

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:
Service Appeal No. 945/2022

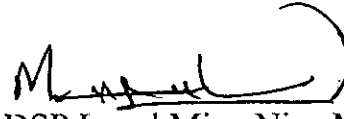
Shahzad Shah, Constable No. 2398Appellant

Versus

Provincial Police Officer KPK and others..... Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Written Reply	*	1- 4
2.	Affidavit	*	5
3.	Copy of Authority letter	*	6
4.	Copy of FIR	A	7
5.	Copy of charge	B	8
6.	Copy of summary of allegations	C	9
7.	Copy of enquiry report	D	10-11
8.	Copy of dismissal order	E	12
9.	Copy of reinstatement order	F	13
10.	Copy of final show cause notice	G	14
11.	Copy of cross examination and reply	H	15- 18


DSP Legal Mian Niaz Muhammad,
Elite Force, Peshawar

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IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL , PESHAWAR

In Re:

Service Appeal No. 945/2022

Shahzad Shah, Constable No. 2398

.....Appellant

Versus

Provincial Police Officer KPK and others

..... Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.01,02 & 03.

ON FACTS

S #	Para of the Facts	Reply of the Facts with Annexure
1.	The appellant while posted as Constable in Elite Force Commandant, Elite Force, KPK Peshawar vide order dated:20.02.2018 without conducted any proper departmental inquiry and providing a chance of personal hearing.	Incorrect, appellant was involved in Case FIR No. 133, dated 27/01/2018, Under Section 377/511/506 PPC Police Station Haripur. Moreover he also remained absent from duty without any leave or prior permission from high ups i.e. (46 days absentia) in this regard charge sheet and summary of allegations were issued to him by Deputy Commandant Elite Force and Acting SP Elite Force HQrs was appointed as an enquiry officer, in enquiry appellant was found guilty as the charges leveled proved against him is a moral turpitude however, his criminal act with a school child and involvement in such activities brought bad names to Elite Force as well as to whole Police Department, enquiry officer found him guilty in the matter and recommended him (appellant) for major punishment i.e. dismissal from service, hence dismissed from service. Copy of charge sheet is attached as Annexure 'A' , Statement of allegation replies is attached as Annexure 'B' , Final report and Final Show Cause with dismissal order are attached as Annexure 'C' & 'D' .
2.	That after Trial the appellant as acquitted of the charge by the Trial Court of Judicial Magistrate Haripur vide decision dated:16.12.2020. no appeal was filed against the said order which has attained finality.	Pertain to record, however, being a member of discipline force, involvement in a criminal case is a gross misconduct and also the act of appellant is against morality, hence liable to be dismissed.

3.	That on acquittal the appellant filed a departmental appeal dated:04.01.2021 against his dismissal order before the appellate authority/commandant Elite Force KPK Peshawar which was rejected vide order dated:25.02.2021. Copy of departmental appeal could not be retained.	Correct, due to involvement in criminal case as well as absented from duty, the appellant departmental appeal was rejected.
4.	That aggrieved of the order of Commandant Elite Force KPK, Peshawar the appellant filed a Revision petition before the Provincial Officer KPK, Peshawar on 04.03.2021 which was partially accepted vide order dated:15.04.2022 and appellant was reinstated in service and penalty of dismissal was converted into stoppage of two years increment.	Incorrect, however, major punishment of dismissal from service has been converted into reinstatement in service and his period of absence has been treated as leave without pay. Therefore, there has no right to file the instant case/appeal in the court of law
5.	Hence instant service appeal, inter alia, on the following amongst others	That the instant appeal may kindly be dismissed on the following grounds:

GROUND:-

S. #	Para of the Grounds	Reply of the Grounds with Annexure
a.	That impugned orders dated:20.02.2018, 25.02.2021 and dated:15.04.2021 of the respondents are illegal, unlawful void ab initio against the facts, departmental rules and regulations and principles of natural justice hence liable to be set aside/modified.	Incorrect, as already explained in the preceding paras, respondents are doing every act in the ambit of law, no injustice or illegality has been done with the appellant.
b.	That no proper departmental inquiry was conducted. No witness was called for to appear before the inquiry officer in presence of appellant to record evidence nor was appellant provided with a chance to cross examine such a witness. Copy of the inquiry report, if any was never provided to appellant. No show cause notice was given to him even opportunity of personal hearing was not afforded to the appellant rather he was condemned unheard.	Incorrect, as already explained in the preceding paras, moreover, final show cause notice was also issued to the appellant, he (appellant) also submitted reply but reply was found unsatisfactory, he was also called in orderly room on 20/02/2018 to appear before the competent authority to explain his position and was heard in person but he failed to prove the allegations leveled against him
c.	That respondents have not treated the appellant in accordance with law, departmental rules and regulations and policy on the subject and have acted in violation of Article-04 of Constitution of Islamic	Incorrect, appellant has already been treated in accordance with law, rules and regulations.


	Republic of Pakistan 1973 and unlawfully issued the impugned orders which are illegal, unlawful void ab initio unjust, unfair and taken by the appellant in the memo appeal and has filed the appeal, thus act of respondents is contrary to the law, and laid down in the KPK Police Rules 1934 read the section 24-A of General Clause Act, 1897 and Article 10-A of the Constitution of Islamic Republic of Pakistan 1973.	
e	That appellant has discharge his assigned duties with devotion, dedication and honesty always fighting against the forces of criminals. He pointed out and got arrested the Narcotics Paddles, gamblers and other species of different time criminals. He left no stone unturned in discharge of officials duties and responsibilities.	Incorrect, pertain to record, however, appellant himself involved in a criminal case and a habitual absentee during service.
f	That the allegations leveled against the appellant in the charge sheet are of ambiguous nature, without any reason, reference, justification and based on surmises, speculation and conjectures which remained un-proved and un-substantiated to even this day. Appellant was innocent and FIR on based on enmity and personal grudges, he was acquitted by the Trial Court. Nothing could be brought on record against appellant like he was involved in criminal case etc for which he has been awarded with punishment.	Incorrect, as already explained in the preceding paras.
g	That since his dismissal from service to re-instatement in service, the appellant remained jobless and had no source of income to live on, and therefore, he along with his family had to suffer financial distresses.	As replied above
i	That instant appeal is well within time and this Hon'ble Service Tribunal has got every jurisdiction to entertain and adjudication upon the same.	Respondent may be allowed to raise other grounds at the time of arguments.


(57)


- I. Respondent may be allowed to raise other grounds at the time of arguments.

PRAYER:

Keeping in view of the above stated facts, it is humbly prayed that the service appeal is based on fallacious grounds may kindly be dismissed with cost please.


Inspector General of Police
Khyber Pakhtunkhwa Peshawar
(Respondent No. 1)


Deputy Commandant
Elite Force
Khyber Pakhtunkhwa Peshawar
(Respondent No. 3)


Addl: IGP Commandant,
Elite Force
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2)

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IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:
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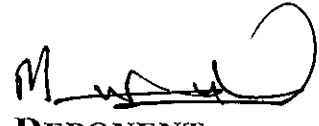
Shahzad Shah, Constable No. 2398Appellant

Versus

Provincial Police Officer KPK and others..... Respondents

AFFIDAVIT

I Mian Niaz Muhammad (ADSP Legal) Elite Force, Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm that the contents of this Para Wise Comments on behalf of respondent No. 2 & 3 are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



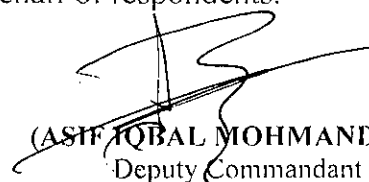
DEPONENT
CNIC: 17301-1519386-1
Cell # 0300-5899631

Identified by:

②

AUTHORITY LETTER.

The undersigned is hereby authorized to nominate Mr. Mian Niaz Muhammad Acting DSP/Legal Elite Force to submit the replies and attend the Honorable High Court/Supreme Court on behalf of respondents.


(ASIF IQBAL MOHMAND) PSP
Deputy Commandant
Elite Force Khyber Pakhtunkhwa Peshawar

DEPUTY COMMANDANT,
Elite Force Khyber Pakhtunkhwa
Peshawar

03009758723

ابتدائی اطلاعی رپورٹ

033
011-011
27-1-18

ابتدائی اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 152 مجموعہ ضابطہ فوجداری

27 1/8	27 1/8	27 1/8
21:00	21:00	21:00
27 1/8	27 1/8	27 1/8
27 1/8	27 1/8	27 1/8
27 1/8	27 1/8	27 1/8
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مگر بری درخواست جو سالت ضابطہ ابتدائی اطلاع نیچے درج کرو۔ کوئی مہر نہ دیکھتے تھے۔ تاریخ 27 1/8 21:00

نام و سکونت اطلاع دہندہ مستغنیٹ طارق خان ولد محمد طارق سکندر سکر 1 KTS

مختصر کیفیت جرم (معدہ دفعہ) حال اگر کچھ لیا گیا ہو۔

جائے وقوعہ فاصلہ تھانہ سے اور سمت

نام و سکونت ملزم

کاروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو

تھانہ سے روانگی کی تاریخ و وقت

مگر بری درخواست جو سالت ضابطہ ابتدائی اطلاع نیچے درج کرو۔ کوئی مہر نہ دیکھتے تھے۔ تاریخ 27 1/8 21:00

نام و سکونت اطلاع دہندہ مستغنیٹ طارق خان ولد محمد طارق سکندر سکر 1 KTS

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تھانہ سے روانگی کی تاریخ و وقت

ASHTA P.S. 27-1-18


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CHARGE SHEET

I, Muhammad Hussain, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you Constable Shehzad Shah No. 2398 Elite HQrs: Peshawar as follows;

As per report of Moharrar Elite HQrs: Peshawar vide Daily Diary No. 18, dated 19.01.2018, you remained absent from duty without any leave or prior permission w.e.from 19.01.2018 till to-date. You were also allegedly involved in a case vide FIR No. 133, dated 27.01.2018 U/S 377/511/506 PPC Police Station City District Haripur.

2. By reason of the above, you appear to be guilty of misconduct under the Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in the said rules.
3. You are therefore, directed to submit your defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
4. Your written defense, if any, should reach the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. You are directed to intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.


(MUHAMMAD HUSSAIN) PSP
Deputy Commandant
Elite Force Khyber Pakhtunkhwa Peshawar.

SUMMARY OF ALLEGATIONS

I, Muhammad Hussain, Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar as competent authority, am of the opinion that Constable Shehzad Shah No. 2398 Elite HQrs: Peshawar has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Police Rules, 1975.

SUMMARY OF ALLEGATIONS

As per report of Moharrar Elite HQrs: Peshawar vide Daily Diary No. 18, dated 19.01.2018, he remained absent from duty without any leave or prior permission w.e. from 19.01.2018 till to-date. He was also allegedly involved in a case vide FIR No. 133, dated 27.01.2018 U/S 377/511/506 PPC Police Station City District Haripur.

2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, **Mr. Waqar Ahmed Acting SP/HQrs: Elite Force Peshawar, is appointed as Enquiry Officer.**
3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within (25 days) after the receipt of this order.
4. The accused shall join the proceedings on the date, time, and place fixed by the Enquiry Officer.

(MUHAMMAD HUSSAIN) PSP
Deputy Commandant

Elite Force Khyber Pakhtunkhwa Peshawar.

No. 1432-37/EF, dated Peshawar the 29/01/2018.

Copy of the above is forwarded to the:-

- ✓ 1. Acting Superintendent of Police, HQrs: Elite Force Peshawar.
2. RI/Elite Force Khyber Pakhtunkhwa Peshawar.
3. EC/SRC/FMC, Elite Force Khyber Pakhtunkhwa Peshawar.
4. Shehzad Shah No. 2398 Elite HQrs: Peshawar through reader Acting SP/HQrs: Elite Force Peshawar.

میں نے اپنا چارج شیٹ جمع کروائی اور ایکشن درست طور پر وصول کیا

الہ

مورخہ 30-1-18

موبائل نمبر 0335-8094023
0313-5949606



OFFICE OF THE SUPERINTENDENT OF POLICE,
HEADQUARTERS, ELITE FORCE, PESHAWAR.



DEPARTMENTAL ENQUIRY

It is submitted that Constable Shezad Shah No.2398 of this unit, While posted at Elite Force, HQrs Peshawar, absented himself from 08.01.2018 to 12.01.2018, 13.01.2018 to 17.01.2018, 28.12.2017 to 02.01.2018. (Total 13 days) and still absent from 19.01.2018. He is also involved in case FIR No.133 dated: 27.01.2018 u/s 377, 511, 506 PPC, Police Station City, District Haripur,

For the purpose of scrutinizing conduct of the said defaulter the Deputy Commandant Elite Force, Khyber Pakhtunkhwa vide order No.1432-37/EF, dated:29.01.2018, issued charge sheet with summary of allegations to the defaulter constable, and Superintendent of Police, Headquarter, Elite Force, Peshawar was appointed as enquiry officer.

The Charge Sheet and Summary of Allegations were served upon defaulter constable on 30.01.2018 during his arrest/custody in case FIR No.133 dated: 27.01.2018 u/s 377, 511, 506 PPC, Police Station City, District Haripur, in the presence of Investigation officer of the case. In response to charge sheet and summary of allegations defaulter constable submitted his written statement stating that his father was sick, therefore, he absented himself, while involvement in criminal case is baseless.

The defaulter constable was crossed examined with 12 questions, but answers to the questions were not satisfactory. The Co-accused in criminal case, namely, Ishfaq, Ahmed, Shams, Khurram and Arsalan, are known to him as they are neighbors to each other. The defaulter constable admitted that a room at Deenda Road near Darvaish Haripur City is hired on rent for Rs.4000/- per month since 3/4 years. However, he refused any sexual/harassment to victim Shamil S/O Wakil age 14/15 years resident of Haripur.

According to investigation officer, 04 numbers of cell-phones from the possession of all accused have been recovered, which will be sent to Forensic examination to dig out the alleged video of the victim, Moreover, medical test of the victim have been done and samples from accused for DNA test also been taken.

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All the five accused are in Police custody for 02 days physical emand.

The complainant of the case Mr. Tariq Khan S/O Muhammad Sadiq and victim Shamil S/O Wakil were also heard. The victim stated that he is a student of class 8th. Two months back accused Ishfaq came to his house in Toyota GLI motor car as he was his neighbor asking him that a piece of work at Snooker Club in city area, needs to be addressed, therefore, he accompanied him, who brought him to a room, where four other persons were already present. All of them sexually abused him and accused Ishfaq was making video from his cell-phone. He can identify all the accused as they were threatening for blackmailing him for the said video.

The complainant Tariq Khan stated that this group is known as gang for same purpose abusing children of the area. He is hopeful that he will be granted justice and this menace will be crushed out.

On the perusal of service record, submitted by SRC/FMC Elite Force Peshawar of defaulter constable Shezad Shah No.2398 showing that during his service different punishments were granted, i-e warning, fine of Rs.200, stoppage of 3 increments and major punishment "dismissal from service" (copies of punishment orders enclosed).

The criminal act of the defaulter constable with a school child is affecting the discipline and image of Police department and he is a habitual absentee and unfit and not taking interest in job. Keeping in view it is recommended that due to his bad act and previous punishments and habitual absenteeism and available statements/proofs on the investigation file, major punishment i-e "dismissal from service" may be awarded to the defaulter constable.

Submitted please.



(WAQAR AHMED)
Superintendant of Police,
Headquarter, Elite Force,
Peshawar.

D= 28/R/SP-HQ/EF

E= 02-02-2018

No. 1095
6-2-2018
Peshawar



Office of the Deputy Commandant
Elite Force Khyber Pakhtunkhwa Peshawar



No. 2670-77/EF

Dated 20/02/2018.

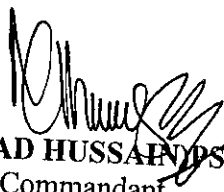
ORDER

This order will dispose the departmental proceedings against Constable Shehzad Shah No. 2398 of Elite Force, on deputation from Haripur.

He was involved in case FIR No. 133, dated 27.01.2018 U/S 377/511/506 PPC Police Station City District Haripur also remained absent from duty without any leave or prior permission w.e. from 28.12.2017 to 02.01.2018, 08.01.2018 to 12.01.2018, 13.01.2018 to 17.01.2018 and 19.01.2018 to 20.02.2018 (total 46 days). Charge Sheet & Summary of Allegations were issued to him by this office vide No. 1432-37/EF, dated 29.01.2018 and Acting SP Elite Force HQrs was appointed as enquiry officer. Enquiry Officer in his findings found him guilty as the charges leveled proved against him and his criminal act with a school child and involvement in such activities brought bad names to Elite Force as well as to whole police department. His previous record was also perused, the defaulter during his whole service was awarded different punishments i.e. Warning, fine of Rs. 200, Stoppage of 03 annual increments and dismissal from service, which shows he is a habitual absentee and did not take interest in his official duty. Enquiry officer in his findings found him guilty in the matter and recommended him for major Punishment i.e. dismissal from service. A Final Show Cause Notice was issued to him but his reply was found unsatisfactory. He was also called in orderly room on 20.02.2018, to appear before the undersigned to explain his position, and was heard in a person but he failed to satisfy the undersigned.

Therefore, I, Muhammad Hussain, Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, keeping in view of above facts and recommendations of enquiry officer impose major penalty of dismissal from service upon him.

Moreover, period he remained absent from duty i.e. 46 days is treated as leave without pay.


(MUHAMMAD HUSSAIN) DSP
Deputy Commandant
Elite Force Khyber Pakhtunkhwa
Peshawar.

Copy of the above is forwarded to the:-

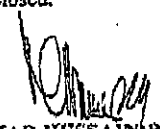
1. District Police Officer, Haripur for information.
2. Superintendent of Police, Elite Force Headquarters.
3. RI, Elite Force Khyber Pakhtunkhwa Peshawar.
4. Incharge Kot, Elite Force Khyber Pakhtunkhwa Peshawar.
5. Accountant, Elite Force Khyber Pakhtunkhwa Peshawar.
6. OHC, Elite Force Khyber Pakhtunkhwa Peshawar.
7. SRC, Elite Force Khyber Pakhtunkhwa Peshawar.
8. FMC, Elite Force along with complete enquiry file i.e 42 pages.

FINAL SHOW CAUSE NOTICE

I, Muhammad Hussain, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority under Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014), do hereby serve you Constable Shehzad Shah No. 2398, (Elite HQrs) of Elite Force as follows;

You were allegedly involved in case FIR No. 133, dated 27.01.2018 U/S 377/511/506 PPC Police Station City District Haripur, and also remained absent from duty without any leave or prior permission w.e from 28.12.2017 to 02.01.2018, 08.01.2018 to 12.01.2018, 13.01.2018 to 17.01.2018 and 19.01.2018 till this date..

- i. That consequent upon the completion of enquiry conducted against you by A/SP Elite Force HQrs, you were given full opportunity of hearing but failed to satisfy the Enquiry Officer.
- ii. On going through the finding and recommendation of the enquiry officer, the material available on record, I am satisfied that you have committed the omission/commission specified in Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) and charges leveled against you have been established beyond any doubt.
- 2. As a result therefore I, Muhammad Hussain, Deputy Commandant Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority have tentatively decided to impose major penalty upon you including removal from service, under Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) of the said ordinance.
- 3. You are therefore, directed to show cause as to why the aforesaid penalty should not be imposed upon you.
- 4. If no reply to this show cause notice is received within seven days of its delivery, in the normal course of circumstances, it shall be presumed that you have no defense to put and in that case an ex-parte action shall be taken against you.
- 5. A copy of the finding of the Enquiry Officer is enclosed.


(MUHAMMAD HUSSAIN)PSP
Deputy Commandant
Elite Force Khyber Pakhtunkhwa
Peshawar.

No. 2071 /EF, dated Peshawar the 06/02/2018.
FC Shehzad Shah No. 2398, at his home address through reader A/SP/Elite HQrs.

فائل شوکانہ نوٹس جیل حکام سے واپس لے کر دیا گیا

۲-۱-۲۰۱۸
حال والی سیکشن میں رہنے والے محترم ارشد شاہ راہی صاحب

جانبی کام
حسب ضابطہ عمل فائل شوکانہ نوٹس اڈان
جیل شہنار شاہ مذ 2398 طال واپسی سرکل جیل
پہلے پور پور والی ارسال خدمت ہے۔

۱۸/۰۲/۲۰۱۸
DSP Elite NR
08/02/2018

30/1/18

تاریخ

(5)

03009758723

میں اس وقت کوئی شکوکہ نہیں رہتا ہے۔ لکھنؤ میں
کے ساتھ ہی -

اس وقت کے حالات اور امور کا یہ سبب ہے کہ
شہر کے لوگ اس سے متعلق ہیں۔
کھانسی اور سہاگہ

دیکھو اس وقت کے حالات

اس لئے کہ اس وقت کے حالات


کھانسی اور سہاگہ

The vision school system

(8)

سوال 1: آپ کب سے ایلیٹ فونز کو فون کر رہے ہیں اور موجودہ فون کیا ہے؟

ج 1: عرصہ تین ماہ سے ایلیٹ میں ہوں۔ BASIC ٹییارہ کو ایلیٹ میں ہوں۔ ایلیٹ ہیڈ کو آرڈر لپٹا اور میں دھواہ سے بچتا ہوں

الو 

سوال 2: آپ رہنے والے فون کیا ہے کب سے غیر حاضر ہے اور مع غیر فون کیا ہے؟

ج 2: 19⁰¹/₂₀₁₈ سے غیر حاضر ہوں۔ والد بیمار ہے۔


الو 

سوال 3: کیا آپ کے پاس برائے فوننگ ڈیٹا ہے اور فوننگ ڈیٹا کے ساتھ ساتھ آپ رہتے ہیں؟

ج 3: جی ہاں۔ کراچی میں ایک کمرہ ڈیفنڈہ روڈ نزد داروین سٹریٹ 4555 ہاؤس
مانسوار پر حاصل کیا ہے۔ تقریباً 3 یا 3 سال سے کمرہ میں رہتا ہے۔
روشن پلازہ کے بائیں طرف ہے۔ ایڈریس کا فوننگ ڈیٹا ہے۔ جی ہاں ہاؤس میں

سوال 4: کیا میں شامل فون کے ساتھ آپ پر فوننگ کر سکتی ہوں؟ اور اگر نہیں تو فوننگ ڈیٹا
اور گھومنے والے فوننگ ڈیٹا کیا ہے؟

ج 4: میں نے کوئی وڈیو نہیں بنائی اور نہ ہی کوئی بد نظمی کی

الو 

سوال 5 کیا آپ نے مذکورہ شامل خان کے ساتھ بدھیل کو ویدو لدر لیا
نہاے ہوئے دیگر ملازمین کو قدم کو جسے اس فعل سے شامل کیا

72۔ جو اس بارک میں کچھ پتہ نہیں ہے

الع

سوال 6 آپ صہی شامل خان کو کتب سے اور کبھی جاننے سے اور آپ کے اسکے ساتھ
کتنے زمرہ سے تعلقات ہیں ؟

72۔ شاعری (مقصود) میں لکھو سی ہے۔ اتنا جاننا ہوں کہ یہ تین بھائی
ایک شوال، فیضان اور شامل ہیں۔ شامل سے ایک کوئی
دوستی نہیں رہی ہے۔

الع

سوال 7 کیا آپ نے شامل خان کو زبان کے دو قسم سے متعلق بیک میں کچھ
کے آپ کے ویدو اور لکھو عام لوگوں کو دیکھا ہے؟ ان کو اور
نے کسی کو دو قسم کے متعلق سید با عرف ولادت سے دیا دیکھا ہے؟
72۔ میں نے کوئی دھکی ٹون وغیرہ نہیں کیا ہے۔

الع

سوال 8 آپ کے ساتھ شامل دیگر ملازمین دربارت الہد شمس، اشتقاق الہد، قدم اور
کے ساتھ کیا کیا تعلق ہے لہذا کتب سے ہے ؟
72۔ اشتقاق میں ساتویں آٹھویں نوین تک کلاس فیو اچھے۔ الہد شمس، قدم
اور اربان کو بھی جانتا ہوں۔ یہی دوستی ان کے ساتھ ہے۔

الع

سوال 9۔ 1۔ خان کے ساتھ وقتوں کے درمیان کس سے ملوہ کس سے ملوہ
 کشادہ مہ قبل واقع وقوع سزادہ
 2۔ 2۔ جی نہیں معلوم ہے۔ اور جی نہیں ہے کا جواب ہے
 الی

سوال 10۔ 1۔ آپ کے ساتھ وقوع میں نہیں کرتے وقت اور وقتے ساتھ ملزمان نہ ہیں
 2۔ 2۔ فضل کیا؟
 3۔ 3۔ یہ سمیت ذیل کا نامزد ساتھیوں پر الزام ہے۔ جن میں
 اتفاق، احمد شمس، خرم، ارسلان شامل ہیں
 الی

سوال 11۔ 1۔ کیا آپ پر پہلے بھی ہرنسلی 377 تپ کا مقدمہ درج رہا ہے
 2۔ 2۔ جی نہیں ہے کہ کہیں بھی کوئی مقدمہ درج نہیں ہوا ہے
 الی

سوال 12۔ 1۔ آپ کا نوٹائل اور ساتھیوں کا نوٹائل کہاں پر ہے؟

2۔ 2۔ یہ پاس تو کیا (سادہ) نوٹائل ہے اور اس وقت
 15 دن قبل گم ہو گیا ہے۔ جب یہ دو عدد ہم جن کے پاس تھے
 باقی

0335-8094023
 0313-5949606

باقی ساتھیوں کے نوٹائل و ترقیاتی اس کے پاس ہیں
 الی