

خدمت جناب راجندر سنگھ بٹوال صاحب

جناب عالی

خوارستہ میں آج ونگ 27/203 ڈسٹریکٹ

اسٹیشن 20/203 کا حاضر علی (17) CPD 14 ہے

میں جناب راجندر سنگھ بٹوال صاحب

مناظرہ و تربیت کی کہ اس ڈسٹریکٹ میں

میں ریکارڈ آج ہے آج جمع کر کے SCRI کر رہے

لہذا ان مہینوں سے رازداری کے ذریعہ مگر

ریکارڈ کی جمع کر کے کے ساتھ ساتھ

میں رازداری

الہ دین

آج کا لہذا مگر ذرا دکان

میں لہذا مگر ذرا دکان

Allowed as per rules

27/2/23

Next date: - 19⁵/₂₀₂₃

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3900

Dated 27/2/2023

I

CHARGE SHEET U/S 6(1)(a) KP POLICE RULE 1975.

You, accused HC Hazir Ali 665, posted at Operations staff CTD Mardan hereby charged for committing the following omissions/ commissions.

ANNEX I

"You, HC Hazir Ali 665 remained absent vide DD No.07 dated 18.12.2019 PS CTD Mardan Region. You were found involve vide case FIR No. 1303 dated 19-12-2019 u/s 381A/ 411/ 419/ 420/ 468/ 471/ 473/ 412/ 148/ 149 PPC PS City of District Mardan and the local police of PS City arrested you on the same date".

The undersigned hereby calls upon you to submit your written defence against the above charge before the enquiry officer.

Your reply must reach the enquiry officer within 07 days from date of receipt of this charge sheet, failing which ex-parte proceedings shall be initiated.

Summary of allegations are enclosed herewith.

Superintendent of Police,
CTD, Mardan Region.

No. 1070-63 /CTD

Mardan Dated 19/12/2019

Copy to: -

1. Worthy Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
2. SSP Operation CTD KP Peshawar
3. Accounts Branch CTD KP Peshawar.
4. DSP operations, CTD Mardan Region.
5. DSP Investigation, CTD Mardan Region.
6. All concerned.
7. HC Hazir Ali 665


Superintendent of Police
CTD Mardan Region.

SUMMARY / STATEMENT OF ALLEGATIONS U/R 6(1)(a) KP POLICE RULE 1975.

~~Ammer I/1~~

"You, HC Hazir Ali 665 remained absent vide DD No.07 dated 18.12.2019 PS CTD Mardan Region. You were found involve vide case FIR No. 1303 dated 19-12-2019 u/s 381A/ 411/ 419/ 420/ 468/ 471/ 473/ 412/ 148/ 149 PPC PS City of District Mardan and the local police of PS City arrested you on the same date".

DSP Investigation CTD Mardan Region, Mr. Farooq Khan is hereby appointed an enquiry officer in order to ascertain the factuality of alleged charge and to conclude the proceedings with in span of 15 days and to submit finding report.


Superintendent of Police,
CTD, Mardan Region.

ضلع مردان

خرد قبضہ ضلعی

تھانہ سی

381A-411-419-420-468
471-473-412-148-149

نمبر 1303 حوزہ 12/19/19 جسم

- 1) خاضر علی ولد میر خان ساہوکار حاکم ضلعی اسماعیل صوابی
- 2) سجاد عرف زبیر ولد محمد خاروقی شاہ ساہوکار سید سلطان بلال بن وکیل نمبر 28 سیکٹر A
- 3) سلم خان عرف ڈاکٹر سلیم ولد طاہر مس خان ساہوکار ڈیڑا او حاجی اشرف علی
- 4) آیاز و گدرا شاہ جہان ساہوکار سندھ پارہوئی

جوہر گوہان ذیل نمبر عنوان بالا میں مسلم خاضر علی کے مکان سے مسلحان مالک کے قبضہ سے حشر کار نمبر Ex-213 ماڈل 2015 بزرگ گریڈ نمبر 2) حشر کار نمبر LEF-4538 لاہور نمبر 451890 Z جس نمبر 4081681 NZE-170R بزرگ سلاخ 3) حشر کار نمبر B-5272 جس نمبر 7776 Z0 بزرگ سفید جس نمبر 6080088 NZE-120 4) حشر کار نمبر H-6287 جس نمبر 3510255 BARBL 5) سوزوکی پک اپ نمبر 6287 H جس نمبر جس نمبر 5 برآمد کر کے بمع آوزار ایک عمارت پتھوڑا رنگمال بکٹیشن ٹون ایک ڈبہ جس میں شیل نمبر 8 تا 8 موجود ہیں بڑے خرد قبضہ پولیس میں کر کے جبکہ حشر کار نمبر Ex-213 کو مذکورہ نمبر کے علاوہ نمبر 810 جسم 381A تھانہ نوا شپیر آبیٹ آباد میں بھی ملا ہے حال حشر رقم باز یافتہ بڑے خرد قبضہ پولیس میں کر کے خرد حوزہ برطرف کر کے گواہی خرد سے تشکیل خرد حوزہ برطرف کر کے

M
SHO-Ps-4
19-12-19

طمان

1) الع
حضرت الرحمن 1549 تھانہ سی

2) الع
ضیاء اللہ 1081 تھانہ سی

صباغی

بحوالہ چارج شیٹ اینڈ سرئی اف اسٹینڈ سرورٹ میں کہ عرصہ
۱۶ اگوست تقریباً ۱۹۸۶ء میں اسٹینڈ سرورٹ میں جو سرورٹ
یہ کامیٹیلان طائر علی اور راحت علی کے سرورٹ R18 میں جو پیشی
مخفی تاریخ میں روانہ ہوئے۔

ڈیوٹی سے فارغ ہو کر بوقت تقریباً ۱۰ بجے ٹھکانہ سے نکل کر گھر خود اسامیہ (عمراں)
جاری تھا۔ کہ بقا چوکی صف سرورٹ میں اور پھر مہر کار لبریا LEF-16-1538
روکی اسٹورٹ کار (کیٹا) اور جمع گاڑی اوکے کا اشارہ کیا۔ جب وہ گاڑی
روکی ترقی مذکورہ بالا سرورٹ کار سے DSP/R انعام جان و اینیلر عاشق H.H.S
SMT اینیلر طمس فراد H.H.S سٹی عیہ H.H.S مقدم ٹھکانہ سرورٹ
دریلر تقریباً ۱۹۸۶ء میں ڈیوٹی سے اتر آئے جنہوں نے یہ کیا کہ تم نے میری بیوی
عرف زینہ سائڈ بیچ نہیں تاون میں اس کے ساتھ رابطہ کر رکھا ہے۔ (ادام کے اسے
چھپایا ہے۔ اس کے ساتھ ہی مجھے اپنی سرورٹ کار لبریا LEF-16-1538 میں
مجھ صوابی اعیار الحق احوال کے ارد گرد کی سپرداوی تھی۔ میرے قریبی سٹی اور
ڈیوٹی کے سٹی H.H.S سٹی طمس فراد خان بیجو کو لاؤ فرٹ سٹی میں
انعام جان DSP/R اور H.H.S مقدم خان H.H.S عاشق اور H.H.S
SMT بیجو کے۔ اور میرے سرورٹ کار لبریا میں اس کے نام سے اسٹریٹ
میں جا کر جمع کر کے میں رخصت ہوئے۔ ہاں ہاں ہاں ہاں ہاں ہاں ہاں ہاں
مذکورہ بالا سٹیوں H.H.S کے جمعے کے دن ۱۲۔۱۹

جہاں پہلے حوالہ میں نہ لیا۔ اور جسے بتایا کہ ایک صلاف تعدادی ۱۱۱۸ میں Fix
 سرخی ہے۔ ۴۱۵ میں الزام لگایا گیا ہے۔ کہ ہم وقت وقوعہ فریم ہاؤس ۱۱۱۸ میں گلاب
 کی ٹیڈرٹ میں مورف کے انکوائری میں میں غیرت سے باہل ٹیڈرٹ کا CDR نکال
 کر میں لکھیں معلوم کیا جائے کہ کیا میں وہ آتی ٹیڈرٹ میں مورف تھا یا نہیں۔

میرے موبائل نمبر پر ۰۳۰۰۵۶۷۹۳۲۵ سے ۰۳۱۳۹۵۰۸۱۲۵

۳- ۰۳۱۴۹۳۹۰۱۹۸ سے ۰۳۴۲۹۰۲۵۹۰۷ سے ۰۳۴۲۹۱۵۹۴۳

یہ کہ مورف ۱۲/۱۶ تا ۱۲/۱۹ اور اس کے نام معلوم ہو گیا جس جہاں سے لگایا
 تھا۔ مورف ۱۲/۱۶ کو میں اپنی طرف سے سرور تھا۔ اور لگایا ہوئی ٹیڈرٹ میں
 مورفی اور اس کے لگایا گیا ہے اور میں موبائل فون نمبر، CDR میں

میں معلوم کیا جائے کہ مورف ۱۲/۱۶ اور وقت فریم سے لگے تھیں اور
 ساتھ رابطہ برآج۔ یا نہیں۔ اور مورف ۱۲/۱۶ سے تھیں مورف فون نمبر

اور میں۔ انکوائری میں معلوم کیا جائے کہ ہم وقت وقوعہ انہ ماڈل
 کی ٹیڈرٹ میں مورف تھا۔ اور یا SH سی ٹی جس حوالہ دی ہے

کے پاس موقع کی کوئی ونڈو یا تصویر موجود ہے۔ یا نہیں۔ جو ہم صلاف
 ٹیڈرٹ میں ہے۔ یا اس موقع میں کوئی نہ اسٹریٹ گواہ موجود ہے

یا نہیں میں کوئی ٹیڈرٹ یا کارڈیفکٹس لکھ لے اور (اس مقام
 الزامات میں حوث اب بنیاد ہے۔ انکوائری میں جانے وقوعہ ہاؤس

میں میں کون سا معلوم کیا جائے کہ میں مکان جہاں الزام ہے۔ کی ٹیڈرٹ وہاں
 سے ہے۔ وہ اس میں صحت کا کچھ اسٹانڈیڈ یا کچھ لکھنے کی الزام اور اس

کے خالی ہوا ہے۔ میں یہ جانہ ضرورتیں علیحدہ اور لکھنے کے ساتھ ساتھ ٹیڈرٹ

میں میں کون سا معلوم کیا جائے کہ میں مکان جہاں الزام ہے۔ کی ٹیڈرٹ وہاں
 سے ہے۔ وہ اس میں صحت کا کچھ اسٹانڈیڈ یا کچھ لکھنے کی الزام اور اس

محمد بہار الزام لگا یا گیا ہے۔ کہ بہار بقیع سے 21 گزبانالہ آمد ہو چکی ہے۔ (مذکورہ)
 گزبانالہ حار اضلاع مروری - صوابی - خارانہ - نوشہرہ کے لوگوں نے اعتراض کیا ہے
 قدرت کے انصاف کے حوالے سے بہار اور مروری کے مابین شہدہ ہے۔ ان گزبانالی
 متعلقہ H.C. - انصاف محسن خیراد (سید عابد عابد) جس (اور انصاف متعلقہ)
 دعوے کے بارے میں کہ لوگوں (اور مروری) کا تعلق ہے اور ان سے لاکھ جمع
 کیے ہیں اور (بہار باری) کے بارے میں کافر سے لاکھ جمع بننا اور دیکھ گیا۔ ام
 جانے ہوئے ہیں کہ مروری سے مروری ہے۔ تو کیا میں انہیں متعلقہ (اور مروری)
 کہ میں ان کے انصاف کے بارے میں کہ سبوں یا حوالہ ہوا ہے اور مروری۔

محمد بگڑے کے تمام الزامات عدالت اور بیسار بہ نسبتی پر ہی ہے۔ سب
 ساتھ انصاف کا حوالہ ہے تعلقہ وصلہ میں اللہ تعالیٰ اور انصاف اور انصاف
 پر حوالہ دیا ہے۔ میں گمان ہے کہ حوالہ میں حوالہ 12-20-23
 میں میں دن گسٹری پر ہے، اور مروری 12-23-2019
 اور انصاف کے متعلق عدالت لگا ہے (بہار انصاف)۔ عدالت حقیقت ہے
 منی ہے۔

21-12-2019

16202-0115795-5
 حوالہ H.C. 665
 CTD 111A
 Justice A.C.
 0300-5679370
 0313-9508120

①

Findings of Enquiry against Head Constable
HAZIR MOHAMMAD NO 665 OF CTD MARDAN.

Brief facts of the issue are that the above mentioned official was placed under suspension by the worthy Superintendent of Police CTD Mardan Region Mardan due to his alleged involvement in case FIR NO 1303/2019 as per contents of the copy of FIR placed on the enquiry file. The said official was then served with proper charge sheet under the prevailing rules, whereas the undersigned was appointed as enquiry officer.

During the course of enquiry the defaulting official submitted his reply to the charge sheet which was also placed on file. In the contents of his reply to the charge sheet the delinquent official totally denied all the allegations levelled against him.

To proceed further into the matter and to meet the ends of justice each and every aspect was touched in order to uphold the spirit of justice at its peak.

(2)

At the very beginning the service record of the alleged official was asked to be thoroughly scrutinized and for that very purpose necessary correspondence were made later on. This fact came to the surface that the service roll of the said official is in his personal possession and not available in the record room of CTD Hqs. In spite of all our efforts the service record in respect of the alleged constable was not produced which clearly highlights the influence and intention of the defaulter official. At the end of this episode a transfer order in respect of the alleged official was obtained the contents of which shows that prior to his posting to CTD he was transferred from FRP Mardam to district Battagram on complaint basis, whereas the copy of the said orders is also placed on the file. This act on the part of the said official remind us his indisciplined approach and violations of the existing norms of police force.

(3)

likewise the investigation site in which a case of car testing is under investigation against the alleged official was also approached, whereas all the relevant portions of documents which connected the accused official with the crime were also obtained. These documents show that, (20) motorcycles of different types stolen from different parts of the country have been recovered on the pointation of the accused officials. Moreover in this regard proper cases have also been lodged which support the story of prosecution. The photocopies of these recovery memos and FIRs are also placed on the enquiry file. In the same manner the accused official is also wanted in another separate case vide FIR NO 314 dated 01-08-2018 PS Tarnol Islamabad U/S 381-A SOR which proper jail warrant has also been issued. The said jail warrant U/S 54 Cr.P.C further strengthens the allegations against him and also highlights the criminal background of the accused official.

(A)

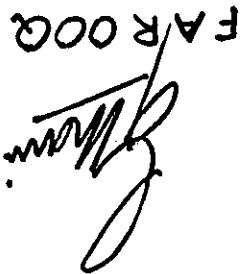
In the same fashion the statements of all other co-accused involved in one and the same case recorded u/s 161 Cr.P.C also drags the alleged official into the arena of crimes and criminals. The copies of these statements are also placed on file.

Likewise a secret information received from the highups, the contents of which shows that the accused official is allied with the gang of car lifters and car tempering teams. A copy of the said secret report is also placed on the enquiry file.

For what has been discussed earlier the proceedings of the enquiry, available admissible evidences, criminal background, secret reports and other relevant material placed on the enquiry file left this inx with no other option but to recommend the said official for major punishment. The exclusion of the said official from police force will not only save the honour and dignity of the force but will also set a precedent for other members of the force to refrain themselves from such like acts in future.

my this humble opinion is subjected to the approval of DSP CTD Mardan Region man

(5)



FAROOQ

DSP/inv/CTD MARDAN .
21/01/2020 .

33 34 SP-CTD-MRD
Annexure I
11/3



OFFICE OF THE SUPERINTENDENT OF POLICE
COUNTER TERRORISM DEPARTMENT
MARDAN REGION

No. 554/CTD/Mardan Region dated 17/04/2020

ORDER

My this order will dispose up departmental proceedings initiated against HC Hazir Ali No 665 while posted at operation wing CTD Mardan Region Mardan who was found indulge in the following allegations.

1. That the defaulter official has been directly charged in case vide FIR No 1303, dated 19-12-2019 u/s 381A, 411, 419, 420, 468, 471, 473, 412, 148, 149, PS City Mardan That the delinquent official has close contracts with other notorious car lifter who are also co-accused with him in a case of car lifting. In order to probe into the levelled allegations DSP investigation of CTD Mardan Region Mardan was appointed as an enquiry officer. The enquiry officer after doing the needful submitted his findings and the defaulter official was found guilty on the following grounds.
2. That the case file of case FIR No 1303, dated 19-12-2019 u/s 381A, 411, 419, 420, 468, 471, 473, 412, 148, 149, PS City Mardan reveals that on the pointation of the defaulter official about 18 lifted vehicles of different types which were lifted from different parts of the country from time to time have been recovered on his pointation. Moreover among these lifted vehicles 10 lifted vehicles are such in which proper cases have been lodged by their lawful owners. Copies of FIRs recovery memo and pointation sheet are also placed on file.

That the aberrant official is also involved in case FIR No 314 dated 31-07-2018 U/S 381A PS Tarnol Islamabad and in this regard proper jail warrant is also placed on file.

That a previous order of transfer placed on file in respect of the defaulter official which shows that he was transferred on complaint basis by the then RPO Mardan which further highlights that the said official has deliberately violated the disciplinary rules of police force and such like acts on the part of the said official has in fact earned a bad name for the police force.

For conducting probe into the allegation levelled against the defaulter official DSP investigation CTD Mardan Region Mardan was appointed as enquiry officer. The enquiry officer after doing the needful submitted his findings and found him guilty and recommended him for appropriate major punishment.

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The defaulter official was also served with final show cause notice and was directed to submit his reply. The delinquent official submitted his reply to the show cause notice but the same was also found unsatisfactory.

Therefore being the competent authority and exercise of the power vested in me under Police Rule 1975 I Superintendent of Police CTD Mardan Region hereby impose upon him major punishment of dismissal from service with immediate effect. He is directed to deposit all the Govt articles allotted to him to the concerned branches of this unit.

Superintendent of Police,
CTD, Mardan Region

No. 554-58 Dated 17-04-2020

Copy to

1. The Deputy Inspector General of Police, CTD KP Peshawar ✓
2. Regional Police officer Mardan Region, Mardan
3. District Police Office Mardan.
4. All Concerned



OFFICE OF THE,
DEPUTY INSPECTOR GENERAL OF POLICE,
COUNTER TERRORISM DEPARTMENT,
KHYBER PAKHTUNKHWA, PESHAWAR.

Amir J 13

ORDER

Ex-Head Constable Hazir Ali No. 665-MR posted in operation staff of CTD Mardan Region was involved in case vide FIR No. 1303 dated 19-12-2019 U/S 381/A-411-419-420-468-471-473-412-148-149 PPC PS City. He was issued a charged sheet by SP CTD Mardan Region and DSP Investigation Mardan Region was nominated as inquiry officer. The enquiry officer submitted his findings and the above named official was declared guilty and recommended him for major punishment. According on 17-04-2020 SP CTD Mardan Region dismissed him from service. The applicant submitted the departmental appeal before the Worthy Deputy Inspector General of Police CTD Khyber Pakhtunkhwa for consideration. However, the competent authority has called the applicant for personal hearing, after hearing the Competent Authority has filed his appeal.

OB No. 150 CTD
Dated: 21/05/2020

[Signature]
SP/HQrs:
For Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa,
Peshawar.

No 4771-74
IEC/CTD

Dated Peshawar the

21/05/2020

Copy of above is forwarded for information and necessary action to the:-

- i. Ex-Head Constable Hazir Ali No. 665-MR.
- ii. Accountant, OASI, SRC CTD HQrs: Peshawar.

37
Annex J / 1
(19)

**BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE CTD,
KPK, PESHAWAR**

Subject: APPEAL AGAINST THE ORDER OF SUPERINTENDENT OF POLICE, CTD, MARDAN REGION, ISSUED VIDE HIS OFFICE ENDST NO. 554-58 DATED 17-04-2020, WHEREBY THE APPELLANT WAS AWARDED MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE.

Respected Sir,

Your Honour had issued the Charge Sheet & statement of allegation No. 4046-53/CTD dated 19/12/2019 to the appellant with the following allegation:

"Whereas, You IIC Hazir Ali 665 remained absent vide DD No. 07 dated 18-12-2019 PS CTD Mardan Region. You were found involved vide case FIR No. 1303 dated 19-12-2019 u/s 381A/411/419/420/468/471/473/412/148/149 PPC PS city of District Mardan and the local police of PS city arrested you on the same date".

1. It is submitted that during the month of December 2019 the appellant remained posted at Police Station CTD Gujar Garhi Mardan. On 17/12/2019 the appellant proceeded on Night pass to village Ismaila in his motorcar No. LEF-1538. On reaching near PP Sang-e-Marmar the appellant was signaled by Police party and stooped his car. Inspector Mohsin Fawad SHO PS City along with Police party arrested the appellant and brought him to some unknown place where he was kept till 19/12/2017. On 19/12/2017 the appellant was shown to be arrested in case FIR No. 1303 U/S 381A/411/419/420/468/471/473/412/148/149 PPC PS city of District Mardan. (copy of FIR No, 1303 is enclosed)
2. That while in custody of PS City Mardan, the appellant was handed over charge sheet + summary of allegations by SP CTD Mardan. In response to the charge sheet the appellant submitted a detailed reply showing himself to the innocent in the case, but the same was not considered. (copy of charge sheet is enclosed)
3. That after the arrest of the appellant and further needful investigation the appellant was sent to judicial lock up. During confinement in jail the appellant was issued final show cause notice. The appellant again submitted his reply in response to the F.S.C.N but was not considered.
4. That on 19-03-2020 the appellant was released on bail by the Honouable High Court Peshawar vide his Order No. Cr. MBA No. 589-P of 2020 dated 19/03/2020. The appellant was released from jail on 16/04/2020. On the day of release from jail the appellant contacted OSI Javed of CTD Office Mardan regarding his release on his mobile No.

47 38
(15)

0314-9960006. On 17/04/2020 the appellant was informed that he has been dismissed from service in connection of departmental enquiry, initiated against him in his absence. On 18/04/2020 the appellant visited the office of SP CTD Mardan and received a copy of dismissal order issued vide his Office Endst No. 554-58 dated 17-04-2020. (copy enclosed)

5. That the alleged departmental enquiry was conducted in the absence of appellant for alleging him in mere involvement in criminal case registered vide FIR No. 1303 of PS City Mardan. During the alleged enquiry the appellant was not given an opportunity of cross examination upon the witnesses. Similarly the appellant was not given the opportunity of personal hearing. All such departmental proceeding amounts to an ex-parte action. The enquiry so conducted was not according to the law & rules. Being aggrieved from the order of SP CTD Mardan the appellant submits the PRESENT APPEAL.

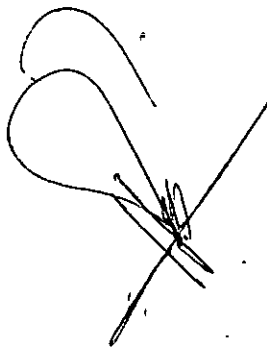
BRIEF FACTS OF THE INCIDENT:

Respected Sir,

1. It is submitted that the appellant was implicated in a false and baseless criminal case registered vide FIR No. 1303 dated 19/12/2019 U/S 381A/411/419/420/468/471/473/412/148/149 PPC PS city of District Mardan. From the perusal of contents of the FIR and other connected documents of the alleged investigation the appellant came to know that a police raid was shown to be conducted over the house of the appellant by SHO Mohsin Fawad on 19/12/2019. In the said alleged raid, the recovery of 05 motor cars have been shown from the house of appellant which details is as under:

- a) Motorcar No. EX-213 Islamabad
- b) Motorcar No. LEF-1538
- c) Motorcar No. LZO-7776
- d) Motorcar No. B-5272 Peshawar
- e) Suzuki Pickup No. H-6287 Peshawar

Similarly this has been mentioned in the FIR that during the raid beside the appellant, others accused Sajjad, Saleem Khan and Ayaz were also present and were found busy in tempering of the above mentioned vehicles. Unfortunately the false recovery of the 05 vehicles and arrest of 03 persons were shown in the FIR from the house of the appellant which is a false and concocted story.



REASONS OF APPEAL.

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(16)

- i. The appellant is innocent and has been falsely implicated in the criminal case. The alleged departmental enquiry conducted against the appellant is not according to the law and rules. The appellant was not given any opportunity of defence or cross examination upon the witnesses. Similarly no opportunity of personal hearing was given to the appellant and hence an EX-PARTE action was taken against him.
- ii. No raid was conducted on the house of the appellant. Neither any recovery of 05 motorcars has been effected from the house of appellant, nor any other accused who were found present busy in tempering the chassis No. of vehicles were arrested from the house of the appellant.
- iii. That a false concocted story was framed by the Police against the appellant and registered a fake FIR against him.
- iv. That in fact the appellant was arrested on 17/12/2019 near PP Sang-e-Marmar at 14:00 hrs while he was traveling in Motorcar No. LEF-1538 to his village Ismaila. The said car was given by the Court of Mr. Ijaz-Ul-Haq Awan ADJ Lahore to the appellant on Supardari. The original documents i.e. registration Copy + courts orders were handed over to the SHO Mohsin Fawad at the time of arrest. (copy of the documents enclosed)
- v. That during the alleged investigation no any prosecution witness from the public was associated and the entire proceeding of investigation were conducted in the presence of police witnesses, which makes the matter doubtful.
- vi. That there is no single iota of evidence against the appellant to connect him with the commission of offence. There is no possibility of the conviction of accused in the instant case. The appellant is totally unaware about the reasons behind his involvement in the instant case.
- vii. That while granting bail to the petitioner the Honourable Peshawar High Court Peshawar has made the following observations:

"That the appellant is not charged in the FIR by name. The SHO Mohsin Fawad while recovering the cars in question have charged other person for the commission of offence hence the vicarious liability on the part of the appellant is yet to be determined during trial stage of after recording pro and contra evidence. Further more in none of the FIRs so placed on file the appellant is charged".
- viii. The fate of the case has yet to be decided from the court. The competent authority was required to keep pending the departmental enquiry till to the

40

final judgment of the trial court but unfortunately the appellant was also deprived from this fundamental right.

- ix. The alleged recovery of the vehicles shown in the FIR is fake and bogus. All the motorcars which have been allegedly shown to be recovered from the house of the appellant were properly obtained by superdari by the competent court of law. These vehicles were in the custody of the different people (almost police officials) and later on collected by the SHO Mohsin Fawad from the concern persons which were lastly shown as recovery in the instant case. (all the relevant documents pertaining to the above 05 vehicles are enclosed)
- x. This was the basic need of the investigation of the criminal case that while affecting the recovery of stolen cars the investigation agency used to carry the photography of the same process. As this was a false story therefore no photography was affected in this regard.
- xi. A man can tell a lie but the spot can't. the place which have been shown to be the house of the appellant. from where the alleged 05 motorcars have been recovered is not a constructed house. This is a plot measuring 05 marlas where 05 vehicles cannot be accommodated at any cost. (the photography of the said plot is enclosed as a proof)
- xii. YOUR HONOUR the appellant can swear upon the Holy Quran that no any kind of recovery of motorcar was affect from his possession except motor car No. LEF-1538 which was already on superdari with the appellant by the competent court of law.
- xiii. The appellant was enlisted as Constable in Police Department on 25/05/2006 and since then the appellant perform with zeal and efficiency the appellant was never punished throughout the entire period of service which is evident from the shining service record of the appellant.
- xiv. The appellant is married with 03 kids and old parents. All the family is depend upon the Police Service of the appellant.

Keeping in view the above facts and circumstances, it is humbly requested that on the acceptance of the instant appeal, the order of SP CTD Mardan Region may kindly be set-aside and the appellant be reinstated in service from the date of dismissal please.

Yours Obediently,

Hazir Ali
Ex-Head Constable
No. 665-MR
Operational Staff CTD Mardan.
Cell: 0346-0902540

Dated: 22/04/2020

FINDINGS OF ENQUIRY AGAINST HEAD CONSTABLE HAZIR MUHAMMAD NO.665 OF CTD MARDAN.

Brief facts of the issue are that the above mentioned official was placed under suspension by the worthy superintendent of police CTD Mardan Region due to his alleged involvement in case FIR No 1303, dated 19-12-2019 u/s 381A,411,419,420,468,471,473,412,148,149, PS City Mardan as per contents of the copy of FIR placed on the enquiry file. The said official was then served with proper charge sheet under the prevailing rules, whereas the undersigned was appointed as enquiry officer.

During the course of enquiry the defaulter official submitted his reply to the charge sheet which was also placed on file. In the contents of his reply to the charge sheet the delinquent official totally denied all the allegations leveled against him.

To proceed further into the matter and to meet the ends of justice each and every aspect was touched in order to uphold the spirit of justice at its peak. At the beginning the service record of the alleged official was asked to be thoroughly scrutinized and for that very purpose necessary correspondence were made. Later on this fact came to the surface that the service roll of the said official is in his personal possession and not available in the record room of CTD HQRs. In spite of all out efforts the service record in respect of the alleged constable was not produced which clearly highlights the influence and intentions of the defaulter official. At the end of this episode a transfer order in respect of the alleged official was obtained, the content of which shows that prior to his posting to CTD he was transferred from FRP Mardan to district Battagram on complaint basis, whereas the copy of the said orders is also placed on the file. This act on the part of the said official remind us his in-disciplined approach and violations of the existing norms of police force.

Likewise the investigation file in which a case of car lifting is under investigation against the alleged official was also approached, whereas all the relevant portion of documents which connected the accused official with the crime were also obtained. These documents show that, 20 motorcars of different type stolen from different parts of the country have been recovered on the pointation of the accused official. Moreover in this regard proper cases have also been lodged which supports the story of prosecution. The photocopies of these recovery memos and FIRs are also placed on the enquiry file.

In the same manner the accused official is also wanted in another separate case vide FIR No. 314 dated 01-08-2018 PS Tarnol Islamabad u/s 381-A for which proper jail warrant has also been issued. The said jail warrants u/s 54 CRPC further strengthens the allegations against him and also highlights the criminal background of the accused official.

In the same fashion the statement of all other co accused involved in one and the same case recorded u/s 161 CRPC also drags the alleged official into the arena of crimes and criminals. The copies of these statements are also placed on file.

Likewise a secret information received from the high ups, the contents of which shows that the accused official is allied with the gang of car lifters and car tempering teams. A copy of the said secret reports is also placed on the enquiry file. For what has been discussed earlier the proceedings of the enquiry, available admissible evidences, criminal background, secret report and other relevant material placed on the enquiry file left this ink with no other option but to recommend the said official for the major punishment.

The exclusion of the said official from police force will not only save the honor and dignity of the force but will also set a precedent for other members of the force to refrain themselves from such like acts in future.

My this humble opinion is subjected to the approval of Worthy SP CTD Mardan Region.



FAROOQ
DSP INVESTIGATION CTD MARDAN



2

(20)

**OFFICE OF THE SUPERINTENDENT OF POLICE
COUNTER TERRORISM DEPARTMENT
MARDAN REGION
Ph & Fax: 0937-9030374**

No. 4057 CTD/Mardan Region dated 20 / 12 / 2019

**To: The Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa, Peshawar.**

Subject: SUSPENSION OF SALARY.

Respected Sir,

As per report of SHO PS CTD Mardan Region, it is submitted that HC Hazir Ali No.665 was on his routine leave (Shabashi) and was supposed to return back on 18.12.2019. Upon failing of his return, the said HC was marked absent vide DD No. 07 dated 18.12.2019 PS CTD Mardan Region.

It is pertinent to mention here that following day of his absentee i.e. on 19.12.2019, local Police of PS City District Mardan Region arrested the said HC upon his involvement vide case FIR No.1303 dated 19.12.2019 u/s 381A/411/419/420/468/471/473/412/148/149 PPC PS City District Mardan. The undersigned, after intimated by DSP Operations CTD Mardan Region, immediately kept him under suspension vide this office letter No. 4038-45/ CTD Mardan Region dated 19.12.2019 and issued charge sheet to the accused HC vide this office letter No. 4046-53/CTD Mardan Region dated 19.12.2019 and preceded him departmentally.

It is, therefore, requested that his salary may please be stopped with immediate effects till further orders, please.

**Superintendent of Police,
CTD Mardan Region**

No. 4057-61 /CTD Mardan Date 20 / 12 / 2019

Copy to:

- 01) Superintendent of Police, HQr CTD Peshawar.
- 02) Account Branch, CTD Peshawar.
- 03) DSP, Operations CTD Mardan Region
- 04) OSI, Mardan Rrgion.

**Superintendent of Police,
CTD Mardan Region**



OFFICE OF THE SUPERINTENDENT OF POLICE
COUNTER TERRORISM DEPARTMENT
MARDAN REGION

No. 4038 /CTD/Mardan Region dated 19/12/2019

ORDER

As per intimation of DSP Operations CTD Mardan Region, HC Hazir Ali 66 posted in Operations staff CTD Mardan Region was absent vide DD No. 07 dated 18.12.2019 PS CTD Mardan Region. As the above mentioned HC has been involved and arrested vide case FIR No. 1303 dated 19-12-2019 u/s 381A/ 411/ 419/ 420/ 468/ 473/ 473/ 412/ 148/ 149 PPC PS City of District Mardan, the undersigned within the meaning of rules, 16.17, 16.18 PR 1934, hereby immediately places him under suspension with charge sheet and summary of allegation issued to him.


Superintendent of Police
CTD, Mardan Region.

No: 4038-45 CTD Mardan

Dated 19/12/2019

Copy to:-

1. Worthy Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
2. SSP Operation CTD KP Peshawar
3. Accounts Branch CTD KP Peshawar
4. DSP Operations CTD Mardan Region.
5. DSP Investigation, CTD Mardan Region
6. All concerned
7. HC Hazir Ali 665


Superintendent of Police
CTD, Mardan Region.

5

CHARGE SHEET U/S 6(1)(a) KP POLICE RULE 1975.

(22)

You, accused HC Hazir Ali 665, posted at Operations staff CTD Mardan hereby charged for committing the following omissions/ commissions.

"You, HC Hazir Ali 665 remained absent vide DD No.07 dated 18.12.2019 PS CTD Mardan Region. You were found involve vide case FIR No. 1303 dated 19-12-2019 u/s 381A/ 411/ 419/ 420/ 468/ 471/ 473/ 412/ 148/ 149 PPC PS City of District Mardan and the local police of PS City arrested you on the same date".

The undersigned hereby calls upon you to submit your written defence against the above charge before the enquiry officer.

Your reply must reach the enquiry officer within 07 days from date of receipt of this charge sheet, failing which ex-parte proceedings shall be initiated.

Summary of allegations are enclosed herewith.

Superintendent of Police,
CTD, Mardan Region.

No 4046-53 /CTD

Mardan Dated 19/12/2019

Copy to: -

1. Worthy Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
2. SSP Operation CTD KP Peshawar
3. Accounts Branch CTD KP Peshawar.
4. DSP operations, CTD Mardan Region.
5. DSP Investigation, CTD Mardan Region.
6. All concerned.
7. HC Hazir Ali 665

Superintendent of Police
CTD Mardan Region


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23,

SUMMARY / STATEMENT OF ALLEGATIONS U/R 6(1)(a) KP POLICE RULE 1975.

“You, HC Hazir Ali 665 remained absent vide DD No.07 dated 18.12.2019 PS CTD Mardan Region. You were found involve vide case FIR No. 1303 dated 19-12-2019 u/s 381A/ 411/ 419/ 420/ 468/ 471/ 473/ 412/ 148/ 149 PPC PS City of District Mardan and the local police of PS City arrested you on the same date”.

DSP Investigation CTD Mardan Region, Mr. Farooq Khan is hereby appointed an enquiry officer in order to ascertain the factuality of alleged charge and to conclude the proceedings with in span of 15 days and to submit finding report.


**Superintendent of Police,
CTD, Mardan Region.**

3 12
2019

منجور

فرد تقبوضی

25

نقد و عملیات 1303 صم 19-12-19
 391A-411-419-420
 468-471-473
 148-149
 نام: حافظ علی ولد عزیز خان

موجودگی گواہان زیر سلاطین با انستاف پرسونل و غیره
 1739 LWQ
 CE100-9008749
 1210 LKM
 NZE140-2832224
 NZE120-604063
 NZE120-6033037
 261 FSM
 22E1219004481
 CE1200019557
 0323
 NZE.1206070119
 8495 LZQ
 4035 LEP
 7010 LRP

M
 MSP. 310.
 20-12-19

الذی
 نقل 1849 قاسمی

الانستاف
 نقل 2055 قاسمی

ضلع مردان

خرد حضور ضلعی

تھانہ سی

381A-411-419-420-468
471-473-412-148-149

نمبر 1303 حرقہ 19/12/19

- 1) خاضع علی ولد منیر خان ساک حشم خنی خیل اسماعیلہ صوابی
- 2) سجاد عرف زبیر ولد محمد خاروق شاہ ساک سیخ خلتون ملاڈن وکان نمبر 28 ساک A
- 3) سلیم خان عرف ڈاکٹر سلیم ولد طاووس خان ساک ڈیڈا او حاجی اشرف علی خانی
- 4) آیاز ولد شاہ جهان ساک سندھ پارہوئی

روبرہ گواہان ذیل نمبر ح عنوان مالا میں مسلم حاضر علی کے مکان سے مسلحان مالک کے قبضہ سے حرقہ کار نمبر Ex-213 ماڈل 2015 برنگ گرے نمبر 2 حرقہ کار نمبر LEF-1538 ایمر سخن نمبر 451890-Z جس نمبر 4081681 NZE-170R برنگ سلور 3 حرقہ کار نمبر بی بی 7776-ZO برنگ سفید جس نمبر NZE-120-6080088 4 حرقہ کار نمبر B-5272 نیسان جس نمبر BAABL-3510255 5 سوزوکی پاک اپ نمبر H-6287 حکا جس نمبر جس نمبر 5 برآمد کر کے بمع آوزار ایک سردار پنچوڑا رنگمال پنشن ٹون ایک ڈیو جس میں شیل نمبر 8 تا 10 موجود ہیں برنگ خرد قبضہ پولیس میں کر کے جبکہ حرقہ کار نمبر Ex-213 کو مندرہ نمبر کے علاوہ نمبر 1/810 حرقہ کار نمبر 381A تھانہ نوا شیر آبٹ آباد میں بھی ملے حال حرقہ رقم باز بافندہ برنگ خرد قبضہ پولیس میں کر کے خرد حرقہ بر وقت کر کے گواہان خرد سے فلیس خرد حرقہ بر وقت کر کے

M
SHO-Ps-4
19-12-19

مکان

1) حفتاح الرحمن 1549 تھانہ سی

2) ضیاء اللہ 1081 تھانہ سی

499

(27)

FINAL SHOW CAUSE NOTICE

You, accused HC Hazir Ali 665, posted at Operations staff CTD Mardan hereby charged for committing the following omissions/ commissions.


"You, HC Hazir Ali 665 remained absent vide DD No.07 dated 18.12.2019 PS CTD Mardan Region. You were found involve vide case FIR No. 1303 dated 19-12-2019 u/s 381A/ 411/ 419/ 420/ 468/ 471/ 473/ 412/ 148/ 149 PPC PS City of District Mardan and the local police of PS City arrested you on the same date".

The undersigned, upon your involvement in above mentioned FIR, suspended you and initiated a departmental inquiry vide this office Letter Nos. 4038 and 4046-53/ CTD Mardan Region dated 19.12.2019, respectively.

Mr. Farooq Khan: DSP Investigation CTD Mardan Region, conducted an inquiry in the matter and you were fully given a chance to submit your written reply and defend yourself against allegations levelled against you. Inquiry officer thoroughly scrutinized and dig out reality in the matter. Your written reply could not satisfy the inquiry officer who suggested "major punishment".

Keeping in view findings of the inquiry officer, you are once again given a chance and issued this final show cause notice to you to prove your innocence and submit your written reply to the enquiry officer for his satisfaction that why should you not be dealt with suggested major punishment.

Your reply must reach the enquiry officer within 07 days from date of receipt of this final show cause notice.


Superintendent of Police,
CTD, Mardan Region.

No 174-87 /CTD

Mardan Dated 28/01/2020

Copy to: -

1. Worthy Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
2. SSP Operation CTD KP Peshawar
3. Accounts Branch CTD KP Peshawar.
4. DSP operations, CTD Mardan Region.
5. DSP Investigation, CTD Mardan Region.
6. All concerned.
7. HC Hazir Ali 665


Superintendent of Police
CTD Mardan Region

تیار CTD
-x-

تقریر تاریخ روز تاریخ 18/12/2019

ن ریسی
17/12/19

وزیر رپورٹ سیکرٹری حاکم - SHCO عیادت 18/12/19 وقت 11:45 ع

دوڑتھیکے حاکم علی 665/42 کل روز 17/12/19 وقت 11:30 ع 23 گھنٹے وقت تناسی

پہر چھوڑا گیا تھا۔ جسکا آج والی مطلوب ہے۔ کمانڈر انتظار کے بارے میں مذکورہ
والی نہیں آیا جسکے ساتھ جو مائیل ہیرا الیگڑک جو مائیل رابع ہیں

اور جو مائیل کمال بند آرلم ہے۔ جس میں مذکورہ سرپرست غنیمت حاکم

آند پر بعض بیانیہ کارکن تعینادات مراد صاحب حکم آؤں اور ان کو ارسال ہوگا

جایالی

تقریر از اصل ہے
[Signature]

Forwarded PL

[Signature]
SHCO/CTD/PL
Reg

M.M/PL-CTD-Mardam 18/12/2019
18/12/19

Sir,

Forwarded PL

[Signature]

PL/OPP

18.12.19.

تیا CTD
-x-

تعمیراتی روز 18/12/19

ن ریس
17/12/19
-x-

ورج 18/12/19 وقت 11:45 ع

رپورٹ سیرفولک - SHCO عیادت

ورج 17/12/19 وقت 11:30 ع 23 گھنٹے سخت شناسی

ورج 17/12/19 وقت 11:30 ع 23 گھنٹے سخت شناسی
پر چھوڑا گیا تھا۔ سکا آج والی مطلوب ہے۔ کمان انتظار کے باوجود مذکورہ
والی نہیں آیا۔ کے ساتھ وہاں پر اب اس کے جو وہاں اب اس کے
اور وہاں کمال بند آ رہا ہے۔ یہاں مذکورہ سرپرست سیرفولک
آج پر بعض بیانات کار تعمیرات مراد ماسٹ حکم آج اور ان کو اس کے

جا عالی

تعمیراتی
-
M.M/Ps

Forwarded FL
SHCO CTD
18/12/2019

M.M/Ps - CTD - Mardam 18/12/2019
187121019

Sir,
Forwarded fl.

PP/OPP
18.12.19.

کمانر CTD

دران زخم

تعداد 10 روزہ اخیر 19-12-2019

رپورٹ انسپکٹرنیٹ خان SHO کمانر CTD دران زخم وقت 59.45 بجے حورح

19-12-2019 درج صفیہ ابی ابی معلوم ہوا کہ پینسل حاضر علی 665 جو کہ بخوالہ صدر 07

روزنامہ 18-12-2019 بند شدہ سے بدستور غیر حاضر تھا جو کہ بخوالہ صدر 1303

حورح 19-12-2019 جم 148-412-473-471-468-420-419-411-381A

کمانر سہی دران میں SHO صاحبہ کمانر سہی سے سرقر شدہ حور کار کیا کو عمر
دیگر ملزمان کیا کو گرفتار کیا ہے۔ رپورٹ درج جو کہ تعداد جو میں مناسب
کارروائی اخراں نالا کی خدمت میں ارسال ہوگا۔

صاحب عالی

کمانر ابی ابی

(MASI - PS CTD MRD
19-12-2019

Forwarded to

SHO CTD / Garden
Region

19-12-2019

Forwarded

SP / UPPS / MR
19/12/19

Central Police Office, Peshawar

The Supdt. of Police

1665

28-11-2018

Asst. Range Peshawar ORDER.

The following Upper/Lower Subordinates of Mardan Region are hereby

S.#	NAME & RANK	FROM	TO
1.	ASI Salamat No. 761/MR	Mardan District	Upper Kohistan
2.	HC Hameed Ullah Bangash 1952	-do-	Torghar District
3.	Constable		

Sd/-
SHER AKBAR
PSP, S.St

Deputy Inspector General of Police HQrs:
For Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

No. 2427-36 E-III Dated Peshawar, the 23/11/2018.

Copy of above is forwarded for information and necessary action to the:-

1. Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
2. Commandant FRP, Khyber Pakhtunkhwa Peshawar.
3. Regional Police Officer Mardan Region, Mardan w/r to his office letter No. 7449/ES, dated 20.11.2018.
4. Regional Police Officer, Hazara Region, Abbottabad.
5. District Police Officers, Mardan, Torghar, Upper Kohistan & Battagram.
6. Office Supdt: E-IV, Section CPO, Peshawar.

(SADIQ BALOCH)PSP
AIG Establishment
For Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

OFFICE OF COMDT. FRP (P), Peshawar
No. 12020 E-III dated 27/11/2018.

Copy of above is sent to SP
FRP Peshawar Range for further necessary action.

Handwritten notes:
FC
For info
SP/AC/OPS
For further info
SP/FRP/PA

Handwritten notes:
For Commandant FRP
Peshawar

(جیل وارنٹ)

بعدالت جناب اعجاز الرحمان صاحب سینئر سول جج مردان

بحوالہ مد 16 روزنامہ 19/12/19 تھانہ سس

زیر دفعہ 54 ض ف

بنام:- 10 صرخی وزیر مسر 4 جن کے محلہ جی میں اسٹیشن ہوائی

سپرٹنڈنٹ جیل مردان

ملزم بالا زیر دفعہ 54 ض ف گرفتار ہو کر جوڈیشل بچھوایا جاتا ہے۔
چونکہ ملزم بحوالہ مقدمہ

علت 3/4 مورخہ 8/20/81 جرم 381A

تھانہ سس

مطلوب ہے لہذا ملزم بالا تا آمد اور منتقلی مقامی پولیس حوالات جوڈیشل
میں رکھا جا کر مورخہ

کو عدالت میں پیش کریں

02/01/2020

Senior Civil Judge, Mardan

خواجہ خاضل شوکانہ نوٹسین چارج جناب SP/AD مردان کے
 بناؤ طاہر علی / 665/146 CTD ایپریٹن سٹاف مردان معروفین خدمت یوں کہ
 خواجہ مقدم علی 1300 فورم 12/2019 9 اتھان سٹی مردان میں گرفتار ہو کر مردان سنٹرل جیل
 میں زیر سرانت یوں۔ FIR میں جوڑے الزامات لگا کر گرفتار کیا گیا ہے۔

① یہ کم FIR میں درج شدہ الزامات غلط اور بے بنیاد ہیں۔ اور تمام کارڈز یاں DPo
 مردان نے مردان کے قلم نویسین کے نوٹسین لائین مردان میں جمع کر کے SHD سٹی نے بیمار نے
 صلاح مقدمہ متذکرہ بالا درج الزامات لگا کر گرفتار کیا ہے۔ صلاح تمام کارڈز یاں مختلف
 عدالتوں سے سپرد دار یوں پر رہنمائی ہے۔ سپرد دار یوں کی آرڈر نقل موجود ہیں۔

② یہ کم FIR میں ایک فوٹو کارڈ لکھنے کے ساتھ ساتھ دھوکے آرتے خواجہ سہیل سہیل کی 1135 فورم 7-12-19
 سے سرچ ٹرہ تھا اور سہیل علی علی نے تھا۔ رحیم شاہ ولد نواب علی خان سنگھ پٹا ورنہ
 فریڈم لکھنے کے ساتھ ساتھ وصول کر کے لکھ لیا۔ اور فوٹو کارڈ لکھنے میں فریڈم لکھنے کے لیے لکھ لیا
 کا (سہیل سہیل کی کاپی ہمراہ لکھی ہے)۔ اور فوٹو کارڈ لکھنے میں فریڈم لکھنے کے لیے لکھ لیا
 فورم 12/2019 17 کو تھا کہ CTD مردان سے ڈیوٹی سے خارج ہو کر فخر خود صوبائی جیل گیا
 مقام جوگی سنگھ مردان سے لکھنے سے گرفتار شدت SHD سٹی جس فوارہ HD کی مانتھ معرکہ
 فوری نوٹسین کے فوجی اوک لیا۔ اور جوگی معیارے جا کر 3 دن جس بے جا رہ کر جس سہیل علی
 SHD سٹی جس فوارہ سٹی کے صلاح مردان سیشن جج کو 491 کے طے درخواست دائر کر کے
 صلاح مقدمہ متذکرہ بالا درج الزامات لکھ لیا۔ اور سہیل علی علی نے لکھ لیا۔ اور سہیل علی علی نے لکھ لیا۔

جناب عالی! عدالت کے ٹرائل میں فیصلہ تک میں اپنی تائید تائیدی ثابت نہیں کر سکتا۔ آپ تمام افسران بالا
 سے استدعا کرتا ہوں کہ جن مسائل کے ساتھ رجسٹرڈ فرما کر عدالتی فیصلہ تک میری سیشن جاری
 رکھی جائے۔ تاکہ میں اپنی نوکری کا دفاع کر سکوں۔
 30/11/2020 5-5795-01157-2020