

FORM OF ORDER SHEET

Court of _____

Appeal No.

1033/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	24/07/2024	<p>The appeal of Mr. Javed Muhammad resubmitted today by Mr. Ashraf Ali Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 26.07.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Javed Muhammad received today i.e on 19.07.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

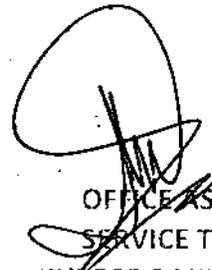
1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.

② Annexures-B and C of the appeal are incomplete be completed.

3- Copy of impugned order dated 18.10.2023 mentioned in the heading of the appeal is not in field.

No. 417 /Inst./2024/KPST,

Dt. 22/7 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ashraf Ali Khattak Adv.
Supreme Court at Peshawar.

All the instant objection has been removed and kindly may resubmitte again.

Dated 23/07/2024

U1
23/7/24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1033 /2024

Javid Muhammad
Sub-Inspector,
Police Force, Kohat.....Appellant.

Versus

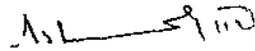
The Regional Police Officer,
Kohat Region, Kohat & others.....Respondents.

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Appellant

Through


Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

Dated: 107 /2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1033/2024

Javid Muhammad
Sub-Inspector,
Police Force, Kohat.....**Appellant.**

Versus

1. The Regional Police Officer,
Kohat Region.
2. The District Police Officer,
District Kohat.....**Respondents.**

**SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED ORDER DATED
08-03-2024 PASSED BY RESPONDENT NO.2**

Respectfully Sheweth,

The facts given rise to the present service appeal are as under;

1. That appellant was posted as SHO PS: Shakardara on 31-03-2023 where he performed his services till 04-07-2023 with clean sheeted conduct record and with entire satisfaction of his superiors.
2. That there is Oil Fields of OGDCL in the vicinity of PS: Shakardara where FC staff including security guards has been appointed under the supervision of a retired colonel Officer of Army to look after the security of the Oil Filed and Gas Pipelines.

3. That no complaint / FIR was lodged by FC staff and security guards regarding stolen / sale or purchase of Gas Pipelines before and during the posting of the appellant.
4. That appellant registered numerous FIRs and arrested many accused involved in theft / stealing of Gas Pipelines. Copies of FIRs are attached as **Annexure-A.**
5. That OGDCL Company provided a Pickup Car along with a Driver namely Mr. Imtiaz to Police Station Shakardara in the year 2021. An FIR U/S 302 was lodged against said Driver (Imtiaz) and he remained absconder but later on, he was arrested and remained behind the bar for 7 months. The Driver was then released on Bail.
6. That owner of the pickup Car (Uncle of Driver Imtiaz) namely Mr. Malik Rasheed again requested to appoint Mr. Imtiaz as Driver of the Pickup. As per instructions of high-ups, appellant was not authorized by his superior officer to appoint him as Driver and asked the owner to arrange another Driver but he insisted to appoint his nephew (Imtiaz) as Driver and lastly the owner ended his Agreement with OGDCL and returned the Pickup Car. Copy of Report regarding return of the Car is attached as **Annexure-B.**
7. That stubbornly the owner of the Pickup Car started campaign against appellant on Social Media through different fake IDs/Profiles. Appellant highlighted the issue before his superior's thereafter respondent No. 2 submitted a complaint to FIA against the owner. Furthermore, Rs.70 Lacs were looted from a Post Master by unknown accused. The owner again started to defame the appellant on social media by false allegation of theft / stealing of the looted amount. Later on, the culprits were arrested, amount was recovered and another complaint was also lodged to FIA by respondent No.2 against the owner of the Pickup Car.
Copies of complaints are attached as **Annexure-C.**

8. That other nephews and relatives of the owner who are addicts of intoxication and they were arrested in FIRs under sections 15-AA, 9-D, 302 & 324. Copies of FIRs are attached as **Annexure-D**.
9. That in retribution, the said owner of the Pickup Car Mr. Malik Rasheed lodged complaints against the appellant by false allegation of involving in stealing / theft of the Gas Pipelines. A Show Cause Notice was served to the appellant which was replied by the appellant.
Copies of Final Show Cause Notice and reply of the appellant are attached as **Annexure-E**.
10. That a slipshod inquiry was conducted in the absence and at the back of appellant and appellant was awarded major punishment of reduction from substantive rank of offg: Sub Inspector to Assistant Sub Inspector vide Order dated 18-10-2023.
Copy of Impugned order dated 18-10-2023 is attached as **Annexure-F**.
11. That being aggrieved from the aforementioned order, appellant preferred a Departmental Appeal on 07-11-2023 which was disposed of by the appellate authority (respondent No.1) in the following words.

“From the perusal of the record, it has transpired that appellant was promoted as officiating sub inspector on 01-01-2024, he has not yet been confirmed as Sub Inspector. Consequently, he is holding the substantive rank of Assistant Sub Inspector. Section 4 (2) (b) of the Khyber Pakhtunkhwa Police Rules, 1975 (as amended in 2014) provides that reversion from an officiating rank is not a punishment. Thus the appellant is currently holding the substantive rank of Assistant Sub Inspector”

Forgoing in view, I Sher Akbar, PSP, S.St, regional Police Officer, Kohat being the appellate authority hereby set aside the punishment of reduction from the rank of officiating Sub

Inspector to Assistant Sub Inspector awarded by DPO, Kohat vide order No.877 dated 18-10-2023. The departmental inquiry conducted against the appellant, stands pending before the DPO, Kohat. He is, therefore, directed to pass a speaking order on the departmental inquiry conducted against the appellant strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 (as amended in 2014) within a period of 15 days after the receipt of the order of this office.

Copies of Departmental Appeal and order No.174/EC, dated 04-01-2024 are attached as **Annexure-G & H**.

12. That the District Police Officer (respondent No.2) in pursuance of the appellate order of RPO, Kohat Region (respondent No.1) dated 04-01-2024, awarded the appellant major punishment of reduction in pay to initial stage in the same time scale for the period of 02 years with immediate effect vide order OB No.209 Endst. No.1877-79/PA dated 08-03-2024.

Copy of order OB No.209 Endst. No.1877-79/PA dated 08-03-2024 is attached as **Annexure-I**.

13. That being aggrieved from the fresh impugned order dated 08-03-2024, appellant again moved departmental appeal before respondent No.1 vide Diary No.1659 dated 05-04-2024 (**Annexure-J**) which is still pending without disposal hence, the statutory period has been elapsed therefore, the instant service appeal on the following amongst other grounds.

G R O U N D S

- A. That the respondents have not treated the appellant in accordance with law, rules and policy and acted in violation of Articles 4, 10-A, 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973. Appellant has been penalized as a result of counter blow organized by anti-state Gas Pipeline thieves; who malafidely and with ulterior motives in order to pressurize and to restrain the appellant from his legal obligations entrusted upon him by the law. The record reveals that appellant

has incorporated number of FIRs against the complainants and complainant parties which is evident not only from the contents of the FIR but also from the photographs annexed with this appeal. The record further reveals that there is / was a continuous campaign made by the complainant through social media. The record also reveals that respondent No.2 brought the continuous harassment of the appellant into the notice of FIA authorities for initiating lawful process against the complainant and his companions. All this documentary evidence coupled with circumstantial evidence, safely proves the malafide intention of the complainant in view of the tangible and solid evidence, the impugned penal orders are nothing more than the harassment of the appellant therefore, the impugned orders are liable to be set aside.

- B. That Section 16 of the Civil Servants Act, 1973 provides that every civil servant is liable to be proceeded against departmentally in accordance with the laid down procedure provided for in the statute and statutory rules. The competent authority as well as the inquiry officer failed to adopt mandatory required procedure. The defense of the appellant vides its reply to the charge sheet and statement of allegations has been discarded without any legal and factual support. The very charge sheet is flimsy in nature as it does not provide specific allegations. Neither it provides the day, date, and specific time of the alleged accusation of facilitating the Gas Pipeline thieves nor does it provide detail of persons, to whom appellant has extended unlawful facilitation. The charge sheet also does not provide the manner in which the alleged facilitation has been made on the part of the appellant. The charge sheet is nothing more than a general allegation which has occasioned cause of injustice and the appellant has been deprived from his right of defense therefore, the charge sheet is nullity in the eyes of law and is liable to be declared as illegal, unlawful and also liable to be discarded.
- C. That no evidence whatsoever, has been collected by the inquiry officer. The whole proceedings of the inquiry have been conducted in the absence and at the back of the appellant. In case, there is / was any statement; appellant is not aware of the same and also not been confronted with such evidence. The question of cross examination cannot be raised.
- D. That competent authority without considering the available record on merit, have failed to determine as to whether the charge leveled against the appellant has been

proved or otherwise and also as to whether the prescribed mandatory provisions provided for in the statute and statutory rules have been adopted or not. The competent authority also failed to attach inquiry report with the final show cause notice which is mandatory as per law laid down by this Hon`ble Tribunal as well as by the Hon`ble Supreme Court of Pakistan. On this score as well, the impugned order is nullity in the eyes of law and is liable to be set aside.

- E. That the alleged charge sheet and statement of allegations has never been served upon the appellant and appellant has acquired the same through his own efforts. The bare perusal of the charge sheet and statement of allegations shows that it does not provide the true spirit of accusation and specification of the role of the appellant in the alleged occurrence which has caused serious injustice to the service career of the appellant comprising of for almost 26 years. The long standing service career of the appellant has been reined with single struck of pen.
- F. That the impugned order has been passed in violation of the law laid down by the Hon`ble Supreme Court of Pakistan which provides that in case of major penalty and factual controversy, regular inquiry was obligatory and in absence of regular inquiry penal order of major penalty (dismissal from service) cannot be clothed with validity and was liable to be struck down on this score alone.

Citation Name : 2019 PLC(CS) 224 PESHAWAR-HIGH-COURT

Side Appellant : SALEEM WAZIR PROFESSOR COMMUNITY MEDICINE

Side Opponent : GOVERNMENT OF KHYBER PAKHTUNKHWA

Major penalty, imposition of---Requirements---Any disciplinary proceedings relating to misconduct of an employee/officer of any department which entails major penalty of removal/dismissal from service must be inquired through **regular inquiry** which cannot be dispensed with in matter where controversial facts and ticklish questions are involved.

Citation Name : 2019 PLC(CS) 475 KARACHI-HIGH-COURT-SINDH

Side Appellant : IQBAL HUSSAIN

Side Opponent : FEDERATION OF PAKISTAN through Secretary Ministry of Information and Technology, Government of Pakistan

Holding of **regular inquiry** in case of imposition of major penalty was prerequisite and mandatory condition.

- G. That the basic concept of regular inquiry was the formation of issues, its determination and reason for determination along with recommendations but the same are absolutely missing as evident from the context of the impugned order, which is against the provision of General Clauses Act, 1897.
- H. There can be no cavil with proposition that act of carelessness on the part of civil servant could be a valid ground to award penalty. Elements of bad faith and willfulness may bring the act of negligence within the mischief of "misconduct" within the meaning of section 4 but a conduct demonstrating lack of proper care and the requisite vigilance may not always be willfulness amounting to grave negligence to warrant harsh punishment under S. 4. 2013 TD (Service) 204, 2013 SCMR 817.
- I. That the well-known principle of law " Audi altram Partem" has been violated. This principle of law was always deemed to have embedded in every statute even though there was no express specific or express provision in this regard.

....An adverse order passed against a person without affording him an opportunity of personal hearing was to be treated as void order. Reliance is placed on 2006 PLC(CS) 1140. As no proper personal hearing has been afforded to the appellant before the issuing of the impugned order, therefore, on this ground as well the impugned order is liable to be set aside.

The Executive have to show source of authority:-

The Executive is not above law and it must, on challenge to its action, show the legal authority from where it derives the source of its authority. In case the executive fails to show the source of its power, its acts, as so far they conflict with legal protected interests of individuals, must be declared by courts Ultra vires and without jurisdiction. [PLD 1990 Kar 9].

Things must be done in prescribed manner or not at all..... Expressio unius est exclusion alterius..... When an action is required to be done in a particular manner that must be done in that manner only or not at all.

Burden of proof on the prosecution to prove the charge.

The law in the country is still unchanged and is governed by law of Qanoon-e-Shahadat in Vogue and by virtue of the same, we have to see, that it is for the prosecution to establish the guilt of the person and if it fails to do so, the result is that benefit goes to the accused of the said failure.

If the allegation against the accused civil servant/employee is of serious nature and if he denies the same, a regular inquiry cannot be dispensed with. In such a case, the initial burden on the department to prove the charge, which cannot be done without producing evidence [1983 PLC (CS) 211 + 1997 PLC (CS) 817 (S.C) + 1997 SCMR 1543].

Standard of proof.....To be akin to one required in criminal cases.

It is significant that while referring to civil servant, who is being proceeded against under the Govt: Servant (Efficiency and Discipline) Rules the word "accused" has been used which indicates that the proceedings conducted by the inquiry officer are akin to a criminal trial [1996 SCMR 127]. A person is presumed to be guilty of misconduct if evidence against him establishes his guilt. The use of the word "guilty" is indicative of the fact that the standard of proof should be akin to one required in criminal cases [PLD 1983 SC (AJ & K) 95].

Prosecution to stand on its legs to prove the allegations.

Accused is stated to be a favorite child of law and he is presumed to be innocent unless proved otherwise and the benefit of doubt always goes to the accused and not to the prosecution as it is for the prosecution to stand on its own legs by proving all allegations to the hilt against the accused. Mere conjectures and presumption, however strong, could not be made a ground for removal from service of civil servant [1999 PLC (CS) 1332 (FST)]..... Unless and until prosecution

proves accused guilty beyond any shadow of doubt, he would be considered innocent [1983 PLC (CS) 152 (FST)].

- J. That appellant would like to seek the permission of this Hon'ble Tribunal to advance more grounds at the time of hearing.

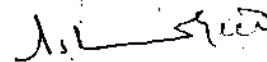
PRAYER:

On acceptance of the instant service appeal, this Hon'ble Tribunal may graciously be pleased to:-

- i. **Declare** the impugned order OB No.209 Endst. No.1877-79/PA dated 08-03-2024 as illegal, unlawful and without lawful authority and set aside the same.
- ii. **Direct** the respondents to reinstate the appellant on his original position as officiating Sub Inspector with all back benefits and other fringed benefits.
- iii. **Any other relief** as deemed appropriate under the circumstances of the case may also graciously be allowed to the appellant.

Through

Appellant



Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

&

Ali Bakht Mughal
Advocate,
High Court, Peshawar

Dated: ____ / ____ /2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2024

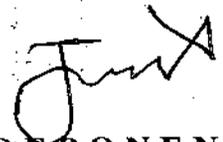
Javid Muhammad
Sub-Inspector,
Police Force, Kohat.....**Appellant.**

Versus

The Inspector General of Police,
Govt. of Khyber Pakhtunkhwa & others.....**Respondents.**

AFFIDAVIT

I, Javid Muhammad, Sub Inspector, Police Force, Kohat do hereby solemnly affirm on Oath that the contents of the instant service appeal are true and Correct to the best of my knowledge and belief and nothing has been concealed from the notice of this Hon'ble Tribunal.


DEPONENT

فارم نمبر ۷۲-۱

ANX (A) II

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۲ مجموعہ ضابطہ نو جداری

کوٹاٹ

شکر درہ

تاریخ 5⁴/₂₃ وقت 22:00 گھر 61

وقت رپورٹ 5⁴/₂₃ وقت 22:30 بج چاکسری پر 5⁴/₂₃ وقت 23:10 بج

ت اطلاع دہندہ دستخط اور اس کا کی موبائل فون نمبر

جاوید خان SHO

ت جرم (مدد دفعہ) حال اگر کچھ لیا گیا ہو۔

PPC 379

ت فاصلہ تھانہ سے اور سمت محترمہ ووڈ منڈر کمر فزڈ OGDCL کمپنی شکر درہ

ت ملزم فرصاد اللہ ولد میر اسلم سکھہ جانک حال فقرا آباد

ت تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو

میر سیدتی میر اسلم بر صید دیا جا تا ہے

ت ردا گئی کی تاریخ و وقت

میر سیدتی ڈاک

ابتدائی اطلاع شیخ درج کرو۔ اس وقت آخر میری میر اسلم عنایت جاوید خان SHO بدست قبل منگول 713 موصول ہو کر درج ذیل ہے۔ محرم عقابہ منگولہ اشب میں ہم کنسٹیبلز منگول 713، امان اللہ 1342، میر دیگر تفریق پولیس کے بوقت عقابہ بالا نام مذکور موجود تھا کہ اس دوران ایک ایک اب جانب تندرک سے آتا ہوا جب نزدیک سنیو لوڈ ایک اب ڈرو ٹیوڈ نے ایک اب جو کھنڈا لٹری کے ڈرو ٹیوڈ لٹری اب کو کھنڈا کر مہاگ نکلا۔ جس کا تعاقب کر کے ٹاؤن کی روشنی میں مہاگتے ہوئے کھنڈ کی شناخت ہو کر جو میری فرصاد اللہ ولد میر اسلم سکھہ جانک حال فقرا آباد متیاف لیا۔ جو رات کی تاریکی کا فائدہ اٹھاتے ہوئے رفو کر کے ایک اب کی پڑھال کر کے پریک اب کی باڈی میں بائیں آسن ملکیس OGDCL کمپنی ٹکڑوں کی شکل میں کل 23 عدد مختلف سائز میں موجود ہیں۔ جو OGDCL یاٹ لائن سے چوری شدہ معلوم ہوئے ہیں۔ ایک ایک نمبر ICT-TR-892 میری بائیں بائیں بروئے فری قبضہ پولیس میں کیٹی۔ ڈرو ٹیوڈ میں فرصاد اللہ ولد میر اسلم کو مہاگتے جسم بالا کا پائلر علی گھر فساد ہی و پشیش و کھنڈ میر اسلم ایک اب میری بالا میری بائیں مختلف سائز بدست منگول با اعداد ڈرو ٹیوڈ زاہد 297 اور سال تھانہ ہے۔ میں معروف کھنڈ ہوں۔ و شہزاد انگریزی جاوید خان SHO موزر 5⁴/₂₃ کارروائی تھانہ آفدہ میر اسلم حروف برف دوج بالا ہو کر بر صید۔ بزم بالا چاکسری مگر لغول FIR میر میر اسلم لبرض قبضہ عقب SHO صاحب آفدہ منگول میری دیا جا تا ہے۔ بر صید گزروش ہے۔

ATTACHED  OGDCL. 1. 97

ہے۔ چونکہ امتیاز ڈرا سٹور کی دشمنی ہے۔ اس دشمنی کی وجہ سے پولیس کو مسائل کا سامنا کر سکتا ہے۔ سرپرست ہم امتیاز ڈرا سٹور کو اپنے ساتھ نہیں رکھ سکتے ہیں۔ جملہ حالات واقعات SPPs صاحب سربل کے نوٹس میں لاکر SPPs صاحب نے بھی یہی ہدایت جاری کر رکھی کہ فوراً سٹور امتیاز کی وجہ سے آگے پولیس کو مسائل کا سامنا کر سکتا ہے۔ سرپرست ڈرا سٹور امتیاز کا آگے کیا جو موجود ہونا چھٹک نہیں ہے۔

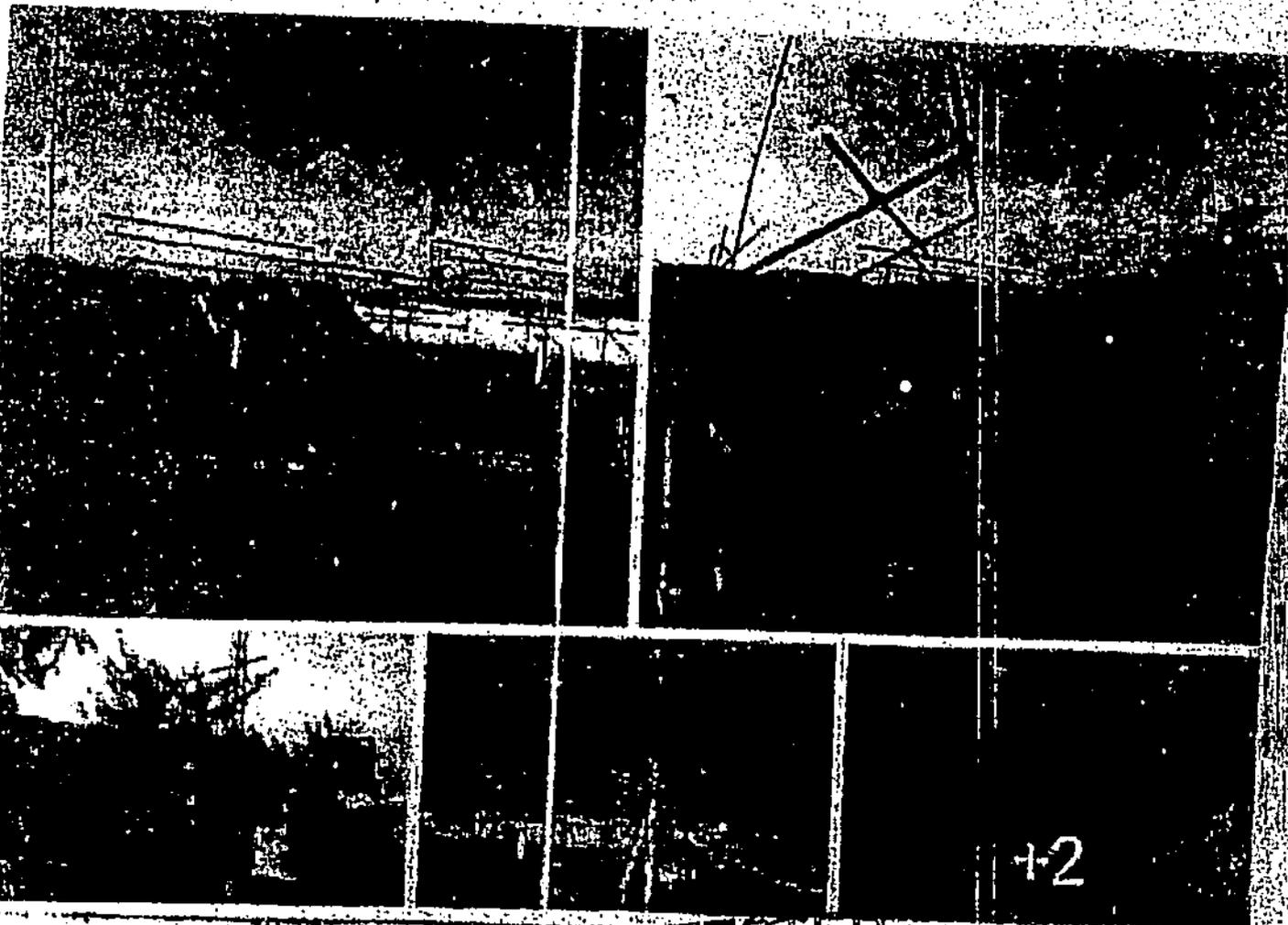
میلڈ رپورٹ درج روزنامہ سربل کے ایڈیشن 2985 ج
 جو فیملی دستگیر حیدر آئل فیملی کے حوالہ کیا گئی۔ مزید کارروائی ہونے
 پر امتیاز والا صاحبان کے نوٹس میں لانا چاہئے گا۔

صاحب عالی لعل بطالہ

اصول ہے

جٹمن: شکر درہ وائر سیلانی اسکیم ۱۹ ANX

جو کہ 25 کروڑ روپے کا پروجیکٹ تھا۔ اس وائر سیلانی پروجیکٹ کے لیے ایک بہت بڑا سولر پلانٹ لگایا گیا تھا اب وہاں بے ایک بھی سولر موجود نہیں کون لے کر گیا کہاں لے کر گیا ؟؟؟ اور اس پروجیکٹ کے لیے جو پائپ بجایا گیا تھا وہ کون اکھاڑ کے لے گیا؟ کہا ان چوروں کے ساتھ کوئی سرکاری آفیسر شامل تھا ؟؟؟ یہ تو سچی انکوائری ہونے کے بعد ہی پتہ چلے گا انشاء اللہ۔ آخر یہ سولر گئے کہاں زمین کھا گئی یا آسمان چور کوئی نہ کوئی نشانی ضرور چھوڑتا ہے اگر DPO صاحب نے DIG صاحب نے ایمانداری سے انکوائری کی تو انشاء اللہ دودھ کا دودھ پانی کا پانی ہو جائے گا۔ شکر درہ کے بچے بچے کو پتہ ہے کہ یہ سب کچھ کون لے کر گیا ہے ہاں اگر بوجھے والا کوئی ایماندار آیا۔ شکر درہ سے کروڑوں روپے کا پائپ غائب ہو گیا کون لے کر گیا کس نے ایسے تقسیم کیے چور اتنے بہادری سے پائپ کیسے لے کر گئے کون سیورٹ کر رہا تھا ان چوروں کو؟؟؟



+2

کالی چابی

کالی چابی

Abdul Mehad

ANNEX 19

لیکن ایس ایچ او شکردرہ جاوید خان کے زیر سایہ تمام سولر پینل چوری کر لیے 15 لاکھ روپے کی اور ابھی پائپ لائن اکھاڑنے پر شروع ہو چکے ہیں چوروں کے نام مندرجہ ذیل ہیں۔

عمر گل ولد محمد حنیف محلہ تتر خیل شکردرہ۔

افسر خان ولد اشرف خان۔

محمد فاروق ولد ابرار حسین ولد محمد اشرف محلہ تتر

خیل۔

محمد یارون ولد فدا حسین محلہ قریشان۔

سید اعجاز حسین شاہ سکھ نولہ بنگی خیل۔

جس پر سولر پینل فروخت کر دیے ہیں اس کا نام ہے محمد اسحاق ولد اللہ داد خان محلہ چکر کوٹ شکردرہ اس کی چھت پر لگی ہوئی ہیں۔

اور ابھی یہ لوگ رات کے تاریکی میں دو تین بجے ایکسویٹر کے ساتھ پانی کا پیپ لائن اوکاڑے میں ایک پک اپ کی قیمت 2 لاکھ روپے بنتی ہے پولیس سٹاف میں ایس ایچ او جاوید خان حوالدار رحمان اللہ سپاہی محمد قاسم اور ایس ایچ او کے گن مین یہ ان چوروں کی سرپرستی کر رہے ہیں اور ان کے نگرانی میں شکردرہ واٹر سپلائی سکیم تباہ ہو چکی ہے لہذا اپ صاحبان سے مودبانہ گزارش کرتے ہیں کہ یہ شک اپ اس چیز کی انکوائری غیر جانبدارانہ کریں اگر سیچ ثابت ہو گئے تو چوروں کے خلاف ایف آئی آر کائی جائے اور پولیس میں کے خلاف ڈیپارٹمنٹل کارروائی ہونی چاہیے بہت ظلم شروع ہوا ہے اور ان سب کا اپ لوگ

POSTED



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

No. 2378/GC

dated Kohat the 14-3-2022.

To: The Assistant Director,
Federal Investigation Agency,
Cyber Crime Zone, Peshawar.

Subject: DAILY DAIRY NO. 09 DATED 16.02.2022 PS SHAKARDARA KOHAT.

Memo: -

It is submitted that according to subject cited above one Khalid Mehmood is using fake ID on Facebook on the name of Da Khyber Golona page and page Sheri Khan and Samar Khan in which he uploaded baseless allegations against Police and elders of the area.

It is therefore, requested that necessary action may please be taken against above named person according to rule under intimation to this office, please.

Relevant documents enclosed ()

(MUHAMMAD SULEMAN) PSP
DISTRICT POLICE OFFICER
KOHAT

No. 2379/GC ✓

Copy to SHO PS Shakardara Kohat for information.

ATTESTED



83

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

No. /GC dated Kohat the 1-12 /2021.

To: The Assistant Director,
Federal Investigation Agency,
Cyber Crime Zone, Peshawar.

Subject: DAILY DAIRY NO. 09, DATED 27.11.2021 PS SHAKARDARA
KOHAT.

Memo: -

It is intimated that according to subject cited above one Khalid Mehmood is using fake ID on Facebook on the name of Da Khyber Golono page and page Sheri Khan and Samar Khan in which he uploaded baseless allegations against police and elders of the area.

It is therefore, requested that necessary action may please be taken against above named person according to rule under intimation to this office, please.

Encl:- (03 photograph)


DISTRICT POLICE OFFICER,
KOHAT

No. 14888 /GC

Copy to SHO PS Shakardara for information.

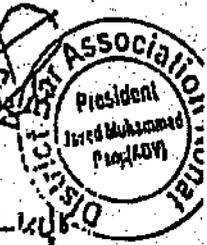
~~ATTACHED~~

پندرہویں ایف ڈی اے کے اجلاس کی فہرست

- | | |
|--|---------------------------------------|
| ۲۱۔ منظور منگوری | ۱۔ شوکت عرف شوکتی |
| ۲۲۔ جمیل ڈوے کے | ۲۔ ظاہر خان بازار عبداللہ شاہ محلہ |
| ۲۳۔ کلمہ شکر آباد | ۳۔ علاؤ الدین محمد زئی |
| ۲۴۔ خالد شکر آباد | ۴۔ شاہ اعظم محمد زئی |
| ۲۵۔ جمیل شاہ محمد زئی | ۵۔ فییم خرماتو |
| ۲۶۔ منظور شاہ محمد زئی | ۶۔ نقیب علی زئی |
| ۲۷۔ ہمایون خرماتو | ۷۔ سلیمان جنگل شیل ملک آباد |
| ۲۸۔ جمیل خان محمد زئی | ۸۔ فضل خان |
| ۲۹۔ نور علی استروئی | ۹۔ کفایت اللہ ولد حمایت شاہ |
| ۳۰۔ سلیمان بہزادی پکر کوٹ | ۱۰۔ بہایت شاہ ولد حمایت شاہ |
| ۳۱۔ دوست محمد محمد زئی | ۱۱۔ شاہ فیروز شیخان |
| ۳۲۔ آخیر زمان محمد زئی | ۱۲۔ ہجو ازاد |
| ۳۳۔ واجد | ۱۳۔ انوار بازار |
| ۳۴۔ عمران | ۱۴۔ عثمان |
| ۳۵۔ عام نوبیہ بازار | ۱۵۔ بنگلی |
| ۳۶۔ صفان | ۱۶۔ فرید سوزگل |
| ۳۷۔ شہزادہ رضی اویس وکیل کے کاسوں میں مداخلت | ۱۷۔ ریاض کالج ناؤن قسطنطنیہ طاہر وکیل |
| ۳۸۔ بی ضمانت نامہ 100 روپے کی پیش رویت ہے | ۱۸۔ تنویر میرا احمد شیل |
| ۳۹۔ تنویر کالج ناؤن | ۱۹۔ شاہد کالج ناؤن |
| ۴۰۔ خیر مراد فیضی کالج ناؤن | ۲۰۔ دینے |
| | ۲۱۔ تنویر کالج ناؤن |


 Advocate for Hussain Bukhari
 Advocate
 Courts Kohat
 03339610779

ATTACHED

جاوید محمد ایڈووکیٹ
 ڈائریکٹر DBA کوہاٹ

 District Bar Association
 Kohat
 President
 Jaaved Muhammad
 (P.O. 457)

- ۱۔ جناب اسٹریٹ ایڈووکیٹس ایسوسی ایشن کوہاٹ
- ۲۔ جناب DPO کوہاٹ

اعدالت محترمہ فرمائے تم صاحبہ ADJ-VI چائلڈ پروٹیکشن کورٹ کوہاٹ

243
5-511/8

نقدمبر 16-5-22. آئندہ پیش SPL 133/21

عنوان مقدمہ سرکار بیگم شاہد حسین

دلت نمبر 260 مورخہ 22-8-21 جم DCN SA قانہ اسر زئی

ضامن (د) خالد محمود ولد ملک ساج انوار
دارت گرفتاری بیگم شاہد حسین
بذریعہ سیدنا محمد شکیل سکر درہ ہنر لائی توابع
0832-9643018

داخ ہو کر مقدمہ بالا میں آئندہ تاریخ پیش 22-8-21 کے لئے جاری مقرر ہے
چونکہ ضامن بالا ذریعہ درانتہ طور پر حاضر عدالت ہذا نہیں ہوتا ہے لہذا حکم ہوا کہ مذکورہ بالا کو
گرفتار کر کے تاریخ مقررہ پر عدالت ہذا میں پیش کیا جائے۔

آج تاریخ 22-8-21 کو یہ احکام جاری شد

ADJ-VI Child Protection Courts Kohat



10848

ATTACHED

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر نمبر 152 مجموعہ ضابطہ جرداری

شکر دروہ	خلع کو جاوہر
31	6
113	02:00 وقت 16:00 بجے
تاریخ آؤت رپورٹ 02/02/23	تاریخ 02/02/23
16:20 بجے	17:00 بجے
نام و کنوت اطلاع دہندہ	نام و کنوت ملحقہ
مختصر کیفیت جرم (موردہ) حال اگر کچھ لیا گیا ہو۔	
جائے وقوعہ صلاحتہ سے درست	
نام و کنوت ملزم	
کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا تو وجہ بیان کرنا	
تقاضے روائی کی تاریخ و وقت	

ابتدائی اطلاع نے درج کرو۔ اس وقت ایک تحریری مراسلہ جناب خان محل ASI بدست کینسل احمد اللہ 310 موصول ہو کر درج ذیل قلم بخبرستان انسپریٹس کے اطلاع ملنے پر سول ہسپتال شکر دروہ آیا۔ امیر جنسی روم میں مجروح شد امتیاز ولد جاوہر مسلم کٹر محلہ عمر خیل لکھنؤ لکھنؤ مقبول جو عبداللہ ولد سید محمد علی کٹر محلہ عمر خیل موجود یا کٹر امتیاز مجروح ہوئے یو سی کے عالم میں ہے۔ سہمی محمد لوقتر ولد سید محمد علی لکھنؤ 27 سال شناختی کارڈ نمبر 9-5719480-14301 موبائل نمبر 220 0348746 بحق مقتول ء مجروح محمد لوقتر نوید رپورٹ کرتا ہے کہ اہر روز میں لوقتر بمقام بالاکھتر خود میں موجود تھا کہ اطلاع ملی کہ برادر ام لوبد اللہ ء خالہ زاد اعتقاد پر کسی نے باء ارادہ قتل خائننگ کر کے زخمی ہو کر ہسپتال شکر دروہ لائے تھے جہاں میں فرزا ہسپتال شکر دروہ آیا۔ امیر جنسی روم میں برادر ام لوبد اللہ قتل شدہ پڑا تھا اور خالہ زاد امتیاز بحالت مجروحیت بے ہوش پڑا تھا۔ معلومات ہونے پر معلوم ہوا کہ برادر ام لوبد اللہ خالہ زاد امتیاز پر سہمی خالہ زاد شراز ولد جاوہر مسلم جو کہ مجروح امتیاز بالاکھتری ہے باء ارادہ قتل خائننگ کر کے جسٹس خائننگ سے برادر ام لوبد اللہ تک سزا چھٹی ہو چکا ہے۔ اور خالہ زاد امتیاز و سہمی ہو چکا ہے، وہ بعد ازاں بے ہوش ہو کر برادر ام لوبد اللہ ء امتیاز بالاکھتری سے فرزا کو نشتر کرنے میں لگے تھے۔ لیکن وہ خفا تھا۔ میں برادر ام لوبد اللہ ء

AT

مقتول لوفی اللہ کو فائرنگ کر کے قتل کرنے اور خالہ امتیاز بالاکو
 نامزد کر کے زخمی ہونے کا برخلاف خالہ زاد فرار ولد جاوید
 سلیم بالاد عویداریوں، دستخط نشان انگلوعطا رپورٹ بالاکو
 تاشد رضوان اللہ سا جدید ولد سعید محل سکڑ محلہ سرخیل نے کی دستخط
 نشان انگلوعطا کارروائی کی جس میں خالہ امتیاز بالاکو رپورٹ خود نشان
 درج بالا ہو کر لکھنا یا درست تسلیم کر کے لکھنا رپورٹ خود نشان
 انگلوعطا تکی حکیم رضوان اللہ سا جدید نے رپورٹ بالاکو تاشد
 نشان انگلوعطا ثبت کیا جسکی میں تصدیق کرتا ہوں، مقتول لوفی
 اللہ کے کاغذات میں، مکتوب امتیاز کا نقشہ ضرر مرتب کر کے زیر
 حفاظت شاہ ایمان $\frac{31}{44}$ حوالہ ڈاکٹر صاحب پوری، مکتوب رپورٹ سے
 صورت جراثم بالاکو پائی جا کر مراسلہ بدست تکمیل الجبر اللہ 310
 بطور پینل رپورٹ ارسال تھا ہے، بعد چیک اپرگیا FIR کے بغرض
 تفتیش حوالہ KBI سٹاف ہوئے، دستخط انگریزی خان قتل ASI فورسہ
 02 023 کارروائی عقائد آئندہ مراسلہ حرف بحرف درج بالا ہو کر
 بر حسب جراثم بالاکو پائی ہو کر بقول FIR سے مراسلہ لکھنے لکھنے
 حوالہ KBI سٹاف کیا جاتا ہے، پینل رپورٹ گزارش ہے۔

M. M. Khan
 MHC-PS-SHD
 02-06-023

موقوفہ 177/23 کی حوالہ دینے کے لئے
 مسلم لکھنؤ یونیورسٹی
 صاحبہ
 ممبران

ACCEPTED

اطلاع کے لیے اطلاع دہندہ کا دستخط ہو گا یا اس کی ہر نشان لگایا جائے گا اور اگر تحریر کنندہ ہر نشان لکھنے والی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الف بیاں سرخ رنگ میں لکھی جائیں گی۔



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29
Forensic Science Laboratory

Police Investigation, Khyber Pakhtunkhwa
29-B1, Phase-V, Hayatabad, Peshawar.

REPORT OF THE FIRE ARMS EXPERTS

Laboratory No. FA-13-6541-0-2023 Received the sealed parcel on 15-06-2023

LW FA-13-6144-0-2023

At FSL from SHO P.S Shakardarra District Kohat

The seals on parcels were found intact.

F.I.R No. 113 dated 02-06-2023 U/S 302/324PPC PS Shakardarra District Kohat

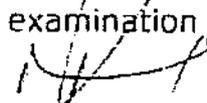
F.I.R No. 115 dated 03-06-2023 U/S 15AA PS Shakardarra District Kohat

1. P.No.1 having three seals of JK One 30 bore pistol No.101 alongwith five
Containing. 30 bore live cartridges
2. P.No.3 having two seals of Four 30 bore crime empties duly marked
Firearms experts Containing. C1 to C4.
3. Five 30 bore live cartridges for test.

NOTE: - The exhibits were signed by the experts.

OPINION:- Microscopic examination of the case has revealed that the four 30 bore crime empties duly marked C1 to C4 were fired from 30 bore pistol No.101, in question in view of the following major points i.e. striker pin marks, breach face marks and ejector marks etc are similar.

- Note: - (1) One test empty is being sent in the parcel of the pistol.
(2) Any report without embossing marks is not genuine.
(3) The contents of the parcel were under our immediate custody until the examination was completed.


FIRE ARMS EXPERT


FIRE ARMS EXPERT

No. 4162 /FSL, Dated 21-6 /2023

The opinion of the Fire Arms Expert is forwarded to SP/ Inv: Kohat

The receipt may be acknowledged and the exhibits collected from this Laboratory.ab

RECEIVED


DIRECTOR
Forensic Science Laboratory
Police Investigation, Khyber Pakhtunkhwa,
Peshawar.
Ph: 091-9217394 Fax:091-9217251



49

30

Forensic Science Laboratory

Police Investigation, Khyber Pakhtunkhwa
29-B1, Phase-V, Hayatabad, Peshawar.

REPORT OF THE FIRE ARMS EXPERTS

Laboratory No. FA-13-6144-0-2023 Received the sealed parcel on 07-06-2023

At FSL from SHO P.S Shakardarra District Kohat

The seals on parcels were found intact.

F.I.R No. 113 dated 02-06-2023 U/S 302/324PPC PS Shakardarra District Kohat

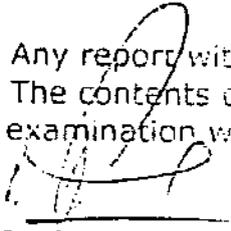
1. P.No.3 having three seals of AG Four 30 bore crime empties now marked
Containing. C1 to C4.

NOTE: - The crime empties were signed by the experts.

OPINION:- Microscopic examination of the case has revealed that the four 30 bore crime empties marked C1 to C4 were fired from one and the same 30 bore weapon, in view of the following major points i.e. striker pin marks, breach face marks and ejector marks etc are similar.

NOTE: - (1)

- (2) Any report without embossing marks is not genuine.
(3) The contents of the parcel were under our immediate custody until the examination was completed.


FIRE ARMS EXPERT


FIRE ARMS EXPERT

3967 FSL, Dated 13-6/2023

The opinion of the Fire Arms Expert is forwarded to SP/ Inv: Kohat

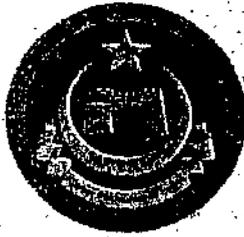
The receipt may be acknowledged and the exhibits collected from this Laboratory.

ATTACHED


DIRECTOR

Forensic Science Laboratory
Police Investigation, Khyber Pakhtunkhwa,
Peshawar.

Ph: 091-9217394 Fax:091-9217251



E
ANX. E, 30
OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-920116 Fax 920125

No. 5467 /PA dated Kohat the 18/9/2023

FINAL SHOW CAUSE NOTICE

1. I, **Mr. Farhan Khan PSP, District Police Officer, Kohat** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you **SI Javed Muhammad the then SHO PS Shakardara** as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 3598-99/PA dated 07.07.2023.
- ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.
I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

a. ***That you while posted as SHO Police station Shakardara is alleged to have supported /aided the criminals involved in the theft of OGDCL pipeline Shakardara.***

b. ***Your above act shows in-efficiency, irresponsibility and professional gross misconduct on your part.***

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules *ibid*.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

5. The copy of the finding of inquiry officer is enclosed.

ATTACHED

DISTRICT POLICE OFFICER,
KOHAT



No. 3598-99/PA

33

Office of the
District Police Officer,
Kohat

Dated 07-7-2023

CHARGE SHEET

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

- i. That you while posted as SHO Police station Shakardara is alleged to have supported / aided the criminals involved in the theft of OGDCL pipeline Shakardara.
- ii. Your above act shows in-efficiency, irresponsibility and professional gross misconduct on your part.

2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.

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

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

4. A statement of allegation is enclosed.

ATK


DISTRICT POLICE OFFICER,
KOHAT

سوال چارج ٹیکس نمبر 3598.99 چارج جناب DP صبا
2023-7-7

کوہاٹا معروف خدمت بنوں - یہ تم بیان کردہ التزام میں کوئی حقیقت
موجود نہیں ہے۔ التزام میں گھسٹ اور بے بنیاد ہے۔ کیونکہ OGDc تنصیبات
کی حفاظت کیلئے کنٹرل ڈیٹا سٹرڈ رینک کا آفسر موجود ہے۔ اور ان کی زیر
نگرانی دو بلاٹون کے سر تنصیبات ہے جبکہ سنٹروں کی تعداد میں سلورڈ
تیارڈ موجود ہیں۔ ان تنصیبات کی حفاظت کیلئے یہ لاکھوں ادر کردوں
کی تنخواہ لے رہے ہیں۔ اور ان تنصیبات کی حفاظت ان کی ذمہ داری
ہے۔ اور 4 لاکھ تنخواہ موبائل کارڈ یاں بمعہ غیر لغوی ان تنصیبات پر
ڈیوڈنٹ کرتے ہیں۔ لیکن بحقیقت SH5 گمانہ ٹکڑہ جس میں
ڈیوڈنٹ کرنے سے اور سلورڈ والوں نے نہ تو ایک شخص یا ایک چوری
بیان کردہ 5 اور سلورڈ والوں نے نہ تو اطلاع دی ہے۔ سن SH5 نے بطور ذمہ
وال پلٹا ہے۔ اور نہ پولیس کو اطلاع دی ہے۔

دار آفسر حوض 4 2023 03 04 05
بمع یاٹب سے بھری یاٹب ایک بلر کر ملزمان کے خلاف مقدمہ علنا 58 مور

4 3 جرم 148-379 PP گمانہ ٹکڑہ درج رجسٹر کیا - بھر مور 5 4 23

کوٹا 04D یاٹب کاٹا کر چوری کرنے والے ملزمان فرہاد اللہ کی یاٹب ایک بلر کر
جسے خلاف مقدمہ علنا 6 مور 5 4 23 6 ملزمان بلر کر قتلہ خلاف

درج رجسٹر کیا - بھر مور 5 4 23 9 کو چھ ملزمان بلر کر قتلہ درج 2
مقدمہ علنا 93 مور 5 4 23 9 جرم 148-379 گمانہ ٹکڑہ درج 2

کیا - بھر مور 5 4 23 25 کو چھ ملزمان OGD یاٹب کاٹے ہوئے گرفتار
کرتے قتلہ خلاف مقدمہ علنا 106 مور 5 4 23 25 جرم 148-379 PP

گمانہ ٹکڑہ درج رجسٹر کیا - بھر مور 6 23 3 کو یاٹب سے بھری گاڑی

ATK

پٹر کرپشن ملزمان کو گرفتار کر کے جتنے خلاف مقدمہ عدالت 114 مورخہ
 6/3/23 جرم 379-427 PPC تھانہ ٹکدرہ درج رجسٹر کیا۔ پھر مورخہ
 6/14/23 کو چوری کی بائب سے جری تھانہ پٹر کرپشن ملزمان کو گرفتار کر کے
 جتنے خلاف مقدمہ عدالت 184 مورخہ 6/14/23 جرم 379-427 PPC تھانہ ٹکدرہ
 درج رجسٹر کیا۔ پھر مورخہ 6/17/23 کو چوری کی بائب سے جری تھانہ پٹر کرپشن
 کو پٹر کرپشن کو گرفتار کر کے جتنے خلاف مقدمہ عدالت 25 مورخہ 6/17/23
 379 PPC تھانہ ٹکدرہ درج رجسٹر کیا۔ تمام FIR کے نقولات اور تھانہ
 میں پڑے چوری شدہ بائب کی فوٹو بطور ثبوت لف ہے۔
 جہاں تک الزامات کا تعلق ہے۔ ملک رشید اور اسکے چند کارندے بائب
 چوری میں ملوث ہونے کی شکایات آسٹریا بالاصحابان کو کر رہے ہیں۔
 ملک رشید اور اسکے کارندوں سے سال 2022 سے میرا ٹیل چلا رہے۔
 ٹیل کی وجہ یہ ہے کہ یہاں OC D اپنی نے تھانہ ٹکدرہ سینٹرل سٹریٹنگ
 ایک ایک دیا تھا۔ ایک شخص کو قتل کر کے جسے جرم 302 PPC
 کر دیا تھا۔ پھر امتیاز نے ایک شخص کو قتل کر کے جسے جرم 302 PPC
 تھانہ ٹکدرہ درج رجسٹر کیا۔ ڈرائیور امتیاز رولوشن سوا اور
 عرصہ کے بعد اس وقت 25/5/23 فرید خان نے ان کو گرفتار کر کے
 تقریباً 7 مہینے جیل میں گزارنے کے بعد ضمانت پر رہا ہو کر ملک
 بھجوا دیا۔
 رشید نے دوبارہ تھانہ لاہور ایک ایک بڑی کسٹ ڈرائیور لینے کا کہا
 جس نے اس وقت کے SDPہ نذر حسین خان کے نوٹس
 میں لایا۔ آخر 25/5/23 تھانہ میں لایا گیا۔ اس وقت کے SDPہ جناب سہیل ظا
 صاحب کے نوٹس میں لایا گیا۔ اس نے حکم دیا کہ امتیاز
 ڈرائیور اپنے سامعہ کو لے کر لاہور آئے۔

ATK

کو نقصان پہنچ سکتا ہے۔ ملک رشید کو یہ وہ دوسرے ڈرائیور کا بندہ ہے
 کریں۔ حالات واقعات ملک رشید کے نوٹس میں لائے گئے۔ لیکن
 ملک رشید لقمہ تھا۔ نہ ڈرائیونگ میرا بچا اسیا زکرے گا۔ ورنہ
 جمع اتنی تک اب واپس کریں۔ میں نے جواب دیا ہے کہ گاڑی تو اپنی
 نے کھانے کو دی ہے۔ آج کو ہم واپس نہیں کر سکتے، اس بات پر ملک
 رشید نے پتہ لگایا کہ یہی جائز ان سے سابقہ ٹریفک ختم کر کے گاڑی کھانے
 سے واپس جمع کرائی۔ جسکا رپورٹ بحوالہ ملغزہ روزنامہ 2022ء 24
 کھانہ ٹکڑے درجہ روزنامہ کیا۔ نکلے بطور ثبوت لفظ ہے۔ اس سے
 بعد ملک رشید نے خالد محمود اور شوکت محمود کے ذریعے فیک DP کے ذریعے
 ہمارے خلاف پوسٹیشن دینا شروع کی۔ تو اس وقت سے DP صاحب
 کے نوٹس میں حالات واقعات لاکر بعد انکو آٹری کے سہیل خالد صاحب
 DP نے ان کے خلاف FIA کو ڈاکٹ انٹرنری جاری کیا۔ اور آٹری
 پریشر میں نہ آنے کا کہا۔ پھر ٹکڑے میں معلوم ملزمان طارق پوسٹا
 سائرس سے 70 لاکھ کی ڈیکٹی کی معلوم ملزمان کے خلاف مقدمہ درج
 ریڈ کر کے پھر ملک رشید اور ملک خالد محمود نے فیک DP سے شروع
 شروع کیا۔ کہ یہ ڈیکٹی اشتہاروں نے کی ہے۔ اور SHH کا این میں
 حقہ ہے۔ لیکن اللہ پاک سے فیصل و کرم سے اور آفسران بال اصحاب
 کے اعتماد کی وجہ سے 12 یوم میں ملزمان کو ٹریس کرنے گرفتار
 کر کے ان سے 70 لاکھ روپے کی ریکوری کی گئی۔ عوام لیگار ڈھانہ
 ٹکڑے میں جو ہے۔ پھر حالات واقعات اس وقت سے DP
 جناب بلیمان صاحب کے نوٹس میں لاکر اس نے بھی FIA کو ان
 کے خلاف قانونی کارروائی کیلئے ڈاکٹ انٹرنری جاری کیا۔ دلوں

ATTACHED

ڈاکٹوں کے نقولان بطور ثبوت لے لیے ہیں۔ علاوہ ازیں ملک رشید کے دو بھائی افرار اور آوازو لیسران جاوید سلیم آئیں جسے موزوں سمجھتے ہیں۔ اور نئی کی حالت میں اسلام نے تکرار درہ بازار اور قلیوں میں مسلح ہوتا تھا۔ آوازو کے خلاف FIR جرم DCNSA/5AA میں اور حال میں ملک رشید کے دوسرے بھائی کو نسلر نوید کو سوچے سمجھے منصوبے سے لے کر بھلا کر بے دردی سے قتل کیا۔ فرارو کے خلاف مقدمہ عدالت 113 مورخہ 23 جرم 324-302 PPC تھا تکرار درہ درج رہ گیا۔ FIR بطور ثبوت لے لیے ہے۔ بدوران اشارو گن فرارو سے آ کر قتل ہو گیا۔ جیل کو جھٹ میں بند ہے۔ بعد میں اس کے وہ قتل ہوئے۔ کئی بیات معلومات لے کر جس نے تہلایا کہ بعد میں اس کے وہ قتل ہوئے۔ اسے بھائی آوازو نے لے کر لیا ہے۔ آوازو کو لیسول سمیت تکرار کر کے جس کے خلاف مقدمہ عدالت 115 مورخہ 23 جرم 5AA تھا۔ تکرار درہ درج رہ گیا۔ اور وہی لیسول آنا رمل خان زاہد نے بغرض پنجریہ SA فریڈا اور لیبارٹری بمجواہ۔ جو کہ رولٹ پاسٹ + آبا۔ ان کے جوشیات کی بنا پر ملک رشید ہمارے خلاف آفسران بالا صاحبہ اور فیس بک پر پوسٹنگ کے اور غلط الزامات لگا کر آفسران بالا صاحبان کو اشتعال دلانے کی کوشش کر رہے ہیں۔ الزام میں کوئی صداقت نہیں ہے۔ استدعا ہے کہ جانچ شیٹ اور انکو آٹری کو فائل کرنے کا حکم صادر فرمایا جاوے۔ اور ملک رشید اور ان کے چند کزنوں کے خلاف جو کئی شکایتیں کالونی کاروائی کرنے کی استدعا ہے۔

ATK/11

رشید صاحبہ کی شناخت - Political



F

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

ANX "F" 38

ORDER

This order will dispose of departmental proceedings against Offg: Sub Inspector Javed Muhammad, the then SHO PS Shakardara of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014).

Facts arising of the case are that he while posted as SHO Police Station Shakardara is alleged to have supported / aided the criminals involved in the theft of OGDCL pipeline Shakardara.

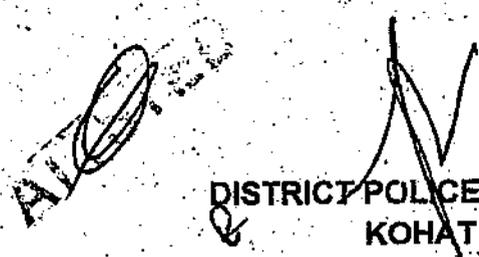
The above act of the defaulter SI shows in-efficiency, irresponsibility and professional gross misconduct on his part.

For the above, serious / professional misconduct of the defaulter SHO, charge sheet alongwith statement of allegations was served upon the accused officer. SP Investigation Kohat was appointed as enquiry officer to scrutinize the conduct of accused officer and stated therein that secret probe from the villagers, source report and personal hearing of the delinquent officer; charges leveled against him seems to be genuine. During the course of enquiry he has found guilty. It imprints bad impact in the minds of public. The ubiquitous impression of Khyber Pakhtunkhwa Police has badly damaged by the illegal act of the delinquent officer.

In view of above, the accused officer was served with Final Show Cause Notice to which he submitted reply but he did not advance any defense and relied in his reply to the charge sheet.

The accused official was heard in person in Orderly Room held in this office on 18.10.2023 and he is afforded full opportunity of defense but he failed to submit any plausible explanation, therefore, the charges leveled against him have been established.

In view of the above and available record, I agree with the findings of enquiry officer, therefore, in exercise of powers conferred upon me under the rules ibid I, Farhan Khan, District Police Officer, Kohat hereby award a major punishment of reduction from substantive rank of Offg: Sub Inspector to Assistant Sub Inspector. He is reinstated in service from the date of suspension.


DISTRICT POLICE OFFICER,
KOHAT

OB No. 877

Dated 18-10-23

No. 611-13 IPA dated Kohat the 18-10-2023.

Copy of above to the:-

1. Reader/Pay officer/SRC/OHC for necessary action.

57

BEFORE THE HONORABLE REGIONAL POLICE
OFFICER KOHAT

ANX. G. 39

APPEAL AGAINST THE ORDER OF THE
DISTRICT POLICE OFFICER KOHAT
BEARING OB No. 877 DATED 08-10-2023 VIDE
WHICH THE APPELLANT WAS REVERTED
FROM THE RANK OF OFFICIATING SI TO
ASI

Respected Sir,

With great respect and veneration the appellant may kindly be allowed to submit the following for your kind and sympathetic consideration.

FACTS OF THE CASE:

1. That the appellant was posted as SHO P.S Shakardar w.e.f 31-03-2023 till 04-07-2023.
2. That appellant being SHO P.S Shakardara, discharged his duties as per law and with great interest of public, showed his capacity, hardworking, efficiently made good progress, recoveries and arrest of accused in numerous FIRs as per law.
3. That on the basis of enquiry, appellant was awarded major punishment of reduction from substantive rank of Sub-Inspector to Assistant Sub Inspector.
4. That the inquiry officer has not recorded statement of any official regarding the inability of the appellant neither any reason recorded in inquiry regarding in-efficiency or irresponsibility.

FILED

5. That the statements of biased and partial witnesses were recorded against appellant who were involved in illegal activities against whom numerous FIRs were lodged for the stealing of OGDCL gas pipe lines and others.
6. That the fair / proper procedure according to E&D rules were not adopted.
7. That the appellant is aggrieved from the impugned order of the DPO Kohat, appellant present appeal on the following grounds:

GROUND OF APPEAL:

- a) That the order of the competent authority is not in accordance with law and facts thus the impugned order of punishment deserves to be set aside.
- b) That during enquiry, the appellant submitted his reply to the charge sheet & final show cause notice to the enquiry officer. The whole enquiry proceedings were conducted in the absence of the appellant.
- c) That during enquiry, the enquiry officer recorded statements of 03 persons namely (1) Mehrab Gul S/o Arab Gul R/o Shakardara, Kohat (2) Mir Aslam, R/o Janak Shakardara (3) Malak Khalid Mehmood at the back of the appellant.
- d) That being defaulter official, the appellant was having an inherent legal right to be present throughout the enquiry proceedings in order to defend himself but by denying presence of the appellant the enquiry officer has acted against the law / rules and thus legally vitiated all the proceedings against the appellant.
- e) That in reply to the charge sheet, the appellant had mentioned that the statement of above mentioned persons are based on falls and fictitious information, as they and their families were charged in different FIRs which are annexed with the appeal. Moreover they were partial witnesses as they were grinding their AXE and having their personal grudges with the appellant.
- f) That in order to ascertain the real facts examination of the above mentioned statements was necessary in presence of the appellant but unfortunately this important aspect was ignored and they were preferred to be examined at the back of the appellant by worthy enquiry officer.

ATTACHED

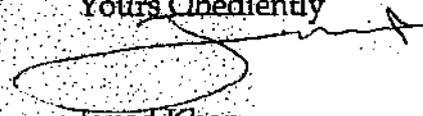
- g) That the charge sheet, final show cause notice and the impugned order of punishment indicate that the enquiry against the appellant was initiated on the complaint, where no statement of any official were recorded, neither the allegations leveled against appellant about stealing gas pipe line of the OGDCL were properly enquired nor to whom these were sold is disclosed in enquiry, it is also pertinent to mention that there is no source of information about appellant, also the District Security Branch report is very much clear regarding innocence of appellant.
- h) That the impugned punishment order does not fulfill the ends of justice, hence it is liable to be set aside.
- i) That the appellant is absolutely innocent and the punishment awarded to him is not legally justified.
- j) That the impugned order of punishment is unilateral, one sided arbitrary in nature, fanciful, capricious and being not in accordance with law is liable to be set aside.
- k) That the appellant is ready to take oath for the satisfaction of your honour regarding innocence of the appellant.

PRAYER:

In view of the above facts, it is very respectfully prayed that on the acceptance of the appeal, appellant may kindly be reinstated in his previous scale with all back consequential benefits.

Dated 07-11-2023

Yours Obediently



Javed Khan
ASI
Mobile # 0333-0564009

Encl:

- 1. Charge Sheet
- 2. Reply to the charge sheet
- 3. FIRs, Pictures
- 4. Order of Punishment

ATTACHED

H

ORDER.

ANX.H., 42

This order will dispose of the departmental appeal preferred by ASI Javed Muhammad No. 88/K of district Kohat against the order of District Police Officer, Kohat whereby he was awarded major penalty of reduction from the rank of Offg: Sub Inspector to substantive rank of Assistant Sub Inspector vide OIB No. 877, dated 18.10.2023. Brief facts of the case are that the appellant while posted as SHO PS Shakar Dara was alleged to have supported / aided the criminals involved in the theft of OGDCL pipeline Shakar Dara.

Proper departmental enquiry proceedings were initiated against him and SP / Investigation Kohat was nominated as Enquiry Officer. The Enquiry Officer after fulfillment of codal formalities submitted his findings wherein the appellant was found guilty of the charges leveled against him and recommended for major punishment under the relevant rules.

Keeping in view, the recommendations of the Enquiry Officer and circumstances of the case, the delinquent officer was awarded punishment of reduction from Offg: Sub Inspector to substantive rank of Assistant Sub Inspector.

Feeling aggrieved from the order of District Police Officer, Kohat, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in the office of the undersigned on 19.12.2023. From the perusal of the record, it has transpired that the appellant was promoted as Offg: Sub Inspector on 01.01.2021. He has not yet been confirmed as Sub Inspector. Consequently, he is holding the substantive rank of Assistant Sub Inspector. Section 4(2)(b) of the Khyber Pakhtunkhwa Police Rules 1975 (As Amended in 2014) provides that reversion from an Officiating rank is not a punishment. Thus the appellant is currently holding the substantive rank of Assistant Sub Inspector.

Foregoing in view, I, Sher Akbar, PSP, S.St, Regional Police Officer, Kohat, being the appellate authority, hereby set aside the punishment of reduction from the rank of Officiating Sub-Inspector to Assistant Sub-Inspector awarded by District Police Officer, Kohat vide order No. 877 dated 18.10.2023. The departmental enquiry conducted against the appellant stands pending before the District Police Officer, Kohat. He is, therefore, directed to pass a speaking order on the departmental enquiry conducted against the appellant strictly in accordance with the Khyber Pakhtunkhwa Police Rule 1975 (As Amended in 2014) within a period of 15 days after the receipt of the order of this office.

Order Announced
19.12.2023


Regional Police Officer,
Kohat Region

No. 174 JEC, Dated Kohat the 04/01/2024

Copy forwarded to District Police Officer, Kohat for information and necessary action w/r to his office Memo: No. 7819/LB, dated 30.11.2023. 02 Service Books, 01 Service Roll and Fauji Misal are returned herewith.

ATTACHED



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

I
ANX I, 43

ORDER

In compliance with the directives received from Worthy Regional Police Officer Kohat vide his office order Endst: No. 174/EC dated 04.01.2024 passed on the departmental appeal of ASI Javed Muhammad No. 88/ K (The then Offg: Sub Inspector) wherein, the WRPO Kohat being the appellate authority, set aside the punishment of reduction from the rank of Offg: SI to ASI awarded by this office Order Book No. 877 dated 18.10.2023. The departmental enquiry was kept pending and this office was directed to pass a speaking order strictly in accordance with Police Rules 1975 (As amended in 2014).

Facts arising of the case are that he while posted as SHO Police Station Shakardara was allegedly found to have supported / aided the criminals involved in the theft of OGDCL pipeline Shakardara, which show his malafide and professional gross misconduct on his part.

For the above, serious / professional misconduct of the defaulter SHO charge sheet alongwith statement of allegations was served upon the accused officer. SP Investigation Kohat was appointed as enquiry officer to scrutinize the conduct of accused officer. The enquiry officer after thoroughly probing into the matter, statement of villagers, source report and personal hearing of the delinquent officer has found him guilty of the charges leveled against him and recommended for award of one of the major punishment.

In view of above, the accused officer was served with Final Show Cause Notice to which he submitted reply which was found un-satisfactory and also he did not advance any plausible explanation in his defense during his personal hearing in O.R on 18.10.2023.

Since, the appellant has not yet been confirmed in his Substantive Rank of Sub Inspector. Therefore still he is holding the rank of ASI, hence reduction from Offg: Rank is not a punishment under the Rules ibid.

In view of the above and available record, I agree with the findings of enquiry officer, therefore, in exercise of powers conferred upon me under the rules ibid I, Farhan Khan, District Police Officer, Kohat hereby impose a major punishment of reduction in pay to initial stage in the same time scale for the period of 02 years with immediate effect and he is reinstated in service from the date of suspension.


DISTRICT POLICE OFFICER,
KOHAT

OB No. 209
Dated 08-3-24
No. 1872-79 /PA dated Kohat the 08-3-2024.

- Copy of above to the:-
1. Regional Police Officer, Kohat w/r to his office Endst: quoted above, please
 2. Reader/Pay officer/SRC/OHC for necessary action

J

ANX-J, 44

To

The Worthy,
Deputy Inspector General of Police,
Kohat Region, Kohat.

DEPARTMENTAL APPEAL AGAINST ORDER OB NO.209
DATED 08-03-2024 OF THE HON'BLE DISTRICT POLICE
OFFICER, KOHAT WHEREBY HE IMPOSED MAJOR
PENALTY OF REDUCTION IN PAY TO INITIAL STAGE IN
THE SAME TIME SCALE FOR THE PERIOD OF TWO
YEARS WITH IMMEDIATE EFFECT.

Respected Sir,

The facts given rise to the present departmental appeal are as under;

1. That appellant was posted as SHO PS: Shakardara on 31-03-2023 where he performed his duty till 04-07-2023 with clean sheeted conduct record and with entire satisfaction of his superiors.
2. That there is Oil Fields of OGDCL in the vicinity of PS: Shakardara where FC staff including security guards has been appointed under the supervision of a retired colonel Officer of Army to look after the security of the Oil Filed and Gas Pipelines.
3. That no complaint / FIR had ever been lodged by FC staff and security guards regarding stolen / sale or purchase of Gas Pipelines of OGCL before and during the posting of the appellant.
4. That appellant being the custodian of PS: Shakardara registered numerous FIRs and arrested many accused involved in theft / stealing of Gas Pipelines.
5. That OGDCL company assigned a Pickup Car along with a Driver namely Mr. Imtiaz to Police Station Shakardara in the year 2021. An FIR u/s 302 was lodged against said Driver (Imtiaz) and he remained absconder but later

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5/4/2024
SAC
Kohat
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ATTESTED

on, he was arrested and remained behind the bar for about 7 months. The Driver was then released on Bail.

6. That owner of the pickup vehicle (Uncle of Driver Intiaz) namely Mr. Malik Rasheed again requested to appoint Mr. Intiaz as Driver of the Pickup. As per instructions of high-ups, appellant refused to appoint him as Driver and asked the owner (Mr. Malik Rasheed) to arrange another Driver but he insisted to appoint his nephew (Intiaz) as Driver and lastly the owner withdraw his Contract/Agreement with OGDCL and returned back his Pickup Vehicle.

7. That stubbornly the owner of the Pickup Car started campaign against appellant on Social Media through different fake IDs/Profiles. Appellant brought the issue into the active notice of his superior's thereafter worthy DPO submitted a complaint before the FIA authorities for initiation of proceeding against Mr. Malik Rasheed Khan and others under relevant provision of law.

8. That it is also worth mentioning to bring to Your Kind notice that, Rs.70 Lacs were looted/stolen from a Post Master by unknown accused. Mr. Malik Rasheed and his team again started a campaign to defame the appellant on social media by up-loading false, frivolous and concocted allegations of having connivance with criminals/thieves. Later on, when criminals were arrested by the appellant and stolen property (amount) was recovered; appellant brought the matter into the notice of high ups and apprised them of continuous anti state campaign of Mr. Malik Rasheed and his team. The worthy DPO not only praised the role of the appellant but was also pleased to lodge another complaint before FIA authorities for initiation of proceeding under Cyber laws against Mr. Malik Rasheed and his team.

9. That it is also pertinent to bring into the notice of Your Kind Honour that other nephews and relatives of Mr. Malik Rasheed were/are involved in Drug Abuse and Illicit Trafficking and they were arrested in FIRs under

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sections 15-AA, 9-D, 302 & 324. The relevant record is available in PS Shakardara.

10. That in retribution, the said Mr. Malik Rasheed lodged complaints against the appellant through false, frivolous and concocted allegations of having links with groups, who are involved in stealing / theft of the Gas Pipelines. A Show Cause Notice was served upon the appellant which was replied by the appellant with cogent reasons and factual evidences.
11. That a slipshod inquiry was conducted and appellant was awarded major punishment of reduction from substantive rank of offg: Sub Inspector to Assistant Sub Inspector vide Order dated 18-10-2023.
12. That being aggrieved from the aforementioned order, appellant preferred Departmental Appeal on 07-11-2023 which was decided Vide Endst: No.174 dated 04-01-2024 by setting aside the impugned order No.877 dated 18-10-2023 with the directions that the inquiry conducted against the appellant shall stand pending DPO, who shall pass a speaking order a fresh within 15 days after receipt of the order.
13. That the Hon'ble DPO, Kohat vide order OB NO.209 DATED 08-03-2024 imposed upon the appellant major penalty of reduction in pay to the initial stage in the same time scale for the period of 02 years with immediate effect and re-instated from the date of suspension.

Hence appellant being aggrieved of the above mentioned impugned order and having the right of departmental remedy assails the same inter alias on the following grounds.

- A. That the authority has not treated the appellant in accordance with law, rules and policy on the subject and acted in violation of Article 4, 10A, 25 and 27 of the Constitution of Pakistan, 1973. From the bare perusal of the record presented by the appellant in his defense prima facie establishes the fact that he has been made an escaped goat in relations to

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influential figures. The office of DPO, Kohat is/was well aware of the fact that appellant was posted at the PS Shakardara for a short span of time and during this period he has lodged number of FIRs against well-known smugglers involved in gas pipe stealing's and it is also an established fact that appellant has performed his legal obligation to the entire satisfaction of his high ups and upon whose direction; appellant took strong action against the culprits. Whether a prudent mind can safely presume that a person who stood firm against the anti-state elements can be blamed with such shameful acts? Whether there are any direct or indirect evidence which may connect the appellant with such like activities. The answer is absolutely not.

- B. That section 16 of the Civil Servant Act, 1973 provide that every civil servant is liable for prescribed disciplinary action in accordance with prescribed procedure. In the instant case no prescribed procedure has been adopted therefore, the impugned penal order is nullity in the eyed of law and liable to be set aside.
- C. That the Hon'ble Supreme Court of Pakistan as well as the Hon'ble Peshawar High Court Peshawar and Khyber Pakhtunkhwa Service Tribunal have consistent view that in case of major penalty or where there are / were factual controversy, regular inquiry is sine qua non. In the present case, a slipshod inquiry has been conducted by the inquiry officer at the back of the appellant. Appellant has neither been associated with the proceedings nor any witness was examined in his presence. The question of cross examination does not arise. No statement whatsoever, which are recorded at the back and has not been scrutinized under the scrutiny of the cross examination. Such statement has no evidentiary value in the eyes of law and conviction cannot be ordered on such like statement.
- D. That the very nature of the charge sheet and statement of the allegations are general in nature and it does not provides the necessary details which could provide a fair opportunity to make and submit a legal defense. No conviction can be based upon such flimsy type of allegations.

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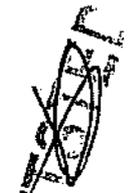
Accused is stated to be a favorite child of law and he is presumed to be innocent unless proved otherwise and the benefit of doubt always goes to the accused and not to the prosecution as it is for the prosecution to stand on its own legs by proving all allegations to the hilt against the accused. Mere conjectures and presumption, however strong, could not be made a ground for removal from service of civil servant [1999 PLC (CS) 1332 (FST)].... Unless and until prosecution proves accused guilty beyond any shadow of doubt, he would be considered innocent [1983 PLC (CS) 152 (FST)].

F. That the well-known principle of law "Audi alteram Partem" has been violated. This principle of law was always deemed to have embedded in every statute even though there was no express specific or express provision in this regard.

...An adverse order passed against a person without affording him an opportunity of personal hearing was to be treated as void order. Reliance is placed on 2006 PLC(CS) 1140. As no proper personal hearing has been afforded to the appellant before the issuing of the impugned order, therefore, on this ground as well the impugned order is liable to be set aside.

G. That the non provision of the inquiry report amounts to deprive a civil servant from confronting and defending himself from evidence that may go against him, which is against the provision of Article 10A of the Constitution of Pakistan, 1973. In the instant case copy inquiry report has been denied to the appellant, which fact is evident from the perusal of the final show cause notice.

H. That under the provision of Rule 14 of E & D Rule, 2011, the competent authority was under legal obligations to peruse the inquiry report and determine as to whether the inquiry has been conducted in accordance with prescribed procedure and whether the charge are proved or otherwise. The competent authority has made no such efforts and dismissed the appellant with a single stroke of pen, which is nullity in the eyes of law and liable to be interfered with by this Honorable Tribunal.

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It is therefore, most humbly prayed that the impugned order OB No.209 dated 08-03-2024 of the Hon'ble District Police Officer, Kohat whereby he imposed major penalty of reduction in pay to initial stage in the same time scale for the period of two years with immediate effect, may kindly be set aside.

Appellant



Javid Muhammad
ASI No.88/K
Police Force, Kohat.

Dated: ____ / ____ /2024

~~ATTACHED~~

WAKALAT NAMA

IN THE COURT OF Service Tribunal Peshawar 51

Javid Muhammad SUB-Inspector
Police Force, Kohat Appellant(s)/Petitioner(s)

VERSUS

The Inspector General of
Police - KPK and others Respondent(s)

I/We _____ do hereby appoint
Mr. Ali Bakht Mughal Advocate, High Court, Peshawar in the above
mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by



Ali Bakht Mughal
Advocate,
High Court, Peshawar
BC#:20-2135
17301-5926416-5
0321-9061598


Signature of Executants