

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
AT CAMP COURT ABBOTTABAD.

Appeal No. 852/2018

Date of Institution ... 02.07.2018

Date of Decision ... 17.06.2019

Nadeem Shahzad S/o Mohammad Afzal Khan (Ex-Constable no. 525, District Police Haripur) R/o Village Jamia Utman, Tehsil and District Haripur.

... (Appellant)

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and two others.

... (Respondents)

MR. MOHAMMAD ASLAM TANOLI,
Advocate

--- For appellants.

MR. MUHAMMAD BILAL,
Deputy District Attorney

--- For respondents.

MR. AHMAD HASSAN,
MR. HAMID FAROOQ DURRANI

--- MEMBER(Executive)
--- CHAIRMAN

JUDGMENT

AHMAD HASSAN, MEMBER:-

This judgment shall dispose of the instant service appeal as well as connected service appeal no. 853/2018 titled Babar Mukhtiar as similar question of law and facts are involved therein. It is added that on the basis of enquiry conducted against them, major penalty of dismissal from service was awarded to both the appellants.

2. Arguments of the learned counsel for the parties heard and record perused.

ARGUMENTS

3. Learned counsel for the appellants argued that on the basis of allegations contained in the statements of allegations, disciplinary proceedings were conducted against them and upon winding up major penalty of dismissal from service was awarded to them vide impugned order dated 30.05.2018. For redressal their grievances, departmental appeal was preferred on 08.06.2018, which was dismissed on 21.06.2018, hence, the present service appeal. Allegations leveled against them were frivolous, unfounded and baseless. Enquiry was not conducted in the mode and manner prescribed in the rules. The enquiry officer failed to confront the appellant with solid documentary evidence. Though statements of some officials were recorded but opportunity of cross examination was denied to the appellants. Moreover, copy of enquiry report was not annexed with the show cause notice served on the appellants, thereby denying them opportunity of offering proper defense. This was a serious illegality on the part of respondents and rendered the entire proceedings as ineffective/doubtful in the eyes of law.

4. The accused charged in the FIR confessed his guilt before the Judicial Magistrate, Haripur, whereupon he was awarded penalty and fine. Subsequently, on the orders of the said Magistrate the accused also received Rs. 45010/- and Nokia mobile from the respondents. A false FIR was registered against the appellants so as to damage their unblemished career. Reliance was placed on case law reported as PLJ 2006 SC 777, PLJ 2014 Tr.C. (Services) 105 and 1997 PLC (C.S) 396.

5. On the other hand learned Deputy District Attorney argued that the appellants in plain clothes took one Zameer Khan S/o Karim Dad to the jurisdiction of P.S KTS and

demanded Rs. 60000/- as bribe failing which they threatened him to be implicated in a narcotics case. After bargaining they received Rs. 45000/- and also registered case FIR no. 120 dated 27.02.2018. Previously they had assured the said accused that FIR would not be lodged against him. On an application submitted by Mumraiz Khan real brother of Zameer Khan FIR no. 127 dated 01.03.2018 under Section 382/342/506/34 PPC P.S KTS was registered against both the appellants. Thereafter departmental proceedings under Police Rules 1975 were initiated against them after conducting regular enquiry were found guilty of the charges leveled against them and major penalty was awarded after fulfillment of required formalities.

CONCLUSION

6. To set the record straight, it is pointed out that on 27.02.2018, the appellant on search recovered 480 gram Charas from Zameer Khan S/o Karim Dad, alongwith a sum of Rs. 45010/- and one Nokia mobile model no. 6300. Recovery memo and murasila were prepared and sent to PS KTS for registration of FIR. On 28.02.2018 complete challan was submitted and the accused was also produced before the Judicial Magistrate, where he confessed his guilt and was awarded punishment alongwith fine. After release from jail on 04.03.2018, the accused submitted an application before the judicial Magistrate for return of recovered amount and mobile phone. Vide order dated 07.03.2018 the accused received the said amount alongwith mobile. Application given by Mumraiz Khan S/o Karim Dad (real brother of the accused Zamir Khan) was false/fabricated and also smacked on malafide ^{intention}. The basic aim was to settle score with the appellants regarding arrest of his brother.

7. Perusal of enquiry report revealed that the enquiry officer miserably failed to do justice with the assigned task. He produced a perfunctory/sketchy report in which concerted efforts were not made to collect concrete evidence, therefore, charges leveled against the appellants were not established. Written defense in the shape of reply to the charge sheet/statement of allegations was not at all examined/ taken into consideration by the enquiry officer. It was a rudimentary requirement of the law/rules and duty of the enquiry officer to have minutely gone through their statements. Neither, statement of witnesses were recorded nor opportunity of cross examination was afforded to them. Though show cause notice was served on the appellant but copy of enquiry report was not supplied with the same thus rendered the proceedings without backing of law and also denied opportunity of fair trial/defense to the appellants. It would not be out of place to mention here that while posted in the same Police Station, he had arrested sixty five drug paddlers list which is appended with his reply to the charge sheet/statement of allegations.

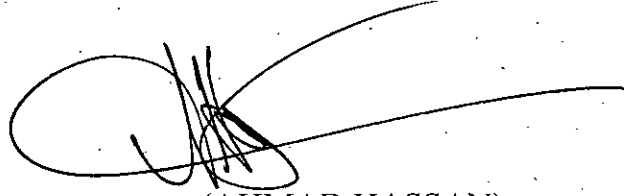
8. Facts mention in para-6 above were in the knowledge of the respondents but kept mum and innocent officials, who performed duty diligently fell victim to their highhandedness and got punishment for offences not committed by them. Instead of appreciating their performance, the respondents implicated them in a false/fabricated case. It shows that SHO and other staff of concerned Police Station were hand in glove with drug paddlers.

9. As a sequel to above, the appeal is accepted, impugned order dated 30.05.2018 and 21.06.2018 are set aside and the appellants are reinstated in service. The respondents are directed to conduct de-novo within a period of ninety days

from the date of receipt of this judgment. The issue of back benefits shall be subject to the outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record room.



(HAMID FAROOQ DURRANI)
CHAIRMAN



(AHMAD HASSAN)
MEMBER
Camp Court Abbottabad

ANNOUNCED
17.06.2019

ORDER

17.06.2019

Appellant with counsel and Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Misal Khan, ASI for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today placed on file, the appeal is accepted, impugned order dated 30.05.2018 and 21.06.2018 are set aside and the appellants are reinstated in service. The respondents are directed to conduct de-novo within a period of ninety days from the date of receipt of this judgment. The issue of back benefits shall be subject to the outcome of the de-novo enquiry. In the circumstances, parties are left to bear their own costs. File be consigned to the record room.



(Hamid Farooq Durrani)
Chairman




(Ahmad Hassan)
Member
Camp Court Abbottabad

ANNOUNCED
17.06.2019

Service Appeal No. 852/2018


19.02.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Misal Khan, Head Constable for the respondents present. Written reply on behalf of respondents not submitted. Learned Deputy District Attorney for the respondents requested for adjournment. Adjourned. To come up for written reply/comments on 21.03.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad


21.03.2019

Appellant in person present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Misal Khan, Head Constable for the respondents present. Written reply on behalf of respondents not submitted. Learned Deputy District Attorney requested for further adjournment. Adjourned to 15.04.2019 for written reply/comments before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

15.04.2019

Counsel for the appellant present. Mr. Muhammad Bilal, DDA alongwith Mr. Misal Khan, ASI for respondents present. Written reply on behalf of respondents submitted which is placed on file. Case to come up for rejoinder and arguments on 17.06.2019 before DB at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

15.11.2018

None for the appellant present. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 20.12.2018 at camp court Abbottabad.


Chairman
A/Abad


20.12.2018

Mr. Muhammad Aslam Tanoli, Advocate for appellant present.

Learned counsel for the appellant contends that before passing of impugned order of dismissal from service no proper enquiry as required by law was held. That the appellant was not afforded any opportunity to defend himself. On the other hand the Departmental Appellate Authority failed to apply his conscious mind and the appeal was rejected in stereotyped manner.

Points raised merit admission of appeal for regular hearing. Admit. The appellant is directed to deposit of security and process fee within 10 days. Thereafter notices be issued to the respondents for submission of written reply/comments on 19.02.2019 before the S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee


Chairman
Camp court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 852 /2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/07/2018	<p>The appeal of Mr. Nadeem Shahzad presented today by Mr. Muhammad Aslam Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 2/7/18</p>
2-	11-07-2018	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>29-08-2018</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p> <p><i>29-8-18.</i></p> <p><i>cannot pay the appellant present. Due to summer vacation, case to come up from the same on 29/9/18, at camp court A/Abad.</i></p> <p style="text-align: right;"><i>[Signature]</i> Chairman Camp court, A/Abad</p>
	19.09.2018	<p>Since 21st September, 2018 has been declared as public holiday on account of Moharram, therefore, case is adjourned to 15.11.2018 for preliminary hearing before the S.B at camp court, Abbottabad.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman Camp court, A/Abad</p>

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No... 852/18

Nadeem Shahzad S/O Mohammad Afzal Khan (Ex-Constable No.525, District Police Haripur) R/O Village Jamia Utman, Tehsil & District Haripur

Appellant

VERSUS

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

Respondents

SERVICE APPEAL

INDEX

S/N	Description of Document	Ann- exure	Page No.
1.	Appeal		01-10
2.	Charge Sheet 05-03-2018	"A"	11-12
3.	Reply to Charge Sheet dated 11-03-2018	"B"	13-14
4.	Final Show Cause Notice Dated 23-05-2018	"C"	15
5.	Reply to Final Show Cause Notice dt.25-5-18	"D"	16-17
6.	Order dated 30-05-2018 of DPO Haripur.	"E"	18
7.	Departmental appeal dated 08-06-2018.	"F"	19-23
8.	Order dated 21-06-18 of RPO Abbottabad.	"G"	24
9.	Daily Diaries of departure & arrival, Murasila, & Recovery Memo all dt.27-02-18	"H,I,J,K"	25-27
10.	Challan, Application, Order all dt.28-02-18	"L,M,N"	28-30
11.	Application, Order & daily dairy dt.08-03-18	"O,P,Q"	31-34
12.	Application, Daily dairy No.12 dt. 2-3-18	"R,S"	35-40
13.	Application & FIR 01-03-2018	"T,U"	41-42
14.	Wakalatnama		

THROUGH

Seal
APPELLANT

M. Aslam Tanoli
(MOHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
AT HARIPUR

Dated: 02-07-2018

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**BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 852/18

Nadeem Shahzad S/O Mohammad Afzal Khan (Ex-Constable No.525, District Police Haripur) R/O Village Jamia Utman, Tehsil & District Haripur

Khyber Pakhtunkhwa
Service Tribunal

Appellant

Diary No. 1105

VERSUS

Dated 02-7-2018

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

Respondents

SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST ORDER DATED 30-05-2018 OF THE DISTRICT POLICE OFFICER HARIPUR WHEREBY THE APPELLANT HAS BEEN AWARDED WITH MAJOR PENALTY OF DISMISSAL FROM SERVICE AND ORDER DATED 21-06-2018 OF THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY APPELLANT'S DEPARTMENTAL APPEAL HAS BEEN REJECTED.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH THE ORDERS DATED 30-05-2018 AND 21-06-2018 OF RESPONDENTS NO. 2 & 3 MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE RE-INSTATED IN HIS SERVICE FROM THE DATE OF DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respectfully sheweth,

1. That appellant while posted at Police Station, KTS, Haripur was served upon with a Charge Sheet alongwith statement of allegations issued under No. 37-39/PA dated 05-03-2018 by the District Police Officer Haripur. **(Copy of the Charge Sheet dated 05-03-2018 is attached as Annex- "A")**.

Filed to-day

Registrar

27/18

2

2. That on 11-03-2018 the aforementioned Charge Sheet was replied by the appellant explaining all facts and circumstances of the matter in detail and straightaway denying the allegations as recorded against him in the Charge Sheet being incorrect and baseless. **(Copy of reply to the Charge Sheet dated 11-03-2018 is attached herewith as Annex-"B")**.
3. That thereafter the appellant was served with a Final Show Cause Notice dated 23-05-2018 by the District Police Officer Haripur with the same allegations as in the Charge Sheet. **(Copy of the Final Show Cause Notice dated 23-05-2018 is attached as Annex-"C")**.
4. That the aforementioned Final Show Cause Notice was replied by the appellant on 25-05-2018 with the same statement as that of Charge Sheet and the allegations were vehemently denied. **(Copy of reply dated 25-05-2018 to the Final Show Cause Notice is attached as Annex-"D")**.
5. That the District Police Officer Haripur without taking into consideration the detailed reply to the Charge Sheet as well as Final Show Cause Notice submitted by the appellant awarded him with Major Penalty of **"Dismissal from service"** vide impugned order dated 30-05-2018 and that too without any proof or reason. **(Copy of the order dated 30-05-2018 is attached as Annex-"E")**.
6. That aforementioned order dated 30-05-2018 of the District Police Officer Haripur was appealed against on

3

08-06-2018 before the Regional Police Officer, Hazara Region, Abbottabad, explaining all facts and circumstances of the matter. **(Copy of departmental appeal dated 08-06-2018 is attached as Annex-"F").**

7. That the Regional Police Officer, Hazara Region, Abbottabad (Appellate Authority) vide his order dated 21-06-2018 rejected the departmental appeal of the appellant without giving any heed to the details of the matter advanced by appellant. **(Copy of the order dated 21-06-2018 of RPO is attached as Annex-"G").**
8. That so far as the allegations leveled against the appellant are concerned, the same are totally incorrect and baseless because the appellant has performed his assigned duty with dedication, honesty and strictly in accordance with law, police rules and procedure in vogue and committed no fault on his part.
9. That in fact on 27-02-2018, while appellant alongwith Babar Mukhtiar IHC No.296, in uniform, in a private vehicle on routine mobile duty at 1940 hours present at By-pass Road near Choar Colony noted a suspected person in the light of vehicle. He was stopped and searched and charas wrapped in polythene shopper was recovered from him. When inquired the accused disclosed his name as Zameer Khan S/O Karam Dad. Charas when weighed it was found 480 grams. 05 grams charas was separated and two parcels, one for FSL and the other for rest of the charas, were prepared. During his bodily search a sum of Rs. 45010/- and one Nokia Mobile Model No.6300 were also

4

recovered. Recovery Memo and Murasila were drafted and sent to PS KTS for recording FIR. **(Copies of Daily Dairies Showing departure & arrival, Murasila and Recovery Memo all dated 27-02-2018 are attached as Annex-"H, I, J & K")**.

10. That on 28-02-2018, complete challan was submitted and the accused in police custody was produced before the Judicial Magistrate Haripur. Accused through his written application pleaded his guilt before the Judicial Magistrate, whereupon he was convicted and sentenced U/S- 3/4 EHO to undergo 02 days SI and to pay Rs.500/- as a fine. **(Copies of Challan, application & punishment order all dated 28-02-2018 are attached herewith as "L, M & N")**.
11. That on 04-03-2018, after release from Jail the accused through his counsel submitted an application before the Judicial Magistrate Haripur for return of his recovered money of Rs. 45010/- and Nokia Mobile Phone with SIM No.0336-5401520 whereupon order dated 07-03-2018 was passed and the accused received his amount and Mobile Phone from PS KTS. **(Copies of application, Court Order and Daily Dairy No.12 dated 08-03-2018 are attached as "O, P & Q")**.
12. That on 28-02-2018 one Mumraiz Khan S/O Karam Dad (real brother of the accused Zameer Khan) submitted a false and fabricated application, with malafide intention in retaliation of his brother's arrest at the hands of appellant, stating therein that appellant has taken Rs.45000/- as bribe from him not to register FIR

5

against the accused but despite receiving money the FIR has been registered. The application was marked to the SHO concerned who ordered that an FIR be registered against the appellant U/S-161 PPC. The said application was given Diary No.482 dated 28-02-2018. Even FIR No.127 U/S-161 PPC was registered wherein SHO KTS tried to arrest the appellant. **(Copies of application, DD No.12 dated 2-3-18 are attached as Annex-"R & S").**

13. That subsequently the said application was replaced with another one by making improvement in the allegations with collaboration of police officers just to cause serious damage to the appellant in his service which ultimately resulted into his dismissal from service and registration of an other FIR No.127 dated 01-03-2018 U/S-382/342/506/34 and said application was also given the Diary No. 482 dated 28-02-2018 just to conceal their malafide. **(Copies of both the application and FIR dated 01-03-2018 are attached as Annex-T & U).**
14. That it is incorrect that on 27-02-2018 the appellant in plain clothes arrested accused Zameer near Paris Hotel GT road Haripur and took him to Chungi No.2 KTS, or accused was threatened or Rs.45000/- were extracted or a false FIR was registered against him. In fact all this was done as retaliation for arrest of accused otherwise element of truth did not exist in the allegations as leveled against the appellant.

6

15. That appellant has rendered more than 16 years service in the police department and is well built literate police officer equipped with departmental trainings, courses and experience, *and awarded with Commendation Certificates which are attached.*
16. That the Appellant has been awarded with major punishment of "Dismissal from Service" illegally, unlawfully against the facts and circumstances without any reason and rhyme, hence this service appeal, inter alia, on the following:

GROUNDS

- a) That both the impugned orders dated 30-05-2018 and 21-06-2018 of the departmental authorities are void ab-initio, illegal, unlawful, without lawful authority and have been passed perfunctorily, arbitrarily, whimsical and slipshod in manner, against the facts and circumstances of the case, without any reason and proof, hence are liable to be set aside.
- b) That respondents have not treated appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of the Constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders, which are unjust, unfair and hence not sustainable in the eye of law.
- c) That no proper departmental inquiry was conducted before awarding the appellant with major punishment of "Dismissal from Service" of which conduction was

7

mandatory under law for dispersion of justice at preliminary stages during the course of departmental inquiries.

- d) That neither the appellant was confronted with documentary proof, if any, against him nor was provided with the copy of inquiry report, if any, before issuance of Final Show Cause Notice, nor was afforded with the opportunity of personal hearing. Hence the mandate of natural justice was violated.
- e) That the appellate authority has also failed to abide by the law and even did not look into consideration the grounds taken in the memo of appeal. Thus the impugned order of the appellate authority is contrary to the law as laid down in the KPK Police (Efficiency and Disciplinary) Rules 1975 read with Section 24-A of the General Clauses Act 1897 read with Article 10A of the Constitution of Islamic Republic of Pakistan 1973.
- f) That the appellant is innocent and has discharge his assigned duties in accordance with law, police rules and procedure in vogue with full sense responsibility and honesty without any omission, commission or fault on his part for which he has been awarded with above referred major punishment of dismissal from service.

8

PRAYER:

It is, therefore, humbly prayed that on acceptance of instant service appeal, the impugned orders dated 30-05-2018 and 21-06--2018 passed by the District Police Officer Haripur and the Regional Police Officer Hazara Region Abbottabad respectively whereby the appellant has been awarded with the punishment of "**Dismissal from service**" and his departmental appeal rejected may graciously be set aside and the appellant be re-instated in his service from the date of dismissal with all consequential service back benefits in the interest of justice.

Any other relief which this Honourable Tribunal deems fit in the circumstance of the case may also graciously be awarded.

THROUGH

Aslam
APPELLANT

M. Aslam
(MOHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
AT HARIPUR

Dated: 02-07-2018

Verification

It is verified that the contents of instant appeal are true and correct to the best of my knowledge and nothing has been concealed there from.

Dated: 02-07-2018

Aslam
Appellant

9

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Nadeem Shahzad S/O Mohammad Afzal Khan (Ex-Constable
No.525, District Police Haripur) R/O Village Jamia Utman,
Tehsil & District Haripur

Appellant

VERSUS

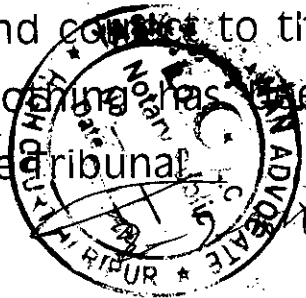
1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

Respondents

SERVICE APPEAL

AFFIDAVIT:

I, Nadeem Shahzad appellant do hereby solemnly declare
and affirm on oath that the contents of the instant Service
Appeal are true and correct to the best of my knowledge
and belief and nothing has been suppressed from this
Honourable Service Tribunal.



Deel.

Deponent/Appellant

Dated: 02-07-2018

Identified By:

M. Aslam

Mohammad Aslam Tanoli
Advocate High Court
At Haripur,

Deel

Appellant

18

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Nadeem Shahzad S/O Mohammad Afzal Khan (Ex-Constable
No.525, District Police Haripur) R/O Village Jamia Utman,
Tehsil & District Haripur

Appellant

VERSUS

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

Respondents

SERVICE APPEAL

CERTIFICATE

It is certified that no such Appeal on the subject has ever
been filed in this or any other court prior to the instant
one.

Deel.

APPELLANT

Dated: 02 -07-2018

(11)

Annex A

CHARGE SHEET

- (1) I, *Syed Khalid Hamdani (PSP, QPM)*, District Police Officer, Haripur as competent authority, hereby charge you Constable Nadeem No. 525 as enclosed statement of allegations.
- (2) You appear to be guilty of misconduct under Police Efficiency & Discipline Rules 1975 and have rendered yourself liable to all or any of the penalties specified in the said Rules.
- (3) You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet and statement of allegation to the Committee/Enquiry Officer as the case may be.
- (4) Your written defense, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- (5) Intimate whether you desire to be heard in person or otherwise.
- (6) A statement of allegations is enclosed.

(Syed Khalid Hamdani) PSP, QPM
District Police Officer
Haripur

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—
Allesed
Dad.

DISCIPLINARY ACTION

12

I, **Syed Khalid Hamdani (PSP, QPM)**, District Police Officer, Haripur as competent authority of the opinion that you **Constable Nadeem No. 525** have rendered yourself liable to be proceeded against as you committed the following acts/omissions within the meaning of Police Efficiency & Discipline Rules 1975.

STATEMENT OF ALLEGATION

"That you while posted at PS KTS you along with HC Baber Mukhtiar No.206 in plane clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem dad Khan presently r/o chungi No.11 TIP near Paris Hotel G.T road Haripur and took him at Chungi No.2 KTS and threaded him to register a false narcotics case if he failed to give illegal gratification of Rs.60000, through bargain you alongwith Constable Nadeem extracted Rs.45000 from him and also charged him in case FIR No. 120 dated 27.03.2018 u/s 3/4 EHO PS KTS, you committed an offense vide FIR No.127 dated 27.02.2018, u/s 382,342,506/34PPC PS KTS, your involvement in heinous criminal case is gross misconduct under police efficiency and discipline Rules 1975, hence, charge sheeted"

(2) For the purpose of scrutinizing the conduct of the said accused officer with reference to the above allegations, an Enquiry Committee consisting of the following is constituted.

Mr. Shams ur Rehman SP INV Haripur

(3) The Enquiry Officer/Committee shall in accordance with the provision of this Ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action against the accused.

(4) The accused and a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer/Committee.

(**Syed Khalid Hamdani**) PSP, QPM
District Police Officer
Haripur

No: 37 - 39 /PA, dated Haripur the 05/03 /2018.
Copy of above is submitted to the: -

- 1) Regional Police Officer, Hazara Region, Abbottabad please.
- 2) Enquiry Officer for initiating proceedings against the said accused under Police Efficiency & Discipline Rules 1975.
- 3) **Constable Nadeem No. 525** with the direction to submit his defense within 7 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer on the date, time and place fixed for the purpose of departmental proceedings.

Alleged
Dach

District Police Officer
Haripur

13

Annex-B

To

Mr. Shams-ur-Rehman,
The Superintendent of Police,
Investigation,
(Inquiry Officer)
Haripur.

SUBJECT:- REPLY TO THE CHARGE SHEET.

Respected Sir,

With most respect it is submitted that Charge Sheet alongwith statement of allegations issued by the worthy District Police Officer Haripur vide No.37-39 dated 05-03-2018 has been delivered to me on 06-03-2018. My detail reply is as under:-

1. That on 27-02-2018, I alongwith IHC Babar Mukhtiar, Constable Akash No.728 and Constable Zahid No. 4696, in uniform, in a private vehicle was on routine mobile duty. At 1940 hours when present at Bypass Road near Choar Colony a suspected man was seen in the light of vehicle. He was stopped and searched and charas wrapped in polythene shopper was recovered from him. While weighing the same on the spot, it was found 480 grams. 05 grams charas was separated and two parcels, one for FSL and the other for rest of the charas, were prepared. On his bodily search a sum of Rs. 45010/- and one Nokia Mobile Model No.6300 were also recovered. Recovery Memo and Murasila were drafted on the spot by IHC Babar Mukhtiar and sent to PS KTS for recording FIR. (Copies of Daily Dairies Showing departure and arrival, Murasila and Recovery Memo all dated 27-02-2018 are attached herewith as "A" to "D").
2. That on 28-02-2018, a complete challan was submitted and the accused produced in custody before the Judicial Magistrate Haripur. Accused through his written application pleaded his guilt before the Judicial Magistrate, whereupon he was convicted and sentenced under Section $\frac{3}{4}$ EHO to undergo 02 days SI and to pay the fine of Rs.500/-. (Copies of Challan, application and punishment order all dated 28-02-2018 are attached herewith as "E, F & G").
3. That 04-03-2018, after release from Jail the accused submitted application through his Counsel before the Judicial Magistrate Haripur for return of his recovered money of Rs. 45010/- and a Nokia Mobile Phone alongwith SIM No.0336-5401520 whereupon order dated 07-03-2018 was passed and the accused received his amount and Mobile Phone from PS KTS. (Copies of application, Order and Daily Dairy No.12 dated 08-03-2018 are attached as "H, I & J").
4. That it is incorrect and baseless that on 27-02-2018 I was without uniform and in plane clothes or accused Zameer was arrested near Paris

Arrested
Dad.

164

Hotel GT road Haripur and took him to Chungi No.2 KTS, or accused was threatened or Rs.45000/- were extracted from him or a false FIR was registered against him. In fact the persons having enmity against me have woven the web so craftily that false and truth could not be separated and the allegations emerged from false, fabricated and manipulated disinformation communicated to the worthy District Police Officer Haripur which prejudiced him against me and resulted in to issuing of Charge Sheet under reply. Otherwise even an iota of truth does not exist in the allegations as incorporated in the instant Charge Sheet. The factual situation has been averred in preceding paragraphs.

5. That if there had been any truth in the allegations as mentioned in the instant Charge Sheet then on 28-02-2018 when the accused Zameer Khan was produced before the Judicial Magistrate Haripur had ample opportunity to have disclosed that he was innocent, wrongly arrested, charas was planted upon him and a sum of Rs.45000/- were extracted from him by the local police instead of pleading his guilt through written application. Further more after his release; he submitted application through his Counsel for return of amount and Nokia Mobile alongwith SIM recovered at the time of his bodily search for which release order was passed and he received these things from PS KTS which the accused received from the Moharrir PS KTS.
6. That from aforementioned facts it emerges that I was, falsely and under complete machination, involved in the instant case by persons having personal grudge and vendetta against me. Because during my posting at PS KTS, I had arrest 65 strong narcotics paddlers against whom cases were registered. I have discharged my duties with due diligence, devotion and honesty. (List o accused Narcotics Offenders is attached as "K").
7. That I am totally innocent in the instant case and the charges as leveled in the Charge Sheet are nothing more than mere allegations hence vehemently denied.
8. That if I am provided with the opportunity of personal hearing then I shall really try my best to bring the all the facts and circumstances of the matter in to the knowledge of your goodself and to clear my position by proving myself as innocent.

In view of the above facts and circumstances it is request that necessary recommendation may kindly be made for filing of instant Charge Sheet without further proceeding being charges incorrect, false, baseless, concocted and fabricated ones. Thanking you sir in anticipations.

*Alleged
Deed.*

Dated: 11-03-2018

Your Obedient Servant

(Nadeem Shahzad)

Constable No. 525

Police Lines Haripur

15

FINAL SHOW CAUSE NOTICE

Annex-C

I, **Syed Khalid Hamdani (PSP, QPM)**, District Police Officer, Haripur as Competent Authority under Police Rules 1975, do hereby serve Final Show Cause Notice upon you **FC Nadeem No. 525** on the following grounds: -

"That you while posted at PS KTS you along with HC Baber Mukhtiar no.206 in plane clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem dad Khan presently r/o chungi No.11 TIP near Paris Hotel G.T road Haripur and took him at Chungi No.2 KTS and threaded him to register a false narcotics case if he failed to give illegal gratification of Rs.60000, through bargain you alongwith Constable Nadeem extracted Rs.45000 from him and also charged him in case FIR No. 120 dated 27.03.2018 u/s 3/4 EHO PS KTS, you committed an offense vide FIR No.127 dated 27.02.2018, u/s 382,342,506/34PPC PS KTS, your involvement in heinous criminal case is gross misconduct on your part under Police E&D Rules 1975"

(1) For the purpose of scrutinizing the conduct on your part with reference to the above allegation, you was serve with Charge Sheet/Statement of allegation and Superintendent of Police, Investigation, Haripur was appointed as enquiry officer against you for the conduct of proper departmental enquiry vide this office Endst No. 37-39 dated 05.03.2018.

(2) The enquiry officer after conducting proper departmental enquiry submitted his finding vide his office letter No. 812 dated 22.05.2018, in which he had the charges of misconduct proved and recommended for minor punishment under section-4 of the KPK Police E&D Rules 1975.

(3) Keeping in view of above allegation on your part, you are hereby called upon. To Show Cause within (07) days of the removed of this Final Show Cause notice as to why you should not be awarded punishment under the Police Rule 1975, if your written reply is not received with in stipulated period. It shall be presumed, that you have no defense to affirm, you are also allowed to appear before the undersigned, if you so desired.

(Syed Khalid Hamdani) PSP, QPM
District Police Officer
Haripur

No. **129-30** / dated Haripur the **23 / 05 / 2018**

Copy of above is submitted to the Regional Police Officer, Hazara Region Abbottabad please.

Alksted
Bar

District Police Officer
Haripur

16

Annex - D

To

The District Police Officer,
Haripur

SUBJECT:- REPLY TO THE SHOW CAUSE NOTICE.

Respected Sir,

With most respect it is submitted that the Final Show Cause Notice issued vide No. 129-30 dated 23-05-2018 has been delivered to me. Earlier to this I was served upon with a Charge Sheet with the same allegation which had been replied in detail explaining all facts of the case. Nevertheless, the instant Final Show Cause Notice is replied as under:-

1. That on 27-02-2018, I alongwith IHC Babar Mukhtiar, Constable Akash No.728 and Constable Zahid No. 4696, in uniform, in a private vehicle was on routine mobile duty. At 1940 hours when present at Bypass Road near Choar Colony a suspected man was seen in the light of vehicle. He was stopped and searched and charas wrapped in polythene stopper was recovered from him. While weighing the same on the spot, it was found 480 grams. 05 grams charas was separated and two parcels, one for FSL and the other for rest of the charas, were prepared. On his bodily search a sum of Rs. 45010/- and one Nokia Mobile Model No.6300 were also recovered. Recovery Memo and Murasila were drafted on the spot by IHC Babar Mukhtiar and sent to PS KTS for recording FIR.
2. That on 28-02-2018, a complete challan was submitted and the accused produced in custody before the Judicial Magistrate Haripur. Accused through his written application pleaded his guilt before the Judicial Magistrate, whereupon he was convicted and sentenced under Section 3/4 EHO to undergo 02 days SI and to pay the fine of Rs.500/-.
3. That 04-03-2018, after release from Jail the accused submitted application through his Counsel before the Judicial Magistrate Haripur for return of his recovered money of Rs. 45010/- and a Nokia Mobile Phone alongwith SIM No.0336-5401520 whereupon order dated 07-03-2018 was passed and the accused received his amount and Mobile Phone from PS KTS.
4. That it is incorrect and baseless that on 27-02-2018 I was without uniform and in plane clothes or accused Zameer was arrested near Paris Hotel GT road Haripur and took him to Chungi No.2 KTS, or accused was threatened or Rs.45000/- were extracted from him or a false FIR was registered against him. In fact the persons having enmity against me have woven the web so craftily that false and truth could not be separated and the allegations emerged from false, fabricated and manipulated disinformation communicated to the worthy District Police Officer Haripur which resulted into initiating of instant inquiry. Otherwise even an

Attested
Dad.



iota of truth does not exist in the allegations as leveled against me. The factual situation has been averred in preceding paragraphs.

5. That if there had been any truth in the allegations as mentioned in the instant Final Show Cause Notice then on 28-02-2018 when the accused Zameer Khan was produced before the Judicial Magistrate Haripur had ample opportunity to have disclosed that he was innocent, wrongly arrested, charas was planted upon him and a sum of Rs.45000/- were extracted from him by the local police instead of pleading his guilt through written application. Further more after his release; he submitted application through his Counsel for return of amount and Nokia Mobile alongwith SIM recovered at the time of his bodily search for which release order was passed and he received these things from PS KTS which the accused received from the Moharrir PS KTS.
6. That from aforementioned facts it emerges that I was, falsely and under complete machination, involved in the instant case by persons having personal grudge and vendetta against me. Because during my posting at PS KTS, I had arrest 65 strong narcotics paddlers against whom cases were registered. I have discharged my duties with due diligence, devotion and honesty.
7. That I am totally innocent in the instant case and the charges as leveled in the Final Show Cause Notice are nothing more than mere allegations hence vehemently denied.
9. That if I am provided with the opportunity of personal hearing then I shall really try my best to bring the all the facts and circumstances of the matter in to the knowledge of your goodself and to clear my position by proving myself as innocent.

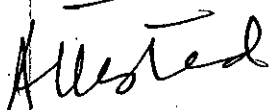

In view of the above facts and circumstances it is request that the instant Final Show Cause Notice may kindly be filed without further proceeding. Thanking you sir in anticipations.

Your Obedient Servant


(Nadeem Shahzad)

Constable No. 525
Police Lines Haripur

Dated: 25-05-2018

(18) - A - 12 -
ORDER

Annex - 5

Constable Nadeem Khan NO.525, while posted in PS KTS, Haripur, in plain clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem Dad Khan presently r/o Chungi No.11 TIP, near paris Hotel G,T road Haripur and took him at Chungi NO.02, KTS, and threaded him to register a false narcotics case, if he failed to give illegal gratification of Rs.60000/- through bargain he along with Head Constable Babar Mukhtiar No.206, extracted 45000/- from him, and also charged him in case FIR No.120 dated 27.02.2018, u/s 3/4 EHO, PS KTS, by doing illegal acts and omission in deviation of lawful duties, he implicated himself in criminal offence, vide case FIR No.127 dated 07.03.2018, u/s 382/342/506/34 PPC PS KTS, the acts and omissions of defaulter official were misconduct under Khyber Pakhtunkhwa, police efficiency and discipline rules 1975. therefore, He was served with statements of allegations containing charges of misconduct, vide this office Endst No.37-39/PA dated 05.03.2018.

To probe the allegations, Mr. Shams UR Rehman Superintendent of Police, Investigation, Haripur was appointed as enquiry officer, who conducted proper departmental enquiry and submitted his finding, vide his office Memo No.812/PA dated 22.05.2018. in which, he held the accused police official guilty, on receiving recommendation of enquiry officer, the accused official was served with final show cause notice, vide this office endst: NO.129-130 dated 23.05.2018 to which he submitted his reply which was not found satisfactory, so he was called in orderly room for personal hearing, the accused police official was given right of personal hearing and self defense.

Having gone through enquiry papers recommendation of enquiry officer and after personal hearing of accused Constable Nadeem Khan No.525, the charges of misconduct against the defaulter official stands proved, so, I am fully satisfied that Constable Nadeem Khan committed gross misconduct, therefore, I, Syed Khalid Mehmood Hamdani, District Police Officer, Haripur being competent authority under Khyber Pakhtunkhwa Police efficiency and discipline rules 1975, awarded major punishment of "Dismissal from service" with immediate effect.

*Allotted
Bad.*

Order announced.
OB No: 375 dated 05-05-2018

Syed Khalid Mehmood Hamdani
District Police Officer
Haripur

19

Annex-F

BEFORE THE REGIONAL POLICE OFFICER, HAZARA REGION
ABBOTTABAD

(Departmental appeal by Nadeem Khan Ex-Constable No. 525 District Police Haripur)

DEPARTMENTAL APPEAL AGAINST ORDER OB NO.378 DATED
30-05-2018 PASSED BY THE DISTRICT POLICE OFFICER, HARIPUR
WHEREBY THE APPELLANT HAS BEEN AWARDED WITH THE
EXTREME PUNISHMENT OF "DISMISSAL FROM SERVICE".

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL
APPEAL ORDER DATED 30-05-2018 OF THE DISTRICT POLICE
OFFICER HARIPUR MAY KINDLY BE SET ASIDE AND THE
APPELLANT BE RE-INSTATED IN SERVICE FROM THE DATE OF
DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

With reverence and humble submission the following few lines are laid down before your Highness for kind consideration and favorable orders please.

1. That the District Police Officer, Haripur vide OB No.378 dated 30-05-2018 has awarded the appellant with the extreme penalty of "Dismissal from Service" with immediate effect. **(Copy of the order dated 30-05-2018 is attached as "A").**
2. That instant order of the District Police Officer Haripur is against the facts & circumstances of the matter and passed in a whimsical manner contrary to the procedure as envisaged by KPK Police (E&D) Rules-1975.
3. That the appellant was served upon with a Charge Sheet alongwith statement of allegations issued under No.37-39 dated 05-03-2018 by the District Police Officer Haripur. **(Copy of Charge Sheet dated 05-03-2018 and Statement of Allegations is attached as "B").**
4. That aforementioned Charge Sheet was replied in detail by the appellant explaining all facts and circumstances of the matter. **(Copy of reply is attached herewith as "C").**

Attested
Dad.

5. That thereafter the appellant was issued with the Final Show Cause Notice dated 23-05-2018 by the District Police Haripur by incorporating same allegations as in the Charge Sheet. **(Copy of the Final Show Cause Notice dated 23-05-2018 is attached as "D").**
6. That on 25-05-2018 the appellant submitted reply to the Final Show Cause Notice to the District Police Officer Haripur clarifying his position by expressing facts and circumstances of the situation. **(Copy of reply to Final Show Cause Notice dated 25-05-2018 is attached as "E").**
7. That no proper departmental inquiry was conducted. The so called Inquiry Officer without paying any heed to the procedure set forth by law for conducting departmental inquiries to dispense justice at preliminary stages and without taking into consideration the material brought on record by appellant and superficially completed his process and submitted inquiry report to the District Police Officer Haripur.
8. That after receiving inquiry report, the District Police Officer Haripur awarded the appellant with Major Punishment of "Dismissal from Service" without any proof and without providing opportunity of personal hearing.

FACTS:

9. That on 27-02-2018, while appellant alongwith IHC Babar Mukhtiar, Constable Akash No.728 and Constable Zahid No. 4696, in uniform, in a private vehicle on routine mobile duty at 1940 hours present at Bypass Road near Choar Colony saw a suspected man in the light of vehicle. He was stopped and searched and charas wrapped in polythene shopper was recovered from him. On weighing the same on the spot, it was found 480 grams. 05 grams charas was separated and two parcels, one for FSL and the other for rest of the charas, were prepared. During his bodily search a sum of Rs. 45010/- and one Nokhia Mobile Model No.6300 were also recovered.

Alisul
Dad.

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Recovery Memo and Murasila were drafted and sent to PS KTS for recording FIR. (Copies of Daily Dairies Showing departure and arrival, Murasila and Recovery Memo all dated 27-02-2018 are attached herewith "F to I").

10. That on 28-02-2018, complete challan was submitted and the accused in police custody produced before the Judicial Magistrate Haripur. Accused through his written application pleaded his guilt before the Judicial Magistrate, whereupon he was convicted and sentenced under Section 3/4 EHO to undergo 02 days SI and to pay Rs.500/- as a fine. (Copies of Challan, application and punishment order all dated 28-02-2018 are attached herewith as "J, K & L").
11. That on 04-03-2018, after release from Jail the accused through his counsel submitted an application before the Judicial Magistrate Haripur for return of his recovered money of Rs. 45010/- and Nokia Mobile Phone with SIM No.0336-5401520 whereupon order dated 07-03-2018 was passed and the accused received his amount and Mobile Phone from PS KTS. (Copies of application, Court Order and Daily Dairy No.12 dated 08-03-2018 are attached as "M, N & O").
12. That it is incorrect that on 27-02-2018 the appellant in plane clothes arrested accused Zameer near Paris Hotel GT road Haripur and took him to Chungi No.2 KTS, or accused was threatened or Rs.45000/- were extracted or a false FIR was registered against him. In fact some incorrect information was communicated to the worthy District Police Officer Haripur which resulted into initiation of departmental inquiry. Otherwise element of truth did not exist in the allegations as leveled against the appellant.
13. That if there had been any truth in the said allegations then on 28-02-2018 when the accused Zameer Khan produced before the Judicial Magistrate Haripur had ample opportunity to have claimed his innocence and charged the appellant for extracting a sum of Rs:45000/- instead of pleading his guilt

Musted
Dad,

22

through written application. Further more after release; the accused submitted application through counsel before the Judicial Magistrate Haripur for return of his recovered amount and Nokia Mobile with SIM etc for which release order was passed and he received these articles from PS KTS.

14. That the web was woven by the persons behind it just to cause the appellant harm in his service and defame him. In this respect appellant would refer the application whereupon the departmental inquiry initiated and FIR was registered against him. There are two applications. Both the applications bear the same diary No. 482 and date 28-03-2018 and remarks of the DPO Haripur. The first was changed and the second was written and included in the record just to strength the allegation against appellant. Earlier on the back of first application the SHO ordered that a case under S-161 PPC be registered, while upon 2nd application a case FIR No.127 dated 01-03-2018 U/S-382,342,506,34 PPC has been got registered against the appellant which tantamount to manipulation and scheme against the appellant with malafide intention. **(Copies of both the applications are attached as "P & Q").**
15. That aforementioned facts will reveal that appellant was, falsely involved in the instant case by person having grudge against him. Otherwise appellant has discharged his duties with honestly.
16. That appellant has rendered more than ...years service in the police department and is well built literate police officer equipped with departmental trainings, courses and experience. Appellant has been awarded with numerous commendation certificate alongwith cash rewards on occasions by his High-Ups for render tremendous services. Appellant is the only bread earner of his family consisting upon his old/ailing parents and minor school going children. **(Copies of the Commendation Certificates are attached).**

Alister
Dad

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17. That if appellant is provided with the opportunity of personal hearing then he shall try his best to explain his position and prove himself as innocent.

In view of the facts and circumstances narrated here above it is earnestly requested that on acceptance of instant departmental appeal impugned order dated 30-05-2018 may kindly be set aside and the appellant be re-instated in his service from the date of dismissal with all consequential service back benefits. Appellant shall always pray for your good health and long life.

Your Obedient Servant



(Nadeem Shahzad)

Mohammad Afzal Khan

Ex-Constable No. 525

District Police Haripur

Address: Village Jamia Utman
Tehsil & District Haripur

Dated: 8-06-2018

Cell No.0336-9006355

Accepted
Dad

24 - Annex-9

ORDER

This order is hereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 submitted by *Constable Nadeem Khan No:525* Haripur District against the order of punishment i.e. *Dismissal from service* awarded to him by the DPO Haripur, vide his office OB No: 378, dated 30.05.2018.

Facts leading to punishment awarded to him are that he while posted at PS KTS, he alongwith Constable Nadeem No: 525 in plain clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan r/o Chungi No:11 TIP near Paris Hotel GT Road Haripur and took him at Ghungi No:2 KTS and threatened him to register a false narcotics case if he failed to give illegal gratification of Rs:60000/- through bargain he alongwith Constable Nadeem extracted Rs:45000/- from him and also charged him in case FIR No:120 dated 27.02.2018 u/s EHO PS KTS.

In this regard a case FIR No: 127 dated 01.03.2018 u/s 382/342/506/34 PPC PS KTS was registered against him.

After receiving his appeal, comments of DPO were obtained, which were perused. The undersigned called appellant in O.R on 20.06.2018 where he failed to explain any plausible reason in his defence. Therefore the punishment awarded to him by DPO Haripur i.e. dismissal from service seems to be genuine, which is held and his appeal is filed.

REGIONAL POLICE OFFICER
Hazara Region Abbottabad

No. 2779 /PA Dated Abbottabad the 21-6 /2018.

Copy of above is forwarded to the District Police Officer, Haripur vide his office Memo: No: 3683/ dated 19.06.2018 for information and necessary action.

Fauji Missal containing enquiry file is returned herewith for your office record.

Accepted
Dad

REGIONAL POLICE OFFICER
Hazara Region Abbottabad

(3)

27 ²/₁₈

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Annex H

قاع CTS

~~24~~

رواگی بالبرفتار 9HC 27 ²/₁₈ وقت 27 ²/₁₈ میں جمع کئے گئے اور 225 گرام اور 1696 گرام
آکاش 728 ٹریس سے زیادہ ہونے پر ہائیڈروکسی کاربائیڈ کے لئے ہائیڈروکسی کاربائیڈ کا
کاغذ

ضابطہ عالی
نقل عطا کی اصل
mm. ps. CTS

Annex G

قاع CTS

نقل ریٹ نمبر 33 دوڑنا 27 ²/₁₈

ضابطہ عالی

33 نمبر والی بالبرفتار 9HC 27 ²/₁₈ وقت 27 ²/₁₈ میں جمع ہونے پر 24 گرام اور 24 گرام
گنت والی آبیوں دوران گنت ایک شخص کو مشہور حالت میں پانچ ضابطہ عالی
سب ضابطہ عمل میں لائی دوران طبع تلاشی مذکورہ کے بارے میں 185 گرام اور
نیز آمد کوئی جو قہر میں کرک کا 450 گرام جہاں باقی دیکھو جو قہر میں کرک کا
قہر میں کرک دریافت ہر مذکورہ نے انہماں ہمیں اولہ کرک دار سید اختر
حال میں آج ہی سب ضابطہ گرفتار کے ہمراہ لاکر دینے کے لئے درخواست
مذکورہ قاع پر لگانا اور اس میں عدالت پر لگانا

نمبر 33
نمبر
27/18

ضابطہ عالی

نقل عطا کی اصل

mm. ps. CTS

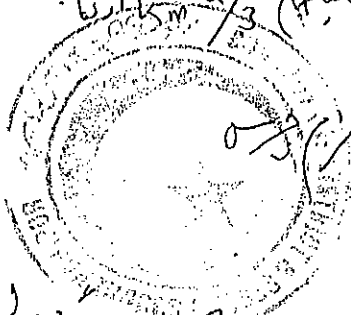
Allested
Deed.

26

Annex - J

تاریخ 27/18/1940 ع
تاریخ 27/18/1950 ع

کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا



کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

کتابت و قلم بہ بالا پاس

پروسیا 2 کتابت و قلم بہ بالا پاس 728 زانیہ 4696 کتابت و قلم بہ بالا پاس

کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

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کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

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کتابت و قلم بہ بالا پاس روز ترقی پورہ جلیب صوبہ خیبر پختونخوا

27/2/2018

0336-5601520

Attested to be a true copy
Authorized UIA 87 of
Qanoon-e-Shahadat order: 1984
07 MAR 2018
EXAMINER
District & Session Judge
Haripur

Handwritten signature

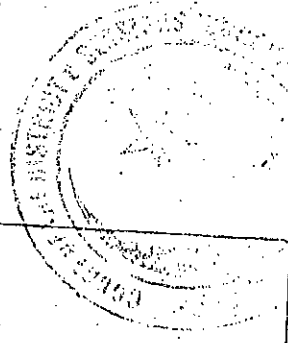
Attested
Deed.

Almas
Beech

فارم حالان کھل

1555 3/11 27-2-18 100

1	2	3		4	5	6
		نام	مقررین			
نام	مقررین	مقامات	تفصیل	تفصیل	تفصیل	تفصیل



Handwritten notes in Urdu, including a signature and various administrative details.

Handwritten notes and signatures in Urdu, including a signature that appears to be 'Amn...'.

Handwritten notes in Urdu, including a signature and administrative text.

Handwritten notes and signatures in Urdu, including a signature that appears to be 'Amn...' and a date '28/2/18'.

(29)

Amir Ali

شہادت جناب جوڈیشل مجسٹریٹ صاحب ہسٹری بورڈ

سرکار بنام: ضمیر

ذوالہ مقدمہ علت 120 مورخہ 18-02-27 جم EHO 3/4 خانہ K.T.S

درخواست اقبال جرم و صدور فیصلہ عنوان الذکر

جناب عالی! درخواست عرض ذیل ہے۔

یہ کہ سائل ملزم مقدمہ بجرم عنوان میں بخوشی و برضا مندی خود بلا جبر اقبال جرم کرنا ہوں اور اسے آپ کو عدالت کے رحم و کرم پر چھوڑتا ہوں اور کاروائی A-241 ض-ف کے حقوق سے دستبردار ہوتا ہے۔

استدعا ہے کہ مقدمہ کا ایروز فیصلہ فرمایا جا کر دائری فرمائی جاوے۔

المرقوم: 28⁰²/₂₀₁₈

Amir Ali
District & Sessions Judge
Faisalabad

ضمیر ولد محمد حاد خان سید سکڈ ہاں IIP جوڈیشل بورڈ

ضمیر خان

Attested to be a True Copy
Authorized U/A 87 of
Qanun-e-Shahadat order 198-

07 MAR 2018
EXAMINER
District & Sessions
Judge

Attested
Dad

17/4/18 JMI
 28/2/18
 28/2/18
 23/3/18
 (30) Annex-N

IN THE COURT OF SHAHID MEHMOOD, JUDICIAL MAGISTRATE-I, HARIPUR
 Case FIR No. 120, Dated 27.02.2018, under section 3/4 EHO of Police Station KTS Haripur
 Of ---01
 8.02.2018

1374
 429

Complete challan submitted by the prosecution. It be registered.
 Accused Zameer son of Karam Dad produced in custody who moved an application for disposal of his case today on the basis of plead guilty, without availing further opportunity, by relinquishing his rights to comply with the provisions of section 241-A Cr.PC. Formal charge framed against the accused of which accused pleaded his guilt and requested for mercy of the court.

Show cause notice under section 243 of the Cr.PC was given the accused but he is unable to show sufficient cause as to why he should not be convicted for the subject offence.

As accused has pleaded his guilt and left himself at the mercy of the court. More so, record is silent about the previous involvement of the accused in such like cases. Therefore, while taking lenient view accused is convicted and sentenced under section 3/4 EHO to undergo for 02 days SI and to pay the fine of Rs. 500/-. In case he fails to pay the fine, he will have to undergo SI for 01-day. Case property if any be dealt with in accordance with law. All personal belongings of accused if any be returned forthwith. File be consigned to record room after its completion and compilation.



Attested to be a true copy
 Authorized U/A FIR
 Qanoon-e-Shahadat order 1984
 07 MAR 2018
 EXAMINER
 District & Session Judge
 Haripur

SHAHID MEHMOOD,
 Judicial Magistrate-I,
 Haripur

3226 = 07-03-18
 Date of presentation of Application
 No. of Words 07 Pages
 Copying Fee
 Urgent Fee
 TOTAL
 Name of Copyist
 No. of Receipt of File 07-03-18
 Date of Preparation of Copy 07-03-18
 Date of Delivery of Copy 07-03-18

Attested
 Seal

Handwritten notes at the top of the page, including a date "10/10/10" and some illegible text.

Handwritten text on the left side, possibly a name or title, including "Book" and "Machos".

Handwritten notes in the upper middle section, including a date "10/10/10" and some illegible text.

Handwritten text in the middle section, possibly a name or title.

Handwritten notes in the middle section, including a date "10/10/10" and a phone number "0336-5401520".

Handwritten notes in the lower middle section, including a date "27/02 2018" and a date "3/4/2010".

Handwritten notes in the lower middle section, including a date "10/10/10" and some illegible text.

Handwritten text on the right side, including a date "10/10/10" and some illegible text.

Handwritten notes in the lower section, including a date "10/10/10" and some illegible text.

Handwritten notes at the bottom of the page, including a circled number "31" and the text "Annex-3".

32

صوبہ گجرات، ضلع بہار، تحصیل بہار -
تعلقہ بہار، تحصیل بہار

3. نام تعلقہ عنوان - ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ
درتہ، ساکھ دادہ، ساکھ دادہ

05-03-18

4. نام تعلقہ عنوان - ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ
درتہ، ساکھ دادہ، ساکھ دادہ

کیڈر، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ
صوبہ گجرات، ضلع بہار، تحصیل بہار

04/03/2018

صوبہ گجرات، ضلع بہار، تحصیل بہار
ظہیر خان

گجرات
گجرات، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ، ساکھ دادہ
صوبہ گجرات، ضلع بہار، تحصیل بہار

Attested
Deel

04/03/2018

صوبہ گجرات، ضلع بہار، تحصیل بہار
ظہیر خان

SPP for the state present. Petitioner present.

Petitioner namely Zameer son of Karam R/O Langriyal, Tehsil and District, Haripur seeks for return of amount of Rs: 45010/- and mobile Nokia 6303 along with sim card which were taken into possession in case FIR No: 120 dated 27.02.2018 U/S ¼ EHO PS KTS, District Haripur.

Perusal of the available record reveals that an amount of RS: 45010/- and mobile phone have been taken into possession in the above cited case vides recovery memo dated 27.02.2018 from personal search of the petitioner. Case file reveals that case is already disposed off on the basis of plead guilty. There is no rival claimant and also the alleged amount and mobile phone etc are no more required to the local police for further investigation. Investigation in the present case totally complete. It will serve no useful purpose if the amount and mobile phone etc are lying in the police station.

In view of the above, instant application is accepted and the amount of RS: 45010/- and mobile phone be returned to the present petitioner.

Requisitioned record be returned to the concerned quarter whereas this file be consigned to the record room after proper compilation and completion.



Shahid Mehmood
SHAHID MEHMOOD
Judicial Magistrate-I, Haripur

07/03/14

Alfred
Dad.

Almond
Boer

mm ps. 18-18
8-3-18

Almond
Boer

Handwritten notes in Urdu script, including the number 1370 and the word 'Almond'.

1370

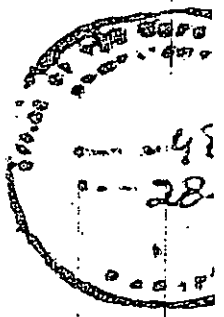
Almond

Almond

1370

کے لیے اس قدر شدت سے دکھانا چاہیے کہ اس کے
 من مانیوں کو نظر میں نہ لیا جائے اور عمارت کے
 باقی حصے کو محفوظ رکھنا چاہیے۔ اس کے ساتھ ساتھ
 کاموں پر اس پر بھی دیکھنا چاہیے۔ اس کے لیے
 فون سے رابطہ کرنا چاہیے اور اس کے لیے
 پولیس کے ہمراہ اس کے لیے اس کے لیے اس کے لیے
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Attested
 Deel

26

دو قلمی است و اینها در قیاس

عبارت (مستطیل) است که در این شکل
نمودار شده است.

3740-73

3740-73

در این شکل نشان داده شده است که
این دو قلمی در یک خط قرار می‌گیرند.



033293452

RTS 17115

در این شکل نشان داده شده است که
این دو قلمی در یک خط قرار می‌گیرند.
این دو قلمی در یک خط قرار می‌گیرند.
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این دو قلمی در یک خط قرار می‌گیرند.
این دو قلمی در یک خط قرار می‌گیرند.

RTS 17115
3-18

Allotted
Deal.

Annex

37

صلی اللہ علیہ وسلم

(12) عدلیہ کاؤنٹر میں اس کی تصدیق 15/12/18 کو کی گئی۔
 12/18 کی تصدیق 15/12/18 کو کی گئی۔
 عدلیہ کاؤنٹر میں اس کی تصدیق 15/12/18 کو کی گئی۔
 عدلیہ کاؤنٹر میں اس کی تصدیق 15/12/18 کو کی گئی۔

ضابطہ عالی
 نیشنل ایجنسی
 mm

Saddan

02-03-2018

Allected
 Bad.

والا طاویر ان اسلیر سڈ 18 2005 30 سے 4053 میں مع اعلان کے دیوے 8 سالہ آرگٹ 2760 سے 2767 تا

ظاہر سے اور یہ ہو کر موروثی میں گھنٹے کی حرکت میں سکلر میل آئے ایسی دوران خدمت علیہ 257/19

میں 302 R تا 305 عام کی لیس کی 302 تا 305 P میں اکرل کے درجے میں دسترس ہوئی مگر رور کا پور لائے

تا 305 D سے لیکر 305 VDA کے 305 P میں پوری ہدایت کے مختلف امور اراہن

تا اور ان کا وہ پانچ لاکھ روپیہ میں دیکھا ثابت ہوئے یہ خدمت دوران اسلیر اور پور لائے جو رور سے

پانچ لاکھ روپیہ ملانے اور یہ پور لائے کے پانچ لاکھ روپیہ اور اسلیر کے پانچ لاکھ روپیہ اور اسلیر

کے رہنے لائے اور وہ پانچ لاکھ روپیہ کے پانچ لاکھ روپیہ اور اسلیر کے پانچ لاکھ روپیہ اور اسلیر

کی ضرورت ہے 305 P اور 305 VDA کے پانچ لاکھ روپیہ اور اسلیر کے پانچ لاکھ روپیہ اور اسلیر

کی اطلاع جو اچھے 305 P اور 305 VDA کے پانچ لاکھ روپیہ اور اسلیر کے پانچ لاکھ روپیہ اور اسلیر

کی اطلاع اور وہ پانچ لاکھ روپیہ کے پانچ لاکھ روپیہ اور اسلیر کے پانچ لاکھ روپیہ اور اسلیر

کی اطلاع اور وہ پانچ لاکھ روپیہ کے پانچ لاکھ روپیہ اور اسلیر کے پانچ لاکھ روپیہ اور اسلیر

محمد رفیق

خلاصہ رپورٹ

تاریخ و وقت

نام اطلاع دہندہ

پورٹ انارڈر نامی جاوہر بھوان انڈیا پورٹ

پورٹ بمبئی انڈیا پورٹ

پورٹ بمبئی انڈیا پورٹ

پورٹ بمبئی انڈیا پورٹ

پورٹ بمبئی انڈیا پورٹ

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پورٹ بمبئی انڈیا پورٹ

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 7. $\frac{4}{6} \times \frac{1}{2} = \frac{4}{12} = \frac{1}{3}$
 8. $\frac{6}{7} \times \frac{3}{8} = \frac{18}{56} = \frac{9}{28}$
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 10. $\frac{3}{4} \times \frac{5}{12} = \frac{15}{48} = \frac{5}{16}$
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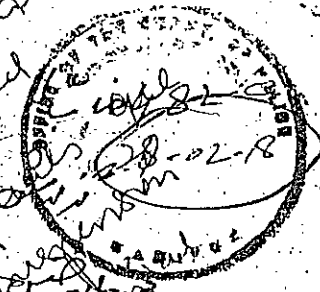
may be registered under the law

(41) (25)

Anwar-7

SADAR CHARIBOR

Sadda



Main body of handwritten Urdu text, including a date '27-2-08' and various names and amounts.

Handwritten signatures and dates at the bottom of the page.

Alsted
Dad

ابتدائی اطلاعی رپورٹ

مدعی 9-48-2023-105

ابتدائی اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 153 مجموعہ ضابطہ نو چوہدری

334-5394492

QTS

تھانہ

تھری کچور

منطقہ

علاقہ 127

نمبر

تاریخ 27/8 وقت جتن بجے

1	تاریخ وقت رپورٹ 28/8 وقت رفته تمام
2	نام و سکونت اطلاع دہندہ مستفیض محمد نواز خان ولد کریم دار سکونت سنگھ پور مال ایسٹ آباد حال ہی میں سفید آبار ٹیپ بری کر
3	مختصر کیفیت جرم (مورد فعد) حال اگر کچھ لیا گیا ہو۔
4	جائے وقوع فاصلہ تھانہ سے اور سمت چوٹی بجیہ بلا تینوں جانب
5	نام و سکونت ملزم شرقی بھانہ 1/2 کھوپڑی از فغانہ
6	کاوالی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا تو وہ جیلین کو
7	تھانہ سے روانگی کی تاریخ وقت

دہشت منصفیت مندرجہ بالا صورتوں کی اطلاع نیچے درج کرو۔ کو وقت 27 بجے تھری کچور کی دعوایت کے توسط سے اور ایسا بلا
 کچھ کل مورخہ 27/8 کو کو وقت جتن بجے من مسائل مع مظلوم حسین ولد محمد صادق سندھ علی صاحب آباد غازی آباد
 جی ہاؤسنگ کالونی سٹریٹ 27/8 کو کو وقت جتن بجے من مسائل مع مظلوم حسین ولد محمد صادق سندھ علی صاحب آباد غازی آباد
 میں سے پڑا لہذا اور فوجی ڈراڈ دھکا دینے میں لڑھکی رہی رقم منگواؤ در نہ تم پر کھاری حسدات کا نام پھر دے دے
 اور چوٹی بجیہ بلا تینوں جانب اس کے آڑ میں رقم کا بندہ نسبت رک مظلوم حسین ولد محمد صادق سندھ علی صاحب آباد غازی آباد
 میں آئے وہاں پر محمد نواز خان کو پولیس ایگروان با برخان نوالہ اور سندھ علی صاحب آباد کے ساتھ سفید برسات میں تھے
 جس کے پاس سے پولیس نے اور وہ سفید برساتی ڈراڈ دھکا (اور فوجی میں تھلا ڈر لٹھا اور حسین صاحب میں دکھا کر لٹھا
 کر دو کوٹن ایگروان نام سے رقم مبلغ 60000 روپے کا سٹاپ کر لیا نہ دینے کی صورت میں ہمیں خوف والا ہلاک اس پر
 کھاری سفید آبار میں پیرس ڈال دینگے جو میں اگلے صبح اور ڈرانے پر ایکی صحت سہاجت (بنا سا بوجھری صحت سہاجت
 کرنے پر سہارے ساتھ معاملات طے کرنا شروع ہوئے اور میں دو کوٹن ایگروان کا جسم ڈراڈ اور فوجی میں تھلا ڈر لٹھا اور وہ
 مبلغ 5000 روپے دہشت مظلوم حسین ندیم خان کو دینے نام کو والد اور جو پاس ہی کھٹا مٹا گیا تھا۔ دو تین گھنٹوں
 کا پھر چہرہ دنگے چول اسکا جہان کر دینگے رقم بکروہ سفید برساتی کو فغانہ کے لئے اور اگلے دن صبح میں فغانہ کے آگے آگے
 میرا روٹم خان کے چاریانہ روٹیا جانی اور روٹیا جانی خوف میں تھلا ڈر لٹھا اور وہ پولیس سٹیشن نوالہ دار
 دینگے تو پھر چہرہ دنگے چول اسکا جہان کر دینگے 80 روٹیاں کا پھر چہرہ دنگے چول اسکا جہان کر دینگے 80 روٹیاں کا
 پھر ایگروان کے ڈاڈ دھکا (میں تحفظ دیا گیا اور ان دنوں محمد نواز خان ولد کریم دار خان سندھ علی صاحب آباد حال ہی میں سفید آبار
 کی آٹھ بجی کالونی میں ایگروان کے ساتھ 28/8 کا وہ آئی خان آمدہ تھری کچور کی دعوایت کے مظلوم سے سر دہشت صورت (بنا بلا
 کی رائی جاتی ہے مفہم دہشت و مہر کوڑ قتل 27/8 کو کو وقت جتن بجے من مسائل مع مظلوم حسین ولد محمد صادق سندھ علی صاحب آباد غازی آباد

Faisal Haque 3
 ASHO-PS-ICTS
 01-3-18

Arrested
 Dad

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In the matter of
Appeal No. 852/2018

Nadeem Shahzad.....V/S.....PPO/IGP KPK & Others
(Appellant) (Respondents)

REJOINDER ON BEHALF OF THE APPELLANT

Respectfully Sheweth:

The appellant submits his rejoinder as under:-

Preliminary Objections:

1. Contents incorrect and misleading; the appellant has filed instant appeal according to procedure prescribed by law and rules governing the terms and conditions of appellant's service thus maintainable.
2. Contents incorrect and misleading, no rule of estoppel is applicable in the instant case.
3. Contents incorrect and misleading; the appellant has been awarded the penalty in violation of rules and regulations, thus instant appeal has been filed in according to law with clean hands.
4. Contents incorrect and misleading, all necessary material facts have been brought on the instant appeal for having just and proper decision on merits of this Honourable Tribunal.
5. Contents incorrect and misleading, all necessary parties required for just and proper decision of the case have been arrayed in the instant appeal.
6. Contents incorrect and misleading; the appellant has filed instant appeal according period prescribed by law and department rules is therefore well within time.
7. Contents incorrect and misleading; the appellant has been awarded the penalty by respondents against the rules and regulations. Thus instant appeal has been filed. The question of pressurizing the respondents does not arise.
8. Contents incorrect and misleading; bother the orders i.e. original as well as appellate are illegal and against the departmental rules and regulations for which the instant

appeal has been filed so that grievance could be settled from this Honourable Tribunal.

ON FACTS:



Contents of para No.1 to 16 of the appeal are correct and the reply submitted to these paras by respondents in para-1 to 16 is incorrect and misleading hence denied. In defense Statement of Complainant and a copy of FIR registered against him are attached "A & B" herewith.

GROUND:

All the grounds "A" to "F" taken in the memo of appeal are legal and will be substantiated at the time of hearing of appeal and reply submitted to these paras by respondents from "A" to "F" is incorrect and misleading hence vehemently denied.

It is, therefore, humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

THROUGH


APPELLANT

(MOHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
AT HARIPUR

Dated: 17-06-2019

AFFIDAVIT:

I, Nadeem Shahzad S/O Mohammad Afzal Khan appellant do hereby solemnly declare that contents of this rejoinder as well as that of titled appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Dated: 17-06-2019




Deponent/Appellant

30.07.2018

Statement of Mumraiz Khan s/o Karam Dad (complainant) r/o Langrail, Tehsil & District Abbottabad presently at in Mohallah Saced Abad, TIP, Haripur on oath.

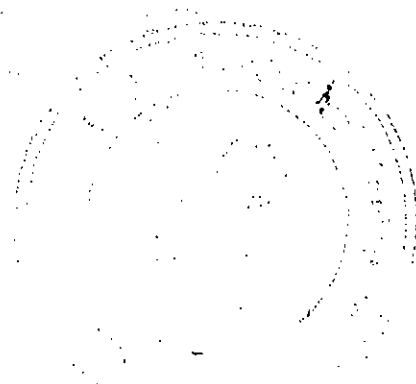
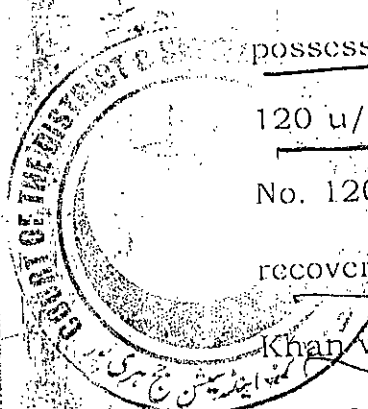
Stated that a complaint, FIR No: 127 dated 01.03.2018 U/S 382/506/342/34 PS KTS, Haripur was lodged by me against the accused namely Babar Mukhtiar and Nadeem Shahzad with pretix of receving the amount Rs: 45,000/-, however, later on we were satisfied that the same amount which was recovered from the possession of my real brother Zamir Khan in other case FIR No. 120 u/s % EHO PS KTS. Where these accused were I.O of the FIR No. 120 and the same said amount was properly mentioned in the recovery memo of the case in which my brother namely Zamir Khan was the accused and during his personal search amount Rs. 45000/- was recovered from his possession and same amount has been received by my real brother on supardari from honourable court. It is therefore, requested that the matter between me and accused has been satisfied, cleared and the same amount properly been justified by the accused while mentioning the same in the recovery memo, therefore, if honorable court acquists the accused, I have got no objection. It is further added that that the instant case was based on suspesicion, therefore, accused satisfied us the innocence of their guilt. Copy of my CNIC is Ex.PA.

Mumraiz Khan (complainant)
37405-7302048-9

RO& AC
30.07.2018

11 JUN 2018

SHAHID MEHMOOD
Judicial Magistrate-I,
Haripur



08/10/2021
03

فائل نمبر 043

ابتدائی اطلاعی رپورٹ راجہ دلی

8325541-616
5-247A77-0382

ابتدائی اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 152 مجموعہ ضابطہ نو جداری

تھانہ	سٹی	ضلع	صوبی پور
نمبر	علاقت نمبر	تاریخ	21 ⁰⁵ / ₁₉ وقت بعد عصر
1	تاریخ وقت رپورٹ	22 ⁵ / ₁₉ وقت	09:00 بجے
2	نام و سکونت اطلاع دہندہ مستغنیث	داؤد خان ولد محمد اکرم قوم اٹھوان سکنتہ قلعہ امین آباد TIP	
3	مختصر کیفیت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔	زیر دفعہ	PR 365
4	جائے وقوعہ فاصلہ تھانہ سے اور دست نبرد خانہ عدلی واقع قلعہ امین آباد TIP خانہ صوبہ نفاذہ 1/4 کلو میٹر اڑھانہ		
5	نام و سکونت ملزم		
6	کاروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	عدلی کمی تھریوری درخواست پر مقدمہ قائم خوا۔	
7	تھانہ سے روانگی کی تاریخ و وقت	روٹین ڈرائی	

ابتدائی اطلاع نیچے درج کرو۔ کوقت صدر تھریوری درخواست مستغنیث
مقدمہ خانہ نمبر 2 بالا ایسولٹ سعید شاہ Asi اعلیٰ راجہ دلی TIP نسبت کسٹل سعید انڈر 737 صوبہ پولیس پشاور
نمبر عدلیہ خیابان راجہ صاحب جوگی TIP خیابان ملکی بند پور درخواست گزارین سعیدہ میں آئین آباد کاروانی ہیں
اور TIP کالونی میں ہیں اور سعیدہ واقعی بھائی فاروق پوری 1/4 سال سیموسہ چارٹ کی دکان کرتے ہیں
یکل گذشتہ صوفیہ 21⁰⁵/₁₉ کو برادرم اضطراری کے فوراً بعد پورے نزدیکی سعیدہ کو نماز عذرت کی آدھنی کھینے کے
سے روانہ خوا۔ جو رات گئے تک والی نہ آیا۔ چکا خواہاں میں فون بھی بند مل رہا ہے۔ جو ناوقت ہوئے برادرم
کی تلاش میں معلومات گرد و نواح عزیز واقارب میں کھینے۔ جو مذکورہ کا پتہ نہیں چل رہا ہے۔ ہماری
میں کے ساتھ دشمنی یا عداوت نہ ہے۔ اور نہ ہی سرپرست کسی برکوتی سٹل سعیدہ ہے۔ معلومات ملنے میں
وقت برادری کے بعد سعیدہ تک نہ ملنے پر مجھے ملنے یقین دہانی ہو چکی ہے۔ کہ برادرم خود فاروق کوگی
شخص یا شخصوں نے نامعلوم وجوہات سے اغوا کر لیا ہے۔ میں اپنے بھائی کو اغوا کر کے کا مذکورہ
مذکورہ نامعلوم شخصوں سے برکوتی درخواست سعیدہ سعیدہ خانوتی کاروائی عمل میں لایا جا کر عدلیہ
اعداد فرمائیں جائے۔ احتیاطاً انگریزی داؤد خان ولد محمد اکرم قوم اٹھوان سکنتہ قلعہ امین آباد TIP 22⁵/₁₉ درخواست
پر سعیدہ شاہ Asi جوگی TIP نے ذیل حکم سیر کیا۔ خیابان ملکی سعیدہ درخواست واپس سے سرپرست سعیدہ جرم 365
PR کی پوری چابی ہے درخواست بدست کسٹل سعیدہ انڈر 737 ارسال نفاذ ہے۔ مقدمہ عدلیہ راجہ صاحب کے تفتیش حوالہ
152 اسٹاف کیا جائے دستخط انگریزی سعیدہ شاہ Asi جوگی TIP 22⁵/₁₉ کاروائی تھانہ آدھ تھریوری درخواست
پر حسب تھریوری اسٹاف سعیدہ جرم بالاکا نام جوگی نقل پورے جوگی راجہ صاحب کے تفتیش حوالہ
152 اسٹاف کیا جاتا ہے۔ ہر روز گزار رہا ہے۔



راز خان

ہریپور، پولیس کی کامیاب کارروائی مغوی بازیاب، ملزمان گرفتار

اغواء کاروں نے چودہ لاکھ کا تاوان طلب کیا تھا، مقدمہ درج

کلگان (نمائندہ شمال) ہریپور پولیس کی کامیاب برآمد اغوا کاروں کے خلاف مقدمہ درج کر لیا عوام کا کارروائی اغوا کے ملزمان بارہ گھنٹوں میں گرفتار مغوی پولیس چوکی انچارج (باقی صفحہ 6 بقیہ نمبر 32)

تفتیش

بقیہ 32

سعید شاہ اور ان کی ٹیم کو خراج حسین ہری پور پولیس ذرائع کے مطابق محمد داد ولد محمد اکرم ساکن امین آباد نے رات ایک بجے پولیس چوکی میں رپورٹ درج کروائی کہ ان کے بھائی محمد فاروق ولد محمد اکرم ساکن امین آباد جو کہ وقت افطار سے گم شدہ تھے جن کو ہم نے اپنی مدد آپ کے تحت بہت تلاش کیا لیکن کوئی سراغ نہیں مل سکا بعد ازاں ہمیں ایک نمبر سے کال آئی اور ہمیں اطلاع دی گئی کہ ہمارے بھائی کو اغوا کیا گیا ہے اغوا کاروں نے 14 لاکھ روپے تاوان طلب کیا ہم مدعی کی درخواست پر پولیس نے کارروائی کرتے ہوئے تحقیقات کا آغاز کیا اور صرف بارہ گھنٹوں کی کامیاب کوشش کے بعد مغوی کو بازیاب کروا لیا گیا اور ملزمان کو گرفتار کر لیا گیا پولیس ذرائع کے مطابق ملزمان کے خلاف دفعہ 365 کے تحت مقدمہ درج کر لیا ہے اور گرفتار ملزمان سے تفتیش جاری ہے اہلیان علاقہ بے پولیس چوکی کے انچارج سعید شاہ اور دیگر عملہ کو خراج حسین پیش کیا۔



ہری پور مغوی محمد فاروق جبکہ دوسری جانب اغوا کار پولیس حراست میں۔

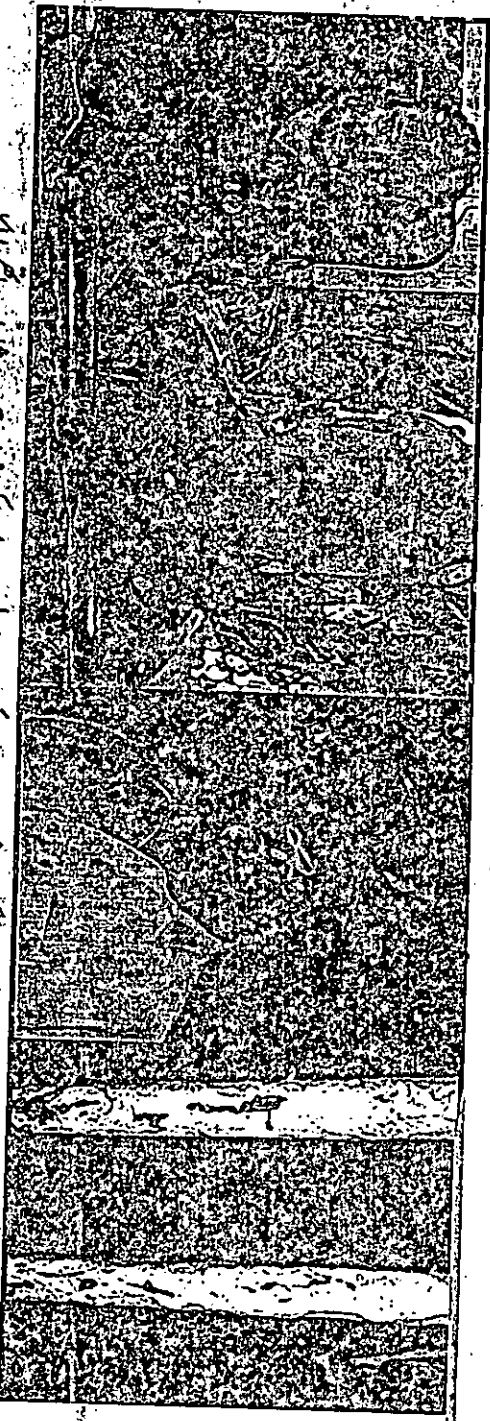
پولیس کی کامیاب کارروائی، شاہ کی اجازت سے شہر کی گلیوں میں

انگواء کے ملزمان محض 12 گھنٹوں میں گرفتار

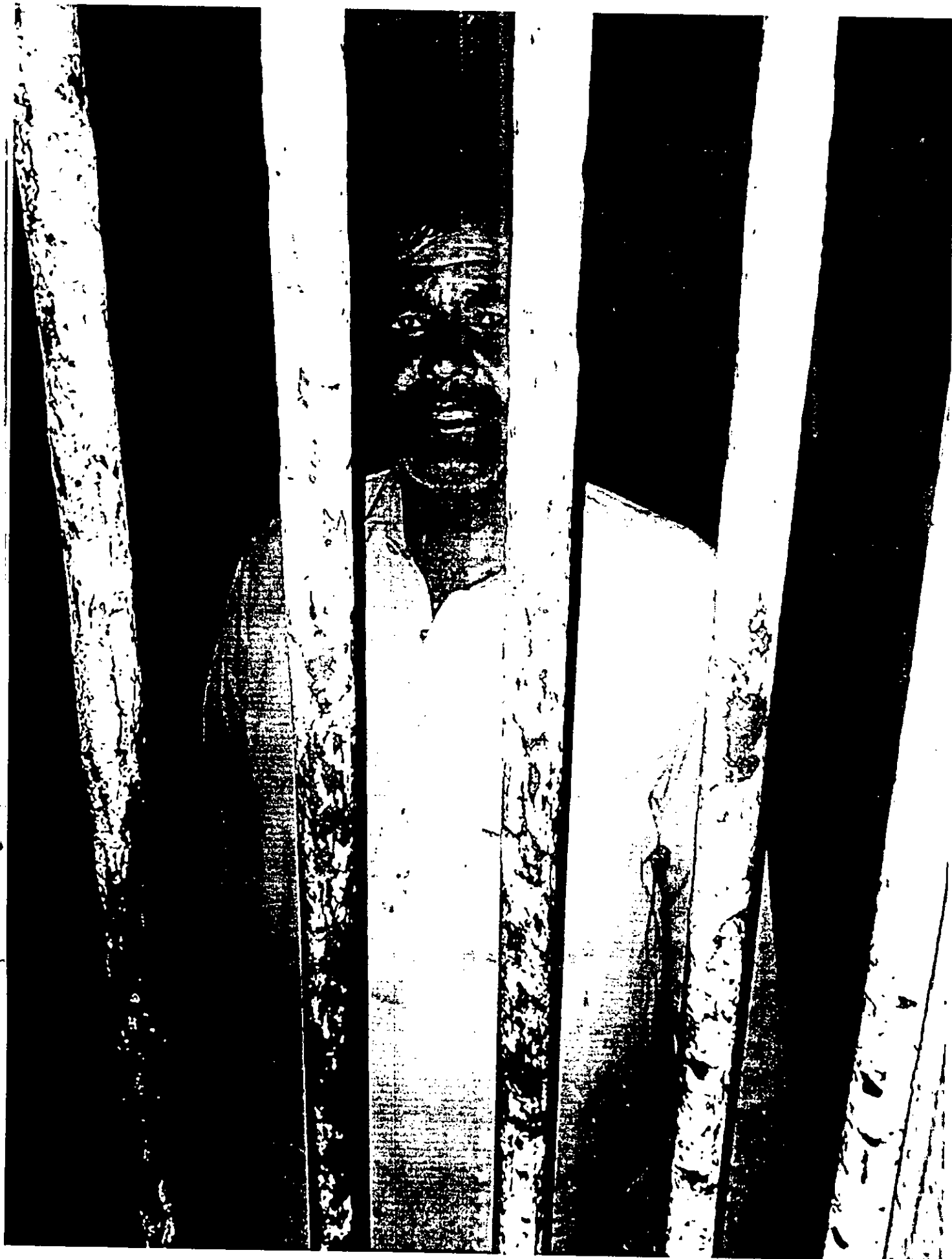
ہر کاروبار کو باخبر کرنا اور وقت انظار سے کم ہونے سے

انگوا کارروائی نے 14 لاکھ روپے تاوان طلب کیا، پولیس نے مقدمہ درج کر لیا

ہری پور (جینے جہاں رپورٹ اسکران انومان سے) آئی اور ہمیں اطلاع دی گئی کہ ہمارے بھائی کو انگوا کیا گیا ہے، انگوا کارروائی نے 14 لاکھ روپے تاوان طلب کیا ہے مدعی کی درخواست پر پولیس نے کارروائی کرتے ہوئے تحقیقات کا آغاز کیا اور محض 12 گھنٹوں کی کامیاب کوشش کے بعد دعویٰ کو بازیاب کر لیا گیا اور ملزمان کو گرفتار کر لیا گیا، پولیس نے ملزمان کے مطابق ضمانت کے خلاف دفعہ 365 کے تحت مقدمہ درج کر لیا ہے اور گرفتار ملزمان سے تفتیش جاری ہے، اہلیان مظاہر نے پولیس چوکی کے اجازت سے شہر اور دیگر کرائز میں تفتیش کوئی سرانجام نہیں مل سکا بعد ازاں ہمیں ایک خبر سے کال

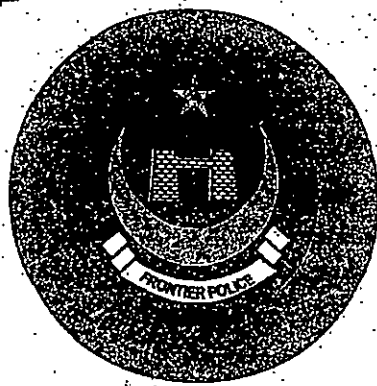


ہری پور: انگوا نے والا محلہ فاروق، گرفتار انگوا کارروائی میں حصہ لنے والے چوکی اجازت سے شہر اور شاہ کی گلیوں میں



North West Frontier Province Police

43



Commendation Certificate
CLASS III

Granted by

Atiq Ulla Khan Wazir, DPO Haripur.
DISTRICT POLICE OFFICER, HARIPUR

To Const: Nadeem Shahzad no. 525

Sub-Of: _____ Entry made
District Haripur in the Sec
Roll.

in Recognition of

For his good performance in arresting the Doori
PO2 Niaz vide case FIR no. 187 dated 24.5.07
u/s 302/109 PPC ps KIS
with cash reward of Rs-300/-
OB no. 425

Dated 6-10-07 20

DISTRICT POLICE OFFICER
HARIPUR
District Police Officer
Haripur

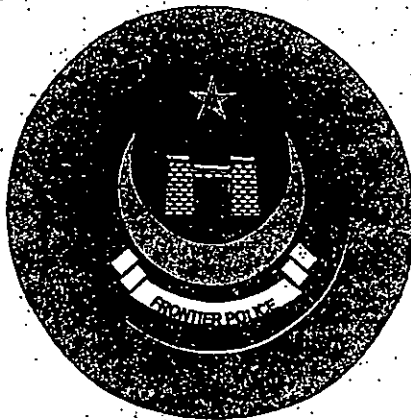
[Handwritten signature]

Charge Sheet
Police Officer Haripur. (Copy
dated 05-03-2018 and Stateme
attached as "B").
Charr
appellant exp
r. 10-

(25)

44

North West Frontier Province Police



**Commendation Certificate
CLASS III**

Granted by

Ally Ulla Khan Wazir, DPO Haripur.
DISTRICT POLICE OFFICER, HARIPUR

To Const. Nadeem Shahzad no. 525

Sen Of _____

District Haripur

Entry made
in the Roll
Roll

in Recognition of

Axxh

For his good performance in case FIR No. S.R.
3392340 dated 4-10-07 u/s 13-A0 ps Kis
with cash reward of Rs-200/-

OB no. 421

Attested

Dated 6-10-07 20

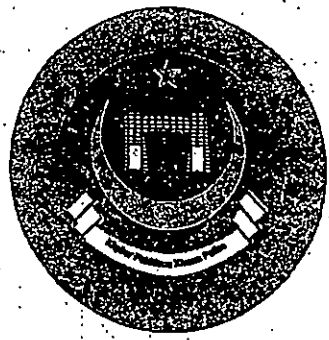
**DISTRICT POLICE OFFICER
HARIPUR**

District Police Officer
Haripur

36

45

Higher Makhtoon Khairana Police



Commendation Certificate
Class III
Granted by

Captain (R) Wahid Mahmood. (psp)
DISTRICT POLICE OFFICER HARIPUR

To FC Nadeem NO 525
Son of PS city
District Haripur

In Recognition of

For his excellent performance
NO 93, 94, 95 of 06.02.2014 of PS city
With cash reward Rs. 200/-

OB No. 56
Dated 27.02.2014

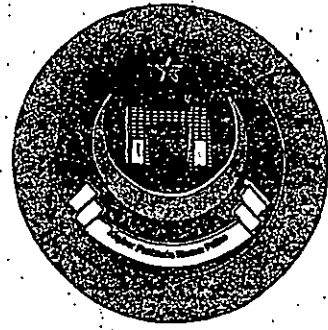
Attested

District Police Officer
Distt. Haripur
District Police Officer
Haripur

(30)

46

Higher Rankton Haripur Police



Commendation Certificate
Class III
Granted by

Captain R. Wahid Mahmood P.S.
DISTRICT POLICE OFFICER HARIPUR

To FC Mohammad Akdeem
Son of NO. 525 (B City)
District Haripur

In Recognition of

For his good performance in arrest
of Pos in case FIR no. 139/2013 U/L 334
FIR No:- 718/2013 B. Kot with cash reward
RS. 1000/-

OB No. 89
Dated 20-02-2014

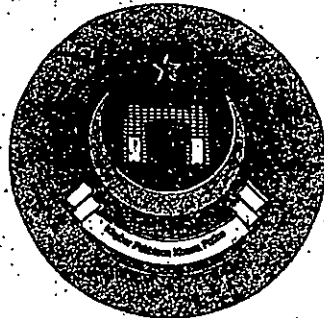
Handwritten signature

District Police Officer
Distt. Haripur
District Police Officer
Haripur

PS

(47)

Higher Rankton Haripur Police



Commendation Certificate
Class III
Granted by

Captain (S) Wahid Mehmood (PS)
DISTRICT POLICE OFFICER HARIPUR

To *FC Mohammad Nadeem no 525*

Son of *A. R. S. S. S.*

District *Haripur*

In Recognition of

*For his good performance in case
RIR No:- 172-173/2014 U/S 381-A Ps
City with Cash reward 2000/-*

OB No. *98*

Dated *24.2.2014*

*Allisted
Dad.*

[Signature]
District Police Officer
Distt. Haripur
District Police Officer
Haripur

79

48

KHYBER PUKHTUNKHWA POLICE



Commendation Certificate

CLASS II

Granted by

DEPUTY INSPECTOR GENERAL OF POLICE HAZARA RANGE
ABBOTTABAD

To FC NADEEM No. 525.

Son of Ps City

City made 1st
in Service Off.

District Haripur

In Recognition of

his good performance in case FIR No. 84/15

u/s 364-A PPC and 815/15 u/s 3RR/41/34 PPC Ps

City, with cash reward Rs= 500/-

No= 18995/A

Dated 20-11-2015

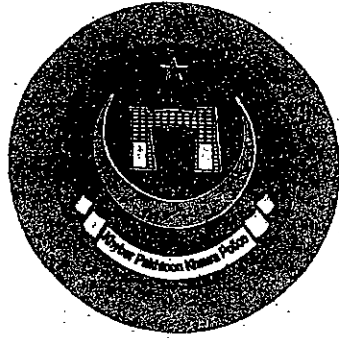
Attested
Deputy

[Signature]
Deputy Inspector General of Police,
Hazara Range Abbottabad.

40

49

Khuzdar Pakhtoon Khana Police



Commendation Certificate
Class III
Granted by

Muhammad Khurram Rashid (PSP)
DISTRICT POLICE OFFICER HARIPUR

To FC. Nadeem NO 525
Son of Enay azade 1st
District Haripur Benive (PW)

in Recognition of

For his commendable job in the arrest
of accused Mehirban involved in case FIR NO
75/15 UPS 307/304/109 PPC PS city. With cash reward
RS 500/-

OB No..756.....

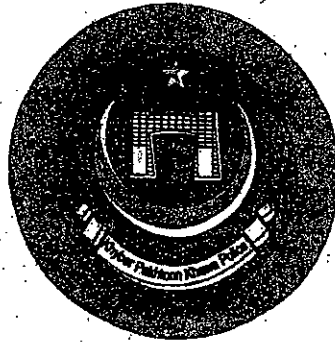
Dated..14..12..2015

Attested
Deed.

[Signature]
District Police Officer
District Haripur Office
Haripur

Shaher Bakhtoon Khama Police

50



Commendation Certificate
Class III
Granted by

Muhammad Khurram Rashid (P.S.P)
DISTRICT POLICE OFFICER HARIPUR

To FC Nadeem Shehzad No: 525
Son of Anti Heinous crime cell
District Hari pur

Engr. M. A. Iqbal
Gen Secy

in Recognition of

For his good performance arresting the
accused in Case F.I.R No1 290 dated 28-02-16
U/S 382, 109, 34 PC, PS city -

OB No. 238
Dated 11-04-2016

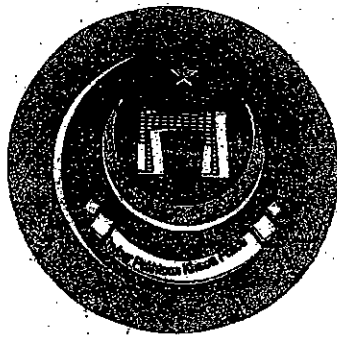
Attested
Dad

M. A. Iqbal
District Police Officer
District Haripur

(75)

(51)

Khair Pakhtoon Khana Police



Commendation Certificate
Class III
Granted by

Syed Shehzad Nadeem Bukhari (P.S.D)
DISTRICT POLICE OFFICER HARIPUR

To PC Nadeem No: 528

Son of _____ Entry made in
District Haripur the Service Bill

in Recognition of

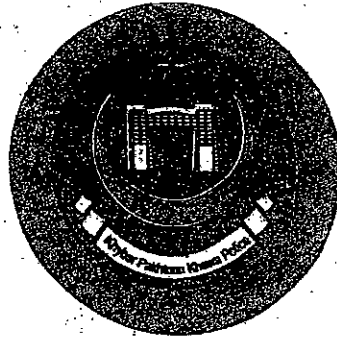
For trace and arrest of accused
in Case F.I-R no: 937 Dated 23-10-2016
UP 302 PPC PS City with Cash reward
Rs: 2000/-

OB No...754.....
Dated...07/12/2016

*Alleged
Dad*

[Signature]
District Police Officer
Dist: Haripur

52
Abdool Bakhtoon Khana Police



Commendation Certificate
Class III
Granted by

Syed Shahzad Nadeem Bukhari (PSP)

DISTRICT POLICE OFFICER HARIPUR

To FC Nadeem NO 525

Son of DSB

District Haripur

In Recognition of

For his good performance arrest of accused Pervaiz s/o
Nawaz s/o Chantiry in case FIR NO 63 DT 24.4.2017
U/S 399-400-401 PPC PS Beer. With cash reward RS 2000/-

OB No. 364.....

Dated. 09.5.2017

Attested
DASH

District Police Officer
Distt. Haripur

135
Abdur Wahid Khan
593
Police



Commendation Certificate
Class III
Granted by

Syed Khalid Hamdani (ASP, QPM)
DISTRICT POLICE OFFICER HARIPUR
To FC Nadeem No 525
Son of DSB
District Haripur

in Recognition of
for his outstanding performance
in Official duty.

OB No. 134
Dated 27-02-2018

District Police Officer
Dist. Haripur

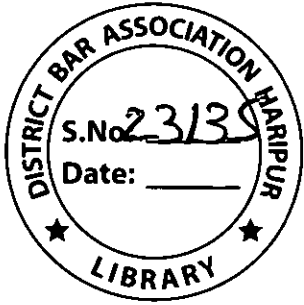
Attested
Dist.

DBA No: 207
 BC No:

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 Name of Advocate: محوالم تنوی

S.No: 23135



وکالت نامہ

بعد الت: ضابطہ کتبہ لکھنؤ گواہ سرسید سٹیٹ لائبریری اور
 عنوان: ندیم سہزاد
 منجانب: اسٹینڈ
 نام: RPK
 نوعیت مقدمہ: سرسید سٹیٹ لائبریری
 باعث تحریر آئیکہ:

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی وجود ہی برائے پیشی یا تصدیقہ مقدمہ بمقام اسٹینڈ لکھنؤ کے لیے

کو حسب ذیل شرائط پروکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس کے ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیر و نجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختانہ بیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

Accepted for M. Aslam

2018 | 07 | 02 مورخہ دن | ماہ | سال

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ندیم سہزاد اسٹینڈ

①

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE
TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD**

SERVICE APPEAL NO.852/2018

Nadeem Shahzad S/O Muhammad Afzal Khan (Ex-Constable NO.525 District Police
Haripur) R/O Village Jamia Utman, Tehsil and District Haripur.

.....(Appellant)

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar, and another.

.....(Respondents)

RESPECTFULLY SHEWETH!

The para-wise comments on behalf of respondent No.1, 2 and 3 are submitted as under:-

PRELIMINARY OBJECTIONS:-

1. That the instant Service Appeal is not maintainable in the present form.
2. That the appellant is estopped by his own conduct.
3. That the appellant has not come to the Hon'ble Tribunal with clean hands.
4. That the appellant has suppressed material facts from the Hon'ble Tribunal.
5. That the instant Service Appeal is not maintainable for non-joinder/ mis-joinder of necessary parties.
6. That the instant Service Appeal is badly time barred.
7. That the appellant has filed the instant service appeal just to pressurize the respondents.
8. That the both orders passed by the authorities, are as per law and rules after fulfilling all the codal formalities, hence, the appeal is liable to be dismissed without any further proceeding.

OBJECTIONS ON FACTS:-

1. In reply to this Para, it is submitted that the appellant Ex-Constable Nadeem Shahzad No.525, while posted at PS KTS Haripur, along with co-accused Head Constable Babar Mukhtiar No.206, in plain clothes, showed criminal force and lifted a citizen namely, Zameer Khan S/o Kareem Dad, presently r/o Chungi No.11, TIP at GT road near Paris Hotel Haripur, and took him at the jurisdiction of Police Station KTS, where the appellant along with co-accused demanded Rs.60000 from the said person and threaten him to implicate him in a heinous narcotic case, if he failed to pay the same amount. After, bargain the appellant and co-accused obtained Rs.45000 and registered case FIR No. 120 dated 27.02.2018, U/s 3/4 PS KTS, against Zameer Khan.

The matter was complained by Mumraiz Khan, the real brother of Zameer Khan, in his application he narrated the facts, the above mentioned acts / omissions of the appellant were offense as well as misconduct under the law, consequently, case FIR No.127 dated 01.03.2018, u/s 382/342/506/34 PPC PS KTS, was registered against the appellant and co-accused Head Constable Babar Mukhtiar No.206. The appellant was proceeded against departmentally. Therefore, he was served with

- charge sheet and statements of allegations, vide this office Endst: No.37-39/PA dated 05.03.2018. SP Investigation Haripur, Mr. Shams UR Rehman was appointed as enquiry officer, who conducted proper departmental enquiry and submitted his findings, vide his office Memo No.812/PA Inv, dated 22.05.2018, in which the enquiry officer held the appellant guilty of gross misconduct, therefore, he was served with final show cause notice, to which the appellant could not give satisfactory reply. Thereafter, the appellant was called in orderly room and was heard in person, by the then District Police Officer, Haripur, and being found guilty of gross misconduct, the appellant was awarded lawful major punishment of dismissal from service vide OB No.378 dated 30.05.2018, by the then District Police Officer, Haripur. (Copy of enquiry is attached as Annexure "A").
2. Incorrect, the appellant could not give satisfactory reply of charges leveled against him, moreover, he was found guilty of misconduct by the enquiry officer.
 3. In reply to this Para, it is submitted that after finalization of departmental enquiry, the appellant was issued final Show Cause Notice as per law.
 4. Incorrect, the appellant could not give plausible reply of the Show Cause Notice, and he was held responsible for illegal acts done by him in official capacity.
 5. Incorrect, the appellant earned bad name for police department, he exceeded his lawful authority, and implicated citizen in a criminal case with ulterior motives, and for wrongful gains. The enquiry officer collected evidence, which held the appellant guilty of gross misconduct, therefore, the appellant was awarded quite legal punishment.
 6. In reply to this Para, it is submitted that the appellant filed departmental appeal, against the punishment to the Regional Police Officer, Hazara Region, Abbottabad, which was rejected on quite legal reasons by the competent authority. (Copy of order is attached as Annexure "B").
 7. Incorrect, as stated above.
 8. Incorrect, the appellant deviated from lawful duties, his conduct was against the norm for Police force, and misconduct under the law.
 9. Incorrect, the appellant is generating false stories, the fact was probed through proper departmental enquiry, in which it was transpired that the appellant along with co-accused arrested Zameer Khan from the jurisdiction of Police Station City, and booked him in a criminal case in Police Station KTS, District Haripur, they did so for illegal financial benefits / gratification up to the tone of Rs.60,000 and through bargain the appellant along with co-accused obtained Rs.45,000.
 10. Incorrect, as stated in the preceding paras, moreover, the allegations of misconduct were probed, the appellants guilt was established beyond any doubt.
 11. Subject to proof, moreover, the court proceedings are not fact in issue, rather the appellant received illegal gratification and registered criminal case against the above mentioned citizen, the allegations were fully proved during the enquiry.
 12. Incorrect, the appellant was complained against by applicant Mumraiz Khan S/o Karam Dad Khan R/o Langrial District Abbottabad (presently r/o Mohallah Saeed Abad), the applicant narrated the facts regarding the occurrence, the appellant is using mischievous tactics to give the matter different color, the fact is that the appellant robbed a citizen and thereby induced him delivery of Rs. 45,000, on the ground that he would be implicated in Narcotic case, if he had failed to pay the same to the appellant and co-accused. The fact that the appellant committed an offence in police uniform is sufficient reason, which does not entitle him to serve in police.
 13. Incorrect, the appellant committed heinous offense in color of uniform, therefore, lawful action was taken, and criminal case vide FIR No.127 dated 01.03.2018, U/s 382/342/34PPC, Police Station, KTS, was registered against the accused police


official. Proper departmental enquiry was conducted, in which the witnesses gave their evidence, which proved the allegations leveled against the appellant, it was the fault of appellant himself, as he indulged in criminal activities. (3)


14. Incorrect, the appellant was complained against by a citizen, therefore, the appellant was issued charge Sheet and statement of allegation as per law.
15. Incorrect, the appellant does not possess excellent service record, rather he was awarded several punishments during his past service i.e. forfeiture of approved service, stoppage of increment, censure, etc.
16. Incorrect, the appellant was found guilty of gross misconduct, therefore, he was awarded quite legal punishment.

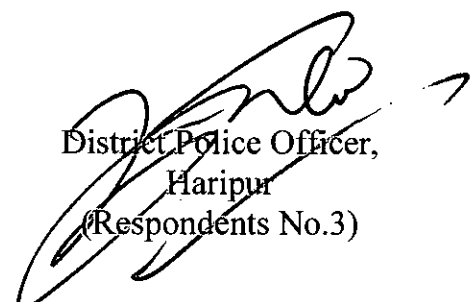
GROUND:-

- a. Incorrect, the order of punishment as well as order of appellate authority are quite legal, in accordance with law and maintainable.
- b. Incorrect, the respondent department proceeded as per law, natural justice and fairness, hence, the orders of punishment are lawful and maintainable.
- c. Incorrect, proper departmental enquiry was conducted, the appellant was given right of personal hearing and self defense, however, he failed to defend himself from liability.
- d. Incorrect, the enquiry officer collected sufficient evidence, which held the appellant guilty, Similarly, all legal requirements were fulfilled while passing the punishment to the appellant.
- e. Incorrect, the appellate authority observed the legal requirements, while deciding the departmental appeal of appellant, so, the appellate order is quite legal and maintainable.
- f. Incorrect, the appellant was found guilty of misconduct, therefore, he was awarded lawful punishment, which is maintainable in eye of law.

In view of above, it is therefore, most humbly prayed that the instant service appeal does not hold any legal force, which may graciously be dismissed.


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


Regional Police Officer,
Hazara Region,
Abbottabad
(Respondents No.2)


District Police Officer,
Haripur
(Respondents No.3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE

TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD

SERVICE APPEAL NO.523/2018

Babar Mukhtiar S/O Mukhtiar Ahmed EX IHC NO.296 District Police Haripur R/O
Village Khoe Kama, Tehsil Khanpur, District Haripur.

.....(Appellant)

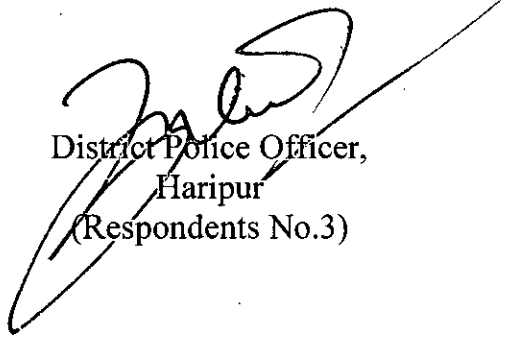
VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar, and another.

.....(Respondents)

COUNTER AFFIDAVIT

I, do hereby solemnly affirm and declare, that the contents of comments / reply, are true to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.


District Police Officer,
Haripur
(Respondents No.3)

ORDER

The following police officers/officials are hereby suspended due to their involvement in case FIR No. 127 dated 27.02.2018 u/s 382/342/506/34 PPC PS KTS with immediate effect and issue charge sheet.

5

1. HC Babar Mukhtiar No. 206
2. FC Nadeem Shehzad No. 525

District Police Officer
Haripur

OB NO 162
06-3-2018

گیلانی
جسوسی
پرو، جی 23

Control in their
office 2018

ORDER

6

Constable Nadeem Khan NO.525, while posted in PS KTS, Haripur, in plain clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem Dad Khan presently r/o Chungi No.11 TIP, near paris Hotel G,T road Haripur and took him at Chungi NO.02, KTS, and threaded him to register a false narcotics case, if he failed to give illegal gratification of Rs.60000/- through bargain he along with Head Constable Babar Mukhtiar No.206, extracted 45000/- from him, and also charged him in case FIR No.120 dated 27.02.2018, u/s 3/4 EHO, PS KTS, by doing illegal acts and omission in deviation of lawful duties, he implicated himself in criminal offence, vide case FIR No.127 dated 07.03.2018, u/s 382/342/506/34 PPC PS KTS, the acts and omissions of defaulter official were misconduct under Khyber Pakhtunkhwa, police efficiency and discipline rules 1975. therefore, He was served with statements of allegations containing charges of misconduct, vide this office Endst No.37-39/PA dated 05.03.2018.

To probe the allegations, Mr. Shams UR Rehman Superintendent of Police, Investigation, Haripur was appointed as enquiry officer, who conducted proper departmental enquiry and submitted his finding, vide his office Memo No.812/PA dated 22.05.2018. in which, he held the accused police official guilty, on receiving recommendation of enquiry officer, the accused official was served with final show cause notice, vide this office endst: NO.129-130 dated 23.05.2018 to which he submitted his reply which was not found satisfactory, so he was called in orderly room for personal hearing, the accused police official was given right of personal hearing and self defense.

Having gone through enquiry papers recommendation of enquiry officer and after personal hearing of accused Constable Nadeem Khan No.525, the charges of misconduct against the defaulter official stands proved, so, I am fully satisfied that Constable Nadeem Khan committed gross misconduct, therefore, I, Syed Khalid Mehmood Hamdani, District Police Officer, Haripur being competent authority under Khyber Pakhtunkhwa Police efficiency and discipline rules 1975, awarded major punishment of "Dismissal from service" with immediate effect.

Order announced.

OB No. 1375 dated 30-05-2018

Entered in his
Service Rde.

30-5-18

District Police Officer
Haripur

FINAL SHOW CAUSE NOTICE

7

I, *Syed Khalid Hamdani (PSP, QPM)*, District Police Officer, Haripur as Competent Authority under Police Rules 1975, do hereby serve Final Show Cause Notice upon you FC Nadeem No. 525 on the following grounds: -

"That you while posted at PS KTS you along with HC Baber Mukhtiar no.206 in plane clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem dad Khan presently r/o chunggi No.11 TIP near Paris Hotel G.T road Haripur and took him at Chungi No.2 KTS and threaded him to register a false narcotics case if he failed to give illegal gratification of Rs.60000, through bargain you alongwith Constable Nadeem extracted Rs.45000 from him and also charged him in case FIR No. 120 dated 27.03.2018 u/s 3/4 EHO PS KTS, you committed an offense vide FIR No.127 dated 27.03.2018, u/s 382,342,506/34PPC PS KTS, your involvement in heinous criminal case is gross misconduct on your part under Police E&D Rules 1975"

(1) For the purpose of scrutinizing the conduct on your part with reference to the above allegation, you was serve with Charge Sheet/Statement of allegation and Superintendent of Police, Investigation, Haripur was appointed as enquiry officer against you for the conduct of proper departmental enquiry vide this office Endst No. 37-39 dated 05.03.2018.

(2) The enquiry officer after conducting proper departmental enquiry submitted his finding vide his office letter No. 812 dated 22.05.2018, in which he had the charges of misconduct proved and recommended for minor punishment under section-4 of the KPK Police E&D Rules 1975.

(3) Keeping in view of above allegation on your part, you are hereby called upon. To Show Cause within (07) days of the removed of this Final Show Cause notice as to why you should not be awarded punishment under the Police Rule 1975, if your written reply is not received with in stipulated period. It shall be presumed, that you have no defense to affirm, you are also allowed to appear before the undersigned, if you so desired.

(Syed Khalid Hamdani) PSP, QPM
District Police Officer
Haripur

No. *129-30* / dated Haripur the *23* / *05* / 2018

Copy of above is submitted to the Regional Police Officer, Hazara Region Abbottabad please.

(Syed Khalid Hamdani)
District Police Officer
Haripur

From: The Superintendent of Police,
Investigation, Haripur

To: District Police officer,
Haripur.

No: 312 PA Dated/Inv 22/03/2018.

Subject: DEPARTMENTAL INQUIRY AGAINST FC NADEEM NO.525.

Kindly refer to your office No. 37-39/ PA dated 05/03/2018 through which the inquiry of Constable Nadeem No. 525, PS KTS was marked to the undersigned.

ALLEGATION:

That he while posted as FC at Police station KTS he along with IHC Babar Mukhtar in plain clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan S/O Kareem dad khan presently r/o Chungi No. 11 TIP near Paris Hotel G.T road Haripur and took him at Chungi No. 2 KTS and threaded him to register a false narcotics case if he failed to give illegal gratification of Rs. 60000/- through bargain you along with constable Nadeem extracted Rs. 45000/- from him and also charged him in case FIR No. 127 dated 27/03/2018 u/s 3/4 EHO PS KTS, you committed an offense vide FIR No. 127 dated 01/03/2018, u/s 382,342,506/34 PPC PS KTS, your involvement in heinous criminal case is gross misconduct under police efficiency and discipline Rules 1975, hence, charge sheeted.

FINDING:

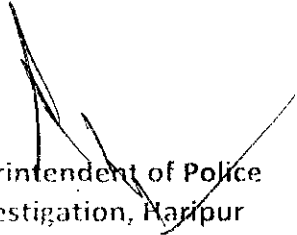
Having gone through the relevant record placed on the file, statements of complainant/witnesses and after affording the opportunity of hearing to the accused police officials the undersigned has come to the following conclusion:-

- ❖ The accused official has taken Mr. Zameer Khan S/O Kareem Dad resident of Chungi No. 11 TIP, Haripur from Paris Hotel G.T Road an area falls in Jurisdiction of Police Station City, Haripur to area of Police Station KTS and forcibly snatched Rupees. 45000/- from Zameer Khan, resultantly a case vide FIR No. 127 dated 27/03/2018, u/s 382,342,506/34 PPC PS KTS was registered against him.
- ❖ The accused police official has given money to Muharrar for entering as case property at a later stage and entry to such effect was made in register No. 19 after closure of initial entry made therein about the case. The statement of the then Moharrar Obaid Zaman is enclosed
- ❖ The accused official has blemish service record formerly being awarded dismissal from service and many other major punishments are recorded in his service roll.
- ❖ The recovery of "Churras" originally was approximately 10-15 grams which was increased to 480 grams by the accused police official.

FINDING:

As inquiry officer the undersigned has come to the outcome that allegations of taking money, tempering case property and evidence by accused police officer stand established and he is found guilty.

Keeping in view of above FC Nadeem Shezad No.525 is recommended for Major punishment under police efficiency and discipline Rules 1975.


Superintendent of Police
Investigation, Haripur

Encl:

To

The District Police Officer,
HaripurSUBJECT:- REPLY TO THE SHOW CAUSE NOTICE.

Respected Sir,

With most respect it is submitted that the Final Show Cause Notice issued vide No. 129-30 dated 23-05-2018 has been delivered to me. Earlier to this I was served upon with a Charge Sheet with the same allegation which had been replied in detail explaining all facts of the case. Nevertheless, the instant Final Show Cause Notice is replied as under:-

1. That on 27-02-2018, I alongwith IHC Babar Mukhtiar, Constable Akash No.728 and Constable Zahid No. 4696, in uniform, in a private vehicle was on routine mobile duty. At 1940 hours when present at Bypass Road near Choar Colony a suspected man was seen in the light of vehicle. He was stopped and searched and charas wrapped in polythene shopper was recovered from him. While weighing the same on the spot, it was found 480 grams. 05 grams charas was separated and two parcels, one for FSL and the other for rest of the charas, were prepared. On his bodily search a sum of Rs. 45010/- and one Nokhia Mobile Model No.6300 were also recovered. Recovery Memo and Murasila were drafted on the spot by IHC Babar Mukhtiar and sent to PS KTS for recording FIR.

2. That on 28-02-2018, a complete challan was submitted and the accused produced in custody before the Judicial Magistrate Haripur. Accused through his written application pleaded his guilt before the Judicial Magistrate, whereupon he was convicted and sentenced under Section 3 EHO to undergo 02 days SI and to pay the fine of Rs.500/-.

3. That 04-03-2018, after release from Jail the accused submitted application through his Counsel before the Judicial Magistrate Haripur for return of his recovered money of Rs. 45010/- and a Nokia Mobile Phone alongwith SIM No.0336-5401520 whereupon order dated 07-03-2018 was passed and the accused received his amount and Mobile Phone from PS KTS.

4. That it is incorrect and baseless that on 27-02-2018 I was without uniform and in plane clothes or accused Zameer was arrested near Paris Hotel GT road Haripur and took him to Chungi No.2 KTS, or accused was threatened or Rs.45000/- were extracted from him or a false FIR was registered against him. In fact the persons having enmity against me have woven the web so craftily that false and truth could not be separated and the allegations emerged from false, fabricated and manipulated disinformation communicated to the worthy District Police Officer Haripur which resulted into initiating of instant inquiry. Otherwise even an

OR/OHC

District Police Officer
Haripur

OB No
378

30.5.2018

(11)

iota of truth does not exist in the allegations as leveled against me. The factual situation has been averred in preceding paragraphs.

5. That if there had been any truth in the allegations as mentioned in the instant Final Show Cause Notice then on 28-02-2018 when the accused Zameer Khan was produced before the Judicial Magistrate Haripur had ample opportunity to have disclosed that he was innocent, wrongly arrested, charas was planted upon him and a sum of Rs.45000/- were extracted from him by the local police instead of pleading his guilt through written application. Further more after his release; he submitted application through his Counsel for return of amount and Nokia Mobile alongwith SIM recovered at the time of his bodily search for which release order was passed and he received these things from PS KTS which the accused received from the Moharrir PS KTS.
6. That from aforementioned facts it emerges that I was, falsely and under complete machination, involved in the instant case by persons having personal grudge and vendetta against me. Because during my posting at PS KTS, I had arrest 65 strong narcotics paddlers against whom cases were registered. I have discharged my duties with due diligence, devotion and honesty.
7. That I am totally innocent in the instant case and the charges as leveled in the Final Show Cause Notice are nothing more than mere allegations hence vehemently denied.
9. That if I am provided with the opportunity of personal hearing then I shall really try my best to bring the all the facts and circumstances of the matter in to the knowledge of your goodself and to clear my position by proving myself as innocent.

In view of the above facts and circumstances it is request that the instant Final Show Cause Notice may kindly be filed without further proceeding. Thanking you sir in anticipations.

Your Obedient Servant


(Nadeem Shahzad)

Constable No. 525
Police Lines Haripur

Dated: 25-05-2018

انڈس فائل انڈسٹریل بورڈ

برصغیر کے لیے 525 سہ ماہی کے لیے

نمبر	تعداد	تفصیلات	نمبر شمار
1	1	انڈس	1
2	2	فائل انڈسٹریل بورڈ	2
2	2	جواب خارج سٹیٹ	3
1	1	بیان محمد زمان 1218	4
1	1	انڈسٹریل بورڈ	5
1	1	بیان منظم ضمیمہ	6
1	1	بیان محمد احمد	7
1	1	بیان عمر	8
2	2	نقل دینے والے دو سہ ماہی 27 2/18	9
2	2	نقل دینے والے دو سہ ماہی 27 2/18	10
4	4	درجہ اولیٰ افسانہ	11
2	2	حکم عدالت - نقل دینے والے دو سہ ماہی 27 2/18	12
2	2	جارج سٹیٹ 37-39	13
5	5	مادر لہو کے لیے 18-3	14
2	2	جارج سٹیٹ 3	15

29

کل نمبر 5

CHARGE SHEET

(1) I, *Syed Khalid Hamdani (PSP, QPM)*, District Police Officer, Haripur as competent authority; hereby charge you Constable Nadeem No. 525 as enclosed statement of allegations.

(2) You appear to be guilty of misconduct under Police Efficiency & Discipline Rules 1975 and have rendered yourself liable to all or any of the penalties specified in the said Rules.

(3) You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet and statement of allegation to the Committee/Enquiry Officer as the case may be.

(4) Your written defense, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.

(5) Intimate whether you desire to be heard in person or otherwise.

(6) A statement of allegations is enclosed.

(Syed Khalid Hamdani) PSP, QPM
District Police Officer
Haripur

DISCIPLINARY ACTION

I, **Syed Khalid Hamdani (PSP, QPM)**, District Police Officer, Haripur as competent authority of the opinion that you **Constable Nadeem No. 525** have rendered yourself liable to be proceeded against as you committed the following acts/omissions within the meaning of Police Efficiency & Discipline Rules 1975.

STATEMENT OF ALLEGATION

"That you while posted at PS KTS you along with HC Baber Mukhtiar No.206 in plane clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem dad Khan presently r/o chungi No.11 TIP near Paris Hotel G.T road Haripur and took him at Chungi No.2 KTS and threaded him to register a false narcotics case if he failed to give illegal gratification of Rs.60000, through bargain you alongwith Constable Nadeem extracted Rs.45000 from him and also charged him in case FIR No. 120 dated 27.03.2018 u/s 3/4 EHO PS KTS, you committed an offense vide FIR No.127 dated 01.03.2018, u/s 382,342,506/34PPC PS KTS, your involvement in heinous criminal case is gross misconduct under police efficiency and discipline Rules 1975, hence, charge sheeted"

(2) For the purpose of scrutinizing the conduct of the said accused officer with reference to the above allegations, an Enquiry Committee consisting of the following is constituted.

Mr. Shams ur Rehman SP INV Haripur

(3) The Enquiry Officer/Committee shall in accordance with the provision of this Ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action against the accused.

(4) The accused and a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer/Committee.

(Syed Khalid Hamdani) PSP, QPM
District Police Officer
Haripur

No: 37 - 39 /PA, dated Haripur the 05/03 /2018.
Copy of above is submitted to the: -

- 1) Regional Police Officer, Hazara Region, Abbottabad please.
- 2) Enquiry Officer for initiating proceedings against the said accused under Police Efficiency & Discipline Rules 1975.
- 3) **Constable Nadeem No. 525** with the direction to submit his defense within 7 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer on the date, time and place fixed for the purpose of departmental proceedings.

District Police Officer
Haripur

To

Mr. Shams-ur-Rehman,
The Superintendent of Police,
Investigation,
(Inquiry Officer)
Haripur.

SUBJECT:- REPLY TO THE CHARGE SHEET.

Respected Sir,

With most respect it is submitted that Charge Sheet alongwith statement of allegations issued by the worthy District Police Officer Haripur vide No.37-39 dated 05-03-2018 has been delivered to me on 06-03-2018. My detail reply is as under:-

1. That on 27-02-2018, I alongwith IHC Babar Mukhtiar, Constable Akash No.728 and Constable Zahid No. 4696, in uniform, in a private vehicle was on routine mobile duty. At 1940 hours when present at Bypass Road near Choar Colony a suspected man was seen in the light of vehicle. He was stopped and searched and charas wrapped in polythene shopper was recovered from him. While weighing the same on the spot, it was found 480 grams. 05 grams charas was separated and two parcels, one for FSL and the other for rest of the charas, were prepared. On his bodily search a sum of Rs. 45010/- and one Nokia Mobile Model No.6300 were also recovered. Recovery Memo and Murasila were drafted on the spot by IHC Babar Mukhtiar and sent to PS KTS for recording FIR. (Copies of Daily Dairies Showing departure and arrival, Murasila and Recovery Memo all dated 27-02-2018 are attached herewith as "A" to "D").

That on 28-02-2018, a complete challan was submitted and the accused produced in custody before the Judicial Magistrate Haripur. Accused through his written application pleaded his guilt before the Judicial Magistrate, whereupon he was convicted and sentenced under Section 3 EHO to undergo 02 days SI and to pay the fine of Rs.500/-. (Copies of Challan, application and punishment order all dated 28-02-2018 are attached herewith as "E, F & G").

3. That 04-03-2018, after release from Jail the accused submitted application through his Counsel before the Judicial Magistrate Haripur for return of his recovered money of Rs. 45010/- and a Nokia Mobile Phone alongwith SIM No.0336-5401520 whereupon order dated 07-03-2018 was passed and the accused received his amount and Mobile Phone from PS KTS. (Copies of application, Order and Daily Dairy No.12 dated 08-03-2018 are attached as "H, I & J").

4. That it is incorrect and baseless that on 27-02-2018 I was without uniform and in plane clothes or accused Zameer was arrested near Paris

*PN
Call him on
my work no
3.
Play.
S.P. HR*

(2)

(16)

Hotel GT road Haripur and took him to Chungi No.2 KTS, or accused was threatened or Rs.45000/- were extracted from him or a false FIR was registered against him. In fact the persons having enmity against me have woven the web so craftily that false and truth could not be separated and the allegations emerged from false, fabricated and manipulated disinformation communicated to the worthy District Police Officer Haripur which prejudiced him against me and resulted in to issuing of Charge Sheet under reply. Otherwise even an iota of truth does not exist in the allegations as incorporated in the instant Charge Sheet. The factual situation has been averred in preceding paragraphs.

5. That if there had been any truth in the allegations as mentioned in the instant Charge Sheet then on 28-02-2018 when the accused Zameer Khan was produced before the Judicial Magistrate Haripur had ample opportunity to have disclosed that he was innocent, wrongly arrested, charas was planted upon him and a sum of Rs.45000/- were extracted from him by the local police instead of pleading his guilt through written application. Further more after his release: he submitted application through his Counsel for return of amount and Nokia Mobile alongwith SIM recovered at the time of his bodily search for which release order was passed and he received these things from PS KTS which the accused received from the Moharrir PS KTS.
6. That from aforementioned facts it emerges that I was, falsely and under complete machination, involved in the instant case by persons having personal grudge and vendetta against me. Because during my posting at PS KTS, I had arrest 65 strong narcotics paddlers against whom cases were registered. I have discharged my duties with due diligence, devotion and honesty. (List o accused Narcotics Offenders is attached as "K").
7. That I am totally innocent in the instant case and the charges as leveled in the Charge Sheet are nothing more than mere allegations hence vehemently denied.
8. That if I am provided with the opportunity of personal hearing then I shall really try my best to bring the all the facts and circumstances of the matter in to the knowledge of your goodself and to clear my position by proving myself as innocent.

In view of the above facts and circumstances it is request that necessary recommendation may kindly be made for filing of instant Charge Sheet without further proceeding being charges incorrect, false, baseless, concocted and fabricated ones. Thanking you sir in anticipations.

Your Obedient Servant

Nadeem
(Nadeem Shahzad)

Constable No. 525

Police Lines Haripur

03078104123

Dated: // -03-2018

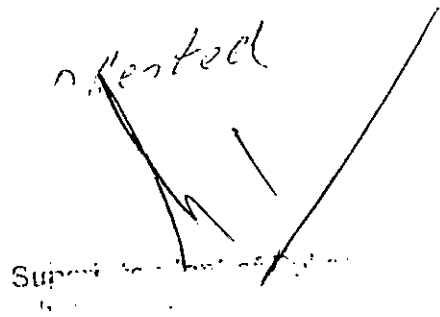
جزء 1

در (1) به جز (2) که در آنجا، $\frac{1}{2}$ و $\frac{1}{3}$ را با هم جمع می‌کنیم

کو (1) را از (2) کم می‌کنیم $\frac{1}{2} - \frac{1}{3} = \frac{3}{6} - \frac{2}{6} = \frac{1}{6}$ (1) را از (2) کم می‌کنیم

پس $\frac{1}{6}$ را به (1) اضافه می‌کنیم $\frac{1}{2} + \frac{1}{6} = \frac{3}{6} + \frac{1}{6} = \frac{4}{6} = \frac{2}{3}$

میرا سی سال است که در این کار
میرا 5 سال است که در این کار
2 5 18



SPP for the state present. Petitioner present.

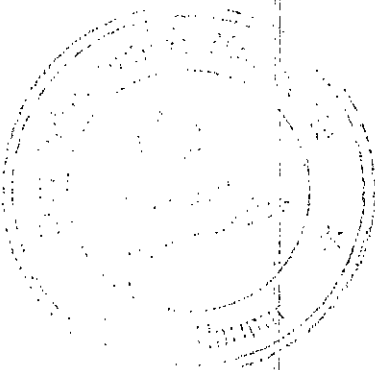
Petitioner namely Zameer son of Karam R/O Langriyal, Tehsil and District, Haripur seeks for return of amount of Rs: 45010/- and mobile Nokia 6503 along with sim card which were taken into possession in case FIR No: 120 dated 27.02.2018 U/S ¼ EHO PS KTS, District Haripur.

Perusal of the available record reveals that an amount of RS: 45010/- and mobile phone have been taken into possession in the above cited case vides recovery memo dated 27.02.2018 from personal search of the petitioner. Case file reveals that case is already disposed off on the basis of plead guilty. There is no rival claimant and also the alleged amount and mobile phone etc are no more required to the local police for further investigation. Investigation in the present case totally complete. It will serve no useful purpose if the amount and mobile phone etc are lying in the police station.

In view of the above, instant application is accepted and the amount of RS: 45010/- and mobile phone be returned to the present petitioner.

Requisitioned record be returned to the concerned quarter whereas this file be consigned to the record room after proper compilation and completion.

Handwritten notes:
The case is disposed
on 27/02/2018
on the basis of
plead guilty
U/S 404
IPC
7-3-18



SHAHID NEEZ MOOD
Judicial Magistrate-I, Haripur
07/03/18

Attest ed
(Signature)
Haripur

بیان نکات کافی در این

بیان نمودند. در فراموشی با این فرقی است. کالیبر بندی
 بود محمد بن قاسم در آن زمان که هر یک از آن کتب که کتب کتب است
 کتابی که در این است همانا وقت کتابه رسم جلیع است که در آن
 است که در این است که در فراموشی در این است که در این است
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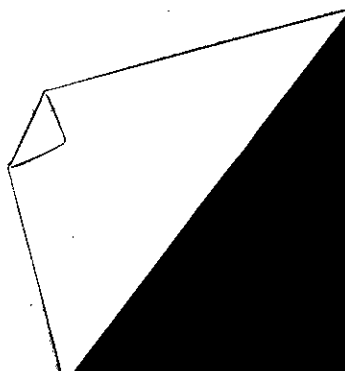
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1-0529578-03802

کتابخانه

M. Hassan

Allestack



بازای عملی و در سطح اولی

بازای عملی که در این مورد است بر طبق این صورت است که
 525 بر این صورت است که در این مورد است که در این صورت است که
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0336/5401520

37405-7143238-3

مهرم

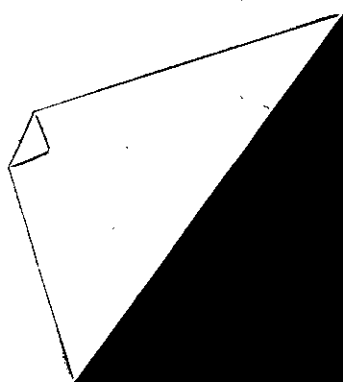
مهرم



Attested

[Signature]

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بیان اہل مہر نگر ولد سرکار سید مال علی

بیان میں کہ میں نے جو درگاہ کے برصغیر میں اختیار کیا ہے اس کا نام 525
 ہے جو کہ مالک اور اس کے ساتھ موجود ہے۔ اس کا نام 45 ہے اور اس کے
 ساتھ اسم لکھا ہے۔ جو کہ درگاہ کے ساتھ لکھا ہے۔ اس کا نام لکھا ہے
 جو کہ مالک کے ساتھ ہے جو کہ درگاہ کے ساتھ ہے۔ اس کا نام لکھا ہے
 اس کا نام لکھا ہے جو کہ درگاہ کے ساتھ ہے۔ اس کا نام لکھا ہے
 اس کا نام لکھا ہے جو کہ درگاہ کے ساتھ ہے۔ اس کا نام لکھا ہے

0332/5394492
 37405-7302048-9

26/4/18

attested
 Superintendent of Police
 Bahawalpur

صلاح فقیری گورنر

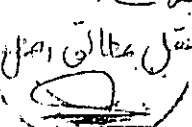
(3)

نقل ریٹ نمبر 24 روزانہ 27²/₁₈

22
فنانس CTS
CA7

روایتی بالبرفختیار 9HC 27²/₁₈ وقت 19:05 میں مع کنٹینر 25 رابنہ زاپہ 4696
آکاش 728 نفرین پتہ براری منشیات فروشیوں (سوار) کاڑی (سوار) پتہ براری (سوار) (سوار) (سوار)

کامیوں

صاحب عالی
نقل مطالبہ اصل


MM.PS.CTS

(B)

فنانس CTS

صلاح فقیری گورنر

نقل ریٹ نمبر 33 روزانہ 27²/₁₈

33 نمبر والی بالبرفختیار 9HC 27²/₁₈ وقت 21:15 میں مع ہر ایمان کے دفتر کے گورنر 24 بالا اعداد
گنت والی (ایس آئی اے) دوران گنت ایک شخص کو مشتبہ حالت میں پا کر جامع تلاشی
حسب ضابطہ عمل میں (آئی ڈی) کا مع تلاشی عمل کر کے درپور اسٹور سے 480 گرام میں
برائے کوئی جو قہر میں کرک ڈیگرام کا FSL جانے پاتے ہیں۔ یہ قہر قہوت پر مشتمل
قہر میں کرک دریافت ہر مذکورہ کے ایسا نام کے نام دار کے ساتھ ساتھ
حال میں ایسا قبضہ حسب ضابطہ گرفتار کر کے ہمراہ لے کر بعد میں حکم صادر ہوا ہے (آئی ڈی)
نہروالہت چھان بھاننا ہے فرد ایس عدالت لیا جا گا

نہروالہت
① نفر
3/4

صاحب عالی
نقل مطالبہ اصل



MM.PS.CTS

(4)

27/3

'A.C'

تاریخ جمعہ 27/3/1940 ع
تاریخ جمعہ 27/3/1950 ع

مکاتہ وقوعہ بہ بالا ایسا روز جمعہ 27/3/1940 ع

480

کثیرہ دفتر دہلی

روز جمعہ 27/3/1940 ع
تاریخ جمعہ 27/3/1950 ع
مکاتہ وقوعہ بہ بالا ایسا روز جمعہ 27/3/1940 ع
تاریخ جمعہ 27/3/1950 ع
مکاتہ وقوعہ بہ بالا ایسا روز جمعہ 27/3/1940 ع
تاریخ جمعہ 27/3/1950 ع

داتا
27/2/2018

38/40

0336-5601520

attested to be a true copy
Authorized USA 8701
Gazette-Shahadat order 1984
07 MAR 2018
EXAMINER
District & Session Judge

Handwritten signature and date

(5)

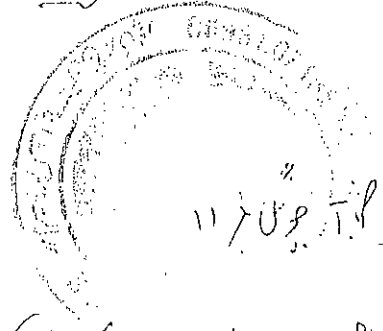
23/3

D

طراحی نمودار

فردی که در این باره است

کاغذ



موضوع: 2018/480 جرم 27/18

بازرسی در باره فرزند طعم پانا...

در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
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 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...
 در روز 27/3/2018 در محضر دادگاه جنایتکارانه...

[Signature]
 27/3/2018

فردی که در این باره است


[Signature]

2018/480 جرم 27/18

Notated to be a True Copy
 Authenticated U/A 377
 07 MAR 2019
 EXAMINER
 District & Sessions Judge
 Hampi

[Signature]

فارم چالان مکمل

6	5	4	3 ملزمان		2	1
مختصر کیفیت جرم	تفصیل گواہان	تفصیل بالمقدمہ	زیر حراست	بیہ ضمانت	ملزمان جو گرفتار نہ ہوئے ہوں۔ بشمول مفرودان	نام مستغیث
<p>طابقہ نو ماہ 2 مورچوں کے و سائیکل پر سوار ہو کر... کہ نامیہ و وضع پر غائبہ خانہ ات بروڈ ایئر ایس ایس نزد حور برادری من سید خانہ کو جب بنا دہ شہادت ماہ میں خانہ پر تیار کیا۔ بروڈ زور پر جس کے نرسا قلعہ قمر ایس ایس پر مقرر تھا اس نے سید پر 18/2/18 میں بروڈ پر ہو کر سہاگہ میں اگے اگے سنا لیا گواہان فرمودتہ ملک قلعہ قمر سے اپنے وقت قید میں کو رہائش دینے کو سہاگہ میں تھا کہ قلعہ قمر کو میں شہار علیا گارہ ایس ایس اور سہاگہ قلعہ قمر میں رہنے کو سہاگہ میں۔ شہار علیا گارہ سہاگہ شہار علیا گارہ میں رہنے کو سہاگہ میں رہنے کو سہاگہ میں</p> <p>15/2/18 28/2/18</p>	 <p>تفصیل گواہان</p> <p>14/2/18 15/2/18 16/2/18</p>	<p>تفصیل بالمقدمہ</p> <p>14/2/18 15/2/18 16/2/18</p>	<p>ملزمان</p> <p>زیر حراست</p> <p>بیہ ضمانت</p>	<p>ملزمان جو گرفتار نہ ہوئے ہوں۔ بشمول مفرودان</p>	<p>نام مستغیث</p> <p>6</p> <p>28/2/18</p>	

Attested to be a True Copy
 Authorized U/A 87 of
 Section 203 of Cr.P.C.
 10 MAR 2018
 MINER
 Sessions Judge

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23/3

F

شہادت جناب چوڈھل پبلسٹیٹی صاحب ہسٹری بورڈ
سرکار بنام: ضمیر

نوالہ مقدمہ علت 120 مورخہ 18-02-27 م۔ EHO 3/4 قانہ K.T.S

درخواست اقبال جرم و صدور فیصلہ عنوان الذکر

جناب عالی! درخواست عرض ذیل ہے۔
یہ کہ سائل ملزم مقدمہ بجرم عنوان میں بخوشی و برضامندی خود بلا جبر اقبال جرم کرتا ہوں اور اپنے آپ کو عدالت کے رحم و کرم پر چھوڑتا ہوں اور کاروائی A-241 ض۔ ف۔ کے حقوق سے متبردار ہوتا ہے۔

استدعا ہے کہ مقدمہ کا ایمر وز فیصلہ فرمایا جا کر دادرسی فرمائی جاوے۔

28⁰²/₂₀₁₈ المرقوم:

[Handwritten Signature]
28/02/18

سید ولد کرم داد خان سید سنگھ بیاں 113 چوڈھل پبلسٹیٹی بورڈ

[Fingerprint]
ضمیر خان

attested to be a true copy
Authorized Officer
Gangon-e-Shahadat
07/02/2018
District

07

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9

Handwritten notes and signatures at the top of the page, including names like 'Karam Dad' and dates like '28/2/18'.

THE COURT OF SHAHID MELMOOD, JUDICIAL MAGISTRATE-I, HARIPUR
Case No. 120, Dated 27.02.2018, under section 34 EHO of Police Station KTS Haripur

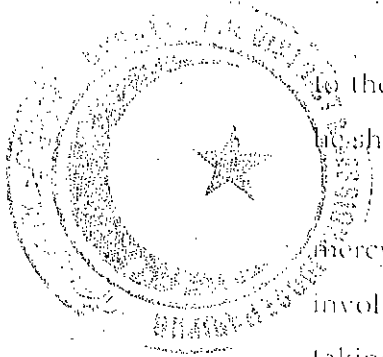
01
2018

Complete challan submitted by the prosecution. It be registered.
Accused Zameer son of Karam Dad produced in custody who moved an application for disposal of his case today on the basis of plead guilty, without availing further opportunity, by relinquishing his rights to comply with the provisions of section 241-A Cr.PC.

Formal charge framed against the accused of which accused pleaded his guilt and requested for mercy of the court.

Show cause notice under section 243 of the Cr.PC was given to the accused but he is unable to show sufficient cause as to why he should not be convicted for the subject offence.

As accused has pleaded his guilt and left himself at the mercy of the court. More so, record is silent about the previous involvement of the accused in such like cases. Therefore, while taking lenient view accused is convicted and sentenced under section 34 EHO to undergo for 02 days SI and to pay the fine of Rs. 500/-. In case he fails to pay the fine, he will have to undergo SI for 01-day. Case property if any be dealt with in accordance with law. All personal belongings of accused if any be returned forthwith. File be consigned to record room after its completion and compilation.



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Filed
07

Attended to by a ...
Authorized U.A. ...
07 MAR 2018
EXAMINER
District & Session Judge
Haripur

SHAHID MELMOOD,
Judicial Magistrate-I,
Haripur

3226 = 07-03-18
Date of presentation of Application
No. of Words. 07 Pages
Copying Fee
Urgent Fee
TOTAL
Name of Officer
Date of receipt of Application
Date of disposal of Application

9

بسم الله الرحمن الرحيم
وذكر رسول الله صلى الله عليه وسلم

H

صغير ولد زنا در کتبه شتر ذیل مال مستقیم ص ۱۱۱ و فوتمبر ۱۱۱۱ و کتبه در نخله میوه در

۰۵-۰۳-۱۸
۱۱-۵۰

۱۱

کتبه در نخله میوه در کتبه شتر ذیل مال مستقیم ص ۱۱۱ و فوتمبر ۱۱۱۱ و کتبه در نخله میوه در

کتبه	مکتب	مکتب	مکتب
۱۲۰	۳/۴۲۱۰	۲۷/۰۲ ۲۰۱۸	۱۹-۰۳-۱۸

در زمانه جواد علیه السلام بر آنکه عکاشه را فتح بکند / ۴۵۰۱۰ / ۱۹-۰۳-۱۸
 آنکه از آن سالی بنامه شتر ذیل مال مستقیم ص ۱۱۱ و فوتمبر ۱۱۱۱ و کتبه در نخله میوه در ۶۳۰۳
 جمع ۰۳۳۶-۵۴۰۱۵۲۰
 کتاب مالی بیان در وقت ذیل علیه السلام

کتبه در نخله میوه در کتبه شتر ذیل مال مستقیم ص ۱۱۱ و فوتمبر ۱۱۱۱ و کتبه در نخله میوه در

کتبه در نخله میوه در

۱۹-۰۳-۱۸ / ۴۵۰۱۰ / ۱۹-۰۳-۱۸

10

مجلس شورای اسلامی - کمیسیون تخصصی

شماره پرونده: ...

3- ...

05-03-18

4- ...

کمیسیون تخصصی ...

04/03/2018

شماره پرونده: ...
صورتجلسه

کمیسیون تخصصی ...

04/03/2018

شماره پرونده: ...
صورتجلسه

11

9/

ORDER---02
07.03.2018

SPP for the state present. Petitioner present.

Petitioner namely Zameer son of Karam R/O Langriyal, Tehsil and District, Haripur seeks for return of amount of Rs: 45010/- and mobile Nokia 6303 along with sim card which were taken into possession in case FIR No: 120 dated 27.02.2018 U/S ¼ EHO PS KTS, District Haripur.

Perusal of the available record reveals that an amount of RS: 45010/- and mobile phone have been taken into possession in the above cited case vides recovery memo dated 27.02.2018 from personal search of the petitioner. Case file reveals that case is already disposed off on the basis of plead guilty. There is no rival claimant and also the alleged amount and mobile phone etc are no more required to the local police for further investigation. Investigation in the present case totally complete. It will serve no useful purpose if the amount and mobile phone etc are lying in the police station.

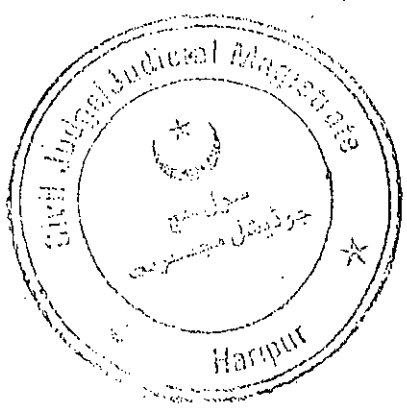
In view of the above, instant application is accepted and the amount of RS: 45010/- and mobile phone be returned to the present petitioner.

Requisitioned record be returned to the concerned quarter whereas this file be consigned to the record room after proper compilation and completion.

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Handwritten notes in Urdu script on the left margin, including a signature and the date 8/3/18.

SHAHIL MEHMOOD
Judicial Magistrate-1, Haripur
07/03/18



12

J

نقل ریٹ مدد ۱۲ روپے فی گھنٹہ $8 \frac{3}{18}$

تفاح CETS

۱۲ مہرے ریٹ جو انکی آمد آمد سے $8 \frac{3}{18}$ وقت ۱۰۲۰ تک (۳۱) وقت پھر ولد کر دار
 مسکنہ گنڈاپال منڈی کارڈ نمبر 3-7143288-37405-37405 رابطہ نمبر 0336-5401520
 عاصمی تفاح پیمانہ آرڈر سپرداری قدرت رقم مبلغ 4500/- و سو یا نام فون جاریہ کوہاٹ
 JMI مہرے کی پور جو کہ جو الہ و قدرہ عدالت $120 \frac{20}{18}$ جرم $3 \frac{3}{18}$ میں قہ ضرہ پولیس ہے
 جو ہا۔ سو صوفان جو الہ ان کی کا حکم ہمارے فرمایا جو کہ لہ قدر لہ قدر لی جو اس ماس
 جو کہ دہشتہ و معمولی لہا جا کر دہشتہ 19 کی تکمیل کی گئی ان وقت ہمارے

جا عالی

نقل و روانہ

Signature

mm ps-CETS

8-3-18

CETS

تفاسر KTS

سازگاری کبیشل نیم شهزاد 525

تفاسر KTS

فهرست منشیات فرودستان متعلقه حلوان گارد اولی ای تقاضا KTS

ردیف	نوع منشیات	مقدار	تفاسر	نام دارنده	تفاسر
1	فردم سلان	132	فردم 31	فردم سلان	3/4
2	فردم سلان	133	فردم 31	فردم سلان	3/4
3	فردم سلان	134	فردم 31	فردم سلان	3/4
4	فردم سلان	136	فردم 4	فردم سلان	3/4
5	فردم سلان	138	فردم 8	فردم سلان	3/4
6	فردم سلان	139	فردم 8	فردم سلان	3/4
7	فردم سلان	140	فردم 8	فردم سلان	3/4
8	فردم سلان	141	فردم 12	فردم سلان	3/4
9	فردم سلان	142	فردم 6	فردم سلان	3/4
10	فردم سلان	143	فردم 6	فردم سلان	3/4
11	فردم سلان	144	فردم 13	فردم سلان	3/4
12	فردم سلان	159	فردم 26	فردم سلان	3/4

وقار ان دلہ مقبول الرعيل قوم سوانی سکھ کا دلہ

قدومہ عیلت 176 فرسہ $\frac{7}{17}$ 229 قوم $\frac{9-C}{CNSA}$

م آمدنی 1000 گرام جیوس

زیر دلہ عبد الرزاق سکھ دلہ مقبول سکھ قبیلہ

قدومہ عیلت 178 فرسہ $\frac{7}{17}$ 30 قوم $\frac{9-C}{CNSA}$

م آمدنی 1018 گرام جیوس

بلاچ دلہ انجہ مان قوم انجوان سکھ مخصوصہ سکھ

قدومہ عیلت 184 فرسہ $\frac{8}{17}$ 2 قوم $\frac{9-B}{CNSA}$

م آمدنی 910 گرام جیوس

شیرین سکھ جندوا دلہ فرسہ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 186 فرسہ $\frac{8}{17}$ 3 قوم $\frac{9-C}{CNSA}$

م آمدنی 2100 گرام جیوس

یا سکھ مقبول الرعيل قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 187 فرسہ $\frac{8}{17}$ 3 قوم $\frac{9-C}{CNSA}$

م آمدنی 2050 گرام جیوس

اقبال سکھ دلہ سکھ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 200 فرسہ $\frac{8}{17}$ 16 قوم $\frac{9-C}{CNSA}$

م آمدنی 2050 گرام جیوس

شوکا زین دلہ فرسہ زین سکھ دلہ سکھ قبیلہ

قدومہ عیلت 201 فرسہ $\frac{8}{17}$ 17 قوم $\frac{9-C}{CNSA}$

م آمدنی 2045 گرام جیوس

زیر دلہ سکھ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 202 فرسہ $\frac{8}{17}$ 18 قوم $\frac{9-C}{CNSA}$

م آمدنی 1035 گرام جیوس

رحیم دلہ عبد الکریم سکھ قبیلہ

قدومہ عیلت 203 فرسہ $\frac{8}{17}$ 19 قوم $\frac{9-C}{CNSA}$

م آمدنی 1420 گرام جیوس

مظہر دلہ فرسہ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 204 فرسہ $\frac{8}{17}$ 20 قوم $\frac{9-C}{CNSA/ISAA}$

م آمدنی 550 گرام جیوس / 500 گرام جیوس

مظہر سکھ سکھ دلہ سکھ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 205 فرسہ $\frac{8}{17}$ 22 قوم $\frac{9-C}{CNSA}$

م آمدنی 2050 گرام جیوس

عمران زین دلہ فرسہ زین سکھ دلہ سکھ قبیلہ

قدومہ عیلت 206 فرسہ $\frac{8}{17}$ 22 قوم $\frac{9-C}{CNSA}$

م آمدنی 2000 گرام جیوس

مظہر سکھ سکھ دلہ سکھ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 207 فرسہ $\frac{8}{17}$ 23 قوم $\frac{9-C}{CNSA}$

م آمدنی 1800 گرام جیوس

وقار دلہ فرسہ قوم انجوان سکھ سکھ قبیلہ

قدومہ عیلت 227 فرسہ $\frac{9}{17}$ 7 قوم $\frac{9-C}{CNSA}$

م آمدنی 1100 گرام جیوس

<p>عبدالله بن عبد القدر بن قاسم افغان سکنه کویب نمبر 3 پشاور -</p>	<p>قدرت علی 234 طرفہ 9/12 م 9-9 CNSA پرائمری 2050 گرام چھریں</p>	<p>(28)</p>
<p>طارق محمد ولد محمد انور قاسم اعوان سکنه ریلوے سٹیشن پشاور -</p>	<p>قدرت علی 235 طرفہ 9/13 م 9-9 CNSA پرائمری 1115 گرام چھریں</p>	<p>(29)</p>
<p>عبدالغنی بن علی ولد نصیب بن قاسم اعوان سکنه قمر پور سکیر نمبر 1 - KTS</p>	<p>قدرت علی 236 طرفہ 9/13 م 9-9 CNSA پرائمری 1530 گرام چھریں</p>	<p>(30)</p>
<p>نسیم بن علی ولد رحمان بن علی سکنه یوٹا ہاؤس سکیر نمبر 4 - KTS</p>	<p>قدرت علی 238 طرفہ 9/16 م 9-9 CNSA پرائمری 2035 گرام چھریں</p>	<p>(31)</p>
<p>ولاد ابرار ولد محمد فرید قاسم اعوان سکنه فلاہ سیکر نمبر 3 - KTS</p>	<p>قدرت علی 246 طرفہ 9/22 م 9-9 CNSA پرائمری 1150 گرام چھریں</p>	<p>(32)</p>
<p>شہین احمد بن علی ولد فراح قاسم اعوان سکنه فلاہ سیکر نمبر 3 سکیر نمبر 1 - KTS</p>	<p>قدرت علی 254 طرفہ 10/17 م 9-9 CNSA پرائمری 1331 گرام چھریں</p>	<p>(33)</p>
<p>عبدالغنی بن احمد ولد محمد نصیب قاسم اعوان سکنه فلاہ سیکر سکیر نمبر 4 - KTS</p>	<p>قدرت علی 259 طرفہ 10/17 م 9-9 CNSA پرائمری 2025 گرام چھریں</p>	<p>(34)</p>
<p>موسیٰ بن علی ولد پھریں قاسم اعوان سکنه فلاہ سیکر نمبر 4 - KTS</p>	<p>قدرت علی 260 طرفہ 10/17 م 9-9 CNSA پرائمری 1010 گرام چھریں</p>	<p>(35)</p>
<p>عمران رفیق ولد محمد رفیق قاسم اعوان سکنه فلاہ سیکر سکیر نمبر 3 - KTS</p>	<p>قدرت علی 263 طرفہ 10/17 م 9-9 CNSA پرائمری 1150 گرام چھریں</p>	<p>(36)</p>
<p>عارف باور ولد محمد نصیب قاسم اعوان سکنه فلاہ سیکر نمبر 1 KTS</p>	<p>قدرت علی 270 طرفہ 10/17 م 9-9 CNSA پرائمری 1105 گرام چھریں</p>	<p>(37)</p>
<p>غلام محمد بن علی ولد قاسم اعوان سکنه فلاہ سیکر نمبر 4 چھریں - KTS</p>	<p>قدرت علی 272 طرفہ 10/17 م 9-9 CNSA پرائمری 1020 گرام چھریں</p>	<p>(38)</p>
<p>محمد انور ولد محمد یونس قاسم اعوان سکنه فلاہ سیکر نمبر 4 - KTS</p>	<p>قدرت علی 276 طرفہ 10/17 م 9-9 CNSA پرائمری 2075 گرام چھریں</p>	<p>(39)</p>
<p>مظاہر بن علی ولد محمد نواز سکنه فلاہ سیکر نمبر 4 - KTS</p>	<p>قدرت علی 278 طرفہ 10/17 م 9-9 CNSA پرائمری 1015 گرام چھریں</p>	<p></p>

<p>① شماره ارشد وله مستقبل الرحمن سکنه پاره‌خانه</p>	<p>40 مقدمه علت 288 روز 11/17 8/8 CNSA 9-c/14-15 برآمدگی 2025 گرام چیرس -</p>
<p>② سنان احمد وله مستقبل الرحمن سکنه پاره‌خانه ③ نسیم گل وله رحمان گل سکنه قانچیان</p>	<p>41 مقدمه علت 291 روز 11/17 10/10 CNSA 9-c/14-15 برآمدگی 2050 گرام چیرس -</p>
<p>④ نسیان شریف گودا</p>	<p>42 مقدمه علت 297 روز 11/17 13/13 CNSA 9-c برآمدگی 1110 گرام چیرس -</p>
<p>⑤ عظیم اقبال داره قنده اقبال سکنه سیکر پیر 2 KTS</p>	<p>43 مقدمه علت 298 روز 11/17 13/13 CNSA 9-c برآمدگی 1050 گرام چیرس -</p>
<p>⑥ زبیر وله عمیل سکنه چوگلی غیر 2</p>	<p>44 مقدمه علت 299 روز 11/17 14/14 CNSA 9-c برآمدگی 1020 گرام چیرس -</p>
<p>⑦ ساجین احمد وله قادری خان سکنه سکنه پاره ⑧ اشجار احمد داره بهندرزمان سکنه قله درگزی KTS</p>	<p>45 مقدمه علت 301 روز 11/17 17/17 CNSA 9-c/14-15 برآمدگی 1045 گرام چیرس -</p>
<p>⑨ فقیر ازوله قنده ساجین سکنه پانزنی جون KTS</p>	<p>46 مقدمه علت 309 روز 11/17 26/26 CNSA 9-c برآمدگی 1070 گرام چیرس -</p>
<p>⑩ حسن اشجار وله اشجارالمر سکنه قله درگزی KTS</p>	<p>47 مقدمه علت 315 روز 12/17 3/3 CNSA 9-c برآمدگی 1045 گرام چیرس -</p>
<p>⑪ بابرخان وله عبدالغفار سکنه قله درگزی KTS ⑫ غیر الرحمن داره حفیلا الرحمن سکنه قله کبود KTS</p>	<p>48 مقدمه علت 317 روز 12/17 4/4 CNSA 9-c/14-15 برآمدگی 2120 گرام چیرس -</p>
<p>⑬ فرادین وله پنهان خان سکنه قله قیله KTS</p>	<p>49 مقدمه علت 322 روز 12/17 9/9 CNSA 9-c برآمدگی 2100 گرام چیرس -</p>
<p>⑭ وسیرخان وله بنارس خان سکنه سیکر پیر 1 KTS</p>	<p>50 مقدمه علت 327 روز 12/17 13/13 CNSA 9-c برآمدگی 2200 گرام چیرس -</p>
<p>⑮ نور آفت وله محمد پیرادق سکنه قله حاجی KTS</p>	<p>51 مقدمه علت 329 روز 12/17 14/14 CNSA 9-c برآمدگی 1030 گرام چیرس -</p>
<p>⑯ بابرخان وله بابرخان خان سکنه قله کبود KTS</p>	<p>52 مقدمه علت 330 روز 12/17 14/14 CNSA 9-c برآمدگی 1045 گرام چیرس -</p>
<p>⑰ لطفه اقبال وله قنده اقبال سکنه سیکر پیر 2 KTS ⑱ ضعیف حسین وله عبدالملک سکنه سیکر پیر 3 KTS</p>	<p>53 مقدمه علت 344 روز 12/17 27/27 CNSA 9-c/14-15 برآمدگی 1080 گرام چیرس -</p>

محمد بشیر ولد عطشہ شاہ سکندریہ چھوٹی آبادی سکندریہ

مکمل زریب ولد سلطان میاں سکندریہ کھیل تحصیل خاڑی

محمد حسین ولد عبدالرحمن سکندریہ کھیل تحصیل خاڑی

امیر نواز ولد سکندریہ کھیل تحصیل خاڑی

عبدالرزاق ولد خان محمد سکندریہ کھیل تحصیل خاڑی

محمد رفیق ولد محمد رفیق سکندریہ کھیل تحصیل خاڑی

طاہر ولد عبدالرزاق سکندریہ کھیل تحصیل خاڑی

عبدالرحمن ولد عبدالرحمن سکندریہ کھیل تحصیل خاڑی

دانش ولد طارق سکندریہ کھیل تحصیل خاڑی

اقبال حسین ولد خالد نبی ولد درویش سکندریہ کھیل تحصیل خاڑی

محمد نسیم ولد مکمل محمد سکندریہ کھیل تحصیل خاڑی

محمد نسیم ولد کریم داد سکندریہ کھیل تحصیل خاڑی

قدیم علی 01 فروری 01/18 02 جرم CNSA 9-0
برآمدگی 1030 گرام چرس

قدیم علی 03 فروری 01/18 03 جرم CNSA 9-0
برآمدگی 1200 گرام چرس

قدیم علی 09 فروری 01/18 05 جرم 9-0
برآمدگی 1155 گرام چرس

قدیم علی 14 فروری 01/18 08 جرم CNSA 9-0
برآمدگی 1200 گرام چرس

قدیم علی 37 فروری 01/17 19 جرم CNSA 9C/14-15
برآمدگی 1200 گرام چرس

قدیم علی 44 فروری 01/18 22 جرم CNSA 9C/14-15
برآمدگی 2420 گرام چرس

قدیم علی 16 فروری 01/18 25 جرم CNSA 9C/15/18
برآمدگی 1155 گرام چرس

قدیم علی 55 فروری 01/12 01 جرم CNSA 9-0
برآمدگی 1130 گرام چرس

قدیم علی 98 فروری 01/18 15 جرم CNSA 9C/14-15
برآمدگی 1015 گرام چرس

قدیم علی 113 فروری 01/18 22 جرم CNSA 9-0
برآمدگی 1015 گرام چرس

قدیم علی 118 فروری 01/18 24 جرم CNSA 9-0
برآمدگی 1485 گرام چرس

قدیم علی 120 فروری 01/18 27 جرم CNSA 9C/3/4
برآمدگی 480 گرام چرس

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* ظننا اننا نعلم ما نريد
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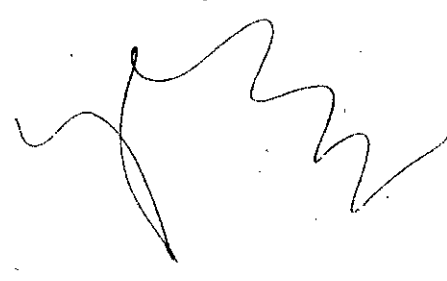
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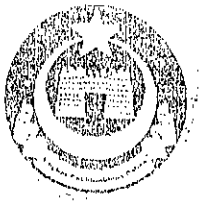
اننا نعلم ما نريد
Paul.

5-6-2018



Received
Paul.

7.6.18



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

38

No. SI 3591

118, dated Peshawar the 05/08/2018.

ORDER

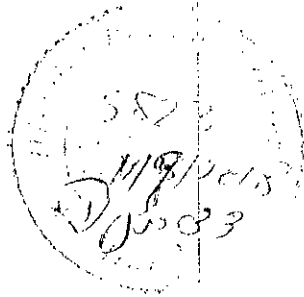
This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-Constable Nadeem Khan No. 525. The petitioner was dismissed from service by DPO, Haripur vide OR No. 378, dated 30.05.2018 on the charge that he while posted at Police Station KTS, Haripur he alongwith Head Constable Babar Mukhtiar No. 206 in plain clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan s/o Kareem Dad Khan r/o Chungi No. 11 TIP near Paris Hotel GT Road Haripur and took him at Chungi No. 2 KTS and threatened him to register a false narcotics case. If he failed to give illegal gratification of Rs. 60000/- through bargain he alongwith Head Constable Babar Mukhtiar No. 206 extracted Rs. 45000/- from him and also charged him in case FIR No. 120 dated 27.02.2018 u/s 3/4 EHO Police Station KTS. In this regard a case FIR No. 127 dated 01.03.2018 u/s 382/342/506/34 PPC Police Station KTS was registered against him.

His appeal was filed by Regional Police Officer, Hazara at Abbottabad vide order Endst: No. 2779/PA, dated 21.06.2018.

Meeting of Appellate Board was held on 30.08.2018 wherein petitioner was heard in person. During hearing petitioner denied the allegation leveled against him.

Petitioner failed to offer plausible explanation in rebuttal of the charges. The Board see no ground and reasons for acceptance of his petition. Therefore, the Board decided that his petition is hereby rejected.

This order is issued with the approval by the Competent Authority.



(ZAB ULLAH KHAN)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. SI 3591, 05/08/18.

Copy of the above is forwarded to the:

1. Regional Police Officer, Hazara at Abbottabad.
2. District Police Officer, Haripur. Service Roll and Fauji Missal containing complete enquiry file of the above named Ex-FC received vide your office Memo: No. 5204, dated 17.08.2018 is returned herewith for your office record.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

SRC/otte
For w/action

DPO HR
11-9-18



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

1643829
10/9/18

No. SI 3596

/18, dated Peshawar the 05/10/2018.

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-Constable Nadeem Khan No. 525. The petitioner was dismissed from service by DPO, Haripur vide OR No. 378, dated 30.05.2018 on the charge that he while posted at Police Station KTS, Haripur he alongwith Head Constable Babar Mukhtiar No. 206 in plain clothes duly equipped with weapons by showing criminals force arrested a citizen namely, Zameer Khan s/o Kareem Dad Khan r/o Chungi No. 11 TIP near Paris Hotel G/F Road Haripur and took him at Chungi No. 2 KTS and threatened him to register a false narcotics case, if he failed to give illegal gratification of Rs. 60000/- through bargain he alongwith Head Constable Babar Mukhtiar No. 206 extracted Rs. 45000/- from him and also charged him in case FIR No. 120 dated 27.02.2018 u/s 3/4 EHO Police Station KTS. In this regard a case FIR No. 127 dated 01.03.2018 u/s 382/342/506/34 PPC Police Station KTS was registered against him.

His appeal was filed by Regional Police Officer, Hazara at Abbottabad vide order Endst: No. 2779/PA, dated 21.06.2018.

Meeting of Appellate Board was held on 30.08.2018 wherein petitioner was heard in person. During hearing petitioner denied the allegation leveled against him.

Petitioner failed to offer plausible explanation in rebuttal of the charges. The Board see no ground and reasons for acceptance of his petition. Therefore, the Board decided that his petition is hereby rejected.

This order is issued with the approval by the Competent Authority.

No. 4591/PA
2018

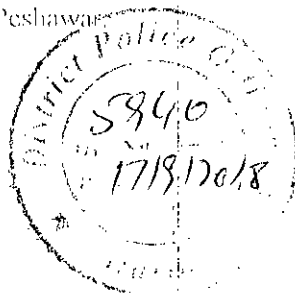
[Handwritten signatures and initials]
PA/HR
for information

No. SI 3597-3603/18.

[Signature]
(ZAIR ULLAH KHAN)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Copy of the above is forwarded to the:

1. Regional Police Officer, Hazara at Abbottabad.
2. District Police Officer, Haripur. Service Roll and Fauji Missal containing complete enquiry file of the above named Ex-FC received vide your office Memo: No. 5204, dated 17.08.2018 is returned herewith for your office record.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/IOs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/IOs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.



SRC
For information
and W/a action
[Signature]
DPO-HR
17-9-18

ORDER

This order is hereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 submitted by *Constable Nadeem Khan No:525* Haripur District against the order of punishment i.e. *Dismissal from service* awarded to him by the DPO Haripur, vide his office OB No: 378, dated 30.05.2018.

Facts leading to punishment awarded to him are that he while posted at PS KTS, he alongwith Constable Nadeem No: 525 in plane clothes duly equipped with weapons by showing criminal force arrested a citizen namely, Zameer Khan r/o Chungi No:11 TIP near Paris Hotel GT Road Haripur and took him at Ghungi No:2 KTS and threatened him to register a false narcotics case if he failed to give illegal gratification of Rs:60000/- through bargain he alongwith Constable Nadeem extracted Rs:45000/- from him and also charged him in case FIR No:120 dated 27.02.2018 u/s EHO PS KTS.

In this regard a case FIR No: 127 dated 01.03.2018 u/s 382/342/506/34 PPC PS KTS was registered against him.

After receiving his appeal, comments of DPO were obtained, which were perused. The undersigned called appellant in O.R on 20.06.2018 where he failed to explain any plausible reason in his defence. Therefore the punishment awarded to him by DPO Haripur i.e. dismissal from service seems to be genuine, which is held and his appeal is *filed*.

[Signature]
REGIONAL POLICE OFFICER
Hazara Region Abbottabad

No. *2779* /PA Dated Abbottabad the *21-6* /2018.

Copy of above is forwarded to the District Police Officer, Haripur vide his office Memo: No: 3683/ dated 19.06.2018 for information and necessary action. Fauji Missal containing enquiry file is returned herewith for your office record.

[Signature]
REGIONAL POLICE OFFICER
Hazara Region Abbottabad

SRC / [Signature]
Jr mie
SRC
[Signature]
DPO [Signature]
27/6

4491
27/6/2018
[Circular Stamp]

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1158 /ST

Dated 3-7- / 2019

To


The District Police Officer,
Government of Khyber Pakhtunkhwa,
Haripur.

Subject: -

JUDGMENT IN APPEAL NO. 852/2018, MR. NADEEM SHAHZAD.

I am directed to forward herewith a certified copy of Judgement dated 17.06.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.