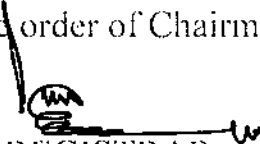


FORM OF ORDER SHEET

Court of _____

Case No. - 326/2023

S.No	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/02/2023	<p>The appeal of Mr. Khurshid Khan received by register post through Sheikh Inamullah Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices be issued to appellant and his counsel for the date fixed and also to provide the Objection slip.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

Respected Sir,

It is submitted that the present appeal was returned to learned counsel for the appellant on 07.10.2022 for removing the deficiencies. On dated 20.10.2022 the appeal was again received to this office by registered post but the objection slip was found missing, in this connection the learned counsel was called telephonically wherein he was asked to send the objection slip. He was also reminded again and again. The learned counsel ensured that he will send the objection slip very soon but in vain. However the appeal is now complete in all respect.

In this connection your honor may apprise that whether the instant appeal be instituted or otherwise. (333)

Submitted for order, please.

REGISTRAR

Worthy Chairman,

Be fixed before the
Court & the counsel be
also asked to submit
objection slip

16/2/23

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service appeal No. 326 of 2022

**Khurshid Khan
VS.
Inspector General Police KPK & Others**


INDEX

S #	Description of Documents	Annexure	Page #
1	Grounds of Service appeal alongwith CM	---	1-9
2	Copy of the service record of appellant	A	10-17
3	Copy of the charge sheet	B	18
4	Copy of the summary of allegations.	C	19
5	Copy of the reply of appellant to the charge sheet.	D	20-21
6	Copy of the Show cause notice	E	22
7	Copy of the defence/ reply to show cause notice.	F	23 - 24
9	Copy of the office order bearing No. 120/EC (OB No. 204) dated: 24-01-2022 of respondent NO. 03.	G	25
10	Copy of the departmental appeal/ representation.	H	26-28
11	Copy of the order bearing No. 5962/ES dated: 08/09/2022 of respondent No. 02	I	29-30
12	Vakalatnama	---	31

Your Humble Appellant


Khurshid Khan
Through Counsel

Dated: 19/10/2022


**Sheikh Inam Ullah
Advocate High Court.**

kinam586@gmail.com
Mobile No.0333-9838007.

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 326 of 2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1516

Dated 05/10/2022

Khurshid Khan, son of Gul Karim Khan, resident of Spin Kamar Lala Khel, Makin, District South Waziristan. Ex. Constable No.162, South Waziristan Police.

APPELLANT

VERSUS

1. **Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.**
2. **Regional Police Officer, D.I.Khan Region, D.I.Khan.**
3. **District Police Officer, South Waziristan.**

RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF THE K.P.
SERVICE TRIBUNALS ACT, 1974, AGAINST THE
ORDER BEARING No. 5962/ES DATED
08.09.2022 OF THE RESPONDENT No.2 AND
ORDER No.120/EC (OB No.204) DATED
24.01.2022 OF THE RESPONDENT No.3.**

PRAYER:

**ON ACCEPTANCE OF PRESENT SERVICE APPEAL AND BY
SETTING ASIDE ORDERS OF RESPONDENTS No.2 & 3
BEARING No. 5962/ES DATED 08.09.2022 AND No.
120/EC (OB No.204) DATED 24.01.2022
RESPECTIVELY, THE APPELLANT MAY PLEASE BE
REINSTATED INTO THE SERVICE OF SOUTH WAZIRISTAN
POLICE WITH ALL BACK BENEFITS.**

Filed to-day

05/10/2022

**SUCH OTHER RELIEF, AS MAY BE DEEMED
PROPER & APPROPRIATE, BY THIS HONOURABLE
TRIBUNAL IN THE ATTENDING CIRCUMSTANCES OF THE
CASE, MAY ALSO BE GRANTED TO APPELLANT IN THE
INTEREST OF JUSTICE.**

Respectfully Sheweth,

1. That the appellant was appointed in the Levy Force in erstwhile South Waziristan Agency on 01.08.2010, and owing to 25th Constitutional Amendment, South Waziristan was merged into province Khyber Pakhtunkhwa. In the year 2020 services of appellant were merged in the K.P. Police as Constable A-1, accordingly constabulary No.162 was allotted to him; and then he started to perform his official duties. Copy of the Service Record of appellant is enclosed as **Annexure A.**
2. That the appellant was performing his official duties and, in the meanwhile, Naib OHC Imran Khan, Police Lines, South Waziristan, by means of a fake transfer order, transferred three constables from Police Station Makeen to Police Line South Waziristan at Tank by receiving amount of Rs.21,000/-. However, the appellant, who was accompanying the said three constables while meeting with Naib OHC Imran Khan, was made a scapegoat as Naib OHC Imran Khan was the close relative of SDPO and he wanted to save Naib OHC Imran Khan. Thus the appellant was charge sheeted on the following allegations:

- i. *The undersigned has come across fake/forged office order bearing fake signature of the undersigned and*

the same fake order was about the transfer of three police constables from police station Makin to police line SWTD at Tanik. You have taken 21000 rupees as a bribe from the said Constable for issuing the same fake/forged order.

ii. Being a part of uniformed force your this act shows gross misconduct on your part.

Copies of the Charge Sheet & summary of allegations are enclosed as **Annexure B & C**.

Copies of the replies of appellant to the Charge Sheet & summary of allegations are enclosed as **Annexure D**.

3. That an inquiry was conducted into the matter wherein appellant was not associated to defend his rights rather the Inquiry Officer, who was already biased, only obtained reply of appellant and then he was not allowed to participate the inquiry proceedings. Upon conclusion of inquiry, the District Police Officer South Waziristan issued a show cause notice to appellant. The appellant submitted defence to the Show Cause Notice.

Copy of the Show cause notice is enclosed as **Annexure E**.

Copy of the defence/reply to show cause notice is enclosed as **Annexure F**.

4. That thereafter respondent No.3/ District Police Officer, South Waziristan, vide Order bearing No.120/EC (OB No.204) dated 24.01.2022 awarded major punishment of 'Dismissal from Service' with immediate effect.

Copy of the office order bearing No.120/EC (OB No.204) dated 24.01.2022 of respondent No.3 is enclosed as **Annexure G**.

5. That the appellant filed Departmental Appeal/Representation to the respondent No.2/Regional Police Officer D.I.Khan, but the same was dismissed vide order bearing No.5962/ES dated 08.09.2022.

Copy of the Departmental Appeal/Representation is enclosed as Annexure I.

Copy of the order bearing No.5962/ES dated 08.09.2022 of respondent No.2 is enclosed as Annexure II.

6. That aggrieved from the orders as to dismissal from service as well as dismissal of his departmental appeal, the appellant has been left with no option but to file present service appeal before this Honourable Tribunal for his reinstatement into service with all back benefits on, inter alia, the following grounds:

GROUND:

- i. That the impugned Orders bearing No. 5962/ES dated 08.09.2022 of respondent No.2 and No. 120/EC (OB No.204) dated 24.01.2022 of respondent No.3 are the biased, without jurisdiction, without lawful authority and having no binding effect upon rights of appellant.
- ii. That after the completion of inquiry, no inquiry report was communicated to appellant with the show cause notice so that he may prefer his defence. Non-delivery of inquiry report vitiates the entire departmental proceedings against appellant.
- iii. That appellant has not been afforded opportunity to cross examine the witnesses or go through the record produced against him, and even, no evidence was recorded in his presence rather entire proceedings in the inquiry were conducted in the absence of appellant. Appellant was entitled to a fair trial within the contemplation of Article 10-A of the Constitution of Pakistan, 1973. On this score alone, the appellant is entitled to be reinstated.

- iv. That a transparent inquiry has not been not conducted into the matter and efforts were made to save the main culprit 'Naib OHC Imran Khan' to whom amount was paid by the transferee constables directly and it was he (Imran Khan) who handed over transfer orders to said constables. Only reason behind this was, the said Imran Khan is closely related to the Inquiry Officer/SDPO, and Inquiry Officer left no stone unturned to save him.
- v. That Impartial Inquiry through an independent officer was a legal and constitutional right of the appellant; and it was also the moral duty of the Inquiry Officer to lay his hand off the inquiry proceedings as one of the delinquent personnel was his relative.
- vi. That due process has not been carried out either by the Inquiry Officer or by the respondent No.3 and the appellant has been dismissed from service in a cursory, hasty and slipshod manner.
- vii. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

It is therefore, humbly prayed that the present service appeal may graciously be allowed as prayed for and thereby the appellant may please reinstated into service with all back benefits.

Yours Humble Appellant


(Khurshid Khan)
Through Counsel



Dt. 03.10.2022

SHEIKH INAMULLAH
Advocate High Court, D.I.Khan.

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. _____ of 2022

Khurshid Khan
Versus.
Inspector General of Police K.P.K. etc
Service Appeal

VERIFICATION:

I, the appellant, on this day of September-2022, herein mentioned above, do hereby verify that all the contents of this appeal are true & correct and also that it is the first appeal on the subject matter and no such appeal has earlier been filed.


Appellant

AFFIDAVIT:

I, the appellant; do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge, belief and information; and that, nothing has been deliberately concealed from this Honourable Tribunal.


Identified by Counsel:
Sheikh Inamullah Advocate


Deponent



8

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**


Civil Misc. Petition No. _____ of 2022

In Service Appeal No. _____ of 2022

**Khurshid Khan Vs. Inspector General of Police K.P.K. etc
Service Appeal**

APPLICATION FOR SUSPENSION OF THE OPERATION OF
IMPUGNED ORDER No.120/EC (OB No.204) DATED
24.01.2022 OF THE RESPONDENT No.3 TO THE EXTENT OF
REGISTRATION OF FIR, TILL FINAL DECISION OF SERVICE
APPEAL.

Respectfully Sheweth,

1. That a Service Appeal is being filed before this august court and the grounds of same may please be considered as an integral part of this Petition.
 2. That the petitioner/appellant has got a good prima case on law as well as on facts and there is every likelihood of the success of Service Appeal; hence, balance of convenience tilts in favour of the appellant.
 3. That the petitioner has challenged the vires of impugned dismissal from service letter which also contains directions for registration of FIR against the appellant and as the authenticity of said office order is subjudice before this Honourable Tribunal, therefore, suspension of the impugned office order to this extent would be in the interest of justice.
- 

It is, therefore, humbly prayed that on acceptance of the present Civil Misc. Petition, the operation of impugned office order, to the extent of registration of FIR against appellant, may please be suspended till decision of Service Appeal, and in the meanwhile, status quo may graciously be ordered to be maintained.

Yours Humble Appellant



(Khurshid Khan)
Through Counsel



Dt. 19 .10.2022

SHEIKH INAMULLAH
Advocate High Court, D.I.Khan.

AFFIDAVIT I, the appellant; do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Misc. Application** are true & correct to the best of my knowledge, belief and information; and that, nothing has been deliberately concealed from this Honourable Tribunal.



Deponent

Annex A = 10

1	2	3	4		5		6	7	8	9	10
Name of Post	Whether Substantive or officiating; and Whether permanent of temporary	If officiating state (I) substantive appointment or (II) whether service counts for pension under rule 3.2(i) of C.S.R.(Pb.) Volume II	Pay in substantive Post		Additional Pay for officiating		Other Emoluments Falling Under the Term "pay"	Date of appointment	Signature and designation of the Head of the office or other Attesting Officer in Testation of columns 1 to 8	Date of termination or appointment	
درجہ ملازمت	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پیشکش کا مستحق ہے	تختواہ بطور عارضی ملازمت	تختواہ بطور قائم مقام	مانوائے تختواہ دیگر الاؤنس	تاریخ تقرری	خط دفتر افسر مجاز	تاریخ انتظام ملازمت			
			Rs.	Ps.	Rs.	Ps.					
Senior S.P.O. in B.P.S - 5 No. 33404-16A-311		Pay Rs.	33404					01/07/2010			
do -		Pay Rs.	33404					01/12/2010			
R.B.S - 5 No. 5402-210-132-02		Pay Rs.	5402					01/07/2011			
do -		Pay Rs.	5402					01/12/2011			
do -		Pay Rs.	5404					01/12/2012			
do -		Pay Rs.	6104					01/12/2013			

Attested

(Signature)

Political Agent,
South Waziristan Agency

P.A. S.W.A.

Pay Rs.
81-00

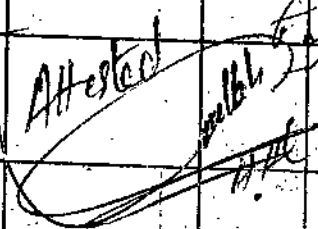
Incl...

P.A. S.W.A.

6	7	8	9	10	11	12	13		14	15
Other documents falling under the term "pay"	Date of appointment	Signature of Government Servant	Signature and designation of the Head of the office or other Attesting Officer in (estation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion transfer dismissal etc)	Signature of the Head of the office of other attesting Officer	Name and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitab to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین Period Govt: to which debitab عرصہ حکومت کے نام قابل	Signature of the head of the office or other attesting office	Reference to any recorded punishment or censure, or reward or praised of the Government servant سزا یا یا غیر مناسب کارکردگی کارکردگی
ماسوائے تنخواہ دیگر ادا ہونے والے	تاریخ تقرری	دستخط افسر مجاز	دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی یا تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار		دستخط افسر مجاز	
	01/08/2010		Political Agent, South Waziristan Agency					Newly appointed. vide PA's Order No. 2200/2010-PA, District. AI-02-2010		
	01/12/2010		P.A. S.W.A					Services transferred from To 22/12/2010 Office. Copy of pay band.		1-8-2010 Office.
	01/07/2011		Political Agent, South Waziristan Agency							
	01/12/2011		Political Agent, South Waziristan Agency		Pay revision 01-07-2011					
	01/12/2011		Political Agent, South Waziristan Agency		Increment					
	01/12/2012		P.A. S.W.A		Increment					
	01/12/2013		P.A. S.W.A		Increment			Attested 2011-2013		

12

1	2	3	4	5	6	7	8	9	10
Name of Post	Whether Substantive or not	State or service	Pay in substantive Post	Additional Pay for officiating	Other Emoluments falling Under the Term "pay"	Date of appointment	Signature of Government Servant	Signature and designation of the head of the office or other Officer In Attestation of columns 1 to 8	Date of termination or appointment
درجہ ملازمت	نام مقام	مقامی یا ریٹائرمنٹ کے تحت	تختخواہ بطور عارضی ملازمت	زائد تختخواہ بطور قائم مقام	ماسوائے تختخواہ دیگر الاؤنس	تاریخ تقرری	دستخط بری ملازم	دستخط افسر مجاز	تاریخ قطع زمت
			Rs. Ps.	Rs. Ps.					
				Rs. 6440/-		11/12/2014		P.A. S.W.A.	
				Rs. 8392/-		11/7/2015			
				Rs. 8685/-		01/12/2015		A.S.W.A.	30/11/2016
				Rs. 10690/-		7/1/2016		S.W.A.	30/6/2016
				Rs. 11106/-		12/1/2016		S.W.A.	20/1/2016
				Rs. 11324/-		7/2/2017		D.S.W.A.	11/6/2017
				Rs. 13760/-		12/1/2017			

Attested


6	7	8	9	10	11	12	13		14	15	
Other Emoluments Falling Under the Term "pay"	Date of appointment	Signature and designation of Government Servant	Signature and designation of the Head of the office or other attesting officer in station of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion transfer dismissal etc)	Signature of the Head of the office of other attesting Officer	Name and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other attesting office	Reference to any recorded punishment or reward or praised of the Government servant
								Period	Govt: to which debitable		
ماسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط افسر مجاز ری ملازم	دستخط افسر مجاز ری ملازم	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی۔ تبادلہ یا رطرنی	دستخط افسر مجاز	رضعت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے	درمیان تنخواہ کا تقصین	دستخط افسر مجاز	سزایا جزی یا غیر مناسب کارکردگی کا ریکارڈ
				P.A. 323 dt 21/2/19							
				Draw Rs. 1200/- on 1/12/18							
				of promotion							
				30/11/2018	Increment						
	24/12/2018										

PROMOTED AS LANCE NAIK IN BPS-06
 Viz: 10620-560-27420 W.E.F. 20.12.2018
 Vide Deputy Commissioner/Commandant, South Waziristan Levies Order No.587-93/Levies (19) dated 07-02-2019

PROMOTED AS LANCE NAIK IN BPS-06
 Viz: 10620-560-27420
 Pay on 19.12.2018 Rs.14260/- (B-5)
 Pay fixed on 24.12.2018 Rs.14540/- (B-6)
 Pay with premature increment Rs.15100/- (B-6)
 Pay on 24.12.2018 Rs.15100/- (B-6)

Attested

01	09	سید کسبیل	21707-77489-7	مدرسہ اسلامیہ	1
02	09	سید کسبیل	21707-2773210	مدرسہ اسلامیہ	2
03	09	سید کسبیل	21707-293506	مدرسہ اسلامیہ	3
04	09	سید کسبیل	21707-7943886	مدرسہ اسلامیہ	4
05	09	سید کسبیل	21707-6334859	مدرسہ اسلامیہ	5
06	09	سید کسبیل	21708-1384092	مدرسہ اسلامیہ	6
07	09	سید کسبیل	21707-2807299-7	مدرسہ اسلامیہ	7
08	09	سید کسبیل	21707-8895781	مدرسہ اسلامیہ	8
09	09	سید کسبیل	21707-9848394-9	مدرسہ اسلامیہ	9
10	09	سید کسبیل	21707-1473081-3	مدرسہ اسلامیہ	10
11	09	سید کسبیل	21707-0482166-7	مدرسہ اسلامیہ	11
13	09	سید کسبیل	21707-9381902-1	مدرسہ اسلامیہ	13
13	09	سید کسبیل	21707-2441251-1	مدرسہ اسلامیہ	13
14	09	سید کسبیل	21707-7887445-0	مدرسہ اسلامیہ	14
15	09	سید کسبیل	21707-5807794-9	مدرسہ اسلامیہ	15
16	09	سید کسبیل	21707-5386092-0	مدرسہ اسلامیہ	16
17	09	سید کسبیل	21707-6755427-0	مدرسہ اسلامیہ	17
18	09	سید کسبیل	21707-3804750-7	مدرسہ اسلامیہ	18
19	09	سید کسبیل	21707-7573723-3	مدرسہ اسلامیہ	19
20	09	سید کسبیل	21707-2552187-7	مدرسہ اسلامیہ	20
21	09	سید کسبیل	21707-2842247-7	مدرسہ اسلامیہ	21
22	09	سید کسبیل	21707-6503681-7	مدرسہ اسلامیہ	22
23	09	سید کسبیل	21707-2330453-7	مدرسہ اسلامیہ	23
24	09	سید کسبیل	21707-1114528-3	مدرسہ اسلامیہ	24
25	09	سید کسبیل	21707-0485948-1	مدرسہ اسلامیہ	25
26	07	سید کسبیل	21707-3139374-3	مدرسہ اسلامیہ	26

Handwritten signature and initials in the bottom left corner.

141	07	A-1	21705-52143-9	
142	07	A-1	21702-81987-4	
143	07	A-1	21705-9398066-7	
144	07	A-1	21705-7096358-3	
145	07	A-1	21705-3986373-7	
146	07	A-1	21702-2547205-1	
147	07	A-1	21705-9402426-1	
148	07	A-1	21702-7314426-7	
149	07	A-1	21705-1538139-9	
150	07	A-1	21702-3387785-5	
151	07	A-1	21704-6138931-7	
152	07	A-1	21704-8702625-9	
153	07	A-1	21704-5361309-5	
154	07	A-1	21704-4664842-3	
155	07	A-1	21705-6742123-7	
156	07	A-1	21707-5110006-1	
157	07	A-1	21707-3698513-9	
158	07	A-1	21704-1974299-9	
159	07	A-1	21704-2743609-3	
160	07	A-1	21705-1472392-1	
161	07	A-1	21706-5703975-6	
162	07	A-1	21703-5110572-7	
163	07	A-1	21702-8840512-7	
164	07	A-1	21705-4709533-1	
165	07	A-1	22201-6073883-9	
166	07	A-1	21705-7260838-9	

Handwritten signature and scribbles

17

LA 7772X B = (8)

CHARGE SHEET

1) I Mr. Khan Zeb (PSP) District Police Officer, South Waziristan as Competent Authority, hereby charge you Constable Khuraid No.162 follows:-

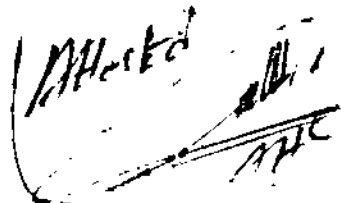
- i) The undersigned has come across fake/forged office order bearing fake signature of the undersigned and the same fake order was about the transfer of three police Constables from police station Maidin to police line SWTD at Tank. You have taken 21000 rupees as a bribe from the said Constable for issuing the same fake/forged order.
- ii) Being a part of uniformed force your this act shows gross misconduct on your part.

By reason of the above, you appear to be guilty of misconduct under Police Disciplinary Rules, 1975 with amendments to 2014 and have rendered yourself liable to all or any of the penalties specified in the Rules:-

- 2) You are, therefore required to submit your written defence within 7 days of the receipt of this Charge Sheet to the Enquiry Officer as the case may be.
- 3) Your written defence, if any, should reach to the Enquiry Officer within the specified period failing which it shall be presumed that you have no defence to put in and in that case, exparte action will be taken against you.
- 4) You are also at liberty if you wish to be heard in person.
- 5) Statement of allegations is enclosed.



(Khan Zeb) PSP
District Police Officer,
South Waziristan Tribal District



Amrce (7)

SUMMARY OF ALLEGATIONS

1. L. Mr. Khan Zeb, PSP District Police Officer, South Waziristan Tribal District, on of the opinion that Constable Khurshid No. 162 of this district has rendered himself liable to be proceeded against as he committed the following non-compliance within the meaning of Police Disciplinary Rules, 1975 read with Amendments 2014


STATEMENT OF ALLEGATIONS.

- ii) The undersigned has come across fake/forged office order bearing fake signature of the undersigned and the same fake order was about the transfer of three police Constables from police station Makin to police line SWTD at Tank. You have taken 21000 rupees as a bribe from the said Constable for issuing the same fake/forged order.

Being a part of uniformed force your this act shows gross misconduct on your part.

For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, Mr. Sharif Ullah Khan, SPPD, Sarankel SWTD, is appointed as Enquiry Officer to conduct enquiry under the Rules.


3) The Enquiry Officer shall, in accordance with the provision of the Police Disciplinary Rules, 1975 read with Amendments 2014 provide reasonable opportunity of hearing to the accused, record its findings and make within 15 days of the receipt of this order, its recommendation as to punishment or other appropriate action against the accused.



 (Khan Zeb) PSP
 District Police Officer,
 South Waziristan Tribal District

No. 28 SWTD Dated the 07.01.2022

Copy of above is forwarded to the:-

- 25 Enquiry Officer of this district is directed to initiate departmental proceedings against the above official under the Police Disciplinary Rules, 1975 read with Amendments 2014.
- 26 Constable Khurshid N.162 to appear before the Enquiry Officer on the date time and place fixed by the Enquiry Officer for the purpose of enquiry proceedings.


 (Khan Zeb) PSP


 03489817919
 7-01-2022

Annex D = 20

To: The Inquiry Officer SDPO Barwahi
South Waziristan Tribal District.

Subject: REPLY TO CHARGE SHEET NOTICE.

Respected Sir,

With reference to your good-self Charge sheet Notice, I may refer the following humble submissions in my defence:

1. I have been issued the above charge sheet notice on the ground that I issued a fake transfer order bearing fake signature of your kind honour, whereas, in-fact I have no concern whatsoever with the said transfer order. Actually, I having good relations with Naib OHC Imran Khan, made a request on behalf of the said three constables to transfer them if possible. Thereafter I along with all the three constables visited the office of said Imran Khan who demanded Ra.21,000/- (i.e. Ra.7000/- from each constable) in lieu of the transfer and in response all the three constables handed over a total sum of Ra.21,000/- to said Imran in hand, and in response, he handed over them the transfer order in question. Neither I demanded Ra.21,000/- from three constables nor they paid the said amount to me or through me rather the amount was paid by them directly to Naib OHC Imran. My roll was only that I accompanied them to the office of OHC to make a request for transfer, and nothing more.

نہی
E.O

صاف سے جواب

درج ذیل
مشورہ

312
10/02

Sir, so far as the bogus transfer order with fake signature is concerned, the same was handed over by the Imran Naib OHC, and diary/despatch register is also in his custody, therefore, nothing can be attributed to me. I have been made a scapegoat in this case, and there is not a single evidence against me to support the charge levelled against me. I again reiterate that I have no concern with the fake transfer order rather it was the matter between transferred constables and the Naib OHC Imran.

Handwritten signature

Sir, I have not been afforded proper opportunity of defence nor I have been given a chance to defend my rights during the inquiry.



Respectfully, I have been provided with the opportunity to state my case and the above notice has been received by me to enable me to prepare my defence in the light of said documents. I should be very grateful if you could kindly please provide me with the evidence, if available, in the support of charges against me so as I may explain my position on better footing.

6. I am a student and I have been the victim of the actions of some police officers who so ever and wherever they may be employed in an official position, looks forward to seeing the result of his past actions and redress of his grievances and would like the last chance to look up the names and names of the officers concerned, names of the case of charge and I am not in any way to state my own views, opinions, and feelings.

7. As far as the suspension of the present case is concerned, I would like to state that the charges levelled against me are not the result of a police officer but the result of the actions of my superior officers.

8. I am a student and I have been the victim of the actions of some police officers who so ever and wherever they may be employed in an official position, looks forward to seeing the result of his past actions and redress of his grievances and would like the last chance to look up the names and names of the officers concerned, names of the case of charge and I am not in any way to state my own views, opinions, and feelings.

9. In the last request for affording me opportunity of personal statement, I have stated that I am not a cooperative defence.

Attested

Your most obedient servant

MCIC/01/2222

(Khurshid Khan)
Constable Bell No. 162
South Westiston Police.

SHOW CAUSE NOTICE.

1. KHAN ZEB (PSP), District Police Officer, South Waziristan Tribal District as Competent Authority Under Khyber Pakhtunkhwa Police Rules 1975 with Amendments-2014, has found that you, Constable Khurshid No.162 rendered yourself liable to be proceeded against under Khyber Pakhtunkhwa, Police Rules 1975 for the following misconduct:-

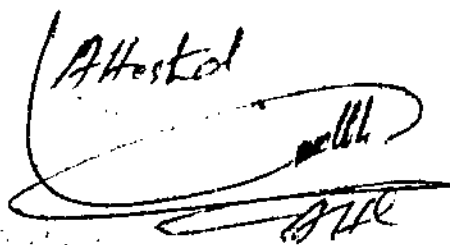
The undersigned has come across fake/forged office order bearing fake signature of the undersigned and the same fake order was about the transfer of three police Constables from police station Makin to police line SWTD at Tank. You have taken 21000 rupees as a bribe from the said Constables for issuing the same fake/forged order


3. Your this act is prejudicial to the efficient discharge of official duty and badly effect the performance of police as a force.

4. You are therefore, called upon to show cause as to why you should not be dealt with strictly in accordance with the Khyber Pakhtunkhwa Police Rules 1975 for the misconduct referred to above

5. You should submit your reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.

6. You may inform the undersigned that whether you want to avail of the chance of personal hearing or not.

Attested



(Khan Zeb)PSP
District Police Officer,
South Waziristan Tribal District

AMMEX = F



To: The Worthy District Police Officer,
South Waziristan Tribal District.

Subject: REPLY TO SHOW CAUSE NOTICE.

Respected Sir,

With reference to your good-self Show Cause Notice, I may refer the following humble submissions in my defence:

1. I have been issued the above show cause notice on the ground that I issued a fake transfer order bearing fake signature of your kind honour, whereas, in-fact I have no concern whatsoever with the said transfer order. Actually, I having good relations with Naib OHC Imran Khan, made a request on behalf of the said three constables to transfer them if possible. Thereafter I along with all the three constables visited the office of said Imran Khan who demanded Rs.21,000/- (i.e. Rs.7000/- from each constable) in lieu of the transfer and in response all the three constables handed over a total sum of Rs.21,000/- to said Imran in hand, and in response, he handed over them the transfer order in question. Neither I demanded Rs.21,000/- from three constables nor they paid the said amount to me or through me rather the amount was paid by them directly to Naib OHC Imran. My roll was only that I accompanied them to the office of OHC to made a request for transfer, and nothing more.
2. Sir, so far as the bogus transfer order with fake signature is concerned, the same was handed over by the Imran Naib OHC, and diary/despach register is also in his custody, therefore, nothing can be attributed to me. I have been made a scapegoat in this case, and there is not a single evidence against me to support the charge levelled against me. I again reiterate that I have no concern with the fake transfer order rather it was the matter between transferred constables and the Naib OHC Imran.

3. Sir I have not been afforded proper opportunity of defence nor I have been given a chance to defend my rights during the inquiry.

Attested

Besides, I have not been provided any document on the basis whereof the show cause notice has been issued so as to enable me to prepare my defence in the light of said documents. I therefore, request your kind honour to please, please apprise me about any evidence, if available in the support of charge against me, so as I may explain my position on better footings.

4. Sir, your good self is the last hope for all and saviour of the rights. Any police official who so ever and wherever he may be is placed to an unjust position, looks forward to your honour for the relief of his pain he feels and redress of his grievance, and you are the last resort to heal-up the wounds and bruises of the aggrieved personnel, same is the case of mine and I am not an exception to them and an eagerly optimistic of your benign look.
5. Sir as far the legal position of the present case is concerned, your good-self better know that the charges levelled against cannot meet the standards of proof as per the Khyber Pakhtunkhwa Police Rules, 1975.
6. Sir, I committed no fault, misconduct, or any other act which may constitute inefficiency on my part, I obeyed the instructions of my superior and used to comply all the SOPs during the performance of my official duties; and assure you Sir, in future too I shall be loyal to my official duties and remain obedient of my superiors.
7. In the last I request for affording me opportunity of personal audience and also request for provision of the record, so considered against me, to submit a comprehensive defence.

Yours most obedient servant.


Dt. 28.12.2021

(Khurshid Khan)
Constable Belt No.162
South Waziristan Police.

Annex C. 3

OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.


ORDER

My this order will dispose of departmental proceedings in violation of a Khurshid No. 162 of this District Police in the sense of allegations that he is found guilty of forgery by making fake transfer order of Constable of this Police Station. ~~Make to Police~~

The said Charge Sheet No. 3258-59/SWTD, dated 06.12.2021. Mr. ~~Subir Gulab Khan~~ Subir Gulab Khan SWTD has been nominated as enquiry officer to conduct proper departmental enquiry into the matter. The enquiry officer conducted proper departmental enquiry into the matter. The enquiry officer conducted proper departmental enquiry and submitted his report wherein the above mentioned Constable has been found guilty of Major Punishment.

In light of findings/recommendations of the Enquiry Officer and available record on file against the above mentioned official, I Khan Zeb, (PSP) District Police Officer, South Waziristan Tribal District being a Competent Authority, hereby award MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE with immediate effect.

OB No. 204
Dated: 24-01-2022

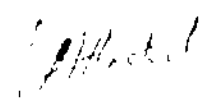

District Police Officer
South Waziristan Tribal District.

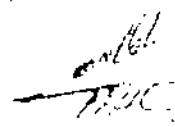
No. 120 /EC.


Dated 24-01-2022

Copy of above is submitted to -

- 1. The Regional Police Officer, DI Khan Region for favour of information.
- 2. Acct. PA, Reader, SEC and OHC for information and further necessary action.






District Police Officer
South Waziristan Tribal District.

Annex 17 (15)

To: **The Worthy Regional Police Officer,
D.I.Khan Region,
D.I.Khan.**

Subject: APPEAL AGAINST THE DISMISSAL FROM SERVICE ORDER NO.204 DATED 24.01.2022 ISSUED BY THE DISTRICT POLICE OFFICER SOUTH WAZIRISTAN.

Yours Excellency,

The appellant have the honour to submit the following few submissions for your good-self kind consideration:

1. That the appellant had been serving as Constable No 162 in the District Police of South Waziristan Tribal District and was charge sheeted on the following allegations:

- i. *The undersigned has come across fake/forged office order bearing fake signature of the undersigned and the same fake order was about the transfer of three police constables from police station Maku to police line SWTD at Tank. You have taken 21000 rupees as a bribe from the said Constable for issuing the same fake/forged order*
- ii. *Being a part of uniformed force your this act shows gross misconduct on your part.*

2. That an inquiry was conducted in to the matter wherein appellant was not associated to defend his rights rather the Inquiry Officer only obtained his reply and then appellant was not allowed to participate the inquiry proceedings. Upon conclusion of inquiry, the District Police Officer South Waziristan issued a show cause notice to appellant. The appellant submitted defence to the Show Cause Notice. *Copies of the Show Cause Notice and defence are enclosed herewith.*

*Produced
1/1/22*

3. That there is no order of the District Police Officer, South Waziristan, with order of...

of Dismissal from Service with immediate effect, which is liable to be cancelled and I am entitled to be reinstated on the following reasons amongst others:

- i. Because, a transparent inquiry was not conducted into the matter and efforts were made to make the appellant (Nab OHC Imran Khan) to whom amount was paid by the transferees constables directly and it was he (Imran Khan) who handed over transfer orders to said constables. The only reason behind this was, the said Imran Khan is closely related to the Inquiry Officer, and Inquiry Officer left no stone unturned to save him.
- ii. Because, impartial inquiry through an independent officer was a legal and constitutional right of the appellant; and it was also the moral duty of the Inquiry Officer to lay his hand off the inquiry proceedings as one of the delinquent personnel was his relative.
- iii. Because, no fair chance of defense was afforded to the appellant.
- iv. Because, during inquiry all the evidence was collected by the Inquiry Officer secretly and without the knowledge of appellant. Similarly, appellant was not afforded with opportunity to be acquainted with the evidence so produced & examined against him and to cross examine such evidence/witnesses in to surface out the actual reality.
- v. Because, it was the legal requirement to provide appellant the copy of inquiry report with show cause notice or any other record, making basis of the Show cause notice, enabling the appellant to submit a proper and comprehensive defense to the show cause notice. Moreover, in the reply to show cause notice appellant specifically mentioned in para No.3 that:

"Besides, I have not been provided any document on the basis whereof the show cause notice has been issued so as to enable me to prepare my defence in the light of said documents. I therefore, request your kind honour to please, please apprise me about any evidence, if available in the support of charge against me, so as I may explain my position on better footings."

The "Fair Trial" is the constitutional right of every person held accused of certain charges; but in this case a fair trial has not been conducted, nor appellant was provided with necessary documents/inquiry report to defend the same. Thus, legal sanctity cannot be attached to the order in question.

- 4. It is further requested that the reply to show cause notice may also be considered as an integral part & parcel of this appeal/representation, and I may also be afforded with opportunity of personal audience.

In view of the above humble submissions, the appellant beseeches your kind honour to please cancel/set aside the dismissal from service order and appellant may please be reinstated with all back benefits.

Yours most obedient Servant,

Attested
[Signature]
[Signature]

DL 27.01.2022

KHURSHID KHAN
ex-Constable Bait No.162
South Waziristan Police.

AFFIDAVIT:

It solemnly affirmed & declared on oath that all the particulars contents of this appeal/representation are true and correct to the best of my knowledge and belief, and nothing has been deliberately concealed.



Deponent

Annex I = (27)



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION
☎ 0956-9280291 Fax # 9280290
✉ esd.ico.djk@gmail.com

No. /ES

dated 01.12.2022

9. 092922

ORDER

This order disposes of departmental appeal filed by Ex-Constable Khurshid Khan No.162 of District Police South Waziristan against the order of Major Punishment-(Dismissal from Service)-by the DPO South Waziristan passed vide his office OB No.204 dated 24.01.2022, on the following allegations:
"He is found involved in forgery by making fake transfer order of three constables from Police Station Makin to Police Lines South Waziristan at Tank"

2. DPO South Waziristan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Sharif Ullah Khan SDPO Sarwaki, who concluded that allegation stand proved against the appellant and that found guilty of the charges leveled against him. The Enquiry Officer further recommended for Major Punishment against the appellant. The appellant was also served with Final Show Cause Notice issued by DPO SWTD. He was also called in orderly room but neither defends him nor satisfied the DPO SWTD. Hence, the appellant was awarded major punishment of Dismissal from Service vide the impugned order OB No.204 dated 24.01.2022.

3. The appellant preferred an appeal against the impugned order on 27.01.2022. His appeal was sent to DPO South Waziristan for comments and provision of his service record vide this office Letter No.641/ES dated 02.02.2022. DPO South Waziristan, vide his office memo: No. 197 dated 15.02.2022, furnished comments on the subject appeal wherein he stated that the appellant enlisted as Constable in Levy Force South Waziristan on 01.08.2010 & absorbed from Levy Force to Police on 14.02.2020. He further stated in his comments that the appellant had taken 21000/- rupees as a bribe from 03 constables for issuing the same fake/forged order.

4. The appellant appeared before the undersigned, in orderly room held on 09.03.2022 and prayed to set aside the impugned order of the DPO South Waziristan. The record was perused. He pleaded that he was innocent in making fake transfer order of three constables of SWTD. He further held that the fake & forged order was prepared by appellant Ex-Constable Muhammad Imran No.602. However, the other appellants (named Mr. Qazi Rehman No.217, Mr. Zahoor Rehman No.449, Mr. Muhammad Imran No.602 & Mr. Shahid Ullah No.461), on the other hand, hold him as motivator & executor of the said forged orders.

5. In this regard, SP FRP DI Khan was directed to conduct a de novo enquiry on the following terms of reference (TOR): and submit his findings within 30-days, vide this office letter No.2026/ES dated 31.03.2022.

- i. Fix responsibility on the one who initiated & forged the said transfer order.
- ii. As to whether the appellant involved in making the said forged order or not.

6. SP FRP DI Khan, vide his office letter No.1223/FRP, dated 30.06.2022, has intimated that, the delinquent Ex Constable has been found guilty of the charges leveled against him. He has been found guilty of initiating, making & abetting the preparation of the said fake transfer order under question pertaining to the transfer/posting orders of Ex-Constable Qazi Rehman No.217, Ex-Constable Zahoor Rehman No.449 & Ex-Constable Shahid Ullah No.461 for posting at the places of their choices and also scanned bogus signatures of DPO concerned, which is a criminal act. Such allegations have been proved during the enquiry so far conducted on the issue. He has also been found in another case of forgery & making fake documents vide FIR No.02/2021 u/s 419/420/468/471 PPC PS FIA DI Khan.

7. Keeping in view the above, I, SHAUKAT ABBAS, PSP, Regional Police Officer, Dera Ismail Khan, in the exercise of powers conferred on me under Rule-11, clause-4 (a), of the Police Rules 1975, do not intend take a lenient view owing to allegations stand proved beyond any shadow of doubt. I, therefore, **REJECT** his appeal and uphold the impugned order of major punishment of Dismissal from Service passed by the DPO South Waziristan OB No. 204 dated 24.01.2022.

8. DPO South Waziristan is also directed to lodge an FIR against him for committing offence as stated in the statement of allegations.

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

No. 5962/ES
Copy to the DPO South Waziristan. (Encl: Fauji Missal). The Official concerned may be informed accordingly.

A Hestad
for m/achai, please
12/09/22

[Signature]
(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

BETTER COPY

**OFFICE OF THE REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION
0966-9280291 Fax # 9280290**

Estt.rpo.dik@gmail.com

No. _____ /ES Dated D.I.Khan. 08-09-2022

ORDER

This order disposes of departmental appeal filed by Ex-Constable Khurshid Khan No. 162 of District Police South Waziristan against the order of Major Punishment (Dismissal from Service) by the DPO Police South Waziristan passed vide his office OB No. 204 dated: 24-01-2022, on the following allegations:

"He is found involved in forgery by making fake transfer order of three constables from Police station Makin to Police line South Waziristan at Tank."

2. DPO South Waziristan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Sharif Ullah Khan SDPO Sarwakai, who concluded that allegation stand proved against the appellant and that found guilty of the charges level against him. The Enquiry Officer further recommended for Major Punishment against the appellant. The appellant was also served with Final Show Cause Notice issued by DPO SWTD. He was also called in orderly room but neither defends him nor satisfied the DPO SWTD. Hence, the appellant was awarded major punishment of Dismissal from Service vide the impugned order OB No. 204 dated: 24-01-2022.

3. The appellant preferred an appeal against the impugned order on 27-01-2022. His appeal was sent to DPO South Waziristan for comments and provision of his service record vide this office Letter No. 641/PS dated: 02-02-2022. DPO South Waziristan, vide his office memo No. 197 dated: 15-02-2022, furnished comments on the subject appeal wherein he stated that the appellant enlisted as Constable in Levy Force South Waziristan on 01-08-2010 & absorbed from Levy Force to Police on 14-02-2022. He further stated in his comments that the appellant had taken 21000/- rupees as a bribe from 03 constables for issuing the same fake/ forged order.

4. The appellant appeared before the undersigned in orderly room held on 09-03-2022 and prayed to set aside the impugned order of the DPO South Waziristan. The record was perused. He pleaded that he was innocent in making fake transfer order of three constables of SWTD. He further held that the fake & forged order was prepared by appellant Ex-Constable Mohammad Imran No. 602. However, the order appellants (named Mr. Qazi Rehman No. 217, Mr. Zahoor Rehman No. 449, Mr. Muhammad Imran No. 602 & Mr. Shahid Ullah No. 461), on the other hand, hold him as motivator & executant of the said forged orders.

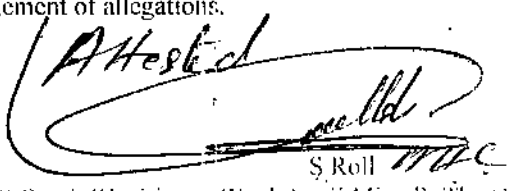
5. In this regard SP FRP DI Khan was directed to conduct a de novo enquiry on the following transfer (TOR) and submit his findings within 30 days, vide his office letter No. 20264/S dated: 31-03-2022.

- i. Fix responsibility on the one who initiated & forged the said transfer orders.
- ii. As to whether the appellant involved in making the said forged order or not.

6. SP FRP DI Khan, vide his office letter No. 1223/FRP, dated: 30-06-2022, has intimated that, the delinquent Ex-Constable has been found guilty of the charged leveled against him. He has been found guilty on initiating, making & abetting the preparation of the said fake transfer order under question pertaining to the transfer/ posting orders of Ex-Constable Qazi Rehman No. 217, Ex-Constable Zahoor Rehman No. 449 & Ex-Constable Shahid Ullah No. 461 for posting at the place of their choices and also scanned bogus signature of DPO concerned, which is a criminal act, such allegation have been proved during the enquiry so far conducted on the issue. He has also been found in another case of forgery & making fake documents vide FIR No. 02/2021 u/s 419/420/468/471 PPC PS FIA D.I.Khan.

7. Keeping in view the above, I **SHAUKAT ABBAS, PSP**, Regional Police Officer, Dera Ismail Khan, in the exercise of powers conferred on me under Rule-11, clause-4 (a), of the Police Rules 1975, do not intend take a lenient view owing to allegations stated proved beyond any shadow of doubt. I, therefore, **REJECT** his appeal and uphold the impugned order of major punishment of **Dismissal** from Service passed by the DPO South Waziristan OB No. 204 dated: 24-01-2022.

8. DPO South Waziristan is also directed to lodge and FIR against him for committing offence as stated in the statement of allegations.



S. Roll *MAC*

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

No. 5962 ES,
Copy to the DPO South Waziristan, (Encl: Fauji Missal). The Official concerned may be informed

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan.

وکالت نامہ

Name: M. Usman Roll No: 0333-9838007 Date: 2022-02-10	KYBER PAKHTUNKHWA BAR COUNCIL INAM ULLAHS Date of Issue: February 2022 Valid Until: February 2022
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ایک روپیہ

کوٹہ

ایڈوکیٹ جناب سروس ٹریبونل گلبرہ مختونخواہ لہیا اور

جناب ایڈووکیٹ خورشید خان

پیغام (ٹیکسٹ) جنرل حرف پوسٹ 009 جھاوڑ

دعویٰ باجزم

تصیل دعویٰ باجزم

پا عتف تحریر آنگہ

مقدمہ معہ بالا امان میں اپنی طرف سے واسطہ دے کر، جناب دہلی رائے لائی باقی مقدمہ معہ مقام ڈیرہ ایسٹ

شیخ انعام اللہ ایڈووکیٹ ہائی کورٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ جس وقت بھی خواہ بہذا بذریعہ غلطی یا غلطی سے روہدہ حالت حاضر ہوتا ہوں گا اور ہر وقت نکالے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر ہوا کرتے ہیں اور اگر کوئی چیز پیش ہوگی اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ پکھری کے اوقات سے پہلے یا پچھے یا بعد از اختتام عدویٰ کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر مقام پکھری کے علاوہ اور جگہ سمیت ہونے یا بعد از اختتام یا پکھری کے اوقات کے آگے یا پچھے پیش ہونے پر مقدمہ کو کوئی امان پچھے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا اجرت واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے بلکہ اگلے سال میں یا بعد از اختتام عدویٰ کے اوقات خود منظور قبول ہوگا اور صاحب موصوف کو مرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذریعہ نظر ثانی، اپیل، گمانی و ہر قسم درخواست، ہر قسم کے بیان دینے اور برائگی یا راضی نامہ یا صلح کرانے یا اقبال دعویٰ یا بھی اختیار ہوگا اور ہر صورت مقدمہ کے تاریخ پیش مقدمہ کے دوران از پکھری صدر عدویٰ مقدمہ کے دفتر ثانی، اپیل، گمانی، ہر قسم کی مقدمہ یا مضمونی ڈگری ایک طرف یا درخواست حکم اختتامی یا قرضی یا گرفتاری میں از فیصلہ اجراء کے ذریعہ بھی صاحب موصوف کو یہ اختیار بھی ہوگا کہ مقدمہ کے دوران یا اس کے کسی جزو یا کارروائی یا بصورت درخواست نظر ثانی، اپیل، گمانی یا دیگر معاملہ مقدمہ کے دوران کی دوسرے وکیل یا ہر شخص کا پنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ایسے اقدامات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب سے ہوا وہ مقدمہ کا حق ہوگا اور صاحب موصوف کو پوری جس تاریخ پیش سے پہلے ادا کر دیں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی عدویٰ نہ کریں اور ایسی صورت میں جہاں کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا لہذا وکالت نامہ لکھ دیا ہے تاکہ مقدمہ ہے

نظر مورخہ 03 مارچ 2022ء

مضمون وکالت نامہ میں لیا ہے اور اسی طرح میں لیا ہے اور حضور ہے۔

خورشید خان ایڈووکیٹ

Accepted