

Service Appeal No.7392/2021 titled "Majid Ali-vs-Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others", service appeal No. 7393/2021 titled "Faisal Ali Shah-vs- Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others" and service appeal No. 7394/2021 titled "Shahzad Shah-vs- Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others" decided on 22.09.2022 by Division Bench comprising Kalim Arshad Khan, Chairman, and Fareeha Paul, Member, Executive, Khyber Pakhtunkhwa Service Tribunal, Camp Court Abbottabad.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP COURT ABBOTTABAD.**

BEFORE: **KALIM ARSHAD KHAN ... CHAIRMAN**
FAREEHA PAUL ... MEMBER (Executive)

Service Appeal No.7392/2021

Majid Ali (Ex-Constable No. 351 Police Abbottabad) R/O Sector No.2
Khalabat Township, (KTS) Tehsil & District Haripur.

.....(**Appellant**)

Versus

1. **Provincial Police Officer**, Khyber Pakhtunkhwa, Peshawar.
2. **Regional Police Officer**, Hazara Region, Abbottabad.
3. **District Police Officer**, Abbottabad.

.....(**Respondents**)

Present:

Mr. Muhammad Aslam Tanoli,
Advocate.....For appellant.

Kabirullah Khattak,
Additional Advocate General.....For respondents.

Date of Institution.....10.09.2021
Dates of Hearing.....22.09.2022
Date of Decision.....22.09.2022

Service Appeal No.7393/2021

Faisal Ali Shah, (Ex-Sub, Inspector Police Abbottabad) R/O Village
Changi Bandi, Tehsil & District Haripur.

.....(**Appellant**)

Versus

4. **Provincial Police Officer**, Khyber Pakhtunkhwa, Peshawar.
5. **Regional Police Officer**, Hazara Region, Abbottabad.
6. **District Police Officer**, Abbottabad.

.....(**Respondents**)

Present:

Mr. Muhammad Aslam Tanoli,
Advocate.....For appellant.

Kabirullah Khattak,
Additional Advocate General.....For respondents.

Date of Institution.....10.09.2021
Dates of Hearing.....22.09.2022
Date of Decision.....22.09.2022

.....
Service Appeal No.7394/2021

Shahzad Shah(Ex-IHC No. 756 Police Abbottabad) R/O Mohallah
Loharan Havailian, District Abbottabad.

.....(**Appellant**)

Versus

7. **Provincial Police Officer**, Khyber Pakhtunkhwa, Peshawar.

8. **Regional Police Officer**, Hazara Region, Abbottabad.

9. **District Police Officer**, Abbottabad.

.....(**Respondents**)

Present:

Mr. Muhammad Aslam Tanoli,
Advocate.....For appellant.

Kabirullah Khattak,
Additional Advocate General.....For respondents.

Date of Institution.....10.09.2021
Dates of Hearing.....22.09.2022
Date of Decision.....22.09.2022

.....


APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST ORDER DATED 10.06.2021 OF THE DISTRICT POLICE OFFICER ABBOTTABAD WHEREBY THE APPELLANT HAS BEEN "DISMISSED FROM SERVICE" AND ORDER DATED 12.08.2021 OF THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY APPELLANT'S DEPARTMENTAL APPEAL HAS BEEN FILED.

CONSOLIDATED JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Through this single judgment this appeal and connected Appeal No. 7393/2021 titled "Faisal Ali Shah-vs-Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others" and service appeal No. 7394/2021 titled "Shahzad Shah-vs- Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others" are decided as all the three are against the dismissal of the appellants and the same allegations.

2. According to the facts gathered from the record, disciplinary action was started against all the appellants on the allegations that in a preliminary enquiry, conducted by the Addl: Superintendent of Police Abbottabad, vide his office memo No. 1317/PA dated 01.04.2021, a fake and bogus FIR, No. 139 dated 07.03.2021, under Section 15-AA, was registered at Police Station Nawansher, wherein the time of the occurrence was shown as 1935 hrs while on the same date at 1715/hrs the same accused named Hazrat Gul S/O Bahadar Gul resident of Kotka Sokari, Bannu was charged in a murder case registered vide FIR No. 178 dated 07.03.2021 under Section 302/324/34 PPC Police Station, Bannu Cannt, how was it possible that the accused was charged in 2 FIRs at the same time and date in two very faraway districts.



After conducting the preliminary enquiry, a departmental enquiry was conducted. It was also alleged in the statement of allegations that the appellant reached Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange was out of the jurisdiction of Police Station Nawansher. It was also alleged that preplanning and registering bogus case and obtaining illegal gratification/bribe had been proved against the appellant which shows there malafide intention, severe violation, a serious professional dishonesty and gross misconduct in terms of police E&D Rules 1975. The appellants submitted their reply to the charge sheet whereafter final show cause notice was issued to them, which were also responded. The District Police Officer, Abbottabad relied on the departmental inquiry and after hearing the appellants, awarded them major punishment of dismissal from service on 10.06.2021. The appellants filed departmental appeals which were regretted/filed by the Regional Police Officer, Hazara Region, Abbottabad vide order dated 12.08.2021 and the appellants then filed these appeals.

3. On receipt of the appeals and admission to full hearing, the respondents were summoned, who, on putting appearance, contested the appeals by filing written reply raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellants.

4. We have heard learned counsel for the appellants and learned Additional Advocate General for the respondents.



5. The learned counsel for the appellants reiterated the facts and grounds detailed in the memo and grounds of the appeals while the learned Additional Advocate General controverted the same by supporting the impugned order.

6. The entire episode of these appeals can be summarized in the manner and that the appellants managed registration of a fake case vide FIR No. 139 dated 07.03.2021 under Section-15-AA of Police Station Nawansher, Abbottabad in order to show presence of the accused Hazrat Gul son of Bahadur Gul resident of Kotkah Sokari, Bannu, at Abbottabad who was charged in a murder case registered, on the same day, at Police Station Cantonment Bannu under Sections 302/324/34 PPC just two hours and few minutes prior to the time of occurrence shown in FIR No. 139 registered at Police Station Nawansher, Abbottabad. A preliminary inquiry was conducted by the Additional Superintendent of Police, Abbottabad and then departmental inquiry was conducted by the SP investigation Abbottabad. According to the observations in the inquiry everything was allegedly inquired and tried to be thrashed out except to ascertain the fact whether the accused Hazrat Gul son of Bahadur Gul, involved in the two FIRs, registered on the same date, at two different districts, falling far-away from each other, was actually the same person and present and arrested by the appellants in FIR No. 139 or he was not actually the same person and was present at Bannu. The observation No. 3 of the inquiry report, referred to a CDR of all relevant persons, collected in the previous preliminary inquiry, which revealed that the appellants reached Khokhar Maira interchange clearly indicates that they received the accused (Hazrat Gul) in protocol under the direction of the SHO at Khokhar Maira

interchange. The enquiry report said that this prima facie shows that the accused Hazrat Gul was actually in Abbottabad but prima facie observation would not be sufficient to hold that he was actually Hazrat Gul and not a fake person planted to benefit Hazrat Gul in a murder case registered at district Bannu. The preliminary as well as the departmental inquiry both are silent to show and prove the fact whether Hazrat Gul was actually in Abbottabad at the relevant point of time, when FIR was registered at Abbottabad or a fake person was arranged and shown as Hazrat Gul. In case it is established that the accused Hazrat Gul was a fake person, arranged by the appellants at Abbottabad, to establish his alibi, in order to exonerate him from the murder charge at Bannu, then of course the act of the appellants would be a gross misconduct and in case, which, of course, could be easily verified from the finger prints of the person arrested in FIR No. 139 at Abbottabad and his finger prints from the jail record and compared with the record of the NADRA, it is established that accused Hazrat Gul was actually at Abbottabad and was arrested by the appellants in case FIR No. 139 dated 07.03.2021, then the situation could be quite different as such a situation would not prove at least, the allegation that the case was registered by the appellants to extend benefit to the accused Hazrat Gul to establish his alibi so that he could be exonerated from the murder charge at Bannu. During the course of arguments, the learned counsel for the appellant produced certified copy of order dated 24.02.2022 passed by learned Judicial Magistrate-I Abbottabad whereby the FIR registered at Abbottabad was cancelled. The learned Magistrate held in the order that the officials of the concerned Police Station, in their statements

before inquiry officer admitted that the FIR was registered at about 04:30 AM or 05:00 AM in the morning time on 08.03.2021 and in this respect one day prior i.e. on 07.03.2021, the SHO called the muharrir to keep pending the Roznamcha of 07.03.2021 as he had to register an FIR and on the order of SHO the Muharrir kept the Roznamcha of 07.03.2021 pending till 08.03.2021 (morning) while in the FIR the time of lodging the FIR was mentioned as 2040 hours (08:40 PM). Meaning thereby the FIR was registered in back date. Similarly, one constable Sheraz No. 1132 also admitted before the inquiry that his name was included in the Fard as witness, but neither he was present on the spot nor he has signed on the Fard. Since, in the departmental inquiry it is proved that the FIR was fake, bogus and preplanned, therefore, the cancellation report was filed. The inquiry officer has, though, brought this fact in his observations that the FIR was registered on 08.03.2021 around 4/5 AM but there is no clarification whether only the FIR was registered late or Marasala for lodging the FIR was also drafted late i.e. on 08.03.2021 at 4/5 AM and not on the date and time mentioned in the FIR itself, the copy of which is found placed on file and the same negates the above fact. We find copies of the daily diary No. 33, 38, 39 & 47. According to daily diary No. 33 dated 07.03.2021 the appellants had left the Police Station at 1855 hrs for gasht. Daily diary No. 38 shows that the marasala was drafted by the SHO Faisal Ali Shah and sent through Majid Ali No. 351 (both are the appellants before us) for registration of FIR No. 139 under Section 15AA. Similarly daily diary No. 39 shows that the ASI concerned had completed the FIR around 2050 hrs. These daily diaries also negate the fact stated in the inquiry

report. Therefore, we find that the above points have not been either enquired, clarified, answered or established during the inquiry. In the absence of inquiry with respect to the above detailed points/facts the punishment awarded to the appellants would not be appropriate.

7. Therefore on allowing these appeals, we set aside the impugned orders of dismissal of all the three appellants from service as well as the appellate order filing their departmental representations and direct that a detailed de-novo inquiry be conducted, covering the above facts/observations/points made by us and then proceed in accordance with the result/outcome. The appellants are reinstated for the purpose of the above enquiry. The back benefits shall be subject to the outcome of the de-novo enquiry. The enquiry shall be completed within a period of sixty days from the date of receipt of this judgment and the compliance report be submitted to the Registrar of this Tribunal. Date of receipt of this judgment be also acknowledged to the Registrar of this Tribunal. Costs shall follow the event. Consign.

8. *Pronounced in open Court at Abbottabad and given under our hands and the seal of the Tribunal on this 22nd day of September, 2022.*



Kalim Arshad Khan
22/09/22
KALIM ARSHAD KHAN
Chairman
Camp court Abbottabad

Fareeha Paul
FAREEHA PAUL
Member (Executive)
Camp court Abbottabad

ORDER

22 Sept, 2022

1. Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

2. Vide our detailed judgement of today placed on file (containing 08 pages), therefore on allowing these appeals, we set aside the impugned orders of dismissal of all the three appellants from service as well as the appellate order filing their departmental representations and direct that a detailed de-novo inquiry be conducted, covering the above facts/observations/points made by us and then proceed in accordance with the result/outcome. The appellants are reinstated for the purpose of the above enquiry. The back benefits shall be subject to the outcome of the de-novo enquiry. The enquiry shall be completed within a period of sixty days from the date of receipt of this judgment and the compliance report be submitted to the Registrar of this Tribunal. Date of receipt of this judgment be also acknowledged to the Registrar of this Tribunal. Costs shall follow the event. Consign.

3. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 22nd day of Sept, 2022.*



**(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad**



**(Fareeha Paul)
Member(Executive)
Camp Court Abbottabad**

21th July 2022

Learned counsel for the appellant present.
Kabiruallah Khattak, Addl: AG and Mr. Noor Zaman
Khattak, District Attorney for respondents present.

Learned counsel for the appellant seeks
adjournment on the ground that he has not prepared the
case. Adjourned. To come up for arguments on
22.09.2022 before D.B at camp court Abbottabad.



(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

19.01.2022

Learned counsel for the appellant present. Mr. Shamraiz Khan, ASI alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and sought time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 14.02.2022 before the S.B at Camp Court Abbottabad.



(Salah-ud-Din)
Member (J)
Camp Court A/Abad

17.05 2022

Counsel for the appellant present. Mr. Muhamad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Shamraiz, SI for the respondents present.

Written reply/comments on behalf of respondents submitted which is placed on filed. A copy of the same is handed over to the learned counsel for the appellant. To come up for rejoinder as well as arguments before D.B on 15.06.2022 at camp court Abbottabad.



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

15.06.2022

Appellant present through counsel.

Noor Zaman Khan Khattak, learned District Attorney alongwith Shamrazi ASI (Legal) for respondents present.

A request was made for adjournment on behalf of learned counsel for the appellant in order to produce relevant documents; granted. Learned DDA also requested for placing on file relevant record in respect of inquiry which is allowed and the entire record is placed on file. To come up for arguments on 21.07.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

01.11.2021

Appellant in person present. Preliminary arguments heard and case file perused.

Learned counsel for the appellant argued that the appellant is aggrieved of original impugned order dated 10.06.2021 whereby he was dismissed from service. The appellant preferred departmental appeal on 21.06.2021 which was filed vide appellate order dated 12.08.2021, hence, the instant service appeal instituted in Service Tribunal on 10.09.2021. Moreover, the ends of justice have not been met. Neither opportunity of personal hearing granted nor examination of any witnesses done. No proper procedure has been followed and no findings of any enquiry provided to the appellant and as such the appellant has been condemned unheard. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 10.01.2022 before the D.B at camp court Abbottabad.


(Mian Muhammad)
Member(E)

10/01/2022.

Due to cancellation of tour, the case is adjourned to 19/01/2022.


Reader.



Appellant Deposited
Security & Process Fee

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7392 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/09/2021	<p>The appeal of Mr. Majid Ali presented today by Mr. Muhammad Aslam Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p> <p>This case is entrusted to S. Bench for at Peshawar. Notice be issued to appellant/counsel for preliminary hearing to be put up there on- <u>01/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Majid Ali vs KPK PPO/19P & Others

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Muhammad Aslam Tarihi Advocate</u>		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?		
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?		✓
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Muhammad Aslam Tarihi
Advocate

Signature: M. Aslam

Dated: 09-09-2021

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No.....7392/21

Majid Ali (Ex-Constable No.351 Police Abbottabad) R/O Sector
No. 2. Khalabat Township, (KTS) Tehsil & District Haripur.
(Appellant).

VERSUS

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Abbottabad **(Respondents)**

SERVICE APPEAL

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4.	Impugned Order dated 10-06-2021 of DPO	"E"	13
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6.	Departmental Appeal dated 21-06-2021	"I"	17-21
7.	Appeal Rejection Order dated 12-08-2021.	"J"	22
9.	Wakalatnama		

Through

Appellant

M. Aslam

(Mohammad Aslam Tanoli)
Advocate High Court
at Haripur

Dated: 10-08-2021

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No...7392.../21

Khyber Pakhtunkhwa
Service Tribunal

Entry No. 7540

Dated 10/9/2021

Majid Ali (Ex-Constable No.351 Police Abbottabad) R/O Sector
No. 2. Khalabat Township, (KTS) Tehsil & District Haripur.

(Appellant)

VERSUS

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Abbottabad **(Respondents)**

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL
ACT 1974 AGAINST ORDER DATED 10-062021 OF THE DISTRICT
POLICE OFFICER ABBOTTABAD WHEREBY THE APPELLANT HAS
BEEN "DISMISSED FROM SERVICE" AND ORDER DATED 12-08-
2021 OF THE REGIONAL POLICE OFFICER HAZARA REGION
ABBOTTABAD WHEREBY APPELLANT'S DEPARTMENTAL APPEAL
HAS BEEN FILED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH
THE IMPUGNED ORDERS DATED 10-06-2021 AND 12-08-2021 OF
THE RESPONDENTS MAY GRACIOUSLY BE SET ASIDE AND
APPELLANT BE RE-INSTATED IN SERVICE FROM THE DATE OF
DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.**

I

Respectfully Sheweth:

1. That appellant while posted as Constable Police Station Nawansher (Abbottabad) was served upon with a charge sheet dated 02-04-2021 by the District Police Officer Abbottabad which was replied on 12-04-2021 explaining all facts and circumstances of the matter and the allegations were denied. **(Copies charge sheet and its reply are attached as Annex-"A & B")**.

Filed to-day
Registrar
10/9/2021

②

2. That similarly thereafter the District Police Officer Abbottabad issued a final show cause notice dated 04-06-2021 with the same allegations which was also replied on 08-06-2021. The allegations were vehemently denied. **(Copies of final show cause notice and its reply are attached as Annex-"C & D")**.
3. That proper departmental enquiry was not conducted. No witness was called by the so-called inquiry officer in the presence of appellant nor was he afforded to cross examine such a witness if any. Neither documentary evidence was produced against the appellant before the enquiry officer nor was he confronted with such documentary evidence. Copy of enquiry findings, if any, was also not issued to the appellant before serving final show cause notice. Even opportunity of personal hearing was not provided to appellant and he was condemned unheard thus principle of natural justice was seriously violated in his case.
4. That the District Police Officer Abbottabad without giving any consideration to the stance taken by appellant in his reply dismissed him from service vide order dated 10-06-2021 in a whimsical and cursory manner and that too without any reason, justification and proof. **(Copy of dismissal order dated 10-06-2021 is as Annex-"E")**.
5. That in fact on 07-03-2021 at 18:55 hours, the appellant alongwith SHO & police party set out from Police Station Nawansher on his routine patrolling duty. When appellant alongwith police party present at Kund-Barrier- Road they

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noticed a person trying slipping away on seeing the police. The person being suspected one was arrested and his body search was made. During search a 30 bore pistol alongwith 10 live cortèges were recovered for which accused could not produced any license etc. He disclosed his name as Hazrat Gul S/O Bahadar Gul R/O Kotkay Sokari Bannu. Murasila etc were prepared by SHO on the spot and sent to Police Station for registration of FIR through appellant. FIR No.139 dated 07-03-2021 U/S-15AA was registered against the accused. Accused was brought to the Police Station and confined in Lock-up. After Completing necessary proceedings the next day accused was produced before the Judicial Magistrate from where he was sent to jail on judicial remand. **(Copies of Departure, Arrival reports and FIR are attached as Annex "F, G & H").**

6. That it was not in the knowledge of police party that accused was also charged in a case u/s-302/34 dated 07-03-2021 at Bannu district. It is totally incorrect, false and fabricated that appellant alongwith IHC Shahzad Shah reached Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO. Accused was arrested from Kund-Barrier Road. It is totally incorrect that during preliminary inquiry planning of registration of bogus case or obtaining any illegal gratification/bribe was ever proved. Nothing wrong has been proved against him. Appellant did all that was actually happened. Appellant did not know the accused, and had no previous relation or enmity etc with accused. Allegations

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are baseless, false, fabricated and based on malafide having no nexus with truth.

7. That appellant has discharged his assigned duties with honesty. There is nothing wrong on his part. The extreme major punishment of dismissal from service awarded to the appellant is against the facts in whimsical and cursory manner, illegally and without lawful authority.
8. That afore mentioned order of the DPO Abbottabad was appealed against on 21-06-2021 before the Regional Police Officer, Hazara Region, Abbottabad which was **filed** vide order dated 12-08-2021 and that too without giving any heed to the grounds taken by appellant in the memo of appeal. **(Copies of departmental Appeal dated 21-06-2021 and order 12-08-2021 are attached as Annex- "I & J")**, hence instant service appeal, inter alia, on the following amongst other:-

GROUND:

- A) That orders dated 10-06-2021 and 12-08-2021 of respondents are illegal, unlawful, against the facts, departmental rules & regulation, passed in a cursory, whimsical and arbitrary manner; hence are liable to be set aside.
- B) That proper departmental enquiry was not conducted. No witness was called by the so-called inquiry officer in presence of appellant nor was he afforded to cross examine such a witness. Neither documentary evidence

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was produced against the appellant nor was he confronted with such documentary evidence if any. Copy of enquiry findings, if any, was also not issued to the appellant before serving final show cause notice. Even opportunity of personal hearing was not provided to appellant and he was condemned unheard thus principle of natural justice was seriously violated in his case.

- C) That appellant had no knowledge that accused was also charged in a case u/s-302/34 dated 07-03-2021 at Bunu District. Appellant did only that which had actually happened and discharged his duty honestly. Appellant did not know the accused, and had no previous relation or enmity etc with accused. It is totally incorrect that during preliminary inquiry planning of registration of bogus case or obtaining any illegal gratification/bribe was ever proved against appellant. Nothing wrong on the part of appellant was proved. Allegations are quite baseless, false and based on malafide having no nexus with truth.
- D) That appellant had no knowledge that accused was also charged in a case u/s-302/34 dated 07-03-2021 at Bunu District. Appellant did only that which actually happened. Appellant did not know the accused, and had no previous relation or enmity etc with accused. It is totally incorrect that during preliminary inquiry planning of registration of bogus case or obtaining any illegal gratification/bribe was ever proved against appellant. Nothing wrong on the part of appellant was proved. Allegations are quite baseless, false, fabricated and based on malafide having no nexus with truth.

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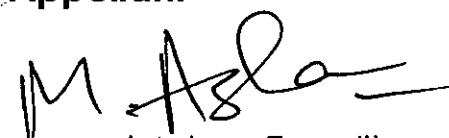
- E) That the appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken in the memo of appeal. Thus the impugned order of appellate authority is contrary to the law as laid down in Police Rules read with section 24-A of General Clause Act 1897 and Article 10A of the Constitution of Islamic Republic of Pakistan 1973.
- F) That instant service appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain & adjudicate upon the lis.

PRAYER:

It is, therefore, humbly prayed that on acceptance of instant Service appeal order dated 10-06-2021 and 12-08-2021 of respondents may graciously be set aside and the appellant be reinstated in his service from the date of dismissal with all consequential service back benefits. Any other relief which this Honorable Tribunal deems fit and proper in circumstances of the case may also be granted.


Appellant

Through:

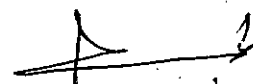

(Mohammad Aslam Tanoli)
Advocate High Court
At Haripur

Dated 10-08-2021

VERIFICATION

It is verified that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.

Dated 10-08-2021


Appellant

(7)

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Majid Ali (Ex-Constable No.351 Police Abbottabad) R/O Sector
No. 2. Khalabat Township, (KTS) Tehsil & District Haripur.

(Appellant)

VERSUS

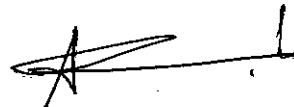
1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Abbottabad

(Respondents)

SERVICE APPEAL

AFFIDAVIT:

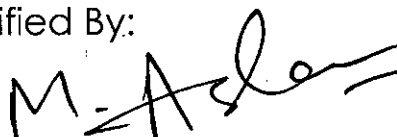
I, Majid Ali, appellant do hereby solemnly declare and affirm on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Service Tribunal.



Deponent/Appellant

Dated: 10-08-2021

Identified By:



Mohammad Aslam Tanoli
Advocate High Court
At Haripur





Appellant

8

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Majid Ali (Ex-Constable No.351 Police Abbottabad) R/O Sector
No. 2. Khalabat Township, (KTS) Tehsil & District Haripur.

(Appellant)

VERSUS

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

(Respondents)

SERVICE APPEAL

CERTIFICATE

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



APPELLANT

Dated: 09-08-2021

(9)

Annex - A

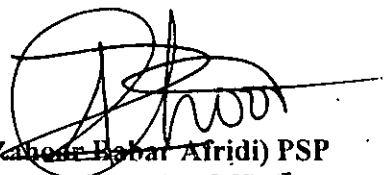
DISCIPLINARY ACTION

I, Zahoor Babar Afridi (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you FC Majid No. 351 PS Nawansher rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975 (amended 2014):

STATEMENT OF THE ALLEGATIONS

I. As per preliminary enquiry conducted by Addl: SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, you FC Majid No. 351 while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 138 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that you alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against you. All this shows your malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975, hence charge sheeted.

- 2). For the purpose of scrutinizing your conduct with reference to the above allegations, SP, Inv. A-7 is hereby appointed as Enquiry officer.
- 3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to you, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action against you.
- 4). You are hereby directed to attend the proceedings on the due date, time and place fixed by the Enquiry Officer.


(Zahoor Babar Afridi) PSP
District Police Officer
Abbottabad

No: 129 /PA, Dated Abbottabad the 02/04/2021.

Copy to:

1. Enquiry Officer for initiating proceedings against the defaulter officer under provisions of the Police Disciplinary Rules 1975 (amended 2014) and submit findings within stipulated period.
2. FC Majid No. 351 PS Nawansher (delinquent officer/ official).

Attested
Addl. Superintendent of Police Abbottabad

(10)

گورنمنٹ ہسپتال ایف بی سی۔ انٹرنیشنل ہسپتال آباد (انٹرنیشنل)

لوڈنگ سٹیشن چارج شیڈول 129/14 فورس 54 2021

ضلعی۔ گذرگاہ۔ گورنمنٹ ہسپتال ایف بی سی۔
پولیس سٹیشن۔ ایف بی سی۔ گورنمنٹ ہسپتال ایف بی سی۔

1- 22 فورس 3 07 بجت قریباً 19:35 بجے ڈیڑھ گھنٹے تک

ڈیڑھ گھنٹے تک قریباً 19:35 بجے ڈیڑھ گھنٹے تک
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Attested
Addl: Superintendent of Police Abbottabad

گورنمنٹ ہسپتال ایف بی سی۔ گورنمنٹ ہسپتال ایف بی سی۔
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ATTESTED
Superintendent of Police Investigation, Abbottabad

Handwritten signature

(11)

Annex - e

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

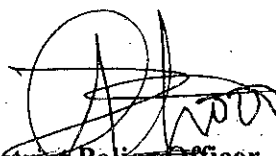
No: 212/PA, Dated Abbottabad, the 04/06/2021.

FINAL SHOW CAUSE NOTICE
(Unit Rule (3) KPK Police Rules, 1975 amended 2014)

1. That you **FC Majid No. 351** rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) for following misconduct;
 1. As per preliminary enquiry conducted by Addl: SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, you FC Majid No. 351 while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 178 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that you alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against you. All this shows your malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975:-

II. During proper departmental enquiry the allegations have been proved against you.

2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of enquiry officer;
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the police force will amount to encouragement of inefficient Police officers;
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
6. You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975(amended 2014) for the misconduct referred to above.
7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.
9. Grounds of action are also enclosed with this notice.


District Police Officer
Abbottabad

Received by _____

Dated ___/___/2021

**Addl.
Superintendent of
Police Abbottabad**

Alleged

(12)

Annex-1

خدمت جناب DPO صاحب ایسٹ آفیس آباد

عنوان: جواب فائل شوکار لوٹس بندری 212/PA

4.6.21

جناب عالی

زادشاد علیہ فائل شوکار لوٹس بندری عنوان موصول شدہ ہے

جس کے جواب میں ذیل موضوع خدمت میں ہوں

① یہ عہدہ مورخہ 7/3/21 بوقت تقریباً 19:35 بجے میرا دیپٹی پولیس ملازمین زید نوری صاحب سے منسلک تھا۔ SHO خانہ لوٹاں سے علاقہ میں روٹین گشت پر موجود تھا کہ گند سپر سٹرور ایک شخص کی حالت میں ملائی جوا جسے زید نوری صاحب نے SHO صاحب کے ساتھ لے کر لائی اور اس عرصہ میں تلاشی مذکورہ شخص سے ایک عدد ریسل 30 پوز 10 عدد کارٹریجز پر آماریف شخص مذکورہ ایسا نام حضرت گل ولد نیار گل سائنہ کو ٹکے سواروں بنوں بلال را جو SHO صاحب کے زیر اسد رستہ کے بڑے درخت FIR کرنے میں حوالہ کیا جو میں نے خانہ بنیایا۔

② یہ کہ میں ملازم نہ تو کوئی اور میں اللہ رحیم صاحبہ میرا SHO سید اوسلہ لیا اور نہ میں ملازم مذکورہ کو جان سے رسوا کیا اور نہ ہی کوئی دیپٹی کو لے دیا اور نہ ہی پولیس SHO صاحب نے ایسی کوئی دہراستہ دی نہ ہی میں ملازم کو کسی وصولی رسوائی کے بارے میں کوئی علم ہے۔ مجملہ الزامات غلطے بنیاد اور میں گورنمنٹ میں جس میں کوئی صداقت نہ ہے۔ میں ملازم نے جو گواہ کیا۔ دیکھا۔ نظر بند میں زید نوری صاحب۔

لہذا الزام کی پوزیشن کرنا ہوں

③ یہ کہ اگر میں ملازم کو سنبھلنے کے کامو قہم دیا۔ تو مجملہ الزامات کو صحیح طور پر کر کے غلط ثابت کر دوں گا

اسد علیہ فائل شوکار لوٹس کو زید نوری صاحب داخل دفتر کیے جانے کی سفارش فرمائی جاتے۔

کشیل صاحب صاحب 35 ڈسٹرکٹ پولیس ایسٹ آفیس آباد وصال پولیس لائن ایسٹ آفیس آباد

08/06/21

[Handwritten signature]

Added
Add: Superintendent of Police Abbottabad

E

113

Annex-E

ORDER


This office order will dispose off the departmental enquiry against **FC Majid No. 351**. As per preliminary enquiry conducted by Addl: SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, he while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 178 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that he alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against him. All this shows his malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975.

He was issued with Charge Sheet along with statement of allegations. **SP Investigation Abbottabad** was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings wherein he reported that the allegations level against delinquent official are proved correct. He was issued with Final Show Notice. He was summoned to appear in Orderly Room on 09-06-2021. He was given a patient hearing but he had nothing plausible to state in his defence.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, Zahoor Babar Afridi, PSP, District Police Officer, Abbottabad as a competent authority, am constrained to award him the punishment of **Dismissal form Service** with immediate effect.


Order announced.

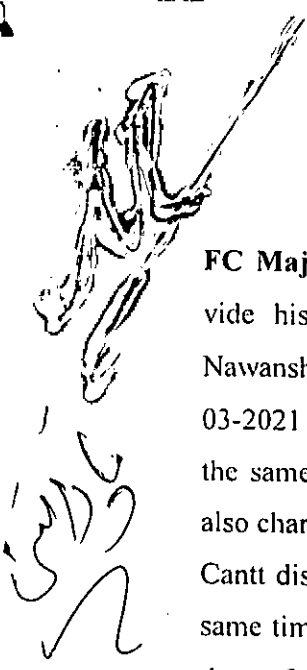
OB No. 184
 Dated 10-6-21


 District Police Officer
 Abbottabad

CC.

1. Pay Officer DPO Office.
2. SRC DPO Office.
3. OHC DPO Office alongwith Enquiry containing (41) pages for completion of record.

Attested

 Addl. Superintendent
 Police Abbottabad



صفحہ ایسٹ آباد

(14)

مخارجہ لٹوال سپر

نقل ریل گاڑی 33 روزانہ 07/03/21

Annex-F

33
روانگی فصل شاہ 540 07/03/21 وقت 18:55 بجے اس وقت میں ہے
شہزاد شاہ IHC کیلے 740- شہزاد 1132- حاجہ 351 کے
درست باوردی باغیچے بعض کھجور گھٹ دیکر کارسنگار روانہ ہو رہے
تھکانے کا یہ ہوتا ہے۔

اجناس عالیا
نقل بطائی (30) کی
MMA-PS-NSR
07-03-21

38
آسٹریٹیب پریج سنیف الرجسٹری ASI 07/03/21 وقت 20:40 بجے اس وقت
تھری پریج سنیف سنیف فصل شاہ 540 کی سنیف حاجہ 351 و سنیف پریج
مصرف ملے 139 جیم 1588/100 کی چاکینی سنیف سنیف عالی ہے۔

اجناس عالیا
نقل بطائی (30) کی
MMA-PS-NSR
07-03-21

39
چائے تریٹیب پریج ASI 07/03/21 وقت 20:50 بجے اس وقت سنیف سنیف
تریٹیب پریج سنیف سنیف سنیف بالائی چاکینی سنیف سنیف سنیف سنیف
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اجناس عالیا
نقل بطائی (30) کی
MMA-PS-NSR
07-03-21

Attest

A

ضلع اسیٹ آباد

15

نقل ریشہ 47 راولپنڈی 08/03/021

عائزہ نواز سید
Amner G

47
والی کا نقل شاہ SHO 08/03 وقت 00:10 بجے اس وقت میں سے بعد اسیٹ آباد
کے رہنے والے اور 33 بلا لیمے از فہرست گشت دیگر کارس کارس اور
گھانٹے سے اس آگے ہوں۔ گھانٹے سے روانہ ہو کر سری روڈ۔ جہاں کالونیوں
15AA وغیرہ PMA روڈ ٹھہرنے والی روڈ وغیرہ میں گشت کی گئی۔ دوران گشت
کے میں پتھر روڈ پر موجود گھانٹے کے پاس عینہ صلیب میں علاقے
ہوئے جس کو گاڑی میں گرنے کی شک کی بنا پر جائے تلاشی حسب ضابطہ عمل
میں لائی۔ دوران تلاشی مذکورہ کے بلحاظ سوار سے ایک ضربیہ نقل
30 لیور گیری - 276 2906 سے 10 ضربیہ کارٹوس میں سے پتھر
ہوا۔ دریافت ہر مذکورہ سے ایسا نام حضرت گل ولد۔ بناو گل قوم
پستون سیکہ کو گلہ سوری بیٹوں بنلایا۔ ایچ ایچ سٹیشن پر سے فریڈ
فیلڈ پولیس اسٹیشن کو ذرا کو سرنگب جبرم والا ٹاپا کر حسب ضابطہ اسٹینڈ
کر کے سر اسٹیشن اندر سے صرف ارسال گھانٹے سے لے کر بعد بلڈنگ
یا ڈار چو کیداران کو چیک کیا تاکہ یہ ایٹان ضابطہ ہوگی ہیں۔ دیگر ضابطہ
گیزی۔ بعد اسیٹ آباد سے ایچ ایچ سٹیشن دست طور پر اخراج کرتے ہوئے آیا گیا۔

15AA
01
نقل
01
کارٹوس
10

جناب عالی!

نقل مطابق اصل
08-03-021
MM-PS-1188

Attested

Handwritten signature

CPD Form-133/26-2002 Form Size: 24x36cm Form No. 5.27

تاریخ نمبر 15-12-2021

پولیس نمبر 139

ابتدائی اطلاع رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ نو جداری

اسٹیشن نام

داتا سٹیٹ

تاریخ وقت وقوع 21/12/2021 03:40 بجے 219135

علاقہ 139

تاریخ وقت رپورٹ 21/12/2021 07:30 بجے 219135

جاہد علی پٹیل

نام و کنیت اطلاع دہندہ ستیث دھیل کشاہ 9115

پتہ 10/10/2021

تفصیلات جرم (مصدقہ) حال اگر کچھ ایسا ہو تو درج کروائیں

0300663330

ماتہ ذوقہ طاہرہ صاحبہ اور صاحبہ طاہرہ طاہرہ صاحبہ

111815

نام و کنیت لقمہ قتل و گولہ باریک من قتل

کارروائی پر تفتیش کے متعلق کسی بھی اطلاع درج کرنے میں توقف ہوا تو وجہ بیان کرو

جسٹس جہاد محمد صاحب

تاریخ و وقت

ابتدائی اطلاع کے درج کردہ نام و پتہ ذیل ہے اور دست آویز
 11/32/2021 03:40 بجے 219135
 جاہد علی پٹیل
 10/10/2021
 نام و کنیت اطلاع دہندہ ستیث دھیل کشاہ 9115
 ماتہ ذوقہ طاہرہ صاحبہ اور صاحبہ طاہرہ طاہرہ صاحبہ
 نام و کنیت لقمہ قتل و گولہ باریک من قتل
 کارروائی پر تفتیش کے متعلق کسی بھی اطلاع درج کرنے میں توقف ہوا تو وجہ بیان کرو

PS:NR
7-3-2021

Attested

(Signature)

9

(17)

Armb - 9

BEFORE HONOURABLE REGIONAL POLICE OFFICER
HAZARA REGION ABBOTTABAD.

DEPARTMENTAL APPEAL AGAINST ORDER OB NO. 184 DATED 10-06-2021 OF THE DISTRICT POLICE OFFICER ABBOTTABAD WHEREBY APPELLANT HAS BEEN DISMISSED FROM SERVICE"

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL ORDER DATED 10-06-2021 OF THE DPO ABBOTTABAD MAY KINDLY BE SET ASIDE AND APPELLANT BE RE-INSTATED IN SERVICE FROM THE DATE OF DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

The following few lines are submitted for your kind consideration and favorable order please:-

1. That appellant while posted as Constable at Police Station Nawansher (Abbottabad) was issued with a charge sheet by the District Police Officer Abbott bad vide No. 129/PA dated 02-04-2021. **(Copy of charge sheet dated 02-04-2021 is attached as "A")**.
2. That the above mentioned charge sheet was duly replied on -04-2021 stating all facts and circumstances of the matter straightaway denying the allegations included therein. **(Copy of reply dated -04-2021 is attached as "B")**.
3. That thereafter appellant was issued with a final show cause notice dated 04-06-2021 by the District Police Officer Abbottabad with the same allegations as

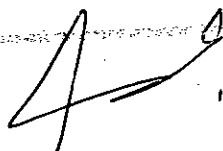
Attested
As

18

previously. **(Copy of final show cause notice dated 04-06-2021 is attached as "C").**

4. That the said final show cause notice was replied on 08-06-2021 explaining all facts and circumstances and denying the allegations mentioned therein. **(Copy of reply dated 08-06-2021 is attached as "D").**
5. That no proper departmental enquiry was conducted. Neither any witness was called by the so-called inquiry officer in the presence of appellant nor was he afforded with opportunity to cross examine such a witness if any. Neither any documentary evidence was produced before enquiry officer nor was appellant confronted with such a documentary evidence, if any. Copy of enquiry findings, if any, was not issued to the appellant before serving final show cause notice. Even opportunity of personal hearing was not provided to the appellant and condemned unheard thus principle of natural justice was seriously violated in the case of appellant.
6. That thereafter the District Police Officer Abbottabad without giving any consideration to the stance taken in reply as referred above and without any reason, justification and proof, in a whimsical and cursory manner awarded the appellant with major penalty of dismissal from service vide order dated 10-06-2021. **(Copy of dismissal order dated 10-06-2021 is as "E").**

Attested

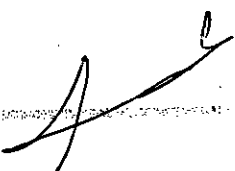


19

7. That in fact on 07-03-2021 at 18:55 hours, the appellant alongwith SHO & police party set out from Police Station Nawansher on his routine patrolling duty. When appellant alongwith police party present at Kund-Barrier- Road they noticed a person trying slipping away on seeing the police. The person being suspected one was arrested and his body search was made. During search a 30 bore pistol alongwith 10 live cortèges were recovered for which accused could not produced any license etc. He disclosed his name as Hazrat Gul S/O Bahadar Gul R/O Kotkay Sokari Bannu. Murasila etc were prepared by SHO on the spot and sent to Police Station for registration of FIR through appellant. FIR No.139 dated 07-03-2021 U/S-15AA was registered against the accused. Accused was brought to the Police Station and confined in Lock-up. After Completing necessary proceedings the next day accused was produced before the Judicial Magistrate from where he was sent to jail on judicial remand. **(Copies of Departure, Arrival reports and FIR are attached as "F. G & H").**

8. That it was not in the knowledge of appellant that accused was also charged in a case u/s-392/34 dated 07-03-2021 at Bunnu district. It is totally incorrect, false and fabricated that appellant alongwith IHC Shahzad Shah reached Khokhar Maira interchange to receive the accused in protocol under the direction of SHO

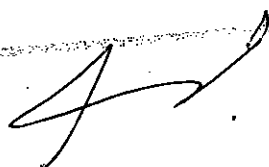
Attested



Accused was arrested from Kund-Barrier Road. It is totally incorrect that during preliminary inquiry planning of registration of bogus case or obtaining any illegal gratification/bribe was ever proved. Nothing wrong has been proved against him. Appellant did all that was actually happened. Appellant did not know the accused, and had no previous relation or enmity etc with accused. Allegations are baseless, false, fabricated and based on malafide having no nexus with truth.

9. That appellant has discharged his assigned duties with zeal, zest, devotion, dedication and honesty. There is nothing wrong on his part. The extreme major punishment of dismissal from service awarded to the appellant is wrong, against the facts in whimsical and cursory manner, illegally and without lawful authority hence liable to be set aside.
10. That appellant has rendered more than ~~12~~ years service and always performed his duties with devotion, dedication and honesty and never provided a chance of reprimand to his officers and having good service record at his credit.
11. That if the appellant is afforded with the opportunity of personal hearing he will really prove herself as innocent by adducing credible facts of the matter.

Attested



(21)

It is, therefore, requested that order dated 10-06-2021 of the District Police Officer Abbottabad may graciously be set aside and the appellant be re-instated in his service from the date of dismissal with all consequential service back benefits. The appellant shall pray for your long life and good health.

Your Obedient Servant

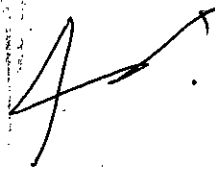

(Majid Ali)

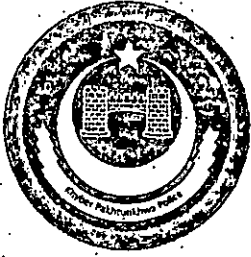
Ex-Constable No. 351
District Police Haripur

ADDRESS: Village: Sector No. 2,
Khalabat Township (KTS)
Haripur
Cell No. 0344-7555612

Dated: 21-06-2021

Attested





22

Annex - J

OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

0345-9560687

NO: 18560 /PA DATED 12/08/2021

ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Majid Ali No.351 of District Abbottabad against the order of punishment i.e. *Dismissal from service* awarded by DPO Abbottabad vide OB No.184 dated 10.06.2021.

Brief facts leading to the punishment are that the appellant while posted as constable at PS Nawansher registered a fake/bogus case vide FIR No.139 dated 07.03.2021 u/s 15AA PS Nawansher while on the same day the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkha Sokari Bannu was also charged in murder case vide FIR No.178 dated 07.03.2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that the appellant along with IHC Shehzad Shah reached Kokhar Maira interchange to receive the accused in protocol under the direction of SHO while the interchange is out of jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/bribe was proved against him.

The appellant was issued charge sheet along with summary of allegations and SP Investigation, Abbottabad was deputed to conduct formal departmental enquiry. The EO after enquiry proceedings held him responsible of misconduct and recommended for major punishment. He was issued final show cause notice and heard in person by the competent authority; however he failed to advance any cogent reason in his defense. Consequently, DPO Abbottabad awarded him major punishment of dismissal from service. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO Abbottabad were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. However, he could not bring forward any evidence or plausible justification in his defense. Thus, the disciplinary action taken by the competent authority seems genuine and appeal liable to be dismissed. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby *filed* with immediate effect.

Mirvais Niaz (PSP)

REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

No. 18561 /PA, dated Abbottabad the 12/08 /2021.

CC:

1. DPO Abbottabad for information and necessary action with reference to his office Memo No 1644/Legal dated 12-07-2021. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.

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

SERVICE APPEAL No. 7392/2021.

Majid Ali (Ex-Constable No. 351 Police, Abbottabad) R/O Sector No. 02, Khalabat
Township, (KTS) Tehsil & District Haripur.

.....Appellant.

VERSUS

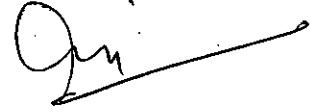
1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Abbottabad.

.....Respondents.

Para wise comments on behalf of Respondents.

INDEX.

S.No.	Detail of Documents	Annexure	Page No.
1	Reply	-	1 to 3
2	Affidavit	-	4
3	Charge sheet, statement of allegations.	"A & A-1"	5 & 6
4	Order No. 184 Dated 10.06.2021	"B"	7
5	Order No. 18560/ PA dated 12.08.2021	"C"	8
TOTAL		-	8 Pages



DSP Legal, Abbottabad.

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

SERVICE APPEAL No. 7392/2021

Majid Ali (Ex-Constable No. 351 Police, Abbottabad) R/O Sector No. 02, Khalabat Township, (KTS) Tehsil & District Haripur.

.....Appellant.

VERSUS

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

.....Respondents.

Para-wise comments by respondents.

Respectfully Sheweth

PRELIMINARY OBJECTIONS:-

1. That the instant Service Appeal is not maintainable in the present form.
2. That the appellant is estopped by his own conduct to file the instant appeal.
3. That the appellant has not come to the Hon'ble Tribunal with clean hands.
4. That the appellant has suppressed material facts from the Hon'ble Tribunal.
5. That the instant Service Appeal is not maintainable for non-joinder/miss-joinder of necessary and proper parties.
6. That the instant Service Appeal is barred by law and limitation.

ON FACTS:-

1. In reply to this para it is submitted that the appellant while posted in Police Station Nawanshehr a fake case vide FIR No. 139 dated 07.03.2021 u/s 155 AA KPK, PS Nawanshehr was registered against the accused Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari, District Bannu, who was also charged in case FIR No. 178 dated 07.03.2021 u/s 302/324/34 PPC, PS Cantt, District Bannu. Reportedly, the appellant alongwith Head Constable Shahzad Shah No. 756 reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of the PS Nawanshehr. Therefore, the appellant was issued charge sheet and statement of allegations vide District Police Officer, Abbottabad office No. 1207/PA Dated 02.04.2021. (Copies of charge sheet and statement of allegations are attached as Annexure "A & A-1").
2. In reply to this para, it is submitted that the appellant could not give satisfactory reply in response to the charge sheet.

3. In reply to this para, it is submitted that proper departmental enquiry was conducted. The appellant joined the enquiry proceedings and all legal and codal requirements were fulfilled during the course of inquiry.
4. Incorrect, respondent No. 03 took into consideration all facts, circumstances and relevant evidence which proved the misconduct of the appellant. Consequently, the appellant was awarded major punishment of dismissal from Service vide OB No. 184 dated 10.06.2021. (Copy of order is attached as Annexure "B").
5. Incorrect. As explained in para No. 01 above.
6. In reply to this para, it is submitted that during fact finding inquiry conducted by the Addl SP Abbottabad upon the registration of fake case registered against the accused of heinous offence at District Abbottabad by the SHO, PS Nawanshehr, it came to the surface that appellant alongwith HC Shahzad Shah No. 756 reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO, while the interchange is out of the jurisdiction of the PS Nawanshehr. Therefore, upon charges of misconduct, appellant was awarded the major punishment of dismissal from Service.
7. Incorrect, as explained in preceding para.
8. Incorrect, the appellant filed departmental appeal against the order of punishment to the respondent No. 02, who considered the same and dismissed vide order No. 18560/PA dated 12.08.2021. (Copy of order is attached as the annexure "C").


ON GROUNDS:-

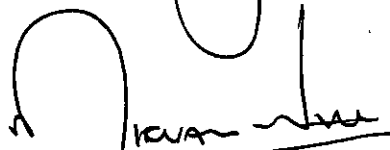
- a. Incorrect, both the orders are legal and in accordance with law/rules hence, liable to be remained intact.
- b. Incorrect, proper departmental inquiry was conducted by the respondents. The appellant joined the enquiry proceedings. He was given the right of personal hearing and self-defense. Having fulfilled all legal requirements the appellant was awarded the major punishment of Dismissal from Service.

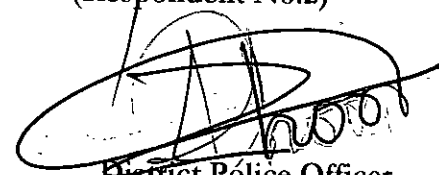
- c. Incorrect, that appellant alongwith HC Shahzad Shah No. 756 reached at Khokhar Maira Interchange to receive the accused already charged in criminal case at District Bannu in protocol under the direction of SHO who registered a fake case against the accused in this district. Therefore, the matter was thoroughly probed and appellant was held guilty of gross misconduct.
- d. In reply to this para, it is submitted that the appellate authority took into consideration all facts, circumstances and relevant evidence, while rejecting the departmental appeal of the appellant. Therefore, the order of punishment is lawful and maintainable.
- f. Incorrect, the instant service appeal is badly time barred and not maintainable under the law.

PRAYER.

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


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


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


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

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

SERVICE APPEAL No. 7392/2021

Majid Ali (Ex-Constable No. 351 Police, Abbottabad) R/O Sector No. 02, Khalabat Township, (KTS) Tehsil & District Haripur.

.....Appellant.

VERSUS

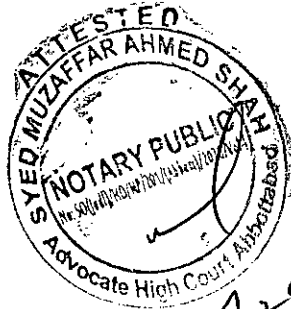
1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Abbottabad.

.....Respondents.

AFFIDAVIT.

We, do hereby affirm on oath that the contents of written reply are true to the best of our knowledge & belief and nothing has been concealed from the honorable Service Tribunal.

Submitted please.



17/09/2022

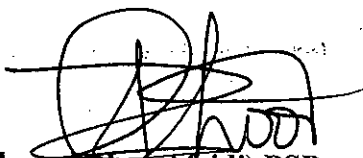
[Signature]
 Provincial Police Officer,
 Khyber Pakhtunkhwa,
 Peshawar.
 (Respondent No.1)

[Signature]
 Regional Police Officer,
 Hazara Region, Abbottabad
 (Respondent No.2)

[Signature]
 District Police Officer,
 Abbottabad.
 (Respondent No. 3)

CHARGE SHEET

- 1). I, **Zahoor Babar Afridi (PSP) District Police Officer Abbottabad** as competent authority hereby charge you **FC Majid No. 351 PS Nawansher** as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police Disciplinary Rules 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet to the Enquiry Officer.
- 4). Your written defense, if any shall reach the Enquiry Officer with in the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- 5). Intimate whether you desire to be heard in person or otherwise.
- 6). A statement of allegations is enclosed.


(Zahoor Babar Afridi) PSP
District Police Officer
Abbottabad

(6)

Annex - A-1


DISCIPLINARY ACTION

I, Zahoor Babar Afridi (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you FC Majid No. 351 PS Nawansher rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975 (amended 2014):

STATEMENT OF THE ALLEGATIONS

I. As per preliminary enquiry conducted by Addl. SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, you FC Majid No. 351 while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 138 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that you alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against you. All this shows your malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975, hence charge sheeted.

- 2). For the purpose of scrutinizing your conduct with reference to the above allegations, SP, Inv. A-2 is hereby appointed as Enquiry officer.
- 3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to you, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action against you.
- 4). You are hereby directed to attend the proceedings on the due date, time and place fixed by the Enquiry Officer.


(Zahoor Babar Afridi) PSP
District Police Officer
Abbottabad

No: 129 /PA, Dated Abbottabad the 02/04/2021.

Copy to:

1. Enquiry Officer for initiating proceedings against the defaulter officer under provisions of the Police Disciplinary Rules 1975 (amended 2014) and submit findings within stipulated period.
2. FC Majid No. 351 PS Nawansher (delinquent officer/ official).

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Annex-B

ORDER

This office order will dispose off the departmental enquiry against FC Majid No. 351. As per preliminary enquiry conducted by Addl. SP Abbottabad vide his office memo No. 1317/PA dated 01-04-2021, he while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 178 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that he alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against him. All this shows his malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975.

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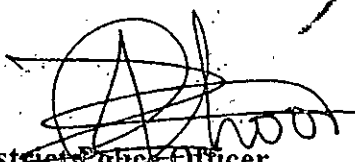
He was issued with Charge Sheet along with statement of allegations. SP Investigation Abbottabad was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings wherein he reported that the allegations level against delinquent official are proved correct. He was issued with Final Show Notice. He was summoned to appear in Orderly Room on 09-06-2021. He was given a patient hearing but he had nothing plausible to state in his defence.

Accepted
 Addl. Superintendent
 Police Abbottabad

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, Zahoor Babar Afridi, PSP, District Police Officer, Abbottabad as a competent authority, am constrained to award him the punishment of Dismissal from Service with immediate effect.

Order announced.

OB No. 184
 Dated 10-6-21


 District Police Officer
 Abbottabad

CC.

1. Pay Officer DPO Office.
2. SRC DPO Office.
3. OHC DPO Office alongwith Enquiry containing (41) pages for completion of record.



28
Amree - C
OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.pohazara@gmail.com

0345-9560687

NO: 18560 / PA DATED 12 / 08 / 2021

ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Majid Ali No.351 of District Abbottabad against the order of punishment i.e. *Dismissal from service* awarded by DPO Abbottabad vide OB No.184 dated 10.06.2021.

Brief facts leading to the punishment are that the appellant while posted as constable at PS Nawansher registered a fake/bogus case vide FIR No.139 dated 07.03.2021 u/s 15AA PS Nawansher while on the same day the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkha Sokari Bannu was also charged in murder case vide FIR No.178 dated 07.03.2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that the appellant along with IHC Shehzad Shah reached Kokhar Maira interchange to receive the accused in protocol under the direction of SHO while the interchange is out of jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/bribe was proved against him.

The appellant was issued charge sheet along with summary of allegations and SP Investigation, Abbottabad was deputed to conduct formal departmental enquiry. The EO after enquiry proceedings held him responsible of misconduct and recommended for major punishment. He was issued final show cause notice and heard in person by the competent authority; however he failed to advance any cogent reason in his defense. Consequently, DPO Abbottabad awarded him major punishment of dismissal from service. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO Abbottabad were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. However, he could not bring forward any evidence or plausible justification in his defense. Thus, the disciplinary action taken by the competent authority seems genuine and appeal liable to be dismissed. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby filed with immediate effect.

Mirvais Niaz (PSP)

REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

No. 18561 / PA, dated Abbottabad the 12/08 / 2021

CC.

1. DPG Abbottabad for information and necessary action with reference to his office Memo No 1644/Legal dated 12-07-2021. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.

Attested
K S

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

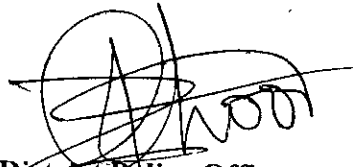
No: 212/PA, Dated Abbottabad, the 04/08/2021.

GROUND OF ACTION

That you **FC Majid No. 351**, committed following misconduct:-

- I. As per preliminary enquiry conducted by Addl: SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, you FC Majid No. 351 while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 178 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that you alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against you. All this shows your malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules-1975:-
- II. During proper departmental enquiry the allegations have been proved against you.

By reasons of above you have rendered yourself liable to be proceeded under Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014), hence these grounds of action.


District Police Officer
Abbottabad

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

No: 212/PA, Dated Abbottabad, the 09/08/2021.

FINAL SHOW CAUSE NOTICE

(Unit Rule (3) KPK Police Rules, 1975 amended 2014)

1. That you **FC Majid No. 351** rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) for following misconduct;

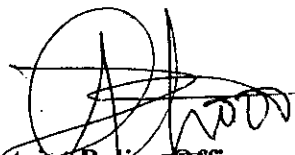
I. As per preliminary enquiry conducted by Addl: SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, you FC Majid No. 351 while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs-a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 178 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that you alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against you. All this shows your malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975:-

II. During proper departmental enquiry the allegations have been proved against you.

2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of enquiry officer;
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the police force will amount to encouragement of inefficient Police officers;
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
6. You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975(amended 2014) for the misconduct referred to above.
7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.
9. Grounds of action are also enclosed with this notice.

Received by

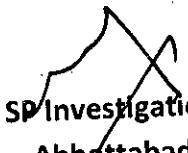



District Police Officer
Abbottabad

**DEPARTMENTAL ENQUIRY AGAINST FC MAJID NO. 351 THE THEN GD PS
NAWANSHER DISTRICT ABBOTTABAD.**

INDEX

No.	DETAIL OF PAPERS	PAGE NO.	REMARKS
1.	Enquiry report along with covering letter.	1-6	Certified that this
2.	Charge Sheet & Summary of allegations issued by W/DPO ATD	7-8	Enquiry Report
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4.	Statements of MHC Waséem Ayub No. 1217, HC / AMHC Muhammad Niaz No. 1456, LHC/MM Nadeem Qadir No. 1267, FC Zeeshan No. 740, FC Sheraz No. 1132 and FC Nazar Muhammad No. 183 Control Room, Abbottabad.	12-29	pages having no
5.	Copy of FIRs PS Cantt District Bannu and PS Nawansher District Abbottabad.	30-31	cutting / over
	Total	31	writing on this index.


 SP Investigation,
 Abbottabad.
 Superintendent of Police
 Investigation, Abbottabad



Phone: 0992-9310046
Fax: 0992-9310047

P-4

Office of the Superintendent of Police, Investigation Abbottabad.

No: 314 / PA/Inv: dated Abbottabad the, 03/06/2021

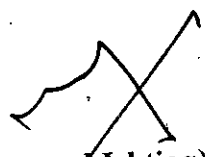
To: The District Police Officer,
Abbottabad.

Subject: **DEPARTMENTAL ENQUIRY AGAINST FC MAJID NO.
351 THE THEN GD PS NAWANSHER DISTRICT
ABBOTTABAD.**

Memo:

Kindly refer to your good office Endst No: 129/PA
dated 02-04-2021 on the subject cited above.

Enclosed kindly find herewith departmental enquiry report
along with enclosures in respect of FC Majid No. 351 the then GD PS Nawansher,
for favour of kind perusal please.


(Muhammad Ishtiaq)
Superintendent of Police,
Investigation, Abbottabad.

1-5

**DEPARTMENTAL ENQUIRY AGAINST FC MAJID NO. 351 THE THEN
GD PS NAWANSHER PRESENTLY POSTED IN POLICE LINES
DISTRICT ABBOTTABAD.**

ALLEGATIONS:-

Vide charge sheet & summary of allegations No: 129/PA dated 02-04-2021 issued by your good office for the purpose of scrutinizing the conduct of FC Majid No. 351 with the allegations that "while he was posted as GD PS Nawansher, on 07-03-2021 at 1935 hours a fake / bogus case vide FIR No. 139 dated: 07-03-2021 u/s 15-AA / KPK PS Nawansher. While on the same day at 1715 hours the same accused namely Hazrat Gul s/o Bahadur Gul r/o Kotkah Sokari Banu was also charged in murder case vide FIR No. 178 dated: 07-03-2021 u/s 302/324/34 PPC PS Cantt District Banu, how is it possible that the accused is charged in two FIRs at the same time and date in two very far away districts. During cross examination it came to the surface that you along with IHC Shahzad Shah reached at Kokhar Mera Interchange to receive the accused in protocol under the direction of SHO, while the interchange is out of the jurisdiction of PS Nawansher. During preliminary enquiry the allegation of pre-planning in registering bogus case and obtaining a illegal gratification / bribe has been proved, which tantamount to gross misconduct". The undersigned was appointed as enquiry officer.

PROCEEDINGS:-

After the receipt of enquiry papers the record was thoroughly examined and the delinquent Official was called upon / summoned, heard in person, ample opportunity was given to him and a session of cross question was also made. The statements of the following were recorded which are placed on file.

1. HC Waseem Ayub MHC PS Nawansher.
2. LHC Nadeem Qadir MM PS Nawansher.
3. HC Muhammad Niaz AMHC PS Nawansher.
4. Constable Nazar Muhammad No. 183 Control Room Police Lines.
5. Constable Zeeshan No. 740 GD PS Nawansher.
6. Constable Sheraz No. 1132 GD PS Nawansher.

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1. STATEMENT OF DELINQUENT OFFICIAL FC Majid No. 351

The delinquent official stated in his statement that on 7-03-2021 at 1855 hours he along with SHO and police party was present on routine patrolling near Kund barrier road, meanwhile on seeing police party a person tried to decamp from the spot. Being suspect police party arrest him and during his body search recovered one 30-bore pistol along with 10 cartridges from his possession. He disclosed his name as Hazrat Gul s/o Bahadur Gul r/o Kotkah Sokari Banu. After arresting the accused SHO PS Nawansher prepared Marasla for registration of FIR and handed over to me along with accused. He further stated that the allegations leveled against him are based on personnel enmity, fake and baseless. He has no role / concern with the registration of said FIR, it is totally wrong to say that he along with IHC shahzad No. 756 went to Khokhar Mera interchange to received the said accused or giving him any protocol.*He is totally unaware regarding taking bribe or any pre-paining. He further prayed to file the charge Sheet.

2. STATEMENT OF HC WASEEM AYUB MHC PS NAWANSHER

He stated in his statement that on 07-03-2021 due to an emergency he went to his home on the permission of SHO. When he returned back a case vide FIR No. 139 dated: 07-03-2021 u/s 15-AA / KPK PS Nawansher was already registered. He did not know any information about the incident.

3. STATEMENT OF LHC NADEEM QADIR MM PS NAWANSHER.

He stated in his statement that on 07-03-221 he along with additional Moharrar HC Muhammad Niaz was present in the Moharrar office. SHO ordered him to keep pending the Roznamcha as he has to registered an FIR. On the order of SHO he kept the Roznamcha pending. On 08-03-2021 at about 4:30am or 05:0am while he was sleeping SHO gave him a Marasla and directed to chalked the confinement of involved accused and also register the FIR. He brought into the notice of SHO that Control Room does not write daily progress after 12 O'clock. On this SHO personally informed the control room through his mobile phone that he has to register an FIR u/s 15-AA and asked him to add the said case in morning report. Operator Gulfam posted at Control Room informed the SHO that operator Nazar Shah has been slept, he will brought into his notice and he will add the said case in the morning. On the order of SHO he has chalked the FIR vide No. 139 dated: 07-03-2021 u/s 15-AA / KPK PS Nawansher.

4. **STATEMENT OF HC MUHAMMAD NIAZ AMHC PS NAWANSHER**

He stated in his statement that on 07-03-2021 while he was present in Moharrar office. At evening time SHO came to Moharrar office and asked him to keep the Roznamcha pending as he has to register an FIR. He remained present in the office of Moharrar office till 12:00am and after conveying the whole FIRs of day to Control Room he went to sleep in his room. After him MM LHC Nadeem Qadir was present on duty in Moharrar office. The said case was not registered in his presence.

5. **STATEMENT OF CONSTABLE NAZAR MUHAMMAD NO. 183 CONTROL ROOM POLICE LINES.**

He stated in his statement that on 07-03-2021 while he was receiving the information regarding registration of cases in different police station of District Abbottabad. At about 11:30 pm additional Moharrar PS Nawansher conveyed him the details of cases from FIR No. 135 to 138. On 08-03-2021 at 07:30am LHC Nadeem Qadir MM PS Nawansher conveyed the details of FIR No. 139 dated: 08-3-2021 u/s 15-AA /KPK PS Nawansher.

6. **STATEMENT OF CONSTABLE ZEESHAN NO. 740 GD PS NAWANSHER.**

He stated in his statement that on the day of occurrence he was present at Ghari Phana Chowk Nawansher on routine patrolling along with SHO PS Nawansher, IHC Shahzad Shah, FC Majid and FC Sheraz No. 1332. In the meanwhile he received a mobile call from his brother that his father was ill and his brother brought him to hospital. He brought the said information into the notice of SHO and after obtaining permission proceeded towards the hospital.

7. **STATEMENT OF CONSTABLE SHERAZ NO. 1132 GD PS NAWANSHER.**

He stated in his statement that at the day of occurrence he was present at Ghari Phana Chowk Nawansher on routine patrolling along with SHO PS Nawansher, IHC Shahzad Shah, FC Majid No. 351 and FC Zeeshan No. 740. Due to an emergency after obtaining permission from SHO he went to his home.

OBSERVATIONS

During the course of enquiry the undersigned has observed the following facts: -

1. During cross question session the witness of the "Fard" Constable Sheraz No. 1132 stated that his name was included

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in the "Fard" but neither he was present on the spot nor he has signed on the "Fard".

2. The witnesses of the "Fard" did not verify their presence in the Marasla.
3. CDR of all the relevant person was collected in previous preliminary enquiry which revealed that IHC Shahzad Shah, Constable Majid, Gunner SHO Faisal Shah reached to the Kokhar Maira Interchange as indicated in the CDR, which clearly indicates that he received the accused in protocol under the direction of SHO from Kokhar Maira Interchange (out of jurisdiction of PS Nawansher). Similarly, several suspect numbers are also found in the CDR of SHO Faisal Shah and his gunner.
4. Similarly, During the proceeding of previous preliminary enquiry in cross questioning IHC Shahzad Shah confessed that he has visited to Kokhar Maira Interchange at the day of occurrence on 08-03-2021 which is also found suspicious and proves that IHC Shahzad Shah and Constable Majid (Gunner) received accused from Muslimabad Interchange.
5. As the accused Hazrat Gul s/o Bahadur Gul belongs to a far away district Bannu and his sudden arrival in District Abbottabad is also a question mark
6. The arrest point of the accused was showed in FIR is Kund Barrier, Thandiani Road which was cross checked with CDR of all Police personnel including SHO, which is not found correct.
7. The arrival / departure of SHO Faisal Ali Shah in Daily Roznamcha were check and found that although SHO has mentioned about the incident i.e. recovery of Arms & Ammunition etc but he did not mentioned to whom he handed over the recovered arm & ammunition. Similarly, Moharrar was also unaware about the entire episode.
8. It is also astonishing that initially a person made confined himself in PS lockup u/s 15 AA/KPK, as the said offence is bail able the accused despite of making arrangements for guarantors in respect of his bail, he preferred to go in judicial remand. It is also a question mark.
9. Statement of LHC Nadeem Qaider No.1267 (Muharrir staff) revealed that SHO told them to keep the Roznamcha pending and after it he was directed to register case on Murasala report on 08-03-2021 at round about 04:00/05:00 Am. Meant


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the FIR. This statement also speaks that case was registered on bogus grounds with malafide intentions.

10. It is also surprising that how two different FIRs are lodged against the same accused on the same date and time in two far away districts.

RECOMMENDATION: -

Keeping in view of above facts & circumstances and as per statements of concerned officials all the allegations leveled against FC Majid No.351, the then GD PS Nawansher are stand proved. As on the direction of SHO he with the help of IHC Shahzad Shah No. 756 are directly found guilty in pre-planning the matter with accused Hazrat Gul, who was charged in Murder case in FIR No.178 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt District Bannu and the accused Hazrat Gul s/o Bahadur Gul tried to established alibi with the help of SHO, IHC Shahzad Shah and Constable Majid in registering bogus case vide FIR No.139 u/s 15AA dated 07-03-2021 PS Nawansher by some unknown means in order to damage the Murder case registered in District Bannu. Hence as per the statements of the officials, CDR analysis, record of the police station and cancellation of the case proved him guilty. Therefore, keeping in view of above Constable Majid No. 351 (delinquent Official) is hereby recommended for **Major Punishment** for creating embracement for the Department for some ulterior motives.

Submitted please.


(MUHAMMAD ISHTIAQ)
Superintendent of Police,
Investigation, Abbottabad.

PA


Issue

~~FSCN~~
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CHARGE SHEET

- 1). I, **Zahoor Babar Afridi (PSP) District Police Officer Abbottabad** as competent authority hereby charge you **FC Majid No. 351 PS Nawansher** as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police Disciplinary Rules 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet to the Enquiry Officer.
- 4). Your written defense, if any shall reach 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 follow against you.
- 5). Intimate whether you desire to be heard in person or otherwise.
- 6). A statement of allegations is enclosed.


(Zahoor Babar Afridi) PSP
District Police Officer
Abbottabad

DISCIPLINARY ACTION

I, **Zahoor Babar Afridi (PSP) District Police Officer** **Abbottabad** as Competent Authority of the opinion that you **FC Majid No. 351 PS Nawansher** rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975 (amended 2014):


STATEMENT OF THE ALLEGATIONS

I. As per preliminary enquiry conducted by Addl: SP Abbottabad vide his office memo: No. 1317/PA dated 01-04-2021, you **FC Majid No. 351** while posted at PS Nawansher, on 07-03-2021 at 19:35 hrs a fake/ bogus case vide FIR No. 139 dated 07-03-2021 u/s 15AA was registered at PS Nawansher while on the same day at 17:15 hrs the same accused namely Hazrat Gul s/o Bahadar Gul r/o Kotkah Sokari Bannu was also charged in murder case vide FIR No. 138 dated 07-03-2021 u/s 302/324/34 PPC PS Cantt district Bannu, how is it possible that the accused is charged in two FIRs at the same time and date in two very faraway districts. During cross examination it came to the surface that you alongwith IHC Shahzad Shah reached at Khokhar Maira Interchange to receive the accused in protocol under the direction of SHO while the interchange is out of the jurisdiction of PS Nawansher. Furthermore, the allegations of preplanning in registering bogus case and obtaining of illegal gratification/ bribe has been proved against you. All this shows your malafide intention, sever violation, a senior professional dishonesty and gross misconduct in term of police E&D Rules- 1975, hence charge sheeted.

2). For the purpose of scrutinizing your conduct with reference to the above allegations, SP, Inv: A-7 is hereby appointed as Enquiry officer.

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

4). You are hereby directed to attend the proceedings on the due date, time and place fixed by the Enquiry Officer.


(Zahoor Babar Afridi) PSP
District Police Officer
Abbottabad

No: 129 /PA, Dated Abbottabad the 02/04 /2021:

Copy to:

1. Enquiry Officer for initiating proceedings against the defaulter officer under provisions of the Police Disciplinary Rules 1975 (amended 2014) and submit findings within stipulated period.
2. **FC Majid No. 351 PS Nawansher** (delinquent officer/ official).

گورنمنٹ ہائی اسکول - اونیورسٹی کمپلکس آف ایبٹ آباد (انڈیا گارڈ)

لوہر پورہ چارج شیڈول نمبر 129/14 فورم 54-2021

ضلع لاہور - گذشتہ روز - کہ چارج شیڈول نمبر 129/14
میں سے ایک شخص کو قتل کر دیا گیا۔

1۔ 12 فورم 54-2021 وقت تقریباً 19:35 بجے 19 سالہ ڈیو لالہ نے اپنے
ذرا تھکے ہوئے منہ سے ایک گولی نکالی جو اس کے منہ سے نکلی
گئی اور وہ اس کے منہ سے نکلی۔ اس کے منہ سے نکلی گولی
اس کے منہ سے نکلی۔ اس کے منہ سے نکلی گولی اس کے
منہ سے نکلی۔ اس کے منہ سے نکلی گولی اس کے منہ سے
نکلی۔ اس کے منہ سے نکلی گولی اس کے منہ سے نکلی۔
اس کے منہ سے نکلی گولی اس کے منہ سے نکلی۔ اس کے
منہ سے نکلی گولی اس کے منہ سے نکلی۔ اس کے منہ سے
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گولی اس کے منہ سے نکلی۔ اس کے منہ سے نکلی گولی
اس کے منہ سے نکلی۔ اس کے منہ سے نکلی گولی اس کے
منہ سے نکلی۔ اس کے منہ سے نکلی گولی اس کے منہ سے
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ATTESTED
Superintendent of Police
Investigation, Abbottabad

فردانہ طور پر - اس کے منہ سے نکلی گولی اس کے منہ سے
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نکلی۔ اس کے منہ سے نکلی گولی اس کے منہ سے نکلی۔

XXX غلطی بدوز و نجوم مقدم عدالت 139/21 جرم 15AA گھانہ خوالہ
آب کہاں تھے

جواب :- میں SHO کے ہمراہ تھا پورے سین ٹیڈ کنڈیسر میں مقدمہ نمٹا رہا تھا

XXX غلطی :۔ مقدمہ حضرت محل کیس جگہ (مقام) سے کس وقت گرفتار کیا

جواب :- مقدمہ حضرت محل کو عورم 21/07/07 کو کنڈیسر میں گرفتار کیا گیا تھا

XXX بدوز و نجوم آب SHO کے پاس کی رہا ہے یہ ہمراہ IHC اختیار ارٹناہ
افترا بھیج یہ مقدمہ کو لے کر گیا ہے

جواب :- نہیں جی

XXX آپ یہ جارحہ سٹیٹ یہ لگا یا گیا الزام کے آگے کے محل کر
ریٹر ملازمان کے ہمراہ ایک سوچے سمجھے منصوبے کے تحت عملدرآمد

مقدمہ کو بنوں مقدمہ سے بچانے کی خاطر مقدمہ منسوخ سے ایک بھاری
رقم بطور رشوت وصول کی کیا ہے ؟

جواب :- نہیں جی یہ صحت کورٹ میں ہے میں نہ علم ہوں

XXX دوران جامع تگدشی مقدمہ سے کیا کیا اشیاء بدوز و نجوم میں

جواب :- سیری و جوڑگی میں اختیار ارٹناہ IHC نے دوران جامع تگدشی یہ
ڈاکٹس سٹیٹل 30 پور بدوز عدالت

XXX بدوز و نجوم ایک باس کو فنی گھاڑی فنی سرکاری بائو انٹیویٹ
جواب :- بائو انٹیویٹ گھاڑی

XXX مقدمہ رہید ہونے کے بعد سب سے پہلے اطلاع کیس وری گئی ہے

جواب :- نجوم کی اطلاع SHO نے صاحب خان کو اس کے محل بدوز و نجوم

XXX بدوز و نجوم ایک باس کے استعمال و مائل پٹریز کون سے تھے ؟

جواب :- صاحب باس و مائل پٹریز 0321-5865549 تھا

XXX آپ یہ لگا یا گیا الزام آپ نے ہماری رشوت سکر جمعونا مقدمہ
رہید کرنے میں ریٹر ملازمان کا ساتھ دیا ہے کیا ہے ؟

جواب :- نہیں یہ جمعونا ہے

ATTESTED

صاحب علی 351



Superintendent of Police
Ahottabad

ضلع ایبٹ آباد

15 ذوالحجہ

نقل ریل 47 صدر روزنامہ 08/03/21

08/03 08:10 وقت سے اس وقت میں جے ٹی سی کے ساتھ
 کے رفقہ جو الوداعی 33 بالا بعد از سفر گفت گوت دیگر کارس کار حدود
 چکانہ سے و اس آریا ہوں۔ چکانہ سے روانہ ہو کر سری روڈ۔ جے ٹی سی کے ساتھ
 وغیرہ۔ PMA روڈ ٹھنڈی پانی روڈ وغیرہ میں گت کی گئی۔ دوران گفت
 کنندہ پیر پٹر روڈ پر موجود تھا کہ ایک شخص فٹنہ حالت میں ملاقی
 ہوا۔ جس کو فالو میں کرنا شکی کی بنا پر جانے ملاشی حسب ضابطہ عمل
 میں لائی۔ دوران ملاشی مذکورہ کے پڑھا مشوار سے ایک ضرب پٹیل
 30 پور پٹیری - 2264 2906 سے 10 ضرب کارٹوس کے پڑھے
 ہوا۔ دریافت ہر مذکورہ سے اپنا نام حضرت گل ولد بہادر گل مخم
 یستون سکے کہ حکم سوری بیٹوں بتلایا۔ اللہ ایچون شین برے فر
 قضا پور میں کر کے مذکورہ کو سرنگب صبر بالا کا پیکر حسب ضابطہ اعتبار
 کر کے عدالت برے انڈر این صف ارسال کیا۔ بعد جے ٹی سی
 کے ساتھ ایک کپا کر پادایات ضابطہ ہوگی ہیں۔ دیگر گت
 کے بعد انبیان سے اسے ایچون شین دست طور پر داخل کر کے روایا گیا۔

ISAA
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ATTESTED
 Superintendent of Police
 Investigation, Abbottabad

جناب عالی!

نقل بطریق اصل

یون
 PMA-PS-NSP
 08-03-021

ضلع ایس آبیاد

نقل ریل گاڑی روزنامہ 07/03/21
33

روانگی فصل شاہ 5110 07/03/21 وقت 18:55 بجے اس وقت میں ہے
سید شاہ شاہ 1110- کراچی آڈیشن 740- سید شاہ شاہ 1132- حاجہ 351 کے
درست باوردی باصلہ بغرض اس گیسٹ دیگر کارسنگار روانہ ہو
ایس کا بیوٹا ہوں۔

نقل بطابق اصل
MM-PS-NSR
07-03-21

ATTESTED
Superintendent of Police
Investigation, Abbottabad

آفسر تریب ایرج سید عرفان ASI 07/03/21 وقت 20:40 بجے اس وقت
میرپور قاسم سید تریب فصل شاہ 5110 بدست حاجہ 351 واصل ہو کر
میرپور قاسم 139 جی ایس آئی کی جاگیدگی سے روکائی جاتی ہے۔

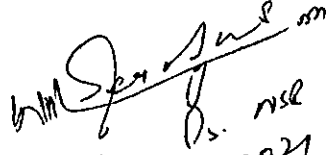
نقل بطابق اصل
MM-PS-NSR
07-03-21

خانہ تریب ایرج ASI 07/03/21 وقت 20:50 بجے اس وقت سے روانہ
تریب ایرج وقت پر روانہ ہوا۔ بالا کی جاگیدگی سے روکائی جاتی ہے
بغرض تفتیش وقت سید شاہ شاہ 1110 بجے اس طرح قاسم سید تریب
بندش قائم کی بعد سے مکررہ حاجہ 351 سے روکائی جاتی ہے۔

نقل بطابق اصل
MM-PS-NSR
07-03-21

بیان و سیم ایچ بی 1217 حال ترمیم قضاة قوال 142

حرفاً بیان پر نام حرف 03/07 کو جو کہ گورنر ایچ بی سے کیا گیا ہے۔ صاب۔ 500۔ جو کہ قریب 1500
 جب وہ ایچ بی قضاة آنا تو قضاة عدالت 139 حرف 03/07 صاب کلا 1500 قضاة قوال
 FIR درج شدہ ہے۔ معروضہ زبیر علی خان نے۔ عدالت حرف 03/07 کی قضاة سے ملزم کو جو کہ
 31/03 کو گرفتار اور قضاة قضاة قوال کو گرفتار کیا گیا ہے۔ قضاة عدالت کے تعلق میں ملزم
 اور ملزم کے خلاف اور عدالت FIR عدالت کے خلاف گرفتار کیا گیا ہے۔ قضاة عدالت کے تعلق میں ملزم
 ملزم کے خلاف گرفتار کیا گیا ہے۔ قضاة عدالت کے تعلق میں ملزم گرفتار کیا گیا ہے۔ قضاة عدالت کے تعلق میں ملزم


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 28.04.2021

ATTESTED

 Superintendent of Police
 Investigation, Abbottabad

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مدارن اطلاعاتی راپورٹ
 عدالت عالیہ راولپنڈی، راپورٹ نمبر 153 مورخہ 24 جولائی 1953

تاریخ	19/07/53
موضوع	موت محمد علی صاحب
نمبر	(178)
موت	18/07/53
پیدائش	14/05/05
پتہ	34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100
پتہ	پتہ 34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100
پتہ	پتہ 34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100
پتہ	پتہ 34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100

ابتدائی اطلاع پانچ دنوں کے بعد دی گئی۔ راجپوت قبیلہ کے ایک شخص نے اطلاع دی کہ محمد علی صاحب نے 18 جولائی 1953ء کو راولپنڈی میں انتقال کیا۔ محمد علی صاحب کی پیدائش 14 مئی 1905ء کو ہوئی تھی۔ ان کا تعلق راجپوت قبیلہ سے ہے۔ ان کی تعلیم ابتدائی سطح پر ہوئی تھی۔ ان کی شادی ایک عورت سے ہوئی تھی۔ ان کے دو بچے تھے۔ ان کی وفات کے بعد ان کی جائیداد تقسیم ہو گئی تھی۔ ان کی وفات کے بعد ان کی جائیداد تقسیم ہو گئی تھی۔ ان کی وفات کے بعد ان کی جائیداد تقسیم ہو گئی تھی۔

ATTESTED
 Superintendent of P. Investigation, Abbottabad

7-3-201

نقل رپورٹ 47 وفد روزنامہ 08/03/021

47

والیجا فصل شاہ 5110 08/03 وقت 00:10 بجے اس وقت میں فصل شاہ
 کے رفیق بھائیوں 33 بالا بعد از قتل گشت دیگر کارس کارس
 کمانڈنگ آفیسر آرائیوں۔ کمانڈنگ آفیسر اوائلہ ہو کر صری روڈ۔ جلا کالہ شاہ
 وغیرہ۔ PMA روڈ کھنڈ پالی روڈ وغیرہ میں گشت کی گئی۔ دوران گشت
 کھنڈ پیر پٹر روڈ پر موجود تھا کہ ایک شخص مشتبہ حالت میں علاقہ
 ہوا۔ جس کو قاپو میں کر کے شکی کی بناء پر جامعہ تلاشیا حسب ضابطہ عمل
 میں لائی۔ دوران تلاشیا منہ کو راہ کے بڑھکا شہوار سے ایک ضرب پٹیل
 30 پور پٹیری - 4 226 2906 سے 10 ضرب کارٹوس کے پرائف
 ہوا۔ دریافت ہر منہ کو راہ سے اپنا نام حضرت گل ولد بہادر گل قنوم
 پٹیل سکتے کو حکم سوری بیٹوں بتلایا۔ اللہ ایچون پٹیل پور پٹیری
 قبضہ لیا گیا کہ منہ کو راہ کو منہ لگے جبر بالاکا پاکر حسب ضابطہ گرفتار
 کر کے عدالت پور پٹیری لایا۔ صرف ارسال کما۔ بعد از پٹیل
 بازار چو کیداران کو چیک کیا جائے یا ایات ضابطہ ہوگی ہیں۔ دیگر حقیقت
 گزری۔ بعد اسیان سے اسے ایچون پٹیل دست طور پر داخل کوٹ روایا گیا۔

ISAA

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پٹیل

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کارٹوس

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Superintendent of Police
Investigation, Abbottabad

جناب عالی!

نقل بطاعتی اصل

08-03-021
MIA-PS-NSP

گھانڈہ لٹوال سپر

22

نقل ریل گاڑی 33
روزنامہ 07/03
021

33
روانگی فیصل شاہ SHD 07/03 وقت 18:55 بجے اس وقت میں سے
شہزاد شاہ 111C کی نقل ڈپیمان 740 سیراز 1132- حاجہ 351 کی
درست باوردی باصلہ بغرض لڑنے گشت دیگر کار سیکار روانہ حدود
گھانڈہ کا ہیونما ہوں۔

جناب عالی!

نقل عطائی اصل
107
MM-PS-NSR
07-03-021

38
آفسر ٹیب پیرجہ سنیف الرحمن ASI 07/03 وقت 20:40 بجے اس وقت
محمد پیر کا مہرا لہ فرنیہ فیصل شاہ SHD بدست حاجہ 351 فوٹو لہ ہو کر
وقت 139 جیم ایس آئی/15AA کی چاکہ کی شروع کی جاتی ہے۔

جناب عالی!

نقل عطائی اصل
107
MM-PS-NSR
07-03-021

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Investigation, Abbottabad

39
خانمہ ٹیب پیرجہ ASI 07/03 وقت 20:50 بجے اس وقت شروع شدہ
ٹیب پیرجہ رقبہ بول روہدہ - بالائی چاکہ کی آہو کر نقل ریل سے مہرا لہ
بغرض لڑنے سیراز 111C بجو ایا جا مانا ہے۔ اس طرح مہرا لہ نقل
بندش ملنے کی بعد لہ مکرہ جافع ملاشی بند جو لڑنے گھانڈہ کا ہیونما ہے۔

نقل عطائی اصل
107
MM-PS-NSR
07-03-021

قائم لوائل شہر

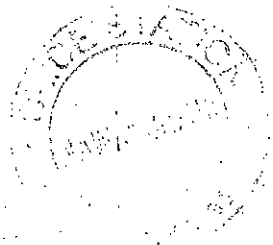
نقل ریسٹ نمبر 33 روزنامہ 07/03/021

ضلع ایبٹ آباد

عد 33 روزنامہ عدیل شاہ SHO 07/03/021 وقت 18:55 بجے اس وقت میں صہ شہزاد شاہ
نیشنل ہسپتال نشان 740، شہراز 1132، مالہ 351 سے درست با دردی با مس
پڑے گشت و دیگر کارکنوں کو روک دیا اور وہاں پہنچا۔

صفا عالی نقل و طالع اہل سے

MM-PS-NSR
07-03-021



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[Signature]

Superintendent of Police
Investigation, Abbotabad

قائم لوائل شہر

نقل ریسٹ نمبر 47 روزنامہ 08/03/021

ضلع ایبٹ آباد

عد 47 واہسی عدیل شاہ SHO 08/03/021 وقت 00:10 بجے میں صہ مہر ایان سے رقت عموالہ
33 والا بعد فراغت گشت و دیگر کارکنوں کو روک دیا اور وہاں پہنچا۔
رواں کو مہر ایان روڈ پر کالونیاٹ وغیرہ PMA روڈ مہر ایان روڈ وغیرہ میں گشت
کی گئی دوران گشت لنگر پیر روڈ سے موجود تھا کہ ایک شخص نے مشتبہ حالت میں ملا
ہوا صلو والو میں پڑے شد ہی بناء پر خاصہ تلاشی سے صہ مہر ایان میں لائی۔
10 زندہ کاروں سے پڑھا سلوار سے ایک ٹرک پھیل 30 پور پھری 29062264 صہ
پشورن سٹریٹ کوئی سٹوری سٹریٹ تیار کیا اسکرا ایجوکیشن کے قتل و وار مراد قتل قوت
اجازت نامہ پیش نہ ہو سکا اسکرا ایجوکیشن کے قتل و وار مراد قتل قوت
صہ مہر ایان سے اسکرا ایجوکیشن کے قتل و وار مراد قتل قوت
مہر ایان سے اسکرا ایجوکیشن کے قتل و وار مراد قتل قوت
مہر ایان سے اسکرا ایجوکیشن کے قتل و وار مراد قتل قوت

صفا عالی

نقل و طالع اہل سے

MM-PS-NSR
08-03-021

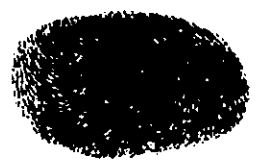


بیان ازاران قذافی 1456 / H C قید

تھانز فوٹو اسٹیٹ AMHC

بیان میں قریباً 100 سے زائد ناموں کی فہرست موجود ہے جو 03/07/021 کو میں جمع آئے تھے۔
 سے دفتر میں باخبر کارکنوں میں سے صرف وہی نام شامل کیے جہاں سے جہاں سے 540
 50 سے خود دفتر روزانہ خبریں آتی ہیں اور یہاں پر روزانہ خبریں لگتی ہیں جو کہ
 FIR دونوں گام میں 12 سے تیار دفتر میں موجود تھا اور انہوں میں
 اس میں آج تک جو FIR ہو چکی ہیں ان میں سے کچھ ہیں جو درج ذیل
 کے ہو گئے اور یہاں سے ہر روز نامہ دفتر میں موجود تھا جس کے بارے میں
 واقعات سے آگاہ کرنے کے لیے اور ہر نامہ کے متعلق بتایا گیا ہے
 جو کہ میں ایسا کوئی واقعہ پیش نہ آیا ہے ایسی بیان ہے جو کہ درج ذیل
 اور جمع تقریباً 08:00 سے دفتر میں آیا ہے اور انہوں میں FIR کے نام
 پر آگاہی کے لیے 139 نوٹس 03/07/021 کو ISAA/MPK
 دفتر میں آئے ہیں جن کے متعلق حوالہ نمبر شاہ IHC میں یہاں سے بیان ہے۔

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 04 - 05 - 021



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 Investigation, Abbottabad

سوال I - جس وقت FIR ملے گا 139/21 جی. پی. ایچ. 15AA/KPK کے تحت اور نام کیا تھا

جواب - جی. پی. ایچ. میں ملے گا اور نام کیا تھا

سوال II - اس کے پاس کس قسم کے گھر آیا تھا اور نام کیا تھا

جواب - جی. پی. ایچ. میں ملے گا اور نام کیا تھا

سوال III - کیا آپ کو SHO صاحب نے حکم دیا تھا اور نام کیا تھا

جواب - جی. پی. ایچ. میں ملے گا اور نام کیا تھا
SHO صاحب نے حکم دیا تھا اور نام کیا تھا
کے اور نام کیا تھا اور نام کیا تھا FIR دوں گا

سوال IV - کیا آپ اس سے پہلے ملزم حضرت گل محمد صاحب کے قوالے 139/21 جی. پی. ایچ. 15AA/KPK کے تحت اور نام کیا تھا

جواب - جی. پی. ایچ. میں نہیں ملے گا اور نام کیا تھا

سوال V - اور نام کیا تھا اور نام کیا تھا FIR ملے گا اور نام کیا تھا

جواب - اور نام کیا تھا اور نام کیا تھا
SHO صاحب نے حکم دیا تھا اور نام کیا تھا
FIR ملے گا اور نام کیا تھا

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1456 H.C. حیدرآباد



0333-5012176

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Superintendent of Police
Investigation, Abbottabad

بیان مذکور صادر 1267 قسط تھانہ تھانہ وفاقا بیانی ہوگا

(i) فورم 3-21 کو میں دفتر میں سے تیار ANAK کو جوڑنے کے لیے
140 کے ساتھ قلم دیا گیا روزانہ کی پینڈنگ چھوڑنے کے لیے
میں نے قلم 140 کے ساتھ روزانہ کی پینڈنگ چھوڑ دیا
(ii) تیار 140 ANAK پورے قریب 12 یا 13 کے رات فورم 3-21 کو حکم
اور تالی میں چاکر ہو گیا اور میں دفتر میں سے ہو گیا

(iii) میں دفتر میں سے تیار 140 کو قلم دیا گیا قریب صبح 5 بجے چار پانچ
بے فورم 3-21 کو تیار 140 کے ساتھ قلم دیا گیا اس وقت اس وقت
چاکر ہو گیا کہ فورم کی پینڈنگ کے ساتھ دیا گیا اس وقت اس وقت
(iv) میں نے 140 کے ساتھ قلم دیا اور فورم 3-21 کو
رات پانچ بجے کے بعد میں نے قلم دیا اور فورم 3-21 کو

قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
میں نے قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو

(v) فورم میں سے قلم دیا اور فورم 3-21 کو
3-21 کو قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو

(vi) روزانہ کی پینڈنگ کے ساتھ قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو
قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو

میں نے قلم دیا اور فورم 3-21 کو قلم دیا اور فورم 3-21 کو

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Superintendent of Police
Investigation, Abbottabad

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سوال I من وقت FIR عدل 139 اور ڈسپوٹی آپ کیاں ہے اور کیا تھا؟

جواب - عدل دفتر میں موجود تھا اور ٹائم ٹائپا بھی باغ میں تھی
2/03/08

سوال II آپ کے پاس عدل کون لے کر آیا ہے اور ٹائم کیا تھا؟

جواب - مجھے 540 عدل لے کر عدل دیا تھا اس میں FIR کی کاپی
اور ٹائم بھی ساتھ میں لایا تھا اور باغ میں تھا

سوال III کیا آپ کو 5110 عدل دیا تھا؟ روزنامہ سنڈے ٹائمز
جواب - عدل سے تیار 5110 عدل دیا تھا روزنامہ سنڈے ٹائمز

سوال IV کیا آپ اس سے قبل عدل دیا تھا؟ وقت 19:00
جواب - 540 عدل کے بعد دیا گیا اور روزنامہ سنڈے ٹائمز میں
FIR کی کاپی بھی ساتھ میں لائی تھی

سوال V کیا آپ کو عدل دیا گیا ہے یا نہیں؟ عدل 139
جواب - جی ہاں عدل دیا گیا تھا عدل 139

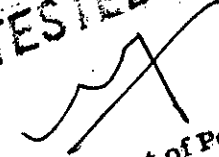
سوال VI روزنامہ سنڈے ٹائمز میں عدل دیا گیا تھا؟


جواب - روزنامہ سنڈے ٹائمز میں عدل دیا گیا تھا اور FIR کی کاپی
سے 540 عدل دیا گیا تھا اور روزنامہ سنڈے ٹائمز میں
540 عدل دیا گیا تھا

1267/1267
LHC
04/05/07
0324-7788548
0310-6544466

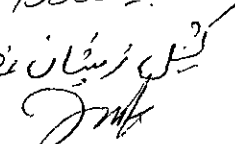
ATTESTED
Superintendent of Police
Investigation, Abbottabad

بیان لڈال کینسل ڈسٹریکٹ 740 صفحہ نمبر 740
 کینسل ڈسٹریکٹ 740 سب سے اعلیٰ درجے کے بیان پر روز وقوع میں
 شہادت 940 ماہ 351 شہادت 1132 کے صفحہ پر اور عدالت زیر مرقوم
 S40 صاحب نمبر لڈال کینسل ڈسٹریکٹ 740 صفحہ نمبر 740
 سے روانہ ہوں اسی اثناء میں گزری جینڈ جوک کے پاس موجود ہے
 یہی ڈال موہن بن بر بھائی کی ماں کے والد صاحب کی طبیعت خراب ہے
 اور گھبراہٹ میں ہے۔ 2 صفحہ 740 کینسل ڈسٹریکٹ 740 صفحہ نمبر 740
 S40 صاحب کو صورت حال کے بارے میں بتلایا اور اجازت سے
 کینسل ڈسٹریکٹ 740 صفحہ نمبر 740 سے روانہ ہو گیا۔

ATTESTED

 Superintendent of Police
 Investigation, Abbottabad


 کینسل ڈسٹریکٹ 740 صفحہ نمبر 740
 نمبر لڈال کینسل ڈسٹریکٹ 740

- XXV نمبر۔ بد روز وقوع وقت وقوع کی کیا نوٹیشن تھی؟
 جواب۔؟ بد روز وقوع S40 صاحب کے ہمراہ گفت پر تھا اسی اثناء گھبراہٹ والے ہائی بیماری
 کی اطلاع پر اطلاع خون چھاتی نے وہی جو صفحہ نمبر 740 حسب اجازت یا کینسل ڈسٹریکٹ 740
- XXVI نمبر۔ کیا آپ کو وہ فرد میں؟
 جواب۔؟ جی نہیں
- XXVII نمبر۔ کیا آپ کے فرد کے اوپر رہتی تھی جو وہ میں؟
 جواب۔؟ نہیں میں کو وہ فرد میں اور نہ ہی میں رہتی تھی وہ میں
- XXVIII نمبر۔ وقوع کی نسبت آپ کو علم ہے؟ حضرت عمل کے خلاف حکم دیا ہے سو آپ میں؟
 جواب۔؟ نہیں میں موجود تھا اور نہ ہی میں علم میں ہے
- XXIX نمبر۔ کیا وقوع کی نسبت S40 صاحب یا خورشید نے کوئی نامی کی نسبت آپ کو کوئی اطلاع دی؟
 جواب۔؟ جی نہیں

2346-9535548
 کینسل ڈسٹریکٹ 740 صفحہ نمبر 740


جان اذکار کنستبل سٹیزرز 1132 صفحہ نمبر نوائے ستمبر سال چولی 1947ء
 کنستبل سٹیزرز 1134 سید احمد انصاری - جان ہے در روز وقوع میں
 سٹیزرز 444 - قاضی 351، ڈیٹیشن 740 کے دفتر پر 23
 سٹیزرز 510 میں صفحہ نوائے ستمبر کے دفتر پر 23
 صفحہ نمبر سے روانہ ہوئی تو میں دو سال تک ڈیوٹی کی اور پھر صحت سب 510
 صفحہ سے اعزاز سے کر گئی تھی چونکہ سے گھر خود رہا نہ پائی میں
 صدر ایسی جان ہے جو کہ درود سے

ATTESTED
 Superintendent of Police
 Investigation, Abbottabad

کنستبل سٹیزرز 1132 صفحہ چولی
 صفحہ نمبر نوائے ستمبر سال

28/04/47

- XXXI پتہ درود وقوع گرفت و قتل کی آئی کی اور پتہ میں کیا گیا ؟
 جواب - درود وقوع 28/04/47 کے پتہ پر گشت پر تھا گویا صفحہ چوک نوائے ستمبر کے قتل پر
 510 میں سے اعزاز سے کیا گیا خود درود وقوع
- XXXII کیا پتہ درود کا گواہ نہیں ؟
 جواب - جی ہاں میں گواہ درود قتل مقدم میں درود قتل میں نہیں تھے اور پتہ درود
 تھا اور نہ ہی میں سے رشتہ درود پر خود میں
- XXXIII کیا پتہ کے درود پر دستخط موجود ہیں ؟
 جواب - جی میں سے رشتہ درود پر نہیں ہیں
- XXXIV کیا وقوع میں صفحہ کی کوئی شے یا چیز کے خلاف سے درود پر سے ہوا ہے ؟
 جواب - جی میں سے علم میں نہیں ہے
- XXXV کیا وقوع میں صفحہ 510 یا پتہ درود کے صفحہ نے آئی کی اطلاع دیا ہے ؟
 جواب - جی نہیں

0344.1908547

کنستبل سٹیزرز 1132 صفحہ چولی صفحہ نمبر نوائے ستمبر سال

سٹیبل ندریہ نمبر 183 سینٹر کنٹرول روم پولیس اسٹیشن آبٹ آباد
 نے بدوران دریافت بیان کیا ہے جس مورخہ 7/3/21 کو
 کنٹرول روم میں خانہ جات سے مفرقات رزح مشرف کی لفٹ
 لگے رہا تھا۔ لاک فریب 11:30 بجے نیاز انڈسٹریل حرر فون
 نے مفرقات گلیت 135 تا 138 کی لفٹ لگوائی۔ صبح قریب
 07:30 بجے مورخہ 8/3/21 کو ندرم سرد حرر نے فون کر کے مفرم
 گلیت 139 - مورخہ 8/3/21 جرم 15AA کی لفٹ لگوائی ہے
 میرا یہ بیان ہے جو درست ہے

سٹیبل ندریہ نمبر 183 سینٹر کنٹرول روم پولیس اسٹیشن

ATTESTED
 Superintendent of Police
 Investigation, Abbottabad

74
 04-05-21

0346.95.61350

سوال 1) وقوعہ کے روز آپ کنٹرول روم پر ٹھہری ہوئی ہو جو وقت
 جواب ڈیوٹی پر موجود تھا۔

سوال 2) مفرم گلیت 139 جرم 15AA کی لفٹ لگوائی ہے
 جواب صبح تقریباً 07:30 بجے ندرم سرد حرر نے لگوائی

74
 ندریہ نمبر
 04-05-21

(complainant in the instant case) and other police officials involved in the matter. During the inquiry, the accused SHO and other officials were found guilty of the charges leveled against them and they were dismissed from service vide order dated 10.06.2021. Upon directions of this court, the fact finding as well as final inquiry reports are produced before the court today and are placed on file. Perusal of the same revealed that the officials of the concerned police station in their statements before inquiry admitted that the FIR was registered at about 04:30 AM or 05:00 AM in the morning time on 08.03.2021 and in this respect one day prior i.e. on 07.03.2021, the SHO called the Muharrir to keep pending the Roznamcha of 07.03.2021 as he has to register an FIR and on the order of the SHO the Muharrir kept the Roznamcha of 07.03.2021, pending till 08.03.2021 (morning) while in the FIR the time of lodging the FIR was mentioned as 20:40 hours (08:40 PM). Meaning thereby the FIR was registered in back date. Similarly, one constable Sheraz No. 1132 also admitted before the inquiry that his name was included in the Fard as witness, but neither he was present on the spot nor he has signed on the Fard. Since, in the department inquiry it is proved that the FIR was fake, bogus and preplanned therefore, this cancellation report was filed. As the prosecution does not want to proceed with the instant FIR and has requested for its cancellation, therefore, in view of the above while agreeing with the prosecution this case in hand stands cancelled. File be consigned to record room after its necessary completion and compilation.

73
8817

Sejid Amin
JM-I/Magistrate Sec.30
Alibottabad

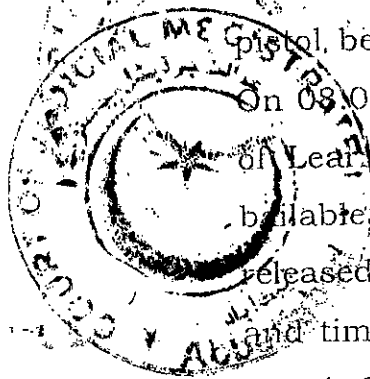
Learned counsel for the accused present. Learned SPP Miss. Tasleem Shahid Advocate also present.

The instant cancellation report is submitted in case FIR # 139, dated 07.03.2021, u/s 15AA KPK, PS Nawansher, Abbottabad. The local police have sought for cancellation of the FIR on the ground that the FIR is fake, fictitious and was preplanned to benefit the accused namely Hazrat Gul S/o Bahadar Gul R/o Bannu in a murder case registered against him on the same day at District Bannu vide FIR # 178, dated 07.03.2021, u/s 302/324/34 PPC PS Cantt, District Bannu.

During course of proceedings, the accused appeared before the court and contested the instant cancellation report by supporting the FIR to be true and correct.

Arguments heard and record perused.

Perusal of record reveals that the through FIR # 139, the accused namely Hazrat Gul was charged for commission of offence u/s 15AA KPK. As per the story narrated in the FIR, while on gusht, the SHO PS Nawansher, on suspicion searched accused and 30 bore pistol, bearing # 2906264 was found in his possession. On 08.03.2021, accused was produced before the court of Learned JM-III, Abbottabad/MOD, the offence was bailable; therefore, the accused was ordered to be released on bail. Later on, it surfaced that, on same day and time accused was also charged in case FIR # 178, dated 07.03.2021, u/s 302/324/34 PPC, PS Cantt, District Bannu and the present FIR was preplanned so as to favour the accused in FIR No. 178. Accordingly, departmental inquiry was initiated against the SHO namely Faisal Shah of PS Nawansher, Abbottabad



59/ISA

17-011-21

24-02-22

1338
1078

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Handwritten notes at the top of the page, including 'JM I' and a circled '21'.

6

ORDER
24.02.2022

JM III

Learned counsel for the accused present. Learned SPP Miss. Tasleem Shahid Advocate also present.

The instant cancellation report is submitted in case FIR # 139, dated 07.03.2021, u/s 15AA KPK, PS Nawansher, Abbottabad. The local police have sought for cancellation of the FIR on the ground that the FIR is fake, fictitious and was preplanned to benefit the accused namely Hazrat Gul S/o Bahadar Gul R/o Bannu in a murder case registered against him on the same day at District Bannu vide FIR # 178, dated 07.03.2021, u/s 302/324/34 PPC PS Cantt, District Bannu.

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Arguments heard and record perused.

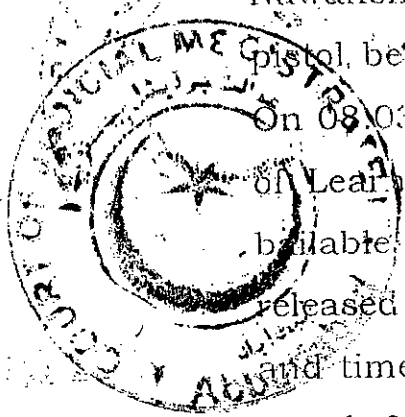
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59/15A

17-011-21

24-02-22

1338
1078



Handwritten signature or initials.

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7B



Spld Amin
 JM-I/Magistrate Sec.30
 Abbottabad

17/05/22
17-05-22

139

فارم نمبر ۳۵-۵۷ (۲)

ضلع اورنگ آباد

اختتامی رپورٹ

حصہ اول ۲ حصہ

زیر دفعہ 173 ضابطہ فوجداری

بذاتی اطلاعی رپورٹ نمبر

139

مورخہ ۰۳-۰۳-۵۷

جرم ISAA & PIA

تھانہ نوران پور

۱	۲	۳	۴	۵	۶	۷	۸
نام پتہ مشخصیت اطلاع دہندہ	نوعیت الزام یا استغاثہ	تفصیل مال سرودہ آگر کوئی ہو	نام پتہ ملزمان آگر کوئی ہو	آگر گرفتاری کیلئے تو تاریخ وقت گرفتاری	تاریخ وقت رہائی ملزم ان اور آیا ضمانت یا محکمہ پر بھیجا گیا، یا نہ۔	مال، ہتھیار بازیافتہ نیز کس نے کب اور کہاں سے برآمد کیا۔ اور مجسٹریٹ	مختصر کیفیت اطلاع یا استغاثہ کارروائی پولیس مع نتیجہ اور مزید تحقیقات نہ کرتے کے وجوہات
شاہ جہاں گانہ	7.3.52 23.139 ISAA & PIA		شاہ جہاں گانہ شاہ جہاں گانہ	7.3.52		2962264	مختصر کیفیت اطلاع یا استغاثہ کارروائی پولیس مع نتیجہ اور مزید تحقیقات نہ کرتے کے وجوہات

ضابطہ 173
مختصر کیفیت اطلاع یا استغاثہ کارروائی
پولیس مع نتیجہ اور مزید تحقیقات
نہ کرتے کے وجوہات

05/06/21

Handwritten notes on the left margin, possibly including a date and some illegible text.

Main body of handwritten Urdu text, appearing to be a letter or report. It contains several lines of text, some of which are crossed out with a diagonal line.

Signature and typed name: S. N. Sheer, 14.06.21

Handwritten notes: Sid, Forwarded to appropriate order pl. DPP Ad 28.07.21

حالت تکمیلی

۱۰/۱۱/۱۳۸۷

کاربر ۱۹/۱۱/۱۳۸۷

فصل اسپا ایل
فصل اسپا ایل
فصل اسپا ایل

کتابخانه ملی ۱۳۹ - ۱۳۹۹ - ۷۱ - ۲۰۲۱ - ۱۳۸۷ - ۱۱ - ۱۰ - ۱۹/۱۱/۱۳۸۷
کتابخانه ملی

شماره ثبت	نام کتاب و جزئیات	نوع کتاب	محل	محل	
				حفاظت	زیر نظر
۲۱۱۳۲	فصل دوم	کتاب	کتابخانه		
۰۳۱۲-۵۸۶۵۵۴۹	جامعہ اسلامیہ کتب خانہ دارالاسلام ۱۱/۳۲ ۱۱/۳۲ ۲۹/۶۶۲۲۰۴ ۲۵/۱۱/۱۳۸۷	کتاب	کتابخانه		
	فصل اول	کتاب	کتابخانه		
	فصل دوم	کتاب	کتابخانه		
	فصل سوم	کتاب	کتابخانه		
	فصل چهارم	کتاب	کتابخانه		
	فصل پنجم	کتاب	کتابخانه		
	فصل ششم	کتاب	کتابخانه		
	فصل هفتم	کتاب	کتابخانه		
	فصل هشتم	کتاب	کتابخانه		
	فصل نهم	کتاب	کتابخانه		
	فصل دهم	کتاب	کتابخانه		
	فصل یازدهم	کتاب	کتابخانه		
	فصل بیستم	کتاب	کتابخانه		

فصل اسپا ایل


کتابخانه ملی

(16)
Order

08.03.2021

Accused person namely Hazrat Gul s/o Bahadur Gul
produced in custody alongwith application for seeking his 14
days Judicial remand.

Record perused which reveals that the offence for
which the accused person is charged under section 15AA
KPK is bailable, hence, accused is hereby released on bail
subject to furnishing bail bonds worth Rs. 50,000/- alongwith
two reliable sureties to the satisfaction of this court. In default,
he kept into Judicial lockup and be produce before
Court/MOD on 22.03.2021.


Farman Ali Khan
Judicial Magistrate-III
Abbottabad
(Farman Ali Khan)
Judicial Magistrate-III
Abbottabad