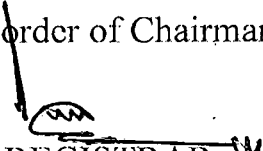


Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 1522/2022


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 24/10/2022                | <p>The appeal of Mr. Nouman Haider resubmitted today by Mr.Irfan Ali Yousafzai 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.</p> <p>By the order of Chairman</p> <p><br/>REGISTRAR</p> |

The appeal of Mr. Nouman Haider son of Rafi Ud Din r/o Mohallah Bahadar Ghari Hangu Ex-Constable received today i.e. on 18.10.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of **dismissal order** mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal preferred by the appellant to respondent no.2 RPO as mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of order dated 19.07.2022 of the appeal is illegible which may be replaced by legible/better one.

No. 2854 /S.T,

Dt. 19/10 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

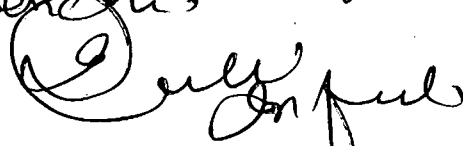
Mr. Irfan Ali Yousafzai Adv. Pesh.

① ~~Para~~ objection No-1 is attached on  
Page No-15- Annexure-12

② objection No-2 is attached at Page-16  
Annexure-12.


③ objection No-3 better copy is attached

Please place before me  
in Benches,



21-10-2022

that we have filed this appeal  
before I.A.P. and he refused  
the said order RPO. and in  
impugned order.

  
21-10-2022

**BEFORE THE COURT OF WORTHY CHAIRMAN**  
**SERVICES TRIBUNAL, PESHAWAR**

Appeal No. 1522/2022


Nouman Haider.....**Appellant**

**V E R S U S**

IGP and others.....**Respondents**

**I N D E X**

| <b>S.No.</b> | <b>Description of Documents</b>   | <b>Annex</b> | <b>Pages</b> |
|--------------|---|--------------|--------------|
| 1.           | Memo of appeal along with affidavit   | *            | 1-8          |
| 2.           | Application for condonation of delay along with affidavit                       | *            | 9-10         |
| 3.           | Copy of service car   | A            | 11           |
| 4.           | Copy of the show cause notice   | B            | 12           |
| 5.           | Copies of charge sheet, Disciplinary Action and impugned order dated 19/07/2022 | C & D        | 13-15        |
| 6.           | Copies of departmental appeal and order dated 14/09/2022                        | E & F        | 16-19        |
| 7.           | Any other documents   | *            | 20-22        |
| 8.           | Wakalatnama   | *            | 23           |



Appellant

Through



**Irfan Ali Yousafzai**

Advocate, High Court,  
Peshawar

Cell# 0314-9070658

Date: 18/10/2022

**BEFORE THE COURT OF WORTHY CHAIRMAN**  
**SERVICES TRIBUNAL, PESHAWAR**

Appeal No. 1522/2022

Nouman Haider S/o Rafi Ud Din R/o Mohallah Bahadar  
Ghari, Hangu (Ex-Constable, Belt No.420)

.....**Appellant**

**V E R S U S**

1. Inspector General of Police, Khyber Pakhtunkhwa,  
Central Police Office, Peshawar.
2. Regional Police Officer, Kohat Region, Kohat.
3. District Police Officer, District Hangu.

.....**Respondents**

**APPEAL UNDER SECTION 4 OF KP**  
**SERVICES TRIBUNAL ACT 1974**  
**AGAINST THE IMPUGNED ORDER**  
**DATED 14/09/2022 WHEREBY THE**  
**RESPONDENT NO.2 DISMISSED THE**  
**DEPARTMENTAL APPEAL OF THE**  
**APPELLANT FILED AGAINST THE**  
**IMPUGNED ORDER DATED**  
**19/07/2022 PASSED BY THE**  
**RESPONDENT NO.3 WHEREIN THE**  
**APPELLANT WAS REMOVED FROM**  
**HIS SERVICE**

**Prayer in Appeal:**

On acceptance of this service appeal, both the impugned orders dated 14/09/2022 and 19/07/2022 passed by the respondents No.2 and 3 may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits.

**Respectfully Sheweth:**

1. That the appellant was appointed as Sepoy in District Police Hangu in year 2019. **(Copy of service car is attached as Annexure-A)**
2. That one Zaryab S/o Haroon Rashid R/o Mohallah Al-Sheravi of Hangu having Mobile No. 0347-9452707 appeared before the respondent No.3 and made a complaint against the appellant regarding black-mailing on social media through is Whatsapp No. 0336-9583028 and leveled the allegations of indisciplined manner and criminal gross misconduct.
3. That on the above mentioned reason, the respondent No.3 issued show cause notice to the appellant which duly replied by the appellant.

**(Copy of the show cause notice is attached as Annexure-B)**

4. That upon the allegations, the inquiry was conducted against the appellant in the supervision of SP Investigation Hangu. On the completion of requisite inquiry, the inquiry officer submitted his findings report to the respondent No. 3 and the respondent No.3 dismissed the appeal vide impugned order dated 19/07/2022. **(Copies of charge sheet, Disciplinary Action and impugned order dated 19/07/2022 is attached as Annexure-C & D respectively)**
  
5. That the appellant being aggrieved from the above mentioned ~~removal~~ order dated 19/07/2022, filed departmental appeal to the respondent No.2 which was also turned down vide impugned order dated 14/09/2022. **(Copies of departmental appeal and order dated 14/09/2022 are attached as Annexure-E & F respectively)**
  
6. That feeling aggrieved from the above mentioned orders dated 14/09/2022 and 19/07/2022 of the respondents, the appellant approaches this

(4)

Hon'ble Tribunal inter alia on the following grounds:

**GROUND S:**

- A. That the impugned order of the ~~removal~~ from service of the appellant is not in accordance with law, facts, evidence on record, rules and principles of justice, hence liable to be set aside.
- B. That it is a well established principle of law and justice, that whenever a charge is to be framed against an accused or defaulter, it shall be specific so that to enable the defaulter to prepare his defence properly. However, in the case of the appellant it will indicate that the charge is vague and ambiguous because the worthy competent authority has not mentioned that from which date to which date the appellant allegedly remained absent. Hence the basic and fundamental right of preparing defence by the appellant was infringed and in this scenario the impugned order has become legally defective and no punishment can be awarded on such a vague and ambiguous charge against the appellant.
- C. That the alleged enquiry against the appellant was conducted unilaterally, one sidedly and at

5

the back of the appellant which in the eyes of law has got no legal value and hence the impugned enquiry and the impugned orders are not sustainable in the eyes of law. Thus no punishment can be awarded on such a one sided enquiry.

D. That under Art. 10-A of the constitution of Pakistan, transparent, impartial and independent enquiry/ trial against accused/ defaulter has been declared as his fundamental and inalienable right but here, in the instant enquiry fundamental right of the appellant has not been adhered. Thus enquiry and the impugned orders are violation of the fundamental right of the appellant. Hence, the impugned orders are not operative on the rights of the appellant.

E. That the impugner orders have though mentioned framing charge sheet and the statement of allegation against the appellant but has forgotten to mention about his service on the appellant. If charge sheet and statement of allegations were framed against the appellant, then they should have been served upon the appellant. However, nothing has been said about their service upon the appellant in the impugned order. Under the law/rules service of the charge



sheet and statement of allegations upon the defaulter are mandatory. Without their service upon a defaulter, enquiry cannot proceed against him. If a defaulter is not physically present before the authority then, it is required that they should be sent at the home address of the defaulter but it appears that the established/prescribed procedure was not followed. It appears that the worthy competent authority was bent upon to punish the appellant at any cost, hence, the prescribed procedure and as well as legal/codal formalities were not followed in letter and spirit which has rendered the impugned orders as legally defective orders which has got no impact on the service rights of the appellant and thus he is presumed to be on duty since his Removal from service.

- F. That in case if appellant was not traceable then ex-parte proceedings were to be initiated against the delinquent official but in the impugned order it does not appear that ex-parte proceedings against the appellant were directed at any stage of the enquiry. Hence the enquiry and the impugned orders suffer from material legal irregularity.
- G. That under the law maximum punishment like Removal from service is to be awarded after

following al legal and codal formalities in letter and spirit. Moreover, respondents will not treat the matter as an ordinary one and while awarding such a maximum / harsh punishment he should give serious and repeated considerations but from the impugned orders, it appears that legal and codal formalities were not followed in letter and spirit and no serious consideration was paid while depriving the appellant from his only source of income.

- H. That the appellant is a law abiding person and he has always kept his departmental interests above his personal interests. Appellant being member of the law enforcing agency cannot imagine to remain absent without leave or permission.
- I. That any other grounds will be raised at the time of arguments with prior permission of this Hon'ble Tribunal.


**It is, therefore, most humbly prayed that on acceptance of this service appeal, both the impugned orders dated 14/09/2022 and 19/07/2022 passed by the respondents No.2 and 3 may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits.**

OR

Any other relief may deemed fit in the circumstances of the law may also be granted in favour of the appellant against respondent.

  
Appellant

Through

  
**Irfan Ali Yousafzai**  
Advocate, High Court,  
Peshawar

Date: 18/10/2022

**BEFORE THE COURT OF WORTHY CHAIRMAN**  
**SERVICES TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_\_/2022

Nouman Haider.....**Appellant**

**V E R S U S**

IGP and others.....**Respondents**

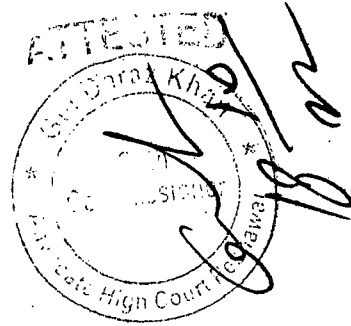
**AFFIDAVIT**

I, **Nouman Haider S/o Rafi Ud Din R/o Mohallah Bahadar Ghari, Hangu (Ex-Constable, Belt No.420)**, do hereby solemnly affirm and declare on oath that the contents of accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Identified by:

*[Signature]*  
**DEPONENT**

*[Signature]*  
**Irfan Ali Yousafzai**  
Advocate, High Court,  
Peshawar.



**BEFORE THE COURT OF WORTHY CHAIRMAN**  
**SERVICES TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_\_/2022

Nouman Haider.....**Appellant**

**V E R S U S**

IGP and others.....**Respondents**

**APPLICATION FOR CONDONATION OF DELAY**

**Respectfully Sheweth:**

1. That the above Service Appeal has been filed by the petitioner and no date of hearing has yet been fixed.
2. That due to no knowledge of impugned order nor the impugned order has been sent to the petitioner nor served on the petitioner and was kept secret after completion of statutory period of appeal.
3. That delay in filing the titled service appeal is neither willful nor deliberate but due to reason mentioned above.

**It is, therefore, most humbly prayed that on acceptance of this application, the delay, if**

any, in filing the above titled service appeal may kindly be condoned in the interest of justice.

*[Signature]*  
Appellant

Through

*[Signature]*  
**Irfan Ali Yousafzai**  
Advocate, High Court,  
Peshawar

Date: 18/10/2022

**AFFIDAVIT**

I, **Nouman Haider S/o Rafi Ud Din R/o Mohallah Bahadar Ghari, Hangu (Ex-Constable, Belt No.420)**, do hereby solemnly affirm and declare on oath that the contents of accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

*[Signature]*  
**DEPONENT**

*[Signature]*

Annex (A)

(11)




47 71

**POLICE ID CARD**

**POLICE**

Khyber Pukhtoon Khwa

S.NO: 932848

**Noman Haider**  
Constable 420

DISTRICT POLICE OFFICER,  
HANGU

**POLICE**

**F/Name:** Rafi U Din

**Mobil:** 0336-9583028

**NIC No:** 14101-4285424-5

**D.O.Appo:** 31-12-2019

**D.O Birth:** 1-12-1998

**Blood Grp:** +ve

**Height:** 5'8

**Eyes:** Brown



**Address:** Matak Abad Hangu

**Distt:** Hangu

**D.O.Issue:** 31-12-2019

**D.O.Expy:** 30-12-2024

**Emergency:** 0925-624004

April "B"

OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel: 0925-623878 Fax 0925-620115

No. 119 EC dated Hangu the 06/07/2022

**FINAL SHOW CAUSE NOTICE**

**Asif Bahader, (PSP), District Police Officer, Hangu as Competent authority** under the **Khyber Pakhtunkhwa Police Rules 1975 amended 2014** hereby serves you **Constable Noman Haider No. 420** while posted at **Dallan Pul Check Post** as follows:

That consequent upon the completion of inquiry conducted against you by the inquiry officer Mr. Arshad Mehmood SP, Investigation Hangu in which you have given full opportunity of hearing but you failed to submit any reasonable response in your self defence and recommended you for removal from service under Police Rules 12-21 vide his office Memo No. 1006/Inv; dated 17/06/2022.

From going through the finding and recommendations of the inquiry officer, the material on record and other documentary proof including your defense before the inquiry officer

I am satisfied that you have committed the following **acts/omissions**, specified in section 3 of the said ordinance.

- i. One complainant Zayab s/o Haroon Rashid r/o Moh: Al-Sheravi, District Hangu bearing Mobile No. 0347-9452707 was appeared before the undersigned and complained against you, Constable Noman Haider No. 420 regarding his blackmailing on social media through your WhatsApp No. 0336-9583028 by submitting the photocopy of massages (copy annexed).
- ii. Besides you being a member of disciplined force, a habitual absentee, narcotics addicted and found involved in attempt of child kidnapping vide DD No. 32, dated 01.04.2021 P.S City, Hangu as such acted in disciplined manner and criminal gross misconduct on your part, which cannot be ignored.

As a result thereof, I, as competent authority, have tentatively **decided to impose** upon you major penalty provided under the Rules *ibid*.

You are, therefore, required to show cause as to why the aforesaid **penalty** should not be imposed upon you also intimate whether you desire to be **heard in person**.

If no reply to this notice is received within 07 days of its delivery in the **normal** course of circumstances, it shall be presumed that you have no **defence to put in** and in that case as ex-parte action shall be taken against you.

The copy of the finding of inquiry officer is enclosed.

**ATTESTED**  
*[Signature]*  
to be true copy  
Advocate

*[Signature]*  
**DISTRICT POLICE OFFICER,  
HANGU**



Annex = "C"

(13) (108)



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel No. 0925-623878 & Fax No. 0925-626139  
Email: dpohangu8@gmail.com

**CHARGE SHEET**

1. MR. ASIF BAHADER, PSP, DISTRICT POLICE OFFICER, HANGU, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you, Constable Noman Haider No. 420 while posted at Dalian Pul Check Post rendered yourself liable to be proceeded against, as you have omitted the following act/omissions within the meaning of Rule 3 of the Police Rules 1975:-

- i. One complainant Zayab s/o Haroon Rashid r/o Moh: Al-Sheravi, District Hangu bearing Mobile No. 0347-9452707 has appeared before the undersigned and complained against you, Constable Noman Haider No. 420 regarding his blackmailing on social media through your Whatsapp No. 0336-9583028 by submitting the photocopy of massages (copy annexed).
- ii. You being a member of disciplined force had acted in an undisciplined manner and criminal gross misconduct on your part, which cannot be ignored.

2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.

3. You are, therefore, required to submit your written statement within 07 days of the receipt of this Charge Sheet to the enquiry officer.

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

A statement of allegation is enclosed.

**ATTESTED**  
*[Signature]*  
to be true copy  
Advocate

**DISTRICT POLICE OFFICER,  
HANGU**



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel No. 0925-623878 & Fax No. 0925-620135  
Email: dpohangu8@gmail.com

**DISCIPLINARY ACTION**

I, **MR. ASIF BAHADER, PSP, DISTRICT POLICE OFFICER, HANGU,** as competent authority, am of the opinion that you, **Constable Noman Haider No. 420** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

- i. One complainant Zayab s/o Haroon Rashid r/o Mohr: Al-Sheravi, District Hangu bearing Mobile No. 0347-9452707 has appeared before the undersigned and complained against you, Constable Noman Haider No. 420 regarding his blackmailing on social media through your Whatsapp No. 0336-9583028 by submitting the photocopy of messages (copy annexed).
- ii. You being a member of disciplined force had acted in an undisciplined manner and criminal gross misconduct on your part, which cannot be ignored.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations, SP Investigation is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

**ATTESTED**

*[Signature]*  
to be true copy  
Advocate

*[Signature]*  
DISTRICT POLICE OFFICER,  
HANGU

21 /EC, dated 19/05/2022.

Copy of above, to:-

SP Investigation :- The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.

The **Accused official**:- with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

Amc 3<sup>rd</sup> (15) (180)

OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel: 0925-623878 Fax 0925-620133

**ORDER**

Header No. 420 under the Khyber Pakhtunkhwa Police Rules 1975 (Amendment 2014).  
Brief facts of the case are as under:-

- i. One complainant Zayab s/o Haroon Rashid r/o Moh: Al-Sheravi, District Hangu bearing Mobile No. 0347-9452707 was appeared before the undersigned and complained against you, Constable Noman Haider No. 420 regarding his blackmailing on social media through your What-App No. 0336-9583028 by submitting the photocopy of messages (copy annexed).
- ii. Besides he being a member of disciplined force, a habitual absentee, narcotics addicted and found involved in attempt of child kidnapping vide DD No. 32, dated 01.04.2021 P.S City, Hangu as such acted indisciplined manner and criminal gross misconduct on his part, which cannot be ignored.

He was served with Charge Sheet and statements of allegations vide this office No. 24/EC, dated 19.05.2022, to which he submitted his reply to the SP, Investigation Hangu who was appointed as Enquiry Officer to conduct departmental enquiry against him. After completion of enquiry, the Enquiry Officer submitted finding report vide his office Memo: No. 1006/Inv: dated 17.06.2018 in which defaulter Constable Noman Haider No. 420 is indisciplined official having criminal mind and he is a bad name for police force as well as he could not become a good police officer in future while under three. Similarly, his total service is 02 years, 05 months & 19 days in which his one year approved service has already forfeited in light of his activities and reputation as per his service record; therefore, the enquiry officer recommended him for awarding a major punishment of Removal from Service under Police Rules 12-24.

Consequently, he was called in orderly room on 06.07.2022 and heard in person, but he failed to submit any plausible reply in his self defence.

Subsequently, Final Show Cause Notice was issued to him vide No. 119/EC, dated 06.07.2022 to which he submitted his reply on 12.07.2022 and found unsatisfactory as well.

Keeping in view of above and having gone through available record, the undersigned has arrived at the conclusion that defaulter Constable Noman Haider No. 420 is a indisciplined official by conducting the above mentioned gross misconduct, irregularities, irresponsibility and non-professionalism, which indicates that he was not interested to serve further. Moreover, in these circumstances his retention in Police Department is burden on public exchequer, therefore, I, Asif Bahader, (PSP), District Police Officer, Hangu in exercise of the powers conferred upon me under the Rules ibid, dispense with general proceedings and awarded him a major punishment of Removal from Service under Police Rules 12-24 with immediate effect.

Order Announced.  
OB No. 244  
Dated 19/7/2022

**ATTESTED**  
*(Signature)*  
to be true copy  
Advocate

DISTRICT POLICE OFFICER,  
HANGU

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. 4122-30/EC, dated Hangu, the 19/07/2022

Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat for favour of information, please.

2. Pay Officer, EC, Reader & OASI for necessary action.

DISTRICT POLICE OFFICER,  
HANGU

**BETTER COPY OF THE PAGE NO. 15**

**ORDER**

This Order is passed on the department enquiry against Constable Noman Haider No.420 under the Khyber Pakhtunkhwa Police Rules 1975 (Amendment 2014)

Brief Facts of the case are as under:-

1. One Complainant Zayab S/o Haroon Rashid R/o Molt: Al-Sheravi District Hangu bearing Mobile No. 0347-9452707 was appeared before the undersigned and complained against you. Constable Nouman Haider No. 420 regarding his blackmailing on social media through your Whatsapp No. 0330-9583028 by submitting the photocopy of messages. (Copy annexed).
2. Besides he being a number of disciplined force, a habitual absentee, narcotics addicted and found involved to attempt of child kidnapping vide DD No. 32 dated 01.04.2021 P.S City, Hangu as such acted indisciplined manner and criminal gross misconduct on his part, which cannot be ignored.

He was served with charge sheet and statements of allegations vide this office No. 21/EC dated 19/05/2022 to which he submitted his reply to the SP Investigation Hangu who was appointed as Enquiry Officer to conduct departmental enquiry against him. After completion of enquiry the Enquiry Officer submitted finding report vide his office Memo No. 1606/Inv: dated 17/06/2018 in which defaulter Constable Nouman Haider No. 420 is indisciplined official having criminal mind and he is a bad name for police force as well as he could not become a good police officer in future while under three. Similarly his total service is 02 years, 05 months & 19 days in which his one year approved service has already forfeited in light of his activities and reputation as per his service record: therefore the enquiry officer recommended him for awarding a major punishment of Removal from Service under Police Rules 12-21.

Consequently, he was called in orderly room on 06/07/2022 and heard in person but he failed to submit any plausible reply in his self defence.

Subsequently, final Show Cause Notice was issued to him vide No. 119/EC, dated 06/07/2022 to which he submitted his reply on 12/07/2022 and found unsatisfactory as well.

Keeping in view of above and having gone through available record, the undersigned has arrived at the conclusion that defaulter Constable Noman Haider No. 420 is a indisciplined official by conducting the above mentioned gross misconduct, irregularities, irresponsibility and non-professionalism, which indicates that he was not interested to serve further. Moreover, in these circumstances his retention in Police Department is burden on public exchequer, therefore, I Asif Bahader (PSP) District Police Officer, Hangu in exercise of the powers conferred upon me under the Rules ibid, dispense with general proceedings and awarded him a major punishment of Removal from Service under Police Rules 12-21 with immediate effect.

Order Announced

OB No. 244

Dated 19/07/2022

District Police Officer  
Hangu

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU

No. 4128-30/EC, dated Hangu, the 19/07/2022

Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat for favour of information, please.

2. Pay Officer, EC, Reader & OASI for necessary action.

District Police Officer  
Hangu

بعد اجلاس انسپیکر جنرل آف پولیس خیدر پورہ پنہاور

Ex پولیس کاٹھنپن نغان خیدر پورہ رضیہ الہیہ سائین کم ملک آباد پورہ۔ اسلانتا۔

نہا

- 1- ڈسٹرکٹ پولیس آفیسر صاحب صاحب صاحب
- 2- ریجنل پولیس آفیسر صاحب صاحب صاحب
- 3- زیار خان ورم برون الرشید سائین کم الرشید پورہ
- 4- سفیان احمد ورم سلیف ایٹھ سائین کم بھادر پورہ پانڈہ صاحب صاحب صاحب

صدر اس ایمل حذوف منسلک / حکم عددرہ ڈسٹرکٹ پولیس آفیسر صاحب صاحب صاحب  
 نمبر 244 فورم 1977/22 حکمی رو سے ایملڈنٹ بلڈ 22/1977 پولیس کاٹھنپن  
 کو منسلک نہا دیگر ملازمت نہا سے بہ طرف لیا گیا۔

امدادی ایمل

منظور اس ایمل حذوف منسلک / حکم عددرہ ریٹائرڈ 1977/22  
 حذوف منسلک / حکم عددرہ ریٹائرڈ 22/1977 منسوخ رکھا گیا اور  
 باطل قرار دے جا کر ایملڈنٹ کو ملازمت نہا پر مہر علیہ  
 مراعات کے بحال کئے جانے کا حکم صادر فرمایا جائے  
 ایملڈنٹ صاحب زین علیہ طرف پر داری ہے۔

غیاث علی

حقانی

- 1- یہ کہ ایملڈنٹ کی مل ملازمت عرصہ در حقن معالی ہے۔
- 2- یہ کہ ایملڈنٹ ایملی تعلیم یافتہ ہے۔
- 3- یہ کہ ایملڈنٹ عرصہ با عسور اور نادرہ گناہ ہے۔
- 4- یہ کہ و قلم حادثہ موثر سا منسلک کا ہے۔ سسی سفیان احمد حادثہ  
 مذکور میں زخمی ہوا۔ تمام سبب سے روز تا پیم رپورٹ دینے ہوا
- 5- یہ کہ متکور خان احمد سیف الہیہ نغان عددرہ صاحب صاحب صاحب نے  
 خالص طور پر راجی انعام الرشید ڈرایا۔ سفیان احمد مجبوراً نے  
 ایملڈنٹ کو دل سے حذوف کر کے ان کے حذوف زید تا نون کا وطن  
 نہا کے کا حذوف لیا۔ نغان صاحب صاحب صاحب صاحب صاحب صاحب صاحب

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6۔ یہ کہ رپورٹ نمبر 32 روزنامہ 4/21 کی کوئی تنازنی حقیقت نہ رہی۔  
وجوہات یہ ہیں

1۔ یہ کہ ہر دو فیصلہ جات رسید شدہ تھیں اور ہر دو فیصلہ جات قانونی حلف ناموں پر حلف زماں  
واقعات، حقائق اور روایتوں پر مشتمل ہے۔ اس کے قابل جوابی نہیں ہیں۔ ہر دو فیصلہ جات  
مستوفیہ، مستوفیہ، کاملہ اور باطل قرار دیئے جا کر اپیلڈ تھا تو عدالت سرکار  
پر حقیقت کو نہیں مانتی تھی۔ ہر دو فیصلہ جات کے حوالے سے تینوں  
ہر دو فیصلہ جات لکھے ہیں

2۔ یہ کہ اپیلڈ تھا ہے مقصور اور ناکردہ تھا ہے۔  
3۔ یہ کہ اپیلڈ تھا تو فیصلہ الزامات نہیں دی گئی۔  
4۔ یہ کہ عید الزامات خلاف اپیلڈ تھا ہر دو فیصلہ جات بنیاد میں گرفتہ ہو رہا ہے

5۔ یہ کہ اپیلڈ تھا ہے نہ تو بلیک بلیک بڈز ہوئے ہیں۔ 28 30 35 36  
کے کوئی ٹریس اور عید عید بانہ، پھر مانہ بد اعتدالی کا رتبہ 1۔ اور میں اپیلڈ  
6۔ یہ کہ ڈکوریٹری رپورٹ ہر دو فیصلہ جات خلاف واقعات، حقائق، دلائل، حقائق ہے۔ DPO

7۔ یہ کہ DPO صاحب حلقوں نے فیصلہ الزامات اپیلڈ تھا ڈسٹریکٹ نہیں کی۔ اور میں  
خلاف الزامات کیا گیا۔ اور میں ڈکوریٹری رپورٹ اپیلڈ تھا ڈسٹریکٹ نہیں کی۔ اپیلڈ  
کو جملہ کارروائی کے خلاف قانونی طور پر شروع رکھا گیا۔

8۔ یہ کہ وقوم عورم 29/21 کا ہے۔ عید رپورٹ عورم 4/21 کے لئے مدد 32 روزنامہ  
تھانہ میں حلقوں میں 3/2 بعد دزج آ رہی تھی۔

9۔ یہ کہ عید کارروائی آپس کی ملی تھی۔ باہمی سازش سے کوئی ایک بوقت وقوم عورم اپیلڈ تھا  
جاری ہے۔

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Amul F (19)

POLICE DEPTT:

KOHAT REGION

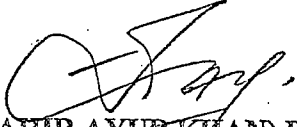
ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Nouman Haider No. 420 of district Hangu against the punishment order, passed DPO Hangu vide OB No. 244, dated 19.07.2022 whereby he was awarded major punishment removal from service on the allegations of blackmailing one Zayab Khan s/o Haroon Rashid Alsheravi district Hangu and having dubious character i.e. absenteeism and narcotics addicti etc.

He preferred appeal to the undersigned, upon which comments were obtained from DPO Hangu and his service record was perused. He was also heard in person Orderly Room held in this office on 13.09.2022. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.



I have gone through the available record which indicates that the allegations leveled against the appellant have been proved and the same have also been established by the E.O in his findings. The appellant has tried to blackmail the complainant through Whatsapp, copy / print of which was also produced by the complainant to DPO Hangu. Record indicates that the appellant is a habitual absentee and previously found involved in attempt of child kidnapping. Therefore, in exercise of the powers conferred upon the undersigned, his appeal being devoid of merits is hereby rejected.


Order Announced  
13.09.2022

  
(TAHIR AYUB KHAN) PSP  
Region Police Officer,  
Kohat Region.

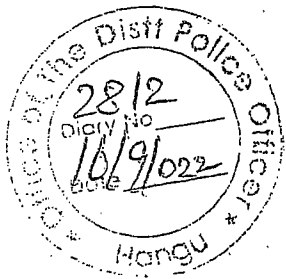
No. 13471 /EC, dated Kohat the 14/09/2022.


Copy to District Police Officer, Hangu for information and necessary action w/r to his office Letter No. 4965/LB, dated 06.09.2022. His Service Record is returned herewith.

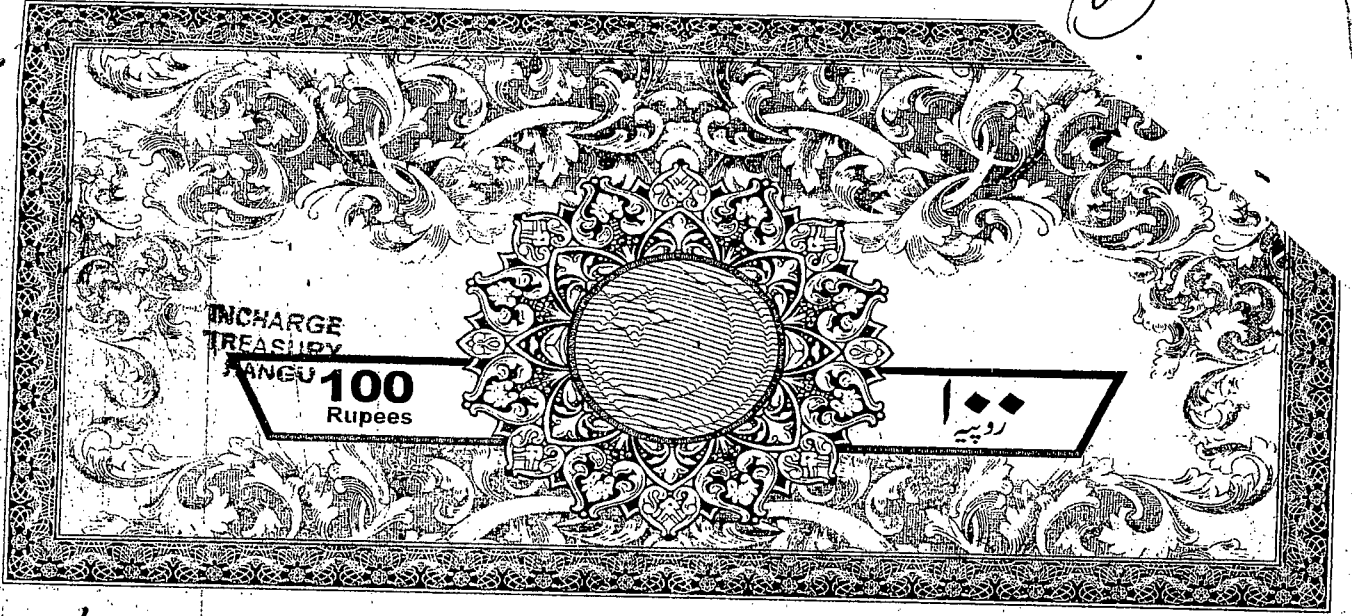
  
(TAHIR AYUB KHAN) PSP  
Region Police Officer,  
Kohat Region.

D.P.O Hangu  
15/09/2022



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Advocate





شہید بذریعہ صفیان احمد بنام نعمان حیدر ولد رفیع الدین

تھانہ سٹی ہنگو

نمبر مقدمہ مورخہ جرم

بیان حلفی بصیغہ راضی نامہ

مکہ صفیان احمد ولد سیف اللہ خان بہادر بانڈہ ہنگو کا ہوں۔

۱۔ حلفاً بیان کرتا ہوں کہ میرا نام ولدیت سکونت صحیح و درست ہے۔

۲۔ حلفاً بیان کرتا ہوں کہ بمقدمہ عنوان بالا میں ہمارے مابین ثالثان نے خاگی طور پر راضی نامہ / تصفیہ کر لیا ہے۔

۳۔ حلفاً بیان کرتا ہوں کہ میں نے ثالثان کے فیصلہ کے مطابق ملزم کو دل سے معاف کر کے انکے خلاف کوئی قانونی کارروائی نہ کرنے کا فیصلہ کیا ہے۔

۴۔ حلفاً بیان کرتا ہوں کہ اگر ملزم کو بصیغہ راضی نامہ مقدمہ سے بری ذمہ قرار دیا جائے تو مجھے کوئی اعتراض نہیں۔

صفیان احمد ولد سیف اللہ خان بہادر بانڈہ ہنگو مجروح

سلمان حیدر ولد رفیع الدین سکنہ ملک آباد ہنگو

14101-1074953-7

تیور خان ولد سیف الرحمن سکنہ ملک آباد ہنگو

14101-9327465-1

عتیق الرحمن ولد سیف اللہ خان براور مجروح

14101-1709581-7

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ADVOCATE  
7 MAY 2021  
OFFICE DIVISIONS  
ADDITIONAL DISTRICT JUDGE

Navees  
Sulshinwar

ATTESILL

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Advocate

Handwritten text in Urdu script, appearing to be a legal document or a copy of a court order. The text is dense and covers most of the page, with some lines underlined. It includes various names, dates, and legal phrases.

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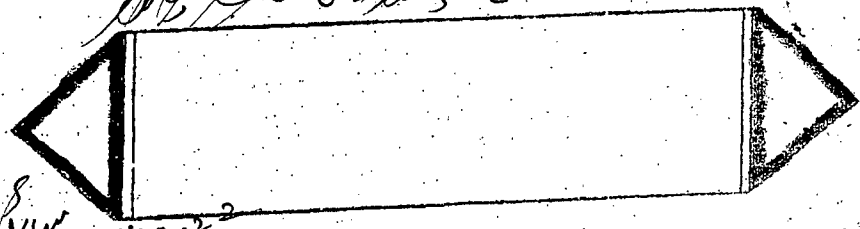
01/06/2010

Handwritten signature or name





سروس سہ ماہیہ  
بعدالت عالیہ



2022ء مئی  
I.G.P نام

نشان

مدرسہ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و عمل کاروائی متعلقہ  
آن مقام ~~مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و عمل کاروائی متعلقہ~~  
مقرر کر کے اتر کر آیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی عمل کاروائی کا مکمل اختیار ہوگا۔ نیز  
دیکل صاحب کو راضی نامہ کرنے و تقریرات ہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک درو پیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظارتی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور دیکل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرداخت منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجا نہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دیکل صاحب پابند ہوں گے۔ کہ پیروی  
مذکورہ کریں۔ لہذا اذکالت نامہ لکھ دیا کہ مندر ہے۔

الرقوم 18  
ماہ اکتوبر 2022ء

بمقام لستناد سروس سہ ماہیہ کے لئے منظور ہے۔

Accepted مع Attested

Signature

نشان  
دعویٰ  
جرم