**Statement of Muhammad Ahmad Khan, P # 62375**

It is stated that my internal and external work and conduct, remained unblemished and resultantly no single counseling regarding my working has since been issued by any authority during my interior service carrier. However, even I was undue involved in some false allegations without any investigation/giving opportunity of defense as admissible under rules which are explained as under:-

1. On 07.06.2015, I, along with other crew members was operating flight Pk-788 London-Karachi. On reaching Heathrow Airport, we all were advised by the Local Authorities to precede the custom hall for random custom check. After complete checking of my luggage/hand carry, my personal cell phones were taken by the **Local Authorities for checking** and a list was also prepared/issued by the Local Authorities **but nothing suspicious else was found** from me. A copy of such list is attached as **ANNEXURE** **“A”**.

2. After complete checking/satisfaction of my cell phones, the Local Authorities through email informed me that “**the cell phones are cleared**” with the option to **pick up in person** or through **any nominated person in UK**, otherwise the same **can** **be returned back through courier service**. The copy of email is attached as **ANNEXURE “B”**. Accordingly my nominated / authorized person in London received my cell phones under proper receipt copy of the same receipt bearing NO.**T3-E-0010-15** dated: **19-06-2015** is attached as **ANNEXURE “C”.**

3. **As per fundamental laws** “**no one can be punished unheard”** **but contrary to rules and regulations,** **PIA Authorities terminated my services** vide order no. LAOO No. CF-062015028/SP-2039 dated 09-06-2015, **on some fake charges without issuing any show cause notice/inquiry even giving opportunity of personal hearing** under PIA rules. A copy of order is attached as **ANNEXURE “D”**.

4. It is pertinent to mention that just after my termination dated 09-06-2015, a letter dated **05-07-2015,** was received to me by the Metropolitan Police (UK Boarder Force) intimating that **“You are not suspected of any offences or required to re-attend a police station or court of law”**. Furthermore, the Association of Chief Police Offices (Criminal Records Office UK) vide letter dated 18-08-2015, also certified that there exists no criminal record against me in their Police National Computer. Copies of said letters duly issued by **Metropolitan Police and ACPO Criminal Records Office** are attached as **ANNEXURE “E”** and **“F”** respectively. It is pertinent to point out that PIA Authorities, at its own end get confirmed above mentioned letters from concerned authorities in UK about my innocence. The record can be verified from PIA.

5. Keeping in view the **above mentioned clearance issued by the UK Boarder Force,** **I submitted my appeal dated** **29-06-2015** before the Managing Director / competent authority, PIA Head Office, Karachi for my **re-instatement in service** because it was **awarded without initiating disciplinary proceedings/personal hearing,** followed by many reminders.

6. In-compliance to order dated 23-02-2017, issued by the Honorable High Court of Sindh at Karachi (copy attached as **ANNEXURE “G”**), the **undersigned was re-instated** in service by the competent authority vide order dated 26-04-2017. Copy of re-instatement order is attached as **ANNEXURE “H”**. Accordingly I re-joined my duties as such w.e.f 28-04-2017. As per orders of Honorable High Court of Sindh, **I was served with show cause notice** dated 15-06-2017, under rules. After submission of my reply into charges contained in the said show cause notice, Mr.Shahnawaz Abbasi, Deputy General Manager Services/Estate Karachi was appointed as Inquiry Officer. **He conducted the detailed inquiry against me under the charges leveled in the show cause notice.** The copy of notice dated 24.07.2017, issued by the Inquiry Officer for participating in the inquiry proceedings is attached as **ANNEXURE “I”**.

7. After **detailed investigation and completion of inquiry by the Inquiry Officer/**DGM Services/Estate, **the undersigned was exonerated** vide order no. LAOO No. CF-082017182/676 dated 25-08-2017 from all so-called charges leveled against me in the show cause notice. The copy of exoneration order dated 25-08-2017 is attached as **ANNEXURE “J”**.

**Prayer:-**

In the light of above noted facts and situation, it is evident that **neither I** **committed any wrong doing nor found guilty of charges** mentioned in the show cause notice but remained terminated from PIA service during the period from 10-06-2015 to 28-04-2017.This undue punishment not only caused mental torture to me but my family also suffered a lot financially. It is therefore requested that the **back benefits admissible to me under rules may kindly be granted for the interim period** from 10-06-2015 to 28-04-2017.

If any record/evidence is required, I will provide on demand.

Muhammad Ahmad Khan

P-62375