Form- A

FORM OF ORDER SHEET

| Court of | |
|----------|-------------------|
| Case No | 1428/ 2022 |

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | .3 |
| 1- | 05/10/2022 | The appeal of Mr. Muhammad Usman resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on Notices be issued to appellant and his counsel for the date fixed. |
| | | By the order of Chairman |
| - | | REGISTRAR |
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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 1428/2022

Muhammad Usman

versus

DPO & Others

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Through

Appellant

Saadullah Khan Marwat

Advocate

21-A, Nasir Mansion, Shoba Bazaar, Peshawar

Ph: 0311-9266609

Dated: 19-09-2022

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 1428 /2022

Khyber Pakhtukhwa Service Tribungi

Muhammad Usman S/O Umar Khan,

R/o Sarga Khero Khel, Lakki Marwat,

EX-Constable No. 238 / LH,

Police Post City, Police Station City,

Versus

District Police Officer,
 Lakki Marwat.

2. Regional Police Officer,

⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST OB NO. 208, DATED 16-05-2022 OF R.
NO. 01, WHEREBY APPELLANT WAS DISMISSED
FROM SERVICE AND REPRESENTATION OF
APPELLANT WAS NOT HONORED TILL DATE:

Fledto-day

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Registrary,
Respectfully Sheweth;

- That appellant was appointed as Constable in the year 2009 and served the department to the best of his ability and to the entire satisfaction of the superiors.
- That on 03-10-2021, FIR No. 1327, Police Station Lakki Marwat u/s 302/34 PPC was registered against PASI, Naveed Nawaz for murder of Aleemn Shah. (Copy as annex "A")
- 3. That on 05-10-2021, appellant was served with Charge Sheet on the allegation that:-

i. He is facilitating PO / accused Naveed Nawaz.

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- ii. That all such speaks of gross misconduct on his part and is liable to punishment under Police Rules. (Copy as annex "B")
- 4. That the said Charge Sheet was replied on 11-10-2021 and appellant denied the allegations in the stated reply, stating therein that he never facilitated the said accused in the offence. (Copy as annex "C")
- 5. That enquiry into the matter was initiated against appellant but the same was not conducted as per the mandate of law because no statement of any witness(s) was recorded in presence of appellant nor he was afforded opportunity of cross examination what to speak of self defense. No punishment for imposition upon him was suggested what to speak of major punishment of dismissal from service. (Copy as annex "D")
- 6. That the authority was not satisfied with the aforesaid enquiry, so on 18-10-2021, subsequent enquiry was initiated not per the mandate of law and in this enquiry too, no punishment was ever suggested for imposition of appellant. (Copy as annex "E")
- 7. That on 11-11-2021, appellant was served with Final Show Cause Notice, without supply of enquiry proceeding to appellant which was also replied on 13-11-2021 and denied the allegation. (Copy as annex "F" & "G")
- 8. That on 13-05-2022, major punishment of dismissal from service was imposed upon appellant without taking into consideration the facts and circumstances of the case by R. No. 01. (Copy as annex "H")
- 9. That on 18-05-2022, Co-Employee, Fahim Ullah having same role and conduct in the matter was exonerated from the charges, despite the fact that he was equally held responsible in the matter was given minor punishment of stoppage of increment. (Copy as annex "I")

- N.
 - 10. That on 23-05-2022, appellant submitted representation before R. No. 02 for reinstatement in service with all back benefits which met dead response till date. (Copy as annex "J")
 - 11. That on the departmental appeal, R. No. 02 passed order for reequiry in the criminal case with remarks:-

"Please re-enquire into it and find the actual role of the officers in incident vide letter dated 20-06-2022". (Copy as annex "K")

Hence this appeal, Inter Alia, on the following grounds;

GROUNDS

- a. That from the FIR dated 03-10-2022, it is very much clear that Naveed Nawaz apprehended one Almeen Shah with pistol and arrested him at the spot. One Johar Muhammad son of Dilawar Shah posing himself to be the leader of PTI of the locality, made hot words with the said PASI for arresting the said culprits.
- b. That the said deceased whirled message on Face book ID against the said PASI that he is harassing handsome people. The said PASI went to village Dalo Khel and killed the said Almeen Shah at the same time, appellant was at police post, Lakki Marwat.
- c. That appellant never facilitated the said PASI in the commission of offence and it was his own act, if any.
- d. That charges leveled against appellant has no nexus with the same as he never facilitated the said matter.
- e. That the matter was not dealt with as per the mandate of law because neither any statement of any witness(s) was recorded in presence of appellant nor he was afforded opportunity of cross-examination.
- f. That appellant was unaware as to whether the said PASI is going for checking to Hospital or for going to other purpose.

- g. That double enquiries were conducted in the matter but no punishment was ever suggested by the Inquiry Officer to impose the same upon appellant, what to speak of major punishment of dismissal from service.
- h. That the authorities never dealt with the matter as per the record and circumstances and for no obvious reason, appellant was implicated in the same.
- i. That in similar circumstances, constable Fahim Ullah was exonerated from the charges by R. No 01 at the recommendation of Political vendetta and appellant was awarded with major punishment of dismissal from service.
- j. That neither original nor appellate order was per the mandate of law, so are liable to set aside. The same are based on malafide and discrimination.

It is, therefore, most humbly prayed that on acceptance of the appeal; order dated 16-05-2022 of the R. No. 01 be set aside and appellant be reinstated in service with all consequential benefits.

Appellant

Through

Dated: 19-09-2022

Saadullah Khan Marwat

Arbab Saiful Kamal

Amjad Nawaz

Advocates



AFFIDAVIT

I, Muhammad Usman S/O Umar Khan, R/o Sarga Khero Khel, Lakki Marwat, EX-Constable No. 238 / LH, Police Post City, Police Station City, Lakki Marwat (Appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief.

DEPONENT

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

ADVOCATE

ُ ﴾ ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شده زیر دفعہ ۱۵ مجموعه ضابطه فوجداری ضلع لکم میت

تھانہ ککی نمبر 1329

تارخ وقت وتوعه 03.10.021 وقت 12.20 بحير

| |) وقت وتوعه 03.10.021 وقت 12.20 بجه |
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| تاریخ و ونت ر پورٹ | 03.10.021 وت 12.50 بجه جا کیدگی |
| | 03.10.021 وتت 13.50 بجه |
| نام سكونت اطلاع د مهنده مستغيث | حنيف شاه ولدعالمين شاه سكنه اباخيل بعمر 31/32 سال |
| مخضر كيفيت جرم (معدد فعه) حال اگر يجهليا كيا مو_ | PPC 302/34 |
| جائے وقوعه فاصله تھا ته ہے اور سمت | بيشك اذان محمرنور محمد خان واقعه دادخيل جانب غرب |
| | جنوب8/9 كلويٹرازتھانہ |
| نام سکونت ملزم | ا نویدنواز۲ عمرگل عرف مرک بسران گل نواز سکنه دلدخیل |
| کاروائی جوتفتیش کے متعلق کی گئی اگراطلاع کرنے | برسیدگی مراسله پرچه گزادش دیورٹ چاک کیا گیا |
| ميں تو قف ہوا تو وجہ بیان کرہ | |
| تھانہےروانگی کی تاریخو وقت | بمنزلها سيبثل منيجر |

ابتدائی اطلاع بنیج درج کرو۔ ایک تحری مراسلدر پورٹ منجاب نور اسلم خان ASHO بخرض قائی مقدمہ بدست كنسليل عالمكير 603موصول موكر ذيل ہے۔ رپورٹ حنيف شاہ ولد عالمينشاہ سكنہ ابا خيل المر 31/32 سال CNIC نمبر 5-112015337131 رابط نمبر 3008306607 آج مورخه 03.10.021 بونت 12.50 بي بمقام ٹی ہینتال کی مروت بموجود گی نغش والداش عالمین شاہ بھر 51/52 سال یوں رپورٹ کرتا ہے کہ امروز میں والدام ہارون ارشدولدگل با دشاہ سکنہ اباخیل جو ہرمحمہ کے جو ہرمحمہ خان کا انتظار کررہے ہے والدام عالمین شاہ علیحدہ جاریائی پر بیٹھک کے برآ مدے میں بیٹھا تھا جبکہ سائیڈیر دوسری جاریائی پر میں اور ہارون الرشید بیٹھے تھے۔ بوقت قریب 12.20 بیٹھک کے چھوٹے دروازہ سے نویدنواز جو کہ پولیس کی وردی میں ملبوس تھا جبکہ اس کا بھائی عمرتن عرف مرک پسران گلنواز سا کنان دلو خیل اندر بیٹھک آئے دونوں کے پاس کلاشکوف ہائے تھے نوبدنواز نے فورااینے کلاشکوف سے والدام پر فائرنگ شروع کی جس سے وہ لگ کر چاریائی پرگر پڑا جبکہ عمرگل نے نوبدنواز کے فائزنگ کے دوران ہم پراپنی کلاشکوف ایم کئے رکھا بعد وقوعہ ملزمان بیٹھک سے نکل گئے اور ہم بوجہ خالی ہاتھ کچھ نہ کر سکے۔اسکے فورا بعد جو ہرمحد خان ولد دلا ورخان سکنہ دلوخیل اینے گھر ہے بیٹھک کی طرف نکل آیا اور ہم نے والدام کوسنجال کرجو ہرمحد خان کے گاڑی میں ڈال کرسیدھاٹی ہیپتال کی لے آئے ۔ مگر والد ام زخمول کی تاب ندلا کرراسته میں جان بحق ہوا تھا۔ وجہ عداوت رہے کہ والدام نے اپنے فیسبک پرامرواز ووعہ سے بچھ درقبل ملزم نوبدنواز کے خلاف خوبرولڑکوں کو تنگ کرنے اور بلیک میل کرنے کا پوسٹ چلاتا ھا۔جس پر وقوعہ ہزار دنما ہوا ہے۔ وقوعہ بندامیرے علاوہ رشتہ دارم ام ہارون الرشید ولدگل بادشاہ سکنہ دیہہ آم کے پیشم خود دیکھا۔ میں والدام کے تل کرنے کا برخلاف نویدنواز اسلحهایم کرنے ،غرض مشتر کهارادہ قبل کرنے کا برخلاف ملزم عمرگل عرف میر کی کی دعویدار ہوں ۔العبدد سخط انگریزی مدعی كارروائي يوليس حسب آمده اطلاع شي مبيتال مردان آكرمدي بالاكي ريورث ضبط تحرير مين لاكرية هكر سناياسمجها يا كيار درست

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سلیم کر کے زیر بورٹ اپناد سخط شبت کیا۔ جس کی میں نقید بق کرتا ہوں۔ مقتول کا نقشہ ضرد فر دصورت حال مرتب کر کے بخر خوج بوسٹ مارٹم زیر حفاظت کنسٹیل نجیب امیر 160 حوالہ ڈاکٹر صاحب کیا جاتا ہے۔ مضمون رپورٹ سے صورت جرم 160 موالہ ڈاکٹر صاحب کیا جاتا ہے۔ مضمون رپورٹ سے صورت جرم 302/34 کی بائی جاتی ہے۔ واضح رہے کہ نوید نواز PASI نی پائی جاتی ہے۔ واضح رہے کہ نوید نواز PASI نوید کی بائی جاتا ہے۔ مراسلہ بخرض قائمی مقدمہ بدست کنسٹیل عالمگیر 603 ارسال تھان ہے۔ اللہ اللہ سے تفتیش کیجا وے۔ دستھ انگریزی نوراسلم خان ASHO تھانہ کی مورخہ 203،10.2021 کی بورٹ جاکہ ہو کرنے جاتا ہیں۔ برچہ بجرم بالا بمز لہ اپیشل رپورٹ جاکہ ہو کرنے جاتا ہیں۔ برچہ بجرم بالا بمز لہ اپیشل رپورٹ جاکہ ہو کرنے جاتا ہیں۔ برچہ بجرن لہ آپیشل رپورٹ گزارش ہے۔

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CHARGE SHEET UNDER NWFP POLICE RULES 1975.

I, Imran Khan PSP, District Police Officer, Lakki Marwat as competent authority hereby charge you LHC Muhammad Usman No.238 while posted as MHC PP City Lakki as follow:-

- 1. That you are facilitating PO/accused Naveed Nawaz.
- 2. That all speaks of gross misconduct on your part and liable to be punished under Police Rule-1975.
- 3. By reason of the above, you appear to be guilty or misconduct under section 02 (iii) of the KPK Police Rules 1975 and has rendered yourself liable to all or any of the penalties as specified in section – 04 (i) and & b of the said rules.
- 4. You are therefore directed to submit your written defense within seven days (7) of the receipt of this Charge Sheet to the Enquiry Officer.
- 5. Your written defense if any, should reach to the enquiry officer within the specified period, failing which, it shall be presumed that you have no defense to put-in and in that case, an ex-parte action shall follow against you.
 - 6. Intimate whether you desired to be heard in persons.

No. 6368 Dated Lakki Marwat the OS/10 2021.

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OFFICE OF THE DISTRICT POLICE OFFICER, LAKKI MARWAT.

No. 6368 1

Dated: 65 /10 /2021.

DISCIPLINARY ACTION UNDER KPK POLICE RULES - 1975.

I, Imran Khan PSP, District Police Officer, Lakki Marwat as competent authority am of the opinion that LHC Muhammad Usman No.238 while pested as MHC PP City Lakki has rendered himself liable to be proceeded against as he committed the following acts/commission which fall within the meaning of Section-02 (iii) of KFK Police Rules 1975.

STATEMENT OF ALLEGATIONS.

- 1. That he is facilitating PO/accused Naveed Nawaz.
- 2. That all speaks of gross misconduct on his part and liable to be punished under Police Rule-1975.

The Enquiry Officer shall conduct proceedings in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record its finding and make within twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.

The accused officer shall join the proceedings on the date, time and place fixed by the Enquiry Officer.

District Police Officer Lakki Marwat

OFFICE OF THE DISTRICT POLICE OFFICER, LAKKI MARWAT.

No. <u>6.369-70</u> /SRC, dated Lakki Marwat the <u>@\$\[/\C \]</u> /2021.

Copy of above is submitted to the:

for initiating proceedings against the accused officer under Police Rules 1975.

2. LHC Muhammad Usman No.238 with the directions to appear before the Enquiry Officer on the date time and place fixed by the enquiry officer for the purpose of enquiry proceedings.

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OFFICE OF THE DISTRICT POLICE OFFICER

No. 7497

/SRC

/2021

Dated /////

LAKKI MARWAT

FINAL SHOW CAUSE NOTICE

You LHC Muhammad Usman No.238 while posted at PP City Lakki are guilty of acts of omission and commission as detailed below:-

"You are facilitating PO/accused Naveed Nawaz. Thus this speaks deviant and gross misconduct on your part.

- In this regard, charge sheet based upon summary of allegations was issued and DSP/Hqr: Lakki Marwat was appointed as Inquiry Officer after conducting proper departmental enquiry submitted his finding report and you were found guilty of the misconduct.
- NOW THEREFORE, I, Shahzada Umar Abbas Babar PSP, District Police Officer Lakki Marwat call upon you through this Final Show Cause Notice within three (03) days of the receipt of this Final Show Notice that as to why you should not be awarded a major punishment including dismissal from Service as provided under KPK Police Rules, 1975. Also state whether you want to be heard in person.

In case your reply is not received with in stipulated period without sufficient reasons, it shall be presumed that you have no defense to offer and the undersigned would be at liberty to pass on ex-parte action against you.

(Shahzada Umar Abbas Babar) PSP District Police Officer

Makki Marwat

عُولِينَ لِي المُعَالِّلُ فِي 11-11-11-11-11-11-2021 يرود 2021-11-11-11-2021 عِنْاكُ نَ عَلَيْكُ المُعَالِّلُ £ الله المساولة المركزة المركزة المساولة المساورة المساورة المساورة المركزة قریائے۔ اور دہائی فیکا دفئن کی میٹن نی ملائی ایا ہے۔ جو ایکری سے بروی کے دیات ہود 2009-2017 کی اس میں مدادات کی اساس سے اللی انجیاب کیا ہے۔ المحافظ المحافظ کی است ماکن الک اللے اللی میٹر (کیکوئن کا بیائے کے کو کسون ملاومی جرات اللہ سے بیائی کیا ہے۔ 1002014 کا دیستان ملاومی کو میں کی جو عِينان 2017 على 10 ETC هِ إِن كَرَاكِ عَلَى الله الله عَلَى الله الله عَلَى الله الله الله الله الله الله الله كامروت فينات ويكامون وككاف بالوال وكاست التولوورول لامزاجام وي ب الناسي الموادع وكاموامهم فال يما توليو ومريك وت گزاران عدد كايك اول يان ترول موجات جنل مكوليلوار فان PAS النوازي حرك تبيات موجات مرد رواد است على است المناها ا مِدا مَعِمَ عَانِ ASIھے سلومات ماسل کے ہیں۔ ئىز(2)چىلىكا PAS كۇلۇلۇمان ئىڭدەد تاتىپىشىن داراكى، دائىن كاشوال بەرجاب دىئوكىن يولىن كىردىن ئىرىك تارىخات دىچكىيات كەددا م اً رَجِكَ كِنَاجِكِ ٤٤ 99 وَلِلَّ كَانَوَا كُل HSHOs إي الإن ASIS كَنْ كَان مِن لَدِير النِّينَ حَالِي ما وإن ك فراكر يحترين مين SHOs مناجان الخادة ASis مناجان (GOOD) كالدال كري كالحال دالي كرز والمرزود وكركوانوا بمين ديا كياروانوام BHO يا SHO ماحب کا بوتا ہے۔ (اطفیا کی وَمِرُوا مِن) کین اگرایا کا ترے ہوگا ٹوارج ویولان ان برالزام ہے۔ قریبے گناہ کولیکشنون کروائے نہائے ہیں۔ شیر(3) ایجاجہ ایک افغان وومرے افغان کے ول بالزن سے تاواقت ہوتا ہے عور کوکیا مسلوم ہوتا ہے۔ کے عرب SHO مانجاری ASI کے دل بھی کی اور جمیابول ئېر(4) جناب الله تغالى كوغاښرتا تلريخ ان كرتخ ريې طود ريكورينا ون كړين تخرنه PAS . فدياز از سے كې خير شوريز كاحصيس مون يين باالكل يركمنا و سيرتصور مون _ فير(6)() جناب عندين ملطله 1018 SCMR بي 2020 أرد زينات برزيم كوت آن ياكتان جس كي فو لوكان مراولات ب (ii) 2013 PLC (GS928) عِنْ لَوْلَوْلِ إِنْ إِنْ اللَّهِ السَّلِينَ مِنْ اللَّهُ مِنْ اللَّهِ فِي اللَّهِ اللّ جاڪال عن بالكل في كناه ولا التاسيم إقيد ول يولين محمدة فها يت ول الكتابون الشاه الله عرى ديابتداريا تل تعيم اورساف شية آلي والساروت ملازمت ل منابت بيد المندام را الزاري بالريد كاروالي فالل فرما كن جات الله الشال كالموت تبالى من كالدري الدي المات بالف كالفروش ووالاجاء لوازش اتحت موكي مورند: 2021-11-13 ناك المحيط العالمان 238/LHC أحسل متعبد وليمن المن كالروف

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OFFICE OF THE DISTRICT POLICE OFFICER LAKKI MARWAT

Ph# 0969-538240, Fax# 0969-538244

ORDER:

My this order will dispose off the departmental enquiry proceedings against LHC Muhammad Usman No. 238 while posted at PP City Lakki Marwat was found to indulge in the following omission/commission as detail below:-

- 1. "That he is facilitating PO/accused Naveed Nawaz. Thus this speaks deviant and gross misconduct on his part.
- 2. In this regard, he was charged sheeted and enquiry was marked to DSP/Hqrs: Lakki Marwat for through probe into the allegations. The enquiry officer after conducting proper departmental enquiry submitted finding report stated therein that he official concerned physically not took part in the incident, however on the event of full day he went behind the accused PASI Naveed Nawaz that he is going to Hospital for checkup of kidney. He is also hiding the facts from the Enquiry Officer, hence found guilty of the misconduct. He was served with Final Show Cause Notice to this effect. His reply to the Final Show Cause Notice was perused which was also found un-satisfactory.
- 3. Therefore, I Shehzada Umar Abbas Babar PSP, District Police Officer Lakki Marwat exercise of the power vested in me under KPK Police Rules-1975 hereby impose upon him major punishment of "Dismissal from Service" with immediate effect. He is directed to deposit all the Govt. articles allotted to him to the concerned branches.

O.B No. <u>208.</u>

Dated: <u>18-05-2022</u>.

Sd/-

(SHEHZADA UMAR ABBAS BABAR) PSP District Police Officer Lakki Marwat.

No. 7440-43/dated lakki Marwat.

Copy of the above is submitted for favour of information to:-

- 1. The Regional Police Officer, Bannu region, Bannu.
- 2. EC, PO, OHC & Lines Officer for necessary action.





ORDER

This order will dispose to full he deput mentille aquir appreceding security EHG Muhammad Usmun Sness while posted as VIHG PR Gilyalaiss (vir jound to muuleenmake tollovinetomission/commission-ascieliukeelove

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Direct: /6 905/202210

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OFFICE OF THE DISTRICT POLICE OFFICER LAKKI MARWAT

Ph# 0969-538240, Fax# 0969-538244

ORDER:

My this order will dispose off the departmental enquiry proceedings against Constable Faheem Ullah No. 215 while posted at PP City Lakki Marwat was found to indulge in the following omission/commission as detail below:-

- 1. "That he is facilitating PO/accused Naveed Nawaz. Thus this speaks deviant and gross misconduct on his part.
- 2. In this regard, he was charged sheeted and enquiry was marked to DSP/Hqrs: Lakki Marwat for through probe into the allegations. The enquiry officer after conducting proper departmental enquiry submitted finding report stated therein that he official concerned physically not took part in the incident, however on the event of full day he went behind the accused PASI Naveed Nawaz in Govt. vehicle which speaks their secret intentions towards the incident and also hide the facts from the Enquiry Officer, hence found guilty of the misconduct. He was served with Final Show Cause Notice to this effect. His reply to the Final Show Cause Notice was perused which was also found un-satisfactory.
- 3. Therefore, I Shehzada Umar Abbas Babar PSP, District Police Officer Lakki Marwat exercise of the power vested in me under KPK Police Rules-1975 hereby impose upon him minor punishment of "Stoppage of increment for two (2) years" with immediate effect.

O.B No. 209.

Dated: 18-05-2022.

Sd/-

(SHEHZADA UMAR ABBAS BABAR) PSP District Police Officer Lakki Marwat.

No. 7460-63/dated lakki Marwat.

Copy of the above is submitted for favour of information to:-

- 1. The Regional Police Officer, Bannu region, Bannu.
- 2. EC, PO, OHC & Lines Officer for necessary action.



ORDER

My this order will dispose off the departmental enquiry proceedings against Constable Faheem Ullah No.245 while posted at PP City Lakki was found to include in the following omission/commission as detail below:-

- 1. That heris facilitating PO/accused Naveed Navaz Thus this speaks deviant and gross misconduct on his part.
- In this regular we was charger sheeted and enquiry was marked to DSP/Hqrs Lakki oberintogine allegations. The enquiry officer after conducting proper departmental enquire submittelly linding report stated therein that the official concerned physically not took part in the incident, however on the event of full day he went behind the accused PASENgyced Navaz in Govi: vehicle which speaks their secret intentions towards the somude the flacts from the Enquiry Officer, hence found guilly of the misconduct Holyas served with final Show Cause Notice to this effects His reply to the Final Show Causes of the same perused which was also found un-satisfactory

Therefore Takk Vlarivanickereine obthopower vested in me under KPK Police Rules-1975; hereby impose upon hungininor punishment of "stoppugecollinerement for two (2) years" wilh uninediate effect.

OB No. 209__

fled: 18/2022.

District Police Officer Lakki Migrant

No.7 760-63/ Dated Lakki Marwaline 1/8/15/2022

Cofficientionesis submitted for favour of information to:-

- 1. The Regional Police Other Binnu Region, Bannu.
 2. F.C. 10. Off Calculates (a) precise in necessary action.

بخدمت جناب ريجنل پوليس آفيسر صاحب بنوں ريجن بنوں

عنوان: ورخواست، اپیل بابت بحالی ملازمت اور منسوخی آرڈر 43-7440 / 2022-05-18 مجاربی جناب

وسركت بوليس فيسرصاحب كليمروت

جناب عالى!

اندریں سلسلہ سائل ذیل گزارشات عرض کرنا جا ہتا ہوں۔

1_ سائل بدوران وتوعه محرر چوکی شی کلی تعینات تھا۔اورروز وقوعه اپنی ڈیوٹی پر چوکی ہزامیں موجود تھا۔

2_ نویدنواز PAS وقوعه نداست قبل انجارج چوکی بذاتعینات تھا۔

3۔ نویدنوازخان PAS۱ نے کئی شہر سے دور 4/5 کلومیٹر کے فاصلہ پر دیہہ خود دلوخیل میں وقوعہ ہذا سرز دکیا ہے من سائل کےخلاف نویدنواز PAS۱ (ملزم) کو وقوعہ میں Facilitate کرنے کا الزام لگایا جا کر چار ک شیٹ کیا گیا۔اورانکوائری آفیسر DSP/HQ لکیمر وت مقرر کیا گیا۔

4۔ من سائل نے مفصل جواب قسران بالا کوچارج شیٹ کے جواب میں دیا ہے۔

5۔ جنابDSP/HQ کیمروت نے انکوائیری کی۔کراس بیانات قلمبند کیتے اور انکوائری رپورٹ

242/20-10-21 بخدمت جناب DPO صاحب کیم وت بجھوایا۔اور من سائل کے خلاف لگائے گئے۔ الزامات سے من سائل کو بری قرار دیا۔

6۔ من سائل کو فائینل شوکا زئوٹس جاری کیا۔جسکے جواب میں من سائل مفصل گزارشات عرض کر چکا ہول۔

7۔ من سائل کوائکوائری آفیسرصاحب نے الزامات سے بری ہونے کا (جس کا جناب DPO صاحب کی مروت نے اس کا کا جناب DPO صاحب کی مروت نے اپنے آرڈر نمبر میں ذکر کیا ہے) تحریر فرمایا ہے۔ کے باوجود جناب DPO صاحب کیمر وت نے Dismissal from service آرڈر جاری فرمایا ہے۔

من سائل الزامات سے بے گناہ ہے۔ اور نوید نواز PAS انجاری چوکی شی لکی کو وقوعہ ہذا کے بارے کسی من سائل الزامات سے بے گناہ ہے۔ انکوائری آفیسر صاحب DSP/HQ صاحب کلیمر وت اور جناب DPO صاحب لکیمر وت اور جناب DPO صاحب لکی مروت کے آرڈ رسے صاف واضح اور روز روش کے طرح عیاں ہیں۔

لہذا مؤ دبانہ گزارش ہے کہ سائل مشفقانہ کر بیانہ نظر فر ماکر سائل سروس پر بحالی اور جناب DPO صاحب کی مسائل مشفقانہ کر بیانہ نظر فر ماکر سائل سروس پر بحالی اور جناب DPO صاحب کی مسوخی کے احکامات صادر فر ماویں۔ کیکمروت کے آرڈر Dismissal from service کے منسوخی کے احکامات صادر فر ماویں۔ میں نوازش ہوگی

مورى: 23/05/2022

العارض

lus

سابق محرر محد عثان 238/LHC چوکی شی لکی ضلع لکی مروت

Waster Walter

From:

The Regional-Police Officer Bannu Region, Bannu

The Addi S P Bannu

PANdated Bannuthe 20160 N2022

ORDERUX ROOM FREINOURWING ASEMIRING 1829/2021 DATIED Subjec

03110-2021107S/302/34TEP.CIP.STEATOKT

Memo

On 16 June 2027 during Order WRoom une police forments wird in the bed nwarded Durished by DRO Bakking penied before the Regional Police Chief Brinning liver appeals and indings of enquity conducted by DSP/HQ3Lakki vere penised and recorded in following remark

Addl: SP/Bannu

Plzye-engureunousands multiene un antique of the seconicers in inchem

- Muhammad Usman LHIC No 2
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Encl Asiabove ((1554e269)

Regional Police Offi

المراسم المراس بمقدم مندم ويعنوان بالامير ابنى المرضيسي واسط يروي وجواب دميي وكل كارواكي متعلف كارهام لبثاور كيسك المركة والما عان و وقيف المركيط الي كورك كورك وركي منزرك والزارك والمركة المركة تموض كومقديم كم كارواكى كاكرل إخ يارس كالنبر وكرل صاحب كرمرنه داعى اروا فرزال والبداريات مين توابد اي اورا قبال دموني اوربعمور والريم كرني الري اوروسولي جيك وروبيه اوربرض دعوى اور رواريت مرتم ك تقلدين ا زران مير تولو كرايد كما اختيار توكا خبز بعور عدم بيردي يا ظري بكيطرفه يا ايل كرايدي إمريتسين لمبروان مرين ابزل كمران ولنلزان وبريري مريني آخايار بوشخا اوربقريت فرورت مقدم مريد كُونَ الْبَرُون كاروالي سنة واستطر إوروميل النارقانون كوسية بمراه يا ابني بجائد تمروكا المنايار برسا ا برمان به مقرم شناط کودی و سی جمله مذکوره بالا اختراطات مامیل بول کید ارزاس کا ساخته برداشت مناوز مبرل میرسماه به وران مبقدمه به جو مفرح په و مرحانه الهوا, مهدير که مساب سه میرکه اس که مستمن و ^{در}ل ۱۵ در ب مرت بدن و بدرری مسر به ایا دفرت کی وصولی مرفی کا بهی اختیار بیشا اگر کولی تاریخ بیشی دنیام درره يريمو أ مدس الريمو الووكل صاحب إبرار في يك كربيروى مذكور كريي. لہٰذا وکالمت نامہ دکھ دیا کہ سندسے۔ الزنفي مرح - 9-19 مجدلواز