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.

<u>ANNOUNCED</u> 10|3.2015

MEIVIBER

MEMBER

22.12.2014

Junior to counsel for the appellant and Mr. 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.

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 2.2.2015.

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.

B

MEMBER

MEMBER

08.08.2014

Counsel for the appellant and Mr. Imranullah, SI (Legal) on behalf of the respondents with AAG present. Written reply/parawise 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

15.09.2014

Counsel for the appellant and Mr. Muhammad Adeel 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.

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.

Δ

MEMBER

24.11.2014

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.

Appenl No. 237/2014 Mr Dacel Almaicl
Clerk of counsel for the appellant present and requested for

16.04.2014

adjournment due to general strike of the Bar. To come up for preliminary hearing on 02.05.2014.

02.05.2014

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 21.02.2014. 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.

0205.2014

This case be put before the Final Bench_

for further proceedings.

Member

3.6.4

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Form- A FORM OF ORDER SHEET

Court of		
Case No	237/2014	

•	Court of			
••	Case No	237/2014		
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate		
1	2	3		
1	21/02/2014	The appeal of Mr. Zaib Ahmad presented today by Mr. Sahibzada Asadullah Advocate may be entered in the Institution		
		register and put up to the Worthy Chairman for preliminary hearing.		
2	26-2-201	This case is entrusted to Primary Bench for preliminary hearing to be put up there on		
		CHAIRMAN		
t				
1				

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 237/2014

Zaib Ahmad.....(Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

And others.....(Respondents)

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Appellant

Through

Dated: 14/02/2014

Sahibzada Asadullah Advocate Supreme Court

Of Pakistan.

Cell No. 0313-9772262

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 237/2014

251 2514

Zaib Ahmad S/o Noor Muhammad

R/o Village Shalbandi, 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:

2 |2 | IV FACTS:

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

1. That the appellant joined the Police Department on 01/04/1991 as constable and performed his duties at

various police stations with commitment and devotion. The appellant after passing A (1) and B (1) examinations was sent by the high-ups for his Lower Course. After completing his lower course in 1997 owing to the trust of the high-ups the appellant performed his duties whole heartedly finally in the year 2004 was promoted to the post of Head Constable.

- 2. That the appellant having thrust for success worked hard and in the year 2010 passed his intermediate examination was promoted to the post of ASI in 2011, throughout his career the appellant did his duties with honesty and punctuality.
- 3. 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 28/10/2013 to the show cause notice. (Copy of show cause and explanation are attached).
- 4. 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 28/11/2013. (Copy of charge sheet and reply of the appellant are attached).

- 5. 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).
- 6. 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).
- 7. That the inquiry officer prepared his finding report on 30/11/2013 where the 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 compulsory retired from service vide order dated

(4)

06/12/2013 from the date of their suspension. (Copies of inquiry report and order dated 06/12/2013 are attached).

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

GROUNDS:

- 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 1991 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 ASI, throughout his career the



high-ups trusted him and no complaints whatsoever was made against him during his stay at various police stations.

- That the appellant struggled hard and even retained his C. 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 and this is unfortunate to say that his brother Said Mohammad Khan SI was killed by the terrorist and even owing to a terrorist attack on police check post case F.I.R No. 409 dated 08/08/2008 u/s 302/324/353/404/148/149 PPC r/w 7 ATA P.S Pir Baba was registered against unknown culprits and later on 13/08/2008 the appellant along with local people took the steps to kill those a terrorist in respect of which the recommendation for his promotion was made to the D.I.G Malakand Region Swat on 02/09/2008 (Copies of F.I.R Ño. 408 and recommendation for promotion are attached).
- D. 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.

- E. That this is the element if 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.
- F. 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 compliant against the appellant rather the recommendation was based only upon the hearsay and concocted source report.
- G. 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

(F)

respondents to make the appellant and some others scape goats so that to help the provincial Government to score in the eyes of public.

- H. That this is surprising that the appellant was on one hand suspended where as on the other hand vide Naqal Mad No. 55 dated 06/12/2013 he was sent along with Nafri to Wah Factory and vide Naqal Mad No. 33 dated 06/12/2013 he reported back. 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. (Copies of Naqal Mad No. 55 & 33 are attached).
- I. 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.
- J. 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.



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: 14/02/2014

Sahibzada Asadullah Advocate Supreme Court Of Pakistan.

9

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No	_/2014	
Zaib Ahmad		(Appellant)
	VERSUS	
Inspector General of Po	-	

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.



ADVOCATE



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No/2014
Zaib Ahmad(Appellant) VERSUS
Inspector General of Police, Khyber Pakhtunkhwa, Peshawar. And others(Respondents)
ADDRESSES OF THE PARTIES PPELLANT:

RESPONDENTS:

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

Zaib Ahmad S/o Noor Muhammad

R/o Village Shalbandi, District Bunir.

Appellant

Through

Dated: 14/02/2014

Sahibzada Asadullah Advocate Supreme Court

Of Pakistan.

SHOW CAUSE NOTIC

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

ber nomice tel	POR.		i i i i i i i i i i i i i i i i i i i
<u>S.No.</u>	Name & I	ank	Place of Posting
1	SI Balizar	Khan (Invest.)	I/C Invest: PS Totalai.
2.	ASI Muha	amad Wahab	PS Daggar.
3.	ASI Anwa	Saced	PS Gagra
4.	ASI Muha	imad Zahid	Police Lines
5.	ASI Zeb A	imad	PS Totalai
6.	HC Khan S	her	MHC PS Jowar
7.	HC Sher N	uhammad	I/C Guard Koga Camp
<u> </u>	HC Sher A	fzal	PPP Durmai.
9.	HC Bahray	ar Said	MM PS Daggar.
10.	HC Sher W	ali 'i	VC PPP Kalil Kandaw
11.	HC Aman	Chan	PP Budal.
	9	The state of the s	

You have therefore, committed misconduct which is punishable under rules s 1975.

4 of Police Rules 1975.

Now therefore as required by the KPK Police 1975 I ASIF IOBAL 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,

جاب عالى إ عوالم الم منه مشمو له شو از لو ليس غير 15.95 دور قد من 23 معرد من يون كد سائيل سال 1991، س عنیت گسیل سری بو کر لو بر اور انس سیا کورسز باس کرکے نفیدہ Asi ترقیاب ہو چکاسے سأسُل عن این عرصه خلاز ست سی مختلف تقایمها ست حِوْكِمَاتَ اور دَفَاتَوْ لِو ليسى مِي فَرا نَفْسُ الحِامُ دِيسَ للما ادد اب دوران می کردین سی ملوت بنس د المن سك مذاز سافالمتازى أور بادرى مفتر رياسي. اب سائل تهان طو طالي س عربيه وزيب ١٨٤ ماه سے محلیت نعلا اہریشنل ساف سی فرانف ان د مے د ماتیا۔ اس دوران عمی سائل ہے ابن فرانفیں د استاری ساور بهادری سی این ایک اید دور سائل كى مى كىردى سى ملوت ھى يا ، دور نہ بى ساسے ل ك خلاف محرى أنه لى شكارت بيو في بيعة . جهاف تك سؤرس دلود المعلق به ه من تعار شاور بهوی برسی المساكوي عقتها نسل ها المساكوي عقتها نساكم عادم المساكري المساكرين كادوائك فالملكز لے كا أحكمات مهادر فرطاناً جادس سائیل محلون مشکور رستگاند العارين interaction remainded bially يوليس دائن د كر مود مه قام 23

(13)

HARGE SHEET

charge you if e following Upper / Lawer-Subordina is white posted in Police Lines Dangair as ici. 5.

it has been reported against you that you while posted Police Lines Daggar ethnimited the lote wing act/ acts.

avolve curder corruption during the posting of various places.

S.No.	Pame & Rank	Previous Posting	C used to Police Lines on 12/10/013 On the cause of corruption
1.	S. Balinar Khao	I/C Invest: Fotalai	-do-
2.	ASI Muhammad Wahab		-do-
3	ASI Anwar Saedd 🐣	PS Gagra	-do-
۱.	ASI Muhammad Zahid	Police Lines	-do-
5.	A31 Zen Ahmad	PS Totalai	-do-
6.	HC Khan Sher_	MHC PS Jowar	-do-
7.	HC Sher Muhammad	VC Gurad Koga	-do-
8.	FO Sher Afzal	PPP Durmai	-do-
۲.,	E - Jahrawa: Said	MM PS Dagger	do-
10.	4: 1 Sher Wall	J/C PPP Katil	-dō-, —
. 1	E. Aman Khan	PP Budal	-do

Visibility is a gress misconduct on your part at defined in Rules 2 (iii) of Police Lisciplinary Rules, 1975.

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

3. You are therefore, required to submit your writt in reply within 7 days of the receipt of this charge she et to the enquiry Officer.

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

In male, as to whether you desire to be heard in person or not?

Strument of allegation is enclosed.

DISTRICT POLICE OFFICE IN SUNER

ATT/STED

1900 DATA LODD TA - NECKCharge Shorts CHARGE SHOUT NEW Law

572.84 in 216 218 wing of cops میں کخت کی می سو مر کور کور ار انٹرسر کوران کور سائم ، الله عصم ملازمت سي محلف في نرط ف يوك ت دما بتركوليل. لوليتان سي ف المين اليما دراي أوماول نت بها دیا سے سرانا م دف سے افریسی دران کممی مرسین میں ملوث ش رکھے . محصر سے مناح فیزا میں مالات كمثيره موس برسائيل ن دست كري كا فعامل ك يه الروي مشارك بهار فوى المشكر الساكوديية الحروف كا مفاد كراسي في وسيت الروار عارف في جواف را سرووور س . سائيل عانه فولائي س يو صدريد بالحرمان س اورسانیل کی بھی محری میں ملوث نیں رہا اور فرنسی سانیل تے مان کوئی ساتھ ہوتی ہے ۔ حمال تا اور ساتھ ا كم الله الله المرابي ا الرسس والمحساف والمع والمع تو المرسس عاف تو المسكولوف من المرسس عام المرسس عام والم برسره وفر مری سے اس سوالی . الشرعا عبد حراج سيت كو ما ورسرسي كاروائي غالسل مع المعات عادر زماس مارت سامل نامات دعا گران - (La fair).

DISCIPLINARY ACTION



ASIF IOBAL MOHMAND PISSON Ponce Officer, Buner as a populational posterior and posterior anative and posterior and posterior and posterior and posterior and

STATEMENT OF ALLEGATION

That it has been reported against jost that you while posted Police Lines completed as per source report, you are the following Upper / Lower Subordinates that avolved under corruption during the posting at various places.

<u>S.No.</u>	Narae & Rank	Previous Posting	t losed to Police Lines on 12, 2,7,72
ł	St Bali far Khan	I/C Invest: Totalar	On the cause of corruption -do-
2.	ASI Muhammad Wahab		-do-
3.	\SI Arwar Saced	PS Gagra	-do-
4.	SI Muhammad Zahid	Police Lines	-do-
5.	ASI Zeo Ahmad	PS Totalai	-do-
3 .	-IC Ka in Sher	MHC PS Jowar	-do-
7.	. tC Shor Ma iammad	I/C Gurad Koga	-do-
3	¹ C Sher Afzal	PPP Durmar	-do-
9	iC Behrawar Suid	MM PS Dagg	-do-
10.	Sacr Will	I/C PPP Kahi	-do-
1 2 · .	CAir ii, Khai	PP Budai	-do-

reflect of are grass will conduct on your part as do med in Rome (iii) of Police Rules 1975.

but the purpose of scrutinizing the conquer of hald officer with reference to the second tributer and the property than the property than

and the Mir. Chalter Muhammad Khan DSP HQr. is appointed as enquiry officer. —

The Enquiry officer shall conduct processings in accordance with provision of Police 1998 in 1812, provide reasonable opportunity of defense and nearing to the accessed officer renormation, and in the within twenty five (25) days of the interpt of this order, a continuously is a dishability of the appropriate action against the accessed of their

The accessed officer shall join the preciseding on the date, time and place fixed t

Enquiry office...

DISTRICT POLICE OFFICER.

BUNLR

Egyl C for for with time proposed on project 2013

From C fact for with thing proceeding against the waves officer namely under Police Rules (85)

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DISTRICT POLICE OFFICER,

BUNER

FOLUBRY, FOLD DELTA-THE CHARGE SHEET NEW 2 is

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بن بعى !

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> SH-c 28/11/13.

> > AWEYSTED

بن يمالئ The interest of interesting 1 17. All of Ari S. Un Como Cist 111年1日 111日 111日 مذار من المحمد و معنى من المعنى و عنى مران من المعنى و عنى مران المعنى و عنى مران المعنى و عنى مران المعنى و عنى المعنى و المعنى و عنى و عنى المعنى و عنى و عنى المعنى و الم the first of the state of المراس ال المدات من موه د علم نفری کر می ام یا د ی The Man - Single is the company of the میں سیس کی مذکورہ کی اور کی دراہ کی اور کی دراہ کی اور کی اور کی اور کی اور کی دراہ کی سرعموان می مخاری و روی ا

مِنْ عِنْ اللهِ أَ مَرَهُ الحَرَاعُ مِنْ بِ عِرَوْمِعِ فَوَاللَّهِ . . گوالم أَ مَرَهُ الحَرَاعُ مِنْ بِ عِرَوْمِعِ فَوَاللَّهِ . معرومن عرمت ميول کر زيد زمير دهر مرب ما تعر کيده عالات الولم المرأ والم من تعنيات ته. مزیوره زوه نویست گردون کست نو د شر من بلم کن . طابق کا مسی مسم کی د معملی معے تنبی کیررہ، ا معربی و جوری میم طریق سے دوائی۔ سکہ لولر می لائن کے گاروات میں فوجود نمام لنری کو حوصله دما کرانی . مزنوره ای مین مین در مره نزرا مرزم در المبره امد رین در بوی میم طریع سے ادا مرابا ہے. ریفے تعلیم فی میں مسی کی فشفام کری میں رنگی دوری عمد میں صفحی میوں ۔ مؤلوره کنجاریت کسی تنسی کی میرمنی کی تشکی میت موصول کنیم) میوی میے

29/11/8/3

ATTECTED

دن ميليز 1.15% - 2 ml - 10 EN 1951/15 صرت حرن کر ہم زہدا ہے ۔ اور از اور ا characo Massage فذكره أبد انتهال دلنيره ذهره مراوراسار الأرورة and the second of the party ميات شروش كتخسيان كيمرا المجارية المراجع الما المراجع جرف المرسالة لنسال كرووان كروية من المرسالة النسال كرووان كروية المراسات المرسالة النسال كروية المراسات المرسالة المرسال محولی کولی کے موحمل کین مرتب کا رہ کا ا Egi de Car Millian Military of a state of the stat و مناس البيمار مذر اور كما ولا برنس أسريا الما والمراج من والمراج من المراج الم من المرابك الم 1) 35 / 2e ...

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محوالم أمره المراع مناب محاصب هيد كوارتر معوض فرمت میون - که روی د می اهر آگر دشل شاف می میر رامانه روى مُرْال مين لغين ت ربايعي منزگره دول رنش کی دلسر، ذمه دار لولاری امنیر میے. مرضم مادات ک جوال مردی مُر^{سا} تومن بررُر الا میعے ، منشیات مروش منجدا من میں میں مرك من ده در الع مرد هدر صدر بن مع مرس تو لعینای نبروران رسی با برسوای ی نوی شامی موصول لنبر) میونی مید. عزفوره که متلق مر منوانی فا مسوع بن منبی رکن بمنب سب- آدونشو عروم کنوان می بعی کو ۴ مغ بسروک تما قابل اعتمار و نذو المركميدا دُوا لولر ر أسر سے. من صفح لصنياى مرافعی مذافعی و نوی و کرستامیوں سرامی دروی سے

AVIESTED

28-11-13

لثراق سرشيك

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(J.)- , 3D

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فالرز الكاربورك موالم طاح تما برى 82-572-82 وقدم الله عالم وفد طالب ما موصوب نا الله الله الحاج الالمي كن طولالي حال بويس لأى والح على المحال الماليان الله المحال الماليان الذي الله الماليان الذي الله الماليان الذي الله الماليان الذي الله الم ASi 3 الورسويد لولس سين ذكر طال لولس لائي ASi 4 شراهد بولیس سین بولیس لائی ڈگر ASI 5 مس احد يولس سلوش طوطالحد على لولس والى دُحرَّ ع HL فان سر فحسر هام ورا حال لوليس لائي وركا ع ما مرافعل ولي ويس درماني طال ولي لاي وق ما مهروی انجاج تولیس نوست کلیل حال تولیس لائی ال ملا آمان خان بولسن مثر المال لولس ولائن و گر عنوان الكولري سرطان گريا ولاس اوسوان 15 Com 20 11 80 672-02 / Chin 2 10 cm 20 15. 40472-77 / See 1 2000 - 100 - 100 - 100 88 13 000 562-72 / 100 - 1 مراح المراج الم هيك درج بالاعس داران لونس سلسل غرارًا الربر قداف معامات من تعماع ك دران معنوای ك الزلوات موس ولورش ك روست سى عائد مو كرجس يرالزام على عبده داران دوس عام على تسطى دفترط - مولامه نونىرىك جارى مورسى مام كلاكوالزام على يحمره زارن بولس كخلاف في طلیکار انکولیزی علی سی لاے کا حکم صارف روالا گیاہے جگہ رنکولیزی س ما- مادي دادير شروترن الواسطوري المحري المحريث الم طلىقىلى AN JOIEU (حارى)

الزام على عند المران لولس مله سه وسى النزم ك سلمس قيل العامة تعيناتون سي محكم احديث الامامان لولب لان ولون کلوزیوک آئے ہی جنگ ای ماری طلب کے انکے بانات علمندے کے الزام کھیم علانان نولس سسلمفرا تا رسى أسرك في انزلوات بدولي قب كرسفيسى المنكاري بين حن مين سے برائك اسے دیکی غرض شاماء ریان دار مركب في ماك ولك كالوفاد لورعوم كاظهم الين سانات مين طام كرما به حن من سے بعض ان ایسے صافی سے راہ بدی سر اوس میں میں مادی مامان سے لقريق سرشفيك رئى (غائركا (ورقرض شاسى كافعنى يدي كا مرامانات علیدہ علیدہ کے ایک النرام على معان على اعمال على اعمال على المرى ما وطالح وطالح وفي سالم سزال بون اکار کردگی اور تصافی که صفاتی کوالف حسب زمل تابل والفظ (1) المنسخان is حال مستمد لوليس لافي - ارمخ عبرتي 75 ورمكروني كوري عرب المرسكول كورس موروي و مع الشرصيات سكول كورس مورا 88 إه و تحیناتیاں خلے سوئے: ۔ لولس لائی۔ سروٹری سے کو جے آباد کولس لای مرند سوات عالمی ای اے (CIA) سوات ، تھام ڈگر تو بنر بو کی فتح مور ، مولس لاک سند شوات ، جو کی فتیگی خلع بوشر ، بوکی رحم آماد سوات: سی آتی اے (CIA) بو شر ، تعام نارہ کی نوشر ، فوق رقم آباد الم المورك المراكوليم، كلما يرى نوف المراكي يوف المورك يوف المورك الموسان المورك الموسان المو سوات ، تعانم وشر، تعانم حنال لا من ما ما طوالی لوشر ، تعانم طرائلی مُلْع لَوْسُ كَامْ طُوط لِي لُوسِ لُوسِ لَائْ وُكَر لَجِد سِرْتَال عَلْ تَافِي 120 - 10 06 02 conflict Si 26 16 رون مراح المحالي المركة رافي الماريع الوازا كياب اورسزالياس المرسزالياس ى تعداد بارو عين حن مين كونى منكن سواط بي من مع عبد مندم هر الماني من مين مع عبد من مع ماني علام عدد على المواقع المع المواقع المع المواقع المع المواقع الموا اعد في موال على مستم الولس لاي رام حرى موم الحوال الليم Columbia تعساتان د لولسان لای عرف سواری ، نهام ناوی دولس لای معلل وی کلیانتری ولس لای وگر وی بگره و در کورس

عارج کارعاری کوش (۱۵) دسترکش سکونی (۱۱) مدو ترحان داگر الحارط المرسالية الحلي الحلي وي الله المحلي (14) وعطل لائن (15) حام ذكر آ الم المونس لاى دُكَر فحر مونواب أكل كا عرص ولا نوب ما المريد الله كا عرص ولا نوب ما المريد الله الله الم س الحسى کارکردگی ، تربعی اسفاد مجے ہے جب میکر انتظاری کی تحدار ہی ہیں۔ جدمعري توعت كىستراطيات ي (3) ASI الخرسد و متونه الوس اللي تاريخ حسرتي حدام الوال المرائ كورك الماركول كريك الماركول المارك تعناتیان: - 1 موسون این دگر (۵) سکرمت کوری (3) تمانه طرفای (4) وی ويُعْلِي رَى لولس لالى دُكر رَى حَلَى كَاكُرُهُ (٢) خَلَامُ كُولُ ولائِي بَرُكُو (٩) لولس لائن و حر (١٥) غريف شاف (١١) ايجاج وردى تحودم لولس لال ال ملازمت ك معون الحقي كا در وي المدر تعدي اشا د به تعداد هاسم واز كله جكر بنارنسطوال كل بهاي وهدى والمال كال م 31 31 الوثر كول كوي م 20 رستوشي كول كورى ما 30 ما 1998 كعناسان و كولس لائ دُرُ (۵) تحانه سرمایا (3) كادر كروا كور دعا اعد المعدى عرص ما نعت وه و المعدي كادكردى العراق المعرفي كادكردى العراقي كادكردى كادكردى العراقي كادكردى كادك الناد الي حبك برانتران كل في الرحي لانستان ا العناتيات (1) كولس لائت AR (2) عمل وى (3) مهر نولس لائل

(3) Con (6) Chimes Charles DFC (5) Who had a 30 (10) 5 50m C SCIU (9) Eostirles (8) GU (9) (7) Q6 نگرگی (۱۱) کی توریک (۱۹) تکانه طرطای (۱۵) کاک در دای وام (۱۹) معر Jolf to to 1 (17) Let Se Lie (16) Week Signing 15(22) しにらる (21) 06ま とり(20) OASI (19)CRO(18) وَمَا رَحِي وَمَامَ عَلَى (35) وَمَامَ عَلَى (35) وَمَامَ وَمُولِي (35) وَلَا لِلْ اللَّهِ اللَّهُ اللَّ ASi رسی الحبی کاردی وارس ون ماه سال ما الحبی کاردگی اور لحدی النا كل لفظام جكم معولى لفيس كر تين سروليان م (ع) خان شهر عجم متصدول ان ڈگ تاریج هرتی ₁₉₉₆ و میکروش کوری 205 Jen 20 300 1997 لمناتات و ولوليس لائن ﴿ فَنَكُرِيرِنْكُ كُورِي رَبْ الرُّنُول كُورِي (4) وي سوافي (5) خارة و گر (6) لولس ل ل شكارًا (٢) ح كي كا گره (8) لولم كول كويس @ بطريفك (10) كادر مره نقام (11) مرام عا محره (الاسلالية (5) 1- MAK (16) 3 3 AMAK (15) 65 (5 (14) 200 (13) 13. MHC 20 JES MHC (19) ST VB) 53 (18) 12 165 (17) (۵۱) لونس لائی 🖟 8556 210 03 17 04 24 Teller Pres 29 29 2016 2 6 Cold de 12 Chin Lo 5 ا ، المعرف التي المرق الموري التي المرق الموري الم مریدی چوور کان اور کیش کانارکویک سر بالازان کانارکورک لتربغی استاری در در 33 ی اورمعی دیس کی سزایاری کی مناهای تعدد گیاری جا کم لحبتال بر تعمل حج آ کری

الم ترقر في المرور والزيت عن عاه سال بين حكم لصناعال لولس لاسي H وی سوای عمرسل بنیک ، نولسی لاک ، وی بوش ، حرام گادر ، مناسطی کا طرفانی می کادرسیس ج میں نولس لائے گادر مسیاری میلی لائے جھے سواری کارون کا موی سواری کادر ما رسان کادر ای میا ، نولس لای ، گاد خانالاز دهری کا در دیر مای ع صل لوسی دو گره عظر در در در دی و کار و کی سوائی عصب نوسط جوه می کارد خانا نو دهری عظار سوللک كأدركوكا أورلولس لاى موسى ووروز كولنر مراك المراب المع الموالي المرابي الموالي المرابي الموالي المرابي الموالي المرابي الموالي المرابي الموالي المرابي المر 169 15 6 36,50 6 -6 25 Ly 6 - 31 CP - 315 6 mg 40 هَارُولَالِي كَنْرُ عِلَى عَلَى عَلَى عَلَى اللهِ عَلَى اللهِ عَلَى اللهِ عَلَى اللهِ عَلَى اللهِ عَلَى اللهِ خانانود حركاء ترقاني تاعوع مردا تعانير بلاء تعان حاد د خاری خانانو دُهری، گارد درمای، کارتک کسی کارد درمای ، ولس خرب کارکردگیاں سوائی ق کر روز بید میرون این دگر تاریخ هری 370 مینه اولیس لائن دگر تاریخ هری 370 ک 5 377 Me 20 20 (See See 2003 1997 (See 2) تعباتوں کی تعمل حسین ہے۔ مولس لائی ڈگرے کورس ونگر فرائل ، کو شرکورس ، فولس لائل ، کارو نون علی وی سوائی ، وی تکری ، گرز مام د نسر ، کارد کنگر کار دی در رسین می کارد دوله بابا کنر تام بوشب خوانم دی می ۱۲۶شان الما الما المحاليم معرف من الما المحالية المحالي

المرجى وسكار المراح المراع والما مرد الما كالحوى مدي الما والما المراح ا Body (33; 151 & all 55 coli ; 50 55 15 AMHO جارته دی اندی میں سے 1 = 198/ 173 ensiet (10) المرمارك العالم والمرط والما والمراع المراع كتيل سروني تر يج ورفارت كرك شروي كي السن في استهاري محدار میں بھوڑ اے میں کاماتی ہی ہوتی اس کارکردگی تی بنا دیر سہوتی اللہ کارکا فیر معلی کارکا کی کارکا کی معلی کارکا کی معلی کارکا کی معلی کارکا کی کارکا کی معلی کارکا کی کارکا کی معلی کارکا کی کارکا کارکا کی کارکا کی کارکا کی کارکا کی کارکا کی کارکا کارکا کی کارکا کی کارکا کی کارکا کارکا کی کارکا کارکا کی کارکا کارکا کی کارکا کارکا کارکا کارکا کی کارکا مال الحقی کار کردنی کار نفرلی ج (4) جیکہ سزایا ہوں کی تعداد (18) ہے عمر علازوت یون داہ سال ہے علازوت یون داہ سال ہے لَحْسَانان الْمُدُونِي كُلَّي وَعَلَمْ ذُكِّر مُكُورُانَكُونَ مَاكُلُو الْمُعْنِي وَلَي بَلْمُوهُ لوكسيس لائى ، كاردا منور و وكواك ، كاردون كلى لولس لائن كارد عازى كوش، لوكس لائى كارد تدك المرشار ، خانه و كرى خيكا يَمَّا لوكس لاي م كاردكيًا في و تعام طولالد، م موقوام شكامًّا لوكس تعان سرمایا، نوکس لائن معطل سطاندان کی ، نولس لائن ، الکارد کلیل کنڈاو کارد کلیل کنڈاو کارد کلیل کنڈاو تولس لالى ATTYSTED 127 3000 20 20 20 20 20 20 20 20 20 12 2000 200 12 20000

ى براخ، زرل كورى صيك، نولس ذاى ، كومركول كورى، يولس ذاى المان على الله المعالم الولس وأن المراد المر بردفر وی نال: مردفر ها سرمال مانت روی نولس نانی ، سُعْلِيمُ ، ولتَ وَفَى ، وَفَى الرالولس لائى السلام على مازمان لولس (ما كسان اعلى / ادني) ميلولنون تمالزلا رين. بورث موصول ميون بر موخر 13 ه كوحس الحكم اف زن بالاماسيات ين لاق دُكُر كلور سي على المراب فسر ليكس المهكارات كعلاده عوام الناس الان نک پہنی ہے کہ الزام علیم حلائی نی لولیس کے ویلاد کرسٹن کے مرام می و تعدیری سردم سے کیکن احال کری بیرائوٹ شیمی کے ایک حلان مان علندس كايا الزام علم حلاجان بديس اعمال الع ادر فوى عل مطالعہ ہو کر بلیدر حات <u>ای کے خوا</u>ف مقدم علی صفح بھی و جو اور اور 1611Pe/5 روز کا کا اور مقدم علی مقدم علی مقدم ا تعالمانتی کرف سدرشران سوت سب مبلع ایک سی رسوت سان تحاکزام Nump ACE 2 Jim / 8. 0 miles o 10 0 miles of 10 miles o لینادرسری کیا گیا ہے تنا اور م علی میں اعمال ناموں اور فوجی متلوث س کرنے کی اور میں ملی سے ملاف ایک تعنیا توں کے معنی کرنے کے اور اور میں کرنے کی انسان کی میں کرنے کا انسان کی می الزامات في رابع الله موصول مجمع في مدي وجم الزام على ولازان لولس کی ربع یک آندی ہے کور فیلٹر فلار میں پولیس کیلے معزموں بین ہیں انگو کری بور Copy a ce

ALL JOILED

ORDER

30)

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.

DISTRICT POLICE OFFICER, BUNER

Dated $6 \cdot 12 \cdot /2013$.

No 2392 - 94 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

ATTESTED

جناب عالى!

گزارش ھیکہ سائیل مور خہ 01.04.1991 کو محکمہ پولیس میں بحیثیت کنسٹیبل بھرتی ہو کر بعد فراغت ریکروٹ کورس ضلع پونیر کے مختلف تھانہ جات اور چو کیات میں ڈیوٹی سر انجام دیتارہا۔ بدوران تعیناتی اپناڈیوٹی نہایت دیانت داری اور ایمانداری کے ساتھ سر انجام دیتے ہوئے (1) A اور (1) B کے امتحانات پاس کرنے کے بعد اعمال نامہ برے افعال سے پاک ہوئے کہ بناء پر افسر ان بالانے مجھے لوئیر کورس کے لئے منتخب کیا۔

سال 1997 میں لوئیر کورس سے فراغت پر ضلع ہونیر میں افسر ان بالا کے حکم کے مطابق ڈیوٹی سرانبان ویتار ہا۔
سال 2004 میں بعہدہ ہیڈ کانشیبل ترقیاب ہوا بحیثیت ہیڈ کانشیبل اپنے فرائض کی بجا آوری میں کسی قسم کی کو تاہی بغیر
کام کر تار ہا۔ سال 2010 میں انٹر میڈیٹ کورس پاس کر کے سال 2011 میں ASI عہدے پر ترقیاب ہوا۔ ایپنے ہالا ترافسر ان کو کسی
قسم کی شکایت کا موقع نہیں دیا۔ اور نہ ہی ووران ملاز مت عوام کی ول آزاری کی۔ اسلے تاحال سائیل کا اعمال نامہ ہر قسم برے انٹری
سے بلکل پاک ہے۔ جبکہ اچھے کار کر دگ کے بناء پر وقاف فرقافسر ان بالانے انعامات کے علاوہ تعریفی اسنادے نوازا گیا۔

اور گزشتہ چند سالوں میں دہشت گرووں کی بونیر آمد کے دوران اپنے جائے تعیناتی پر موجود رہ کر شدت پہندوں کے خلاف ہونے والے کاروائیوں میں بھر پور حصہ لیا۔ ان جملہ کار کر دگی کے ساتھ مور خہ 21.10.2013 کو سائیل پولیس لائن تبدیل کیا گیا۔ مور خہ 23.10.2013 کو جناب ڈی۔ پی ۔ او صاحب کی طرف سے شوکاز توٹس موصول ہو کر جس پر اپنا تفصیلی جو اب تحریر کرکے افسران بالا کو اپنی ہے گئا ۔ پر گزائی پیش کی۔ لیکن اس کے بعد 28.11.2013 کو مجھ پر چارج شیٹ تقسیم ہو کر اس کا بھی تنصین ہے ۔ دیا۔ لیکن افسران بالا کو اپنی ۔ پیشن کی۔ لیکن اس کے بعد 2013، ایس ۔ پی ہیڈ کو ارٹر انکو ائزی کی گئی۔ بدوران انکو ائزی نہ ہیں۔ خلاف کس افسران بالا میر سے ساتھ متنق نہ ہو کر میر سے خلاف کس خیادت اور ثبوت کے مور خہ 25.12.2013 کو بحوالہ آر ڈر بک نمبر 158 معالی کرکے مور خہ 20.12.2013 کو بحوالہ آرڈر بک نمبر 159 ملازمت سے جری ریئائیر ڈ آبیا۔ جو میر سے اور خاندان کے ساتھ سراسر ظلم ہے۔

کیونکہ بدوران ملازمت کوئی ایبا قدم نہیں اُٹھایا جس کی بناء پر میں جھوٹے سز اکا حفد ار رہالہ لیکن بغیر جُورت کے سکہ پولیس کے ساتھ تقریبا22سال وفادار رہنے کی سزادیگئی۔

لہذابذریعہ درخواست استدعاهیکہ آپ صاحبان مہر بانی فرما کر جناب ڈی۔ پی-او صاحب ضلع بوئیر کا جبر کاریٹائیر سنٹ تھم مور خد 06.12.2013 کالعدم قرار فرما کر سائیل کو ملاز مت پر دوبارہ بحال کرنے کا تھم صادر فرمائیں۔ توسائیل تاحیات دُعا گوہ رہے گا۔ آرڈر کا بی ہمراہ لف ہے۔

> العارض كي مسرك المراك بردارسابقد ASI زيب احمد سكنده شلباند كي ضلع بونير معرض في المراك

ATTITUD

iller

(33)

بروان جات منجاب الاحدسول يوكر جن سين ملزمان كا منزر كل ادر حرم من د نبع الم 140:149 على محد انيزاد كى كير الأفريد : RW D. Km پس از بادر جائب نیر و 540/19 قادم سئور تعداد باخی بزادد چنزز مودند 23 اپر بل2007 لی فود (قادم سئود جایز) منمی قادم (بهگیمی می تی گرد کرد نار نر (۱)۵_۲۳ TTESTED ابتدائي اطلاعي ربورث اندازى يوليس ريورث شده زير دفعه ۱۵ مجوند شادا فوجدارى مزيزالة ند 284 منعتد الما يما 216A-109 Roca and the Sun of مِنتِعَاقَ يَ مِن أَكُر اطلاع دَرْجَ كرنے مِن توقف موا موتو دجه بيان كرو البتراني اطلاع فيحدرج كرو- استمت أتب خدري مرتبا معاسا فللته عَ الْحَامِينَ الْمُوالِي الْمُعَلِّمُ اللهِ مِنْ اللهِ اللهِ اللهُ اله فالت قد وصب بين ريورت كريم سي مع فرشيران ١١٠ - حنير ند وديه خر سايستادين ایم کسواری مادی سرکاری شری میرود به به به یک درانیور سنیسرخان نبر 376 دوتم نظر شیر میردد. عماء بروزان مشته جب جرخيا جس سخيد. تو يبير سه تعاد بين الما والم المستن المالام الما الما الما الما المالية الم على بين متعل والرسيد برا الرده تعلى نرزيع الله المشن سيد الرعاد دند فالبرند بتراع كالما المالية ال نا ني ران اوريا ئين بازم براور تر نتسرون نه عد . خدر نبر حدم حيم عيدان حياي منسف زخ سرت جس ار دانور سیرمان به 376 سخران طریر علی ایرانی مرادي مبر الماري من ملطان ما ما من ملك من كافي لعثمان دسيره مر حسكا على والع الما والم المنعم دين ما حيم ديد جو - بين برخلاف مذيات لعداد اسم مسكن ما معلوم مع خلاف يوليس وف يوسركارى د يوى من دوران بدريه ، سام النفس بر الرده مثل ما سربك في المعلم الناسير ينًا وَمُد ، حاس بيساان ؛ مبتث تردي كن Asi سيد لمدرجات كسك . في آيسان كان ومن و لا تعزيداري آيا سول السين مستنطب مما رواني يوليس عسالات بريانسك هيرت فري درج مير المحمد المرتقيد كسناط مسمايا إلى المرساتيا في المستحل المستحل المستحليا ب سب كمد أن مرا أبول لعول م بسد وسان سي كا ندات سه اور قد وصن و الورث رسلا غر مراكه ١٨٨٤ ١٠٠٠

وشيرمان عادر المناه ال المناسبة أبن ف يوا ع الريال سام ع حدة الحرار ع 3d -د والمدالة

יוני ויין וייל שב לב פאם ויייול ב בתיים

المعالمة المعالم المعالم المعالم المعالم م جم ولا درج المعتركة النسانة الملائع دى سائل مان ١٥٥ . حب الى مان ١٥٥ . حب الى مان ١٥٥ ما مع

المنزف المرابع عديد وروا الروزا موتم ردات نفرند سائة بعيد . تدلي

مع احل بالد به ما تسب حبيب التي جا الد بيا الموالي برست ال الله على المراجع المعلى المورث عيارتين

Chunin (2.

MHC PS PIO BABA

170 in in 11 13

ابندائی اطلاع نسبت جرم قابل دست اندازی پولیس ر پورٹ شده زیر دفعه ۱۵ مجموعه ضابطه فوجداری

ح بونير	غانه بيربابا ضلة
يخ ونت وقومه 8/8/8 بونت 20:20 بج	لت نمبر 408 تار
5/8/08 بوتت03:20 بج چا کیدگی پرچه 88-8-5/03:00 بج	تاریخ ووقت رپورٹ
عزيزالله نمبر 294/LNC متعينه تقانه پير بابا	نام وسكونرن اطلاع د هنده مستغيث
PPC 302, 353, 324, 427, 7ATA/148,149 PPC/	مخضر کیفید نے جرم (معدد فعہ) حال اگر پچھ لیا گیا ہو
216-A, 109 PPC	
رودُ شاہی جونسیلہ چوک بفاصلہ 1/2-1 کلومیٹر جانب جنوب از تھانہ	جائے وقوید فاصلہ تھانہ سے اور سمت
ملزمان 15	نام وسكونت ملزم
برسیدگی مرسله پر چه دیا گیا	کاروائی جوتفیش مے تعلق کی گئی اگراطلاع درج کرنے میں تو قف ہو ہوتو وجہ بیان کرو
لطور پیش ر پورٹ	تھانہ سے روانگی کی تاریخ ووقت

ابتدائی اطلاع ینچے درج کرو

اسوقت ایک تحریری مراسله منجانب احمد الله خان اک این کیولی مینبتال و گر بدست کشفیلی محمد یونس نبر 179 موصول ہوکر حزف و بل ہے، افیسر انچارج صاحب تھانہ پیر بابا حسب اطلاع سول پستال و گرآیا کیولی میں مستغیث نے بحالت مجر وحیت یوں رپورٹ کیا کہ میں معدنوشیران الاک اضمیر نبر کاری نمبر پشاور 1930- A جوایک و رائیور فیر کم موبائل گشت تھا بدوران گشت جو جو خیلہ چوک پنچے تو پہلے سے تاک میں بیٹے شیر خان نمبر 676 دوم موبائل گشت تھا بدوران گشت جو جو خیلہ چوک پنچے تو پہلے سے تاک میں بیٹے شیر خان نمبر 670 دوم موبائل گشت تھا بدوران گشت جو جو خیلہ پوک پنچے تو پہلے سے تاک میں بیٹے کہ سان اہم و میکن نامعلوم نے پر متصل جوار سے بدارادہ قبل بذریعہ اسلی آتشین سے اندھا دھند فائرنگ میروع کی، جیکے فائرنگ سے سیدمحمد خان AS گاڑی کے فرنٹ سیٹ میں لگ کرموقع پر جال بحق ہوا جبکہ میں با دو پر اور نوشیر وان نمبر 676 مجزانہ طور پر فی گراہے گاڑی سرکاری نمبر چکھوں پر لگ کرزخی ہو کہ ہوا کہ میں بازو پر اور نوشیر خان نمبر 576 مجزانہ طور پر فی گراہے گاڑی سرکاری نمبر پشاور/ AS ان کورین کاچش میر برکاری نمبر کاروئی کے دوران بذریعہ اسلیم آتشین بدارادہ قبل فائرنگ کرنے ، عوام الناس میں خوف و حراس پھیلانے دیوئی کے دوران بذریعہ اسلیم آتشین بدارادہ قبل فائرنگ کرنے ، عوام الناس میں خوف و حراس پھیلانے دہشت گردی کرنے کی دعویداری کرتا ہوں ، العبدد شخط کاروائی پولیس حسب گفتہ سائل حرف ، محرف درج صدر ہوکر پڑھ کر سنایا سمجھایا گیا ، درشگی کا د شخط شربت کیا

Pile

جسکی میں تقد ایق کرتا ہوں ، مقول ASI سید محمد خان کے کاغذات مرگ اور مجروحین رپورٹ کنٹیباان عزیز اللہ RHC نوشیر وان ، HH نمبر 435/FC کے نقشہ ہائے ضرر بمطابق زخمات مرتب کر کے ہمیتال ڈگر حوالہ ڈاکٹر صاحب محمد عالم ہوئے ، مضمون رپورٹ سے صورت جرم بالا کا ارتکاب پایا جا کر مراسلہ بغرض قائی مقدمہ بطور پیشل رپورٹ بدست کنٹیبل محمہ یونس نمبر 179 ارسال تھانہ ہمراسلہ گرارش ہے SD احمد اللہ شان ا ASI نہوری کو لئی DHQ ہیتال ڈگر مور خد 80-8-3 کاروائی تفانہ پس آمدہ مراسلہ پرمقدمہ بجرم بالا درج رجٹر کر کے افران بالاکواطلاع دی جاتی ہے ، نور جمال خان SHO حبیب الحق خان SHO حبیب کرن الحق خان SHO حبیب الحق خان SHO حبیب الحق خان SHO حبیب کرن الحق خان SHO

MHC PS Pir Ba Ba 5.8.08





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

ORDER:

This order will dispose off the appeal preferred by Ex-ASI Zeb Ahmad of Buner District for reinstatement in service.

Brief facts are that the above named Ex-ASI 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, of Saidu Sharif Swa

Malakand, at Saidu Sharif Swat
Nagi

No. 1149-50 /E,

Dated 6/ > /2013/

Copy for information and necessary action to the:-

- 1. District Police Officer, Buner with reference to his office Memo: No. 24/EC, dated 01/01/2014.
- 2. Ex-ASI Zeb Ahmad of Buner District.

ATTESTED

Deputy Inspector General of Police, · / Mgiakand Region Swat.

No. (60)

/ 强B, daved Daggar the

5/) /2008.

Subject:

RECOMMUNE ATION FOR PROMOTION

deme.-

On 08/50/2008, un cloutified armed miscreants attalled Police Check Post Kinger Gali, wherein 8 Police personnel's were martyred The miscreants escaped alongwith official weapons and uniform etc of the Paice A case vide FIR No. 409 dated 8/8/2008 - 1/s 302/324/353/-104/148/149 PPC read with 7 ATA of PS Pir Baba as registered against the unknown armed miscreants.

On 13/8/2008, the local inhabitants of village Shallbuidi encircle the terrorist in the mountain. During this mass initiative the following Police personnel took part actively in plain clothes, alongwith the Polal and encircle the miscreants / eterrorists. They worked ⇒habitants volessionally and well quanized. Due to their this sincere efforts, very empowered the miscreants / terrorists and eradicated them once for all. This act is highly commendable and was praised by every one from the general sublic. The act of these official infused a new life and hop in the h. lly demoralized Police personnel and inhabitants of the entire District after the irmed attack on Check Post Kingar (Sair)

- HC Zeb Ahmad No. 245 1..
- 2. HC Muhammad Jivid. No. 257
- HC Javid Khan No 20-1 3.

. In view of the above the officials are recommended as uncer-HC Zeb Ahmad W. 245 is strongly recommended for promotion as ASI out of turn as special case in according with Standing Order 8/2008.

The other two Head Constables, who are near to overage, ٠2. recommended for intermediate course as special case.

Their service structure is enclosed.

DISTRICT POLICE OFFIC: ; BUMER.

66 12 36 N 55 N JE - 35 My 06/3 Per 8 06/10 Tue Asi sely dis 28 olupar, probate del por for 1876 0 10 10 0777 0 00/19 0197 is BUINS 10 5 6 Charles sol 34 00 Og ille the cold

16/2/201 33 HAPE 673 7 10 10 1000 Cas AS My 33 N 1, U, 1 50 plf of 10 0 6/2 per 00 Ji wil o'le 29/1/2 - 21/2/1/20 e'le hui who Ois and By By John by off the Curly come due of the soil Curs Civil, por a del 3 8 1/13 1) Sun file of the first for fire 6/12/13

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 237/2014

Zaib	Ahmad s/o Noor Mohammad Ex-ASI r/o village Shalbandai District Buner
	Appellar
	VERSUS
1.	The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
<i>2</i> .	The Regional Police Officer, (DIG) Malakand Region Swat.
<i>3.</i> ·	The District Police Officer, Buner

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Bistrict Rolice Officer Buner (Respondent No. 3)

... Respondents

Before The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 237/2014

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 is correct to the extent of passing Intermediate Course and subsequent promotion to the rank of ASI. The rest in incorrect. The appellant have been involved in corruption, misuse of power and committed gross dishonesty during his service.
- 3. Para No. 3 of the appeal is correct. The appellant was reported to have been involved in corruption, misuse of powers and other corrupt practices.

- 4. In reply to Para No. 4 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.
- 5. Para No. 5 of the appeal is correct.
- 6. Para No. 6 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.
- 7. In reply to Para No. 7 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.
- 8. Para No. 8 of the appeal is correct. The Respondent No. 2 rightly upheld the order of Respondent No. 3.
- 9. 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. Correct to the extent that the brother of the appellant was martyred and the appellant was recommended by the then DPO Buner for out of tern promotion, but later on it was revealed that the appellant has been persistently involved in corruption, misuse of powers and other corrupt practices.
- D. Incorrect. The appellant has persistently been reported to have been involved in corruption and committed unwarranted acts.

E. 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.

F. Incorrect. There were secret / source reports against the appellant which could not be

disclosed in the public good and interest.

G. 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.

H. 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.

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.

J. Incorrect. The appellant has rightly been compulsorily retired from service in

accordance with Police Rules - 1975.

<u>Prayer:-</u>

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. 237/2014

Ex-ASI r/o village Shalbandai District Buner	r Mohammad	iib Ahmad s/o Noor	Zaib
	į.		

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

AFFIDAVIT

We the above respondents do hereby declare and solemnly affirm on oath that the contents of the reply to appeal No. 237/2014 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. 237/2014

Zaib Ahmad s/o Noor Mohammad Ex-ASI r/o village Shalbandai District Buner
Appellar

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)

> Oistrict Police Officer, Buner,

(Respondent No. 3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 237/2014

Zaib Ahmad S/o Noor Muhammad, Ex-ASI, R/o Village Shalbandai District Buner.....(Appellant)

....(Respondents

VERSUS

The Inspector General of Police K.P.K and others.....

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

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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.

ADXOCATE



BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE

TRIBUNAL, PESHAWAR

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C.M No. ____/2014

In

S.A. No. 237 /2014

Zaib Ahmad.....(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.

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.237/2014		•
•		
Zaib Ahmad		(Petitioner)
	VS	
I.G.P and others	• • • • • • • • • • • • • • • • • • • •	(Respondents)

AFFIDAVIT

I, Sahibzada Asadullah, Advocate, Peshawar do hereby as per information convoyed 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.

AD VOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Rejoinder

In

Service Appeal No.237 /2014

Zaib Ahmad......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 explaination.
- 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.

Dated: 15/09/2014

J. Para No. J is incorrect the order is based on malafide and ulterior motive

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.

Appellant

Through

Sahibzada Asadullah Advocate, Supreme Court of Pakistan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Rejoinder

In

Service Appeal No.237 /2014

Zaib Ahmad......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.

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ADVOCATE

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others......(Respondents)

APPLICATION FOR SUSPENSION OF THE IMPUGNED ORDERS DETED 06-12-2013 AND 06-02-2014 PASSED BY DPO BUNIR AND REGIONAL POLICE OFFICER MALAKAND.

Respectfully Sheweth:

- 1. That the captioned appeals have been filed before this august court where the date is fixed as 16.04.2014.
- 2. That the appellants are poor police officials and have suffered a lot.

- 3. That the appellants have got a good case and are sanguine of its success.
- 4. That the balance of convenience lies in favour of the appellants and irreparable loss has occasioned to them.

It is therefore, prayed that on acceptance of this application the impugned orders may kindly be suspended till final decision of the case.

Appellant

Through

Dated: 27/02/2014

Sahibzada Asadullah Advocate Supreme Court Of Pakistan.

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BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 237/2014

Zaib Ahmad.....(Appellant)

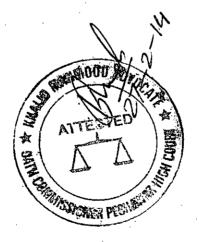
VERSUS

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.



ADVOCATE

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 237/2014

Zaib Ahmad.....(Appellant)

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others.....(Respondents)

APPLICATION FOR SUSPENSION OF THE IMPUGNED ORDERS DETED 36-12-2013 AND 06-02-2014 PASSED BY DPO BUNIR AND REGIONAL POLICE OFFICER MALAKAND.

Respectfully Sheweth:

- 1. That the captioned appeals have been filed before this august court where the date is fixed as 16.04.2014.
- 2. That the appellants are poor police officials and have suffered a lot.

- -3. That the appellants have got a good case and are sanguine of its success.
 - 4. That the balance of convenience lies in favour of the appellants and irreparable loss has occasioned to them.

It is therefore, prayed that on acceptance of this application the impugned orders may kindly be suspended till final decision of the case.

Appellant

Through

Dated: 27/02/2014

Sahibzada Asadullah Advocate Supreme Court Of Pakistan.

(3)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 237/2014

Zaib Ahmad.....(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.

ADVOCATE