	,	
S.No.	Date of	Order or other proceedings with signature of judge or Magistrate
	order	
- 1	proceedings 2	3
<u> </u>	4	Khyber Pakhtunkhwa Service Tribunal Peshawar
		Knyber Fakhtanknya bervice Thounar Feshawar
		Appeal No. 168/2014
		Asghar Ali Shah-vs- Provincial Police Officer (IGP), KPK Central Police
		Office, Peshawar etc.
	Ì	
	21.05.2015	ABDUL LATIF, MEMBER:- Counsel for the appellant (Mr. Syed
	,	Zafar Abbas Zaidi, Advocate and Mr. Farman Ullah Khattak, Advocate),
		and Mr. Muhammad Jan, GP for the respondents present.
		and with within and sun, of for the respondents present.
		2. The instant appeal has been filed by Mr. Asghar Ali Shah, Ex-Sub
		Inspector under Section-4 of the Khyber Pakhtunkhwa Service Tribunal
		Act-1974 against the order dated 09.12.2013 whereby he was awarded
		major penalty of compulsory retirement from service and against order
	7	dated 13.01.2014 whereby his departmental appeal was dismissed.
	C' .	
	1	3. Brief facts of the case are that the appellant was appointed as
		constable in they year 1998 and later on appointed as ASI on the
	(7)	
		recommendation of the Public Service Commission on 26.12.2006. That
		the appellant performed his duties with devotion and awarded
		commendation in recognition of his good performance from many Officers
		and good PER's. That appellant was proceeded against on 18.10.2013 and
		charge sheet and statement of allegations were issued to him which
		contained baseless allegations of corruption, ill reputation and cheap
		popularity. Enquiry was conducted by SDPO Circle Parwa who exonerated
		him from the charges of corruption but the competent authority imposed on
		him the penalty of compulsory retirement from service vide impugned
		order dated 09.12.2013. He preferred departmental appeal against the order
	•	of penalty which was rejected on 13.01.2014, hence the instant service
		appeal before this Service Tribunal.
		4. The learned counsel for the appellant argued that the appellant was
		not treated in accordance with law. He stated that charges leveled in the
		charge sheet were not specific, those were baseless and based on malafide.
		The Enquiry Officer did not collect any evidence in support of any of the
		charge. No witnesses against the appellant were examined nor was the
		appellant allowed to cross examine the witnesses, if any. The appellant was
		cursed for achievement as SHO for the short stint of 174 days which were
		duly highlighted by the press media which the Enquiry Officer dubbedias
I	<u> </u>	

cheap popularity. He earned a number of commendation certificates and got good gradings in the Annual Performance Report. The findings of enquiry in respect of corruption could not be proved while findings in respect of the other two charges were based on conjectures and surmises which had not weight in the eyes of law. He prayed that the appeal may be accepted and the impugned orders may be set aside.

- 5. The learned Government Pleader resisted the arguments of the counsel for the appellant. He stated that proper enquiry was conducted charge sheet, statement of allegations were served upon the appellant and full opportunity of defense was provided to the appellant. He stated that the appellant instead of properly responding to the charge sheet, resorted to litigation through writ petition which tantamount to misconduct on his part. He stated that charge of ill-reputation and cheap popularity were proved against the appellant and prayed that the appeal may be dismissed being devoid of any merits.
- 6. Arguments of the learned counsels for the parties heard and record perused with their assistance.
- 7. From perusal of record it transpired that charges leveled against the appellant were not specific. The enquiry report exonerated the appellant of the charge of corruption but concluded the other two charges of ill reputation and cheap popularity as proved without substantiating the same through tangible evidence. Those findings are also in contradiction to the commendation certificate and good performance evaluation reports earned by the appellant, hence a question mark over the credibility of the enquiry report. The Tribunal is therefore inclined to interfere in the case by setting aside the impugned orders of compulsory retirement. The appellant is reinstated in service and the respondents are directed to conduct de-novo enquiry strictly in accordance with law within one month. The question of back benefits will be decided subject to outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCEL

(PIR BAKHSH SHAH) **MEMBER**

(ABDUL LATIF)

MEMBER

09.04.2015

Appellant with counsel and Mr. Nazir Ahmad, Head Constable alongwith Muhammad Jan G.P for respondents present. Arguments partly heard.

It transpired that no inquiry report is available on the file despite the fact that inquiry was conducted. Representative of respondentdepartment is directed to produce inquiry report dated 7.12.2013. To come up for record and further arguments on 21.5.2015.

MEMBER

MEMBER

21.11.2014

震

Appellant in person and Mr. Muhammad Bilal, Head Constable on behalf of respondents with Mr. Muhammad Adeel Butt, AAB present. The Tribunal is incomplete. To come up for written reply/comments on 15.01.2015.

Reader

7. 15.01.2015

Appellant in person and Mr. Muhammad Bilal, H.C alongwith Sr. GP for respondents present. Written reply submitted. To come up for rejoinder and final hearing/arguments before D.B on 02.07.2015.

Chairman

8. 30.01.2015

Notices be issued to the parties for arguments before D.B for 17.4.2015 instead of 2.07.2015.

Chairman

16.3.2015

Vide order sheet dated 5.3.2015, in Service Appeal No. 163/2014, this appeal is also clubbed with the aforementioned appeal. To come up for rejoinder and arguments on 09.4.2015 instead of 1.7.4.2015. Notices be issued to the parties.

MEMBER

MEMBER

Appeal No. 168/2014 Ma Afglian Ali Thousand alongwith counsel present. Preliminary

29.04.2014

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appeal.

Appellant arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned order dated 09.12.2013 vide which the appellant was awarded major punishment of compulsory retirement against which he filed departmental appeal which was also turned down vide order dated 13.01.2014, hence the instant

Since the matter pertaining to terms and condition of services of a Civil Servant and the appeal filed by the appellant is well within time, hence admit for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 10.07.2014.

This case be put before the Final Bench_

) for further proceedings.

10.7.2014

Appellant in person and Mr. Nazir Ahmad, ASI on behalf of respondents with Mr. Usman Ghani, Sr. GP present. Written reply has not been received, and request for further time made on behalf of the respondents. To come up for written reply/comments on 21.11.2014.

08.04.2014

Counsel for the appellant present and requested for adjournment due to general strike of the Bar. To come up for

preliminary hearing on 29.04.2014

Wember

Form- A FORM OF ORDER SHEET

Court of	
Case No	168/2014

	Case No	168/2014
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	12/02/2014	The appeal of Mr. Asghar Ali Shah presented today by Mr. Muhammad Ismail Alizai Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.
2	21-2-2014	REGISTRAR This case is entrusted to Primary Bench for preliminary
		hearing to be put up there on 8-4-20/4.
		CHAIRMAN
	,	
i		

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR Service Appeal No._

Asghar Ali Shah, Ex-SI No. 51/D.

Appellant.

Versus

Provincial Police Officer, KPK, and others.

Respondents.

Service Appeal

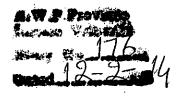
S.No.	Description of Documents	Annexure	Page(s).
	•		
1.	Petition with Grounds of Appeal & affidavit.		(02-16)
2.	Copy of Posting Order.	A	(07)
3.	Copies of Sus: Order, Charge-sheet & reply.	В & С	(28-48)
4.	Copy of Order Dtd. 9.12.2013	D	(44-453)
5.	Copies of Deptt: Appeal & Order 13.1.2014.	E & F	(46-50)
5.	Vakalat-Nama		(-51)
			-

Dated:/0, 2.2014.

(Asghar Ali Shah) Appellant Through Counsel

(Muhammad Ismail Alizai)
Advocate High Court, DIKhan.
Muhammad Ismail Alizai
Advocate High Court
Dora Ismail Khan

Asghar Ali Shah, Ex-Sub Inspector, No.51/D Presently, Syed Manzil, Madina Colony. Dera Ismail Khan.



(Appellant)

<u>Versus</u>

- 1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa, Central Police Office, Peshawar.
- 2. Deputy Inspector General of Police, Dera Ismail Khan Range, D.I.Khan.
- 3. District Police Officer, D.I.Khan.

(Respondents)

Note: The address given above are sufficient for the purpose of service.

APPEAL u/s 4 OF KPK SERVICE TRIBUNAL ACT-1974 AGAIST, FIRSTLY, ORDER OF DPO/D.1.KHAN DTD 9.12.2013 WHEREBY THE APPELLANT WAS AWARDED PUNISHMENT OF COMPULSORY RETIREMENT, AND LASTLY, AGAINST FINAL ORDER ISSUED VIDE ENDS: No. 137/ ES DATED 13.01.2014, WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT WAS DISMISSED.

Respectfully Sheweth: -

The appellant very humbly submits as under: -

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BRIEF FACTS:

- 1. That the appellant joined Police Department during 1998 as Constable, later having been declared successful in erstwhile examination held under Provincial Public Service Commission, KPK was appointed as Assistant Sub Inspector effective 26.12.2006. The appellant was last serving as Liaison Officer, D.I.Khan effective 27.9.2013 vide Office Order No.22235-66 of even date issued from office of Respondent No.3. Copy placed herewith as Annex-A.
- 2. That the petitioner has always performed his duties with due diligence, dedication, devotion and commitment to the cause and to the utter satisfaction of superiors. The petitioner has not only earned commendation in recognition of exemplary performance of duties during the entire stretch of protracted service tenure but nothing adverse is placed on his service records nor has his working been reckoned adversely at any time by his superiors who would always be kind to him for being the most obedient junior besides a devoted, hard working, earnest subordinate. The service record of the petitioner is second to none since the petitioner has also been reckoned eligible for grant accelerated promotion by his superiors. The appellant in due course of service earned promotion to the rank of Sub-Inspector while service record of the appellant is otherwise unblemished, clean and devoid of any adverse marking since nothing of the sort has ever been conveyed to the appellant in this respect.
- 3. That during the entire stretch of employment of the appellant there had been no complaint either from the public throughout the length & breadth of the whole district nor had petitioner came to any adverse notice of his superiors. The conduct and good performance exhibited by the petitioner during the entire service was duly acknowledged by the superiors.
- 4. That during Oct: 2013 the petitioner was suspended by DPO/D.I.Khan (Respdt;No.3) for reasons though neither disclosed to, nor comprehendible by the appellant but apparently to gain pleasure of his superiors and bosses to achieve political mileage. Later, a charge-sheet was issued based on ill-founded allegations having neither any substance nor legal sanction. The proceedings culminating in issuance of impugned order passed by District Police Officer, D.I.Khan, awarding punishment of compulsory retirement from service. Copies of Order on suspension, Charge-sheet, its reply by the appellant, including performance reports, commendation certificates, PERs for the relevant period and the impugned initial order of Respondent No.3 are placed herewith as Annexes B,C & D, respectively.
- 5. That appellant thus moved a departmental appeal with the office of DIG, D.I.Khan, challenging the order of DPO on factual as well legal grounds. Although appeal was well founded, the appellate authority failed to grant due relief and converted the dismissed the same with a stroke of pen. Copies

April

- of departmental appeal and impugned final order dated 13.1.2014 are placed herewith as Annexes F & F, respectively.
- 6. That left with no other remedy available to him the appellant approaches this Tribunal for the relief as prayed for on, inter-alia, the following grounds,

Grounds:

- 1. That the orders passed by departmental authorities, impugned hereby, are discriminatory, arbitrary, legally and factually incorrect, utra-vires, void abinitio and militate against the principles of natural justice thus are liable to be set-aside and nullified.
- 2. That the impugned order was passed on unsubstantiated allegations. Neither any evidence was produced or brought on record in support of the charges nor the petitioner was provided any opportunity of making or preferring his defense prior to pronouncement of impugned order.
- 3. That a departmental inquiry ordered into the matter, though at the back of the appellant ended in rebuttal and denial of allegations yet, D.P.O, D.I.Khan (Respdt No.3) chose to decide the fate of the appellant, ordering imposition of most harsh amongst punishments i.e Compulsory Retirement overlooking the law, rules and norms of justice.
- 4. That the appellant is innocent and has been subjected to the penalty for no fault of his but for apparently politically motivated reasons. DPO / D.I.Khan, (Respondent No.3), while ignoring the true facts as had surfaced in the inquiry proceedings besides law & rules on the subject, erred and failed to regulate inquiry proceedings properly.
- 5. That as a matter of record, the appellant has been vexed without any lawful justification, besides any sustainable proof of correctness of allegations contained in the charge-sheet and that too, without affording the appellant any lawful opportunity to defend his cause.
- 6. That the departmental appellate authority, too failed to take stock of the true facts and instead setting aside the order of DPO dismissed the petition of appeal yet again in a harsh manner, erring in application of correct legal provisions and evaluation of facts in true perspective.
- 7. That the appellant has sufficient length of service rendered for the department. While adjudicating in the matter the departmental authorities utterly ignored not only the provisions of law on the point but the rights, too, of the appellant. The appellant was neither afforded with any opportunity of personal audience nor of a fair trial, thus was discriminated being, inter-alia, condemned unheard.

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- 8. That the orders passed by respondents Nos. 2 & 3, as impugned hereby, have infringed the rights and caused grave miscarriage of justice to the appellant without any lawful excuse.
- 9. That while ignoring the rights of the appellant the departmental authorities / respondents utterly failed to adopt a proper procedure hence erred in disposal of the matter in accordance with the law and rules. The impugned orders passed by DPO/D.I.Khan (Respodt: No.3) and DIG/D.I.Khan i.e. (Respondent No.2) thus lack in legal sanction and therefore, are liable to be set aside in the interest of justice.
- 10. That the petition of appeal / appellant is duly supported by law and rules formulated thereunder, besides the affirmation / affidavit annexed hereto.
- 11. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under reference/appeal.
- 12. That the counsel for the appellant may very graciously be allowed to add to the grounds during the course of arguments, if need be.

Prayer:

In view of the fore mentioned submissions, it is very humbly requested that the impugned order dated 9.12.2013 passed by DPO/D.1.Khan and appellate / final order of D.I.G / D.I.Khan issued over No. 137/ES dated 13.1.2014, copy received on 7.2.2014, may, on being declared as illegal, arbitrary. discriminatory, void ab-initio, ineffective and inoperable against the appellant, be very graciously set aside and the petitioner may very kindly be allowed to be re-instated in the rank of Sub Inspector with all back benefits. Grant of any other relief deemed appropriate is solicited, too.

Dated 10.2.2014

Humble Appellant,

(Asghar Ali Shah) Ex-SI No51/D,

Syed Manzil, Madina Colony, Presently,

D.I.Khan.

CHIC # 12101-3187401-9

Through Counsel. 0346-506-3323

(Muhammad Ismail Alizai)

Advocate High Court.

Muhammad Ismail Alizai Advocate High Court Dera Ismail Khan

AFFIDAVIT:

I, Syed Asghar Ali Shah, the appellant, hereby solemnly affirm and declare on oath that contents of the petition are true and correct to the best of my knowledge, belief and per the official records. Also, that nothing is willfully kept or concealed from this Hon`ble Tribunal.

Dated../o. 2. 2014.

(Syed Asghar Ali Shah) Deponent.

Oath Commissioner Commissioner

ORDER

In compliance with the directions issued by Worthy PPO Khyber Pakhlunkhwa vide letter No. 7478-7531/0R dated 28.08.2013 and Worthy RPO DiKhan letter No. 4573-79 dated 28.08.2013 (circular order No. 01/2013 regarding crime scene inspections team). SI Syed Asghar Ali Shah is hereby deployed as Liaison Officer to coordinate/keep close contact with crime scene is special team and Mata Hussain of Inv. Staff already deployed as Liaison Officer by SP/Inv. DIKhan vide his No. 9402-26 dated 13.09.2013. He will report timed to the undersigned on daily basis.

22235-66

01.27-09-2013

Dera Ismail Khan

Copies submitted for favour of information to the:-

- 1. Addl: Inspector General of Police Investigation Khyber Pakhtunkhwa Peshawar.
- 2. Regional Police Officer, Dera Ismail Khan.
- 3. Regional Police Officer, Inv: South Bannu Region Bannu.
- 4. All SDPOs in DIKhan District.
- 5. All Circle Officers Investigation DIKhan.
- மி அள்ளை Police Stational DIKhan.
- 7. Di Syéd Asghar Ali Shah of Police Lines DiKhan.

Cour

District Police Officer, Dera Ismail Khan

⁴uhammad Irmail Alizai Advocate high Court Dera Ismail Khan IN CO

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DROFE

manplianel of directions received vide letter No. 3439-40/ES, dated 22.10.2013 from the office of Regional Police Officer, Dera Ismail Khan, following officers/officials are hereby foces with suspension and closed to Police Lines with immediate effect, pending goodweitelph ceedings against each.

- Inspector Muhammad Yousaf SHO Kulachi.
- 2. Inspector Sana Ullah SHO Conti.
- 3. Inspector Kiloyof Hussom CO/hiv:
- 4. SI Faiz Kateem SHO Draban.
- 5. St Muhammad Imran 5HO Paliarpur,
- 4 -51 Mehammad Nawaz SHO Band Kurai.
- 7. StGholam Kazim Addl: SHO Prova.
- 8. St Abdul Hamid Incharge Traffic Stall
- 4 51 Khalid Mehmeod Inchange Inv: 17/Unigerally
- 10. ASI ToriqSafeem Police Lines DiKhan (alieady juspended)
- 11 St Asghav Ali Shah italice Lines Dikhae.
- 12 SI Sonheer Adors Police Lines DIKhan.
- 13. SI Muhammad Hashim Assi O 15, Chitt.
- 14.51 Alamankhan Police Lines Dikhan .
- 15. HC Soud Ullah No. 155 OASI.
- The LACE INVESTATION OF NO. 1100.
- 17. He Akhtar Murur No. 319 Police Lines Dikhan."
- 19 HC Muhammad Ramzaa No. 1098 TO Traffic Staff.
- 19 Ho Muhammad Akrom No. 1130 TO Traffic Stall.
- 227 Constable Driver Muhammad Aslam No.1774
- 24. HCSaid Khan No. 684 Gunmen

Strict Police Officer, Dera Ismail Khan

rated Dikhan the

2013

Copy of above is submitted a stegional Police Officer Details and Khan for favour of information w/r to his office No. quoted aboxe it is requested that a formal order on initiation of departmental proroadings against officers mentioned at S.No. 1 to 3 alongwith is like of charge sheet/ summary of allegation may kindly be issued in light of provisions of trales, the said officers being of the Rank of

Sirict Police Officer, Dera Ismail Khan

CHARGE SHEET

Where as, I am satisfied that a formal enquiry Contempleted by Khyber-Pakhtunkhwa Police Rules 1975 is necessary and expedient.

That you while serving in Police Department have been involved in the following misconduct:-

- 1. Corruption.
- 2. Ill reputation.
- 3. Inefficiency.

This act on your part amounts to gross misconduct which is punishable under the rules.

AND WHEREAS, I am of the view that the allegation if established would call for a major penalty as sefined in rules-4(i)(B) of the

AND THEREFORE, as required by Police Rules 6(1) of the aforesaid rules, I Mohammad Nisar Ali (PSP) District Police Officer Dera Ismail Khan hereby charges you SI Asghar Ali Shah with the misconduct on the basis of the statement attached to this Charge Sheet.

AND, I, hereby direct you further under rules 6(i)(B) of the said rules to put in written defence with in 7-days of receipt of this Charge Sheet as to why the proposed action should not be taken against you and also state at the same time whether you desire to be heard in person or

AND, in case, your reply is not received within the prescribed period, without sufficient case, it would be presumed that you have no defence to offer and that expert proceeding will be initiated against you.

> District Police Officer, 2 Dera Ismail Khan

> > Wehammad Ismail Alik Advocate High Cou

Gera Ismali Khan

DISCIPLINARY ACTION

1. MOHAMMAD NISAR ALI (PSP), Distric, Police Officer, Dera Ismail there as a competent authority am of the opinion hat you SI Asghar Ali Shah have rendered yourself liable to be proceeded against and committed the following acts/omissions within the meaning of the Shyber Pakhtunkhwa Police Renes 1975.

STATEMENT OF ALLEGATION

That you while serving in Police Department have been involved in the following misconduct:-

- 1. Corruption.
- 2. III reputation.
- Inefficiency.

This act on your part amounts to gross misconduct which is punishable under the rules.

Hence the statement of allegation.

- 2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegation Dellaron Dera Ismail Khan is appointed as enquiry officer to conduct preper departmental enquiry under Police Rules 1975.
- The enquiry officer shall in accordance with the provision of the ordinance, provide reasonable opportunity of the hearing to the accused, record its findings and make, within ten days of the receipt of this order recommendations as to punishment or other appropriate action against the accused.

The accused and a well conversant representative of the department shall join the proceedings on the date time and place fixed by the enquiry officer

> District Police Officer, 9 Dera Ismail Khan

28-10-/2013

No. 25073-74/ Dated DIKhan the

Dera Ismail Khan. The enquiry officer for initiating proceeding against the defaulter under the provision of Khyber Pakhtunkhwa Police Rules 1975. Er quiry papers containing

SI Asghar Ali Shah with the direction to appear before the E.O on the date, time and place fixed by the E.O, for the purpose of enquiry

proceeding.

Wistrict Police Officer, ma lemail Khan

Sammad Ismail All Advocate High Cour Dera Ishtan khan

e?

بيان ازان ا ا اصغر على شاه (D/51) حال معطل بوليس لائن ذيره اساعيل خان

جناب عالی! مشمولہ چارج شیٹ وسٹیٹنٹ آف ایلیگیشن معروض ہوں کہ بندہ پرلگائے جانے والے الزامات بیں کوئی صدافت نہیں ہے۔ بندہ مورخہ 1998-07-18 کوئکمہ پولیس میں بطور کانشیبل بھرتی ہوکراپی احسن کارکردگی کی بدولت مورخہ 2006-12-26 کومقا بلے کے امتحان زیر تحت پبلک سروس کمیشن صوبہ سرحد (KPK) DIK (KPK) رہی ہوگا۔ بدولت مورخہ 2012-12-13 کوسب انسیکٹر (BPS-14) ترتی یاب ہوا۔ اپنی پولیس سروس (تقریبا 15 سال) میں کئی تکھمانہ کورسز (ریکروٹ ، لوئر کلاس ، انٹر میڈیٹ ، اپر کلاس ودیگر پروٹیشنل کورسز) کرنے کے علاوہ مملی طور پر بھی اعلیٰ کارکردگی کا مظاہرہ کیا۔ بندہ محکمہ پولیس میں ذیل ریک میں نوکری کر چکا ہے۔ بالحضوس کانشیبل ڈیوٹی ، کیڈٹ لاء انسٹر کٹر (پولیس ٹریگ کالج ہنگو) A SHO، ASI کے علاوہ اور بطور افسر مہتم می تھانہ بھی

تعینات رباجن کی تفصیل ذیل ہے:

		<u> </u>		1 .
ضلع	تقانه	نوعيت		تمبرشار
. ڈیرہ اساعیل خان	<u>چ</u> ود هوان		S.H.O	1
ۋىرەاسا ^{غى} ل خان	پیالہ(SNK)		S.H.O	2
ژیره اساعیل خان	کلا چی		S.H.O	3
و ژبره اساعیل خان	کژی خیسور		S.H.O	4
	ڈیرہ اساعیل خان ڈیرہ اساعیل خان	چودهوان ڈیرہ اساعیل خان پنیالہ(SNK) ڈیرہ اساعیل خان کلا چی	چودهوان درواساعیل خان پنیاله(SNK) درواساعیل خان کلاچی درواساعیل خان	جودهوان دره اساعيل خان پنياله (SNK) دره اساعيل خان S.H.O کارچی کارچی دره اساعيل خان

<u>عالى قدر! شيمنت آف ايليگيشن ميں بنده پر جوالزامات عائد کئے گئے ہيں وہ حقيقت کے منافی ہیں۔</u>

(Corruption) کریشن

دوران سروس بندہ پر نہ تو تجھی کر پٹ ہونا ثابت ہوااور نہ ہی بندہ کے خلاف کوئی ایسی دستاویزی شہادت (انکوائری رپورٹ/ایف آئی آر) موجود ہے جس کی بنیاد پر بندہ کوکر پٹ گردانا جاسکے۔

(III Reputation) بُری شہرت 🖒

بندہ ڈسپان کا پابنداورافسران بالا کے احکام کے تالع اپ فرائض منصی نہایت جانفشانی اور دیا نداری ہے سرانجام دیے ب یفین رکھتا ہے۔علاوہ ازیں بندہ محکمہ پولیس میں ابتدائی درجے (کانٹیبل) بھرتی ہوکر موجودالوقت' سب انسپکٹر'' تک ترتی یاب ہوا ہے۔ بندہ کے خلاف نہ تو محکمانہ طور پر اور نہ ہی publically مجھی کوئی شرکایت نسبت کریش ، بری شہرت اور ناقص کارکردگی کے حوالے ہے نہ تو کی گئی اور نہ ہی زیرغور ہے۔ اس بابت بندہ کا سروس ریکارڈروزروش کی طرح عیاں ہے۔ سالا نہ رپورٹ ہائے (ACRs) بھی لف قابل ملاحظہ ہیں۔

القص کارکردگی (In-efficiency)

محکمہ پولیس میں کانشیبل بھرتی ہوکرسب انسکیٹر کے رینگ تک پہنچنا اور دوران سروس کلیدی عہدوں پرتعینات رہے۔
سے بندہ کی کارکر دگی پرکھی جاسکتی ہے۔ بحثیت الیں ان کا اوبندہ جہاں جہاں تعینات رہابندہ نے بہتر کارکر دگی کا مظاہرہ کیا۔
بالخصوص برآ مدگی نا جائز اسلحہ وا بمونیشن ومنشیات ،گرفتاری POs ،کاروائی انسدادی ازتشم 106 شن نا
مال مسروقہ ۔ علاوہ ازیں بذریعہ مصالحت کئی ایسے اہم نوعیت کے واقعات این مداخلت اور
مال میں طویل عرصہ سے عداوت کا باعث تھے۔ جملہ امور بارے بندہ کی
مال میں طویل عرصہ سے عداوت کا باعث تھے۔ جملہ امور بارے بندہ کی



جائے تعینا نتول سے پہتہ براری _کی جاسکتی ہے۔

جناب عالی! بندہ نے ہمیشہ موجودہ لاء اینڈ آرڈر کی صورت حال اور دہشت گردا نہ کاروائیوں کے بیش نظر پولیس فورس کا این کی فورس کا این کی مختل ہوں ہوں کا بین کاری) کا مظاہرہ فورس کا این کی ہمتر بنانے اور مورال بلندر کھنے کی کوشش میں effensive policing (جرائت آز ما پولیس کاری) کا مظاہرہ کیا ہے۔ بالحضوص بندہ کے لئے بیہ بات قابلِ فخر ہے کہ بندہ کوایک اچھی شہرت رکھنے کی وجہ ہے " کلا جی " جیسے حساس علاقے میں قانون کی جملداری علاقے میں قانون کی جملداری معلاقے میں قانون کی جملداری اور پولیس رہے قائم کرنا بھی چیلنے تھی ؟

بحسثیت SHO تھانہ چودھوان ازمور نہ 2013-01-01 تا 2013-03-21 تک کی گئی کاروائی کی تفصیل ذیل ہے:

تفصیل برآ مدگی	نمبرشار	تفصیل برآ مدگی	نمبرشار
04عدوپسل مختلف قتم	2	04 عدد کلاشئون	1
02عدد بندوق باره بور	4	01 ضرب داكفل مختلف قتم	3
بھنگ 565 گرام	6	170 عدد كارتوس مختلف قتم	5
<i>پری</i> 1385 گرام	8	01ر پیٹر بارہ بور	7
02PO's	10	01 كالاكوف	9

جبكه

ای طرح بندہ نے بحسثیت SHO تھانہ پنیالہ ازمور ندہ 2013-03-21 تا 2013-05-06 کے دوران اعلی کارگر دگ مظاہرہ کیا۔ادرا لیک دیہاتی تھانہ میں جرائم پیشہ افراد کے خلاف مئوثر کاروائی کرتے ہوئے زیل برآ مدگی تمل میں لائی۔ ہے برآ مدگی ناجائز اسلحہ وایمونیش ہے

كارتوس ہرتتم	رائفل ہرشم	پسطل ہر شتم	بنذوق باره بور	ريپير باره بور	كالاكوف	كلاشنكوف
380	. 02	07	0.4	03	01	03

۲۰۱۵ مرآمدگی نشات وگرفتاری PO's

,	PO's	بھنگ	پرس
	04	1،150 گرام	460 گرام

نوٹ: بحوالہ مقدم نمبر 82 مور ند 13-04-07 جرم 13AO تھانہ SNK میں بدنا م زمانہ اغواء کارڈ کیٹ گروپ "زمانی زمن "کے دست راست افلاطون ولد حقد اوقوم نوروز خیل سکنہ کھتی خیل کو بدوران چھا یہ زنی کلاشنکوف سمیت گرفتار کیا۔

اس طرح بندہ نے بحسیت SHO تھانہ کلا چی از مورخہ 2013-07-20 تا 2013-08-30 کے دوران اعلی کارکردگ مظاہرہ کیا۔اورا یک دیہاتی تھانہ میں جرائم پیشافراد کے خلاف مؤثر کاروائی کرتے ہوئے زیل برآ مدگی تمل میں لائی۔جبکہ

بحسثیت SHO تھانہ کڑی خیبور بھی احسن کارکردگی کامظاہرہ کیا۔

۵ کاروائی ۵

ч	·									
	رگاه ،	<i>U2</i> ,	کارتوس پرنسم	رائفل ہرشم	پسٹل ہرشم	را كٺ لا ئير	ريپڙ باره بور	كالاكون	كاشكوث	
	900 گرام	1705 گرام		11	08	<u>0</u> 1	12	01	02	

♦ كاروائى بابت گرفتارى فرارشده قيدى احوالاتى (وقوعه سيزول جيل ڈيره)

. بحواله مقدمه نمبر 554 مورنته 2013-07-30 جرم 4-365-354-324-302

3/4EXP:7ATA-148-148-149-3/4EXP:7ATA -225A120B-186-148-29 ت پتھانہ جیھاؤنی میں فرارشدہ ذمل کسان کوگرفتار کیا

ا ب احسان الله عرف لا لى ولدعطاءالله توم ليقو ب زئى سكنه كلا چى (مطلوبه بحواله مقدمه 99 مورخه 2001-05-25 جرم 302 ت پ تقانه كلا جى

۲ عمر خان ولدرمضان قوم مشاءز کی سکنهگره گلدا د کلاچی (مطلوبه بحواله مقد منه نمبر 305 مور خه

2012-10-19 جرم 324 ت پتھانہ کلا جی

س رمضان عرف جانی ولدغلام محمد قوم کنیر اسکنه کلاجی (مطلوبه بحواله مقدمه نمبر 133 مورجه

15-07-2005 جرم 302 ت پتمانه کلا جی

باوجود اپنے فرائض منصبی بطریق احسن سرانجام دینے کے بندہ پر کرپشن، بری شہرت ادر ناقص کارکردگی جیسے الزابات لگا کرمعطل کردینا ضرور توجیطلب ہے۔

اگر

افران بالا کے پاس ایسے الزامات کی بابت کوئی شہادت دستیاب ہے۔ تو بندہ ہرفورم پراسکاسا مناکرنے کوئیار ہے۔
عالی قدر ابندہ نے آج تک اپنے فرائض مضبی کی انتجام دہی میں کوتا ہی نہیں برتی اور ایک جرائت آز ما پولیس کاری کے
ذریعے پولیس فورس کے مورال کو بلند کرنے کی کوشش کی ہے۔ بندہ پولیس فورس میں ایک اچھے کارکن کی حیثیت سے جانا جاتا
ہے۔ کیونکہ قانون کی بالا دستی برقر ادر کھنے کیلئے بندہ نے بھی بھی رشوت ، سفارش اور دیگر تا جائز ذرائع کوفو قیت نہیں دی۔ اور
ہمیشہ پولیس فورس کی عزت اور وقار کو برقر ادر کھنے کی کوشش کی ہے۔

الملك

ورج بالاحقائق کی روشن میں استدعاہے کہ شمولہ جارج شیٹ و شیمنٹ آف ایلیکیشن بلامزید کاروائی داخل دفتر فرمایا جاوے۔ بندہ برائے آئندہ مزیدمختاط رہتے ہوئے جناب کا تازیست مشکور وممنون دہے گا۔

جمله ضروری نقول وتعریفی اسناد و کاروائیوں کی تصاویراور بالا افسران کی طرف سے دی جانے والی ACRs کی نقول ہمراہ

لف قابل ملاحظہ ہیں۔جن سے بندہ کی سابقہ پولیس سروس کو پر کھا جا سکتا ہے۔

اكامغراق الماه (D/51) معال معطل بوليس لائن دره اساعيل خان

Muhammad Ismail Alixai Advocate High Court

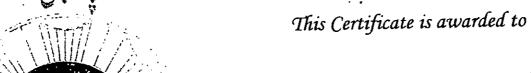




United States Department of Justice.

International Criminal Investigative Training Assistance Program

Islamabad, Pakistan



Syed Asghar Ali Shah

In Recognition of Completion of

Raid Planning/Encounter Course March 5th to March 10th, 2007 Police Training College, Hangu



Shahzad Hamped, Administrative Manager
US Department of Justice/ICITAP/NAS
US Embassy, Islamabad, Pakistan

Pakistan

100



Karl Clark, Deputy Program Manager United States Department of Justice/ICITAP US Embassy, Islamabad, Pakistan



CERTIFICATE ADVANCE POLICE TRAINING 2012

This certificate is awarded to ASI ASGHAR ALI SHAH on successful completion of Advance police training held at Iqbal Fort D I Khan from 9 – 20 Oct 2012. The individual took active part in the training curriculum and has displayed sound level of dedication and keen interest.

Brigadier
Commander 5 Artillery Brigade
(Mansoor Aziz)

S.No. _____



CIVIL DEFENCE DEPARTMENT N.W.F.P.

THIS IS TO CERTIFY THAT

Mr./Miss/Mfs	ASGHAR ALI NO.590	,S/o,D/o,W/oSHABIR ALI	
Nominee of—	Police Department.		
Attended	Civil Defence Lightning Res	strictions Course.	
	D.I.Khan from 12.1.04	toto	— and qualified.

Dated 29.01.2004.

Instructor.

Civil Defence Officer/ Instructor Incharge.

		* 1	
	-		
		\ \/\^\circ	
7.3	1	. 102	
S.N	377	_	





CIVIL DEFENCE DEPARTMENT N.W.F.P.

THIS IS TO CERTIFY THAT,

Mr. Miss/Mrs. Asghar Ali SHAH S/O, D/O, W/O SABIR ALI SHAM
Nominee of Superintendent of Police Dille
Attended Civil DEPENICE MINERON CO
Held at

Dated 27-12-04

Instructor.

Civil Refence Cofficer/ Instructor Incharge,

(19)

>S.No. _____

Dated 21.2.2004.



CIVIL DEFENCE DEPARTMENT N.W.F.P.

THIS IS TO CERTIFY THAT

Mr./Miss/Mrs	SYED ASGHAR ALI SHA	H NO.590,S/o,I)/o,W/o	SYED SABAR ALI	SHAH
	POLICE DEPARTMENT (INVESTIGATION STAFF)			<u>. </u>	<u> </u>
Nominee of	•		·		
Attended	CIVIL DEFENCE CASU	LTY COURSE.			
Held at ———	DIKHAN. from -	6.2.04	to	21.2.04	and qualified.
		maijo		Civil D	Sfence Officer/

Instructor.

Registered No. 757...

GOVERNMENT OF N.-W. F. P.



CIVIL DEFENCE TRAINING CERTIFICATE.

This is to certify that $Mr./M$ is x	S.ASGHAR ALI SHAF
son/dayghter/wife of	NO.590 S.SABIR ALI SHAH,
resident of Police Department	
Division D.I.Khan City D.I.K	han,has
undergone	rtors Course
Advance Course in From 8.12.2003 to	24.12.03 and
has qualified as Member of warde	n
Service Organisation.	

Dated 24.12.2003.
The D.I.Khan.

CIVIL PEFENCE INSTRUCTOR

Civil Defence Officer
Dera Ismail Khan

GOVERNMENT OF PAKISTAN

Regn. No. <u>2K3-NIF -18810</u>

Certificate No. BRC-70-2264

RECTORATE GENERAL CIVIL DESCRIPTION OF THE CASE OF THE



NATIONAL INSTITUTE OF FIRE TECHNOLOGY <u>ISLAMABAD</u>

This is	s to certify that	Syed Asg	har Ali Shah :	s/o Syed Sabir Ali	Shah.		
	(Const:No. 590)	/DIKhan)	Investiga	tion Office, D.I.Khar	1.		
tended		Bom	b Reconnaissanc	e	Course	_ No	70
eld from	25-Aug-2003	to	13-Sep-2003	and qualified.		-	•

Regn.	No.	

Certificate No. 8007-5825

ORATE GENERAL CIVIL DESCRIPTION OF THE COURT OF THE COURT



BOMB DISPOSAL UNIT, **LAHORE**

This is to certify that_	SYED ASCHAR ALI SHAH S/O SYED SABIR ALI SHAH	•
of	DISTT. POLICE OFFICER, D.I.KHAN	
attended	-BOMB DISPOSAL OPERATIONAL TECHNIQUE COURSE	No. 29
held from 8-3-2004	to 27-3-2004 and qualified.	

Dated : 27-3-2004

DIRECTOR TRAINING

UNIT COMMANDER

Registered No. 1233.

DEFENCE DEPARTMENT

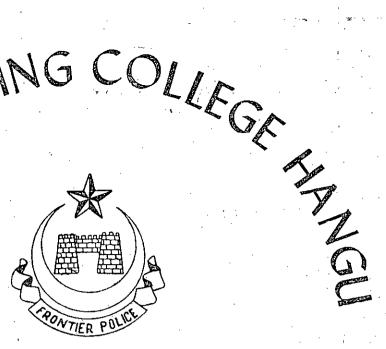
CIVIL DEFENCE TRAINING CERTIFICATE.

This is to certify that A	Ar./Miss/Ma	rs. ASGHER ALI SHAH	
son daughter vife of			
resident of POLICE DEP	ARTMENT (REGU	LAR), Civil	Defence
Division	City	D.I.KHAN	,has
undergonecivil defe	NCE BASIC GE	NERAL COURSE	15
Advance Course in From	17-11-99 to	30-11-99	and
has qualified.			

Dated....30-11-99......

THE ENCE OF ICER

S TRONTI



ESTB - 1935

Certificate of Proficiency

has been awarded to

Asghar Ali Shah 590 of D.I.Khan

for having successfully completed the prescribed 1 month

TEAR GAS TACTICAL & HANDLING COURSE

for the term ending

10th June 2001.

Dated: 1818 200

Commandant PTC HANGU, NWFP.

REFERENCE ATTACHED

Probationer Asstt: Sub Inspector Asghar Ali Shah of this district Police has completed his training from PTC Hangu on 20-June 2007 and has reported their arrival in Police Lines DIKhan

According to Police Rules 19.25 (2) on successfully completing the course at PTC ent 05 July 2007. I langu, he will first complete practical training in district as per detail programme.

COURSE-A

For Hiree months

PROSECUTING INSPECTOR WORKS

- a). Maintaining registers
- b). Checking Challans
- c): Making a Police brief
- d). Working as Asstt: Prosecuting Inspector
- e). Working as Asstt: Prosecuting Inspector in the session court
- f). Personally prosecuting cases

COÙRSE-B

For Six Weeks:

POLICE LINES

- a). Working as Orderly Flead Constables, keeping up files and registers and doing the actual work of the Orderly Head Constable
- b). Reserve Inspector's & Lines Officer's duties doing the actual work.

COURSE-C

For Six Weeks

OFFICE OF SUPERINTENDENT

- a). Working as Asstt: Clerk in English Office
- b). Working as Record Keeper
- ·c). Working as Return Writer
- d). Working as Asstt: Reader to DPO
- e). Working as Asstt: Accountant

COURSE-D

Remaining period

TRAINING AT POLICE STATION

- a). Working as Station Clerk for two months
- b). Assisting in the investigation of cases and learning the duties of officer Incharge of a Police Station under the immediate supervision of the officer Incharge of such a station for a period of six month.
- c). Working as Addl: Investigating Officer in a Police Station for one year, or in the case of an inspector, as Addl: District, City or Reserve Inspector.

This course will last for the remaining period of probation.

On the completion of each course the probationer shall be examined by the DPO who shall satisfy himself that the officer has obtained efficiency before allowing him to commence anothe course, and a concise report regarding the progress made shall be submitted to the Dy: Inspecto General of Police in Part-IV of From 19.25 (5).

Submitted for order please.

FSTT: CLERK

WORTHY DPO/DIKHAN

A-2000 6

ORDER

On completion of PASI course successfully under Police Rules, 19.25 (2) PASI Asghar Ali Shah No.51/D is hereby posted to Legal Branch for Course "A" with immediate effect

> District Police Officer, Oera Ismail Khan

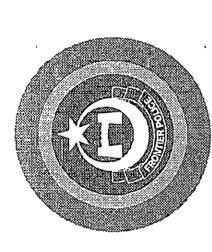
No. 10656 - 57 at 24-7-2007

Copy of above is submitted to the Dy: Inspector General of Police, Region IV. Dera Ismail Khan for favour of information w/r to his office Endsl: No. 1908 9/15, dated 18,7.07, please.

Supdit of Police, InveDIKhan for information.

Derà Ismail Khan

Company of the contract of the



It is certified that Mr. Asghar Ali Shah PASI No. D/51 has completed his probationary "B" Course of Six weeks under my supervision.

During the course he remained very punctual, efficient and take keen interest in official duties regarding Lines Officer/RI & OASI w.e.f 5.11.2007 to 16.12.2007. I am fully satisfied with his performance and feeling great pleasure while issuing his Course Completion Certificate

Attasted

TO A SET OF THE PERSON OF THE

Lines, Officer

が新りに対象し

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OFFICE OF WAY TO BOILED

KHAN

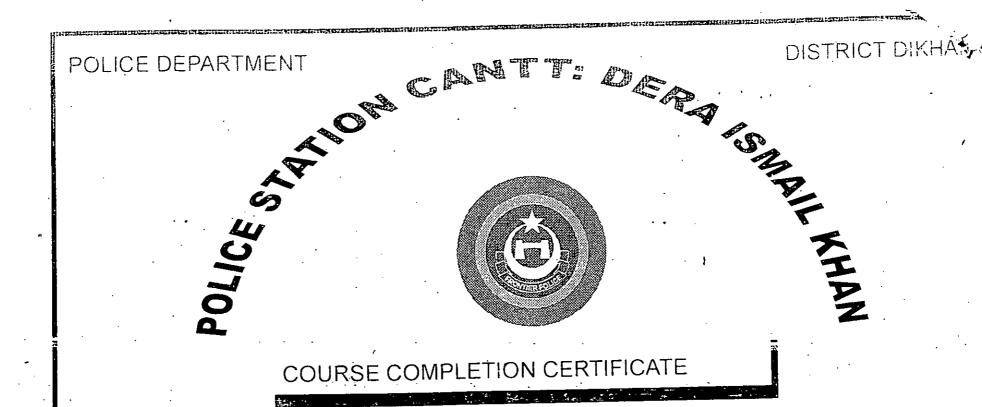
COURSE COMPLETION CERTIFICATE

w.e.f.21.12.07 to 01.02.08 as working Assto Clerk(English Office), Record Kecdar, Returned Writer, It is certified that PASI Syed Asghar Ati Shah No. 51/D has completed his Course "C" for six weeks. Assti: Reader & Assti: Accountant: under my supervision.

During the course he remained very punctual, efficient and take keen interest in rendering his official task assigned to him to the best satisfaction of the undersigned

Attested

Deta tamai vitan



It is certified that PASI Syed Asghar Ali Shah No.51/D has completed his Course "D(a)" for two months w.e.f.013.02.08 to 13.04.08 as Station Clerk under my supervision.

During the course he remained very punctual, efficient and take keen interest in rendering his official task assigned to him to the best satisfaction of the undersigned.

00g

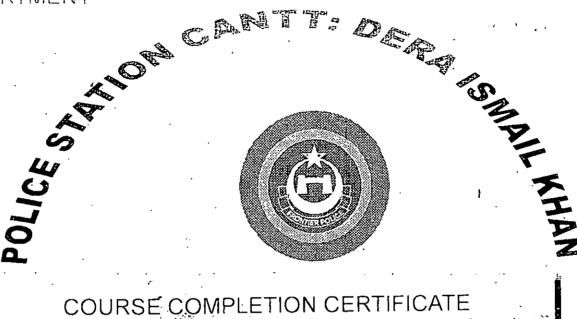
MHC, PS/Cantt: Dera Ismail Khan.

STATION HOUSE OFFICER PS/Cant:, Dera Ismail Khan:...

E)

POLICE DEPARTMENT

DISTRICT DIKHAR



It is certified that PASI Syed Asghar Ali Shah No.51/D has completed his Course "D(b)" for six months w.e.f.13.04.08 to 13.10.08 as Addl: SHO/Investigation cases under my supervision.

During the course he remained very punctual, efficient and take keen interest in rendering his official task assigned to him to the best satisfaction of the undersigned.

Attested

VI SUPOK OF DICE

STATION HOUSE OFFICER
PS/Cantt:, Dera Ismail Khan

DISTRICT DIKHAN POLICE DEPARTMENT



COURSE COMPLETION CERTIFICATE .

It is certified that PASI Syed Asghar Ali Shah No 51/D has completed his Course "D(c)" for one year w.e.f. 13.10.2008 to 13.10.2009, as Addl: Investigation Officer under my supervision. During the course he remained very punctual, efficient and take keen interest in rendering his

official task assigned to him to the best satisfaction of the undersigned.

Attested.



POLICE DEPARTMENT

DISTRICT DERA ISMAIL KHAN

District Police Officer, Dera Ismail Klant

ANNUAL CONFIDENTIAL REPORT ON THE WORKING OF Head Constable,
Asstt: Sub: Inspector SUB INSPECTORS AND INSPECTORS
FOR THE YEAR ENDING-2010

FOR THE Y	YEAR ENDING-2010
Name Provincial or Pauge No. Rank and Grade	ASI Asghar Ali Shah
Where and on what duties employed during the past 12 months	01.01.2010 to 05.01.2010 (Police Lines) 06.01.2010 to 26.07.2010 (PS Prova) 27.07.2010 to 30.09.2010 (Police Lines) 01.10.2010 to Upper Course PTC, Hangu.
Class of District Police Officer's Report, i.e. "A" or "B"	
Is he honest?	a see a contraction of the contr
Remarks by District Rolice officer and Deputy Inspector General of Police Checker Checker Checker Checker Checker (FEROZE SHAH) Dy Inspector General of Police And Dikhan Range Dikhan	OLDI 2010 to 03.03.2016 OMMONDO MICHAEL TO DOTO THE STORY OF THE DOTO THE STORY OF THE PROPERTY OF THE PROPER
	Constitution (Constitution)

(32)

POLICE DEPARTMENT

DISTRICT DERA ISMAIL KHAN

ANNUAL CONFIDENTIAL REPORT ON THE WORKING OF HEAD CONSTABLE,
ASSTT: SUB: INSPECTOR SUB INSPECTORS AND INSPECTORS
FOR THE YEAR ENDING-2011

ASSIT: SUB: INSPECTOR: FOR THE	SUB INSPECTORS AND INSPECTORS YEAR ENDING-2011
Name Provincial or Range No. Rank and Grade	ASI Fazal Rahim 33/D
Where and on what duties employed during the past 12 months	01.01.2011 to 31.3.2011 (Upper Course PTC, Hangu. 01.04.2011 to 10.4.2011 (Police Lines) 11.4.2011 to 18.11.2011 (SHO/Choudwan) 19.11.2011 to 31.12.2011 (SHO/Paroa)
Class of District Police Officer's Report, i.e. "A" or "B"	A
Is he honest?	yes
1. District Police officer and 2. Deputy Inspector General of Police Jeeu	01.03.2011 to 31.12.2011 He is dedicated and convergous Police Officer. (Salah-ud-Din)
(MOHAMMAD IMPIAZ SHAH) PSP/QPM DyInspector General of Police, DIKhan Region DIKhan.	(Salah-ud-Din) Dy: Superintendent of Police, Kulachi Circle, D.I.Khan 02.03.2011 to 02.8.2011

(Muhammad Hirskin)
District Police Officer,
Dera Ismail Khan

02.08.2011 to 31.12.2011

porial officer

(Sohail Khalid) W District Police Officer, Dera Ismail Khan

(33)

POLICE DEPARTMENT

DISTRICT D.I.KHAN

ANNUAL CONFIDENTIAL REPORT ON THE WORKING OF HEAD CONSTABLE, ASSISTANT SUB INSPECTOR, SUB INSPECTOR & INSPECTOR FOR THE YEAR ENDING 01.01.2012 TO 31.12.2012

Name Provincial or Range No. Rank & Grade	ASI/SI Asghar Ali Shah No.51/D
Where and on what duties employed during the past 12 months	(01.01.2012 to 14.04.2012) PS / Paroa (15.04.2012 to 31.12.2012) PS / Yarik
Class of Police Officer's Report, i.e. "A" or "B"	"A"
Is he honest?	No Complaints
Remarks by: - 2. Dy: Inspector General of Police	An efficient, hardworker and obedient Police officer, his Performance nemaiol scilis factoring his posting Revised. (BAHAWAL KHAN) DY: Supdt: Of Police, Circle Paroa DIKhan 01.01.2012 to 14.04,2012 A Profession al Police
(QAZI JAMIL-UR-REHMAN) (P.S.P) DI:INSPECTOR GENERAL OF POLICE DIKHAN RANG D.I.KHAN. 14-02-2013 to 31-12-2013.	(ABDUL HAYEE KHAN) DY: Supdt: Of Police, Circle Saddar DIKhan
	15.042012 to 31.12,2012

(SCHAIL KHALID)
District Police Officer
Dera Ismail Khan
01.01/2012 to 31.12.2012

Police No. 107.

Form No. 15,3 (c)



Capt: (Usman Zakria) OPM/PPM District Police Officer, Dera Isaail Khan.

N.-W. F. P. POLICE.

COMMENDATION CERTIFICATE

Class III

Granted to	CONSTABLE S.AGGHAR ALI NO. 590.	,
son of	, resident of	village,
OFFICE	Police Station, DIKHAN	District,
in recognition	n of FOR HIS PERFORMANCE OF GOOD DUMY & A	NN OLL CWED A
교 역 역 명 분 대	DURING POLICE DARBAR HELD AT POLICE LIN	E DUR ING 2004.
Dated 481	} (WITH CASH REWARD RS. 100/- Supering	the hichiot of Police. Ismail Khan.

Note—(1) If a Police Officer, rank and number in final.
(2) Cash reward if any, to be specified.



Estb 1935

Commendation Certificate II

Cash Reward Rs. 50/- is awarded to

Const: 590 S. Asghar Ali of District D.I.Khan

in recognition of

actively participating in the 'Inter Company Talent Competition'

held on 9th October 1998.

Dated: 4th November 1998

Order Book No. 12 Commandant

Salman Syed Muhammad PM,PSP,DIG.





. उर्तेर्ट ر مانی از است کے مطابق الزشتہ روز تخمہ اپر ہے پہلس ریست بازس وروانا کیل فان بن سەمى تىزىپ كاستماكيامي جس ئىں دى آئى تى دِيرِهِ اسائميل مان ناضي فِميل الرحمان، وْ مَن فِي او وْرِهِ بيل خالداورة ي ن او نا يك فريدالله كي خيل -ا ائیل فان ولیس ب تعلق رسمنے والے انس جوانوں کی ایک تشر تعداد نے شرکت کی - اس آم مقدد بیشدورانداموری بهترین کارکرول دکهاف وال سد پیدوسته روست روست این است. پرلس کم آخر ایکاران کوکلاندر آن دید برسته ان کی خدات کا امر آف کردا تھا۔ تقریب بش جس جس بخش ایکاران دا محلے سکیل عمر ترق دی گامان میں اندمرش طاع عمران خان کنڈی ایس ایچ ادتمانه کزی خیسور ا عَانِ الس الله التاء قان بباز برشال عيد جكه ووجريد عان این این او حاص به این از این المیدود بات اور خافری را ایجاد این دیسا انتشاب اسیدو آرگی داید دو این اور خافری سربان دیسا امیکو اولیسنی کمیشن شاف تجانب پیاوی این سربان بری پر داموش کی تفریمش کردی گی-اس موش پر رِبِي إن والي اخران سه فظاب كرت او ا فِي بِنَ الْمِيهِ عِلَيْهِ مِنْ أَرْضَ كَا لِمِينَا مِنْ اللَّهِ عِلَى اللَّهِ الْوَلِي مُولُولُ اللَّهِ إِنَّ إِنْ مِنْ اللَّهِ مِنْ أَنْهِ مِنْ أَرْضَ كَا أَنْ مِنْ كَالِّذِي مُولُولُ مِنْ مُولُولِ مُولُو مان والى يرومون أس إت مع الطبري كديد الكارا ورحك ہولیس، کے قام اضران اور جوان 'وام کُ خد جذب اورجرام كى عرفى كى صلاحيت سد مال مال يى اور و و فوام سے جان و مال کے تعلظ کے لئے ہیشہ پر از کہ فعال اور ثابت قدم رین کے ۔ تامنی میل الرحمٰن نے قدید ك روميش ل جائے كے جد ان افران ك ذر واربوں میں اشاف و ممیا ہے اور وہ این وس واربول ؟ اوراك كرتي وف الناسط متعاقد عات مرد وس وأ مان و المن علف اور ان علاقول كي واس على جال د لاَن کے توزی کے لئے کوئی وقید فروگر منت نہ مورور میں۔ میروزیں۔ تانبی تیل الرمان نے قرق بانے والے ان انسران کو مبارکراد دیے جوئے کہا کہ آپ کیا دیات زاری، غیر جانبداری اور این پیشه دراندامور شی مبارت بی ایسی کی دردی کراحر ام بنشی کاموجب بن محمق ہے۔





بودهوان پولیس کی کاروائی اشتهاری ملزم عبدالکلام گرفتار

لزم ہے ایک کلاشکوف بمعیمیگزین 10 کارتوس، 510 گرام جین برآ م

چودوان (نامہ نگار) تمانہ چودوان اولیس نے سے مطابق بحرم اشتباری عبدالکام جو کہ 2، 200 ش اشتباری مجرم 302 کے جرم میں مؤت مبدالکام ولد بیلس تمانہ چودوان کو مطاب گزشتہ دوز کو راستہ کڑی عبدار ممن قرم استرائی کڑی شوز کی گرفتار کرایا تفسیلات مستحد مستحد مرکز اجترائیس 25



چدوان: ایس ایج او اصغرشاه اشتهاری ملزم کومیڈیا کے سامنے پیش کردہے ہیں

پید بران پیش میران پیش میران پیش میران بیش میران میران بیش میران میران بیش میران می





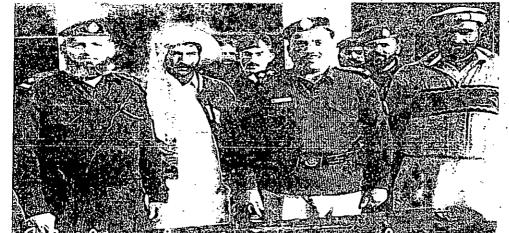




کہ بحثیت S.H.O تھانہ کلا چی وقوع ہنٹرل جیل ڈریرہ کے بعد طِز مان کی گرفتاری واسطے دلیم مڈی الونٹری ، روڑی ورگی موڑ کاروائی ورکی میں کیا گیاسرچ آپریش برآ مدہ اسلحہ وا یمونیشن اور مشتبہ گان کے خلاف کی گئی موثر کاروائی



﴿ مورخه 12:2012 في المرون برايط المنظم (BPS-14) تن ياب مون برساراكات مون D!I.G و في مورخه D.I.G و في المرابط المنظم (BPS-14) تن ياب مون برساراكات مون



ته بحثیت S.H.O تقابد فرور و الدمید میر میرود و 13/1/13 و مرد می 13/40 میرود و این بدنای داند او از کار دار کار دارد و این موزه" منوزه" منوزه" کی دست راست کل زمان عرف گلزاولد سرور قوم نچستری بلوج سکنه جوند کوبد دوران چهاپیزنی کلاشکوف سمیت گرفار کیا



کےخلاف موثر کاروائی کی



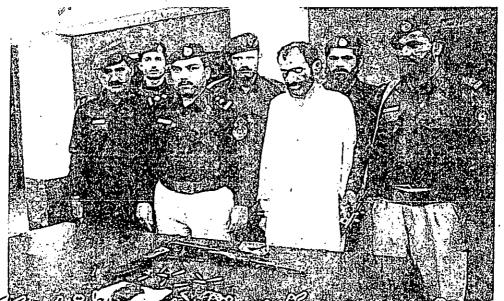
هم بحثیت S.H.O تھانہ پنیالہ (SNK) نجرم اشتہاری سلیمان عرف کا کاولد قیصار قوم جها نبر سكنه بنياله كوبه دوراني جهابيزني كلاشكوف ويسفل سميت كرفتاركيا



ى بىكىيت SiH.O جىڭىيت Si ئىزىكالد (SNK) بحوالد مقدمەنمبر 82 مورخد 7/4/13 جرم 13-AO قاند (SNK) يىلى بددوران چھاپەزنى خطرناك بجرم اشتهارى وفلاعون ولدحقدا دقوم نوروزخيل سكنه كق خيل كوكلاشتكوف سميت كرفآر كيا ندكورة قمل ، اقدام قمل ، ذكييني ، را بزني كي متعدد واردا تول ميس مقامی پولیس کومطلوب تھا،علاوہ ازیں بدنام زمانہ اغواء کاروڈ کیٹ گروپ" زمانی زمن" کا دست راست تھا



﴿ بحثیت ﴿ اللَّهِ عَلَيْهِ جَود ہوان بدنا مِ زمانہ چور، رسہ گیر ''عبدالغفار ولدصو بیلائن و می سکنہ گنڈی عیب کواعلیٰ سل کے گھوڑی چوری کر کے لیجانے پراطلاع ملتے ہیں ہمراہ نفری پولیس ہمراہ مال مسروقہ بحد کوڑی حوت سے گرفتار کیا



﴿ بحثیت 6!H!O تَفَا تَعْبِحُوْدِ وَانْ بِرَنَامِ إِنَّا لَهُ مِنْ الْمُ الْمُ الْمُ اللَّهُ وَلَمْ اللَّهُ الْمُ اللَّهُ وَلَمْ اللَّهُ اللَّهُ وَلَمْ اللَّهُ اللَّهُ اللَّهُ اللَّهُ اللَّهُ وَلَمْ اللَّهُ اللَّلَا اللَّهُ اللَّهُ اللَّهُ اللَّهُ اللَّهُ اللَّهُ اللَّهُ اللَّلَّ



ك بحثيت S.H.O تقاند بنيالد (SNK) يتيز ورو تركون ويم خان ولابهرام خان ويم و خيد ك بكندوا نده تا الى و كالفوت و 50 كاروس بالدون و 13-AO برميت كرفاركيا_ بحاله مقدمه نبر 64 مورند 13-AO برم ما 13-AO تقاند (SNK)



ملز مان رب نواز ولدی نواز ، بدایت الله ولدالله پخش اقوام بھی سکتائے کوڑی حوت ہے بھاری مقدار ش اسلحہ وا یہ وینیش تبتعبیل 2 کلاشکوف، 1 کالاکوف، 1 رپٹیر 12 بور ایک رائفل 303 بور ، ایک بندوق 12 بور ، 6 میگزین اور 94 کارتوس مختلف تھے بر آ ہدیکے، نہ کورین بالا ایک لڑک کو بدز وراغوا م کر کے شادی کرنے جس ملوث تھے برخلاف اش حسب ضابطہ کاروائی عمل جس الانے اعلی تحریفی استاد ہے نواز۔



ہمورخہ 2006 12/2/12/2 بہتام پولیس لائن پھ ورمقا بلے کا امتحان (PSC) انٹیازی حیثیت سے پاس کر کے DIKhan دی ہے ہ P-ASI ہونے پرانس کی جزل پولیس جناب رفعت پاشاتقرری کے کاغذات دے دہے ہیں



من فيد 10/3/2007 بمقام بوليس رينگ كالج بتكون بيار منث أف جسل USA كى جانب سے اعزازى مرفيقكيث سے نوازاجار م

ORDER

This order is aimed to dispose off the departmental proceeding against <u>SI Asghar Ali Shah No. 51/D</u> on the charges of corruption, ill-reputation and inefficiency.

The defaulter Sub Inspector was served with the charge sheet and statement of allegation and an enquiry was conducted into the matter through.

Mr. Aman Ullah Khan DSP Prova DIKhan. The enquiry officer submitted his finding, in which he stated that the defaulter Sub Inspector is found guilty of the charges leveled against him and recommended him for major punishment. The defaulter Sub Inspector was summoned in Orderly Room on 09.12.2013 but he intentionally/deliberately did not appear which shows that he has no defence to offer. The enquiry file/available record was perused and the undersigned came to the conclusion that the charges leveled against him are stand proved.

Therefore, in the light of above, I' Muhammad Nisar Ali (PSP)

District Police Officer DIKhan in exercised of powers conferred upon me under the Police Rules-1975, hereby award him major punishment of compulsory retirement from service with benefits with immediate effect.

District Police Officer,
Dera Ismail Khan

ORDER ANNOUNCED
Dated 09.12.2013

ATTESTE

District Police Offices

292

101 Copyrigo for a secretary 13-12-013

101 Secretary 13-12-013

102 Secretary 13-12-013

103 Secretary 13-12-013

103 Secretary 13-12-013

104 Secretary 13-12-013

105 Secretary 13-12-013

105 Secretary 13-12-013

107 Secretary 13-12-013

1

UP/Mer, de (DPO) - 2/2/10/1/2013 -12-43 a will fligger of is for of inte J-list difford MISChelabille المالي المالك على المالك على مالله المرابي 3/6/0/1/0/1/0/1/ فارون مرازر المراق 2/1/ ji 2/4) = 1/9/1/1/1 المرهان بالأكريزور 12/13 (Troille را الاستان وارسوها وای او ورسد کاری D/51 -(SI) 1/1/2 2/1-163/1/2/30/2/31 For Contid Pl. 0346-506-3323! Lyn, of order may h accorded as per PR 11.6

No 4126/85 dt 27-12-2013

(45) E

بخدمت جَناب عبدالغفور آن آفريدي ويخدمت ويناب عبدالغفور المان الفريدي

جاب عال!

معروش ہوں کہ بندہ کو مورخہ 9/12/2013 کو محکمہ پولیس میں ملازمت بہ عہدہ سب انسیکٹر 14-BPS - "جری ریٹائرڈ" کیا گیا ہے، اور الزامات لگائے گئے ہیں کہ بندہ رشوت خور ہے، اچھی شہرت کا حال نہیں اور نا اہل ہے جن کے بارے عاجزانہ استدعاہے کہ:

ہے۔ بندہ مورخہ 998 17/199 کو محکمہ پولیس میں بطور کانٹیبل جرتی ہوا۔ بعدہ اپنی احسن کارکردگی کی بدولت مورخہ 28/12/2006 کو مقابلے کا امتحان (PSC) پاس کرنے کے بعد ڈیرہ رخ سے بطور 28/12/2018 کو مقابلے کا امتحان (PSC) پاس کرنے کے بعد ڈیرہ رخ سے بطور 28/12/2011 کو بہ عہدہ سب انسپلز ترتی یاب کیا گیا۔ بندہ نے اپنی پولیس سروس تقریبا پندرہ (15) سال اپنے فراکش منصبی نہایت ، دیا نتداری ، جانفٹانی ، خوش اسلو بی اور افسران بالا کے احکام کے تالح سرانجام دیے ہیں۔ اور بالا افسران کو کہمی محکی شکایت کا موقع نہیں دیا ہے۔ اگر بندہ کے خلاف کر پشن کا کوئی الزام تھا۔ تو بندہ کو با قاعدہ انہیں ایام میں منذ کرہ الزام کے کوئی تعین نہیں کیا گیا۔۔۔؟
شیٹ دی جاتی لیکن ان ایام اور الزام کا کوئی تعین نہیں کیا گیا۔۔۔؟

کے بندہ ایک اعلی النسب "سید فیلی "اور صاحب جائیدادگر انے کا چثم و چراغ ہے اور بندے کا تمام خاندان اعلی سرکاری عبدوں پر قائز ہوکرا پی خد مات سرانجام دے رہے ہیں۔ بدیں وجہ بندہ کی مدری و پدری تربیت ہی الی ہوئی ہے کہ بندہ مندرجہ بہ چارت شیٹ بیسٹی تھے افسال کا تصور تک نہیں کرسکتا۔ بندہ نے دوران ملازمت عوام الناس کے ساتھ ایک اچھا ہے ،اور بندہ جہال میں تعییات رہا عوام الناس نے بندہ کی ملازمت اور تعیناتی کوسرا ہاہے ، جہاں تک بندہ کی نااہ کی اور ناتھی کارکر دگی کا تعلق ہے اس بارے میں بندہ کا سروس رکارڈ ، بابت برآ مدگی نا جائز اسلحہ و منشیات ،گرفتاری مجر مان اشتہاری ،اور بالخصوص کاروائی زیر دفعہ ااس ف ، سے صاف عیاں ہے۔ اور اس سلسلہ میں بندہ کے سروس ریکارڈ کو بالکل شامل اعوام کی نہیں کیا گیا ہے۔ حالانکہ بندہ ای سلسلہ میں بندہ کے سروس ریکارڈ کو بالکل شامل اعوام کی نہیں کیا گیا ہے۔ حالانکہ بندہ ای سلسلہ میں بندہ کے سروس ریکارڈ کو بالکل شامل اعوام کی نام و میں موجود ہے۔

جلادورانِ انگوائری اور حکم جبری رینا ترمنٹ میں بندہ کے خلاف عوامی شہادت کا ذکر کیا گیا ہے۔ حالا تکہ بیری وائی مطوعات کے مطابق کسی فخص نے بھی میرے خلاف کوئی شہادت نمیں دی ہے اور جملہ پراسس میں مجھے کسی موڈ پر بھی ندتو شائل انگوائری کیا گیا۔۔ اور ند می کسی الزام کی بابت "جرح" کا موقع دیا گیا۔

(46)

کے بندہ موجودہ وقت میں بہ عہدہ سب انسکٹر بہ مطابق لسٹ "E" پر تھا اور اِس عہدہ تک بیٹنچنے کے لیے خفیہ سالا بندر پورٹیس ACR's اِضران بالاتحریر کرتے ہیں۔جن کی نفول ہمراہ لف قابل ملاحظہ ہیں۔میری کسی رپورٹ میں اعلی افسران کی جانب سے کسی ایک الزام مندرجہ بہ چارج شیٹ کاذکر نہیں ہے۔

بندہ پولیس فورس میں ایک اجھے کارکن کی حقیت ہے جانا جاتا ہے۔ اور بمیشاعلی افسران کے زیرسایے ٹی اہم نوعیت کے معاملات کارسر کار میں اپنی ذمدداریاں جانبر طریقے سے سرانجام دے چکا ہے۔ اس کاوش میں بندہ نے ماضی قریب میں افسران بالا کے تھم پر جناب بی کے دفتر میں بیٹے کر جملہ دہشت گردانہ کاروائیوں ، دہشت گردی کے نیٹ ورکس ، ٹارگٹ کلنگ کی واردا توں ، اور بالخصوص امن وامان کے دفتر میں بیٹے کر جملہ دہشت گردانہ کاروائیوں ، دہشت گردوں کی شاخت ار صدیشن بھی "کے تام سے شب وروز ایک کرے مرتب کی جس سے ایک عام پولیس افسر تک دہشت گردوں کی شاخت اور ان کے معاون و مددگاروں تک رسائی وآگائی کو ایک کر کے مرتب کی جس سے ایک عام پولیس افسر تک دہشت گردوں کی شاخت اور ان کے معاون و مددگاروں تک رسائی وآگائی افسران کے منادیا گیا۔ فسلامی پولیس کی اس کاوش کو جملہ Law Inforcement Agencies نے سرابا۔ اندریں بالاذیل افسران سے بندہ کی کاوش و محنت کی نبیت تسلی کی جا سے بندہ کی کاوش و محنت کی نبیت تسلی کی جا سے ب

(سابقهانسپکر جزل آف پولیس صوبه خیبر پختونخواه) پشاور	ارجناب احمال غنى صاحب
(سابقه دُمْ پِی انسپکر جزل آف پولیس) ڈیرہ	٢_ جناب محملي باباخيل
(سابقه DPO) ژبره	٣- جناب سهيل خالد
(Under Suspensionしん-DIG)	مهمه جناب عبدالغفورخان
(DSP-DSB)	۵_ جناب صلاح الدين خان كنذى
(متعینه دفتر DIG) ژبره	۲_ جناب انسپکرامتیازعلی خان
(ریڈر جناب DIG) ڈیرہ	٤١.٤ مخرصنيف
(کمپیوٹرآ پیریٹر دفتر جنابDIG) ڈیرہ	۸_خرمنواز

جناب عالی! بنده نے جملہ پولیس سروس میں لیے شار پولیس تقریبات ازقتم دربار جناب Dig صاحب ، دربار جناب DPO صاحب، دربار جناب DPO صاحب، ودیگرتقریبات کے انعقاد میں ایک اچھے منتظم ، کمپئیر ، کے فرائض انجام دیئے ہیں ، اور ہمیشہ بالا افسران کے قریب رہ کر ایکھے اخلاق سنوار نے کا موقع ملا۔

(G)

کے بندہ کو چارج شیٹ میں درج الزامات کر پشن، بری شہرت اور ناقص کارکردگی جو کہ جزل نوعیت کے ظاہر کیے سکتال اس بارے بندہ کوکوئی آگا ہی نہیں دی گئ تھی کہ اِس اطلاع یا بی اور الزامات کے خصوصی نوعیت اور Basis کیا ہیں۔

(بندہ نے نفل فائنل رپورٹ ودیگر ضروری کاغذات واسطے استدعا کی لیکن ماسوائے آرڈر جبری ریٹائزمنٹ کے بندہ کودیگر کاغذات عطائمیں ہوئے)

المران بالدکوآگای نہیں دی جہ ہندہ کی سابقہ پولیس سروس اپولیس ورکنگ کے بارے میں افسران بالاکوآگای نہیں دی جہ بندہ کے بارے میں افسران بالاکوآگای نہیں دی جہ بندہ کے بارے میں افسران بالاکوآگای ہائے ۔ کی نہیں کی نہیں ہوئے کہ بندہ کو طلب کر کے ساجائے۔ سابقہ بالاافسران سے بندہ کے "چلن ماہ قبل" کی نبیت باقاعدہ تسلی کی جائے ۔ کی دو نکھ ۔ کی دو نکھ

بندہ کو بلا بھاز جبری ریٹائرمنٹ کے تکم سے سخت وہنی کوفت اور پریشانی لاحق ہوئی ہے۔ حالا اکد بندہ مندرجہ بالانا کردہ گناہ میں اقطی ملوث نہیں تھا۔ کہ اور جاندانی عزت ووقار کو مذفظر رکھتے ہوئے بندہ کے عرصہ ملازمت ،سابقہ سروس ریکارڈ اور خاندانی عزت ووقار کو مذفظر رکھتے ہوئے بندہ کو دوبارہ سابقہ ملازمت برعہدہ سب انسپکڑ BPS-14 پر بحال بندہ کو دوبارہ سابقہ ملازمت برعہدہ سب انسپکڑ BPS-14 پر بحال کرنے کے احکامات صادر فرمائے جائیں۔

بنده بطور کیڈٹ لاءانسٹر کٹر پولیس ٹرینگ کالج منگویں بھی اپنی خدمات سرانجام دے چکاہے۔

نوٹ! بندہ کا سابقہ بیان ، جملہ تعریفی اسناد، نقول AGR's اوراحسن کاروائیوں کے فوٹو گراف ، کیے گئے پر دنیشنل کورسز کی " رئیفکیٹس ودیگر ضروری کاغذات ہمراہ لف قابل ملاحظہ ہیں۔

> Muhammari Ismail Aliza Advecate High Court Dero Kritish Khaza

سفحة نمر 3

ORDER:

This order is meant to dispose off the appeal preferred by Ex-Sub-Inspector Asghar Ali Shah No.51/D of DIKhan District against the order of major punishment i.e. compulsory retirement from service, awarded to him by DPO DIKhan vide order dated 09.12.2013. He was proceeded against on the allegations of ill reputation, corruption and inefficiency. A proper departmental enquiry was initiated and Mr. Aman Ullah Khan, DSP Paroa DIKhan was appointed as Enquiry Officer to conduct proper departmental enquiry against him. On the recommendation of Enquiry Officer DPO DIKhan awarded him major punishment of compulsory retirement from service.

The appellant/ Ex-Sub inspector preferred the instant appeal against the order of DPO DIKhan. I have gone through the enquiry file as well as service record of the appellant and also heard him in person on 02.01.2014.

Therefore in exercise of power conferred upon me I Abdul Ghatoor Afridi Dy: Inspector General of Police DIKhan, in exercise of the powers conferred upon me and being a competent authority find no substance in appeal and hold that DPO has correctly passed this order, therefore, this appeal is dismissed and filed.

Deputy Inspector General of Police, Dera Ismail Khan Region

No.

137 reside: 13-1-14

Copy to the District Police Officer, DIKhan for information with

reference to his office memo: No.31896 dated 31.12.2013, His Service Record

returned herewith.

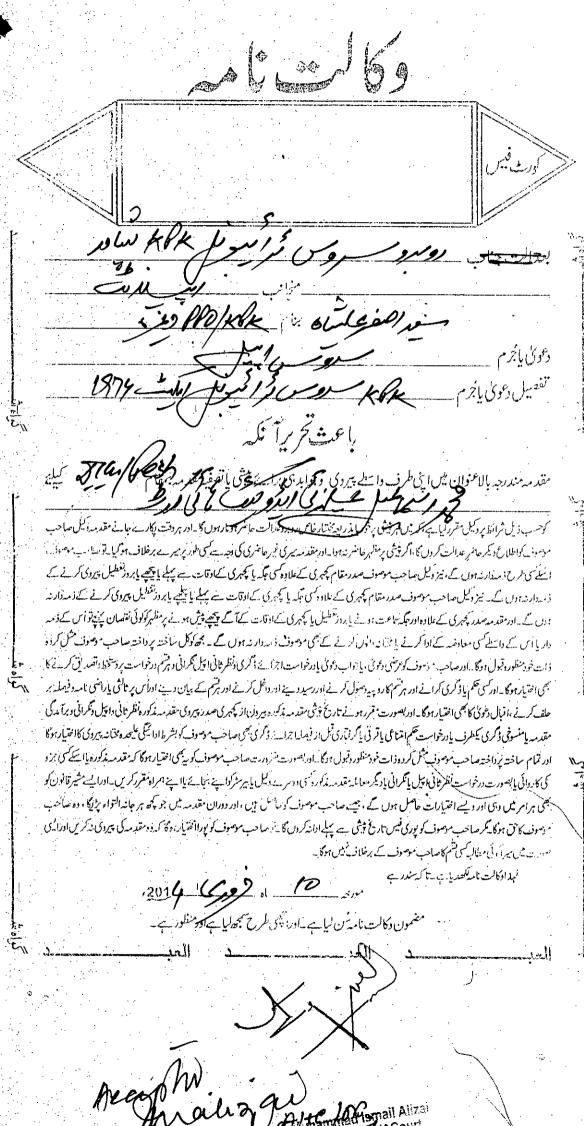
End. S. Record

(ABDUL-CHAFOOR AFRIDI)

Deputy Inspector General of Police. Dera Ismail Khan Region

New West told offor - he was -: Cle lis will for the grate on tack will by the to the first to De 3631-p36/601/60/16-e0D16-60 Justin La 56 on We Sois of A HINSTER Power 02/19/ (100) Eliel1 DAGE Chendot Cheek Elike profit (the of inge 0346-506-3323 0311-011-33323 XIIC # 12-101-13/87 401-9 DSP/Cegent. For Communts Aspa PR 11.63, Copy of order may be allowed pr.

Sir Tarket



معروص بولا مرنده ي روس البال جوالي محالي عنوان المنزعلي تا 0 منام مرودند يول أفر ٢٠٩١ ها الجون ماعات كيشار حبائي سنظوري طن العامات طاروزاري وكالدناب براولي 2 John Carried Co

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لعرالت مناكرك يراكي المحاسبة اصفيليته مقدمه رعوى S.A. No. 168/2014 7. باعث تحريريآ نكه مقدمه مندرجه عنوان بالإميں اپن طرف سے واسطے بیروی د جواب دہی وکل کاروا کی متعلقہ آن مقام المعامل زيرى المولان المولان مقرر کرے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کومقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وكيل صاحب كوراضي نامه كرنے وتقرر ثالت ہ فيصله برحلف ديئے جواب دہي اورا قبال دعوي اور بصورت ذاكري كرف اجراءاورصولي چيك وروپيارعرضي دعوى اور درخواست برقتم كي تقيد لق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری میکطرفہ یا بیل کی برامدگی اورمنسوخی نیز دائر کرنے اپیل مگرانی ونظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جز دی کاروائی کے واسطے اور وکیل یا مختار قانونی کوایئے ہمراہ یا اپنے بجائے تقرر کا اختیار موگا۔اورصاحب مقررشدہ کوبھی وہی جملہ ندکورہ بااختیارات حاصل ہوں مے اوراس کاساختہ مرروا ختة منظور تبول موكا _ دوران مقدمه ميس جوخر چدد مرجاندالتوائے مقدمه كےسبب سے وموكا _ کوئی تاریخ بیشی مقام دورہ پر ہو یا حدے باہر ہوتو وکیل صاحب پابند ہول مے۔ کہ بیرونی ندکورکریں۔لہذاوکالت نامہکھدیا کے سندرہے۔ .2014 (3/1) ol Alestal کے لئے منظور ہے۔ Toplet

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Rejoinder						
In Service Tribu	ınal Ap _l	peal N	lo- 168/2014			
· Asghar Ali Shah	1.		· .	•••••••	Petition	er
		Ver	rsus			
The Provincial F			(IGP) Khyber I			
REJOINDER RESPONDENT	Γ'S		PARA-WISE			BY
Respectfully She	eweth:		•			•

PRELIMINARY OBJECTIONS:

The entire preliminary objections raised in the Reply filed by respondents, are misconceived and based on incorrect facts. Through the instant Service Appeal, Appellant has rightly approach to this Hon'ble Tribunal being Civil Servant against final order issued by the appellate authority. Appellant has illegally been compulsorily retired from service, although, the enquiry officer categorically held that charges of corruption and ill-reputation and in-efficiency had not been proved against the appellant.

ON FACTS:

1. Para-1 of the appeal, no reply has been given, hence, needs no rejoinder.

2. Contents incorrect and misleading. Appellant has been charge sheeted and statements of allegation has been served upon him and thereafter inquiry has been conducted. However, in the inquiry report, it has been clearly stated that charges of corruption etc has not been established against appellant and for cheap popularity and poor performance he has been compulsorily retired from service which has not been reflected in the charge sheet. Although appellant earned good PER's for the last three years before taking the impugn action and copy of which will be provided at the time of arguments.

1

- 3. Para-3 of the Para wise reply does not reflect any serious charges despite imposition of minor penalty of "Censure" but the same cannot be made basis for the imposition of major penalty of compulsorily retirement from service. Otherwise, it would amount vexing of appellant twice on the same charges which is clearly prohibited by Article-13 of the Constitution of Islamic Republic of Pakistan, 1973. Beside, on hollow charges, that too not been proved, a major penalty in the form of compulsorily retirement has been imposed at early stage of service which reflects malafide on behalf of respondents.
- 4. Para-4 of the reply is again misconceived and misleading.

 Despite of all illegality and irregularity in the enquiry proceedings, as no statements has been recorded in from of appellant nor any evidence has been brought on record about the charges of inefficiency and so far the charges of cheap popularity it has never been reflected in the charge sheet.
- 5. Para-5 of the reply has been admitted, hence, needs no rejoinder. However, no proper enquiry has been conducted against the appellant and the reply submitted in response of charge sheet has totally been ignored and no opportunity of personal hearing has been provided by the competent authority

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Rejoinder	
In Service Tribunal Appeal No- 16	58/2014
Asghar Ali Shah.	·····Petitioner
Versus	
	P) Khyber Pakhtunkhwa and others Respondents
REJOINDER TO THE PAR RESPONDENT'S	**************************************
AFFI	DAVIT
	yed Sabir Ali Shah, R/O Madina
•	han, do hereby solemnly declare
	ntents of this Rejoinder are true
	knowledge and that nothing has
been concealed from this Honora	
:	Deponent.
Identified By.	Deponent. \@A1167401-9
Farman Ullah Khattak.	ATESTEL Rahmans
Advocate, Peshawar.	A Company of the Comp

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No: 848 /ST

Dated 29 / 05 / 2015

To

The DPO, D.I.Khan.

Subject: -

APPEAL NO. 168/2014 Asghar Ali Shah VS PPO KPK PESHAWAR AND

OTHERS.

I am directed to forward herewith a certified copy of order dated 12.05.2015 passed by this Tribunal on subject appeal for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No. 168/2014

Asghar Ali Shah,
Ex-Sub Inspector, No. 51/D
Presently, Syed Manzil Madina Colony, DIKhan.....(Appellant)

Versus.

- 1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa Peshawar.
- 2. The Regional Police Officer (DIG), Dera Ismail Khan
- The District Police Officer, Dera Ismail Khan(Respondents)

COUNTER AFFIDAVIT ON BEHALF OF RESPONDENTS

We, the respondents do hereby solemnly affirm and declare on oath that the contents, of Comments/Written reply to Appeal are true & correct to the best of our knowledge and nothing has been concealed from this Honourable Tribunal.

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

Regional Police Officer,

Dera Ismail Khān

(Respondent No.2)

District Profes Officer Dera Ismail Chan (Respondent Wo.3).

0 3:01.15

ORDER

This order is aimed to dispose off the department proceeding against SI Asghar Ali shah of this District Police on the charges that he while posted as ASI at PS/Yarik DIKhan, were called upon explanation by DSP/Saddar Circle DIKhan on the allegation that his performance regarding detection of Local and Special Laws, the recovery of illicit arms/ammunition, Narcotics and arrest of Pos as well as preventive action is totally Nil as evident from the weekly working diary from 03.09.2012 to 09.09.2012. The reply furnished by him found not satisfactory. On this he was served with the show cause notice, which was dispersed upon him on 22.01.13, but his reply not received with in stipulated period, therefore Ex-parte action has been taken.

In the light of above, I, SOHAIL KHALID, District Police Officer DIKhan in exercise of powers confirmed upon me under the Police Rules 1975, hereby awarded him minor punishment of "censure" with immediate effect.

ORDER ANNOUNCED

Dated 07.02.2013

OB 240 / DT 18-2-13

District Police Officer Dera Ismail Khan

ORDER

This order is aimed to dispose off the departmental proceeding against SI Asghar Ali Shah No.50/D on the charges that he while posted as SHO PS/Kirri Khaisore DIKhan, on 04.09.2013 Provincial Monitoring Team paid surprise visit to the Police Station and found 02-persons namely Asmat Ullah and Rehmat Ullah sons of Mohammad Sadiq caste Kakar r/o Pashin were detained in the lock-up without any entry about their detention in daily diary nor any criminal case-was registered against them.

The defaulter SI was served with the Charge Sheet and Summary of Allegation and an enquiry was conducted into the matter through Mr. Aman Ullah Khan DSP/Paroa. The Enquiry Officer submit his finding in which he recommended the defaulter SI for Punishment.

In the light of above <u>I Mohammad Nisar Ali (PSP)</u>, District Police Officer DIKhan in exercise of powers conferred upon me under the Police Rules 1975, award him minor punishment of Censure with immediate effect.

District Police Officer,

Dera Ismail Khan

ORDER ANNOUNCED Dated 28.10.2013

0 2 1.15

05-11-1 DI 07-11-1

BEFORE THE CHAIRMAN SERVICES TRIBUNAL, KP, PESHAWAR

C.M.No	/2015
	IN
S.A.No.1	58/2014
Syed Asg	har Ali Shah APPELLAN
	Versus
Provincial	Police Officer and others RESPONDENTS
	APPLICATION FOR ORDERING THE
•	ACCELERATION OF DATE OF HEARING IN
	THE ABOVE APPEAL ALREADY FIXED ON
	02 07 2015

Sheweth as under;

Brief facts leading to the case in hand are as under:-

- That the above appeal is pending in this Hon'ble Tribunal in which today date was fixed for reply and the next date was fixed for rejoinder/ arguments i.e. 02.07.2015, which is too much away almost six/ seven months.
- That similar nature cases pertaining to D.I.Khan Region involving similar question of law has already been decided by this Hon'ble Tribunal on 14.01.2015, titled Abdul Rauf v/s PPO etc.

It is, therefore, humbly prayed that on acceptance of application, for the interest of justice being involved similar question of law, this hon'ble Tribunal may graciously be pleased to accelerate the date of hearing in the above titled appeal from 02.07.2015 to any possible earlier date.

Appellant

Through

Farman Ullah Khattak Advocate Peshawar.

AFFIDAVIT .

I, Syed Asghar Ali Shah (appellant) do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Rejoinder						
In Service Tribun	al 🏻	Appeal N	o- 168/2014			
Asghar Ali Shah.		18(1 - 19) - 190 -	······································		Petition	er' ·
		Ver	sus			
The Provincial Po	lice		(IGP) Khyber I	•		
			· ·			
REJOINDER 7	O	THE	PARA-WISE	REPLY	FILED	BY
RESPONDENT'	\mathbf{S}		•			
作的自由的自由的自由的自由的由来的表示的自	e st staffe	****	សំ កំ ក់ ក់ ក់ ក់ ក់ ក់ ក់ ក់ ក ក ក ក ក ក	*****	មិនិធិនិសិត្តិក្នុង () () () () () () () () () (ឯកសេសក្
	į					

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:

The entire preliminary objections raised in the Reply filed by respondents, are misconceived and based on incorrect facts. Through the instant Service Appeal, Appellant has rightly approach to this Hon'ble Tribunal being Civil Servant against final order issued by the appellate authority. Appellant has illegally been compulsorily retired from service, although, the enquiry officer categorically held that charges of corruption and ill-reputation and in-efficiency had not been proved against the appellant.

ON FACTS:

1. Para-1 of the appeal, no reply has been given, hence, needs no rejoinder.

- 2. Contents incorrect and misleading. Appellant has been charge sheeted and statements of allegation has been served upon him and thereafter inquiry has been conducted. However, in the inquiry report, it has been clearly stated that charges of corruption etc has not been established against appellant and for cheap popularity and poor performance he has been compulsorily retired from service which has not been reflected in the charge sheet. Although appellant earned good PER's for the last three years before taking the impugn action and copy of which will be provided at the time of arguments.
- 3. Para-3 of the Para wise reply does not reflect any serious charges despite imposition of minor penalty of "Censure" but the same cannot be made basis for the imposition of major penalty of compulsorily retirement from service. Otherwise, it would amount vexing of appellant twice on the same charges which is clearly prohibited by Article-13 of the Constitution of Islamic Republic of Pakistan, 1973. Beside, on hollow charges, that too not been proved, a major penalty in the form of compulsorily retirement has been imposed at early stage of service which reflects malafide on behalf of respondents.
- 4. Pára-4 of the reply is again misconceived and misleading. Despite of all illegality and irregularity in the enquiry proceedings, as no statements has been recorded in from of appellant nor any evidence has been brought on record about the charges of inefficiency and so far the charges of cheap popularity it has never been reflected in the charge sheet.
- 5. Para-5 of the reply has been admitted, hence, needs no rejoinder. However, no proper enquiry has been conducted against the appellant and the reply submitted in response of charge sheet has totally been ignored and no opportunity of personal hearing has been provided by the competent authority

and the major benalty has been imposed in slip-shot manner by closing their eyes in order to oblige their bosses.

6. That the appellant being Civil Servant has rightly approach to this Hon'ble Tribunal against the final order within the time and therefore prayed for re-instatement in service with all back benefits because appellant has illegally been compulsorily retired from service despite of the fact that charges of corruption has not been proved.

GROUNDS:

All the grounds were evasively attended, hence needs no rejoinder, however, the imposition of major penalty in the form of compulsorily retirement without establishment of charges leveled against appellant is based on malafide, and to ruin/stigmatized the un-blemished service carrier of the appellant and further to refute the allegations the same will be substantiated at the time of arguments.

It is, therefore, requested that this Honorable Court may kindly be pleased to admit the Appeal with all back benefits and wages as per prayer made in the memo of appeal. Any other relief which was not specially asked for may also be granted in the interest of justice.

Your humble petitioner

Through Counsel

(FARMAN ULLAH KHATTAK)

Advocate, High Court Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Rejoinder	
In Service Tribunal A	ppeal No- 168/2014
- Asghar Ali Shah.	Petitioner
, , , , , , , , , , , , , , , , , , ,	Versus
The Provincial Police	Officer (IGP) Khyber Pakhtunkhwa and others
••••••	Respondents
REJOINDER TO RESPONDENT'S	THE PARA-WISE REPLY FILED BY

Svad Asahor Ali S	AFFIDAVIT
	hah S/O Syed Sabir Ali Shah, R/O Madina trict DI Khan, do hereby solemnly declare
	hat the contents of this Rejoinder are true
	est of my knowledge and that nothing has
been concealed from t	Deportent
Identified By.	CHIC # 12101-3187401-9
Farman Ullah Khattak Advocate, Peshawar.	Colomon and Colomo

جناب عالى!

بحوالہ چارج شیٹ نمبر 74-25073 مورخہ 28.08.2013 مجاریہ جناب DPO صاحب ڈیرہ اساعیل خان S۱ اصغرعلی شاہ پر الزام ہے کہ وہ بدوران سروس کر پشن، ستی شہرت اور کمزور کارکردگی کا شکار رہا۔ان الزمات پر اسکو چارج شیٹ کیا گیا۔

خالات:

حالات، واقعات اوربیانات کی روشی میں پایا گیا کہ اکا اصغطی شاہ محکمہ پولیس میں 1998 کوبطور کسٹبل بحرتی ہوائے۔ اور بیانات کی روشی میں پایا گیا کہ اکا اصغطی شاہ محکمہ پولیس میں 1998 کو بودہ سروس 15 ہوائے۔ ومقان میں ہوئے کے سے بدوران سروس تھانہ جودھوان، بنیالہ، کلا جی اور کڑی خیسو رمیں بطور SHO ڈیوٹی سرانجام دے چکا ہے۔ اس تے بدوران سروس 9 عدد کلاش کوف، 19 عدد پہل ، 14 عددرانقلر ، 6 عدد بندوق بارہ بور، 860 کارتوس، 16 عدد پیٹر ز، 3 عدد کالا کوف، 3550 گرام جرس، 2615 گرام بھنگ برآ مدی جبکہ 6 کسان مجر مان اشتہاری بھی گرفتار کئے ہیں۔

عالے حاء

ا ا ا منزعلی شاہ نے ضلع کے متلف تھا توں میں کل 174 یوم بطور SHO کام کیا ہے۔ ہرتھا نہ سے کمزور کارکردگی کی بناپر اسکا تبادلہ بیان ہوا ہے۔ جوائی کمزور کارکردگی کو ظاہر کرتا ہے۔ البیق ضلع بحرین مشتہری اور محکمہ کے ریکارڈ پر اسکے خلاف کر پیشن ثابت نہ ہوئی۔ چارج شیٹ کے جواب میں اس نے اخباروں کے تراشے اور تصاویر لف کر کے خود ثابت کردیا ہے کہ بیا تفیسر شہرت کا شاکت ہے۔ گی گئی انکوائری ہے پایا گیا کہ ا کا اصغر علی شاہ ستی شہرت کا مالک اور کمزور کارکردگی والا آفیر ہے البیتہ کر پشن اسکے کے خلاف ثابت نہیں ہوگی۔ ا کا اصغر علی شاہ نے چارج شیٹ ہونے پرفوری طور پر عدالت سے رجوع کیا ہے حالا تکہ محکمہ نے اس کوائی صفائی پیش کرنے کا کھلاموقع دیا تھا۔ بیداور بات ہے کہ عدالت نے اسکور یلیف نہیں دیا۔ ا کا اصغر علی شاہ حال ہی تیں جب تھا نہ کڑی خیب ورش تعینات تھے، وہاں سے معطل ہو کر پولیس لائن اسکور یلیف نہیں دیا۔ اکا اصغر علی شاہ حال تا معالی شاہ کو میجر سزاد سے کی سفارش کی جاتی ہے۔ رپورٹ گزارش ہے۔ در کھتے ہوئے چارج شیٹ کیا ہے۔ ا کا اصغر علی شاہ کو میجر سزاد سے کی سفارش کی جاتی ہے۔ رپورٹ گزارش ہے۔ در کھتے ہوئے چارج شیٹ کیا ہے۔ ا کا اصغر علی شاہ کو میجر سزاد سے کی سفارش کی جاتی ہے۔ رپورٹ گزارش ہے۔ در کھتے ہوئے چارج شیٹ کیا ہے۔ ا کا اصغر علی شاہ کو میجر سزاد سے کی سفارش کی جاتی ہے۔ رپورٹ گزارش ہے۔

(امان الله خان)

07-12-2013

D + Khan

White Si

جناب عالى!

بحوالہ چارج شید نمبر 74-35075 مورخہ 28.08 بجاریہ جناب DPO صاحب ڈیرہ اساعیل خانSا اصغرعلی شاہ پر الزام ہے کہ وہ بدوران سروس کریشن، ستی شہرت اور کمزور کارکردگی کا شکار رہا۔ان الزمات پر اسکو چارج شیٹ کیا گیا۔

والايت:

حالات، واقعات اور بیانات کی روشی میں پایا گیا کہ اکا اصغر علی شاہ محکمہ پولیس میں 1998 کوبطور کنسٹبل بھرتی ہوائے جو مقابلے کا امتحال دے کر پلک سروس کمیشن کے تحت 2006 کو PASI سلیک کیا گیا۔ اس کی موجودہ سروس قانہ چودھوان، پنیالہ، کلا چی اور کڑی ضیور میں بطور SHO ڈیوٹی سرانجام دے چکا ہے۔ بدوران سروس تھانہ چودھوان، پنیالہ، کلا چی اور کڑی ضیور میں بطور 860 ڈیوٹی سرانجام دے چکا ہے۔ اس نے بدوران سروس 9 عدد کلاشن کوف، 19 عدد پسٹل ، 14 عدورانفلز ، 6 عدد بندوق بارہ بور، 860 کارتوس، 19 عددر پیٹر ز، 3 عدد کالا کوف، 35 گرام چرس، 2615 گرام بھنگ برآمد کی جبکہ 6 کسان مجر مان اشتہاری بھی گرفتار کئے ہیں۔ کئے۔ حالیہ سنٹرل جیل ڈیرہ سے فرار ہونے والے تین قیدی بھی اس نے گرفتار کئے ہیں۔

عالج حاء

ا ا ا مغرطی شاہ نے ضلع کے شلف تھانوں میں کل 174 یوم بطور SHO کام کیا ہے۔ برتھانہ ہے کمزور کارکردگ کی بنا پر اسکا تبادلہ بیان ہوا ہے۔ جواسکی کمزور کارکردگ کو ظاہر کرتا ہے۔ البتہ ضلع بھر میں مشتہری اور محکمہ کے ریکارڈ پر اسکے خلاف کر بیشن ثابت نہ ہوگی۔ چارج شیٹ کے جواب میں اس نے اخباروں کے تراشے اور تصاویر لف کر کے خود ثابت کھردیا ہے کہ بیا فیسر شہرت کا ماکت ہے۔ گی گئ انکوائری سے پایا گیا کہ ا S اعنوعلی شاہ سسی شہرت کا ماکت اور کمزور کارکردگی والا آفیر ہے البتہ کر پشن اسکے کے خلاف ثابت نہیں ہوسکی۔ ا کا اصغرعلی شاہ نے چارج شیٹ ہونے پر فوری طور پر عدالت ہے کہ مدالت نے دوری کی اسکور یکھنے نہیں کرنے کا کھلاموقع دیا تھا۔ بداور بات ہے کہ مدالت نے اسکور یکھنے نہیں دیا۔ اکا اصغرعلی شاہ حال ہی جن جب تھانہ کڑی خیبور میں تعینات تھے، وہاں ہے معطل ہوکر پولیس لائن اسکور یکھنے نہوائی معاملہ میں چارج شیٹ ہوگر تا حال معطل لائن ہیں۔ افسران بالانے اسکی ان خلاف ورزیوں کوسا ہے در کھتے ہوئے چارج شیٹ کیا ہے۔ ا کا اصغرعلی شاہ کو میجر سر او بینے کی سفارش کی جاتی ہے۔ رپورٹ گزادش ہے۔ رپورٹ گزادش ہے۔

رامس الله خان)

ایس فی پی او سرکل پروا

07-12-2013

Oeputy Superintenders
Police Paroa Circle
D 1 Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No. 168/2014

Asghar Ali Shah,
Ex-Sub Inspector, No. 51/D
Presently, Syed Manzil Madina Colony, DIKhan.....(Appellant)

Versus ?

- 1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa Peshawar.
- 2. The Regional Police Officer (DIG), Dera Ismail Khan
- 3. The District Police Officer, Dera Ismail Khan(Respondents)

WRITTEN REPLY ON BEHALF OF RESPONDENTS.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS.

- 1. That the appellant has got no cause of action & locus standi.
- 2. That the appeal is bad for misjoinder/non-joinder of necessary parties.
- 3. That the appeal is time barred.
- 4. That the appellant has not come with clean hands.
- 5. That the appellant is estopped due to his own conduct.
- 6. That the appellant has concealed the material facts from this Honourable Tribunal.
- 7. That appeal is not maintainable & incompetent

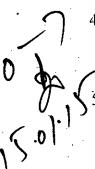
BRIEF FACTS

- Pertains to record.
- 2. Incorrect. Infact the appellant was charge sheeted and statement of allegations was served upon him on the allegations of Ill-reputation, Corruption & Inefficiency. The allegations have been proved against him, a proper departmental enquiry conducted purely on merit and was held guilty.
- 3. Incorrect. The appellant was awarded minor punishment of censure twicely on 07.02,2013 and 28.10.2013 on professional misconduct. Copies of order enclosed as Annex 'A' & 'B'.

- 4. Incorrect. Infact appellant was suspended from the service on chronic and serious allegations of Ill-reputation, Corruption & inefficiency. In this connection, a proper departmental inquiry was initiated and he was found guilty.
- 5. Correct to the extent that appellant moved an appeal against the order of punishment to the appellate authority which was rejected. The remaining portion of the para is incorrect because there was no force in the appeal.
- 6. The appellant has got no cause of action and instant appeal is liable to be dismissed on the following grounds.

GROUNDS

- 1. Incorrect. Infact the order was passed by the departmental authority under the existing law and rules after observing all the legal formalities. No discrimination arbitration, illegality or injustice have been done. Thus, the order are maintainable.
- 2. Incorrect. Infact a proper departmental enquiry was initiated against the appellant on the above mentioned serious allegations under the law and rules, lawful opportunity of defence was given to him and was held guilty.
- 3. Incorrect. The order was passed under the law and rules by the competent authority after proper departmental enquiry.
- 4. Incorrect. The appellant was held guilty in proper departmental enquiry initiated under existing law and rules.
 - Incorrect. A proper departmental inquiry was initiated and appellant was also given lawful opportunity of personal hearing.
- 6. Incorrect. The orders were passed under the law & rules, there was no force in appeal of the appellant.
- 7. Incorrect. A proper departmental enquiry was conducted under the law and all the lawful opportunities of defence including personal hearing was given to him.
- 8. Incorrect. The impound order have been passed in accordance with law and rules and no injustice have been done.



- 9. Incorrect. The orders were passed in accordance with law & rules after due process of departmental enquiry.
- 10. Incorrect. The parawise comments is supported by law, rules and documentary proof.
- 11. May be treated as per law & rules.
- 12. That the respondent may be allowed to raise additional proof/grounds of the time of arguments.

PRAYER

It is, therefore, most humbly prayed that on acceptance of instant parawise comments, the Appeal of the Appellant is devoid of merit may graciously be dismissed.

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

Regional Police Officer, Dera Ismail Khan

(Respondent No.2)

District Police Officer, Dera Ismail Khan (Respondent No.3)

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No. 168/2014

Asghar Ali Shah,
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Presently, Syed Manzil Madina Colony, DIKhan.....(Appellant)

Versus

- 1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa Peshawar.
- 2. The Regional Police Officer (DIG), Dera Ismail Khan
- 3. The District Police Officer, Dera Ismail Khan(Respondents)

AUTHORITY

We, the respondents do hereby authorised DSP/Legal, DIKhan to appear before the Service Tribunal Khyber Pakhtunkhwa, Peshawar, on our behalf, He is also authorised to produce/ withdraw any application or documents in the interest of Respondents and the Police Department.

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

Y DV

Regional Police Officer, Dera Ismail Khan (Respondent No.2)

District Eslice Officer
Dera Ismail Khan
(Respondent No. 3)