

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No: 463/24

Majid Ullah S/o Nasrullah Capital City Police Peshawar

.....appellant

VERSUS

Inspector General Of Police And Others

.....Respondents


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Dated: 09/05/2024


Appellant

Through


Muhammad Ishaq
Advocate, Peshawar

13-05-24
Peshawar

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK PESHAWAR

Application No: _____/2024

Service Appeal No: 463/24

Majid Ullah S/o Nasrullah Capital City Police Peshawar

.....appellant

VERSUS

Inspector General Of Police And Others

.....Respondents

Application for place on file required relevant documents

Khyber Pakhtunkhwa
Service Tribunal

Respectfully Sheweth,

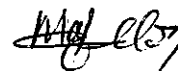
Diary No. 12688

Dated 10-05-24

1. That the above case is pending for adjudication before this honorable tribunal.
2. That the next date is fixed for hearing on 13-05-2024.
3. That the honorable tribunal has already ordered to keep/place on file the annexed document for proper adjudication into the subject matter, hence the instant application.

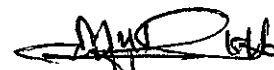
It is therefore humbly prayed that on acceptance of this application the relevant documents may please be placed on record.

Dated: 09/05/2024



Appellant

Through



Muhammad Ishaq
Advocate Peshawar

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK PESHAWAR

Application No: _____/2024

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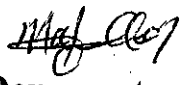
VERSUS


Inspector General Of Police And Others

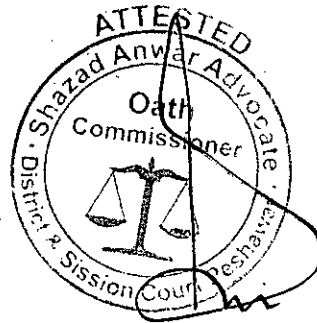
.....Respondents

AFFIDAVIT:

It is verified on oath that the contents of this application is true to the best of my belief and knowledge and nothing has been concealed from this honorable tribunal.


Deponent

Identified by:

Muhammad Ishaq
Advocate Peshawar



01-05-2024

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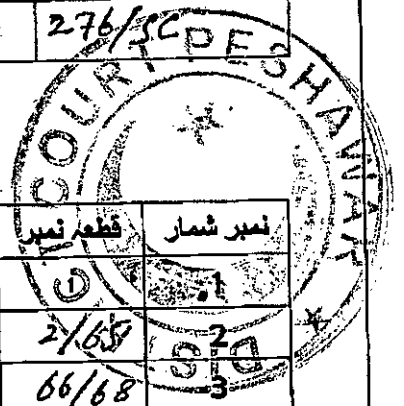
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بعدالت جناب سید عارف شاہ ایڈیشنل ڈسٹرکٹ اینڈ سیشن صاحب پشاور VII

مقدمہ نمبر	رجوعہ	اصل رجوعہ	ایضاح	تفصیلات
276/3	20-2-22	30-5-19	2-5-23	313

بنام عابد اللہ

رکار



نوعیت قطععات	تعداد قطععات	فہرست نمبر	نمبر شمار
انڈکس ہذا	1		1
آرشیٹ ہائے + ٹیکسٹ	64	2/65	2
چارج شیٹ + وارنٹ ریفرنس	3	66/68	3
بیانات ہائے	70	69/138	4
مثل جوڈیشن	54	138/182	5
وکالت نامہ	2	193/194	6
اوریجنل سٹامپ	3	195/197	7
درخواست ریل ٹیکسٹ + بیانات	6	198/203	8
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عابد اللہ ولد فقیر اللہ مندر مہر ضلع فتح پور

حالیہ

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Session Court Peshawar

2) عمر 45/46 سال

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رقیب واپس 03009345983

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EX. P. W. 10
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IN THE COURT OF SYED ARIF SHAH
ADDITIONAL SESSIONS JUDGE-VII, PESHAWAR.

Serial No. Of Order or Proceedings	Date of Order or proceedings	Order or other proceedings with Signature of Judge Or Magistrate and that of parties or counsel, where necessary
1	2	3
		<p><u>CASE FILE# 276/SC OF 2019</u></p> <p>Date of Receipt of Challan:.....03-05-2019 Date of Decision:.....02-05-2023</p> <p>The State through Muhammad Shahid s/o Ashraf Khan r/o Badaber, Balo Khel Payan, Peshawar.(Complainant)</p> <p style="text-align: center;">---V E R S U S---</p> <p>1. Abid Ullah and 2. Majid Ullah both sons of Nasrullah r/o Mohallah Balo Khel, Peshawar. (In Custody)(Accused facing trial)</p> <p>3. Zakir Hussain s/o Nasrullah r/o Mohallah Balo Khel, Peshawar.(Absconding Accused)</p> <hr/> <p><u>JUDGMENT: -</u> 2nd May, 2023</p> <p style="text-align: right;"><i>Attested and</i></p> <p style="text-align: center;">Accused <i>Abid Ullah and Majid Ullah</i> are facing trial before this court in connection with case FIR No.540 dated 27-06-2015 registered U/S 302-34-PPC at Police Station Badaber, Peshawar.</p> <p>2. Epigrammatic facts as per FIR are that, complainant <i>Muhammad Shahid s/o Ashraf Khan</i> reported the matter through murasila in shape of the FIR that, on the eventful day he along with his cousin brother namely Hidayat Ullah were</p>

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 AD & SJ-VII, Peshawar

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on the way to their houses; wherein, both the deceased namely Farid Ullah Khan (brother of complainant) along with Waqar alias Malang (neighbor) were also on the way towards the houses and were ahead of the complainant and his cousin brother holding household commodities, when reached to the spot, suddenly accused Abid, Zakir Hussain (absconding) and Majid while armed with deadly weapons came and started firing at his deceased brother and Malang as well as on them; as a result of the firing of the accused, his deceased brother and neighbor sustained injuries and fell down on the ground whereas, the accused decamped from the spot. The deceased with the help of Illaqa Makeen were rushed to the LRH but in way to the hospital, the injured succumbed to the injuries and died. Motive behind the occurrence is some grappling/altercation had taken place prior to the occurrence. After complying all the codal formalities, the dead bodies were escorted to mortuary at Khyber Medical College, Peshawar for post-mortem examination and FIR was registered accordingly.

3. After completion of investigation, initially challan u/s 512 Cr.PC was put in court on 11-02-2017 and they were declared as POs on 28-02-2018 by then learned AD&SJ-XIII, Peshawar. Later on, accused Majid Ullah and Abid Ullah were arrested and the complete challan against the accused facing trial was put in court on 30-04-2019. Provisions of Section 265-C Cr.PC were complied with and charge against the accused facing trial was framed on 24-05-2019 to which accused facing trial pleaded not guilty and claimed trial and prosecution was directed to produce its evidence which it did accordingly and prosecution produced as many as Fifteen (15) witnesses in support of its case while rest of the PWs were abandoned being unnecessary. Statements of the prosecution witnesses is reproduce below in verbatim:-

PW-1, statement of Qayyum Khan SHO P.S

Sarband, Peshawar on oath:-

"During the days of occurrence, I was SHO P.S Badaber

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and on completion of investigation, I submitted challan against the accused facing trial Abid Ali." (S)

PW-2, statement of Abdul Wahab ASI, P.S Badaber,

Peshawar on oath:-

"Stated that I am marginal witness to the recovery memo/identification memo Ex-PW2/2 vide which in my presence during interrogation the accused disclosed that the Kalashnikov which were recovered in case FIR No. 194 dated 21-03-2019 from his possession is the same which was used by him in the instant case. The said Kalashnikov bearing No. 19058007 was handed over to the I.O by Moharrar of P.S in my presence. The same was sealed in parcel No. 05 by affixing 3/3 monogram in the name K.D. Similarly, I am also marginal witness to the pointation memo Ex-PW2/2 vide which the accused led the police party to the spot and pointed out the point of his presence at the time of occurrence."

PW-3, statement of Zarall Khan No. 426 P.S Mathra,

Peshawar on oath:-

"Stated that during the days of occurrence, I was posted in P.S Badaber, Peshawar. I escorted the dead body of deceased Waqar. From the spot to KMC nobody interfering during escort after PM examination, I handed over the dead body to the LRs of the deceased and the garments of the deceased were handed over to I.O. In this respect, I.O recorded my statement w/s 161 Cr.PC."

PW-4, statement of Zahoor Khan ASI of P.S East

Cantt, Peshawar on oath:-

"During the days of occurrence I was posted as SHO of P.S Badaber. Accused Abid Ullah and Majid Ullah sons of Nasrullah were Pos in the instant case and after the arrest, both the accused were handed over to me for the purpose of investigation. On next day of the arrest both the accused vide my application Ex-PW4/1 for police custody whereby two days police custody was granted. During the course of custody, accused Abid Ullah properly interrogated and he has rightly pointed out the recovered weapons from his possession and disclosed that the offence was committed through the said weapon. (STO by the learned defense counsel that this portion of the statement is amount to discloser of an accused to the police which is hit by Article 37, 38 of Qanoon e Shahdat therefore, inadmissible in evidence). In this respect, I prepared fard identification recovery memo in the

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presence of marginal witnesses which is Ex-PW4/2. Accused Abid Ullah also made out pointation of the place of occurrence in the presence of marginal witnesses and in this regard I prepared the pointation memo Ex-PW4/3. (STO by learned defense counsel that the same is hit by Article 40 of Qanoon e Shahdat, hence, inadmissible in the evidence). I also recorded the statement of marginal witnesses u/s 161 Cr.PC and similarly I also recorded the statement of accused Abid Ullah u/s 161 Cr.PC. On 23-03-2019 I also sent the recovered Kalashnikov for Armourer opinion/examination vide my application Ex-PW4/4 and on the same day, opinion was also taken from the concerned Armourer on the said application. During custody, accused Majid Ullah was also interrogated but he was reluctant to the extent of offence. After completion of police custody I produced both the accused on two different applications. Accused Abid Ullah was produced for recording his confessional statement vide my application Ex-PW4/5 where he denied his confession and was sent to judicial lockup while accused Majid Ullah was produced for further custody vide my application Ex-PW4/6. The same was declined and both the accused were sent to judicial lockup. During the course of investigation, the recovered Kalashnikov from the possession of accused Abid Ullah was also sent to fir arm expert and in this regard, the report of exper was obtained and placed on file which is Ex-PW4/7. After completion of investigation, I submitted the case file to the SHO concerned for submission of supplementary challan against both the accused. Supplementary challan was submitted by SHO Qayyum Khan being my senior. Today, I have seen the supplementary challan duly signed by him and I verify the signature over the challan which is Ex-PW4/8. Today, I have seen all the above mentioned documents which are correct and correctly bears my signature."

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Re-Examination of PW-4 Zahoor Khan ASI P.S

Town, Peshawar on oath:-

"Today, the weapon offence i.e. Kalashnikov produced before the court as Ex-PK in sealed condition. (STO by the learned defense counsel that there is no evidence that this Kalashnikov is a weapon of offence).

PW-5, statement of Sher Ahmad SI P.S Inqilab,

Peshawar on oath:-

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"Stated that during those days I was posted as ASI in P.S Badaber. On receipt of murasila brought by constable Shah Hussain No. 383 sent by Sattar Khan SI from LRH Peshawar, which I correctly incorporated its contents into FIR Ex-PA. Today, I have seen said FIR which correctly bears my signature."

PW-6, statement of Ibad Wazir Inspector, Incharge

Narcotics Eradication Team, Peshawar on oath:-

"Stated that during those days I was posted as SHO of PS Badaber. After completion of investigation by the IO I submitted complete challan w/s 512 Cr.PC against the accused, the challan form is Ex-PK which correctly bears my signature."

PW-7, statement of Muhammad Shahid s/o

Muhammad Ashraf r/o Balo Khel, Peshawar on oath:-

"Stated that deceased Fareed Ullah was my brother. Deceased Malang alias Waqar was out neighbor. PW Hidayat Ullah is my first cousin. Accused facing trial Abid Ullah, Majid and absconding accused Zakir Hussain are brothers inter-se. On the days of occurrence, I along with PW Hidayat Ullah were coming towards our house whereas my deceased brother Fareed Ullah coming towards our house whereas my deceased brother Fareed Ullah along with deceased Malang alias Waqar were also coming towards the house but they were ahead of us after purchasing commodities because during the days of occurrence, it was the month of Ramadan. When we reached to the spot, all of sudden accused Abid, Zakir Hussain and Majid while armed with deadly weapons came and started firing at my deceased brother and deceased Malang and at us too. As a result of the firing of the accused, my deceased brother Fareed Ullah and deceased Malang alias Waqar sustained injuries and fell down on the ground whereas the accused decamped from the spot. We after arranging the vehicle, shifted the deceased then injured to the hospital but in the way to the hospital they succumbed to the injuries and died. Motive behind the occurrence was that some grappling/altercation had taken place prior to the present occurrence. The occurrence was also witnessed by PW Hidayat Ullah. On arrival to the hospital, the doctor declared the deceased then injured as dead. Thereafter, on the arrival of the police I lodged the report to the police in the shape of murasila, the same was read over to me and after

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admitting the same to be correct. I signed the same as a token of its correctness. PW Hidayat Ullah also endorsed the report as verifier. Later on, at my instance, as well as the instance of eyewitness Hidayat Ullah, the site plan was prepared by the I.O. I charge the accused facing trial along with absconding co-accused for the commission of offence."

(Signature)

PW-8, statement of Hidayat Ullah s/o Abdullah Khan

r/o Balo Khel, Peshawar on oath:-

"Stated that deceased Fareed Ullah and complainant Muhammad Shahid are my first cousins. Deceased Malang alias Waqar was our neighbor.

On the day of occurrence, I alongwith PW Shahid were coming towards our house whereas my deceased cousin Fareed Ullah alongwith deceased Malang alias Waqar were also coming towards the house but they were ahead of us after purchasing commodities because during the days of occurrence it was the month of Ramazan. When we reached to the spot, all of sudden accused Abid, Zakir Hussain and Majid while armed with deadly weapons came out from their house and started firing at deceased Fareed Ullah and Malang. As a result of the firing of the accused, my deceased cousin Fareed Ullah and deceased Malang alias Waqar sustained injuries and fell down on the ground whereas the accused decamped from the spot. We after arranging the vehicle, shifted the deceased then injured to the hospital where the doctor declared them as dead. Motive behind the occurrence was that some grappling /altercation had taken place prior to the present occurrence. The occurrence was also witnessed by my self and the complainant. Thereafter, on the arrival of the police complainant lodged the report in the hospital. Later on at our the instance, the site plan was prepared by the I.O. My statement w/s 161 Cr.PC was also recorded. I charge the accused facing trial along with absconding co-accused for the commission of offence."

A. T. T. (Signature)

Syed Arif Shah
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(Signature)

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PW-9, statement of Dr. Muhammad Arshad Hussain,

Medical Officer, KMC, Peshawar on oath:-

"I was directed by this court to produce the PW Dr. Sahibdad who had conducted the post mortem examination of the deceased in the instant case. The said PW Dr. Sahibdad has passed away. I am well conversant with the handwriting and signature of Dr. Sahibdad as he was my colleague in Forensic Medicine department

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KMC. Today, I have seen the post mortem reports of deceased namely Farid Ullah and Malang Alias Waqar, which are Ex.PM & Ex.PM/1 respectively. Both the reports are in his handwriting and correctly bear his signatures."

PW-9, statement of Jehangir Khan ASI, Incharge Bara Qadeem PP P.S Sarband, Peshawar on oath:-

"Stated that during the days of occurrence, I was posted as MI at P.S Badaber. I am marginal witness to the recovery memo Ex.PW9/1 vide which the I.O took into possession bloodstained garments of deceased Fareed Ullah consisting of Qamees shalwar Banyan, waist white in color and sealed the same into parcel No.3. the I.o also took into possession the bloodstained garments of deceased Malang alias Waqar consisting of Qamees Shalwar mehendi color and one jacket white in color and sealed the same into parcel No.4 brought by constable Zar Ali Khan No.426 from KMC sent by Doctor by affixing 3/3 seals with monogram of SH on all the parcel, he also put 1/1 monogram inside the parcel. In this respect the I.O recorded our statements u/s 161 Cr.PC."

PW-10, statement of Sattar Khan SI, P.S Sarband,

Peshawar on oath:-

"Stated that during the days of occurrence I was posted at PS Badabher. On 21/03/2019, I arrested the accused Abid Ullah and Majid Ullah and issued their card of arrest which are Ex.PW100/1 and Ex.PW10/2 respectively. Today, I have seen the aforesaid documents which are correct and correctly bears my signature."

PW-11, statement of Liaqat Ali retired SI r/o Sher

Ghar, Mardan on oath:-

"Stated that during the days of occurrence I was posted as SI at PS Badaber, Peshawar. After registration of the case, Copy of FIR was handed over to me for investigation. I proceeded to the spot and prepared the site plan Ex.PB at the instance of complainant and eye witnesses. I recorded the statements of the PWs u/s 161 Cr.PC. During spot inspection, I vide recovery memo Ex.PW11/1 recovered and took into possession blood through cotton from the place of deceased Farid Ullah and sealed the same into parcel No.1 Ex.P-1 and also recovered and took into possession blood through cotton from the place of deceased Malang alias Waqar and sealed the same into parcel No.2 Ex.P-2 by affixing 3/3

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AD&SI
P.S. Sarband, Peshawar

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PW-07 & PW-08 that house of the accused is adjacent to the place of occurrence but astonishingly the interrogation of the I.O is mum in this respect and neither house of the complainant party nor house of the accused is shown in the site plan, then question arises that how the site plan was prepared at the instance of the complainant who failed to point out houses of the accused party to the I.O from where the accused came out and started firing. The complainant and PW-08 stated that they shifted the deceased to the hospital in a vehicle of one Rahat s/o Israf Gul. They also admitted that both the deceased were shifted in one and the same vehicle, hence, question arises that when there were two seriously injured, one driver and complainant along with eye witness, then how five persons including two seriously injured were traveling in a single vehicle, such story does not inspire confidence to a prudent mind.

13. As per story narrated, if both deceased were shifted to the hospital by the complainant and eye witness in a single vehicle, their hands and cloths must would have smeared with blood of the deceased and this fact has been admitted by the complainant in his cross examination but neither blood stained cloths of the complainant nor of the eye witness were taken into possession by the I.O to substantiate that they were present on the spot.

14. Another important aspect of the instant case is that as per murasila Ex-PA/1 and FIR Ex-PA the time of occurrence is 06:50 PM, and the time of report at hospital is 08:40 PM but on the other hand, as per inquest report and PM examination, the deceased brought to hospital in dead condition on 05:50 PM, so the time of occurrence, time of report and inquest report followed by PM examination are showing contradictory times because the time mentioned in the inquest report and PM is about one hours prior to that of occurrence shown in the FIR. Besides the above, the complainant stated that after about 20-30 minutes of reaching hospital, he lodged the

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report, then the report should have been lodged on 06:30 PM whereas, as per record it was lodged on 08:40 PM and about 02 hours delay in the FIR is also unexplained.

15. Regarding presence of the eye witness Hidayat Ullah the CDR data was collected and placed on record by the I.O but it is on the record that the occurrence took place at Balo Khel Payan while the presence is in Balo Khel Bala which both are two different and separate places of the village, however, another question arises here that, if the I.O placed on record CDR data of the eye witness to show him present on the spot, then why the CDR data of the complainant was not placed on the record to show him presence on the spot, therefore, if from the CDR data of the eye witness, his presence on the spot could be believed, then by not placing on record CDR data of the complainant, his presence on the spot could safely be disbelieved.

16. From what has been discussed above, the presence of PWs and report regarding ocular account is much doubtful and cannot be safely relied upon.

CORROBORATIVE PIECE OF EVIDENCE:-

17. The object and purpose of corroborative piece of evidence is to further corroborate and strengthen the allegation regarding the ocular account of the occurrence or in absence of any ocular account, if the case is based on circumstantial evidence then material on the record has to corroborate such circumstantial evidence. The instant case is based on ocular account of the occurrence, while the fate of ocular account has already been discussed in detail. It has already been discussed in detail while discussing ocular account of the case that the site plan of the instant case is totally in negation of the ocular account as alleged by the complainant in his initial report Ex-PA/1 followed by Ex-PA, hence, there is no need for repetition of the discussion already made.

18. The record is very much clear to the effect

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that the investigation officer visited to the spot on the date of occurrence and prepared the site plan but a single empty shell was not recovered from the spot and similarly, a single spent bullet was also not recovered from the spot inspite of the fact that as per statement of the complainant as PW-07 and eye witness PW-08 almost 30/35 rounds were fired by the accused party. Similarly, during the course of spot inspection, the I.O has not mentioned any signs of fire-shots on the surrounding walls despite of the fact that according to the site plan Ex-PB, the place of occurrence is thoroughfare (street) and congested surrounded by houses.

19. Besides the above, three (03) accused were charged for indiscriminate firing upon the complainant party as well as both the deceased but on the other hand, in the post mortem report of both the deceased Ex-PM/1, the dimension of all the entry wounds on the person of both the deceased have been shown measuring 0.5 × 0.5 size, hence, the post mortem reports suggest that all the injuries sustained by the deceased were the result of fire shots from one and the same weapon. Therefore, the post mortem reports do not corroborate the version of the prosecution story.

20. The complainant in his initial report Ex-PA/1 stated the motive behind the occurrence to be some altercation and quarrel with the accused party which motive was also reiterated by the complainant (PW-07) however in the cross examination, the said complainant stated that in-fact the accused facing trial Abid used to take "Kalang/Bhatta" from the locals and further stated that they had reported the matter in this respect to the local police but astonishingly, the whole of the prosecution file is totally silent, so the complainant is himself confused pertaining to the motive recorded by him in his initial report and during the course of his statement as PW-07.

21. At the time of arrest of both the accused facing trial from their home, allegedly one Kalashnikov from the



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possession of the accused Abid Ullah and one 30 bore pistol was recovered from the possession of the accused facing trial Majid Ullah and in this respect, a separate FIR No. 194/2019 u/s 15-AA/5 Explosive Substance Act of P.S Badaber, Peshawar was also registered however, there is no matching reports of the weapons with the empties because it has already been discussed in detail that during the course of spot inspection, neither any empty shells were recovered nor any spent bullet was recovered. Similarly, during the course of investigation as well as during the course of statements of the PWs, there is nothing cogent or trustworthy to the effect that the alleged recovered weapons were used in the commission of the offence.

22. Last but not least is that the prosecution case, during the course of investigation as well as during the course of statements of the PWs is full of major contradictions and material discrepancies and the prosecution failed to substantiate the allegation against the accused facing trial beyond shadow of doubt.

23. Therefore, keeping in view the state of affairs discussed above, the accused facing trial namely *Abid Ullah and Majid Ullah both sons of Nasrullah R/o Balo Khel, Badaber, Peshawar* are hereby acquitted of the charges leveled against them vide FIR No. 540, dated 27-06-2015 u/s 302/34 PPC of P.S Badaber, Peshawar by extending them benefit of doubt. They are in custody, be released forthwith, if not required to be detained in jail in any other case and in this respect, release warrant to the Jail Authorities be issued, forthwith.

24. The co-accused namely *Zakir Hussain s/o Nasrullah R/o Balo Khel, Badaber, Peshawar* is absconding, hence, a prima facie case exists against him; as such, he is declared as Proclaimed Offender and perpetual warrants of arrest be issued against him. His name be entered in the list of P.Os.

25. The case property, be kept intact till period of

Syed Arif Shah
 ADJ. S. VII, Peshawar

ATTESTED

08 APR 2024

(Examiner)

Session Court Peshawar

Attended

18

appeal/revision and thereafter, be disposed off in accordance with law and rules. (85)

26. Requisitioned record be returned along with copy of this Judgment to the quarter concerned, whereas, record of this court be consigned to record room after necessary completion and compilation.

27. *Pronounced in an open court at Peshawar and given under my hand and the seal of the court on this 2nd day of May, 2023.*

Announced:
02-05-2023

(Signature)
Syed Arif Shah
AD & SJ-VII, Peshawar
Syed Arif Shah
AD&SJ-VII, Peshawar

CERTIFICATE:

Certified that this Judgment including certificate consists of Nineteen-(19)-pages, each page has been read, corrected wherever, it was necessary and signed by me.

(Signature)
Syed Arif Shah
AD & SJ-VII, Peshawar

Syed Arif Shah
AD&SJ-VII, Peshawar

No.	20835
Date of Application	04-04-24
Name of Applicant	محمد علی خان
Word, Page	16
Fee	
Signature of Typist & Date	08-04-24
Signature of Preparation	08-04-24

ATTESTED

08 APR 2024
(Signature)
Session Court Peshawar


Attended

19A

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Shipment Information	Client Information	Price Information
Tracking #: PW595204188 	To : CCP Address: CAPITAL CITY POLICE OFFICER PESHAWAR Contact : 03111111111 /	Pieces : 1 Charged Wgt : 0.25 (KG) Dimension : N/A x N/A x N/A Val. Declared : 250.00 Rs Insurance : 0% 0.00 Rs Rate : 280.00 / Rs MTD Amount : 0.00 Rs VAS : 20.00 Rs Trade Discount : 0.00 Rs *10% Fuel Impact Included Net Amount : 261.00 Rs Sales Tax : 15% 39.00 Rs Payable Amount: 300.00 Rs Description : ON SHIPPER RISK DOC - Codes : 0TH.
MTD : () User : WARSAK.PW Booking Date/Time : 25 Apr 2024 14:47:04 Origin : PESHAWAR Destination : PESHAWAR NTN NO : 2824502-4 Sales Tax Reg No: N2824502-4	From : CONS MAJID ULLAH Address: POLICE STATION PHAR PURA PESHAWAR Contact : 03101171737 / NTN : CNIC : 1730115381473	

You can receive delivery status on your mobile by sending SMS as Track [Consignment#] to 8061. www.leopardscourier.com

Attended
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To,

The Capital City Police Officer,
Peshawar.

Subject:

APPLICATION FOR ISSUANCE OF INQUIRY
REPORTS / FINDINGS OF INQUIRY
ALONGWITH CHARGE SHEET TO THE
APPLICANT

Respectfully Sheweth:

That the applicant submits as under:-

1. That the applicant is the regular employee of KPK Police Force.
2. That the applicant was performing his duty with full devotion and loyalty.
3. That in the year 2015 a false FIR was lodged against the applicant.
4. That the applicant was arrested by the local police and was sent to jail meanwhile inquiry was conducted & was charge sheeted & resultantly, the applicant was dismissed from service.
5. That applicant was trialed by ADJ Peshawar and he was acquitted from the charge on 02.05.2023.
6. That after acquittal the applicant approached to the competent authority through proper appeal for reinstatement in the service.

4/11/23
Agd

24

7. That the appeal of the applicant was partially accepted and was re-instated in service but the period remained out of service was counted as without pay.
8. That aggrieved from the order dated: 02.05.2023 applicant again filed an appeal for grant of back benefits, but the appeal was turned down.
9. That the applicant approached to KPK Service Tribunal for back benefit where the applicant was directed to produce the charge sheet alongwith inquiry report, hence the instant application. **(Copy of order sheet is attached)**

Therefore, it is humbly requested to provide the attested copy of the inquiry report alongwith charge sheet to the applicant.

Thanks

Dated: 19.04.2024

Your's Sincerely

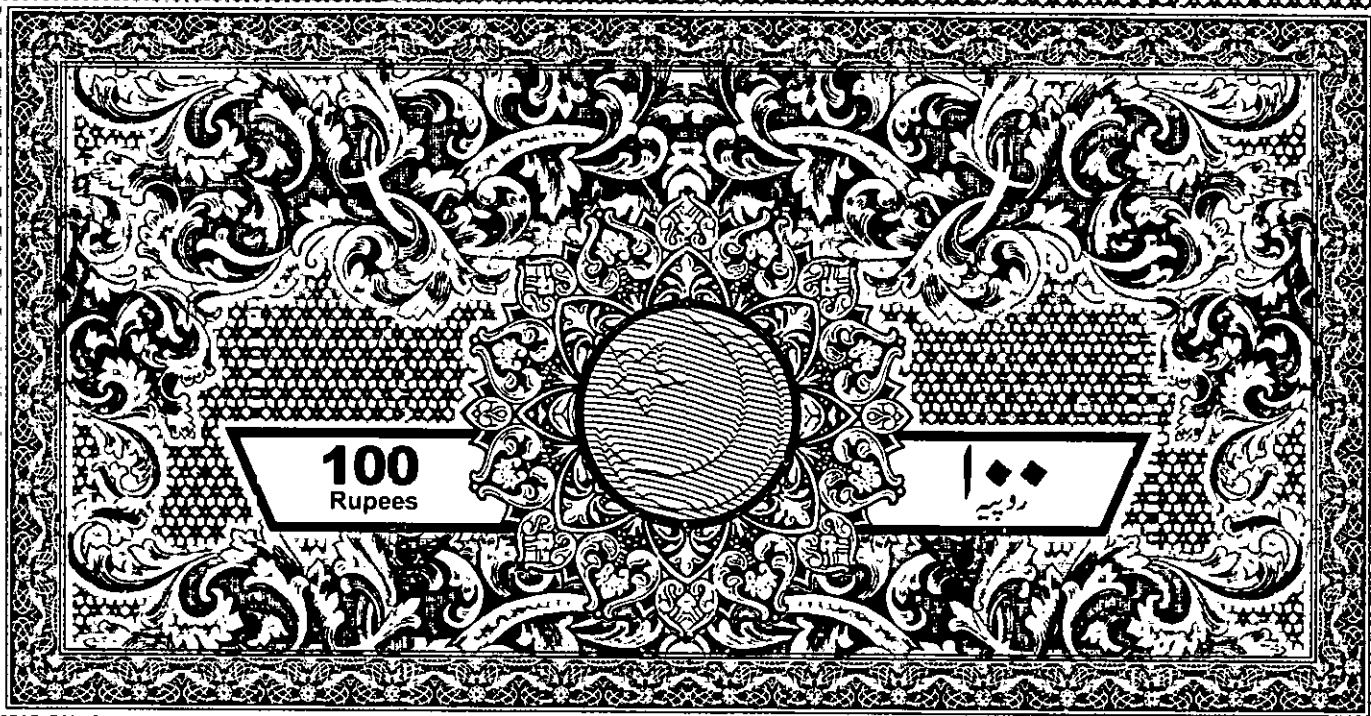

Majid Ullah (Constable)

PS: Pahari Pura Peshawar

CNIC No: 17301-1538147-3

CELL No: 0310-1171737

Attested
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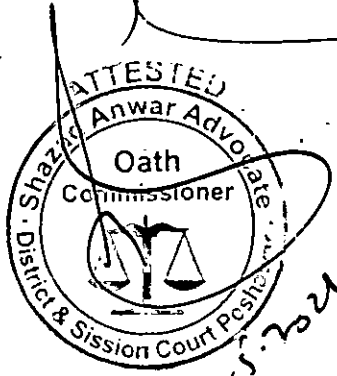


بیان حلفی

۲۲

من قسمتی خاجد اللہ فلہ لقرآناً حلفاً بیانی ہوں کہ در دوران ضروری من قومی
نے پاکستان میں یا کسی دوسری کوئی بھی سرکاری یا گورنمنٹ آفس میں
کوئی نوکری نہیں کی۔ اور نہ ہی کسی دوسری قسم کا نفع یا نقصان
کا دربار میں شہا ہے۔

دوران ضروری میرا سارا خرچہ گزر اوقات کے لیے والد
پر دہشت کرتے رہے۔
کہہ میں بد دوران زیادہ ضروری زیادہ تر بیمار اور گریج
رہا۔ بیماری کے کاغذات منسلک ہیں۔



02-05-2024

خاجد اللہ فلہ لقرآناً

Attested

محکمہ اعلیٰ و نچرل سرائے برائے بیجان صلی

8/5/2024

District Controller of Accounts
10 NOV 2023
(Treasury Wing) Peshawar

M. FAZAN ANWAR SO M. ANWAR KHAN
Stamp Vendor
Licence No. 434DC(P)HC
Issue D. 2023

PN

No. _____ Rs. 5-
 OUT-PATIENTS DEPARTMENT.
 NAME... M. H. L.
 YEARLY NO... 53538
 DATE... 24-9-2011
 DISEASE Depression/Anxiety

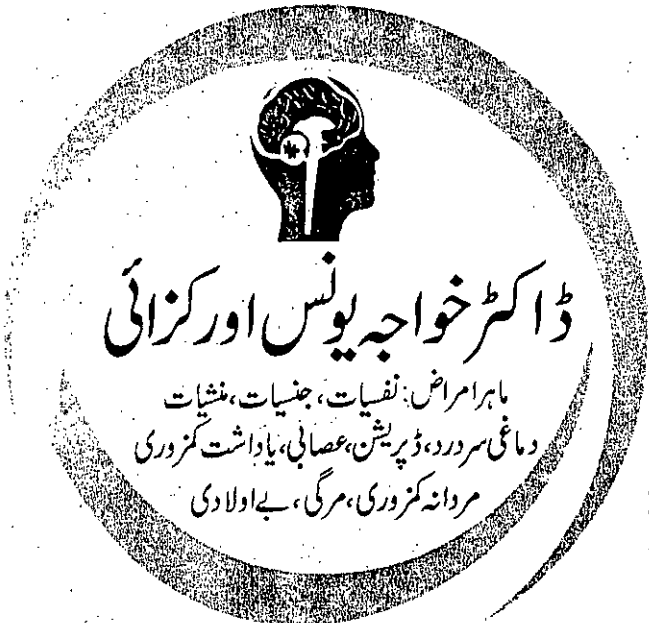
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Psychiatrist / Psychotherapist

Dr. Khwaja Younas Orakzai

M.B.B.S, M.C.P.S (PSY)
 DCP PSYCH (IRELAND)
 Mood Disorder (USA)
 MPH (Pak)
 PMDC-Reg No 3791-B
 KPK Commission Reg-No.00230
 Ex. Govt. Lady Reading Hospital Peshawar.
 Ex. Head Psychiatry Unit DHQ Charsada
 Ex. Head Psychiatry Unit Sarhad Hospital Peshawar
 Incharge Psychiatry Unit (Central Prison) Hospital Peshawar.

HOSPITAL (DKY) & REHABILITATION CENTER

Room: C-10 3rd Floor Khushal Medical Center Dabgari Garden Peshawar.

Ph: 0331-9049848

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Majid Ali

Date: 23/11/23

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Attested. [Signature]

28

Shafique Psychiatric Clinic
Psychotherapy Clinic
Inpatient Ward

Shafique Psychiatric Clinic

Jamrud Road, Tehkal Bala
Peshawar 25140
Pakistan.

13 OCT 2018

NAME: _____

DATE: _____

PROF. DR. M SHAFIQUE
M.B.B.S (Pb); D.P.M.(Eng)
F.R.C.Psych (UK)

DR. JAMAL ARA
M.B.B.S (Pb)

DR. MUHAMMAD TARIQ
M.B.B.S (KMC Pesh)
M.D. (Psych)

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Diplomate American Board
of Psychiatry and Neurology
Fellow: Psychoanalytic Psychotherapy
Harvard, Boston, USA

پروفیسر ڈاکٹر محمد شفیق
ڈی. پی. ایس. (پشاور) (لندن)
ایف. آر. سی. (انگلینڈ) (سائیک)

ڈاکٹر جمال آرا
ایم. بی. بی. ایس. (پنجاب)

ڈاکٹر محمد طارق
ایم. بی. بی. ایس. (پشاور)
ایم. بی. بی. ایس. (سائیک)

ڈاکٹر فواد خان
ایم. بی. بی. ایس. (پشاور)

ڈیپلوم ایٹ امریکن بورڈ آف سائیکیاٹری اینڈ نیورالوجی
فیلو آف سائیکو ایٹریٹری ہارورڈ یونیورسٹی، (امریکہ)

MEDICAL SPECIALIST
& PSYCHIATRIST

DR. SADIA SHAFIQUE
M.B.B.S.(KMC-Pesh)
M.R.C.P. (UK)
M.C.P.S. (Psych)

ڈاکٹر سعید شفیق
ایم. بی. بی. ایس. (پشاور)
ایم. بی. بی. ایس. (انگلینڈ)
ایم. بی. بی. ایس. (سائیک)

ڈاکٹر محمد ریاض شعیب
M.B.B.S (PK)
D.C. Psych RCPS (Ireland)
Dip Psychoanalysis (UK)

Tel: (091) 5840423
(091) 5703115

0333-9139266
0303-8786865

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ADP

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Shafique Psychiatric Clinic

Jamrud Road, Tehkal Bala
Peshawar 25140
Pakistan

30

PROF. DR. M. SHAFIQUE
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ایف۔ آر۔ سی۔ سائیک (انڈیا)

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ایم۔ سی۔ ایم (پنجاب)

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فلوریڈا ایس سائیکیاٹری ہارورڈ یونیورسٹی (امریکہ)



DR. SADIA SHAFIQUE HUSSAIN
M.B.B.S. (KMC Pesh)
M.R.C.P. (UK)

ڈاکٹر سادیہ شفیق حسین
ایم۔ پی۔ ایم (پنجاب)
ایم۔ سی۔ ایم (پنجاب)

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Web: www.spcpk.com
Email: info@spcpk.com

Email پر معلومات کیجئے۔ اس میں آپ کو بہت سہولت
ہوگی۔ خبر گیری ایسا سہولت ہے اور کوئی چھوٹا مشورہ بھی

NAME: Majid Ullah Khan

Rx
Triluoperazine (Estezene, Stelazine) 5mg
گولی رات 1 + گولی صبح 1

Kemadrin
گولی رات 1 + گولی دوپہر 1 + گولی صبح 1

Olanzapine 5mg (Olanzia /Zyprexa)
گولی رات 1/2
ایک کپسول کو کھول کے اس کے پاؤڈر کو ایک گلاس شربت، پانی یا دودھ
میں اچھی طرح حل کر لیں۔ پھر آدھا گلاس پی لیں۔ باقی آدھا گلاس آگے
رات کو پی لیں۔ اگر صبح سے بچا کر کھیں تو دو لٹری شربت لیں۔

Mirtazapine (Remeron, Mipine) 30mg
گولی رات 10 ڈین
گولی رات 1 پھر

Signature

دوبارہ معائنہ
OLG
دوبارہ معائنہ کے بعد
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Atted.
guy



Shafique Psychiatric Clinic
 Psychotherapy Clinic
 Inpatient Ward

Shafique Psychiatric Hospital

Jamrud Road, Ichkal Bala
 Peshawar 25140
 Pakistan.

NAME: _____

DATE: _____

PROF. DR. M SHAFIQUE
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 ایف۔ آر۔ سی۔ مائیک۔ (انگلینڈ)

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 ایم۔ سی۔ پی۔ ایس۔ (مائیک)

ڈاکٹر فواد خان
 ایم۔ بی۔ ایف۔ ایس۔ ایم۔ ڈی.

ڈیپلومیٹ امریکن بورڈ آف سائیکیاٹری اینڈ نیورالوجی
 فیلو آف ایسوسی ایٹس آف امریکن ایسوسی ایشن آف سائیکیاٹریسٹس (ایریکا)



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 M.R.C.P. (UK)
 M.C.P.S. (Psych)

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 ایم۔ سی۔ پی۔ ایس۔ (انگلینڈ)
 ایم۔ سی۔ پی۔ ایس۔ (مائیک)

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 Fax: (091) 5244722



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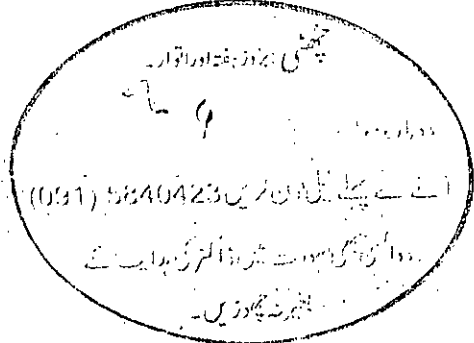
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Shafique Psychiatric Clinic
Psychotherapy Clinic
Inpatient Ward

Shafique Psychiatric Clinic

Jamrud Road, Tehkal Bala
Peshawar 25140
Pakistan.

18 SEP 2010

NAME: _____

DATE: _____

PROF. DR. M SHAFIQUE
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ڈاکٹر جمال آرا
ایم۔ بی۔ ایس۔ (پنجاب)

ڈاکٹر محمد طارق
ایم۔ بی۔ ایس۔ (پاکستان)
ایم۔ بی۔ ایس۔ (انگلینڈ)

ڈاکٹر فواد خان
ایم۔ بی۔ ایس۔ (انڈیا)

ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس، ایڈیٹور سائنس

MEDICAL SPECIALIST
& PSYCHIATRIST

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M.R.C.P. (UK)
M.C.P.S. (Psych)

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Fax: (091) 5242722

Web: www.shafique.org
E-mail: info@shafique.org

R

Tab Vaprodene 3mg
1 + 1

Tab Kemadren 5
1 + 1

Stazina/depka
10 10
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Insulin 40
1/2 + 1/2

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