

Reader.

30<sup>th</sup> May, 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General respondents present.

Written reply/comments not submitted. Learned AAG seeks time to submit written reply/comments on the next date. Granted but as a last chance. To come up for written reply/comments on 21.06.2022 before the S.B.

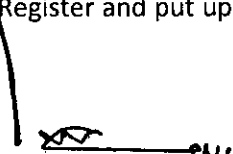

(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_


Case No.- 7730 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2021	<p>The appeal of Mr. Asfandyar resubmitted today by Mr. Taimur Ali Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>03/01/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal resubmitted today is incomplete which is returned again to counsel for the appellant with the remarks that some text are missing in annexures-C, D & E, more over the annexures of the appeal are unattested. Furthermore check list is not properly filled. The entire objection be completed and appeal may be resubmitted within 15 days.

No. 2198 /S.T,

Dt. 03/11 /2021


  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Ali Khan Adv. Pesh.

Respected Sir,

That annexure-C & D were provided to the appellant through application by the dept. and he annexed that with the appeal, while Annex-E is completed.

Resubmitted after compliance

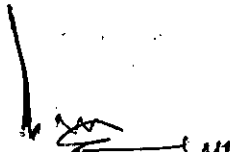
  
5/11/2021.

The appeal of Mr. Asfandyar, Ex-Constable No. 1353, R/O Kaghazai P.S Cantt, District Kohat received today i.e. on 20.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Check list is not attached with the appeal.
2. Index of the appeal is incomplete.
3. Appeal has not been flagged/marked with annexures marks.
4. Charge Sheet mentioned in para-3, annexed as Annexure A is not attached with the appeal.
5. Annexures of the appeal may be attested.
6. Annexures are not in sequence.
7. Certificate given to the effect that the appellant has not been filed any service appeal earlier on the subject matter before this Tribunal is not signed by the appellant.
8. Departmental inquiry, Final show cause notice, Reply and impugned Order dated 30/12/2020 attached with the appeal are illegible which may be replaced by legible/better one.
9. Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2085 /S.T,

Dt. 20/10 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Ali Khan Adv. Pesh.

Respected Sir.

1- Removed

2- Removed

3- Removed

4- charge sheet has not kept by the appellant and unable to annex with the appeal.

5- Removed

6- Annexures are place in sequence.

7- Removed

8- Departmental ~~appeal~~ inquiry, Final show cause notice and order dated 30/12/2020 are replace by legible copies.

9- Removed

Resubmitted after compliance  
2/11/21  


**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

SERVICE APPEAL NO. 7730 /2021

Asfandyar

V/S

Police Deptt:

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**INDEX**

S. No.	Documents	Annexure	P. No.
01.	Memo of appeal	-----	01-04
02.	Affidavit	-----	05
03.	Copy of FIR	A	06-07
04.	Copy of letter dated 11.10.2021 and inquiry report	B&C	08-10
05.	Copies of show cause notice and reply to show cause notice	D&E	11-13
06.	Copy of order dated 30.12.2021 and departmental appeal	F&G	14-16
07.	Copies of bailout order dated 04.06.2021, rejection order dated 25.02.2021 and revision	H,I&J	17-24
08.	Vakalat Nama	-----	25

APPELLANT

THROUGH:



(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT

Room No. FR 8, 4<sup>th</sup> Floor,  
Bilour plaza, Peshawar cantt:  
Cell# 0333-9390916

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

SERVICE APPEAL NO. \_\_\_\_\_/2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7758

Dated 20/10/2021

Asfandyar, Ex-Constable No. 1353,  
R/O Kaghazai P.S Cantt, Kohat.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Kohat Region Kohat.
3. The District Police Officer, Kohat.

(RESPONDENTS)

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APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 30.12.2020; WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE AND AGAINST THE ORDER DATED 25.02.2021, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS AND AGAINST NOT TAKING ACTION ON THE REVISION OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

Filed to-day

Registrar

20/10/2021

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 30.12.2020 AND 25.02.2021 MAY KINDLY BE SET ASIDE AND THE RESPONDENTS MAY FURTHER BE DIRECTED TO REINSTATE THE APPELLANT INTO HIS SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWTH:**

**FACTS:**

1. That the appellant joined the department in the year 2009 and since his appointment, the appellant has performed his duty with great devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performance.
2. That the appellant was falsely implicated in criminal case vide FIR No.1226 dated 08.11.2020 u/s 302,324,148,149 PPC, 15AA PS Cantt. The appellant was arrested in the said FIR and was behind the bar. **(Copy of FIR is attached as Annexure-A)**
3. That as the appellant was behind the bar, therefore, charge sheet along with statements of allegations were served to the appellant through Superintendent, central Prison Kohat, which was replied by the appellant in which he denied the allegations, however he did not keep the copy of charge sheet and reply to charge sheet, which may be requisite from the department.
4. That on the basis of above criminal case, one sided inquiry was conducted against the appellant as the appellant was behind the bar and was never associated with the inquiry proceeding. Neither statements were recorded in the presence of the appellant or gave him opportunity of cross examination, but despite that the inquiry officer hold the appellant responsible, even the inquiry report was not provided to the appellant along with show cause notice and later on provided to appellant on 11.10.2021 through an application. **(Copies letter dated 11.10.2021 and inquiry report are attached as Annexure-B&C)**
5. That show cause notice was issued to the appellant in jail which was properly replied by the appellant in which he again denied the allegations and raised objection on the inquiry proceeding. **(Copies of show cause notice and reply to show cause notice are attached as Annexure-D&E)**
6. That the appellant was dismissed from service on the basis of above mentioned falsely implicated criminal case vide order dated 30.12.2020 against which he filed departmental appeal from jail on 28.01.2021. **(Copies order dated 30.12.2020 and departmental appeal are attached as Annexure-F&G)**
7. That the bail petition of the appellant was allowed on 04.06.2021 by the Honourable Peshawar High Court Peshawar and after release from



jail, the appellant asked about the fate his departmental appeal he was informed that his departmental appeal was rejected on 25.02.2021 and handed over the copy of departmental appeal. The appellant then filed revision on 08.06.2021 which was not responded within the statutory period of ninety days. (Copies of bailout order dated 04.06.2021, rejection order dated 25.02.2021 and revision are attached as Annexure-I, I&J)

8. That the appellant has no other remedy except to file the instant service appeal in this Honourable Tribunal on the following grounds amongst others.

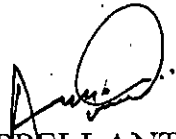
**GROUND:**

- A. That the impugned orders dated 30.12.2020, 25.02.2021 and against not taking action on the revision of the appellant within the statutory period are against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B. That one sided inquiry was conducted against the appellant as the appellant was behind the bar at the time of inquiry proceeding and was never associated with the inquiry proceeding. Neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination which is violation of law and rules and the impugned orders are liable to be set aside on this ground alone.
- C. That no opportunity of defence was provided to the appellant during inquiry proceeding, which is violation of Article-10A of the Constitution of Pakistan.
- D. That the appellant was falsely implicated in criminal case and as per Civil Service Regulations, 194, the appellant should be suspended till the criminal case pending against him, but the appellant was dismissed from service without waiting to conclusion of criminal case pending against him, which is violation of CSR, 194.
- E. That as per superior court judgment that mere allegation of commission of an offence and registration of FIR against a person would not ipso facto made him guilty rather he would be presumed to be innocent until convicted by a competent court, but the appellant was dismissed from service merely on the basis of FIR, which is against the norms of justice and violation of Superior court judgment.

F. That the appellant has been condemned unheard and has not been treated according to law and rules.

G. That the appellant seeks permission of this Honourable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.



APPELLANT

Asfandyar

THROUGH:

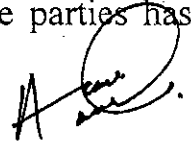


(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT

**CERTIFICATE:**

It is certified that no other similar service appeal between the parties has been filed earlier.



DEPONENT

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

SERVICE APPEAL NO. \_\_\_\_\_/2021

Asfandyar

V/S

Police Deptt:

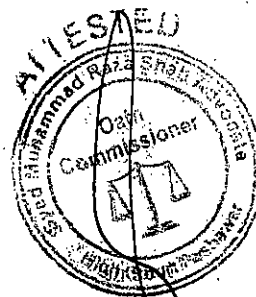
**AFFIDAVIT**

I, Asfandyar Ex-Constable No. 1353, R/O Kaghazai P.S cantt Kohat, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this august Court.



DEPONENT

**Asfandyar**  
(APPELLANT)



# ابتدائی اطلاعی رپورٹ

نومبر ۲۲ء ۱۹۵۰ (۱)

مددگار نمبر ۱۴۳۰۱-۲۰۳۱۷۶۹-۷  
۰۳۰۰-۹۱۵۲۸۷۹

ابتدائی اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شروع شدہ ریفورم ۱۵۲ مجموعہ منایط فیویری

منسلح کوحادث

تاریخ درخت وقوعہ ٹورنہ ۸<sup>۱۱</sup>/<sub>۲۰</sub> وقت ۰۵:۳۰ بجے

تاریخ وقت رپورٹ مورخہ ۸<sup>۱۱</sup>/<sub>۲۰</sub> وقت ۰۱:۳۰ بجے چاکیدگی پرچہ مورخہ ۸<sup>۱۱</sup>/<sub>۲۰</sub> وقت ۰۲:۴۰ بجے

سیکریٹ اطلاع دہندہ و مستفید میرزا علی خان ولد حسین غلام سکنہ کاغذی

مجرم کیفیت مجرم (موجودہ) حال اگر کچھ یا گیا ہو 302-324-148-1445AA

جائے وقوعہ نامہ تھانہ سے ادریسیت خانہ مجاہد واقع تنگی کاغذی تحصیلہ 7/8 ملوٹر جانب مغرب ادریسیت

سیکریٹ بلز ۵ مجاہد ولد راج محلہ ذیل ولد شاہ نواز رقی اسفند یار ولد طور گل رقی استیرو ولد رسول خان

کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو اور توجہ بیان کرو۔

برائے سیدگی جراثیم بطور مشعل رپورٹ پرچہ دیا جاتا ہے سالانہ کاغذی

تھانہ سے رداگی کی تاریخ و وقت

## بطور مشعل رپورٹ

ابتدائی اطلاع مجھے درج کرو اس وقت ایک تحریری مراسلہ صاحب

قسمت ضلع SHO بدست کا عدوان 1222 بطور مشعل رپورٹ موصول ہو کر درج ذیل ہے۔

مجرم تھانہ وقوعہ کی اطلاع ملنے پر میرزا علی خان کے موقع واردات پر آ گیا موقع

میرزا علی خان کے تعلق سے تفتیش ہوتی ہے ۱ قبیلہ محمدی نیاز محمد خان پسران میرزا علی خان رقی جنید خان

ولد خالد محمود رقی قاسم الرحمن ولد سیف الرحمن سالکان کاغذی ۵ عبد الرحمن ولد

رضیت اللہ شاہ سکنہ ماڈرن پراجیکٹان محمدی حال کاغذی موجود ہے جبکہ تین مجرمین

بھتیان نے جاہان بیان ہوئے تھے مقبولین موقع پر میرزا علی خان ولد حسین غلام سکنہ لبر 77

سال سکنہ کاغذی 7-14301-2031769-0300-9152879 رپورٹ کرتا ہے کہ

میرزا علی خان ولد رسول خان سکنہ دیہ ام کی شادی تھی جس نے جائے وقوعہ پر مختلف موسیقی

کا پروگرام کر کے خواجہ سرا لائے تھے۔ فضل موسیقی کیلئے پسران ام ۱ قبیلہ محمدی نیاز محمد خان

صید خان و دیگر ریشم داران ام اور اہلیان دیہ شریہ ہے۔ وقوعہ کی اطلاع ملنے پر موقع پر آ گیا

موقع پر آ گیا کہ موقع پر آ گیا ۵ خواجہ سرا لائے تھے ۲ ذیل ولد شاہ نواز ۳ اسفند یار

ولد طور گل رقی استیرو ولد رسول خان سالکان کاغذی نے پسران ام ۱ قبیلہ محمدی نیاز محمد خان

بدرالہ اسلم آئین مائیک کر کے ہتکے مائیک سے پسران ام ۱ قبیلہ محمدی نیاز محمد خان

بھیا ام ۳ صید خان ولد خالد محمود اور اہلیان دیہ ۴ قاسم الرحمن ولد سیف الرحمن سالکان

کاغذی رقی عبد الرحمن ولد رضیت اللہ شاہ سکنہ ماڈرن پراجیکٹان محمدی حال کاغذی تک مجموعہ

پر جان بحق ہو گئے ہیں۔ وجہ اطلاع یہ ہے کہ تقریباً ایک ماہ قبل اہل تحصیلہ سکنہ دیہ ام کے

بے عظمت خان کی شادی کی تھی موسیقی میں پسران ام سز کردہ بالا اور حنا مان بالا کے پاس

تکڑا ہوا تھا اور پسران ام کو باقاعدہ دھکی دی تھی کہ اگر نہیں موقع ملے تو اب لوگوں کو انجام

یاد ہو کر پڑھ کر سنایا سمجھایا گیا۔ دست تسلیم کر کے ذہن پر اور اس خود دستخط  
 لکھ لیا گیا ہوں۔ ایورٹ کی ٹائید طارق محمود نے کی دوران ہیڈنگ پر کار  
 ① عبدالرحمن سے ایف بی لسنوں 30 یور بلائید ٹیکس، سپر چارج 30 عدد  
 یور 30 یور کاش کینڈا برنگ فٹ ② جنید خان سے ایف بی لسنوں 30 یور  
 لپیٹا، ③ ضمیر محمود سے ایک کاش برنگ مشد پھری ایک چارج مولا 11  
 30 یور ④ نیاز محمد خان سے ایف بی لسنوں 30 یور سیٹ 1345 ٹیکس چارج  
 کینڈا برنگ فٹ مولا 4 عدد کاروں سے 30 یور سیٹ ہو کر ہونے فرد صرف  
 یولس کی ہر پانچ لفو فنولس نے کاغذوں کو بیار کے لکھنؤ یوسٹ مارم  
 ذہن حفاظت کینبل و جاہت حسین 1321 جمع کاروں پر نگرانی محمد نواز ای  
 سرکاری کاروں میں KDA حسنیال اوائلی کے محمد حسین نے لکھنؤ ہر مرتب کرنے  
 لیدر محمد خان Hc کو اطلاع دی گئی۔ یور ایورٹ میں صورت چہ آتا ہے یاچی  
 ہے دراصل لکھنؤ عالی مقدم لکھنؤ سٹیل ایورٹ بدست کاروں 1126 ارسال کیا ہے  
 بعد ازاں مقدم تفتیش حوالہ HBI سٹاف ہونے دستخط انگریزی قیمت خان SHC  
 کھانہ کینٹ فورم 8 11/20 کاروائی کھانہ آملوہ سہل صرف بہ صرف در 2 باہر ہور  
 لیدر حکم آ باہر جان ہو کر نقل لیدر چہ لکھنؤ سہل لکھنؤ تفتیش حوالہ KBI  
 سٹاف لکھنؤ آتا ہے لیدر لکھنؤ سٹیل ایورٹ گزارش ہے

علی خان  
 SI-PS-cantt  
 8-11-20

دستخط  
 علی



B 8

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. S/ 3853 /21, dated Peshawar the 11/10 2021.

To : The Deputy Superintendent of Police,  
PAS, CPO Peshawar.

Subject: REQUEST FOR PROVISION OF PHOTOCOPY OF ENQUIRY  
REPORT VIDE FIR NO. 1226/2020 U/S 3302/324/248/249-PPC P.S  
CANTT KOHAT.

Memo:

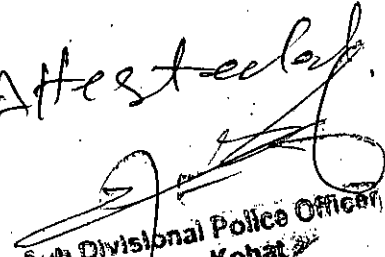
Please refer to your office letter No. 4402-3/CPO/IAB/PAS, dated 04.10.2021  
on the subject cited above.

Photocopies of Show Cause Notice, Charge sheet and final enquiry report in  
respect of Ex-FC Asfand Yar No. 1353 <sup>and Amshid 813</sup> of Kohat district are sent herewith as desired please.

  
(NOOR AFGHAN)

Registrar,

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

  
Attested

Sub Divisional Police Officer  
HQrs: Kohat

11/10

enquiry officer vide order of enquiry bearing number 11.11.2020; to ascertain the alleged charge of misconduct on the part of above mentioned Constable with the following allegations; -

- i. **You while posted at PS MRS has been charged in case FIR No. 1226 dated 08.11.2020 u/s 302,324,148,149 PPC, 15 AA PS Cantt, which is gross misconduct on your part.**

The undersigned conducted an enquiry to find out the actual facts regarding the above mentioned allegations.

For scrutinizing the conduct of defaulter Constable Asfandyar No 1353 was served with charged sheet and summary of allegations. he was summoned for personal hearing, recorded his statement, in his written reply of charge sheet and summary of allegations, he defended himself innocence. He stated reason that regarding the allegation, on 08.11.2020 his cousin Amshid getting married and during the music faction in their village some vagabonds/ unknown person started firing, resultant he and his uncle got injuries. He was charged case FIR No. 1226 dated 08.11.2020 u/s 302/324/148/149/15 AA PPC Cantt. He further stated in his written statement that he and his father namely Tor Gul with uncle also injured in occurrence. His father reported to the local police station cantt: where case FIR No. 1228 dated 09.11.2020 322/148/149 PS Cantt was registered.

During the inquiry to determine facts. In the regard the following concerns were properly summon for record their statement and interview. O.II Police Station Cantt, SHO Cantt Qismat Khan and DSB (charge District Kohat. All the concerned of the case were heard in person and their statements were recorded (placed in file for ready reference). SHO concern and O.II written statements supported the version of case FIR No. 1226 dated 08.11.2020 u/s 302/324/148/149/15 AA PPC Cantt and FIR No. 1228 dated 09.11.2020 322/148/149 PS Cantt (Which is already placed in inquiry file)

Further that the concern branches OHC /SRC also summoned to furnish the detail service record of above defaulter constable (copy annexed) according to the service record report, the said defaulter served with show cause notice due to, used smoke hashish and absentee, announced punished leave without pay on absentee and censure.

In the instant case, defaulter constable Asfandyar got BBA from the concern court which later on, withdrawn by the court on 24.11.2020 and confined District Jail Kohat. O.II SI Rizwan Khan thoroughly interviewed who presented a comprehensive report regarding the above mentioned FIR. Report / statement of O.II shows that defaulter constable Asfandyar cousin constable Amshid No.813 getting married where he was present and Constable Amshid was also present at the wedding and dance program began, it was a spectacle of transgender people. The people who killed in the program, were also present. Case FIR No. 1226 dated 08.11.2020 u/s.302/324/148/149/15 AA PPC Cantt on the report of Miza Ali Khan s/o Ghulam Hussain r/o Kaghzai Kohat and second FIR registered on the report of Asfandyar father namely Tor Gul. The investigation officer said that there are cross FIRs registered in the Police Station Cantt. Beside, when the occurrence took place, defaulter Constable Asfandyar No. 1353 and Amshid No. 813 were also present at wedding / spectacle of transgender program which seems their embroil, hence

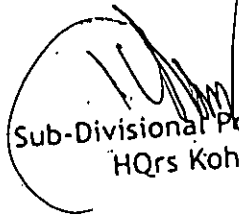
punishment please.

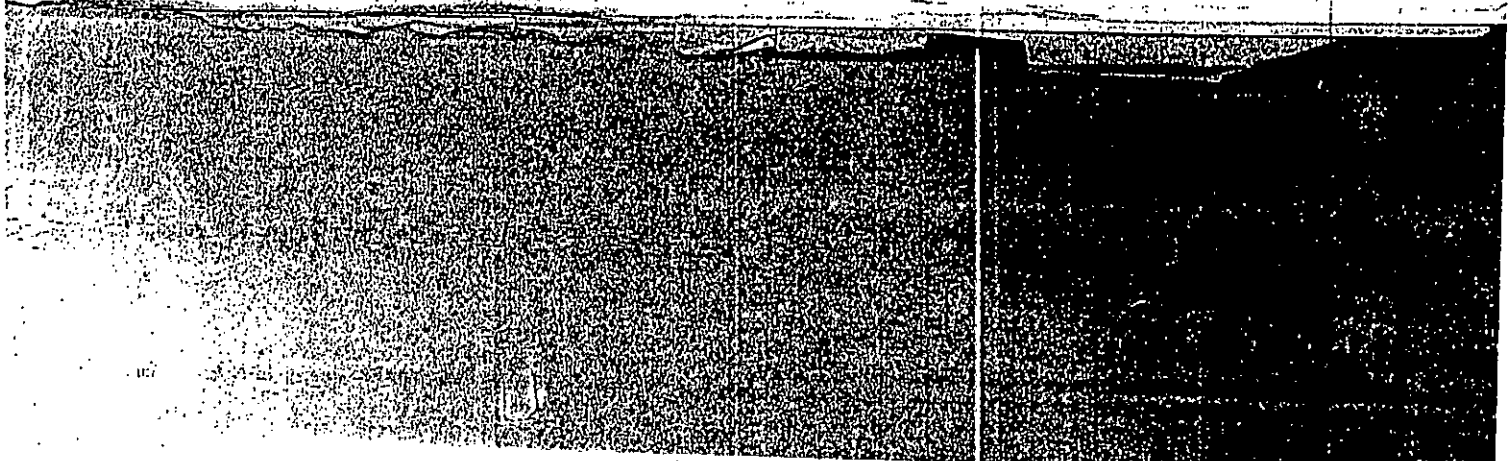
Inquiry report is enclosed with all relevant documents submitted for favour of perusal please.

(Enclosure *17 copies*)

No 742 /PA-Reader Dated 15.12.2020

(10)

  
Sub-Divisional Police Officer,  
HQrs Kohat





authority, under the [unclear] -  
014) is hereby serve you, Constable Aslanuya

That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 5664-65/PA dated 11.11.2020.

On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.

I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

*You while posted at PS MRS has been charged in case FIR No. 1226 dated 08.11.2020 u/s 302, 324, 148, 149 PPC, 15 AA PS Cantt, which gross misconduct on your part.*

As a result thereof, I, as competent authority, have decided to impose upon you major penalty provided under the said.

You are, therefore, required to show cause as to why the said penalty should not be imposed upon you also intimate whether you desire to be heard in person.

If no reply to this notice is received within 07 days of its issue in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

The copy of the finding of inquiry officer is enclosed.

  
DISTRICT POLICE OFFICER,  
KOHAT 16/12

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11

جواب آخری نوٹس اظہار وجود

جواب - عالی

جواب آخری نوٹس اظہار وجود تیسری 6897 فورم 12/20 16 من ساٹھ  
 الزام تھا کیا ہے کہ وہ جواب ایف آئی آر نمبر 1226 نوٹس 11/20 8 جی 302/324  
 ISAA مکان جمادی میں چارج ہوا ہے جو کہ من ساٹھ کی میں نوٹس کے زمرے  
 میں آتا ہے۔

جواب - عالی

مذکورہ بالا الزام کے جواب میں نیا پتہ ہی موجود ہے نہ کہ

نمبر 1: من ساٹھ کے خلاف جی 4 میں دعوی داری سلسلے میں بنا اور برہنہ کے بنا  
 برہنہ ہے۔  
 نمبر 2: یہ کہ من ساٹھ کے خلاف کسی قسم کی راجدائی یا عینی شہادت موجود نہ ہے۔  
 نمبر 3: یہ کہ من ساٹھ کے خلاف سابقہ دشمنی کے بنا پر مقدمہ درج رہسکتا ہے۔  
 نمبر 4: یہ کہ من ساٹھ کی طرح نہ ہو جی 4 ثابت نہ ہے۔  
 نمبر 5: یہ کہ من ساٹھ کے خلاف صرف 9/2 سے دستبرد میں آجائے ہیں یہ ہے۔  
 نمبر 6: یہ کہ من ساٹھ کو ابھی تک نہ تو مدعی کا حکم حاصل ہوا ہے اور نہ ہی  
 نوٹس اظہار وجود، چارج شہادت، statement وصول ہوئے ہیں۔  
 نمبر 7: یہ کہ من ساٹھ کو ابھی تک مکملہ انوائسری لینے طلب نہیں کیا  
 گیا ہے۔

نمبر 8: یہ کہ یہ امر ٹرا عبداللہ کن ہے کہ آخری نوٹس اظہار وجود میں غلطی کیا گیا ہے  
 کہ من ساٹھ کے خلاف انوائسری ملنے ہو چکی ہے اور من ساٹھ کے خلاف  
 انوائسری افسر سزا کی سزا سنائی ہے۔

نمبر 9: یہ کہ من ساٹھ کو انوائسری کا ابھی تک علم نہ ہے اور نہ ہی اسکو انوائسری  
 میں اپنی دماغ لینے طلب کیا گیا ہے۔

نمبر 10: یہ کہ مذکورہ بالا کی دشمنی میں آخری نوٹس اظہار وجود کا کوئی ساٹھ جواز  
 موجود نہ ہے۔ اور یہیں وہ آپ جہاں لینے نظر ثانی کا حکم ہے۔  
 نمبر 11: یہ کہ من ساٹھ میں قید ہے۔ اور مذکورہ کی سزا ابھی تک شہر میں  
 سنی ہے جو کہ آئندہ جی 4 میں شہر میں ہی امید ہے۔

بعض وجوہات کی بنا پر برمن سائل کی حوالہ انٹرنیٹ پر نامعلوم قسم کے ذریعہ ما  
 ملتی رہی جاوے اس بارے میں سائل میں سائل میں یہ فرد نامزد نہیں ہے۔ عزت  
 ماہر سپریم کورٹ کے پاس ہوا اور نامعلوم سال 2019ء اور عزت ماہر سپریم کورٹ  
 کے حوالے سے 2019ء کے سائل کے حوالے سے بھی دیا گیا ہے۔ اور حوالہ سے منسلک  
 کہ صرف ایک درج ہو گیا ہے۔ ان منسلکات میں یہ منسلک حکم جاری کیا ہے  
 ایسا کہ ظرافت باقاعدہ انٹرنیٹ کی جائیگی۔ منسلک ایکٹ کو ذرائع کو موقع دیا  
 جائے گا۔ اور منسلک ایسا کہ ملات ہو جائے گی۔ منسلک ایکٹ کے تحت ملانہ طور پر بھی  
 سزا مستحق ہوگا۔

غیر 13: یہ کہ ابھی تک سائل کو نوٹیفکیشن اظہار وجود اور نہ ہی چارج شیٹ نہ ہی  
 بنیاد برمن کو قانون کے تحت سزا دی جا سکتی ہے۔  
 Statement of allegation نہ ہی انٹرنیٹ میں ملتی یا نوٹیفکیشن وارنٹ ہوا ہے۔

غیر 14: برمن سائل 15-08-09 کا بعض شعبہ ہے اور اپنی تیارہ سالہ ملازمت کے دوران  
 کسی بھی سزا میں ملے۔ برمن سائل میں منسلک مالوں کا تاج دیا ہے اور اس میں مالہ  
 جہاں کے اہتمام کو من و عن تسلیم کیا ہے۔ اور ان پر عمل درآمد کیا ہے۔ جسکی  
 وجہ سے اس میں جہاں بعض من سائل برمن میں ملے اور منسلک مالہ اظہار کرتے  
 رہے ہیں۔ اور من سائل کو نقدانات، تصدیقی اسناد بھی منسلک کئے ہیں۔  
 غیر 15: یہ کہ دوران عمارت میں سائل کو خطہ ڈپٹی انسپکٹر جنرل صاحب کراچ  
 نے مورخہ 20/11/2019ء کو 19822 مبلغ دس ہزار روپیہ۔ 2019ء کے  
 انعام سے نواز ہے جو کہ من سائل کی اچھی اور بہترین کارکردگی کا منہ لولنا  
 ثبوت ہے۔

لہذا نوٹیفکیشن منسلک وجوہات مالہ نامعلوم حوالے سے ملات جائے  
 سپریم کورٹ، خالی کرٹ کی روشنی میں من سائل کے خلاف آخری نوٹیفکیشن  
 اظہار وجوہات ہو جائیں گے تاکہ 44 درجہ کیا جاوے اور من سائل کے  
 حوالہ سے کارروائی کا منسلک منسلک منسلک منسلک منسلک منسلک منسلک منسلک  
 حکم جاری کیا جائے۔  
 مورخہ: 29-12-2020

من سائل کا حوالہ سے ملانہ مسائل کے لئے دعا کرتے ہیں  
 ایسا کہ برمن سائل 1253



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT  
Tel: 0922-9260116 Fax 9260125

F 14

ORDER

This order will dispose of departmental proceedings conducted against constable Asfandiyar No. 1353 (hereinafter called accused official) of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Facts arising of the case are that on 08.11.2020, the accused official has arranged a music program in a marriage ceremony at his village. On the eventful time an incident of killing of five persons and fire arm injuries to 03 other persons took place. One Mirza Ali Khan s/o Hussain Ghulam r/o Kaghazai lodged a report to the incident, wherein the accused official alongwith 03 co-accused is charged by complainant for the aforesaid incident and case FIR No. 1226 dated 08.11.2020 u/s 302, 324, 148, 149 PPC, 15 AA PS Cantt is registered against the accused official and his co-accused.

On the above score of charges, charge sheet alongwith statement of allegations was issued against the accused official and SDPO H/O's Kohat was appointed as enquiry officer in order to scrutinize the conduct of accused official. He filed reply to the charge sheet to the enquiry officer and joined the proceedings. On conclusion the enquiry officer vide his report / finding held him guilty of the charge.

Final Show Cause Notice was issued and served upon the accused official, which was received by the accused official on 18.12.2020, but the accused official deliberately failed to submit reply within stipulated period. The accused official was also called for personal hearing, but failed to appear.

Record gone through, which indicates that the accused official being member of a disciplined department had arranged a dance / music program, wherein an altercation took place and he alongwith 03 other companion started indiscriminate firing, resultantly five persons were killed and 03 others sustained fire arms injuries. The incident created hype in social media, general public as well and earned bad name to the department. Besides, above the accused is involved not only in the murder of five persons and causing fire arms injuries to 03 others, but also committed serious violation of discipline by arranging an illegal gathering in which narcotics, wine used openly & illegal weapons were also on display. From the above, I reached to the conclusion that the accused official has committed a gross professional misconduct in addition to a criminal act. Hence, the charge leveled against the accused official has been established beyond any shadow of doubt.

Therefore, in exercise of powers conferred upon me under the rules ibid I, Javed Iqbal, District Police Officer, Kohat, impose a major punishment of dismissal from service on accused constable Asfandiyar No. 1353 with immediate effect. Kit etc issued be collected.

Announced  
29.12.2020

DISTRICT POLICE OFFICER,  
KOHAT 29/12

OB No. 953  
Dated 29/12/2020  
No. 6598-6601/PA dated Kohat the 30-12-2020.

- Copy of above to the:-
1. Reader/Pay officer/SRC/OHC for necessary action.
  2. L.O for clearance & report

1/21  
21  
حکومت  
کراچی  
مظاہر  
وہاب

BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE,  
KOHAT REGION KOHAT

9 (15)

Subject: APPEAL AGAINST THE ORDER OF DPO KOHAT  
BEARING OB NO. 953 DATED 29-12-2020 WHEREBY THE  
APPELLANT EX-CONSTABLE ASFANDYAR NO. 1353 WAS  
DISMISSED FROM SERVICE WITH IMMEDIATE EFFECT.

Respectfully Sheweth:

With great respect, the appellant prefers the instant appeal against the impugned order of DPO Kohat for consideration based on the following facts and grounds.

FACT:

Allegation against the appellant is that on 08-11-2020, the appellant arranged a music program in a marriage ceremony at his village. During the program, firing took place which resulted in the killing of five persons and injuries to three others. Complainant Mirza Ali lodged the report of the incident charging therein the appellant and his co-accused vide case FIR No. 1226 dated 08-11-2020 U/S 302-324/148-149 PPC / 15AA P.S Cantt Kohat.

SDPO HQ Kohat was reportedly appointed as enquiry officer on completion of inquiry, the enquiry officer held the appellant guilty of the charge. Acting upon the findings of the enquiry officer, the DPO Kohat passed the impugned order. Hence the instant appeal.

Grounds:

- a) That although the impugned order contained that charge sheet and summary of allegation was issued against the appellant, but it did not state that the charge sheet and summary of allegation was duly served upon the appellant. Mere issuance of the same against the appellant was not enough. It required service of the above documents upon the appellant. The appellant was arrested immediately of the occurrence and since 09-11-2020 is confined in District Jail Kohat. No show cause notice / charge sheet and summary of allegation was ever served upon the appellant till today. So the question of submitting reply to the same did not arise.
- b) The enquiry against the appellant was conducted unilaterally and the appellant was not associated with the inquiry proceedings by the enquiry officer. There is nothing on record that either the appellant was brought from Jail before the enquiry officer or the enquiry was conducted inside the District Jail Kohat.

- c) Final show cause notice only was served upon the appellant which was not accompanied with copy of the finding of the enquiry officer. Natural justice demanded copy of inquiry report to be furnished to the accused official to enable him to offer his explanation with regard to adverse finding if any recorded against him. such requirement cannot be brushed aside legally otherwise miscarriage of justice would be caused to the accused official.
- d) The evidence of witnesses if any, was recorded by the enquiry officer in the absence of the appellant as he was confined in the jail and was not brought before the enquiry officer. The appellant was thus deprived of his legal right to cross examine such witnesses.
- e) The impugned order contained that the accused official (the appellant) was called for personal hearing but failed to appear. The question arises that how the appellant could appear before the DPO Kohat when he (the appellant) was and is still confined in the jail.
- f) Cross case was also registered against the complainant party of the above mentioned case and it was yet to be determined as to who was the aggressor and who was aggressed upon.
- g) The use of narcotics and wine in the program as alleged, is devoid of any force as such allegation was not substantiated through any evidence.
- h) The enquiry proceedings were conducted by the enquiry officer against the rules.
- i) The action taken by the DPO against the appellant is un-lawful and not sustainable under the law.

Prayer:

In view of the above submissions, it is prayed that by accepting the instant appeal, the appellant may be re-instated in service w.e.f. the date of his dismissal with all the back benefits please.

Yours Obediently

Ex. Constable Asfandyar No. 1353  
S/o Toor Gul  
R/o Kaghazai P.S. Cantt Kohat.

Dated 28-01-2021

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**BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR.**

Bail Petition No. 370P/2021



1. Asfandyar S/o Toor Gul
2. Mujahid S/o Taj Gul
3. Zahid S/o Shah Nawaz
4. Amshaid S/o Rasool Khan, All R/o Kaghzai, District Kohat.....(Accused/Petitioners)

**VERSUS**

1. The State.
2. Mirzali Khan S/o Hussain Ghulam R/o o Kaghzai, District Kohat.....(Respondents)

**F.I.R NO: 1226, DATED: 08/11/2020,**  
**CHARGE UNDER SECTION 302, 324, 148,**  
**149 PPC, 15-AA, POLICE STATION CANTT**  
**KOHAT.**

**APPLICATION U/S 497 Cr.PC FOR THE**  
**RELEASE OF THE ACCUSED/PETITIONERS**  
**ON BAIL TILL FINAL DECISION OF THE**  
**CASE.**

**Respectfully Sheweth:**

1. That accused/ petitioners have falsely been involved  
.....  
in the above noted FIR and since then behind the

FILED TODAY  
Deputy Registrar

02 FEB 2021

**ATTESTED**  
EXAMINER  
Peshawar High Court

**JUDGMENT SHEET  
PESHAWAR HIGH COURT, PESHAWAR  
JUDICIAL DEPARTMENT**



18

Cr. Misc. (BA) No. 370-P/2021.

Asfandyar & another  
Vs  
The State & another

Date of hearing: 04.06.2021

Petitioner (by): M/s Shan Asghar & Faqirullah Awan, Advocates

State (by): Mr. Muhammad Inam Yousafzai, Addl. AG

Complainant (by): Mr. Ishfaq Ahmad Afridi, Advocate

**JUDGMENT**

MUSARRAT HILALI, I.- Through the instant petition, accused-petitioners, Asfandyar, Mujahid, Zahid and Amshaid, seek their release on bail in case FIR No. 1226 dated 08.11.2020 under Sections 302/324/148/149 PPC / 15-AA, registered at Police Station, Cantt, District Kohat, wherein they are charged for murder of 05 innocent souls and injuring others.

Arguments heard and record perused.

2. The contents of the FIR shows that the complainant was not present on the place of occurrence at the time when the incident took place. He arrived at the place of occurrence upon receiving the information,

*man*

**ATTESTED**

EXAMINER  
Peshawar High Court



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however, there is nothing in the FIR that who informed him about the incident. The incident took place at a wedding party at the accused-petitioners' house where 400/500 persons were present, however, the FIR does not mention any eye witness of the occurrence. The site plan in the instant case has also been prepared on the pointation of complainant, but the record is silent as to who told him that who was standing at which point. There is no specification of the weapon used in the occurrence. As far as the motive put forth by the complainant in the FIR that a month prior to the occurrence, at the wedding party of one Azmat Khan s/o Ajaml, Tehsildar, there was a verbal altercation between the deceased and the accused party, wherein the accused issued life threats to the deceased. The deceased party took the threats so seriously that they even informed the complainant about it but despite threats the deceased went to attend the function of accused party without invitation armed with deadly weapons.

Khan

3. In view of the above details, this Court is of the opinion that involvement of the accused-petitioners

ATTESTED  
EXAMINER  
Peshawar High Court

20

qua their guilt needs further probe in terms of sub-section (2) of Section 497 Cr.P.C. and as such they have succeeded in making out a case for their release on bail.

As far as the cross case FIR No. 1228 dated 09.11.2020 pertaining to the same occurrence lodged by Tor Gul, the uncle of accused Amshaid, wherein he charged the complainant party of the instant case in the same Police Station for firing at him, his son and nephews, who have been allowed bail on merits by the learned Additional Sessions Judge-III, Kohat on 14.01.2021, however, nothing has been brought on record that the accused respondents have misused the ibid bail order by any manner.

4. Above are the reasons for the short order of even date.

Announced  
04.06.2021

*[Signature]*  
JUDGE

No. 10773  
Date of Presentation of Application 20/10/2021  
No of Pages 8  
Copying fee \_\_\_\_\_  
Total 321  
Date of Preparation of Copy 20/10/2021  
Date of Delivery of Copy 20/10/2021  
Received By [Signature]  
(S.B) Hon'ble Justice Musarrat Hilal.  
Noor.Shah

*[Signature]*  
CERTIFIED TO BE TRUE COPY

Examiner  
Government High Court, Peshawar  
Authorized Under Article 87 of  
the Constitution of Pakistan

20 OCT 2021

21

JUDGMENT SHEET  
PESHAWAR HIGH COURT, PESHAWAR  
JUDICIAL DEPARTMENT

Cr. Misc. (BA) No.370-P/2021.

Asfandyar & another Vs The State & another



JUDGMENT

Date of hearing 04.06.2021

Petitioners (by) M/s Shan Asghar & Faqirullah Awan, Advocates

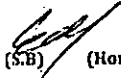
State (by) Mr. Muhammad Inam Yousafzai, Addl. A.G.

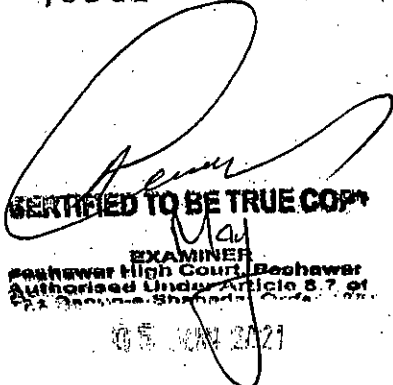
Complainant (by) Mr. Ishfaq Ahmad Afridi, Advocate

MUSARRAT HILALI, J.- For the reasons to be recorded later, this petition is allowed and the petitioners are granted bail in case F.I.R No.1226 dated-08.11.2020 u/ss 302/324/148 /149 PPC/15-AA of Police Station Cantt, District Kohat provided each one of them furnishes bail bonds in the sum of Rs.200,000/- with two sureties each in the like amount to the satisfaction of learned trial Court. The sureties shall be reliable and men of means.

Announced  
04.06.2021

JUDGE

  
(S.B) (Hon'ble Justice Musarrat Hilali)

  
CERTIFIED TO BE TRUE COPY  
EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 87 of  
the Constitution of Pakistan  
05 JUN 2021

No. 37513 \*A.AH\*  
Date of Presentation of Application 05/6/21  
No of Pages 64  
Copying fee 24  
Total 24  
Date of Preparation of Copy 05/6/21  
Date of Delivery of Copy 05/6/21  
Received By [Signature]

POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of an appeal preferred by Ex-Constable Asfandyar No. 1353 (confined in district Jail Kohat) of Operation Staff Kohat through Jail Superintendent, against the punishment order, passed by DPO Kohat vide OB No. 953, dated 29.12.2020 whereby he was awarded major punishment of dismissal from service on the following allegations:-

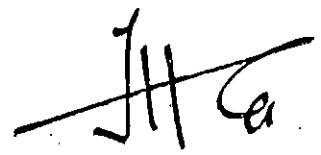
"The appellant arranged a music program in a marriage ceremony at his village Kaghazai, Kohat. On the eventful time an incident of killing of five person and firearm injuries to other 03 person took place. One Mirza Ali Khan s/o Hussain Ghulam r/o Kaghazai lodged a report of the incident wherein the appellant and his co-accused were charged by the complainant for the aforesaid incident and FIR No. 1226, dated 08.11.2020 u/s 302, 148, 149, PPC, 15-AA PS Cantt was registered against the appellant and his co-accused".

Comments as well as relevant record were requisitioned from DPO Kohat. The appellant was called in Orderly Room scheduled on 18.02.2021 but he did not appear as he is behind the bar and his personal hearing was also not advisable.

Record gone through, which indicates that the appellant being member of a disciplined force arranged a musical program which caused killing of 05 persons including 03 injured and earned bad name to Police department.

Above in view, the undersigned reached to the conclusion that the allegations leveled against the appellant are fully proved and the same has also been established by the E.O in his findings. Hence, the impugned order passed by DPO Kohat is justified, upheld and the appeal is hereby rejected.

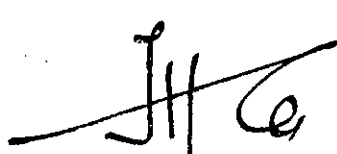
Order Announced  
18.02.2021

  
(TAYYAB HAFEEZ) PSP  
Region Police Officer,  
Kohat Region.

No. 2458 /EC; dated Kohat the 25/2 /2021.

Copy to District Police Officer, Kohat for information and necessary action w/r to his office Memo: No. 2342/LB, dated 15.02.2021. His Service Record and Fauji Missal / Enquiry File is returned herewith.

1. The appellant Ex-Const: Asfandyar No. 1353 of Kohat

  
(TAYYAB HAFEEZ) PSP  
Region Police Officer,  
Kohat Region.

*Objection*

J (23)

BEFORE THE WORTHY PROVINCIAL POLICE OFFICER, KHYBER  
PAKHTUNKHWA, PESHAWAR

SUBJECT: REVIEW PETITION AGAINST THE ORDER DATED 18-2-2021  
PASSED BY WORTHY DIG OF POLICE KOHAT REGION  
KOHAT REJECTING THE APPEAL FILED BY THE  
PETITIONER EX-CONSTABLE ASFAND YAR NO. 1353 OF  
OPERATION STAFF KOHAT AGAINST THE IMPUGNED ORDER  
OF DPO KOHAT BEARING OB NO. 953 DATED 29-12-2020

RESPECTFULLY SHEWETH,

With due respect, the petitioner submit the instant "REVIEW  
PETITION" against the order dated 18-2-2021 passed by DIG of  
Police Kohat Region for your kind consideration on the bases of the  
following facts and grounds.

FACTS:- Briefly stated, allegation against the petitioner was that on 8-11-2020 the  
petitioner had arranged amusical program in the marriage ceremony at his  
village Kaghzai (Kohat). During the program firing took place causing  
death of five persons and injuries to three others complainant Mirza Ali  
lodged the report charging therein the petitioner and co-accused vide case  
FIR No. 1226 dated 8-11-2020 u/s 302/324/148/149 PPC /15AA PS Cantt  
Kohat on completion of departmental proceedings the petitioner was  
dismissed from service by DPO Kohat vide order bearing OB No. 953  
dated 29-2-2020 (copy enclosed) The petitioner filed an appeal before the  
DIG of police Kohat against the impugned order DPO Kohat which was  
rejected vide order dated 18-2-2021. Hence this "REVIEW PETITION" on  
the following grounds. (copy of order enclosed).

GROUND:

- A. That no charge sheet/summary of allegation was served upon the petitioner prior to initiation of departmental enquiry against the petitioner during his confinement in district jail kohat. The order of DPO Kohat did not contain the fact that it had been served upon the petitioner. Hence no reply to the same was submitted by the petitioner.
- B. That neither the petitioner was brought before the enquiry officer from the jail nor the proceedings were held inside the jail by the enquiry officer. The enquiry was conducted unilaterally without associating the petitioner with the enquiry proceedings.

- 24
- C. That copy of the finding report of the enquiry officer was not provided to the petitioner by DPO Kohat along with the final show cause notice prior to imposition of major punishment upon the petitioner in accordance with the rule of "Natural Justice". This had caused great miscarriage of justice to the petitioner in his defence.
  - D. That witnesses if any were examined by the enquiry officer in the absence of the petitioner depriving him of his legal right of cross examination.
  - E. That the impugned order of DPO Kohat contained that the petitioner had failed to appear before him for personal hearing. The question was that how the petitioner could appear before the DPO for personal hearing when he was confined in the jail.
  - F. That the use of wine and narcotics in the program as alleged, was not substantiated through any evidence on record. Such allegation was devoid of any force.
  - G. That cross case was also registered against the complainant party. It was yet to be determined as to who was the aggressor and who was aggressed upon.
  - H. That the enquiry was conducted against the rules. The impugned order of DPO Kohat was based on such legally defective enquiry. Therefore the impugned order of DPO Kohat was not sustainable under the law.
  - I. That the worthy DIG of police Kohat had last right of the above mentioned facts while considering the appeal filed before him by the petitioner. For this reason the order passed by DIG of police Kohat region required "Review" in the instant of justice.

PRAYER:- In view of the above submissions it is prayed that by accepting the instant "REVIEW PETITION" the petitioner may kindly be re-instated Conditionally w.e.f the date of his dismissal from service with all back benefits till the decision of the criminal case pending before the court please.

dated 28/6/2021

Yours Obediently



Ex-Constable Asfand Yar No. 1353  
Of Kohat Distt: Police  
S/O Toor Gul R/O Khaghzai PS Cantt Kohat  
Cell No. 0336-0906710

**VAKALAT NAMA**

NO. \_\_\_\_\_/2021

IN THE COURT OF KP Service Tribunal, Peshawar

Asfandyar (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Deptt: (Respondent)  
(Defendant)

I/We, Asfandyar

Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/2021

Asfandyar  
(CLIENT)

ACCEPTED

Taimur Ali Khan  
**TAIMUR ALI KHAN**  
Advocate High Court  
BC-10-4240  
CNIC: 17101-7395544-5  
Cell No. 0333-9390916

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar