

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

**AMENDED SERVICE APPEAL NO.590/2024**

Mohabat

VS


Police Department

-----  
**INDEX**  
-----

S.No.	Documents	Annexure	P. No.
1	Memo of Appeal	-----	01-07
2	Affidavit	-----	08
3	Copy of FIRs	A	09-10
4	Copies of report dated 29.12.2023 and order dated 29.12.2023	B&C	11-12
5	Copies of departmental appeal and rejection order dated 20.03.2024	D&E	13-18
	Copies of revision petition and order dated 05.07.2024	F&G	19-21
	Copies of application and order sheet dated 20.08.2024	H&I	22-25
6	Vakalat Nama	----	26

THROUGH:

**APPELLANT**

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

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**AMENDED SERVICE APPEAL NO.590/2024**

Mohabat Constable No.6584,  
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 05.07.2024,  
WHEREBY THE REVISION PETITION OF THE  
APPELLANT WAS ACCEPTED BY MODIFYING HIS  
MAJOR PUNISHMENT OF DISMISSAL FROM  
SERVICE INTO MINOR PUNISHMENT OF STOPPAGE  
OF ONE INCREMENT WITHOUT CUMULATIVE  
EFFECT AND 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, MINOR PUNISHMENT OF STOPPAGE OF  
ONE INCREMENT WITHOUT CUMULATIVE EFFECT  
IMPOSED UPON THE APPELLANT MAY KINDLY BE  
SET ASIDE AND STOPPED ONE INCREMENT OF THE  
APPELLANT MAY PLEASE BE RESTORED AND  
REINSTATE HIM INTO SERVICE WITH EFFECT  
FROM 29.12.2023 I.E FROM THE DATE OF DISMISSAL  
AND HIS INTERVENING PERIOD MAY ALSO BE  
TREATED ON FULL PAY BY MODIFYING THE  
ORDER DATED 05.07.2024 TO THAT EXTENT WITH  
ALL BACK AND CONSEQUENTIAL BENEFITS. ANY  
OTHER REMEDY, WHICH THIS HONORABLE**

2

**TRIBUNAL DEEMS FIT AND APPROPRIATE THAT,  
MAY ALSO, BE AWARDED IN FAVOUR OF  
APPELLANT.**

---

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was appointed as Constable the year 2014 and completed all his due trainings. The appellant since his appointment the appellant is performing his duty with devotion and honesty whatsoever assigned to him and no complaint has been filed against him regarding his performance.
2. That the appellant was posted in Police Post Science College Police Station Yakathoot. The appellant along with IHC Zeeshan Khan, who was in-charge of the Police Post was on routine gasht on ring road has stopped Suzuki pick up and put down two suspected persons from the Suzuki and on their search narcotics were recovered from them and they disclosed their name as Gul Nazar and Mustaqim. The IHC Zeeshan Khan informed SHO of concerned Police Station Yakathoot about the matter on which the SHO directed the IHC Zeeshan Khan to trace the main dealer with the help of that arrested persons.
3. That on the direction of SHO, IHC Zeeshan Khan asked from the accused about the dealer who provide them narcotics for distribution on which Gul Nazar told IHC Zeeshan Khan that a person namely Gul g provide them narcotics for distribution on which the appellant took mobile from Gul Nazar and contacted Gul g through his mobile in order to persuaded him to come to the spot so that they trap him and arrest him as per direction of his SHO on which he wanted some bargain on the release of the accused, however, IHC Zeeshan Khan told the appellant to insist Gul g to come to the spot on ring road so that they also arrest him, however, Gul g told him that he is not present and his partner will come to the spot near at KDF Restaurant on ring road and the IHC Zeeshan Khan also contacted with his informer (Younas) to come to the spot near KDF Restaurant on ring road to help them to trap and arrest of partner of Gul g on which the informer (Younas) came to the spot and as per direction of the IHC Zeeshan Khan informer (Younas) was waiting for the partner of Gul g at the spot near KDF Restaurant on ring road and the appellant along with IHC Zeeshan Khan were waiting on the other side of the road and in meanwhile the police team comprised of SDPO Pishtakhara

3

and SHO Sarband along with other Police Officials came to the spot and arrested informer Younas on which IHC Zeeshan Khan came near to the police team and told them that the person you arrested is his informer and told them that he has contacted with his SHO about the arrest of accused Gul Nazar and Mustaqim and on his direction to trap the main dealer who provided narcotics to Gul Nazar and Mustaqim he has done the whole process and told them the whole story and that moment IHC Zeeshan also contacted with his SHO of concerned Police Station Yakathoot and told him about the occurrence on which the SHO told the IHC Zeeshan that he is present with the DSP Subrab and tell him on which DSP Subrub also contacted SDPO Pishtakhara through his mobile phone and told him about the reality of the issue. It is pertinent to mention here that properly FIRs were also lodged against the accused namely Mustaqim and Gul Nazar. **(Copies of FIRs are attached as Annexure-A)**

4. That SP City Division CCP; Peshawar submitted report on 29.12.2023 to the SSP Operation, Peshawar about the incident and recommended for proper departmental proceeding against the appellant, but without conducting any inquiry against the appellant, he was dismissed from service on the same day of submission of report i.e 29.12.2023 vide order dated 29.12.2023. **(Copies of report dated 29.12.2023 and order dated 29.12.2023 are attached as Annexure-B&C)**
5. That the appellant filed departmental appeal on 19.01.2024 against the dismissal order dated 29.12.2023, which was rejected on 20.03.2024 for no good ground. **(Copies of departmental appeal and rejection order dated 20.03.2024 are attached as Annexure-D&E)**
6. That the appellant then filed the service appeal in this Honorable Tribunal in which he impugned the orders dated 29.12.2023 and dated 20.03.2024 and also filed revision petition under 11-A of Police Rules 1975 (amended in 2014) before respondent No.1 and during the proceeding of the service appeal of the appellant, the respondent No.1 passed an order dated 05.07.2024, whereby revision petition of the appellant was accepted by modifying the major punishment of dismissal from service into minor punishment of stoppage of one increment without cumulative effect and was reinstated into service with immediate effect and his intervening period was treated as leave without pay. **(Copies of revision petition and order dated 05.07.2024 are attached as Annexure-F&G)**

7. That as the appellant has filed the service appeal in this Honorable Tribunal against the order dated 29.12.2023, whereby the appellant was dismissed from service and against the order dated 20.03.2024 whereby the departmental appeal of the appellant was rejected with the prayer to set aside the orders dated 29.12.2023 and 20.03.2024 and reinstate the him into his service with all back and consequential benefits, however, the revision petition of the appellant was accepted by respondent No.1 on 05.07.2024 in which he was reinstated into service with immediate effect instead of 29.12.2023 by the respondent department itself, but his major punishment of dismissal from service was modified into minor punishment of stoppage of one increment without cumulative effect 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 05.07.2024, but imposed minor punishment of stoppage of one increment without cumulative effect and his intervening period was treated as leave without pay in that order, therefore, the appellant filed an application in this Honorable Tribunal for permission to seek amendment in his service appeal due to the passing of order dated 05.07.2024, which was allowed by this Honorable Tribunal on 20.08.2024. (Copies of application and order sheet dated 20.08.2024 are attached as Annexure-H&I)
8. That the appellant wants to file the amended appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

**GROUND:**

- A) That imposition of minor punishment of stoppage of one increment without cumulative effect upon the appellant and his intervening period was treated as leave without pay in the order dated 05.07.2024 is against the law, rules, 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 stoppage of one increment without cumulative effect imposed upon the appellant and his intervening period was treated as leave without pay.
- B) That baseless allegation was leveled against the appellant on which the appellant was dismissed from service without conducting inquiry to dig out the realty about the allegation leveled against the appellant,

5

but the appellant was reinstated into service on 05.07.2024 by the department itself by accepting his revision, which means that the stance of the appellant was accepted by the department itself by dismissing him from service on baseless allegation, but minor punishment of stoppage of one increment without cumulative effect has imposed upon the appellant and his intervening period was treated as leave without pay in the order dated 05.07.2024, which is liable to be modified to the extent of setting aside the imposition of minor punishment of stoppage of one increment without cumulative effect imposed upon the appellant and his intervening period was treated as leave without pay.

- C) That when IHC Zeeshan Khan Incharge Police Post and appellant has arrested two persons due to recovery of narcotics from them, IHC Zeeshan Khan has properly informed his SHO of the concerned Police Station Yakathoot about the matter on which the SHO directed the IHC Zeeshan Khan to trace the main dealer with the help of that arrested persons and on the direction of SHO, the IHC Zeeshan Khan asked from the accused about the dealer who provide them narcotics for distribution on which Gul Nazar told the IHC Zeeshan Khan that a person namely Gul g is the dealer who provide them narcotics for distribution, on which appellant took mobile from Gul Nazar and contacted Gul g through his mobile in order to persuaded Gul g to come to the spot so that they trap him and arrest him as per direction of his SHO and told Gul g about the arrest of Gul Nazar and Mustaqim on which he wanted some bargain for release of accused, however, IHC Zeeshan Khan told the appellant to insist Gul g to come to the spot on ring road so that they also arrest him, however, Gul g told the appellant that he is not present and his partner will come to the spot near at KDF Restaurant on ring road and IHC Zeeshan Khan also contacted with his informer (Younas) to come to the spot near KDF Restaurant on ring road to help them to trap and arrest of partner of Gul g on which the informer (Younas) came to the spot and as per direction of IHC Zeeshan Khan informer (Younas) was waiting for the partner of Gul g at the spot near KDF Restaurant on ring road and the appellant along with IHC Zeeshan Khan were waiting on the other side of the road and in meanwhile the police team comprised of SDPO Pishtakhara and SHO Sarband along with other Police Officials came to the spot and arrest informer Younas on which the appellant along with IHC Zeeshan Khan came near to the police team and IHC Zeeshan Khan told them that the person you arrested is his informer and told them that he has contacted with his SHO about the arrest of

accused Gul Nazar and Mustaqim and on his direction to trap the main dealer who provided narcotics to accused Gul Nazar and Mustaqim for distribution he has done the whole process and told them the whole story, which means that the appellant did not commit any misconduct and all has done on the direction of his SHO to trap main dealer who distributed the narcotics, but despite that high ups of the appellant connected the matter with appellant and was dismissed him from service on baseless allegation, but the appellant was reinstated into service on 05.07.2024 by the department itself by accepting his revision, which means that the stance of the appellant was accepted by the department itself by dismissing him from service on baseless allegation, but minor punishment of stoppage of one increment without cumulative effect has imposed upon the appellant and his intervening period was treated as leave without pay in the order dated 05.07.2024, which is liable to be modified to the extent of setting aside the imposition of minor punishment of stoppage of one increment without cumulative effect imposed upon the appellant and his intervening period was treated as leave without pay.

- D) That in the impugned order dated 05.07.2024, the department admit the stance of the appellant that the concerned SHO directed to arrest the main drug dealer and his revision was accepted by reinstating him into his service and when the department admitted the stance of the appellant then imposition of minor punishment of stoppage of one increment without cumulative effect upon the appellant and treating his intervening period as leave without pay is against the norms of justice and fair play.
- E) That in the dismissal order dated 29.12.2023 of the appellant, it is mention that the IHC Zeeshan Khan along with the appellant have not informed his any senior officer, but IHC Zeeshan Khan has properly informed his SHO of Police Station Yakathoot about the matter and in the impugned order dated 05.07.2024, the department admit the stance of the appellant that the concerned SHO directed to arrest the main drug dealer and his revision was accepted by reinstating him into his service and when the department admitted the stance of the appellant, then his dismissal from service on 29.12.2023 and now imposition of minor punishment of stoppage of one increment without cumulative effect upon the appellant and treating his intervening period as leave without pay on baseless allegation is against the norms of justice and fair play.

- F) That the appellant told the police team on the spot as well as during personal hearing that IHC Zeeshan Khan who was the incharge of the Police post has timely informed his SHO about the matter and on the direction of the SHO he has done all the process in order to trap and arrest the main dealer of narcotics, but despite that the appellant was dismissed from service on 29.12.2023, however, the department admit the stance of the appellant in the order dated 05.07.2024 that the concerned SHO directed to arrest the main drug dealer, which means that the appellant did not commit any misconduct and has been punished for no fault on his part by first dismissed from service in order dated 29.12.2023 and now imposition of minor punishment of stoppage of one increment without cumulative effect and treating his intervening period as leave without pay in the order dated 05.07.2024.
- G) 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, minor punishment of stoppage of one increment without cumulative effect imposed upon the appellant may kindly be set aside and stopped one increment of the appellant may please be restored and reinstate him into service with effect from 29.12.2023 i.e from the date of dismissal and his intervening period may also be treated on full pay by modifying the order dated 05.07.2024 to that extent 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.

  
APPELLANT

Mohabat

THROUGH:

  
(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT

&

  
(SHAKIR ULLAH TORANI)

ADVOCATE



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

**AMENDED SERVICE APPEAL NO.590/2024**

Mohabat

V/S

Police Department

**AFFIDAVIT**

I, Mohabat Constable No.6584, 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

  
**DEPONENT**

29-12-2023  
ASI Mazhar Sher

ASSTANT COMMISSIONER  
Mazhar Sher : 4887 : (15/12/2023)  
AMTS-12/28/2023-2391 : 2391/23 : 28-12-2023 11:40 PM : 0319288169

1	AMTS-12/28/2023-2391	29-12-2023 12:35AM	6	0319288169	0319288169
2	AMTS-12/28/2023-2391	29-12-2023 12:35AM	6	0319288169	0319288169
3	AMTS-12/28/2023-2391	29-12-2023 12:35AM	6	0319288169	0319288169
4	AMTS-12/28/2023-2391	29-12-2023 12:35AM	6	0319288169	0319288169
5	AMTS-12/28/2023-2391	29-12-2023 12:35AM	6	0319288169	0319288169

28-12-2023 11:40 PM : 0319288169 : AMTS-12/28/2023-2391 : 2391/23 : 28-12-2023 11:40 PM : 0319288169

AMTS-12/28/2023-2391 : 2391/23 : 28-12-2023 11:40 PM : 0319288169



AMTS-12/28/2023-2391 : 2391/23 : 28-12-2023 11:40 PM : 0319288169

10

9



سرینل نمبر: 005013

سلازم نمبر: 24 (1)

اعتمادی اطلاع دہرٹ نسبت م قابل دست اندازی م لیس دہرٹ شدہ بر وقت 154 مجموعہ ضابطہ نوچداری

نمبر: 23/23/2392/23 تمام: آف میر جانی شاہ خلیج: پٹاور ای بک نمبر: AMI-12/28/2023-2392

تاریخ وقت وقوع: 29-12-2023 12:10 AM

1	تاریخ وقت دہرٹ	44 دہرٹ نمبر (29) 29-12-2023 01:05 AM	6 تمام سے روانگی کی تاریخ وقت	بہر کٹا نام
2	نام و سکونت اطلاع دہرٹ مستثنیت	حیدر خان ASI چوہانہ آف سر جانی شاہ مجموعہ چوہانہ آف نام جانی شاہ پشیمہ لیس آف فون نمبر: 03219067113		
3	مقرر کیفیت جرم (معدودہ) اصل اگر کچھ کو کیا ہے	بھرم:		
		9D-CIT		
4	جائے وقوع و واسطہ تمام سے اور دست	تدووعہ سائیس کا ڈوڈ		
5	کارروائی حلقہ تفتیش اگر اطلاع دہرٹ کرنے میں کچھ توقف ہو تو اس کی وجہ بیان کی جائے	پیدگی تحریری مراسلہ پر مقدمہ درج و جرم کیا گیا۔		

دستخط: Mazhar Sher پلاٹ نمبر: 4887 مہرہ: ASI فون نمبر: 03134288169

(اعتمادی اطلاع پر درج کریں)

بوقت مدد سے ایک تحریری مراسلہ جناب حیدر خان ASI سے دست کٹیش مہرہ الدین 837 موصول ہو کر عدالت میں بختم مہرہ انوار صاحب تمام  
AMIS مہرہ کنسیلیان مہرہ الدین 837 ساہد 5614 کے سلسلہ موبائل کے تمام جائے وقوعہ بالا پر موجود تھا کہ ایک جہان المہرہ فہم پیدگی آف نام اکثر  
کے دریافت اپنا نام گل نظر ولد گلاب سنگھ تیرا اطلاع دہرٹ کے دائرہ تفتیش ایک دہرٹ شاہ برنگ سز لیا جا کر چیک کرنے پر شاہ سے ایک بکت مہرہ کنسیلیان  
سلسلہ میں لپٹی ہوئی رہ آئے ہو کر موقع پذیر پیدگی کنسیلیان مہرہ کنسیلیان کوئی پر 103 گرام آف جس میں سے 01 گرام مہرہ کنسیلیان کے لئے مہرہ کنسیلیان  
بندہ پارسل نمبر 01 میں اور پیکٹ دہرٹ 1029 گرام بندہ پارسل نمبر 02 میں بندہ پارسل کے پارسل حلقہ کے اعداد 1/1 عدودہ مہرہ کنسیلیان کی BM بند  
کی جبکہ پارسل حلقہ کے 3/3 عدودہ مہرہ کنسیلیان کی BM قیمت کی ہر دہرٹ (2) پارسل میں کے لئے مہرہ کنسیلیان جرم ہلاک مہرہ کنسیلیان حساب ضابطہ  
گردار کر کے مراسلہ مہرہ کنسیلیان پیکٹ کی پرچہ دست کنسیلیان مہرہ الدین 1837 تمام ہے چوہانہ کنسیلیان مہرہ کنسیلیان مہرہ کنسیلیان مہرہ کنسیلیان  
اگر مہرہ کنسیلیان ASI تمام AMIS مہرہ کنسیلیان 29.12.2023 کا تمام مہرہ کنسیلیان مہرہ کنسیلیان مہرہ کنسیلیان مہرہ کنسیلیان مہرہ کنسیلیان  
افضل خان OH کے جائے تمام پرچہ گزارش ہے۔

ASI M zhar Sher  
29-12-2023



OFFICE OF THE  
SUPERINTENDENT OF POLICE CITY DIVISION  
CAPITAL CITY POLICE PESHAWAR

091-92253331 / spcitypeshawar@yahoo.com

No. 2791 / Reader

dated 29/12/2023

B

11

To: The Senior Superintendent of Police,  
Operations, Peshawar.

Subject: INCIDENT REPORT

It is submitted that audio messages between two parties regarding bargaining for the release of two arrested accused of narcotics were widely viral on social media which were tasked to the undersigned for proper enquiry by the high ups:

To trace the involved individual, a special team comprising of SDPO Pishtakhara and SHO Sarband was constituted who contacted the dealing hands and fixed two lac in lieu of release of arrested accused. The dealer fixed the venue for receiving the fixed amount. At about 1710 Hrs on dated 28.12.2023, the team arranged the money and reached to the venue where the team succeeded to apprehend the dealer red handed. After interviewing, the dealer disclosed his name Younas s/o Sifat Shah resident of Superior Science College PS AMJS and deposed that he made bargaining on the directions of ASI Zeeshan Incharge PP Science College and his gunner FC Mohabbat in connection with the release of arrested accused Gul Nazir and Mustaqeeru resident of Tirah.

To verify the statement of Younas s/o Sifat Shah, the ASI Zeeshan and FC Mohabbat were called to the office and were heard in person who supported his version.

After going through the whole episode, both the officials were found guilty therefore, they are recommended for proper departmental proceedings.

  
Superintendent of Police City Division  
Capital City Police, Peshawar

Better Copy

*Better copy*

10

**OFFICE OF THE  
SUPERINTENDENT OF POLICE CITY DIVISION  
CAPITAL CITY POLICE PESHAWAR**

To  
The Senior Superintendent of Police,  
Operation, Peshawar

Subject: **INCIDENT REPORT**

It is submitted that audio messages between two parties regarding bargaining for the release of two arrested accused of Narcotics were widely viral on Social Media which were tasked to the undersigned for proper by the high ups.

To trace the involved individual, a special team comprising of SDPO Pishtakhara and SHO Sarband was constituted who contracted the dealing hands and fixed two lac in view of release of arrested accused. The dealers fixed the venue for receiving the fix amount. At about 17:30 hrs on dated 28.12.2023 the team arranged the money and reached to the venue where the team succeeded to apprehend the dealer red handed. After interviewing, the dealer disclosed his name Younis S/o Sifat Shah R/o Superior Science College PSMIS and deposed that he made bargaining on the directions of ASI Zeeshan Incharge PP Science College and his Gunner FC Mohabbat in connection with the released of arrested of the accused Gul Nazar and Mustaqeem R/o Tirah.

To verify the statement of Younas S/o Sifat Shah, ASI Zeeshan, FC Mohabbat were called to the office and were heard in person who supporting his version.

After going through the whole episode, both the official were found guilty therefore, they are recommended for proper Departmental proceedings.

Superintendent of Police  
Capital city Police. Peshawar

12

**ORDER**

On the recommendation of SP City, Peshawar vide his office memo No. 2791/F dated 29.12.2023, that audio messages between two parties regarding bargaining for the release of two arrested accused of narcotics were widely viral on social media which were tasked to the Enquiry Officer for proper enquiry by the high-ups. To trace the involved individual, a special team comprising of SDPO Pishtakhara and SHO Sarband was constituted who contacted the dealing hands and fixed two lac in lieu of release of arrested accused. The dealer fixed the venue for receiving the fixed amount at about 1730 hrs on dated 28.12.2023, the team arranged the money and reached to the venue where the team succeeded to apprehend the dealer red handed. After interviewing, the dealer disclosed his name Younas s/o Sifat Shah r/o Superior Science College PS AMJS and deposed that he made bargaining on the directions of ASI Zeeshan incharge PP Science College and his gunner Constable Mohabat in connection with the release of arrested accused Gul Nazur and Mustaqeem resident of Tirah. To verify the statement of Younas s/o Sifat Shah the ASI Zeeshan and Constable Mohabat were called to the office and heard in person who supported his version. After going through the whole episode, both the officials were found guilty. Later on the accused were charged in case wide FIR No. 2391 dated 29.12.2023 w/s 9DCNSA and FIR No. 2390 dated 29.12.2023 w/s 9DCNSA Police Station AMJS.

Keeping in view the above explained position, they were called in Orderly Room on 29.12.2023 and heard in person. The accused officials during personal hearing were given ample opportunities to defend themselves but they failed to produce any plausible reasons in their defense. They were also cross examined. They stated that they wanted to trap and arrest the man to whom he was talking for bargaining. They were questioned as to whether they informed their senior officers before the trap/dealing to which they replied in negative. They also admit to have had dealing conversation on record. It is crystal clear that they did not inform any senior officers before dealing which smells a rat on their part, thus, the allegations leveled against them stand proved beyond any shadow of doubt and like such negligence and unfair actions of black sheeps who were dressed in police uniform cannot be ignored. Thus, they brought bad name to the police department. Therefore, I, Kashif Aftab Ahmad Abbasi, Senior Superintendent of Police, Operations, Peshawar, in exercise of the powers conferred on me under Police Rules, 1975 award them the major punishment of "Dismissal" from service with immediate effect.

1. ASI Zeeshan Khan No. 5775 I/C PP Science College PS AMJS.
2. Constable Mohabat No. 6584 PS AMJS.

Order announced

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

No. 2194-99 PA dated Peshawar, the 29/12/2023.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. SSP Coordination Peshawar.
3. SsP City, Security & HQrs, CCP Peshawar.
4. SDPOs Suburb/Pishtakhara CCP Peshawar.
5. EC-1/0ASI/CRC/PO/FMC along with complete enquiry file for record ( ).

Received by the ... on 29/12/2023.  
Signature: ...  
Copy for information and necessary action to:-  
1. ...  
2. ...  
3. ...  
4. ...  
5. ...

Better copy

(12)

Better Copy

ORDER

On the recommendation of SP City Peshawar vide his office memo No. 2791/F dated 29.12.2023, the audio message between two parties regarding bargaining for the released of two arrested accused of narcotics were widely viral on social media which were task to the inquiry officer for proper inquiry by the High-Ups.

To traced the involved individuals a special Team comprising SDPO Pisthakara and SHO Sarband was constituted who connecting the dealing hands and fixed two lac in lieu of release of arrested accused. The dealer fixed the venue for receiving the fixed amount at about 1730 hrs on dated 28.12.2023, the team arranged the money and reached to the venue where the team succeeded to apprehend the dealer red handed. After interviewing the dealer disclose his name Younas S/o Sifat R/o Superior Science College PSAMJS and disposed that he made bargaining on the direction of ASI Zeeshan Incharge PP Science College and his Gunner Constable Mohabat in connection with the released of arrested accused Gul Nazar and Mustaqeem R/o Tirah to verify the statement of Younas S/o Sifat Shah ASI Zeeshan and Constable Mohabat were called to the office and heard in person who supported his version. After going through the whole episode, both the official were found guilty. Later on the accused were charged in case vide FIR No. 2391 dated 29.12.2023 U/S 9-D, CNSA and FIR No. 2390 dated 29.12.2023 U/S 9-D CNSA, Police Station AMJS.

Keeping in view the above explained position they were called in orderly Room on 29.12.2023 and heard in person. The accused official during personal hearing were given ample opportunities to defend themselves but they failed to produce plausible reason in their defense. They were also cross examined they stated that they wanted to trap and arrest the man whom he was talking for bargaining. They were questioned as to whether they informed their senior officer before the trap dealing to which they replied in negative. They also admit to have had dealing conversation on record. It is crystal clear that they did not inform any senior officer before dealing which smiles a rate on their part, thus, the allegation levelled against them stand proved beyond any shadow of doubt and like such negligence and unfair action of black sheep's who were dressed in Police inform cannot be ignored. Thus they brought bad name to the Police department therefore, I, Kashif Aftab Abbasi, Senior Superintendent of Police Operation, Peshawar, in exercise of the power conferred on me under Police Rules, 1975 award him the major punishment of "Dismissed" from service with immediate effect.

1. ASI Zeeshan Khan No. 5775 I/C PP Science College PS AMJS.
2. Constable Mohabat No. 6584 PS AMJS.

Order announced.

(Lt Cdr Kashif Aftab Ahmad ABB, (ASI) PSP

Senior Superintendent of Police,  
Operation, Peshawar

No. 2194-99/PA dated Peshawar, the 29/12/2023

Copy of information and necessary action to:

1. The Capital City Police Officer, Peshawar.
2. SSP Coordination Peshawar.
3. SSP City, Security and HQRs CCP Peshawar.
4. SDPO Subordinate Pishtakara CCP Peshawar.
5. EC

26  
19-01-2024  
PACCPO

13

The worthy Capital City Police Officer, Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 29.12.2023, WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE.**

**RESPECTED SIR,**

That the appellant was appointed as Constable the year 2014 and completed all his due trainings. The appellant since his appointment has performed his duty with devotion and honesty whatsoever assigned to him and no complaint has been filed against him regarding his performance.

That the appellant was posted in Police Post Science College Police Station Yakathoot. The appellant along with ASI Zeeshan Khan, who was in-charge of the Police Post, was on routine gasht on ring road on 28.1.2023 has stopped Suzuki pick up and put down two suspected persons from the Suzuki and on their search narcotics were recovered from them and they disclosed their name as Gul Nazar and Mustaqim. The ASI Zeeshan Khan informed SHO of concerned Police Station Yakathoot about the matter on which the SHO directed the ASI Zeeshan Khan to trace the main dealer with the help of that arrested persons.

That on the direction of SHO, ASI Zeeshan Khan asked from the accused about the dealer who provide them narcotics for distribution on which Gul Nazar told ASI Zeeshan Khan that a person namely Gul g is the dealer who provide them narcotics for distribution on which the appellant took mobile from Gul Nazar and contacted Gul g through his mobile in order to persuaded him to come to the spot so that they trap him and arrest him as per direction of his SHO on which he wanted some bargain on the release of the accused, however, ASI Zeeshan Khan told the appellant to insist Gul g to come to the spot on ring road so that they also arrest him, however, Gul g told him that he not present and his partner will come to the spot near at KDF Restaurant on ring road and the ASI Zeeshan Khan also contacted with his informer (Younas) to come to the spot near KDF Restaurant on ring road to help them to trap and arrest of partner of Gul g on

FMC  
17/1/2024

for...  
19-01-24



(14)

which the informer (Younas) came to the spot and as per direction of the ASI Zeeshan Khan informer (Younas) was waiting for the partner of Gul g at the spot near KDF Restaurant on ring road and the appellant along with ASI Zeeshan Khan were waiting on the other side of the road and in meanwhile the police team comprised of SDPO Pishtakhara and SHO Sarband along with other Police Officials came to the spot and arrested informer Younas on which ASI Zeeshan Khan came near to the police team and told them that the person you arrested is his informer and told them that he has contacted with his SHO about the arrest of accused Gul Nazar and Mustaqim and on his direction to trap the real dealer of narcotics he has done the whole process and told them the whole story and that moment ASI Zeeshan also contacted with his SHO of concerned Police Station Yakathoot and told him about the occurrence on which the SHO told the ASI Zeeshan that he is present with the DSP Subrab and tell him on which DSP Subrub also contacted SDPO Pishtakhara through his mobile phone and told him about the reality of the issue.

4. That SP City Division CCP, Peshawar submitted report on 29.12.2023 to the SSP Operation, Peshawar about the incident and recommended for proper departmental proceeding against the appellant, but without conducting any inquiry against the appellant, he was dismissed from service on the same day of submission of report i.e 29.12.2023 vide order dated 29.12.2023. (Copy of order dated 29.12.2023 is attached as Annexure-A)
5. That the appellant now wants to file departmental appeal to your Honor against the order dated 29.12.2023 on the following grounds.

**GROUND:**

- A) That order dated 29.12.2023 is against the law, rules, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That inquiry was not conducted against the appellant to dig out the reality about the allegation/incident before passing the dismissal order dated 29.12.2023, which is violation of law and rules and as such the order 29.12.2023 is liable to be set aside.

- (C) That SP City Division CCP, Peshawar submitted report on 29.12.2023 to the SSP Operation Peshawar about the incident and recommended for proper departmental proceeding against the appellant, but despite of recommendation of SP City for proper departmental proceeding, no inquiry was conducted against the appellant to dig out the reality about the allegation/incident and dismissed the appellant from his service on the same day of submission report i.e 29.12.2023 vide order dated 29.12.2023. which means that the appellant has not been treated in accordance with law and rules and has been punished in slip shod manner without conducting proper inquiry about the allegations/incident, which is not permissible under the law and as such the order dated 29.12.2023 is liable to be set aside.
  
- (D) That when ASI Zeeshan Khan Incharge Police Post and appellant has arrested two persons due to recovery of narcotics from them, ASI Zeeshan has properly informed his SHO of the concerned Police Station Yakathoot about the matter on which the SHO directed the ASI Zeeshan Khan to trace the main dealer with the help of that arrested persons and on the direction of SHO, the ASI Zeeshan Khan asked from the accused about the dealer who provide them narcotics for distribution on which Gul Nazar told the ASI Zeeshan Khan that a person namely Gul g is the dealer who provide them narcotics for distribution, on which appellant took mobile from Gul Nazar and contacted Gul g through his mobile in order to persuaded Gul g to come to the spot so that they trap him and arrest him as per direction of his SHO and told Gul g about the arrest of Gul Nazar and Mustaqim on which he wanted some bargain for release of accused, however, the ASI Zeeshan Khan told the appellant to insist Gul g to come to the spot on ring road so that they also arrest him, however, Gul g told the appellant that he is not present and his partner will come to the spot near at KDF Restaurant on ring road and ASI Zeeshan Khan also contacted with his informer (Younas) to come to the spot near KDF Restaurant on ring road to help them to trap and arrest of partner of Gul.g on which the informer (Younas) came to the spot and as per direction of ASI Zeeshan Khan informer (Younas) was waiting for the partner of Gul g at the spot near KDF Restaurant on ring road and the appellant along with SI Zeeshan Khan were waiting on the other side of the road and in meanwhile the police team comprised of SDPO Pishtakhara and SHO Sarband along with other Police Officials came to the spot and arrest informer Younas on which the appellant along with ASI Zeeshan Khan came near to the police team and ASI Zeeshan Khan told them that the person you arrested is

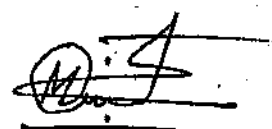
his informer and told them that he has contacted with his SHO about the arrest of accused Gul Nazar and Mustaqim and on his direction to trap the real dealer of narcotics he has done the whole process and told them the whole story, which means that the appellant did not commit any misconduct and all has done on the direction of his SHO to trap the real dealer of the narcotics which has given to ASI Zeeshan Khan, but despite that high ups of the appellant connected the matter with appellant on presumption basis without conducting regular and proper inquiry to dig out the realty about the issue/allegation which is against the norms of justice and fair play.

- D) That in the dismissal order, it is mention that the ASI Zeeshan along with the appellant has not informed his any senior officer about the matter, but ASI Zeeshan Khan has properly informed his SHO of Police Station Yakathoot about the matter and arrest of the Nazar Gul and Mustaqim and even when the police team arrived to the spot and arrested informer Younas, at that moment the ASI Zeeshan Khan also contacted with his SHO of concerned Police Station Yakathoot and told him about the occurrence on which the SHO told the ASI Zeeshan Khan that he is present with the DSP Subrab and tell him on which DSP Subrub also contacted SDPO Pishtakhara through his mobile phone and told him about the realty of the issue, which means that the appellant did not commit any misconduct and has been punished for no fault on his part.
- E) That the appellant told the police team on the spot as well as during personal hearing that ASI Zeeshan Khan who was the incharge of the Police Post has timely informed his SHO about the matter and on the direction of the SHO he done all the process in order to trap and arrest the main dealer of narcotics, but even the statement of SHO of Police Station Yakathoot was not recorded to dig out the realty about the matter/allegation and dismissed the appellant in slip shod manner which is not permissible under the law and rues.
- G) That no charge sheet was issued to the appellant in order to defend himself, which is violation of law and rules.
- H) That even the show cause notice was not issued to the appellant before passing the dismissal order dated 29.12.2023, which is against the norms of justice and fair play.

17

- 1) That the opportunity of proper defense was not provided to the appellant, which is against the spirit of Article 10-A of the Constitution.
- 2) That the appellant has not been treated in accordance with law and rules and has been condemned unheard throughout.

*It is, therefore most humbly requested that on acceptance of this departmental appeal, the order dated 29.12.2023 may kindly be set aside and the appellant may be reinstated into service with all back and consequential benefits.*



APPELLANT

Dated: 19-01-2024.

Mohabat, Ex-Constable No.6584,  
PP Science College PS AMJS



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 Muhabat Khan No. 6584, who was awarded the major punishment of "dismissal from service" under KP PR-1975 (amended 2014) by SSP/Operations, Peshawar vide order No. 2194-99/PA, dated 29.12.2023.

2- Brief facts leading to the instant appeal are that the defaulter Constable while posted as gunner of I/C PP Science College, PS AMJ-Shah Peshawar was held responsible that as per recommendation of SP/City, Peshawar vide his office memo No. 2791/R, dated 29.12.2023, that an audio message between the 02 parties regarding bargaining for release of 02 accuseds of narcotics were widely viral on social media which were tasked to the Enquiry Officer for proper enquiry by the high-ups. To trace the involved individuals, a special team comprising of SDPO Pishtakhara and SHO Sarband was constituted who contacted the dealing hands and fixed 02 lacs in lieu of release of arrested accused. The dealer fixed the venue for receiving the said amount at about 17:30 hrs dated 28.12.2023, the team arranged the money and reached to the venue where the team succeeded to apprehend the dealer red handed. After interviewing, the dealer disclosed his name Younas s/o Sifat Shah r/o Superior Science College PS AMJ-Shah and disposed that he made bargaining on the direction of ASI Zeeshan I/C PP Science College and his gunner Constable Mohabat in connection with the release of arrested accuseds i.e. Gul Nazar and Mustaqeem resident of Tirah. On account of this, he was awarded the major punishment of dismissal from service.

3- 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. 2194-99/PA, dated 29.12.2023 is hereby rejected/filed.

**"Order is announced"**

CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 1184-93 /PA,

dated Peshawar the 20 03/2024

Copies for information and necessary action to the:-

1. SSP/Operations Peshawar.
2. SP/HQrs: Peshawar
3. AD/IT CCP Peshawar.
4. PO, EC-II, AS, CRC, OASI & FMC alongwith complete Fuji Misal.
5. Official concerned.

Handwritten notes in Urdu script, likely a list or index of items, possibly related to a collection or inventory. The text is dense and difficult to decipher due to the cursive style and some fading.

Handwritten notes in Urdu script, continuing the list or index. The text is dense and difficult to decipher due to the cursive style and some fading.

13488/88  
22-3-24

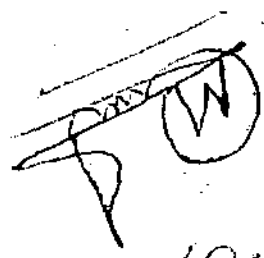
(19)

F

Handwritten notes at the bottom of the page, possibly a signature or additional information.

0212-9914902

1584



Handwritten text in Hindi, possibly a title or introductory sentence.

Handwritten text in Hindi, appearing to be a list or set of instructions.

Main body of handwritten text in Hindi, consisting of several lines of notes or a list.

Chief Constable,  
Kent Police

Mrs SHARIF KHAN (S/P)

*[Handwritten initials]*

- 5. VA TO ADD: KYBER PAKHTUNKHWA, PESHAWAR
- 4. VA TO ADD: KYBER PAKHTUNKHWA, PESHAWAR
- 3. AIG/IGM, KYBER PAKHTUNKHWA, PESHAWAR
- 2. SSP Operations, C/P Peshawar

1. Capital City Police Officer, Peshawar. The Service Unit and the Inquiry File in the above mentioned PC received vide your office Memo No. 1513/CRC, dated 24.01.2024 as received.

Copy of the above is forwarded to the  
No. 57/1693-17 /21, dated Peshawar, the 05-01-2024

Additional Inspector General of Police,  
Peshawar, Peshawar, Peshawar

AWAL KHAN, I/P

S/P

The period he remained out of service be treated as leave without pay. The punishment of suspension of one month without cumulative effect. The in reinstated into service with back pay is hereby accepted by modifying the major punishment of dismissal from service into removal. The punishment was heard in person. The heard by taking known view decided that the removal order was cancelled that the concerned S/PC directed to arrest the main drug dealer.

Meeting of Appeals Board was held on 27.01.2024 wherein punishment was heard in person. The order under No. 1194-12027/A, dated 20.03.2024. The Appeals Authority for C/P Peshawar heard the application in A/C & rejected the appeal vide connection with the release of arrested accused for Civil Court and Management consistent of the hearing on the direction of ASI Zehra B. P. Science College and has former Constable Movement in name Younis who still study in Superior Science College in A/C-Peshawar and disposed that no major offence was found in the said. After interviewing, the dealer was released on the basis of arrested accused. The dealer fixed the venue for receiving the money and referred to the court of Peshawar and S/PC Peshawar who contacted the dealing hands and traced the money to the court of Peshawar by High Court. To trace the involved individuals, a special team consisting of S/PC Peshawar of 02 accused of incidents were widely used in social media which were linked to the court memo No. 2791/A, dated 29.12.2023, that an audio message between the parties regarding management of A/C-Peshawar was held responsible that as per recommendation of S/PC Peshawar vide his office memo No. 2194-997/A, dated 29.12.2023 on the allegations that he while posted in former C/P Science College, Peshawar operations awarded the punishment major punishment of dismissal from service vide order under No. 1194-12027/A, dated 20.03.2024 submitted by Ex-PC. Major punishment was suspended. This order is hereby passed in disposal of Revision Petition under Rule 11-A of Criminal

ORDER

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR



*[Handwritten numbers 21 and 9]*



Better Copy

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
PAKHTUNKHWA  
PESHAWAR

(21)

**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-FC Muhabat Khan No. 6584 SSP/Operations awarded the petitioner major punishment of dismissal from service vide order Endst No. 2194-99/PA dated 29.12.2023 on the allegation that he while posted at gunner I/C PP Science College PS AMJ-Shah Peshawar was held responsible that as per recommendation of SP/City, Peshawar vide his office memo No. 2791/R., dated 29.03.2023, that an audio message between two parties regarding bargaining for release of 02 accused of Narcotics were widely viral on media which were tasked to the E.O for proper inquiry by high-ups. To trace the involved individuals, a special team comprising of SDPO Pishtkhara and SHO Sarband was constituted who contacted the dealing hands and fixed 02 lacs in lieu of released of arrested accused. The dealer fixed the venue for receiving the money and reached to venue where the team succeeded to apprehend the dealer red handed after interviewing, the dealer disclosed his name Younis Khan S/o Sifat Shah r/o superior Science College PS AMJ-Shah and disposed that he made bargaining on the direction of ASI Zeeshan I/C PP Science College and his gunner constable Mohabat in connection with the release of arrested accused i.e Gul Nazar and Mustaqeem resident of Teerah.

The Appellate authority i.e Capital City Police Officer / Peshawar heard the appellant in OR & rejected his appeal vide order Endst No. 1194-1202/PA, dated 20.03.2024.

Meeting of the appellate Board heard on 27.06.2024 wherein petitioner was heard in person. The petitioner contented that the concerned SHO directed to arrest the main drug dealer.

The petitioner was heard in person. The Board by taking lenient by view decided that his revision petition is hereby accepted by modifying his major punishment of dismissal from service into minor punishment of stoppage of one increment without accumulative effect. He is reinstated into service with immediate effect. The period he remained of service be treated as leave without pay.

Sd

AWAL KHAN PSP

Additional Inspector General of Police  
HQrs Khyber Pakhtunkhwa, Peshawar

No. S/1693-24, dated 05.07.2024

Copy of the above forwarded to the

1. Capital Police officer, Peshawar one Service Roll and one Enquiry File of the above named FC received vide your office memo No. 7512, dated 29.04.2024 is returned herewith for your office record.
2. SSP Operation, CCP Peshawar.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: Inspector General of Police /HQrs Khyber Pakhtunkhwa, Peshawar.
5. PA to AIG/HQrs Khyber Pakhtunkhwa Peshawar.

(SONIA SHAMROZ HAN)

PSP

AIG/Establishment  
For Inspector General of police  
Khyber Pakhtunkhwa Peshawar

H  
//

(22)

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

**SERVICE APPEAL NO. 590/2024**

Muhabbat Khan

V/S

Police Department

**APPLICATION FOR PERMISSION TO SEEK AMENDMENT IN**  
**THE INSTANT APPEAL DUE TO PASSING THE ORDER DATED**  
**05.07.2024**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed the instant appeal in this Honorable Tribunal against the order dated 29.12.2023, whereby the appellant was dismissed from service and against the order dated 20.03.2024 whereby the departmental appeal of the appellant was also rejected along with the prayer to reinstate him with all back benefits.
2. That the appellant also filed revision before the Provincial Police Officer which was decide on 05.07.2024, wherein the revision of the appellant was partially accepted and his major punishment of dismissal from service was modified into minor punishment of stoppage of one (01) with cumulative effect and was reinstated into service with immediate effect and his intervening period was treated as leave without pay. (Copy of order dated 05.07.2024 is attached as Annexure-A).
3. That the appellant has filed the instant appeal with the prayer to reinstate him with all back and consequential benefits, but he was reinstated into service by modifying his major punishment of dismissal from service into minor punishment of stoppage of one annual increment with cumulative effect and his intervening period was treated as leave without pay in the order added 05.07.2024. Therefore, the appellant wants to amend the instant appeal by impugning the order 05.07.2024 in this Honorable Tribunal.

23

It is therefore, most humbly prayed that on the acceptance of this application, the appellant may kindly be allowed to the extent that the instant appeal by impugning the order dated 05.07.2023.

APPELLANT

THROUGH:



TAIMUR ALI KHAN  
ADVOCATE

**AFFIDAVIT**

it is solemnly affirm that the contents of this application is true and correct and nothing has been concealed from this Honorable Tribunal.

  
DEPONENT

24



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

SERVICE APPEAL NO. 590 /2024

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12214

Date 16-04-2024

Mohabat Ex-Constable No.6584,  
PP Science College PS AMIS, Peshawar.

(APPELLANT)

VERSUS

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

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 29.12.2023, WHEREBY MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WAS IMPOSED UPON THE APPELLANT AND AGAINST THE ORDER DATED 20.03.2024, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.

Filed to-day  
Registrar  
16/4/24

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 29.12.2023 AND 20.03.2024 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.

Re-submitted to -day  
Registrar

23/4/24

ATTESTED  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

25



20.08.2024

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

02. Learned counsel for the appellant submitted application for permission to file amended appeal alongwith copy of order dated 05.07.2024 passed on revision petition of the appellant whereby the Revision Board has converted the major penalty of dismissal from service into minor punishment of stoppage of one increment without cumulative effect and reinstated him into service with immediate effect. Request is allowed. He may do so within a week. To come up on 25.09.2024 before S.B. P.P given to the parties.

(Muhammad Akbar Khan)  
Member (E)

\*Kawra/Sat\*

ATTESTED

EXAMINED  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

*[Signature]*  
12/8/24

Date of Presentation of Application 12/8/24  
Number of Words Page = 2  
Copying Fee 10/-  
Urgent 5/-  
Total 15/-  
Name of Copyist [Signature]  
Date of Completion of Copy 12/8/24  
Date of Delivery of Copy 12/8/24

**VAKALAT NAMA**

NO. \_\_\_\_\_/2024

IN THE COURT OF

Khyber Pakhtunkhwa Service Tribunal Peshawar

Mohabat

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Deptt

(Respondent)  
(Defendant)

I/We,

Mohabat

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

(CLIENT)

**ACCEPTED**

**TAIMUR ALI KHAN**  
*Advocate High Court*

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

**SHAKIR ULLAH TORANI**  
*Advocate Peshawar*

**BC-22-4994**  
**03409146056**