

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

AMENDED SERVICE APPEAL NO. 489/2024

Azeem

VS

Police Department

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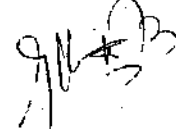
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THROUGH:

APPELLANT



(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
Cell# 0333-9390916

& 

(SHAKIR ULLAH TORANI)
ADVOCATE

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

AMENDED SERVICE APPEAL NO.489/2024

Azeem, Constable No.5256,
Police Lines Peshawar.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.

(RESPONDENT)

**AMENDED APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNALS
ACT, 1974 AGAINST THE ORDER DATED 07.05.2024,
WHEREBY REVISION PETITION OF THE
APPELLANT WAS ACCEPTED BY MODIFYING HIS
MAJOR PUNISHMENT OF REMOVAL FROM
SERVICE INTO MINOR PUNISHMENT OF
FORFEITURE OF ONE YEAR APPROVED SERVICE
AND HE WAS REINSTATED INTO SERVICE WITH
IMMEDIATE EFFECT AND HIS INTERVENING
PERIOD WAS TREATED AS LEAVE WITHOUT PAY.**

PRAYER:

**THAT ON THE ACCEPTANCE OF THIS AMENDED
APPEAL, THE MINOR PUNISHMENT OF
FORFEITURE OF ONE YEAR APPROVED SERVICE
OF THE APPELLANT MAY KINDLY BE SET ASIDE
AND HIS INTERVENING PERIOD MAY BE TREATED
ON FULL PAY BY MODIFYING THE ORDER DATED
07.05.2024 TO THAT EXTENT ONLY WITH ALL BACK
AND CONSEQUENTIAL BENEFITS. ANY OTHER
REMEDY, WHICH THIS HONORABLE TRIBUNAL
DEEMS FIT AND APPROPRIATE THAT, MAY ALSO,
BE AWARDED IN FAVOUR OF APPELLANT.**

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed in the respondent department as Constable and completed all his due training and has performed his duty with great devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performing.

2. That the appellant while posted at PS East Cantt Peshawar, charge sheet along with statement of allegations were issued to the appellant in which following baseless allegations were leveled against the appellant that it has been learnt through reliable source that during the confinement period ASI Nazar Gul and constable Azeem No.5256 (appellant) contacted the brother of the accused Yasir and demand 01 lac rupees and 02 09 MM pistols of which after mutual bargaining the brother confined accused handed over two 9MM (local made) Pistols to ASI Nazar Gul Khan and Constable Azeem. The appellant submitted his reply to the charge sheet in which he denied the allegations and clearly mentioned in his reply that he has not arrested Yasir nor did any illegal demand from him for his release and previously statement was taken from him under pressure by SDPO Cantt during preliminary inquiry which he denied and in respect of allegation of demand of 02 09 MM Pistols for mutual bargaining the appellant clearly mentioned in his reply that he has properly paid money for 02 09 Pistols and bought them from the relative of Yasir namely Ishtaq as Yasir was working in Arms Factory and had not made mutual bargaining with Yasir as he has no authority to release the accused Yasir and baseless allegations were leveled against him. **(Copies of charge sheet along with the statement of allegations and reply are attached as Annexure-A&B)**

3. That inquiry was conducted against the appellant in which no proper opportunity of defense was provided to the appellant as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, even the inquiry report is not provided to the appellant, however, statement recorded by Ishtaq during the inquiry proceeding was obtained by the appellant in which he clearly mentioned that Azeem Khan has obtained 02 09 MM pistols in lieu of payment. As the inquiry report was not provided to the appellant, therefore, he filed an application for provision of inquiry report, however inquiry report was not provided to him which

may be requisite from the department. **(Copy of statement of Ishtaq and application are attached as Annexure-C&D)**

4. That on the basis of baseless allegations, the appellant was removed from service vide order dated 15.12.2023 without issuing show cause notice to the appellant. The appellant filed departmental on 22.12.2023 against removal order dated 15.12.2023, which was rejected on 05.03.2024 for no good grounds. **(Copies of removal order dated 15.12.2023, departmental appeal and order dated 30.01.2024 is attached as Annexure-E,F&G)**

5. That the appellant after the rejection of departmental appeal filed service appeal in this Honorable Tribunal and also filed revision petition under 11-A of Police Rules 1975 (amended in 2014) to respondent No.1. The Revision Board decided the revision petition of the appellant on 07.05.2024, whereby revision petition of the appellant was accepted by modifying his major punishment of removal from service into minor punishment of forfeiture of one year approved service and he was reinstated into service with immediate effect and his intervening period was treated as leave without pay. **(Copies of revision petition and order 07.05.2024 are attached as Annexure-H&I)**

6. That as the appellant has filed the service appeal in this Honorable Tribunal against the order 15.12.2023 whereby the appellant was removed from service and his departmental appeal was also rejected on 05.03.2024 with the prayer to set aside these orders and reinstated him into service with all back and consequential benefits, however, respondent No.1 decided the revision petition of the appellant on 07.05.2024, wherein, revision petition of the appellant was accepted and he was reinstated into service with immediate effect by the department itself, but his major punishment of removal from service was converted into minor punishment of forfeiture of one year approved service and his intervening period was treated as leave without pay and as the appellant was reinstated into service by the department itself through an order dated 07.05.2024, but also imposed minor punishment upon him in that order and his intervening period was treated as leave without pay, therefore, the appellant requested this Honorable for permission to file amended service appeal due to passing of order dated 07.05.2024 on date fixed i.e 16.05.2024, which was allowed by the Honorable Tribunal on

61.05.2024. (Copy of order dated sheet dated 61.05.2024 is attached as Annexure-J)

7. That the appellant now wants to file the amended appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUNDS:

- A) That imposition of minor punishment of forfeiture of one year approved service upon the appellant and his intervening period was treated as leave without pay in the order dated 07.05.2024 is against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be modified to the extent by setting aside the imposition of minor punishment of forfeiture of one year approved service upon the appellant and his intervening period was treated as leave without pay.
- B) That baseless allegation were leveled against the appellant on which he was removed from service with conducting regular and proper inquiry to dig out the realty about the appellant, however, the appellant was reinstated into service on 07.05.2024 by the department itself by accepting his revision petition which means that the stance of the appellant was accepted by the department itself by removing him on baseless allegation, but minor punishment of forfeiture of one year approved service has imposed upon the appellant in the order dated 07.05.2024 along with treating his intervening period as leave without pay, which is also liable to be set aside by modifying the order dated 07.05.2024 to that extent only.
- C) That one allegation leveled against the appellant is that during the confinement period ASI Nazar Gul and constable Azeem No.5256 (appellant) contacted the brother of the accused Yasir and demand 02 09 MM pistols of which after mutual bargaining the brother confined accused handed over two 9MM (local made) Pistols to ASI Nazar Gul Khan and Constable Azeem, but the appellant and ASI Nazar Gul did not demand 02 09 MM pistols from Yasir for mutual bargaining and the appellant properly paid for the pistols and in lieu of payment he got the pistols from the relative of Yasir namely Ishtaq as Yasir was working in the Arms Factory, which can also be endorsed from the statement given by Ishtaq during the inquiry

proceeding, but despite that the appellant was removed from service on that baseless allegation, however, the appellant was reinstated into service on 07.05.2024 by the department itself by accepting his revision petition by admitting his stance on removing him from service on that baseless allegation, but minor punishment of forfeiture of one year approved service has imposed upon the appellant along with treating his intervening period as leave without pay which is also liable to be to be set aside by modifying the order dated 07.05.2024 to that extent only.

D) That other allegation leveled against the appellant is that during the confinement period ASI Nazar Gul and Constable Azeem No.5256 (appellant) contacted the brother of the accused Yasir and demand 01 lac rupees of which after mutual bargaining, but the appellant never demanded 01 lac rupees, but despite that the appellant was removed from service on that baseless allegation, however, the appellant was reinstated into service on 07.05.2024 by the department itself by accepting his revision petition by admitting his stance on removing him from service on that baseless allegation, but minor punishment of forfeiture of one year approved service has imposed upon the appellant along with treating his intervening period as leave without pay, which is also liable to be to be set aside by modifying the order dated 07.05.2024 to that extent only.

E) That in charge sheet it was mentioned that learnt through reliable sources but it was not specify that kind of reliable sources it was learnt and on that presumption the appellant was removed from service, however, the appellant was reinstated into service on 07.05.2024 by the department itself by accepting his revision petition by admitting his stance on removing him from service on presumption basis, but minor punishment of forfeiture of one year approved service has imposed upon the appellant along with treating his intervening period as leave without pay, which is also liable to be to be set aside by modifying the order dated 07.05.2024 to that extent only.

F) That the appellant clearly mentioned in his reply to charge sheet that during preliminary inquiry no proper opportunity of defence was provided to the appellant as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination and the SDPO Cantt took the statement from his under pressure which he denied.

- G) That the appellant denied the allegations leveled against him in his reply to charge sheet but without observing his reply to charge sheet and without conducting proper and regular inquiry, the appellant was removed from service on baseless allegations, however, the appellant was reinstated into service on 07.05.2024 by the department itself by accepting his revision petition by admitting his stance on removing him from service on that baseless allegations, but minor punishment of forfeiture of one year approved service has imposed upon the appellant along with treating his intervening period as leave without pay, which is also liable to be to be set aside by modifying the order dated 07.05.2024 to that extent only.
- H) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that on the acceptance of this amended appeal, the minor punishment of forfeiture of one year approved service of the appellant may kindly be set aside and his intervening period may be treated on full pay by modifying the order dated 07.05.2024 to that extent only with all back and consequential benefits. Any other remedy, which this honorable tribunal deems fit and appropriate that, may also, be awarded in favour of appellant.

Azeem

APPELLANT
Azeem

THROUGH:

Taimur Ali Khan

(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT,

&

Shakir Ullah Torani

(SHAKIR ULLAH TORANI)

ADVOCATE

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

AMENDED SERVICE APPEAL NO. 489/2024

Azeem

VS

Police Department

AFFIDAVIT

I, Azeem, Constable No.5256, Police Lines, Peshawar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

Azeem
DEPONENT



CHARGE SHEET

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1. Whereas I am satisfied that a formal enquiry as contemplated by Efficiency & Disciplinary Rules 1975 is necessary & expedient.
2. And whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule 3 of the aforesaid Rules.
3. Now therefore, as required by Rule 6 (1) of the said Rules, I, Lt Cdr © Kashif Aftab Ahmad Abbasi, PSP, SSP Operations, Peshawar hereby charge you the following police officials under Efficiency & Disciplinary Rule 1975 on the allegations mentioned in the enclosed Summary of Allegations.
 - i. ASI Nazar Gul Khan PS East Cantt
 - ii. Constable Azeem No. 5256 PS East Cantt
 - iii. Constable Noor ul Basar No. 6070
4. And I hereby direct you further under the said Rule to put forth written defence within 7 days of the receipt of this Charge Sheet as to why the proposed action should not be taken against you and also stating at the same time whether you desire to be heard in person.
5. And in case your reply is not received within the specific period, it shall be presumed that you have no defense to offer and ex-parte action will be taken against you.
6. Statement of Allegation is enclosed.

(Lt Cdr © KASHIF AFTAB AHMAD ABBASI)PSP
Senior Superintendent of Police
(Operations) Peshawar

No 286 /PA dated Peshawar the 06/11/2023

Copy of the above is forwarded to the Enquiry Officer for initiating proceeding against the above named officer.

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CHARGE SHEET

1. Whereas I am satisfied that a formal enquiry as contemplated by Efficiency Disciplinary Rules 1975 is necessary & expedient.
2. And whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in rule 3 of the aforesaid Rules.
3. Now therefore, as required by Rule 6 (1) of the said Rules 1, Lt Car Kashif Aftab Ahmad Abbasi, P SP, SSP Operations, Peshawar hereby charge you the following police officials under Efficiency & Disciplinary Rules 1975 on the allegations mentioned in the enclosed Summary of allegations.
 - I. ASI Nazar Gul Khan PS East Cantt
 - II. Constable Azeem No. 5226 PS East Cantt
 - III. Constable Noor Ul Basar No. 6070
4. And I hereby you further under the said Rule to put forth written defence within 7 days of the receipt of this charge Sheet as to why the proposed action should not be taken against you and also stating at the same time whether you desire to be heard in persons.
5. And in case your reply is not received within the specified period, it shall be presumed that you have no defense to offer and ex-parte action will be taken against you.
6. Statement of allegations is enclosed.

(Lt Cdr KASHIF AFTAB AHMAD ABBASI)
Senior Superintendent of Police
(Operations) Peshawar.

No. 286/PA dated Peshawar the 06.11.2023.

Copy of the above is forwarded to the Enquiry Officer for initiating proceeding against the above named officer.

SUMMARY OF ALLEGATIONS

1. Lt Cdr @ Kashif Aftab Ahmad Abbasi, PSP, SSP Operations Peshawar as competent authority is of the opinion that the following police officials have rendered themselves liable to be proceeded against departmentally as they have committed the following acts/omission within the meaning of the Khyber Pakhtunkhwa (E&D) Rules, 1975.

- i. ASI Nazar Gul Khan PS East Cantt
- ii. Constable Azceem No. 5256 PS East Cantt
- iii. Constable Noor ul Basar No. 6070

STATEMENT OF ALLEGATIONS

- A preliminary enquiry conducted by SDPO Cantt vide his office memo No. 2467/PA dated 01.11.2023 that in light of the directions the accused namely Yasir Khan s/o Shakeel Khan r/o Masho Khel Badaber, Peshawar was rearrested by the surveillance team and was confined at Police Station East Cantt.
- It has been learnt through reliable sources that during the confinement period ASI Nazar Gul Khan and Constable Azceem No. 5256 contacted the brother of the accused Yasir and demanded 01 lac Rupees and 02 9-MM Pistols of which after mutual bargaining the brother confined accused handed over two 9MM (local made) pistols to ASI Nazar Gul Khan and Constable Azceem
- Being a part of disciplinary force their this act is highly objectionable and renders them liable for disciplinary proceedings under (E&D) Rules, 1975.

2. For the purpose of scrutinizing the conduct of afore said police official in the said episode with reference to the above allegations ASP Nayab is appointed as Enquiry Officer under Efficiency & Disciplinary Rule 1975.

3. The Enquiry Officer shall in accordance with the provision of the Efficiency & Disciplinary Rules 1975, provide reasonable opportunity of hearing to the accused Official and make recommendations as to punish or other action to be taken against the accused official.

(Lt Cdr @ KASHIF AFTAB AHMAD ABBASI PSP
Senior Superintendent of Police
Operations) Peshawar

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SUMMARY OF ALLEGATIONS

1. Lt Cdr Kashif Aftab Ahmad Abbasi, PSP, SSP Operations Peshawar as competent authority am of the opinion that the following police officials have rendered themselves liable to be proceeding against departmentally as they have committed the following acts/omission with in the meaning of the Khyber Pakhtunkhwa (E&D) Rules , 1975.

- I. ASI Nazar Gul Khan PS East Cantt.
- II. Constable Azeem No 5226 PS East Cantt
- III. Constable Noor Ul Basar No 6070

STATEMENT OF ALLEGATIONS

A Preliminary enquiry conducted by SDPO Cantt vide his office memo No. 2467/PA dated 01.11.2023 that in light of the directions the accused namely Yasir Khan S/o Shakeel Khan r/o Masho Khe! Badaber, Peshawar was rearrested by the Surveillance team and was confined at Police Station East Cantt.

It has been learnt through reliable that during the confinement period ASI Nazar Gul Khan and Constable Azeem No 5226 contacted the brother of the Accused Yasir and demanded 01 lac Rupees and 02 9-MM Pistols of which after mutual bargaining the brother confined accused handed over two 9MM (local made) to ASI Nazar Gul Khan and Constable Azeem.

Being a part of disciplinary force their this act is highly objectionable and render them liable for disciplinary proceedings under (E&D) Rules, 1975.

2. For the purpose of scrutinizing the conduct of the aforesaid police officials in the said episode with reference to the above allegations ASP Nayab is appointed as Enquiry Officer under Efficiency & Disciplinary Rules 1975.
3. The Enquiry Officer shall in accordance with the provision of the Efficiency & Disciplinary Rules 1975, provide reasonable opportunity of hearing to the accused Official and make recommendations as to punish or other action to be taken against the accused Official.

(Lt Cdr KASHIF AFTAB AHMAD ABBASI PSP
Senior Superintendent of Police
Operations) Peshawar)

خدمت جناب نایاب خان ASP حیات آباد پشاور۔

بحوالہ چارج شیٹ نمبر 286/PA تاریخ 06.11.2023

بیت عالی!

مذکورہ بالا چارج شیٹ اشوکا زلوشن کے بابت عرض ہے کہ جملہ الزامات درج در متذکرہ بالا چارج شیٹ میں بردار لی گئی اور خود
ساتھ ساتھ اور ان کا حقیقت سے دور کا تعلق یا واسطہ نہیں ہے۔ یہ کہ یا سر نامی شخص نہ ہم نے گرفتار کیا تھا اور نہ من مسائل نے ان سے کسی قسم کا
غیر قانونی مطالبہ کیا ہے جب ایک بندہ ہمارے ساتھ ملزم نہ ہو تو ان کی رہائی یا ان سے کسی قسم کا غیر قانونی مطالبہ کا سوال ہی پیدا نہیں ہوتا۔
یہ یا سر نہ دہری ہے کہ وجودہ بیان سے پہلے من مسائل سے ایک بیان محترم DSP صاحب نے دہا کے تحت لیا ہے جس نے میں
تعمیراتی کام لگاتار کرتا ہوں کیونکہ انکو آئری آفیسر نے بیان خود تحریر کر کے من مسائل کے سامنے رکھ کر بیانی ہوا کہ اسی طرح بیان اپنے کلم سے اسی
وقت پر کر کے دستخط کرے اور مجھے حوالہ کریں۔

مذکورہ بالا انکو آئری میں لگائے گئے تمام الزامات یکسر مسترد کرتا ہوں۔ جہاں تک دوپستول کا سوال ہے اس نسبت من مسائل نے
اشتیاق نامی شخص سے بات کر کے جس نے دوہر دوپستول لاکر اور میرے سامنے چیک کر کے مجھے حوالہ کیے اور میں نے ان پستولوں کا قیمت
اُسی سے اُس دہا کی ہیں۔ مزید یہ کہ اشتیاق یا سر کا دوست تھا اور بات یا سر تک پہنچ گئی تو یا سر نے مجھے کہا کہ نذر گل خان جانتے ہوں تو میں
نے انہما کہ ہاں تو اُس نے کہا مجھے نذر گل خان ملا دے میں نے نذر گل خان اُس سے ملایا اس لالچ کے خاطر کہ ہمیں صحیح چیز تھوڑا کم
دیتے گا۔ اپنی پستولوں کی ادائیگی چیک کرنے کے بات کی گئی ہے نہ میں نے نہ نذر گل خان نے کسی بھی شخص سے مفت میں پستولی
ہے اور اس نسبت کسی سے غیر قانونی مطالبہ کیا ہے میرا چودہ سالہ پولیس ریکارڈ بالکل صاف و شفاف ہے اور اپنی ڈیوٹی ایمانداری سے کرتا
ہوں جس نے عوام مجھے اچھی سمجھاؤ ملتا ہے جس پر ہمارا گزارا ہوتا ہے۔ تمام الزامات غلط اور بے بنیاد ہے اور اس میں کسی قسم کی صداقت نہیں
ہے لہذا استدعا کہ منظور ہو۔ اب من مسائل کے خلاف انکو آئری چارج شیٹ داخل دفتر فرمانے کا احکامات صادر فرمایا جائے میں عمر بھر دعا
کرتا ہوں۔

آپ کا مخلص
عظیم خان کنشیل بلیٹ نمبر 5256

تھانہ شرقی

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بخدمت جناب نایاب خان ASP، حیات آباد پشاور

بحوالہ چارج شیٹ نمبر PA/286، بتاریخ 06/11/2023

جناب عالی!

مذکورہ بالا چارج شیٹ / شوکاز نوٹس کے بابت عرض ہے کہ جملہ الزامان درج متذکرہ بالا چارج شیٹ مبنی بر دروغ گوئی اور خود ساختہ ہے اور ان کا حقیقت سے دور کا تعلق یا واسطہ نہ ہے۔ یہ کہ یا سر نامی شخص نہ ہم نے گرفتار کیا تھا اور نہ من سائل نے اس سے کسی قسم کا غیر قانونی مطالبہ کیا ہے۔ جب ایک بندہ ہمارے ساتھ ملزم نہ ہو تو ان کی رہائی یا ان سے کسی قسم کا غیر قانونی مطالبہ کا سوال ہی پیدا نہیں ہوتا۔ یہاں یہ امر ضروری ہے کہ موجودہ بیان سے پہلے من سائل سے ایک بیان محترم DSP صاحب نے دباؤ کے تحت لیا ہے جس سے میں لا تعلق کا اظہار کرتا ہوں کہ انکو اڑی افسر نے بیان خود تحریر کر کے من سائل کے سامنے رکھ کر بیانی ہوا کہ اسی طرح بیان اپنے قلم سے اسی وقت تحریر کر کے دستخط کرے اور مجھے حوالہ کریں۔

مذکورہ بالا انکواری میں لگائے گئے تمام الزامات یکسر مسترد کرتا ہوں، جہاں تک دو پستول کا سوال ہے اس نسبت من سائل نے اشتیاق نامی شخص سے بات کر کے جس نے دو عدد پستول لا کر اور میرے سامنے چیک کر کے مجھے حوالہ کئے اور میں نے ان پستولوں کا قیمت اسی سے اس کو ادا کی ہیں۔ مزید یہ کہ اشتیاق یا سر کا دوست تھا اور بات یا سر تک پہنچ گئی تو یا سر نے مجھے کہا کہ نذر گل خان جانتے ہوں تو میں نے جواباً کہا کہ ہاں تو اس نے کہا مجھے نذر گل خان ملاوے میں نے نذر گل خان اسے سے ملایا، اس لالچ کے خاطر کہ ہمیں صحیح چیز تھوڑا کم ریٹ ملے گا۔ باقی پستولوں کی ادائیگی چیک کرنے کے بات کی گئی ہے۔ نہ میں نے نہ نذر گل خان نے کسی بھی شخص سے مفت میں پستول لی ہے اور اس نسبت کسی سے غیر قانونی مطالبہ کیا ہے۔ میرا چودہ سالہ پولیس ریکارڈ بالکل صاف و شفاف ہے اور اپنی ڈیوٹی ایمانداری سے کرتا ہوں، جس کے عوض مجھے اچھی تنخواہ ملتا ہے جس پر ہمارا گزارا ہوتا ہے۔ تمام الزامات غلط اور بے بنیاد ہے اور اس میں کسی قسم کی صداقت نہیں ہے۔ لہذا استدعا ہے بمنظوری جواب ہذا سائل کے خلاف انکواری چارج شیٹ داخل دفتر فرمانے کا احکامات صادر فرمایا جائے۔ میں عمر بھر دعا گو ہوں۔

آپ کا مخلص

عظیم خان، کانسٹیبل بیلٹ نمبر 5256

تھانہ شرقی



11

بیان اڈان اشتیاق دلہ امیر شاہ سکنہ ہال شوہر صاحب

03338497856

1-29-33 (2) 12-73

اس شہر کی ادیت میں بیانا دریا ہوا کہ عظیم صاحب
جو ڈو محمد بیٹو از قلم M.M. صاحب
میں واقعہ میں صورت کی ہے
ایڈیشن میں عظیم اور لہر کے مابین ایک کے طرف
کا قسم کا وہاں کہ ہے گا خود بیان کے طرف

امیر شاہ

اشتیاق دلہ امیر شاہ

Better copy

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بیان آذان اشتیاق ولد آ میر شاہ انگلہ ماشو فیل ماشو بلاہ میر

0333-8997856

17361-12133 29-1

میں اس تحریر کے دو سے ظناً بیان کرتا ہوں کہ عظیم خان کنٹیل
نے جو دو عدد پیشوں آڈ قسم 9MM سے ملی ہے جسکی رقم
میرے سوالے کی ہے۔

لیزا میں کنٹیل عظیم اود فزنگل ASI کے علاقے کسی
قسم کا دعویٰ نہ کرنے کا خود ہوں۔

آ لہر

اشتیاق ولد آ میر شاہ

تعمیرات و تعمیرات
CCPO

تعمیرات و تعمیرات
تعمیرات و تعمیرات
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CCPD صاحب لشیڈار

خدمت جناب

جناب عالی

گزارش منیجر ساٹلان مورفہ 15/12/2023 ریپول آف سروسز

اڈر ہو چکی ہے جسکی انکو اسٹری کاپی مینی حق ہے کہ ساٹلان کو

فائنل انکو اسٹری کے کاپی موصول ہو جائے لہذا اسٹری کاپی ہے

کہ انکو اسٹری فائنل کے فورڈ کاپی دینے کا حکم صادر فرمائے

مشکور ضرورتیں

الفارص

25/12/2023

ASI

سائیل نڈر گل

کسیل منظم 3256

کسیل لورال نصر



E
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ORDER

1. This office order will dispose of formal departmental proceedings against ASI Nazar Gul Khan No. 682/P, Constable Noor-ul-Basar No. 6070, Constable Azeem No. 5256 while posted at Police Station East Cantt was proceeded against departmentally vide this office No. 286/E/PA dated 06.11.2023, on allegations that a preliminary enquiry conducted by SDPO Cantt vide his office memo No. 2467/PA dated 01.11.2023 that in light of the directions the accused namely Yasir Khan s/o Shakeel Khan r/o Masho Khel Badaber, Peshawar was rearrested by the surveillance team and was confined at Police Station East Cantt. It has been learnt through reliable sources that during the confinement period ASI Nazar Gul Khan, Constable Azeem No. 5256 and Constable Noor ul Basar No. 6070 contacted the brother of the accused Yasir and demanded 01 lac Rupees and 02 9-MM Pistols of which after mutual bargaining the brother confined accused handed over two 9MM (local made) pistols to ASI Nazar Gul Khan and Constable Azeem.
2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation were issued against them and ASP Hayatabad was appointed as Enquiry Officer, who submitted his finding, wherein he concluded that the allegations against delinquent officials have been proved and they stand guilty of the charges and agree with the preliminary enquiry. The E.O further recommended them for major punishment.
3. Having gone through the enquiry file and other relevant record, the undersigned is fully satisfied that the delinquent officials have committed a gross misconduct, which is proved beyond any shadow of doubt. Thus, they brought bad name to the police department. The undersigned being a competent authority do agree with the recommendations of the enquiry officer, therefore, ASI Nazar Gul Khan No. 682/P, Constable Noor-ul-Basar No. 6070, Constable Azeem No. 5256 are hereby awarded major punishment of "Removal from Service" with immediate effect.

(Lt Cdr @ KASHIF AFTAB AHMAD ABBAS)PSP
Senior Superintendent of Police
(Operations) Peshawar

No. 2106-11 PA dated Peshawar, the 15/12 2023.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. SsP Cantt & HQrs, CCP Peshawar.
3. SDPO Cantt, CCP Peshawar.
4. EC-II/OASI/CRC/PO, FMC along with complete enquiry file for record (58).
5. Officials concerned.

4. Video footage was examined, showing that police officials visited an Arms Company in civilian clothing, but no illegal exchange or transaction was observed. (USB attached; also on lock-up duty. (Written statement)
5. The accused party admits in their written statements that they received (attached).

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جناب چیف کیپٹل سٹی پولیس آفیسر پشاور

عنوان :- اپیل بمراد بحالی ملازمت ایپلانٹ بمعہ مراعات ضبط شدہ

جناب عالی :- ایپلانٹ حسب ذیل عرض رساں ہے۔

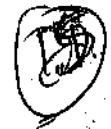
1- یہ کہ ایپلانٹ ایک شریف اور باعزت خاندان سے تعلق رکھتا ہے اور قانون کی پاسداری کرنے والا شہری ہے اور ضلع نوشہرہ کارہائشی و پیدائشی باشندہ ہے۔

2- یہ کہ ایپلانٹ محکمہ پولیس میں بحیثیت کنسٹیبل بمطابق نمبر 15256 اپنی خدمات خوش اسلوبی سے سرانجام دے رہا تھا اور کبھی بھی افسران بالا شکایت کا موقع نہیں دیا نیز سائل نے پہلے کسی بھی تھانہ میں جنرل ڈیوٹی سرانجام نہیں دی ہے چونکہ تھانہ شرقی سائل کی پہلی جنرل ڈیوٹی تھانہ ہے اور اس سے قبل بطور گنر افسران اور ایف آر پی ہیڈ کوارٹر تعینات رہ چکا ہے اور محرر سٹاف نے جملہ ملازمان کیساتھ ڈیوٹی بیرک کنسٹیبلان بمعہ ایپلانٹ کی ڈیوٹی لگائی تھی اور کوئی ہدایات وغیرہ نہیں دیے گئے تھے کہ ملازمان کس جرم میں گرفتار ہیں۔

3- یہ کہ یہاں پر اس امر کی وضاحت کرنا ضروری ہے ملازم کی رہائی کو ایپلانٹ کو مورد الزام ٹھہرایا گیا ہے حالانکہ ایپلانٹ/تھانہ شرقی پولیس ملازم مذکورہ کو تھانہ بڈھ میر پولیس پشاور کو بحفاظت حوالہ کیا تھا مگر نہ جانے کس بناء پر تھانہ بڈھ میر نے ملازم یا سر کورہا کیا یا کسی جرم میں چالان کیا ہے ایپلانٹ کو اس کے متعلق کوئی علم نہ ہے لیکن جناب ڈی ایس پی صاحب کینٹ نے اس سلسلے میں ایپلانٹ کو مورخہ 31-10-2023 کو بوقت 22:00 بجے مد نمبر 37 روزنامہ پولیس لائن کوارٹر گارڈ میں بند کیا گیا تھا اور مد نمبر 59 مورخہ 02-11-2023 بوقت 20:10 بجے کوارٹر گارڈ سے بمطابق روزنامہ پولیس لائن رہا کیا۔ (جملہ نقولات مد میں جو غیر حاضری کا ذکر کیا گیا ہے وہ ایپلانٹ کی تھانہ شرقی میں کوئی غیر حاضری درج نہ ہے یہ کوارٹر گارڈ کی سزا اس فعل کی دی گئی ہے۔

4- یہ کہ ملازم مذکورہ کی رہائی متعلق ایپلانٹ کو چارج شیٹ کیا گیا اور انکو آئری آفیسر نے ایپلانٹ کی انکو آئری حقیقت اور شواہد/بیانات کے خلاف مرتب کر کے ایپلانٹ کو غیر قانونی طور پر بلا جواز نوکری سے بمطابق چٹھی نمبر 11-2105-PA مورخہ 15-12-2023 (Removal from Service) کر دیا گیا۔ (جملہ دستاویزات لف اپیل ہذا

(ہیں)



5- یہ کہ ایپلانٹ ایک غریب بندہ ہے اور ایپلانٹ اپنے گھرانے کا واحد طور پر کفیل ہے اور ایپلانٹ کا گزر بسر بمشکل ہو رہا ہے اور آمدنی کا دیگر کوئی ذریعہ نہ ہے نیز ایپلانٹ کے 04 چھوٹے چھوٹے بچے ہیں جن کی کفالت سائل کے کندھوں پر ہے۔

6- یہ کہ اس نا امیدی کے حالت میں آپ جناب سے انصاف کی توقع رکھتے ہوئے اور ایپلانٹ کے چھوٹے چھوٹے بچوں کے خاطر ایپلانٹ کو اپنی ملازمت پر بمعہ واجبات بحالی کا حکم صادر فرمائیں سائل اس کے لیے عمر بھر دعا گو رہے گا۔

لہذا استدعا ہے کہ بمنظوری اپیل ہذا ایپلانٹ کو اپنی ملازمت پر بحالی اور عطائگی مراعات کے احکامات جاری فرمائیں اس امر کے لیے ایپلانٹ دعا گو رہے گا۔

الرقوم:- 22-12-2023

ارض

ایپلانٹ:-

کنسٹبل عظیم نمبر 5256

قومی شناختی کارڈ نمبر 3-4038604-17201

رابطہ نمبر 0314-9822769



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

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

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Azeem Khan No. 5256, who was awarded the major punishment of "dismissal from service" under KP PR-1975 (amended 2014) by SSP/Operations, Peshawar vide order No. 2106-11/PA, dated 15.12.2023.

2- Brief facts leading to the instant appeal are that the defaulter Constable was proceeded against departmentally on the charges that in light of the directions, the accused namely Yasir Khan s/o Shakeel r/o Masho Khel Badaber, Peshawar was arrested by the surveillance team and was confined at PS East Cantt: till further orders. During the confinement period, the defaulter Constable contacted brother of the accused namely Yasir and demanded 01 Lac Rupees and two 09-MM (Local made) Pistols. After mutual bargaining, brother of the accused i.e. Yasir, handed over two 09-MM (Local made) Pistols to ASI Nazar Gul and Constable Azeem.

3- He was issued Charge Sheet and Summary of Allegations by SSP/Operations, Peshawar. ASP/Hayatabad, Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which he was recommended for major punishment. The competent authority in light of the findings of the Enquiry Officer awarded him the major punishment of dismissal from service.

4- He was heard in person in Orderly Room. During personal hearing, he was given an opportunity to prove his innocence. However, he failed to submit any plausible explanation in his defense. Therefore, his appeal for setting aside the punishment awarded to him by SSP/Operations, Peshawar vide order No. 2106-11/PA, dated 15.12.2023, is hereby rejected/filed.

"Order is announced"

CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 1021-88 /PA/CCP, dated Peshawar the 03 / 03/2024

Copies for information and necessary action to the:-

1. SSP/Operations Peshawar.
2. SP/HQrs, Peshawar.
3. AD/IT CCP Peshawar.
4. EC-II, AS & Pay Officer.
5. FMC along with complete Fouji Missal.
6. Official concerned.

بخدمت جناب انسپکٹر جنرل آف پولیس آفیسر خیبر پختونخوا

عنوان:- درخواست برآمد بھالی ملازمت سائل بمعدہ مراتب ضابطہ

جناب عالی:- سائل حسب ذیل عرض رسال ہے۔

1- یہ کہ سائل ایک شریف اور باعزت خاندان سے تعلق رکھتا ہے اور قانون کی پاسداری کرنے والا شہری ہے اور شائع لوشہرہ کارہائشی و پیدائشی باشندہ ہے۔

2- یہ کہ سائل محکمہ پولیس میں بحیثیت کنسٹیبل بمطابق نمبر 15256 اپنی خدمات خوش اسلوبی سے سرانجام دے رہا تھا اور کبھی بھی انسران بالا شکایت کا موقع نہیں دیا نیز سائل نے پہلے کسی بھی تھانہ میں جنرل ڈیوٹی سرانجام نہیں دی ہے چونکہ تھانہ شرقی سائل کی پہلی جنرل ڈیوٹی تھانہ ہے اور اس سے قبل بطور گنر انسران اور ایف آر پی ہیڈ کوارٹر تعینات رہ چکا ہے اور محرر سائل نے جملہ مہمان کیساتھ ڈیوٹی بیک کنسٹیبلان بمعدہ سائل کی ڈیوٹی لگائی تھی اور کوئی ہدایات وغیرہ نہیں دیے گئے تھے کہ مہمان کس جرم میں گرفتار ہیں۔

3- یہ کہ یہاں پر اس امر کی وضاحت کرنا ضروری ہے مہتمم کی رہائی کو سائل کو مورد الزام ٹھہرایا گیا ہے حالانکہ سائل / تھانہ شرقی پولیس مہتمم کو تھانہ بڈہ پیر پولیس پٹا اور کو بحفاظت حوالہ کیا تھا مگر نہ جانے کس بنا پر تھانہ بڈہ پیر نے مہتمم یا سرگورہ ہاکیا کسی جرم میں چالان کیا ہے سائل کو اس کے متعلق کوئی علم نہ ہے لیکن جناب ڈی ایس پی صاحب کینٹ نے اس سلسلے میں سائل کو مورخہ 31-10-2023 کو بوقت 22:00 بجے نمبر 37 روزنامہ پچ پولیس لائن کوارٹر کارڈ میں بند کیا گیا تھا اور نمبر 59 مورخہ 02-11-2023 بوقت 20:10 بجے کوارٹر کارڈ سے بمطابق روزنامہ پچ پولیس لائن رہا کیا۔ (جملہ فتوحات مد میں جو غیر حاضری کا ذکر کیا گیا ہے وہ سائل کی تھانہ شرقی میں کوئی غیر حاضری اور نہ ہے یہ کوارٹر کارڈ کی سزا اس فعل کی دی گئی ہے۔

4- یہ کہ مہتمم مذکورہ کی رہائی متعلق سائل کو چارج شیٹ کیا گیا اور انکوائری آفیسر نے سائل کی انکوائری حقیقت اور شواہد/بیانات کے خلاف مرتب کر کے سائل کو غیر قانونی طور پر بلا جواز نوکری سے بمطابق جنسی نمبر 2105-11 PA مورخہ 15-12-2023 (Removal from Service) کر دیا گیا۔ (جملہ دستاویزات لف اول ہذا

ہیں)

5- یہ کہ مسائل کے خلاف ایک انکوائری تشکیل دی گئی جس میں باقاعدہ طور پر ایک انکوائری آفیسر منتخب کیا جس میں متعلقہ انکوائری آفیسر نے مسائل کو گناہ کار قرار دیا گیا جس کی بنا پر مسائل کو ہی سی پی او آفس بمطابق چٹھی نمبر 1081-88/PA/CCP مورخہ 05-03-2024 نوکری سے برناست کیا گیا۔ (نقل حکم نامہ مورخہ 05-03-2024 الف درخواست ہے)۔

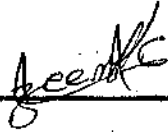
5- یہ کہ مسائل ایک غریب بندہ ہے اور مسائل اپنے گھرانے کا واحد طور پر کھینچے ہوئے ہیں اور مسائل کا گزر بسر مشکل اور ہا ہے اور آمدنی کا وہ گھر کوئی ذریعہ ہے نیز مسائل کے 04 چھوٹے چھوٹے بچے ہیں جن کی کفالت مسائل کے کندھوں پر ہے۔

6- یہ کہ اس ناامیدی کے حالت میں آپ جناب سے انصاف کی توقع رکھتے ہوئے اور مسائل کے چھوٹے چھوٹے بچوں کے خاطر مسائل کو اپنی ملازمت پر بہت وابہات بحالی کا حکم صادر فرمائیں مسائل اس کے لیے عمر بھر دعا گو رہتے ہیں۔

لہذا استدعا ہے کہ منظور کی اپیل ہذا مسائل کو اپنی ملازمت پر بحالی اور عطا ہوگی
مراعات کے احکامات جاری فرمائیں اس امر کے لیے مسائل دعا گو رہیں گے۔

المترقوم:- 08-03-2024

ارض



مسائل

کنستابل تنظیم نمبر 5256

قومی شناختی کارڈ نمبر 3-4038604-17201

رابطہ نمبر 0314-9822769

4

INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA PESHAWAR
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

19

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11 A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-ASI Nazir Gul No. 682/P (hereinafter referred to as petitioner)

SSI Operations, Peshawar awarded the petitioner major punishment of dismissal from service vide order In DM No. 2106-11/PA, dated 15.12.2023 on the allegations that an accused named Asim Khan s/o Shakeel r/o Masho Khel Balaher was arrested by the surveillance team and was confined in the last cell at all further orders. During the confinement period, the defaulting ASI contacted the brother of the accused namely Yasir and demanded 01 Linc Rupeet and two 09-MM (Local made) pistols. All the material bargained, brother of the accused i.e. Yasir, handed over two 09-MM (Local made) pistols to ASI Nazir Gul and Constable Azem

The Appellate Authority i.e. CCO/Peshawar heard the appellant in OR & rejected the appeal vide order In DM No. 387-93/PA/CCP, dated 30.01.2024

A meeting of Appellate Board was held on 10.05.2024 at CPO under the chairmanship of DIG, Headquarters. Ex-ASI Nazir Gul No. 682 was present.

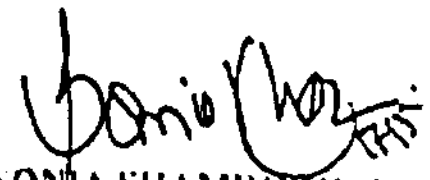
The petitioner was heard in person. The Board accepted his revision petition. He is reinstated into service with immediate effect. His major punishment of dismissal from service is converted into major punishment of Reversion in Rank i.e. from his substantive rank of ASI to HC. He is to be treated as leave without pay

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

No. SI 1180-25 /24, dated Peshawar, the 17-05-2024.

Copy of the above is forwarded to the.

1. Capital City Police Officer, Peshawar. One Service Book, One Service Roll, One Leave Slip and Original Enquiry File (207 pages) received vide letter No. 3185/FC-II, dated 23.02.2024 returned for your office record.
2. Senior Superintendent of Police, Operations, Peshawar
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar
4. PA to Addl: IG/HQrs Khyber Pakhtunkhwa, Peshawar,
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-III, CPO Peshawar.


ISONIA SHAMROZE KHAN
PSP
AIG-1, Peshawar

Better Copy

19

OFFICE OF THE INSPECTOR
GENERAL KHYBER PAKHTUNKHWA
PESHAWAR

ORDER

This order is hereby passed to dispose off Revision Petition Under Rule 1975 amended 2014 submitted by Ex-ASI Nazar Gul No. 682/P (hereinafter referred to as petitioner).

SSP/Operations, Peshawar awarded the petitioner major punishment of dismissal from service vide order Endst No. 2106-11/PA, dated 15.02.2023 on the allegations that an accused namely Yasir Khan S/o Shakil r/o Masho Khel Badaber was arrested by the Surveillance team and was confined at PS East Cantt till further orders. During the confinement period, the Defaulter ASI contacted the Brother of the accused namely Yasir and demanded 01 Lac Rupees and to 9MM local Made pistol. After mutual bargaining brother of the accused i.e Yasir handed 9MM local Made pistol to ASI Nazar Gul and Constable Azeem.

The appellate authority i.e CCP/Peshawar head the appellant in OR and rejected this appeal vide order Endst No. 387/93/CCP, dated 30.01.2024.

A meeting of Appellate Board was held on 10.05.2024 in CPO under the Chairmanship of DIG Headquarters, EX-ASI Nazal Gul No. 682 was present.

The Petitioner was heard in person. The Board accepted his Revision Petition. He is reinstated into service with immediate effect. His major punishment of dismissal from service in converted into major Punishment of Reversion in rank of SI i.e from his substantive rank of ASI to HC. The intervening period to be treated as leave without pay.

AWAL KHAN, DSP
Additional Inspector
General Khyber Pakhtunkhwa
Peshawar

No. S/1180-85 /24

Dated Peshawar the 17.05.2024

Copy of the above is forwarded to the

1. Capital City Police Officer, Peshawar On Service Book, One Service Roll, one Fauji Misal and Original Enquiry File (209 pages) received vide letter No 3185/EXC-II, dated 23.02.2024 in returned for your office record.
2. Senior Superintendent of Police, Operations, Peshawar.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl IGP//HQrs Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt E-III, CPO Peshawar.

(SOMA SHAMROZE KHAN)
PSP
AIG/Establishment

J (20)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 489/2024

Azeem Ex-Constable No.5256.
Police Station East Cantt. Peshawar.

(APPELLANT)

VERSUS

1. The Capital City Police Officer, Peshawar.
2. The Senior Superintendent of Police, (Operation) Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974
AGAINST THE ORDER DATED 15.12.2023, WHEREBY
MAJOR PUNISHMENT OF REMOVAL FROM
SERVICE WAS IMPOSED UPON THE APPELLANT
AND AGAINST THE ORDER DATED 05.03.2024,
WHEREBY THE DEPARTMENTAL APPEAL OF THE
APPELLANT WAS REJECTED FOR NO GOOD
GROUNDS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE
ORDER DATED 15.12.2023 AND 05.03.2024 MAY
KINDLY BE SET ASIDE AND THE APPELLANT MAY
BE REINSTATED INTO HIS SERVICE WITH ALL
BACK AND CONSEQUENTIAL BENEFITS. ANY
OTHER REMEDY, WHICH THIS HONORABLE
TRIBUNAL DEEMS FIT AND APPROPRIATE THAT,
MAY ALSO, BE AWARDED IN FAVOUR OF
APPELLANT.

ATTESTED

SECRETARY
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

03-6-24

A. No. 489/2024
Azam vs Govt

(21)

16th May, 2024

01. Learned counsel for the appellant present. Mr. Arshad Azam,
Assistant Advocate General for the respondents present.

02. Learned counsel for the appellant submitted copy of order dated
07.05.2024 passed on revision petition of the appellant whereby the
Revision Board has converted the major penalty of dismissal/removal
from service into minor penalty of forfeiture of one year approved
service and reinstated him into service with immediate effect. Learned
counsel for the appellant wants to challenge the said order and
requested for permission to file amended service appeal. Request is
allowed. He may do so within a week. To come up for amended memo
of appeal on 05.06.2024 before S.B. P.P given to the parties.

ATTESTED
3-6-24
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(Muhammad Akbar Khan)
Member (E)

Kunzumiloh

Date of Presentation of Application 07.6.24
Number of Writs 2-P
Copies 5/1
Urgent
Total 151 -
Name of
Date of Court
Date of Delivery of Copy 07.6.24

VAKALAT NAMA

NO. _____/2024

IN THE COURT OF Khyber Pakhtunkhwa Service Tribunal Peshawar

Azeem (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Deptt (Respondent)
(Defendant)

I/We, Azeem

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT AND SHAKIR ULLAH TORANI ADVOCATE**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

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

Dated _____/2024

Azeem
(CLIENT)

ACCEPTED

Taimur Ali Khan
TAIMUR ALI KHAN,
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916

& Shakir Ullah Torani
SHAKIR ULLAH TORANI
Advocate Peshawar
BC-22-4994
03409146056