

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

Amended Service Appeal No. 284/2023

*Amended* Service Appeal No. 284/2023

Arshad Iqbal,  
Ex-Constable No.173,  
Police Force, Karak.....Appellant.

Versus

The Provincial Police Officer, & others.....Respondents.

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*Appellant*  
Appellant

Through

*Ashraf Ali Khattak*  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

Dated: 18/11/2024

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Arshad Iqbal,  
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Police Force, Karak.....Appellant.

Versus

1. The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer,  
Kohat Region,  
Kohat.
3. The District Police Officer,  
Karak.....Respondents.

Service Appeal under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1074 read with Police Rules, 1975 (amended in 2014) against the impugned final order of Respondent No.1 bearing No.505-511/24 dated 22-03-2024 passed in Revision Petition of the Appellant; preferred against the impugned order of the respondent No.2 dated 06-01-2023, who vide the same rejected the departmental appeal of the appellant preferred against the impugned original order of respondent No.3 dated 29-11-2022.

Prayer:-

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

1. Declare all the impugned orders of respondent No.1 bearing No.505-511/24 dated 22-03-2024, impugned dated 06-01-2023 of the respondent No.2 and the impugned order dated 29-11-2022 of the respondent No.3 as illegal, unlawful and without lawful authority and set aside the same.
2. Direct the respondents to re-instate the appellant with all back benefits.
3. ANY other remedy deemed appropriate in the circumstance of the case and not specifically asked for may also be graciously granted.

Respectfully Sheweth,

The concise facts giving rise to the present service appeal are as under:-

1. That appellant was appointed as Foot Constable on 05-08-2009. He has more than 13 years' service at his credit with unblemished and clean sheeted conduct record.
2. That appellant was charge sheeted by respondent No.3 vide charge sheet & statement of allegation dated 05-11-2021 with the following words:-  
"As per letter vide No.308/HQ/PA, dated 28-10-2021 received from SDPO Karak that you constable Arshad Iqbal No.173 have share/leak police performance and also tarnish the image of police in general public. This is quite adverse on your part and shows your malafide intention, wilfull breach and non-professionalism in the discharge of your official obligations. Such act on your part is against the service discipline and amounts to gross misconduct."  
Copy of charge sheet and statement of allegation dated 05-11-2021 are attached as **Annexure-A**.
3. That appellant replied and denied the allegation.  
Copy of reply to the charge sheet is attached as **Annexure-B**.
4. That inquiry was conducted through SDPO Takhti-e-Nasrati, who in the absence and at the back of appellant recorded the statement of the incharge Chowki. Amjad Shaheed Shnva Khudi Khel, Circle Incharge

Takhti-e-Nasrati, District Security Branch (DSB) Staff, who recorded the statement of Local Elders and submitted report. It is worth mentioning that DSB Staff vide their report declared and notified that appellant is gentleman and has no link what so ever with criminals and anti-state groups. The inquiry officer failed to collect an iota of incriminating evidence against the appellant.

Copy of inquiry report dated 25-02-2022 and report of DSP Staff is attached as **Annexure-C**.

5. That it is very astonished that the inquiry officer without reference to any evidence and cogent and legal ground held the appellant as guilty and recommend him for severe punishment.
6. The respondent No.3 constituted another review/enquiry inquiry officer "SP Investigation Wing Karak", who again conducted inquiry without association of appellant. As per inquiry report SP Investigation Wing Karak has recorded the statement of one Mr. Najeeb Ullah HC No.290 in charge Police Post "Shah Saleem as well as FC Umer Sawab No.890. Appellant has neither been provided opportunity of cross examination of the said witnesses nor have the statements been recorded in the presence of the appellant.

Copy of the inquiry report dated 03-08-2022 conducted through SP Investigation Wing along with statement of Mr. Najeeb Ullah HC No.290 incharge Police Post "Shah Saleem as well as FC Umer Sawab No.890 are attached as **Annexure-D**.

7. That from the bare perusal of the statement of both the witness, it is very clear that appellant is not involved in the alleged charge leveled against him although the same has been recorded in the absence and at the back of the appellant without opportunity of cross examination.
8. That it is also pertinent to explain that both the inquiry officer/committee have not recorded the statement of the so called complainant SDPO Karak on whose complaint vide letter No.308/HQ/PA, dated 28-10-2021 the

impugned inquiry has been initiated, which is against the statutory rules governing the subject matter.

Copy of the letter No.308/HQ/PA, dated 28-10-2021 of complainant SDPO, Karak, wherein appellant was blamed for having links with criminal is attached as **Annexure-E**.

9. That appellant was served with "Final Show Cause". Appellant submitted reply to the show cause and again denied the allegations.

Copy of the Final Show Cause Notice dated 02-11-2022 and reply to the show cause are attached as **Annexure-F**.

10. That Respondent No.3 vide order dated 29-11-2022 imposed upon the appellant major penalty of dismissal from service under Police Rules, 1975 (amended in 2014) without consulting the record.

Copy of impugned order of respondent No.3 dated 29-11-2022 is attached as **Annexure-G**.

11. That appellant being aggrieved from the impugned order dated 29-11-2022 of the respondent No.3; preferred departmental appeal before the respondent No.2, who vide impugned final order dated 06-01-2023 rejected the same.

Copy of departmental appeal and the impugned order of respondent No.2 dated 06-01-2023 is attached as **Annexure-H**.

12. That appellant filed Revision Petition under Police Rules, 1975, which was dismissed vide impugned order bearing No.505-511/24 dated 22-03-2024 by respondent No.1 after laps of more than one year, but the same was not communicated to the appellant, but has been affixed by the respondents in response to the order sheet dated 18-07-2024. The impugned final order itself reveals that it has never been communicated to the appellant.

Copy of the impugned final order dated 22-03-2024 is attached as **Annexure-I**.

Hence appellant being aggrieved and finding no adequate and efficacious remedy is constrained to file this service appeal on the following amongst other grounds:

- A. That the respondents has not treated the appellant in accordance with law, rules and policy on the subject and acted in violation of Article 4 of the Constitution of Pakistan, 1973. The basic charge of sharing and leaking secret information has not been scrutinized through legal evidence. There was/is nothing on record which could connect the appellant with alleged allegations. Neither the person to whom appellant has shared/leaked the secret information nor the day, time, place has been mentioned in the charge sheet and statement of allegation. The Charge Sheet and Statement of allegation also does not provide as to what was/were secret information leaked out or shared by the appellant. In this view of the matter the charge sheet and statement of allegation being not specific therefore, flimsy in nature and defective in spirits.
- B. That slip shod two consecutive inquiries were conducted in the absence and at the back of the appellant. Appellant was not associated with inquiry proceedings. Statement of certain person were collected without being scrutinized with the scrutiny of cross examination, but even then, the enquiry officer failed to procure an iota of evidence against the appellant. The conduct of both the inquiry officers were against the spirits of prescribed procedure provided in the statute and statutory rules therefore. the inquiry proceedings and its findings are nullity in the eyes of law and justice and liable to be reversed and set aside.
- C. That no worth credit evidence has been collected by the inquiry officers in support of alleged accusations. The impugned orders are based on conjunctures and surmises. The recommendations of the inquiry officers are based on the information allegedly collected through secret sources. Appellant has never been confronted with such type of evidence therefore, cannot be held to be legal evidence and conviction cannot be based upon such type of evidence in the light of law laid down by the Hon'ble Supreme Court of Pakistan.

- D. That appellant is entitled to be treated in accordance with law and also entitled to be treated fairly, justly and be provided with opportunity of hearing under the provision and spirit of Article 10A of the Constitution of Islamic Republic of Pakistan, 1973.
- E. That section 16 of the Civil Servant Act, 1973 provide that a civil servant is liable for prescribed disciplinary actions and penalties only through prescribed procedure. In instant case prescribed procedure has not been followed.
- F. That the charge sheet and statement of allegation are ambiguous in nature and does not provide comprehensive accusation and against the true meaning of charge, which has caused serious injustice in matter of fair defense.
- G. That so called slipshod inquiry has been conducted in the absence and at the back of the appellant. Appellant active participation during inquiry proceeding has been willfully and deliberately ignored. Inquiry proceedings are of judicial in nature in which participation of accused civil servant as per law condition sine qua non. On this ground the impugned orders are coarm non judice and liable to be set back.
- H. That the well-known principle of law "Audi altram Partem" has been violated. This principle of law was always deemed to have embedded in every statute even though there was no express specific or express provision in this regard.

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



- I. That the non-provision of the inquiry report amounts to deprive a civil servant from confronting and defending himself from evidence that may go against him, which is against the provision of Article 10A of the Constitution of Pakistan, 1973. In the instant case copy inquiry report has been denied to the appellant, which fact is evident from the perusal of the final show cause notice.
- J. That under the provision of Rule 14 of E & D Rule, 2011, the competent authority was under legal obligations to peruse the inquiry report and determine as to whether the inquiry has been conducted in accordance with prescribed procedure and whether the charge are proved or otherwise. The competent authority has made no such efforts and dismissed the appellant with a single stroke of pen, which is nullity in the eyes of law and liable to be interfered with by this Honorable Tribunal.
- K. That all the impugned orders are not speaking orders. It is settle principal of law that every order shall contain (i) Concise facts (ii) issue for determination (iii) decision thereon and (iv) reason for decision. No such elements are available in all the impugned orders.
- L. Accused is stated to be a favorite child of law and he is presumed to be innocent unless proved otherwise and the benefit of doubt always goes to the accused and not to the prosecution as it is for the prosecution to stand on its own legs by proving all allegations to the hilt against the accused. Mere conjectures and presumption, however strong, could not be made a ground for penalizing a civil servant [1999 PLC (CS) 1332 (FST)].... Unless and until prosecution proves accused guilty beyond any shadow of doubt, he would be considered innocent [1983 PLC (CS) 152 (FST)].
- M. That Re-instated employee would be entitled to back benefits as a matter of course unless employer is able to establish by cogent evidence that concerned employee had been gainfully employed

elsewhere. In this respect, initial burden would lie upon the employer and not upon the employee to prove that such employee was gainfully employed during period of termination from his service. 2010 TD (Labour) 41.

N. That Civil servant who was dismissed from service through arbitrary and whimsical action of the government functionaries and re instated through judicial order of Service Tribunal would have every right to recover arrears of salaries by way of back benefits due to them during the period of their dismissal and re instatement. It would be very unjust and harsh to deprive them of back benefits for the period for which they remained out of job without any fault on their part and were not gainfully employed during that period.....Supreme Court allowing their appeal and directing payment of back benefits to the appellant. 2006 T D (SERVICE) 551 (a).

O. That the penal order is not a speaking order for the reason that no solid and legal grounds have been given by the penal authority in support of his penal order. On this score the impugned order is liable to be set aside.

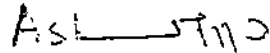
P. That appellant would like to seek the permission of Your Kind Honour for award of personal hearing. Appellant may kindly be granted the opportunity of personal hearing.

It is therefore, humbly prayed that the instant service appeal may kindly be allowed as prayed for above.

(i) Any other relief as deemed appropriate in the circumstances of case not specifically asked for may also be granted to petitioners.

Appellant 

Through

  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

Dated: 18/11/2023

CERTIFICATE

Certified on instruction that appellant has not previously moved this Hon'ble Tribunal under section 4 of the Service Tribunal Act, 1074 regarding present matter.

A.s L T 110

Ashraf Ali Khattak  
Advocate, Peshawar.

List of Books

1. The Constitution of the Islamic Republic of Pakistan, 1973.
2. Services Law.

NOTE

1. Six spare copies of the Service Appeal are enclosed in a separate file cover.
2. Memo of addresses is also attached.

A.s L T 110

Ashraf Ali Khattak  
Advocate, Peshawar

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Ex-Constable No.173,  
Police Force, Karak.....Appellant.

Versus

The Provincial Police Officer, & others.....Respondents.

AFFIDAVIT

I, Arshad Iqbal, Ex-Constable No.173, Police Force, Karak do hereby solemnly affirm and declare on oath that the contents of this Service Appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

  
Deponent

CNIC: 14203-0698402-7  
Cell: 0346-5675561

  
13/11/24

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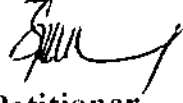
ADDRESSES OF PARTIES

Arshad Iqbal,  
Ex-Constable No.173,  
Police Force, Karak.....Appellant.

Versus

- 4. The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.
- 5. The Regional Police Officer,  
Kohat Region,  
Kohat.
- 6. The District Police Officer,  
Karak.....Respondents.

Through

  
Petitioner  
AsL TIP  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

Dated:18/11/2023

Anq "A" (12)  
No 933 /Enq  
Dated: 05/11/2021

CHARGE SHEET

I, SHAFI ULLAH, District Police Officer, Karak as a competent authority, hereby charge you Constable Arshad Iqbal No. 173, posted at PS Shah Salim as follows:-

"As per letter vide No. 308/HQ/PA, dated 28.10.2021 received from SDPO Karak that you Constable Arshad Iqbal No. 173 have share/leak Police secrete information to private individuals/criminals which affect the Police performance and also tarnish the image of Police in general public. This is quite adverse on your part and shows your malafide intention, willful breach and non-professionalism in the discharge of your official obligations. Such act on your part is against the service discipline and amounts to gross misconduct."

1. By the reason of your commission/omission, constitute miss-conduct under Police disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08 2014) Govt. of Khyber Pakhtunkhwa, Police Department, you have rendered your-self liable to all or any of the penalties specified in Police Rule-1975 ibid.

2. You are, therefore, required to submit your written defense within 07-days of the receipt of this charge sheet to the enquiry Officer Mr. Abid Khan Afridi, SDPO, T. Nasrati is hereby appointed for the purpose of conducting enquiry.

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

3. Intimate whether you desire to be heard in person.  
4. A statement of allegation is enclosed.

District Police Officer Karak

Handwritten notes and signatures at the bottom of the page, including a large signature and the number 2021.

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DISCIPLINARY ACTION

I, SHAFI ULLAH KHAN, District Police Officer, Karak as a competent authority, is of the opinion Constable Arshad Iqbal No. 173 posted at PS Shah Salim has rendered himself liable to be proceeded against on committing the following act/commission within the meaning of Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department.

STATEMENT OF ALLEGATIONS

"As per letter vide No. 308/HQ/PA, dated 28.10.2021 received from SDPO Karak that Constable Arshad Iqbal No. 173 has share/leak Police secrete information to private individuals/criminals which affect the Police performance and also tarnish the image of Police in general public. This is quite adverse on his part and shows his malafide intention, willful breach and non- professionalism in the discharge of his official obligations. Such act on his part is against the service discipline and amounts to gross misconduct."

1. The enquiry Officers Mr. Abid Khan Afridi; SDPO, T. Nasrati in accordance with provision of the Police Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department may provide reasonable opportunity of hearing to the accused official, record his finding and make within 10-days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.
2. The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

*enquiry*  
*File*  
*Sheet*

District Police Officer, Karak

No. 234 /Enq, dated 05/11 /2021.

Copy to:-

1. The enquiry Officers for initiating proceeding against the accused under the Provision of the Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department.
2. Constable Arshad Iqbal No. 173 posted at PS Shah Salim

TESTED

تحوالہ جاری شدہ نمبر 233 صبح 5-11-2021 سفر و عمل  
 حقون آسن ملزم آفسر سے 2021 سے جوئی شہرہ  
 کڈ بھیل تمام شاہ مسلم میں لقیات ہوں۔ انعامک انرجی  
 جوئی کی ذمہ داری عرفا اور عرف انعامک انرجی پلورٹ  
 کی حفاظت ہے۔

اسی پلورٹ دیر سے باہر کوئی ڈیوٹی سرانجام نہیں دیتے  
 لہذا پلورٹ دیر سے حضرات یا کٹر عینس کے ساتھ لقیات  
 کارروائی یہی پیدا ہیں ہوتے۔ سن ملزم آفسر کے نام  
 درپردہ جو بائیل طہرات 0346567556 اور 03339539561 درج  
 ہیں لہذا اسی طہرات کے CDR حاصل کریں۔ اور سن ملزم  
 آفسر نے کسی مشکوک شخص سے بات نہیں کی ہے  
 سن ملزم آفسر جیسیا اتر HC کے زیر نگرانی ڈیوٹی پر آئی  
 دیتا ہوں۔ لہذا پلورٹ کردار سے جیسیا اتر HC خوب واقف  
 ہیں۔ ان سے معلومات کے حاصل کیے ہیں

مزید جاری شدہ ہیں عائد الزامات تمام نوعیت کے ہیں  
 ایسے الزامات جس کڈ لٹ کے دفتر میں نہیں پڑتے ہیں  
 میرا سروکل ریکارڈ صاف اور مستوفی ہے 12 سال توڑل  
 سرویس میں کسی بھی محکمہ کا جوئی کا سامنا نہیں آتا  
 ہے۔ جنات SPDP کا صاف ہے۔ شاہد لاطیف سے  
 سن ملزم آفسر کے خلاف الزامات کے ہیں۔



من ملزم آفند كدر جمع التزامات مع سهرى الزمرد

القدر عن

كسبيل ارشاد اقبال لمنز 173 چون بشنوه ارشاد

سهرى

فائل رپورٹ

ذاتی بنیاد

نمبرال پر راج شیت اور کام نمبر No.233/Eng مورخہ 05-11-2021، بجاریہ جناب ڈسٹرکٹ پولیس آفیسر کرک، برخلاف کنسٹیبل ارشد اقبال نمبر 173 خان شاہ، سید جمال پولیس اسٹیشن کرک ازبیرہ تھیلی کو مارک ہو کر زیر تھیلی نے انکوائری کر کے جو کذیل ہے۔

تعمیرات

نمبرال چارج شیت ہذا متذکرہ 11 میں کنسٹیبل ارشد اقبال نمبر 173 تھانہ شاہ سلیم، سال پولیس لائن کرک پر یہ الزام ہے اور بحوالہ تھیلی انگریزی ایگم نمبری No.308/PA.HQ مورخہ 28-10-21 بجاریہ جناب SDPO/HQ صاحب تھیلی سرکل کرک کنسٹیبل متذکرہ جو کلک پولیس کرک کے اہم اور خفیہ معلومات پر الزام ہے۔

بیانات

انکوائری کی عرض سے الزام علیہ کنسٹیبل ارشد اقبال نمبر 173، ازبیرہ تھیلی و طلبہ یدہ حاضر ہو کر جس کا تحریری بیان قلمبند کر کے جولف انکوائری ہذا ہے، جس نے تحریر کیا ہے کہ صرف اور صرف ایک ازبیری پلانٹ کی حفاظت کی جیسے اور اٹاک ازبیری پلانٹ ایریا کے باہر کسی اور مقام نہیں ڈیوٹی سرانجام نہیں دی ہے، جس سے کنسٹیبل کو دنی سے گفتگو کرنے کا موقع نہیں ہوتا ہے، اور سن سال کے نام پر وعدہ سواہل ڈیوٹی سہم ہیں، اس سہمات GDR کا حاصل کر لیں، کہ اس الزام کنسٹیبل نے کسی مشکوک یا دوست سے مانگے علاوہ میرت گدار سے نجیب اللہ HC، انچارج چونکہ انجند اللہ شہید شہوہ پلانٹ شہوہ گڈی نیل باغ خوب واقف ہے، شاید نملہ نہیں سے من کنسٹیبل کے خلاف الزامات۔

انکوائری میں پڑا اس کنسٹیبل ارشد اقبال کے تحریری بیان کے علاوہ انچارج سرکل تحت نصرتی DSB سٹاف کا بھی تحریری بیان قلمبند کیا گیا جولف انکوائری ہذا ہے، جس کے مطابق،

مشاہدات

ذاتی بنیاد میں کنسٹیبل ارشد اقبال کے تحریری بیان کے علاوہ انچارج سرکل تحت نصرتی DSB سٹاف کا بھی تحریری بیان قلمبند کیا گیا جولف انکوائری ہذا ہے، جس کے مطابق، سید جمال پولیس اسٹیشن کرک پر تھیلی چال چلینی بیان ہوا ہے کہ متذکرہ کنسٹیبل ارشد اقبال کے سواہل ڈیوٹی سہمات CDRE؛ چال چلینی سہم اور جنرل تھانہ حال بات ملازمت کا بھی یہ بات ہے کہ متذکرہ کنسٹیبل ارشد اقبال کے سواہل ڈیوٹی سہمات پر متذکرہ انصران بلاخا جان کو شکایت ہے، اور سب سے بڑی بات یہ کہ اسے اہم ترین مقدمہ میں اور اہم واقعات کی بات کسی غیر متعلقہ فرد یا اس جرم سے جو ہے جرائم پیشہ افراد اور عناصر کو معلومات فراہم کرنا چکا۔ اس مقام میں ایک گزٹ شدہ ایفیسر کسی ایک واقعہ سے خلاف پٹری پولیس انصران سہمات کو شکایت تحریر کیا ہے اور اس اجاہر کے خلاف نملہ انکوائری شروع کرنے کا بھی اہم کار ہے لہذا اس سے یہ بات ثابت ہوئی کہ متذکرہ کنسٹیبل ارشد اقبال نے اس واقعہ میں کسی جرم پر مشورہ اور عناصر کو معلومات فراہم کرنا چکا۔

سے نام / Title نمبری

تعمیرات کا ردائی اور انکوائری ہو کر پایا گیا کہ چارج شیت ہذا میں کنسٹیبل ارشد اقبال نمبر 173 کو تصور وار ٹھہرایا جا کر سخت مزاحمت کی اسناد اور مسافر ٹرکی جاتی ہے۔ اور انکوائری پر یہ مرتب ہو کر تدارک ہے۔

سب ڈیوٹی پولیس آفیسر تحت نصرتی۔

ACCEPTED

صافی

16

کوالٹر (10/10) اور (10/10) کے ساتھ ساتھ  
 جو کہ (10/10) کے ساتھ ساتھ  
 (10/10) کے ساتھ ساتھ  
 (10/10) کے ساتھ ساتھ  
 (10/10) کے ساتھ ساتھ

بھارتی ڈسٹرکٹ کوالٹر  
 1971-72

ATTESTED



OFFICE OF THE SUPERINTENDENT  
OF POLICE, INVESTIGATION  
WING KARAK

No. 1831 /Inv:

Date 03/08 /2022

ANX.D.,

(17)

To: The District Police Officer, Karak

Subject: REVIEW COMMENTS AGAINST CONSTABLE ARSHAD IQBAL NO. 173

Memo: Kindly with reference to your good office remarks passed on the subject matter wherein the undersigned was directed to produce review comments / enquiry.

ALLEGATIONS:-

"As per charge sheet vide No. 233/Enq: dated 05.11.2021 allegation against the said constable was leveled that he share / leak police secret information to private individual / criminals which effect the Police performance and also tarnish the image of police in general public."

PROCEEDING:-

Since during the course of review comments: the accused official namely constable Arshad Iqbal No. 173 was summoned heard in person, recorded his statement and cross examined. Similarly statements of Najeeb Ullah HC No. 290 Incharge Police Post Shah Salim as well as FC Umer Sawab No. 807 was recorded and placed on file. Secret information regarding the allegation against the said constable was also obtained.

CONCLUSION:-

During the proceeding it has become very crystal clear that transportation of the accused from Police Post Shah Salim to Police Station Shah Salim has been made through delinquent official Arshad Iqbal No. 173 accompanied by his Incharge HC Najeeb Ullah No. 290 and FC Umer Sawab No. 807 upon directions of their immediate high-ups. So far the allegation pertaining to share / leakage police secret information to private individual / criminals by the alleged accused constable Arshad Iqbal No. 173 is concerned: the available record / circumstantial evidence and secret probe reveals that he is definitely connected to extend every possible help to the accused remained in their custody. The accused in custody also managed phone to his relative in the presence of said constable due to which the said delinquent FC was proceeded departmentally.

FINAL OPINION:-

I am of the view the allegation leveled against constable Arshad Iqbal No. 173 has been proved.

Encl (70)

Superintendent of Police,  
Investigation Wing Karak

(Cross examined)  
Najeeb Ullah / FC  
Umer Sawab / FC  
Arshad Iqbal / FC

الحالة  
Proved  
تبررت  
documentary

18

Respected Sir,

Reference attached F/A

It is submitted that findings report of the Enquiry Officer Mr. Abid Khan Afridi, the then SDPO Takhte Nasrati on the departmental enquiry against Constable Arshad Iqbal No. 173 PS Shah Salim at F/B.

Submitted for perusal and further order, please.

*Abid Khan*  
Enquiry Clerk

W/DPO

*SP (in)*  
*For review comments*

*SP 57 = 565*

*SDPO*  
*19/5/2022*

*i/c c-cell / CDR*  
*clerk*

*For Enquiry report*

*Abid Khan*

Superintendent of Police  
(Investigation wing Karakoram)  
*24/5/2022*

18A6

بیان اذان پڑھ کر کتبہ حبیب اللہ 290/HC مکتبہ جوگی انجمن شہید عارفہ

دیں اس کی رو سے اقرار کرنا ہوں کہ میں جوگی ہذا میں سارا  
 اخراج ڈیوٹی سرانجام دے رہا تھا۔ صبح سے سائے 3 گھنٹوں  
 تک کھڑا رہا۔ 807، شوکت حیات بنگرا، ارشد اقبال 173  
 کتبہ حیات ہے۔ جوگی ہذا میں کوئی حوالہ نہ موجود ہے۔  
 H5 کتبہ 415 سعید خان و دیگر افسران بالہ کی حکم پر ملزم  
 نا معلوم دن کے وقت جوگی لہرنا کرنا تھا۔ اور رات کو کتبہ  
 شاہ سلیم کے حوالہ میں بند کیا جاتا۔ جو 2 دن یہی ملزم  
 نا معلوم صبح سویرے جوگی لہرنا اور رات کو کتبہ شاہ سلیم  
 حوالہ لے جاتا۔ اسی دوران ملزم نا معلوم سے کسی قسم کا  
 نام و لہر نہ ہو سکتا اور نہ ہی ہم کا پتہ ہر اعلیٰ ہے۔ یہ میرا بیان  
 ہے!



المحبیب اللہ 290/HC مکتبہ جوگی انجمن شہید عارفہ شاہ سلیم

1-0248060-14803 خالہ  
 Mob \* 03480898138

Handwritten signature and scribbles.

میں نے لیا نیشنل اسٹڈنٹ اقبال ۱۷۳ کے ذریعے ملزم نے جس پانچ روزہ افکار  
سے رابطہ برقرار رکھنا تھا؟

جس نے خود نہیں دیکھا کہ اس کا جس کے ذریعے جان بچت ہوئے  
میں کہ جس البتہ جب مسلمہ آبر لیا تو نیشنل اسٹڈنٹ اقبال کا نام آتا ہے  
کہ رابطے اس کے ذریعے ہوئے ہیں جو کہ میں نے خود نہیں دیکھے  
بجانب اللہ ۲۹۰

ENIC - 14203-0248260-1

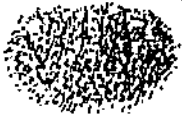
Mob. 0348-0898138

بیان از ان کنسیل عسرتواب نمبر 807 مقصد جوگی احمد شہید  
علاقہ ٹھان شاہ سلیم

ہیں اس تقریر سے اقرار کرتا ہوں کہ میں جوگی خدا میں سکون  
کنسیل تصنیف ٹھان سہرے ساتھ دیگر کنسیل  
شولہ صارت نمبر 173 ارشد اقبال بھی تصنیف کے  
جوگی میں ایچ آر جی ٹیپ ایچ 140 ٹھان جوگی خدا میں کوگی  
حوالہ سے موجود ہے۔ 845 ٹھان 4KS سعید خان و دیگر افسران  
بالدین حکم کے ملزم نامعلوم دن کے وقت جوگی لہیا کرنا ٹھان  
اور رات کو ٹھان شاہ سلیم کے حوالہ سے میں بند کما جانے ٹھان  
جو دوران میں اقدام ہوتا رہا اسی دوران ملزم سے کسی  
قسم کا نام و لہجہ سلوٹ اور نہ جرم کا پتہ براری کی  
یہ سہرا بیان ہے

عسرتواب نمبر 807 مقصد جوگی احمد شہید علاقہ ٹھان شاہ سلیم  
FC

3-8177035-14203  
1586843-0345



Attested

Signature  
SPECIAL AGENT  
P.S.



جو سوالوں کے جوابات اس صبر سے انجام دیے گئے ہیں  
 ان کے ساتھ ساتھ اس میں کئی ترمیمیں بھی

۸۰۷

14203.8177035.3

0345.1586843



4788  
2-11-21

ANX.E., (19)

**OFFICE OF THE  
DEPUTY SUPERINTENDENT OF POLICE,  
HQRS KARAK**

No. 308 /HQ/PA  
Dated 28/10/2021

To: The District Police Officer,  
Karak

Subject: REPORT AGAINST CONSTABLE

Memo: Kindly refer to the subject cited above.

It is submitted that as per personal information of the undersigned the Constable Arshad Iqbal No. 173 of Police Station Shah Salim have share/leak Police secrete information to private individuals/criminals, which affect police performance and also tarnish the image of Police in general public.

Therefore, the above act of Police Constable is against service rules for which he has been quarter guard for 03 days and recommended him for departmental proceeding, please.

( ) ( )  
DY: SUPERINTENDENT OF POLICE,  
HQRS KARAK

EC

District Police Officer  
Karak  
1/11

ANK, F, 20  
No. 117 /Enq

Dated 21/11/2022

**FINAL SHOW CAUSE NOTICE.**

1. I, KHAN ZEB, District Police Officer, Karak as competent authority under the Police Rule-1975 is hereby serve you Constable Arshad Iqbal No. 173 while posted at PP Amjad Shaheed (now PS SNGPL) as follow:-

That consequent upon the completion of re-enquiry conducted against you by Enquiry Officers Mr. Bashir Dad, SP Investigation Wing Karak.

2. On going through the finding and recommendation of the Enquiry Officer and materials on the record and other connected papers including your defense before the said Enquiry Officer, the charge against you were proved and you have committed the following acts / omission specified in Police Rule-1975:-

"As per letter vide No. 308/HQ/PA, dated 28.10.2021 received from SDPO Karak that you Constable Arshad Iqbal No. 173 have share/leak Police secrete information to private individuals/criminals which affect the Police performance and also tarnish the image of Police in general public. This is quite adverse on your part and shows your malafide intention, willful breach and non-professionalism in the discharge of your official obligations. Such act on your part is against the service discipline and amounts to gross misconduct."

3. As a result thereof I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Rule-1975.

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

5. If no reply to this Notice is received within Seven (07) days of its delivery in the normal course of circumstances, it will be considered/presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

6. Copy of findings of the Enquiry Officer is enclosed.



District Police Officer, Karak

حنا - عالی

خواجہ فاضل شوکار ملز 117 / 21/11/22  
صوبہ گلگت بلتستان میں جوئی شوہ ڈیڑھ لاکھ سے زیادہ  
ایٹانک انرجی جوئی کی ذمہ داری صرف اور صرف ان لوگوں کے ہوتی ہے  
پلاٹ کی حفاظت ہے

اسی پلاٹ ایریا سے باہر کوئی ڈیڑھ لاکھ سے زیادہ  
لینڈ ایریٹیوٹک حقارت یا گریڈینٹ کیسے کو تعلقات  
کا سوال یہی پیدا نہیں ہوتا۔ من ولزم آفیسر کے نام  
جو بائیل ملز اسٹریٹ 03339539561 درج ہیں لینڈ ایریٹیوٹک  
03465675561

CDR حاصل کریں۔ اور من ولزم آفیسر کے کسی دست  
سے بات نہیں کی ہے۔ من ولزم آفیسر کیسے  
تے زیر ڈگری ڈیڑھ لاکھ سے زیادہ ہوں

لینڈ ایریٹیوٹک کے ذمہ دار سے محبت اللہ HC جو واقعہ ہے۔ ان کے  
معلومات کے حاصل کیے ہیں۔ من ولزم آفیسر کے ذمہ دار  
الزامات عام نوعیت کے ہیں۔ ایسے الزامات میں گڈ آرڈر  
کے دفتر میں نہیں پڑتے ہیں۔ حیدرآباد میں ایک وارڈ  
اور شتاف ہے۔ 2 سالہ طور پر اس میں کسی بھی قسم  
کا برواٹی کا سامنا نہیں کیا ہے۔ حنا - SDP ہاؤس

من ولزم آفیسر کے خلاف الزامات لگائے ہیں  
من ولزم آفیسر کو الزامات سے بری الزمہ قرار دیا جائے  
العارض

کنیشنل ارشد اقبال ملز 173 جوئی احمد شہید ہاؤس SANCY کک  
10.11.22

ATTESTED

ANX (G) (22)

ORDER

This Order will dispose off the departmental enquiry against Constable Arshad Iqbal No. 173 of this district Police.

As per letter vide No. 308/HQ/FA, dated 28.10.2021 received from SDPO Karak that Constable Arshad Iqbal No. 173 has share/leak Police secrete informatich to private individuals/criminals which affect the Police performance and also tarnish the image of Police in general public. This is quite adverse on his part and shows his malafide intention, willful breach and non- professionalism in the discharge of his official obligations. Such act on his part is against the service discipline and amounts to gróss misconduct.

Higher office  
SDPO  
sub-divisional  
district  
officer

He was issued Charge Sheet and Statement of Allegations. Mr. Abid Khan Afridi, the then SDPO Takhte Nasrati was appointed as Enquiry Officer to conduct proper departmental enquiry against him and he was directed to submit findings in the stipulated time.

بغیرداد (نام نہاد) statements

The Enquiry Officer reported that besides the statement of accused Constable Arshad Iqbal No. 173, the matter was also enquired through DSB Staff Circle Takhte Nasrati wherein it was reported that he has good character at local and residential levels but from the perusal of his mobile CDR data, service roll, and general characteristics carefully which was not satisfactory. He was a complainer against respected officers several times during his service. Furthermore, the most important thing is to provide information about important dealings in such a most important case to an unrelated person or to criminals and elements connected with it, whereas the Gazetted officer writes a complaint against him and submit request for departmental proceedings which proves that he has links with criminals and shared/leaked them secret information. Therefore, the E.O recommended him for harsh punishment.

Not part of charge sheet  
complaint

نسی بی  
enquiry  
سوانح  
T  
evidence

and  
negative  
officer

For further probe and for transparent enquiry, the said enquiry was re-entrusted to Mr. Bashir Dad, SP Investigation Wing Karak for review comments. The Enquiry Officer reported that it has become very crystal clear that the transportation of accused from Police Post Amjad Shaned to PS Shah Salim was made through delinquent official Arshad Iqbal No. 173 accompanied with his Incharge HC Najeeb Ullah No. 290 and FC Umar Sawab No. 807. upon the directions of his immediate seniors. As far as, the allegations pertaining to share/leakage of Police secret information to private individuals/criminals are concerned, the available record/circumstantial evidence and secret probe reveal that he definitely extends every possible help to accused remained in Police custody. The accused in custody also managed cell phone to his relative in presence of the aforementioned officials due to which said delinquent FC proceeded departmentally. Therefore, the allegations leveled against him are proved.

بانی

ان کی ایک کاپی بھی لے لی گئی ہے۔


5-2021

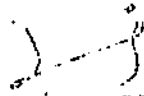
73

He was issued Final Show Cause Notice. In response to the Final Show Cause Notice, accused official submitted his reply, which was found unsatisfactory.

Keeping in view above available record and facts on file, perusal of enquiry papers, and recommendations of the Enquiry Officers, he is found guilty of the charges. He is a stigma on the Police Force. Being a member of the discipline Force, his involvement with criminals and leaking secret information, and providing every possible help to them, stigmatizes the Police department. His further retention in Police Force is no more required. Therefore, in the exercise of the power conferred upon me, I, KHAN ZEB, District Police Officer, Karak, as competent authority under Police Rules 1975 (amended in 2014), hereby impose major punishment of dismissal from service upon defaulter Constable Arshad Iqbal No. 173 with immediate effect.

OB No. 630  
Dated 29/11/2022

  
District Police Officer, Karak

  
ATTACHED

ANX (H)

24

**BEFORE THE INSPECTOR GENERAL OF POLICE KOHAT**

**Subject**            **REPRESENTATION**

Respected Sir,

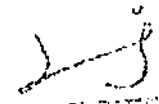
With due respect and humble submission the appellant submits the subject representation against the impugned order of District Police Officer Karak vide OB No. 630 dated 29.11.2022 culminated into the dismissal of Appellant from service, hence departmental Appeal on the following ground and facts.

Facts:

1. That appellant joined police as constable in the year 2009 and qualified recruit course and rendering service to the entire satisfaction of senior officers.
2. That appellant was issued charged on the false and baseless allegations for sharing / leakage of Police Information to the criminals which led to the dismissal of appellant from service vide OB mentioned above.
3. That appellant has sufficient service of 12 years and acquainted with the obligation and duties of police force and can't diviate from it. The impugned order of the district police officer, karak as against the law and rules, hence on the following grounds:

Grounds

- a) That the enquiry conducted by the enquiry officer did not bring even a single evidence against the appellant on enquiry file and completed the enquiry without any solid proof have no legal effects in the eyes of law.
- b) That during course of enquiry the background of the appellant was check through district security branch, Karak and the appellant was declared as good character but the enquiry officer did mull over this facts of DSB report.
- c) That the enquiry proceeding conducted by the enquiry officer not taken into consideration of the plea taken by the appellant and completed the entire enquiry proceedings on the flimsy grounds which is against the basic norms of rules and regulations as envisaged police disciplinary Rules 1975.

  
ATTESTED

25

That the appellant was not given an opportunity of personal hearing neither by the enquiry officer nor the competent authority which is against the natural justice and articles 4, 10 & 25 of the constitution 1973. No one should be condemned unheard

That the impugned order passed by the District Police Officer, Karak is not based on prudence, natural justice and violation of basic rights of the appellant as enunciated in article 19 of the constitution 1973, hence unconstitutional, illegal and liable to be set aside.

That the appellant belongs to a poor family and having small offspring to support is unable to bear the losses of his dismissal from service on flimsy and false allegations. The service of the appellant is a social security to appellant as well as to his family members.

**PRAYERS**

It is, therefore, humbly requested that the impugned order mentioned above may be set aside with all back benefits and appellant may kindly be reinstated in service, please.

Enclosure: Impugned order.

Yours truly,

*(Signature)*  
(ARSHAD IQBAL)

Ex-CONSTABLE No 173  
Tehsil Takhi o Nasrni & District Karak,  
Village Johangiri Banda  
Mob: 03116 5675561

No 17582/EC  
d/c 07/12/2022

DPO Karak

For comments along with  
provision of his S/Recd  
& enquiry file.

*(Signature)*  
D/O POLICE  
KARAK  
07/12

*(Faint stamp)*



25A

Anx - G

POLICE DEPTT:

Karak  
1.32  
12/01/2023

KOHAT REGION

22

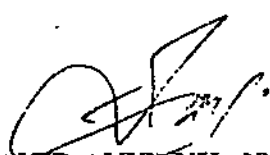
ORDER.

This order will dispose of a departmental appeal, moved by the Ex-Constable Arshad Iqbal No. 173 of district Karak against the punishment order, passed by DPO Karak vide OB No. 630, dated 29.11.2022 whereby he was awarded major punishment of dismissal from service on the allegations of having links with criminals and leaking secret information to private individuals / criminals for his personal gains.

He preferred appeal to the undersigned, upon which comments were obtained from DPO Karak and his service record was perused. He was also heard in person in Orderly Room held in this office on 03.01.2023. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.


I have gone through the available record which indicates that the allegations leveled against the appellant have been proved and the same have also been established by the E.O in his findings. Being a member of disciplined force, he was not supposed to indulge himself in such like anti-social activities which tarnished the image of Police. Therefore, in exercise of the powers conferred upon the undersigned, his appeal being devoid of merits is hereby rejected.


Order Announced  
03.01.2023

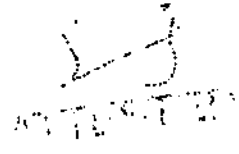
  
(TAHIR AYUB KHAN) PSP  
Region Police Officer,  
Kohat Region.

No. 321 /EC, dated Kohat the 03-01 /2023.

Copy to District Police Officer, Karak for information and necessary action w/r to his office Letter No. 5648/EC, dated 16.12.2022. His Service Record is returned herewith.

OT/ST/EC  
  
District Police Officer  
Karak

  
(TAHIR AYUB KHAN) PSP  
Region Police Officer,  
Kohat Region.





Date: 22/03/2024

INSPECTOR GENERAL OF POLICE,  
KHYBER PAKHTUNKHWA  
PESHAWAR.

AWAL KHAN

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 Arshid Iqbal No. 173. The Applicant was dismissed from service by DPO Karak vide OB No. 630 date 29.11.2022 on the allegations of having link with Criminals and leaking secret information to private individuals/Criminals for his personal gains

The Appellate Authority i.e. RPO Kohat rejected his appeal vide Order Indst. No. 521/EC, dated 06.01.2023.

Meeting of Appellate Board was held on 01.03.2024 wherein petitioner was heard in person. The petitioner denied the allegations leveled against him.

Perusal of enquiry papers revealed that the allegations leveled against the petitioner has been proved. The petitioner failed to submit any cogent reason in his self-defense. The Board sees no ground and reasons for acceptance of his petition, therefore, his petition is hereby rejected.

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

No. SI 505-511 /24, dated Peshawar, the 22-03-2024.

Copy of the above is forwarded to the:

1. Regional Police Officer Kohat.
2. District Police Officer, Karak.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.

Sd/-  
Per in action

DISTRICT POLICE OFFICER  
22873 KARAK

(AWAL KHAN) PSP, QPM  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

Attested

M. Khan  
Inspector Kohat  
Karak

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To: The District Police Officer, Karak.  
From: The Additional Advocate General,  
Khyber Pakhtunkhwa,  
Service Tribunal, Peshawar


No. 3912 ALB, dated Karak the 10/10/2024

Subject: ORDER SHEET IN SERVICE APPEAL NO 284/2023.

Memo

Kindly refer to the honourable Service Tribunal Peshawar order dated 13/07/2024 on the subject noted above.

It is submitted that a detail reports of SRC Branch is enclosed for your kind perusal please.

  
DISTRICT POLICE OFFICER, KARAK

Khan Khel  
Respondent NO-3

284/2023  
As. Shad Iqbal vs Govt (29)

28.06.2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan,  
District Attorney for the respondents present.

2. Learned counsel for the appellant requested for adjournment in  
order to prepare the brief. Adjourned. To come up for arguments on  
18.07.2024 before D.B. P.P given to the parties.

SCANNED  
KPST  
Peshawar

(Muhammad Akbar Khan)  
Member (E)

(Rashida Bano)  
Member (J)

18.07.2024

01. Counsel for the appellant present. Mr. Asif Masood  
Ali Shah, Deputy District Attorney alongwith Malak Jan,  
Inspector for the respondents present.

02. Respondents are directed to produce complete  
background based on which enquiry was conducted as well as  
complete record of the enquiry. They are further directed to  
provide the secret information that the appellant had  
shared/leaked and to whom the same had been leaked. To  
come up for record and arguments on 15/10.2024 before the  
D.B. PP given to the parties.

(Fareeha Paul)  
Member(E)

(Aurazzeb Khattak)  
Member(J)

Reference Attached

R/Sir,

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It is submitted that reply to Order Sheet dated 18.07.2024 Para No 02 of the Honorable Service Tribunal Khyber Pakhtunkhwa, Peshawar is as under:-

"That the Enquiry Officer Mr. Abid Khan Afridi SDPO Takht-e-Nasrati reported that besides the statement of accused Constable Arshad Iqbal No. 173, the matter was also enquired through DSB Staff Circle Takht-e-Nasrati wherein it was reported that he has good character at local and residential levels, but from the perusal of his mobile CDR data, service roll, and general characteristics carefully which was not satisfactory. He was a complainer against respected officers several times during his service. Furthermore, the most important thing is to provide information about important dealings in such a most important case to an unrelated person or to criminals and elements connected with it, whereas the Gazetted officer writes a complaint against him and submit request for departmental proceedings which proves that he has links with criminals and shared/leaked them secret information. Therefore, the E.O recommended him for harsh punishment.

For further probe and for transparent enquiry, the said enquiry was re-entrusted to Mr. Bashir Dad, SP Investigation Wing Karak for review comments. The Enquiry Officer reported that it has become very crystal clear that the transportation of accused from Police Post Amjad Shaheed to PS Shah Salim was made through delinquent official Arshad Iqbal No. 173 accompanied with his Incharge HC Najeeb Ullah No. 290 and FC Umar Sawab No 807, upon the directions of his immediate seniors. As far as, the allegations pertaining to share/leakage of Police secret information to private individuals/criminals are concerned, the available record/circumstantial evidence and secret probe reveal that he definitely extends every possible help to accused remained in Police custody. The accused in custody also managed cell phone to his relative in presence of the aforementioned officials due to which said delinquent FC proceeded departmentally. Therefore, the allegations leveled against him are proved.

*Inspected by*  
*Proceed in*  
*rule of law*  
*Amjad*  
*DPo/Amjad*  
*05/08/2024*

*7*  
*EC/Karak*  
*04/08/24*

بعد الت جنان روس شریبونل ۵ کا ۱۹



2 جانبی  
ادسار خالص مقام حکومت

موزہ  
مقدمہ  
دعویٰ  
بہ

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی ذجواب دہی دکل کاروائی بہر حلقہ  
آن مقام شاہ پور کیلئے اسٹاف علی حدیث  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا۔ نیز  
دیکل صاحب کو واضح نامہ کرنے و تقررات ہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور  
بہ درت ڈگری کرنے اجراء اور وصولی چیک، درو پیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یا بظرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نموانی و نظر ثانی و پیردی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور دیکل یا اختیار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی دہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سامانہ  
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سب سے رہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دیکل صاحب پابند ہوں گے۔ کہ پیردی  
مذکورہ کریں۔ لہذا دکانست نامہ لکھ دیا کہ سند ہے۔

Accepted by

Asl ۱۱۱۱  
2024 11 18

السبب گواہ السبب

بہ مقام شاہ پور

ادسار خالص  
Asl ۱۱۱۱