02.11.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments.

Adjourned. To come up for arguments before the D.B on

30.12.2022.

(Mian Muhammad) Member (E) (Salah-ud-Din) Member (J)

30112.22

adjourned to 20.3.23, for the Game.

20.03.2023

Junior to counsel for appellant present.

Fazal Shah Mohmand, learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 05.06.2023 before D.B. Parcha Peshi giveh to the parties.

(Muhammad Akbar Khan) Member (E)

(Rozina Rehman) Member (J) 25.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.

25th May, 2022

Counsel for the appellant present. Mr. Muhammad Rashid, Deputy District Attorney alongwith Mazhar Abbas, Stenographer for the respondents present.

Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 10.08.2022 before D.B.

> (Fareeha Paul) Member(E)

(Kalim Arshad Khan)

10-8-2022 Proper DB not averilable the case is adjourned to 2-11-2022

14.06.2021

Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

stipulated period has passed and reply has not been swented.

The respondents have not submitted written reply. Learned AAG is directed to contact the respondents. They are required to submit written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 26.10.2021 before the D.B.

P.S

29.06.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.

Chalinnan

26.10.2021

Learned counsel for the appellant present. Mr. Ibrahim Khan, Inspector (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents submitted, which is placed on file and copy of the same handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any as well as arguments on 25.02.2022 before the

D.B.

(MIAN MUHAMMAD) MEMBER (E) (SALAH-UD-DIN) MEMBER (J)

). D.

Form- A

FORM OF ORDER SHEET

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Court of			4.5	············			
	٠.٠	: "		, i			
	Q 9				·		
e No -	D DAO			/2021	7/1		

	Case No	/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/01/2021	The appeal of Mr. Atiq-ur-Rehman presented today by Mr. Nasir Mehmood Advocate may be entered in the Institution Register and put up
-		to the Worthy Chairman for proper order please.
2	·	REGISTRAR This case is entrusted to S. Bench for preliminary hearing to be put
_		up there on. 12/63/21
		CHAÎRMAN
	* 1	
	12.03.2021	Appellant present through counsel. Preliminary arguments heard. File perused.
		Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days.
ppellant ecertif	Deposited Process Fee	Thereafter, notices be issued to respondents for written geply/comments. To come up for written reply/comments on
_D/	Mm	14 / 66 /2021 before S.B.
		(Rozina Rehman) Member (J)
÷		

APPEAL NO. /2020

Attiq ur Rehman	APPELLANT
VERSUS	
Inspector General of Police, Khybe	r Pakhtunkhwa and others
	RESPONDENTS

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APPELLANT

THROUGH

Advocate Supreme Court of Pakistan
Add: Office 622, 6th Floor, Pak Medical

Center, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. 820 /2026

Attiq ur Rehman Ex-Constable No. 739 District Hangu R/o Village Shanki Banda, Takht Nasrati District Karak

.....APPELLANT

VERSUS

- 1- Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- Regional Police Officer Kohat Region, Kohat.
- 3- District Police Officer, Hangu.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE IMPUGNED ORDER DATED 09.12.2020 WHEREBYM
APPEAL OF THE APPELLANT REJECTED WHICH WAS
FILED AGAINST THE ORDER DATED 30.09.2020 PASSED
BY RESPONDENT NO.3 WHEREBY APPELLANT WAS
DISMISSED FROM SERVICE.

PRAYER:

That on acceptance of this appeal the impugned order dated 09.12.2020 and 30.09.2020 passed by respondent No.2 and 3 may kindly be set aside and the appellant



may kindly be reinstated in service with all back benefits.

R/SHEWETH:

ON FACTS:

- 1- That the appellant joint police service as a constable in District Hangu in the year 2009 and since then was performing his duties to the entire satisfaction of superior. Before his involvement in the present FIR on the basis of which he was dismissed from his service he is having un-blemished record with no single adverse entry in his service record.
- 2- That the appellant permanently belong to District Karak and is having poor family background. Due to his poor family background his opponent has involved his family in criminal integration in order to grab his family property. In this process several of his family members have lost their lives.
- 3- That the appellant usually visit his own home town in District Karak from District Hangu and due to his enmity he use to hire motor car for ensuring his safe journey.
- 4- That on 24.07.2020 the appellant hired a motor car to visit his home town in Takht Nasrati District Karak and on reaching the limits of Police Station, Ostarzai, Distinct Kohat, a passenger gave him a signal for stopping the motor car and the appellant stopped the motor car.
- 5- That the person requested the appellant for lift and the appellant gave him the lift and in the course of journey the said person



disclosed to him that he was to District Karak, therefore, the appellant did not drop him in District Kohat.

- 6- That when the appellant reached the old toll plaza District Karak,
 Police stopped the motor car for checking and allegedly
 recovered CHARS from the bag of the said person.
- 7- That the Police malafidely involved the appellant in the alleged recovery of CHARS from the co-passenger of the appellant and to this effect FIR No. 490 dated 24.07.2020 u/s 9D CNSA Police Station City Karak was lodged. (Copy of FIR is attached as annexure "A").
- **8-**That the respondent No.3 thereafter dismissed the appellant vide the order dated 30.09.2020 (**Annexure "B"**) against which appellant filed departmental appeal which was also rejected vide order dated 09.12.2020 (**Annexure "C"**).
- 9- That appellant feeling aggrieved and having no other remedy is filling the instant service appeal on the following grounds amongst the others.

GROUNDS:

A-That the impugned orders dated 30.09.2020 and 09.12.2020 passed by respondent No.2 and 3 are void ab-initio as no charge of commission of misconduct was leveled against appellant. As regards the criminal charge, it is well settled principle of law that accused is innocent until and unless the charge is proved and accused is convicted. The criminal charge is still pending trial and the lower authority passed the impugned orders.

- B-That there is every probability of acquittal of appellant in the criminal case as the alleged recovery was made from the direct possession of the Co-passenger of the appellant. Again appellant was native of district Karak and was on way home and the alleged recovery was effected from the bag of co-passenger of the appellant while going to Karak.
- C-That the appellant was condemn unheard because during the course of inquiry proceedings no charge sheet, statement of allegation was given to the appellant. His statement was not recorded and also the statement of witnesses were not recorded in his presence. He was not heard in person neither by the respondent No.2 nor by respondent No.3. No chance of the cross examining the witnesses was provided to the appellant. The appellant was not confronted with any evidence showing misconduct. The inquiry is defective, because the appellant was not associated with the inquiry proceedings, thus the impugned orders have been passed illegally.
- D-That the appellant was not provided with the finding of the inquiry report, although appellant has requested to respondent No.2 and 3 in written as well as in oral form, thus the appellant has been deprived of his right of defense. In this way the respondents have violated the fundamental rights of the appellant guaranteed by the Constitution of Pakistan.
- E- That the appellant has been punished on the basis of no evidence and the appellant has been convicted prematurely, because the trial is still pending the appellant has not been convicted by the criminal court.



- F- That the appellant's previous service is un-blemished and the appellant belongs to a poor family having small kids and except this employment appellant is having no source of income, so if the impugned orders have not been set aside the appellant's small kids will suffer irreparably.
- G-That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject and the respondents have violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- H-That the action of the respondents is without any legal authority, discriminatory and in clear violation of fundamental rights duly conferred by the Constitution and is liable to be declared as null and void.
- I- That as the act of the respondents is illegal, unconstitutional, without any legal authority and not only discriminatory but is also the result of malafide on the part of respondents.
- J- That the defense of the appellant and role attributed to him in the criminal case was not taken into consideration by the respondents before passing the impugned orders.
- K- That the appellant seeks permission of this Honorable Court to raise any other grounds available at the time of arguments.

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

APPELLANT

THROUGH

Nasir Mahmood

Advocate Supreme Court of Pakistan

Add: Office 622, 6th Floor, Pak Medical

Center, Peshawar

Affidavit:

I, do hereby solemnly declare and affirm on oath that the contents of the above Appeal are true and correct to best of my knowledge and nothing has been concealed from this Hon'ble Court.

DEPONENT

في اجراني دوع نبت يرع والارت اوري العالمي المعالم والمواج المروة المرواق المرواق من الاروس بالموادي المعادية عنامونت ور عدد المان مديد المان الما فحينت اطلاع وبندو ومتنيش. 0344-9796258 SHOISE ت جرُم (مودنع : صل محركي ياكي بو - 012/8 700 (July 39/0) CNSA فوفاطهمقادسه اوميست لؤن راد: ٥ ما د مندي كرك 14143-598710-8 فنعامل و تنتيارهان و المام مكنه عن لول و عاديد تشد ل وار مشرا المين موا وتغيش كم متعلق كالمحي أكراطسلاع دري توقف بوابوتو جبر بيان كروunially sold in سے روانگی کی تاریخ دوقت ابت لى اطلاع نيم درج كوري، در سرسوان المراس معاد ريان المان دي والراب المراب المراب المواجعة المراب المرابعة المراب ميزارين بالقرائيهما عاران الباسا الأولام الموثرا والموثرا Leis July 14 months of the man policy of the state in started the second of the second of the Clarentes 84. 160 AC - 15 6 11 11 11 11 11 11 The state of the s からないのうことのなるとのとしては、サインでは

ORDER

This order of mine will dispose off the departmental enquiry against Constable Attiq-ur-Rehman No. 739 on the basis of allegations that he while posted at Police Lines Hangu have directly been charged as well as arrested in case vide FIR No.490, dated 24.07.2020 u/s 9-D CNSA P.S City District Karak. Resultantly, he suspended & closed to Police Lines Hangu vide OB No. 181, dated 28.07.2020. He being a member of disciplined force has committed a criminal case showing his gross misconduct on his part, which cannot be ruled

Therefore, he was served with Charge Sheet & statements of allegations under Police Disciplinary Rules 1975 vide No. 42/EC, dated 06.08.2020, for which he submitted his reply to Zahid-ur-Rehman, Inspector Legal Hangu appointed as Enquiry Officer into the matter. After completion of enquiry, the Enquiry Officer in his finding report dated 02.09.2020 held him guilty of the charges and recommended for major punishment.

Thereafter, a Final Show Cause Notice was issued to him vide No. 202/EC, dated 04.09.2020 and he submitted his reply, but the undersigned not agreed with him thus, held him guilty for the leveled charges.

Similarly, he was summoned to appear before the undersigned on 29.09.2020, but did not turn-up.

Keeping in view of above facts and having gone through available record, the undersigned has arrived at the conclusion that defaulter Constable Attiqur-Rehman No. 739 being a member of disciplined force, had acted criminal gross misconduct. Moreover, in such circumstances, he is a bad spot on force and his retention in Police Department is burden on public exchequer, therefore, I, Shahid Ahmed, District Police Officer, Hangu in exercise of the powers conferred upon me, awarded him major punishment of Dismissal from Service from the date of his suspension i.e 28.07.2020 with immediate effect.

Order Announced

OB No. //2020

> POLICE OFFICER. **HANGU**

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. $\frac{\sqrt{346-68}}{EC}$, dated Hangu, the $\frac{\sqrt{2}}{\sqrt{2020}}$

Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat for favour of information please.

Pay Officer, SRC, Reader & OHC for necessary action.

DISTRICT POLICE OFFICER,

Anneal C

POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Attiq-ur-Rehman No. 739 of Operation Staff Hangu against the punishment order, passed by DPO Hangu vide OB No. 232, dated 30.09.2020 whereby he was awarded major punishment of dismissal from service on the allegations of his involvement in a criminal case vide FIR No. 490, dated 24.07.2020 u/s 9-D CNSA, PS City, Karak.

He preferred an appeal to the undersigned, upon which comments were obtained from DPO Hangu and his service record was perused. He was also heard in person in Orderly Room, held in this office on 09.12.2020. During hearing, the appellant failed to advance any plausible explanation in his defense.

I have gone through the available record and came to the conclusion that being a member of disciplined force, he is directly charged in FIR and the same has also been established by the E.O in his findings. Therefore, the allegations leveled against the appellant are proved beyond any shadow of doubt, hence his appeal being devoid of merits is hereby rejected.

Order Announced 09.12.2020

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

dated Kohat the 17//2 /2010.

Copy for information and necessary action to the District Police Officer, Hangu w/r to his office Memo: No. 11660/LB, dated 12.11.2020. His Service Roll & Enquiry File is returned herewith.

Attested to be true

OFFICER HANGU

TAYYAB HAFEEZ) PSP

Region Police Officer

/Kohat Region:

(10)

⇒To

The Regional Police Officer

Kohat Region, Kohat

Subject:

DEPARTMENTAL APPEAL

Respected sir;

With due respected, appellant submits departmental appeal against the order of district police officer, Hangu bearing of No 232 dated 30-09-2020 vide which appellant was dismissed from service.

FACTS:

- 1. That appellant had joined police department as constable district Hangu in the year 2009 and qualification basic and other course and was rendering services to the entries satisfactory of senior officers.
- 2. That appellant is native of district Karak and the family of appellant is entangled in chronic enmity with co-villagers. Several persons of both the sides lost lives in the enmity copies of FIR's are enclosed.
- 3. That appellant usually used to hire a motorcar on rent for visiting to home to ensuring safe journey; therefore as per routine; on 24-07-2020, appellant district karak hired a motorcar on rent and left for home village at Takhtye Nasrati.
- 4 That on reaching the limits of Police Station ustrazi District Kohat la passenger gave signal of stopping and the appellant stopped the motorcar and the said person placed request for lift and appellant accepted the request
- 5. That during course of journey the said person disclosed that he was going to district Karak. Therefore appellant did not drop him at Kohat.
- 6 That on reaching the limits of old tool plaza district Karak Police Stopped the Motorcar for checking and allegedly recovered charas from the bag of the said person
- 7: That: the Police mala-fidely implicated; the appellant in the alleged recovery of charas from the Co-passenger vide file. No 490 date 24-07-2020, under section 9-D GNSA Police Sation city Karak

That the Honourable Peshawar High Court Bannu Bench granted bail to

appellant and appellant submitted arrival for resuming duties.

That appellant was pro-That appellant was proceeded against departmentally on sole allegations of involvement in above involvement in above mentioned criminal case and the departmental proceedings culminated proceedings culminated in passing the impugned order. Hence this departmental appeal on the passing the impugned order. departmental appeal on the following grounds.

GROUNDS:

- (a) That the impugned order is void ab initio as no charge of commission of misconduct was level misconduct was leveled against appellant. As regards the criminal charge, it is well settled principle. is well settled principle of law that accused is innocent until and unless the charge is proved and accused is convicted. The criminal charge is still pending trial and the lower authority passed the impugned order.
- (b) That there is every probability of acquittal of appellant in the criminal case as the alleged recovery was not made from the direct possession of appellant. Again appellant was native of district Karak and was on way home and the alleged recovery was made from the bag of co-passenger going to district Karak and was having no justification of visiting district Karak.
- (c) That appellant was completely condemned unheard during course of enguiry proceedings. No one was examined as a witness in presence of appellant. No chance of cross- examination of witness was provided to appellant. Appellant was not confronted with any evidence showing commission of misconduct. The inquiry is defective as appellant was not associated in the proceeding furthermore, the impugned order was wrongly passed with retrospective effect.
- (d) The appellant was not provided with the copy of finding report of enquiry officer appellant submitted written application but was not accepted Opportunity of fair defense was not provides to appellant
- (e) That the charge sheet is sued to appellant was not constituting commission of misconduct as only reference to involvement in criminal case was made in the charge sheet:
- (f) That appellant has been punished on the basis of no evidence The impugnediorder is pre-mature as the criminal case is still pending trial
- g hat appellant previous record of service is unblemished and also belongs to poor family. Therefore dismissalifrom service order amounts to stopping the ration of the entire members of the appellant

(h) That the defense of appellant and role attributed in the criminal case was not taken into account before passing the impugned order.

With all back benefits.

Enclosures Copy of impugned Order and 06 FIR

> Yours Obedaintly

Ex-Constable Atiq Ur Rehman No: 739

District Hangu Cell# 0346-9251610

Permanent Address:

Village Shanki Banda P/O and Tehsli Takht e Nasrati District Karak

دعوى 7. ماعث تحريرآ نكه مقدمه مندرج عنوان بالامیں این طرف سے داسطے پیردی وجواب دہی دکل کا روائی متعلقہ آن مقام بسلمد كياء فالمرتحدد المنك ميك مقرركر كا قرادكياجا تا ہے۔ كەصاحب موصوف كومقدمه كىكل كاروائى كا كامل اختيار ، وكانيز وكيل صاحب كوراضى نامهرف وتقرر ثالت وفيصله برحلف دسيع جواب دبى ادرا تبال دعوى ادر بسورت ذاكرى كرف اجراءا درصولى چيك دروبيارعرضى دعوى ادردرخواست برسم كى تقديق زرای پردسخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری پیطرفہ یا بیل کی برا مدگی اورمنسوخی نیز دائر کرنے اپیل مکرانی ونظر دانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ ندکور ككل ماجزوى كاروائى كے واسطے اوروكيل ما مخارقانونى كواسيند بمراه يااسين بجائے تقرركا اختيار موكا _اورمها حب مقررشده كوميى وبي جمله فدكوره باا ختيارات حاصل مول محاوراس كاساخت مرواخت منظور تبول موكا_دوران مقدمه من جوخ چد مرجاندالتواع مقدمه كسبب سوموكا_ کوئی تاریخ بیشی مقام دوره پر جو یا حدے باہر موتو وکیل صاحب پابند ہوں کے کہ بیروی لمركوركرين بالبذا وكالهت ناميكهديا كدسندري Just feet کے لئے منظور ہے۔

PERIORE THE HOMORABLE, SERVICE THURSDIAL RESERVED FARISTONE TO SERVE.

Service Appeal No. 819/2020	•	•	
Attiq ur Rehman, Ex-Constable No. 739	•	*************	Appellant
		1	

VERSUS

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Deponent Inspector Legal, Hangu

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SEREVICE TRIBUNAL, PESHAWAR

Service Appeal No. 819/2020 Attiq ur Rehman, Ex-Constable No. 739

Appellant

Wersus

Inspector General of Police, Khyber Pakhtunkhwa & others

. Respondents

PARAVVISE COMMENTS BY RESPONDENTS.

Respectively Sheweth:-

Parawise comments are submitted as under:-

Preliminary Objections:-

- i. That the appeal is barred by law and limitation.
- ii. That the appellant has got no cause of action.
- iii. The appellant has got no locus standi.
- iv. That the appeal is bad for misjoinder and nonjoinder of necessary parties.
- v. That the appeal is bad in eyes of law and not maintainable.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.
- vii. That the appellant is estopped to file the instant appeal due to his own act

Facts.-

- Appointment of appellant, pertains to record, hence no comments. However, the appellant alongwith one Javed Magbool s/o Magbool Hussain r/o Usterzai Kohat was driving a motorcar and proceeded toward*Karak on 24.07.2020. The local Police of district Karak intercepted the vehicle at Toll Plaza Karak, During search of vehicle Charas weighing 7000 Gms was recovered from the motorcar, which was seized by the local Police and the appellant alongwith co-accused were arrested in case FIR No. 490 dated 24.07.2020 u/s 9D CNSA. Copy of FIR is annexure A.
- 2. Incorrect, the appellant while posted in district Hangu Police alongwith his co-accused trafficking narcotics in a motorcar, who was subsequently arrested by district Karak Police. Hence, no malafidy on the part of Police are anyone else is involved into the matter.
- Incorrect, the recovery of narcotics was effected by the local Police from a motorcar driven by the appellant and no malafide on the partition and involved.

- The appellant admitted travelling in a motorcar toward his native village. The remaining para is incorrect and without any cogent evidence. The coaccused arrested with the appellant was companion of the appellant and they were jointly trafficking narcotics.
- 5. Incorrect, as explain in the above para.
- 6. Reply is submitted in the above paras. However, it is stated that the appellant has admitted his arrest and recovery of narcotics from his motorcar.
- 7. Incorrect, no malafide or bad intention on the part of Police is involved or established by the appellant. The appellant alongwith his co-accused was arrested red handed by police while trafficking narcotics.
- 8. The appellant being member of a disciplined department indulged himself in trafficking of narcotics / moral turpitude and earned bad name for the department. Therefore, a regular inquiry was initiated against the appellant and after fulfilling all codal formalities, the proceedings culminated into his dismissal from service as, his retention in a disciplined department shall cause damage to the image of Police.
- 9. The appellant is estopped to file the instant appeal for his own illegal act and wrongly challenged the legal lawful order of respondent through unsound ground.

Grounds:-

- A. Incorrect, the appellant had committed a gross professional misconduct and criminal act as well while trafficking narcotics. The appellant alongwith his co-accused were arrested red handed while travelling in a motorcar. Therefore, the appellant was proceeded with departmentally under Police rules 1975 and the allegation / charge leveled against the appellant was established beyond any shadow of doubt. Therefore, on completion of all codal formalities, the respondent No. 3 passed the legal order based on facts and evidence. Similarly, the Respondent No. 2 correctly rejected departmental appeal of the appellant after due process. Furthermore, criminal and departmental proceedings are distinct in nature, which can run side by side and order / judgment passed in criminal proceedings is not binding on the departmental proceedings.
- B. As submitted above criminal and departmental proceedings are distinct in nature, which can run side by side. However, the appellant was held guilty in the departmental proceedings and the respondent No. 3 being a competent authority passed the legal order.
- C. Incorrect, the appellant was associated with the inquiry proceedings, heard in person by respondent No. 2 and 3 on 09.12.2020 and 04.09.2020 respectively. He was afforded opportunity of personal hearing by the

- respondents, but the appellant failed to submit any plausible explanation to the respondents.
- D. Incorrect, the appellant was provided the relevant documents with final show cause notice to which he filed reply. The appellant did not raise question of non-provision of the inquiry report in his reply to the final show cause notice. Copy of reply to final show cause notice is annexure B.
- E, Incorrect, the appellant was arrested by local Police of Karak while trafficking narcotics in a motorcar. Thus there was sufficient evidence on record particularly investigating of the case. Copies of recovery memo and case diaries are annexed as annexure C
- Infact the appellant committed grave professional misconduct by involving F. himself in trafficking of narcotics. In this respect proper departmental proceedings have initiated in order with law and rules and he was found guilty.
- G. Incorrect, the appellant was treated in accordance with the relevant rules and all codal formalities were fulfilled during the course of departmental proceedings by respondent No. 2 & 3.
- Η. Incorrect, as replied above, the appellant was proceeded with departmentally in accordance with relevant rules.
- Incorrect, reply is submitted in the above paras.
- J. . Incorrect, the appellant failed to submit any plausible explanation and advance his innocence during the course of departmental proceedings
- K. The respondent may also be allowed to advance other ground during the course of hearing.

Prayer:-

In view of the above, it is prayed that the appeal contrary to facts, law & rules, devoid of merits and not maintainable may graciously be dismissed with costs please.

Dy: Inspector General of Police

Kohat Region, Kohat

(Respondent No. 2)

District Police Officer,

MHangu (Respondent No. 3)

Seneral of Police. Khyber Pakhtunkhwa, (Respondent No. 1)

ابتاربي اطلاعي ركورك ائیل ایدایی اطلاع نسبت مرسم قابل دست اندازی بولیس دبورت شده زیردفعه ۱۵ امجموع منابط فوجوادی 413:20 00024 = 4:20 (10 A4 - Por E 6 Swip 8:13:35 :33/11 2746359 SHOWE تؤينت ادللاع وبنده واستغيث نيت جرُم (مدرنعه) حال اگراه الكيابهو - Craff 7000. (ININSP(D) CNSA 11301-4857171-7-10160/1 رة عرفا ضل القائد سے اور سیبت with the color is to a day city the 1. E L'Obserden in All است لاق اطلاع ينع درج كور برك در برك در المرسوا س طري الله ملا سان بال دور دو مدر برو درج دیل می دور مام ۱۱ مروز وی مونشون خراب دود ، بال وي د بارزه بريس شان رياره الول بال و نافريل سي لاعال العام وعرفال ليدره فدرس بومت لوماع و فريس ورو و وهد يرجان لوق 16/2/2013 613 Silo Oper 1901 86 1 19 185 18 نے ریار ساکھا در کارس کے بہادل فیلے کے برامام کی دریات پرانیا کا عَيْنَ الراف ولا فيدا مليهما في مدر تحيث لفيل كدال بالإ-جيار ولركار لا غرنت سيق به Plan is Griding Strange 146 Will you will Justo Efficiency Billy & Colors Constitute of مرسط مع المار ما أر ما در ما المار المرافع المعالم المرافع الم رسانام ها در معران ما در معران ما در المعران المعران عول المعران المعر معارض و مرا مر در در ما لا لوسروع ورد خربولی و در در الم

Junaser se B

FINAL SHOW CAUSE NOTICE

WHEREAS, you Constable Attiq-ur-Renman No. 739 proceeded against departmentally on the basis of allegations that you have been directly charged as well as arrested in case vice FIR No.490, Dated 24.07.2020. U/S 9D CNSA P.S City District Karak. Resultantly you suspended & closed to Police Lines Hangu vide OB No. 181, dated 28.07.2020. You being a member of disciplined force has committed a criminal case showing your gross misconduct on your part, which cannot be ruled out.

THEREFORE, you were served with Charge Sheet & statements of allegations under Police Disciplinary Rules 1975 vide No. 34/EC, dated 13.05.2020. Mr. Zahid-ur-Rehman, Inspector Legal Hangu appointed as Enquiry Officer into the matter. After completion of enquiry, the Enquiry Officer in his finding report dated 02.09.2020 held you guilty of the charges and recommended for major punishment:

NOW, THEREFORE, I, Shahid Ahmed, District Police Officer, Hangu have vested the power under Police Disciplinary Rules, 1975 liable to take action against you.

Your reply to Final Show Cause Notice must reach to the office of undersigned within **7 days** after the receipt of instant Notice. In case of failure, it shall be presumed that you have no defence and ex-parte action will be taken against you.

No. 202 /EC,

Dt: 04/09/ 2020.

DISTRICT POLICE OFFICER

معرف معرفا معرف/۱۱/ کو عنهی نے فور سرفا ز لونس کای وجول تھا۔

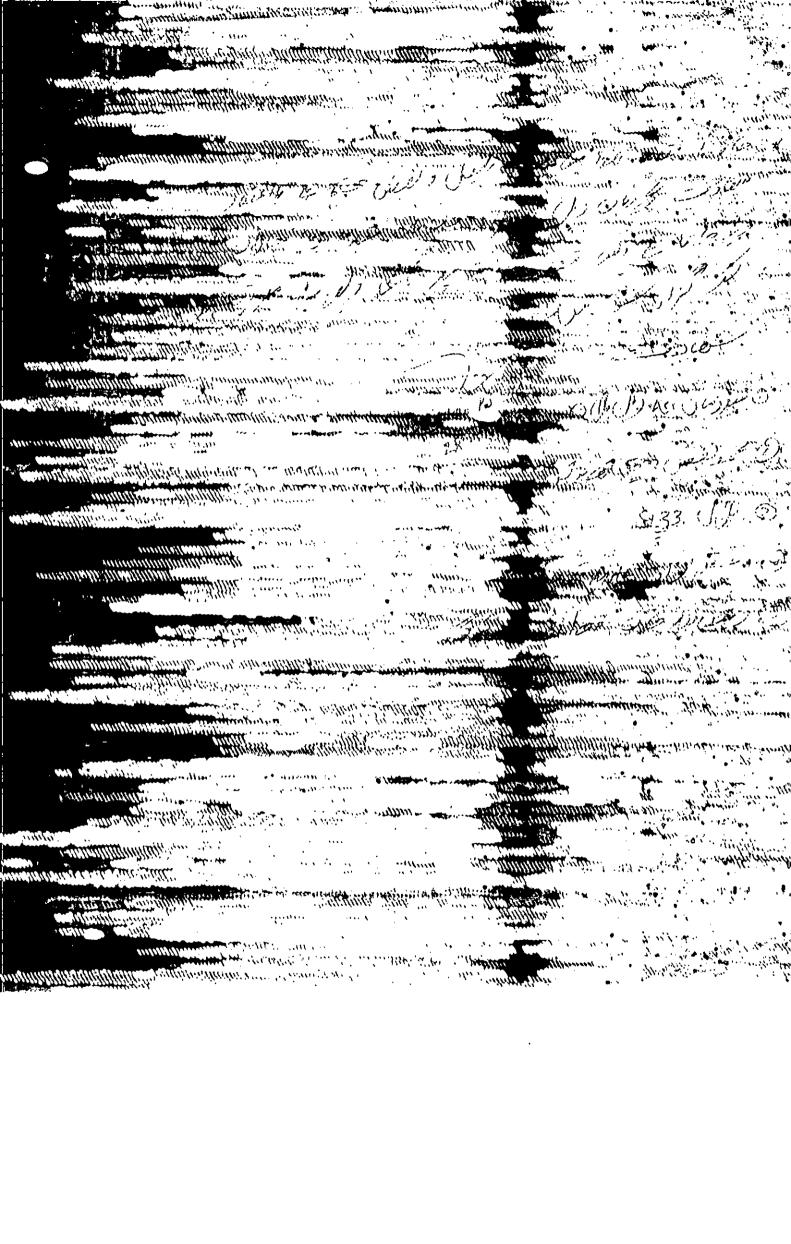
برت ولين انبر ي و ما تو له نولي · Oz Cio (pio/2) 4 20 je 3 202/fc UT السناس بى مرست اور فرائم سلم آفرار كو دفك دها میں ابی دسراری اور صر لیے سے ساری ر سابوں 500 21 24 20 E3 00 21 16 2/2 00 alignity (3) dis (5 0 2) : (3 m/3) com منا بن من من ودات ما ودات ما ودات ما 5/12/16/06/06/16/15/656 Cins = 6,5 المن المرة المراف المرا ورا داره و در سرس ایس نوس کورا و در او ای (からしとうしい) ことしているのかのかり こりのうとこらいはニールではからにはいっという (مربی مے واتا این ایم سی دولی می مور دولی سرای) ديما عن المعرى وروره عيار الروري عن كرك واو نظا مر القرام القرام المرام : 6 de sin 15 de se sui de l'élie de se l'élie de le se l'élie de le l'élie de تو لوبر بین بوس نے دیے کا اشارہ کی وسی کرنے ہے

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ليكس فارم ۲۵ بـ۵ (۱) يوليش عنه نياس 5 3111 حصداوّل (بيرونّ) ار ورث کافمبر ثمار وروافي كل كل Maysin illest of lin ascon delicenciano o The To William Michael Sand Michael 24-8-20 2 6 2 9 8 00 Car for 10 6 7 10 5 16 TO Select PR Consider Child 29:17 Subject of the star PR Boll. 1, 23 1/2 5 133 - 1 5 C22 0 - 1/2 0 Mil & THE STATE OF SUPERINDING THE 2 62636 (4 3 M 6/1/17 5 1/1/19/19 injulation of the Charling Office All In March Sandy Some The port to be the grant sold to 1 30 1/1/62 8 19 3/1 2 San July 123 de proof with proof in a fight deprice per and the property to the supply 6-15- postes of will 757

With the with promine of the wede - Bright Control of Bright Con discopie of the Control of the second of the Constitution of the South of the state of the state Day livery Mille in wo The War to Airline 1120-1016 (Way) 5133 Chr () The Gay , Breit 215 Lago Eman fresh until Com Com The · Ophing one 2-11-11-12 (1/2012) Charles Sin - 10/2 1/2 1/2010 = 14.48-00 THE TO CONTRACT OF SECULARION OF SECULARION SECURIARION SECURIARIO 3. Africa of the Start Continue of the Sois Over Charles The Son Min Charles Jest of Bone When I was as for a 19 it 11238617013-8000 (1977) 1971 ON 14 15 13 18 Lote alle sur ring flight dison with to 5000 July AS OU 3- 200 SIN -Mark de & Chy for I To Mish the Co Sup Sup. 2 Complete Marin Com The and menting out the first for by min STONE Side Will Confidence of the Confidence of (10) file for the the Chargens before the inso to The Line of bounded of see configuration of the line of the line

تعریش قارم ۲۵ ۸ ۵ (۱) پولیس فارم نمبرس 1 Je l 1 man حصراة ل (بيروني) 490 24 - 7-2020 تحالنه مين موصول بهر نزكا وقت وتارخ بيض 9 (D) CNSA نه وفتت حزليزك كالمبرشار لي كي كي حالات تفتيش SHO Che pak with The sty (die ile Condo do do do vier us to O: Phis و مقيق الراك ولا محمد اسلم في مقد الله على المكان مقد الله في 5-8-20 The Constant of the season of the second Asi Ohi was Chie of the of the color of the one (u) c) (i) i) i) i) (i) b) (i) b) (i) b) 2/ 1/25 title ciejes by ling of the ship in 10/20 if one to we for the soft with the first Bluja Chil Cup Post & me Cui ne Chi 915 7000 pe 100 min in 1 2 min in 1 2 min in 1962 in 10 191, ما ر مند شر م فی ار در از مناه الواسی کی اید و تو کمدان کو مرکب Con no me work of the state of Che of Ob win Son Court Grand New ins white of the company of the service of the 8.35 N CM 25 N CE 10 1 10 161 100 200 on and of one is in Sou Diaster 20 610 30 (2) Our Hand Grand of the property of the wife 164/269 to be with one lie was to the following 1725 A Le 1102 For Washing 24 July 14 86 Sully



برایس نارم ۲۵ مه ۱۵ (۱) پولیس نارم نمسر ۳ ر لورسط کی . حصهادّل (بیرونی) 9 DIENSA الرفيس المان طالب تنيش ويسر شرار الأ . درت کانمسرشار جس پر کاروائی کی تی - Si 123 Spe Dack- 15 - 2-14 الم : والولا منول من المقول الله المال المراد المال المراد المال المراد المال المراد ا Bil CE in West And Decision O 4-8.20 1/ (but) 177 8 6/1/1/100/18 Over 0) Ever 10/1/3 27-67-20 en illans fred as Spiral and South - e 309.00 Of and of Simuorian Wille a visor D Lichty- Filister Ou Children Children of divides we involved af Juli a Bus 7.' . 14.00 Chi co in du - 2 200 Poplace de si sin Well andi cin cun - 3 land @ 282 6 1 100 m in flam 35/36 ch 200 July & Formeling in figure 10 10 du July Misting will be property 1250 All place - and and Colones Colones (38

The will - OPW To Edua- Wa Come ad 22 Pil & The Police Oble Com in the Bor Smith The Will was a by mountaining would store die unte Wir Charles State 15 3111 On on the 2410 ille for some time in face for Copper of Secretary our plant designations 1-0660 - CAR GUS THE CHE UST 271-2 with the wife of the Sign the Sign to the Sign of the stay to and the works as less the consider phone 2 is 011 Mil

باليات ودرووكم الهافؤة ال معزم سنن الرحمان والمثرز - المان سعوم وفية بوق الدين الرحمان ووفي الم 1) 1 vibyo 2 0335-1996 974 20 july 14203-5996710 ولا أي من حرون و في من وطريس ل عرق بوا يون فا وَن من رين عنى وقائل فى و المعالى مى ويون المالى مى الموسى الموسى الموسى الموسى الموسى الموسى الموسى الموسى الموسى الم ور الرك رصام مون كيونل مرا و فرسدها و فون مين سرع يه فاما مقيل مرا المراس مي المراس ال وي ورزوة ورس من لوير مارك و تعمادا بيا ، معما و تيرميرا أ درق اس و توان عرف ما ا ساره د مرس د گاری دون د در فوره مرسان س مرة ما قل ما و مع الما و مع الما و المع الما و الموادن تلى مر سانع ون سن سع د دروه دس نوانه سانه بي نوان و سن مول شون سانه و سا ره سن - ووس دون ما ز شاوه رئيس د داري دون دون من مُدَّى الْمُرْكُورُ وَالْمُرْكُورُ الْمِسْ الْمُوْرُ الْمِسْ الْمُوْرِ الْمُولِينَ الْمُولِينَ الْمُؤْرِدُ الْمِسْ الْمُوْرُ الْمِسْ الْمُوْرُ الْمُسْلِينَ الْمُؤْرِدُ الْمُؤْرِدُ الْمُسْلِينَ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُسْلِينَ الْمُؤْرِدُ الْمُؤْرُدُ الْمُؤْرُدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرُ لِلْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرُ لِلْمُؤِلِ الْمُؤْرُدُ الْمُؤْرِ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ الْمُؤْرِدُ ا معتول حديث سونم على أنار معنا و دين سي سي سي در المرسور ع دولون Q. il. 1 v. 01 y oli 2 les . 114 عة المرا والولا عوالول ولافعال على الما وعالم والمرا للم 0331-5848014. ور سر في رود و عنام مع رود المرد في المود الله و ال أنا بداها وقورة ما استان ريد و بن ريز ما ديوى روايي جرد واسور Cutipo 2 che ce ces milio . Et les son bip à objet و من مولان المحرف المالوك المالوك المالوك المولان المحرف و المولان المحرف والمالي والم فرن دُور بيل سي جراى رؤيرى (ور فيم جرون و رُ ناريل و جرا justi of bili 1 com where a le bolo) in som wi زه و شار می مرسر امان کا photos allows

يوس فارم ۱۵۰ مه ۱۵ (۲) پرلیس و آم نیر ته (5) (man))) جَصْداوٌل (بيروني) تارح محدوفت جس پر کاروائی کی گئی والمراكرة حالت المنتش درولعدید کفی فاق مان کافات والی فارک و ال ماورود اول وارمعتول ويونوس، ملي الم ومعنال मिस्डा . १० है। हैं एका मार्थ के कि कि कि مرست ولي العدامسًا إلى مع والما و والون مع فا فله و و و مناور و مناور و مناور والدان تقاندس رافع و و دور است کوری دی دی دی داری دوروس gérie 2532064 voloappeleinte المع وق ورق الله الله الله الله الله المعالمة ال 2) fine et de comp 29 à évoir és à jours will be will be will be to the selection of the last किंगी के किंगी के हैं। है कि की में कि की की किंगी के किंगी किंगी के किंगी किं من المرقان المركان والرائم والمركان المولان Eiste Elle Delle Delle Belle Belle Bille South Ken Resolved of the Consider

wid . Vi 25.0 دماح و من برها بوی کی بدری و ورد و بره وول ا ما دو لیزی

قارم ۲۵ م ۱۵ (۱) بوليس الخوم حصداة ل (بيروني) mis 24 - C7 7 - <u>2020 - 3</u> جس پرکاروان کی سنی مروا بر در خری ای خان میرک درا فروده سام: - ال مستين الرفيس أولد فرار المفان سدين لات و قابل (विवाद के कि कार के कि कि कि नहीं महारंग की विवहार है حرا عالى ! صلامت وزرم كرافي بور، معيد في الزمان الدعوالي V15:02 عديد و و استول ماعل ديد در در و ادان هادر ميل الموان و ت در الرسان ورست فروس و و الما في ما و و تروه ويل ما اوراه وَيَعَ الْمُؤْمِ الْمُؤْمِدُ الْمُؤْمِنُ الْمُؤْمِدُ اللّهِ الْمُؤْمِدُ الْمُؤْمِ الْمُؤْمِدُ اللّهِ الْمُؤْمِدُ الْمُؤْمِ لِلْمُؤْمِ اللّهِ الْمُؤْمِ الْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ الْمُؤْمِ لِلْمُؤْمِ لِلِمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلِمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمِلْمِلِمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمُؤْمِ لِلْمِلْمِلِمِ لِلْمُؤْمِ لِلْمُؤْم فَ لَ وَ وَ اور وَ لِي الله وَ وَالْمُ اللَّهِ وَ اللَّهِ وَ اللَّهِ وَاللَّهِ وَاللَّهُ وَاللَّهُ وَاللَّهُ اللَّهُ اللَّاللَّ اللَّهُ اللَّا اللَّهُ اللَّهُ اللَّا اللَّا اللَّهُ اللَّهُ ا نَ يُرْجًا مَا يَعْ - تُرْجِينِ رِسْدُ مِنْ وَقُرْمًا رَزِرُ لِفِسَانِقُ (فِانَ نيون . فوند ويون فا نازى مليا مراها فا تعلي ني ع بعدْ وقور ابن سي الله وسيان ماري رسي براي وس فارْن ورَفاره في حَنْ الْمَا عَنْ الْمَا عَنْ الْمَا عَنْ الْمَا الْمَا عَنْ الْمَا الْمَا عَلَى الْمَا الْمَا عَ وَ وَ وَعَ مَا وَ مِنْ الْمُ وَ يَكُو سِي وَ كُوسٍ - سَرُورُو وَ وَ سَارُولُ عَادُولُ عَلَالِكُ عَلَى اللّهُ عَلَيْكُولُ عَادُولُ عَادُلُولُ عَادُولُ عَادُولُ عَادُولُ عَلَالِكُ لَا عَادُولُ عَادُولُ عَادُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالْمُ الْمُعُلِّلُولُ عِلْمُ لِلْمُعِلِقُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالْمُ اللّهُ عَلَالِكُ عِلْمُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُ عَلَالِكُ لَالْمُعِلِقُ لَالْمُعُلِقُلُولُ عَلَالِكُ لَالْمُ عَلَالِكُ لِلْمُ عَلَالِكُ لِلْمُ عَلَالِكُ لِلْمُ عِلَالْمُعُلِقُلُولُ عَلَالِكُ لِلْمُ عِلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالِكُولُ عَلَالْمُعِلِي لَالْمُعِلِي لِلْمُ لِلْمُ لِلْمُ لِلْمُ لِلْمُ لِلْمُ لِلْم مانيس ماد برس من درون من در من در من در من در من درواره فيرى مزوده ما مرس مول مو رفعر المعرب والمرابي وووده و خورها درس الله المروم و المروم و المروم الله المروم برست ومن م فل ميروه زي سي - تروطان مر وري الم عين دان of will on 200 200 of the search of the of the 16 اور ويو را كون بهر اور ما زره فران د برق و ويف د ير (.53)

لي سي بيدور ن دارسوا . في ميم بديقا . ندير وره بوره بوران سياري بن من فرس بن . رسی ار را منزم ما و بر فرا ل و بدها ک کنان 2.036 Ngojo w F. well culipi Sies, Tilleju ر الله المعالم المعرف المعالم المعرف المعالم المعرف في أرسين وسي في ما و الما و و ما من برا من بلام على مروه و موادا دی - سراس می در اس می در استان می ر مع دواند معلی جمع این می میرو آن می رون مورد ماری المان فرمی این می درس داند کار در در دونون کو سي توايز لي طوط يقا- كيدا نادو ين المتعامان مع فليرود طراقاً Cider la ben of the contest of the contest of a contest o مانعان و سامات مانده وسان نفاطرور و ورورا و فلمسان Michiel und - 2 into a wine of the on ni / Km / KK 26-07-030

43/6/3/61 · U/16 9(0) CNSA p. 524 37 00 490 Cilinosa بنام بـ و عنه عام تمن ولد الحمال الم خال تراث الم الما الم Herseliedes appeining out of the se do done is a la @ Chile the Comfall to his control with its كالزائرة الرياد الملاع الملاع الراس ع SHO/3.16 24-07 020 Sile Chile Underchie. JU 34/35 & 5.9 F Alisa Legal Augu Micz. 14203-59767/0-9 Mobil 0335-1996974 water of lander · Ut Alimention Ul-19/20 & 5-72 Nic 2-14301-4857171-7 Mobil 0331-5248014 31

ي الم مرك Y de se se f 2/16 9(0) CNSA 19 2 24 07 10 490 Celleris · 4) Cod Cod of - 010/ 12 4, 020 July 010/ Hydewes which with our done is I live a معبروكوا والناويل ففيص منوان بالرحين بدوران بالهارى كيصورفاد عبر 485 من الله الماسم الخرس المالك كالماري ولا يورموثر كال في الزمار ما من المعالم المعال ومافت برايدانا عنيق الرفين وله فيها موان عالى عالم اللهار Jalunters of the Company of Tool Chip CURRENS 6965 PLENTE 2512/10/2/2/2/2/5 من المعالي المعالي المعالي المعالي المعالية المع غصر اللي المراسي الرائي المراسي تيريم منظر المراس ع والركالا تراكره طاليكو بروغ وزد منهم لوليس من يك فعرد صوفع برسرت نترية تواطان سي الرائز الم SHOPSKIK 24-07-020 مع والريخ زمان الع المام دك · Winy is aspir w 32 200 cm mos 2/1600 cm 7. 6. 7. 40. 200 200 195

a steller of Tide my de difficult the best to the 1 are Sito O to the sty mo & pason for and the wife is it so for five the Chia Dolla Ste 2 pass 3 1 Plas 200 60 M Con Doll 5103 Com O of 4 10 العراص المرابع المعالم المعادر الماسي الماسي الماسي المعالم ال The State of the State of the State of the state of List by with the to the the winder of 2 Jucho Sin Q-Ville of Cir care Cas Fl Julies this enthist the busing esceptification and 2- Carly por Com is a les constitutes as the constitution of the CONTINUES COUNTED THE TESTERS OF THE THE 1 1 01 1 1 1 1 07. 20 2 cher 1 500

28 Just - Wylu diger Elias suo dieses w 2 Chippy & chickers metal cigal the gra. (38

01º161 1900 00 6 le. ن عقان عدى وور شروز مان دور قري 35/32 مال شامعي اوز، 60-x0335-50165392-1269 35 14101-14034757 مِن ماور م معنور خروراند و لي مان سي در هون الدي رمن کاروروه فعنی و ای ای اس کا دی بوروروری من الله و عبر بون ها 80 كر جاوير مقبول سالن على المار ورند ما در فار آنا . ١-٥١ من و فالولا وقاول كرولونال بر فرق ألى اورد بالم عمين ارك ناميري موسة معادة के निष्ण हे ने तहा हिला है है। के हिला नह में भी है। के अविद्या है ووج ماره و مرفقت عادن المارة وي () है है के कि कार्य कार्य के कि है। कि कि कि कि कि Jest col mosorce roles es entillas es las las July 1 2 3/6 (COLIE 20013. 20 6 2 We I'L (56 1 -हैं का दे तर हि का रहि के - जी हार कहि टिक्ट का का कि है है। हिंदी i greenent of 30000 word flor - Jours is it. مادروه و سان و مار و مار در معانه و مع ما مار معانه و رن و مع مقامرة ك المراج المراج المراج المراج المراج المراج المراجي عالى زن وَوْدا سَوْرُونَ لِينَ الْوَلَا لِي وَلَا لِي الْمُولِ وَلَا لِي الْمُولِ وَلَا لِي اللَّهِ اللَّهُ وَلَا لِللَّهِ اللَّهِ اللَّهُ اللَّالِي الللَّا الللَّهُ اللَّهُ الللَّهُ اللَّهُ اللَّهُ اللَّا الللَّهُ اللللَّ الروزين مي سوماولاميدل هر براوري كابري عي-Los of the Companies of the survey of the su

SERVICE THE HONORABLE, SERVICE THE RONDRABLE, PESTIVALE KNITCH PARTIE OF THE PROPERTY OF THE P

Service Appeal No. 819/2020 Attiq ur Rehman, Ex-Constable No. 739

Appellant

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa & others

.....Respondents.

AFFIDAVIT.

I. Ibrahim Khan, Inspector Legal Hangu do hereby solemnly affirm and declare on other that all the contents of accompanying report are true and correct to best of my knowledge and belief that nothing has been concealed from this Honorable Court.

Identified by

January January

Inspector Legal, Hangu CNIC # 17301-3346174-1 Cell # 0308-5976656