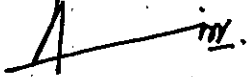


FORM OF ORDER SHEET

Court of _____

Appeal No. 1314/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/06/2023	<p>The appeal of Mr. Suleman Khan presented today by Mr. Umar Farooq Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 16-06-2023</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL No. 1314 /2023

SULMAN KHAN VS HOME & TRIBAL AFFAIRS DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with Affidavit	1-3
2.	Posting order	A	4
3.	Copy of inquiry report	B	5-11
4.	Copies of Show Cause Notice, and Reply	C & D	12-13
5.	Copy of the Impugned order dated 12-01-2023	E	14
6.	Copy of departmental appeal	G	15-16
7.	Copy of Appellate Order dated 08-05-2023	H	17-18
8.	Vakalatnama	

APPELLANT

THROUGH:

UMAR FAROOQ MOHMAND
ADVOCATE HIGH COURT

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1314 /2023

Mr. Sulman Khan, Assistant Public Prosecutor, BPS, 17, District Kohat.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa, through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Prosecution Department, Peshawar.

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUNGNEED ORDER DATED 12-01-2023 WHEREBY MINOR PENALTY OF CENSURE HAS BEEN IMPOSED UPON THE APPELLANT AND AGAINST THE APPELLATE ORDER DATED 08-5-2023 COMMUNICATED ON 23-05-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS.

PRAYER:

That on acceptance of this appeal the impugned order dated 12-01-2023 and appellate order dated 18-05-2023 communicated on 23-05-2023 as well as penalty of censure imposed upon the appellant may please be set aside. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant is serving the respondent department quite efficiently and to the entire satisfaction of his high ups.
- 2- That the appellant while serving as Assistant Public Prosecutor (BPS-17) at District Court Peshawar and performing his duties in different courts and posted in the court of Mr. Naveed ur Rehman ADJ-II to work as additional prosecutor to help the permanent posted APP in the said court due to burden of work, vide order dated 14-11-2021. Copies of orders are attached as Annexure..... **A.**

- 3- That the appellant while performing his duties the respondents issued statement of allegations to the appellant and a regular inquiry has been conducted by the respondents against the appellant and the inquiry officer/committee submitted their inquiry report. Copy of inquiry report is attached as Annexure **B.**
- 4- That finally Show Cause notice has been issued to the appellant whereby the appellant reply to the allegation mentioned in the show cause notice and denied all baseless allegations. Copies of Show Cause Notice, and Reply are attached as Annexure **C & D.**
- 5- That the appellant quite hopeful being innocent and devoted civil servant to be exonerated from the allegations but astonishingly the respondent department issued the impugned order dated 12-01-2023 whereby minor penalty of censure has been imposed upon the appellant without fulfilling all the codal formalities. Copy of the Impugned order dated 12-01-2023 is attached as Annexure **E.**
- 6- That the appellant feeling aggrieved from the impugned order filed departmental appeal but the same has been rejected on no good grounds through appellate order dated 08-05-2023. Copies of the Departmental Appeal and Appellate Order dated 08-05-2023 are attached as Annexure. **F & G.**
- 7- That appellant, having no other remedy, prefer the instant Service Appeal on the following grounds amongst the others.

GROUND:

- A- That the action of the respondents by issuing the impugned order dated 12.01.2023 and appellate order dated 08.05.2023 whereby penalty of censure has been imposed upon the appellant are against the law, facts, norms of natural justice and materials on the record, hence not tenable in the eye of law therefore are liable to be set aside.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That no right of and personal defense was given to the appellant.
- D- That the inquiry officers did not collect any sort of record/document to substantiate the allegation against the appellant during the departmental proceeding.
- E- That the enquiry officer has not recorded any statement of the appellant before imposing penalty of Censure imposed upon the appellant.

3

- F- That it is important to mention here that the appellant was deputed in the said court as Additional Public Prosecutor just to help the permanent posted APP and it was the responsibility of the concerned App to verify the data before sending the same to the concerned authority.
- G- That the inquiry committee after conducting regular inquiry has given favorable recommendation wherein about the allegation inquiry committee has concluded that alleged lapse could not be attributed only to the appellant because there is no mechanism or any notified channel for data transmission and compilation.
- H- That the respondents acted in arbitrary and mala fide manner while issuing the impugned order dated 12.01.2023 and appellate order dated 08.05.2023.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 14/6/2023

APPELLANT

Sul
SULMAN KHAN APP

THOROUGH:

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

KAMRAN KHAN *KR*

WALEED ADNAN *WAD*

UMAR FAROOQ MOMAND

MUHAMMAD AYUB *MA*

**&
KHANZAD GUL** *KG*

ADVOCATES

AFFIDAVIT

I, Sulman Khan, APP District Kohat, , do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Sul
Deponent

'B', S



A. BRIEF BACKGROUND:

The undersigned have been appointed as members of the enquiry committee to conduct enquiry against the accused officers M/s Muhammad Imran, Suleman Khan and Huma Danial Murad, Assistant Public Prosecutors (BPS-17), Peshawar to probe the allegations contained in the charge sheets / statement of allegations under the Khyber Pakhtunkhwa Government servants (Efficiency & Discipline) Rules, 2011. The allegations stated that the performance reports of the accused officers were cross checked / tallied with the concerned court's data for the month of November and December 2021 and it was found that they had furnished wrong/fake and concocted data to the Directorate of Prosecution and as such they are guilty of inefficiency and misconduct within the ambit of Rule 3 (a &b) of the Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011 (Flag-A). Furthermore, later in the proceedings, it was pointed out that a fact finding enquiry had already been conducted wherein the allegations were proved and along with other recommendations it was recommended that the delinquent officers be served charge sheets or transferred from Peshawar. Hence the instant enquiry has been framed.

B. PROCEEDINGS:

On receipt of the notification, the aforementioned accused officers were summoned to appear for personal hearing and submit written statement (Flag-B). The Director General Prosecution was requested to nominate a well conversant Departmental representative to attend / assist the enquiry committee in the proceedings. Hence Mr. Zeeshan Ullah Afridi, Deputy Director (R & A), was nominated as Departmental representative therefor (Flag-C). The District

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and Sessions Judge Peshawar was requested for provision of the required data so that the allegations could be probed (Flag-D). The District and Sessions Judge Peshawar provided the data/ details of the cases for the month of November and December 2021 which were received on 15th July 2022 (Flag-E).

During the proceedings, it appeared that some statements of the accused officers seemed relevant to be investigated from the District Public Prosecutor Peshawar and Ms. Naheed Fazal, Special Prosecutor, JMJC-IX Peshawar, hence they were also called for clearance and submission of written statement (Flag-F).

Abstracts from the various statements may be perused as follows:

1. Mr. Muhammad Imran stated that he could not submit data for the month of November 2021 due to his engagement in other courts on the verbal direction of District Public Prosecutor. The data was submitted later on 25th January 2022 but the same has been reflected as zero in all the columns. He further stated that the data for December was duly checked with court register and submitted to the District Office. He added that there is no system in place for record keeping. He further stated that a Special Prosecutor has been deputed in the same court but no work distribution exists between the two (Flag-G).

The enquiry committee observed that Mr. Muhammad Imran data for the month of November 2021 was reflected as zero in all columns and for the month of December, variations were noticed in the data submitted by the accused officer, the court data and data compiled by the District Public

(7)
(09)

Prosecutor, showing that no record keeping or checking is in practice at both the levels.

2. Ms Huma Daniel Murad stated that she provided the same data as received from the court. She added that there is no proper laid down procedure or notified mechanism whereby the court Muharrer could be bound for provision of data. The only way is to request the Muharrer for data and the same is forwarded to the District Office. Moreover, due to delays in decision write up by the court, frequent variations are unavoidable. The Naib Court does not have any register nor any copy of the judgment is shared with prosecutor (Flag-H).

While comparing the data, the enquiry committee noticed that very slight variations existed in the data provided by her to the District Office and the corresponding court figures. However, due to lack of comprehension and filling of the prescribed proforma, the figures were wrongly recorded against the corresponding columns at the District Office.

3. Mr. Suleman, Assistant Public Prosecutor, stated that he was attached with Huma Daniel Murad as additional assistant prosecutor. He added that none of the documents bear his signatures for which he could be accounted for (Flag-I).

The enquiry committee noticed that the data submitted did not bear his signature, nor there were any distribution of work or ToR/ JDs wherein he could be made accountable.

4. Ms Naheed Fazal, Special Public Prosecutor attached with the court of JMIC-IX stated that she was deputed at the aforementioned court to assist the Assistant Public Prosecutor and was not authorized or tasked to submit data to the district office (Flag-J).

9
B. Z. e. w.

5 The District Public Prosecutor stated that submission of data is the responsibility of the concerned Assistant Public Prosecutor, and the staff deputed for the purpose. He added that data received from the Assistant Public Prosecutor is compiled by Superintendent and Assistant Director (IT) and then processed for onward submission to the Director General Prosecution. He further stated that transfers / reshuffling of the Public Prosecutors are made on need basis (Flag-K).

The enquiry committee noticed that there is no proper record handling and maintenance at the prosecutor as well as at the District level. Furthermore no distribution of work exists among the Assistant Public Prosecutors deputed in the court. Moreover no correspondence has been made with courts for formal receipt of authentic data. Frequent transfers and verbal deputation is also common.

C FINDINGS:

After perusal of the record and personal hearing of the accused and associated officers, the following facts surfaced;

1. Proper registers for maintaining Official record are not maintained by the Public Prosecutors of each Court rather they are dependent upon the information of the Muharrir of the concerned Court. The data received from courts is not formal and cannot be considered authentic.
2. No efforts have been made to channelize the receipt of information from the courts and maintain / monitor the same by the Assistant Public Prosecutor or the District Public Prosecutor.

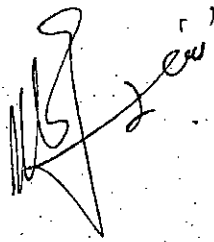
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3. Frequent transfer postings/ attachment with the courts are made by the District Public Prosecutor without following the tenure policy which affects the performance of the Public Prosecutors. Moreover, verbal deputations are also in practice that affect their performance.
4. Naib Court is attached with each Prosecutor; however his role and services are not utilized properly for handing of cases and maintaining their proper record.
5. No mechanism of Monitoring or check for cross verification of the Assistant Public Prosecutors record is in place at the District Public Prosecutor level, nor proper record maintained at the District Office too.
6. When more than one Public Prosecutor are attached to a court, there is no division of responsibilities or job description between them.

C. CONCLUSION AND RECOMMENDATIONS:

1. Variations were noticed in the data / information provided by the accused Assistant Public Prosecutors, court data and data compiled at the District Public Prosecutor office but these could not be attributed solely to the accused Assistant Public Prosecutors as there is no mechanism or notified channel to bound the officers/ officials associated with data receipt, transmission and compilation. Moreover, since no financial loss to the Public exchequer had been incurred nor the data variation has resulted in some grievous loss to the public interest, therefore the accused may be warned for their negligence and issued minor penalty of "Censure" under the Efficiency and Discipline Rules 2011.



2. The tenure policy may be followed in posting transfers /attached with the courts of the Public Prosecutors as per policy in vogue in other Departments.



3. A proper mechanism may be developed in coordination with District and sessions Judge so that formal and authentic data is solicited and shared with the Public Prosecutors, maintained at the Public Prosecutor and Deputy Public Prosecutor level and further processed for submission to Director General Prosecution.

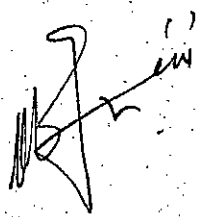
4 That Prosecutor attached with the Court may maintain registers of all cases pending in the Court including details of all the cases interested to Court for adjudications, Bail Petitions, miscellaneous matters and all disposals of cases pertaining to criminal nature.

5. The Naib Court being Muharrir of Public Prosecutor should be made responsible to collect information, update registers and also inform the concerned Prosecutor on daily basis.

6. That District Public Prosecutor may be bound to re-check/ verify the information prior to its submission to the Directorate of Prosecution.

7. That District Public Prosecutor may be bound to monitor the Registers of each Court on fortnightly or monthly basis and necessary directions may be issued for its improvement.

8. That all the directions issued by the District Public Prosecutor must be in writing, duly signed and oral directions may be discouraged.



11

9. When more than one Public Prosecutors are attached to a court, there may be division of responsibility or job description between them.

33



Mian Aziz Ahmad
Director Monitoring
Directorate General Prosecution

20/7/2022



Malik Manzoor Ahmad
Inquiry Officer / Deputy Secretary
Energy and Power Department

SHOW CAUSE NOTICE

12

I, Dr. Shahzad Khan Bangash, Chief Secretary, Khyber Pakhtunkhwa, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby advise you, Mr. Suleman Khan, Assistant Public Prosecutor (HS-17), Peshawar, as follows:

- 1 (i) that consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing by the inquiry officer, and
- (ii) on going through the findings and recommendation of the inquiry officer, the material on record and other connected papers, including your defense before the inquiry officer,

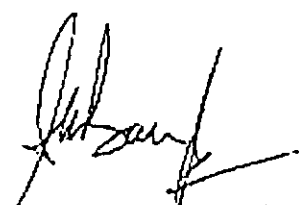
I am satisfied that you have committed the following acts/omissions specified in Rule 3 (a & b) of the said rules.

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of Censure under rule 4 of the said rules.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

5. A copy of findings of the inquiry officer/inquiry committee is enclosed.


(Dr. Shahzad Khan Bangash)
CHIEF SECRETARY
KHYBER PAKHTUNKHWA.

D=No=670
Date=12/09/2022

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Dum g
12/9
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PDC (IT)
DD

To

The Worthy Director General,
Prosecution, Khyber Pakhtunkhwa
Peshawar.

Through: District Public Prosecutor Peshawar.


SUBJECT: REPLY TO SHOW CAUSE NOTICE.

Dear Sir,

With great reverence it is humbly submitted that I have not committed any omission, commission or mis conduct. The concerned APP attached in the court of ASJ-II/ Model Court had provided the relevant data to the Directorate of Prosecution through District Public Prosecutor office Peshawar, in fact neither I have prepared the said data nor forwarded the same to the DPP office neither I have signed the same. The concerned APP had not consulted with me prior to sending the said data to quarter concern nor the same was presented to me for perusal (Copy attached).


It is pertinent to mentioned here that District Public Prosecutor Peshawar deputed me as Additional Prosecutor in the court of ASJ-II/Model Court to help her in case of any burden of work and it was the duty of concerned Prosecutor to verify the data before sending it to the quarter concerned.

So in light of the above it is humbly requested that as discussed above neither I have prepared/send/signed the relevant data nor the same was presented to me by the concern officer for perusal, hence the Show Cause Notice may please be filed without any further action/proceedings, please.


Suleman Khan
Assistant Public Prosecutor,
Peshawar.

Copy forwarded to:

- PA to Worthy Director General Prosecution.
- SO Prosecution Home & Tribal Affairs Department, Peshawar.
- The Regional Director Prosecution, Peshawar Division.
- The District Public Prosecutor, Peshawar.
- Office record.


Assistant Public Prosecutor,
Peshawar.



~~Assistant - II~~ E (14)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT**

Dated Peshawar, the 12th January, 2023

ORDER

No. SO(Pros)/HD/1-31/Inq:/03 APPs/2022: **WHEREAS**, Mr. Suleman Khan, Assistant Public Prosecutor (BPS-17), Peshawar was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the show cause notice.

WHEREAS, the competent authority (Chief Secretary, Khyber Pakhtunkhwa) granted him an opportunity of personal hearing as provided for under the Rules.

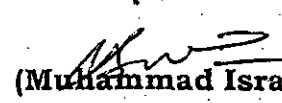
NOW, THEREFORE, the competent authority (Chief Secretary, Khyber Pakhtunkhwa) after having considered the charges, evidence on record, the explanation of the accused officer and affording an opportunity of personal hearing to the accused officer, findings of the inquiry committee and exercising his powers under rule-3 read with Rule-14(5)(ii) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 has been pleased to impose minor penalty of "**Censure**" upon Mr. Suleman Khan, Assistant Public Prosecutor (BPS-17), Peshawar

**Secretary to Govt. of Khyber Pakhtunkhwa
Home and Tribal Affairs Department**

Endst: No. & Date even.

Copy forwarded to:-

1. The Director General Prosecution, Khyber Pakhtunkhwa, Peshawar
2. PSO to Chief Secretary Khyber Pakhtunkhwa.
3. Officer concerned through Directorate of Prosecution.
4. PS to Secretary Home & TAs Department, Khyber Pakhtunkhwa.
5. Personal files of officers concerned.


(Muhammad Israr)
Section Officer (Prosecution)

G, 15-

To

The Honorable Chief Minister,
Khyber Pakhtunkhwa

Through

proper channel

Subject:

DEPARTMENTAL REPRESENTATION/ APPEAL VIDE
LETTER NO: SO (PROSECUTION)/HD/1-31/INQUIRY) #
APP/2022, HOME DEPT DATED 12-1-2023 WHERE BY
COMPETENT AUTHORITY ISSUED ME A CENSURE AS A
RESULT OF DEPARTMENTAL INQUIRY.

Respectfully Sir

With great reverence, it is submitted that the undersigned belongs to a respectable family and is serving as an Assistant public prosecutor BPS 17 in Directorate of Prosecution, Home Department and is currently serving as Assistant public prosecutor in district Court Kohat.

During the relevant Period/days the undersigned was deputed Additional Assistant public prosecutor with Assistant public prosecutor Huma Murad till arrival of Senior Public Prosecutor Zulfiqar Ali, vide order (Annex A).

The undersigned started working as per spirit of the order with said Assistant public prosecutor as an Additional Assistant public prosecutor. In the month of December, the undersigned was again directed by District Public Prosecutor Peshawar to work in the court of ASJ 10, as the concerned Public Prosecutor was on training, vide which the undersigned reported there and started his work there as per nature of the job.

In the month of November and December Miss. Huma Murad Assistant public prosecutor submitted monthly proforma for her assigned court without the endorsement/signature of the undersigned and sent the same to the quarter concerned without bringing the same in the knowledge of the undersigned. Copy of which is (Annex B and C).

Later on, her report was tallied by the concerned authority and some irregularity/misreporting were found in the data for the month of November and December, upon which the competent authority called comments from Huma Murad and the undersigned as well (Annex-D), upon which I submitted my detailed comments which are self-explanatory as (Annex E), upon submission of my reply as well as reply of other Officer i.e. APP a fact finding inquiry was initiated against us as (Annex F), In my comments I categorically

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mentioned that, neither I signed or prepared the data Nor I was taken into confidence in respect of Data before sending the same to the quarter concerned. Further stated that in the month of December I was deputed in another court i.e. ASJ 10 Peshawar.

Upon Submission of our reply comments, the Competent Authority initiated proper inquiry against us whereby by I again submitted my detailed reply which is (Annex- G) which is self-explanatory in respect of innocence and noninvolvement in the said matter.

Afterwards the undersigned was charged sheeted by competent authority where by undersigned was called for personal hearing before the inquiry officer whereby, I requested for my innocence and noninvolvement in the matter.

Vide order/letter No HD/1-31/hq/03 APP/2023, dated 12-31-2023 I received letter of "censure" from competent authority which is (Annex H).

Being aggrieved from the said order the undersigned through this appeal very humbly submits that,

1. The undersigned, neither prepared or signed the proforma upon which the inquiry was initiated.
2. Nor I send the same to quarter concerned.
3. That in the month of December I was deputed in another court.
4. No ill will has been committed on behalf of undersigned.

It is therefore humbly submitted that the under signed may be exonerated being innocent and not involved in the said matter which is very clear from the said available record, please.

Thank you.

Yours obediently



Suleman Khan

Assistant public prosecutor

Dated: 9 / 02 / 2023

H, (17)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT

Dated Peshawar, the 8th May, 2023

ORDER

No. SO(Pros)/HD/1-31/Inq:/03 APPs

WHEERAS, Mr. Suleman Khan,

Assistant Public Prosecutor (BPS-17), Peshawar was proceeded against, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and the competent authority (Chief Secretary Khyber Pakhtunkhwa) in exercise of the powers conferred upon him under Rule-3 read with Rule-14(5)(ii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 has imposed upon him the minor penalty of "Censure".

2. **AND WHEREAS**, Mr. Suleman Khan, Assistant Public Prosecutor (BS-17) under Rule-17(1) of the rules ibid preferred a review petition before the competent authority requesting therein for setting aside the penalty of "Censure" imposed upon him.

3. **NOW THEREFORE**, the competent authority (Chief Minister, Khyber Pakhtunkhwa) being Appellate Authority next above the competent authority in the instant case under Rule-2(1)(b) read with Rule-17(2) of the rules ibid has been pleased to "uphold the order of penalty and reject the appeal/review petition" of Mr. Suleman Khan, Assistant Public Prosecutor (BPS-17), Peshawar having no solid reason for his exoneration.

Secretary to Govt. of Khyber Pakhtunkhwa
Home and Tribal Affairs Department

Endst: No. & Date even.

Copy forwarded to:-

1. The Director General Prosecution, Khyber Pakhtunkhwa, Peshawar
2. PSO to Chief Secretary Khyber Pakhtunkhwa.
3. Officer concerned through Directorate of Prosecution.
4. PS to Secretary Home & TAs Department, Khyber Pakhtunkhwa.
5. Personal files of officers concerned.

Seen and handed over to Mr Suleman Khan

(Muhammad Israr)
Section Officer (Prosecution)

09/05/2023
9/5/2023
DDA/DPD
3827
09/05/2023

9/11

23/5/2023



**DIRECTORATE OF PROSECUTION
GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT**

No. DDC/ complaint / 66182
Dated Peshawar the 12 / 05 / 2023

Office Landline#091-9212559

dg.prosecution@kp.gov.pk

<https://prosecution.kp.gov.pk/>

<https://www.facebook.com/kpprosecution>

<https://twitter.com/kpprosecution>

To

The District Public Prosecutor,
Kohat,

Attention: Mr. Suleman Khan (APP)

Subject: **ORDER NO. SO (PROS)/HD/1-31/Inq:/03APPs.**

Respected sir,

I am directed to the subject noted above and to enclose herewith the order No. SO (PROS)/HD/1-31/Inq:/03APPs dated: 08-05-2023 received to this Directorate from Section Officer (Prosecution) and to state that to serve the same upon Mr. Suleman Khan (APP) for perusai and further necessary action, please.

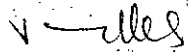
Yours Sincerely,


(Deputy Director Complaint)

Encl: as above

Copy forwarded for information to:-

- PA to Director General Prosecution Khyber Pakhtunkhwa.


(Deputy Director Complaint)

VAKALATNAMA

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

_____ OF 2023

Sulaman Khan

(APPELLANT) ✓
(PLAINTIFF)
(PETITIONER)

VERSUS

Home Dept

(RESPONDENT)
(DEFENDANT)

I/We PI Sulaman Khan

Do hereby appoint and constitute **UMAR FAROOQ MOHMAND, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 14 / 6 / 2023

Sulami

CLIENT

Umar Farooq Mohmand

ACCEPTED
UMAR FAROOQ MOHMAND
ADVOCATE HIGH COURT

OFFICE:

Office TF 291-292, 3rd Floor,
Deans Trade Centre, Peshawar Cantt:
Mobile No.0345-9383141