


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **1746/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02 /10/2024	<p>The appeal of Mr. Ijaz Khan received today by registered post through Mr. Muhammad Abdullah Baloch Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on 22.10.2024. Counsel for the appellant has been informed telephonically.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR AT CAMP DERA ISMAIL KHAN,

Service Appeal No. 1746/2024

Ejaz Khan
(Appellant)

Versus

Regional Police officer and others
(Respondents)

Service Appeal

I N D E X

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and CM along with affidavits	--	1-9
2.	Copies of CNIC and Service Card	A & A/1	10, 11
3.	Copies of charge sheet and statement of allegations	B & C	12, 13
4.	Copy of corrigendum and reply of charge sheet	D & E	14-16
5.	Copy of impugned Office Order dated 25/04/2024	F	17
6.	Copy of a departmental appeal	G	18, 19
7.	Copy of the impugned Appellate Authority Order	H	20, 21
8.	Copy of review U/S 11-A	I	22-27
9.	Copy of the list of NCP articles from 12/03/2023 to 30/11/2023	J	28-34
10.	Miscellaneous/Medical reports		35-37
11.	Vakalatnama	--	38

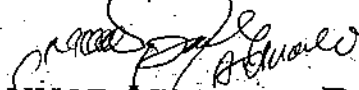
Dated: 01/10/2024

Your humble appellant



(Ejaz Khan)

Through counsel



MUHAMMAD ABDULLAH BALOCH

Advocate Supreme Court

03146932887

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR AT CAMP DERA ISMAIL KHAN.

Service Appeal No. 1746/2024

Ejaz Khan S/o Muhammad Iqbal caste Ustrana R/o Barkat abad Colony University
Road Post Office GPO, Dera Ismail Khan.

Ex-Constable Belt No. 2076/L lastly posted at PS Band Kurai, D.I.khan.

Cell No. 0346-7878646

Appellant

VERSUS

1. Regional Police Officer, Dera Ismail Khan.
2. District Police Officer, Dera Ismail Khan.

Respondents

SERVICE APPEAL UNDER SECTION 4 OF SERVICE
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
OFFICE ORDER NO. 2883/EC DATED 25/04/2024 (OB No.
7491 DATED 25/04/2024) WHEREBY THE APPELLANT
HAS BEEN AWARDED "MAJOR PUNISHMENT OF
DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT"
AND APPEAL AGAINST OFFICE ORDER NO. 5190/ES
dated 01/08/2024 D.I.Khan (OB NO. 1395 DATED
07/08/2024) OF THE APPELLATE AUTHORITY
WHEREBY APPEAL WAS REJECTED.

Note: That the addresses of the Parties given in the heading of the
Petition are true and correct for the purpose of service.

Respected Sir;

1. That the appellant was initially serving under the domain of Assistant Political Agent as levies Constable and after merger, had been serving under the domain of District Police Officer D.I.khan since 2019. Appellant has entire unblemished service record. Before the inflection of punishment by the District Police Officer, DIKhan (dated 25/04/2024), the appellant had been performing his duties as Constable at PS Band kurai D.I.khan. Copies of CNIC and Service Card of the appellant are annexed as Annexure-A & A/1.
2. That appellant was posted as incharge (I/C) check post Mughal Kot w.e.f 25/10/2023 and perform his duties honestly till 15/12/2023. (Total 51 days). That utmost surprise, one fine morning, the Worthy DPO D.I.Khan charge sheeted the appellant with allegations of "involvement in smuggling of Iranian Oil". Copies of charge sheet and statement of allegations No. 1980/EC dated 09/04/2024 are annexed as Annexure-B & C.
3. That the SP City DIKhan was appointed as an inquiry officer to conduct inquiry in accordance with the provisions of Police Rules, 1975. A corrigendum vide No. 2215/EC dated D.I.Khan the 19/04/2024 was issued and period of posting of appellant was mentioned w.e.f. 25/10/2023 to 15/12/2023 as I/C Check Post Mughal Kot. Though, the appellant properly replied the charge sheet. Copy of corrigendum and reply of charge sheet is annexed as Annexure-D & E.
4. That in sheer violation of Police Rules and ESTA Code and Principle of Natural Justice, appellant was condemned unheard and was not taken on-board by the Inquiry Officer and even today the appellant is unaware about the proceeding and findings of the Inquiry Officer and the Inquiry Report respectively.
5. That thereafter, the Worthy District Police Officer, Dera Ismail Khan vide impugned office Order No.2883/EC dated D.I.Khan 25/04/2024, (OB No. 7491 dated 25/04/2024) awarded a Major punishment of "Dismissal from service with immediate effect" to the appellant. Copy of impugned Office Order dated 25/04/2024 is annexed as Annexure-F.

Asst. Insp. Police

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6. That appellant was not communicated with impugned order, which was communicated to the appellant on 06/05/2024. The appellant preferred departmental appeal/representation on 20/05/2024 to the appellate authority i.e Worthy RPO D.I.khan. Copy of a departmental appeal is annexed as "Annexure-G".
7. That Appellate Authority, Worthy RPO D.I.khan region rejected the appeal of the appellant vide impugned Order No. 5190/ES dated 01/08/2024 (OB No. 1395 dated 07/08/2024). The said order of the Appellate Authority was received on 16/08/2024. Copy of the impugned Appellate Authority Order is annexed as ANNEXURE-H
8. That appellant preferred a revision petition under rule 11-A of Police Rules, 1975, amended 2014, to the worthy inspector general of police (IGP) KP, Peshawar. But up till now no response has been shown from the Revisional Authority. Copy of review U/S 11-A is annexed as Annexure-I. That cause of action has been accrued to the appellant for instant appeal; hence, the instant service appeal is being filed, inter alia on the following grounds.

GROUND

1. That the impugned Office Orders of the respondents Order No. 2883/EC Dated 25/04/2024 (OB No. 7491 Dated 25/04/2024) and Order No. 5190/ES dated D.I.Khan 01/08/2024 (OB NO. 1395/ES Dated 07/08/2024) are against law, against service rules, void and are in sheer violation of KP Police rules, 1975 (amended in 2014) and KP Government Servant (E&D) rules 2020.
2. That name of the appellant is **EJAZ Khan** and this name is mentioned not only in the CNIC but also in the entire Service record but the respondents has acted in such a haste manner that in impugned orders and in the charge sheets name is wrongly being reflecting as **IJAZ Khan**.
3. That not a single iota of evidence is available on the record to prove any nexuses of the appellant with the allegations. The allegations are based on surmises and conjunctures. Allegations against the appellant are false,

erroneous, illegal void ab-initio, hence, the impugned orders are liable to be set aside.

4. That after submission of reply of allegations, the appellant was not taken on-board by the Inquiry Officer. Appellant is entirely unaware about enquiry proceedings. Besides, enquiry was conducted in such a haste manner that copy of enquiry report was not provided to the appellant. The appellant was not dealt with according to the law and rules.
5. That the impugned order is patently illegal, void ab-initio, unwarranted and legally not sustainable in the eyes of law on the ground that appellant was not given an opportunity of being heard. The impugned order infringing the valuable vested rights, thus liable to be set aside on this score alone.
6. That the Inquiry Officer was under the mandate to dig out the real facts of the allegations and appellant has a right that evidence (oral or documentary) be confronted to him. So, he must have an opportunity to rebut the same. Thus, Inquiry Officer sheerly committed illegality and violated article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 by not conducting fair trial.
7. That the appellant was not given an opportunity to confront the evidence collected against him by the Inquiry Officer, even the appellant did not know that what evidence was collected by the Inquiry Officer against the appellant. Moreover, the appellant was not given any opportunity to cross examine any witnesses against him, even the appellant did not know whether any witness was examined or has given any statement against the appellant.
8. That appellant was awarded major punishment but competent authority did not issue any **final show cause notice**, which is a gross illegality. The impugned order itself showing that rules has not been followed and fundamental rights of appellant has been violated.
9. That Corrigendum was issued vide No. 2215/EC dated D.I.Khan 19/04/2024 qua charge sheet No. 1980-82/EC dated 09/04/2024, wherein dates of period of postings were rectified. Corrigendum showing period of posting of appellant at Mughal Kot check post from 25/10/2023 to 15/12/2023. Total days come as approximately 51. That during the period, the appellant posted as Incharge check post,

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showed meritorious results against smuggling and smugglers, and recovered and handed over to the intelligence custom and concerned authorities, bulk of NCP items and diesel amounting approximately in crores. The appellant was with the positive expectations of appreciation from the high-ups but impugned orders were issued against the appellant. Inquiry officer was under the mandate to bring this fact on record but appellant remain victim of partiality. Copy of the list of NCP articles from 12/03/2023 to 30/11/2023 is annexed as Annexure-J.


10. That there is neither a single complaint nor any application was Submitted against the present appellant throughout his service career.
11. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under Appeal.
12. That the counsel for Appellant may be allowed to argue additional grounds at the time of arguments.

It is, therefore, respectfully prayed that on acceptance of this appeal, IMPUGNED OFFICE ORDER NO. 2883/EC DATED 25/04/2024 (OB No. 7491 DATED 25/04/2024) WHEREBY THE APPELLANT HAS BEEN AWARDED "MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT" AND ORDER NO. 5190/ES dated D.I.Khan 01/08/2024 (OB NO. 1395 DATED 07/08/2024) may kindly be set aside. The appellant may kindly be re-instated into service with all back benefits.

Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Dated: 07/10/2024

Yours Humble Appellant



(Ejaz Khan)

Ex-constable

Belt No. 2076/L



Through Counsel

MUHAMMAD ABDULLAH BALOCH

Advocate Supreme Court

Dera Ismail Khan

(0314693255)

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR AT CAMP DERA ISMAIL KHAN,

Service Appeal No. _____/2024

Ejaz Khan
(Appellant)

Versus

Regional Police officer and others
(Respondents)

Service Appeal

VERIFICATION

Verified on oath at D.I.Khan, this 1st day of October, 2024, that all contents of the above appeal are true and correct and appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.


Dated: 1 /10/2024

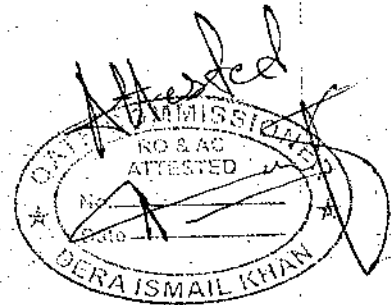

Appellant

AFFIDAVIT

I, **Ejaz Khan**, appellant herein, do hereby solemnly affirm on oath that all parawise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal.

01 /10/2024


Deponent



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would be redressed. Simultaneously, the appellant, being the only bread feeder of his family, was under the severe mental shock due to loss of job. The appellant was a very honest and hard working servant of the respondent and had positive expectations of appraisal from the high-ups, but was dismissed from service. That severe mental condition led to the appellant under medical treatment. The appellant suffered great depression and got fainted due to minor nervous breakdown. The appellant visited the psychiatrist on 10/09/2024 and remained bed ridden for few days but couldn't recovered. On 14/09/2024, the appellant again visited the hospital and was advised not to walk or drive on road due to weak mental condition. The appellant again visited hospital on 22/09/2024 and the doctor decreased the medication to some extent. After feeling some better, the appellant handed over the entire brief to the Counsel on 28/09/2024. The instant appeal, after preparation and compilation is being filed today and is being sent today i.e 01/10/2024 via courier.

Miss P. J. Jais

4. That delay caused in filing the service appeal is not intentional. The appellant, after loss of job and after becoming hand to mouth, became mentally ill. And the other factors involved behind the delay are the promises of the High ups that his (appellant's) grievances would be redressed.

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5. That the appellant has a very good case on merits as no final show cause notice was issued to the appellant before awarding major punishment.
6. That this honorable court has vast power to accept the instant application.

IT IS THEREFORE PRAYED THAT BY ANY WAY, IF SERVICE APPEAL IS FOUND TIME BARRED THEN THE DELAY MAY KINDLY BE CONDONE.

Dated; 01/10/2024.

Your humble Applicant



Ejaz Khan

Through Counsel



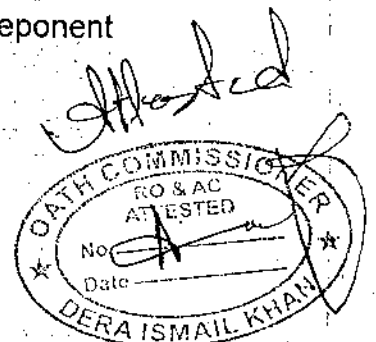
Muhammad Abdullah Baloch
(Advocate Supreme Court)

AFFIDAVIT

I, Ejaz Khan, applicant, do hereby solemnly affirm and declare on OATH that the contents of the application is true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.



Deponent



Attested to be
a True Copy

کاپی حقیقی اور درست ہے

Registrar General of Pakistan

10105142663

12101-7457863-9

PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN




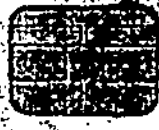
Name: Ejaz Khan

Father Name: Muhammad Iqbal

Gender: M Country of Issue: Pakistan

Identity Number: 12101-7457863-9	Date of Birth: 15-02-1991
Date of Issue: 25-09-2022	Date of Expiry: 25-09-2032

Holder's Signature

Annexure - A

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(11)

Annexure - A/1

Khyber Pakhtunkhwa Police

Card No.0106650



EJAZ KHAN
Constable



[Signature]

Issuing Authority

District Police Office, D.I. Khan

CNIC #	1210174578639
Date of Birth	15-02-1991
Date of Issue	10-03-2022
Date of Expiry	09-03-2025
Emergency Contact#	03468887480
Address	Barkat Abad colony D.I. Khan



1. In the event of loss the card holder should report to the nearest police station.
2. If found, please drop into the nearest letter box.
3. Contact us. 091-9210457

[Signature]
Attested to be
a True Copy



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C/S No.158/2024

OFFICE OF THE *Annexure B*
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN

No. 1980 /EC,

Dated

09/14/2024

CHARGE SHEET

I, NASIR MEHMOOD, DISTRICT POLICE OFFICER, DIKHAH, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am. of the opinion that you Constable Ijaz Khan No.2076, rendered yourself liable to be proceeded against departmentally as you have committed the following act/omissions.

You while posted at PS Band Kurai DIKhan, you being reported to be involved in smuggling of Iranian Oil vide W/RPO DIKhan Order Findst: No.2249-51/ES, dated 08.04.2023. Above commission/omission falls in the purview of gross misconduct and renders you liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

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

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

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

4. A statement of allegation is enclosed.

Nasir Mehmood
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN

Nasir Mehmood
Attested to be
a True Copy

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a) Reported by _____
b) Applicant _____ 3.9.2024
c) Copying fee deposited on _____
d) Judgment sent for recording on _____
e) No of words copied _____
f) Copying fee _____ Ex-FC = Ijaz Khan
g) Section _____
h) Urgent by _____ No 22076/1
i) Name of _____
j) Copy sent on _____ 3.9.2024
k) Copy _____ 3.9.2024
l) Date of _____ For Approval

OFFICE OF THE
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN



No. 1170 /EC,

Dated

DISCIPLINARY ACTION

9/4/2024

I, NASIR MEHMOOD, DISTRICT POLICE OFFICER, DIKHAN as competent authority, under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) am of the opinion that you Head Constable Ijaz Khan No.2076/L, rendered yourself liable to be proceeded against departmentally as you have committed the following acts/omissions.

STATEMENT OF ALLEGATIONS

1. You while posted at PS Band Kural DIKhan, you being reported to be involved in smuggling of Iranian Oil vide W/RPO DIKhan Order Endst: No.2249-51/ES, dated 08.04.2023, Above commission/omission falls in the purview of gross misconduct and renders you liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations SP City DIKHAN is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

Nasir Mehmood
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN

No. 1151-82/EC,

dated

9/4/2024

Copy of above to:-

1. The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975 with the direction to submit his finding report within 03-days positively.
2. The Accused officer, with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

Nasir Mehmood
Attested to be
a True Copy



OFFICE OF THE
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN
(0916-0200062 Fax # 0210293)

Annexure-D

14

No. 2215 /EC

dated D.I.Khan the

19/04/2024

CORRIGENDUM

Reference this office charge sheet Nos notes against each their names so far it relates to the posting of the said Upper/Lower subordinates may be read as per given in Column No.03, of the below mentioned table:

01 Sl#	02 Name & No.	03 Posting	04 Charge Sheet No.
1	SI Atta Ullah No.86/D	SHO PS Daraban DIKhan w.e from 11.06.2020 to 23.04.2021 & w.e from 05.09.2023 to 26.11.2023	No.1971-73/EC, dated 09.04.2024
2	SI Rehmat Ullah No.113/D	DSP Office Darazinda w.e from 30.11.2023 to 07.04.2024	No.1974-76/EC, dated 09.04.2024
3	IIC Kram Ullah No.1015	Incharge Darazinda Check Post PS Daraban w.e from 23.02.2024 to 07.03.2024	No.1977-79/EC, dated 09.04.2024
4	HC Ijaz Khan No:2076/L	I/C Check Post Mughal Kot w.e from 25.10.2023 to 15.12.2023	No.1980-82/EC, dated 09.04.2024

Totale 50 days deuty's.

[Signature]
District Police Officer
Dera Ismail Khan

No. 2216-21 /EC

dated

19/04/2024

Copy of above is submitted to:-

1. The Regional Police Officer DIKhan for favor of information w/r to his office letter No.2249-51/ES, dated 08.04.2023.
2. The Superintendent of Police, City DIKhan with the direction to finalize the enquiries in stipulated period of time.
3. All above mention accused Upper/Lower Subordinates.

[Signature]
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a True Copy

[Signature]
District Police Officer
Dera Ismail Khan

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a True Copy

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Annexure - E

(15)

1980/82

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س: کیا یہ بات درست ہے کہ آپ کی ملی جمعیت کے 2019 سالہ سالانہ رپورٹ کی ڈیٹا/ڈیٹیل اور آن لائن ڈیٹا خفیہ رہے مغل جیک ایسٹ سے فوڈز ایگے ایک فزڈ سے زیادہ کسی بھی راستہ سے گزارنے کے بغیر

ج: حمایتیں اس بات میں کسی قسم کی مداخلت نہیں پائی جاتی مگر رات کے پورے وقت میں آکر کوئی گاڑی کچے راستے کا استعمال کرتے ہوئے لوگوں کا نہیں علم ہے۔ تاہم مقامی علاقہ جو کہ 2019 میں KPR میں شام ہوا ان کے مشن انہیں ہم سے اوزر جٹ کرتے کہ معاہدہ کے تحت مقامی لوگ 15 سال تک کسی بھی قسم کے ٹیکس سے مستثنیٰ ہیں اور آپ مقامی لوگوں کو کسی بھی سامان کو جو کہ منتقلیات، اسلیم کے علاوہ سامان از شام (ایر ای ڈیٹیل و NCP سامان ضرورت) کو نہیں ملے سکتے جب تک ان کا کیا اور ان کو کیا کہ یہ باتیں افغان بالائے سے کریں یہ حکم کے پاس ہیں اور ہم یہ خود کوئی فیصلہ نہیں کر سکتے ہیں یہ مقامی لوگ افغان بالائے کو فزڈ کر کے شکل میں ملے اور ان سے فوڈ ڈیٹیل کو اسٹاک کیا ہے۔ لیکن افغان بالائے ہمیں کوئی مداخلت نہیں دیں ہیں یہ اکثر مقامی لوگ اور مشن ان اکثر جیک ایسٹ کے سامنے دیکھنا اور رڈ بلاک کرتے تھے جس کی بنا پر اکثر دیگر مسافروں کو مشکلات درپیش آتی تھیں اور ہم اکثر مشن کرتے تھے جس کی بنا پر مقامی سطح پر مخالفت پائی جاتی تھی اور ملکہ کرنے کو آپ ہمارے مقامی میں آپ بھی ہمیں نقصان پہنچانے میں۔ لیکن اس کے باوجود

Attested to be a True Copy

میشنل کے خلاف کارروائی اور فزڈ ہوجوئے سلسلہ
18/4/2024



Attested to be

18/11/1954

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Annexure - F
OFFICE OF THE
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN

(1986) 9280062 Fax (0986) 9280293

2883/EC

Dated: 25/11/2024

ORDER

This order is aimed to dispose-off the departmental proceedings conducted against Head Constable Ijaz Khan No.2076/L, of this district Police, under the Khyber Pakhtunkhwa, Police-Rules, 1975 (amendment-2014) vide this office C/S No.158/2024 on the following allegations.

He while posted as I/C Check Post Mughal Kot DIKhan, he being reported to be involved in smuggling of Iranian Oil vide W/RPO DIKhan Order Endst: No.2249-51/ES, dated 08.04.2023. Above commission/omission falls in the purview of gross misconduct, and renders him liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

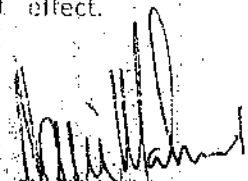
Mohammad Ishaq Acting Superintendent of Police City DIKhan was appointed as Enquiry Officer with the directions to conduct proper Departmental Enquiry against him and submit finding report in which he stated that the delinquent Head Constable is found guilty of the charges leveled against him. Enquiry officer recommended to award him Major Punishment.

Keeping in view of findings report of the Enquiry Officer and conduct of the delinquent Head Constable, the undersigned came to the conclusion that the charges leveled against him have been proved beyond any shadow of doubt.


Therefore, in exercise of powers vested upon undersigned, I, NASIR MAHMOOD, PSP District Police Officer DIKhan, hereby awarded him "Major Punishment of Dismissal from Service" with immediate effect.

Order Announced

OB No. 7491
Dated: 25/11/2024


NASIR MAHMOOD PSP
District Police Officer
Dera Ismail Khan

- (a) Register No. 29
- (b) Application No. 2076/L
- (c) Copy for Departmental Enquiry
- (d) Judgment No. 2249-51/ES
- (e) No. of 2076/L
- (f) Charge = Ijaz Khan
- (g) Search No. 2076/L
- (h) Urgency No. 2076/L
- (i) Name of 2076/L
- (j) Copy No. 2076/L
- (k) Copy No. 2076/L
- (l) Serial No. 2076/L


Attested to be
a True Copy

To,

18

Annexure - G
DT No - 1768

20-5-024

The Regional Police Officer,
District Dera Ismail Khan.

SUBJECT:-

DEPARTMENTAL APPEAL AGAINST ORDER NO. 2883/EC DATED 25/04/2024 BEARING OB NO. 7491 DATED 25/04/2024 PASSED BY DISTRICT POLICE OFFICER, DERA ISMAIL KHAN VIDE WHICH APPELLANT HAS BEEN DISMISSED FROM SERVICE FOR NO GOOD REASONS.

Respected Sir,

The appellant aggrieved from the impugned order of dismissal submits following for yours kind and sympathetic consideration:-

1. That the appellant was mered in the Police Department in the wake of merger of erstwhile levies & Khasadar force.
2. That the appellant always worked efficiently to the entire satisfaction of superior officers.
3. That while posted as I/C check post, the appellant showed record recovery of Iranian oil and other NCP goods which was handed over the custom intelligence as per rules / instructions. Copy is enclosed.
4. That in the meanwhile no complaint was received against the appellant.
5. That to the utmost surprise, appellant was suspended alongwith other officers / officials by the RPO DIKhan vide order bearing No. 2249/ES dated 08/04/2024. Copy enclosed.
6. That consequent upon suspension, the District Police Officer, Dera Ismail Khan issued charge sheet alongwith statement of allegations bearing No. 1980/EC dated 09/04/2024. Copy enclosed.
7. In the charge sheet allegations were leveled that while posted at Band Kurai, DIKhan, were involved in the smuggling of Iranian oil.
8. That SP City DIKhan was appointed as inquiry officer to conduct inquiry in accordance with provisions of Police Rules, 1975.
9. That a corrigendum vide No. 2215/EC dated 19/04/2024 was issued and period of posting of appellant was mentioned w.e from 25/10/2023 to 15/12/2023 as I/C Check Post, Mughal Kot.
10. That appellant submitted comprehensive reply to the charge sheet rebutting the allegations leveled and

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- explaining all the good performances and recoveries of Iranian oil / NCP worth billions of rupees.
11. That in sheer violation of Police Rules, ESTA Code and principles of natural justice, appellant was condemned unheard and dismissal from service vide impugned order dated 25/04/2024.
 12. That no codal formalities of proper inquiry were complied with.
 13. That no statement of any witness was recorded in the presence of appellant.
 14. That no opportunity of defense / cross examination was provided to appellant.
 15. That a copy of finding report was also not provided to the appellant.
 16. That no final show cause was issued nor opportunity of personal hearing was provided which as per kind verdicts of superior Courts and Honourable Tribunal are mandatory.
 17. That the allegations are general in nature and vague and ambiguous.
 18. That during inquiry the good performance and recoveries of NCP goods / Iranian Oil worth billion rupees has been overlooked.
 19. That allegations are based on mis-information / disinformation.
 20. That appellant has been made scapegoat to save the blue eyed officers / officials.
 21. That appellant also request for personal hearing.

In view of above submissions, it is humbly prayed that on acceptance of instant appeal, the impugned order of dismissal may graciously be set aside and appellant reinstated into service from date of suspension, with all back benefits.

Your's faithfully,

Dated:13/05/2024

[Signature]
Ex.HC Ijaz Khan
No. 2076/L
Mobile#0346-7878646

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OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

☎ 0966-9280291 Fax # 9280290
dated D.I.Khan the

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flexible - H
1215
Dated 08/08/2024
DPO OFFICE D.I.KHAN
01/08/2024

No. 5190 /S
ORDER

1. This order disposes off departmental appeal filed by Ex-Constable Ijaz Khan No. 2076/L of District Police D.I.Khan, against the order of Major Punishment of (Dismissal from Service), passed by the DPO D.I.Khan, vide his office OB No. 749 dated 25.04.2024 on the following allegations:

2. "He while posted as HC Check post Mughal Kot Dikhan, he being reported to involved in smuggling of Iranian Oil vide RPO DIKhan Order Endst No. 2248-51/ES dated 08.04.2024. Above commission/omission fell in the purview of gross misconduct and renders him liable to be punished under Khyber Pakhtunkhwa Police Rule 1975 amended 2014."

3. DPO D.I.Khan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Muhammad Ishaq Acting Superintendent of Police City DIKhan who in his finding, report in which he stated that delinquent HC is found guilty of the charges levelled against him and recommended to award him Major Punishment.

4. On the recommendation of the inquiry officer the appellant was awarded Major Punishment of "Dismissal from service" by the DPO D.I.Khan vide his office OB No. 749 dated 25.04.2024.

5. Heard in person on 01.08.2024, in orderly room by undersigned and his service record & finding of the inquiry officer are also perused. He was given ample opportunity of due process and natural justice against the charges under which DPO DIKhan has awarded him Major Punishment "Dismissal from Service". His written as well as verbal response is found to be unsatisfactory and not plausible. The undersigned fully agreed with the recommendations of inquiry officer.

6. Keeping in view the above, I, NASIR MEHMOOD SATTI, PSP, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975, Amended 2014, do not intend to take a lenient view, therefore **REJECT** his appeal being meritless and uphold the order of Major Punishment of (Dismissal from Service), passed by District Police Officer D.I.Khan vide his OB No. 749 dated 25.04.2024, with immediate effect.

6. Order Announced.

(Signature)
(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan

No. 5191 /S

Copy of above is sent to the DPO D.I.Khan with reference to his office letter No. 3762/EC dated 20.06.2024, (Encl: Service Roll & Fauji Missal).

(Signature)
(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan

OB 1395
dt 07-8-24 OB/EC/CHK
for inspection

District Police Officer
Dera Ismail Khan

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(a) Applicant	Ijaz Khan
(c) Copying	
(d) Issued	
(e) No.	
(f) Copy	EX-PC - Ijaz Khan
(g) Branch	
(h) Urgency	No = 2076/L
(i) Name	
(j) Copy	16.8.2024
(k) Copy	16.8.2024
(l) Other	For Appeal

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for Legal Services/Market

order copy may be
provided if approved.
please

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2016 07/15/16

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1395 08 15 2016

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ESTABLISHMENT BRANCH
DATE: 08/15/2016
OFFICE: DIRMAN

(21)

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Annexure

To:
The Inspector General of Police (IGP),
Khyber Pakhtunkhwa,
Peshawar.

SUBJECT:-

REVIEW / REVISION PETITION UNDER RULE 11-A POLICE RULES 1975, AMENDED 2014, AGAINST REGIONAL POLICE OFFICER (RPO) ORDER BEARING NO. 5190/ES DATED 01/08/2024 / OB NO. 1395 DATED 07/08/2024 WHEREBY DEPARTMENTAL APPEAL OF PETITIONER HAS BEEN REJECTED AND DISTRICT POLICE OFFICER, DIKHAN ORIGINAL ORDER DATED 25/04/2024 HAS BEEN UPHOLD, VIDE WHICH PETITIONER WAS DISMISSAL FROM SERVICE.

Respected Sir,

Aggrieved from the original order dated 25/04/2024 and departmental appeal order dated 01/08/2024, the petitioner submits the following for yours favourable and sympathetic consideration:-

1. That the appellant was mered in the Police Department in the wake of merger of erstwhile levies & Khasadar force.
2. That the appellant always worked efficiently to the entire satisfaction of superior officers.
3. That while posted as I/C check post, the appellant showed record recovery of Iranian oil and other NCP goods which was handed over the custom intelligence as per rules / instructions. Copy is enclosed.
4. That in the meanwhile no complaint was received against the appellant.
5. That to the utmost surprise, appellant was suspended alongwith other officers / officials by the RPO Dikhan vide order bearing No. 2249/ES dated 08/04/2024. Copy enclosed.
6. That consequent upon suspension, the District Police Officer, Dera Ismail Khan

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- issued charge sheet alongwith statement of allegations bearing No. 1980/EC dated 09/04/2024. Copy enclosed.
7. In the charge sheet allegations were leveled that while posted at Band Kurai, DIKhan, were involved in the smuggling of Iranian oil.
 8. That SP City DIKhan was appointed as inquiry officer to conduct inquiry in accordance with provisions of Police Rules, 1975.
 9. That a corrigendum vide No. 2215/EC dated 19/04/2024 was issued and period of posting of appellant was mentioned w.e. from 25/10/2023 to 15/12/2023 as I/C Check Post, Mughal Kot.
 10. That appellant submitted comprehensive reply to the charge sheet rebutting the allegations leveled and explaining all the good performances and recoveries of Iranian oil / NCP worth billions of rupees.
 11. That in sheer violation of Police Rules, ESTA Code and principles of natural justice, appellant was condemned unheard and dismissal from service vide impugned order dated 25/04/2024.
 12. That ~~petitioner~~ lodged departmental appeal to Regional Police Officer (RPO), DIKhan on 13/05/2024.
 13. That RPO, DIKhan vide impugned order dated 01/08/2024 has rejected the departmental appeal of petitioner and upheld the punishment of dismissal from service passed by DPO, DIKhan vide order dated 25/04/2024.
 14. That the impugned order of RPO, DIKhan dated 01/08/2024 and of DPO, DIKhan dated 25/04/2024 are against law, rules and facts on record and not maintainable on the following grounds:-

GROUND FOR REVIEW / REVISION:-

1. That as per allegations, petitioner while posted at Check post Mughal Kot from 25/10/2023 to 15/12/2023 was involved in

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the smuggling of Iranian oil, the vehicles have crossed the borderline from Iran as well as through province of Balochistan, but departmental inquiry is silent as to how it was made possible to ply the vehicles unchecked.

2. That the allegations are hearsay, general in nature and no such vehicle reported to be checked and recovered at downward districts, check posts or any security agency.
3. That the entire proceedings were completed in haphazard, without following rules and procedure and harsh punishment was inflicted upon petitioner.
4. That no solid evidence / proof of involvement was produced during inquiry.
5. That inquiry proceeding was not transparent and petitioner was made a scapegoat.
6. That competent authority has not appreciated the good performance and recoveries of NCP goods as well as Iranian oils during petitioner posting.
7. That prior to issue of charge sheet, no notice, explanation or advise was served upon petitioner regarding any complaint of such smuggling.
8. That no codal formalities of proper inquiry were complied with.
9. That no statement of any witness was recorded in the presence of appellant.
10. That no opportunity of defense / cross examination was provided to appellant.
11. That a copy of finding report was also not provided to the appellant.
12. That no final show cause was issued nor opportunity of personal hearing was provided which as per kind verdicts of superior Courts and Honourable Tribunal are mandatory.
13. That the allegations are general in nature and vague and ambiguous.
14. That during inquiry the good performance and recoveries of NCP goods / Iranian Oil worth billion rupees has been overlooked.

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15. That allegations are based on mis-information / disinformation.
16. That appellant has been made scapegoat to save the blue eyed officers / officials.
17. That appellant also request for personal hearing.

In view of above submissions, it is humbly prayed that on acceptance of instant Review / Revision Petition, both the impugned orders of DPO, DIKhan and RPO, DIKhan may very graciously be set aside and petitioner reinstated into service from date of dismissal, with all back benefits.

Your's faithfully,

Dated: 19/08/2024



Ex. Constable Ijaz Khan
No. 3076/L
Mobile#0346-7878646

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12032053-7
010 K2032053-7



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CN: 10049110118

CASH

STAFF: 100317

Route: X24104

Name: LAZ KHAN
Phone: 03467870346
Address: HARKAT ABAD D I KHAN

Name: HAZIQA HANISAH B
Phone: 0610242424
Address: POLICE CPD OFFICE PUSKASAR

Service Charge	204.0
Fuel Surcharges	26.0
Other Amount	0.0
VAS	8
Insurance CHG	0
Admin Fee CHG	0
Destination Fee CHG	0
Proration	0
TOTAL	238.0

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original

For Bank & Institution Use
and Remittance Purposes
The Bank has not verified the
signature of the customer.
Date: 2023/11/15 10:00 AM
Branch: 100317

27

Origin NTN P2832053-7
Destination NTN K2832053-7



CN: 1069918018

Service Type

G 0

Invoice Date

CASH 2024-08-19 13:30

Invoice No

DIR-PEW 1Pcs - .5
Staff: 100317 Route: X24104

Customer Name

Name : IJAZ KHAN
Phone : 03467878646
Address : BARKAT ABAD D I KHAN

Customer Address

Name : INSPECTOR GENERAL OF
Phone : 09192456585
Address : POLICE CPQ OFFICE PESHAWAR

Customer Phone

DOC

Customer Address

Rs. 0

Payment Details

Service CHG	284.0
Fuel Surcharge	26.0
Other Amount	0.0
VAS	8
Insurance CHG	0
Origin Tax PST	52
Destination Tax RPST	0
Premium	0
TOTAL	370.0

Invoice Total

Invoice Total

CN Print Charges

Invoice Total

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J. Bhowal
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Annex J
Annexure-J

NCP ARTICLES HANDED OVER TO INTELLIGENCE CUSTOM
From 12.03.2023 to 30.11.2023

Sr	Name of Item	DD No. Date, Police Station	Quantity of Recovered Article	Total Amount (Approximate)	Handed Over Dated
1.	Vehicle Tyres	DD No. 00, Dated: 21.05.2023, PS/Darazinda	34-Nos	100,000/- ✓	21.05.2023
2.	Shoppers	DD No. 06, Dated: 21.05.2023, PS/Darazinda	73-Nos Bags	5,00,000/- ✓	21.05.2023
3.	NCP Cloth	DD No. 08, Dated: 21.05.2023, PS/Darazinda	05-Nos Rolls	100,000/- ✓	21.05.2023
4.	Submersible Pumps	DD No. 08, Dated: 21.05.2023, PS/Darazinda	10-Nos	100,000/- ✓	21.05.2023
5.	China Salt	DD No. 06, Dated: 21.05.2023, PS/Darazinda	53-Nos Bags	400,000/- ✓	21.05.2023
6.	Paint (Colour)	DD No. 06, Dated: 21.05.2023, PS/Darazinda	41-Nos Cartons	100,000/- ✓	21.05.2023
7.	Varnish Polish	DD No. 06, Dated: 21.05.2023, PS/Darazinda	15-Nos Cartons	100,000/- ✓	21.05.2023
8.	Crockery Items	DD No. 06, Dated: 21.05.2023, PS/Darazinda	10-Nos Cartons	100,000/- ✓	21.05.2023
9.	Vehicle Tyres	DD No. 08, Dated: 10.08.2023, PS/Darazinda	176-Nos	30,00,000/- ✓	10.08.2023
10.	NCP Diesel	DD No. 05, Dated: 15.08.2023, PS/Darazinda	1000-Ltrs	200,000/-	15.08.2023
11.	NCP Diesel	DD No. 16, Dated: 06.09.2023, PS/Mughal Kot	180,000-Ltrs	45,900,000/-	06.09.2023
12.	Vehicle Tyres	DD No. 11, Dated: 16.09.2023, PS/Mughal Kot	141-Nos.	500,000/- ✓	16.09.2023
13.	Cigarette	DD No. 11, Dated: 16.09.2023, PS/Mughal Kot	06-Nos. Cartons	500,000/- ✓	16.09.2023
14.	Shoppers	DD No. 11, Dated: 16.09.2023, PS/Mughal Kot	08-Nos. Rolls	100,000/- ✓	16.09.2023
15.	Spare Parts (Mix)	DD No. 11, Dated: 16.09.2023, PS/Mughal Kot	20-Nos. Cartons	200,000/- ✓	16.09.2023
16.	NCP Cloth	DD No. 06, Dated: 26.09.2023, PS/Mughal Kot	1000-Nos. Rolls	100,00,000/-	26.09.2023
17.	Vehicle Tyres	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot	13-Nos	200,000/- ✓	14.10.2023
18.	Dry Milk	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot	29-Nos Cartons	600,000/- ✓	14.10.2023
19.	Shoppers	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot	72-Nos Bags	300,000/- ✓	14.10.2023
20.	NCP Cloth	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot	52-Nos Rolls	12,00,000/- ✓	14.10.2023
21.	Crockery Items	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot	109-Nos Cartons	20,00,000/- ✓	14.10.2023
22.	Thermos	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot	30-Nos Cartons	200,000/- ✓	14.10.2023

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23.	Marble Tiles	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot.	25-Nos Cartons	10,00,000/- ✓	14.10.2023
24.	Spare Parts (Mix)	DD No. 15, Dated: 14.10.2023, PS/Mughal Kot.	02-Nos Cartons	400,000/- ✓	14.10.2023
25.	Computer Accessories	DD No. 16, Dated: 14.10.2023, PS/Mughal Kot.	02-Nos Bags	100,000/- ✓	14.10.2023
26.	Shampoo	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	03-Nos Cartons	100,000/- ✓	18.10.2023
27.	Spare Parts (Mix)	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	85-Nos Cartons	11,00,000/- ✓	18.10.2023
28.	Vehicle Tyres	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	10-Nos	200,000/- ✓	18.10.2023
29.	Dry Milk	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	02-Nos Bags	100,000/- ✓	18.10.2023
30.	Cigarette	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	01-No Carton	100,000/- ✓	18.10.2023
31.	Submersible Pumps	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	100-Nos	20,00,000/- ✓	18.10.2023
32.	China Salt	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	04-Nos Bags	100,000/- ✓	18.10.2023
33.	Inverter / Converter	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	01-No	100,000/- ✓	18.10.2023
34.	Mobile Batteries	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	01-No Carton	100,000/- ✓	18.10.2023
35.	Submersible Pump Spare Parts	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	12-Nos Carton	400,000/- ✓	18.10.2023
36.	Dry Fig (خشک میوه)	DD No. 12, Dated: 18.10.2023, PS/Mughal Kot.	20-No Bags	200,000/- ✓	18.10.2023
37.	Computer Papers Mix	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	12-Nos Bags	100,000/- ✓	21.10.2023
38.	Mobil Oil	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	37-Nos Carton	500,000/- ✓	21.10.2023
39.	J.M	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	40-Nos	200,000/- ✓	21.10.2023
40.	Vehicle Tyres	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	31-Nos	500,000/- ✓	21.10.2023
41.	Sewing Machine	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	08-Nos	100,000/- ✓	21.10.2023
42.	China Salt	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	09-Nos Bags	200,000/- ✓	21.10.2023
43.	Inverter / Converter	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	05-Nos	300,000/- ✓	21.10.2023
44.	Soap	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	05-Nos Cartons	100,000/- ✓	21.10.2023
45.	Shampoo	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	18-Nos Cartons	500,000/- ✓	21.10.2023
46.	Cigarette	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	01-No Carton	100,000/- ✓	21.10.2023
47.	Perfume / Spray	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	08-Nos Cartons	100,000/- ✓	21.10.2023

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48.	Medicine (Mix)	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	02-Nos Cartons	100,000/- ✓	21.10.2023
49.	Lotion	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	02-Nos Cartons	100,000/- ✓	21.10.2023
50.	Spare Parts (Mix)	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	01-No Carton	100,000/- ✓	21.10.2023
51.	Face Wash (Mix)	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	17-Nos Cartons	200,000/- ✓	21.10.2023
52.	NCP Cloth	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	30-Nos Rolls	200,000/- ✓	21.10.2023
53.	Dry Milk	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	05-Nos Bags	100,000/- ✓	21.10.2023
54.	Gas Burner	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	02-Nos	100,000/- ✓	21.10.2023
55.	Shoppers	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	02-Nos Bags	100,000/- ✓	21.10.2023
56.	Vaseline Lotion	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	40-Nos Cartons	100,000/- ✓	21.10.2023
57.	Slippers / Boots	DD No. 12, Dated: 21.10.2023, PS/Mughal Kot.	04-Nos Cartons	100,000/- ✓	21.10.2023
58.	Vehicle Tyres	DD No. 11, Dated: 23.10.2023, PS/Mughal Kot.	32-Nos	800,000/- ✓	23.10.2023
59.	Cigarette	DD No. 11, Dated: 23.10.2023, PS/Mughal Kot.	01-No Carton	100,000/- ✓	23.10.2023
60.	Sewing Machine	DD No. 11, Dated: 23.10.2023, PS/Mughal Kot.	06-Nos	100,000/- ✓	23.10.2023
61.	Spare Parts (Mix)	DD No. 11, Dated: 23.10.2023, PS/Mughal Kot.	01-No Carton	100,000/- ✓	23.10.2023
62.	Slippers / Boots	DD No. 11, Dated: 23.10.2023, PS/Mughal Kot.	06-Nos Cartons	200,000/- ✓	23.10.2023
63.	NCP Diesel	DD No. 14, Dated: 24.10.2023, PS/Mughal Kot.	12000-Ltrs	35,00,000/-	24.10.2023
64.	Vehicle Tyres	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	46-Nos	200,000/- ✓	04.11.2023
65.	Cream (Jar/Jar)	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	94-Nos Cartons	200,000/- ✓	04.11.2023
66.	China Salt	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	24-Nos Bags	500,000/- ✓	04.11.2023
67.	Shampoo	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	03-Nos Cartons	100,000/- ✓	04.11.2023
68.	Thermos	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	02-Nos Cartons	100,000/- ✓	04.11.2023
69.	NCP Diesel	DD No. 12, Dated: 04.11.2023, PS/Mughal Kot.	8500-Ltrs	25,00,000/-	04.11.2023
70.	Lotion	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	02-Nos Cartons	100,000/- ✓	04.11.2023
71.	Cashew (2K)	DD No. 17, Dated: 04.11.2023, PS/Mughal Kot.	04-Nos Cartons	200,000/- ✓	04.11.2023
72.	Dry Milk	DD No. 20, Dated: 10.11.2023, PS/Mughal Kot.	23-Nos Bags	500,000/- ✓	10.11.2023

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71	Cigarettes	DD No. 20 Dated: 10/11/2023 PS/Mughal Kot	01 No Carton	100,000/-	✓	10/11/2023
72	Shoppers	DD No. 20 Dated: 10/11/2023 PS/Mughal Kot	01 No Bags	200,000/-	✓	10/11/2023
73	MCP Cloth	DD No. 20 Dated: 10/11/2023 PS/Mughal Kot	09 Nos Rolls	400,000/-	✓	10/11/2023
74	Submersible Pumps	DD No. 20 Dated: 10/11/2023 PS/Mughal Kot	02 Nos	100,000/-	✓	10/11/2023
75	Gold (1)	DD No. 20 Dated: 10/11/2023 PS/Mughal Kot	05 Nos Cartons	100,000/-	✓	10/11/2023
76	Vehicle Tyres	DD No. 14 Dated: 21/11/2023 PS/Mughal Kot	35 Nos	300,000/-	✓	21/11/2023
77	MCP CDM	DD No. 14 Dated: 21/11/2023 PS/Mughal Kot	02 Nos Rolls	500,000/-	✓	21/11/2023
78	China Salt	DD No. 14 Dated: 21/11/2023 PS/Mughal Kot	02 Nos Bags	10,00,000/-	✓	21/11/2023
79	Milk Bakery Items	DD No. 14 Dated: 21/11/2023 PS/Mughal Kot	01 No Carton	100,000/-	✓	21/11/2023
80	Transport (1)	DD No. 14 Dated: 21/11/2023 PS/Mughal Kot	05 Nos Cartons	100,000/-	✓	21/11/2023
81	Shippers / Books	DD No. 14 Dated: 21/11/2023 PS/Mughal Kot	07 Nos Cartons	200,000/-	✓	21/11/2023
82	Vehicle Tyres	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	30 Nos	10,00,000/-	✓	23/11/2023
83	Instant Yeast (2)	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	150 Nos Cartons	10,00,000/-	✓	23/11/2023
84	Dry Milk	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	150 Nos Bags	10,00,000/-	✓	23/11/2023
85	Cigarettes	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	09 Nos Cartons	500,000/-	✓	23/11/2023
86	Shoppers	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	18 Nos Bags	500,000/-	✓	23/11/2023
87	China Salt	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	04 Nos Bags	10,00,000/-	✓	23/11/2023
88	Beep	DD No. 20 Dated: 23/11/2023 PS/Mughal Kot	74 Nos Cartons	10,00,000/-	✓	23/11/2023

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Attested to be
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Sl No	Name of Items	QD No. Date	Quantity of Resealed Article	Total Amount (Approximate)	Handed Over Dated
1	Cable Salt	QD No. 07 Dated: 04.08.2023	25 Nos	100,000/-	04.08.2023
2	Stack Eyed Pen (1)	QD No. 07 Dated: 04.08.2023	20 Nos	100,000/-	04.08.2023
3	Shampoo	QD No. 07 Dated: 04.08.2023	08 Nos	100,000/-	04.08.2023
4	Chassis (2)	QD No. 07 Dated: 04.08.2023	10 Nos	100,000/-	04.08.2023
5	Ice Bakery Items	QD No. 07 Dated: 04.08.2023	230 Nos	100,000/-	04.08.2023
6	Shampoo	QD No. 07 Dated: 04.08.2023	10 Nos	100,000/-	04.08.2023
7	Cream (4/1)	QD No. 07 Dated: 04.08.2023	60 Nos	100,000/-	04.08.2023
8	Shoppers	QD No. 07 Dated: 04.08.2023	40 Nos	100,000/-	04.08.2023
9	Towel (1)	QD No. 07 Dated: 04.08.2023	05 Nos	100,000/-	04.08.2023
10	Bed Matt (1)	QD No. 08 Dated: 28.08.2023	100 Nos	20,00,000/-	01.07.2023
11	NCP Vehicles	QD No. 08 Dated: 01.07.2023	BCL-504 (Vtd)	12,00,000/-	05.07.2023
12	Dry Milk	QD No. 10 Dated: 14.08.2023	20 Nos	400,000/-	14.08.2023
13	Shoppers	QD No. 10 Dated: 14.08.2023	53 Nos	400,000/-	14.08.2023
14	NCP Cloth	QD No. 10 Dated: 14.08.2023	110 Nos	300,000/-	14.08.2023
15	Boop	QD No. 10 Dated: 14.08.2023	87 Nos	400,000/-	14.08.2023
16	Vehicle Tyres	QD No. 13 Dated: 17.08.2023	70 Nos	10,00,000/-	17.08.2023
17	Vehicle Tyres	QD No. 12 Dated: 28.08.2023	105 Nos	500,000/-	28.08.2023
18	Dry Milk	QD No. 12 Dated: 28.08.2023	30 Nos	500,000/-	28.08.2023
19	Cigarettes	QD No. 12 Dated: 28.08.2023	35 Nos	500,000/-	28.08.2023
20	Shoppers	QD No. 12 Dated: 28.08.2023	200 Nos	500,000/-	28.08.2023
21	Shoppers	QD No. 12 Dated: 28.08.2023	200 Nos	500,000/-	28.08.2023
22	Shoppers	QD No. 12 Dated: 28.08.2023	40 Nos	400,000/-	28.08.2023
23	Shoppers	QD No. 12 Dated: 28.08.2023	52 Nos	500,000/-	28.08.2023
24	Vehicle Tyres	QD No. 14 Dated: 08.09.2023	08 Nos	200,000/-	09.09.2023

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NCP ARTICLES HANDED OVER TO PREVENTIVE CUSTOM

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A/I Annex Annex Annex Annex Annex

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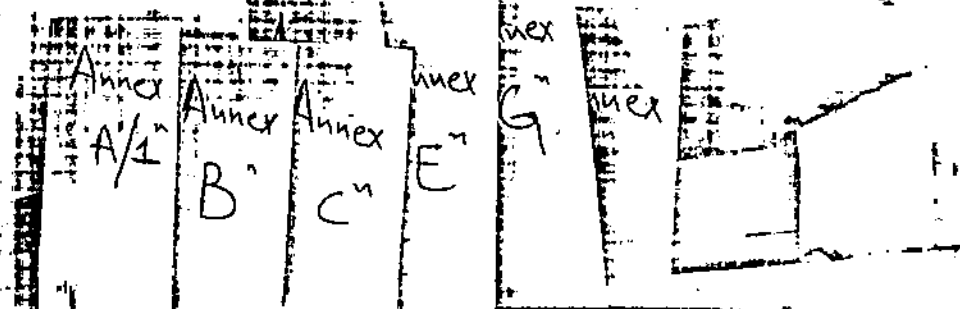
24.	Chocolate	DD No. 14, Dated: 09.09.2023, PS/Mughal Kot	10-Nos Cartons	100,000/- ✓	09.09.2023
25.	Shoppers	DD No. 14, Dated: 09.09.2023, PS/Mughal Kot	08-Nos Bags	100,000/- ✓	09.09.2023
26.	NCP Cloth	DD No. 14, Dated: 09.09.2023, PS/Mughal Kot	08-Nos Rolls	200,000/- ✓	09.09.2023
27.	Inverter / Converter	DD No. 14, Dated: 09.09.2023, PS/Mughal Kot	06-Nos	300,000/- ✓	09.09.2023
28.	Sewing Machine	DD No. 14, Dated: 09.09.2023, PS/Mughal Kot	47-Nos	500,000/- ✓	09.09.2023
29.	Vehicle Tyres	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	25-Nos	400,000/- ✓	13.10.2023
30.	Instant Yeast ()	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	04-Nos Cartons	500,000/- ✓	13.10.2023
31.	Dry Milk	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	19-Nos Bags	400,000/- ✓	13.10.2023
32.	Cigarette	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	01-No Carton	100,000/- ✓	13.10.2023
33.	Shoppers	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	77-Nos Bags	400,000/- ✓	13.10.2023
34.	NCP Cloth	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	02-Nos Rolls	400,000/- ✓	13.10.2023
35.	Shampoo	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	10-Nos Cartons	200,000/- ✓	13.10.2023
36.	Soap	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	02-Nos Cartons	100,000/- ✓	13.10.2023
37.	Waistcoat	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	02-Nos Bags	100,000/- ✓	13.10.2023
38.	Medicine (Mix)	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	02-Nos Cartons	200,000/- ✓	13.10.2023
39.	Spare Parts (Mix)	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	03-Nos Cartons	500,000/- ✓	13.10.2023
40.	Balugan	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	04-Nos Bags	200,000/- ✓	13.10.2023
41.	Door Locks	DD No. 19, Dated: 13.10.2023, PS/Mughal Kot	03-Nos Cartons	200,000/- ✓	13.10.2023
42.	China Salt	DD No. 14, Dated: 30.11.2023, PS/Mughal Kot	10-Nos Bags	20,00,000/- ✓	30.11.2023
43.	Betel Nut ()	DD No. 14, Dated: 30.11.2023, PS/Mughal Kot	115-Nos Bags	100,00,000/-	30.11.2023

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Attested to be
a True Copy



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Miser

سایکائٹسٹ

Rauf Sherani

MBBS (KMU)
 MCPS (Psych)
 FCPS (Psych)
 Certified CBT Therapist (KMU)
 Ex-Registrar Psychiatry Ward
 Khyber Teaching Hospital, Peshawar



Not Valid For Court
 باہر اسرار: نفسیات و جنسیات، منشیات
 مرگی، سر درد، دوام، گھبراہٹ، بچوں کے
 نفسیاتی امراض، بے خوابی، ڈپریشن

ڈاکٹر رؤف شیرانی

ایم بی بی ایس (کے ایم یو)
 ایم سی پی ایس (سایکائٹری)، ایف سی پی ایس (سایکائٹری)
 سسٹیفائیڈ سی بی ٹی تھراپسٹ (کے ایم یو)
 سابق رجسٹرار سایکائٹری وارڈ خیبر ٹیچنگ ہسپتال پشاور

Pt. Name Ejaz Ishaq Age 33 Sex M Date 10/9/2024

History

Δ Depression
 + Palpitation

1) Ten. Rize Plus / Estor 20mg
 6 دن تک

2) Ten. Rize Plus / Estor 20mg
 6 دن تک

3) Ten. Imoval 40mg
 6 دن تک

4) Ten. Imoval 40mg
 10 دن تک

5) Ten. Imoval 40mg
 5 دن تک

1) ماحول
 2) طبی

Dr. Rauf Sherani
 MBBS (KMU), MCPS (Psych), FCPS (Psych)
 Certified CBT Therapist (KMU)
 Ex-Registrar Psychiatry Ward
 Khyber Teaching Hospital, Peshawar

Whatsapp No. 0346-9878640 کلینک ڈاکٹر رؤف شیرانی پشاور
 کلینک ڈاکٹر رؤف شیرانی پشاور

337 10/01/03
 Amood Memorial Teaching Hospital
 Dera Ismail Khan

Door Patient's Department 17297

14/09/2024

Name: Ejaz Khan do M Tqbal Id
 Disease: Psychiatry
 Yearly No
 Rs 30/-

337 Depression

Tab Citraon

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5.6 - 10 1/2 20

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 123
 123
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(M) ESO 10

(37) 1016995

Anmood Memorial Teaching Hospital
 Dera Ismail Khan

Out Door Patient's Department 20498

Date 22.09.2024

Yearly No

Name Ejaz Khan s/o M Iqbal Khan

Disease Psychiatry

Rs 50/-

F/ up for 3308

Depression

Att 2012

1-1-2024

(56) Tab Cifanew 20
 100 - 100000

(56) Tab Indral 10mg
 1+1

