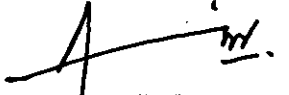


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1465/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/07/2023	<p>The appeal of Mr. Izhar Ali presented today by Mr. Muhammad Asif Yousafzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p>
		<p>By the order of Chairman</p>
		 REGISTRAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1465/2023

Izhar ALI

V/S

Police Deptt:

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2.	Certificate	-----	06
3.	Affidavit	----	07
4.	Copy of charge sheet	A	08
5.	Copy of Statement of allegation	B	09
6.	Copy of reply	C	10
7.	Copy of inquiry finding	D	11
8.	Copy of Copy of show cause,	E	12
9.	Copy of reply	F	13
10.	Copy of order dt: 12.01.2023	G	14-15
11.	Copy of departmental appeal	H	16-20
12.	Copy of order dt: 2.3.2023	I	21
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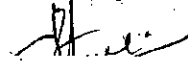
APPELLANT


Izhar Ali

THROUGH:


(M. ASIF YOUSAFZAI),
ASC,


(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1465/2023

Izhar Ali Ex- Sub-Inspector, Firearms,
Section FFSL, Khyber Pakhtunkhwa, Peshawar.

.....(Appellant)

VERSUS

1. The Provincial Police Officer, Peshawar.
2. The Director Forensic Laboratory, KPK Peshawar.
3. The AIG of Police (Investigation) KP, CPO, Peshawar.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 12.01.2023 WHEREBY, THE APPELLANT WAS COMPULSORY RETIRED FROM THE SERVICE AND AGAINST THE ORDER DATED 16/06/2023 WHEREBY, THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 12/01/2023 AND 16/06/2023 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS: ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was enlisted in Police Department, as a foot constable, served for 23-24 years lengthy period and in recognition of efficient working and outstanding performance, reached to the status of Sub Inspector.

2

3. That one sided proceeding was conducted the appellant was not associated with the inquiry proceedings to express his point of view, regarding the alleged charges. The inquiry was conducted against the appellant but no inquiry report was provided to appellant along with show cause and not give a proper chance to appellant to defend himself. But just inquiry finding was provided. **Copy of Inquiry finding is attached as Annex-D**
4. That show cause notice was issued to the appellant which was properly replied by the appellant and denied the entire allegations. On the completion of proceedings, the appellant was awarded major penalty of compulsory retirement from service vide order dated 12.01.2023 under subject without any cogent/solid reason on record and without providing opportunity of personal hearing. **Copy of show cause, reply and impugned order are attached as annexure-E, F & G.**
5. That the appellant feeling aggrieved filed departmental appeal, which was accepted by the respondent No.2 vide order dated 02/03.2023 and appellant was re-instated into service for the purpose of denovo inquiry. **(Copy of departmental appeal and order are attached as Annexure- H & I).**
6. That thereafter, again charge sheet and statement of allegation was issued to the appellant and appellant properly reply to the charge sheet and denied the allegation mentioned in charge sheet, thereafter the inquiry was conducted wherein appellant was exonerated from the charges but the authority not agree with the same. **Copy of statement of allegation, charge sheet and replied are attached as Annexure-J, K & L.**
7. That without issuing show cause notice, the appellate authority place himself at the place of competent authority and vide order dated 16/06/2023 rejected the departmental appeal of the appellant and maintained the punishment already set-aside by himself vide order dated 02/03/2023 which is against the law and amounts to corrum non-judice, **Copy of the order dated 16-06-2023 is attached as annexure-M.**
8. That now the appellant come to this august Tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned order dated 12/01/2023 and 16/06/2023 are against the

which is violation of norms of justice. which is violation reported Judgment cited as 2005 PLC(CS)1527 of superior court.

- D) The whole inquiry proceedings are based on mala-fide; partiality and the impugned order dated 02.01.2023 has been passed in clandestine manner, total disregard of the available record, the law and rules on the subject, the norms of justice and fair play. Principle of justice would be violated.
- E) That the departmental appeal of the appellant was once accepted by the Respondent No.2 then the Respondent No. 2 has no power to review his earlier order and reject the departmental appeal of the appellant which amounts to corrum non judice.
- F) That at the end of denovo inquiry no order of punishment was passed against the appellant but the appellate authority sustain the impugned order of compulsory retirement which is already set-aside by himself.
- G) That in denovo inquiry the appellant was exonerated and without showing reason the appellant held guilty without issuing show cause notice which is violation of Article-10-A of the constitution. If the authority disagree with the inquiry officer he must be given reason but in the case of appellant no reason was shown for disagreement with the inquiry which is violation of the superior court judgment.
- H) That to clarify that the exhibit of case FIR No 220/2022 PS Zaida Swabi was preliminarily examined, by technician/ASI Kamran Aziz who declared the bullet of the injury recovered by MO as unfired which on re-examination/revision by the appellant and the senior/incharge section fire arms Muhammad Ayaz found as deformed and not unfired hence the "unfired" opinion was corrected to "deformed". May be added here that recovered bullet from dead body cannot be disclosed/stated as unfired hence the appellant corrected the opinion of subordinate technician/ASI Kamran Aziz, the case being was a murder one. Worth to mention that there is no other correction or change except "deformed instead of unfired" which was the fault of subordinate technician and not the appellant. The opinion was signed by me and incharge fire arm section and sent for signature to DSP Admin on 06-07-2022, accordingly.
- I) That the charge of exhibit mishandling is baseless rather dairy as the alleged exhibit was received in FSL on 21-06-2022, examined on merit on 22-06-2022 which was sealed on the same day and deposited in the strong room on 23-06-2022. The same was dispatched to district malkhana on the very day

"The inquiry officer shall inquire into the charge and may examine such oral or documentary evidence in support of the charge or in defense of accused as may be considered necessary and the witnesses against him" but no witness has been examined against the appellant and the finding report is based on surmises and conjectures".

- K) The report/findings of the Enquiry Committee (Annexure D) are also in violation of Rule(v) of Police Rules, 1975. The Rules, reproduced hereunder in verbatim, make it obligatory upon the Enquiry Committee to reach conclusion about guilt or innocence of an accused official on the basis of cogent reason. No such reason have been given by the Committee to connect the role of the Appellant to the alleged commission. Therefore, the findings/recommendations of the Enquiry Committee are ibinitio violating the law and the basic right of the Appellant. The same are not maintainable and can be used adversely against the Appellant.
- L) The Committee has never made serious efforts to ascertain as to whether the correction as deformed in place of unfired of appellant on the opinion gets ill- intention or involve any mala fide. It is my solemn affirmation that after examination, the opinion as deformed was added as corrected the opinion of subordinate technician.
- M) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- N) The appellant belongs to middle class family, the service is his only source of earning and the awarded penalty shall be huge loss to him, his carrier as well family, for no good reasons, hence requires sympathetic consideration
- O) There is not an iota of evidence, connecting the appellant prima-facie with the alleged act of misconduct hence cannot be adjudged / assessed from recorded evidence during the course of inquiry proceedings. But all proceeding was conducted due to personal grudges.
- P) The impugned order is in glaring violation of the principles of natural justice and principle of good governance, as no evidence has so far been collected by worthy Inquiry Committee to fix responsibility on the appellant.
- Q) The inquiry proceedings have not been conducted as per provision, contained under Rule 6 of police rules 1975 as the appellant was not afforded the opportunity of cross examination on the witnesses, examined by worthy committee. Superior court decision reported in 2005 PL C(CS)1527.

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situation, not sustainable, (reported in judgment 2005-PLS (C.S) 1559), The inquiry Committee has not disposed off inquiry proceeding in proper/legal way rather without collecting cogent evidence against appellatant but completed it in haste, superfluous and slipshod manner. Therefore, awarding major penalty on the basis of such recommendations, are unjust, inappropriate and uncalled for, The Superior Courts have strongly condemned this short cut proceedings without recording evidence in disciplinary proceedings, reported in judgments, depicting as under:-

- PLJ 2005(CS 113)
- 2005 PLC (CS 1384)
- 2004(SCMR 1662)
- 2005 PLC(SC 1544).
- 2004 (CS 1505)
- 2004 SCMR 630
- 2004 SCMR 116.

- T) That the Committee in its findings has not spelled out "NEGLIGENT" act of the Appellant and levelled the charge on mere presumption. Therefore on the basis of mere presumption, awarding major punishment to the appellatant by the learned authority is uncalled for, unjust and very harsh. Such treatment with public servant has been deprecated by the Apex Court of the country. Referring the Hon'able Supreme Court Judgments (i) 2002 SCMR 857, (ii) 2005 PLC(CS)1559 (iii) 2005 PLC(CS)1527: No witness was examined in presence of appellatant and he was also deprived of the right of cross examination hence appellatant was reinstated and considered entitle to full back benefits.
- U) That the appellatant seeks permission to advance others grounds and proofs at the time of hearing.

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

Izhar Ali
APPELLANT

Izhar ALi

THROUGH:

M. Asif Yousafzai
(M.ASIF YOUSAFZAI),
ASC

Syed Noman Ali Bukhari
(SYED.NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT

& *Ali*

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

6

SERVICE APPEAL NO. _____/2023

Izhar Ali

V/S

Police Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

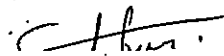
1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.


APPELLANT
Izhar ALi

THROUGH:


(M. ASIF YOUSAFZAI),
ASC

& 
SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)



(7)

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. _____/2023

Izhar Ali

V/S

Police Deptt:

AFFIDAVIT

I, Izhar Ali (Appellant), do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honourable Tribunal.


DEPONENT

Izhar Ali



(2) (9)

B

Forensic Science Laboratory
29, Sector B-1 Phase 5 Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel. Tel. 091-9217394 / Fax. 091-921725

DISCIPLINARY ACTION

I, Waqar Ahmad Director FSL Khyber Pakhtunkhwa Peshawar, being competent authority, am of the opinion that you Sub Inspector Izhar Ali of Firearms Section FSL have rendered yourself liable to be proceeded against departmentally as you have allegedly committed the following acts of omissions/commissions within the meaning of Rule 3 of Police Rules 1975.

SUMMARY OF ALLEGATIONS

Upon the internal information to the Director FSL, Peshawar that in the case FIR No. 220, dated 17.06.2022 u/s 302/324/31 Police Station Zaida District Swabi during the analysis of the case exhibit there has been alleged manipulation in the notes recorded by the staff of Firearms Section FSL. Furthermore, along with records, the case exhibit itself is also replaced. You being the expert of Firearms Section are responsible for the following allegations.

1. Tampering with the record of Firearms Section.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/applications to the knowledge of seniors.
3. Tampering/mishandling with the case exhibits with criminal intent.

For the purpose of scrutiny with reference to the above allegations Enquiry Committee comprising of Mr. Khalid Anwar DSP Admin FSL and Mr. Syed Amarat Ali Shah incharge Firearms Section FSL has already been constituted.

H/C

(WAQAR AHMAD, DSP)
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa
Peshawar

[Handwritten signature]

جناب عالی

ات تک دستیاب شواہد، تحریری سوالات و جوابات سمیت بیانات اور انسپکٹر آواز سابقہ انچارج فائر آرمز سیکشن FSL کے تحریری بیان کے مطابق یہ بات ثابت ہوتی ہے کہ مقدمہ علت 220 کے Exhibit میں موصول ہونے والی بلٹ کے متعلق ابتدائی چکی اویٹس میں ایکٹیشن کے تحریر شدہ رائے میں جو کنگ اور اورا مٹنگ ایکٹیشن کے اجازت کے بغیر کی گئی تھی وہ SI اظہار علی ایکسپرت فائر آرمز سیکشن نے کی تھی۔

یہ بات بھی حقیقت ہے کہ انسپکٹر آواز اور SI اظہار علی نے باہمی طور پر ڈسکس کرنے کے بعد یہ فعل سر انجام دیا ہے۔ تاہم اپنے بیانات و سوالات و جوابات میں بالادونوں افسران کوئی معقول یا قانونی جواز پیش نہ کر سکے تاکہ اپنے کئے کے فعل کا دفاع کریں۔

لہذا بالادونوں افسران کوئی سنسیر اور تجربہ کار ہونے کے باوجود قتل جیسے سنگین مقدمے کے Exhibits کو نہ تو صرف صحیح طریقے سے محفوظ کر سکے بلکہ نہ ہی صحیح اور پر اثر طریقے سے معائنہ کر سکے۔

باوجود اس کے ان بالادونوں افسران کو تحریری اور زبانی طور پر بھی جناب ڈائریکٹر صاحب کی طرف سے بار بار آگاہ کیا گیا تھا کہ جو بھی پیچیدہ قسم کا مسئلہ کیسوں میں سامنے آئے تو فوری طور پر افسران بالا کے علم میں لایا جائے جو کہ انہوں نے اس طرح نہیں کیا جو کہ کھلی غفلت اور ناپرواہی ہے۔

درج بالا حقائق کی روشنی میں انکوائری کمیٹی اس نتیجے پر پہنچی ہے کہ بالادونوں افسران نے غفلت کا مظاہرہ کیا ہے۔ کنگ اور اورا مٹنگ SI اظہار علی نے کی ہے جس کا آواز خان کو بھی علم تھا جنہوں نے اپنے تحریری بیان میں اقرار کیا ہے۔ انسپکٹر آواز نے بطور انچارج معائنہ کا علم ہونے کے باوجود جناب ڈائریکٹر صاحب کو آگاہ نہیں کیا اور خاموشی اختیار کی جو کہ غفلت اور لاپرواہی ہے۔

متذکرہ بالادونوں افسران رد/ قانون کے مطابق سزا کے مستحق ہیں۔

(عمارت علی شاہ)

انچارج فائر آرمز سیکشن

FSL، پشاور

(انکوائری آفیسر)

(خالد انور)

ڈی ایس پی ایڈمن

FSL، پشاور

(انکوائری آفیسر)



Forensic Science Laboratory
29, Sector B-1 Phase 5 Hayatabad
Khyber Pakhtunkhwa Peshawar

Tel & Fax: 091-9217394

No. 490/FSL, Date 29-09-2

E (12)

FINAL SHOW CAUSE NOTICE

WHEREAS, you, Sub Inspector Izhar Ali of Firearms Section FSL Peshawar committed the gross misconduct, as defined in Rule 3 of Police Rules 1975. The following is the statement of allegations:

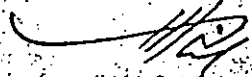
1. Tempering with the records of Firearms Section with ill intentions.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/complications to the knowledge of seniors.
3. Tempering/mishandling with the case exhibits with criminal intent.

Resultantly you were issued charge sheet with the summary of allegations. Enquiry Committee consisting of Mr. Khalid Anwar DSP/Admin and Mr. Syed Amarat Ali Shah was constituted to conduct Departmental Enquiry into the matter.


WHEREAS, the enquiry officers finalized the enquiry proceeding by giving you full opportunity of defense as well as cross examination and the statements of all PWs have been recorded. Consequent upon completion of enquiry proceedings, the Enquiry Committee has communicated its findings.

WHEREAS, going through the findings and recommendation of the Enquiry Committee, material placed on record and other relevant papers including your defense before the Enquiry Committee, I Waqar Ahmad, PSP, Director FSL, Khyber Pakhtunkhwa, Peshawar issue you this Final Show Cause Notice to offer you full opportunity to come up with satisfactory reply supported by evidence in your defense.

You are therefore, required to submit reply to this Final Show Cause Notice within Seven Days of the receipt of this notice.


(WAQAR AHMAD) PSP
DIRECTOR
Forensic Science Laboratory
KP, Peshawar

Received


mp
28/10/20
/P/SL
Swat
~~3/10/20~~ 3/10/20

جناب عالی!

بحوالہ فائیل شوکار نوٹس نمبری FSL/490 مورخہ 29/09/2022 بحاریہ جناب ڈائریکٹر صاحب، سٹوڈیو باہ معروض خدمت ہوں۔

یہ کہ سائل نے بطور فائیر آرمز ایکسپرت جیسے مقدمات اپنے سینٹر انچارج کے زیر نگرانی معائنہ کئے ہیں تمام معائنہ شدہ مقدمات بشمول مقدمہ تذکرہ علت نمبر 220 مورخہ 17/06/2022 جرم PPC 302/324/34 پولیس سٹیشن زیدہ ضلع صوابی کا ریکارڈ FSL میں نیز کمپیوٹر پرنٹر کے ساتھ

کمپیوٹر ڈیٹا میں موجود ہیں۔ کسی بھی مقدمہ کے Opinion میں کوئی نمبر لگ موجود نہیں ہیں۔
مقدمہ تذکرہ علت نمبر 220 مورخہ 21/06/2022 بغرض ماہر اندر رائے FSL پشاور موصول ہوئی تھی اور مورخہ 22/06/2022 کو انچارج فائیر آرمز سیکشن انسپکٹر محمد آواز اور

مس SI کے میرٹ کے بنیاد پر معائنہ کیا ہے جو ASI کا مرن عزیز ٹیکنیشن فائیر آرمز سیکشن کو مارک کیا گیا تھا۔
سیکشن کا مرن عزیز کی حالیہ پوسٹنگ بحوالہ آرڈر نمبری FSL/207 مورخہ 27/05/2022 بحاریہ جناب DSP ایڈمن خالد انور نے فائیر آرمز

سیکشن کی تھی جس نے سبکی Opinion بحوالہ پارسل نمبر 05 نمبر گولی جو ڈاکٹر صاحب نے دوران پوسٹ مارٹم مقتول کے جسم سے برآمد کی تھی اور
میزیکل رپورٹ بھی فائل کے ساتھ لف ہے درست ہے تھی نظر ثانی (Review) کے لیے پیش کیا حسب ضابطہ میکانیکل (Review) کر کے ٹیکنیشن
کی سبکی Opinion میں میکانیکل تصحیح کر کے درستگی کی اور ساتھ ہی اپنے جو میٹر کو ہدایت دی۔
مال مقدمہ حسب ضابطہ ٹیکنیشن شاف پراپرسل گا کر نمبر لگ روم مورخہ 23/06/2022 کو جمع کیا گیا اور باضابطہ تیار شدہ رپورٹ کمپیوٹر پرنٹر کو ٹائپ

کے لئے رکھ دیا گیا۔
ٹائپ شدہ رپورٹ چیک کر کے جو ہمارے ریکارڈ کے مطابق تھی ریکارڈ کے عین مطابق درست Opinion جس پر انچارج فائیر آرمز سیکشن اور مس
SI نے دستخط کر کے حسب ضابطہ انٹری رجسٹر فائیر آرمز سیکشن میں اندراج کر کے دستخطی کے لیے جناب DSP ایڈمن خالد انور صاحب کو مورخہ
6/07/2022 بھجوا دیا گیا۔

مقدمہ تذکرہ میرٹ کے بنیاد پر مینول کے مطابق (Chain of Custody) کو برقرار رکھتے ہوئے تجزیہ کیا گیا اور ہمارے تحویل کے دوران مال
مقدمہ میں کسی قسم کی چھینر چھاز یا اس ہینڈ لگ نہیں ہوئی ہے (Chain of custody) کا جملہ ریکارڈ درست طور پر موجود ہیں۔ فارنزک کے بنیادی
اصول کے مطابق میکانیکل ریویو کے دوران سبکی Opinion میں میکانیکل درستگی کرنے میں ہمارے کسی قسم کی بددیانتی یا بھرتیائی شامل نہ ہے بلکہ ذمہ
داری ہے۔

محنت جو نیز ہر درپیش پیچیدگی کی صورت میں اپنے سینئر انچارج فائیر آرمز سیکشن کے نوٹس میں لاتا رہا ہوں، تجزیہ شدہ مقدمات کے میکانیکل ریویو وکس
کر کے Opinion دستخط کرتے ہیں ڈسپلن کے تحت انچارج صاحب ہی ہر پیچیدہ مسئلہ آفسران بالا کے نوٹس میں لاتا ہے میں نے کوئی امر اپنے آفسران
بالا سے مخفی نہیں رکھا ہے اور نہ ہی آفسران بالا کی حکم عدولی کی ہے اور نہ مجھ سے کوئی دانستہ غلطی ہوئی ہے۔
لہذا میں سائل عاجز اندہ استدعا کرتا ہوں کہ سائل کے خلاف لگائے گئے الزامات میں کوئی حقیقت نہیں ہے فائیل شوکار نوٹس کو مزید کسی کارروائی کے بغیر
داخل دفتر کرنے کا حکم صادر فرمایا جاوے۔ سائل انجناب کی اس احسان کا عمر بھر دعا گو رہوں گا۔

آپ کا تابع دار سب انسپکٹر اظہار علی فائیر آرمز ایکسپرت
مستندہ خال انچارج فائیر آرمز سیکشن RFSL سوات۔
مورخہ



Forensic Science Laboratory
29, Sector B-1, Phase-V, Hayatabad,
Khyber Pakhtunkhwa, Peshawar.
Tel. 091-9217394 / Fax. 091-92172

ORDER

This order will dispose off the departmental enquiry against Inspector Muhammad Ayaz and Sub Inspector Izhar Ali of Firearms Section FSL Peshawar who committed the following acts of omission/commission:

ALLEGATIONS AGAINST INSPECTOR MUHAMMAD AYAZ

1. Tempering with the records of Firearms Section with ill intentions.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/complications to the knowledge of seniors.
3. Loose control over the record and staff of the Firearms Section.
4. Tempering/mishandling with the case exhibits with criminal intent.

ALLEGATIONS AGAINST SI IZHAR ALI

1. Tempering with the records of Firearms Section with ill intentions.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/complications to the knowledge of seniors.
3. Tempering/mishandling with the case exhibits with criminal intent.

Charge sheet and summary of allegations were issued to both the delinquent officers while an enquiry committee comprising DSP Admin FSL Mr. Khalid Anwar and Inspector Syed Amarat Ali Shah Incharge Firearms Section FSL was constituted to conduct the departmental enquiry against the above named officials.

Findings of the enquiry committee were received wherein both the delinquent officers were found guilty. Final Show Cause Notices were issued to them and replies of the same were received which were found to be unsatisfactory.

They were heard in person and were given ample opportunity but they could not present any plausible justification regarding allegations leveled against them.

I have gone through the available material placed on file and has found Inspector Muhammad Ayaz and Sub Inspector Izhar Ali of Firearms Section FSL guilty of the charges leveled against them.

Keeping in view the above facts and his long service of 31 years to his credit I, the undersigned, being competent authority, hereby award Sub Inspector Izhar Ali major punishment of "Compulsory Retirement from Service" under Police Rules 1975 (Amended 2014 KP Police E&D Rules 2014), with immediate effect.



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Forensic Science Laboratory
29, Sector B-1, Phase-V, Hayatabad
Khyber Pakhtunkhwa, Peshawar.
Tel. 091-9217394 / Fax: 091-92172

Furthermore, Inspector Muhammad Ayaz is also found guilty of the charges as mentioned above, rendering him liable to be awarded major punishment. But recently, he had been already awarded major punishment of Compulsory Retirement from Service in another enquiry vide this office order No. 22-27/FSL, dated 06.01.2023 for the following allegations:

1. That Inspector Muhammad Ayaz of Fire Arms Section FSL Peshawar had a large number of live cartridges and he had not maintained a proper register for inventory and live cartridges despite instruction from seniors previously.
2. When DSP Admin FSL asked him about the stock register he had told that the register was at his home.
3. That he had never informed his seniors regarding unaccounted live cartridges and inventory.
4. Storing large number of ammunition in a haphazard and unsafe way could have resulted in accidental mishap at FSL.
5. Upon search of the Fire Arms Section by DSP Admin FSL, 68.5 grams (gross weight) CHARAS was recovered from his cabinet under lock & key and was opened with keys by himself in the presence of Rahat Ullah (incharge HR) and Sana Ullah (Line Officer FSL).
6. The above mentioned allegations showed his lack of interest in official duty and attempt to misappropriate govt. property (unused ammunition). It was not clear at that stage as to how much ammunition he had taken away from FSL for his personal gains.

Order announced.

No. 43-50/FSL,

Dated Peshawar, the 12 /01/2023

Copy of above is forwarded for information and necessary action to the:

1. Addl. Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar for kind information, please.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director, RFSL, Swat.
4. Incharge Firearms Section, FSL.
5. Accountant, FSL, Peshawar.
6. Line Officer, FSL, Peshawar.
- ✓ 7. Official concerned.

(WAQAR AHMAD) PSP
Director

Forensic Science Laboratory,
K.P, Peshawar

H. 16

Before the Hon'able Additional Inspector General of Police (Investigations)
CPO Peshawar

Subject: Departmental Appeal u/r 11 of Police Rules 1975 (Amended 2014), against the impugned order, Passed by W/Director FSL Peshawar vide Endost No. 43-50/FSL dated 12.01.2023, where by the appellant was awarded major penalty of compulsory retirement.

Sir,

The appellant respectfully prefers this appeal against the impugned order of W/Director FSL Peshawar inter-alia on the following grounds, amongst others. (Order enclosed as Annexure-A).

PRELIMINARIES:

1. At the very outset, this may to clarify that the exhibit of case FIR No 220/2022 PS Zaida Swabi was preliminarily examined by technician/ASI Kamran Aziz who declared the bullet of the injury recovered by MO as unfired which on re-examination/revision by the appellant and the senior/incharge section fire arms Muhammad Ayaz found as **deform** and not unfired hence the "**unfired**" opinion was corrected to "**deformed**". May be added here that recovered bullet from dead body cannot be disclosed/stated as unfired hence the appellant corrected the opinion of subordinate technician/ASI Kamran Aziz, the case being was a murder one. **Worth to mention that there is no other correction or change except "deformed instead of unfired" which was the fault of subordinate technician and not the appellant. The opinion was signed by me and incharge fire arm section and sent for signature to DSP Adm on 06-07-2022, accordingly.**
2. The charge of exhibit mishandling is baseless rather airy as the **alleged exhibit** was received in FSL on 21-06-2022, examined on merit on 22-06-2022 which was sealed on the same day and deposited in the strong room on 23-06-2022. The same was dispatched to district malkhana on the very day i.e 23-06-2022. **(record photocopies is enclosed as ready reference/ annexure B, B/1 & B/2)**
3. The inquiry proceedings have not been conducted in accordance with the prevailed rules, contained u/r 6(ii) of Rules 1975 (Amended 2014), as no proper procedure has been followed by worthy inquiry committee nor they have

mentioned / shown cogent grounds to connect the appellant with the alleged charge. Rule 6(ii) provide procedure as under:-

"The inquiry officer shall inquire into the charge and may examine such oral or documentary evidence in support of the charge or in defense of accused as may be considered necessary and the witnesses against him" but no witness has been examined against the appellant and the finding report is airy rather based on surmises and conjectures.

4. The report/findings of the Enquiry Committee (**Annexure C**) are also in violation of Rule(v) of Police Rules, 1975. The Rules, reproduced hereunder in verbatim, make it obligatory upon the Enquiry Committee to reach conclusion about guilt or innocence of an accused official on the basis of cogent reason. No such reasons have been given by the Committee to connect the role of the Appellant to the alleged commission. Therefore, the findings/recommendations of the Enquiry Committee are ibinitio violating the law and the basic right of the Appellant. The same are not maintainable and can be used adversely against the Appellant.

Rule 6(v) reads as under:-

"The inquiry officer shall within 10 days of the conclusion of proceedings or such longer period as may be allowed by the authority, submit his findings and grounds thereof to the authority".

Additionally the time frame provided for in the above Rules were also not adhered to, therefore, the Enquiry Committee has also violated the above Rule, and rendered the report and recommendations based thereupon illegal.

5. The Committee has never made serious efforts to ascertain as to **whether the correction as deformed in place of unfired** of appellant on the opinion gets ill-intention or involve any mala fide . It is my solemn affirmation that after examination, the opinion as deformed was added as corrected the opinion of subordinate technician.
6. **Superior court decision, reported in 2005 PLC(CS)1527: No witness was examined in presence of appellant hence appellant was reinstated and considered entitle to full back benefits.**
7. No tangible and substantial reasons were recorded by worthy authority, for dispensing with inquiry proceedings as per law hence the services tribunal set

aside the major penalty of compulsory retirement, reported in judgment 2005 PLS (C.S) 240, on this ground.

- 8. Bare perusal of the finding report (Annexure C) does not reflect any direct or indirect evidence but based on here say, **the major penalty in such situation, was converted into minor penalty of stoppage of 03 increments, without cumulative effect. (reported in judgment 2005 PLS (C.S) 1559).**
- 9. The inquiry Committee has not disposed off inquiry proceeding in proper/legal way rather without collecting cogent evidence against appellant but completed it in haste, superfluous and slipshod manner. Therefore, awarding major penalty on the basis of such recommendations are unjust, inappropriate and uncalled for. The Superior Courts have strongly condemned this **short cut proceedings** without recording evidence in disciplinary proceedings, reported in judgments, depicting as under:-

- PLJ 2005(CS 113)
- 2005 PLS (CS 1384)
- 2004(SCMR 1662)
- 2005 PLS(SC 1544)
- 2005 PLC (CS 1505)
- 2004 SCMR 630
- 2004 SCMR 116

ON FACTS:

- 1. The appellant was enlisted in this august force, as a foot constable, served for 23-24 years lengthy period and in recognition of efficient working and outstanding performance, reached to the status of Sub Inspector.
- 2. Short facts are that on the exhibit of case FIR no 220/2022 PS Zaida, the appellant was charged for having allegedly committed tempering with ill intentions, mishandling case exhibits with criminal intent and not following the instructions issued by director FSL for not bringing in the notice of seniors.
- 3. The proceedings are one sided and as per law / rules, the appellant was not associated with proceedings to express his point of view, regarding the charge.

- 4. The appellant was issued charge sheet/subsequently final show cause notice to which plausible replies (**exhibits D/D-1**) were submitted but stance, advanced by appellant was not considered and discarded without any cogent reason, followed by **award of major penalty of compulsory retirement.**

GROUND OF APPEAL:

The impugned order of W/Director FSL Peshawar is assailable on the following grounds.

- 1. The impugned order is in glaring violation of the principles of natural justice and principle of good governance, **as no evidence has so far been collected by the inquiry officer to fix responsibility on the appellant which the appellant has clarified through self-explanatory Annexures.**
- 2. The inquiry proceedings have not been conducted as per provision, contained under Rule 3 of police rules 1975 as the appellant was not afforded the opportunity of cross examination on the witnesses, examined by worthy inquiry officer.
- 3. There is not an iota of evidence, connecting the appellant prima-facie with the alleged act of misconduct hence cannot be adjudged / assessed only on the mere allegation without recording proper evidence against the appellant by inquiry committee.
- 4. The alleged charges against the appellant are unjustifiable as no direct evidence for his involvement in the act of misconduct is available, thus is considerable under the law of justice, recorded evidence and factuality on the following principle.
 - a. **The principle of natural justices would be violated only when an action is taken against a person without his knowledge (NLR 214 April QTA).**
- 5. The whole inquiry proceedings are based on mala-fide, partiality and the impugned order dated **12.01.2023** has been passed in clandestine manner, total disregard of the available record, the law and rules on the subject, the norms of justice and fair play.
- 6. Perusal of inquiry proceedings clearly reflects that there are no incriminating materials which can condemn or connect the appellant with alleged charge but dragged for the reason as member of the Section / Branch.

7. The quantum of punishment as per law must be appropriate, compatible and reasonable qua act or omission, allegedly committed by civil servant, reported in 1988 PLC (CS) 179, therefore the punishment awarded to appellant is very harsh, unreasonable and against the natural justice.
8. The appellant has spotless service record of 23-24 years and throughout his career he has been awarded, commended and blessed.
9. The appellant belongs to middle class family and the service is his only source of earning and the awarded major penalty of compulsory retirement shall cause irreparable and huge financial loss to the appellant, career as well family repute, for no good reasons, hence requires sympathetic consideration.

PRAYER

Above in view, it is humbly prayed that by accepting this appeal, the impugned order dated 12.01.2023 may very kindly be set aside, reinstated in service to meet the ends of justice.

Sincerely yours

Izhar Ali Ex Sub-Inspector FSL (Appellant)



I

21

**OFFICE OF THE ADDITIONAL INSPECTOR GENERAL OF POLICE,
INVESTIGATION - KHYBER PAKHTUNKHWA, PESHAWAR.**

Ph: 091-9210024

Fax: 091-9210052

ORDER

This order will dispose-off the departmental appeal preferred by Sub Inspector Izhar Ali of Forensic Science Laboratory (FSL), Khyber Pakhtunkhwa against the order of Director FSL, Khyber Pakhtunkhwa in which he has been Compulsorily retired from Service on the following charges levelled against him:-

1. That he while posted in Firearms Section was found tampering with the record of Firearms Section with ill intention.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/complications to the knowledge of seniors.
3. Tempering/mishandling with the case exhibits with criminal intent.

Proper departmental proceeding were conducted against him in which the charges levelled against him were proved. From the whole material placed on file, the undersigned came to the conclusion that though the charges levelled against him have been proved beyond any shadow of doubt, but the matter needs more probe in order to ensure merit based decision and to ensure justice in the instant case.

Therefore, following the rules & regulation he is re-instated in Service with immediate effect for the purpose of denovo proceedings. Period he remained out of service is treated as leave without pay.

A separate denovo proceeding is being initiated against him.

(DR. ISHTIAQ AHMED MARWAT)

PSP/PPM

Additional Inspector General of Police,
Investigation, Khyber Pakhtunkhwa,
Peshawar.

No. 2445-48/22 / Invest: dated Peshawar the 02/03/2023

Copy of the above is forwarded for information and necessary action to the:-

1. DIG/Admin./Investigation HQrs: CPO, Peshawar.
2. Director/FSL, Khyber Pakhtunkhwa, Peshawar.
3. SSP/ Investigation HQrs:, CPO. Warsak Road, Peshawar.
4. PA to Addl: IGP/Investigation, KP, Peshawar.



Forensic Science Laboratory
29, Sector B-1 Phase 5 Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel. Tel. 091-9217394/Fax. 091-9217251
No. 272/FSL, Dated: 06/03/2023

Sub Inspector Izhar Ali,
Firearms Section,
Forensic Science Laboratory,
Peshawar.

CHARGE SHEET

I, Waqar Ahmad Director FSL, Khyber Pakhtunkhwa Peshawar being competent authority, hereby charge you Sub Inspector Izhar Ali of Firearms Section FSL, that upon the internal information and submission of finding report of preliminary enquiry committee to the Director FSL Peshawar that in the case FIR No. 220, dated 17.06.2022 u/s 302/324/34 Police Station Zaida District Swabi, during the analysis of the case exhibit there has been alleged manipulation in the notes recorded by the staff of Firearms Section FSL. Furthermore along with the records, the case exhibit itself is also replaced. You being the expert of Firearms Section are responsible for the following allegations:

1. Tampering with the records of Firearms Section with ill intentions.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/complications to the knowledge of seniors.
3. Tampering/mishandling with the case exhibits with criminal intent.

By reasons above, you appear to be guilty of misconduct under Rule-3 of Police Rules 1975 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.

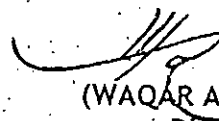
Your written defence if any should reach to the Enquiry Committee within the specified period, failing which it shall be presumed that you have no defence to put in and in that case exparte action shall be taken against you.

You are, therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the Committee.

Intimate whether you desire to be heard in person or otherwise.

A statement of allegations is enclosed.

Received on 6/3/2023


(WAQAR AHMAD) PSP
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa
Peshawar

Izhar Ali (SI)

FSL



Forensic Science Laboratory

29, Sector B-1 Phase 5 Hayatabad

Khyber Pakhtunkhwa Peshawar

Tel. Tel. 091-9217394/Fax. 091-9217251

No. /FSL, Dated: 06/03/2023

DISCIPLINARY ACTION

Waqar Ahmad Director FSL Khyber Pakhtunkhwa Peshawar, being competent authority, am of the opinion that you Sub Inspector Izhār Ali of Firearms Section FSL have rendered yourself liable to be proceeded against departmentally as you have allegedly committed the following acts of omissions/commissions within the meaning of Rule-3 of Police Rules 1975.

SUMMARY OF ALLEGATIONS

Upon the internal information to the Director FSL, Peshawar that in the case FIR No. 220, dated 17.06.2022 u/s 302/324/34 Police Station Zaida District Swabi during the analysis of the case exhibit there has been alleged manipulation in the notes recorded by the staff of Firearms Section FSL. Furthermore, along with records, the case exhibit itself is also replaced. You being the expert of Firearms Section are responsible for the following allegations.

1. Tampering with the record of Firearms Section.
2. Violating the instructions of the Director FSL regarding bringing any discrepancies/applications to the knowledge of seniors.
3. Tampering/mishandling with the case exhibits with criminal intent.

For the purpose of denovo proceeding against SI Izhār Ali of Firearms Section FSL, a departmental committee consisting of Mr. Irshad Khan SSP Investigation Unit CPO and Mr. Janan Habib DSP Admin Investigation Unit CPO has been constituted vide order No.2441-44/EC/Invest, dated 02.03.2023.

(WAQAR AHMAD) SSP

Director

Forensic Science Laboratory,
Khyber Pakhtunkhwa,
Peshawar

سین تده مال قدرہ ٹینٹن کا مال غیر ہے اسے بحول سے کھولا اور برائے نمائندگی کی موجودگی کی صورت
 پر دو ایکسپریٹس کی ہے۔ ہونا کہہ گویا کہ متعلقہ لکھتی ہے صرف ایک ہی سوال
 اور کے متعلق وضاحت طلب کی گئی ہے۔ گھبراہتی طور پر ہونا کہہ گویا کہ متعلقہ لکھتی ہے صرف ایک ہی سوال
 کہ توئی والی سائل میں بند ہے۔ حال کو سائل میں بند ہے کہ گویا سائل سائل سائل سائل سائل سائل
 میں اندراج کرنا وصال اور خیر خیر ٹینٹن کا مال کی ذمہ داری ہے

یہ ایک بے شمار الزام ہے۔
 مورخ 22 کوئی برائے سائل کو جمع کیا گیا ہے اور مورخ 23 کو اخبار سے ایک ایک سائل کو
 اور سی دن اسٹریٹ صوابی کا جہاں مال مقدمات لکھوں مقدم ہوا صلی مال مالانہ سائل کو
 اسیارڈ پر مورخ کے ہمارے ہے (تمام اسیارڈ لکھے)

مقدمہ میں تمام متعلقہ سائلوں کو دیکھ کر اور کسی امر پر اصرار والا ہے کہ کسی شخص کے لئے
 اخبار سے لکھیں گے سب سے سب سے سب سے سب سے سب سے سب سے سب سے سب سے سب سے
 اصرار والا ہے سب سے سب سے سب سے سب سے سب سے سب سے سب سے سب سے سب سے

مورخ 8/3/2023

مورخ

آپ کا ہمدرد

10
15/3/23

Reply-received
 today on 10.03.2023
 10/3/23

OFFICE OF THE
ADDITIONAL INSPECTOR GENERAL OF POLICE,
INVESTIGATION BRANCH CPO
KHYBER PAKHTUNKHWA PESHAWAR



ORDER

This order will dispose-off the Denovo Proceedings being initiated against SI Izhar Ali of Fire Arms Section FSL, who was awarded major punishment of compulsory retirement from service by the Director FSL KP, Peshawar under Police Rules 1975 (Amended 2014 KP Police E&D Rules 2014) vide his office order No. 43-50/FSL, dated 01.03.2023 on the following allegations:-

Allegations:-

1. That he was involved in tempering the record of Fire Arms Section with ill intentions.
2. That he violated the instructions of the Director FSL regarding bringing any discrepancies/complications to the knowledge of his seniors
3. That tempering/mishandling the case exhibits with criminal intent of case FIR No. 220, dated-17.06.2022 u/s 302/324-34-PPC, PS Zaida District Swabi.

Director FSL, KP constituted an Enquiry Committee to conduct proper departmental proceedings against him. The Enquiry Committee in his findings held him responsible for the charges levelled against him.

Being found guilty of the gross misconduct, he was awarded "major punishment of compulsory retired from service" by the Director, FSL Peshawar.

Later on, he preferred a departmental appeal to the undersigned for re-instatement in service and to set aside the order of his compulsory retirement from service.

Going through the enquiry file, and hearing the applicant the undersigned directed for Denovo enquiry to be conducted by SSP/Investigation, CPO & DSP Admn, Investigation. The committee conducted Denovo enquiry and submitted findings, with which the undersigned did not agree, being devoid of in-depth probe into the whole case. DIG/Investigation was directed to review the whole case file whereby DIG/Investigation submitted his findings in which he held both Ex-Inspector Muhammad Ayaz and SI Izhar Ali for gross misconduct & misuse of official position/authority for ulterior motives & personal gains with complete disrespect for professional demeanour.

Having gone through the findings of review of DIG/Investigation, the undersigned is of considered view that the punishment given by Director FSL is commensurate with the misconduct of the appellant. Hence his appeal is hereby rejected and the punishment of compulsory retirement from service shall stand.

Order announced

(DR. ISHTIAQ AHMED MARWAT) PSP/PPM
Additional Inspector General of Police
Investigation, Khyber Pakhtunkhwa,
Peshawar

No. 6132-35/EC/Inv, dated Peshawar, the 16/06/2023.

Copies are sent for information and necessary action to the:-

1. DIG Admn Investigation, CPO, Peshawar.
2. Director FSL KP Peshawar.
3. PA to Additional IGP/Investigation.
4. Officer concerned.



Forensic Science Laboratory

Police Station, ...

...

...

Laboratory No. EA-23-6583-85-2022 Received the sealed parcel on ...
At FSL from SHO P.S. Zalda District Sindh

The seals on parcels were found intact.

F.I.R No. 220 dated 17-06-2022 U/S 302/324/34 PS Zalda District Sindh

- 1 P No.2 having three seals of SZ containing, Three 30 bore crime empties now marked C1 to C3.
- 2 P No.3 having three seals of SZ containing, Fourteen 9mm bore crime empties now marked C4 to C17.
- 3 P No.5 having three seals of SZ containing, A small plastic jar covered with adhesive plaster by the doctor having one deform crime bullet now marked B.

NOTE: The exhibits were signed by the experts.

OPINION:- Microscopic examination of the case has revealed as under:-

The three 30 bore crime empties marked C1 to C3 were fired from one and the same 30 bore weapon, in view of the following major points i.e. striker marks, breach face marks and ejector marks etc are similar.

The fourteen 9mm bore crime empties marked C4 to C17 were fired from one and the same 9mm bore weapon, in view of the following major points i.e. striker pin marks, breach face marks and ejector marks etc are similar.

The one deform crime bullet marked B is that of 30 bore.

- Note: (1)
- (2) Any report without embossing marks is not genuine.
- (3) The contents of the parcel were under our immediate custody until the examination was completed.

FIRE ARMS EXPERT

FIRE ARMS EXPERT

/FSL, Dated ... /2022

The opinion of the Fire Arms Expert is forwarded to SP/Inv. Kohat.
The receipt may be acknowledged and the exhibits collected from this Laboratory.

P. 1001

(3) 30 bore Golden color

10/10/22

C₁ 2
C₂ 3
C₃ 12

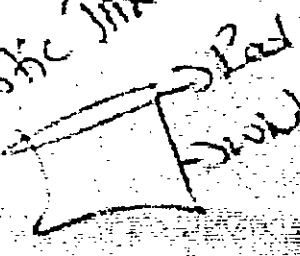
→ One and the same

(10) some c emth marked Silver color

→ one and the same group from silver shiny color. Tolent

10/10/22

A Plastic Ink



Deformed glass
white base color

10/10/22
Siberian

17/6/22

deformed glass was from (30 bore) some group
while some group
made were from

10/10/22



FIREARMS UNIT (FTM), FSL, PESHAWAR

FA/SOP/L3/004	Standard Operating Procedures	Issue on	06-02-2019	Revision	0:0
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6.5 Procedure

6.5.1 Case Processing Sheet

i. Each examiner will utilize the "Case Processing Sheet" worksheet to keep a running log of all work done on a case. This form will include:

- Admin Review
- Technical Review
- Internal Chain of Custody
- Case Notes
- Any other pertinent information

ii. The examiner may choose to use photography as a means of documenting evidence condition, or for giving a visual account of any procedures used.

iii. If the material is NOT going to be retained for further examination or a representative sample has already been obtained, proceed with the following:

- For evidence containing blood, tissue, or other biohazards, soak or sonicate the evidence for at least one (1) minute in a Bleach Solution.
- Remove loosened material by rinsing with methanol or water.
- Use a non-abrasive brush to remove loose material.
- Remove paint by soaking in alcohol or acetone (if required for completion of examination)

iii. Adhering Material

- Components may remain which could indicate the type of ammunition used, such as:
 - Gunpowder or powder imprints may reveal the type of propellant.
 - The use of sealant in the ammunition.

6.5.3 Observations/Measurements

i. Visual Examination

• Evaluate condition of the evidence and determine whether the item is a bullet, bullet jacket, bullet fragment, or bullet core by considering the following:

- o Mushroomed, flattened, torn jacket
- o Extraneous markings (i.e. flared base, skid marks, shave marks, other)
- o Size
- o Shape
- o Any rifling impressions present

6588 = 10/1/1967
 677 = 10/1/1967
 678 = 10/1/1967
 679 = 10/1/1967
 680 = 10/1/1967
 681 = 10/1/1967
 682 = 10/1/1967
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 694 = 10/1/1967
 695 = 10/1/1967
 696 = 10/1/1967
 697 = 10/1/1967
 698 = 10/1/1967
 699 = 10/1/1967
 700 = 10/1/1967
 701 = 10/1/1967
 702 = 10/1/1967
 703 = 10/1/1967
 704 = 10/1/1967
 705 = 10/1/1967
 706 = 10/1/1967
 707 = 10/1/1967
 708 = 10/1/1967
 709 = 10/1/1967
 710 = 10/1/1967
 711 = 10/1/1967
 712 = 10/1/1967
 713 = 10/1/1967
 714 = 10/1/1967
 715 = 10/1/1967
 716 = 10/1/1967
 717 = 10/1/1967
 718 = 10/1/1967
 719 = 10/1/1967
 720 = 10/1/1967

Register of Letters Despatched

Serial No. & Date	Name and Address	Place	Subject	File No.	Summ. Received	Stamp	Stamp	Stamp	Stamp
سریال نمبر و تاریخ	نام و پتہ	جگہ	مضمون	فائل نمبر	مکمل شدہ	مکمل شدہ	مکمل شدہ	مکمل شدہ	مکمل شدہ
6809	6840	6706	6957	6981	6953	6953	6953	6953	6953
6835	6735	6707	7041	6990	7048	6953	6953	6953	6953
6980	6547	6950	7026	6970	6982	6953	6953	6953	6953
7005	6923	6887	7046	6925	6924	6953	6953	6953	6953
6528	6913	6713	6583	6844	6948	6953	6953	6953	6953
6554	6841	6748	7082	6926	6753	6953	6953	6953	6953
6910	6803	6609	6534	6519	6753	6953	6953	6953	6953
6555	6828	6599	6983	7030	6711	6953	6953	6953	6953
6867	6788	6595	6755	7015	6821	6953	6953	6953	6953
6594	6746	6557	6954	7031	6571	6953	6953	6953	6953
6800	6928	6586	6930	7003	6575	6953	6953	6953	6953
65264	6809	6571	6989	6747	7011	6953	6953	6953	6953
6629	6524	6530	6615	6737	6976	6953	6953	6953	6953
			Date - 7-6-2022						



دائره 23 کے لئے رجسٹریشن کے لئے ناموں کی فہرست

Serial No.	Address & Post Code	Letter No.	Date	Name and Address	Remarks
(1)	6592	(1P)		3) 6565-67	(3P)
(2)	6518	(1P)		5) 6581-82	(2P)
(3)	6621	(1P)		3) 6544-45	(1P)
(4)	6568 with			1) 6661	(1P)
(5)	6612	(2P)		5) 6688-89	(2P)
(6)	6538-40	(3P)		13) 6610-11	(2P)
(7)	6534-37	(2P)		1) 6687	(1P)
(8)	6608	(2P)		2) 6642	(1P)
(9)	6568	(1P)		2) 6529-31	(3P)
(10)	6628	(3P)		3) 6627	(1P)
(11)	6544	(2P)		1) 6641	(1P)
(12)	6579	(1P)		1) 6663	(1P)
(13)	6569	(2P)		1) 6622	(1P)
23-06-2022					1) 6655-56

11/20

سندھ پولیس ڈویژن، سندھ ہائیویے ڈیپارٹمنٹ، سندھ ہائیویے ڈیپارٹمنٹ، سندھ ہائیویے ڈیپارٹمنٹ



ANNEXURE TO ROAD CERTIFICATE (10-17)

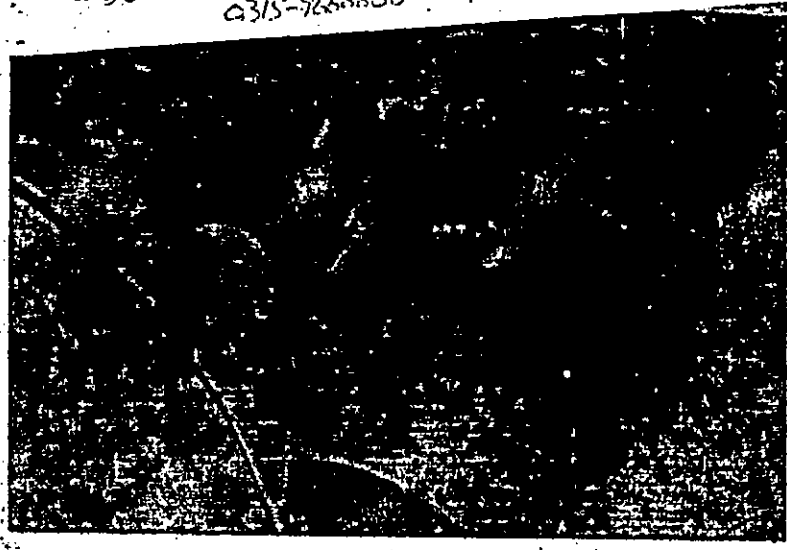
Td: Investigation, S.No. 187

Suabi 23-05-2022

Section	Lab. No.	No. Of Particles	Section	Lab. No.	No. Of Particles	Section	Lab. No.	No. Of Particles
FA	5893-94	2	FA	(6157-58)	2	CE	5749-52	4
	5895-96	2		(4184)	-		5744-45	2
	6383-85	3		6200-3	0		6800	1
	6397-98	0		5813-14	2		5732-43	6
	1615-16	0		(6212-13)	2		5562-64	3
	2583-85	3		(5431)	-		6393-98	6
	6641	1		6059-60	2		6518-19	2
	6233	1		(5938)	2		5566-67	2
	6062	1		(6406)	-		5782-83	2
	5810	1		(6587-88)	0		5963-64	2
	5818	1		(1209-10)	-		5559-61	3
	5892	1		6321-22	0		6834-39	6
	5935A	1		6582-91	3		5063-64	2
	5822	1		6488-89	2		5719-72	4
	6064	1		(5053)	-		6915-16	2
	6232	1		6226-27	2		6391-92	2
	6378	1		(6222-29)	3		6522-23	2
	6482	1		(6230-31)	-		5065-66	2
	6395	1		(6319-24)	4		Bluto	1
	6400	1		5921-23	-		5069-70	2
	6490	1		5815-17	3		5745-46	2
	6586	1		(CE-406)	-		6399-400	2
	6661	1	CE	6042-49	2		7144-45	2
	6667	1		6414	1		7045-46	2
	Total	32		Total	26		Total	64
				GRAND TOTAL				132

Name of Focal Person: [Signature]
 Signature: [Signature]
 Date: 23-05-22 Time: 12:45
 0315-9668853

Incharge Suabi Room
 FSL, Peshawar
 PWS No. (FSL) 091 9217251



VAKALAT NAMA

NO. _____/2023

IN THE COURT OF KP Service Tribunal Peshawar

Izhar Ali

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Dept:

(Respondent)
(Defendant)

I/We, Izhar Ali

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court of Pakistan & Syed Noman Ali Bukhari, Advocate High Court** 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 costs.

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. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

Dated 13 / 7 / 2023

(CLIENT)

ACCEPTED

(M. ASIF YOUSAFZAI)

**ADVOCATE SUPREME COURT,
OF PAKISTAN.**

(S. NOMAN ALI BUKHARI)

ADVOCATE HIGH COURT,

OFFICE:

Room # FR-8, 4th Floor,

Bilour Plaza, Peshawar,

Cantt: Peshawar

Cell No. 0302-5548451

0333-9103240

0306-5109438

Hilal Zubair
Advocate.