


FORM OF ORDER SHEET

Court of _____

Appeal No. 213/2024

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29/01/2024	<p>The appeal of Mr. Mujeeb Ullah resubmitted today by Mr. Kabeer Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Mujeeb Ullah received today i.e on 22.01.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Copy of departmental appeal is not attached with the appeal. be placed on it.
- ② Revision petition is unsigned.
- ③ Page nos. 16, 17 & 18 of the appeal are illegible be replaced by legible/better one.

No. 160 /S.T.

Dt. 24/1 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kabir Ullah-Khattak Adv.
High Court at Peshawar.

Reason of objection
No 1 has properly
been mentioned
in para 6 of Facts
of appeal
while objection No 2
has been removed

Old
29/1/24

**BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR**

In Re S.A No. 213 /2024

Mujib Ullah Ex-Head Constable No.2429

VERSUS

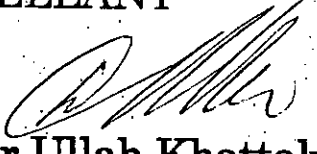
Inspector General of Police Khyber Pakhtukhwa
Peshawar & others

INDEX

S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-6
2.	Affidavit.		7
3.	Addresses of parties		8
4.	Condonation of delay		9-10
5.	copy of acquittal order	"A"	11
6.	copy of charge sheet & reply	"B & C"	12-14
7.	copy of show cause notice and reply	"D & E"	15-17
8.	Copy of impugned order	"F"	18
9.	Copy of the rejection	"G"	19-20
10.	Copy of revision petition and rejection order	"H & I"	21-24
11.	Wakalatnama		25


APPELLANT

Through


Kabir Ullah Khattak
Advocate, High Court
Peshawar.

Dated: 22/01/2024

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 213. /2024

Mujib Ullah Ex-Head Constable No.2429 posted PS
Choorā (Shikh Maltoon) District Mardan.

Appellant

VERSUS

1. Inspector General of Police Khyber Pakhtukhwa
Peshawar.
2. Reginald Police officer Mardna
3. District Police Officer Mardan.

Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE IMPUGNED ORDER
DATED 01/04/2022 PASSED BY THE
(RESPONDENT NO.3) WHEREBY THE
APPELLANT WAS IMPOSED TO MAJOR
PENALTY OF COMPULSORY RETIREMENT
FROM SERVICE AGAINST WHICH THE
APPELLANT FILED DEPARTMENTAL
APPEAL WITHIN ONE MONTH FROM THE
COMMUNICATION OF THE IMPUGNED
ORDER DATED 01.04.2022 WHICH WAS
REJECTED ON 03.10.2022 ON NO GOOD
GROUND.

Prayer:-

ON ACCEPTANCE OF THIS APPEAL THE
IMPUGNED ORDERS DATED 01/04/2022,
03/10/2022 & 22/12/2023 PASSED BY THE
RESPONDENTS MAY VERY GRACIOUSLY
BE SET ASIDE AND THE APPELLANT MAY
KINDLY BE REINSTATED IN SERVICE
WITH FULL BACK WAGES AND BENEFITS.
ANY OTHER RELIEF DEEMED
APPROPRIATE IN THE CIRCUMSTANCES
OF THE CASE NOT SPECIFICALLY ASKED
FOR, MAY ALSO BE GRANTED TO THE
APPELLANT.

Respectfully Sheweth,

1. That the Appellant joined his service in police department as constable at the year 2008 and after appointment he was performing his duty with great Zeal, Zest and devotion, but unfortunately he was falsely involved in a criminal case F.I.R No.492 dated 18.04.2019 U/S 3/4 -5 Ghag Act PS: Saddar Mardan.
2. That the appellant was acquitted from the said alleged criminal case by the court concerned on 03.03.2022 (copy of acquittal order is attached as annexure "A")

3. That a charge sheet and statement of allegation dated 29.04.2019 has been issued against the appellant which properly replied by the appellant whereby the appellant denied all the allegation leveled against him. (copy of charge sheet & reply are attached as annexure "B & C").
4. That the final show cause notice dated 25.02.2021 has been issued against the appellant which was properly replied by the appellant whereby the appellant denied all the allegation leveled against him (copy of show cause notice and reply are attached as annexure "D & E").
5. That the impugned order has been issued on 01.04.2022 against the appellant whereby the appellant has been imposed to major punishment compulsory retirement from service. (Copy of impugned order is attached as annexure "F").
6. That the appellant submitted a departmental appeal within one month from the communication of the impugned order dated 01.04.2022 which was rejected on 03.10.2022

(4)

but unlucky copy of department appeal was not kept by the appellant. (Copy of the rejection order is attached "G").

7. That after the appellate order the appellant filed revision petition against the appellate order which was rejected on 22.12.2023. (Copy of revision petition and rejection order are attached as annexure "H & I").
8. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That the impugned orders 01.04.2022 & 03.10.222 is come under the definition of void order because it has been passed without fulfilling the codal formalities.
- B. That no departmental and regular inquiry has been conducted by the Respondent department and no chance of personal hearing has been provided to the appellant in this respect the appellant relied upon the judgment dated 2008 SCMR Page:1369.

5

- C. It is a well settled maxim no one can be condemned unheard because it is against the natural justice of law in this respect the appellant relied upon a judgment reported on 2008 SCMR page:678.
- D. That no statement of witness has been recorded and no opportunity of cross examination has been provided to the appellant.
- E. That the appellant has already been acquitted from the criminal case by the court concerned.
- F. That the impugned order is also a void order because it has been passed after acquittal of the appellant.
- G. That any other ground not raised here may graciously be allowed to be raised at the time of arguments on the instant service appeal.


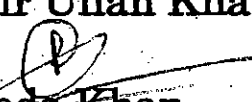
It is therefore, most humbly prayed that on acceptance of this appeal the impugned orders dated 01/04/2022, 03/10/2022 & 22.12.2023 passed by the respondents may very graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

(5)

Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.


APPELLANT

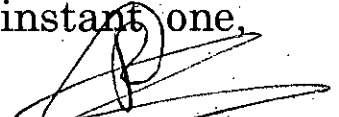
Through


Kabir Ullah Khattak
& 
Rozeeda Khan
Advocates, High Court
Peshawar.

Dated: 22/01/2024

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.


Advocate.

(7)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

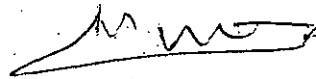
Mujib Ullah Ex-Head Constable No.2429

VERSUS

Inspector General of Police Khyber Pakhtukhwa
Peshawar & others


AFFIDAVIT

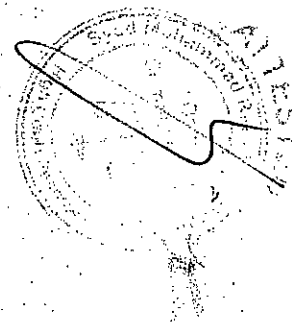
I, Mujib Ullah Ex-Head Constable No.2429 posted
PS Chooria (Shikh Maltoon) District Mardan, do
hereby solemnly affirm and declare that all the contents of
the instant appeal are true and correct to the best of my
knowledge and belief and nothing has been concealed or
withheld from this Hon'ble Court.



DEPONENT

Identified by:


Roeeda Khan
Advocate High Court
Peshawar.



Dated:22-01-2024

(8)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

Mujib Ullah Ex-Head Constable No.2429

VERSUS

Inspector General of Police Khyber Pakhtukhwa
Peshawar & others

ADDRESSES OF PARTIES

PETITIONER.


Mujib Ullah Ex-Head Constable No.2429 posted PS
Choorā (Shikh Maltoon) District Mardan..

ADDRESSES OF RESPONDENTS

1. Inspector General of Police Khyber Pakhtukhwa
Peshawar.
2. Reginald Police officer Mardna
3. District Police Officer Mardan.

Through


APPELLANT


Roeda Khan
Advocate, High Court
Peshawar.

Dated: 22/01/2024

(9)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

Mujib Ullah Ex-Head Constable No.2429

VERSUS

Inspector General of Police Khyber Pakhtukhwa Peshawar &
others

APPLICATION FOR CONDONATION OF DELAY (if any)

Respectfully Sheweth,

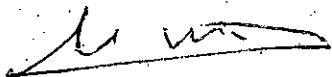
Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the appellant was acquitted from the said alleged criminal case by the court concerned on 03.03.2022.
3. That the appellant submitted a departmental appeal within one month form the communication of the impugned order dated 01.04.2022 which was rejected on 03.10.2022 but unlucky copy of department appeal was not kept by the appellant.

15

4. That the impugned orders 01.04.2022 & 03.10.222 is come under the definition of void order because it has been passed without fulfilling the codal formalities.
5. That the appellant has already been acquitted from the criminal case by the court concerned.
6. That the impugned order is also a void order because it has been passed after acquittal of the appellant.
7. That there are many judgment of the supreme court as well as specific provision of law that limitation has been counted from the date of communication.
8. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.


Appellant

Through

Date: 22.01.2024


Kabir Khan Khattak

& 
Roeda Khan

Advocates, High Court
Peshawar

معرفه قوالی (11) در صورتی که از مثل متعلقه التضا - لعم الله صون Mic



12

نمبر 2 - (3) - ضریب - 195/22 - 33/22 - 19/19 - 79/2
2036
نیز - نیا علی

Or-----26
Dt.3.03.2022

SPP for the State present.

Accused on bail present. Complainant early in the morning present but later on disappeared.

Through this order I intends to dispose of an application Under Section 249-A Cr.PC filed by the counsel for accused for their acquittal.

Arguments heard and record perused.

Allegation against the accused/petitioners are that Complainant namely Nisar Khan son of Dost Muhammad resident of Khazana Dheri Mardan has submitted an application against the accused Niaz Ali, Mujibullah, Zakir Ullah sons of Niaz Ali to the effect that Mst.Palwasha is his real daughter and she is a student of third year while the accused are his relative, came to his house, proposed his daughter but he refused and now the accused forcibly want the hands of his daughter and threatened them for dire consequences and threatened for abduction of her which badly affect the education of his daughter. He made report to the local police, resultantly instant FIR.

[Handwritten signature]

Perusal of record would shows that though the accused facing trial have directly been charged and nominated by the complainant in the FIR but no such evidence has been produced on record that accused facing trial forcibly demanded and proposed the hands of Mst.Palwasha or restrained anyone from ^{getting} ~~be~~ engaged ^{to her}

Further during investigation of the case complainant had admitted himself that one Mujib Ullah ask for the hands of Mst.Palwasha and he was agreed but now ^{is} not interested for the marriage. Further the alleged occurrence has taken place in different time in the year 2019 and instant FIR has been lodged on 18.04.2019

Certified To Be True Copy

11 AUG 2023

Examiner Copying Branch
Session Court Mardan

Contd: Order:
3.03.2022


Case against the accused facing trial ^{was} put in court on 19.11.2019. Accused were summoned who appeared and after compliance of other legal formalities charge against the accused framed on 22.01.2020, thereafter prosecution was directed to produce its evidence, however since then till today prosecution produced only one PWs even the complainant is not interested to produce his private witnesses despite repeated directions.

In such circumstances, there seems no likelihood of conviction of the accused facing trial in the present case. Resultantly, the application is accepted and accused facing trial are acquitted Under Section 249-A Cr.PC. They are on bail, bail bonds furnished by them are cancelled and sureties there under are absolved from the liabilities towards the bail bonds.

Case property be disposed off according to law after laps of limitation period provided for an appeal/revision.

File be consigned to record room after necessary completion and compilation.

ANNOUNCED:
Dt.3.03.2022


(Nacem Ullah Jadoon)
Judicial Magistrate, Mardan

Name of Application: Ullah Nacem
No. of Application: 12308
Date of presentation of application: 25-7-23
Date of preparation of copies: 11-8-23
Number of Pages: 35-8-
Court Fees: 0
Urgent Fees: 0
Signed of copyist/Examiner: [Signature]
Date of Delivery: 11/8/23

Verified To Be True Copy

11 AUG 2023

Examiner Copying Branch
Session Court Mardan



**OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpo_mardan@yahoo.com

2019

CHARGE SHEET


I, **SAJJAD KHAN (PSP)**, District Police Officer Mardan, as competent authority, hereby charge **LHC Najeeb Ullah No.2429**, while posted at Police Station Choorra (now under suspension Police Lines), as per attached Statement of Allegations:

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

2. You are, therefore, required to submit your written defense within **07 days** of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.

3. Your written defense, if any, should reach the Enquiry Officers within the specified period, failing which, it shall be presumed that you have no defense to put-in and in that case, ex-parte action shall follow against you.

4. Intimate whether you desired to be heard in person


(SAJJAD KHAN) PSP
District Police Officer,
Mardan.



(13)

**OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpo_mardan@yahoo.com

2019

No. 166 /PA

Dated 29/12/2019

DISCIPLINARY ACTION

I, SAJJAD KHAN (PSP), District Police Officer Mardan, as competent authority am of the opinion that LHC Najeeb Ullah No.2429, himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Police Rule, 1975.


STATEMENT OF ALLEGATIONS

Whereas, LHC Najeeb Ullah No.2429, who is posted at Police Station Choora (now under suspension Police Lines), has been charged in a case vide FIR No.492 dated 18-04-2019 U/S 5 Ghag Act Police Station Saddar.

For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, ASP Ziaullah SDPO/TBI is nominated as Enquiry Officer.

The Enquiry Officer shall, in accordance with the provision of Police Rules 1975, provides reasonable opportunity of hearing to the accused Police Officer, record/submit his findings and make within (30) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused Official.

LHC Najeeb Ullah is directed to appear before the Enquiry Officer on the date and time and place fixed by the Enquiry Officer.


(SAJJAD KHAN) PSP
District Police Officer,
Mardan.

جواب عالی

حوالہ چارج ٹیفٹ مشورہ معروضی خدمت ہوں کہ سائل

کے خلاف کوالر مقدمہ عدالت 492 مہم 19/19 ص 3.4.5 منکر نسبت قیام

یہاں درج رہے ہیں من سائل قلمد پولیس میں سال 1952 میں کفر حق

باز نہ ہوں اور قلمد جگہوں پر ڈپوٹیشن مابیت اہل ذمہاری سے سہرا ہم درے

ملی دیکھی ہے اور اب مقدمہ درج میں سائل کو قلمد پولیس کے طرف کو حق سزا

میں سائل کا بیٹا والدین کے معہرے ماموں کے محاسبی سے محاسبی اور

کھانڈوں کے تقریباً 2000 روپوں کے منگنی محاسبی میں منگنی محاسبی اور

اب شہزاد والدین کے شادی کے محاسبی ماموں کے محاسبی اور شہزاد شادی

محاسبی ماموں کے محاسبی ماموں کے پان لکھ روپوں کے وقت ماموں کے

دشت بیٹا سے القادر لیا اور قلمد مہم در میں پولیس محاسبی ماموں کے سائل

میں سائل کے والد کے خلاف حرج مقدمہ درج بلڈر سٹریٹ ماموں کے سائل

پیر میں قلمد میں پولیس کو پیشدینہ ہو کر بعد قلمد میں جیل قلمد میں سائل

بوجہ معہرے موت عدالت قیام کے خلاف منظور کرنا سائل کو قلمد عدالت

میں سائل کے والد کے خلاف حرج مقدمہ درج بلڈر سٹریٹ ماموں کے سائل

پیر میں قلمد میں پولیس کو پیشدینہ ہو کر بعد قلمد میں جیل قلمد میں سائل

بوجہ معہرے موت عدالت قیام کے خلاف منظور کرنا سائل کو قلمد عدالت

میں سائل کے والد کے خلاف حرج مقدمہ درج بلڈر سٹریٹ ماموں کے سائل

پیر میں قلمد میں پولیس کو پیشدینہ ہو کر بعد قلمد میں جیل قلمد میں سائل

Attest

NON



OF THE
DISTRICT POLICE OFFICER,
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com

2021

No. 74 /PA

Dated 23/2/2021

FINAL SHOW CAUSE NOTICE

Constable Mujeeb-Ullah No. 2429, while posted at PS Choora, now Police Lines Mardan, has been charged in a case vide FIR No.492 date 1-18-04-2019 U/S 34-5 Ghag Act PS Saddar.

In this connection, during the course of De-novo Departmental Enquiry, conducted by Mr. Rahim Hussain, the then SP/Ops Mardan vide his office letter No.46/PA (Ops) dated 11-02-2021, in pursuance of this office Statement of Disciplinary Action/Charge Sheet No.166/PA dated 29-04-2019, holding responsible you of misconduct.

You were heard in OR on 24-02-2021, but you have failed to satisfy the undersigned, therefore, you are being issued this final show cause notice.

Therefore, it is proposed to impose Major/Minor penalty as envisaged under Rules 4 (b) of the Khyber Pakhtunkhwa Police Rules 1975.

Hence, I Dr. Zahid Ullah (PSP) District Police Officer Mardan, in exercise of the power vested in me under Rules 5 (3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975 call upon you to Show Cause Finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of receipt of this Notice, failing which, it will be presumed that you have no explanation to offer.

You are liberty to appear for personal hearing before the undersigned.

Received by [Signature]

Dated: 01/02/2021

[Signature]
(Dr. Zahid Ullah) PSP
District Police Officer
Mardan

Copy to R1 Police Lines Mardan (Attention Reader) to deliver this Notice upon the alleged official & the receipt thereof shall be returned to this office within (05) days positively for onward necessary action.

BEFORE THE DISTRICT POLICE OFFICER MARDAN
REPLY TO THE SHOW CAUSE NOTICE NO.44/PA
DATED: 25-02-2021

Respected Sir,

It is submitted that your honour had issued the subject show cause notice to the petitioner with the following allegations:

"That Constable Mujeeb-Ullah No.2429, while posted at PS Choorra now Police Lines Mardan has been charged in a case vide FIR No.492 dated 18-04-2019 U/S 3/4/6 Ghag Act, PS Saddar." (Copy of FIR is enclosed).

My detailed submissions in response to the above allegations are as under:-

1. That one Nisar Khan S/o Dost Muhammad r/o Khazana Dheri, Mardan has submitted an application against the (Petitioner) Mujeeb-Ullah and Zakirullah sons of Niaz Ali and Niaz Ali to the effect that the petitioner wants to marry forcibly his daughter Mst. Palwasha aged 18/19 years. Mast Palwasha has refused of her will to marry the one Mujeeb-Ullah After refusal of my daughter from marriage the Mujeebullah and his family members are regularly threatening us with his consequences. ON the basis of this report the above FIR No.492 dated 13-__-2019 U.S 3/4/5 Ghag Act as PS Saddar has been registered against the petitioner Mujeeb-Ullah Zakir-Ullah and his father Niaz Ali
2. That later on the petitioner and his brother and father sought post arrest Bail from the honourable Court of Faryal Zia Mufti ASJ-V Mardan on 02-05-2019. **(Copy of Bail order attached).**
3. That in this connection a De-Novo departmental inquiry was conducted by Mr. Rahim Hussain, SP/Ops Mardan vide his office letter No.46/PA (Ops) dated 11-2-2021, in pursuance of statement of Disciplinary Action/charge sheet No.166/PA dated 29-04-2019, holding the petitioner responsible for the alleged misconduct.
4. That onside DPO office no.44/PA dated 25-05-2021 a "Final Show Cause Notice" has been issued which is received to the petitioner on 01-03-20231.

GROUND OF DEFENCE

- a. That the petitioner alongwith his brother and father have been falsely implicated on the basis of concocted and fake story. The KPK Ghag Act 2013 donot envisage the actual essence of arranged proposal/engagement/marriages. In the petitioner case/here is no any citation relevant towards the involvement in the custom any rite of "Ghag."
- b. The SHO SI Ajab Khan Durrani has never confirmed the act opening of the alleged stage drama by the one Nisar Khan and his register. It is a sort of Matrimonial dispute and having no connection whatsoever with the Ghag Act. Any baseless allegation should not be diverted into the criminal prosecution of someone to run his life and area.
- c. That the time of occurrence and witnesses are fake and just to implicate the petitioner and his family one the basis of Ghag Act. Any family dispute should be labeled with Ghag Act so far in the context of the petitioner has happened now.

(E) (16)

1

~~BEFORE THE DISTRICT POLICE OFFICER, MARDAN~~

REPLY TO THE SHOW CAUSE NOTICE NO. 44/PA

DATED: 25-02-2021

Respected Sir,

It is submitted that your honour had issued the subject show cause notice to the petitioner, with the following allegations:

" That Constable Mujeeb-Ullah No:2429, while posted at PS Choorah now Police Lines Mardan, has been charged in a case v de FIR No.492 dated 18-04-2019 U/S 3/4/5 Ghag Act, PS. Saddar. " (Copy of FIR is enclosed)

My detailed submissions in response to the above allegations are as under:-

1. That one Nisar Khan s/o Dost Muhammad r/o Khazana Dhan, Mardan has submitted an application against the (Petitioner) Mujeeb-Ullah and Zakrullah sons of Niaz Ali and Niaz Ali to the effect that the petitioner wants to marry forcibly his daughter Mst Palwasha aged 18/19 years. Mst Palwasha has refused her own free will to marry the one Mujeeb-Ullah. After refusal of my daughter from marriage, the Mujeeb-Ullah and his family members are regularly threatening us with dire consequences. On the basis of this report the above FIR No.492 dated 18-04-2019 U/S 3/4/5 Ghag Act at PS Saddar has been registered against the petitioner Mujeeb-Ullah Zakir-Ullah and his father Niaz Ali.
2. That later on the petitioner and his brother and father sought post arrest Bail from the Honouable Court of Faryal Zia Mufti ASJ-V Mardan on 02-05-2019. (Copy of Bail Order is attached)
3. That in this connection a De-novo departmental Enquiry was conducted by Mr. Rahim Hussain, SP/Ops Mardan vide his office letter No.46/PA (Ops) dated 11-2-2021 in pursuance of statement of Disciplinary Action/charge sheet No.166/PA dated 29-04-2019, holding the petitioner responsible for the alleged misconduct.
4. That on vide DPO Office letter no. 44/PA dated 25-02-2021 a "Final Show Cause Notice" has been issued which is received to the petitioner on 01-03-2021.

GROUND OF DEFENCE:

a. That the petitioner alongwith his brother and father have been falsely implicated on the basis of concocted and fake story. The KPK Ghag Act-2013 donot envisage the actual essence of arranged proposal/ engagements/ marriages. In the petitioner case there is no any citation of relevancy towards the involvement in the customary rite of "Ghag". The SHO SI Ajab Khan Durrani has never confirmed the actual happening of the alleged staged drama by the one Nisar Khan and his daughter. It is a sort of Matrimonial dispute and having no connection whatsoever with the Ghag Act. Any baseless allegation should not be diverted into the criminal prosecution of someone to ruin his life and career.

b. That the time of occurrence and witnesses are fake and just to implicate the petitioner and his family on the basis of Ghag Act. Any family dispute should not be labelled with Ghag act so far in the context of the petitioner has happened now.

Better Copy-17

- d. The whole allegation of forcèful marriage is baseless and the arrangement ceremony of the petitioner had took place some two years in the presence of more than 250 people. Afterwards many matrimonial rites too place between the two families, Then how the petitioner has been blamed for the commission of alleged "Ghag Ordinance" which is totally an arranged "Rishta being denied onlfidity and conspiracy alone.
- e. The investigation of the case has since been completed. Complete challan has been submitted in the court which is pending The fate of the criminal case has yet to be decided by the competent court of law. The competent authority of police kept has been required to keep pending the departmental proceedings all the final judgment of the court but in the instant case such principles have been ignored which is against the norms of justice.
- f. The petitioner in view of the above facts and circumstances the "Final Show Cause Notice" issued by your Honour may kindly be filed, please.

Yours Obediently,

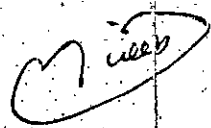
(CONSTABLE NAJEEB ULLAH)
NO.2429
COMMISSIONER OFFICE MARDAN

Dated: March 2021,

- d. The whole allegation of forceful marriage is baseless and the engagement ceremony of the petitioner had taken place some two years ago in the presence of more than 250 people. After wards many matrimonial rites took place between the two families. Therefore the petitioner has been blamed for the commission of alleged "Ghag" "Ghag" "Ghag" which is totally an arranged "Rishta" being entered on the basis of fidelity and conspiracy alone.
- e. The investigation of the case has since been completed. Complete challan has been submitted in the court which is pending. The fate of the criminal case has yet to be decided by the competent court of law. The competent authority of police deptt has been required to keep pending the departmental proceedings till the final judgment of the court but in the instant case such principles have been ignored which is against the norms of justice.
- f. The petitioner has not been dealt departmentally prior to this which is a precedent from the shining service record of the petitioner.

Keeping in view of the above facts and circumstances the "Final Show Cause Notice" issued by your Hon'ble may kindly be filed, please.

Yours Obediently,



(CONSTABLE NAJEEB-ULLAH)
NO.2429
COMMISSIONER OFFICE MARCAN.

Dated: March, 2021.

The officer was heard multiple times & he sought time to resolve the issue. The lady is his cousin & he is still persisting with his demand & not mind his ways. The officer is part of disturbed force & such demands high level of professional & personal conduct. The officer has served 24 bad entries in his service. The E.O & ...

Better Copy 18

MARDAN

Tell No. 0937-9230109 & Fax No.0937-9230111

Email: dpomdn@gmail.com

No.2921-23/PA

Dated 4/4/2022

ORDER ON ENQUIRY OF LHC MUJEEB ULLAH NO.2429

This order will dispose-off a Departmental Enquiry under Police Rules 1975 initiated against LHC Mujeeb Ullah No.2429, under the allegations that while posted at Police Station Choorā (now PS Sheikh Maltoon), was placed under suspension vide this office OB No.900 dated 23-04-2019, issued vide order/endorsement No.2765-69/OSI dated 25-04-2019, (Who was later-on re-intated in service provisionally vide this office OB No.1953 dated 18-09-2019, issued order/endorsement No.5768-71/OSI dated 19-09-2019) on account of charging in a case vide FIR No.492 dated 18.04.2019 U/S 3/4 -5 Ghag Act PS Saddar & to ascertain facts, he was proceeded against departmentally through ASP Zia Ullah, the then SDPO Takht-Bhai vide this office Statement of Disciplinary Action/Charge Sheet No.166/PA dated 29.04.2019 Who (E.C) after fulfillment necessary process, submitted his Finding Report to this office vide his office letter No.1 16/ST dated 28.05.2019, concluding that all the fault doesn't lie on LHC Mujeeb Ullah, as both parties are equally responsible for their due share, so recommended him for warning.

On perusal of above findings, Mr. Sajjad Khan, he then DPO Mardan didn't agree with Enquiry Officer (SDPO Takht-Bhia) and the issue was re-enquired de-novo) through Mr. Muhammad Ayaz, the then SP/Investigation Mardan, who (Sp/Inv: Mardan) vide his office letter No.1071/PA/Inv: dated 03-10-2019, reiterated the stance of SDPO Takht-Bhai by recommending warning for LHC Mujeeb Ullah. On perusal of finding of the then SP/Investigation Mardan, the enquiry papers were kept pending by Mr. Sajjad Khan, the then DPO Mardan on 08-11-2019 till courts decision.

On talking over charge as DPO Mardan by the undersigned the enquiry papers were re-enquired (de-novo) through Mr. Rahim Hussain, the then SP/Operation Mardan, who (SP/Ops) vide his office letter No.46/PA (Ops) dated 11-02-2021, holding responsible LRC Mujeeb Ullah of misconnect & and Nikah. His act is against the rules/regulations of the department which can lead to any odd situation in future.

Final Order

During hearing in OR on 24-02-2021, LRH Mujeeb Ullah Failed to presence any plausible reasons in his defence, therefore, he was served with a Final Show Cause Notice, issued vide this office No.44/PA dated 25.02.2021, to which, his reply was received and found unsatisfactory, therefore he was again heard in OR on 30.03.2022, during which, he could not satisfy the undersigned.

The above discussion revealed that the delinquent official was heard multiple times a& he south time to resolve the issue. The lady is his cousin and he is still persisting with his demand and not mends his ways, The official is part of disciplined force, which demands high level of professional and personal conduct. He has earned (24) bad entries in his service, therefore, keeping in view the findings of the Enquiry officer and material on record, LRHC Mujeeb Ullah is awarded major punishment of compulsory retirement form Mardan Police with immediately effect in exercise of the power vested in me under Police Rules-1975.

OB No:843

Dated 01/4/2022

(Dr. Zahid Ullah) PSP
District Police Officer
Mardan

Copy forwarded for information & n/action to:-

- 1) The DSs P/HQrs & Sheikh Maltoon in Mardan
- 2) The P.O & E.C (Police Officer) Mardan
- 3) The OSI (Police Officer) Mardan with sheets.

MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: doqmdn@gmail.com

F^v (18)

2881-23 PA

Dated 6/4/2022

ORDER ON ENQUIRY OF LHC MUJEEB ULLAH NO. 242

This order will dispose-off a Departmental Enquiry, under Police Rules 1975, initiated against LHC Mujeeb Ullah No.2429, under the allegations that while posted at Police Station Choora (now PS Sheikh Maltoon), was placed under suspension vide this office O3 No.500 dated 23-04-2019, issued vide order/endorsement No.2765-69/OSI dated 25-04-2019, (who was later on re-intated in service provisionally vide this office OB No.1957 dated 18-09-2019, issued order/endorsement No.5768-71/OSI dated 19-09-2019) on account of charging in a case vide F.R No.492 dated 18-04-2019 U/S 5-Ghag Act PS Saddar & to ascertain facts, he was proceeded against departmentally through ASP Zia Ullah, the then SDPO Takht-Bhai vide his office Statement of Disciplinary Action/Charge Sheet No.166/PA dated 29-04-2019, who (E.C) after fulfillment necessary process, submitted his Finding Report to this office vide his office letter No.116/ST dated 28-05-2019, concluding that all the fault doesn't lie on LHC Mujeeb Ullah, as both parties are equally responsible for their due share, so recommended him for warning.

On perusal of above findings, Mr. Sajjad Khan, the then DPO Mardan didn't agree with Enquiry Officer (SDPO Takht-Bhai) and the issue was re-enquired (de-novo) through Mr. Muhammad Ayaz, the then SP/Investigation Mardan, who (SP/Inv: Mardan) vide his office letter No.1071/PA/Inv: dated 03-10-2019, reiterated the stance of SDPO Takht-Bhai by recommending warning for LHC Mujeeb Ullah. On perusal of findings of the then SP/Investigation Mardan, the enquiry papers were kept pending by Mr. Sajjad Khan, the then DPO Mardan on 08-11-2019 till court's decision.

On taking over charge as DPO Mardan by the undersigned the enquiry papers were re-enquired (de-novo) through Mr. Rahim Hussain, the then SP/Operations Mardan, who (SP/Ops) vide his office letter No.46/PA (Ops) dated 11-02-2021, holding responsible LHC Mujeeb Ullah of misconduct by pressuring/compelling parents of Mst: Palwasha to conduct her marriage with him without her consent & any Nikah. His act is against the rules/regulation of the department, which can lead to any odd situation in future.

Final Order

During hearing in OR on 24-02-2021 LHC Mujeeb Ullah failed to present any plausible reasons in his defense, therefore, he was served with a Final Show Cause Notice, issued vide this office No.44/PA dated 25-02-2021, to which, his reply was received and found unsatisfactory, therefore, he was again heard in OR on 30-03-2022, during which, he could not satisfy the undersigned.

The above discussion revealed that the delinquent official was heard multiple times & he sought time to resolve the issue. The lady is his cousin and he is still persisting with his demand and not mends his ways. The official is part of disciplined force, which demands high level of professional and personal conduct. He has earned (24) bad entries in his service, therefore, keeping in view the findings of the Enquiry Officer and material on record, LHC Mujeeb Ullah is awarded major punishment of compulsory retirement from Mardan Police with immediate effect, in exercise of the power vested in me under Police Rules-1975.

OB No. 843

Dated 01/4/2022.

(Dr. Zahid Ullah) PSP
District Police Officer
Mardan

Copy forwarded for information & n/action to:-

- 1) The DSsP/HQrs & Sheikh Maltoon in Mardan.
- 2) The P.O & E.C (Police Office) Mardan.
- 3) The OSI (Police Office) Mardan with (S) Shee's.

G^u (19)

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-LHC Mujeeb Ullah No. 2429 of Mardan District against the order of District Police Officer, Mardan, whereby he was awarded major punishment of compulsory retirement from service vide OB: No. 843 dated 01.04.2022. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station Choorā was placed under suspension on account of involvement in a case vide FIR No. 492 dated 18.04.2019 u/s 3/4 - 5 Ghag Act Police Station Saddar, District Mardan.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and the then Sub Divisional Police Officer, (SDPO) Takht Bhai, Mardan was nominated as enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his report to District Police Officer, Mardan concluding that all the fault doesn't lie on the delinquent Officer, as both parties are equally responsible for their due share, so recommended him for warning.

On the perusal of findings, the then District Police Officer, Mardan didn't agree with the Enquiry Officer and the issue was re-enquired (de-novo) through the then Superintendent of Police, Investigation, Mardan. He reiterated the stance of the then Sub Divisional Police Officer, (SDPO) Takht Bhai, Mardan by recommending warning for the delinquent Officer. On perusal of findings of the then Superintendent of Police, Investigation, Mardan, the enquiry papers were kept pending by the then District Police Officer, Mardan on 08.11.2019 till court decision.

On taking over the Charge as District Police Officer, Mardan by Dr. Zahid Ullah, the enquiry papers were re-enquired through the then Superintendent of Police, Operation, Mardan. The then Superintendent of Police, Operation, Mardan held responsible the delinquent Officer as he (delinquent Officer) pressurized/compelled Mst: Palwasha to contract marriage with him without her consent.

The delinquent Officer was heard in person in orderly Room on 24.02.2021 but he failed to present any plausible reasons in his defense, therefore, he was issued Final Show Cause Notice to which his reply was received and found unsatisfactory, however, the delinquent Officer was again heard in person in Orderly Room on 30.03.2022, during which he again failed to justify his innocence.

As the delinquent Officer was heard multiple times who sought time to resolve the issue. The Lady was his cousin and he was still persisting with his demand and did not mend his way. Therefore, keeping in view the findings of the enquiry Officer

20

and material on record the delinquent Officer was awarded major punishment of compulsory retirement from service vide OB: No. 843 dated 01.04.2022.

He preferred departmental appeal before the then Regional Police Officer, Mardan and appeared in orderly Room held in this office on 01.06.2022 heard him in person and Superintendent of Police, Investigation, Mardan was asked to submit his report regarding the involvement of appellant in the aforementioned FIR vide this office endorsement No. 3877/ES dated 01.06.2022.

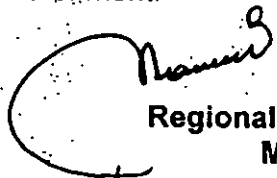
The Superintendent of Police, Investigation, Mardan vide his office Memo: No. 546/PA/Inv: dated 23.08.2022 submitted his report according to which he held responsible the appellant and recommended that appeal of the appellant may be filed.

Hence, the appellant was again called in Orderly Room held in this office on 28.09.2022. In light of aforementioned, report of Superintendent of Police Investigation, Mardan:

From the perusal of ibid report it transpired that the appellant is not letting her cousin at any cost to marry on her own sweet will rather adamant that she will only marry him which clearly shows the nexus of appellant with the commission of offence. Moreover, the involvement of appellant in this heinous criminal case is clearly a stigma on his conduct. Hence, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force as instead of fighting crime, he has himself indulged in criminal activities. He could not present any cogent justification to warrant interference in the order passed by the competent authority.

Keeping in view the above, I, **Muhammad Ali Khan, PSP Regional Police Officer, Mardan**, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

Order Announced.

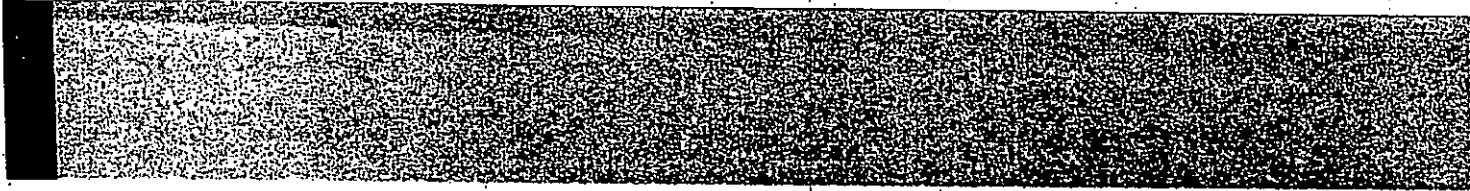


**Regional Police Officer,
Mardan.**

No. 7677-78 IES, Dated Mardan the 03 / 10 /2022.

- 1. Copy forwarded for information and necessary action to the:-
District Police Officer, Mardan w/r to his office Memo: 117/LB dated 17.05.2022, His Service Record is returned herewith.
- 2. Superintendent of Police Investigation, Mardan w/r to his office Memo: No. 546/PA/Inv: dated 23.08.2022.

(*****)



(H) (21)

BEFORE THE PROVINCIAL POLICE OFFICER, KPK PESHAWAR

Sub: MERCY PETITION AGAINST THE ORDER OF DPO MARDAN, ISSUED VIDE O.B NO. 843 DATED 01-04-2022, WHERE BY THE PETITIONER HAS BEEN AWARDED MAJOR PUNISHMENT OF "COMPULSORY RETIREMENT FROM MARDAN POLICE" AND REJECTION OF APPEAL BY REGIONAL POLICE OFFICER, MARDAN ISSUED VIDE HIS OFFICE ENDORSEMENT NO.7677-78/ES DATED: 03-10-2022.

Respected Sir,

The Petitioner humbly submits as under:-

1. It is submitted that the DPO Mardān had issued charge sheet/Statement of allegations vide order No.166/PA dated 29-04-2019 against the petitioner as follows:
" That Constable (Now LHC) Mujeeb-Ullah No.2429, while posted at PS Choorā,now has been charged in a case vide FIR No.492 dated 18-04-2019 U/S 3/4/5 Ghag Act, PS Saddar . "
(Copy of charge sheet+ Statement of allegations are enclosed).
BRIEF FACTS:
2. That one Nisar Khan s/o Dost Muhammad r/o Khazana Dheri, Mardān has submitted an application on **18-04-2019** against the (Petitioner) Mujeeb-Ullah and Zakirullah sons of Niaz Ali and Niaz Ali (father of petitioner) to the effect that the petitioner wants to marry forcibly his daughter **Mst.Palwasha** aged 18/19 years & a student. Mst Palwasha has refused of her own free will to marry the Mujeeb-Ullah (petitioner).That after refusal of his daughter from marriage, the Mujeeb-Ullah and his family members are regularly threatening us with dire consequences. On the basis of this report the FIR No.492 dated 18-04-2019 **U/S 3/4/5 Ghag Act** at PS Saddar has been registered against the petitioner Mujeeb-Ullah, Zakir-Ullah and his father Niaz Ali. **(Copy of FIR is enclosed)**
3. That the petitioner was placed under suspension vide OB No.900 dated 23-04-2019 issued vide endorsement no.2765-69/OSI dated 25-04-2019.Later on the petitioner was re-instated in service provisionally vide OB No.1953 issued vide endorsement No.5768-71/OSI dated 19-09-2019 on account of charging in a/m FIR.
4. That the petitioner has been proceeded against departmentally through **ASP Zia ullah**, the then **SDPO T/Bhi** who submitted his findings report vide his office letter No.1166/ST dated 28-05-2019 and equally held responsible both the parties for the issue and the petitioner was recommended for warning only.
5. That the then DPO Mardān, Sajjad Khan did not agree with the findings of Enquiry Officer and the issue was re-inquired (de-novo) through **Mr.Ayaz Khan**,the then **SP/Inv Mardān** who reiterated the stance of SDPO T/Bhi by recommending warning to the petitioner as well .That consequently the enquiry papers were kept pending by the DPO Mardān, Sajjad Khan on 08-11-2019 till the **Hon'ble Court's decision on the FIR**.
6. That in this connection again a **De-novo departmental Enquiry** was conducted by the DPO Mardān Dr.Zahid ullah and **Mr.Rahim Hussain,SP/Ops Mardān** was nominated as Enquiry Officer who vide his office letter No.46/PA (Ops) dated 11-2-2021 held the petitioner for the alleged misconduct in pursuance of statement of Disciplinary Action / charge sheet No.166/PA dated 29-04-2019.This **de-novo departmental enquiry was of no use and a biased finding was reached on the same issue against the findings of 02 earlier enquiry Officers.**
7. That vide DPO Office letter no. 44/PA dated 25-02-2021 a **"Final Show Cause Notice"** has been issued and the reply of petitioner was considered un-satisfactory during personal hearing conducted on 24-02-2021.However the petitioner was again heard by the DPO Mardān Dr.Zahidullah on 30-03-2022 **but his stance was not considered despite of acquittal by the Honourable court on 03-03-2022 .**
8. That the petitioner has been acquitted from the charges levelled against him alongwith his father and brother by the **Honourable Judicial Magistrate Mardān, Naeem Ullah Jadoon** vide his court order **No.26 dated 03- 03- 2022**. That the court order has been brought into the kind knowledge of DPO Mardān before passing the final order but surprising to mention here that the petitioner has been awarded major punishment of **"compulsory retirement from Mardān Police"** which is against the law & Justice. **(Copy of Court order is enclosed)**

(22)

9. That the DPO Mardan had issued his final order vide OB No.843 dated 01-04-2022 issued office endorsement No.2921-23/PA dated 04-04-2022 and awarded the petitioner with "Major Punishment of compulsory retirement from Mardan Police with immediate effect" despite of acquittal from the charges by the court. (Copy of order OB No.843 is enclosed)
10. That the departmental appeal preferred by the petitioner before the Regional Police Officer, Mardan has been rejected vide his office endorsement No.7677-78/ES dated 03-10-2022 without touching the legal footing of acquittal by the Court from the allegations leveled against the petitioner in the alleged FIR. Hence, the present Mercy Petition before your Honour, please. (Copy of RPO Mardan rejection order is enclosed)

COMPREHENSIVE GROUNDS OF MERCY PETITION:

- a. That the DPO Mardan had issued his final order and awarded the petitioner with "Major Punishment of compulsory retirement from Mardan Police" which is against the law and Police Rules, 1975 because the petitioner has been acquitted by the court of the charges leveled against him. The acquittal order of Court has not been paid any heed in the impugned order which is itself gross illegality and falls under the ambit of contempt of Court proceedings.
- b. That Enquiry Officers Report of ASP Zia ullah, SDPO T/Bhi and Mr. Ayaz Khan, the then SP/Inv Mardan have recommended the petitioner only for warning. The third EO report of Mr. Rahim Hussain, SP/Ops Mardan has held the petitioner responsible for the alleged misconduct which is a biased findings. However, the final order of DPO Mardan is based on the 3rd E.O report. Despite of acquittal by the Court, the petitioner has been given so harsh major punishment which is entirely against the norms of justice and equity.
- c. That the domestic matter was annexed with the Police Career of the petitioner & despite of the fact that petitioner is acquitted of the charges by the Honourable court and still neither DPO Mardan nor RPO Mardan had discussed this aspect in their impugned orders. Domestic differences were made basis for the impugned punishment of the petitioner which could further trigger sense of insecurity among other personnel as well because Police personnel are targeted always by the public on personal differences.
- d. That the petitioner has been acquitted from the charges levelled against him alongwith his father and brother by the Honourable Judicial Magistrate Mardan, Naeem Ullah Jadoon vide his court order No.26 dated 03-03-2022. That the court order has been brought into the kind knowledge of DPO Mardan before passing the final order but surprising to mention here that the petitioner has been awarded major punishment of "compulsory retirement" which is a gross miscarriage of justice and severe negligence on the part of DPO Mardan.
- e. That the Judicial Magistrate is empowered u/s 249-A Cr.PC to acquit the accused at any stage of the case, if after hearing prosecutor and accused, he considers that the charge is groundless or that there is no probability of the accused being convicted of any offence. References: (PLD.2009.SC.102)-(PLJ.2004.SC.2)
- f. It is also apprised that the petitioner has qualified his lower Course in August, 2016. Since then 4/5 times departmental promotion Committee have been formed but the promotion to the next rank by petitioner has not been considered due to a false and concocted criminal case based on domestic issues alone which is an extreme example of biased approach.
- g. That the petitioner has faced prolong criminal trial and has suffered extreme mental & physical torture owing to the lodging of fabricated and concocted a/m criminal case. However, the petitioner has been graced innocent by the court of law. Now departmental proceedings ought to be ended in favour of petitioner rather than take me to task with exemplary harsh punishment of Compulsory retirement from police service that too on baseless allegation.
- h. The petitioner was enlisted in the Mardan police on 09-05-2009. During the whole period of service the petitioner was not dealt departmentally which is evident from the shining service record of the petitioner.

23

PRAYER:

Keeping in view the above facts and circumstances, it is humbly prayed that in the light of instant mercy petition, the impugned order passed by The DPO Mardan by awarding major punishment of "Compulsory retirement from Mardan Police" to the petitioner and rejection of appeal by the Regional Police Officer, Mardan may kindly be set aside and the petitioner may be re-instated in police service along with his back benefits of seniority & fiscal relief, please.

Yours Obediently,

(LHC MUJEEB- ULLAH)

NO.2429

(COMPULSORY RETIRED, MARDAN POLICE)

Dated: 27 October, 2022.



(I)
OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-LHC Mujeeb Ullah No. 2429. The petitioner was awarded major punishment of compulsory retirement from service by DPO Mardan on the allegations that he while posted at PS Chooria was placed under suspension on account of involvement in case FIR No. 492, dated 18.04.2019 u/s 3/4/5 Ghag Act PS Saddar, Mardan. The delinquent official pressurized/compelled Mst. Palwasha to contract marriage with him without her consent. He was heard multiple times & sought time to resolve the issue. The lady was his cousin. He was still persisting with his demand of marriage & did not mend his way.

He was acquitted under section 249-A Cr.PC by Judicial Magistrate Mardan vide court judgment dated 03.03.2022. The Appellate Authority i.e. RPO Mardan rejected his instant appeal.

Meeting of Appellate Board was held on 12.12.2023 wherein petitioner was heard in person. Petitioner contended that that I had family issues.

Perusal of enquiry papers revealed that the allegations leveled against the petitioner has been proved. The petitioner failed to submit any cogent reason in his self-defense. The Board sees no ground and reasons for acceptance of his petition, therefore, his petition is hereby rejected.

Sd/-

AWAL KHAN, PSP

Additional Inspector General of Police,
HQs: Khyber Pakhtunkhwa, Peshawar.

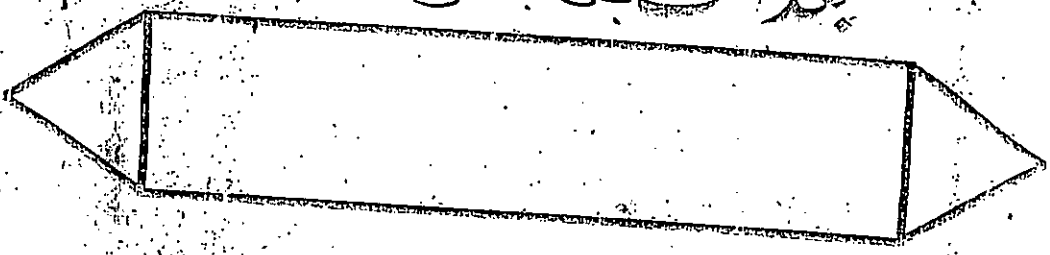
No. S/ 2951-56/23, dated Peshawar, the 22-12-2023.

Copy of the above is forwarded to the:

1. Regional Police Officer Mardan. Service Roll along with Fuji Missal of the above named Ex-LHC received vide your office Memo: No. 9599/1'S; dated 06.12.2022 is returned herewith for your office record.
2. District Police Officer Mardan.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt. E-IV CPO Peshawar.

(MUHAMMAD AZHAR) PSP
AIG/Establishment,
Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

پعدالت جناب سر دستہ کے پاس



2024 منجانب اسم نفل

صاحب الہدیہ
بنام اولیاد
دی ساریہ

مورخہ
مقدمہ
دعویٰ
جریم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

کیلئے لکھنا

آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق اور دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مستوحی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2024

22

المرقوم

Acceptance
B