FORM OF ORDER SHEET

	Ą	ppeal No.	327/2024	
5.No	ite of order	Oder or other pr	roccedings with signature of judge	• •

1 28/02/2024

The appeal of Mr. Subbat Kha presented today by Mr. Taimur Ali Khan Advocate. It is fixed for a periminary hearing before Single Bench at Peshawar on 29.02.2024. Parcha Peshi is given to connsel for the appellant.

By the order of Chairman

REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 327/2024

Subhat Khan

V/S

Police Department

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THROUGH:

APPELLANT

(TAIMUR ALI KHAN) ADVOCATE HIGH COURT 03339390916

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 324 /2024

Suhbat Khan, Ex-IHC No. 3436, Elite Force, Mardan.

(APPELLANT)

VERSUS

1. The Deputy Commandant, Elite Force Khyber Pakhtunkhwa, Peshawar.

(RESPONDENT)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 10.11.2023, WHEREBY THE APPELLANT WAS DISMISSED FROM THE SERVICE AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 10.11.2023 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY KINDLY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPCTFULLY SHEWETH: FACTS:

- 1. That the appellant was appointed in the respondent department as Constable in the year 2007 and has completed all his due training and was promoted to the rank of IHC with the passage of time. The appellant since his appointed has performed his duty with devotion and honesty, whatsoever, assigned to him.
- 2. That an anonymous complaint was filed against IHC Naeem, Ismail and the appellant in which it is stated that these officials with the connivance of his high ups posted constables on their choices of place and took illegal gratification in lieu of that and also took illegal gratification from constables for getting them short/long leave. (Copy of complaint is attached as Annexure-A)
- 3. That charge sheet along with statement of allegations were issued to the appellant in which following charges were levelled against the appellant that while posted as gunner to SP/Elite Force Mardan Region remained involved in corrupt practices and it has been established during the secret probe that he has been receiving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them short/long leave. The appellant submitted detail reply to the charge sheet in which he denied the allegations and clearly mentioned in his reply that he has remained only 04 months with SP/Elite Force and has not involved in corrupt practices and also mentioned that the long leave and short leave is the prerogative of the Deputy Commandant and SP Range respectively and he has no concern with the short/long leave. (Copies of charge sheet along with the statement of allegations and reply are attached as Annexure-B&C)
 - 1. That Mr. Atta Muhammad Khan SP Peshawar Region who was nominated inquiry officer was biased toward the appellant, therefore, the appellant requested to Deputy Commandant Elite Force KP for transfer of inquiry officer, however, the Deputy Commandant Elite Force KP instead of transfer inquiry to another unbiased inquiry officer additionally nominated another inquiry officer Mr. Ijaz Abazai DSP Headquarter Elite Force Peshawar along with already nominated inquiry officer, which is evident from the order dated 26.09.20213. (Copy of order dated 26.09.2023 is attached as Annexure-D)
 - 2. That inquiry was conducted against the appellant in which statements of different officials were recorded in which they clearly mentioned in their statements that no one has demand illegal gratification from them and they are performing their duty honestly, whatsoever, so assigned to them and if any one gave statement against the appellant during the inquiry proceeding, the appellant has not given

opportunity of cross examination of that officials, but despite that the inquiry committee found him guilty. (Copies of inquiry report along with statements are attached as Annexure-E)

- 3. That on the basis of baseless allegation and without issuing show cause notice to the appellant, he was dismissed from service vide order dated 10.11.2023. The appellant being aggrieved form dismissal order dated 10.11.2023 filed departmental appeal on 16.11.2023, which was not responded within the statutory period of ninety days. (Copies of dismissal order dated 10.11.2023 and departmental appeal are attached as Annexure-F&G)
- 4. That the appellant now wants to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUNDS:

- A) That the impugned order dated 10.11.2023 and not taking action on the departmental appeal within statutory period are against the law, facts, norms of justice and material on record, therefore, not tenable and the order impugned dated 10.11.2023 is liable to be set aside.
- B) That no proper and regular inquiry was conducted against the appellant as those officials who has given statements against the appellant which were mentioned by the inquiry committee in its report were not recorded in the presence of the appellant during the inquiry proceeding nor gave opportunity of cross examination to the appellant, which is violation of law and rules and such the impugned order is liable to be set aside.
- C) That the inquiry committee recorded the statements of different officials during the inquiry proceeding in which they clearly mentioned in their statements that no one has demand illegal gratification from them and are performing their duty honestly, whatsoever, so assigned to them, but despite that the inquiry committee established the allegations leveled against the appellant, which means that the appellant has been punished for no fault on his part and as such the impugned order is liable to be set aside on this ground alone.
- D) That all the officials recorded their statements in the favour of the appellant during the inquiry proceeding except someone and that were also recorded not directly against the appellant but against other officials, but despite that the appellant hold responsible by the inquiry committee, which means that the appellant has been punished on presumption basis which is against the norms of justice and fair play.

- E) That one of the allegation leveled against the appellant in the charge sheet while posted as gunner to SP/Elite Force Mardan Region remained involved in corrupt practices, but without specification of any occurrence or event which shows that the appellant is involved in corrupt practices, which means that the appellant was punished on presumption basis which is not permissible under the law and rules.
- F) That another allegation leveled against the appellant in the charge sheet is that it has been established during the secret probe that he has been receiving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them, but grating long leave and short is the authority of high ups and the appellant being IHC (low grade employee of the department) how can he get long leave and short leave for other constable and has no concerned with that and he also stated that in his reply to charge sheet, but despite that he was punished which is against the norms of justice and fair play.
- G) That the allegations leveled against the appellant in the charge sheet is that he remained involved in corrupt practices while remained posted as gunner to SP/Elite Force Mardan Region and receiving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them, but the inquiry committee gave focus on other issues in the inquiry proceeding rather to prove the allegations leveled against the appellant.
- H) That the action was taken against the appellant on anonymous compliant but as per instructions anonymous complaints should normally be filed, but whole action was taken against the appellant on anonymous complaint which means that action taken against the appellant is against the instructions of anonymous complaints as such the impugned order is liable to be set aside.
- I) That in the anonymous compliant, name of other officials has also been mentioned, but no action has taken against them and only appellant was punished without adopting procedure and as such the appellant was discriminated which is clear violation of Article-25 of the Constitution of Pakistan.
- J) That the allegations leveled against the appellant in the charge sheet that it has been established during the secret probe that he has been receiving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them, but as per superior court judgments one can be punished on the basis secret inquiry.
- K) That show cause notice was not issued to the appellant before passing the impugned order which is against the norms of justice and fair play

- L) That the appellant has right of fair defence under Article-10-A of the Constitution of Pakistan which was not observed by the inquiry committee during inquiry proceeding, which is clear violation of Arrticle-10-A of the Constitution of Pakistan.
- M) That the appellant has not been treated in accordance with law and rules and has been condemned unheard throughout.
- N) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on the acceptance of this appeal, the order dated 10.11.2023 may please be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits. Any other remedy which this Honorable Tribunal deems fit and appropriate that may also be awarded in favour of appellant.

Subal Khar APPELLANT Suhbat Khan

THROUGH:

(TAIMER ALI KHAN) ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

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AFFIDAVIT

I, Suhbat Khan, Ex-IHC No. 3436, Elite Force, Mardan, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

Swhbal Kha-DEPONENT

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CHARGE SHEET

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BO

I, Abdus Samad, <u>Deputy Commandant</u>, <u>Elite Force Khyber Pakhtunkhwa</u>, <u>Peshawar</u> as competent authority hereby charge you <u>IHC Suhbat khan No.3436</u> while posted at platoon No.3 gunner to SP/EF Mardan as under:-

- a) That you while posted as gunner to SP/Elite Force Mrdan Region remained involved in corrupt practices.
- b) That it has been established during secret probe that you have been receving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them short/long leave.
- c) That his this act is highly objectionable, against the norms of the Police disciplinary Rules
- d) That your act amounts to gross misconduct and liable to be proceeded against departmentally.
- 1. By reason of the above, you appear to be guilty of misconduct under the Khyber Pakhtunkhwa Police Rules, 1975 (Amended 2014) and have rendered yourself liable to all or any of the penalties specified in the rules.
- 2. You are therefore, directed to submit your defence within 07 days of the receipt of this charge sheet to the enquiry officer.
- 3. Your written defense, if any, should reach the enquiry officer within the specified period failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
- 4. You are directed to intimate whether you desire to be heard in person.

5. A statement of allegations is enclosed.

Deputy Commandant, Elite Force Khyber, Pakhtunkhwa Peshawar.

SUMMARY OF ALLEGATIONS

I, Abdus Samad, Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar as competent authority, am of the opinion that <u>IHC Suhbat Khan 3436</u> posted at platoon No.3 performing duty as gunner to SP Elite Force Mardan Region has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Khyber Pakhtunkhwa Police Rules, 1975 (Amended 2014).

SUMMARY OF ALLEGATIONS

- a) That he while posted as gunner to SP/Elite Force Mrdan Region remained involved in corrupt practices.
- b) That it has been established during secret probe that he has been receiving receiving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them short/long leave.
- c) That his this act is highly objectionable, against the norms of the Police disciplinary Rules
- d) That your act amounts to gross misconduct and liable to be proceeded against departmentally.
- 1. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, Mr. Atta Mohammad Klian SP Peshawar Region is appointed as Enquiry Officer.
- 2. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused official; record statements etc and submit findings within (07 days) of the receipt of this order.
- 3. The accused shall join the proceedings on the date, time, and place fixed by the Enquiry Officer.

(ABPUS SAMAD) PSP Defluty Commandant, Elite Force Khyber Pakhtunkhwa Peshawar.

No. \3281 - 87/EF, dated Peshawar t

15/08/2023

Copy of the above is forwarded to the:-

1. Office Superintendant Elite Force Peshawar.

2. Accountant Elite Force Khyber Pakhtunkhwa Peshawar.

3. OASI/EC/SRC, Elite Force Khyber Pakhtunkhwa Peshawar.

بيان آذان IHC محبت خان بلك نمبر 3436 گنر SP ايليك فورس مر دان ريجن

جناب عالى!

بحوالہ چارشٹ نمبر 87/EF مور خد 2023/09/2023 مور خد 15/09/2023 مجاربیہ وفتر جناب ڈپٹی کمانڈنٹ صاحب ایلیٹ فورس معروض خدمت ہوں کہ میں بطور گنر SP مراد خان ایلیٹ فورس مر دان ریجن کیساتھ ڈیوٹی سرانجام دے رہاہوں۔ جس کا دورانیہ گزشتہ 4ماہ پر محیط ہے۔ اس عرصہ کے دوران دفتر ہذاہے کسی قسم کی پلاٹونز ہذا کی ٹرانسفر پوسٹنگ کا تھم نہیں ہوا۔

علاوہ ازر خصت کلال جناب ڈپٹی کمانڈنٹ صاحب جبکہ رخصت اتفاقیہ جناب SP صاحب کے دائرہ اختیار پر محیط ہے۔ چھٹی پر روائگی بلاٹون کمانڈر اور ڈسٹر کٹ کمانڈر کاکام ہے۔ اس سے میر اکوئی تعلق نہیں ہے اور نہ میں نے کسی سے دشوت کی ہے۔ اس سلسلہ میں مر دان ریجن کے تمام ڈسٹر کٹ کمانڈران نے اپنے اپنے بیانات قلمبند کیے ہے جو ہمراہ لف ہے۔ جبکہ دفتری امور رخصت اتفاقیہ اور دیگر رخصت بائے PA روح الامین کے زیر گر انی SP صاحب سے دسخطی کروا تا ہے۔ جن سے من سائل کا کوئی سروکار نہیں۔ جو کہ اساعیل نائب ریڈر مر دان ریجن میں عرصہ دراز سے تعینات ہے اور مر دان ریجن کے سارے امور رخصت ، تباولہ جات اور دیگر افسران بالاکا تھم واحکام پلاٹونز کمانڈر کو دیتا ہے۔ نائب ریڈر اساعیل اور کاریکل سٹاف نے SP صاحب کے اعتماد کاناجائز فائدہ اٹھاکر جعلی دسخط پر رخصت اور ٹر انسفر و غیرہ کی درخواستوں پر مہر شبت کی تھی۔ جس SP صاحب کو علم ہوا۔ جن کی کاپیال ہمراہ لف ہے۔

نائب ریڈراساعیل اور کلریکل سٹاف کا اس بات کا علم ہوا۔ جس کی بناء پر مذکورین کورنج اور وہم کا سامنا کرنے بعد بد دیا نتی سے گمنام درخواست دائر کرکے جناب SP صاحب کو بدنام کرنے اور مجھ پر بجاالز امات لگا کر پھنسانے کی ناکام کو شش کی۔ اور بید کمپلینٹ تقریبا 120 یوم قبل جناب ڈپٹ کم کمانڈنٹ کے PSO حبیب اللہ خان کے حوالہ ہو کر مختلف پلاٹون سے لڑکوں کو بسلسلہ انکوائری مور خہ تقریبا 129/08/2023 مور خہ 2023/08/2023 طلب کرکے بیانات لئے گئے۔ جس میں میرے خلاف کوئی بھی ثابت نہ ہو سکا جن کی تفصیل ذیل ہے۔

1- آياز خان نمبر 6068 پلاڻون نمبر 26 2- طارق خان نمبر 4356 پلاڻون نمبر 27

3- اسدالله نمبر 2976 يلانون نمبر 31

4 محمد وسيم نمبر 3202 پلاڻون نمبر 30

5- SI گوہر خان پلاٹون نمبر 27

6- LHC داؤدخان نمبر1306 پلاٹون نمبر 30

7- احمد حسين نمبر 1362 پلانون نمبر 26

8- ذيثان نمبر4937 يلانون نمبر 31

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لہذامیرے خلاف متذکرہ بالالگائے گئے الزامات بے بنیاد اور من گھڑت ہے اس میں کوئی سچائی نہیں ہے جس کے پاس کوئی شوت موجو د ہو تو دوران انکو ائری افسر ان بالا کو پیش کرے۔استدعاہے میرے خلاف جو جارج شیٹ جاری ہواہے بغیر کسی محکمانہ کاروائی داخل و فتر کی جائے۔

آپ کا تالع الحکم IHC صحبت حنان بلٹ نمبر 3436 متعینہ گنر SP ایلیٹ فورس مر دان ریجن موبائل نمبر: 9465481-0313



Office of the Deputy Commandant, Elife Force Khyber Pakhtunkhwa Peshawar



No. 13841-43 /116

Dated: 26 1-7 /202

ORDER

Today on 26.09.2023 IHC Suhbat Khan No. 3436 posted at Platoon No. 3 performing duty as gunner to SP Elite Force Mardan Region appeared having some personal grievances to address. As the alleged official is being proceeded departmentally on the charge of involvement in mal-practices, he requested for transfer of the inquiry officer (Mr. Atta Muhammad SP EF Peshawar Region) having certain reservations. The alleged official was patiently heard in detail, during personal hearing he failed to advance any plausible material in support of his stance. However, to address his grievances Mr. Ijaz Abazai DSP HQrs: Elite Force Peshawar is also nominated as Enquiry Officer additionally alongwith EO already nominated to jointly to look into the matter and finalize the instant enquiry on its own merit in collaboration with Mr. Atta Muhammad SP EF Peshawar Region



(ABDES SAMAD) PSP Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar

Copy to the:-

- 1. Superintendent of Police, Elite Force, Feshawar region.
- 2. Deputy Superintendent of Police, Elite Force, HQrs: Peshawar.
- HIC Subbat Khan No. 3436 Platoon No. 3 for information.



Office of the Superintendent of Police, Elite Force Peshawar Region Office No. 091-9223617

/R SP/PR/EF

Commandent Elile Force

Subject:

ENQUIRY

DELIOUENT THE SUHBAT KHAN

R/Sir,

Allegations:

It is submitted that this is departmental enquiry against IHC Suhbat No. 3436 of Elite Force Peshawar Region Platoon No.03, who was issued summary of allegations and charge sheet containing the following charges:-

- a) That he while posted as gunner to Superintendent of Police Elite Force Mardan Region was found involved in corrupt practices.
- b) That it was established during secret probe that he was receiving illegal gratification from the constables of Mardan Region of Elite Force in lieu of getting them short/long leave.
- c) That this act is highly objectionable, against the norms of the Police Disciplinary Rules 1975.
- d) That his act amounts to gross misconduct and liable to be proceeded departmentally.

Proceedings:

I, the undersigned, was officially appointed as enquiry officer by Deputy Commandant Elite Force to conduct a thorough Departmental Enquiry into the aforementioned charges. In order to thoroughly investigate the matter, below mentioned officials were heard in persons and recorded their statements as enclosed for ready reference:-

- 1) Inspector Sardar Hussain Khan, Distt: Commander Elite Force Mardan.
- 2) Inspector Noor Ul Wahab Distt: Commander Elite Force Charsadda.
- 3) SI Gohar Rehman No 361/MR.
- 4) Senior Clerk Rooh Ul Amin, PA to SP Elite Force Mardan Region.
- 5) Computer Operator Salamat Khan.
 - 6) OASI Elite Force Peshawar.
 - ** IHC Suhbat No.3436 (Gunner/alleged)
 - 8) IHC Naeem Khan No.2860, Platoon No.27
 - 9) IHC Zameen Shah No.698, MHC EF Nowshera.
 - 10) IHC Iftikhar Hussain MHC Elite Force Swabi
 - 11) HC Shahid Iqbal No.670, Platoon No.23
 - 12) HC Intikhab Alam No.2026, MHC EF Charsadda.
 - 13) LHC Sabtain No.3802, Platoon No.97
 - 14) HC Tahir Khan No.3684, Platoon No.98
 - 15) FC Rameez No.4819, Platoon No.22
 - 16) FC Muhammad Adil No.1416, Platoon No.23
 - 17) FC Ismail No.1474, Platoon No.74
 - 18) FC Zakria No.3374, Platoon No.17
 - 19) FC Zaheer Abbas No.3848, Platoon No.36
 - 20) FC Tariq No.3071, Plateon No.35

News than-



Throughout the course of the enquiry and the process of recording statements from relevant officials, it was become evident that the involvement of the accused IHC Suhbat Khan in acts of malpractice and corruption is highly substantiated and irrefutable. However, it was worth noted that none of the individuals was involved in instant matter were willing to provide immediate statements based on the merits of the case, primarily due to their apprehension regarding potential repercussions.

Nonetheless, some individuals voluntarily assumed the risk and submitted their statements with the aim of distancing themselves from IHC Suhbat Khan. In the context of this enquiry proceeding, the undersigned enquiry officer, have made the following observations, which are delineated as follows:-

Findings:-

- Initially the posting record of the gunners deployed with Mr. Murad Khan Regional Commander Elite Force Mardan were sought from OASI Elite Force Peshawar, which according to the records, none of the gunners was posted with the respective Regional Commander Elite Force Mardan and that IHC Suhbat is without proper order performing duty as gunner with Regional Commander Mardan Region. Moreover, 08 Police Officials noted below including 03 IHCs were deployed in the name of Regional commander's squad, which according to the statement of Moharrar Elite Force Mardan Region. there is no squad for Regional Commander actually exist:
 - i. IHC Irshad No.3174
 - IHC Iltaf Hussain No.4970 MHC Elite Force Swebi. ii.
 - iii. IHC Fayaz Tahir No.2755 Platoon No.31
 - FC Zaheer Abbas No.3848 Platoon No.36 V iv.
 - FC Muzamil Shah No.2908 Platoon No.28 > V.
 - vi. FC Tariq No.3071 Platoor: No.35
 - vii. FC Sabtain No.3802 Platoon No.97
 - viii. FC Sharns Ul Hadi No.4954 Platoen No.36
- Upon perusal of the record reveals that Daily diary No.26 dated 26.05.2023 at 23:30 hours was incorporated from the side of IHC Suhbat * wherein it was stated that Constables Rameez No 4849 and Adil No.1416 will perform light duty as both the Constables are ill but during course of enquiry it was reveals that it was done for ulterior motive by IHC Suhbat as both the constables verbally admitted monthly payment to IHC Suhbat but did not deposed in statement due to hesitation. It clearly reflects that IHC Subbat was involved in corrupt practices. As per D.D vide No 07 dated 24-07-2023 (copy enclosed), at 11:45 MM Elite NSR reported that information was received through phone call No.03135928801 from IHC Suhbat and stated that constable Wajid No.473 would perform Dak duty.
- 3. Constable Ismail No.1474 in his statement has clearly stated that the alleged IHC Suhbat Khan gave free hand to the following Officials who were not performing official duty and persistently are at their respective homes:
 - i. FC Rameez No.4819, Platoon No.22
 - ii. FC Adil No.1415, EPTC Nowshera
 - iii. FC Sabtain No.3802, Platoon No.97
 - iv. FC Fayaz Tahir No.2755, Platoon No.31



Besides others constable Tahir Khan No.3684 Platoon No.98 deposed that all the RRF Units and Elite Platoons used to collect Rs.500/- per head in each month to pay to IHC Suhbat Khan.

- 4. Inspector Sardar Hussain, District Commander Elite Force Mardan in his statement also deposed that information report prepared on his behalf and enclosed with the statement of IHC Suhbat has neither handed over to him nor scribed by him rather the same was submitted to Regional Commander, adding that his fuel card is already in use of Mr. Murad Khan Regional Commander Elite Force Mardan still is in his possession.
- 5. Inspector Noor Ul Wahab, the District Commander Elite Force Charsadda, provided a clear and formal statement regarding the assessment of personnel strength within the District Commander Elite Force Charsadda. It was ascertained that Constable Sabtain No.3802 was previously assigned the role of gunner under the supervision of SI Gohar Rehman, the than District Commander Elite Force Charsadda. MHC Elite Force Charsadda, IHC Intikhab Alam, reported that the aforementioned constable had previously fulfilled duties as a gunner under the purview of the District Commander in Charsadda. Consequently, it has been determined that he shall continue to serve duty as a gunner under his command. Subsequently, there was a consistent requirement for the said constable to fulfill his duties in this role. However, it was reflected during the course of enquiry that the constable, leveraging certain influences, communicated to Inspector Noor Ul Wahab through higher channels, asserting that he should not have been summoned for duty.
- 6. SI Gohar Rehman, No. 361/MR, stated in his statement that during his tenure as the District Commander Elite Force in Swabi, Murad Khan, the Regional Commander Elite Force Mardan, directed that FC Sabatin, No. 3802, of Elite Platoon No. 97 District Charsadda be deputed to serve as Gunner to the District Commander Elite Force Charsadda. It was explicitly communicated that the aforementioned FC has to be on leave from gunner duties and was not to be involved in any gunner-related tasks. On the 07-06-2023, SI Gohar Rehman was transferred from District Commander Elite Force Charsadda to Elite Platoon No. 27 District Mardan.
- 7. Constable Zakaria No.3374 clearly in his stated statement that he has been performing driver duty with the District Commander Elite Force Charsadda for about 08/09 months. As per the orders of High-ups the district commander, has been approved 100 liters of diesel from the Elite headquarters Peshawar for pick-up official vehicle number 9811. On the orders of Moharrar Elite Force Charsadda Intikhab Alam, amount of 50 liters of diesel out of 100 liters were handed over to the IHC Suhbat, Gunner of SP Murad Khan and the same was brought into the notice of the district commander Elite Force Charsadda. Similarly, on the first day of every month, Gunner IHC Suhbat used to pay amount of 50 liters of diesel which would have been around Rs.15000 and if the price of diesel had increased, the price would have been Rs.16000/17000.

- 8. All the allegations made by accused IHC Suhbat in his written statement/ reply of charge sheet were thoroughly investigated, therein it was found that the accused official made false statements to divert the enquiry in his defense as well as during the course of enquiry on written application of accused IHC Suhbat Khan, DSP Headquarters Elite Force Mr. Ijaz Abazai was additionally appointed as co-enquiry officer vide letter No. 13841-43/EF dated 26-09-2023.
- 9. Throughout the course of the inquiry, it has been presumed from all the testimonies that the various instances of corruption and unauthorized transfer/postings predominantly commenced subsequent to the appointment of Mr. Murad Khan as the Regional Commander Elite Force in Mardan. It is implausible that he remained entirely oblivious to the occurrences of illegal transfer postings and corrupt practices. It is indeed remarkable that, over this protracted duration, the Regional Commander Elite Force Mardan Region neither has instigated any legal measures against these illegal transfers/postings nor communicated relevant information higher authorities.
 - 10. During the course of enquiry, it was noted through a comprehensive assessment that Regional Commander Elite Force Mardan Region was engaged in corrupt practices with his gunner IHC Suhbat, especially while involving subordinates within his jurisdiction for receiving bribe etc, presents a situation fraught with uncertainty. Consequently, a substantial portion of the Elite Force personnel stationed within the Mardan Region harbor the belief that such corrupt practices was facilitated with the tacit support of senior ranking officers of Elite Force Khyber Pakhtunkhwa.



- 11. A Special Branch report regarding Regional Commander Elite Force Mardan Mr. Murad Khan and accused Official IHC Suhbat has also been sought form Special Branch.
- 12. During tracing the records of CDRs of all the officials who were transferred/posted illegally were also investigated, which proved that Officials of SP Squad were present in their native villages thorough out the period. (Summery of all cellular data are enclosed).
- 13. As far as Mr. Murad Khan, SP Elite Force Mardan Region is concerned, during the inquiry it has also been clearly revealed that the Regional Commander Mardan has a weak supervision due to the following reasons:
 - a. For so long, his gunner has been inciting the entire elite force for corruption through various means, why no action has been taken against him.
 - b. If this corruption is only a personal act of his gunner IHC Suhbat, then why didn't SP Murad Khan know about the increase or decrease in the Elite personnel during the inspection of the districts in such a long time? Whereas the office of Regional Commander Murad Khan has informed the higher officials in all these informal visits that the strength of Elite Force throughout the region is complete.
 - c. For what purpose the SP Elite Mardan Region took possession of the monthly petrol card from Inspector Sardar Khan, District Commander Elite Mardan Region.

- e. As a Gunnar IHC Suhbat has made all the appointments in Mardan region on his authority, why SP Murad Khan was not responsive of it?
- f. That during the inquiry, accused IHC Suhbat blamed constable Ismail No. 1474 of using forged signature of Regional Commander Mardan, which was later proved to be false, why neither this act brought to the notice of the higher officers in time before the inquiry nor SP Elite Mardan himself as the Regional commander take any action against FC Ismail at that time?
- 14. The police department functions primarily as an institution dedicated to upholding regulations and maintaining discipline. Within this framework, where senior officers are duty-bound to abide by the law, it is imperative that subordinates possess the right to abstain from any unlawful activities and, rather, have the prerogative to report such transgressions to their higher-ranking authorities. Being an Inquiry Officer, I hereby submit the following recommendations of Lower Subordinates for the initiation of separate departmental proceedings. These proceedings are warranted due to the direct or indirect involvement of certain individuals in acts of corruption:
 - a. IHC Irshad No.3174 Platoon-28
 - b. IHC Fayaz Tahir No.2755 Platoon-31
 - c. MHC Intikhab Alam No. 2026, MHC Elite District Charsadda.
 - d. MHC Altaf Hussain No.4970, MHC District Swabi.
 - e. FC Tariq No.3071 Platoon-35
 - f. FC Shams UI Hadi No.4954 Platoon-36
 - g. FC Sabtain No. 3802 Platoon-97
 - h. FC Zaheer Abbas No.3848 Platoon-36
 - i. FC Muzamil No. 2908 Platoon-28
 - j- FC Wajid No.473 Platoon-22

Conclusion:

After going through the statements of all concerned and other connected a material available on record it has been clearly stand proved during the course of enquiry that accused IHC Suhbat has committed the offences of corrupt/malpractices and the charges framed against him are fully established.

Submitted Please.

Inquiry Officer,

(ATTA MUHAMMAD)
Superintendent of Police,
Elite Force, Peshawar Range.

Co-Inquiry Officer,

(IXAZ KHANNABAZAI)
Deputy Superintentient of Police,
HOrs, Elite Force KP, Peshawar.

Will chick the Sa want phis 113, who w Wor do a grading to wolls 138 W 03 W 31 C gollaw (13 54) 11 3 59 36 Uit 01 /4 (13 & 10 CO TO WOW (10 C) 10 C 45 coly مر باس وود ما من دستر المار المع والمرابع المرابع المر ے دینرٹ کیلائ کھی زرقی کا ڈی مل کھی سرطری کا ٹری می آور کھی کھیا ، سى مير ساق مي رفس مي کي ويولی کی په رساس کا و ميا اس س زی ریدر ساف می کام کری تی دیمطی و عبره رساف می کام کری تی دیگی Sold I in 1He sol of wife when I is an Elin Chies 13 & City for Com of or City is the

15 July 8/ RRF ivens SI 02/10 5007 10 h الالدك عومِ مَن مِن أنسِل سطِن بلاون 19 كما المتمار عارے سی جنا۔ عوصاص ایسٹ ورس وردن رہے فرارفان ے من ای کو سر صیفت گنر مسیما تھا اور ساتھ دی سر تاکیری کھی المستمل وركوره بالاكوس أب كوبر صيبت مرسيت مرسيت المرسين -للن مذكور مالانتظم ساتو ايكاكوني سروكار نيس مركا عفدا مه محو سروود سوما عما - اور صراح 100 حرور وسكا فيها نما ولم دل سرات عاندو مناه جارسان سے بلا ولی 27 ملع اردار مان سے ملا ولی 27 ملع اردار مان سے ملا ولی مقت برس سے ملا موں۔ یک صرابیان سے ور مفتقت برس سے SY/10-RRF-UT SWABI 02-10-2023 (0) 15 (1) . [[23 05] . [[23 05] . [[2]] . [

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سان اذال دوح المس سنرمكرا أف المحمل المث ور ودان ين

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ما ار در سیمیل می منا با ۱۹۶۹ سے روا تا ہوں در صف و نمرہ من سی مسئو کر تا ہوں میں منا کے اللہ میں مسئو کر تا ہو میں مسئور کر تا ہوں ، محبت خا حباب علی اللہ میں میرا سا لی حد دفیری کا میں مداخلت منسوا کرتا ہے ، کیسی میرا سا لی حد مورد مفتحت ہے میں)

(4)

ر ارمر سلامت مان مروض مدمن سول کم می مطر تدور ایر مر آ می ایک رملی وزی ور سلامه می اوی که کسی هی سرکاری رکور می عر رفع رسی یی -المحالية على مع درواس كا مع من وروس ما وروس من المحالية ك بي الورد رك يسم كا كريس ارشوت ي بدار مر فلاف كا) رقن من الله و رؤالا د د و الم الله الم الله الم الله نى لا سى ماسى خىرى كر شى كار بركوس رسى العالى كالحريمة a con rais ge un la Cro ייין ואיין כא الله وران ودان

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والريواري لفظات علا معروض عرمت بول كرمن علوا الله ودفول عنى 72 موكر تعالم ماتى دى مين لفيها ت سے د اور مين جوكيوں مرتقبر ع امرى عدا في فروس فيست سكن كالمر دون رافع ما درايول على اي دُين ا علماري ا مؤسس العرب الباح مع راباح مع راباع مع الباح مع راباع مع الباح مع راباع مع الباح مع الباح رمين دفتر مردان سروي علم الحاس طفيه ما المساكر يودنون كاندر عه دي ديون العام/ را مع مرانام دما يون د ادرك المعادل ويون ا محوس حاسًا سرل Social Ray Con Colyst you ~ و مرا مار سے . حوار قعسا برس سے . بن آران ہے על אוענט אין דב מעוני

So so soul 3 the object of the house

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والرمسول بروانه برى 393 فارم خاب على المن لهم كوافر ليشاور مدوض مذمت بول. كر مرا تبا دلم تو با دوسف بك 21/2/2/ JA Coll of 11 07 00 9714-24/pasiEF U/2/3/1/45 سے قرر اللی فررس و جرح ہوا۔ اسران الاحاصان کے حکم ک نقبل رق ہے وہ فی 12 وہ اگر اور الروال کا من کست قرطفرى - اوران دول ورى ديا ناراى كاسا توشرع كى. ولم ملائن أو المه من دو المرافرة الملك أوى أورائب و من RRF نوى قينات تقى . و كى فطوكتاب اور ديفارد تلىل كلى صب المع انسران الإله لله عدد ونو مد قرران لعنات تع . جوسم سائر ليول مرا عام د ته ربع علاه ازين عياميل آمير على كا بوال آردر EPTC (150 die 2018/104 07 07 07 12847-52/EFC) JUN 113 9 136/10 03 10 Al 5 com - 1/5/1/3 co 8/2/5/ اور معد بعدى فارع مندل كوداع دفي عقوع روانكى - يى حرا سان بع جوم درست امر حصفیت برطن کے - زمین شاہ عظا

21-09-023

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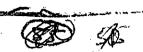
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عروم فروت برل ارف علا السطركن من والرك مررضات أزرو مات فهلم حارسره كساكو والورى مسرانام در را مول جسلی لعدر فی حنات و مشرک الرارس كي حاسكي ع من علا يروعي الراع عالر كرك بين سراسر في الما والعرف المرسي في الم من يالنا في في في في السيول كالمن رسيبي اور نری اس ار برمی مقلوماند عدام نراز اوات ميد ميار اور عالما يس M. M. Jan S 9>039/380200 03449338979 = NOC 0318 6946590.



الله بران كسيل دميم بي ١١٩١٩ بلالون مر 22

سروه و دست بروک پلاؤن فر عدم مشنب دشهره بولین دان س دیون سرناح. ، با به تواج مقرمرعلن فر کاالا مورم 16 ماه کمال مرورم 100 مراح و الا تما مذ الوڑہ فلے دوران چاہدنی حجم فلف حسوں برتکے توسل مر زعی دیانی جوده سه سال کا د آمیرو ن جامیان عضور الدلين كا سائل مب معولى عبيب بو الذسائل الله ذرل كا يد كيا مَعْ و د د ما ما الل ك د د باره لعلف فحسوس بورا سائل جد درباره قُراد صامع عرا من تبانو و آخر صعد و داشت ووق ته اصلان بالاصام، ساد تو سيش آية أو الح مادر الميث نورس مرون مرادمان سايما ت س ٢٠١٢ كا دائل دُيون ادر اد بن كرستن امر قرر صامر دوستر ادر دسرله کار د شهر المها فوران مادر شا

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مرانت مان کرما مرف که نوشیج کورکس لین بدان فردد ؟ یر لفزنی تھا اور ایس سے قبل ازس می منزل جل النار لولون لروع من لفات تھا۔ موی رکوان فری ال وطراع فا كرائه من فروس رموا المبائث موا Jujul by below Oid fre with سی کیا کیا ہے۔ کوجہ سیاری میں روز مسیم ابن دکھی کسالے 0/2/1-65 th 2 & cl 2 & cl 15 15/18 Will- with ill julisty Julisty 13501-13504/FULLISTUS NICH من من المران المرف المران المرف من ما ما على المران المرف المران المرف المران المرف المران - بی سرابان یا جرکردس ہے e with of the distants

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35/600 N43071+016 K EU151UL معروس مرست سول کر میں سائل مرزور عر35 سے صیافہ مرع عداقب فردان الحن مراد على كوالم مد 5 روزما في 80 العرف كنر عقيه عمامين موصوب روانه بیوکر تاطار گرند دیدی بر تفسات موں اس دول فن 9 2 gal d frest on Still for con 6 5 P ی توی رقعم صغیرہ سی ری سے رہی ڈہوئی کی جے۔ سی میر سان ما وقد صعب الرمني ع 0313-8330225

Office of the Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar

No. 1 70 8 - 2 AF

Dated: \0/19/2023

ORDER

This order will dispose of departmental enquiry against IHC Sohbat No.3436 who was proceeded departmentally under Police Disciplinary rules 1975 on the charge of involvement in malpractice and receiving illegal gratification from the constable of Mardan Region in lieu of granting them short and long leave. Summary of allegation and charge sheet was issued to him and Mr.Atta Mohammad Khan SP Peshawar Region was appointed as enquiry officer. Later on Mr.Ijaz Abbazai DSP HQrs: EF was also appointed as additional enquiry officer to thorough probe into the matter.

The E.Os during the course of enquiry recorded statements of all concerned and the accused official as well. On conclusion of enquiry the charges framed against the accused official were established and finding report was submitted for its finalization.

He was heard in OR and the relevant record along with his statement perused. He failed to submit any plausible justification in his defense. Therefore, under police rules 1975 with amended rules 2014, the under-signed is competent authority to dispose of the instant enquiry on its own merit. Therefore he is hereby awarded the major punishment of **Dismissal from service** with immediate effect.

(ABDUS SAMAD)PSP
Deputy Commandant
Elite Force, Khyber Pakhtunkhwa
Peshawar.

Copy of the above is forwarded for information to the:-

- 6. Addl:IGP Elite Force Khyber Pakhtunkhwa
- 7. SP.HQrs: Elite Force Peshawar with the direction to initiate departmental proceedings against official mentioned on the last page of Enquiry report from S.No.a to j, hence complete enquiry file is enclosed.
- 8. SP/Peshawar Region
- 9. SP.Mardan Region
- 10.Office Supdt: /EF
- 11.Accountant/EF
- 12.OASI/EF.CRC.FMC and all concerned.

Endicited Pedes (File)

17/19/2

ن كدر والمعالى الماسي الدى المنسائي الإوالخ تنخ بهيئ بعارا بأخيا اب المدنة لأبال لاب لت المعدمة 26=11=31 -00 0665 ou or

10.11.2023 جائية في 17018-26 بأياد المايية في 17018-26 بأياد المايية في 17018 من 1903 بالمايية في 1903 بالمايية في 1903 بالمايية في 1903 بالماية بين المايية في 1904 بالماية بين المايية ب

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בשיום ל לב راجة O.R של ביל וזל בי ݣاء الله كي بالمالان بك الله المناه المناع المناه المناع عرضه سياري الدك فالمنابخ والحرون في الحرك المالان المرحد العراد المعدورة الدماي المعابي الدالا

ا فاقترا

٧٤٤٠٤ - ٩-١٤٠٤ كانا فالماريخ الماريخ الاراعاء في مندار كاليام ميدادان بي ملادان حراره والمدهد ملي كالمستدون لي الدوري المراد لازاء أيد كالميان المناف الماد المان المناف المناف المراد المام المراح المياب والماد الماد المان المناف المناف الدافيه والاساف الفائد الفارد ووالألكاء لادار الماسان المارين المارين المحاهد ٤٠٠٠ و و الدين الدين الدين الداله الديد عنول الالك المائي المائية والمناد المالال المالاك من الاركم والمنا الله المارية المادين المادين المادين المادين الماديد المادير الماديد الماديرة الماديد الماديرة الماديد الماديرة Preliminary) حالية والمبرئي حق ل حداثا الما الم لي المداد إلى الاخط حق ين يود لذ مي يوال المناسبة. عراها المان كران بالماد المارك المالالا الألاال المراد المارين المارين المارين المارية بنبك البراي الدائد المعالا لمعالي المعارية المعارية الماء المعارية المعارية المعارية المعارية المعارية

نگناڭ Formal Departmental Enquiry جاڭدىي،ك (Preliminary Enquiry) كالالاساء

134

و بل ملاز مین کے بیانات جومیرے تن میں ہیں انکوائری آفیسرنے تالمبند کیئے۔

ن سے بہانات بولیر ہے ں بن ہیں الوائر ق البھر ہے سبدھے۔	י בייטעולי
FO محمه عادل للسفيمل نمبر 1416 بلاثون نمبر 23 لوشيره	1
FC رميزخان تنشيل نمبر 4819 پلاڻون نمبر 22 لوشهره	2
HC طاہرخان نمبر 3684 ہلاٹون نمبر 98 جارسدہ	3
السيكثر سرور حسين خان وسركث كما عثر رمروان	4
ای موہرخان ڈسٹرکٹ چارسدہ	5
FC سبطين نمبر 3802 پادتون نمبر 97 چارسده	6
FC ذكريا غبر 3374 وْ دَا تَعُونُسْلُعْ جِارِسِدِه	7
جناب محترم مرادخان SP مها حب ایلیدنی نورس پیثاور	8
PA to SP/Mardan Region כני שוֹשׁשׁטוּ	9
LHC الطاف حسين غبر 4970 بلاثون غمبر 35 مواني	10
FC محمد طارق 3071 بلا تون نبر 35 صوالي	11
FC ظهيرهباس نمبر 3848 پلاڻون نمبر 36 صوابي	12

مندرجہ بالا الازمین کے بیانات فلوا عماز میں پیش کیئے جا کرائوائری آفیسر نے اُسکے بیانات میرے فلاف بطور بوت الزامات کے تائیدیش کیئے

ایس تاکہ میری گرفت ہوکر قابل مواخذہ برائے عطا کی سز انکمانہ گروانا جائے مرصور تمال اسکے برعکس ہیں ، مالانکہ میں بالکل ہے گئاہ ہول۔

مزید ہے کہ مندرجہ ذیل ملاز میں جوحق میں بیان و بینے کی حمایتی ہیں سرا سرا کو قلمبند بیا تات کیلئے طلب نہیں کیے کیئے۔ جنکے بیاتات نہاں تا ایمان اور کے میں ایسانہیں کیا گیا۔

ولازی ہے کہ جنکے انکوائری میں ایسانہیں کیا گیا۔

قارال کھانہ کاروائی کی تحیل ہوکر بھوالہ لیز ترین نمبر 437/R,SP/R/EF مورد 17.10.2023 کوائوائری آفران عطاحمہ SP مادن E.O جناب ڈپٹی کمائڈٹ ایلیٹ فور آخیبر صاحب پٹاور دی معاون E.O جناب انجاز خان ابازائی DSP/HQrs, EF پٹاوٹ کو بنا ہے جناب ڈپٹی کمائڈٹ ایلیٹ فور آخیبر پٹونو نو اور کو مرسل کیا جنہوں نے چارج شید ، سمری افزانات دیکرسائیل فائل شوکا زو ٹس نمیں دیا ۔ نہ ہی اروئی روم میں پٹی کیا اور نہ تا کہ اور ایک خور میں میں کھڑت بہ بنیاد ایس منائی کا موقع دیا اور بیک فلم من کھڑت بہ بنیاد ایس موقی کا موقع دیا اور بیک فلم کوش مائیل کو طلاز مت سبکدوش کیا ۔ سائیل کے چھوٹے چھوٹے بچواور ایپ کنبہ فائدان کا وحد کیل ہے ہیں ۔ مرف واتی عزاد کے بناء پر فلم کا نشانہ بنا کر معاشی طور مقلوج کیا ۔ سائیل کے چھوٹے چھوٹے بچواور جسکو فلط رنگ دیکرسائیل نا قائل ۔ ویکرکوئی معاش ورائع آ مدن تیس ، " مقائق چپ نہیں سکتے بناوٹ کے صولوں سے "اصل مقائق کی کھراور جسکو فلط رنگ دیکرسائیل نا قائل ۔ ویکن فقعان کو بچھا ۔

آپ ماحبان سے مدرواندا بیل کرتا ہوں کدمندرجہ بالامعروضات پرانساف برجی نگاہ ڈاکٹرسائیل کواپی طازمت معدجمد مفاوات پر بحال فرمادیں، برطرفی تھم کالعم ومنسوخ فرمادیں۔الرقوم 16.11.2023

Du Nort neper

سابقه ۱HC محبت خان نمبر 3436 ولدمريز خان سكنه تحر اكذب پايان پشاور موبائيل فون نمبر 0313-9465481 مدوبائيل فون نمبر 1032 - 302 - 030

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VAKALAT NAMA

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IN THE COURT OF KP	Service	Tribural	Palawa
Sahba	& Khan		(Appellant)
		:	(Petitioner) (Plaintiff)
Poli	VERSI VE DE LA	is retment	(Respondent)
			(Defendant)
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Counsel/Advocate in the about with the authority to engage/s I/We authorize the said Advocates and amounts payable of the Advocate/Counsel is als proceedings, if his any fee left	appoint any other cate to deposit, w r deposited on m so at liberty to l	Advocate/Counsel of withdraw and receive y/our account in the eave my/our case a	n my/our costs. on my/our behalf all above noted matter. It any stage of the
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