

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 629/2018

Date of Institution ... 25.04.2018

Date of Decision ... 08.07.2019

Aftab Hussain, Ex-Constable, No. 1289, Bannu District.

... (Appellant)

VERSUS

The AIG Establishment for Inspector General of Police, Khyber Pakhtunkhwa and two others. ... (Respondents)

Miss. UZMA SYED,
Advocate

--- For appellant.

MR. M. RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

--- For respondents.

MR. AHMAD HASSAN,
MR. MUHAMMAD HAMID MUGHAL

--- MEMBER(Executive)
--- MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the parties heard and record perused.

ARGUMENTS

02. Learned counsel for the appellant argued that he was falsely implicated in FIR no. 302 under Section 377/506/15-AA/34 PS Domel, District Bannu dated 24.06.2016. As a result of the said FIR, disciplinary proceedings were conducted at the back of the appellant and thereafter major penalty of dismissal from service as imposed on him vide impugned order dated 20.01.2017, against which he filed departmental appeal on 06.02.2017 but was rejected on 07.08.2017. Thereafter, he filed review petition which was dismissed vide order dated 26.03.2018 followed by present service appeal. The impugned order was passed with retrospective effect

was void ab-initio on the strength of case law reported as 2002 SCMR 1129 and 2006 PLC (C.S) 221. Learned counsel for the appellant also relied on judgment of this Tribunal dated 06.11.2017 passed in service appeal on 241/2015. Penalty awarded to the appellant was very harsh and did not commensurate with the quantum of charge/allegations leveled against him.

03. Learned Assistant Advocate General argued that all codal formalities were observed before passing the impugned order. The inquiry officer in his report opined that charges were established against him beyond any shadow of doubt by relying on the medical report.

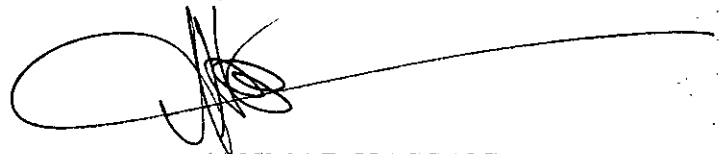
CONCLUSION

04. After minute examination of service appeal, it is not disputed that opportunity of defense and fair trial were denied to the appellant. Prima-facie proceedings were conducted at the back of the appellant and thereafter major penalty was awarded. This fact is further corroborated by para-1 of the enquiry report dated 03.11.2016. Enquiry was conducted in a perfunctory manner and in utter disregard to the procedure laid down in Police Rules 1975. The respondents without serving show cause notice ordered his dismissal, hence, it was a serious illegality and a strong ground to render the subsequent proceedings as nullity in the eyes of law. Our stance has the backing of numerous judgments of the superior courts which were also followed by this Tribunal in many service appeals. Moreover, the appellant was acquitted of the criminal case through judgment passed by the District and Sessions Judge, Bannu on 09.10.2017.

05. As a sequel to the above, the instant appeal is accepted and the impugned orders dated 20.01.2017 and 07.08.2017 are set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with law and rules. The reinstatement of the appellant will 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.



(MUHAMMAD HAMID MUGHAL)
MEMBER



(AHMAD HASSAN)
MEMBER

ANNOUNCED
08.07.2019

13.06.2019

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Farooq, Inspector (Legal) for the respondents present.

Record as per vide order sheet dated 21.05.2019 was produced by the respondents. However, learned Additional AG informed that the appellant filed revision petition under Rule 11-A of Police Rules, 1975 and the same was also rejected by the respondents. Neither the appellant nor the respondents had appended record of the above mentioned revision petition. Both the parties are directed to produce the record pertaining to ^{the} revision petition alongwith rejection order on or before the next date of hearing. Adjourned to 08.07.2019 for record and arguments before D.B.

Order


(AHMAD HASSAN)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

08.07.2019

Counsel for the appellant and Asst: AG alongwith Mr. M. Farooq, Inspector for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today of this Tribunal placed on file, the instant appeal is accepted and the impugned orders dated 20.01.2017 and 07.08.2017 are set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with law and rules. The reinstatement of the appellant will be subject to the outcome of the de-novo enquiry. Parties are left to bear their own cost. File be consigned to the record room.

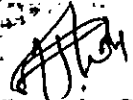
Announced:
08.07.2019



(Muhammad Hamid Mughal)
Member


(Ahmad Hassan)
Member

18.04.2019

Nemo for the appellant Mr. Muhammad Jan learned Deputy District Attorney, alongwith Mr. Muhammad Farooq Inspector for the respondents present. Due to general strike of the bar council learned counsel for the appellant is not in attendance. Adjourned. To come up for arguments on 21.05.2019 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

21.05.2019

Learned counsel for the appellant and Mr. Zia Ullah, DDA alongwith Muhammad Farooq Inspector (legal) for the respondents present.

The appeal was argued at some length when learned DDA requested for time to produce copies of departmental appeal as well as revision petition under Rule 11-A of Police Rules, 1975 submitted by the appellant, in addition to the FSL/ Medical report referred to in the inquiry report dated 03.11.2016.

Instant matter is adjourned to 13.06.2019 before D.B for production of the requisite record.


Member


Chairman

22.11.2018

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney alongwith Mr. Yaqoob Khan Naib Court for the respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file and seeks adjournment. Granted. To come up for arguments on 14.01.2019 before D.B.


Member


Member

14.01.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.03.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

07.03.2019 Appellant in person and Mr. Zia Ullah learned Deputy District Attorney present. Appellant seeks adjournment as his counsel is not in attendance. Adjourn. To come up for arguments on 18.04.2019 before D.B


Member


Member

28.05.2018

Learned counsel for the appellant present.
Preliminary arguments heard.

Vide original impugned order dated 20.01.2017 the appellant (Ex-Constable) was dismissed from service. Learned counsel for the appellant argued that the punishment was awarded to the appellant with retrospective effect hence the limitation would not run in the case of appellant.

Points raised need consideration. The present service appeal is admitted for regular hearing subject all legal objections including the issue of limitation.


Appellant Deposited
Security & Process Fee

The appellant is directed to deposit security and process within 10 days, thereafter notices be issued to the respondent for written reply/comments. To come up for written reply/comments on 13.08.2018 before S.B.


Member

13.08.2018

Counsel for the appellant and Mr. Kabirullah Khattak AAG alongwith Mr. Asghar Ali, Head Constable for respondents present. Written reply by respondent submitted. To come up for rejoinder and arguments on 15.10.2018 before D.B.

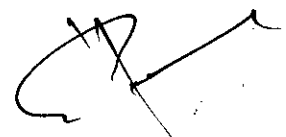

(Muhammad Amin Khan Kundi)

Member

15.10.2018

Clerk to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondent present. Due to general strike of the bar, the case is adjourned. To come up on 22.11.2018 before D.B

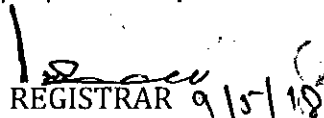


Member


Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 629/2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	09/05/2018	<p style="text-align: center;">The appeal of Mr. Aftab Hussain resubmitted today by Uzma Syed 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;"> REGISTRAR 9/5/18</p> <p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/05/18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	15/05/18.	

The appeal of Mr. Aftab Hussain Ex-Constable no 1289 Bannu received today i.e. on 25.04.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal and its rejection order dated 7.8.2017 mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 2- Copy of revision petition mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

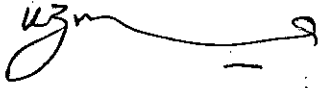
No. 906 /S.T,

Dt. 26/4 /2018.


REGISTRAR 26/4/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Uzma Syed Adv. Pesh.

Sir, the copy of departmental appeal and its rejection order dated 7-8-2017 and copy of revision petition is not available with appellant, the same may be requisite from the department which is also mention in the appeal.


9-5-2018

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 629/2018

Aftab Hussain

V/S

police Deptt:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	1-4
2.	Copy of FIR	A	05
3.	copy of impugned order	B	06
4.	Copy of Acquittal order	C	07-11
5.	Copy of rejection order	D	12
16.	Vakalat nama	-----	13

آفتاب حسین

APPELLANT

Aftab Husain

THROUGH:

(UZMA SYED)

&
(SYED NOMAN ALI BUKHARI)

ADVOCATES HIGH COURT

DATE: 25.04.2018

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 629/2018

Khyber Pakhtukhwa
Service Tribunal

Aftab Hussain , EX- Constable, No.1289
Bannu District.

Diary No. 618

Dated 25-4-2018

.....(Appellant)

VERSUS

1. The AIG Establishment for Inspector General of Police, KPK, Peshawar.
2. The Regional police officer Bannu.
3. The District Police officer Bannu.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE REJECTION ORDER DATED 07.08.2017 OF RESPONDENT NO. 2 WHEREBY THE DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 20.01.2017 HAS BEEN REJECTED FOR NO GOOD GROUNDS AND AGAINST THE ORDER 26.3.2018 RECEIVED BY APPELLANT ON 30.03.2018 WHEREBY THE REVISION UNDER 11-A HAS BEEN REJECTED FOR NO GOOD GROUNDS.

PRAYER:

Filed to-day

[Signature]
Registrar

25/4/18

Re-submitted to -day
and filed.

[Signature]
Registrar

9/5/18

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDERS DATED 26.03.2018 RECEIVED BY APPELLANT ON 30.03.2018, 07.08.2017 AND 20.01.2017 MAY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

Facts giving rise to the present service appeal are as under:

1. That the appellant was appointed as Constable in Police and the appellant was performed his duties with entire satisfaction of his superiors.
2. That the appellant was falsely involved in a criminal case and registered F.I.R No. 302 u/s 377/506/15AA/34 PPC was registered against the appellant. **Copy of FIR is attached as Annexure-A.**
3. That, thereafter, the appellant was departmentally proceeded, without serving any charge sheet, statement of allegation, regular inquiry and even without serving show cause notice, the impugned order dated 20.01.2017 was passed against the appellant whereby the appellant was dismissed from service without waiting till the finalization of the criminal case. The appellant been aggrieved from the impugned dismissal order preferred departmental appeal and the same was rejected vide order dated 7.08.2017 for no good ground and the copy of the departmental appeal and rejection order was not available with the appellant but the same is evident from the order dated 26.03.20218, so the same will may be requisition from the department. **(Copy of impugned order is attached as Annexure-B).**
4. That thereafter, the appellant filed revision under 11-A before the respondent no.1 against the order dated 20.01.2017 and 07.08.2017, and during the pendency of revision petition, the appellant was also acquitted by the Session Judge Bannu on 09.10.2017. **(Copy acquittal order is attached as Annexure-C.**
5. That the revision under 11-A was also rejected by the Respondent no.1 without showing any cogent reason. **(Copy of impugned order is attached as Annexure-D).**
6. That now the appellant come to this august Tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned orders dated 20.01.2017. and 26.03.2018 are against the law, facts, norms of justice and void-ab-initio as has

been passed with retrospective effect and material on record, therefore not tenable and liable to be set aside.

- B) That the impugned order was retrospective order which was void in the eye of law and according to Superior Court Judgment reported as 2002 SCMR, 1129 and 2006 PLC 221.
- C) That there is no order in black and white form to dispense with the regular inquiry which is violation of law and rules and without charge sheet, statement of allegation and proper inquiry the appellant was dismissed from the service vide order dated 20.01.2017 without given personal hearing which is necessary and mandatory in law and rules before imposing major penalty. So the whole procedure conducted has nullity in the eye of law. So the impugned order is liable to be set aside.
- D) According to the judgments of the superior court if the case was not yet finalized against the appellant, the appellant cannot be penalized for that case and consider him innocent till the finalization of the case.
- E) That the penalty order was not under issued under proper law so the penalty order is illegal, void-ab-initio, defective and nullity in the eyes of law.
- F) That under CSR-194/194-A the appellant was suspended till the order of the Competent court but the appellant was dismissed from the service which is against the law and rules.
- G) That the appellant has been condemned unheard and has not been treated according to law and rules.
- H) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- I) That the appellant's guilt has not been proved beyond the shadow of doubt and the appellant has been punished on the basis of conjecture and surmises.
- J) That neither the appellant was associated with the enquiry proceedings nor has any statement of witnesses been recorded in the presence of appellant. Even a chance of cross examination was also not provided to the appellant which is violation of norms of justice.
- K) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

افتاب حسين
APPELLANT
Aftab Husain

THROUGH:

UZMA
(UZMA SYED)

&
(SYED NOMAN ALI BUKHARI)

ADVOCATES HIGH COURT

DATE: 25.04.2018

صحت گننتہ ٹیکس کے ذریعہ درج ذیل پروگرام پر عمل کیا جائے گا۔
خود اپنے آپ کو صحت مند بنانا، صحت مند بنانا، صحت مند بنانا
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DOMET
MTC
16/11/16

اطلاع کے لیے اطلاع دہندہ کا خط لکھ دیا گیا ہے اور اس پر کارروائی کے لیے اطلاع کا دستخط بطور تصدیق ہوگا۔
حروف الف ب س ر و ش تانی ...
بلا نا پاپین

JMI

ORDER:

This order of the undersigned will dispose of the departmental proceeding initiated against accused Officials Constable Aftab Hussain No. 1289 under general proceeding of police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) for committing the following commissions/omissions:-

- That he has committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24-06-2016 PS Domel.

DSP-Saddar, Bannu conducted proper departmental enquiry into the above charges and submitted his findings vide his office memo No.193 dated 03.11.2016, wherein, the accused constable has held guilty of the charges and recommended for major punishment.

In light of the departmental proceeding I, QASIM ALI KHAN, District Police Officer, Bannu in exercise of the power vested in me under police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) hereby dismiss the accused Constable Aftab Hussain No. 1289 from the date of occurrence.

OB No. 56
Dated: 18/01/2017.

(Signature)
QASIM ALI KHAN PSP
District Police Officer,
Bannu.

No. 1109-12 /SRC dated Bannu, the 20-1 /2017

Copies for necessary action to:

1. The DSP/Saddar, Bannu for favour of information with reference to his office Memo: No.193 dated 03.11.2016.
2. The Pay Officer, Bannu.
3. The OASI, DPO Office, Bannu along with the enquiry file for placing it in the Fuji Missal of concerned officials.

Attested

**DSP / HQr:
BANNU**

ATTESTED

محمد اقبال صاحب سیشن جج

4/5AA ریس 23/11/15 قصبہ 09/10/17

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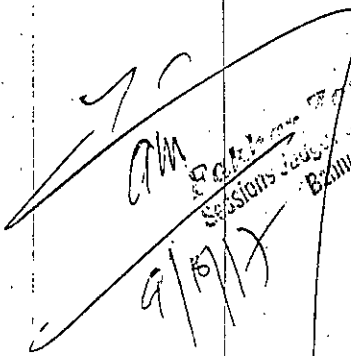
ATTESTED
Copyist
District & Session Judge
Bannu
14-10-15

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ATTESTED

(6)

FORM "A"
FORM OF ORDER SHEET
 Court of **FAKHAR ZAMAN, SESSIONS JUDGE BANNU**
 Case No. 04/AA of 2016
 The State.... vs... Aftab Hussain

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
<p style="text-align: center;">Order</p>	<p style="text-align: center;">09-10-2017</p>	<p>This case was posted for 18-10-2017 but its record was requisitioned today as learned counsel for the accused/petitioner insisted for release of the accused on bail on the ground of statutory delay or in alternative to dispose of the petition for acquittal of the accused under section 265-K of the CrPC.</p> <p>Accused Aftab Hussain, who is behind the bars, is facing trial vide case FIR # 302, dated 24-06-2016, u/s 15 of <i>Khyber Pakhtunkhwa Arms Act, 2013</i>, registered at Police Station Domel of district Bannu. He stands charged for having possessed a .30 bore pistol bearing No. 23029903 alongwith a magazine containing 13 live rounds of the same bore without any valid license or permit, which were recovered from him at the time of his arrest.</p> <p>Accused was formally charged for the commission of offense on 16.01.2017, to which he pleaded not guilty and claimed trial. Despite lapse of almost 10 months, the prosecution has been able to produce only 03 witnesses in this case and those too of a very formal nature. From the statement of Pw-1 it reflects that the recovery of arm and</p>


 Fakhar Zaman
 Sessions Judge
 Bannu
 9/10/17
 ATTESTED
 Copriest
 District & Session
 Bannu
 10/10/17

9

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and of parties or counsel where necessary
1	2	3

ammunition was documented by the Investigation Officer vide Ex: Pw-1/1, prepared on 01-09-2016 after about a week of the alleged recovery. Statement of Pw-3 further reflects that the pistol was packed & sealed on 01-09-2016 by the Investigation Officer which confirms that the same was lying in open condition from 24-08-2016 to 01-09-2016. As such the recovery becomes highly doubtful and could not be made sole basis for conviction.

In view of the above, I am satisfied that the case against the accused facing trial is apparently deficient on many scores. Securing conviction on the given set of evidence would be very hard in the circumstances. I would, therefore, invoke my jurisdiction u/s 265-K of the CrPC and would record acquittal of the accused Aftab Hussain in this case. He is in custody. He be released forthwith if not required in any other case. The arm and ammunition being unlicensed is confiscated to the state. It be kept intact till the expiry of period fixed for appeal/revision, where after it be disposed of in accordance with law. This court file be consigned to record room after necessary completion.

Copy sent
District & Sessions Judge
14/10/17

- 1- Registration No: 10558
- 2- Date of Presentation of Application 11-10-17
- 3- Date of Receipt of the file 14-10-17
- 4- Date of Preparation of copy 14-10-17
- 5- Date of Delivery of copy 17-10-17
- 6- No. of copies / words 17-10-17
- 7- Ordinary Fee 31/8/-
- 8- Urgent Fee _____
- 9- Total Fee 21
- 10- Signature of copyist _____

Announced
09-10-2017

(Signature)
(FAKHAR ZAMAN)
Sessions Judge, Bannu
Sessions Judge, Bannu

ATTESTED

FORM "A"
FORM OF ORDER SHEET
Court of FAKHAR ZAMAN, SESSIONS JUDGE BANNU

Case No. 140/SC of 2016

The State.... vs... Aftab Hussain and others

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
Order	09-10-2017	<p>This case was posted for 18-10-2017 but its record was requisitioned today as learned counsel for the accused/petitioner insisted for release of the accused on bail on the ground of statutory delay or in alternative to dispose of the petition for acquittal of the accused under section 265-K of the CrPC. Complainant as per report of SW is not traceable. Learned Dy.PP is present on behalf of the State. Heard and perused.</p> <p>Accused Aftab Hussain, Fahimullah and Zahirullah, who are behind the bars, are facing trial vide case FIR # 302, dated 24-06-2016, u/s 377/506/364-A/328-A/377-B/34 of the Pakistan Penal Code, 1860, registered at Police Station Domel of district Bannu. They stand charged for having sexually assaulted the complainant beside intimidated him criminally for satisfaction of their unnatural lust.</p> <p>Accused were formally charged for the commission of offense on 16.01.2017, to which they pleaded not guilty and claimed trial. Despite lapse of almost 10 months, the prosecution has been able to produce only 06 witnesses in this case and those too of a very formal nature. Record</p>

ATTESTED
Copy sent to
District & Sessions Judge
Bannu

ATTESTED

(M)

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3

further reflects that the star prosecution witness in this case was complainant Zaheerullah, who never appeared before the court for substantiation of charge against the accused. On the strength of statement of SW-2 recorded on 07-09-2017, complainant was declared untraceable and was thus abandoned.

In view of the above, I am satisfied that the case against the accused facing trial is apparently deficient on many scores. Securing conviction on the given set of evidence would be very hard in the circumstances. I would, therefore, invoke my jurisdiction u/s 265-K of the CrPC and would record acquittal of the accused Aftab Hussain, Fahimullah and Zahirullah in this case. They are in custody. They be released forthwith if not required in any other case. Case property, if any, be kept intact till the expiry of period fixed for appeal/revision, where after it be disposed of in accordance with law. This court file be consigned to record room after necessary completion.

ATTESTED

Copies District & Sessions Judge Bannu 14-10-17

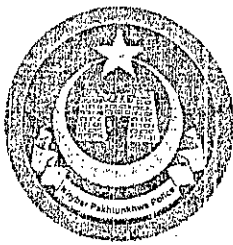
Announced
09-10-2017

(Signature)
(FAKHAR ZAMAN)
Sessions Judge, Bannu

(Signature)
Sessions Judge, Bannu

- 1- Registration No. 10749
- 2- Date of Presentation of Application 14-10-17
- 3- Date of Receipt of the file 14-10-17
- 4- Date of Preparation of copy 14-10-17
- 5- Date of Delivery of copy 14-10-17
- 6- No. of copies / words 14-10-17
- 7- Ordinary Fee 2/-
- 8- Urgent Fee 2/-
- 9- Total Fee 2/-
- 10- Signature of copyist (Signature)

ATTESTED



Amer — D (12)

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.**

No. S/ 1143 /18, dated Peshawar the 26/03/2018.

ORDER

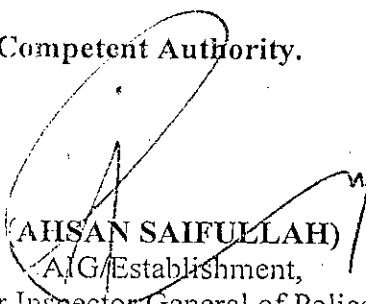
This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-FC Aftab Hussain No. 1289. The petitioner was dismissed from service from the date of occurrence by DPO/Bannu vide OB No. 56, dated 18.01.2017 on the charge that he committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No. 302 dated 24.06.2016 Police Station Domel.

His appeal was filed by Regional Police Officer, Bannu vide Memo: No. 2313/EC, dated 07.08.2017.

Meeting of Appellate Board was held on 01.03.2018 wherein petitioner was heard in person. During hearing petitioner contended that he has been acquitted from the charges by the Court vide judgment dated 09.10.2017.

The petitioner has a bad personal conduct as he was involved in case FIR No. 302 dated 24.06.2016 under section 377/506/15AA/34 PPC Police Station Domel. Therefore, his petition is hereby rejected.

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



(AHSAN SAIFULLAH)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. S/ 1144-50 /18,

Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu.
2. District Police Officer, Bannu.
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.




For Amir Amir

ATTESTED

OPD/18
30/3

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 629/2018

Aftab Hussain

VS

Police Deptt:

.....

REJOINDER TO REPLY ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Para-1 of the appeal is admitted correct by the respondents as service record is already in the custody of respondent department.
- 2 Incorrect. While para-2 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover. The appellant was acquitted from the said criminal case.
- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant.

- 4 Para-4 of the appeal is admitted correct by the respondents as service record is already in the custody of respondent department.
- 5 Incorrect. While para-5 of the appeal is correct as mentioned in the main appeal of the appellant.
- 6 No comments.

GROUND:

- A) Incorrect. The orders of the respondents are against the law, rules and norms of justice therefore not tenable and liable to be set aside.
- B) Incorrect. While para-B of the appeal is correct as mentioned in the main appeal of the appellant.
- C) Incorrect. While para-C of the appeal is correct as mentioned in the main appeal of the appellant.
- D) Incorrect. While para-D of the appeal is correct as mentioned in the main appeal of the appellant.
- E) Incorrect. While para-E of the appeal is correct as mentioned in the main appeal of the appellant. Moreover as explain in above paras.
- F) Incorrect. While para-F of the appeal is correct as mentioned in the main appeal of the appellant.
- G) Incorrect. While para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. While para-H of the appeal is correct as mentioned in the main appeal of the appellant.

- I) Incorrect. While para-I of the appeal is correct as mentioned in the main appeal of the appellant.
- J) Incorrect. While para-J of the appeal is correct as mentioned in the main appeal of the appellant
- K) Legal.

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



APPELLANT

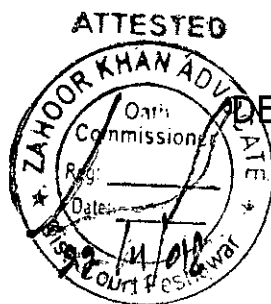
Through:



(UZMA SYED)
&
SYED NOMAN ALI BUKHARI
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.



DEPONENT

VAKALAT NAMA

NO. _____/20

IN THE COURT OF K.Pok Service Tribunal Peshawar

Aftab Hussain

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Department

(Respondent)
(Defendant)

I/We, Aftab Hussain

Do hereby appoint and constitute **Syed Noman Ali Bukhari and Uzma Syed, Advocates Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated 05/4/2018

آفتاب حسین
(CLIENT)

ACCEPTED

Syed Noman Ali Bukhari
SYED NOMAN ALI BUKHARI
Advocate, Peshawar.

Uzma Syed
UZMA SYED
Advocate, Peshawar.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.629/2018

Aftab Hussain Ex-Constable, No.1289,

Bannu District

.....

Appellant

Versus

1. The AIG Establishment for Inspector General of Police, KPK, Peshawar,
2. The Regional Police Officer, Bannu Region, Bannu.
3. The District Police Officer, Bannu

..... Respondents

PARA WISE COMMENTS/REPLY ON BEHALF OF RESPONDENTS NO.1,2 & 3.

Preliminary Objections

1. That the appeal of the appellant is badly time-barred.
2. That the appeal is not maintainable in its present form.
3. That the appellant has concealed the actual facts from this Honorable Tribunal.
4. That the appeal is bad in law due to mis-joinder and non-joinder of necessary parties.
5. That the appellant has approached the Honourable Tribunal with unclean hands.
6. That the appellant has got no cause of action and locus-standi to file the instant appeal.
7. That the appellant has been estopped by his own conduct.

OBJECTIONS ON FACTS:

Respectfully Sheweth

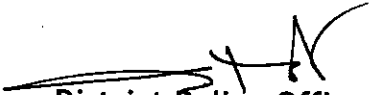
1. Pertains to record. Hence, needs no comments.
2. Incorrect. He has committed/perpetrated the dissolute act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24.06.2016 PS Domel.
3. Incorrect. The appellant was properly charge sheeted based upon statements of allegations. DSP Saddar Circle Bannu was appointed as inquiry officer to probe into the allegations. The inquiry officer after establishment of charges beyond any shadow of doubt, recommended him (appellant) for major punishment of dismissal from service.
4. Pertains to record. Hence needs no comments.
5. Incorrect. The appellant's revision petition was rejected by Respondent No.1 due to directly charged in case vide FIR No. 302 dated 24.06.2016 u/s 377/506/15AA/34 PPC PS Domel Bannu.
6. The respondent department also submit their reply on the following grounds

OBJECTIONS ON GROUNDS


- A. Incorrect. There is no complacency of breaches on the part of respondent department however, on the recommendation of the Enquiry Officer and establishment of allegations the said orders of dismissal were issued.
- B. Incorrect. The impugned orders passed by the Respondent Deptt. is according to the law /rule and policy after conducting proper departmental proceedings.
- C. Incorrect. The appellant was properly charge sheeted, based upon statement of allegations. All codal formalities of defense and personal hearing were provided.
- D. Pertains to record. Hence, needs no comments.
- E. Incorrect. Reply has already been in para "C".
- F. Incorrect. The appellant was given opportunity of defense and personal hearing but he badly failed to rebut the allegations leveled against him.
- G. Incorrect. Reply has already been in para "C".
- H. Incorrect. Proper charge sheet based upon statement of allegation was issued to the appellant and the charges mentioned in the FIR were established. No malafide intentions is on the part of Respondent Department.
- I. Incorrect. Impartial inquiry was conducted, DSP Saddar Circle Bannu was appointed as inquiry officer to probe into the matter. Compendium of the facts is that the charges leveled against him in the instant FIR has been proved after that, the appellant was awarded major penalty of dismissal from service.
- J. Incorrect. Reply has already been given in para "I".
- K. The Respondents department may kindly be allowed to advance any other grounds & material as evidence in the time of arguments.

PRAYER:

In view of the above replies, it is most humbly prayed that the appeal of the appellant may kindly be dismissed with cost please.


District Police Officer,
Bannu
(Respondent No.3)


Regional Police Officer,
Bannu Region, Bannu
(Respondent No.2)


AIG/Establishment for
Provincial Police Officer,
Khyber Pakhtunkhwa Bannu
(Respondent No.1)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Appeal No.629/2018

Aftab Hussain Ex-Constable, No.1289,

Bannu District

.....

Appellant

Versus

1. The AIG Establishment for Inspector General of Police, KPK, Peshawar,
2. The Regional Police Officer, Bannu Region, Bannu.
3. The District Police Officer, Bannu


.....

Respondents

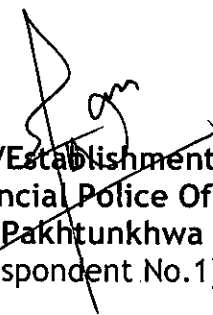
AUTHORITY LETTER.

Mr. Muhammad Farooq Khan, Inspector Legal is hereby authorized to appear before The Service Tribunal Khyber PakhtunKhwa Peshawar on behalf of the undersigned in the above cited case.

He is authorized to submit and sign all documents pertaining to the present appeal.


District Police Officer,
Bannu
(Respondent No.3)


Regional Police Officer,
Bannu Region, Bannu
(Respondent No.2)


AIG/Establishment for
Provincial Police Officer,
Khyber PakhtunKhwa Bannu
(Respondent No.1)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Appeal No.629/2018

Aftab Hussain Ex-Constable, No.1289,

Bannu District

.....

Appellant

Versus

1. The AIG Establishment for Inspector General of Police, KPK, Peshawar,
2. The Regional Police Officer, Bannu Region, Bannu.
3. The District Police Officer, Bannu

.....

Respondents

AFFIDAVIT

I, **Muhammad Farooq Khan**, Inspector Legal representative for Respondent Nos. 1,2 & 3 do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by me are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.


DEPONENT

11101-1483421-1

ابتدائی اطلاع رپورٹ

کوئٹہ

(تاریخ) ابتدائی اطلاع نسبت بڑا قابل دست اندازی ہے لیکن رپورٹ شدہ زیر دفعہ 154، نوعہ ضابطہ نوعداری

تاریخ: 24/5/54

ڈویژن

352

تاریخ وقت: 24/5/54 وقت: 12:30 بجے

1	تاریخ وقت: رپورٹ کی تاریخ	تاریخ وقت: 24/5/54 وقت: 12:30 بجے
2	ناک و سکونت اطلاع دہندہ و مستغیث	ظاہر الہ شہ ولد رشید شاہ سکھہ اسپتالہ ٹورسٹی ضلع ہزارستان سال 1954 میں پیدا ہوا تھا۔
3	تفصیلات (معدومہ) حال اگر کوئی گمان ہے۔	377-506-15AA/34
4	جائے وقوعہ و جملہ قحانہ سے درست	مالہ کاشو خٹہ خٹہ حشر خانہ شہر قحانہ محلہ قحانہ قحانہ 19/5/54 کو قحانہ
5	ناک و سکونت ملزم (1) احساہ	ظہیر الہ شہ ولد رشید شاہ سکھہ اسپتالہ ٹورسٹی ضلع ہزارستان سال 1954 میں پیدا ہوا تھا۔
6	بارہاں پولیس کے مطابق قحانہ کی اطلاع	بارہاں پولیس کے مطابق قحانہ کی اطلاع
7	قحانہ سے روانگی کی تاریخ و وقت	قحانہ سے روانگی کی تاریخ و وقت

تاریخ: 24/5/54

ابتدائی اطلاع کے دوران کوئی ایک شخص نے خود مسلم معاہدہ سے دستبردار ہونے کا اعلان کیا ہے۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔

قحانہ میں سے ملزم احمد علی خان کے آڈیو ریکارڈنگ کے تحت 30/5/54 کو قحانہ میں قتل کیا گیا۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔

قحانہ میں سے ملزم احمد علی خان کے آڈیو ریکارڈنگ کے تحت 30/5/54 کو قحانہ میں قتل کیا گیا۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔ اس شخص کا نام ہے احمد علی خان جو کہ ایک شخص ہے جسے کوئی شخص نے قحانہ میں قتل کیا تھا۔

ORDER:

This order of the undersigned will dispose of the departmental proceeding initiated against accused Officials Constable Aftab Hussain No. 1289 under general proceeding of police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) for committing the following commissions/omissions:-

- That he has committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide File No. 507 dated 24-06-2016 PS Domel.

DSP Saddar, Bannu conducted proper departmental enquiry into the above charges and submitted his findings vide his office memo No.193 dated 03.11.2016, wherein, the accused constable has held guilty of the charges and recommended for major punishment.

In light of the departmental proceeding I, QASIM ALI KHAN, District Police Officer, Bannu in exercise of the power vested in me under police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) hereby dismiss the accused Constable Aftab Hussain No. 1289 from the date of occurrence.

OS No: 56
Dated: 18/01/2017

(Signature)
QASIM ALI KHAN, DSP
District Police Officer,
Bannu

No. 1109-12 /SRC dated Bannu, the 20-1 /2017

- Copies for necessary action to:
1. The DSP/Saddar, Bannu for favour of information with reference to his office Memo: No.193 dated 03.11.2016.
 2. The Pay Officer, Bannu.
 3. The OASI, DPO Office, Bannu along with the enquiry file for placing it in the Fuji Missal of concerned officials.

Attested
↓
DSP / HQF:
BANNU

محمد صابح حسین صاحب

4/15AA رسید 23/11/16 قصبہ 09/10/17

سرکار بنیاد آفتاب حسین

- 1-6 رند گن + آدو دستیا سے آنا + 20 + صم آفر + فارسی فارسی + I و II
- 7-17 3 و 3 محمد الجید + روزگار + فارسی فارسی + فارسی فارسی
- 9-26 فارسی فارسی + فارسی فارسی + فارسی فارسی + فارسی فارسی
- 9-30 فارسی فارسی + فارسی فارسی + فارسی فارسی + فارسی فارسی
- 15-45 فارسی فارسی + فارسی فارسی + فارسی فارسی + فارسی فارسی
- 9-54 رند گن + I و II + فارسی فارسی

54-54

(54)

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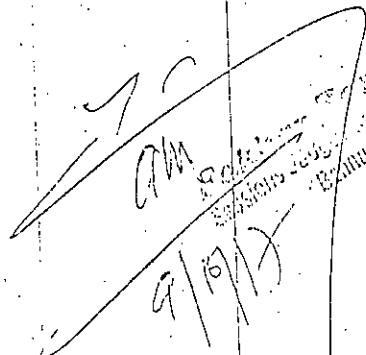
RECEIVED
Copies
District & Session Judge
Gannu
14-10-16

FORM "A"
FORM OF ORDER SHEET
Court of FAKHAR ZAMAN, SESSIONS JUDGE BANNU

Case No. 04/AA of 2016

The State.... vs... Aftab Hussain

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
<p style="text-align: center;">Order</p>	<p style="text-align: center;">09-10-2017</p>	<p>This case was posted for 18-10-2017 but its record was requisitioned today as learned counsel for the accused/petitioner insisted for release of the accused on bail on the ground of statutory delay or in alternative to dispose of the petition for acquittal of the accused under section 265-K of the CrPC.</p> <p>Accused Aftab Hussain, who is behind the bars, is facing trial vide case FIR # 302, dated 24-06-2016, u/s 15 of <i>Khyber Pakhtunkhwa Arms Act, 2013</i>, registered at Police Station Domel of district Bannu. He stands charged for having possessed a .30 bore pistol bearing No. 23029903 alongwith a magazine containing 13 live rounds of the same bore without any valid license or permit, which were recovered from him at the time of his arrest.</p> <p>Accused was formally charged for the commission of offense on 16.01.2017, to which he pleaded not guilty and claimed trial. Despite lapse of almost 10 months, the prosecution has been able to produce only 03 witnesses in this case and those too of a very formal nature. From the statement of Pw-1 it reflects that the recovery of arm and</p>


 Fakhar Zaman
 Sessions Judge
 Bannu
 9/10/17
 ATTESTED
 Popriest
 District Sessions Judge
 Bannu

9

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and the parties or counsel where necessary
1	2	3

ammunition was documented by the Investigation Officer vide Ex: Pw-1/1, prepared on 01-09-2016 after about a week of the alleged recovery. Statement of Pw-3 further reflects that the pistol was packed & sealed on 01-09-2016 by the Investigation Officer which confirms that the same was lying in open condition from 24-08-2016 to 01-09-2016. As such the recovery becomes highly doubtful and could not be made sole basis for conviction.

In view of the above, I am satisfied that the case against the accused facing trial is apparently deficient on many scores. Securing conviction on the given set of evidence would be very hard in the circumstances. I would, therefore, invoke my jurisdiction u/s. 265-K of the CrPC and would record acquittal of the accused Aftab Hussain in this case. He is in custody. He be released forthwith if not required in any other case. The arm and ammunition being unlicensed is confiscated to the state. It be kept intact till the expiry of period fixed for appeal/revision, where after it be disposed of in accordance with law. This court file be consigned to record room after necessary completion.

14/10/17

Registration No: 10559
 Date of Presentation of Application: 14-10-17
 Date of Receipt of the file: 14-10-17
 Date of Preparation of copy: 17-10-17
 Date of Delivery of copy: 17-10-17
 No. of copies/ words: 17-10-17
 Ordinary Fee: 31/2
 Urgent Fee: 2
 Total fee: 2
 Signature of copyist: [Signature]

Announced
09.10.2017

[Signature]
 (FAKHAR ZAMAN)
 Sessions Judge, Bannu
 17/10/17
 Sessions Judge, Bannu

128

FORM "A"
FORM OF ORDER SHEET
Court of FAKHAR ZAMAN, SESSIONS JUDGE BANNU

Case No. 140/SC of 2016

The State.... vs... Aftab Hussain and others

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
1	2	3
<p>Order</p>	<p>09-10-2017</p>	<p>This case was posted for 18-10-2017 but its record was requisitioned today as learned counsel for the accused/petitioner insisted for release of the accused on bail on the ground of statutory delay or in alternative to dispose of the petition for acquittal of the accused under section 265-K of the CrPC. Complainant as per report of SW is not traceable. Learned Dy.PP is present on behalf of the State. Heard and perused.</p> <p>Accused Aftab Hussain, Fahimullah and Zahirullah, who are behind the bars, are facing trial vide case FIR # 302, dated 24-06-2016, u/s 377/506/364-A/328-A/377-B/34 of the Pakistan Penal Code, 1860, registered at Police Station Domel of district Bannu. They stand charged for having sexually assaulted the complainant beside intimidated him criminally for satisfaction of their unnatural lust.</p> <p>Accused were formally charged for the commission of offense on 16.01.2017, to which they pleaded not guilty and claimed trial. Despite lapse of almost 10 months, the prosecution has been able to produce only 06 witnesses in this case and those too of a very formal nature. Record</p>

(Handwritten signature)
 9/10/17
 Sessions Judge,
 Bannu

ATTESTED
 Copyist
 District & Sessions Judge,
 Bannu

(M)

1 No. of Order or Proceeding	2 Date of Order or Proceeding	3 Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
---------------------------------	----------------------------------	--

further reflects that the star prosecution witness in this case was complainant Zaheerullah, who never appeared before the court for substantiation of charge against the accused. On the strength of statement of SW-2 recorded on 07-09-2017, complainant was declared untraceable and was thus abandoned.

In view of the above, I am satisfied that the case against the accused facing trial is apparently deficient on many scores. Securing conviction on the given set of evidence would be very hard in the circumstances. I would, therefore, invoke my jurisdiction u/s 265-K of the CrPC and would record acquittal of the accused Aftab Hussain, Fahimullah and Zahirullah in this case. They are in custody. They be released forthwith if not required in any other case. Case property, if any, be kept intact till the expiry of period fixed for appeal/revision, where after it be disposed of in accordance with law. This court file be consigned to record room after necessary completion.

ATTESTED
 District & Sessions Judge
 Bannu
 14/09/17

Announced
 09-10-2017

(FAKHAR ZAMAN)
 Sessions Judge, Bannu

- 1- Registration No: 10749
- 2- Date of Presentation of Application: 14-10-17
- 3- Date of Receipt of the file: 14-10-17
- 4- Date of Preparation of copy: 14-10-17
- 5- Date of Delivery of copy: 15-10-17
- 6- No. of copies / words: 2/1
- 7- Ordinary Fee: 2/-
- 8- Urgent Fee: 1/-
- 9- Total Fee: 3/-
- 10- Signature of copy: [Signature]

FAKHAR ZAMAN
 Sessions Judge, Bannu



Amere — D (12)
OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. SI/ 1143 /18, dated Peshawar the 26/03/2018.

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975, submitted by Ex-PC Aftab Hussain No. 1289. The petitioner was dismissed from service from the date of occurrence by DPO/Bannu vide OB No. 56, dated 18.01.2017 on the charge that he committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No. 302 dated 24.06.2016 Police Station Domel.

His appeal was filed by Regional Police Officer, Bannu vide Memo: No. 2313/EC, dated 07.08.2017.

Meeting of Appellate Board was held on 01.03.2018 wherein petitioner was heard in person. During hearing petitioner contended that he has been acquitted from the charges by the Court vide judgment dated 09.10.2017.

The petitioner has a bad personal conduct as he was involved in case FIR No. 302 dated 24.06.2016 under section 377/506/15AA/34 PPC Police Station Domel. Therefore, his petition is hereby rejected.

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

(AHSAN SAIFULLAH)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. SI/ 1144-50 /18,

Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu.
2. District Police Officer, Bannu.
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.



SR C/O/MSA
Per Ahmad Raza

OMR
30/3

ORDER:

This order of the undersigned will dispose of the departmental proceeding initiated against accused Officials Constable Aftab Hussain No. 1289 under general proceeding of police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) for committing the following commissions/omissions:-

- That he has committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24-06-2016 PS Domel.

DSP Saddar, Bannu conducted proper departmental enquiry into the above charges and submitted his findings vide his office memo No.193 dated 03.11.2016, wherein, the accused constable has held guilty of the charges and recommended for major punishment.

In light of the departmental proceeding I, QASIM ALI KHAN, District Police Officer, Bannu in exercise of the power vested in me under police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) hereby dismiss the accused Constable Aftab Hussain No. 1289 from the date of occurrence.

OB No. 56
Dated: 18/01/2017


QASIM ALI KHAN PSP
District Police Officer,
Bannu

No. 1109-12 /SRC dated Bannu, the 20-1 /2017

Copies for necessary action to:

1. The DSP/Saddar, Bannu for favour of information with reference to his office Memo: No.193 dated 03.11.2016.
2. The Pay Officer, Bannu.
3. The OASI, DPO Office, Bannu along with the enquiry file for placing it in the Fuji Missal of concerned officials.

✓
✓
C ✓
P ✓
PS ✓
L ✓
J ✓

Jas

ضلع بنوں

1

صدر سرکل

1931 مورخہ: 11/03/16

انگوائری رپورٹ

ازان کنسٹیبل افتاب حسین نمبر 1289 متعینہ پولیس لائن بنوں۔

جناب عالی!

بحوالہ مشمولہ چارج شیٹ نمبر 141-42/SRC مورخہ 11.07.2016 مجاریہ جناب ڈسٹرکٹ پولیس آفیسر صاحب بنوں معروض خدمت ہوں۔ کہ الزام علیہ کنسٹیبل مقدمہ علت 302 مورخہ 24.06.2016 جرم PPC 377-506-16AA-34 تھانہ وہیل میں حسب ضابطہ گرفتار ہو کر چالان عدالت کیا گیا ہے۔ اور تاحال سنٹرل جیل بنوں میں ہے۔ جبکہ بحوالہ آرڈر بک نمبر 491 مورخہ 01.07.2016 معطل بھی ہو چکا ہے۔

جناب عالی!

میڈیکل رپورٹ کے مطابق بھی کمن لڑکے سے زیادتی کا مرتکب اور تفتیش سے گناہ گار پایا گیا ہے۔ ایسے افراد کا محکمہ میں رہنا محکمے کی بدنامی اور ہیومن رائٹس کی خلاف ورزی بھی ہے۔ (Major Punishment) دینے کی سفارش کی جاتی ہے۔ رپورٹ عرض ہے۔



فلک نواز بٹ

ڈی ایس پی صدر سرکل بنوں

He is dismissed
from service

17/1

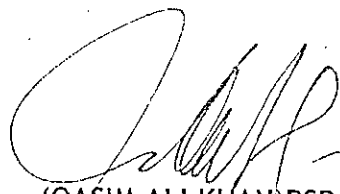
SP

2

CHARGE SHEET:

I, QASIM ALI KHAN, District Police Officer, Bannu, as competent authority, hereby charge you, Constable Aftab Hussain No. 1289 as follows:-

- That you have committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24-06-2016 PS Domel
2. By reason of the above you appear to be guilty of misconduct under the police Rules 1975 (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
3. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.
4. Your written defense, if any, should reach to the Enquiry Officer 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 be taken against you.
5. You are directed to intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.

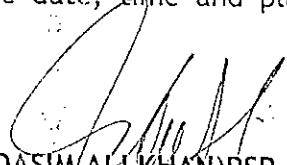

(QASIM ALI KHAN)PSP
District Police Officer,
Bannu.

STATEMENT OF ALLEGATIONS:

I, QASIM ALI KHAN, District Police Officer, Bannu as competent authority, am of the opinion that Constable Aftab Hussain No. 1289 has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of police rules (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014).

SUMMARY OF ALLEGATIONS:

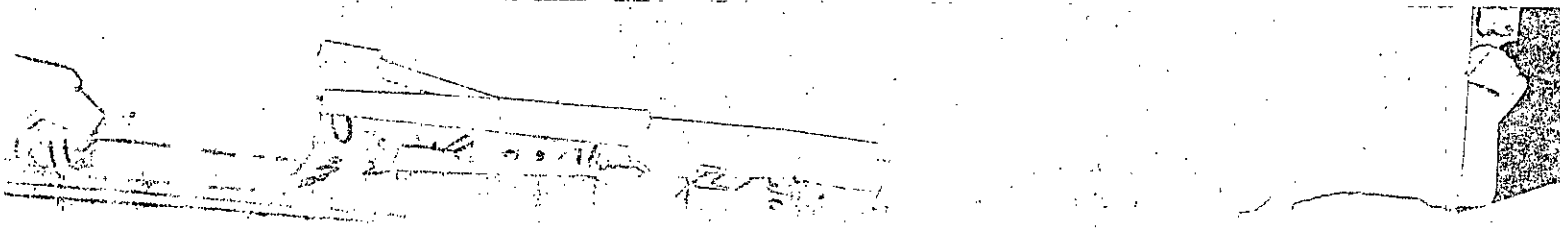
- That he has committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24-06-2016 PS Domel
- 2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations MR. Falak Naz Khan DSP/Saddar is appointed as Enquiry Officer.
- 3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within (17 days) after the receipt of this order.
- 4. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.


 (QASIM ALI KHAN)PSP
 District Police Officer,
 Bannu No.

No-141-4215RC dt. 11.7.2016

Copies to :-

- 1. The Enquiry Officer
- 2. The Accused Officers/Officials.



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

No. 1218 /ST

Dated 18-7- / 2019

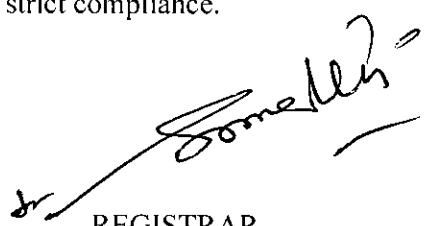
To

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

Subject: - JUDGMENT IN APPEAL NO. 629/2018, MR. AFTAB HUSSAIN.

I am directed to forward herewith a certified copy of Judgement dated 08.07.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

From:- The Regional Police Officer,
Bannu Region, Bannu.

To:- The District Police Officer Bannu.

No:- 2313 /EC dated Bannu, the 07/02/2017.

Subject:- APPEAL.

Memo:- Please refer to your office Memo; No. 2948 dated
17.2.2017.

The Worthy RPO-Bannu Region examined and filed the
subject appeal.

The service Roll and fauji Missal of Ex-Constable Aftab Hussain,
No. 1289 of your district is returned herewith for record.

Service Roll =01
Fauji Missal =01

Regional Police Officer,
Bannu Region, Bannu

عنوان:

اپیل دربارہ بحالی ملازمت بدس وجوہات کی جناب DPO صاحب نے DSP صدر کی انکوائری کی رپورٹ کی اورڈر
میں افری اور یکطرفہ انکوائری کی روشنی میں بحوالہ OB نمبر 56 مورخہ 18.01.2017 ڈسکس فرمایا ہے۔ حکم مذکورہ
وجوہات ذیل غیر قانونی، خلاف روڈ اور سٹاف کی بنیاد پر حقوق ہے۔

جناب عالی۔

گذارش ہے کہ جس کی ذیل عرض رہا ہے۔

یہ کہ مسائل نوایب منظم سہارنہ کے ذریعے بحوالہ مقدمہ نمبر 302 جرم PPC 377 تھانہ ڈوبیل پھنسا یا جا کر چارج شیٹ
کر کے DSP صدر جو کہ متذکرہ سہارنہ کا حصہ تھا کو انکوائری آفیسر مقرر کر کے جس نے مجھے نے بغیر ایک فریضی کاروائی کے تیار
مقدمہ تیار کر دیا۔ بالا کے مقدمہ کا اظہار کے بغیر محض نوایب پر جرم کا مقدمہ دئے بغیر گنہگار ٹھہرایا۔ جو کہ روڈ قانون، بنیاد پر
نظریہ انصاف کے سمانی تھا۔

بعد میں جناب DPO صاحب نے متذکرہ رپورٹ کی روشنی میں مجھے Personal hearing کا موقع دئے بغیر کسی کو
مقررہ سنی و سنی قانون، روڈ کا ہے۔

یہ کہ مقدمہ میں زیر سماعت ہے۔ اور مسائل نوایب نے گنہگار ثابت کرنے کا پورا پورا یقین ہے۔

یہ کہ مقدمہ میں نوایب منظم سہارنہ کے ذریعے تیار ہونے والے کے ڈاکٹر ٹیک پھنسا یا گیا۔ اور
مقدمہ میں اس عدالت میں اس سہارنہ سے پرہیز میں کامیاب ہو سکے گا۔

لیڈ اسٹندنا ہے کہ بالا وجوہات کے پیش نظر منظم متذکرہ کو کارکن مقرر دئے ہوئے انکوائری متذکرہ کو ڈیوٹی کر کے
مقدمہ چلنے دینے کا حکم صادر فرماویں۔ کیونکہ مسائل ٹیل میں ہے اور مقدمہ زیر سماعت ہے بدیں وجہ ایک وقت دو خلاف فورسز پر
تعمیر صورت کرنے میں انتہائی دشواری کا سامنا ہے۔



Ex. کنشیل ایڈجسٹریشن نمبر 1289

ذریعہ
No 496 / RCDt = 6/2/2017
EC/Insr. legal
Get report/ comments
from D/O Bannu

Naam
RRO Bannu Region
05/2/2017

keeping in view the
gravity of the offence
by ex Constable Haid
Husain 1289 the
constant appeal is filed
Chauhan
13/4

14.40

P.T.O



377/502
15AA-34

20/10/57

ASIO

- (1) Yes, anal intercourse has been done
- (2) Yes, signs of entrance i. anal canal like redness scratches are present
- (3) Yes, present

Apart from this Anal Swabs taken, sealed and signed and handed over to police for forensic laboratory analysis.

Mr. Superintendent 24/6/16
RHC Dornal 2.40 PM
Buss.

صالح بنون

حکایت در حوض کفر صبر

بدر بیداد ظاہر اللہ ولد رشید خان تہ سیدہ طویل صبر اللہ خان
کا شوق بیہ لہر 12/13 سال

نیا آمد 1 آفتاب حسن ولد رشید خان تہ سیدہ طویل صبر اللہ خان

2 صنم اللہ خان ولد رشید اللہ خان

3 ظاہر اللہ ولد رشید خان

خدمت ضابطہ ڈاکٹر صاحب سے 14 سوال جواب

کیا دربار کفر نہ دیتے کہ عمار ظاہر اللہ ماہی نے اپنے ساتھی
کو وضع فرمایا (وینا) بیان کیے۔ دربار ماہی نے یہ ضابطہ
کیش فرمایا 6442 کوئی مدعا اس کے کیش میں موجود ہے
دل دیتے سے شکور فرمایا جاوے

95401P510

6/2/16

1 کیا عمار ظاہر اللہ صاحب کو 2 سالہ خلاف وضع فرمایا جائے یا نہیں

2 کیا صفول کے عقد کے اندر دفعول یعنی سے جائے

3 کیا صفول کے عقد کے اولع شرائشا سے جائے

(P+0)

دو افراد سے مل کر لیا گیا ہے

377/506 [24-6-16] 302
15AH-34

یہاں سے آگیا۔ میں دو افراد سے مل کر لیا گیا ہے

(2) فوٹو ایچ ایم ڈی کے ساتھ ساتھ

(3) فوٹو ایچ ایم ڈی کے ساتھ ساتھ

طریقہ سے - ڈی ایچ ایم ڈی کے ساتھ ساتھ

میں سے مل کر لیا گیا ہے۔ میں دو افراد سے مل کر لیا گیا ہے

یہاں سے مل کر لیا گیا ہے۔ میں دو افراد سے مل کر لیا گیا ہے

میں سے مل کر لیا گیا ہے۔ میں دو افراد سے مل کر لیا گیا ہے

یہاں سے مل کر لیا گیا ہے۔ میں دو افراد سے مل کر لیا گیا ہے

یہاں سے مل کر لیا گیا ہے

(2) میں سے مل کر لیا گیا ہے

یہاں سے مل کر لیا گیا ہے

Ans:

(1) All The above
Three persons are
capable of sexual
intercourse

151/101/101
24-6-16

(2) Abscissions on glans penis
of all the three persons
are there. External urethral swabs
taken separately from the above three persons
handed over to police for Forensic Lab Analysis.

5:15 PM

Dr. Saifullah
FHC Darnal
Bani 24/6/16

یہ گفتہ سب سے پہلے کارپورک درجہ 6 نامہ ہو کر پھر حلقہ سنائی دیکھا گئی صوبہ رپورٹ کو درست
 دیا گیا اتنی شناخت کیا گیا کہ کھیل میں کھیلے گئے تھے ہوں بلکہ انماہ قسینا کے حلقہ سے
 یہ یورپ سے الجھنیں کا پیشہ چھٹی متذکرہ نامہ پھر عدلیہ میں رپورٹ سے حالت واپس
 واپس صبرم بالہ کی ناگہی خانی ہے مفعول طالعہ کا لفظ ہے علیہ عدلیہ میں لکھے گئے ہیں حفاظت میں
 پھر فی ڈاکٹری ملد نظر ہے PHC ہسپتال ڈیویژن میں بھرا یا جانے پر یہ کہ سال جو جو نکالے نامہ کو حسب ضابطہ
 مندرجہ ذیل کے سرسلسلہ رپورٹ لکھنی گئی تھی مقدمہ نمٹنے پر سب کا مشیل اسلم ایڈ آرسل کے نام سے میں
 میں وقوع پر موجود ہیں نمٹنے کی حوالے دستہ آئیڈیٹی سرار علیاہ خان سے PHC ڈیویژن 24/6 کارڈ کی
 نمائندگی میں سرسلسلہ لکھی جائے بحرائم نامہ حاکم ہو کر مفعول FIR میں آرڈر نمٹنے کے حوالے BBI سے ملے ہیں
 یہ جسے گزارش ہے

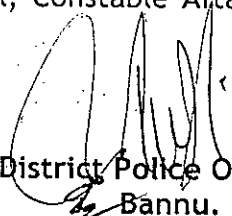
MHC DOMET
 24/6/2016

7

ORDER:

377 Due to involvement in case vide FIR No. 302 dated 24-06-2016 u/s
377/506/15AA/34 PPC Police Station Domel, Constable Aftab Hussain No.1289
is hereby placed under suspension.

OB No. 491
Dated 01/10/2016.


District Police Officer,
Bannu.

No. 11767-68 /dated
Copies to:

1/7 /2016


1. DSP/HQrs.
2. Pay Officer,
3. OASI
4. SRC

(3)

CHARGE SHEET:

I, QASIM ALI KHAN, District Police Officer, Bannu, as competent authority, hereby charge you, Constable Aftab Hussain No. 1289 as follows:-

- That you have committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24-06-2016 PS Domel
2. By reason of the above you appear to be guilty of misconduct under the police Rules 1975 (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
3. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.
4. Your written defense, if any, should reach to the Enquiry Officer 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 be taken against you.
5. You are directed to intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.


(QASIM ALI KHAN)PSP
District Police Officer,
Bannu.


(5)

STATEMENT OF ALLEGATIONS:

I, QASIM ALI KHAN, District Police Officer, Bannu as competent authority, am of the opinion that Constable Aftab Hussain No. 1289 has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of police rules (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014).

SUMMARY OF ALLEGATIONS:

- That he has committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No.302 dated 24-06-2016 PS Domel
2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations MR. Falak Naz Khan DSP/Saddar is appointed as Enquiry Officer.
3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within (17 days) after the receipt of this order.
4. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.


(QASIM ALI KHAN) PSP
District Police Officer,
Bannu No.

No-141-42 ISRC

dt. 11-7-2016

Copies to :-

1. The Enquiry Officer
2. The Accused Officers/Officials.

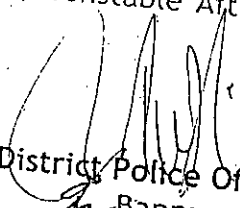
تاریخ 12/13/16
مقامی پولیس آفس بھٹی
مقامی پولیس آفس بھٹی

(4)

ORDER:

377 Due to involvement in case vide FIR No. 302 dated 24-06-2016 u/s
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is hereby placed under suspension.

OB No. 491
Dated 01/10/2016.


District Police Officer,
Bannu.

No. 11767-68 dated

1/7 2016

Copies to:

1. DSP/HQrs.
2. Pay Officer,
3. OASI.
4. SRC

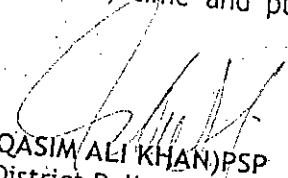
(3)

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I, QASIM ALI KHAN, District Police Officer, Bannu as competent authority, am of the opinion that Constable Aftab Hussain No. 1289 has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of police rules (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014).

SUMMARY OF ALLEGATIONS:

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3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within (17 days) after the receipt of this order.
4. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.


(QASIM ALI KHAN)PSP
District Police Officer,
Bannu No.


No. 141-4215RC
dt. 11-7-2016
Copies to :-

1. The Enquiry Officer
2. The Accused Officers/Officials.

CHARGE SHEET:

I, QASIM ALI KHAN, District Police Officer, Bannu, as competent authority, hereby charge you, Constable Aftab Hussain No. 1289 as follows:-

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5. You are directed to intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.


(QASIM ALI KHAN)PSP
District Police Officer,
Bannu.

ضلع بنوں

①

DSP صدر سرکل

نمبر: 193/5 مورخہ: 14/06/2016

انکوائری رپورٹ

ازان کنسٹیبل اقبال حسین نمبر 1289 متعینہ پولیس لائن بنوں۔

جناب عالی!

بحوالہ مشمولہ چارج شیٹ نمبر 141-42/SRC مورخہ 11.07.2016 مجاریہ جناب ڈسٹرکٹ پولیس آفیسر صاحب بنوں معروض خدمت ہوں۔ کہ الزام علیہ کنسٹیبل مقدمہ علت 302 مورخہ 24.06.2016 جرم PPC 377-506-16AA-34 تھانہ ڈومیل میں حسب ضابطہ گرفتار ہو کر چالان عدالت کیا گیا ہے۔ اور تاحال سنٹرل جیل بنوں میں ہے۔ جبکہ بحوالہ آرڈر بک نمبر 491 مورخہ 01.07.2016 میں نوچا ہے۔

جناب عالی!

میڈیکل رپورٹ کے مطابق بھی کسٹم لڑکے سے زیادتی کا مرتکب اور تفتیش سے گناہ گار پایا گیا ہے۔ ایسے افراد کا محکمہ میں رہنا محکمے کی بدنامی اور ہیومن رائٹس کی خلاف ورزی بھی ہے۔ (Major Punishment) دینے کی سفارش کی جاتی ہے۔ رپورٹ عرض ہے۔

فلک نواز بگوش
ڈی ایس پی صدر سرکل بنوں

*He is dismissed
from service
17/11*

ORDER:

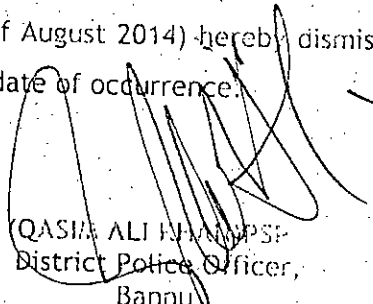
This order of the undersigned will dispose of the departmental proceeding initiated against accused Officials Constable Aftab Hussain No. 1289 under general proceeding of police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) for committing the following commissions/omissions:-

- That he has committed gross misconduct by perpetrating the act under section 377/506/15AA/34 PPC as evident from case vide FIR No. 302 dated 24-06-2016 PS Domel.

DSP Saddar, Bannu conducted proper departmental enquiry into the above charges and submitted his findings vide his office memo No.193 dated 03.11.2016, wherein, the accused constable has held guilty of the charges and recommended for major punishment.

In light of the departmental proceeding I, QASIM ALI KHAN, District Police Officer, Bannu in exercise of the power vested in me under police rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No. 27th of August 2014) hereby dismiss the accused Constable Aftab Hussain No. 1289 from the date of occurrence.

OB No. 56
Dated: 18/11/2017.


QASIM ALI KHAN PSP
District Police Officer,
Bannu.

No. 1109-12 /SRC dated Bannu, the 20-1 /2017

Copies for necessary action to:

1. The DSP/Saddar, Bannu for favour of information with reference to his office Memo: No.193 dated 03.11.2016.
2. The Pay Officer, Bannu.
3. The OASI, DPO Office, Bannu along with the enquiry file for placing it in the Fuji Missal of concerned officials.

V ✓
C ✓
P ✓
PS ✓
L ✓
Y ✓

Jas

ابتدائی اطلاع رپورٹ

کوٹہ

(فائل) ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ فوجداری

52

میل

تاریخ و وقت وقوع

302

1	تاریخ و وقت رپورٹ	16-8-56
2	ناک و سکونت اطلاع دہندہ و مستغنیث	ٹاڈوٹا دلہر تھانہ سیکٹہ فوری سلا میں خاں صاحب
3	مختصر کیفیت جرم (معد ذلہ) حال اگر کچھ لیا گیا ہو۔	377-506 159A-34
4	جائے وقوعہ فاصلہ تھانہ سے اور سمت	اوشیروان دہر تھانہ فاصلہ 13 میل شمال مغرب
5	ناک و سکونت ملزم	ساکان لڈی خانہ
6	کارروائی جو تحقیق سے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وہ بیان کرے۔	سید آغا دلہر تھانہ
7	تھانہ سے روانگی کی تاریخ و وقت	16-8-56

مذکورہ بالا واقعہ کے متعلق ملزم کے خلاف مقدمہ نمٹانے کے لئے تھانہ سیکٹہ فوری سلا میں ایک ایف آئی آر درج کیا گیا ہے جس کے تحت ملزم کے خلاف مقدمہ چلایا گیا ہے۔ ملزم کے خلاف مقدمہ نمٹانے کے لئے تھانہ سیکٹہ فوری سلا میں ایک ایف آئی آر درج کیا گیا ہے جس کے تحت ملزم کے خلاف مقدمہ چلایا گیا ہے۔

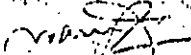
ملزم کا نام ساکان لڈی خانہ ہے۔ اس کا پتہ تھانہ سیکٹہ فوری سلا میں ہے۔ اس کے خلاف مقدمہ نمٹانے کے لئے تھانہ سیکٹہ فوری سلا میں ایک ایف آئی آر درج کیا گیا ہے جس کے تحت ملزم کے خلاف مقدمہ چلایا گیا ہے۔

ملزم نے اس واقعہ میں شرکت کی ہے۔ اس کے خلاف مقدمہ نمٹانے کے لئے تھانہ سیکٹہ فوری سلا میں ایک ایف آئی آر درج کیا گیا ہے جس کے تحت ملزم کے خلاف مقدمہ چلایا گیا ہے۔

ملزم کے خلاف مقدمہ نمٹانے کے لئے تھانہ سیکٹہ فوری سلا میں ایک ایف آئی آر درج کیا گیا ہے جس کے تحت ملزم کے خلاف مقدمہ چلایا گیا ہے۔

DPO Kalka

ارسال کا نام میں درج ہے جو وہ ہے۔ لکھنؤ میں جا کر ڈیڑھ گھنٹہ کے بعد اطلاع دیا کہ وہ 16/5/16 کو
کے دوران قتل کیے گئے۔ اس کے بعد اس کے ساتھ لاکھ پور کے قتل کی اطلاع دی گئی۔ اس کے بعد
سارے کے ساتھ ہیں۔ یہ سب کے ساتھ ہیں۔


17112/5076EL
24/5/2016



OFFICE OF THE
SUPERINTENDENT OF POLICE,
INVESTIGATION, BANNU.



Phone No: 0928-9270178.

Fax No: 0928-9070141

No. 3046 /

Dated: 27 /06/2016.

To: The District Police Officer, Bannu.

Subject: CASE FIR NO. 302 DATED 24.06.2016 U/S 377/506/15AA
PPC PS DOMEL, BANNU.

Memo:

It is submitted that constable Aftab Hussain No. 1289 s/o Nowsherwan r/o Landhi Jhalander, Tehsil & District Bannu presently serving under your kind control has been charged in the subject case. The said accused has been arrested accordingly and sent to judicial lock at Central Prison, Bannu.

A copy of FIR is submitted herewith for favor of further departmental proceedings please.


Superintendent of Police,
Investigation, Bannu.

No: /

Copy to the I/C Investigation, PS Domel, Bannu for information w/r to his application dated 26.06.2016.


Superintendent of Police,
Investigation, Bannu.

ERC/0081

for further info

Muhammad

DPO/BANNU

28/6/16