


# FORM OF ORDER SHEET

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

Appeal No. \_\_\_\_\_

2450 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/11/2023	<p>The appeal of Mr. Muhammad Khan resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai 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. 2450/2023

Muhammad Khan

VS

Police Department

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THROUGH:

APPELLANT



**TAIMUR ALI KHAN**  
**(ADVOCATE HIGH COURT)**

Cell# 0333-9390916

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

SERVICE APPEAL NO. 2450 /2023

Muhammad Khan, Ex-ASI,  
Police station MRS, Kohat.

**(APPELLANT)**

**VERSUS**

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Kohat Region, Kohat.
3. The District Police Officer, Kohat.

**(RESPONDENTS)**

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**APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974  
AGAINST THE ORDER DATED 16.08.2023, WHEREBY  
MAJOR PUNISHMENT OF DISMISSAL FROM  
SERVICE WAS IMPOSED UPON THE APPELLANT  
AND AGAINST THE ORDER DATED 13.11.2023,  
WHEREBY THE DEPARTMENTAL APPEAL OF THE  
APPELLANT HAS REJECTED FOR NO GOOD  
GROUNDS.**

**PRAYER:**

**THAT ON THE ACCEPTANCE OF THIS APPEAL, THE  
ORDER DATED 16.08.2023 AND 13.11.2023 MAY  
KINDLY BE SET ASIDE AND THE APPELLANT MAY  
BE REINSTATED INTO HIS SERVICE WITH ALL  
BACK AND CONSEQUENTIAL BENEFITS. ANY  
OTHER REMEDY, WHICH THIS HONORABLE  
TRIBUNAL DEEMS FIT AND APPROPRIATE THAT,  
MAY ALSO, BE AWARDED IN FAVOUR OF  
APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was appointed in the respondent department as Constable in the year 1995 and was promoted to the rank of ASI after completing completed mandatory training and courses. The appellant since his appointment has performed his duty with great devotion and honesty, whatsoever assigned to him and due to excellent performance number of commendation certificates along with cash rewards was awarded to the appellant by his superiors. **(Copy commendation certificates are attached as Annexure-A)**
2. That the appellant while performing his duty in such capacity, charge sheet along with statement of allegations were issued to the appellant on baseless allegation of link with drug peddlers and outlaws without specification of any occurrence. The appellant submitted proper reply to the charge sheet in which he denied the allegations and clearly mentioned in his reply that he took against all the accused according to law which is on record and has no contact with drug peddlers and outlaws and baseless allegation was leveled against him. **(Copies of charge sheet along with the statement of allegations and reply are attached as Annexure-B&C)**
3. That inquiry was conducted against the appellant in which statement of any person was not recorded about the allegation nor gave opportunity of cross examination to the appellant if any person recorded his statement, but despite the inquiry officer found him guilty on presumption basis. **(Copy of inquiry report is attached as Annexure-D)**
4. That show cause notice was issued to the appellant which was replied by the appellant in which he mentioned that the reply submitted by him in response of charge sheet is his reply to the show cause notice and once again denied the allegation. **(Copies of show cause notice and reply are attached as Annexure-E&F)**
5. That on the basis of baseless allegation, the appellant was dismissed from service vide order dated 16.08.2023. The appellant being aggrieved from dismissal order dated 16.08.2023 filed departmental appeal on 27.08.2023, which was rejected on 13.11.2023 for no good grounds. **(Copies of dismissal order dated 16.08.2023, departmental appeal and rejection order dated 13.11.2023 are attached as Annexure-G,H&I)**

6. That the appellant now wants to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

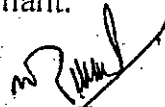
**GROUND:**

- A) That the impugned orders dated 16.08.2023 and 13.11.2023 are against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That in charge sheet and statement of allegations it was alleged on the appellant that you while posted at PS MRS is alleged to have link with drug peddlers and outlaws without specification of any occurrence or mentioned names of drug peddlers and outlaws with the appellant was allegedly having links and relationship, which means that baseless allegation was leveled on the appellant and on the basis of that baseless allegation the appellant was dismissed from service, which is against the norms of justice and fair play.
- C) That no proper and regular inquiry was conducted against the appellant as no statement was recorded of any person about the allegation during the inquiry proceeding nor gave opportunity of cross examination to the appellant if any person recorded his statement, which is violation of law and rules and such the impugned order is liable to be set aside on this ground alone.
- D) That in the inquiry report as well as in the impugned dismissal order dated 16.08.2023, it was mentioned that from CDR the accused (appellant) official were in contact with drug peddlers and outlaws, but no mobile number of drug peddlers or outlaws has been cited in the dismissal order or in inquiry report with whom the appellant was having alleged links and relationship. Thus only reference of the CDR and not mentioning mobile number of the drug peddlers and outlaws is not sufficient for punishment of the appellant, which means that the appellant was punished on presumption basis which is not permissible under the law.
- E) That when valid evidence/substance was not found against the appellant on the allegation by the inquiry officer, then the inquiry officer gave his finding that from secret and reliable/credible source it was found that the appellant has contact with the drug peddlers, but as per judgment of superior courts judgments, no one can be punished on the reference of secret sources. Hence the punishment awarded to the appellant is not maintainable and liable to be set aside.
- F) That the inquiry officer mentioned in his inquiry report that the appellant has more than one mobile number on his name, the

objection raised by the inquiry officer regarding more than one number on the name of the appellant is no legal objection and such point cannot be made a ground of punishment to the appellant.

- G) That the appellant has right of fair defence under Article-10-A of the Constitution of Pakistan which was not observed by the inquiry officer during inquiry proceeding, which is clear violation of Article-10-A of the Constitution of Pakistan.
- H) That the appellant clearly denied the allegation leveled against him in his reply to charge sheet, but without observing the reply charge sheet of the appellant and without conducting regular and proper inquiry, the inquiry officer found him guilty, which is against the norms of justice and fair play.
- I) That no single evidence was collected by the inquiry officer against the appellant about the allegation during inquiry proceeding, but despite that the appellant was found guilty by the inquiry officer, which is against the norms of justice and fair play.
- J) That the appellant has not been treated in accordance with law and rules and has been condemned unheard throughout.
- K) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that on the acceptance of this appeal, the orders dated 16.08.2023 and 13.11.2023 may kindly be set aside and the appellant may be reinstated into his service with all back and consequential benefits. Any other remedy, which this honorable tribunal deems fit and appropriate that, may also, be awarded in favour of appellant.



**APPELLANT**  
Muhammad Khan

THROUGH:



**(TAIMUR ALI KHAN)**  
**ADVOCATE HIGH COURT**

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

SERVICE APPEAL NO. \_\_\_\_\_/2023

Muhammad Khan

VS

Police Department

**AFFIDAVIT**

I, Muhammad Khan, Ex-ASI, Police station MRS, Kohat, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.



**DEPONENT**

A 6

# DISTRICT KOHAT POLICE



**Commendation Certificate III**  
is awarded to

IHC Muhammad Khan No. 315

In recognition of

For his good performance during official duty with

Cash Reward of Rs. 500/-

O.B. No. 282

Dated 21-02-2019

District Police Officer  
Kohat



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# DISTRICT KOHAT POLICE



## Commendation Certificate III

is awarded to

IHC *Muhammed Khan P.S MRS.*

In recognition of

*his good performance during duty*

*Cash reward Rs=300/-*

O.B. No. *288-14*

Dated *22-2-2019*

*[Signature]*  
District Police Officer  
Kohat

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# DISTRICT KOHAT POLICE



## Commendation Certificate III

is awarded to

HEC Muhammad Khan P.S MRS

In recognition of

his good performance during duty

Cash reward Rs 500/-

O.B. No.

394

Dated

22.03.2019.

District Police Officer  
Kohat

9  
10

# DISTRICT KOHAT POLICE



## Commendation Certificate III

is awarded to

IHC Muhammad Khan No 315

In recognition of

For his good performance during official duty

with cash reward of Rs. 300/-

C.B. No. 402

Dated 27-03-2019

District Police Officer  
Kohat

(10)

# DISTRICT KHOAT POLICE



*Commendation Certificate III  
is awarded to*

*IHC Muhammad Khan P.S MR S.*

*In recognition of*

*his good performance  
during duty Cash reward Rs21000/-*

O.B. No. 544.

Dated 15-5-2019

*District Police Officer  
Kohat*

DISTRICT KHOAT POLICE



Commendation Certificate III  
is awarded to

IHC Muhammad Khan P. S MRS.

In recognition of

his good performance (Best best officer)  
during the month of may 2019.

Cash reward. Rs 1000/-

O.B. No. 740

Dated 24-6-19

District Police Officer  
Kohat

DISTRICT KOHAT POLICE



Commendation Certificate III  
is awarded to

ASI Muhammad Khan P.S City

In recognition of

His good performance during

Muharram duty 2020, Cash reward  
Rs = 500/-

O.E.B. No. 2007 / P.O

Dated 01-09-2020

District Police Officer  
Kohat

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**CLASS I**

*Granted by*

To Inspector General of Police, Khyber Pakhtunkhwa  
ASI MUHAMMAD KHAN (CHOWKI INCHARGE)

Son of SAMAND KHAN

District KOHAT

in Recognition of GOOD PERFORMANCE IN CASE FIR NO. 324 (ATEI) DATED 25.03.2021 PS MRS

Dated 30/04/2021  
No. 644/PP0

*Amir*  
Inspector General of Police  
Khyber Pakhtunkhwa

**POLICE DEPARTMENT DISTRICT KOHAT**

**OFFICE OF THE DISTRICT POLICE OFFICER**



**DISTRICT KOHAT**

**COMMENDATION CERTIFICATE CLASS-III**

*With Cash Reward Of Rs. \_\_\_\_\_*

Granted to Mr.  
Muhammad Khan<sup>ASI</sup> / C P. D. Mills Area

District Kohat in Recognition of Good Performance of Duties  
in encounter of assailant involved in 3 cases  
of Dociety with murder of P.S City & MRS

OB No

502

Dated:

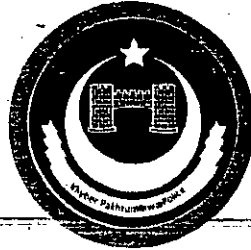
07-10-22

*[Signature]*  
District Police Officer  
Kohat



**POLICE DEPARTMENT DISTRICT KOHAT**

**OFFICE OF THE DISTRICT POLICE OFFICER**



**DISTRICT KOHAT**

**COMMENDATION CERTIFICATE CLASS -III**

With Cash Reward of Rs. \_\_\_\_\_

Granted to Mr. *Muhammed Khan SHO P.S Jungle Khel*

District Kohat in Recognition of Good Performance of Duties  
*and excellent performance.*

*Cash reward Rs=1000/-*

OB No 188  
Dated: 22-2-2023

*[Signature]*  
District Police Officer  
Kohat



No 3071-72/PA

Office of the  
District Police Officer,  
Kohat

Dated 14-6-2023

B (16)

**CHARGE SHEET**

1. **MR. FARHAN KHAN PSP, DISTRICT POLICE OFFICER, KOHAT,** as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **Offg: ASI Muhammad Khan** rendered yourself liable to be proceeded against, as you have omitted the following act/omissions within the meaning of Rule 3 of the Police Rules 1975.

- i. ***You Offg: ASI Muhammad Khan while posted at PS MRS is alleged to have links with drug peddlers and outlaws.***
- ii ***Your above act is bring bad name to the Police department and professional gross misconduct on your part.***

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.

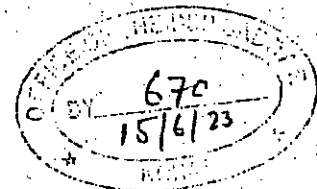
3. You are, therefore, required to submit your written statement within 07 days of the receipt of this Charge Sheet to the enquiry officer.

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.

Received

DISTRICT POLICE OFFICER,  
KOHAT





No. 3071-72/PA

Office of the  
District Police Officer,  
Kohat

Dated 14-6-2023

**DISCIPLINARY ACTION**

1, **MR. FARHAN KHAN PSP, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **Offg: ASI Muhammad Khan** 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. ***You Offg: ASI Muhammad Khan while posted at PS MRS is alleged to have links with drug peddlers and outlaws.***
- ii. ***Your above act is bring bad name to the Police department and professional gross misconduct on your part.***

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations **SDPO Saddar 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. 3071-72/PA, dated 14-6-2023.

- Copy of above to:-
1. **SDPO Saddar Kohat** :- The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.
  2. **The Delinquent official** :- with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

بیان ازان ASI محمد خان متعینہ پولیس لائن کوہاٹ

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جناب عالی!

بحوالہ چارج شیٹ نمبر PA/72-3071 مورخہ 14.06.2023 احکام نمبر S/670 مورخہ 15.06.2023 بحاریہ جناب DPO صاحب کوہاٹ معروض خدمت ہوں کہ چارج شیٹ ہذا میں من سائل کے خلاف بدوران بحیثیت ASHO تھانہ MRS تعیناتی منشیات فروشوں اور غیر قانونی افراد کے ساتھ رابطہ رکھنے کا الزام لگایا گیا ہے حالانکہ من سائل تھانہ MRS اور انچارج چوکی ملز ایریا تعیناتی کے دوران جرائم پیشہ عناصر اور خاص کر منشیات فروشوں کے خلاف ایمانداری سے کارروائی کر کے متعدد مقدمات درج رجسٹرڈ کر کے جن میں بعض منشیات فروش اب بھی ڈسٹرکٹ جیل کوہاٹ میں بند باسلاسل ہے ان کے علاوہ تھانہ جنگل خیل، سٹی میں تعیناتی کے دوران اور دیگر تھانہ جات میں تعیناتی کے دوران بھی منشیات فروشوں اور دیگر غیر قانونی افراد جرائم پیشہ عناصر کے خلاف قانون کے مطابق کارروائی کی ہے جو ریکارڈ بطور ثبوت تھانہ جات میں موجود ہے علاوہ ازیں من سائل نے منشیات فروش کسی ماجد ولد قیس خان سکندہ جی کے خلاف کارروائی کر کے جس سے منشیات ریکوری کر کے مذکورہ کے خلاف مقدمہ درج رجسٹرڈ ہو کر بعد میں ملزم نے من سائل کے خلاف عدالتوں میں بنی بنائی سازش کے رٹ دائر کر کے جو عدالت منجسٹریٹ صاحب نے من سائل کو زیر دفعہ 337L(ii) میں چارج کر کے جس پر من سائل نے نا انصافی کرنے پر شور شرابہ کر کے من سائل کو ڈسٹرکٹ جیل بھجوا دیا گیا ہے اور اب بھی مقدمہ عدالت میں زیر سماعت ہے جس پر من سائل کو ذاتی دشمنی بن چکی ہے ان کے علاوہ بھی من سائل علاقہ تھانہ سٹی اور حدود چوکی ملز تھانہ MRS میں روڈ ڈکیتوں ملزمان کے خلاف کارروائی کر کے جو بھی ریکارڈ تھانہ جات سٹی اور MRS پر موجود ہے۔ جس سے سائل کو ذاتی دشمنی بن چکا ہے۔ من سائل کا یہ سوچ سے بالاتر ہے کہ منشیات فروشوں اور غیر قانونی افراد سے ایسے رابطہ کریں کہ جو محکمہ پولیس کے لئے بدنامی کا سبب بنے۔ انشاء اللہ من سائل کا یہ ایمان ہے کہ نہ تو منشیات فروشوں اور نہ ہی غیر قانونی سرگرمیوں میں ملوث افراد کے ساتھ نہ رابطہ تھے اور نہ ہیں اور نہ ہونگے۔ جہاں تک من سائل کے خلاف الزامات لگائے گئے ہیں بالکل بے بنیاد اور من گھڑت ہیں یہ تمام تر سازشوں کی بنیاد پر ہوتا رہتا ہے اور من سائل منشیات فروشوں اور جرائم پیشہ ورانہ لوگوں پر حلف اٹھانے پر ہر وقت تیار ہے اور روز قیامت کے دن بھی ذمہ دار ہونگا۔ مزید بدوران پیشی افسران بالا صاحبان کو تمام تر حقیقت سامنے بیان کرونگا ان کے علاوہ من سائل نے قبل ازیں بھی ایمانداری اور خوش اسلوبی سے ڈیوٹی سرانجام دی ہے اور دوںگا۔ جن کا تمام تر تھانہ جات میں ریکارڈ بطور ثبوت موجود ہیں اور انشاء اللہ من سائل سے صلح بھر میں کسی اور عہدیدار نے منشیات فروشوں کے خلاف کارروائی نہیں کی ہوگی اور آئندہ بھی خوش اسلوبی اور ایمانداری سے ڈیوٹی سرانجام دوںگا۔

جن منشیات فروشوں اور غیر قانونی افراد کا من سائل کے ساتھ رابطہ تعلق تحریر ہے ان کو چارج شیٹ میں نوٹس نہیں کیا گیا ہے۔

استدعا ہے کہ من سائل کا چارج شیٹ بلا مزید کارروائی کے داخل دفتر فرمایا جائے۔

المرقوم 22.06.2023

دستخط



# از دفتر ایس ڈی بی او صدر سرکل کوہاٹ

فون نمبر: 09229260120

19

21/10/23

444/PA

بخدمت: جناب DPO صاحب کوہاٹ

عنوان: فاسٹنگ ٹھکانہ کاروائی برخلاف محمد خان ASI

جناب عالی!

محالہ مشورہ پابند شیٹ نمبری PA/72-3071 مورخہ 14.06.2023 جاریہ جناب DPO صاحب کوہاٹ سرورس میں کہ محمد خان ASI کے خلاف چارج شیٹ میں ماکہ شدہ الزامات کے بابت من SDPO صدر سرکل نے ذیل کا اضافی انکوائری رپل میں لائی۔

## الزامات:

1. ASI Muhammad Khen, while posted at PS MRS is alleged to have links with drug peddlers and outlaws,
2. His above act is bring bad name to the Police department and professional gross misconduct on your part.

## بیان ASI محمد خان:

انکوائری کے سلسلے میں ASI محمد خان کو طلب کر کے تھیں استاٹیکمانہ کو روٹے چارج شیٹ میں بیان کیا ہے کہ میں میرے خلاف دوران کسٹم ASIHO جناب MRS نصیبائی نشیات فروشوں اور غیر قانونی افراد کے ساتھ رابطے رکھنے یا انرا ہم نوا ہے حالانکہ میں سالک تھا۔ MRS اور انجمن چاک تھیوٹال کے دوران جرم پیشہ خاص اور فیس کوشیات فروشوں کے خلاف ایسا نہ اری سے کاروائی کر کے متعدد مقدمات درج و رجسٹر کر کے جن میں بعض نشیات فروشان اب بھی ڈسٹرکٹ ٹریل میں بند مسائل ہیں ان کے علاوہ تھانہ چکل ٹیل، ٹی میں تھیوٹالی کے دوران اور دیگر قاتلہ جات میں تھیوٹالی کے دوران بھی نشیات فروشوں اور دیگر غیر قانونی افراد، جرم پیشہ خاص کے خلاف کاروائی کے مطابق کاروائی کی ہے جو ریکارڈ ایچور شیٹ تھانہ جات میں موجود ہیں۔

علاوہ ازیں میں سالک نے نشیات فروش کی اجاد ولد قیس خان سکر پل کے خلاف نہ اریوں میں بی بی سارا کے کوٹ اور کر کے جو عدالت مجسٹریٹ صاحب نے سن سالک کو ریزہ نمبر 1-337 میں چارج کر کے جس پر سن سالک نے تصدیق کرنے پر شوشر ابارک کے سن سالک کو ڈسٹرکٹ ٹریل بھجوا کیا اور اب بھی مقدمہ زیر سماعت ہے جس پر سن سالک کو ذالی وٹھنی بن چکی ہے۔ میں سالک نشیات فروشوں اور جرم پیشہ اور لوگوں پر خلاف افغانہ کو بروقت تیار ہے اور ذرا نیات کے دن امی ڈسٹرکٹ دار و عدالت مزید دوران قس افسران بلا صاحبان کو تمام تر حقیقت سامنے بیان کروں گا۔ جہاں تک میں سالک کے خلاف الزامات لگائے گئے ہیں انکس نے جواد اور میں سمجرت ہیں یہ تمام تر سزاؤں کی بنیاد پر ہو رہا ہے۔ یہ میرا بیان ہے۔ (تفصیلی بیان لف بند)۔

## انکوائری آفیسر:

جملہ حالات، واقعات اور سرورس ریکارڈ کی روشنی میں پایا گیا کہ یہ کوہاٹ میں 23.04.1995 کو محکمہ پولیس میں بحال ہوا۔ دوران سرورس نہ کوہاٹ تقریباً 05 نمبر مختلف نوعیت کے الزامات میں نوٹ ہو کر محکمہ سے معطل ہوا ہے اور متعدد دفعہ افسران بالائے جرم پیشہ خاص سکرٹ کے ساتھ روایا، کار سکرٹ میں غفلت، قانون کا لٹلا استعمال اور تباہ کرپشن، اتان یہ رویہ رکھنے، کرپشنل مقدمہ میں نوٹ ہونے اور پولیس سے غیر خاص سکرٹ آہونے پر چارج شیٹ / شو کاؤڈینے میں اور Minor سزا میں دی ہیں جبکہ تیس ازین بھی مذکورہ ASI کو کرپشن، In-efficient پولیس آفیسر اور جرائم الناس کے ساتھ غیر منہ بانہ رویہ رکھنے پر جناب DPO صاحب نے محالہ ASI QB No. 1094/PA کو Written وارنگ اور آفس کے لئے جملہ کاروائی سزا دی تھی اور اسی طرح کرپشنل آفیسر FIR نمبر 771 مورخہ 12.12.2022 جرم 186/189(ii)/506 قاتلہ کیٹ میں نوٹ ہونے پر مذکورہ کو عوارڈ اور سزا نمبر PA 744 مورخہ 15.12.2022 کو معطل کیا گیا۔ (جملہ چارج شیٹ بائے، شو کاؤڈینے اور فیس لف اور قابل ملاحظہ ہیں)۔

ازد فتر ڈی ایس پی صدر سرکل کوہاٹ

464/PA

بخدمت جناب DPO صاحب کوہاٹ

عنوان: فائنڈنگ حکمانہ کاروائی بر خلاف محمد خان ASI

جناب عالی:

بجوالہ مشمولہ شیٹ نمبری PA/22-3071 مورخہ 14.06.2023 مجاریہ جناب DPO صاحب کوہاٹ مفروض ہوں کہ محمد خان ASI کے خلاف چارج شیٹ میں عائد شدہ الزامات کے بابت من SDPO صدر سرکل نے ذیل کاروائی انکوائری عمل میں لائی۔

الزامات

1. ASI Muhammad Khan while posted as PS ,MRS is alleged to have links with drug peddlers and outlaws.

2. His above act is bring name to the Police department and professional gross misconduct on your part.

بیان ASI محمد خان

انکوائری ہذا کے سلسلے میں ASI محمد خان کو طلب کر کے مذکورہ نے چارج شیٹ میں بیان کیا ہے کہ میرے خلاف دوران بحیثیت ASHO تعیناتی منشیات فروشوں اور غیر قانونی افراد کے ساتھ رابطے رکھنے کا الزام لگایا ہے حالانکہ من سائل تھانہ MRS انچارج کی تعیناتی کے دوران جرائم پیشہ من صاحب اور خاص کر منشیات فروشوں کے خلاف ایمانداری سے کاروائی کر کے متعدد مقدمات درج رجسٹرڈ کر کے جن میں بعض منشیات فروش اب بھی ڈسٹرکٹ جیل میں بند سلاسل ہیں۔ اس کے علاوہ تھانہ چنگل خیل سٹی میں تعیناتی کے دوران اور دیگر تھانہ جات میں تعیناتی کے دوران بھی منشیات فروشوں اور دیگر غیر قانونی افراد جرائم پیشہ عناصر کے خلاف قانونی کاروائی کی جائے جو ریکارڈ بطور ثبوت تھانہ جات میں موجود ہیں۔ علاوہ ازیں من سائل نے منشیات فروش مسکی ماجد ولد قیس خان سکنہ کے خلاف عدالتوں میں بنی ہوئی سازش کے رٹ دائر کر کے عدالت مجسٹریٹ صاحب نے من سائل کو زیر دفعہ (ii) 337 میں چارج کر کے جس پر من سائل نے انصافی کرنے پر شور شرابا کر کے من سائل کو ڈسٹرکٹ جیل بھیجا یا اور اب بھی مقدمہ زیر سماعت ہے جس پر من سائل کو ذاتی دشمنی بن گئی ہے من سائل منشیات فروشوں اور جرائم پیشہ لوگوں پر حلف اٹھانے کو ہر وقت تیار ہے اور روز قیامت کے دن بھی ذمہ دار ہوں گا مزید بدوران پیشی افسران بالا صاحبان کو تمام تر حقیقت سامنے بیان کرونگا۔ جہاں تک من سائل کے خلاف الزامات لگائے گئے ہیں بے بنیاد اور من گھڑت ہیں یہ تمام تر سازشوں کی بنیاد پر ہوتا رہتا ہے یہ میرا بیان ہے۔ (تفصیلی بیان ہذا الف ہے)۔

انکوائری آفیسر

جملہ حالات واقعات اور سروس ریکارڈ کی روشنی میں پایا گیا کہ مذکورہ بحیثیت کنسٹیبل مورخہ 23.04.1995 کو محکمہ پولیس میں بھرتی ہوا دوران سروس مذکورہ تقریباً پانچ دفعہ مختلف نوعیت کے الزامات میں ملوث ہو کر محکمہ سے معطل ہوا ہے۔ اور متعدد دفعہ افسران بالانے جرائم پیشہ عناصر / سمگلرز کے ساتھ روابط کار سرکار میں غفلت قانون کا غلط استعمال و تجاویز کرپشن نازیبا رویہ رکھنے کریمینٹل مقدمہ میں موٹ ہونے سے ڈیوٹی سے غیر حاضر ہونے پر چارج شیٹ / شوکار دیے ہیں اور minor سزائیں دی ہیں جبکہ قبل ازیں بھی مذکورہ ASI کو کرپشن In-efficient پولیس آفیسر عوام الناس کے ساتھ غیر مہذبانہ رویہ رکھنے پر جناب ڈی پی او صاحب نے بجوالہ PA/1094 , OB No ASI محمد خان کو Written وارننگ اور آئندہ کے لیے محتاط رہنے کی سزا دی تھی۔ اور اسی طرح کریمینٹل کیس ایف آئی آر نمبر 771 مورخہ 12.12.2022 جرم 86/189 / (ii) 506 تھانہ کینٹ میں ملوث ہونے پر مذکورہ کو بجوالہ آرڈر نمبر PA/744 مورخہ 15.12.2022 کو معطل کیا۔ (جملہ چارج شیٹ ہائے شوکار نوٹسز لف اور قابل ملاحظہ ہیں)۔

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دوران انکوٹری ASI محمد خان کو طلب کر کے الزامات کے بارے میں تفصیلی گفت شنید ہوئی، مگر اس سوالات جوابات میں کوئی لاپرواہی کے

اجواب دینے میں کوتاہی کو ملاحظہ کیا گیا لیکن زبردستی سے مصلحتی طور پر انکوٹری از خود ظاہر کیا کہ میں نے سرکاری ڈیوٹی کے لحاظ سے منشیات فروشوں کو تیز روکے ساتھ رابطہ رکھتے ہیں، علاوہ انہیں مذکورہ کے کراس سوالات و جوابات میں بھی ریکارڈ کے مطابق تصدیق پایا جاتا ہے۔

دوران انکوٹری نے مذکورہ سے اپنا زیر استعمال نمبر 0333-9666548 بتا کر کے جیسا CDR طلب کر کے ملاحظہ کیا گیا جبکہ الزامات

کے متعلق کارڈ نمبر 7-6990003-14202 اپنا خود لکھی تاریخ، 1 ستمبر 2011ء اور 2 یونین سٹریٹ Activate ہیں جو مختلف طریقوں سے ابھی شکاری سے یا کسی اور کے نمبر سے منشیات فروشوں کے ساتھ روابط رکھتے ہیں۔ (CDR رپورٹ لف ہے) تاہم فیصلہ یہ برائے اور Reliable / Credible سروس سے معلوم ہوا کہ مذکورہ ASI کے منشیات فروشان کے ساتھ تعلقات اور روابط موجود ہیں۔

کی گئی انکوٹری سے زبردستی اس نتیجے پر پہنچا کہ ASI محمد خان کے منشیات فروشوں کے ساتھ لگ اور روابط موجود ہیں جو ممکن نہیں کے

لیے بدنامی کا باعث ہے۔ انکوٹری نے ASI محمد خان کو گناہ پایا جاتا ہے۔ لہذا مذکورہ کو مناسب سزا یا طلبہ بد کرنے کی سفارش کی جاتی ہے۔

اس کی ڈی پی او صدر سرنگل  
کوہاٹ

دوران انکوائری ASI محمد خان کو طلب کر کے الزامات کے بارے میں تفصیلی گفت شنید ہوئی کہ اس سوالات اور جوابات عمل میں لائے گئے جواب چارج شیٹ کو ملاحظہ کیا گیا لیکن زیر دستخطی مذکورہ کے جوابات سے مطمئن نہیں ہو بلکہ بدوران انکوائری از خود ظاہر کیا کہ میں نے سرکاری ڈیوٹی کے لحاظ سے منشیات فروشوں وغیرہ کے ساتھ رابطہ رکھے ہیں علاوہ ازیں مذکورہ کے کہ اس سوالات جوابات میں بھی ریکارڈ کے مطابق تضاد پایا جاتا ہے۔

دوران انکوائری مذکورہ نے اپنا استعمال نمبر 03339666548 ظاہر کر کے جس پر سی ڈی آر طلب کر کے ملاحظہ کیا گیا جبکہ الزام علیہ کے شناختی کارڈ نمبر 7-6990003-14202 پر ایک ٹیلی نار سم ایک عدد زونگ سم اور دو یونٹ سم ایکٹو ہیں جو مختلف طریقوں / ہوشیاری سے یا کسی اور کے نمبر سے منشیات فروشوں کے ساتھ روابط رکھتے ہیں۔ (CDR رپورٹ لف ہے) تاہم خفیہ پتہ براری اور Reliable/Credible سورش سے معلوم ہوا کہ مذکورہ ASI کا منشیات فروشان کے ساتھ روابط موجود ہیں۔

کی گئی انکوائری سے زیر دستخطی اس نتیجے پر پہنچا کہ ASI محمد خان کے منشیات فروشوں کے ساتھ لنک / روابط موجود ہیں۔ جو محکمہ پولیس کے لیے بدنامی کا باعث ہے انکوائری اہذا میں ASI محمد خان گنہگار پایا جاتا ہے۔ ہذا مذکورہ کو مناسب سزا یا ضلع بدر کرنے کی سفارش کی جاتی ہے۔

ایس ڈی پی او صدر سرکل

کوہاٹ





OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-920116 Fax 920125

No 4001 /PA dated Kohat the 24/7/2023

**FINAL SHOW CAUSE NOTICE**

1. I, **Mr. Farhan Khan PSP, District Police Officer, Kohat** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, **Offg: ASI Muhammad Khan** 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. 3071-72 /PA dated 14.06.2023.
- 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. **You Offg: ASI Muhammad Khan while posted at PS MRS is alleged to have links with drug peddlers and outlaws.**
- b. **Your above act is bring bad name to the Police department and professional gross misconduct on your part.**

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

صاحب عالی  
-x-x-  
عالم سٹور انٹرنیشنل شوپاز لٹون س، احسان نگر 4501/PA  
مرقم 24/07/23 عمار صاحبہ ڈیپارٹمنٹ پولیس آفیسر و صاحبہ حروف  
شرفت میں۔

آئی سی اے سی انٹرنیشنل شوپاز لٹون س میں جو الزام عائد ہے  
جن کی بابت آئی سی اے سی انٹرنیشنل شوپاز لٹون س میں  
تعمیر کیا ہے، وہیں سے بیان ہے بیان کافی بطور تیز  
میں لکھا ہے۔

دوبارہ واضح کیا گیا کہ اسٹیل جان الزامات کے لئے  
کمان نم ہے جو ہے بنا ہے۔  
مذکورہ دوران میں ایسی صورتیں پیش ہو سکتی ہیں۔

ضلع عالی  
بے نواز جیون اینڈ اسٹور ایچ ایم انٹرنیشنل شوپاز لٹون س  
کا روٹی ہے داخل دفتر فرسٹ اسٹیل جان صاحبہ دعا اور ہے۔

ASi Police Lahore



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT  
Tel: 0922-9260116 Fax 9260125

9  
23

### ORDER

This order will dispose of departmental enquiry against Offg: ASI Muhammad Khan of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Facts arising of the case are that Offg: ASI Muhammad Khan while posted at PS MRS is alleged to have links with drug peddlers and outlaws.

The above act is bringing bad name to the Police department and professional gross misconduct on his part.

For the above, serious / professional misconduct of the accused officiating ASI. Charge sheet alongwith statement of allegations was served upon the accused ASI and SDPO Saddar Kohat was appointed as enquiry officer to scrutinize the conduct of the defaulter ASI. The enquiry officer stated that the allegations / links of the said ASI has been proved with drug peddlers and outlaws, which has been established from CDR and investigation that the accused official were in contact with the drug peddlers and earned a bad name to the entire department. Therefore, the allegations leveled against the defaulter official has been established beyond any shadow of doubt and recommended for punishment.

He was issued Final Show Cause Notice, reply of Final Show cause Notice received and found un-satisfactory. He was also called in O.R, heard in person on 16.08.2023 and did not submit plausible explanation in his defense.

In view of the available record, I agree with the findings of enquiry officer, therefore, in exercise of powers conferred upon me under the rules ibld 1, Farhan Khan PSP, District Police Officer, Kohat is hereby awarded major punishment of dismissal from service with immediate effect, kit etc be collected and report.

Announced  
16.08.2023

~~DISTRICT POLICE OFFICER,  
KOHAT~~

OB No. 679

Dated 16-08-2023

No. 4703-08 /PA dated Kohat the 16-08-2023.

1. Copy of above is submitted for favor of information to the Regional Police Officer, Kohat please.
2. R.I/Reader/Pay officer/SRC/OHC for necessary action.

~~DISTRICT POLICE OFFICER,  
KOHAT~~

THE HONOURABLE DEPUTY INSPECTOR GENERAL OF POLICE  
KOHAT REGION KOHAT

H 29

APPEAL UNDER RULE 11 OF THE POLICE RULES 1975  
(AMENDED 2014) AGAINST ORDER OF THE WORTHY  
DISTRICT POLICE OFFICER KOHAT DATED 16-08-2023  
VIDE WHICH THE APPELLANT WAS DISMISSED FROM  
SERVICE WITHOUT ANY LAWFUL JUSTIFICATION.

EC  
20/8

Respected Sir,

With great respect and veneration, the appellant may graciously be allowed to submit the following for your kind and sympathetic consideration;

Facts of the Case:

1. That the appellant was enrolled as Police Constable on 23-4-1995.
2. That ~~the~~ subsequent to his enrolment as constable the appellant worked hard and successfully qualified the Basic Recruit Course and thereafter also qualified AI, BI, intermediate courses/exams.
3. That on account of qualifying his professional courses and examinations, the appellant with the blessings of Allah "Almighty" promoted from the rank of constable to the rank of LHC and then Head Constable and till the punishment he was serving at the rank of ASI.
4. That since the appellant was performing his duty purely on merits and he was very much active in curbing menace of narcotics, arms and ammunition and anti social elements with bravery and

courage, therefore the appellant became favourite of his respectable officers and resultantly the appellant was assigned a number of sensitive and risky duties which he accomplished satisfactorily and to the satisfaction of his seniors.

5. That on account of his good performance the appellant was awarded a number of commendation certificates coupled with cash rewards.
6. That till the initiation of departmental enquiry appellant was posted in police station MRS which is one of the heaviest police stations of the district.
7. That to the utter surprise of the appellants a show cause notice and statement of allegations were served upon the appellant where-in it was alleged that while posted at P.S. MRS the appellant had allegedly was having links with drug peddlers and out laws and secondly that the alleged act of the appellant was bring bad name to the Police Deptt. and also amounts to professional misconduct on the part of the appellant.
8. That the appellant furnished reply to the charge sheet and the statement of allegations accordingly wherein, the appellant categorically denied the allegations and termed them as false, baseless, incorrect and without foundation however, the competent authority proceeded enquiry against the appellant through the enquiry officer.
9. That during enquiry, the appellant was only once summoned by the enquiry officer wherein upon his direction the appellant submitted his written statement which is enclosed herewith for ready reference.
10. That thereafter, the appellant was served with the Final Show Cause Notice to which the appellant accordingly submitted his

reply and once again denied the allegations. (Copy of reply is enclosed)

11. That ultimately, vide order dt:16-8-2023 the competent authority dismissed the appellant with immediate effect. (Copy of the order is enclosed).

12. That upon the impugned order the appellant has legal and factual reservations.

13. That the legal and factual reservations upon the impugned orders have made it highly doubtful and legally non sustainable; hence it deserves to be set aside in the great interest of law and justice.

14. That following are some of the grounds of appeal among the other which are being detailed for your kind and sympathetic consideration.

Grounds of Appeal:

A. That the impugned order of dismissal from service of the appellant dated 16-08-2023, is not in accordance with law, facts, rules and principles of justice, hence it is not sustainable in the eyes of law and liable to be set aside.

B. That perusal of the charge sheet and statement of allegation would show that it is vague, uncertain and unspecific hence both of them are not operative on the rights of the appellant and no punishment whatsoever can be awarded on the basis of such vague and dubious documents.

C. That, neither the charge sheet nor the statement of allegations have mentioned names of the drug peddlers and outlaws with whom the appellant was allegedly having links and relationship.

(27)

- D. That the charge sheet has not mentioned nature of relationship of the appellant with the drug peddlers and outlaws.
- E. That the charge sheet has also not mentioned mobile numbers of the drug peddlers and outlaws with whom the appellant was having alleged links.
- F. That the charge sheet has also not mentioned that to the drug peddlers and outlaws how much benefit was given by the appellant.
- G. That although the impugned order has referred to the CDR and alleged that links between the appellant and the drug peddlers and outlaws existed but surprisingly no mobile numbers of drug peddlers or outlaws has been cited in the order or by the enquiry officer with whom the appellant was having alleged links and relationship. Thus only reference to the CDR and not mentioning mobile number of the outlaws and drug peddlers is not sufficient for conviction /punishment of the appellant.
- H. That for justifying punishment it is mandatory for the enquiry officers to ascertain mobile numbers of the drug peddlers and outlaws with whom the appellant was allegedly having links and thereafter should have obtained transcript of the alleged conversation between the drug peddlers and outlaws but neither mobile numbers of the alleged drug peddlers and outlaws were ascertained nor transcript of the conversation between the drug peddlers, outlaws has been obtained, hence reference to the CDR is of no use to the punishing authority. Hence only mentioning the name of CDR does not justify punishment to the appellant.
- I. That for awarding punishment, the authority is required to show some substantial evidence against a delinquent official but in this

case not an iota of evidence against the appellant is available. Hence punishment awarded to the appellant cannot be justified.

- J. That the enquiry officer neither recorded evidence of the prosecution witnesses nor provided opportunity to cross examine the witnesses.
- K. That through, mobile number of the appellant were obtained by the enquiry officer but nothing objectionable was traced from the said numbers.
- L. That more than one mobile number issued to the person constitutes no offence unless and until something objectionable is ascertained from such numbers. Hence objection raised by the enquiry officer regarding issue of more than one mobile number in the name of the appellant is of no legal consequence and such a point cannot be made ground of punishment to the appellant.
- M. That when the enquiry officer could not find any substance which could be a valid ground for punishment, he based his findings on the reliable sources and made it the significant grounds of punishment to the appellant which under the universally accepted principle cannot be made a ground of punishment. Hence punishment awarded to the appellant has got no legal sanction.
- N. That if the intelligence agencies were having any substantive evidence against the appellant, their statements were required to be recorded by the enquiry officer. Only reference that from the sources of the intelligence agencies it was known that the appellant was having links with the drug peddlers is not sufficient material for awarding punishment to the appellant.
- O. That the inquiry officer conducted one sided enquiry against the appellant. The appellant was not provided his legal and due right to defend himself during the enquiry proceedings.



P. That conducting unilateral enquiry is also a violation of the Basic Human Rights. Article 10-A of the <sup>Constitution</sup> ~~construction~~ has envisaged that an accused or defaulter has to be ensured just, fair and transparent trial / enquiry.

If entire record is perused, one can safely conclude that enquiry against the appellant was neither fair nor just and transparent. Hence at this score too the impugned punishment order is not sustainable in the eyes of law.

Q. That the appellant has 28 years service to his credit in the Police Deptt. Appellant is conscious to this fact that being members of the law enforcing agency he is not supposed to show the leniency to the antisocial elements. Such elements have to be crushed ruthlessly in the interest of society at large.

The appellant assure your goodself that he has no links with the drug peddlers. The appellant is absolutely innocent.

R. That the punishment awarded to the appellant seems to be the outcome of some misunderstanding.

S. That the impugned punishment has lowered position of the appellant in the eyes of his colleagues, respectable senior officers and among his family members.

T. That no iota of evidence against the appellant exist which could attract the punishment awarded to the appellant

U. That the appellant has large family. The punishment will deprive them the only sources of income and they may be forced to land in starvation and the appellant in such case is likely to sustain irreparable loss.

V. That the charge sheet and the statement of allegations are general in nature and such general allegations cannot be made the basis of punishment.

W. That if deemed proper the appellant may kindly be heard in person.

Prayer:

In view of the above discussion it is humbly prayed / requested that the impugned punishment order of dismissal from service of the appellant dated 16-08-2023 may kindly be set aside being not in accordance with law and principles of justice, unilateral, one sided and being legally defective and not sustainable the eyes of law. Appeal being moved by the appellant may please be accepted and he may be graciously be reinstated in service from date of punishment i.e. 16-08-2023 with all back benefits. The appellant will be highly obliged and he will pray for your long life and prosperity throughout his life for this act of kindness.

Thanking you in anticipation.

6265  
3-1-8-23

Dated: 27-08-2023.

DPS Kohat

In comments provided  
in s/Record/enquiry file.

No. 270  
11-28-23

2023-08-27  
27/08/23

Yours Obediently,

27/08-23

Muhammad Khan (Appellant)  
Ex-ASI, Kohat  
Resident of Noora Killa Sabir Abad  
District Karak.  
Cell No. 0333-9666548.

DSP/L  
27/08/23

27/08/23  
District Police Officer  
Kohat

**ORDER.**

I (31)

This order is in respect of the decision of District Police Officer, Kohat whereby he awarded major penalty of dismissal from service vide OB No. 672 dated 16.08.2023. Brief facts of the case are that the appellant while posted at PS MRS Kohat was proceeded against departmentally to the effect that he had links with drug peddlers and other outlaws. This act of the defaulter has earned bad name for the department which amounts to gross professional misconduct on his part.


Proper departmental enquiry proceedings were initiated against him and SDPO Saddar, Kohat was nominated as Enquiry Officer. The Enquiry Officer after fulfillment of codal formalities submitted his findings wherein the appellant was found guilty of the charges leveled against him. He was, therefore, recommended for penalty under the relevant rules.

Keeping in view the recommendations of the Enquiry Officer and the above cited circumstances, the delinquent officer was awarded major punishment of dismissal from service under the relevant rules by the District Police Officer, Kohat vide OB No. 672 dated 16.08.2023.

Being aggrieved from the order of District Police Officer, Kohat the appellant preferred the instant appeal. He was heard by me personally in my office at District Police Officer's office of the undersigned on 24.10.2023. During personal hearing the appellant did not advance any plausible explanation in his defense.

Foregoing in view, I, Sher Akbar, PSP, S.St, Regional Police Officer, Kohat, being the appellate authority, am of the considered opinion that the charges leveled against him have been established beyond any shadow of doubt. He has rendered himself unfit for retention in a disciplined force. Hence, appeal of Ex-ASI Muhammad Khan is hereby rejected, being devoid of substance and merit.

**Order Announced**  
**24.10.2023**

  
Regional Police Officer,  
Kohat Region

No. 11876 /EC, Dated Kohat the 13 / 11 /2023

Forwarded to District Police Officer, Kohat for information and necessary w/r to his office Memo No. 199/2023 dated 13.11.2023.

Order

This order will be disposed of the departmental appeal preferred by Ex-ASI Muhammad Naeem of District Kohat against the order of District Police Officer Kohat whereby he was awarded major penalty of dismissal from service vide OB No. 872 dated 16.08.2023. Brief facts of the case are that the appellant while posted at PS MRS Kohat was proceeded against departmentally to the effect that he had links with drug peddlers and other outlaws. This act of the defaulter has earned bad name for the department with amounts to gross professional misconduct on his part.

Proper departmental enquiry proceedings were initiated against and SDPO Saddar, Kohat was nominated as Enquiry Officer. The Enquiry Officer after fulfilling of codal formalities submitted his findings wherein the appellant was found guilty of the charges leveled against him. He was, therefore recommended for penalty under the relevant rules.

Keeping in view the recommendations of the Enquiry Officer and the above cited circumstances, the delinquent officer was awarded major penalty punishment of dismissal from service under the relevant rules by the District Education Officer Kohat OB No. 672 dated 16.08.2023.

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 office of the undersigned on 24.10.2023. During personal hearing the appellant did not advance any plausible explanation in his defense.

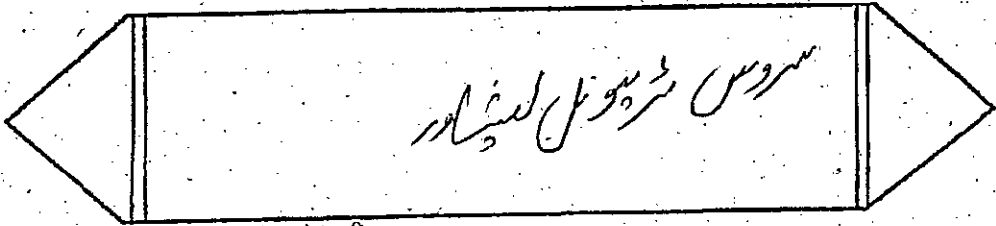
Foregoing in view, I, **Sher Akbar, PSP, S.St, Regional Police officer, Kohat**, being the appellate authority, am of the considered opinion that the charges leveled against him have been established beyond any shadow of doubt, He has rendered himself unfit for retention in a disciplined force. Hence, appeal of **ExW-ASI Muhammad Khan** is hereby rejected, being devoid of substance and merit.

Order announced

No. 11876/EC, dated Kohat the 13/2023

Copy forwarded to District Police Officer Kohat for information. And necessary r/w to his office memo No 6998/LB, dated 12.10.2023 his service record.

## بعدالت



محمد خان بنام ختمہ پولیس  
محمد خان بنام ختمہ پولیس

موزخہ  
مقدمہ  
دعویٰ  
جرم

## باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کا روائی متعلقہ  
آن مقام لیسٹڈ اور کیلئے لکھنؤ میں خان (ڈپٹی لیڈر)  
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 ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور  
باسورت ڈگری کرنے اجراء اور وصولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی  
نیز دائرہ 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 لایا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرداختہ 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  
مذکورہ کریں۔ لہذا ادکالت نامہ لکھد یا کہ سند ہے۔

Accepted  
&  
Attested

20

ماہ

\_\_\_\_\_

واہ العبد

کے لئے منظور ہے۔

\_\_\_\_\_

المرقوم

بمقام