


# FORM OF ORDER SHEET

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

**Appeal No. 2468/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	27/11/2023	<p>The appeal of Mr. Sibghat Ullah presented today by Mr. Muhammad Asif Yousafzai 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  REGISTRAR</p>

**BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.**

**SERVICE APPEAL No. <sup>2468</sup> /2023**

Mr. Sibghat Ullah

V/S

Police Department & others.

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**APPELLANT**

Sibghat Ullah

**THROUGH:-**

*Asif Yousafzai*  
**(M. ASIF YOUSAFZAI)**

**ADVOCATE SUPREME COURT  
OF PAKISTAN.**

*Noman Ali Bukhard*  
**(S. NOMAN ALI BUKHARD)**

**ADVOCATE HIGH COURT  
OF PESHAWAR.**

**&**

**(HILAL ZUBAIR)**

**ADVOCATE PESHAWAR.**

Room No.FR-08, 4<sup>th</sup> Floor,  
Bilour Plaza Peshawar Cantt:  
Cell # 0312-9103240

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

2468  
SERVICE APPEAL No. /2023

Mr. Sibghat Ullah, Ex Senior clerk ,  
CCPO Peshawar .

APPELLANT

VERSUS

1. The AIG/ Head quarter police lines Peshawar
2. The Capital City Police Officer, CCPO Peshawar.

RESPONDENTS

.....  
APPEAL UNDER SECTION-4 OF THE KP  
SERVICE TRIBUNALS ACT, 1974 AGAINST THE  
ORDER DATED 02.05.2023 WHEREBY MAJOR  
PENALTY OF "DISMISSAL FROM SERVICE" WAS  
IMPOSED UPON THE APPELLANT AND  
AGAINST THE REJECTION ORDER DATED  
30.10.2023, WHEREBY, DEPARTMENTAL  
APPEAL OF THE APPELLANT WAS REJECTED  
FOR NO GOOD GROUNDS.

PRAYER:-

THAT ON ACCEPTANCE OF THIS APPEAL, THE  
IMPUGNED ORDER DATED 02.5.2023 AND  
31.10.2023 MAY VERY GRACIOUSLY BE SET-  
ASIDE BEING ILLEGAL, PASSED IN VIOLATION  
OF PRINCIPLE OF NATURAL JUSTICE, HARSH  
AND UNWARRANTED IN THE EYES OF LAW  
AND THE APPELLANT MAY PLEASE BE  
REINSTATED INTO SERVICE WITH ALL BACK  
AND CONSEQUENTIAL SERVICE BENEFITS.  
ANY OTHER REMEDY DEEMS APPROPRIATE  
AND NOT SPECIALLY PRAYED FOR MAY ALSO  
BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWETH:**

**FACTS:-**

1. That the appellant joined the Police Force as Constable in the Year 2006. The appellant has good service record throughout, and performing his duties with the utter dedication and honesty.
2. That the report was submitted by the SI Hamayoon khan on dated 21.06.2022 , wherein , they stated against the appellant, that the appellant issued fake and bogus clearance report of two Afghan citizen, wherein, the DSP Admn security mark it for initiating fact finding inquiry , while they also logged the FIR against the appellant on the same allegations. **Copy of the report and FIR are attached as annexure A.**
3. That the appellant file an application on dated 23.06.2022 for changing the inquiry officer but all in vain the fact finding inquiry was conducted by the same un-trusted and biased inquiry officer. **Copy of the application and fact finding inquiry is attached as annexure B .**
4. That the charge sheet and statement of allegation was issued on dated 30.06.2022 on the basis of same fact finding inquiry. but the charge sheet was not served upon the appellant. **Copy of the charge sheet and statement of allegation are attached as annexure C.**
5. That the regular inquiry was conducted on dated 06.04.2023, wherein statements of the different officials were recorded in absences of appellant and the opportunity of cross examination was also not provided to the appellant , and the inquiry officer give recommendation against the appellant on the basis of surmises and conjecture. **Copy of the regular inquiry report is attached as annexure D.**
6. That in the light of inquiry report the respondent department passed the order dated 02.05.2023, wherein, the appellant was

awarded the major penalty of dismissal from service. Copy of the order dated 02.05.2023 is attached as annexure E.

7. That the appellant feel aggrieved and file the departmental appeal on dated 08.05.2023 against the impugned order but the same was rejected on dated 30.10.2023 without showing any legal justification. Copy of the department appeal and rejection order is attached as annexure F and G.
8. That the appellant having no other remedy therefore now the appellant comes to this august Tribunal on the following grounds amongst the others.

GROUNDS:-

- A. That the impugned order dated 02.05.2023 and 30.10.2023 are against the law, facts, norms of justice, material on record, hence liable to be set-aside:
- B., That the appellant has been condemned unheard as no chance of personal hearing was provided while passing the impugned penalty order.
- C. That even the inquiry was not conducted in a fair manner because, neither any statement has recorded in presence of appellant nor the appellant was given a chance to cross-examine the witness. The miscarriage of justice was done by the respondents.
- D. That the application was filed by the Deputy Public Prosecutor to the learned judicial magistrate in the case of appellant which was register on the same allegation whereby the appellant was dismissed from service. the district public prosecutor stated in the application that as per investigation the appellant namely sibgat ullah who was accused in the same case was innocent there for requested for withdrawn of the criminal case against the appellant, the Para no 3 to 6 of the said application is very much clear that appellant is falsely implicated in such case mentioned in the charge sheet but

despite that the appellant was departmentally held responsible for same allegation which clearly prove that the impugned order was passed mala-fidely and the appellant made escape goat in the instant case to save the skin of responsible person .

**Copy of the application is attached as H.**

- E. That the computer operator "Muhammad nawaz " also stated on oath that on 17.06.2022, that on the date of occurrence of the said case no such entries was made on that day . **Copy of the statement dated 23.06.2022 is annexed as I.**
  
- F. That the order dated 02.05.2023 is void-ab-initio because the order is passed by the incompetent authority, while according to the judgment of the apex court that ' if the order is passed by the incompetent authority the order is void and the further proceedings upon that order is automatically fall down.
  
- G. That the competent authority as well as appellate authority has not used their independent minds while exercising their authorities.
  
- H. That there is no FSL report is available in respect of the signature therefore the inquiry officer held responsible appellant on the basis of surmises and conjecture .further it is added that the inquiry officer not make efforts to dig out real facts for the reason mentioned in para D, above .
  
- I. That during the inquiry proceedings no allegation proved against the appellant but the inquiry officer held appellant responsible on the basis surmises and conjecture which is against the judgment of superior court.
  
- J. That the penalty imposed upon is very harsh especially keeping in view the violation principle of justice and acquitted by the competent Court of Law.


- K. That the appellant has not been treated as per Spirit of Article-10A of the Constitution, and justice.
- L. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

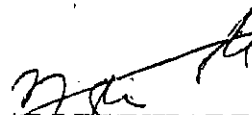
It is, therefore, most humbly prayed that the appeal in hand may be accepted as prayed for.

**APPELLANT**

Sibghat Ullah

**THROUGH:-**

  
**(M. ASIF YOUSAFZAI)**  
**ADVOCATE SUPREME COURT**  
**OF PAKISTAN.**

  
**(S. NOMAN ALI BUKHARD)**  
**ADVOCATE HIGH COURT**  
**OF PESHAWAR.**

**&**

**(HILAL ZUBAIR)**  
**ADVOCATE PESHAWAR.**

**BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.**

**SERVICE APPEAL No. /2023**

Mr. Sibghat Ullah

V/S

Police Department & others.

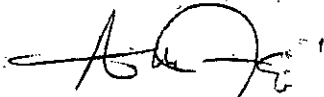
.....  
**AFFIDAVIT**

I, Mr. Sibghat Ullah, Ex Senior Clerk, CCPO Peshawar (Appellant) do hereby solemnly affirm and declare that the contents of this Appeal are true and correct to the best of my knowledge and belief.

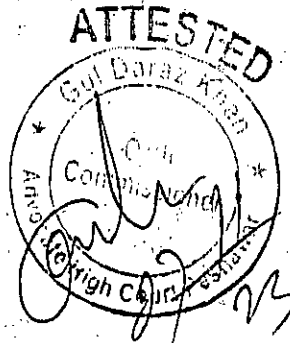
DEPONENT

Sibghat Ullah

IDENTIFIED BY:



(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
OF PAKISTAN.





(7)

21/6/22

الذکر

۱۱۔ یہاں خان سی ۱/۲ وقت ۱۴:۰۰ سے مورخہ ۲۱/۶/۲۲ کے لیے  
 کہ من اجازت کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 منب ۳۳۶، ۳۳۷ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 نقلیات کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 مقصد اللہ کے اجازت کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 امر مقصد اللہ کے اجازت کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 لب لہذا مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 روزانہ بند کے نقل و حرکت کے لیے مورخہ ۲۱/۶/۲۲ کے لیے مورخہ ۲۱/۶/۲۲ کے لیے  
 صورت میں ارسال کی جائے گی۔

مورخہ ۲۱/۶/۲۲  
 ۲۱/۶/۲۲

DSP / Admin Secretary  
 Initiate Fact & Funding Inquiry  
 into this and Report

22/6/22

(۷)

مورخہ ۲۱/۶/۲۲  
 نقل و حرکت کے لیے  
 ۲۱/۶/۲۲  
 ۲۱/۶/۲۲

رپورٹ بمالوک خان TIF وقت ۱۴:۵۵ بجے مورخہ ۲۲/۱۱/۲۰۲۲ء درج ہے۔

آرٹیکل ایف آئی کے پولیس کانسٹیبل سر شفیع  
غبر 537، 538 پولیس طور پر بیان کیا ہے، مزید معلومات  
کرنے پر دفتر میں TIF ڈسک پر نقیحات کنسٹیبل انتظار  
شاہ 528 نے یہ دونوں غیرت صفحہ اللہ ایف آئی کے  
کو بغیر اجازت دیا ہے۔ اور صفحہ اللہ ایف آئی کے  
ان غیرت 537، 538 کے پولیس سر شفیع بتائے ہیں۔  
چونکہ کنسٹیبل انتظار شاہ 528 نے بغیر اجازت یہ کام  
کیا ہے، اس لئے اسے تادیب رپورٹ درج روزنامہ کے  
نقلہ بندس کارڈ کے امیران والا کی طرف سے ارسال  
کی جائے گی۔

مناب عالی  
نقل عطا اللہ امیران والا

(A)

(7)

پولیس ٹارم نمبر 24-15(1)

سیریل نمبر: 001163

ابتدائی اطلاعی رپورٹ نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ ذریعہ دفعہ 154 مجموعہ ضابطہ نو جداری

نمبر: 194/23 قاعدہ: PS. EASTCANTT ضلع: Peshawar ای ٹک نمبر: EC-4/17/2023-352

تاریخ وقت وقوع: 17.6.2022 وقت روز ہفتہ: تاریخ وقت رپورٹ: 21.6.2022 وقت 14:00 بجے

1	تاریخ وقت رپورٹ	عمرالبدن نمبر (26) 17-04-2023 07:40 PM	6	قائد سے رداگئی کی تاریخ وقت	سبکدہ علم
2	نام و سکونت اطلاع دہندہ مستطیت	ہمایون خان SI پتہ: ایمپارن PAL حیات آباد، پشاور پولیس ایسٹ			
3	مختصر کیفیت جرم (معدومہ) دہال اگر کچھ کہہ گیا ہے	جرم:			
		420 تہہ			
		468 تہہ			
		471 تہہ			
		KP POLICE ACT 2017 - 118-			
4	جائے وقوعہ و قاعدہ حاصلہ قاعدہ سے اور سمت	CC برانچ پولیس لائن پشاور			
5	کارروائی مختلف تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہوا ہو تو اس کی وجہ بیان کی جائے	موصولہ جملہ انکوائری کاغذات پر مقدمہ درج رجسٹر کیا گیا۔			

03139833205

ٹیلی فون نمبر:

HC عہدہ:

178

پلٹ نمبر:

ABID ALI

دستخط:

(ابتدائی اطلاع نیچے درج کریں)

بوقت صدر جے جملہ انکوائری کاغذات بدست نیم اکبر SI سے موصول ہو کر جو مضمون ذیل ہے۔ مستطیت مندرجہ خانہ نمبر 2 لے بحوالہ 11 روز نامہ PAL حیات آباد رپورٹ درج روز نامہ کے بغرض کارروائی السمران ہالا کو ارسال کرنے کے جس پر SSP انٹیلی جنس صاحب انکوائری ایسٹریٹیو ہو کر جس پر باقاعدہ انکوائری کر کے جملہ مستطین کے بیانات لینے کے بعد انکوائری پر بات سامنے آئی۔ کہ روز وقوعہ سینٹر کلرک صفت اللہ نے PAL انس کال کر کے کنسٹیبل انکوار شاہ نمبر 5281 نے سینٹر کلرک صفت اللہ کے کہنے پر اسے سیزل نمبرات 538, 537 دیئے۔ جس پر سینٹر کلرک لے دو انخان شہریوں 1۔ دریدہ دختر گل نازک اور 2۔ الہام دریل ولد عدیل دریل ساکنان افغانستان حال مکان نمبر 42، سڑک نمبر 14، سیکٹر 3-E، فیز 7 حیات آباد پشاور کو SP سیکورٹی کے بوگس دستخط سے پولیس کانسٹیبل سر نیکیٹ جاری کئے۔ انکوائری سے ثابت ہوا کہ مذکورہ الہام صفت اللہ نے اختیارات سے تجاوز کرتے ہوئے غیر قانونی طور پر SP سیکورٹی کے بوگس دستخط کر کے انخان شہریوں کو پولیس کانسٹیبل سر نیکیٹ جاری کئے۔ مذکورہ الہام کا اقدام تعزیرات پاکستان اور پولیس ایکٹ 2017 کے تحت قابل سزا جرم ہے۔ جملہ انکوائری کاغذات بغرض کارروائی موصول ہو کر حسب الحکم السمران ہالا بر خلاف لازم صفت اللہ مقدمہ جرم ہالا چاک کر کے تفتیش حوالہ قاضی خورشید SI/INV کیا جاتا ہے۔ بعد جملہ انکوائری کاغذات نقلہ ذیل ہے۔ دستخط انگریزی عابد خان MASI قائد شرعی مورخہ 17.4.2023 نقلہ 11 رپورٹ ہمایون خان SI 1/ C وقت 14:00 بجے مورخہ 21.6.2022 درج جیکے سن ایمپارن کو معلوم ہوا کہ کانسٹیبل سیریل نمبر 538, 537 بوگس طور پر بنایا گیا ہے۔ مزید معلومات کے لئے پرنسٹن ہاؤس TIF ڈسک پر تصویبات کنسٹیبل انکوار شاہ 5281 نے ہر دونوں نمبرات صفت اللہ CC ایمپارن کو بغیر اجازت دیئے ہے۔ اور صفت اللہ CC ایمپارن نے ان نمبرات 538, 537 پر بوگس سر نیکیٹ بنائے ہے۔ جو کہ انکوار شاہ 5281 نے بغیر اجازت پر کام کیا ہے۔ تاہم رپورٹ درج روز نامہ کے نقلہ بغرض کارروائی السمران ہالا کے خدمت میں ارسال کی جائے گی۔

HC ABID ALI

17-04-2023

بیرین 3



خدمت چھابہ DSP کو درخواست میں مہمانی لیکچر  
درخواست گزار جو انکی انکو اثری کسی دیگر معزز آئندہ کو لیکچر لیا جائے

P.A.D.S.  
S: NO: 1685  
Date: 23.06.02

9

چھابہ مہمانی

(B)

تشریح حکام میں کل مجموعہ کے دو کو چھابہ مہمانی کو

139-(PA Coord.)

23-6-02

اردنی رجیم میں بابت شرفی حروفی ویش پراجس میں

پراجس میں ریڈر ایس بی سیکورٹی کے مراعات شامل تھی جس

پر چھابہ مہمانی نے فوری ایکشن لے کر ریڈر ایس بی سیکورٹی

زائد کو 20 سال تعیناتی کے بعد سے تیار کیے گئے احکامات جاری

کیے جس پر چھابہ ایس بی سیکورٹی کو ریڈر زائد کے نہ بنایا گیا

انچارج نے دو عدد فیلڈنس (افغان) بنائے ہیں جو کہ لوگوں میں

چھابہ مہمانی نے اس میں انکو اثری کا حکم دیا۔ چھابہ مہمانی

خان کو سیکورٹی جو کہ ریڈر زائد کے ساتھ مراعات سے محروم ہوئے

ان کی کیا تھی گئی تھی۔ اس پر چھابہ مہمانی نے کہا ہے کہ انکو اثری

بابت پولیس کلرنگ جو ان کے پاس ہے اس پر چھابہ مہمانی نے کہا ہے

ریڈر کا بندہ ہے اور وہ پورے پورے کو شرفی مہمانی کے پاس ہے

والس اپنے سینٹر پر رہتا ہے لیکن چھابہ والا چھابہ مہمانی

نہاں مہمانی پر اثری ہے کہ یہ انکو اثری کے بھی فوری شناس

کو قبول کر جائے اور اس کے بارے میں حقیقت سنا لینی ہے

سر میں پورے چھابہ مہمانی کے کہ وہ دن بھر پورے چھابہ مہمانی کے

رہتا ہے اور اس کے ساتھ ہی رہتا ہے اور اس کے ساتھ ہی رہتا ہے

کے اور اس کے ساتھ ہی رہتا ہے اور اس کے ساتھ ہی رہتا ہے

کیں یہ حال اس وقت آبادی کے ہے اور اس کے ساتھ ہی رہتا ہے

موصول ہو گیا ہے لیکن اس کے ساتھ ہی رہتا ہے اور اس کے ساتھ ہی رہتا ہے

پتہ لگنے جا رہا ہے لیکن اس کے ساتھ ہی رہتا ہے اور اس کے ساتھ ہی رہتا ہے

ماتو شکر اور چھابہ مہمانی کے ساتھ ہی رہتا ہے اور اس کے ساتھ ہی رہتا ہے

DSP HARR  
For inquiry and  
reply plz  
8/23/02



OFFICE OF THE  
DY: SUPERINTENDENT OF POLICE SECURITY,  
CAPITAL CITY POLICE PESHAWAR

60

**SUBJECT: FACT FINDING ENQUIRY AGAINST SIBGHATULLAAH (SENIOR CLERK) I/C CC BRANCH**

**ALLEGATION**

Incharge PAL office Hayat Abad reported vide daily dairy No 11, dated 21/6/2022, that Police Clearance Certificate (PCC) vide serial No 537 & 538 are made bogus/fake. Furthermore, both these two numbers were provided by constable Intezar shah (No 5281 of PAL office Hayat Abad Assigned TIF forms) to Sibghatullah I/C CC branch without the permission/knowledge of Incharge PAL Hayat abad. Incharge CC Branch has made bogus Police Clearance Certificates on these two serial numbers. Also constable Intezar Shah No 5281 provided numbers without his (I/C PAL) permission. F/A

The undersigned was nominated for facts and finding inquiry by respected SP security CCP.

**PROCEEDINGS**

1. Immediately after receiving this report the despatch register of CC branch was demanded and the same was brought by Hayat Iqbal No 275 CC Branch on 21-06-2022 and his statement was recorded and placed on file. The register was taken in to possession and observed the fake entries at 5796/538 & 5797/537 on the name of Ilham Darmal s/o Abdul darmal and Zarmina d/o Gul nazak Afghan Nationals. F/A
2. SI Hamayoun Khan I/C PAL hayatabad disclosed in his statement that he came to know that bogus/forged Police Clearance certificates were issued vide serial No. 537 & 538. He further stated in his statement that constable Intezar shah No 5281 of TIF desk PAL office Hayatabad provided these two numbers to sibghatullah on Phone without bringing in his knowledge. He further verbally stated that he has got a copy of one forged PCC of Ilham Darmal s/o Abdul Darmal from his own source. The copy of that forged PCC

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having bogus signatures of SP Security is placed on file for ready reference. Detail statement is placed on file. F/B

3. Statement of constable Intezar Shah No 5281 is also recorded wherein; he confirmed that he provided two serial numbers 537 & 538 to Sibghatullah I/C CC branch on telephone on 17/06/2022 around 0100 PM. He further stated that Sibghatullah on telephone provided names of two persons which has been interred in the register at serial No. 537 (Zarmina d/o Gul Nazak r/o Afghanistan now at house No. 42, street No. 4, sector E-3, phase 7, Hayat Abad Peshawar) and No. 538 (Ilham Durmal s/o Abdul Durmal r/o Afghanistan now at house No. 42, street No. 4, sector E-3, phase 7, Hayat Abad Peshawar) respectively. Detail statement annexed as F/C

4. Sibghatullah I/C CC branch stated that Police Clearance No 5796 & 5797 (PAL No 537 & 538) relates to PAL office Hayat Abad. SP security signs the PCCs, after giving serial No by them (CC Branch). He further stated that they have the record of only those PCCs which have been made in CC branch. He showed unawareness about PCCs No 5796 & 5797. In his statement he denied the allegations, but did not give satisfactory answers and made cross allegations without any logical proof. Detail statement annexed as F/D.

5. FC Muhammad Nawaz computer operator CC branch stated that he is preparing security planes on daily bases. In his absence other officials are also using the computer of CC branch. Astonishingly contradiction in his written and verbal statement. In his written he said that IHC Tariq, FC Hayat and FC Ishaq are using that computer, while verbally stated that I/C CC Sibghatullah is also using it.

Detail statement annexed as F/E

6. The Superintendent of Police (security) Mr. Salah-ud-din disclosed the signatures as fake & bogus on PCCs issued vide dairy No 5796 and 5797 dated 17-06-2022 in respect of Ilham Darmal s/o Abdul Darmal and Zarmina D/O Gul Nazak r/o house no 42, street No 4,

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sector E-3, phase 7, Hayat Abad Peshawar. He also stated that some dealing hands has done this fake & bogus signature.

Statement at F/F

- A M
7. Ilham Darmal stated that they have sent the documents (including Police clearance certificates) to UK via DHL. He also provides the receipts of DHL. Statement at F/G. He verbally narrated that the PCCs were made for them by their relative Khalid Khan (0335-9988229) r/o behind Zahid Market ring road. Mr Khalid was not answering on phone but on WhatsApp he promised that he will come for statement but in vain. He also promised that he will provide the details of person who made these PCCs for them but failed. WhatsApp recording is available. F/G
  8. Deputy Chief of Protocol, Ministry of Interior, camp office Peshawar was informed about these forged documents both in written and verbal well on time. Annex F/H
  9. During the course of enquiry, it has been learnt that earlier SC Sibghatullah was removed from service with same nature of allegations. Annex F/I
  10. JC Umer Saeed dalry Dispatch clerk stated in his statement that he left the office at around 06:00 PM on 17-06-2022 on the direction of Sibghatullah I/C, as he was transferred. At that time Sibghatullah and operator Nawaz were present in office. F/J
  11. IHC Syed Ijaz Ali Shah 1045 of PAL office Hayat Abad stated that constable Intezar Shah provided two serial Numbers (537 & 538) to I/C CC Sibghatullah, without their permission/knowledge. F/K

#### FINDINGS

Aforesaid recorded statements clearly indicate that Sibghatullah I/C CC branch have prepared/arranged forged/bogus Police Clearance Certificates to Afghan Nationals (Ilham Darmal and Zarmina) with mala fide intentions. More over SC Sibghatullah was removed from service with same nature of allegations in recent past. Constable Intezar Shah of PAL office is also held responsible for delivering important records in the shape of Numbers, without the permission/knowledge of his incharge. It is worth mentioning that for making Police Clearance Certificate total

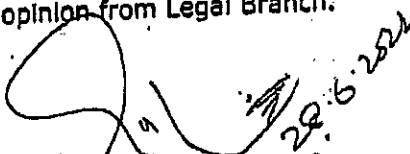
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three numbers labelled on PCC, serial number and data entry number issued/labelled at the office of PAI and final number after signature of competent authority at the office of CC Branch. In this case two numbers were issued but data entry numbers are not labelled/issued to both forged PCCs.

**RECOMMENDATION:**

In view of the above facts and perusal of record/statements it is recommended that

1. Proper departmental proceedings be initiated against Sibghatullah I/C CC branch and constable Intezar shah.
2. Sibghatullah may not be posted at such like key posts.
3. As forgery has been committed/established, therefore a criminal proceeding under relevant sections is also recommended after soliciting opinion from Legal Branch.

  
29.6.2024  
DSP, SECURITY (Admin)  
CAPITAL CITY POLICE, PESHAWAR

♡

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OFFICE OF THE SSP,  
INVESTIGATION, PESHAWAR  
DY: No 4004 /PA  
DT: 30-06-22  
Enclosures: \_\_\_\_\_

OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR  
Phone No. 0919210989  
Fax: 091-9212597

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CHARGE SHEET

1. Whereas I am satisfied that a formal enquiry as contemplated by Government of Khyber Pakhtunkhwa, Civil Servants (Efficiency and Disciplinary) Rules 2011 is necessary & expedient.
2. And whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Government of Khyber Pakhtunkhwa, Civil Servants (Efficiency and Disciplinary) Rules 2011.
3. Now therefore, as required by E & D Civil Servants Rules 2011, I Muhammad Ijaz Khan Capital City Police Officer, Peshawar, hereby charge you Senior Clerk Sibghat Ullah I/C. CC Branch CCP, Peshawar, under E & D Rules 2011 on the allegations mentioned in the enclosed Summary of Allegations:-
4. And I hereby direct you further under E & D Rules 2011 to put a written defence within 07 days of the receipt of this Charge Sheet as to why the proposed action should not be taken against you and also stating at the same time whether you desire to be heard in person.
5. And in case your reply is not received within the specific period, it shall be presumed that you have no defence to offer and ex-parte action will be taken against you.
6. Statement of Allegation is enclosed.

(MUHAMMAD IJAZ KHAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 13-E /PA, dated Peshawar the 21/06/2022.

Copy of the above is forwarded to the Enquiry Officer for initiating proceeding against the above named officer. (Encd: 33 Pages)



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR  
Phone No. 0919210989  
Fax: 091-9212597

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**SUMMARY OF ALLEGATIONS**

1. I. Mohammad Ijaz Khan, Capital City Police Officer, Peshawar am of the opinion that Senior Clerk Sibghat Ullah has rendered himself liable to be proceeded against departmentally, as he committed the following acts within the meaning of under Section 4 of Government Khyber Pakhtunkhwa, Civil Servants E&D Rules-2011.

**STATEMENT OF ALLEGATION**

- i. He while posted as I/C CC Branch CCP Peshawar allegedly involved himself in malpractices by doing fake signatures of the competent authority on Police Clearance Certificates in order to receive illegal gratification from innocent peoples.
- ii. As per written statement of SP/Security, that Police Clearance Certificate in t/o two Afghan Nationals were issued through bogus signatures vide dally diary No. 5796 and 5797 dated 17.06.2022. It has also been learnt that for such certificates he receives Rs.15000/- to 20000/- as bribe per certificate.
- iii) In the recent past he was dismissed from service on similar allegations that he interferes in the affairs of others and filed anonymous complaints against his fellow staff for his choice postings.
- iv) He is a disreputable, villainous, notorious and infamous for using various complaints in Pakistan Citizen Portal for black mailing the staff members.

2. For the purpose of inquiry against the said official with reference to the above allegations an Inquiry Officer/Inquiry Committee consisting of the following is constituted:-

SP (Secy) Peshawar

3. The Enquiry Officer/Inquiry Committee shall in accordance with the provision of the said Rules, provide reasonable opportunity of hearing to the accused, record its findings and make recommendations within 30 days of the receipt of this order, as the punishment or other appropriate action against the accused official.

4. The defaulter official and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the Inquiry Officer/Inquiry Committee.

(MUHAMMAD IJAZ KHAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

OFFICE OF THE  
SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.

Office Ph: No. 091-9210642

No. 1468 /PA, Dated Peshawar the 06/04/2023.

To **The Capital City Police Officer,  
Peshawar.**

Subject: **DISCIPLINARY ACTION AGAINST SENIOR CLERK SIBGHAT ULLAH I/C  
CC BRANCH CCP PESHAWAR.**

Kindly refer to your office Endst: No.13-E/PA, dated 29.06.2022 on the subject cited above.

**STATEMENT OF ALLEGATIONS:**

- i. He while posted as I/C CC Branch CCP Peshawar allegedly involved himself in malpractices by doing fake signatures of the competent authority on Police clearance certificate in order to receive illegal gratification from innocent peoples.
- ii. As per written statement of SP/Security that Police clearance certificate in r/o two Afghan Nationals were issued through bogus signatures vide Diary No.5796, and 5797, dated 17.06.2022. It has also been learnt that for such certificates he receives Rs.15000/- to 20000/- per certificate as bribe.
- iii. In the recent past he was dismissed from service on similar allegations that he interfered in the affairs of others and filed anonymous complaints against his fellow staff for his choice postings.
- iv. He is a disreputable, villainous, notorious and infamous for using various complaints at Pakistan Citizen Portal for black mailing the staff members.

**PROCEEDINGS:**

In this regard, the W/CCPO Peshawar order for conduction of proper departmental inquiry against the alleged official, issued him Charge Sheet & Summary of Allegations and the undersigned was appointed as Enquiry officer.

During the course of inquiry, the alleged official Senior Clerk Sibghat Ullah as well as other staff of CC Branch CCP Peshawar were called to the office to record their statements and heard them in person.

1. **SENIOR CLERK SIBGHAT ULLAH THE THEN I/C CC BRANCH CCP PESHAWAR (F/A)**
2. **SI HAMAYUN KHAN, I/C PAL HAYATABAD PESHAWAR (F/B)**
3. **SI ZAHID KHAN, READER TO SP SECURITY PESHAWAR (F/C)**
4. **SI SAJJAD SIRAJ, LINES OFFICER POLICE LINE PESHAWAR (F/D)**
5. **IHC SYED IJAZ ALI SHAH OF PAL HAYATABAD PESHAWAR (F/E)**
6. **JUNIOR CLERK UMER SAEED THE THEN DISPATCH CLERK, CC BRANCH CCP PESHAWAR (F/F)**
7. **CONSTABLE MUHAMMAD NAWAZ COMPUTER OPERATOR CC BRANCH CCP PESHAWAR (F/G)**
8. **CONSTABLE SYED INTEZAR SHAH NO.5281, OF PAL HAYATABAD PESHAWAR (F/H)**
9. **CONSTABLE FARHAN ULLAH NO.5097, OF PAL HAYATABAD PESHAWAR (F/I)**
10. **CONSTABLE HAYAT IOBAL NO.275, OF CC BRANCH CCP PESHAWAR (F/A)**

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All the above-mentioned officials attended the inquiry proceedings, were heard in person, cross-examined and their statements were recorded except the alleged Senior Clerk Sibghat Ullah, he submitted his statement, but then didn't appear before the inquiry officer but only once. He was called through written parwana's to attend this office for personal hearing as well as cross-examination, but he deliberately avoiding his appearance.

**STATEMENT OF SENIOR CLERK SIBGHAT ULLAH:**

The Senior Clerk have submitted his written statement which reveals "On 22.06.2022, he appeared before the CCPO Peshawar in orderly room wherein he disclosed that Reader to SP Security was interfering in CC Branch CCP Peshawar. In this regard, the CCPO took notice of it and ordered to transfer all the staff of SP Security Peshawar. Consequent upon, Reader to SP Security Zahid tried to implicate him in fabricated allegation and told him to make Police Clearance Certificate for Afghan citizen, which was related to PAL Hayatabad Peshawar. In this connection, the CCPO Peshawar ordered to inquire into the matter wherein DSP Maroof Khan initiated inquiry, but as he was close to Reader Zahid and certainly would take a side of him. Therefore, he raised reservations upon the DSP Maroof Khan and appeared before the SSP Coordination wherein the inquiry was marked to DSP Headquarters, despite this DSP Maroof Khan kept conducting the inquiry.

**STATEMENT OF SI HAMAYUN I/C PAL HAYATABAD:**

He reiterated his previous statement submitted in preliminary inquiry which reveals that he came to know that bogus/forged Police Clearance Certificates were issued vide S No. 537 & 538. He further stated that Constable Intezar Shah provided these two numbers to SC Sibghat Ullah on Phone without bringing into his knowledge. Moreover, he also asked for the office copy of said Police Clearance Certificates wherein Intezar Shah disclosed that SC Sibghat Ullah used tactics and avoided handing over the office copy.

**CROSS-QUESTIONS:**

Q-1) **E.O:** Previously, did you have any contact/connection with SC Sibghat Ullah?

Ans) No, I saw him in PA to SSP Inv: Office for the first time during inquiry proceedings.

Q-2) **E.O:** How did you come to know that on 17.06.2022, Police Security Clearance has been issued without procedure?

Ans) After perusal of record and also through Computer Operator Farhan of PAL.

Q-3) **E.O:** When you came to know, what did you do?

Ans) I wrote report in Daily Diary Register and sent to high ups for information. Moreover, I sent FC Intezar Shah to obtain office copies from SC Sibghat Ullah while he used delaying tactics and did not hand over the office copies.

Q-4) **E.O:** Previously, did any one obtain dairy numbers without having the record?

Ans) The PAL office has been established for the General Public, while sometimes, the people are unaware of the procedure or paying visit to the high ups, so the SP Security office issues

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for the numbers then bring it into my notice or Moharrir, while FC Intezar Shah was on leave when I had issued instructions to my staff.

**STATEMENT OF SI ZAHID READER TO SP SECURITY PESHAWAR.**

He is posted as Reader to SP Security Peshawar and performing his duties with devotion and the high ups trust him. The allegation made by SC Sibghat Ullah regarding preparation of two Police Clearance Certificates for Afghan Citizens upon his direction is mere to damage his reputation and in this regard, Incharge PAL Hayatabad and FC Intezar Shah of PAL office may submit correct statements. He further added earlier SC Sibghat Ullah was also dismissed from the service due to his wrong doings. Moreover, SC Sibghat Ullah also changes his statements during inquires. Except this, SC Sibghat also made complaint via Citizen Portal against him and high ups for black mailing purpose.

**STATEMENT OF SAJJAD SIRAJ LINES OFFICER POLICE LINES PESHAWAR.**

On 22.06.2022, Incharge CC Branch SC Sibghat Ullah came to the office of Moharrir Police Lines and stated therein regarding writing of Daily Diary report in connection with the missing of Clearance Register, while he (Lines officer) was not present at Roznamcha. In this regard, Moharrir Police Line brought the matter into the notice of DSP Headquarter wherein the DSP concerned gave permission to Incharge CC to write his report in Daily Diary Register. Thereafter, SC Sibghat Ullah wrote his report vide DD No.49, dated 22.06.2022, Police Lines Peshawar.

**STATEMENT OF SYED EJAZ ALI SHAH OF PAL HAYATABAD:**

On 17.06.2022, he went to Mosque for Friday prayers and when he came to office, Constable Intezar Shah No.5281, told him that Incharge CC Branch had called on telephone and took two Diary numbers from him.

**CROSS-QUESTIONS:**

Q-1) **E.O:** Since how long have you been posted at PAL office?

Ans) I was posted at PAL office since its inauguration i.e. 23.06.2020.

Q-2) **E.O:** Previously, have you been asked for the provision of Diary Numbers for Police Clearance Certificates? If not, when FC Intezar Shah told you about the issuance of diary numbers; did you take any legal action?

Ans) No, I did not take any action.

Q-3) **E.O:** Wasn't it your responsibility? If yes, then why you did not take legal action?

Ans) No answer.

**STATEMENT OF JUNIOR CLERK UMAR SAEED THE THEN DISPATCH CLERK CC  
BRANCH CCP PESHAWAR.**

He was posted as Dispatch Clerk at CC Branch CCP Peshawar, and his duty time starts 05 PM to 10 PM on Friday and full day duty on Saturday & Sunday. He further stated that he was not aware of Clearance Certificates and his job was to issue Diary Dispatch numbers for Security programs on holidays. On 17.06.2022, at 06:00 PM, he reported to SRC Branch on his transfer while at that time I/C Sibghat Ullah and Muhammad Nawaz Computer Operator were

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present at CC Branch. He had performed his duties with devotion.

**CROSS-QUESTIONS:**

Q-1) **E.O:** Were you responsible for the Diary Dispatch of Security Programs only or anything else too?

Ans) Yes, because my duty starts from Friday evening till Monday morning wherein only the Security programs were scheduled not Clearances etc.

Q-2) **E.O:** Are separate Registers maintained for the Security Clearance and Security programs?

Ans) Yes.

**STATEMENT OF MUHAMMAD NAWAZ COMPUTER OPERATOR CC BRANCH PESHAWAR.**

He reiterated his previous statement submitted in preliminary inquiry which reveals that he was posted as Computer Operator at CC Branch CCP Peshawar and was preparing Security plans on daily basis and beside him other officials were also using the Computer wherein in his absence officials of CC Branch and Reader Branch used to operate his computer. On 17.06.2022, he was on duty while in his presence he did not notice any Security Clearance Certificate.

**CROSS-QUESTIONS:**

Q-1) **E.O:** When you type clearance certificate on computer, do you save it in any folder or not?

Ans) No, clearance certificates are just over written because less numbers of certificates are received for typing.

Q-2) **E.O:** Where the rest certificates are typed?

Ans) Rest of the certificates is typed at concerned PAL offices.

**STATEMENT OF CONSTABLE SYED INTEZAR SHAH NO. 5281, OF PAL HAYATABAD PESHAWAR.**

On Friday 17.06.2022, he was on duty at TIF Desk PAL and Computer Operator namely Fayyaz Khan was also present in the office, while the other staff members had gone for offering Friday prayer. He further stated that he received a phone call on office Number i.e. 091-5822834, wherein the In charge CC Branch namely Sibghat Ullah asked for the last two diary numbers of clearance register, upon that he replied that he is not aware about the clearance while Sibghat Ullah again asked the last diary number so he provided last number of clearance register, i.e. 536, thereafter, Sibghat Ullah took last two numbers i.e. 537 & 538 for Security Clearance certificates. He further added that Sibghat Ullah provided him data of the candidates, which were entered by him in the Security Clearance Register.

**CROSS-QUESTIONS:**

Q-1) **E.O:** Previously, did anybody asked you for providing blank diary numbers?

Ans) I was asked for the first time, while all the correspondence of PAL Hayatabad is dealt by CC Branch; therefore, he provided diary numbers data from him.

Q-2) **E.O:** On which desk are you performing your duty?

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Q-3) E.O: Moreover, what do you want to say in the matter?

Ans) On 17.06.2022, I gave two diary number i.e. 537 & 538, to I/C CC Branch, while on 18 & 19.06.2022, (Saturday & Sunday) were Holidays and on 20.06.2022, I made call to CC Branch, which was received by Shafat and told that Incharge CC Branch has not come to the office. On the same day at 11:00 AM, I again called the said branch and this time the call was received by SC Sibghat and he stated that he will hand over the office copies of the Police Clearance Certificate to DAK official, but did not do so, meanwhile I brought the matter into the notice of In charge PAL.

**STATEMENT OF CONSTABLE FARHAN ULLAH NO. 5097, OF PAL HAYATABAD PESHAWAR.**

He is posted as Computer Operator at Clearance Desk PAL Hayatabad and makes entries in Register. He went for offering Friday prayer when he came back, he came to know that entries were made in Register upon that he asked from Constable Intezar Shah, and in response he replied that I /C CC Branch SC Sibghat Ullah had called for diary numbers so he provided him the same and have also made entry in the Register. He further added that he reprimanded Intezar Shah as he (Farhanullah) was responsible for TIF desk. Thereafter, he brought the matter into the notice of Moharrar and In charge PAL wherein SI Hamayun Khan also wrote daily diary report against FC Intezar Shah.

**CROSS-QUESTIONS:**

Q-1) E.O: On which desk are you performing your duty?

Ans) I was posted at PAL office in the year 2020 and now posted for the second time for almost one year now.

Q-2) E.O: Previously, did anybody asked you for providing diary numbers?

Ans) No, I was never asked for the diary number, while if someone comes to collect the Police Clearance Certificate on behalf of the candidate, I facilitate him after making proper entry in the Register.

Q-3) E.O: When did you ask from the SC Sibghat Ullah regarding the numbers?

Ans) On Monday, I called his office for the provision of record, but the said Clerk was on leave while his staff disclosed that I/C CC had locked the record in his drawer. Thereafter, on Tuesday I again came for the collection of record, wherein the said clerk was not present and at last, he brought the matter into the notice of his In charge.

**STATEMENT OF CONSTABLE HAYAT IOBAL NO.275, OF CC BRANCH CCP PESHAWAR.**

He reiterated his previous statement submitted in preliminary inquiry which reveals that he was temporarily posted at CC Branch CCP Peshawar and performing his Night Shift duty, which starts from 05:00 PM Monday to Thursday, while on 17.06.2022, he was on leave. He further stated that his job is to make entries in Dispatch Register, distribute the security orders and also make entries of Police Clearance Certificates received from PAL office. On 21.06.2022, at 06:00 PM upon requisition he brought the register to the inquiry officer wherein the Serial Nos. 5796 & 5797 were not written by him and also unable to identify the

OFFICE OF  
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No. \_\_\_\_\_ / PA, Dated Peshawar the \_\_\_\_\_ / \_\_\_\_\_ / 2023.

**FINDINGS:-**

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1. Perusal of the requisite statements transpire that PAL office seldom provide the requisite numbers to CC Branch, while on the day of occurrence, FC Farhan had gone for offering Friday prayers and FC Intezar Shah was present in the office meanwhile I/C CC Sibghat Ullah telephonically called wherein FC Intezar Shah received the call, upon that SC Sibghat asked for the provision of two diary numbers of Clearance Certificate Register, while FC replied that he was unfamiliar with the Register, the I/C CC Sibghat again asked him to provide the last number of the register which he provided and after that serial No. 536, he reserved next two giving him the little detail such as Name etc on the promise to give full documents the next day.
2. Thereafter, I/C Sibghat was asked/contacted time & again for the provision of office copies of the Clearance Certificate (*issued to Afghan citizens*) while he was using delaying tactics and did not hand over the said office copies to PAL office. The matter was brought into the notice of I/C PAL SI Hamayun Khan. In response, he wrote a report in DD register and the DD report was sent to the high ups.
3. The DSP Security Muhammad Maroof Khan conducted facts finding inquiry in the matter on the direction of the high-Ups to dig out the real facts. During the course of inquiry, the alleged Senior Clerk Sibghat Ullah I/C CC Branch was found held responsible for making of forged Police Clearance Certificate to Afghan Nationals namely (Ilham Darmal and Zarmeena) issued vide Diary No. 5796 & 5797, dated 17.06.2022.
4. It came to the light that the delinquent official was also dismissed from service in past, due to his irresponsible attitude and involvement in such like practices vide SSP Coordination Peshawar office order No.17588-94/PA/SSP Coord, dated 24.09.2021. Furthermore, in the instant inquiry he submitted his statement stating therein that facts finding inquiry into the matter is under process with DSP Security, in this regard, he preferred application to SSP Coordination with request to change the inquiry officer as the said E.O is closed to SI Zahid (Reader to SP Security). Consequent upon, his application was marked to DSP Headquarters for inquiry and report. The DSP HQrs: Peshawar only enquired about the report regarding missing register incorporated vide DD No. 49 dated 22.03.2022 by the said Senior Clerk, wherein it was found that the register is with DSP Security Mr. Muhammad Maroof Khan in connection with facts finding enquiry of issuance of fake Clearance Certificates by Senior Clerk Sibghat Ullah.
5. Lastly, the delinquent official was called to this office time and again followed by written parwana's for cross questioning and further proceedings, but the same was avoided by him and preferred another application to the high ups wherein he himself admitted that he was called to attend the office of the undersigned in connection to the inquiry.



OFFICE OF THE  
SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.

Office Ph:No. 091-9210642

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**CONCLUSION:-**

Keeping in view the above circumstances and available evidence, Prima facie it seems that Senior Clerk Sibghat Ullah has exceeded his limits and illegally issued Clearance Certificates to two Afghan citizens with forged signature of SP Security CCP Peshawar, while during inquiries he repeatedly kept on changing his statements rather to face the enquiry and prove his innocence. In connection to the instance departmental inquiry after his irrelevant Chief, he was issued final Parwana vide No:2653/PA, dated 01.08.2022, to attend the office of the undersigned on 02.08.2022, for cross-questioning the witnesses. In compliance, the defaulter official wrote another extraneous reply on the same Parwana, which is quoted as under and enclosed: -

"معروض خدمت ہو کہ بچوں قسم کی انکوائری جناب DSP/HQrs صاحب پولیس لائن پشاور کے پاس زیر تعمیل تھی جو بموجب حکم افسران بالا انکوائری جناب DSP/HQrs پولیس لائن پشاور کے انکوائری میں DSP سیکورٹی معروف خان، SI زاہد اللہ ریڈر SP سیکورٹی کو ذمہ داران قرار دے کر انکوائری میں فائل رپورٹ، انکوائری آفیسر صاحب نے افسران بالا کو بھجوائی ہے جسکی جوابی کاپی لیٹر جناب SSP/INV صاحب پشاور کو برائے اطلاعیابی بھی بھجوائی گئی ہے۔ مزید ایک ہی قسم کی اسی انکوائری پر مزید کارروائی خلاف رولز ہے۔ نیز بحوالہ لیٹر نمبر 4740-4850/EV مورخہ 29.08.2017، جاریہ CPO پشاور (کاپی لف ہے) جناب SSP عہدہ کے آفیسر سینئر گریڈ کلرک کے خلاف انکوائری کرنے کا مجاز بھی نہیں۔ جناب DSP/HQrs صاحب پولیس لائن افسران بالا کے صدور حکم پر یہ زیر تعمیل انکوائری کا مسئلہ داخل دفتر کیا ہے۔ آپ صاحبان سے التماس ہے کہ بموجب فائل انکوائری رپورٹ DSP/HQrs صاحب داخل دفتر کرنے کی روشنی میں بلا کسی مزید کارروائی کے حتمی رپورٹ پر داخل دفتر فرمائیں۔ عدم انصاف کی فراہمی پر قانونی تحفظ محفوظ رکھ کر چارہ جوئی کیلئے عدالت رجوع کرونگا جسکے جواب کا انتظار ہے۔"

Going through his reply wherein the defaulter official cited the letter vides No.4740-4850/E-V, dated 29.08.2017, that the rank of SSP is not authorized to conduct inquiry against the Senior Clerk. In this regard, the same letter is quoted as under: -

"E-V, DISCIPLINARY ACTION, Powers of disciplinary action against Ministerial Staff were delegated to RPOs / DPOs within the meaning of Article 31 of Police 2002 (Now incorporated in Section 44(4) of Khyber Pakhtunkhwa Police Act, 2017) vide office Notification No. 8511/E-V, dated 28-12-2015. Police Policy Board approved action of the powers of disciplinary action against the Ministerial Staff to Addl: IGSP/DISG, head of unit of Police and SSsP / Dy: Commandants of the unit of Police in line with the notification ibid. Therefore, an addendum is issued in continuation of notification ibid and powers of disciplinary actions against the Ministerial Staff are also delegated to the authorities of units of Police as per detailed below.

Designation	Action is to be taken against the Ministerial Staff
Addl: IGSP/DISG, head of unit of Police	Office Supdt: (BPS-17), Stenographers (BPS-16) Assistant Grade Clerks (BPS-16), Steno typist (BPS-14) and Senior Clerk (BPS-14)

**OFFICE OF THE  
SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.**

Office Ph: No. 091-9210642

No. \_\_\_\_\_ /PA, Dated Peshawar the \_\_\_\_\_ /2023.

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SSsP/Dy: Commandants

Junior Clerks (BPS-11) and Naib Qasid/Class-IV  
(BPS-1 to 4)

It has been clearly mentioned in the above-mentioned letter that DIG/Head of Unit is authorized to initiate Departmental proceedings against Senior Clerk (BPS-14) and the same has been initiated by the CCPO, Peshawar under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, and the undersigned (Head of the Unit) has been nominated as Enquiry Officer.

Similarly, DSP Headquarters CCP Peshawar report in connection with missing of register reference naqalmaid No. 49 dated 22.03.2022 (Incorporated by the Senior Clerk Sibghat Ullah) which reveals that the Security Clearance Register was summoned by DSP Security in connection to the preliminary inquiry regarding issuance of fake clearance certificates, not a departmental enquiry which also opposed the allegations of the defaulter against the officials to save his skin. The delinquent official also used delaying tactics to hamper departmental proceedings initiated against him and repeatedly preferred applications with observations that he has no trust upon the Enquiry officers. Moreover, the said official neither produced any solid evidence in his favor nor did he bother to appear before the undersigned to record his statement regarding the allegations as per Charge Sheet and for cross-questioning the witnesses which clearly shows that he has no plausible reason/evidence to prove his stance/innocence.

Furthermore, Senior Clerk Sibghat Ullah also preferred complaints against SI Zahid Ullah to Worthy Inspector General of Police vide Dy No. 508/IAB dated 02.08.2022 and Dy No. 513/IAB dated 04.08.2022. Subsequently the same was marked to Worthy Capital City Police Officer, Peshawar for taking necessary action and report. In this regard enquiry was conducted against SI Zahid Ullah Reader to SP Security Peshawar by SSP Coordination, who concluded that the SP Security (Supervisory officer) of the applicant Senior Clerk Sibghat Ullah while posted as I/C CC Branch, received several verbal/written complaints against him regarding his involvement in mal-practices and in this connection report was entered by SI Hamayun Khan I/C PAL Hayatabad, Peshawar vide DD No. 11 dated 21.06.2022 regarding the issuance of 02 fake Police Clearance Certificates to Afghan Nationals from CC Branch. After conducting preliminary enquiry on the issuance of fake Police Clearance Certificate the said Clerk was found guilty and departmental enquiry was ordered which is under process. More so, in order to save his skin from punishment he submitted complaints to various forums against various person to conceal the real facts and divert the attention of high-Ups from the proceedings. The above-mentioned Clerk was directed time and again by his supervisory officer to mend his ways and refrain from such activities but all in vain, hence the said Clerk is a corrupt and notorious official, who has been dismissed earlier as well. He also known as an expert blackmailer, who used his office position for money mints. Thus, he is required to be

**OFFICE OF THE  
SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR**

Office Ph: No. 091-9210642

/PA, Dated Peshawar the 06 / 04 / 2023.


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

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**RECOMMENDATION:**

Keeping in view the above circumstances and material present on record and his constant evasion to face the enquiry proceedings properly; proves Senior Clerk Sibghat Ullah responsible for exceeding his limits and illegally issuing the above-mentioned Clearance Certificates to Afghan Nationals with fake signatures of SP Security CCP Peshawar. Hence, he is hereby recommended for an appropriate punishment.

Submitted, please.

  
Senior Superintendent of Police,  
Investigation, CCP, Peshawar



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

Phone No. 091-9210989 Fax: No. 091-9212597

ORDER

This order will dispose of the departmental inquiry of Senior Clerk Sibghat Ullah, initiated against him on the recommendations of SP/Security CCP, Peshawar to the effect that he while posted as I/C CC Branch CCP, Peshawar, involved himself in malpractices by doing fake signatures of the competent authority upon police clearance certificates of Two Afghan Nationals in order to receive illegal gratification. The SP/Security while giving written statement that the police clearance in r/o of Two Afghan Nationals have been issued through bogus signatures in lieu of Rs. 15000/- to 20000/- as bribe per certificate.

2. The record of the delinquent official also shows that he was also dismissed earlier from service on the allegations that he interferes in the affairs of others and filed anonymous complaints on Pakistan Citizen Portal and other forums against his fellow staff for ulterior motives.

3. In light of the inquiry report of SP/Security Peshawar based on the above allegations, the accused official was issued proper Charge Sheet and Summary of Allegations. SSP/Investigation Peshawar was appointed as inquiry officer to scrutinize the conduct of the accused official. The inquiry officer while going through the report of SP/Security recorded the statements of all P.Ws. which were cross questioned also. The inquiry officer after conducting thorough inquiry submitted his findings that keeping in view the above circumstances, material available on record and his constant evasion to face the inquiry proceedings properly proves that the accused official is responsible for exceeding his limits and illegally issuing the police clearance certificates to Afghan Nationals with fake signatures of SP/Security CCP, Peshawar.

4. After perusal of the findings of the inquiry officer and other documentary proof, directions were issued to register a criminal case under the relevant sections of law, in addition to the issuance of Show Cause Notice to the accused official. Subsequently a criminal case vide FIR No. 194/2023 u/s 420/468/471/118 Police Act PS East Cantt. was registered against him. Show Cause Notice was also issued to him through E-V Branch CPO.

(26)

He received the same and submitted his reply accordingly, which were put up and perused. He was called to appear in Orderly Room.

5. He was heard in person in Orderly Room and the relevant documents alongwith his reply to the Show Cause Notice perused. During personal hearing he categorically denied the allegations but failed to submit any plausible justification in his defense. Moreover, his previous record shows that he had earlier been dismissed from service for his misconduct, but had been reinstated by the then CCPO, on his appeal. He has failed to mend his ways.

6. Therefore, keeping in view the aforementioned facts and circumstances, Senior Clerk Sibghat Ullah, who is infamous for his malpractices and dereliction in his official duties and has been found guilty of gross misconduct. He had earlier been given a chance by reinstating him, but has been found incorrigible, and has gone to the extent of forging fake signatures of senior officers on extremely sensitive documents in order to receive illegal gratification from the innocent public from various elements. Therefore, in light of the findings of the inquiry officer, and his previous history and stinking reputation, his further retention in force is likely to cause serious security hazards besides bringing a bad name to police department. Hence, he is awarded the major punishment of "dismissal from service" under Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) rules 2011.

(MUHAMMAD IJAZ KHAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 1879-22 /PA dated Peshawar the

02/ 05/2023

Copies for information and necessary action to the :-

- 1. DIG of Police Internal Accountability Branch Khyber Pakhtunkhwa.
- 2. AIG/Establishment Khyber Pakhtunkhwa
- 3. SSSP/Operations, Coordination & Investigation Peshawar
- 4. AD/IT CCP Peshawar.
- 5. OS, AS, BC-II, & PO.

(میں نے اس کی کاپیوں کو 1355 پی ایم اے میں بھیج دیا ہے)

Encl- Encl

(13)

7469/67  
15/5/2023

(27)

جناب عزت ماب جناب انسپکٹر جنرل آف پولیس صوبہ خیبر پختونخواہ پشاور

(F)

اپیل بمراد کالعدمی مجاریہ صدر حکم لیٹر PA/44-38 مورخہ 02.05.23 وقرامی عنوان :-

انصاف بسلسلہ مقدمہ 194/23 بجرم 420/468/471/PPC/118 Police Act 2017

جناب عالی!

گزارش بحضور انور ہے کہ سائل بطور سینئر کلرک CPO پشاور میں تعینات ہے۔ حال ہی میں کہ میرے خلاف مقدمہ 194/23 مورخہ 17.04.2023 بجرم 420/468/471/PPC118 Police Act 2017 تھانہ شرقی درج کیا گیا ہے جو کہ جھوٹ کا پلندہ من گھڑت غلط بے بنیاد الزامات لگا کر قائم کیا گیا۔ اندریں بارہ اللہ تعالیٰ کو حاضر جان کر قرآن پاک کا حلف اٹھا کر اصل حقائق پر مبنی اپیل ہذا برائے کالعدمی مجاریہ حکم بالا و مقدمہ عنوان بالا میں بے قصور بے گناہ طلوت ہونے سے بری الزمہ کرا کر رہائی زید دفعہ 169 ض ف عطا فرمادیں۔

اصل حقائق حلقا بشر فرنگہ کرتا ہوں۔ CC برانچ دفتر CCPO پشاور کے جملہ امور بالا اختیارات 20/25 سال سے سب انسپکٹر ریڈرز زاہد اللہ SP سیکورٹی پشاور خود سنبھال چکے ہیں۔ کسی کا کیا مجال کہ اُنکے امور میں مداخلت کران اپنی ذمہ داری کے غلط استعمال مداخلت کرنے سے الزام دوسروں کے کندھوں پر ڈال دیتے ہیں

(۱) مذکورہ کی ایماں SI ہایون خان PAL انچارج حیات آباد میرے خلاف غلط من گھڑت رپورٹ روز نامہ میں میرے خلاف بے جا طور انکوآری کا آغاز کیا الزام یہ تھا کہ دو افغان نیشنل کو پولیس کلیرنس جعلی نماد دستخط سے جاری کیے گئے ہیں اندریں بارہ یہ انکوآری سابقہ DSP معروف خان سیکورٹی نے ذاتی دلچسپی ریڈرز SI زاہد اللہ (SP Security) کی ایماں پر میرے خلاف شروع کی۔

(۲) سابقہ DSP سیکورٹی معروف خان پر میں بے اعتمادی کیلئے تحریری درخواست دے جناب SSP/Coord صاحب کو دے کران کو انکوآری کرنے سے منع کیا لیکن باوجود منع کرنے کے میرے خلاف یکطرفہ کارروائی لا کر انکوآری کی تکمیل کی۔ انکوآری میں ذیل نکات زیر اعتراض ہیں۔

۱۔ بحوالہ لیٹر نمبر 4740-4650/E-V مورخہ 29.08.2017 مجاریہ Add:and DIG رینک کا آفیسر سینئر کلرک کے خلاف محکمانہ کارروائی کر سکتا ہے۔

۲۔ مجھے کسی قسم کا شوکا ز نوٹس یا سٹینٹ آف الیکیشن نہیں دیا گیا۔

۳۔ انکوآری آفیسر نے مجھے کوئی صفائی کا موقع فراہم نہیں کیا تا کہ میں اپنی بے گناہی ثابت کرنے کی وضاحت کرتا۔

۴۔ سنی سنائی غلط من گھڑت بے بنیاد پر الزامات کے تحت مجھے بغیر کسی اثباتی شہادت ثبوت کے مجھے مورد الزام ٹھہرایا۔

۵۔ جناب SSP/Inv صاحب انکوآری کی تکمیل میں بھی یہی امور وصول بالا کی خلاف ورزی کر کے کر کے مجھے انکوآری رپورٹ میں محکمانہ مزادینے کی سفارش کی ہے۔

۶۔ افغان نیشنل جن کے نام پولیس کلیرنس جاری کیے گئے ہیں ان کے ریکارڈ شدہ بیانات کے مطابق جعلی نماد دستخط سے جاری شدہ زرگے نامی شخص کلیرنس بنانے کی رپورٹ دی ہے، کوئی رشوت یا عوضانہ کی وضاحت نہیں ہے۔

۷۔ پولیس کلیرنس PAL حیات آباد سے جاری ہوتے ہیں نہ کہ CC برانچ پشاور کے دفتر سے۔ کیونکہ ایٹور جسٹر PAL میں یہ سرٹیفکیٹس سے مل  
نمبر 537/538 درج ذیل دستخطی جاری کیے گئے ہیں۔

۸۔ CC برانچ پشاور سے پولیس کلیرنس رجسٹر DSP معروف خان نے ریڈر سب انسپکٹر زاہد اللہ SP سیکورٹی کی ایما پر دفتر سے چوری  
کر کے اکیس ذاتی عناد سے از خود افغان نیشنل ناموں کا اندراج کیا ہے جس سے میرا کوئی تعلق نہیں۔ ایٹور جسٹر میں اندراجات مسمی FC کیسپوٹر  
شفاعت CC برانچ کرتے ہیں وہ بھی اس اندراج کی تحریر سے انکاری ہے۔ کہ یہ میرے ہاتھ کی تحریر نہیں کہ ریڈر SP سیکورٹی کی ہے۔

۹۔ انکوائری رپورٹ میرے خلاف سوچے سمجھے منصوبہ بندی کے تحت دھندہ کرنے والے اہلکاران نے سرغنہ PA/CCPO نیاز علی نے  
محکمہ کاروائی کو فوجداری مقدمہ کا رنگ دے کر میرے خلاف مندرجہ عنوان بالا مقدمہ درج کیا۔ جو کہ سراسر ذاتی عناد پر مبنی ہے۔  
نیز میں نے اندریں بارہ جناب CCPO صاحب پشاور کو انصاف کیلئے درخواست پیش کی جس پر انہوں نے اپنے روبرو پیشی کے لیے  
طلب کیا پیشی کے دوران اپنے معروضات زبانی پیش بحضور انور کر کے جناب CCPO صاحب نے غلط بے بنیاد ثبوت کیلئے مجھے حلفاً  
قرآن پاک و، طلاق کے عمل سے تسلی کرنے کا کہا میں نے قرآن پاک اور طلاق PA نیاز علی کے روبرو تسلی کرائی۔  
عالیجاہ! باوجود دوران پیشی جناب CCPO صاحب پشاور کو اُنکے PA نیاز علی کے روبرو قرآن پاک پر قسم اٹھا کر اور باقاعدہ طلاق کا کہہ کر  
اُنکی تسلی کرائی، کہ عائد الزامات کے تحت اندراج مقدمہ عنوان بالا غلط، دورغ گوئی، من گھڑت ہے اور حقیقت پر مبنی نہیں ہے۔ بحیثیت  
مسلمان و امتی محمدی ہونے کے ناطے ہر قسم کی تسلی کرائی لیکن بے سود؟۔

اسکے باوجود بھی خلاف شرع و قانون خداوندی کے جناب CCPO صاحب پشاور نے خلاف ورزی کر کے بحوالہ لیٹر نمبر 38-44/PA  
مورخہ 02.05.2023 کو نوکری سے برخاست کرینا حکم جاری کیا۔

اللہ تعالیٰ کے انصاف بسلسلہ وسیلہ انجناب کا محتاج ہے۔ اسلیے چونکہ سائل آپ صاحبان کے زیر نگرانی CPO پشاور میں تعینات ہے جناب  
CCPO صاحب پشاور کو میرے خلاف انکوائری کرنے اور صدور حکم برخاستگی کا کوئی اختیار نہیں۔ ایسے امر کی تکمیل میں میرے خلاف  
افسران بالا کو تحریری لیٹر بھجوانے کا مجاز ہے۔

۱۰۔ کیونکہ من سائیل کو جناب IG صاحب خیبر پختونخوا پشاور نے مجھے بھرتی کیا ہے اور وہی انکوائری آفیسری کی سفارش سے سزا اور جزا  
دے سکتا ہے۔ جناب CCPO صاحب پشاور نے خلاف اصول شرعی قرآن و سنت اور مروجہ قواعد کی دھچکیاں اُڑا کر اختیارات سے تجاوز  
کیا ہے اور مجھے انصاف کے فراہمی میں ظلم کا نشانہ بنایا۔ قانون خداوندی کا یہی انصاف؟ اپنا مسئلہ عدالت عظمیٰ خداوندی کے سپرد کرتا ہوں  
اور فراہمی انصاف کے لیے مندرجہ بالا اصل حقائق معروضات اور بحیثیت مسلمان قانون خداوندی کے بالادستی حقیقی انصاف کی فراہمی میں  
مجاز یہ حکم کا عدم قرار دیکر مشکور فرمادیں۔ اور مجھے ان ظالموں کے بچوں سے مزید نقصان سے بچنے کیلئے تحفظ عطا فرمادیں۔ اور اپنی ملازمت  
پر بحال رکھا جائے۔۔

المرقوم 08.05.2023

مندرجہ بالا معروضات کی روشنی مجھے اپنے نوکری پر بحالی کا حکم صادر فرمائیں۔

تازیت دعا گور ہوگا۔

العارض  
صاحب اللہ سینئر کلرک CPO پشاور

موبائیل نمبر 0333-9270822



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

29

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 17 of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 submitted by Senior Clerk Sibghat Ullah.

The CCPO, Peshawar Charge Sheeted the then Senior Clerk Sibghat Ullah under E&D Rules, 2011 on the following charges;

1. He while posted as I/C CC Branch CCP Peshawar allegedly involved himself in malpractices by doing fake signatures of the Competent Authority on the Police Clearance Certificate in order to receive illegal gratification from innocent people.
2. As per written statement of SP/Security, that Police Clearance Certificate in r/o two Afghan Nationals were issued through bogus signatures vide DD No. 5796 and 5797, dated 17.06.2022. It has also been learnt that for such certificates he received Rs. 15,000/- to 20,000/- as bribe per certificate.
3. In the recent past he was dismissed from service on similar allegations that he interferes in the affairs of others and filed anonymous complaints against his fellow staff for his choice posting.
4. He is a disreputable, villainous, notorious & infamous for using various complaints in Pakistan Citizen Portal for blackmailing staff members.

Meeting of the Appellate Board was held on 14.09.2023, wherein the petitioner was present and heard in detail. The petitioner denied the allegations.

Perusal of the record revealed that he was dismissed previously as well and this time dismissal is on very serious issues of corruption. Also, perusal of enquiry papers revealed that the allegations levelled against the petitioner have been proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that his petition is hereby Rejected.

Sd/-  
(AWAL KHAN) PSP  
Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. 3043-50 /23, dated Peshawar, the 30 /10 /2023.

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar.
2. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
3. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
4. Office Supdt: E-V, CPO Peshawar.
5. Official concerned.

(DR. ZAHID ULLAH) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.



**BEFORE THE COURT OF LEARNED JUDICIAL MAGISTRAT, PESHAWAR**

STATE.....VS.....SIBGHAT ULLAH

Subject

**APPLICATION FOR DISCHARGE/WITHDRAWAL 484/249A CR.PC,  
R/W 4C(III)/5B PROSECUTION ACT FOR WITHDRAWAL OF ABOVE  
RESPONDENT CASE IN CASE FIR NO. 194 DATED: 17.04.2023 U/S  
471/420/468/118(C)(D) POLICE ACT,**

H  
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Respected / Sir

That the case was submitted by the SHO concerned which was scrutinized during scrutiny the case was found not fit for prosecution on the following grounds.

1. That no direct evidence or eye witnesses are available in support of prosecution case.
2. That no FSL report is available in respect of signatures in question of SP security.
3. That during investigation it has not been verified through authentic evidence as to whether the call was made by the accused for obtaining fake certificates.
4. That as per allegations the certificates were provided by one "zargi" however during whole investigation he has not been interrogated as to who had facilitated him in obtaining the certificates.
5. That the beneficiaries of certificates did not charge the accused, they admitted that the certificates were provided by zargi.
6. That on whole case file no link or relationship has been established between the accused and zargi, hence in such situation the case cannot be established against the accused.

It is therefore requested that on the acceptance of this petition, the accused may kindly be permitted to withdraw the case.

Deposited

Approved by

Dated: 28.07.2023

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Better Copy#

BEFORE THE COURT OF LEARNED JUDICIAL MAGISTRATE, PESHAWAR.

STATE.....VS.....SIBGHAT ULLAH

Subject: APPLICATION FOR DISCHARGE/WITHDRAWAL  
494/249A CR.PC. R/W 4C(II)5B PROSECUTION ACT  
FOR WITHDRAWAL OF ABOVE RESPONDENT CASE  
IN CASE FIR NO. 194 DATED 17.04.2023 U/S  
471/420/468/118 (C)(D) POLICE ACT.

Respected/Sir,

That the case was submitted by the SHO concerned which was scrutinized during scrutiny the case was found not fit for prosecution on the following grounds.

1. That no direct evidence or eye witnesses are available in support of prosecution case.
2. That no FSL report is available in respect of signature in question of SP Security.
3. That during investigation it has not been verified through authentic evidence as to whether the call was made by the accused for obtaining fake certificate.
4. That as per allegations the certificates were provided by one "Zargi" however during whole investigation he has not been interrogated as to who had facilitated him in obtaining the certificates.
5. That the beneficiaries certificates did not charge the accused, rather they admitted that the certificates were provided by zargi.
6. That on whole case file no link or relationship has been established between the accused and zargi, hence in such situation the cases cannot be established against the accused.

It is therefore requested that on the acceptance of this petition prosecutions may kindly be permitted to withdraw the case.

Deputy Public Prosecutor  
Peshawar.

Approved by

District Public Prosecutor  
Peshawar.

گزارشیں سلیم میں بطور مجموعہ آ رہی ہیں سی سی  
لہذا میں یقیناً ہوں۔ بعد ازاں سی سی

میں سلوڈی نہ ہوگا اسی لیے تیار رہتا ہوں

میرے علاوہ بھی بہت سے ایفکار بھی گئی ہوگی  
کیونکہ یہ انجام دیا ہے۔ جن دفتر سی سی نہ آج

اور دفتر دیگر نہ آجے ایفکار الہ اوقات میری  
غیر موجودگی میں اصولہ کو اور اس وقت کرتے ہیں

2022.6.17 ہ میری گئی تھی اور میری موجودگی

میں ایسی کو گئی بھی کلیدیں میں آجے

کیسولڈ محمد نواز سی سی نہ آجے

اور  
Handwritten signature and scribbles

23/6/2022  
Handwritten signature

سوال ۱ ایفکار خاندان میں  
جواب ایسی نکلے

سوال ۲ ہمیں کہ روز مورخہ  
جواب میں نے صبح ۷ بجے گئی تھی کلیدیں میں آجے

سوال ۳ آجے نے علوی ریلوے ایسی پورٹ نہ آجے  
جواب اس کے نام نہیں  
میری کلیدیں میں آجے اور جیت بھی اونہ میں آجے

(6)

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VAKALAT NAMA

NO. \_\_\_\_\_/2023

IN THE COURT OF 1st Service Tribunal Peshawar

Sibgatullah

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Depot 2 bp.

(Respondent)  
(Defendant)

I/We, Sibgatullah

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

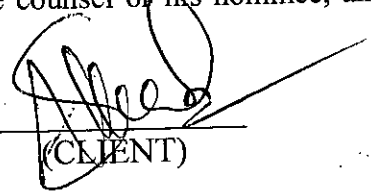
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding 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.

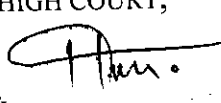
Dated \_\_\_\_\_/2023

  
(CLIENT)

ACCEPTED

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT,  
OF PAKISTAN.  
(BC No. 10-7327)

  
(S. NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

  
&  
HILAL ZUBAIR  
Advocate

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
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