


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No. 1380/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	20/06/2023	<p>The appeal of Mr. Sadiq ur Rehman presented today by Syed Muddasir Pirzada Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 1380 2023

Sadiq ur Rehman( Ex-Police Constable Belt No 485)District Police Line Kohat.

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

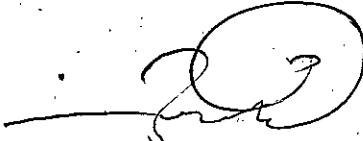
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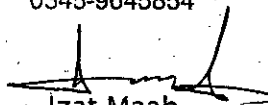
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	WakaltNama		

  
Appellant

Through

Date 30 / 06 / 2023

  
Syed Mudasir Pirzada  
Advocate P H C  
0345-9645854

  
Izat Maab  
Advocate P H C  
0335-9612888

①

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

1380/2023

Sadiq ur Rehman( Ex-Police Constable Belt No.485)District Police Line Kohat.

(Appellant).

VERSUS

1. INSPECTOR GENERAL POLICE KPK PESHAWAR.
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3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 18-01-2023 VIDE-OB 41 IN WHICH THE RESPONDENT NO:-3 WITHOUT ANY COGENT REASON BLESS MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE APPELLANT PREFER REPRESANTION ON DATED 06-02-2023 WHICH WAS TOO REJECTED ON 12-05-2023 RECEIVED ON 14-06-23.

Pray:

In view of above submission it is requested, by accepting of instant appeal the impugned order of Respondent No-3 may please be set aside and reinstate the appellant with all back benefits of absence period which was not deliberate on the basis that the appellant was serving and respondent for no reason dismissed.

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:-

Facts:

Briefly facts as per impugned order that appellant constable while posted at police lines kohat allotted SMG rifle bearing NO. 48000989 original foreign made [CHINA RIFLE] from kot of police station jungle khel for official duty ON 08.10.2022 he has deposited the weapon in kot and inspected by SI Nadeem Khan Armourer the rifle was found totally changed and deposited Pak made thus committed misappropriation and due to the above allegation the appellant was awarded major punishment of dismissal from service with immediate effect (Copy of impugned order is annexed as annexure A)

1:-That the appellant was enrolled an constable in the year 2009 and Since his enrollment the appellant has served the police department with sincerity and efficiently.

2; That during his services the appellant has always served on merit and kept his departmental interests is above his personal interests and upon above score his respectable senior officers always posed confidence in him and the appellant never damaged/injured their confidence.The appellant never provided opportunity for lodging /preferring complaint against the appellant.

3; That while serving in the police lines Kohat the appellant was served upon statement of allegation where in at police lines kohat was allotted SMG bearing NO.48000989, original Foreign made CHINA RIFLE from kot of police station jungle khel for official duty. ON.08.10.2022 the appellant deposited the wepon in kot and Inspection by SI Nadeem Khan Armorer ,The appellant have changed the weapon and deposited PAK made. Thus committed misappropriation (Copy of charge sheet etc with reply is annexed as annexure B)

4; That the appellant accordingly submitted reply to the charged sheet wherein he denied the charge leveled against him and also denied the allegation of MISAPPROPRIATION.

5; That unfortunately, the points, raised by the appellant in his reply were ignored and by conducting one sided enquiry, the enquiry proceedings were completed.

6; That before announcement of the punishment order, final show cause notice was served upon the appellant wherein again same allegation was leveled against him. The appellant again submitted a detailed and elaborate reply. (Copy of Final show cause notice and reply is annexed as annexure C)

7; That again the important points, pointed out by appellant but in vain and were badly ignored and the respondent department and awarded him punishment of dismissal from service with immediate effect

8; That since the punishment order is not in accordance with facts and law, therefore the appellant has legal and factual reservations upon the impugned order and prefer departmental representation before respondent No-2 which was too rejected (Copy of representation along with rejection order is annexed as annexure D)

9; That the appellant submits following grounds relating to the instant service appeal for kind and sympathetic conduction inter alia.

**GROUND OF APPEAL:-**

A; That the impugned order of punishment dated: 18.01.2023 is not in accordance with law, facts and evidence on record, hence it deserves to be set aside.

B; That the very statement of allegation and charge sheet were not correct because Farhan Khan LHC, Uzair Muharar now ASI, Farman Constable and Nadeem Khan SI Armorer were not made party which was very necessary for arriving at the just and fair conclusion .

C; That one sided enquiry, only against the appellant was initiated which ended in an unjustified and un lawful punishment a mounting to miscarriage of justice to the appellant.

D; That if charge sheet dated 27.10.2022 and final show cause Notice dated 28.11.2022 are perused, it will reveal that both are copies of each other. Final show cause notice is usually served after the conclusion on enquiry, therefore it should contain the facts having surfaced during enquiry so that defaulter official should prepare his defence but surprisingly there is no difference between the two which is not appealing to a prudent mind and thus from this fact it is established that from the very beginning it was decided to punish the appellant at any cost. In view of the matter, no punishment can be awarded on the basis or such an illegal, irregular and whimsical enquiry.

E:That from the final show cause notice it appears that enquiry was taken/ treated formally and no consideration was paid on legal and factual grounds thus the enquiry no punishment can be awarded on such illegal and irregular enquiry.

F:That for just decision of the enquiry, the appellant suggested in reply to the charge sheet that LHC Farukh, Uzair Muharrar now ASI, Nadeem Khan Si Armorer may also be included in the enquiry but no action was taken towards this facts and appellant was made an Escape Goat .

G:That it is established from the facts that the appellant in the month of JUNE 2022.had handed over original China made SMG Rifle in working condition to the jungle khel police station kohat.At that time Farukh LHC and Farman Constable were present who took into possession the said rifle upon direction of Uzair muharrar who is now ASI for inspection.

H:That it was incumbent upon the muharrar staff to have inspected/ checked the said riffle there and then but no the basis of melefide intention, the appellant was told that the riffle would be inspected later on and the appellant was asked to wait the appellant being a simple person not knowing malefied intention of the Muharrar staff left police station jungle khel kohat and waited for observation of the expert on the riffle.

I:That the riffle was insepcted in the month of october 2022.In view of the matter gap between june 2022 to october 2022,is more or less five months.Results of inspection after more or less five months is highly doubtful, suspicious and untrest worthy because the concerned were having ample opportunity to substrate the original riffle with the pakistani riffle, hence the appellant cannot be blamed for such a illegality/ irregularity on the parts of the muharrar staff and Nadeem Armorer.

J:That in the charge sheet date of delivery on the riffle in question by the appellant to the Moharrar staff P.S Jungle khel has been mentioned as 08.10.2022 while date on the charge sheet while date on the charge sheet against the appellant is 27.10.2022.

K:-That If the appellant admit the dates correct, even then gap between delivery of the weapon in question and inspection is about 20 (twenty) days. These days are sufficient whereian, original riffle can be substituted successfuully Hence if version of the department is believed even then result in 20days in respect of the riffle in questions is also suspected and highly doubtful and according to police rules provided that with in 24 hours it was checked but in vain.

L:That fair play demanded , to have inspected the riffle on spot and result should have been endorsed in record on the same day in presence of the appellant but by not inspecting and exoressing opinion on the spot the Result after more or less 12 days is again highly doubtful and objectionable because substitution of the riffle is not matter of the days but it is an effect matter of minutes. Thus such a doubtful result cannot be believed and no punishment orr such a suspected opinion can be awarded.

M:That reagarding delivery of the weapon in question the appellant has a video recording but such an important pieces of evidence was ignored by the enquiry officers and as well as the worthy competent authority.

N:That during enquiry an important witness namely Nadeem Khan Sub-Inspector Armorer was not examined hence the apellant was hihgly prejudiced.

O; That no witness was examined in presence of the appellant nor was provided opportunity to cross examine the witness.

P; That with the instant enquiry question of some source of income and reputation of the appellant was involved but unfortunately the concerned have taken the instant enquiry very lightly which resulted in serious doubt and miscarriage of justice law and fair play to the appellant.

Q; That the appellant assures to the respondent through all the available means that he is absolutely innocent and he was punished for no fault on his part and important aspect was ignored that appellant was on sick leave later agitated at the time of arguments with evidence by the permission of honourable tribunal.

R; That enquiry against the appellant was conducted unilaterally and due process or law was not followed.

S; That the appellant is a law abiding official, and he cannot think to commit such illegal, unethical and highly objectionable act and the appellants service carrier is clean and he has not been punished during his more or less fourteen years service.

T; That during enquiry nothing tangible and trust worthy against the appellant was proved/ establish.

U; That Art 10 A Of the constitution of Pakistan has envisaged that it is fundamental right of the accused/defaulters that against him fair, transparent and independent proceeding should be conducted. However in case of the appellant by not following due process of Law his fundamental right has been infringed which has made the enquiry and punishment as illegal and of no legal consequence.

V; That it is made factory that along with the final show cause notice enquiry report has to be provided to the defaulter but the concerned have not delivered the enquiry report, hence such conduct smell a bad rat on part of the department.

W; That the appellant is the only source of income to his large family if such an unjustified and legally defective order of punishment is maintained it is likely to land family of the appellant in starvation and ALLAH forbid the appellant will bear irreparable loss.

X- That during so called enquiry nothing is proved against the appellant even a single shadow of doubt not attracted to the conduct of the appellant but for no good reason award impugned order which is not sustainable in eye of law.

Y:- That there are numerous good entries in the service record of the appellant which could be verified but this fact has not been taken in consideration while awarding the impugned order of punishment which is against to the canon of justice.

Z:- That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991-584.

That the appellant never ever admit before any forum regarding any admittance of alleged guilt.

Pray:


5

In the view of above circumstances It is humbly prayed that the impugned order of punishment awarded by Respondent No. 3 may graciously please be set aside for the end of justice and the appellant be reinstated in service or blessed with all back benefits of dismissal periods .

  
Appellant

Through

Date 20.16.2003

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

  
Izat Maab  
Advocate P H C

Certificate:-

Certified that no such like appeal has earlier been filed in this Hon able Service tribunal as per instruction of my client.


List of Books

- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.

Service Appeal \_\_\_\_\_ 2023

AFFIDAVIT

I, Syed Mudasir Pirzada Advocate, as per instruction of my client do here by solemnly affirm and declare that all the contents of accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

  
Advocate



(7)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Sadiq ur Rehman( Ex-Police Constable Belt No 485)District Police Line Kohat.

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

ADDRESS OF THE PARTIES

APPELLANT :-

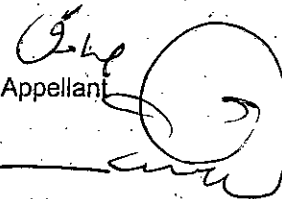
Sadiq ur Rehman( Ex-Police Constable Belt No 485)District Police Line Kohat.

RESPONDENTS

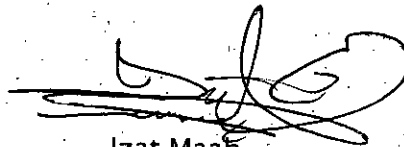
1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT.

Date 20/06/2023

Through

  
Appellant

Syed Mudasir Pirzada  
Advocate PHC  
0345-9645854



Izat Maab  
Advocate P H C

Immunized card

Annexure A

Page No. 08



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-920116 Fax 9260125

## ORDER

This order is passed on denovo departmental proceedings against Constable Sadiq Ur Rehman No. 485 under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that constable Sadiq Ur Rehman No. 425 while posted at Police Lines Kohat allotted SMG rifle bearing No. 4800989, original foreign made (China rifle) from Kot of Police station Jungle Khel for official duty On 08.10.2022, he has deposited the weapon in Kot and inspected by SI Nadeem Khan Armourer, the rifle was found totally changed and deposited Pak made, thus committed misappropriation.

In view of above charges proper departmental proceedings were initiated against the defaulter constable. SP Operations Kohat was appointed as enquiry officer. The enquiry officer after due process filed his report wherein he held the accused for commission of offense / misappropriation of Govt. property.

In order to provide an opportunity of defense and fulfill the legal formalities, Final Show Cause Notice alongwith relevant documents were served upon the accused official to which he filed reply but found unsatisfactory.

Record gone through which indicates that the accused official was associated with the enquiry proceedings afforded opportunity of defense. The accused being member of disciplined force, bad name to the department by indulging him to change the Govt. rifle. Therefore, in exercise of powers conferred upon me under the rules ibid I, Abdul Rauf Babar, District Police Officer, Kohat impose a major punishment of dismissal from service to accused Constable Sadiq Ur Rehman No. 485 with immediate effect. Kit etc be collected and report.

DISTRICT POLICE OFFICER,  
KOHAT

OB No. 41  
Date 18-01 /2023

No. 228-27 PA dated Kohat the 18-1-2023.

Copy of above to the R.I. Reader / Pay officer /SRC /OHC for necessary action.

Annexure B  
Page No- 9



No 10382-83/PA

Office of the  
District Police Officer,  
Kohat

Dated 27-10-2022

CHARGE SHEET

I, MR. SHAFI ULLAH KHAN, DISTRICT POLICE OFFICER, KOHAT, as competent authority under Khyber Pakhtunkhwa Police Rules 1975 (amendments 2014), am of the opinion that you Constable Sadiq Ur Rehman No. 485 Police Lines Kohat rendered yourself liable to be proceeded against, as you have omitted the following act/omissions within the meaning of Rule 3 of the rules ibid.

i. *That you constable Sadiq Ur Rehman No. 425 while posted at Police Lines Kohat was allotted SMG bearing No. 48000989, original foreign made (China rifle) from Kot of Police station Jungle Khel for official duty. On 08.10.2022, you have deposited the weapon in Kot and inspection by SI Nadeem Khan Armourer. You have changed the weapon and deposited Pak made. Thus committed misappropriation.*

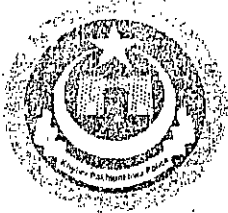
2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.

3. You are, therefore, required to submit your written statement within 07 days of the receipt of this Charge Sheet to the enquiry officer.

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 ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

  
DISTRICT POLICE OFFICER,  
KOHAT



No. 10382-83/PA

*Annexure 08*  
Page No 10

Office of the  
District Police Officer,  
Kohat

Dated 27/10/2022

**DISCIPLINARY ACTION**

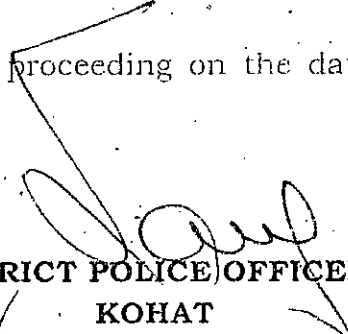
I, **MR. SHAFI ULLAH KHAN, DISTRICT POLICE OFFICER, KOHAT**, as competent authority, am of the opinion that you **Constable Sadiq Ur Rehman No. 485 Police Lines Kohat** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

**STATEMENT OF ALLEGATIONS**

- i. **That you constable Sadiq Ur Rehman No. 425 while posted at Police Lines Kohat was allotted SMG bearing No. 48000989, original foreign made (China rifle) from Kot of Police station Jungle Khel for official duty. On 08.10.2022, you have deposited the weapon in Kot and inspection by SI Nadeem Khan Armourer. You have changed the weapon and deposited Pak made. Thus committed misappropriation.**

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations Dsp City Kohat is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

  
DISTRICT POLICE OFFICER,  
KOHAT

No. 10382-83/PA, dated 27-10/2022.

Copy of above to:-

1. Dsp City Kohat :- The Enquiry Officer for proceedings against the accused under the rules ibid.
2. The **Accused official** :- with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him.

### جواب چارج شیٹ

بجوالہ چارج شیٹ نمبر 83-10382، 10382 مورخہ 27-10-2022 من مسائل پر الزام لگایا گیا ہے کہ بدروان تعیناتی پولیس لائن کوہاٹ من مسائل کو ایک سرکاری رائفل (SMG) جو کہ اصلی چائنہ میڈ تھی۔ پولیس سٹیشن جنگل خیل کی کوت من مسائل کے نام پر جاری کی گئی تھی۔ مورخہ 08-10-2022 کو من مسائل نے کوت میں مذکورہ اسلحہ داخل کیا جو کہ ندیم خان سب انسپکٹر آرمور نے پڑتال کر کے رائے دی کہ اسلحہ مذکورہ پاک میڈ ہے جو کہ غبن کے مترادف ہے۔

جناب عالی!

بجواب چارج شیٹ مذکورہ بالا معروف خدمت ہوں کہ چارج شیٹ مذکورہ غلط اور خلاف واقعات ہے کیونکہ من مسائل کی تعیناتی تھانہ جنگل خیل میں ہوئی تھی اور اسلحہ بھی جنگل خیل تھانہ کی کوت سے حاصل کیا تھا۔ بعد از بجائے اسکے کہ من مسائل کو بدروان تعیناتی پولیس لائن کوہاٹ تھانہ جنگل خیل سے اسلحہ حاصل کرنا ظاہر کیا جائے بلکہ حقیقت یہ ہے کہ بدروان تعیناتی تھانہ جنگل خیل میں تھانہ جنگل خیل کی کوت سے ہی اسلحہ جاری کیا گیا ہے۔ لہذا چارج شیٹ میں تصحیح کی ضرورت ہے۔

جناب عالی!

جہاں تک SMG رائفل چائنہ میڈ کا پاک میڈ سے تبدیل کرنے کے الزام کا تعلق ہے تو یہ الزام سراسر بے بنیاد، خلاف واقعات اور حقیقت پر مبنی نہ ہے۔ حقیقت یہ ہے کہ مورخہ 31.05.2022 کو من مسائل نے ایکسڈنٹ کیا تھا جس سے وہ پاؤں پر شدید مجروح ہوا تھا جبکہ اثرات آج بھی من مسائل کے پاؤں پر موجود ہیں اور اسکے چلنے پھرنے میں تکلیف ہوتی ہے اور بیساکھی کا سہارا لیکر چلتا پھیرتا ہے۔ من مسائل کے ساتھ کوت سے جاری بندوق موجود تھی کہ اپنی بیماری کے دوران مناسب سمجھا کہ اسکو تھانہ جنگل خیل کی کوت میں داخل کروایا جائے۔ چنانچہ من مسائل نے وسط جون 2022ء جسکی تاریخ یاد ہے تھانہ جنگل نہایت ہی تکلیف کی حالت میں گیا اور تھانہ میں مذکورہ بندوق پیش کی جسکو فرمان کانسٹیبل جو کہ اس وقت بطور امدادی محرر تھانہ جنگل خیل کام کرتا ہے کہ حوالہ کی فرمان کانسٹیبل بندوق مذکورہ محرر عزیز "IHC" کے کمرہ میں لے گیا جہاں سے فرمان کانسٹیبل کو ہدایت ملی کہ بندوق فرخ "LHC" کے حوالے برائے ملاحظہ پڑتال کی جائے۔ جو کہ فرمان کانسٹیبل نے فرخ کے حوالہ کی اور فرخ LHC نے میری امن مسائل کی اور فرمان کی موجودگی میں مذکورہ بندوق سے سارے کارٹریج نکالے اور بندوق کے تمام پزے بھی علیحدہ علیحدہ کر دیئے فرخ LHC نے بندوق مذکورہ کا نہایت ہی باریک بنچا سے ملاحظہ کیا اور بندوق کا نمبر بھی بمعہ پرزہ جات اپنے ساتھ نوٹ کیا۔

جناب عالی!

بعد از فرخ LHC نے نام پرزہ جات کو جوڑ کر بندوق مذکورہ کوت میں جمع کر دی اور اس موقع پر کسی قسم کا کوئی اعتراض نہ اٹھایا۔ فرخ LHC نے اپنی تسلی کرنے کے بعد جٹر میں سے میرے امن مسائل کے نام پر جاری شدہ بندوق مذکورہ کو کاٹ کر من مسائل کو جانے کی اجازت دیدی۔ جو کہ من مسائل میڈیکل لیو پر ہونے کی وجہ سے واپس اپنے گھر چلا گیا چارج شیٹ میں یہ بتایا گیا کہ من مسائل نے بندوق مذکورہ مورخہ 08.10.2022 کو کوت میں داخل کی۔ جبکہ اصل حقیقت یہ ہے کہ مذکورہ بندوق من مسائل نے ذاتی طور پر تکلیف کے عالم میں ہونے کی باوجود تھانہ جنگل خیل کی کوت میں وسط جون 2022ء کو کوت میں داخل کی تھی۔ بندوق مذکورہ مورخہ 08.10.2022 کو داخل کرنے کی اطلاع غلط اور حقیقت پر مبنی نہ ہے۔ جسکی تصدیق اور تصحیح کرنیکی ضرورت ہے تاکہ من مسائل کے ساتھ انصاف ہو سکے۔

جناب عالی!

نہیں ٹھہرایا گیا۔ من سائل پولیس جیسے باعزت ادارے کا رکن ہونے اور اپنی شہرت اور خاندانی پس منظر کو مد نظر رکھتے ہوئے تبدیلی بندوق جیسے غیر قانونی و غیر اخلاقی اور اس قسم کے کبھی فعل کا سوچ بھی نہیں سکتا۔

جناب عالی!

چارج شیٹ کے مندرجات سے یہ ظاہر ہوتا ہے کہ کسی بدخواہ نے من سائل کو پھنسانے اور اسے نقصان پہنچانے کی کوشش کی ہے۔ اگر اس الزام میں کوئی حقیقت ہوتی تو من سائل کے خلاف تبدیلی بندوق کا الزام فوری طور پر لگادیا جاتا۔ لیکن اگر من سائل کی بندوق کورت میں داخل کرنے کی تاریخ سے اگر حساب لگایا جائے تو معلوم ہوگا کہ اس دوران کم و بیش پانچ مہینے گزر چکے ہیں۔ اور اگر چارج شیٹ میں دی گئی تاریخ مورخہ 08.10.2022 سے حساب لگایا جائے تو اس رپورٹ میں کم و بیش 19 دن کی دیر کی گئی ہے۔ جسکے دوران من سائل کے خلاف بد نیتی کے عنصر کو رد نہیں کیا جاسکتا۔

جناب عالی!

من سائل نا کردہ گناہ ہے۔ مذکورہ بندوق اس نے تبدیل نہیں کی ہے۔ اور من سائل کے خلاف بے بنیاد اور من گھرت الزام لگایا گیا ہے۔ اگر اس الزام میں ذرہ برابر بھی حقیقت ہوتی تو نہ صرف محکمانہ کارروائی بلکہ من سائل کے خلاف فوجداری کارروائی بھی عمل میں لائی جاتی۔ من سائل کے خلاف کارروائی عمل میں نہ لانا اس بات کا غماز ہے کہ من سائل کے خلاف بے بنیاد گھڑا گیا ہے جسکی تہ میں پہنچنا ضروری ہے۔ اس سلسلے میں من سائل نہایت ہی ادب سے عرض خدمت ہے کہ فرخ LHC، فرمان کانشیبل اس وقت کا عمر عزیز جو کہ بھی ASI ہے اور سبیل جی کی کا انچارج ہے کو بھی محکمانہ کارروائی میں شامل کیا جائے تاہو دودھ اور پانی کا پائیا ہو سکے۔ اور یہ بھی معلوم کیا جائے کہ مذکورہ افراد کا اس واقع میں کتنا کردار ہے اور من سائل کی بے گناہی بھی طشت از بام ہو سکے۔

جناب عالی!

من سائل ایک دفع پھر یقین دہانی کراتا ہے کہ وہ اس واقع میں بالکل بے گناہ ہے اور اسکو تبدیلی بندوق کے الزام میں ناجائز طور پر موجود الزام ٹھہرا کر محکمانہ کارروائی کا آغاز کیا گیا ہے۔ چارج شیٹ میں من سائل کے خلاف تبدیلی بندوق کا الزام خلاف واقعات و خلاف حقیقت ہے۔ من سائل کا اس واقع میں بلواسطہ یا بلاواسطہ کوئی کردار نہ ہے۔ من سائل اپنی بے گناہی کو ثابت کرنے کیلئے محکمہ کے ساتھ ہر قسم کے تعاون کیلئے تیار ہے اور افسران صاحبان سے بھی امید و اتق ہے کہ وہ قانون اور انصاف، وغیرہ جانبداری و شفافیت سے کام لیتے ہوئے انصاف کے مطابق فیصلہ کریں گے۔ من سائل کے خلاف الزامات حقیقت پر مبنی نہ ہونے کی وجہ سے من سائل کے خلاف چارج شیٹ ہذا ابلا مزید کارروائی داخل دفتر کئے جانے کا حکم صادر فرمایا جائے۔ من سائل آپ صاحبان کی صحت اور بلندی اقبال کیلئے دعا کرتا رہے گا۔

الرقوم: 04.11.2022

آپ کا تابع دار صادق الرحمان کانشیبل نمبر 485

پولیس لائن کوہاٹ

Annexure C  
Page No 13



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-920116 Fax 920125

No. 103876 /PA dated Kohat the 28/11 /2022

**FINAL SHOW CAUSE NOTICE**

1. I, **Mr. Shafi Ullah Khan, District Police Officer, Kohat** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, **Constable Sadiq Ur Rehman No. 485** as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 10382-83/PA dated 27.10.2022.
- ii. On going, through the finding and recommendations 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 section 3 of the said ordinance.

- a. ***That you constable Sadiq Ur Rehman No. 425 while posted at Police Lines Kohat was allotted SMG bearing No. 48000989, original foreign made (China rifle) from Kot of Police station Jungle Khel for official duty. On 08.10.2022, you have deposited the weapon in Kot and inspection by SI Nadeem Khan Armourer. You have changed the weapon and deposited Pak made. Thus committed misappropriation.***

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules **ibid**.

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

4. If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

5. The copy of the finding of inquiry officer is enclosed.

**DISTRICT POLICE OFFICER,  
KOHAT**

جناب عالی!

بحوالہ آخری نوٹس اظہار وجوہ نمبر PA/10816 مورخہ 28.11.2022 موصولہ 06.12.2022 من سائل کے بارے میں مجاز اتھارٹی نے قرار دیا ہے کہ:

- ا۔ آپ کے خلاف قائم کی گئی انکوائری جس میں آپ کو ساعت کا موقع دیا گیا انکوائری آفس نے اپنی رپورٹ سمجھ ریکارڈز پر دستخطی کو بھیج دیا ہے۔ مذکورہ رپورٹ اور ریکارڈز کے ملاحظے کے بعد اس نتیجے پر پہنچا ہوں کہ آپ نے ذیل عمل اعلیٰ کار تکاب دفعہ 3 مذکورہ بالا آرڈر میں کی روشنی میں کیا ہے۔
- الف: بدوران تعیناتی پولیس لائسنز کو ہاٹ آپ کو ایک سرکاری رائلٹل (ایس ایم جی) جو کہ اعلیٰ چائنہ میڈیٹی۔ پولیس اسٹیشن جنگل خیل کی کورٹ سے آپ کو جاری کی گئی تھی۔ مورخہ 08.10.2022 کو آپ نے کورٹ میں مذکورہ اسٹوڈنٹ داخل کیا جو کہ ندیم خان سب انسپکٹر آرمور۔ پرنسپل اکر کے رائے دی کہ اسٹوڈنٹ مذکورہ پاک میڈ ہے۔ لہذا آپ نے ٹین کار تکاب کیا ہے۔

جناب عالی!

بحوالہ آخری نوٹس اظہار وجوہ نہایت مؤدبانہ معروض خدمت ہوں کہ من سائل قبل ازیں چارج شیٹ کا جواب مورخہ 04.11.2022 کو انکوائری آفس کے ہاں بدوران انکوائری داخل کر چکا ہوں۔ چونکہ موجودہ آخری نوٹس اظہار وجوہ اور چارج شیٹ مورخہ 27.10.2022 میں کوئی فرق نہ ہے۔ اور دونوں کا ایک دوسرے کی نقل میں لہذا آخری نوٹس اظہار وجوہ ہذا کا جواب بھی من سائل کا تصور ہوئے۔ البتہ اس ضمن میں من سائل چند وضاحتی نکات بیان کرنا ضروری تصور کرتا ہوں جو کہ ذیل ہیں۔

ا۔ یہ کہ موجودہ آخری نوٹس اظہار وجوہ اور چارج شیٹ مورخہ 27.11.2022 میں کوئی فرق نہیں ہے بلکہ موجودہ آخری نوٹس اظہار وجوہ سابقہ چارج شیٹ مذکورہ کی کاپی معلوم ہوتا ہے۔

چاہئے تو یہ تھا کہ انکوائری کی کارروائی گزر جانے کے بعد انکوائری میں سامنے آنے والے نکات و شواہد کا ذکر کیا جاتا لیکن آخری نوٹس اظہار وجوہ میں اس قسم کی کسی چیز کا ذکر نہ ہے جو کہ انصاف کے تقاضوں کے مطابق نہ ہے۔ کیونکہ من سائل کو سامنے آنے والے شواہد کے بارے میں کوئی معلومات نہیں دی گئیں۔ اس وجہ سے من سائل کو اپنے دفاع کا موقع نہیں ملا جو کہ دفاع کا حق ہونے کے مترادف ہے۔ اور یوں من سائل کے ساتھ نا انصافی کا سلوک کیا گیا اور ان حالات میں انکوائری ہذا کا فیصلہ قانون، ضابطے اور انصاف کے مطابق نہ ہونے کا احتمال ہے۔

ii۔ یہ کہ آخری نوٹس اظہار وجوہ سے معلوم ہوتا ہے کہ انکوائری ہذا کو رسمی طور پر لیا گیا ہے اور اس کے قانونی پہلوؤں پر کوئی توجہ نہیں دی گئی ہے۔ ایسا معلوم ہوتا ہے کہ ہر ایک اٹھائے گئے نکتے کو میکینکل طور پر لیا گیا ہے اور ذہنی انصاف کی مصلحتوں کو استعمال نہیں کیا گیا ہے۔

iii۔ یہ کہ من سائل نے چارج شیٹ کے جواب میں یہ تجویز دی تھی کہ انکوائری ہذا میں فرخ LH، عزیز محمد جو کہ اب ASI اور فرمان کا شیل کو بھی فریق بنایا جائے تاکہ دو دھکا دو دھکا اور پانی کا پانی ہو سکے لیکن ایسا معلوم ہوتا ہے کہ اس نہایت ہی اہم تجویز کو نظر انداز کیا گیا ہے۔ کم از کم انکوائری آفس اس تجویز پر کچھ روشنی تو ڈالتے کہ آیا من سائل کی طرف سے پیش کردہ تجویز قابل عمل ہے یا نہیں۔ لیکن ایسا کچھ بھی نہیں کیا گیا۔ من سائل اب بھی اس تجویز کی تائید کرتا ہے کہ اگر انصاف کی تہمت پہنچانا ہے تو ان مذکورہ بالا تینوں پولیس اہلکاران کو بھی شامل انکوائری کرنا از حد ضروری ہے۔

iv۔ یہ کہ قابل غور بات یہ ہے کہ من سائل نے سرکاری بندوق بالکل درست حالت میں جون کے مہینے میں کورٹ کے حوالہ کی تھی جبکہ اس کا اس معائنہ ملاحظہ اکتوبر 2022ء کے مہینے میں کیا گیا۔ اس لحاظ سے من سائل کی طرف سے بندوق پیش کرنے اور ملاحظہ کے درمیان کا وقت کم و بیش پانچ ماہ ہے اور اگر چارج شیٹ اور آخری نوٹس اظہار وجوہ میں دی گئی تاریخ مورخہ 08.10.2022 کو من سائل نے بندوق پیش کی جبکہ من سائل پر چارج شیٹ 28.10.2022 قیام کرانی گئی تو ان دو تاریخوں کا درمیانی عرصہ تقریباً 7 دن بنتا ہے۔ اور اس دوران جبکہ من سائل موجود بھی نہ تھا بندوق کے پرزوں کی تاملی کورٹ کے اہلکاران عمل میں لاسکتے ہیں اور حقیقی طور پر اگر من سائل کی بندوق کی حواگی اور اس کے ملاحظے اور رپورٹ کا درمیانی وقفہ 24 گھنٹے کا بھی ہو تو جب بھی ملاحظہ اور رپورٹ منکوک ہو جاتی ہیں۔ یہ جاننا کہ پانچ مہینے یا 9 دن کا وقفہ۔



-v جناب عالی! اس معاملے کو ہلکانہ لیا جائے، عینا کہ اب تک لیا گیا ہے من مسائل کی اس انکوائری کیساتھ زندگی اور معاشی ذریعہ وابستہ ہے اور ساتھ ساتھ میرے خاندان کا مستقبل بھی وابستہ ہے۔ لہذا اس انکوائری کی تہہ تک پہنچنا بہت لازم ہے اور ریکی کارروائی سے اجتناب کیا جانا چاہئے۔

-vi یہ کہ من مسائل محکمہ پولیس میں کم و بیش 14 سال ملازمت کر چکا ہے اور کبھی بھی محکمانہ کارروائی کا سامنا نہ کیا ہے اور نہ ہی کوئی سزا ملی ہے۔ من مسائل اس قسم کے غیر قانونی اور قبیح فعل کا تصور بھی نہیں کر سکتا۔

-vii یہ کہ بدوران انکوائری من مسائل کو گواہان پر جرح کا موقع نہیں دیا گیا بلکہ انکوائری آفس صاحب خود ہی گواہان پر سوالات کرتے رہے جو کہ قانونی لحاظ سے ایک غلط طریقہ ہے انکوائری آفس کے بجائے قانون قصور وار ملازم کو یہ حق دینا ہے کہ وہ گواہان پر جرح کرے۔ صحیح قانونی طریقہ اختیار نہ کر کے انکوائری آفس صاحب نے من مسائل کیساتھ بہت بڑی نا انصافی کی ہے جس کی وجہ سے تمام انکوائری بمعہ حکم مجازہ حاکم قانونی طور پر ناقص ہو جاتے ہیں جن کی قانون کی نظر میں کوئی اہمیت نہیں ہوتی اور قصور وار ملازم کو اس قسم کی ناقص انکوائری کی بنیاد پر کوئی سزا نہیں دی جاسکتی۔

-viii یہ کہ آرٹیکل 10-A آئین پاکستان نے ملزم یا قصور وار ملازم کے خلاف آزادانہ اور شفاف ٹرائل انکوائری کا حکم دیا ہے اور اس حق کو ملزم یا قصور وار ملازم کا بنیاد حق تسلیم کیا ہے۔ انکوائری قانون کے مطابق نہ کر کے من مسائل کے بنیاد حق کو سلب کیا گیا ہے اور ایسی صورت من مسائل کبھی کسی کی سزا کا مستحق نہیں ٹھہرتا۔

-ix یہ کہ من مسائل بالکل بے گناہ ہے اور اس کے خلاف انکوائری ہذا بلا مزید کارروائی داخل دفتر کی جائے۔

-x یہ کہ من مسائل کے خلاف بدوران انکوائری کچھ بھی ثابت نہیں ہوا ہے۔ لہذا انکوائری ہذا داخل دفتر کرنے میں کوئی امر مانع نہیں ہے۔

-xi یہ کہ اگرچہ آخری لوٹس اظہار وجہ میں لکھا گیا ہے کہ اس لوٹس کے ساتھ ساتھ من مسائل کو انکوائری رپورٹ کی کاپی بھی حوالہ کی گئی لیکن درحقیقت من

مسائل کو کوئی انکوائری رپورٹ حوالہ نہیں ہوئی ہے۔ بلکہ صرف آخری لوٹس اظہار وجہ حوالہ کیا گیا ہے اور اس طرح ایک اہم قانونی نکتے کے خلاف ورزی کی گئی جس کی وجہ سے من مسائل کو سزا نہیں دی جاسکتی۔

-xii یہ کہ من مسائل کو آپ جناب کے روبرو پیش کئے جانے کا حکم صادر فرمایا جائے تاکہ من مسائل حوالگی اصلی بندہ روق کوت اسٹاف کی ناقابل تردید ثبوت ہائے اس موقع پر ملی گئی تصاویر کو آپ صاحب کے روبرو پیش کر سکیں۔

لہذا مؤدبانہ گزارش ہے کہ من مسائل کے خلاف نہ تو انکوائری قانون کے مطابق چلائی گئی۔ نہ ہی گواہان پر جرح کرنے کا حق دیا گیا اور نہ ہی من مسائل کے خلاف الزام ثابت ہو سکا۔ جو کہ من مسائل کو بے گناہ ٹھہرانے کیلئے کافی ٹھوس شواہدی حیثیت رکھتے ہیں اور بدینہ وجہ من مسائل کے خلاف انکوائری ہذا بلا مزید کارروائی داخل دفتر کئے جانے کا حکم صادر فرمایا اور من مسائل کو انکوائری ہذا میں بے گناہ ٹھہرایا جائے۔ من مسائل تا عمر دعا گور ہے گا۔

مورخہ: 07.12.2022

آپ کا تابعدار

کانیشیل صادق الرحمن بلٹ نمبر: 485

متعین نیو پولیس لائن

Anneamur D

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**THE DEPUTY INSPECTOR GENERAL OF POLICE  
KOHAT REGION KOHAT .**

**Departmental Appeal Under Rule-II of The Police Rule  
1975 (Amended 2014) Against Order of The District  
Police Officers Kohat Dated:18-01-2023 Vide Which The  
Appellant Was Dismissed From Service with Immediate  
Effect Without Any Lawful Justification.**

Respected Sir,

With great respect and veneration appellant may kindly be allowed to submit the following for your kind and sympathetic consideration.

1. That the appellant was enrolled an constable in the year 2009.
2. That Since his enrollment, the appellant has served the police department with sincerity and efficiently.
3. That during his services the appellant has always served on merit and kept his departmental interests is above his personal interests.
4. That his respectable senior officers always posed confidence in him and the appellant never damaged/injured their confidence. The appellant never provided opportunity for lodging ./ preferring complaint against the appellant.
5. That while serving in the police lines kohat the appellant was served upon statement of allegation wherein it at police lines kohat was allotted SMG bearing No.48000989, original Foreign made **CHINA RIFLE** from kot of police station jungle khel for official duty. On 08.10.2022 the appellant deposited the weapon in Kot and Inspection by SI Nadeem Khan Armorer ,The appellant have changed the weapon and deposited PAK made. Thus committed, misappropriation. *(Copy of the statement of allegation is enclosed).*
6. That the appellant accordingly submitted reply to the charged sheet wherein he denied the charge leveled against him and also denied the allegation of "**Misappropriation**". *(Copy of reply to the change sheet is enclosed).*

7. That unfortunately, the points, raised by the appellant in his reply were ignored and by conducting one sided enquiry, the enquiry proceedings were completed.
8. That before announcement of the punishment order, final show cause notice was served upon the appellant wherein again same allegation was leveled against him. The appellant again submitted a detailed and elaborate reply. *(Copies of both the final show cause notice and reply are enclosed).*
9. That again the important points, pointed out by the complainant were badly ignored and the competent authority awarded him punishment of dismissal from service with immediate effect. *(Copy of the impugned order is enclosed).*
10. That since the punishment order is not in accordance with facts and law, therefore the appellant has legal and factual reservations upon the impugned order.
11. That the appellant submits following grounds relating to the instant appeal for you kind and sympathetic conduction.

**Grounds of Appeal:-**

- A. That the impugned order of punishment dated: 18.01.2023 is not in accordance with law, facts and evidence on record, hence it deserves to be set aside.
- B. That the very statement of allegation and charge sheet were not correct because Farhan Khan LHC, Uzair Muharar now ASI, Farman Constable and Nadeem Khan SI Armorer were not made party which was very necessary for arriving at the just and fair conclusion.
- C. That one sided enquiry, only against the appellant was initiated which ended in an unjustified and un lawful punishment amounting to miscarriage of justice to the appellant.
- D. That if charge sheet dated 27/10/2022 and final show cause Notice dated 28/11/2022 are perused, it will reveal that both are copies of each other. Final show cause notice is usually served after the conclusion on enquiry, therefore it should contain the facts having surfaced during enquiry so that defaulter official should prepare his defense but surprisingly there is no difference between the two which is not appealing to a prudent mind and thus from this fact it is established that from the very beginning it was decided to punish the appellant at any cost. In view of the matter, no

punishment can be awarded on the basis of such an illegal, irregular and whimsical enquiry.

- E. From the final show cause notice it appears that enquiry was taken / treated formally and no consideration was paid on legal and factual grounds thus the enquiry no punishment can be awarded on such an illegal and irregular enquiry.
- F. That for just decision of the enquiry, the appellant suggested in reply to the charge sheet that LHC Farukh, Uzair Muharar now ASI, Nadeem Khan SI Armorer may also be included in the enquiry but no action was taken towards this facts and appellant was made an Escape Goat .
- G. That it is established from the fact that the appellant in the month of JUNE 2022 had handed over original China made SMG Rifle in working condition to the Jungle Khel Police Station Kohat. At that time Farukh LHC and Farman Constable were present who took into possession the said rifle upon direction of Uzair muharar who is now ASI for inspection.
- H. That it was incumbent upon the muharar Staff to have inspected / checked the said riffle **there and then** but on the basis of malefide intention, the appellant was told that the riffle would be inspected later on and the appellant was asked to wait the appellant being a simple person not knowing malefide intention of the Muharar staff left police station jugle khel kohat and waited for observation of the expert on the riffle.
- ✓ I. That the riffle was inspected in the month of October 2022: In view of the matter gap between June 2022 to October 2022, is more or less five months. Result of inspection after more or less five months is highly doubtful , suspicions and untrest worthy because the concerned were having ample opportunity to substrate the original riffle with the Pakistani riffle , hence the appellant cannot be blamed for such a illegality / irregularity on the part of the Muhraur Staff and Nadeem Armorer.
- J. That in the charge sheet date of delivery on the riffle in question by the appellant to the Muharur staff P.S. Jungle Khel has been mentioned as 08/10/2022 while date on the charge sheet while date on the charge sheet against the appellant is 28/10/2022.

If we admit the dates correct, even then gap between delivery of the weapon in question and inspection is about 20 (twenty) days. These days are sufficient wherein , original riffle can be substituted successfully .

Hence if version of the department is believed even then result in 20 days in respect of the rifle in question is also suspected and highly doubtful.

- K. That fair play demanded, to have inspected the rifle on spot and result should have been endorsed in record on the same day in presence of the appellant but by not inspecting and expressing opinion on the spot the Result after more or less 12 days is again highly doubtful and objectionable because substitution of the rifle is not matter of days but it is an effect matter of minutes. thus such a doubtful result cannot be believed and no punishment on such a suspected opinion can be awarded.
- L. That regarding delivery of the weapon in question the appellant has a video recording but such an important pieces of evidence was ignored by the enquiry officers and as well as the worthy competent authority.
- M. That during enquiry an important witness namely Nadeem Khan Sub-Inspector Armorer was not examined hence the appellant was highly prejudiced.
- N. That no witness was examined in presence of the appellant nor was provided opportunity to cross examine the witness.
- O. That with the instant enquiry question of some source of income and reputation of the appellant was involved but unfortunately the concerned have taken the instant enquiry very lightly which resulted in serious doubt and miscarriage of justice law and fair play to the appellant.
- P. That the appellant assures your good self through all the available means that he is absolutely innocent and he was punished for no fault on his part.
- Q. That enquiry against the appellant was conducted unilaterally and due process or law was not followed.
- R. That the appellant is a law abiding official, he cannot think to commit such illegal, unethical and highly objectionable act.
- S. That the appellants service carrier is clean and he has not been punished during his more or less fourteen years' service.
- T. That during enquiry nothing tangible and trust worthy against the appellant was proved/ establish.
- U. That Art 10 A of the constitution of Pakistan has envisaged that it is fundamental right of the accused/ defaulter that against him fair, transparent and independent proceeding should be conducted. However in case of the appellant by not following due process of Law his fundamental right has

been in infringed which has made the enquiry and punishment as illegal and of no legal consequence.

- V. That it is made factory, that along with the final show cause notice enquiry report has to be provided to the defaulter but the concerned have not delivered the enquiry report, hence such conduct smell a bad rat on part of the department.
- W. That the appellant is the only source of income to his large family if such an unjustified and legally defective order of punishment is maintained it is likely to land family of the appellant in starvation and Allah forbid the appellant will bear irreparable loss.
- X. That the appellant can satisfy your good self about his innocence.
- Y. That if deemed proper the appellant may be heard in person.

Prayer:

It is therefore humbly prayed that by accepting the instant appeal, the impugned punishment order being not in accordance with law, fact, and evidence on record, may be set aside and the appellant may kindly be reinstated in service with all back benefits from the date of punishment. The appellant and his family will be thankful to you for this act of kindness and will pray for your long life and prosperity.

Date: 06.02.2023

  
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Sadiq Ur-Rehman

Ex-constable Belt No-485.  
R/O Tappi / Baqizai Tehsil &  
district Kohat

Mobile No:0331-4144454

Annexure: D

Page No 21

**ORDER.**

This order will dispose of the departmental appeal preferred by **Ex-Constable Sadiq Ur Rehman No. 485** of Kohat District Police against the order of District Police Officer, Kohat, whereby he was awarded major punishment of dismissal from service vide OB No. 41, dated 18.01.2023 on the allegations that he was allotted SMG Rifle bearing No. 48000989, original foreign made (China Rifle) from Kot of Police Stations Jungle Khel Kohat for official duty. On 08.10.2022, he deposited the weapon in Kot which was inspected by Armourer and found to have been replaced / changed with Pakistani made. Thus he committed gross professional misconduct.

Proper departmental enquiry proceedings were initiated against him and SDPO City Kohat was nominated as Enquiry Officer. The Enquiry Officer after fulfillment of all codal formalities submitted his findings wherein he recommended the appellant for major punishment. However, the DPO / Kohat also conducted denove enquiry into through SP / Operation Kohat who vide his findings also recommended him for major punishment.

Keeping in view the recommendations of enquiry officers and other material available on record, the delinquent official was awarded major punishment of dismissal from service by the District Police Officer, Kohat vide OB No. 41, dated 18.01.2023.

Feeling aggrieved from the order of District Police Officer, Kohat, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 02.05.2023.

From the perusal of the enquiry file, service record of the appellant and reasons advanced by him, it came to light that the appellant has committed gross professional misconduct by replacing / changing the weapon.

Keeping in view the above, I, **Sher Akbar, PSP S.St, Regional Police Officer, Kohat**, being the appellate authority, hereby reject the instant appeal being devoid of merit and substance.

**Order Announced.**

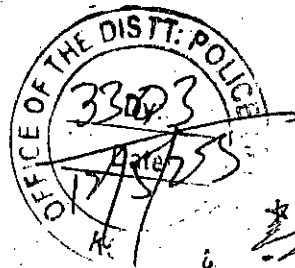
**Regional Police Officer,  
Kohat Region**

No. 4927 /EC, Dated Kohat the 4<sup>th</sup> 15 /2023

Copy forwarded to District Police Officer, Kohat for information and necessary w/r to his office Memo: No. 2759/LB, dated 11.04.2023. His Service Record is returned herewith.

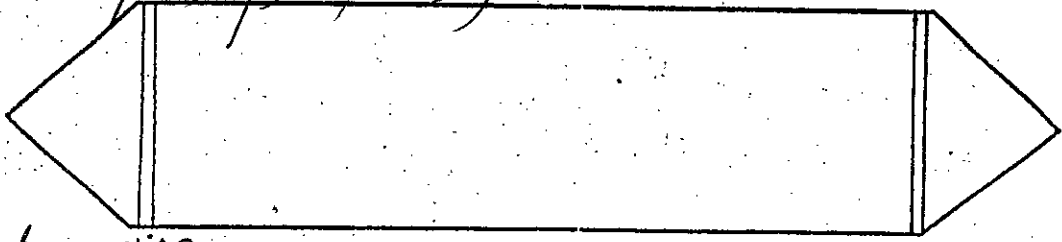
(\*\*\*\*\*)

**District Police Officer  
Kohat**



اورڈر چالی بدست سادیق الرحمن 485  
موم کی 14 کو حوالہ کیا گیا  
23

بعدالت KPIK سرویسز پرائیویٹ لمیٹڈ



Appellant

2، منجانب  
گھریلی الرحمن بنام

موزخہ  
مقدمہ  
دعوی  
جرم

### باعث تحریر آئٹم

مقدمہ مشدہم عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آن مقام کے کے کیلئے کے کے  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخ  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے وہ ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 2014 ماہ جول 2023

واہ الع

KPIK سرویسز پرائیویٹ لمیٹڈ کے لئے منظور ہے۔

بمقام

ی

گھریلی الرحمن

Abhmani

الد