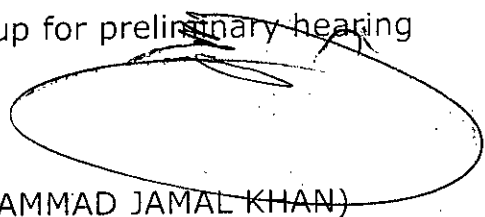


13.01.2021

Appellant is present in person. He seeks adjournment on the ground that his counsel is not available today. Adjourned to 13.04.2021 on which date file to come up for preliminary hearing before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

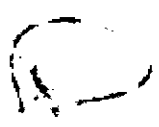
13.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 03.08.2021 for the same as before.


Reader

03.08.2021

Counsel for the appellant present.

 A copy of order issued by S.S.P Operation, Peshawar under his office endorsement No. 2774-78/PA, dated 04.12.2020 has been produced, whereby services of the appellant have been reinstated for the purpose of denovo proceedings. Counsel for the appellant, in view of the change situation, requested for withdrawal of the appeal.

In view of the above, the appeal at hand is dismissed as withdrawal. File be consigned to the record room.


Chairman

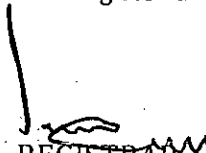
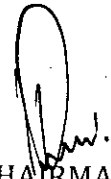

ANNOUNCED
03.08.2021

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 10517 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/09/2020	<p>The appeal of Muhammad Ishaq resubmitted today by Mr. Rashid Rauf Swati Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	28.10.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/10/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant in person present.</p> <p>Lawyers are on general strike, therefore, case is adjourned to 13.01.2021 before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

The appeal of Mr. Muhammad Ishaq son of Abdul Mateen Ex-Constable Khyber Pakhtunkhwa Police Peshawar received today i.e. on 18.08.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 2- Copy of impugned order is illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be attested.
- 4- Annexures of the appeal may be flagged.
- 5- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2580 /S.T,

Dt. 02/09 /2020



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rashid Rauf Swati Adv. Pesh.

Respectfully Submitted
That filing of departmental appeal
is mentioned in para 5 of Appeal,
copy is not available therefore
receipt / Diary number is annexed.
Appellant has verified the contents
of appeal on oath by accompanying
affidavit.

Better copy of impugned order
annexed / placed as record.
Annexures of Appeal have been
attested and flagged. Five
copies / sets are ~~now~~ provided.

Resubmitted please.


10/09/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Muhammad Ishaq Son of Abdul Mateen, Ex Constable Khyber
Pakhtunkhwa Police, Resident of Hazar Khawani Tehsil &
District Peshawar.

(Appellant)

Versus

The Inspector General Police Khyber Pakhtunkhwa Peshawar and
Others

(Respondents)

INDEX

S No.	Description of Documents	Annexure	Pages
1.	Appeal		1-4
2	Affidavit		5
3	Appointment Order of Appellant	A	6
4	Notification dated 08/04/2020 and Better Copy.	B	7-8, 7A-7B.
5	Copy of FIR and Better Copy	C	9 and 9A
6	Impugned Order/Notification Dated 31/03/2020 and Better Copy	D	10 and 10A
7	Copy of Receipt/Diary No	E	11
14	Wakalatnama		12.

Muhammad Ishaq (Appellant)

18/08/2020 11/18/08/2020 Through
Rashid Rauf Swati & Zele Huma Advocates

Peshawar

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Muhammad Ishaq Son of Abdul Mateen, Ex Constable Khyber Pakhtunkhwa Police, Resident of Hazar Khawani Tehsil & District Peshawar.

(Appellant)

Versus

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 8954

Dated 18-8-2020

1. The Inspector General Police Khyber Pakhtunkhwa Peshawar
2. Capital City Police Officer (CCPO) Peshawar
3. Superintendent of Police Rural Peshawar

(Respondents)

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE ORDER DATED 31/03/2020, PASSED BY RESPONDENT NO 3 WHEREBY NAME OF APPELLANT WAS STRUCKED OFF FROM POLICE FORCE BY THE RESPONDENT NO 3 AND THAT OF RESPONDENT NO 2 WHO HAS NOT ANSWERED THE DEPARTMENTAL APPEAL FILED BY THE APPELLANT ON 27/04/2020

PRAYER

ON ACCEPTANCE OF THE APPEL THE IMPUGNED ORDER DATED 31/03/2020 PASSED BY RESPONDENT NO 3 MAY GRACIOUSLY BE SET ASIDE AND APPELLANT, MAY BE REINSTATED IN SERVICE WITH ALL BENEFITS

ANY OTHER RELIEF, WHICH THIS HONORABLE TRIBUNAL MAY DEEM FIT, MAY ALSO BE GRANTED.

Respectfully Submitted

1. That, after fulfillment of requisite criteria, appellant was appointed as constable/special officer in Khyber Pakhtunkhwa Police Force on

Re-submitted to - 29/11/2014. Copy of Appointment Order is Annexure "A".
and filed.

Registrar
10/9/2020

2. That Appellant performed his duty with full devotion and dedication to the entire satisfaction of the immediate bosses.
3. That during service, Provincial Government regularized the services of *Special Police Officers* and as such the service of Appellant, was also regularized, with effect from, 01/03/2020, vide order dated 08/04/2020. *(Copy of Notification is Annexure "B")*
4. That Appellant along with another police official was involved in false case vide FIR No 193 dated 27/12/2018 of police station Khazana Peshawar and ultimately the name of appellant was strike out, from the Police Force, vide order dated 31/03/2020 of respondent No 3 *(Copy of FIR and Impugned Order are Annexure "C" & "D")*.
5. That appellate filed departmental appeal against the order dated 31/03/2020 passed by respondent No 3 to the respondent No 2 vide Diary No 1388 dated 27/04/2020 on sound and plausible reasons which has not been responded till date. *(Copy of Receipt/diary number is Annexure "E")*.
6. That being aggrieved and dissatisfied of the impugned order passed by the Respondents No 3 appellant is before this Hon'ble Tribunal *inter alia* on the following grounds:

GROUNDS

- A. That the so-called disciplinary proceedings are in violation of settled law on the subject as such the impugned order/notification of striking

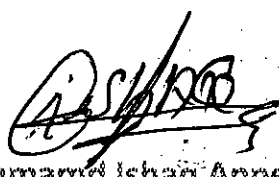
off the name of appellant from police force by the respondent No 3 is liable to be set-aside.

- B. That impugned order passed by the respondents No 3 is against the law facts and Service Record of appellant and not tenable.
- C. That appellant throughout his career performed his duties properly and with full dedication to entire satisfaction of his immediate bosses and left no room for any complaint.
- D. That impugned order is, arbitrary and based on malafide besides, discriminatory and as such, is not maintainable.
- E. That legal requirements and codal formalities required for imposition of major penalty were not fulfilled, while passing the impugned order/notification as such impugned notification is not tenable.
- F. That no show cause notice was issued to appellant before striking out his service.
- G. That appellant has been punished, for the fault of others that too without fulfillment of legal formalities.
- H. That appellant has been condemned unheard and as such fundamental rights of appellant guaranteed by the Constitution of Islamic Republic of Pakistan have been infringed beside the violation of principles of natural justice.

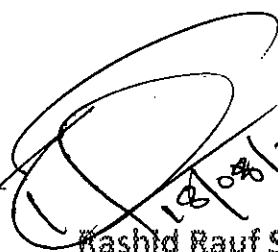
- I. That penalty imposed is harsh and disproportionate and against the settled principles therefore is not tenable.
- J. That no statement of allegations was given to the appellant in violation of law that is why the entire proceedings are illegal.
- K. That major penalty was imposed on Appellant without regular inquiry which is again violation of fundamental rights of *Fair Trail* guaranteed by the Constitution.
- L. That no opportunity of *Personal Hearing* was provided to the appellant during so called disciplinary proceedings and appellant was condemned unheard.
- M. That proper procedure was not adopted by the respondents No 3 while passing the impugned order and as such damaged the career of appellant without any justification.
- N. That any other ground will be agitated during arguments with the permission of the Court/Tribunal.

IT IS, THEREFORE HUMBLY PRAYED THAT, ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDERS MAY BE SET-ASIDE AND APPELLANT MAY BE INSTATED TO SERVICE WITH ALL BACK BENEFITS.

ANY OTHER RELIEF WHICH THIS HON'BLE TRIBUNAL DEEM FIT, MAY ALSO BE GRANTED.


Muhammad Ishaq Appellant

Through


Rashid Rauf Swati & Zele Huma Advocates

11
18/08/2020

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Muhammad Ishaq Son of Abdul Mateen, Ex Constable Khyber Pakhtunkhwa Police, Resident of Hazar Khawani Tehsil & District Peshawar.

(Appellant)

Versus

The Inspector General Police Khyber Pakhtunkhwa Peshawar and Others

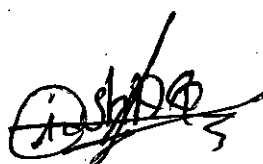
(Respondents)

AFFIDAVIT

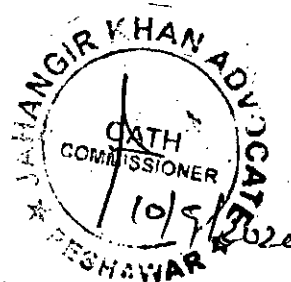
I, Muhammad Ishaq son of Abdul Mateen Resident of Hazar Khawani Tehsil & District Peshawar (Appellant) do hereby affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct and nothing has been concealed.

Identified By:

H
18/08/2020
Zeel Huma Advocate High Court


Deponent

CNIC 17301-5528419-7



Annex "A"

6

ENLISTMENT ORDER

In light of instruction of W/PPO, KPK, Peshawar vide Letter No. 1195-1211/E-IV, dated 03.04.2014, Mr. Muhammad Ishaq s/o Abdul Mateen r/o Hazar Khwani PS AMJ Shah Distt: Peshawar is hereby appointed in Special Police Officer on fixed pay of Rs.15000/-Per month, subject to the medical fitness and local verification. The post shall automatically stand abolished on expiry of the said contract. Her Services can be terminated any time without assigning any reason.

SP/HQrs:
For CAPITAL CITY POLICE OFFICER,
PESHAWAR.

OB NO. 3511

DATED. 18-11-2014.

NO. 5839 / OSI, dated Peshawar the 19/11 /2014.

Copy to the:-

1. Superintendent of Police, City, Peshawar.
2. DSP Subrub/SHO Subrub.
3. Pay Officer
4. CRC/FMC
5. Incharge Clothing Godown.

7

Annexure "B"

Attest @ [Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
PESHAWAR

NOTIFICATION

No. SOI-2019/110/15-29/2016 Vol-II: In pursuance of the provisions of Section 3 read with Section 5 of the Khyber Pakhtunkhwa Special Police Officers (Regularization of Services) Act, 2019 (Khyber Pakhtunkhwa Act No. XXVII of 2019) and on the recommendation of Provincial Police Officer, Khyber Pakhtunkhwa and approval of the Provincial Cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regularization of the following Special Police Officers (SPOs) working in CCP, Peshawar under DDO Code PR4393-Peshawar City Police as Constables (BPS-07) with effect from 01-03-2020.

S.NO	NAME	FATHER NAME	BELT NO
1.	SHAZIA BIBI	w/o SHAKEEL	1
2.	ARSHID	JEHANZAIB	2
3.	HUSSAIN KHAN	GHANI KHAN	3
4.	ALLAH DAD	SHAHBAZ KHAN	4
5.	IRSHAD KHAN	MUKHTIAR	5
6.	NADEEM AKBAR	FAZAL AKBAR	6
7.	MISKEEN KHAN	SANGEEN	7
8.	ARIF ULLAH	AKBAR DIN KHAN	8
9.	KHADIM SHAH	QASIM SHAH	9
10.	HAMDULLAH JAN	HASSAN ULLAH	10
11.	MUHAMMAD RAHIM	FAZAL RAHEEM	11
12.	WAQAR ALI SHAH	MIR AHMAD	12
13.	NADAR KHAN	ZEWAR KHAN	13
14.	SYED HASNAIN SHAH	SYED ZAHID	14
15.	MUHAMMAD SIYAM	ABDUR RASHEED	15
16.	SYED NASIR SHAH	SYED BADSHAH	16
17.	MALANG KHAN	SHER ALI	17
18.	ZAHIR Jan	QAREEM BAKHSH	18
19.	MUHAMMAD ARSHID	IQBAL	19
20.	USMAN KHA	MUMTAZ KHAN	20
21.	FASI ULLAH	MATI ULLAH	21
22.	GILMIST		22

8

1076	FAWAD AHMAD
1077	KHUSHED KHAUL
1078	ADNAN ALI
1079	AMIN DAD
1080	WAJID ULLAH
1081	MUTAHIR SHAH
1082	BABAR ALI
1083	SHER MEHMOOD
1084	MUHAMMAD USMAN
1085	MUHAMMAD ISHAQ
1086	ISMAL
1087	AFTAB
1088	MUHAMMAD SHAKOOR
1089	MUHAMMAD UMAR SHAH
1090	HIDAYAT ULLAH
1091	WAJID ALI
1092	IKRAM ULLAH
1093	ZARDAD KHAN
1094	SHARIF ULLAH
1095	BABAR ALI
1096	NADEEM KHAN
1097	MUHAMMAD RAFIQ
1098	NASEER REHMAN
1099	NAWAB GUL
1100	MUMRIZ KHAN
1101	HAMSHED ULLAH
1102	WAQAS AHMAD
1103	MUHAMMAD HANIF
1104	IRFAN ULLAH
1105	AHSAN TARIQ
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MUJAZAM SHAH	1070
MALIK SHAMSHAD	1071
MAQDALI KHAN	1072
FOLAD	1073
WALI KHAN	1074
MUHAMMAD SHAH	1075
MUKAMIL	1076
SOHBAT KHAN	1077
SHER AKBAR	1078
RAHEEM KHAN	1079
ABDUL MATEEN	1080
IBRAHIM KHAN	1081
ITMIAZ KHAN	1082
KHAN SHAD	1083
SHER AFZAL	1084
ABDUL GHAFUOR	1085
SHAMROZ KHAN	1086
FEROZ KHAN	1087
GUL AKBAR	1088
ZAFAR ALI	1100
FAZAL NABI	1101
RAHEEM KHAN	1102
REHMAN	1103
KHAN	1104
KHAN	1105
KHAN	1106
SHAMSHAD KHAN	1107
AMIR KHAN	1108
SHAMSAHAD KHAN	1109
MUHAMMAD TARIQ	1110
MUHAMMAD SADIQ	1111
WARIS KHAN	1112
TASLEEM KHAN	1113
ABDUL KARIM	1114
NIJAZ MUHAMMAD	1115
NIZAKAT ALI	1116
REHMAT SHAH	1118
SALAH UD DIN	1119
MUHAMMAD ULLAH	1120
FAZAL HAMID	1121
ATLAS KHAN	1122
IMDAD KHAN	1123
HASHIM KHAN	1124
TAI ALI	1125
GHULAM	1126
SARA MIR	1127
AURANGZEB	1128
BEHRAM ALI	1129
GHULAM SARWAR	1130
MEHZAAD GUL	1131
GULIKHTR	1132
ASHRAF KHAN	1133
GOHAR KHAN	1134

Attest d

7 A

BETTER COPY (Page No. 7)

**Government of Khyber Pukhtunkhwa
Home & Tribal Affairs Department
Dated Peshawar The April 8th, 2020**

NOTIFICATION

No. SO (Budget/HD/15-29/2016 Vol-II: In pursuance of the provisions continued in Section 3 read with Section 5 of the Khyber Pakhtunkhwa Special Police Officers (Regularization of Services) Act, 2019 (Khyber Pakhtunkhwa Act No. XXVII of 2019) and on the recommendation of Provincial Police Officer, Khyber Pakhtunkhwa and approval of the Provincial Cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regularization of the following Special Police Officers (SPOs) working in CCP, Peshawar under DDO Code PR4393-Peshawar City Police as Constables (BPS-07) with effect from 01-03-2020.

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1076	FAWAD AHMAD	MUAZAM SHAH	1080
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1099	NASEER REHMAN	FAZAL REHMAN	1103
1100	NAWAB GUL		1104
1101	MUMRIZ KHAN		1105
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1103	WAQAS AHMAD	SHER REHMAN	1107
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1112	ZAHID HAYAT	NIZAKAT ALI	1116
1113			1117
1114		REHMAT SHAH	1118
1115	ZIA UD DIN	SALAH UD DIN	1119
1116	KAMRAN	MUHAMMAD ULLAH	1120
1117	NAZAR HAMID	FAZAL HAMID	1121
1118	SAJID	ATLAS KHAN	1122
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1122	MUHAMMAD YOUNAS	GHULAM	1126
1123	JAMSHER ALI	SABA MIR	1127
1124	JEHANZEB	AURANGZEB	1128
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1127	DUNYA GUL	SHEHZAD GUL	1131
1128	MUJAHID KHAN	GUL IKHTIAR	1132
1129	ARSALA KHAN	ASHRAF KHAN	1133
1130	RAZWAN ULLAH	GOHAR KHAN	1134

تاریخ: 27/3/2020

Attested

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پر لیس ڈپورٹ شدہ وزیر اعلیٰ ایجوکیشن اور ہائیڈرو پاور

صفحہ لکھا جا رہا ہے	دفعہ 43
27/12 وقت نامعلوم	193
27/3 وقت جاگروں کے ساتھ 12	
2020	
119 - Police Act 2017	
خواہت جو کی جگہ پہلا نشانہ ڈاؤن کرنا	
فری مار 868 د اسحاق 1090 خانہ ڈاؤن کرنا	
بیمار ڈاک	

ابتدائی اطلاع نیچے درج کرو۔

تاریخ 31 دسمبر 20 کو سوشل میڈیا سے ذریعے ایک ریپورٹ سہارا سہارا جی ایم ایس آر ایف کے ذریعے
 خواہت میں پہلا نشانہ ڈاؤن کرنا کے لئے لفظ "سہارا" سے لے کر "سہارا" تک کے نشانہ ڈاؤن کرنا کے لئے
 ہاتھ سے لفظ "سہارا" کو ڈاؤن کرنا کے لئے "سہارا" کے لئے "سہارا" کے لئے "سہارا" کے لئے "سہارا" کے لئے
 شہر کے لاجیٹو کو روکنا اور ناگھان کے احاطہ میں روکنا اور سہارا کے لئے "سہارا" کے لئے "سہارا" کے لئے "سہارا" کے لئے
 آٹھ نومبر 2018 کو 942 حریف 12/18/2018 حریف 411-ISA 119-118-392
 خانہ ڈاؤن کرنا کے لئے گھر سے لے کر "سہارا" کے لئے "سہارا" کے لئے "سہارا" کے لئے "سہارا" کے لئے "سہارا" کے لئے
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تاریخ: 27/3/2020
 540/1022

9 A

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ فوجداری

تھانہ: داؤد زئی ضلع: پشاور
 علت نمبر: 193 تاریخ و وقت وقوعہ: 27/12/2018 وقت نامعلوم

12:30	تاریخ و وقت رپورٹ:	27/03/2020 وقت چاکیدگی پرچہ
	نام و سکونت اطلاع دہندہ مستغیث:	واجد شاہ اسپیکر SHO تھانہ داؤد زئی
	مختصر کیفیت جرم (معہ دفعہ) حال اگر کچھ لیا گیا ہو:	119-Police Act 2017
	جائے وقوعہ فاصلہ تھانہ سے اور سمت	حوالات چوکی چالہ بیلا تھانہ داؤد زئی
	نام و سکونت ملزم	
	کاروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو تو وجہ بیان کریں	
	تھانہ سے روانگی کی تاریخ و وقت	رسل ڈاک

ابتدائی اطلاع نیچے درج کرو:

مورخہ 20/03/2020 کو سوشل میڈیا کے ذریعے ایک ویڈیو وائرل ہوئی جس میں پولیس اہلکاران حوالات میں ملزمان پر تشدد کرتے ہوئے نظر آرہے ہیں۔ ہمیں اس سلسلے میں افسران بالا کے احکامات کے شیل بنظر معلومات کو اثری کرنے پر یہ بات سامنے آئی کہ ملزمان قیصر ولد شفیع سکنہ لاچیانو کورونہ ڈب ناگمان، 2۔ خان محمد ولد صابر گل سکنہ میوڑہ جو کہ مقدمہ علت 942 مورخہ: 22/12/2018 جرم 15A، 411، 149، 148، 392 PPC تھانہ داؤد زئی میں گرفتار ہو کر زیر حراست تھے۔ جن پر دوران حراست پولیس اہلکاران اسحاق 1090/SPO 2۔ فرہاد 868/SPO نے اختیارات کا ناجائز استعمال کرتے ہوئے تشدد کے مرتکب ہوئے۔ ہمیں ویڈیو کو USB میں محفوظ کر کے بروئے فرد قیصر پولیس کیا گیا اہلکاران مرتکب جرم بالا کے پائے جاتے ہیں۔ ہمیں جن کے خلاف مقدمہ درج رجسٹرڈ کر کے نقول پرچہ جات بعرض تفتیش خواہ لیاقت خان SI/Nr ٹاف کئے جاتے ہیں پرچہ گزارش ہے۔



Annexure "D"
10

OFFICE OF THE
SENIOR SUPERINTENDENT OF POLICE
(OPERATIONS)
PESHAWAR

Phone: 091-9210503,
Fax: 091-9213054

Attested

ORDER

On March 21, 2020 a video went viral on social media wherein two persons were seen being mistreated/tortured in the lock up of Police Post Jala Bela of Police Station Daudzai.

In order to ascertain actual facts and the identity of police officials, an enquiry was conducted through SP Rural Peshawar. At the conclusion of the said enquiry, Constable Ishaq Khan 1090/SPO & Constable Farhad Khan 858/SPO were found guilty for cruel, inhuman, and degrading treatment to the suspects arrested in case FIR No. 892 dated 22.12.2018 u/s 392/148/149 PS Daudzai.

Keeping in view the above explained position, the under-signed of the considered view that both the delinquent officials are guilty of gross misconduct. Since the delinquent officials belong to Special Police Force, therefore internal departmental proceedings are not required at this stage. Their names are hereby struck off from police force with immediate effect.

(ZAHOOR BABER AFRIDI) PSP
SENIOR SUPERINTENDENT OF POLICE,
OPERATIONS, PESHAWAR

No. 734-40/PA, dated Peshawar the 21 / 03 / 2020

Copy for information and necessary action to the:-

1. Capital City Police Officer, Peshawar.
2. SP HQ CCP Peshawar.
3. SP Rural CCP Peshawar.
4. AD-IT
5. OSI
6. FMC/CRC

10A

BETTER COPY (Page No. 10)

**OFFICE OF THE
SENIOR SUPERINTENDENT OF POLICE
(OPERATIONS)
PESHAWAR
Phone: 09-9210508
Fax: 09-9213054**

ORDER

On March 21, 2020 a video went viral on social media wherein two persons were seen being mistreated / tortured in the lock up of Police Post, Jala Bela (Police Station) Daudzai.

In order to ascertain actual facts and the identity of police officials an enquiry was conducted through SP Rural Peshawar. At the conclusion of the said enquiry, constable Ishaq Khan 1090/SPO & constable Farhad Khan 868/SPO were found guilty for cruel, inhuman and degrading treatment to the suspect arrested in case FIR No. 892 dated: 22-12-2018 u/s 392/148/149 PS Daudzai.

Keeping in view the above explained position, the under-signed of the considered view that both the delinquent officials are guilty of gross misconduct. Since the delinquent proceedings are not required at this stage. Their names are hereby struck off from police force with immediate effect.

**(ZAHOOR BABER AFRIDI) PSP
SENIOR SUPERINTENDENT OF POLICE
OPERATIONS, PESHAWAR**

No. 734-40/PA, dated Peshawar the 26/03/2020

Copy for information and necessary action to the:

1. Capital City Police Officer, Peshawar
2. SP HQ CCP Peshawar.
3. SP Rural CCP Peshawar
4. AD-IT
5. OSI
6. FMC / CRC

11

Annexure ⁴ B 11

Police Access Service (PAS) cpo Peshawar



Diary No. 1338 PAS.

Dated. 27/04 / 2020.

Sent to Cepo Peshawar

Phone No. - 091-9223576

~~Attended~~

50	54566	  
Zele Huma (Carhid Kamp Swati) ایڈوکیٹ بار کونسل ایسوسی ایشن نمبر: BC-10-3817 رابطہ نمبر: 0335-9210881		
پشاور بار ایسوسی ایشن، خیبر پختونخواہ بعدالت جناب: خیبر پختونخواہ سرسوالی ایڈووکیٹس ایسوسی ایشن		

دعویٰ: سرسوالی ایڈووکیٹ	منجانب: ایڈووکیٹ
علت نمبر:	محمد السمان
مورخہ:	بنام
جرم:	آئی۔ سی۔ خیبر پختونخواہ رخصت
تھانہ:	
باعت تحریر آنگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطہ پیروی و جواب دہی کارروائی متعلقہ
 آن مقام لٹنر کیلئے اظہارِ رجائے عدالت سوائی کو پیش مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر دائرہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دور ہوتا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رجب
 المرقوم: 17/08/2020

JESHAWAR BAR ASSOCIATION
KHYBER PAKHTUNKHWA

العبد العبد

مقام کے لیے منظور ہے۔

السمان خان ولد عبد الستار
 CNIC - 17301-5598419-7
 (Appellant)

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔



6
OFFICE OF THE
SENIOR SUPERINTENDENT OF POLICE
(OPERATIONS)
PESHAWAR

Phone. 091-9210508 Fax. 091-9212597

ORDER

In pursuance of the directions contained in letter No. 1348/PA dated 17.11.2020, Ex-Constable Ishaq Khan No. 1090 is hereby re-instated in service for the purpose of de-novo proceedings.

SENIOR SUPERINTENDENT OF POLICE,
OPERATIONS, PESHAWAR

No. 2774-78/PA dated Peshawar the

04 / 12 / 2020.

Copy for information and necessary action to:

1. The Capital City Police Officer Peshawar w.r. above cited memo please.
2. DSP Legal CCP Peshawar
3. OSI/CRC/PO
4. FMC