

# PUNJAB SERVICE TRIBUNAL, LAHORE

## ORDER SHEET

4481/2025

APPELLANT/  
PETITIONER

APPEAL NO. \_\_\_\_\_ 200

Arshad Munir S/o Muhammad Munir

**Versus**

Department: Police

**RESPONDENT**

Date of order of proceeding	Order with signature of Chairman, Members and that of parties or counsel, where necessary.
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06.04.2026	<p>PRESENT</p> <ol style="list-style-type: none"><li>1. Mr. Allah Nawaz Khosa Advocate, Counsel for the appellant.</li><li>2. Ms. Saima Nawaz, D.D.A.</li></ol> <p>On 10.04.2024, after the prayer of Eid-ul-Fitar, an incident of double murder took place within the territory of PS City Kot Addu, regarding which FIR No.526 u/s 302/109/148/149 was registered. Present appellant was posted as Inspector SHO of that police station two days prior to the incidence i.e. on 08.04.2024. He remained posted in the police station for about 16 days and was transferred on 24.04.2024. During this posting as SHO one accused namely Saqib alias Saqi of the above murder case was arrested out of four named and two un-named persons of the FIR, whereas one of the accused namely Ghulam Qasim succeeded to obtain ad-interim bail before arrest one day after the occurrence.</p> <p>2. On 25.04.2024 a charge sheet was issued to the appellant by DPO Muzaffargarh on four allegations which are reproduced herein below:</p> <p>i On 10.04.2014 a dreadful incident of murder took placed in the area of PS City Kot Addu on the day of Eid-ul-Fitr which created panic atmosphere in the area; resultantly, a case vide case FIR No.526/24, dated 10.04.2024 u/s 302/109/148/149 PPC was registered at PS City Kot Addu. You being SHO miserably failed to arrest nominated accused in the FIR as you have close relations with one nominated accused namely Makhdoom Ghulam Qasim. After</p>



Allah Nawaz Khosa Advocate

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		<p><i>the registration of said case you instead of arresting the nominated accused Makhdoom Ghulam Qasim and his (02) sons, protecting said accused persons reportedly in lieu of taking heavy bribe and you got produced/arrested one accused Saqib @ Saqi to save your skin.</i></p> <p><i>ii. Reason behind this incident was previous rivalry/enmity between aforesaid both groups in City Kot Addu and you being SHO did not take any preventive action despite the fact that both the parties have criminal record. If you have taken any preventive action against aforesaid both the groups keeping in view their previous enmity then this double murder incident would not have taken place on Eid day.</i></p> <p><i>iii. Your general reputation in the public is also not good which is highly objectionable on your part being SHO.</i></p> <p><i>iv. His act is highly objectionable and against the law/rules which amounts to gross misconduct warranting stern disciplinary action against him under the rules.</i></p> <p><i>v. Hence this statement of allegations.</i></p> <p>The appellant denied the allegations for which a formal regular inquiry was conducted by DSP/SDPO Kot Addu Circle who concluded that no case of corruption was established against the appellant: that the appellant erred in keeping in contact with one notorious person of the area namely Makhdoom Shehbaz alias Maga because of which the complainant party found an opportunity of propagating against the appellant. His overall conclusion was that: allegations were not proved against the appellant. Vide order dated 26.06.2024 Syed Husnain Haider PSP (DPO Muzaffargarh filed his departmental proceedings under Punjab Police (E&amp;D) Rules, 1975, resultantly the appellant was exonerated from the charge. The above proceedings were taken on the basis of charge sheet No.86/PA dated 26.06.2024 and the order of DPO.</p> <p>3. Amazingly another identical charge sheet No.1078/PA dated 25.04.2024 was separately issued by RPO DG Khan, its accompanying statement of allegation is reproduced herein below:</p> <p><i>i On 10.04.2014 a dreadful incident of murder took place in the area of PS City Kot Addu on the day of Eid-ul-Fitr which created panic atmosphere in the area; resultantly, a case vide case FIR No.526/24, dated 10.04.2024 u/s 302/109/148/149 PPC was registered at PS City Kot Addu. You being SHO miserably failed to arrest nominated</i></p>



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accused in the FIR as you have close relations with one nominated accused namely Makhdoom Ghulam Qasim. After the registration of said case you instead of arresting the nominated accused Makhdoom Ghulam Qasim and his (02) sons, protecting said accused persons reportedly in lieu of taking heavy bribe and you got produced/arrested one accused Saqib @ Saqi to save your skin.

ii. Reason behind this incident was previous rivalry/enmity between aforesaid both groups in City Kot Addu and you being SHO did not take any preventive action despite the fact that both the parties have criminal record. If you have taken any preventive action against aforesaid both the groups keeping in view their previous enmity then this double murder incident would not have taken place on Eid day.

iii. Your general reputation in the public is also not good which is highly objectionable on your part being SHO.

iv. His act is highly objectionable and against the law/rules which amounts to gross misconduct warranting stern disciplinary action against him under the rules.

v. Hence this statement of allegations.

Second parallel inquiry on this later mentioned charge sheet given by RPO was concluded by Syed Ali PSP (DPO Dera Ghazi Khan) whose conclusion is reproduced herein below:

i. Inspector Arshad Munir took charge as SHO Police Station City Kot Addu on 08.04.2024. Less than two days later, on 10.04.2024 (Eid day), a serious incident of double murder occurred in the area. Although he claimed to have taken preventive action u/s 107/150 Cr.PC before the incident, he did not take stronger action under Section 107/151 Cr.PC, which would have been more appropriate considering the known rivalry and criminal background of both groups involved. His explanation for this failure is not satisfactory and shows a lack of seriousness.

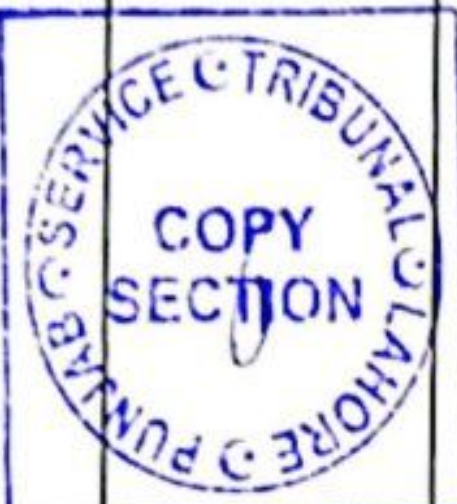
ii. It is also observed that Inspector Arshad Munir had a long-term relationship with one of the main accused, Makhdoom Ghulam Qasim, who is a known government officer. On the night before Eid, the son of the accused visited the officer to greet him, which may be a local tradition but was not suitable under the circumstances. After the incident, instead of contacting neutral sources, the officer contacted the accused, which raises doubts about his impartiality. These actions suggest that he may have shown a soft corner for the accused.

iii. There is no strong evidence of any serious effort on his part to arrest the remaining accused. His claim that the complaint was made due to personal grudge is not supported by any solid proof.




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Allah Nawaz Khosa

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		<p>Relying upon the outcome of the inquiry of the SP order dated 08.10.2025 was passed by RPO D.G Khan whereby penalty of Reduction in rank from inspector to sub inspector for a period of two years was imposed against the appellant. The schedule appended with the Punjab Police (E&amp;D) Rules, 1975 speaks about the powers of punishment and the authority competent to award punishment. Column No.3, 4 and 5 of this schedule states that in case of an inspector, SP is competent to award punishment of stoppage of increments for three years, forfeiture of approved service for two years and censure. It means that an SP is quite competent to award minor punishment to an officer of the rank of inspector of police. Such powers of the SP would essentially include the power to exonerate such an accused. Consequent upon charge sheet No.86/PA dated 22.05.2024 exoneration was made by the authority competent to make it, any parallel proceeding initiated by RPO D.G Khan would amount to second trial on the same charges and thus principle of double jeopardy would attract.</p> <p>4. Order dated 08.10.2025 passed by RPO D.G Khan was passed about one year and more than three months after the above order pass by DPO Muzaffargarh, which had already attained finality and on that touchstone said punishment order of the RPO is suffering from severe illegality. It is made clear that the punishment order of the RPO was passed on independent departmental proceedings and the same was not passed while exercising any revisional authority.</p> <p>5. Order passed by the RPO is based upon the inquiry formulations of SP/DPO D.G Khan whose conclusion has already reproduced in the forgoing paragraphs. As for as facts of the case are concerned, at the time of posting of the appellant as SHO PS Kot Addu one accused person of FIR No.496/24 u/s 324 etc was under investigation and one of its accuse was on physical remand. That incident case of the above mentioned murder case had taken place because of a long standing dispute over the possession of certain landed property belonging to the Govt. of Punjab which is pond area of Indus river. With respect to possession of that landed property earlier an FIR No.179</p>



Allah Nawaz Khosa Advocate

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		<p>dated 04.03.2023 was registered on the complaint of one Muhammad Mehtab against the deceased party of above murder case. At that time present appellant was not posted as SHO of the police station City Saddar Kot Addu. DPO, DG Khan while conducting the inquiry and holding that more appropriate proceedings reasons u/s 107/151 Cr.PC. were required to be taken by the appellant but he failed to record in his inquiry proceedings as to whether or not any such appropriate proceedings were ever taken against the parties since the registration of above said FIR u/s 506 PPC in the year 2023.</p> <p>6. Murder incidence took place on the second day of assuming charge of the appellant and in that short period, the appellant had taken proceedings u/s 107/150 Cr.PC. against the parties, mainly for the reason that no person belonging to the heads of both the parties was arrested at that time. The inquiry report is silent about any proceedings taken against the predecessor SHO of appellant as he did not take any proceeding u/s 107/150 Cr.PC. even.</p> <p>7. With the able assistance of learned D.D.A evidence collected by SP, DG Khan has been perused and evaluated and it has been found that no one appeared against the appellant to level allegation of corruption as mentioned in the statement of allegation, and, therefore, charge to that extent is not proved.</p> <p>8. As for as visiting of a son of Makhdoom Ghulam Qasim to the office of the appellant one day before the occurrence is concerned, it is mentioned in the concluding remarks of inquiry officer that said visit was for the greeting purpose, which is understandable as the visit was made one day before Eid-ul-Fitr and one day after assuming of charge as SHO by the appellant. At the time of said visit, there is nothing on record or in the report of inquiry officer, that said Ghulam Qasim or his sons were involved in the criminal activity.</p> <p>9. Although subsequently Ghulam Qasim and his sons Bilal Qasim and Shehbaz Qasim were nominated in the FIR of above mentioned. Shehbaz Qasim became P.O. Ghulam Qasim and Bilal Qasim were found not involved in the occurrence</p>

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		<p>during second investigation whereas in the first investigation Ghulam Qasim and Bilal Qasim were found involved in the occurrence. The complainant party refused to join/get conduct investigation by RIB and, therefore, the second investigation was conducted by PTB under the supervision of Additional IG, South Punjab. In this way until and unless a final verdict of the court is not surfaced in the murder case, it was not appropriate for the inquiry officer to conclude that the appellant committed a crime of misconduct by contacting Ghulam Qasim shortly after the occurrence. Although CDR of said contact is not available on record and the inquiry proceeding are completely silent on the fact that said telephonic contact of the appellant was made before or after the registration of the FIR, which means that the record is silent that the accused appellant made telephonic call to Ghulam Qasim as notable person of area or an accused of murder case. The inquiry conclusion of SP, DG Khan is therefore, based on conjunctures and surmises which cannot provide any solid ground for passing an order in the nature of penalty.</p> <p>10. For the reasons stated above this appeal is <b>allowed</b> and the impugned orders are set aside. The appellant stands exonerated of charge as final consequence of above discussed departmental order passed by DPO Muzaffargarh. File be consigned.</p>



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**BEFORE THE PUNJAB SERVICE TRIBUNAL, LAHORE**

Service Appeal No. 4481 /2025

**Arshad Munir** S/o Muhammad Munir Akhtar, EX-Inspector No.396 Now SI District Police Rajanpur R/o Mohallah Muhammdia, Aftab Street, House No-86 Post office Khas Khan Garh Tehsil & District MuzafarGarh.



...APPELLANT

**VERSUS**

1) The Additional Inspector General of Police, South Punjab Multan.

✓ 2) Regional Police Officer (RPO), Dera Ghazi Khan Region.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF THE PUNJAB SERVICE TRIBUNALS ACT, 1974 READ WITH ALL OTHER ENABLING PROVISIONS OF LAW AGAINST THE IMPUGNED ORDER DATED 08-10-2025 PASSED BY THE RESPONDENT NO.02 WHEREBY THE APPELLANT WAS AWARDED THE MAJOR PUNISHMENT OF "REDUCTION IN RANK FROM INSPECTOR TO SUB INSPECTOR FOR A PERIOD OF TWO YEARS" AND MODIFY THE APPELLATE ORDER DATED 08-12-2025 PASSED BY RESPONDENT NO.1 WHEREBY THE APPEAL OF THE APPELLANT WAS PARTIALLY ALLOWED.

**Respectfully Sheweth:-**

1. That addresses of the parties have rightly been incorporated in the title / instant appeal for effective service of summons and notices upon the parties.

- 2. That appellant enlisted in Police department as ASI and served the department with neat and clean service record. There is no single official complaint against the appellant of any sort during entire service. Later on, due to good efforts appellant was promoted to the rank of Inspector .
- 3. That succinct fact of the instant Appeal are that allegedly the appellant while posted as Inspector Police Station City District Kot Addu, on 22-05-2024 was charged with following allegation:-



- i. Purusal of record in case FIR No.526/24 dated 10.04.2024 u/s 302/ 109/148/149 PPC PS City Kot Addu revealed that local Police conducted investigation in a defective manner; miserably failed to arrest the accused and finalized the investigation in accordance with law so far which showed lack of supervision over his subordinates towards performance of official duties.
- ii. He (Defaultter Police Officer) committed an impeachable act by conducting a poor investigation and showing deliberate negligence for the sake of selfishness.
- iii. This speaks inefficiency; irresponsible and negligent attitude in the performance of his official duties which tantamount to misconduct warranting disciplinary action against him.
- iv. Hence, this statement of allegations."

Copy of charge sheet dated 22-05-2024 enclosed as

**Annexure-A.**

- 4. That the appellant submitted a comprehensive reply of charge sheet which is enclosed as annexure-B.
- 5. That the inquiry proceedings were initiated against the appellant and Deputy Superintendent of Police Kot Addu was appointed as inquiry officer of the appellant.
- 6. That inquiry officer vide its order dated 30-05-2024 disposed off the charge sheet and submitted the inquiry

report and declare the appellant innocent in the inquiry report and the then District Police office exonerated the appellant from all the charges vide order dated 26-06-2024. Copy of inquiry report dated 30-05-2024 and order dated 26-06-2024 is enclosed as **Annexure-C/C-1**.

**7. That on 25-04-2024 charge sheet was issued against the appellant on the same subject matter with the following charges.**

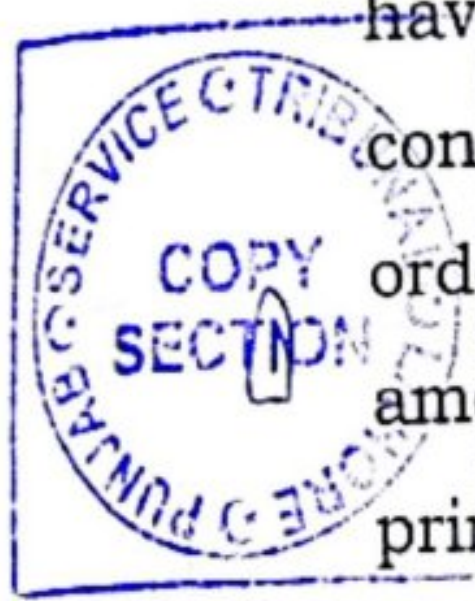


- i. On 10.04.2024 a dreadful incident of murder took place in the area of PS City Kot Addu on the day of Eid-ul-Fitr which created panic atmosphere in the area; resultantly, a case vide case FIR No.526/24, dated 10.04.2024 u/s 302/109/148/149 PPC was registered at PS City Kot Addu. You being SHO miserably failed to arrest nominated accused in the FIR as you have close relations with one nominated accused namely Makhdoom Ghulam Qasim. After the registration of said case you instead of arresting the nominated accused Makhdoom Ghulam Qasim and his (02) sons, protecting said accused persons reportedly in lieu of taking heavy bribe and you got produced / arrested one accused Saqib @ Saqi to save your skin.
- ii. Reason behind this incident was previous rivalry / enmity between aforesaid both groups in City Kot Addu and you being SHO did not take any preventive action despite the fact that both the parties have criminal record. If you have taken any preventive action against aforesaid both the groups keeping in view their previous enmity then this double murder incident would not have taken place on Eid day.
- iii. Your general reputation in the public is also not good which is highly objectionable on your part being SHO.
- iv. His act is highly objectionable and against the law / rules which amounts to gross misconduct warranting stern disciplinary action against him under the rules.

v. Hence this statement of allegations."

That the appellant replied to the charge sheet and declined all the allegations leveled against the appellant. Copy of charge sheet dated 25-04-2024 alongwith reply is enclosed as **Annexure-D/D-1**.

8. That subsequently, a second departmental inquiry was initiated against the appellant on **15-05-2024**, based on the same set of allegations and subject matter as the previous inquiry. The said inquiry was conducted independently and culminated in a detailed inquiry report dated **27-05-2025**. That despite the appellant



having been exonerated once through properly constituted inquiry, a second departmental inquiry was ordered without any fresh or distinct allegations, thereby amounting to double jeopardy and violation of the principles of natural justice. In the second inquiry, conducted by Mr. Syed Ali, District Police Officer DG Khan the Inquiry Officer deviated from the findings of earlier inquiry and, without conducting a thorough or impartial examination of evidence, recommended the disciplinary action against the appellant. The said inquiry report, dated **27-05-2025**, failed to consider the prior exonerations or the absence of new incriminating material. A copy of this inquiry report is enclosed herewith as **Annexure-E**.

9. That despite the fact that the Inquiry Officer, in the inquiry report dated 27-05-2025, did not recommend any punishment or penalty against the appellant, Respondent No. 2, without lawful justification, independent application of mind, or recording any valid reasons for disagreement with the inquiry findings, proceeded to impose a major penalty of **Reduction in Rank from**

Inspector to Sub-Inspector for a period of Two Years" vide Office Order No. 22694/PS dated 08-10-2025. The impugned order is thus arbitrary, reflects non-application of mind, and is violative of the Punjab Police (E&D) Rules, 1975, as well as the settled principles of law.

A copy of the order dated 08-10-2025 is attached as **Annexure-F.**

10. That the appellant, feeling deeply aggrieved by the unjust and disproportionate punishment of reduction in Rank imposed by the Regional Police Officer (RPO) DG Khan through office order dated 08.10.2025, promptly exercised their right to appeal this adverse decision. Accordingly, the appellant preferred an appeal before the respondent No-1, challenging both the grounds and procedure underlying the punishment.



Copy of the departmental appeal is hereby enclosed as **Annexure-G.**

11. However, the respondent No-1 Additional Inspector General of Police South Punjab Multan, through officer order dated 08.12.2025 converted the penalty of "Reduction in Rank from Inspector to Sub-Inspector for a Period of Two years into Reduction in Rank from Inspector to Sub-Inspector for a period of One Year"

A copy of the appellate order dated 08-12-2025 is annexed hereto as **Annexure-H.**

12. That the Impugned order dated 08-10-2025 passed by respondent No-2 be set aside and the appellate order dated 08-12-2025 by respondent No-1 should be modified as the allegations against the appellant are perverse, arbitrary, illegal, void ab initio, unconstitutional

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and contrary to the law relating to the subject and are therefore liable to be set aside on the following grounds -

### GROUNDS

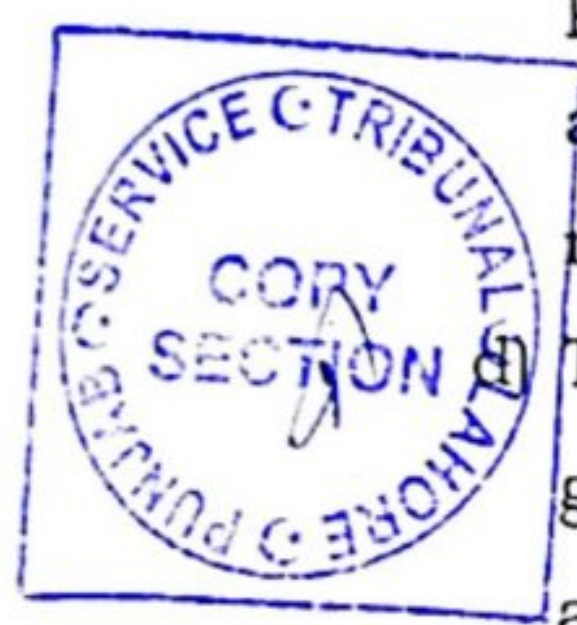
a) That the order passed by the respondents are arbitrary, capricious, and against the settled principles of law, justice, equity, and good conscience. The punishment imposed is not based on cogent evidence and violates the appellant's fundamental right to fair treatment under Articles 4 and 10-A of the Constitution of the Islamic Republic of Pakistan, 1973.



b) That the appellant has served the Police Department with integrity, diligence, and an unblemished service record. He has consistently performed his duties in accordance with law and procedural requirements, which is evident from his previous service evaluations and the numerous commendation certificates awarded by senior officers.

c) That the appellant was posted as Station House Officer, Police Station City Kot Addu, and formally assumed charge on 08.04.2024 at 10:20 PM, whereas the alleged occurrence of murder took place on 10.04.2024 at about 09:30 PM, nearly 48 hours after his posting. It is further pertinent to note that on 10.04.2024 at 09:50 AM, the appellant, with prior permission of the District Police Officer, Muzaffargarh, had proceeded to his hometown to observe Eid-ul-Fitr with his family. Consequently, the appellant had effectively remained posted at the police station for barely 36 hours before the occurrence. Upon receiving information of the

incident, the appellant immediately rushed back and ensured prompt registration of the case. FIR No.526/24 dated 10.04.2024 under sections 302/148/149/109 PPC was registered against four nominated accused and two unknown persons. The investigation was entrusted to a Sub-Inspector and was duly supervised by the appellant in accordance with law. Several raids were conducted, resulting in the arrest of multiple accused, while one accused surrendered before the competent court under police pressure. These facts clearly demonstrate that the appellant neither acted negligently nor displayed any mala fide intention.



That at the time of the appellant's posting, two rival groups with a history of criminal activities were actively operating within the jurisdiction of Police Station City Kot Addu. One group was led by Asad Bilal alias Balo Baryer, who enjoyed legal and social support through influential connections, including a practicing advocate who was also the complainant in the said FIR.

- e) That the second rival group was led by Makhdoom Shahbaz alias Magga, who was socially and legally supported by his father, Makhdoom Qasim, a government officer. Due to the longstanding enmity and previous disputes between both groups, the appellant, immediately upon assuming charge, initiated preventive proceedings under sections 107/150 Cr.P.C. against both parties, thereby discharging his statutory duty diligently and proactively.

f) That the appellant was subsequently suspended and attached to Police Lines, Muzaffargarh, on 24.04.2024, i.e., approximately 14 days after the alleged occurrence, as a result of which further operational control over the investigation and arrest of remaining accused was taken out of his hands. Any delay or failure in arresting the remaining accused thereafter cannot legally or factually be attributed to the appellant. The inference drawn by the Inquiry Officer regarding alleged partiality is speculative, unsupported by evidence, and legally unsustainable.

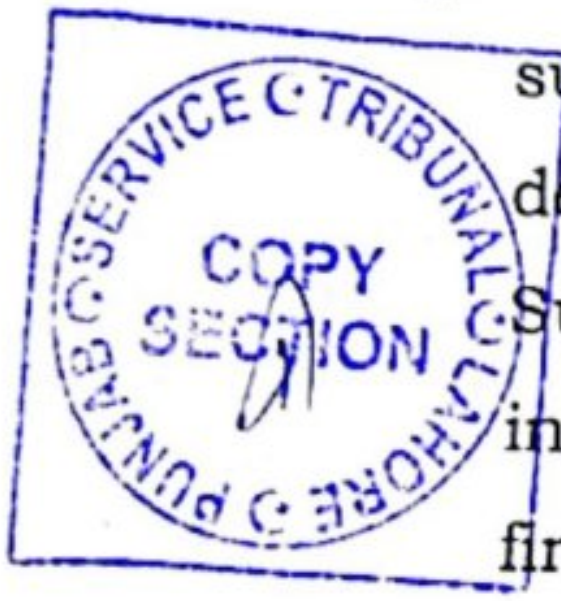


g) That the findings recorded by the Inquiry Officer in the second inquiry are based merely on assumptions, conjectures, and surmises, without any direct, independent, or corroborative evidence. No material on record establishes that the appellant extended any unlawful favor or acted in dereliction of duty.

h) That it is an admitted position that the appellant and Makhdoom Qasim had interacted previously in an official capacity when the latter was serving as a government officer and performed duties during the general elections. However, such interaction was purely professional and official in nature, and at no stage did the appellant extend any concession, leniency, or unlawful benefit to any accused. The surrender of the accused before the court was the result of sustained police pressure and lawful investigative measures.

i) That the investigation of FIR No.526/24 was later transferred to a senior police officer by orders of the Additional Inspector General of Police, South Punjab,

Multan. Upon reinvestigation, the said officer declared Makhdoom Qasim and his sons innocent through a formal case diary. This subsequent development conclusively demolishes the allegation that the appellant acted with bias or mala fide intention and further establishes that the departmental action taken against the appellant was unwarranted, arbitrary, and devoid of lawful justification.



j) That the same set of allegations was previously subjected to one independent and regular departmental inquiry conducted by the Deputy Superintendent of Police, the appellant was found innocent, and no charges were substantiated. The findings of that inquiry categorically exonerated the appellant from all allegations. Copy of inquiry report is enclosed.

k) That despite the clear findings of innocence in earlier inquiry, a second inquiry was unjustifiably initiated on the same subject matter. This action amounts to **double jeopardy**, which is prohibited under the law. Once an employee is exonerated in a duly constituted inquiry, no fresh proceedings on identical facts and allegations can be initiated without new and substantial evidence. This amounts to a violation of Section 403 of the Code of Criminal Procedure, 1898, and also offends the principles of natural justice and legal certainty, as interpreted by the Hon'ble Superior Courts of Pakistan in judgments such as **2010 SCMR 1705** and **PLD 2007 SC 277**.

l) That the second inquiry relied upon by the respondent authorities failed to follow due process.

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The inquiry proceedings were neither fair nor impartial and lacked proper opportunity of cross-examination, production of witnesses, and a transparent fact-finding process as envisaged under Rule 3 of the Punjab Police (E&D) Rules, 1975. The Hon'ble Supreme Court in **2004 PLC (C.S.) 1306** held that departmental inquiries must meet the standards of quasi-judicial proceedings where full participation of the accused is essential.



- m) That the appellant was not served with a proper fact-finding inquiry or a final show cause notice prior to the imposition of the major penalty. This is a mandatory procedural requirement, and its omission renders the entire disciplinary process unlawful and void. Reliance is placed on **2000 PLC (C.S.) 325, 2004 PLC (C.S.) 1615, and 2005 SCMR 678.**
- n) That the honorable Supreme Court in various judgments held that major penalty could not be awarded by adopting summary procedure. **Reliance is placed on 2003 SCMR 681, 2004 SCMR 316, 2008 SCMR 1369, 2007 PLC (CS) 215, 2010 PLC (C.S) 1143.**
- o) That the Apex Supreme Court of Pakistan in various citations declared that before awarding major punishment regular enquiry is mandatory. The punishment awarded without regular enquiry is not only in violation of directions of Supreme Court of Pakistan but against the natural justice. Following citations of Apex court of Supreme Court are relied upon:-

1. 1986 PLC 639
2. 2000 PLC (CS) 270
3. 2000 PLC (CS) 1196

4. 1984 PLC 639

5. 2004 PLC (CS) 1293

p) The Supreme Court of Pakistan has given guide lines how to conduct regular enquiry. In this regard, decision of Apex court published in 2004 PLC (CS) 1306 is as below:-

"Nature and conduct of Departmental Enquiry was not a confidential matter, but record must show involvement/ association of accused civil servant with commissioned misdeeds. Enquiry proceedings were of judicial nature in which participation of accused civil servant was necessary condition and "SINE QUA NON" for the reasons that departmental enquiry was first stage of judicial proceeding which must be conducted strictly in accordance with requirement of law and not whimsically. Examination of witness must be in the presence of accused civil servant during enquiry proceeding.

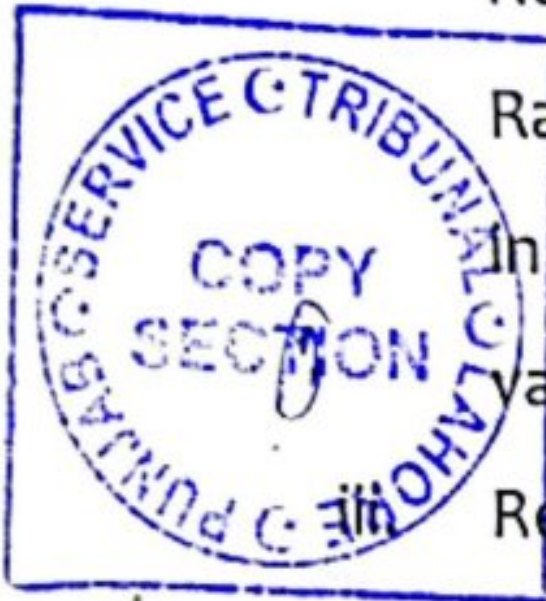


- q) That the charge of illegal gratification or confinement is not supported by any independent evidence. No recovery, witness testimony, or admissible record was presented during the third inquiry to link the appellant with the alleged misconduct.
- r) That the punishment imposed and the appellate decision both suffer from non-application of mind, failure to consider relevant facts, disregard of previous exonerations, and lack of proportionality between the alleged misconduct and the penalty imposed, thereby violating the principle of reasonableness as laid down in **2007 SCMR 1884**.
- s) That the appellant with the permission of this Honorable Court, may reserve a right to present more arguments and grounds during the proceedings of the instant appeal.

**Prayer:-**

**In view of the above submissions and legal grounds, it is most respectfully prayed that this Honorable Court may graciously be pleased to:**

- i. Set aside the impugned Office Order No. 22694/PS dated 08-10-2025, passed by Respondent No. 2, as being illegal, arbitrary, void ab initio, without lawful authority;
- ii. Modify the appellate order dated 08-12-2025, passed by Respondent No. 1, whereby the penalty of "Reduction in Rank from Inspector to Sub-Inspector" was merely reduced in duration, despite the absence of any lawful justification, valid inquiry, or recommendation for punishment;  
Reinstate the appellant to the substantive rank of Inspector of Police, with restoration of seniority, continuity of service, arrears of pay, allowances, and all other consequential service benefits, from the date the impugned penalty was imposed;
- iv. Grant any other relief deemed just, equitable, and appropriate by this Honorable Court in the circumstances of the case.



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**Humble Appellant**

Through

**ALLAH NAWAZ KHOSA**  
 Advocate High Court  
 CNIC No:32102-7363491-1  
 Cell No: 0333-6073636  
 Office.33/A Queens Road  
 Behind Queens Centre,  
 Mozang, Lahore.

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 Lahore  
 15/04/26

**CERTIFICATE:**

As per instructions, this is the first appeal in this Hon'ble Punjab Service Tribunal, Lahore on the subject matter.

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ADVOCATE