


FORM OF ORDER SHEET

Court of _____

Appeal No. 1873/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/09/2023	<p>The appeal of Mr. Amjad Saeed presented today by Mr. Muhammad Saeed Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 20.09.2023. Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1873/2023

Amjad Saeed.....(Appellant)

VERSUS

Deputy Inspector General (D.I.G) of Police, Kohat Region,
Kohat and another.....(Respondents)

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-7
2.	Copy of F.I.R	A	8-9
3.	Copy of the order dated 01/12/2022	B	10
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6.	Copy of departmental appeal	E	14-15
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9.	Wakalat Nama		24

Appellant

Through

Dated: 15/09/2023

Muhammad Saeed Khattak
Advocate High Court,
Peshawar.
Cell No. 0333-6272753

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1873 /2023

Amjad Saeed, Ex-Constable No. 90 of Karak District
Police.....(Appellant)

VERSUS

1. Deputy Inspector General (D.I.G) of Police, Kohat Region,
Kohat.
2. District Police Officer (DPO), Karak.....(Respondents)

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974, AGAINST THE IMPUGNED
ORDER DATED 31/08/2023,
WHEREBY DEPARTMENTAL APPEAL
OF THE APPELLANT AGAINST THE
IMPUGNED ORDER BOOK NO. 267,
DATED 06/07/2023 WAS DISMISSED.

Prayer in appeal:

*On acceptance of the instant appeal the
impugned orders may very graciously be set aside
and the appellant may kindly be reinstated on the
post with all back benefits.*

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Respectfully Sheweth:

1. That the appellant was appointed as Constable in the respondents department on 01-06-2006 and then served the department whole heartedly without any objection on his part towards his obligations.
2. That the appellant along with one other was charged in FIR No. 540 dated 27/10/2022 u/s 324/ 353/ 427/ 34 PPC, 17-AA, Police Station YKS Takhti Nasrati (Karak). (Copy of F.I.R is attached as annexure "A").
3. That the appellant was arrested and thereafter was released on bail by the learned Additional Sessions Judge Karak at Takhti Nasrati.
4. That the appellant was suspended and then Vide OB No. 639 dated 01/12/2022 was dismissed from service. (Copy of the order dated 01/12/2022 is attached as annexure "B").

5. That the appellant's departmental appeal against the order dated 01/12/2022 was allowed in terms of his reinstatement subject to the conduct of denovo inquiry only vide order dated 31/01/2023. (Copy of the order dated 31/01/2023 is attached as annexure "C").

6. That the department thereafter fulfilling the formality to inquiry awarded him the major penalty of compulsory retirement vide order OB No. 267 dated 06/07/2023. (Copy of OB No. 267 dated 06/07/2023 is attached as annexure "D").

7. That being aggrieved of the same the appellant preferred a departmental appeal which was numbered as No. 8377 on 03/08/2023, wherein his involvement in the criminal case was fully discussed. (Copy of departmental appeal is attached as annexure "E").

8. That respondent No. 1 vide impugned order dated 31/08/2023 rejected the departmental appeal without any legal justification. (Copy of the

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impugned order dated 31/08/2023 is attached as annexure "F").

9. That being aggrieved of the same the appellant prefers the instant service appeal, inter-alia, on the following amongst others:

GROUND:

- A. That the appellant has not been treated in accordance with law nor equal protection of law has been extended to him.
- B. That mere allegations of commission of an offence and registration of FIR against the person would not ipso facto declare him guilty and would be presumed to be innocent unless and until he is convicted by competent Court of law and the employee/.civil servant can only be suspended and could not be dismissed from service.
- C. That the statement of the appellant as well as questionnaire before the Inquiry Officer was quite convincing but the same were not considered due to

the reasons as mentioned by him in his statement as well as in his departmental appeal. (Copies of the inquiry are attached as annexure "G").

D. That the appellant served the department for 17/18 years wherein no such like activities have been reported against him, therefore, mere allegations leveled against him for the reason mentioned in the statement and departmental appeal of the appellant.

E. That the so-called inquiry is one sided where the statement of appellant as well as questionnaire has never been discussed nor considered neither by Inquiry Officer nor by the authorities while passing the impugned orders. All the impugned orders have been passed in a cursory manner and no proper procedure was following before passing these orders.

F. That on 27/10/2022, the appellant was on his way to duty when he reached to metal road Madina Patrol Pump Lakari Banda, then he saw an accident between white colour car and police van people were

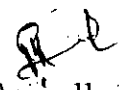
6

gathered there when he reached there the police officers arrested him and later on charged him in the Case/ FIR mentioned above the appellant was not involved in the same and this fact is clear from CCTV recording of Al-Madina Petrol Pump. The recording was also handed over to the authorities but has not been considered nor discussed.

- G. That the matter is also pending adjudication before the competent Court wherein the appellant has already been granted bail and charge has been framed against him, the authorities were under legal obligation to wait for the decision of the case and then to decide the fate of the appellant.
- H. That any other ground can also be taken with permission of this Hon'ble Tribunal during the arguments.

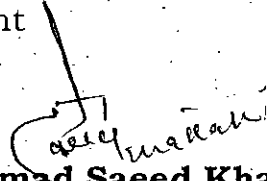
It is, therefore, humbly prayed that on acceptance of the instant appeal the impugned orders may very graciously be set aside and the appellant may kindly be reinstated on the post with all back benefits.

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Any other relief as deemed appropriate in
circumstances of the case, not specifically asked for,
may also be granted to the appellant.


Appellant

Through

Dated: 15/09/2023


Muhammad Saeed Khattak
Advocate High Court,
Peshawar.

قلم نمبر ۱۲۳۵ (۱)

۱۱۴۳۵ ۶۸۱
2-3-11-22

ابتدائی اطلاعی رپورٹ

قابل

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردقہ ۱۵۴ مجموعہ ضابطہ تجدیدی

ملغ کر

۶۱۵

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تاریخ حوثیہ وقوع 27/12/22 قوت 15:30

540

1-	تاریخ وقت رپورٹ 27/12/22 قوت 17:15	قائمہ نمبر (3) 27/12/22 قوت 17:15
2-	نام و سکونت اطلاع دہندہ و مستغیث اور اس کا کیس نمائندگی نمبر	فائل نمبر 3988181-2
3-	تفصیری کیفیت جرم (موقوفہ) حال اگر کچھ لیا گیا ہو	1714-A-34/1577
4-	جائے وقوعہ و فاصلہ قنات سے اور متعلقین اور رشتہ داروں کی تفصیلی فہرست نام و پتوں	324-353-427
5-	نام و سکونت ملزم (اگر معلوم) اور اگر معلومات نہ ہو تو نام و پتوں کے ساتھ	ملزم نام اور پتوں کے ساتھ
6-	کارروائی جو تفتیش کے حلقے کی گئی اگر اطلاع درج کرنے میں توقف یا تاخیر کی وجہ بیان کرے	ملزم نام اور پتوں کے ساتھ
7-	قنات سے روانگی کی تاریخ و وقت	ملزم نام اور پتوں کے ساتھ

ابتدائی اطلاع نیچے درج کردہ - ابتدائی اطلاع میں ملزم نے بیان کیا ہے کہ اس نے 27 دسمبر 2022 کو تقریباً 17:15 بجے اپنے گھر پر ایک شخص کی جانب سے تیزی سے حملہ کیا گیا۔ ملزم نے کہا کہ اس شخص نے اس سے سخت زد کھائی اور اسے زمین پر گرا دیا۔ اس شخص نے اس کے گھر میں داخل ہو کر اس کے گھر میں موجود چیزوں کو لوٹ لیا اور اسے لے کر فرار ہو گیا۔ ملزم نے کہا کہ اس شخص نے اس کے گھر میں موجود چیزوں کو لوٹ لیا اور اسے لے کر فرار ہو گیا۔ ملزم نے کہا کہ اس شخص نے اس کے گھر میں موجود چیزوں کو لوٹ لیا اور اسے لے کر فرار ہو گیا۔

CTE

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2772 LN 1975 (2) 1975 A صہ 22 عدد میگزین 1500 کارٹریج 762 لاٹری ایک عدد
 سری OKAL 223 BORES/A م 03 عدد میگزین، 02 عدد میگزین 30 لاٹری میگزین ایک عدد
 میگزین 01 عدد میگزین 9 لاٹری 02 عدد میگزین، 30 لاٹری 94 عدد فیم میگزین 43 عدد
 1260 عدد کارٹریج 30 لاٹری 06 عدد میگزین 9mm بلہ میگزین 18 عدد میگزین، 02 عدد میگزین
 سری A3469 ایک فیلڈ، 02 عدد میگزین A3435 ایک فیلڈ، 02 عدد میگزین سری MAR 579
 ایک فیلڈ، ایک جوڑا ہولیک ہرنی کھڑے ٹولی پر اسٹریٹ دریاقت اسم پر 2 میگزین 2 میگزین نام ڈیڑھ
 پر اسٹریٹ ہارٹس، 2 عدد ہارٹس اور میگزین ہارٹس مسائیان فونہ مائیکہ ہرٹس 2 میگزین 2 میگزین ہارٹس
 2 میگزین میں صمدی صمدی فرانسٹ آرمی میں جٹا لقصہ ہرنی پان علی علی علی علی علی علی علی علی علی علی
 ہرنی فان آسی میگزین ہرنی 2 میگزین 2 میگزین ہرنی ہرنی ہرنی ہرنی ہرنی ہرنی ہرنی ہرنی ہرنی
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حہ 22 گزاش حہ 20

12

نوم 11 جنوری 11
 عدالت میں اعتراض درج کر فرماؤ گی

MAR 27 - 10 - 022

11-11-2002
 جاہان سیکورٹی کے قتل کیس میں تھرڈ ایڈیشن
 23/11/2002 کے بارے میں تھرڈ ایڈیشن
 نیٹ ورک میں درج کر لیجئے

جان نامیک جو قتل کیس
 21-11-2002
 21-11-2002

23-11-022
 21-11-2002
 اطلاع کے ساتھ کارٹریج اس کی میرا نشان لگایا جائے گا اور اس پر کتنے ابتدائی اطلاع کا نسخہ بطور ثبوت ہوگا۔
 حروف الف ب سرخ روشانی سے باقی

ORDER

This Order will dispose off the departmental enquiry against Constable Amjad Saeed No. 90 (suspended) of this district Police.

Constable Amjad Saeed No. 90 has directly been charged/involved in case FIR No. 540 dated 27.10.2022 u/s 324, 353, 427, 17AA, 34 PPC PS Yaqoob Khan Shaheed. Moreover, Constable Amjad Saeed No. 90 was indicated for stopping at Nakabandi but the said Constable on seeing the Police party, speed up his vehicle and reached to place of occurrence at Lakarki turn wherein Constable hit and tried to damage the Govt. Vehicle as a result of which the Police party strategically arrested him with other co-accused namely Muhammad Yasir s/o Rasool Badshah r/o Khada Banda and registered the aforementioned FIR and recovered 02-Kalashnikov, 01-Kalakov, 01-Repeater, 34-Pistol, 14100-Rounds, and 71-Magazines along-with the Police uniform. This is highly quite adverse on his part and shows his malafide intention, malpractices, and willful breach in the discharge of his official obligations. This act on his part is against service discipline and amounts to gross misconduct.

He was issued Charge Sheet and Statement of Allegations. Mr. Irfan Khan, SDPO B.D.Shah was appointed as Enquiry Officer to conduct proper departmental enquiry against him and he was directed to submit findings in the stipulated time.

The Enquiry Officer reported that Constable Amjad Saeed No. 90 has not provided any kind of evidence and being a part of the discipline force, it is quite adverse on his part to involve in criminal activities which impacts a bad image of the Police force in the general public. It is a shameful act as well as a source of embarrassment for the entire Police force. Therefore, being involved in criminal activities and damaging the Govt. property, the E.O recommended him for an award of major punishment.

Keeping in view the above available record and facts on file, the perusal of enquiry papers, and recommendations of the Enquiry Officer, he is found guilty of the charges. He is a stigma on the Police Force. Being a member of the discipline Force, his involvement in criminal activities and damaging the Govt. property stigmatize the Police department. His further retention in Police Force is no more required. Therefore, in the exercise of the power conferred upon me, I, KHAN ZEB Mohmand, District Police Officer, Karak, as competent authority under Police Rules, 1975 (amended in 2014), hereby impose major punishment of dismissal from service upon defaulter Constable Amjad Saeed No. 90 with immediate effect.

OB No. 639

Dated: 27/11/2022


District Police Officer, Karak

Annex (11)

Dated: 17/02/23

ORDER,

This order will dispose of a departmental appeal moved by Ex. Constable Amjad Saced No.90 of Karak district Police against the punishment passed by DPO Karak vide OB No. 639 dated 01.12.2022 whereby he was awarded a punishment of **dismissal from service** on the allegations of his direct involvement in a criminal case vide FIR No. 540, dated 27.10.2022, U/S 324, 353, 427, 17-AA, 34, PS Yaqoob Shaheed district Karak.

Comments as well as relevant record were obtained from DPO Karak and perused. He has 02 good & 04 bad entries to his credit. He was also heard in person in a room held in this office on 31.01.2023. During hearing, the appellant contended that the enquiry has not been conducted in a proper manner and denied the allegations leveled against him. The enquiry has not been conducted in a proper manner and de-novo enquiry is required to be conducted to meet the ends of justice.

DPO Karak is, therefore, directed to ~~conduct de-novo departmental enquiry by completing~~ all code formalities. Therefore, in exercise of powers conferred upon the undersigned under Police Rules 1975, amended 2014 Rules, Section 11(2), order of ~~dismissal from service~~ is hereby set aside and the appellant is ~~re-instated~~ service subject to the conduct of ~~de-novo enquiry only~~. The enquiry should be conducted and concluded within the prescribed period and must not be prolonged to give any favour to the alleged accused.

Order Announced
31.01.2023

efe

(DAR ALI KHAN) PS
Region Police Officer,
Kohat Region.

Annex (D) (12)

ORDER

This Order will dispose off the de-novo departmental enquiry initiated against Constable Amjad Saeed by the order of the WRPO Kohat Region Kohat vide Order Endst: N 1806/EC dated 08.02.2023.

Facts are that Constable Amjad Saeed No. 90 has directly been charged/involved in case FIR No. 540 dated 27.10.2022 u/s 324, 353, 427, 17AA, 34 PPC PS. Yaqoob Kh Shaheed. Moreover, Constable Amjad Saeed, No. 90 was indicated for stopping at Nakabandi and the said Constable on seeing the Police party, speed up his vehicle and reached to place of occurrence at Lakarki turn wherein Constable hit and tried to damage the Govt. vehicle as a result of which the Police party strategically arrested him with other co-accused named Muhammad Yasir s/o Rasool Badshah r/o Khada Banda and recovered the aforementioned arms and recovered 02-Kalashnikov, 01-Kalakov, 01-Repeater, 34-Pistol, 14100-Rounds and 02 Magazines alongwith the Police uniform. This is highly quite adverse on his part and shows mala fide intention, malpractices, and willful breach in the discharge of his official obligations. The act on his part is against the service discipline and amounts to gross misconduct.

He was issued Charge Sheet and Statement of Allegations. Mr. Irfan Khan, then SDPO B.D.Shah was appointed as Enquiry Officer to conduct proper enquiry against him and to submit his findings within the stipulated time.

The Enquiry Officer reported that Constable Amjad Saeed No. 90 has not provided any kind of proof against himself and being part of the discipline Force, it is quite adverse on his part that he involved in criminal activities which imposed bad image of Police in general public which is not only shameful act but also a source of embarrassment for the entire Police department. Therefore, being involved in criminal activities and damaging the Govt. property of accused Constable Amjad Saeed No. 90 is found guilty and the E.O recommended him for major punishment.

Keeping in view the above available record and facts on file, from the perusal of enquiry papers, and recommendations of the Enquiry Officer, he is found guilty of the charges and he was awarded major punishment of dismissal from service with immediate effect.

Upon which, the said Constable approached and submitted appeal for reinstatement wherein the WRPO vide his office order quoted above reinstated him subject to the conduct of de-novo enquiry only by completing all code formalities.


As per directions, the de-novo departmental enquiry was initiated and Mr. Irfan Khan, the then SDPO Karak was appointed as Enquiry Officer to conduct de-novo departmental enquiry in the light of aforementioned order against Ex-FC Amjad Saeed No. 90 and submit his findings report within the stipulated time.

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The Enquiry Officer reported that accused Constable is indulged in the aforesaid crime and during the course of enquiry, he failed to provide any cogent reason in his defense. Being a member of discipline Force, his involvement in the criminal activities, use of official uniform, and create hurdles in peaceful atmosphere, his retention in the Police Force, cause defamation to the Police Force. His involvement in smuggling of weapons is against the service discipline and amounts to gross misconduct. Therefore, the allegations leveled against him are proved.

In view of the above position explained above, perusal of findings report and adopted all legal and codal formalities, and recommendations of the Enquiry Officer, he is found guilty of the charges. However, putting lenient view upon his family, he is awarded major punishment of compulsory retirement from service with immediate effect.

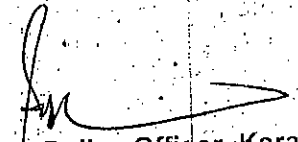
OB No. 267
Dated: 06/07/2023


District Police Officer, Karak
A

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

No. 2766 /Enq, Karak the dated 06/07/2023.

Copy of above is submitted to the Regional Police Officer, Kohat Region Kohat w/r to his office order quoted above: for favour of information, please.


District Police Officer, Karak
A



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Annex E

5233

2/8/22

To The Deputy Inspector General of Police,
Kohat Region Kohat

Subject, Appeal for Re- instatement in Service in respect of
Ex-Const :Amjad Saeed (Constable No .90)

Service appeal against order book NO 267 Dated 06-07-2023 issued
Distric Police Officer, Karak which is awarded major punishment
compulsory retirement from service.

Respectfully Sheweth:

1. That the petitioner serving in police department from the last 17/18 years and also carry out/ deputed the duty different check post and police station on those date the petitioner was on duty in police station karak city , on dated 26-10-2022 petitioner come out from police station to his house on one day leave/ shahashi.
2. On 27-10-2022 the petitioner went to his duty when he reached to metal road. medina petrol pump Lakarki Banda mean while people gathered to the accident of one white colure car and police along with vehicle on the spot I meet with driver of police vehicle and we both along with other constables went to the accident place which is very much clear CCTV record of al-medina petrol pump.
3. That the SHO PS YKS also be present near accidental car.
4. That SHO PO YKS charged the petitioner on personal gorgeous mollified intentionally deliberately and concentration , because the SHO PS YKS was charged in one of FIR on year 2013/2014 on moral turpitude . on those days Mr Attiq Ullah Wazir was the DPO of District karak and the petitioner was duty carry out on his personal guard. that the SHO PS YKS alleged falsely legation you petitioner given total against me to Attiq ullah wazir . On that basis the opportunity/ chance meet to SHO on dated 27-10-2022 charged the petitioner instance FIR. That the petitioner joined investigation magistrate send the petitioner to central jail/ judicial lock up and honorable Peshawar high court Bannu Banch release the accuse petitioner on bail on basis of further inquiry . During those days Department initialed departmental inquiry in the absences of applicant and awarded major Punishment of dismissal from service without recorded any statement, neither the applicant asked to appear before the DPO karak for hearing

EC
23/05

8377
03/8/22

DPO Karak
For comments & provide his
S/Recd/enquiry File.

Signature
3/8

CTC
Signature

15


5. That when the applicant release on bail he submitted appeal before your good office which been admitted and set aside the impugn ordur of DPO Karak OB No 267 dated 06-07-2023 vide your good office order No 2766 dated 06-07-2023 photo copies attached.
6. That the petitioner re-instate and carry out his duty at police station shaslim ,while inquiry officer conducting de novo inquiry against the applicant without collecting any cogent reason/ avoidance and recommended him for major punishment. In this regard - DPO karak has awarded major punishment of compulsory retirement from service without appearing before t he District Police Officer, and order announce vide OB No quoted above.

GROUNDS:

- A. That the Order of DPO Karak is against law, facts and record of the case, hence untenable.
- B. That the petitioner is well obedient and till now during services no illegal practice and corruption allegation against me.
- C. That the Honorable additional Session Judge framed charged against the petitioner in instant FIR, while as per law when the competent court framed charged against the accuse, Department have initiate departmental inquiry against the petitioner which is not authorize to given penalty as per (PLC 2019 SC Page 255) photocopy attached for perusal.
- D. That in the said impugned order violated the basic rights of petitioner,
- E. That the SHO PS Takht-e- Nasrati have not come to Enquiry Officer, with clean hand the said order suffer from gross miss- reading and non reading of application.
- F. That the learned Enquiry Officer has fallen into serious errors of law and facts, while awarded major punishment of compulsory retirement from service.
- G. That finding of the Enquiry Officer, suffer from material irregularity and illegality and therefore, warrants interference by the Honorable Court.

It is therefore, prayed that on acceptance of the service appeal, order of the District Police Officer, Karak issued vide Order Book No 267 dated 06.07.2023 may kindly be set aside and service appeal of the petitioner may be accepted with all back benefit on the basis of the above actual fact please.

Dated 03/08 /2023


Amjad Saeed Ex Constable No.90

03469770697



16
Amjad F

ORDER

This order will dispose of the departmental appeal preferred by **Ex-Constable Amjad Saeed No. 90** of Karak district Police against the order of District Police Officer, Karak whereby he was awarded major penalty of **compulsory retirement from service** vide OB No. 267, dated 06.07.2023. Brief facts of the case are that the appellant was awarded major punishment of dismissal from service vide DPO Karak OB No. 639, dated 01.12.2022 on the allegations of his involvement in a criminal case vide FIR No. 540, dated 27.10.2022 U/S 324, 353, 427, 34 PPC, 17-AA PS Yaqoob Khan Shaheed. Moreover, 02 Kalashnikov, 01-Kalakov, 01-Repeater, 34-Pistol, 4100-Rounds and 71-Magazines alongwith Police uniform were also recovered from his possession. The appellant preferred a departmental appeal before this forum, which was conditionally accepted and he was reinstated into service by the then Regional Police Officer, Kohat vide order Endst: No. 1806/EC, dated 08.02.2023 for the purpose of conducting denove enquiry.

Proper denove departmental enquiry proceedings were initiated against him and SDPO Banda Daud Shah Karak was nominated as Enquiry Officer. The appellant was served with Charge Sheet and Statement of Allegations. The Enquiry Officer after fulfillment of codal formalities submitted his findings wherein the appellant was found guilty of the charges leveled against him.

Keeping in view the recommendations of the Enquiry Officer and the above cited circumstances, the delinquent officer was awarded major punishment of compulsory retirement from service by the District Police Officer, Karak vide OB No. 267 dated 06.07.2023.

Feeling aggrieved from the order of District Police Officer, Karak, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in the office of the undersigned on 29.08.2023. During personal hearing the appellant denied the allegations leveled against him. However, he could not advance any plausible justification in his defense to prove his innocence.

From the perusal of enquiry file and relevant record, it is patently clear that the appellant has been directly nominated in the above mentioned criminal case. Moreover, huge cache of illegal arms and ammunition have been recovered from his possession. By involving himself in criminal activities, the delinquent officer has rendered himself unfit for retention in a disciplined Law Enforcing Agency. The allegations leveled against the delinquent officer have been established beyond any reason of doubt.

Keeping in view the above, I, **Sher Akbar, PSP S.St, Regional Police Officer, Kohat**, being the appellate authority, do not find any justification, whatsoever, to interfere with the order passed by the DPO Karak. Hence, the instant appeal is hereby **rejected**, being devoid of merits.

Order Announced
29.08.2023

Regional Police Officer,
Kohat Region

No. 9373-74/EC, Dated Kohat the 31/8/2023

Copy forwarded to District Police Officer, Karak for information and necessary w/r to his office Memo: No. 3126/EC, dated 07.08.2023. His Service Record is returned herewith.

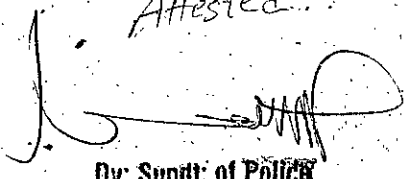
2. ✓ Ex Constable Amjad Saeed No.90 of District Karak.

CTC
[Signature]

بیان ازان کابل احمد سعید عمر ۹۵ مشین ٹھکانہ لکھنؤ فتح پور
 بیان کیا کہ روز سال ۲۰۰۸ سے کلمہ پولیس میں کیمروں کو متاحال بنائیں اور
 امدادی سے اپنی ڈیوٹی سرنگام دے رہے تھے۔ دوران ڈیوٹی کسی قسم کی غفلت اور
 کوتاہی نہیں کی۔ اور نہ ہی امران بالا کو شکایات کا موقع دیا۔
 مزید یہ کہ فوج 26¹⁰ کو میں حسب اجازت ایک دن شاہ باستی رخصت پر ٹھکانہ
 ترک سے کو خود جده بازہ اور فوج 27¹⁰ کو ٹھکانہ ضروریات پورا کرنے کے بعد
 کو خود سے دامپ ہراسٹ کٹ لکھنؤ تاکہ جائے کٹائی ٹھکانہ میں کیمروں
 کو کھولنے کے لئے کہیں ٹکڑی پٹری کے بلیک بلیک پولیس کو لکھنؤ کے خلاف کو کھولنے کے لئے
 پولیس کو لکھنؤ کے طرف جار پولیس کا حیرت سا کہ وہ کھلائی ہو کر تھے سرگرمی ہاؤس
 میں بیٹھا ٹھکانہ لکھنؤ جان سٹیڈ مل گیا۔ لکھنؤ تھے مسلم پتہ کارم میسر سے
 طرف فوج عدت 24¹⁰ فوج 27¹⁰ جسے 17AA-34، 324-353-427-17AA-34، 15AA-34، 30KSS
 راج کوئی۔ اور ناچار تھے مقدمہ میں ملوث کیا۔ لکھنؤ جہاں عدالت کے
 جیل کے پھانسیا۔ دوران کٹائی تھے کسی قسم کی غفلت کا موقع نہیں دیا۔
 آخر میں سے اس ٹکڑی پٹری کے پتہ کے +v سے کیمروں کے پٹریوں کو کھول دیا۔
 عد میں کٹ لکھنؤ کے طرف سے سیرا و فوج کی طرف پٹریوں کے آٹا صاف
 لائیں۔ اور اپنی کوتاہی کے خاطر (cc. 7-v) کیمروں کے پٹریوں کو کھول دیا۔
 میں کٹ لکھنؤ۔ شاہدی شدہ بال کے دائرے کے - 17/13 سال طویل المدتی
 لکھنؤ سندھ سے۔ اور لکھنؤ کا واحد کٹیل کٹیل۔
 اس کے عظیم میسرے حال پر رحم و مہربانی کے ساتھ عدالت مقدمہ میں پٹریوں کو کھول دیا۔

ب میرا بیان 2
 15-03-2023

کے
 لکھنؤ

Attested

 Dy. Supt. of Police
 Karak

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xx - جی پورے 27¹⁰ 2022 کو جو سو عمر وراثت پروردگار نے بے لکڑی فود سے پیرائے ہوئے تھے تاکہ
خانہ تعمیرات کا کام جاری رکھا جائے اور نہ تو کوئی پرول ملے نہ ہیچ کر پولس توئی کے ساتھ حالات
معلوم کرنے کی خاطر پولس توئی کی طرف جا کر پولس توئی کا حصہ سے ساتھ بیکری کی
کرتے سرکاری گاڑی میں بیٹھا کر ۲۳ بجے - بعد میں جی معلوم ہوا کہ صرف
خلف درج بالا مقدمہ جیم رہیں کی تھی -

- x - پولس توئی میں سس سس نے آپ کے ساتھ بیکری کی -
- xx - جی وکیم خان SHO کے ساتھ بیکری ہوئی
- xx - SHO حکیم خان کے ساتھ بیکری ہوئی - وجہ کیا تھی

xx - جی میں جیل انری DPہو کر مسٹری آف ڈیولپمنٹ ڈیپارٹمنٹ کے ساتھ تھا - اس وقت
SHO مذکورہ کے ساتھ ساتھ / ڈیپارٹمنٹ کی جیل رہی تھی اس وقت سے جب کہ اور SHO کے پاس
ناظر تھا - جب میں جیل / پوسٹ بالا جانے وقوع نہیں تو SHO حکیم خان نے تھے
اس وقت میں SHO ہوئے - اس میں آپ کو ملحق ہوں -

- x - حکیم خان SHO کی ڈیپارٹمنٹ تو DPہو مسٹری آف ڈیولپمنٹ کے ساتھ تھی پھر آپ دونوں کے
مابین کس یا ڈیپارٹمنٹ پیدا ہو گیا -
- xx - جی حکیم خان کو تنگ تھا کہ آپ صرف مسٹری آف ڈیولپمنٹ DPہو کر کو سبازش
کرتے تھے -

x - بقول آپ کے حکیم خان SHO نے جو سے ماچھے سنسنے کے لیے صرف عدتہ درج کے
سین آئی بی کے اندر میں درج والویشن / ڈیپارٹمنٹ کا روبرو کارواہ کیا ہے لگے -

xx - جی اس لیے ڈیپارٹمنٹ / موٹر کار کے مسٹری آف ڈیولپمنٹ تھے کوئی علم نہیں -

x - مقدمہ بالا میں شریک ملزم محمد ناصر در رسول بدشاہ سکنہ فرہ یادہ کو آپ
جانے تھے -

محمد ناصر در رسول

محمد ناصر در رسول

۱۰

۱۰ - در مورد ...

۱۱ - در مورد ...

۱۲ - در مورد ...

۱۳ - در مورد ...

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۲۰ - در مورد ...

۲۱ - در مورد ...

۲۲ - در مورد ...

۲۳ - در مورد ...

۲۴ - در مورد ...

۲۵ - در مورد ...

(9)

xx د - جی جوتھو حکیم خان SHO کے صالوں پیرتھ جنس۔ اسلے اس صالوں صالوں کر دی
بیانات دئے ہیں۔

x د - جی اس کے صالوں جنس جو اسلے واپس لائے SHO حکیم خان کے پیرتھ کی ہے۔ اسلے اس کی حالت
کوئی

xx د - جی اسلے واپس لائے کی حالت کے بارے میں کوئی علم نہیں ہے۔

x د - جی اس کے صالوں میں اس کے صالوں سازش ہے۔

xx د - جی بالکل صالوں سازش ہے۔

4 د - جیل اسلے SHO حکیم خان نے اس کے صالوں کوئی سازش کی ہے / یا صالوں واپس
جرح کی ہے۔

xx د - جی اس سے اسلے SHO حکیم خان کو اس کے صالوں سر ایام صالوں لیا

x د - نفسی و دیگر صالوں و واقعات کے مطابق اس کو صالوں یا صالوں صالوں و اسلے
کیا ہے۔ نفسی اسلے حکیم خان SHO کا واپس لائے ہے۔

xx د - جی نفسی اسلے صالوں نہ صالوں سے کوئی بیان لیا ہے۔ اسلے صالوں صالوں کی صالوں لیا ہے۔ اسلے
اسلے صالوں سے کیا فی صالوں کی ہے۔

x د - اسلے صالوں صالوں، دیگر نفسی صالوں سے اسلے صالوں صالوں ہے۔

xx د - جی میں صالوں صالوں

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CTC
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تعمیر

تعمیر ۱۱ روز باقیمانده ۲۶-۱۰-۲۲

کار

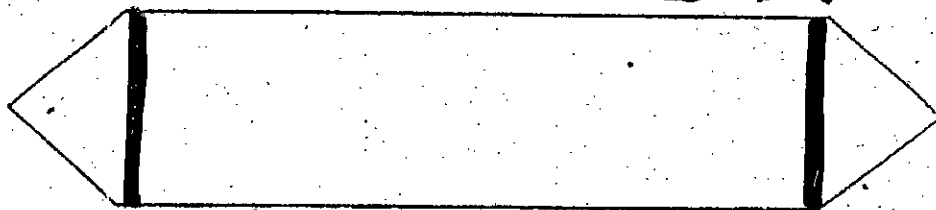
تعمیر ۱۱ روز باقیمانده ۲۶-۱۰-۲۲
کلیه کتب و اسناد موجود در کتب خانہ
کتابخانہ کتب و اسناد موجود در کتب خانہ
کتابخانہ کتب و اسناد موجود در کتب خانہ

تعمیر ۱۱ روز باقیمانده
۲۶-۱۰-۲۲

Attested
Deputy Supt: of Police
MRS. K. K.

تعمیر

بجدرالت



2023 منجانب ایس ایس ڈی
محمد سعید بنام DIG وکٹس

موزونہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ بشدرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دیکل کارروائی متعلقہ
آن مقام اسٹور کیلئے محمد سعید صاحب کی کارروائی کا کمال اختیار ہے
مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثلثت فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک در و سپیاء عرضی 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 منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا 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 ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا کالت نامہ گھدیا کہ سندر ہے۔

الرقوم 15 ماہ ستمبر 2023

کے لئے منظور ہے۔

سید

بمقام

CNIC . 14203-2058442-1

BC, BC-11-1889

Mob 03336272753