

26.2.2015

Appellant with counsel and Add. AG for the respondents present. Case is adjourned to 10.3.2015 for order.



MEMBER

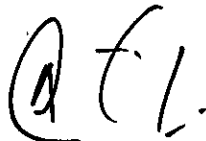


MEMBER

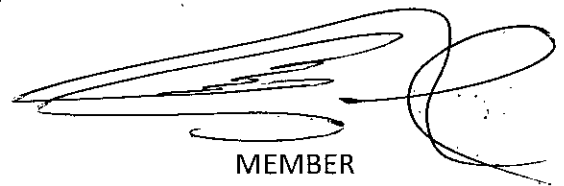
10.3.2015

Appellant with counsel (Sahibzada Assadullah, Advocate) and Mr. Muhammad Jan, GP with Imranullah, S.I (Legal) for the respondents present. Arguments heard. Record perused. Vide our detailed judgment of to-day in connected Service Appeal No. 233/2014, titled Balizar Versus Inspector General of Police, Khyber Pakhtunkhwa, Peshawar etc."; this appeal is also disposed of as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
10.3.2015



MEMBER



MEMBER

Appellant with counsel and Mr. Muhammad

1105.20.50

22.12.2014

Junior to counsel for the appellant and Mr. Muhammad

Muhammad Adeel Butt, AAG with Imranullah, SI (Legal) for the respondents

present. The Tribunal is incomplete. To come up for the same on

19.01.2015

Chairman


READER

19.1.2015 Junior for counsel for the appellant and Mr.

Muhammad Adeel Butt, AAG for the respondents present. It was

submitted on behalf of the appellant that cases of similar nature

have been fixed for arguments on 20.1.2015 and request made for

adjournment to 20.1.2015. As such, case to come up for arguments

on 20.1.2015.

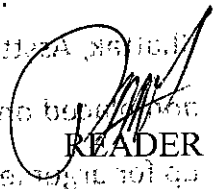

MEMBER

21.01.2015

Since 20th January has been declared as public

holiday by the provincial government, therefore, case to

come up for the same on 22.2.2015.


READER

2.2.2015

Appellant with counsel and Mr.

Muhammad Adeel Butt, AAG with Imranullah, SI

(Legal) for the respondents present. Arguments heard.

To come up for order on 26.2.2015.


MEMBER


MEMBER

08.08.2014 Appellant with counsel and Mr. Imranullah, SI (Legal) on behalf of the respondents with AAG present. Written reply/para-wise comments received on behalf of the respondents, copy whereof is handed over to the learned counsel for the appellant for rejoinder alongwith connected appeals on 8.12.2014.


Chairman

08.08.2014 Appellant with counsel and Mr. Imranullah, SI (Legal) on behalf of the respondents with AAG present. Written reply/para-wise comments received on behalf of the respondents, copy whereof is handed over to the learned counsel for the appellant for rejoinder alongwith connected appeals on 8.12.2014.

15.09.2014 Counsel for the appellant and Mr. Muhammad Adeef Butt, AAG with Imranullah, SI (Legal) for the respondents present. The learned Member (Judicial) is not working due to a recent order of the Hon'ble Peshawar High Court affecting his status as District & Sessions Judge. To come up as before on 10.10.2014.


READER

10.10.2014 Junior to counsel for the appellant and Mr. Kabeerullah Khattak, Asstt. A.G for the respondents present. Rejoinder received and placed on file. Copy handed over to the learned AAG. To come up for arguments on 25.11.2014 alongwith connected appeals.


MEMBER

25.11.2014 Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Imranullah, SI (Legal) for the respondents present. The Tribunal is incomplete. To come up for the same on 22.12.2014.


READER

Appeal No. 257/2014.
Mr. Sher Mohammed Khan

16.04.2014

Clerk of counsel for the appellant present and requested for adjournment due to general strike of the Bar. To come up for preliminary hearing on 02.05.2014.

3.

| | |
|-------------------|---|
| <p>02.05.2014</p> | <p>Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the original order dated 06.12.2013, he filed departmental appeal on 10.12.2013, which has been rejected on 06.02.2014, hence the present appeal on 25.02.2014. He further contended that the impugned order dated 06.02.2014 has been issued in violation of Rule-5 of the Civil Servant (Appeal) Rules 1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. Appellant has also filed an application for suspension of the impugned orders dated 06.12.2013 and 06.02.2014. Notice of application should also be issued to the respondents for reply/arguments. To come up for written reply/comments on main appeal as well as reply/arguments on application on 03.06.2014.</p> |
|-------------------|---|

Appellant Deposited
Security Process Fee
180/- Bank
with File.

08.05.2014

This case be put before the Final Bench for further proceedings

Member

Chairman

3-6-14

The Hon'ble bench is on
Recd. Recd. con 3 filed
16 8.8.14
Recd

FORM OF ORDER SHEET

Court of _____

Case No. 257/2014

| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate |
|-------|---------------------------|--|
| 1 | 25/02/2014 | 3 |
| | | <p>The appeal of Mr. Sher Muhammad Khan presented today by Mr. Sahibzada Asadullah Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing</p> <p>26-2-2014 This case is entrusted to Primary Bench for preliminary hearing to be put up there on 16-4-2014</p> <p>REGISTRAR</p> <p>CHAIRMAN</p> |

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 257/2014

Sher Muhammad Khan(Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

And others.....(Respondents)

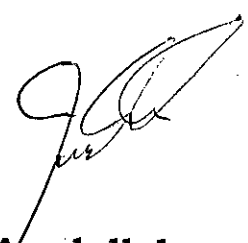
I N D E X

| S.No | Description of Documents | Pages |
|-------------|---|--------------|
| 1. | Service Appeal | 1-9 |
| 2. | Affidavit | 10 |
| 3. | Addresses of the parties | 11 |
| 4. | Copy of show cause notice dated 23/10/2013 and explanation dated 29/10/2013 | 12-13 |
| 5. | Copy of charge sheet dated 28/11/2013 and reply of the appellant dated 29/11/2013. | 14-15 |
| 6. | Copy of the order dated 28/11/2013 | 16 |
| 7. | Copies of statement of appellant along with certificates | 17-23 |
| 8. | Copies of inquiry report and order dated 06/12/2013 | 24-32 |
| 9. | Copies of the commendation certificates | 33-38 |
| 10. | Copies of Certificates | 39-42 |
| 11. | Copy of the letter | 43 |
| 12. | Copies of the letter dated 23/09/2010, 30/06/2010 and order dated 28/07/2009 along with recommendation for promotion dated 13/05/2011 | 44-47 |
| 13. | Copy of appeal and order dated 06/02/2014 | 48-49 |
| 14. | Wakalat Nama | 50 |


Appellant

Through

Dated: 17/02/2014


Sahibzada Asadullah
Advocate Supreme Court
Of Pakistan.
Cell No. 0313-9772262

①

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

Service Appeal No. 257/2014

N.W.F.P.
277
257/2014

Sher Muhammad Khan S/o Sharif Ullah
R/o Village Dagar, District Bunir.....(Appellant)

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer (DIG), Malakand at Saidu Sharif, Swat.
3. District Police Officer, Bunir.....(Respondents)

**APPEAL U/S 4 OF THE N.W.F.P (KHYBER
PAKHTUNKHWA) SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDERS DATED
06/12/2013 AND 06/02/2014 PASSED BY THE
DISTRICT POLICE OFFICER BUNIR AND
REGIONAL POLICE OFFICER, MALAKAND AT
SAIDU SHARIF SWAT RESPECTIVELY.**

Respectfully Sheweth:

Brief facts giving rise to the instant appeal are as under:

FACTS:

1. That the appellant joined the Police Department on 01/09/1981 as constable and performed his duties at various police stations with commitment and devotion.

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That the appellant in the year 1993 completed the Course of Section Commander, Platoon Commander and Tear Gas Course, where after in the year 2000 was promoted to the post of Head Constable C-II.

2. That on 21/10/2013 the appellant was closed to police line where the appellant was served with a show cause notice from DPO Bunir on 23/10/2013 where the appellant gave a detailed explanation on 29/10/2013 to the show cause notice. (Copy of show cause and explanation are attached).

3. That the appellant was charge sheeted on 28/11/2013 where charges of corruption were leveled against the appellant that too on the basis of source report where the appellant submitted a detailed reply by explaining his position on 29/11/2013. (Copy of charge sheet and reply of the appellant are attached).

4. That on 28/11/2013 the respondent No. 3 recommended disciplinary action against the appellant and others in accordance with provision of the Police Rules 1975 and for the purpose Ghulam Muhammad DSP Head Quarters

was appointed as inquiry officer. (Copy of the order dated 28/11/2013 is attached).

5. That during inquiry the appellant recorded his detailed statement regarding his position. The Station House Officers, where the appellant performed his duties issued certificates in favour of the appellant. (Copies of statement of appellant along with certificates are attached).
6. That the inquiry officer prepared his finding report on 30/11/2013 where he opined that the appellant along with others are not suitable for filed posting. The respondent No. 3 on the strength of the inquiry report passed the impugned order where the appellant was compulsorily retired from service vide order dated 06/12/2013 from the date of their suspension. (Copies of inquiry report and order dated 06/12/2013 are attached).
7. That being aggrieved of the order of respondent No. 3 the appellant preferred an appeal before respondent No. 2 which got the same fate vide order dated 06/02/2014.

(Copy of appeal and order dated 06/02/2014 are attached).

8. That being aggrieved the appellant prefers this appeal on the following grounds amongst others inter-alia:

GROUND:

- A. That the impugned orders are arbitrary, mechanical and without the application of judicial mind and passed in vacuum needs interference of this august Tribunal.
- B. That the appellant has served the department since 01/09/1981 with his initial appointment as constable but having curiosity to work hard the appellant passed the required examinations and on the strength of his hard work he reached to the post of Head Constable, throughout his career the high-ups trusted him and no complaints whatsoever was made against him during his stay at various police stations.
- C. That the appellant struggled hard and even retained his position at the time when Bunir was passing through hard times when the terrorists challenged the writ of the

Government without caring for his life. That the appellant throughout his career work hard and helped the police department to his best and his services were recognized by the high-ups and were applauded, he was also issued commendation certificates on 14/10/2013, 30/08/2013, 17/05/2013, 06/03/2013, 04/03/2013 and 23/12/2019. (Copies of the commendation certificates are attached).

D. That the appellant were ever performed his duties was liked by the people with whom he remained associated and numerous certificates were awarded examples are on 06/05/1996 by Ghulam Farooq Khan Deputy Commissioner Bunir, in the year 2000 by District and Sessions Judge, Bunir, Said Marof Khan District and Sessions Judge, Bunir, on 10/07/1996 by Zain Khan Khalil Deputy Commissioner Bunir. (Copies of Certificates are attached).

E. That the career of the appellant is full of the performances where he on one hand made the life of the criminals miserable whereas on the other he helped to curb the activities of the timber mafia. That the outstanding performance which the appellant performed

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during the insurgency period i.e. 2009 the Deputy Inspector General of Police Malakand Region vide letter No. 1635-40/E dated 13/02/2010 directed all the District Police Officers and Malakand Region to prepare lists of the officers who worked during insurgency 2009 for accelerated promotion. (Copy of the letter is attached).

F. That the appellant's interest can be judged from the fact that he while posted at one of the police station made his private efforts and purchased property measuring 13 marlas adjacent to police building free of cost in this respect the appreciation letter dated 23/09/2010. The appellant was also promoted as ASI on the basis of shoulder promotion due to his hard work when on 30/06/2010 the District Police Officer wrote to Deputy Inspector General of Police Malakand Region Swat and on 28/07/2009 he was promoted as ASI. (Copies of the letter dated 23/09/2010, 30/06/2010 and order dated 28/07/2019 along with recommendation for promotion dated 13/05/2011 are attached).

G. That the respondents No. 2 & 3 through the blind orders stigmatized the bright career of the appellant not only

through this illegal order within the department but in the public as well, despite the fact that the sacrifices of the appellant are beyond explanation, so much so that his own house was also demolished by the terrorists during attack.

H. That this is the element of surprise that on 21/10/2013 the appellant was closed to the police line, on 23/10/2013 was served with a show cause notice which was duly replied but that did not help the appellant. On 28/11/2013 charge sheet was served upon the appellant, to which the appellant also submitted detailed reply but instead the DPO Bunir ordered the conduct of inquiry and for that matter inquiry officer was deputed to record the statements of all concerned. The inquiry was conducted in a strange manner that during the inquiry the appellant also handed over various certificates issued in his favour by different station houses officers.

I. That on the conclusion of the inquiry the inquiry officer while submitting his finding report could not find any adverse material against the appellant and no one from the public came forward to record any complaint against

the appellant rather the recommendation was based only upon the hearsay and concocted source report.

J. That all the proceedings were conducted in haphazard manner and no procedure was followed in strict sense but the hurry shown clearly show the intention of the respondents to make the appellant and some others scape goats so that to help the provincial Government to score in the eyes of public.

K. That the respondents No. 1 and No. 2 were bending upon to issue the impugned orders at any cost which they called a policy of the K.P.K Government.

L. That no material has been brought on record during the inquiry nor any person was produced in support of the leveled allegations which could justify the stance of the respondents.

M. That the appellant is innocent and has been retired compulsory which is a major punishment which is not in accordance with the police rules and the law laid down for the purpose.

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It is, therefore, humbly prayed that on acceptance of this service appeal, the appellant may kindly be reinstated to his post with all back benefits and the impugned orders dated 06/12/2013 and 06/02/2014 passed by respondents No. 2 and 3 may kindly be set aside.


OR

Any other relief which this august Tribunal deems appropriate may kindly be awarded to meet the ends of justice.


Appellant

Through

Dated: 17/02/2014


Sahibzada Asadullah
Advocate Supreme Court
Of Pakistan.

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. ____/2014

Sher Muhammad Khan(Appellant)

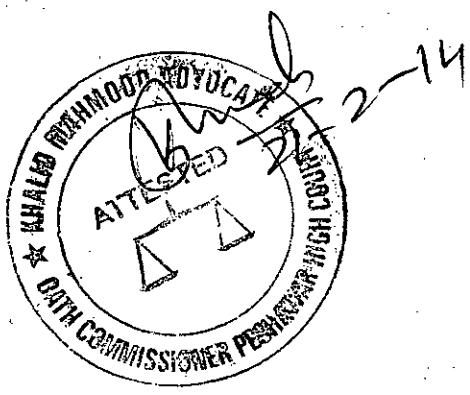
VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

And others.....(Respondents)

AFFIDAVIT

I, Sahibzada Asadullah Advocate, as per instruction of my client, do hereby solemnly affirm and declare, that all the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.



[Handwritten Signature]
ADVOCATE

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

Service Appeal No. ____/2014

Sher Muhammad Khan(Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

And others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Sher Muhammad Khan S/o Sharif Ullah
R/o Village Dagar, District Bunir

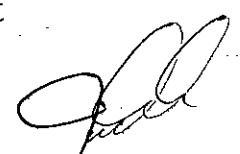
RESPONDENTS:

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer (DIG), Malakand at Saidu Sharif, Swat.
3. District Police Officer, Bunir.


Appellant

Through

Dated: 14/02/2014


Sahibzada Asadullah
Advocate Supreme Court
Of Pakistan.

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3

SHOW CAUSE NOTICE.

WHEREAS, as you the following officers / officials involved in Corruption
as per source report.

| <u>S.No.</u> | <u>Name & Rank</u> | <u>Place of Posting</u> |
|--------------|---------------------------|----------------------------|
| 1. | SI Balizar Khan (Invest.) | I/C Invest: PS Totalai. |
| 2. | ASI Muhammad Wahab | PS Daggar. |
| 3. | ASI Anwar Saeed | PS Gagra |
| 4. | ASI Muhammad Zahid | Police Lines |
| 5. | ASI Zeb Ahmad | PS Totalai |
| 6. | HC Khan Sher | MHC PS Jowar |
| 7. | <u>HC Sher Muhammad</u> | <u>I/C Guard Koga Cany</u> |
| 8. | HC Sher Afzal | PPP Durmai. |
| 9. | HC Bahrawar Said | MM PS Daggar. |
| 10. | HC Sher Wali | I/C PPP Kalil Kandaw |
| 11. | HC Aman Khan | PP Budal. |

You have therefore, committed misconduct which is punishable under rules 4 of Police Rules 1975.

Now therefore, as required by the KPK Police 1975 IASIF ROBAL MOHMAND District Police Officer, Buner call upon to show cause as to why you should not be awarded major punishment as defined u/r-4 (b) of the said rules.

Your explanation should reach the undersigned within 7 days of the receipt of this notice.

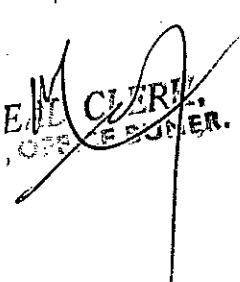
You should state in writing as to whether you wish to be heard in person or not?

In case your written explanation is not received within the specified period, it should be presumed that you have no defence to offer.


**DISTRICT POLICE OFFICER,
BUNER.**

No. 529-30/EG

Dated 23-10/2013.

Alerted

**HEAD CLERK,
S.P. OFFICE BUNER.**

صالحہ پور

دو برس تک

مباحثہ بیان تعلق شہزادہ نوری

ظاہری: دوا مشورہ شہزادہ نوری 39-529 جاریہ طاب 4590

عدادت پورے نوری خدیں دوا
بہ ماہ سال 1981ء 20 مہینے سے پہلے اریل 1993 میں

سین ماڈر، بلالون ماڈرن سٹیٹ گیس کو سٹریٹس کر چکا ہے
سال 2000 میں 15 ماہانہ ہڈی (سٹیٹ گیس) سٹیٹ گیس دوا۔

دوا امریکی 8837/E جاریہ طاب 4590 ماہانہ ہڈی (سٹیٹ گیس) کو سٹریٹس کر چکا ہے
2010-11-25
امریکی دوا کی خانہ لڈھیہ کے تعلق خاتون خانہ لڈھیہ سے راجہ ذاتی امریکی
13 سٹیٹ گیس کے تعلق خاتون خانہ لڈھیہ کے تعلق خاتون خانہ لڈھیہ سے راجہ ذاتی امریکی
کے ہیں۔ اس بنا پر وہاں نوری خدیں دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
کی ہے۔

حال ہی میں امریکی سٹیٹ گیس کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
4590 پورے۔ آجھی کارکردگی کے بنا پر دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
وہ سال ماہانہ ہڈی (سٹیٹ گیس) دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
موصوفی گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
اور ایک ماہانہ ہڈی (سٹیٹ گیس) دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
پورے، سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
- جمالیہ سال کے خلاف کر لینے کے تعلق سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
پورے، سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
نورینی دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
کے تعلق سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
میں کی ہے۔ بہم سال کے خلاف سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
آجھی سال کے خلاف کر لینے کے تعلق سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا
کے تعلق سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا کو سٹیٹ گیس دوا

Attention

DR. M. S. SIKER
P. 50

P. 50

subject in Corruption

عہدہ خزانہ دار
کے فائل
میں

تاریخ 29-10-2013
174
میں

CHARGE SHEET

I, ASIF IQBAL MOHMAND District Police Officer, as competent authority do hereby charge you the following Upper / Lower Subordinates while posted in Police Lines Daggar as follows.

It has been reported against you that you while posted Police Lines Daggar committed the following act/ acts.

As per source report, you are the following Upper / Lower Subordinates were found involved under corruption during the posting of various places.

| <u>S.No.</u> | <u>Name & Rank</u> | <u>Previous Posting</u> | <u>Closed to Police Lines on 12/10/013</u> <u>On the cause of corruption</u> |
|---------------|-----------------------------|---------------------------|---|
| 1. | SI Balizar Khan | I/C Invest: Totalai | -do- |
| 2. | ASI Muhammad Wahab | PS Daggar | -do- |
| 3. | ASI Anwar Saeed | PS Gagra | -do- |
| 4. | ASI Muhammad Zahid | Police Lines | -do- |
| 5. | ASI Zeb Ahmad | PS Totalai | -do- |
| 6. | HC Khan Sher | MHC PS Jowar | -do- |
| 7. | HC Sher Muhammad | I/C Gurad Koga | -do- |
| 8. | HC Sher Afzal | PPP Durmai | -do- |
| 9. | HC Jahrawar Said | MM PS Daggar | -do- |
| 10. | HC Sher Wali | I/C PPP Kalil | -do- |
| 11. | HC Aman Khan | PP Budal | -do- |

Which is / are gross misconduct on your part as defined in Rules 2 (iii) of Police Disciplinary Rules, 1975.

2. By reason of above, you appear to be guilty of mis-conduct and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Rules, 1975.

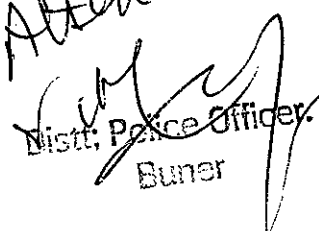
3. You are therefore, required to submit your written reply within 7 days of the receipt of this charge sheet to the enquiry Officer.

4. Your written reply, if any, should reach to the Enquiry Officer within the specified period. In case failing, it shall be presumed that you have no defense to put-in and an ex-parte action will be followed against you.

5. Intimate, as to whether you desire to be heard in person or not?

6. Statement of allegation is enclosed.


DISTRICT POLICE OFFICER,
BUNER

Attended

Distt. Police Officer.
Buner

مصافحتی بیان متعلق جائزہ سٹیٹمنٹ نمبر 572-82 فرم 11-013-28 فرم 2

ڈسٹرکٹ پولیس آفیسر رولہا

(15)

عزیز عالی

معروف شخص ہیں۔ آج ساہیل سال 1991ء کا عمر فی سترہ سال 1993ء میں سیکشن 420 کی بلاؤن کمانڈر خورشید اور دیگر گن خورین میں کمرے کے بعد سن 2000ء میں ناخواندہ ایف پی ڈی کیس میں گرفتار کیا گیا۔ بعد ازاں اسی کارکردگی اور پولیس کوئی طمانو ڈھیری کے متعلق اراچی کل 13 مرتبے خواہن خالو ڈھیری سے اپنے ذاتی اثرو رسوخ سے حاصل کر کے باقاعدہ حکیم مال میں پولیس کے نام ارسال کیا گیا۔ اس بناء پر جی۔ ایف۔ پی۔ ملائڈ ریج نے جی۔ ایف۔ پی۔ 8337/ فرم 9/10 کو بحیثیت متواہر برخواستگی کرتا کیا ہے۔

حال ہی میں پولیس سٹیشن ڈیوٹی کو کما جیب میں تصنیفی کیڈرون جی۔ ایف۔ پی۔ کوئی ایجی ڈیوٹی کیا بناء پر ڈیوٹی سرٹیفکیٹس اور ساہواری الٹا سے لوار ہے۔ کوئی ساہل ناخواندہ پولیس آفسر اور زیادہ سٹیشن ڈیوٹی اور پولیس آفسر سے ملحقہ کارروائی میں تصنیفات کو کر لیتے گناہاں ہیں۔ دوران ڈیوٹی وقتاً فوقتاً پولیس آفسر نے ایجی کارکردگی کی بناء پر سرٹیفکیٹس اور الٹا سے لوار ہے۔ اور ایجی ناخواندہ پولیس آفسر نے قبایح میں ساہیل کی کارکردگی متعلق سزا دہنی تصنیفات اسلام آباد پولیس، ملتان وغیرہ قابل تعریف ہیں۔

گناہاں سے متعلق کے خلاف کر لیں کے متعلق سوچیں روڑی کا متعلق ہے۔ یہ بدلے کے بناء اور متواہر رہتی ہے۔ ساہیل گناہاں میں تصنیفات رہا ہے۔ کوئی ایجی ڈیوٹی تہاات اعابنداری، طافضاتی، کارروائی اور فوق فرا کو مدنظر رکھتے ہوئے انجام دی ہے۔ اور بااثر افراد کو بھی جبر کرتے ہوئے معافی نہیں کی اس وجہ سے ساہیل مخالف سوچیں روڑی متعلق کر لیں متواہر ہوئی ہوگی۔ ایجی تک ساہیل کے خلاف کر لیں کے لئے سے کبھی متواہر کی روڑی تصنیفات نہیں ہوئی ہے۔ گناہاں سے متعلق گورنمنٹ رکھتے ہوئے ہمدردانہ سزا اور سزا سٹیٹمنٹ کی متواہر باہر کو نفع میں کارروائی کے متعلق فرمائیں جائے۔ گناہاں سے متعلق ہمدردانہ سزا اور سزا سٹیٹمنٹ کی متواہر باہر کو نفع میں کارروائی کے متعلق

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ملاواری سٹیٹمنٹ نمبر 174 متعلق پولیس آفسر ڈیوٹی
29-11-013

Attested

[Signature]
"MAHMOOD ZAFAR"
S. P. S. POLICE OFFICER.

DISCIPLINARY ACTION

16

1. I, ASIF IQBAL MOHMAND District Police Officer, Buner as competent authority, is of the opinion that the following Upper / Lower Subordinates while posted as Police Lines have rendered yourself liable to be proceeded against departmentally as you have committed the following acts / omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

That it has been reported against you that you while posted Police Lines committed as per source report, you are the following Upper / Lower Subordinates were found involved under corruption during the posting of various places.

| <u>S.No.</u> | <u>Name & Rank</u> | <u>Previous Posting</u> | <u>Closed to Police Lines on 12/03/13</u> <u>On the cause of corruption</u> |
|--------------|-----------------------------|---------------------------|--|
| 1. | SI Balizar Khan | I/C Invest: Totalai | -do- |
| 2. | ASI Muhammad Wahab | PS Daggar | -do- |
| 3. | ASI Anwar Saeed | PS Gagra | -do- |
| 4. | ASI Muhammad Zahid | Police Lines | -do- |
| 5. | ASI Zeb Ahmad | PS Totalai | -do- |
| 6. | HC Khan Sher | MHC PS Jowar | -do- |
| 7. | HC Sher Muhammad | I/C Gurad Koga | -do- |
| 8. | HC Sher Afzal | PPP Durnai | -do- |
| 9. | HC Bahrawar Said | MM PS Daggar | -do- |
| 10. | HC Sher Wali | I/C PPP Kalil | -do- |
| 11. | HC Aman Khan | PP Budal | -do- |

Which is / are gross misconduct on your part as defined in Rule 2 (iii) of Police Rules 1975.

2. For the purpose of scrutinizing the conduct of said officer with reference to the above allegations Mr. Ghulam Muhammad Khan DSP HQR is appointed as enquiry officer.

3. The Enquiry officer shall conduct proceedings in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer, record its findings and make within twenty five (25) days of the receipt of this order, recommend as to punishment or other appropriate action against the accused officer.

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


DISTRICT POLICE OFFICER,
BUNER

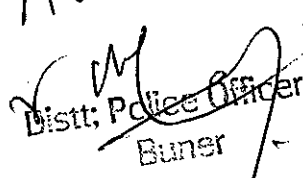
No. 562-72 /EC,

Dated 28-11 /2013

1. Enquiry officer for initiating proceeding against the accused officer namely under Police Rules 1957.

2. Defaulter concerned.


DISTRICT POLICE OFFICER,
BUNER

Attended

Distt. Police Officer.
Buner

حلقہ بیان سولہ میں سال ۱۹۸۱ء کا نوٹس ہر سال ۱۹۸۳ء میں

سکین گمانڈر کورس بلاؤن گمانڈر کورس اور ٹیٹریس کورس

میں کرنے کے بعد سن ۱۹۸۲ء میں ماہوارہ آٹا جدید ٹیٹریس

سوا لعدہ اچھی کارکردگی اور پولیس جوئی خانانورڈ حویلی کے فضل

اراضی کل ۱۳۱۳۰ خواتین خانانورڈ حویلی سے اپنے ذاتی اثرو سوج پر

صاف کرنے باقاعدہ حکم مال میں پولیس کے نام انتقال کی ہے اس

کو حقیقت سولہ ر پورٹوں میں A سے ترقی کیا ہے

حال ہی میں پولیس پٹروٹروٹ کوٹا کھپ میں لغنائی کردوان

جا۔ ۱۹۸۰ء جو سیرت اچھی کارکردگی کی بنا پر ڈوٹر سٹریٹ

اور سادہ القامات سے لوازہ ہے جو تک سائل ناخواندہ پولیس آفیسر

اور زیارہ تریٹروٹروٹ کوٹوں اور پولیس لائن سے حلقہ گارڈ

میں لغنائت رہ کر گشت کرتا رہا ہے دوران ڈوٹی وقتاً فوقتاً

پولیس آفسران نے اچھی کارکردگی کی بنا پر سٹریٹ

القامات سے لوازہ ہے اور اچھے خواتین پولیس آفسران کے حلقہ

میں سائل کی کارکردگی متعلق سرائی گشتی مشیات اسلم اعوان

میں دیکھ کر قابل لوف میں

جہاں تک سائل کے خلاف کرپشن کے متعلق سولہ رپورٹوں کا تعلق

ہے یہ بلکلے بنیاد اور بدینی مر جینی ہے سائل جہاں ہو لغنائت

رہا ہے نوٹاری ڈوٹی بنایت اعانڈاریک جانگھانی بھاری اور

خوف خدا کو مد نظر رکھے ہوئے انجام دی ہے اور با اثر افراد

کو بھی دہم کرتے ہوئے معاف نہیں کی ہے اس وجہ سے سائل کے خلاف

سولہ رپورٹ متعلق کرپشن حوصلوں سولہ سولہ اللہ

سائل کے خلاف کرپشن کے حوالے سے کسی قسم کی درخواست شہادت

میں سولہ ہے لہذا سائل کی کارکردگی کو مد نظر رکھے ہوئے حیدر رام

کو کرتے انگلو آئری فائل کریں یہی ضروری ہے

میں ہے

Attested

۱۷۴ نوٹس میں دیا

۱۷۴ نوٹس میں دیا

۱۷۴ نوٹس میں دیا

صداغالی

موضوع پر ایک شہرہ نما مارا گیا ہے جس میں کتبہ
انکار لکھنا تھا اس کے خلاف کارروائی کی گئی ہے
پس ای ہے۔

[Handwritten signature]

SFD Rawalpindi
DT: 29.11.2013

لوگوں کی اطلاع سے

اتفاق ہے۔

[Handwritten signature]
DSD, Faisalabad
29/11/2013

Attested

NE CLERK
SP. OFFICE BUNER.

ج. ع. ب.

(19)

معرض قدمہ ہو گیا ہے اس سال 2008ء میں میں طبیعت
سے متاثر ہوا تھا اور اس کی طبیعت تھا۔ مذکورہ سیر کے دوران میں
میں نے لوگوں کو سنا تھا کہ ان کے طبیعت سے متعلق
بعض باتیں سننے کے بعد ان کے طبیعت سے متعلق
بعض باتیں سننے کے بعد ان کے طبیعت سے متعلق

[Signature]
Dr. P. Anshu

29/11/2013
Attested

[Signature]
HEAD CLERK,
C.P. OFFICE

گندھار کی سرحد

ماہِ عالی

گندھار (H) طوطی کا پرندہ میں H2 ستمبر 174
 سید علی شاہ شاد سرہ تھا کہ میں گندھار
 زمینا اپنا ماہ گندھار تھا اور اس پر
 میں دیکھ رہا تھا گندھار کی بھی شہزادہ کرشن
 کے متعلق شہزادہ تیسرا تھا کہ ملکہ H2 دیکھ رہا
 نے زمینا دیکھی تھی وہاں رہا دیکھ رہا تھا سرکار دیکھ
 صلیب میں گندھار کے

گندھار کی سرحد
 گندھار کی سرحد
 29.11.13

Attested

My [Signature]

لعدلی سرینقلین

حاج عالی! لعدلی کی حیاتی بھینڈ شیر 174 HC سے ساتھ ساتھ کتا، سوڑ اور گورد جاناورد بھیری میں کشت ماتحت رہ چکا ہے۔ اپنے دور لعدلی میں نزدیک HC کے خلاف بھی کئی بھی شخص نے کرپشن یا دیگر کسی قسم کی شکایت نہیں کی ہے۔ حتیٰ میں لعدلی کرتا ہوں

سابقہ SAO کا نام اور
زنگن اسٹیشن
11-11-20

Attended

HEAL CLERK,
S.P. OFFICE BUNER.

ف ع

تذکرہ خدمت گزاروں کے لئے
 13/2/2013
 ...
 ...
 ...
 ...
 ...
 ...

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 29/11/2013

Attested
 [Signature]
 CLERK
 OFFICE

ص: 11

کے حقوق کیلئے ہمیں شہر میں ...
میں ...
درخواست ...

سید

S/o P.S. Dina Baba

29.11.13

Attested

[Signature]
M. H. ...
M. H. ...

انڈسٹری (11) آرڈر نمبر 562-72 جی. اے. جی. 572-82 جی. اے. جی. 28-11/13 جی. اے. جی. 28-11/13

مختلف کمرنگ ڈیپارٹمنٹ

| گفتہ | نمبر | تفصیل کاغذات |
|------|------|--|
| | 09 | انڈسٹری خیرادہ سائبرنگ رپورٹ |
| | 03 | آرڈر انڈسٹری نمبر 562-72 جی. اے. جی. 572-82 جی. اے. جی. 28-11/13 |
| | 05 | بیان آذان پندرہ خان آف سہ ماہی کے تعلق سے |
| | 04 | بیان آذان پندرہ خان آف سہ ماہی کے تعلق سے |
| | 06 | بیان آذان پندرہ خان آف سہ ماہی کے تعلق سے |
| | 05 | بیان آذان پندرہ خان آف سہ ماہی کے تعلق سے |
| | 05 | بیان آذان پندرہ خان آف سہ ماہی کے تعلق سے |
| | 03 | بیان آذان خان شریف HL 28 |
| | 07 | بیان شریف 174 HL |
| | 03 | بیان آذان شرافض 396 HL |
| | 04 | بیان آذان کمرنگ رپورٹ 372 HL |
| | 07 | بیان آذان شریف 173 HL |
| | 06 | بیان آذان آغا خان 285 HL |
| | 04 | پوشنگ آرڈر پورٹ |

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APPROVED

مظاہر

Superintendent of Police
Hayat Daggar

حوالہ مشرقی خارج ٹیٹ نمبر 572-82 مورخہ 28/13 بجاریہ دفتر ضاب DPo

- 1: SI ایس ایچ ریڈ خان ایچ اے ڈی گیشن طویلانی حال پولیس لائن ڈاگر
- 2: ASI آئی ایس ایچ راجہ پولیس سٹیشن ڈاگر حال پولیس لائن
- 3: ASI آئی ایس ایچ سعید پولیس سٹیشن ڈاگر حال پولیس لائن
- 4: ASI آئی ایس ایچ زاہد پولیس سٹیشن ڈاگر حال پولیس لائن
- 5: ASI آئی ایس ایچ امجد پولیس سٹیشن طویلانی حال پولیس لائن ڈاگر
- 6: HC خان شہر خسرو خان مورخ حال پولیس لائن ڈاگر
- 7: HC شہر شہر ایچ اے ڈی کورنگا حال پولیس لائن ڈاگر
- 8: HC شہر افضل پولیس پوسٹ درگانی حال پولیس لائن ڈاگر
- 9: HC شہر سعید محمد شہر پولیس سٹیشن ڈاگر حال پولیس لائن
- 10: HC شہر بی ایچ اے پولیس پوسٹ کیلیل حال پولیس لائن
- 11: HC آمان خان پولیس پوسٹ بدل حال پولیس لائن ڈاگر

عنوان انٹویری بر خلاف گریٹ پولیس افسران

ضایعہ!

حوالہ مشرقی خارج ٹیٹ نمبر 572-82 مورخہ 28/13 بجاریہ دفتر ضاب DPo

انٹویری نمبر 562-72 مورخہ 28/13 بجاریہ دفتر ضاب DPo

مورخہ 25/13 بجاریہ دفتر ضاب - RPO صاحب بلاکڑا تمام سدر و ستراف سوات عسرف

ہیکہ درج بالا عہدہ داران پولیس سلسلہ مگر اتا 11 بر مختلف مقامات میں تعینات

کے دوران دروغی کے الزامات سوس رپورٹ کے روشنی میں عائد ہو کر جس

پر الزام علیہ عہدہ داران پولیس کے نام چارج شیٹس دفتر ضاب - DPo

پونڈر سے جاری ہو کر ہیں DSP/HS کو الزام علیہ عہدہ داران پولیس کے خلاف

خط لکھ کر انٹویری عمل میں لانے کا حکم صادر فرمایا گیا ہے جبکہ انٹویری میں

حکام - RPO صاحب بلاکڑا سوات عسرف مورخہ 30/13 کو نتیجہ رپورٹ کے

طلب فرمایا ہے

(جاری)

By Superintend
Hqs. F

الزام علیحدہ عدہ دارین نوٹس میں سے ذہنی الزام کے سلسلہ میں مختلف جگہ تعیناتوں سے حکم افسانہ بالا صاحبان نوٹس لائن ڈگری ہوئے کلوز ہو کر آئے ہیں جنکو باری باری طلب کر کے انکے بیانات چمکنہ کے الزام علیحدہ عدہ دارین نوٹس منسلک فرماتا ہے ایسے آپریشن کے الزامات بد عنوانی کے تحت سے انکاری ہیں جن میں سے ہر ایک ایسے آپریشن کے الزامات ہیں، دیانت دار کرپشن سے پاک ملک کا دفاع اور عوام کا خادم ایسے بیانات میں ظاہر کرتا ہے جن میں سے بعض ایسے جنائی میں ہمراہ پیش کر ایسے 2010ء صاحبان کے تصدیقی سرٹیفکیٹ اپنی ایمان داری اور فرض شناسی کے متعلق پیش کر کے ہمراہ بیانات علیحدہ عدہ دارین نوٹس کے الزام علیحدہ عدہ دارین نوٹس کے اعمال تاکہ باری باری ملاحظہ فرمائی

سالہ سزایابیوں، کارکردگی اور تعیناتوں کے متعلق کوٹھن حسب ذیل قابل ملاحظہ ہیں

(1) بلینڈ خان زی حال متعینہ نوٹس لائن تاریخ جبری 19/7/76 ریکورڈ کوری

7/77 لوئر سکول کورس مور 20/3/88 اسٹریٹ سکول کورس مور 20/9/88

تعیناتیاں ضلع سوات : نوٹس لائن سید و شریف = جوگی جسم آباد : نوٹس لائن سینڈ سوات، قحانہ عالیگ، سی ای ای اسے (CIA) سوات، قحانہ ڈگری جوئے جوگی فتح جوئے، نوٹس لائن سینڈ سوات، جوگی جنگلی ضلع جوئے، جوگی جسم آباد سوات : سی ای ای اسے (CIA) جوئے، قحانہ تارہ گی جوئے، جوگی FRP ملائند، ضلع جوئے ریگولر، گلپانڈری جوئے، تارہ گی جوئے، نوٹس لائن سوات، قحانہ وٹہ، قحانہ جنگلی جوئے، قحانہ طولانی جوئے، قحانہ گلپانڈری ضلع جوئے، قحانہ طولانی جوئے نوٹس لائن ڈگری جبریتال عمل نامہ

یانا گناہ ASI بلینڈ خان کی عمر عدہ بلوریت دن شاہ سال کے دوران

پندرہ اچھی کارکردگیاں اور تحریفی اسنادیں نواز گناہ اور سزایابیوں کی تعداد بارہ ہیں جن میں کوئی سنگین سزایابی میں سے عدہ متعینہ علیہ

مور 20/8/86 جسم ATC (2) PC 5 (2) کا ایسی نوٹس میں ایک عالم شدہ میں بھی ہو چکا ہے

(2) ASI محمد رفیق حال متعینہ نوٹس لائن تاریخ جبری مور 4/1991 ریکورڈ کوری 2/7/92 لوئر کوری 10/97، انڈر سٹڈنٹ سکول کوری 20/2010

تعیناتیاں : نوٹس لائن، جوگی سواتی، قحانہ تارہ گی، نوٹس لائن مغل جوگی گلپانڈری، نوٹس لائن ڈگری، جوگی بگڑہ، لوئر کوری

Dr. Superintend Hqs.

9

(27)

بجارج گاردری کوٹ (10) ڈسٹرکٹ سکول (11) مدد خانہ ڈگر
(12) گاردری (13) ایچ جی ٹوہائی (14) معطل لائن (15) خانہ ڈگر
16 پولس لائن ڈگر نمبر حساب ASI کی عرصہ ملازمت مارچ 1991 سے
دن 22-07-28
میں اچھی کارکردگی، ترقی اسناد 5 ہے جبکہ بیڈ انٹریوں کی آمد 9 ہے
جو معقولی نوعیت کی سزیاں ہیں

(3) ASI انور سعید متعینہ پولس لائن تاریخ ہجرتی 4/1991، ریکورڈ کوری
31/3/1992، لوٹر سکول کوری 10/99، انٹر میڈیٹ سکول کوری 9/20

تعمیرات :- 1 پولس لائن ڈگر (2) سکول کوری (3) خانہ طیلانی (4) جوگی
سنگھ (5) پولس لائن ڈگر (6) جوگی گاگرہ (7) خانہ ڈگر (8) پولس لائن ڈگر
(9) پولس لائن ڈگر (10) شریک شاف (11) ایچ جی ڈوری گورڈم پولس لائن ڈگر
(12) انٹر میڈیٹ سکول کوری (13) جوگی سواری (14) خانہ ڈگر (15) خانہ ڈگر
(16) خانہ گاگرہ (17) پولس لائن ڈگر ASI انور سعید دن 22-07-28 سال
ملازمت سے دوران اچھی کارکردگی اور ترقی اسناد بہ قدر 2 سے نوازا گیا
جبکہ بیڈ انٹریاں کل 4 ہیں جو معقولی نوعیت کے ہیں

(4) ASI محمد زاہد متعینہ پولس لائن تاریخ ہجرتی 3/1991، ریکورڈ کوری
31/3/1992، لوٹر سکول کوری 4/20، انٹر میڈیٹ سکول کوری 9/20

تعمیرات :- 1 پولس لائن ڈگر (2) خانہ پیرایا (3) گاردری (4) MHC
پیرایا (5) خانہ تادہ (6) شریک شاف (7) گاردری (8) انٹر میڈیٹ کوری
(9) راء انٹر میڈیٹ (10) RTN تادہ (11) سرہ خانہ (12) اسیہ (13) بگر (14) پولس لائن
ASI محمد زاہد کی عرصہ ملازمت دن 22-07-28 سال سے دوران اچھی کارکردگی اور ترقی
اسناد 11 ہے جبکہ بیڈ انٹریاں کل 4 اور معقولی نوعیت کے ہیں

(5) ASI زینت اختر خان متعینہ حال پولس لائن ڈگر تاریخ ہجرتی 4/1991
ریکورڈ کوری 3/92، لوٹر سکول کوری 11/97، انٹر میڈیٹ کوری 3/20

تعمیرات (1) پولس لائن DAR (2) بدل جوگی (3) MTC پولس لائن

ATTACHED

Cyber
DSP/HB
Dr. Superintendent
Hoya, D.

27

28

تھانہ طوطا لہری (5) DFCC فارمٹ ایجنٹس (6) کوئٹہ سکول کورس
 (7) پولیس لائن (8) تھانہ ناوہ گی (9) نائب کورٹ SDM (10) گاڈو
 کنگلہ گلہری (11) جوگی ٹورسٹ (12) تھانہ طوطا لہری (13) نائب ورننگ ماسٹر (14) سپر
 ورننگ YRK (15) نائب کورٹ (16) سپر ورننگ ایس ایس (17) ورننگ ماسٹر سکول جوگی
 (18) CRO (19) OASI (20) لاٹک لیو ڈوٹا (21) جوگی تڈال (22) تھانہ
 گلہری (23) تھانہ تگڑی (24) تھانہ طوطا لہری (25) پولیس لائن

ASI تربیت لہری کی عمر 29 سال 28 دن 22 گھنٹے ہے اچھی کارکردگی اور تعریفی
 کل نوٹس ہے جبکہ مجموعی نوٹس کے تین سزائیاں ہیں

6 خان شہر 29/11/96 متعینہ پولیس لائن ڈگری تاریخ ہجرتی 7/9/1996
 کوئٹہ سکول کورس 28/4/1997
 25/3/2005

تعمینات: 1 پولیس لائن 2 منگرنٹ کورس (3) ٹریفک کورس
 (4) جوگی سواتی (5) تھانہ ڈگر (6) پولیس لائن شکایتا (7) جوگی گاگرہ (8) لوہ
 سکول کورس 9 ٹریفک (10) گاڈو سرہ تھانہ (11) MAM گاگرہ (12) سوات
 (13) جوگی جینٹلز (14) جوگی گاگرہ (15) AMHC جوگی (16) MHC سواتی
 (17) تھانہ جوگی (18) جوگی سواتی (19) MHC جسنگلی (20) MHC جوگی
 (21) پولیس لائن

خان شہر 29/11/96 کی عمر 29 سال 24 دن 17 گھنٹے ہے اچھی کارکردگی
 ہے جبکہ سزائیاں 2 اور مجموعی نوٹس ہے

7 HCL شہر 174 متعینہ پولیس لائن تاریخ ہجرتی 9/1/1981
 کورس 20/3/1992 گیس اور سٹیشن کمانڈر کورس سبز بلاڈن کمانڈر کورس
 پاس کر کے سال 2000 میں بہ طرہ HCL ترقیاب سوائے اچھی کارکردگی /
 تعریفی اسناد کی تعداد 23 ہے اور مجموعی نوٹس ہے سزائیاں کی
 تعداد گیارہ ہے جبکہ تعینات بہ سہیل علی آفر ہے

Copy
 DSI/HCP
 Dy. Superintendent
 Hujay, Dagr

APPROVED

(7)

H.C. شہرہ کی عرصہ ملازمت 28 02 2006 سال ہیں جبکہ تعیناتیاں پولیس لائسنس
 جوئی سواری، پبلک سروس، پولیس لائسنس، جوئی پوسٹ، خزانہ گادر، کننگری گادر،
 طوطی گادر، گادر سیشن، جج مہلب پولیس لائسنس گادر، خزانہ گادر، پولیس لائسنس، جوئی
 سواری، گادر نوان کچھ، جوئی سواری، گادر لے ڈیپ، پولیس لائسنس، گادر
 خانانو ڈھری، گادر درمائی، جیک بوسٹ دو کڑہ، گادر درمائی، جوئی پوسٹ
 جوئی سواری، جیک بوسٹ جوصلہ گادر خانانو ڈھری، گادر درمائی، گادر سروس
 گادر کنگری لائسنس

(8)

H.C. شہر افضل مستحقہ پولیس لائسنس تاریخ ہجرتی 11/08/1991 بریکرٹ
 396
 کوری 8/11/1992 نا فرائڈ ہڈ کٹیل سے تفصیل تعیناتیاں نسبت نزل
 جیک بوسٹ کٹار، CP آمبلہ، جوئی بگڑہ، گادر درمائی، گادر سروس
 خانہ طوطی، گادر DSP طوطی، جوئی پوسٹ، گادر کھپ کو کا بوجہ علیہ حاضر
 بر خاستگی خوش 5/09/2009 عروبانہ بحالی موجود 29/08/2009 خانہ طوطی، گادر
 خانانو ڈھری، بترقیانی آج عورج 27/10/2007 خانہ پیر بلایا، خانہ جیک، گادر
 خانانو ڈھری، خانانو ڈھری، گادر درمائی، لائسنس، گادر درمائی، پولیس
 لائسنس شہر افضل کی عرصہ ملازمت 28 03 2006 سال انھی گادر دگیان کی
 خزانہ گادر دگیان سولہ

(9)

خسرو سید 372 H.C. مستحقہ پولیس لائسنس ڈگر تاریخ ہجرتی 5/7/1996
 بریکرٹ کوری 29/4/1997 نوٹر کوری 20/9/2003 H.C. خسرو سید 372 کی
 تعیناتوں کی تفصیل نسبت نزل
 پولیس لائسنس ڈگر، کوری خنگری، نوٹر کوری، پولیس لائسنس، گادر
 نوان پچھ، جوئی سواری، جوئی پچھ، گادر ADI پوسٹ، گادر کننگری
 جوئی نوٹر پوسٹ، گادر درمائی، گادر ADI پوسٹ، خانہ ڈگر، STF
 خانہ طوطی، مدد خزانہ پیر بلایا، نائب کوری سیشن، خانہ ڈگر

Signature
 DSP/Her
 Dy. Superintendent
 Hqs, Dagr

ATTESTED

(8)

درجہ کی سینئر ڈیپوٹنٹ ایف ڈی، مددگار خزانہ گارجن، مددگار خزانہ ناہنگ پور
 AMHC خزانہ ڈگری، خزانہ ناہنگ پور، نائب کرپس سٹیشن بچ، خزانہ ڈگری، پولیس لائن
 بحریہ سید 373 HC کی عرصہ ملازمت 17.4 دن تاہ سال 17.4 سے اچھی کارکردگی کو
 جبکہ بیڈ انٹری نہیں ہے

(10)

HC شہرولی نگر 173 احتیاج پولیس لائن ڈگری تاریخ ہجرتی 1/9/1991
 ریکورڈ کوریس 20.3 ناچاندرہ ہے جس سے مورخ 6/11/1982 کو بحریہ سید 353 جنم
 (جنم) 307-34 PP خزانہ ڈگری شہر استہاری فریڈ درہ صدر، سید پر خزانہ زنی کرت
 شہر ہمار کرت اسی (ننگہ دیگر شہریات استہاری کسی اسے تھیڈرات کے خاطر
 کنٹیل شہرولی نگر 173 HC پر خزانہ ڈگری کرنا شہر زنی کیا اسکیں شہر استہاری
 کو حرات سے تھیڈرات میں کامیابی نہیں ہوئی اس کارکردگی کی بنیاد پر شہرولی نگر
 بحالہ 0897 مورخ 10/10/96 نہ تھیڈرات کی کنٹیل شہریات کیا گیا ہے (نحال تاہ
 میں اچھی کارکردگی کا اندراج (9) جبکہ سزایا بیوں کی تعداد (18) ہے عرصہ
 ملازمت 28 دن تاہ سال ہے 32

لعیناتان، گارڈزوں کھی، خزانہ ڈگری، گارڈ بانٹورس، گارڈ آفیسر، چوکی بلنگہ
 پولیس لائن، گارڈ آفیسر، CP کراچی، گارڈزوں کھی پولیس لائن
 گارڈ علی کوٹ، پولیس لائن، گارڈ بڈز، گارڈ بڈز، خزانہ ڈگری،
 شکایتی پولیس لائن، گارڈ لیگانڈ، خزانہ طوطا، CP سر خزانہ شکایتی پولیس
 خزانہ پیر بابا، پولیس لائن فطعل، گارڈزوں کھی، پولیس لائن،
 گارڈ بڈز، پولیس لائن، گارڈ کالنگم، پولیس لائن، گارڈ کلین کتھو
 پولیس لائن

(11)

آفات خان نگر 265 احتیاج پولیس لائن ڈگری تاریخ ہجرتی 12/7/2000
 ریکورڈ کوریس 20.4 لوٹر کوریس 25.9 عرصہ ملازمت 17 دن تاہ سال 17
 سے جبکہ اچھی کارکردگی کی بنیاد پر سزایا بیوں (3) ہے لعیناتوں کی تحصیل
 سے ریل سے پولیس لائن، سکویٹی سٹان، سنگر پورٹ کوریس پشاور

Supintendent of
 Hary Daggar

APPROVED

بی سراج، ڈرن کورس ہنگو، پولیس ذاتی، کونٹرول کورس، پولیس ذاتی
 ڈاؤن ٹی ٹی سی ہنگو، پولیس ذاتی، مددگار کھار، ڈگر، انسٹرکٹرز
 مددگار جوئی بڈل، مددگار کھار بہرہ، ثابت AD پولیس ذاتی
 مگھڑ، پولیس ذاتی، جوئی بڈل اور پولیس ذاتی
 الزام علیحدہ ملازمت پولیس (حاکمان اعلیٰ / ادنیٰ) بددیانتوں سے الزام
 سوری، پورٹ خصوصوں پر سوشل میڈیا کو جسٹ اڈیکم انڈین بلا ہاجبان
 میں لاق ڈگر کلوز ہو چکے ہیں اور یہ خبر پولیس اہلکاروں کے علاوہ عوام الناس
 کا لوگ تک پہنچی ہے کہ الزام علیحدہ ملازمت پولیس کے خلاف کریشن کے
 الزام میں انڈوسٹری شروع ہے لیکن بحال کسی پورٹ سٹیم سے انکے خلاف
 بیان تیار نہیں کیا یا الزام علیحدہ ملازمت پولیس کے بحال مانے اور جوئی بڈل
 مطالعہ ہو کر پلیڈر حقائق SI کے خلاف مقدمہ عیلت 36 جو 9 جنم (2) 1611P/5
 قدامت انٹی کریشن سیدر شریف سوات میں قبیل ایک سو 100 روپیہ رشوت ستانی سے الزام
 پر قائم ہو کر جس میں مجرم جو 10 87 بعدلت سیشن بح / پٹیل جیم ACE NW
 پشاور سیری کیا گیا ہے بقایا الزام علیحدہ سے اعمال ناموں اور خوشی متلوں میں
 کریشن کے بارے جواد میں بلی ہے
 الزام علیحدہ ملازمت پولیس کے خلاف انکے تعیناتوں کے معائن کریشن کے
 الزامات کی ریویوٹنگ خصوصوں ہو چکے ہیں بدین وجہ الزام علیحدہ ملازمت پولیس
 کی ریویوٹنگ تھی ہے اور فیملی ملازمت پولیس کے معائنوں میں ہیں انڈوسٹری پورٹ

عفیہ
 DSP/HQ
 13
 ATTACHED

ORDER

32

This order will dispose off, departmental enquiry conducted by D.SP Hqr: against the following officers/officials regarding their involvement under the charges of corruption, according to the source report with issuing proper charge sheet / summary of allegations vide this office No. 572-82/EC, dated 28.11.2013.

1. SI Balizar Khan
2. ASI Muhammad Wahab
3. ASI Anwar Saeed
4. ASI Muhammad Zahid
5. ASI Zeb Ahmad
6. HC Khan Sher No. 29
7. ~~HC Sher Muhammad No. 174~~
8. FC Sher Afzal No. 396
9. HC Bahrawar Said No. 372
10. HC Sher Wali No. 173
11. HC Aman Khan No. 265

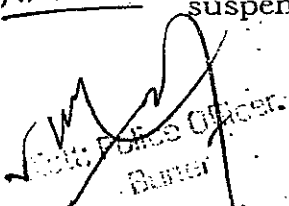
On 30.11.2013 the E.O submitted finding with the conclusion that various types of complaints against the above officers /officials have been received regarding corruption during their period of posting and thus the E.O recommended their names that they are not fit for further field duties.

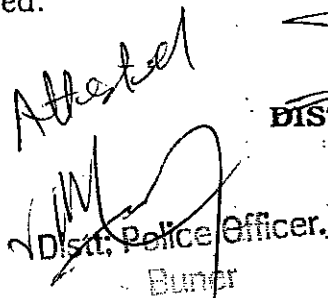
I Asif Iqbal Mohmand District Police Officer, Buner competent authority see no reasons to believe that the defaulters all above concerned could improve their view and change their behaviors in future.

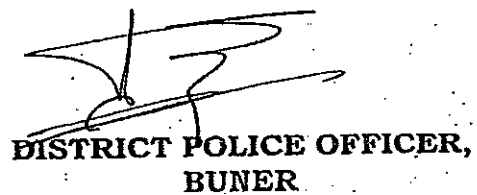
Therefore, I agree with the recommendations of the Enquiry Officer and award major punishment to all above defaulter's officers / official's i-e compulsory retirement from service from the date of their suspension with immediate effect.

Order announced.

Attested


District Police Officer,
Buner

Attested

District Police Officer,
Buner


DISTRICT POLICE OFFICER,
BUNER

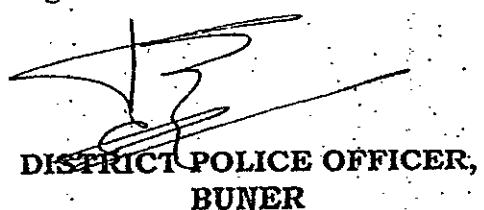
OB No. 158

Dated 6.12 /2013.

No 2392-84 E,

Copy of the above is submitted for favour of information to:

1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer, Malakand Region at Saidu Sharif Swat
3. All concerned.


DISTRICT POLICE OFFICER,
BUNER

33 (5)

COMMENDATION CERTIFICATE K.P.K Police



Class III

Granted to ASI Spx Muhammad Khan

Son of _____ R/O Village _____

Police Station Nauqari District Buner

In Recognition of His good duty

Cash Reward Rs-100/-

O.B No 142

DATED 14-10-2013

**District Police Officer
Buner**

Granted by Mr. Aziz Iqbal Mohmand DPO Buner

**HEAD CLERK
P.O. OFFICE BUNER**

34

COMMENDATION CERTIFICATE K.P.K Police



Class III

Granted to ASI Shez Muhammad Khan

Son of _____ R/O Village _____


Police Station Nawazgai District Buner

In Recognition of His good performance

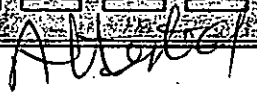
Cash Reward Rs - 500/-

O.B No 122

DATED 30-8-2013


District Police Officer
District Police Officer
Buner

Granted by Mr. Asif Iqbal Mohammad DPO Buner


HEAD CLERK,
OFFICE BUNER.

COMMENDATION CERTIFICATE

K.P.K Police

35



Class III

Granted to Asi SHER MUHAMMAD KHAN.

Son of _____ R/O Village _____


Police Station Pisbaba District BUNER.

In Recognition of His good performance in case FIR No. 98NSA Pisbaba.


Cash Reward Rs 200/-

O.B No 55

DATED 17.5.13


District Police Officer
Buner

Granted by M. TEHAN ZEB KHAN BANGASH.


HEAD CLERK,
BUNER.

COMMENDATION CERTIFICATE

K.P.K Police

(36)



Class III

Granted to Asi LHER MUHAMMAD KHAN

Son of _____ R/O Village _____

Police Station Pirbaba District BUNER

In Recognition of His good Performance in Case FIR 56
dt 24th 03/13 4/5 392-394/208
Ps Pirbaba.

Cash Reward RS 500/-

O.B No 34

DATED 6.3.013

Distrtict Police Officer
P/ Buner

Granted by MR JEHANZEB KHAN BANGASH

Attested
[Signature]
S.P. OFFICE BUNER

COMMENDATION CERTIFICATE

K.P.K Police

37



Handwritten signature and date: 4.5.03

Class III

Granted to SAIB MUHAMMAD KHAN ASI

Son of _____ R/O Village _____

Police Station Pirbaba District Buner

In Recognition of His good performance in case

Cash Reward Rs 300/- FIR 36 DT 8² CB 4/5 9 BUNSA
13AC

O.B No 37

DATED 4.3.03

Handwritten signature
District Police Officer
Buner

Granted by SAIB MUHAMMAD KHAN ASI D.P.O. Buner

Handwritten signature
HEAD QUARTERS,
S.P.O. OFFICE BUNER.

COMMENDATION CERTIFICATE
N.W.F.P POLICE

38



CLASS-III


Granted to SHER MEHAMEAD KHAN ASI
Son of SHRIF U ALLAH **R/O Village** Y/O KHANANO DEHRAI
Police Station NAWAGAI **District** BUNER
In recognition of FOR HIS GOOD PERFORMANCE DURING POSTING
TO POLICE POST KHANANO DEHRAI.

Cash Reward 500/-

OB No. 145

Dated 23.12.2009


District Police Officer,
Buner.

Attended

HEAD CLERK
POLICE BUNER.

Granted by MR: FALAK NAZ KHAN DPO/BUNER

39

N.W.F.P.
COMMENDATION CERTIFICATE

Granted to Mr. Sher Mohammad (174 HC) S/O Sharif Ullah Khan R/O Village, Tehsil & Police Station Daggar District Buner. in recognition of Good Performance and very dutiful.

Granted cash award Rs. 500/-

Date: 6 /05/1996.

Handwritten notes:
- in J... 56
- HC
- 6/5

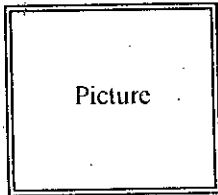
Handwritten signature: Attested
Stamp: HEAD CLERK, P.O. OFFICE BUNER.

Signature: Ghulam Farooq Khan
Ghulam Farooq Khan
Deputy Commissioner,
Buner. DEPUTY COMMISSIONER
BUNER, DAGGAR

Handwritten: 8/6/5

TO HOME IT MAY CONCERN

It is certified that Sher Muhammad H.C-174 of Bunir Police has seen functioning as anchorage of the security Guard of Session House Bunir. I have found him dutiful, obedient, honest and all hard working. I therefor record this certificate in recognition of him said service s.



Muhammad Nawaz Khan
(MUHAMMAD NAWAZ KHAN)
Distt & Session Judge
Bunir Ad Daggar
District & Sessions Judge,
Bunir at Daggar.

Attested

8/2/2002

[Signature]
NEED CLERK
OFFICE BUNIR.

41

COMMENDATION CERTIFICATE.

This commendation Certificate is granted to
Sher Muhammad Khan Head Constable No. 174 in
recognition of his good performance.

He is also granted cash award of Rs.200/-.

جواب عالی
سرکار عالی
شیر محمد 174

S. M. Khan
(SAID MAROOF)
DISTRICT & SESSIONS JUDGE,
MUNIR AT DAGGAR,
District of Sessions Judge
MUNIR AT DAGGAR.
Attested
HEAD CLERK,
POLICE STATION.

OFFICE OF THE DEPUTY COMMISSIONER BUNER.
AT DAGGAR.

(42)

Granted to Mr. Sher Mohammad (174 C2-F.C) S/O
Sharif Ullah R/O Village, P.O & Tehsil Dagggar Police Station Dagggar
District Buner. In recognition of Good performance during the visit
of Chief Minister N.W.F.P. to Kulyari Buner.

Granted cash award Rs. 100/-

Dated 10 /07/1996.

Attended
[Signature]
HEAD CLERK,
OFFICE BUNER.

[Signature]

(ZAIN KHAN KHALIL)
DEPUTY COMMISSIONER,
BUNER.

43

**To: The Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.**

**To: All District Police Officers,
in Malakand Region (except Chitral).**

No. 1635-40/E, dated Saidu Sharif, the 13/2 /2010.

**Subject: RECOMMENDATION FOR PROMOTION ON ACCOUNT OF
OUT-STANDING PERFORMANCE/PRESENCE IN
INSURGENCY DURING 2009.**

Memorandum:

The lists of officers, upper and lower subordinates already recommended for accelerate promotion in the light of Chief Minister's NWFP directives received vide your offices letter mentioned below for necessary action:-

| <u>S/No</u> | <u>Name of Office.</u> | <u>Letter No.</u> | <u>Dated.</u> |
|-------------|------------------------|-------------------|---------------|
| 1. | DPO, Swat | 4319/E, | 18/07/2009 |
| | | 4460/E, | 21/07/2009 |
| 2. | DPO, Dir Lower | 2803/E, | 17/07/2009 |
| 3. | DPO, Dir Upper | 2659/E, | 17/07/2009 |
| 4. | DPO, Bunir | 2630/E, | 18/07/2009 |
| | DPO, Shangla | 730/E, | 17/07/2009 |

You are directed to prepare the working papers of all these officers/officials on the attached proforma and submit to this office through special messenger not by fax which must reach upto Monday i.e 16/02/2010 positively.

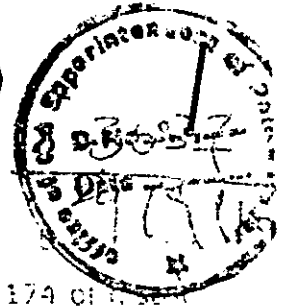
EC
For compliance on date said.
DPO/Buner
13/2/2010

Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat.

ATTESTED

3
34
35
37
38

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ORDER

As recommended by the District Police Officer, Buner, in Memo No. 1325/EB dated 30/06/2010 that HC Sher Khan mad No. 174 of District Buner is a hard worker, and takes keen interest in his official duty. He has obtained a plot of land measuring 13 Marlas adjacent to Police Building free of cost. The plot is situated with the government land. Therefore the HC's granted should be cancelled at his own pay and scale with immediate effect.

J. o
Jamilur

(QAZI JAMILUR RAHMAN)
Deputy Inspector General of Police,
Malakand Region, Saidu Sharif, Swat

Mem. No. 9837/EB
dated 23/9/2010.

Copy to the District Police Officer, Buner for information and for necessary action with reference to his Memo No. 4875/EB dated 30.06.2010.

98/102

J

23/9

OB 102-150
M/A 24/9
2010.

Jamilur

ORDER

As recommended by the District Police Office Memo No.4825/EB dated 30/06/2010 that HC Sher Muhammad No. 174 of district Buner is a hard worker and takes keen interest in his official duty . He has obtained a piece of land measuring 13 marlas adjacent to Police Building free of cost and included with the government land. Therefore the HC is granted shoulder promotion as ASI in his own pay and scale with immediate efface.

(QAZI JAMILUR RAHMAN)

Deputy Inspector General of Police

Malakand Region, Saidu Sharif, Swat

No. 8837/E

Dated 23/9/2010

Copy to the District Police Officer Buner for information and necessary action with reference to his Metter: No.4825/EB dated 30/06/2010

45

From: The District Police Officer,
Buner.

To: The Deputy Inspector General of Police,
Malakand Region Swat.

No. 4825 /SB dated Daggar the 30/06/2010.

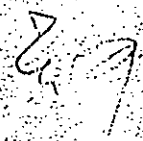
Subject: SHOULDER PROMOTION

Memo: Kindly refer to Rang office Memo No. 174/E dated
22.06.2010.

On recommendation of Mr. Jehangir Khan the then
DSP Circle Totalai HC Sher Muhammad No. 174, who posted to
patrolling police post Khanano Dehrai was given shoulder promotion
vide this office OB No. 82 dated 28.07.2009 on account of his good
performance during the past insurgency in Buner district.

As per directions of the then worthy Deputy
Inspector General of Police, Malakand Region Swat vide Memo No.
8436-41/E, dated 05.11.2009, the shoulder promotion of the applicant
alongwith other colleague was withdrawn vide this office OB No. 5
dated 13.01.2010 and a copy of the same was endorsed to Regional
office vide Endost: No. 330-32/E, dated 13.01.2010.

HC Sher Muhammad is a hard worker and take keen
interest in his official duties. He has obtained a piece of land measuring
13 marla adjacent to police building free of cost and included with the
Govt. land. His these efforts are commendable. To acknowledge his
interest and for this encouragement and keeping in view the
recommendations made by SDPO Totalai, SHO Nawagai he is therefore
recommended for shoulder promotion as ASI in his own rank and pay
scale please.


District Police Officer,
Buner.

ATTESTED

From: The District Police Officer,
Buner.

To: The Deputy Inspector General of Police
Malakand Region Swat

No. 4825 / EB dated Daggar the 30/06/2010

Subject: SHOULDER PROMOTION

Memo:-

Kindly refer to Rang officer Memo: no.1714/E, dated
22.06.2010.

On recommendation of Mr. Jehangir Khan the then DSP Circle Totatai HC Sher Muhammad No. 174 were posted to patrolling police post Khanano Dehrai was given shoulder promotion vide this officer OB no.82 dated 28.07.2009 on accouter of his good performance during the past insurgency in Buner distict.

As per directions of the then worthy Deputy Inspector General of Police, Malakand Region Swat vide Memo: No. 8436-41/E, dated 05.11.2009, the shoulder promotion of the appellant alongwith other colleague was withdrawn vide this office OB No.5 dated 13.01.2010 and copy of the same was endorsed to Regional office vide Endost: No. 330-32/E, dated 13.01.2010.

HC Sher Muhammad is a hard worker ans take keen interest in his official duties. He has obtained piece of land measuring 13 marlas adjacent to police building free of cost and included with the Govt: land. His these efforts are commendable. To a knowledge his interest and for this encouragement and keeping in view the recommendation as made by SDPO Totatai, SHO Nawagai he is therefore recommended for shoulder promotion as ASI in his own rank and pay scale please.

District Police Officer

Buner.

46

ORDER

C-II Head Constable Sher Muhammad NO.174 is hereby given special promotion as ASI due to his good performance during his last service i.e recovery of narcotic and timber as well as the present prevailing situation in the district as per recommendation of the SHO and D.S.P. Circle Totalai.

District Police Officer
Buner

O.B. NO 82

Date: 28/7/2009

ATTESTED

ORDER

C-II Head Constable Sher Muhammad No. 174 is hereby given shoulder promotion as ASI due to his good performance during his last service i.e recovery of narcotic and timber as well as the person prevailing satiations in the district as per recommendation of the D.S.P Circle Totatai.

District Police Officer

Buner.

From: The District Police Officer,
Buner.

(47)

To: The Deputy Inspector General of Police,
Malakand Region-III, Swat.

No. 2513 /EC, dated Daggar the 13/05 /2011.

Subject: - **PROMOTION AS ASI /PLATOON COMMANDER**

Memo:-

ASI /PC Feroz Shah No. 186 of this district police has been completed three years tenure on 07.04.2011 according stating order No. 1/2006. Therefore the following Head Constables who have qualified Section/ Platoon Commander Course are nominated for promotions as ASI / Platoon commander.

| S # | Name and No. | Date of Birth | Date of Enlistment | Courses | Entries | |
|-----|--------------------------|---------------|--------------------|------------------------------------|---------|-----|
| | | | | | Good | Bad |
| 1 | HC Finda Shah No.98 | 12.09.1961 | 12.09.1979 | Section /Platoon commander courses | 3 | 4 |
| 2 | HC Sher Muhammad No. 174 | 16.08.1962 | 01.09.1981 | -do- | 20 | 11 |

It is therefore requested that one of the above ^{Head} constable may kindly be promoted as ASI /Platoon Commander according to standing order No. 1 of 2006 Please.


District Police Officer,
Buner.

ATTESTED

At
To
E

48

بھخور جناب ریجنل پولیس آفسر صاحب ملاکنڈ بمقام سید و شریف سوات

سائیل۔ شیر محمد سابقہ HC/C-II ڈیپارٹمنٹ بونیر نمبر 174 ساکن ڈگر ضلع بونیر

عنوان۔ درخواست بدیں مراد کہ حکم نمبری 159 مورخہ 06.12.2013 بجاریہ ڈی۔ پی۔ او صاحب ضلع بونیر کو کلہدم قرار دیا جا کر سائیل کو اپنی ملازمت پر بحال کرنا۔

جناب عالی!

معروض خدمت ہوں۔۔۔

کہ میں بحیثیت کانسٹیبل سال 01.09.1981 میں سوات پولیس میں بھرتی ہو کر فراغت پر مختلف تھانہ جات اور گاردات میں ڈیوٹی انجام دیتا رہا۔ سال 1993 میں سیکشن کمانڈر کورس، پلاٹون کمانڈر کورس اور ٹیڑگیس کورس پاس کرنے کے بعد سال 2000 میں ناخواندہ C-II ہیڈ کانسٹیبل ترقیاب ہوا۔ بعد اچھی کارکردگی اور پولیس چوکی خانانو ڈھیری کے مصل اراضی کل 13 مرلے خوانین خانانو ڈھیری سے اپنے ذاتی اثر سوخ پر حاصل کر کے باقاعدہ محکمہ مال میں پولیس کی نام انتقال کیا ہے۔ اس بناء پر ڈی۔ آئی۔ جی صاحب ملاکنڈ ریجن نے بحوالہ آرڈر نمبری 8837/E مورخہ 23.09.2010 کو بحیثیت شوٹڈر پروموشن ASI ترقیاب کیا ہے۔

حال ہی میں پولیس پٹرولنگ پوسٹ کو گامپ میں تعیناتی کے دوران جناب ڈی۔ پی۔ او صاحب بونیر نے اچھی کارکردگی کی بناء پر سرٹیفکیٹ اور ساتھ انعامات سے نوازا ہے۔ چونکہ سائیل ناخواندہ پولیس افسر ہے۔ اور زیادہ تر پٹرولنگ پوسٹوں اور پولیس لائن سے ملحقہ گاردات میں تعینات رہ کر گشت کرتا رہا ہے۔ دوران ڈیوٹی وقتاً فوقتاً پولیس افسران نے اچھی کارکردگی کی بناء پر بھی سرٹیفکیٹ اور انعامات سے نوازا ہے۔ اور ایک خواندہ پولیس افسر کے مقابلہ میں سائیل کی کارکردگی متعلق برآمدگی منشیات اسلحہ ایمنیشن نمبر وغیرہ قابل تعریف ہیں۔ اس کے علاوہ میں نے جہاں بھی جس افسر کے ساتھ ڈیوٹی کی ہے اس میں انتہائی سینئر افسران سیشن جج صاحبان، ڈی۔ سی۔ او صاحبان نے میرے احسن ڈیوٹی اور ایمانداری کی تعریف کرنے کے ساتھ ساتھ انعامات اور سرٹیفکیٹ سے نوازا ہے۔

گزشتہ ایئر جنسی اور خراب حالات میں دلیری سے ڈیوٹی انجام دیتے ہوئے ڈی۔ پی۔ او صاحب بونیر نے مورخہ 19.02.2010 کو دن سٹف پروموشن کے لئے دیگر اہلکاران پولیس کے ساتھ میرا نام بھی شامل ہے۔

ان جملہ کارکردگی کے ساتھ مورخہ 21.10.2013 کو سائیل پولیس لائن تبدیل کیا گیا۔ مورخہ 23.10.2013 کو جناب ڈی۔ پی۔ او صاحب کی طرف سے شوکاژ نوٹس موصول ہو کر جس پر اپنا تفصیلی جواب تحریر کر کے افسران بالا کو اپنی بے گناہی پیش کی۔ لیکن اس کے بعد 28.11.2013 کو مجھ پر چارج شیٹ تقسیم ہو کر اس کا بھی تفصیلی جواب دیا۔ لیکن افسران بالا میرے ساتھ متفق نہ ہو کر میرے خلاف بڑیہ ڈی۔ ایس۔ پی ہیڈ کوارٹر انکوآری کی گئی۔ بدوران انکوآری نہ میرے خلاف کسی نے کرپشن کی الزام عائد کی اور نہ انکوآری افسر کو بیان دیا۔ لیکن بغیر کسی شہادت اور ثبوت کے مورخہ 05.12.2013 کو بحوالہ آرڈر نمبر 158 مجھے محظلم کر کے مورخہ 06.12.2013 کو بحوالہ آرڈر نمبر 159 ملازمت سے جبری ریٹائر ڈ کیا۔ جو میرے اور میرے خاندان کے ساتھ سراسر ظلم ہے۔

چونکہ میں ایک غریب گھرانے سے تعلق رکھتا ہوں اور میرے ذمہ پندرہ۔ بیس افراد کی کفالت ہے۔ جسکے لئے واحد میں اور میرا تنخواہ ذریعہ معاش تھا۔ جو میرے بچے زیر تعلیم ہے اور پنشن پر میرا گزارہ مشکل ہے۔ اور میرے بچوں کی تعلیم بھی متاثر ہوتا ہے۔ میں جسمانی طور پر تندرست ہوں اور ڈیوٹی بخوبی انجام دے سکتا ہوں۔

لہذا استدعا ہے کہ میرے اور میرے بچوں کے حال پر رحم فرما کر مجھے ملازمت پر بحال کرنے کا حکم صادر فرمایا جائے۔

العارض

آپکا فرمان بردار شیر محمد سابقہ ہیڈ کانسٹیبل
سکنہ ڈگر ضلع بونیر

10/12/13

Attested

HEAD CLERK,
P. OFFICE BUNER

Dica. No.

10995/E
dt 10-12-2013

49

1

OFFICE OF THE REGIONAL POLICE OFFICER, MALAKAND
REGION, AT SAIDU SHARIF SWAT

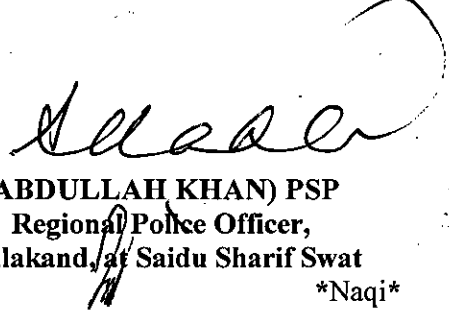
ORDER:

This order will dispose off the appeal preferred by Ex-HC Sher Muhammad No. 174 of Buner District for reinstatement in service.

Brief facts are that the above named Ex-Head Constable was found involved in corruption. His reputation was very bad among the people and too within the Police Department. He was issued proper charge sheet / statement of allegations. A proper departmental enquiry was conducted against him. The Enquiry Officer submitted his finding, reported that the appellant possess bad characters, involved in corruption, maintain bad reputation and took unfair / illegal advantage of his uniform. The Enquiry Officer further submitted that the appellant is corrupt and also not competent for field duties. The appellant was thus compulsory retired from service under Police Rules 1975 by the District Police officer, Buner vide his office OB No. 159 dated 06/12/2013.

The appellant was called in Orderly Room on 06/02/2014 and heard in person, but he did not produce any substantive materials in his defense. Therefore I uphold the order of District Police Officer, Buner, whereby the appellant has been awarded major punishment for compulsory retirement from service.

Order announced.


(ABDULLAH KHAN) PSP
Regional Police Officer,
Malakand, at Saidu Sharif Swat
Naqi

No. 1143-44 /E,

Dated 6/2 /2014.

Copy for information and necessary action to the:-

1. District Police Officer, Buner with reference to his office Memo: No. 27/EC, dated 01/01/2014.
2. Ex-HC Sher Muhammad No. 174 of Buner District.


ATTESTED

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 257/2014

Sher Mohammad s/o Sharif Ullah Ex-HC r/o village Daggar District Buner

.....Appellant

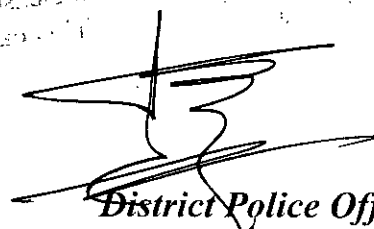
VERSUS

1. *The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.*
2. *The Regional Police Officer, (DIG) Malakand Region Swat.*
3. *The District Police Officer, Buner.*

..... Respondents

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| S# | DOCUMENTS | ANNEX | PAGE |
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| 2 | Affidavit | -- | 5 |
| 3 | Authority letter | -- | 6 |


District Police Officer
Buner
(Respondent No. 3)

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 257/2014

Sher Mohammad s/o Sharif Ullah Ex-HC r/o village Daggar District Buner

.....Appellant

VERSUS

1. The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer, (DIG) Malakand Region Swat.
3. The District Police Officer, Buner

..... Respondents

Parawise comments on behalf of Respondents No. 1, 2 & 3.

Respectfully Sheweth

Preliminary Objections:-

1. That the present appeal is time barred.
2. That the appeal is not maintainable in the present form.
3. That the appeal is bad due to misjoinder and non joinder of necessary parties.
4. That the order of the competent authority has got finality and cannot be challenged at this stage.
5. That the appellant has got no cause of action to file the present appeal
6. That the appellant has got no locus standi to file the present appeal.
7. That the appellant is estopped due to his own conduct to file appeal.
8. That the appeal is bad in the present form and is liable to be dismissed.
9. That the appellant has not come to this Honorable Tribunal with clean hands.

ON FACTS

1. Para No. 1 of the Appeal is correct to the extent of service record. The rest is incorrect.
2. Para No. 2 of the appeal is correct. The appellant was reported to have been involved in corruption, misuse of powers and other corrupt practices.

3. *In reply to Para No. 3 it is submitted that, the Respondent No. 3 received continued secret reports against the appellant regarding his involvement in corruption and misuse of powers. The public opinion and secret reports vehemently spoke about involvement of the appellant in corruption. Furthermore the appellant was bad reputed and there were persistent secret complaint against him.*
4. *Para No. 4 of the appeal is correct.*
5. *Para No. 5 of the appeal is correct to the extent that the appellant recorded his statement. A certificate issued by Junior Rank Officer in favour of the appellant could not absolve him from charges of corruption. The Respondent No. 3 had received satisfactory public complaints against the appellant regarding his involvement in briberies and corruption.*
6. *In reply to Para No. 6 it is submitted that, the Appellant was reported to have been involved in corruption, therefore on persistent complaints disciplinary action was taken against him by Respondent No. 3. The Enquiry Officer found out that there were complaint and allegations of corruption against the Appellant. The Appellant was thus rightly compulsorily retired from service.*
7. *Para No. 7 of the appeal is correct. The Respondent No. 2 rightly upheld the order of Respondent No. 3.*
8. *Needs no comments.*

On Grounds:


- A. *Incorrect. Orders of Respondents No. 2 & 3 are just, legal and according to law.*
- B. *Incorrect. The character of the appellant has always been questionable. There were allegations and complaints of corruption against the appellant. The reputation of the appellant among public was bad enough.*
- C. *Incorrect. There is no exceptional performance showed by the appellant during his service, rather he was involved in corruption.*
- D. *Certificates issued by few officers to the appellant do not mean that the appellant has been worthy of praise. Commendation certificates received by the appellant cannot wash away his bad reputation, involvement in corruption and unwarranted acts.*
- E. *The principals of natural justice require that every good work should be appreciated and wrong doers should be punished. At one stage the appellant might have performed efficiently followed by awards, whereas in the recent past there were continues complaints and secret reports regarding involvement of appellant in corruption, therefore he was compulsorily retired from service. The recent wrongs / guilt of the appellant cannot be washed through the previous good work if any.*
- F. *As replied and explained on ground No. E.*
- G. *Incorrect. The appellant has persistently been reported to have been involved in corruption and committed unwarranted acts.*
- H. *Correct to the extent of disciplinary action, closing to lines and conduct of Enquiry. The certificate issued in favour of the appellant by non-competent joiner rank Officers could not absolve him from allegation and charges.*
- I. *Incorrect. There were secret / source reports against the appellant which could not be disclosed in the public good and interest.*
- J. *Incorrect. Proper departmental proceedings were conducted against the appellant in accordance with rules. The appellant was involved in corruption. There has been no intention of the respondents to score points and please the Govt. rather to make clean the police department from corrupt elements.*
- K. *Incorrect. There has always been a policy of police department to take action against corrupt officers / officials with in police without any favour or disfavor.*

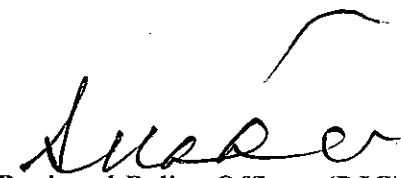
L. Incorrect. The appellant was involved in corruption and there were complaints against him. Moreover, the Enquiry officer also found out that there have been complaints against the appellant.

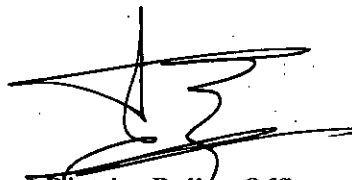
M. Incorrect. The appellant has rightly been compulsorily retired from service in accordance with Police Rules – 1975.

Prayer:-

In view of the above comments on facts and grounds it is therefore respectfully prayed that the appeal of the appellant may be dismissed with costs.


Inspector General of Police,
Khyber Pakhtunkhwa Peshawar
(Respondent No. 1)


Regional Police Officer, (DIG),
Malakand Region Swat
(Respondent No. 2)


District Police Officer,
Buner,
(Respondent No. 3)

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 257/2014

Sher Mohammad s/o Sharif Ullah Ex-HC r/o village Daggar District Buner

.....Appellant

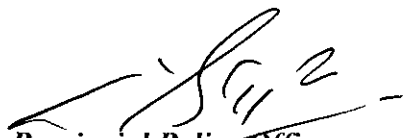
VERSUS

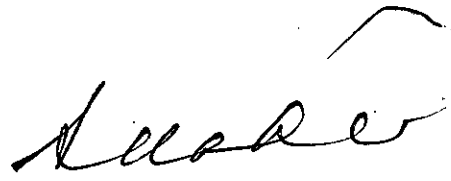
1. The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer, (DIG) Malakand Region Swat.
3. The District Police Officer, Buner

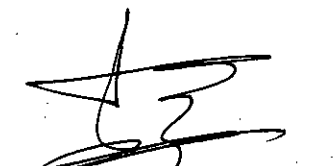
..... Respondents

✓ **AFFIDAVIT**

We the above respondents do hereby declare and solemnly affirm on oath that the contents of the reply to appeal No. 257/2014 are true / correct to the best of our knowledge / belief and nothing has been kept secret from the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar.


Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar
(Respondent No. 1)


Deputy Inspector General Of Police,
Malakand Region Swat
(Respondent No. 2)


District Police Officer,
Buner,
(Respondent No. 3)

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 257/2014

Sher Mohammad s/o Sharif Ullah Ex-HC r/o village Daggar District Buner

.....Appellant

VERSUS

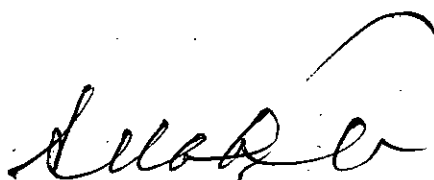
1. The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer, (DIG) Malakand Region Swat.
3. The District Police Officer, Buner

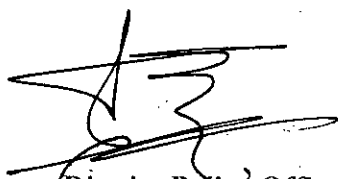
..... Respondents

AUTHORITY LETTER

We the above respondents do hereby authorize SI (Legal) Buner as representative of Police Department to appear in the court on our behalf and do whatever is needed in the court.


Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar
(Respondent No. 1)


Deputy Inspector General Of Police,
Malakand Region Swat
(Respondent No. 2)


District Police Officer,
Buner,
(Respondent No. 3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

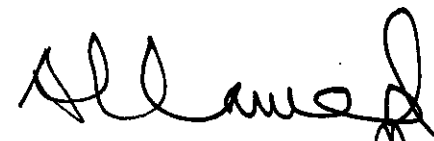

Service Appeal No. 257/2014

~~739-50~~
~~25-8-14~~

Sher Muhammad S/o Sarif Ullah, Ex-H.C, R/o Village Daggar
District Buner.....(Appellant)

VERSUS

The Inspector General of Police K.P.K
and others.....(Respondents)



26/8/14

APPLICATION FOR TRANSFER OF APPEAL
FROM BENCH-I, TO BENCH-II, WHERE
SERVICE APPEAL NO. 172/2014 OF
“KHAIR UR REHMAN..VS..INSPECTOR
GENERAL OF POLICE AND OTHERS”.

Respectfully Sheweth:

1. That the captioned appeal and other appeals like “Khair ur Rehman..VS..Inspector General of Police and others” Service Appeal No. 172/2014 and others having the same allegations and having finally been decided by the same appellate authority and their proceedings before two benches mailed to a conflating judgments, hence proprietary demands that these be heard by a single bench.


2. That the appeal of "Khair ur Rehman" bearing Service Appeal No. 172/2014 along with others are pending before this august Tribunal/ Bench-II, on 15/09/2014.

It is, therefore, humbly prayed that on acceptance of this application, this is requested that the captioned appeal may kindly be requisitioned from Bench-I to Bench-II to meets the ends of justice.

Appellant

Through

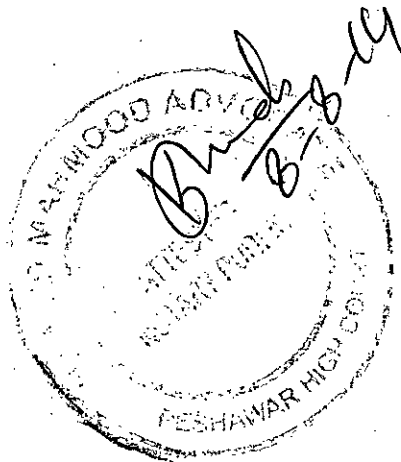
Dated: 08/08/2014


Sahibzada Asad Ullah
Advocate Supreme Court
Of Pakistan.

AFFIDAVIT:

I, Sahibzada Asad Ullah Advocate, Peshawar, as per instructions of my client, do hereby solemnly affirm and declare, that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


ADVOCATE



①

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE

TRIBUNAL, PESHAWAR

574
5-6-14

C.M No. ____/2014

In

S.A. No. 257 /2014

Sher Muhammad Khan.....(Petitioner)

VS

I.G.P and others.....(Respondents)

APPLICATION FOR EARLY HEARING.

Respectfully Sheweth:

1. That the above captioned appeal is pending adjudication before this august Tribunal which is fixed for hearing on 08/08/2014.
2. That the urgency is involved in the above appeal and delay will cause serious damage to appellant.

(2)


3. That other appeals pertaining to the same Division and District also pending before this august Tribunal titled Behar Ali and others vs D.P.O and others.

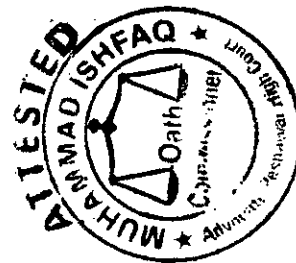
It is, therefore humbly prayed that on acceptance of this application the date may kindly be accelerated and the appeal may kindly be club with other appeals title above mentioned so that there will be no conflicting judgments on same issue.

Applicant

Through

Dated: 05/06/2014


Sahibzada Asadullah
Advocate, Supreme Court
of Pakistan



BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR

C.M No. _____/2014

In

S.A. No. 257 /2014


Sher Muhammad Khan.....(Petitioner)

VS

I.G.P and others.....(Respondents)

AFFIDAVIT

I, **Sahibzada Asadullah**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


ADVOCATE
3/06/2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Rejoinder

In

Service Appeal No.257/2014

Sher Muhammad.....VS.....I.G.P. K.P.K and others

REJOINEDER ON BEHALF OF
APPELLANT IN RESPONSE TO REPLY
FILED BY RESPONDENTS.

Respectfully Sheweth,

Preliminary Objections:

Preliminary Objections raised by answering respondents are erroneous and frivolous, the detailed replies thereof are as under:

1. That the appeal is with in time.
2. Para No. 2 is incorrect.
3. Para No.3 is incorrect, as all necessary and proper parties have been arrayed as respondents in the instant appeal, hence the question of mis-joinder and non-joinder is misconceived.
4. Para No.4 is incorrect, as the order passed is illegal, arbitrary and can be challenged at any time.
5. Para No.5 & 6 is incorrect being aggrieved the appellant has the cause of action to file the present appeal.
7. Para No.7 is incorrect as the matter pertains to terms and condition of service and there is no estoppel against the law.

8. That the appeal is competent in all respect and has been properly filed.
9. Para No.9 is incorrect the grievance of the appellant is genius and has come with clear hand.

On Facts:

1. Para 1 needs no explanation.
2. Para No.2 is incorrect as the allegation are baseless with no evidence.
3. Para No.3 is incorrect the respondents wanted to score to the provincial Govt, the allegations are baseless with no proof and no one came forward to support the allegations.
4. Para No.4 needs no reply.
5. Para No.5 to the extent of complaints is incorrect.
6. Para No.6 is baseless and incorrect.
7. Para No.7 is incorrect the orders are with out application on of mind to the facts and circumstances of the case.

On Grounds:

- A. Para No. A is incorrect.
- B. Para No. B is incorrect the allegations are false and baseless.
- C. Para No. C is incorrect the appellant has well explained his performance in the shape of documentary evidence.
- D. Para No. D is incorrect.
- E. Para No. E is incorrect the certificates show their performance and honesty.
- F. Para No. F is incorrect.

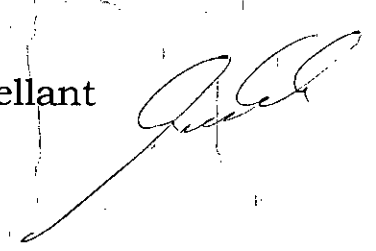
- G. Para No. G is incorrect no allegations have been supported by evidence oral as well as documentary.
- H. Para No. H is incorrect the efforts were only to score in the eyes of public that too at the cost of honest and trust worthy police officials.
- I. Para No. I is incorrect.
- J. Para No. J is incorrect the order is based on malafide and ulterior motive.
- K. Para No. K is incorrect as the appellant gas never involved in corruption.
- L. Para No. L is incorrect no proper enquiry was conducted.
- M. Para No. M is incorrect the orders are illegal with out legal backing.

It is, therefore, humbly preyed that the reply of answering Respondents may graciously be rejected and the appeal is prayed for may graciously be accepted with cost.

Dated: 15/09/2014

Through

Appellant


Sahibzada Asadullah
Advocate, Supreme Court
of Pakistan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Rejoinder

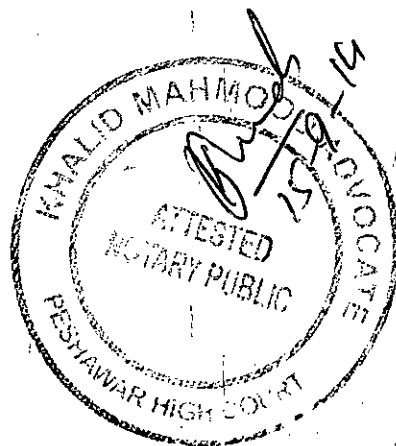
In

Service Appeal No.257/2014

Sher Muhammad.....VS.....I.G.P. K.P.K and others

AFFIDAVIT

I, **Sahibzada Asadullah** Advocate, as per information furnished by my client do hereby solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE