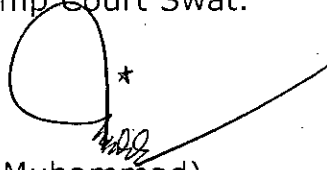


07.09.2022

Appellant in person present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Supreme Court of Pakistan. Adjourned. To come up for arguments on 06.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)
Member (Executive)
Camp Court Swat



(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

06.10.2022

Appellant alongwith his counsel present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he is proceeding for appearance in cases fixed in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 09.11.2022 before the D.B.at Camp Court Swat.



(Rozina Rehman)
Member (J)
Camp Court Swat



(Salah-Ud-Din)
Member (J)
Camp Court Swat

8th June, 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Ali Rehman, SI for respondents present.

Counsel are on strike. To come up for arguments on 05.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Swat

05.07.2022

Appellant with counsel present.

Noor Zaman Khattak, learned District Attorney alongwith Ali Rehman SI for respondents present.

Request for adjournment was made on behalf of learned counsel for appellant as he has not made preparation of the case. Adjourned. To come up for arguments on 03.08.2022 before D.B at Camp Court, Swat.




(Fareeha Paul)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat

3.8.22


Due to summer vacation the case is adjourned to 7-9-22 for the same.



03.01.2022

Appellant alongwith his counsel present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Para-wise reply on behalf of respondents No. 1 to 3 submitted, which is placed on file and copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 08.03.2022 before the D.B at Camp Court Swat.


(Salah-Ud-Din)
Member (J)
Camp Court Swat

08.03.2022

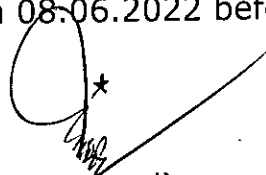
Due to retirement of the Hon'ble Chairman, the case is adjourned to 10.05.2022 for the same as before.



Reader

10.05.2022

Appellant in person present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 08.06.2022 before the D.B at Camp Court Swat.


(Mian Muhammad)
Member (E)
Camp Court Swat

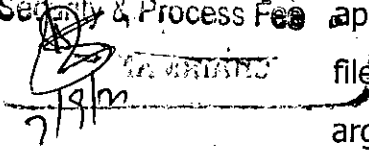

(Salah-ud-Din)
Member (J)
Camp Court Swat

23.08.2021

Counsel for the appellant present. Preliminary arguments heard.

The appellant is aggrieved from imposition of major penalty of reversion from ASI to his substantive rank of Head Constable. Points raised need consideration. The appeal is admitted for full hearing, subject to all just and legal objections including that of limitation to be determined during course of full hearing. 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 at Peshawar 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 01.11.2021 before the D.B, at camp court, Swat.


Appellant Deposited
Security & Process Fee

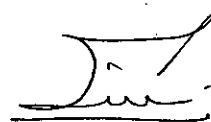

7/9/21


Chairman
Camp court, Swat

01.11.2021

Appellant in person present. Mr. Ali Rehman, S.I (Legal) alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for submission for reply/comments as well as arguments before the D.B on 03.01.2022 at Camp Court Swat.

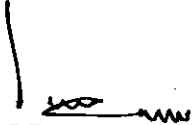



(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court Swat


(Salah-Ud-Din)
Member (J)
Camp Court Swat

FORM OF ORDER SHEET

Court of _____

Case No.- 2767 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/02/2021	<p>The appeal of Mr. Bahrul Mulk presented today by Mr. Muhammad Javed Khan 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 12/12/2021</p>
2-	01-04-21	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>03/05/21</u></p> <p style="text-align: right;"> REGISTRAR (J)</p>
	26.07.2021	<p>To come up for preliminary hearing on 23.08.2021 before S.B at Camp Court, Swat. Notices be issued to appellant/counsel for the date fixed.</p> <p style="text-align: right;"> Chairman</p>

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. _____/2021

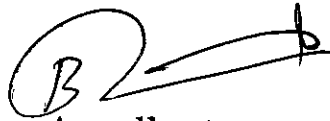
Bahrul Mulk S/o Noor Ul Huda R/o Bayna, Post Office Choga,
Tehsil Puran, District Shangla..... *Appellant*

VERSUS

Provincial Police Officer Government of Khyber Pakhtunkhwa
and others..... *Respondents*


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5	Copy of the inquiry report of the SP Upper Swat dated 18/06/2020	"B"	14-18
6	Copy of the order dated 25/06/2020	"C"	19-
7	Copy of the appeal	"D"	20-21
8	Copy of the order dated 01/09/2020	"E"	22
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10	Copy of the order no. 229 dated 22/01/2021	"G"	25
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Appellant

Through Counsel


Muhammad Javaid Khan
Advocate, Supreme Court of Pakistan
Office: Allah-o-Akbar Masjid,
College Colony, Saidu Sharif, swat
Cell: 0343-9607492

①

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 2767 /2021

Diary No. 2717

Dated 12/2/2021

Bahrul Mulk S/o Noor Ul Huda R/o Bayna, Post Office Choga,
Tehsil Puran, District ShanglaAppellant

VERSUS

1. Provincial Police Officer Government of Khyber Pakhtunkhwa at Central Police Office (CPO) Peshawar
2. Deputy Inspector General of Police / Regional Police Officer (RPO) Malakand Region at Swat
3. District Police Officer Swat at Gulkada, Swat

.....Respondents

Service Appeal Under Section 4 of Service Tribunal Act read with other relevant provisions against the impugned order dated. 22/01/2021 issued by respondent no. 1 whereby the revision petition of the appellant against the order no. 7547 dated 01/09/2020 of respondent No.2 and order dated 25/06/2020 of respondent no. 3 was rejected illegally, unlawfully and unconstitutionally.

Filed to-day
12/2/2021
Registrar

PRAYER:

On acceptance of this service appeal the impugned orders of respondents Nos. 1 to 3 dated 22/01/2021, 01/09/2020 and 25/06/2020 respectively may kindly be declared illegal,

(2)

unlawful and unconstitutional, and the reversion of the appellant may be declared illegal, unlawful and unconstitutional and may be reinstated / re-designated to his original rank of ASI with the same seniority position and all other service back benefits.

Any other relief, deemed fit in the given circumstances of the case may also be awarded in favor of appellant against respondents.

Respectfully Sheweth:

The appellant submits as under:

1. That the appellant was appointed in the police department in the year 1991.
1. That the appellant performed his duties to the utmost satisfaction of his superior officers. (Commendation certificates awarded to the appellant are attached herewith as annexure "A")
2. That during the days of insurgency in the Malakand region, the appellant performed his duties honestly and gallantly. In this regard the service record of the appellant is very much clear.

3

3. That the appellant was promoted to the rank of Head Constable in the year 2009, later on was promoted to the rank of ASI in the year 2011.
4. That the bad days of the appellant started in the year 2020 when the appellant was posted as incharge Police Post Barama (Police Station Mingora), Mingora, District Swat, when an inquiry was started against the appellant on unanimous complaint. The copies of the said complaint was never provided to the appellant.
5. That later on, the SP Upper Swat called the appellant and told him that there is an inquiry against him but he also did not provided any copies of any proceedings against the appellant.
6. That the said SP Upper Swat told the appellant that the appellant may produce certificates / statement from superior bosses / officers in respect of performance / duties.
7. That the appellant produced the statement / certificates from the then SDPO City Circle Muhammad Anwar Khan SHO Police Station Mingora etc. who deposed in favor of

4

the appellant. The statement of the said officers are part of the inquiry report submitted by the SP Upper Swat on 18/06/2020. The said report also supports the stance of the appellant. (Copy of the inquiry report of the SP Upper Swat dated 18/06/2020 is attached herewith as annexure "B")

8. That keeping aside the statements / certificates of the superior officers of the appellant, the respondent no. 3 issued an order dated 25/06/2020, whereby, the major punishment of reversion was awarded to the appellant by reverting him to his substantive rank of Head Constable (BPS-09). (Copy of the order dated 25/06/2020 is attached herewith as annexure "C")

9. That the appellant then filed an appeal before the respondent no. 2 on 08/07/2020. (Copy of the appeal is attached herewith as annexure "D")

10. That the said appeal of the appellant was filed vide order no. 7547 dated 01/09/2020 by respondent no. 2. (Copy of the order

5

dated 01/09/2020 is attached herewith as annexure "E")

11. That the appellant then filed a revision before the respondent No.1 under Rule 11(a) of the Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014) on 19/09/2020. (Copy of the revision dated 19/09/2020 is attached herewith as annexure "F")
12. That the said revision was rejected by the board vide order no. 229 dated 22/01/2021. (Copy of the order no. 229 dated 22/01/2021 is attached herewith as annexure "G")
13. That the appellant being aggrieved from the orders of the respondent nos. 1 to 3 mentioned above, files this service appeal inter alia on the following grounds, amongst others.

GROUND:

- A. That the impugned orders of the respondents nos. 1 to 3 are illegal, unlawful and unconstitutional.
- B. That no proper inquiry officer was appointed nor any proper inquiry was

6

conducted against the appellant, which is much clear from the inquiry report dated 18/06/2020 and the order of the respondent no. 3 dated 25/06/2020.

C. That no final show cause notice was given to the appellant before awarding the major punishment.

D. That the corresponding rules of the Police Rule, 1975 were violated during the so called inquiry proceedings.

E. That there is no iota of evidence available against the appellant in respect of the allegations, rather the whole action was taken against the appellant was initiated and taken on the instigation of the drug traffickers against whom the appellant has registered about fifty cases. In this regard the statement of Didar Ghani the then SDPO dated 12/06/2020, statement of

7

Muhammad Anwar Khan SHO P.S Mingora

etc. are very much clear.

F. That other grounds not specifically raised will be argued with the permission of this Honorable Court at the time of arguments.

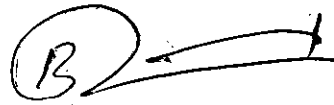
15. That this appeal is being filed against the orders dated: 22/01/2021 of respondent no. 1 hence this is in time and this Honorable Tribunal has got the jurisdiction, and this appeal is in time

It is therefore humbly prayed that On acceptance of this service appeal the impugned orders of respondents Nos. 1 to 3 dated 22/01/2021, 01/09/2020 and 25/06/2020 respectively may kindly be declared illegal, unlawful and unconstitutional, and the reversion of the appellant may be declared illegal, unlawful and unconstitutional and may be reinstated

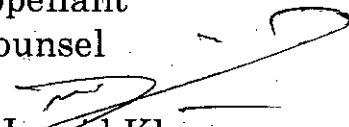
8

/ re-designated to his original rank of ASI
with the same seniority position and all
other service back benefits.

Any other remedy which is just, appropriate
and efficacious may also be awarded in
favor of the appellant, please.



Appellant
Through Counsel



Muhammad Javaid Khan
Advocate Supreme Court of Pakistan

Dated: 11/02/2021

9

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2021

Bahrul Mulk S/o Noor Ul Huda R/o Bayna, Post Office Choga,
Tehsil Puran, District Shangla.....*Appellant*

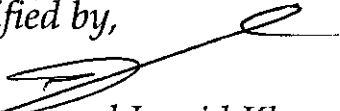
VERSUS

Provincial Police Officer Government of Khyber Pakhtunkhwa
and others..... Respondents

AFFIDAVIT


*I, Bahrul Mulk S/o Noor Ul Huda R/o Bayna, Post Office Choga,
Tehsil Puran, District Shangla, do hereby solemnly affirm and declare
on oath that all the contents of this Service Appeal are true and correct
to the best of my knowledge and belief, and nothing has been kept
concealed from this Honorable Tribunal.*

Identified by,


Muhammad Javaid Khan

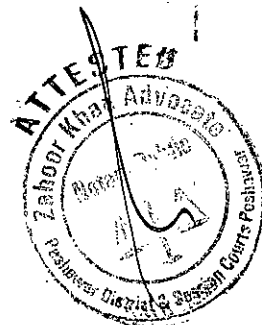
Advocate Supreme Court of Pakistan

DEPONENT



Appellant

Bahrul Mulk



(10)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2021

Bahrul Mulk S/o Noor Ul Huda R/o Bayna, Post Office Choga,
Tehsil Puran, District Shangla.....*Appellant*

VERSUS

Provincial Police Officer Government of Khyber Pakhtunkhwa
and others..... *Respondents*

ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

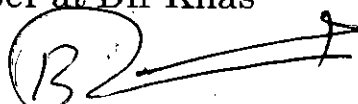
Bahrul Mulk S/o Noor Ul Huda R/o Bayna, Post Office Choga,
Tehsil Puran, District Shangla

CNIC:15505-0227615-3

Cell: 0340-9078648

ADDRESS OF THE RESPONDENTS

1. Provincial Police Officer Government of Khyber Pakhtunkhwa at Central Police Office (CPO) Peshawar
2. Deputy Inspector General of Police / Regional Police Officer (RPO) Malakand Region at Swat
3. District Police Officer Dir Upper at Dir Khas



APPELLANT

Through Counsel


Muhammad Javaid Khan
Advocate, Supreme Court of Pakistan

11

Annexme-A

Khuzdar Pakhtunkhwa Police



Commendation Certificate

CLASS III

To ASI Bahrul Mulk (Incharge PP Barama)

in Recognition of

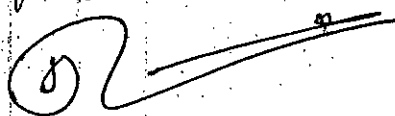
Hardworking and dutiful Police Officer

with cash reward Rs.1000/-

No. _____

Date _____


Qasim Ali Khan, PSP
District Police Officer
Swat

Attested


(12)

COMMENDATION CERTIFICATE

K.P.K Police



Class III

Granted by Mr. Muhammad Asjad D/O Buner

Granted to ASI Babul Milk

son of _____ R/O Village _____

Police Station Towax District Buner

In Recognition of his good performance for the month of November
2016.

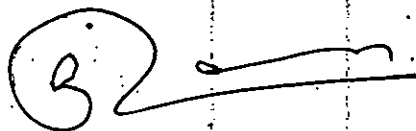
Cash Reward 500/-

O.B No 129

Dated 16-12-2016


District Police Officer
Buner.

A tested



13

COMMENDATION CERTIFICATE

K.P.K Police



Class III

Granted by Mr. Muhammad Ishaq Ah Buner

Granted to Abi Babul Malik

son of _____ R/O Village _____

Police Station Jowar District Buner

In Recognition of his excellent performance during last four months.

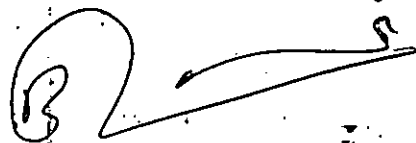
Cash Reward Rs. 1000/-

O.B No 11

Dated 27.01.2017


District Police Officer
Buner

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14

Annexure B

SP اپر سوات

ریڈز نمبر 98 مورخہ 18/06/2020

جناب ریجنل پولیس آفیسر ملا کٹر ریج

بجانب :-

انکوائری رپورٹ آڈاں ASI بحسب الملک

عنوان :-

تفصیل انکوائری :-

جناب عالی!

بحوالہ مشمولہ چارج شیٹ نمبری 4380-83/E مورخہ 03/06/2020 بجاریہ جناب RPO صاحب ملا کٹر ریج تحریر خدمت ہوں کہ چارج شیٹ بالا میں انکوائری شروع کی گئی۔

دوران انکوائری ASI بحسب الملک کو طلب کر کے زبانی سنا گیا اور مذکورہ کا بیان قلمبند کر کے شامل کاروائی ہے۔

دوران انکوائری (1) دیدار غنی خان SDPO سٹی سرکل (2) محمد انور خان INSP/SHO تھانہ میگورہ (3) محمد رحیم خان

INSP/OII تھانہ میگورہ (4) بخت شیردان خان SI انچارج DSB سوات کے بیانات قلمبند کر کے جنہوں نے ASI بحسب الملک کے حق میں بیانات دیکر بیان کیا کہ ASI مذکورہ نے ایمانداری سے اپنی ذیوثی سرانجام دی ہے۔

انکوائری ہذا کے سلسلے میں علاقہ باراما میں خفیہ معلومات کر کے ASI مذکورہ نے دوران تعیناتی علاقہ میں فحاش عورتوں (1) مسماۃ

دلشاد سکنہ قونج دہہ باراما (2) مسماۃ مومنہ سکنہ گلی منیر اکبازی حاجی بابا کے ساتھ تعلقات استوار کئے تھے اور مذکورہ ASI کئی بار وہاں پر دیکھا گیا ہے۔

دوران انکوائری مزید معلوم ہوا کہ مسمی سید محمد اسحاق ولد رحیم گل ساکن ملوک آباد میگورہ سے بکریاں چوری ہوئی

تھی۔ ASI بحسب الملک نے چوری شدہ بکریوں کے ملزمان کو معلوم کر کے ملزم فریق سے 50 ہزار روپے لیکر مدعی فریق کو صرف 9 ہزار روپے پر مطمئن کر کے باقی رقم جیب خود میں رکھی اور معاملہ ختم کیا۔

دوران تعیناتی ASI مذکورہ بحوالہ OB نمبر 64 مورخہ 23/04/2020 کو سپینڈ ہو کر پولیس لائن کلوز کیا گیا تھا۔ مذکورہ

دوبارہ بحال ہو کر چوکی باراما میں تعینات کیا گیا تھا۔

نتیجہ انکوائری :-

بعد از انکوائری و تفصیلی معلومات پایا گیا۔ کہ مذکورہ ASI بحسب الملک کا دوران تعیناتی مختلف اضلاع سے بغیر پیریڈ مکمل کئے تبدیل

کیا گیا ہے۔ جس کی تفصیل ذیل ہے۔ مورخہ 15/10/2014 ضلع شانگلہ سے ضلع دیر اپر، مورخہ 26/06/2015 ضلع دیر اپر سے ضلع

بونیر، مورخہ 09/10/2017 کو ضلع بونیر سے ضلع شانگلہ، مورخہ 17/01/2018 کو ضلع شانگلہ سے ضلع سوات تبدیل کیا گیا۔ اس

عرصہ تعیناتی میں ASI بحسب الملک کو کئی بار چارج شیٹ ہائے مل چکے ہیں اور دو (2) بار سپینڈ بھی ہو چکا ہے۔ مزید یہ کہ ASI مذکورہ ایک

کریٹ پولیس آفیسر ہے جس نے دوران تعیناتی چوکی باراما میں فحاش و بدنام زمانہ عورتوں کے ساتھ تعلقات قائم کئے ہوئے تھے اور معمولی قسم

کے معاملات میں بھی لوگوں سے پیسے لیا کرتا تھا۔ جس سے یہ بات عیاں ہے کہ مذکورہ ASI محکمہ پولیس کیلئے بدنامی کا سبب بن رہا ہے مذکورہ

ASI بحسب الملک کے خلاف سخت محکمانہ کاروائی کی سفارش کی جاتی ہے۔

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سپرٹنڈنٹ آف پولیس

اپر سوات

3

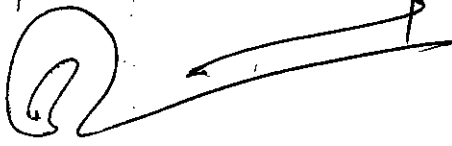
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بیان اذان دیدار فنی SDPO مٹی سرکل

نے بددیانتی بیان کیا کہ میرے دوران تعیناتی ASI بحرہنگ ASI انچارج پو کی ہزارہہ تعینات تھا۔
ASI نہ کو رو نے اپنا اپنی اجنبی امانداری اور خوش اسلوبی سے سرانجام دئی ہے۔ نہ کو رو نے منشیات فروشان
اور سامن دشمن من سر کے گیرانگ کر کے جس کی خلاف تقریباً 50/49 مقدمات درج رجسٹر کے ہیں۔ نہ کو رو
کے خلاف جتنے کسی قسم کی شکایت موصول نہیں ہو ہے۔


دیدار فنی SDPO مٹی سرکل

المرقوم:- 12-06-2020

A teste e


(16)

بیان محمد الودعان 5110 ق.م.س.گرو

غذ بیان کیاد محمد الملک خان ۸۴۱ عی ماقہ حوی ارامہ میں
میںبت امارج تقریباً ۴ ماہ وہ کھانے۔ ۸۵۱ نے دوران نفسانی
مباح دشمن معاہدہ کے خلاف خودا منشیات میں بہترین
پراگرس کیا ہے۔ وہ کور کے خطاب سے کسی قسم کو کوئی
مشایت نہیں ملی ہے یہ سہرا بیان ہے


SHO-Insp-Ps. Mingora
12-26-200

A Teste &

8

بیان اثرات ای تحت مشورتن پر ۳۳۵۵ ۳۳۵۵
 بدویات بیان کیا اور محکمہ ایک زمانہ پر
 جوی بارہ سے سکتا تھا۔ منبہات فرشتوں سے
 سماج دانش و تفریح و تفریح و تفریح کیا ہے انما۔ اس
 دوران فرکارہ و تفریح و تفریح و تفریح و تفریح

۳۳۵۵
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 ۱۲-۲۰۲۰

A testis


(18)

بیازہ، آدات، انجمن محمد رفیم خان CIO تھا۔ مکرو

نے دوہرا نٹ بیان کیا۔ کیا دیکھ کر دوران تصنیف NSI بمقامات ایچ آر جی
مراستہ تصنیف تھا ذکرہ NSI نے اپنی ڈیوٹی ثابت ایمانداری اور
خلوص نیت سے کی ہے۔ ذکرہ نے معاجہ و تحقیق سے اس امر کے خلاف
حصولاً مثبت رپورٹوں کے خلاف سب سے بڑا گورنمنٹ میں کیا
ہے۔ ذکرہ کے خلاف کسی قسم کا کوئی حمایت موصول نہیں
ہوئی۔ یہی سب بیان ہے۔

سنا
CIO-PS-Mingota
12-06-2011

A test d



(19)

Annexure-C

ORDER

This order pertains to the Charge Sheet/Summary of Allegations issued to ASI-Bahrul Mulk No.907/M the then Incharge Police Post Barama PS Mingora by Regional Police Officer Malakand Region at Saidu Sharif Swat (Now Dir Upper District) regarding his involvement in corrupt practices, besides his bad character has also been reported which shows his in-efficiency and negligence in performing of his official duty.

He was issued charge sheet statement of allegations by the Regional Police Officer vide his Office Endst: No.4380-83/E, dated 03-06-2020 and Mr. Farman Ullah Khan Superintendent of Police Upper Swat was appointed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry recorded statements of all concerned. The Enquiry Officer in his finding after thoroughly enquiry recommended the defaulter ASI for strict departmental punishment. The Regional Police Officer returned the enquiry papers to this office and ordered to be award him an exemplary punishment vide Region Office Swat Memo: No.5038/E, dated 24-06-2020.

Keeping in view the long service in the Police Force as well as poor family back ground of the delinquent Police Officer, I, QASIM ALI KHAN, PSP, District Police Officer, Swat being competent authority, in exercise of power vested in the undersigned under Rules 2 (iii) of Police Disciplinary Rules - 1975, awarded him a major punishment of reverted to his substantive rank of Head Constable (BPS-09) with immediate effect.

Order announced.

District Police Officer
Swat

O.B. No. 99

Dated: 25.6.2020 No 11012-14 E.O. 26-6-2020

Copy to the:-

1. Regional Police Officer Malakand Region at Saidu Sharif Swat
FOR INFORMATION PLEASE
 2. District Police Officer Dir Upper, alongwith complete enquiry file containing 61 pages for necessary entry in his Service record and placing at his Fuji Missal.
 3. Establishment Clerk
- For necessary action, please.

A tested
Q

(55)

بحضور جناب ڈی آئی جی صاحب ملاکنڈ ریج بمقام سید و شریف سوات۔
اپیل بمراد بحالی سائل ہیڈ کنسٹیبل بجر الملک جو کہ بحوالہ حکم OB نمبر 99 مورخہ
25.06.2020 بحکم DPO صاحب ضلع سوات رپورٹ کیا گیا ہے۔ حالانکہ سائل بے گناہ ہے۔

جناب عالی!

گزارش منجانب سائل حسب ذیل ہے۔

نمبر 1 یہ کہ سائل بحیثیت ASI پولیس چوکی بارامہ (تھانہ بینگورہ) میں تعینات تھا۔ جبکہ سائل کے ہمراہ تھانہ بینگورہ چوکی بارامہ میں تعیناتی کے دوران اپنی بال بچ ہمراہ تھی۔ اور سائل احسن طریقہ سے ڈیوٹی سرانجام دے رہا تھا۔

نمبر 2 یہ کہ سائل کے خلاف شکایت ہو کر بحوالہ لیٹر نمبری 98 مورخہ 18.06.2020 سپرنٹنڈنٹ صاحب آپ پولیس اپر سوات کے حضور سائل کی انکواری شروع کی گئی۔

نمبر 3 یہ کہ دوران انکواری چارج شیٹ نمبری 83/83-E مورخہ 03.06.2020 مجاریہ RPO صاحب متعلقہ گواہان اور سائل کے بیانات لئے گئے۔ اور متذکرہ گواہان نے سائل کے حق میں بیانات دیکر سائل کو متذکرہ انکواری میں بری الزمہ قرار دیا۔ جبکہ متذکرہ انکواری میں موصوف آفیسر نے سائل کے خلاف اپنے جانب سے تحریر کیا کہ ایک نامعلوم شخص نے سائل سے مبلغ 50000 ہزار روپے لیکر صرف 9000 ہزار روپے مدعی کو دیئے۔ اور بقایا رقم جیب میں رکھ دی ہے۔ جو کہ دریں سلسلہ کسی بھی گواہ یا متعلقہ شخص کے بارہ میں کوئی شے یا شہادت قلمبند نہیں ہوئی ہے۔ لہذا سائل کے خلاف انکواری ہو کر سائل کو رپورٹ کیا جا کر سائل کو ضلع اپر دیر تبدیل کر دیا گیا۔ اور سائل کے خلاف جانبدارانہ رویہ اختیار کر دیا گیا۔ اور سائل بوجوہات ذیل بے گناہ اور ناکردہ گناہ ہے۔

I یہ کہ سائل چوکی بارامہ میں بطور ASI تعینات رہ کر سائل نے تقریباً 50 عدد پرچہ جات منشیات کے خلاف کر کے سائل کو انعام /نقد رقم ادا کر دی گئی ہے۔ نیز سائل نے اپنی گشت اور سرکاری ڈیوٹی احسن طریقہ سے سر انجام دیکر کسی بھی مشتبہ شخص کو معاف نہیں کیا ہے۔ نیز سائل کے ہمراہ اپنی بال بچ بھی ہمراہ تھی۔ جو کہ سائل نے بعد فراغت اپنی گھر میں گزارا ہے۔

لہذا انکواری میں مندرجہ مسماۃ دلشاد، مسماۃ مومنہ کو نہ تو سائل جانتا ہے۔ اور نہ ہی مسماۃان مذکورہ گان کو سائل نہ تو جانتا ہے۔ اور نہ ہی کسی قسم کا تعلق ان کیساتھ موجود تھی۔ بلکہ انکواری آفیسر نے جھوٹ پر مبنی الزامات لگائے ہیں۔

II یہ کہ سائل کے خلاف اپنی وجوہات کے بناء پر سائل کو مورد الزام ٹھہرایا جا کر بحوالہ OB نمبر 99 مورخہ 25.06.2020 سائل کو اپنی عہدہ سے رپورٹ کر کے سائل کو ضلع اپر دیر ٹرانسفر کروایا گیا ہے۔

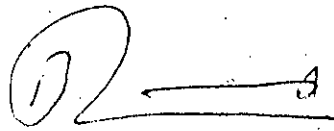
III یہ کہ چونکہ سائل ناکردہ گناہ بنے۔ اور سائل کو جھوٹے الزام میں رپورٹ کر دیا گیا۔

(21)

لہذا استدعا ہے۔ کہ سائل کے خلاف مندرجہ حکم منسوخ فرمائی جاوے اور سائل کو اپنی عہدہ (ASD) پر تعیناتی کا حکم صادر فرمائیں۔ نیز دیگر دادرسی بھی عنایت فرمائیں۔ سائل معہ اہل و عیال تاحیات دعا گورہیگا۔

العارض

مورخہ 08.07.2020



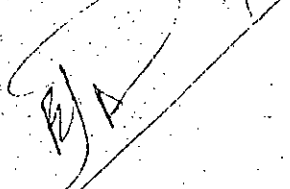
آپ کا تاج الحکم ہیڈ کنسٹیبل بہرائچ نمبر 4.1 متعینہ چوکی اغلام ضلع دیر بالا۔

سنا جی سر 3-022745-15505

034090 > 8648

Sir,

Forwarded, pl



SIC PS Wazir
8/7/20

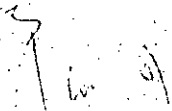
R/Sir

→ Applicant has been awarded a major punishment of suspension from ASI to HC by DPO Swat.

→ New applicant requests for restoration of his rank.

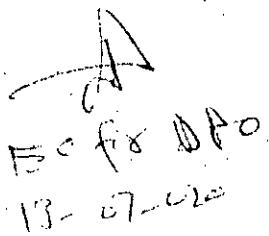
Sir,

Forwarded, pl



DSP/Wazir
08/07/2020

→ May forward her application to W/DPO Swat or otherwise, pl


FC for DPO
13-07-20

Aleslee



92

Anneame-E



**OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND**

SAIDU SHARIF SWAT.

Ph: 0946-9240381-88 & Fax No. 0946-9240390

Email: digmalakand@yahoo.com

ORDER:

This order will dispose off appeal of Head Constable Bahrul Mulk No. 41 of Dir Upper District for restoration of rank as ASI.

Brief facts of the case are that Charge Sheet / statement of allegation was issued to ASI Bahrul Mulk (the then Incharge Police Post Barama PS Mingora) by undersigned regarding his involvement in corrupt practices, besides his bad character had also been reported which showed his inefficiency and negligence in performing of his official duty. He was issued Charge Sheet / statement of allegation vide this office Endst: No. 4380-83/E, dated 03/06/2020 and SP Upper Swat was appointed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry and recorded statement of all concerned. The Enquiry Officer in his finding after thoroughly enquiry recommended the defaulter ASI for strict departmental punishment. This office returned the enquiry papers to DPO Office, Swat and ordered for awarding him exemplary punishment vide this office Memo: No. 503/E, dated 24/06/2020. Keeping in view the long service in the Police Force as well as poor family back ground of the delinquent Police Officer, the District Police Officer Swat being competent authority, in exercise of power vested in him under Rules 2 (iii) of Police disciplinary Rules -1975, awarded him a major Punishment of reversion to his substantive rank of Head Constable BPS-09 with immediate effect vide OB No. 99, dated 25/06/2020.

He was called in Orderly Room on 26/08/2020 and heard him in person. The appellant could not produce any substantial material in his defence. The appellant carries a corrupt reputation, famed for bribery. His service record shows that he had earned 1 major and 37 bad entries due to his ill reputation. Therefore, his appeal is filed.

Order announced.

Regional Police Officer,
Malakand Region, Saidu Sharif Swat
Signature

No. 7547 /E,
Date 01/09/2020

Copy of above for information and necessary action to District Police Officer, Dir Upper with reference to his office Memo: No. 3632/EB dated 30/07/2020. Service Roll, Fauji Missal & Enquiry file of the above named Officer are returned herewith for record in your office.

Encl: S. Book + S. Roll + F. Missal + Enquiry file.

A tested
9

OFFICE OF THE DPO
By: 5018
Date: 08-09-2020
UPPER DIR

OB/EC/OASI
For n action plz
W

OBND: 732
08-09-2020

APD/Dir (4)

کمر غائب السید فضل علی برائیس میں سرکٹوں کو ان مقام پر تیار

59

رجم درگوشی میں زر لگا علم

ضباب DIG کا سٹیشن ڈی

بڑی 7597 سٹیٹ سائبر

01-06-020

رجم انفورمیشن ضباب DIG کا سٹیشن

98 05B سے 25/020 کو کال رکھا گیا ہے

Handwritten signature and date 24/8

ضباب کے لئے تمام سائبر سٹیشن

1. لیگنڈ سائبر سٹیشن کے زیر نگرانی و سروس میں کھولنے کے لئے Asi کوئی کام

مجموعی طور پر سائبر سٹیشن کے تمام سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

2. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

3. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

4. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

5. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

6. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

7. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

8. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

9. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

10. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

11. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

12. لیگنڈ سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن کے لئے سائبر سٹیشن

1824

2/10/05

Handwritten signature

۱۔ یہ درجہ اولیٰ و ثانیہ کے ذریعہ اختیار کیا گیا ہے۔ اس کے بارے میں اطلاع
 جمع ہو کر کے کوئی نوٹ لکھ کر 25.6.20 سے قبل کوئی نوٹ لکھ کر کے لکھ کر اس کے لئے
 صاحب DIG کا نام لکھ کر اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس
 ڈیڑھ گھنٹے کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 OBA 732
 8.9.020

جو کہ اس کے لئے ہے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
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 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔

اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔

اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔

17/9/020

B

اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔
 اس کے لئے اس کے پاس جمع کروا دیا جائے۔ اس کے لئے اس کے پاس جمع کروا دیا جائے۔

A test

03409078648

B



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Annexure = 9

314/E
29-01-21
No. SI 299

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

/21, dated Peshawar the 22/ 1/2021.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Head Constable Bahrul Mulk No. 907/M (the then ASI). The petitioner was awarded penalty of reversion to substantive rank of Head Constable by District Police Officer, Swat vide OB No. 99, dated 25.06.2020 on the allegations that he while posted as Incharge Police Post Barama Police Station Mingora was involved in corrupt practices, besides his bad character has also been reported. His appeal was filed by Regional Police Officer, Malakand vide order Endst: No. 7547/E, dated 01.09.2020.

Meeting of the Appellate Board was held on 24.12.2020, wherein the petitioner was present and heard in detail.

Petitioner failed to advance any plausible explanation in rebuttal of the charges. Therefore, the Board decided that his petition is hereby rejected.

Sd/-
DR. ISHTIAQ AHMED, PSP/PPM
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI 230-39/21.

Copy of the above is forwarded to the:

1. Regional Police Officer, Malakand at Swat. One Service Roll and One Service Book containing 58 pages departmental enquiry file of the above named HC received vide your office Memo: No. 10806-07/E, dated 10.11.2020 is returned herewith for your office record.
2. District Police Officer, Swat.
3. District Police Officer, Dir Upper.
4. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
5. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
6. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
8. Office Supdt: E-III, CPO Peshawar.
9. Officer concerned.

OFFICE OF THE DPO
Dy: 648
Date 04/02/2021
UPPER DIR

No 1338
Dt 29-1-2021
Dir Upper

(RAI BABAR SAEED) PSP
Deputy Inspector General of Police, HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

End. S. Roll
S. Books
Enquiry file
Regional Police Officer,
Malakand Region,
Saidu Sharif, Swat.
22/1/2021

OB NO - 81

Dt 03.02.2021

A Test Test
Q

بعدالت جناب سروسز ٹریبونل KPK تمام ایسٹو بساں کے لیے کورٹ سوانہ

منجانب سائل / اپیلانٹ

2021

مورخہ 11 فروری

مقدمہ . . . کرملک . . . بنام حکومت بلالچہ محکمہ پولیس و عمرہ

دعویٰ Service Appeal

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنے طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام سوانہ کورٹ کے لیے محمد اویس صاحب اور وکیل سہیم کورٹ کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو رضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہیا و اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف اپیل کی برآمدگی اور منسوخ مذکور کے کھل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے

2021

ماہ فروری

المرقوم 11

العبد

گواہ شد

کرملک - ایڈوکیٹ فور
 cell: 0340-9078648
 cric = 15505-0227615-3

العبد

گواہ شد

العبد

Attested & Accepted by
 ایسٹو منظور ہے۔
 M. Javid Khem
 A.S.C
 0343 960 7492

مقام
 M. Javid Khem
 A.S.C
 0343 960 7492

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 2767 ²⁷⁶⁸ of 20 TB
21

Baharul Mulla ^{2 D. Officer}
Appellant/Petitioner

Versus

PPO, KPDC Pesh. RESPONDENT(S)

Notice to Appellant/Petitioner

Baharul Mulla S/o Nawaz ul ^{Hada}
R/o Bayna Post office
Choga Tehsil Purni Distt. Shangla

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal

on 23/8/202 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court Swat

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No.....*2767-2768*..... of 20

Babarul Malik & Others

Appellant/Petitioner

Versus

P.P.O, 10 P.M. Peshawar

RESPONDENT(S)

Notice to *Counsel* Appellant/Petitioner

Mohammad Fouad Khan

Advocate Supreme Court

of Pakistan office Swat

0313-9607492

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *23-8-2021* at *9:00 AM*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 27 of 2011

Babur Mulk Appellant/Petitioner

Versus

P.P.O. K.P.U. Pesh. Respondent

Respondent No. 2

Notice to:

Deputy Inspector General of Police/RPO,
Malakand Region at Swat

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 11/11/2011 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this 10/11/11

Day of Sep: 2011

at Camp Court Swat

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

13

No.

Appeal No. *2757* of 20²¹

Bakht Mulk Appellant/Petitioner

Versus

D.P. Jallo Pesh. Respondent

Respondent No. *3*

Notice to:

District Police Officer Smart at Gulbada Smart

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *11/2021* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

10/12

Day of.....*Sept*.....20²¹

at Camp Court Smart

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 2767 of 20 21

Baqir Mulla Appellant/Petitioner

Versus

PPD 10/11/21 Respondent

Respondent No. 5

Notice to: —

Provincial Police Officer, P.P. Pesh.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 11/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 10/11/21

Day of Sep. 20 21

Camp Court Swat

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.2767/2021

Bahrul Mulk S/O Noor Ul Huda R/O Bayna, Post Office Choga Tehsil Puran
District Shangla

----- (Appellant)

Versus

Provincial Police Office Khyber Pukhtunkhwa Peshawar & others.

----- (Respondents)

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District Police Officer, Swat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.2767/2021

Bahrul Mulk S/O Noor Ul Huda R/O Bayna, Post Office Choga Tehsil Puran
District Shangla

----- (Appellant)

Versus

Provincial Police Office Khyber Pukhtunkhwa Peshawar & others.

----- (Respondents)

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully shewith:

Preliminarily objection:-

1. That the service appeal is barred by law and limitation.
2. That the service appeal is not maintainable in its present form.
3. The instant appeal is bad due to mis-joinder and non-joinder of necessary parties.
4. That the appellant is estopped due to his own conduct.
5. That the appellant has concealed the material facts from this Honorable Tribunal.
6. That the appellant has got no cause of action and locus standi to prefer the instant appeal.
7. That the appellant has not come to this honorable Tribunal with clean hands.

FACTS

1. Para to the extent of employment in Police Department pertains to record. hence need no comments.
1. That the appellant performed his routine duty, his performance was not satisfactory and was remained involved in corrupt practices during his service.
2. As stated above, appellant has performed is routine duty and his performance was not up to the mark.
3. Pertain to record, hence needs no comments.
4. That the appellant while posted as Incharge Police Post Barama Police Station Mingora was found involved in corrupt practices and was reported to be a corrupt officer. Besides his corruption, the appellant was also of a bad character, keeping illicit relations with bad character women. On the said allegation, an enquiry was conducted against the appellant. The Enquiry Officer after conducting proper enquiry submitted his finding, wherein the allegations leveled against the appellant were proved beyond

any shadow of doubt, hence recommend him for departmental punishment. Enquiry report is enclosed as annexure "A". On the basis of recommendation of Enquiry Officer, the appellant was awarded punishment of reversion to his lower rank of Head Constable vide OB No.99 dated 25/06/2020.

5. Incorrect. Proper charge coupled with statement of allegation has been issued to the appellant, whereas, he has also submitted his written statement about the allegation leveled against him, meaning thereby that the appellant was well aware of the enquiry conducted against him.
6. That the statement of appellant was required for inquiry proceedings conducted against him wherein the allegations leveled against the appellant were proved.
7. As explained above.
8. As stated above, that the appellant was involved in corrupt practices and was also of bad moral character. The appellant has been reverted to his lower rank of Head Constable on the recommendation of Enquiry officer, who conducted proper departmental enquiry against the appellant.
9. That the appeal of the appellant was thoroughly examined the Regional Police Officer Malakand Region (respondent No.02) and filed the same accordingly as his service record showed that the appellant had earned 01 major and 37 bad entries in his service book.
10. As explained above at para No.10.
11. That Revision of the appellant found unsatisfactory by respondent No.01; hence the same was filed.
12. As explained above at para No.11.
2. That appeal of the appellant is liable to be dismissed on the following grounds.

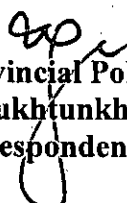
GROUNDS

- A. Incorrect. That the Orders of the respondents are legal, lawful and in accordance with law rules.
- B. Incorrect. That proper departmental inquiry has been conducted against the appellant wherein all the opportunities of self defense and personal hearing were provided to the appellant.

- C. Incorrect. That all the codal formalities have been fulfilled before awarding the major punishment to the appellant.
- D. Incorrect. As stated above, all the codal formalities have been fulfilled before awarding the major punishment to the appellant. No violation of the Police Rules 1975 has been made by the respondent.
- E. Incorrect. As stated above proper departmental inquiry was conducted against the appellant wherein all the opportunities of self defense and personal hearing were provided to the appellant. The inquiry officer after conducting inquiry submitted his finding wherein the allegations against him were proved beyond the shadow of doubt.
- F. That the respondents may also be allowed to raise additional grounds at the time of hearing.

PRAYER

In view of the above comments of answering respondents, it is prayed that instant appeal being badly barred by law and limitation may kindly be dismissed with cost.


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


Regional Police Officer,
Malakand Region
Said (Respondent No.2)


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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No.2767/2021

Bahrul Mulik S/O Noor Ul Huda R/O Bayna, Post Office Choga Tehsil Puran District
Shangla

----- (Appellant)

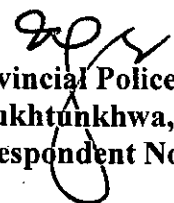
Versus


Provincial Police Office Khyber Pukhtunkhwa Peshawar & others.

----- (Respondents)

AFFIDAVIT

We, the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of our knowledge/ belief and nothing has been kept secret from the honorable Tribunal.


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


**Regional Police Officer,
Malakand Region
Saidu Sharif, Swat
(Respondent No.2)**


**District Police Officer, Swat.
(Respondent No.3)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No.2767/2021

Bahrul Mulk S/O Noor Ul Huda R/O Bayna, Post Office Choga Tehsil Puran District
Shangla

----- (Appellant)

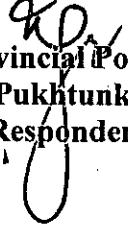
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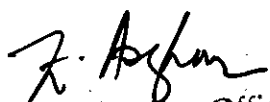
Provincial Police Office Khyber Pukhtunkhwa Peshawar & others.

----- (Respondents)

AUTHORITY LETTER

We, the above respondents do hereby authorize Mr. Naeem Hussain DSP/Legal Swat to appear before the Tribunal on our behalf and submit reply etc in connection with titled Service Appeal.


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


**Regional Police Officer,
Malakand Region,
Saidu Sharif, Swat
(Respondent No.2)**


**District Police Officer, Swat.
(Respondent No.3)**



ریڈار نمبر 98 مورخہ 18/06/2020

جناب ریجنل پولیس آفیسر ملاکنڈ رینج
عنوان :-
تفصیل انکوائری :-
انکوائسری رپورٹ آڈاں ASI بحرالملک

جناب عالی!

بحوالہ مشمولہ چارج شیٹ نمبری 83/E-4380 مورخہ 03/06/2020 مجاریہ جناب RPO صاحب ملاکنڈ رینج
تحریر خدمت ہوں کہ چارج شیٹ بالا میں انکوائری شروع کی گئی۔

دوران انکوائری ASI بحرالملک کو طلب کر کے ذہانی سنا گیا اور مذکورہ کا بیان قلمبند کر کے شامل کاروائی ہے۔
دوران انکوائری (1) دیدار غنی خان SDPO سٹی سرکل (2) محمد انور خان INSP/SHO تھانہ بیگورہ (3) محمد رحیم خان
INSP/OII تھانہ بیگورہ (4) بخت شیردان خان SI انچارج DSB سوات کے بیانات قلمبند کر کے جنہوں نے ASI بحرالملک کے حق
میں بیانات دیکر بیان کیا کہ ASI مذکورہ نے ایمانداری سے اپنی ڈیوٹی سرانجام دی ہے۔
انکوائری ہذا کے سلسلے میں علاقہ بارامائیل خفیہ معلومات کر کے ASI مذکورہ نے دوران تعیناتی علاقہ میں فحاش عورتوں (1) مسماہ
دلشاد سکنہ قونج دہہ باراما (2) مسماہ مومنہ سکنہ گلی منیر کبازی حاجی بابا کے ساتھ تعلقات استوار کئے تھے اور مذکورہ ASI کئی بار وہاں پر دیکھا گیا
ہے۔

دوران انکوائری مزید معلوم ہوا کہ کسی سید محمد اسحاق ولد رحیم گل ساکن ملوک آباد بیگورہ سے بکریاں چوری ہوئی
تھی۔ ASI بحرالملک نے چوری شدہ بکریوں کے ملزمان کو معلوم کر کے ملزم فریق سے 50 ہزار روپے لیکر مدعی فریق کو صرف 9 ہزار روپے پر
مطمئن کر کے باقی رقم جیب خود میں رکھی اور معاملہ ختم کیا۔

دوران تعیناتی ASI مذکورہ بحوالہ OB نمبر 64 مورخہ 23/04/2020 کو سپینڈ ہو کر پولیس لائن کلوز کیا گیا تھا۔ مذکورہ
دوبارہ بحال ہو کر چوکی بارامائیل تعینات کیا گیا تھا۔

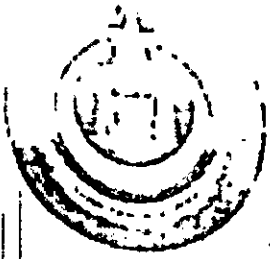
نتیجہ انکوائری :-

بعد ازاں انکوائری و تفصیلی معلومات پایا گیا۔ کہ مذکورہ ASI بحرالملک کا دوران تعیناتی مختلف اضلاع سے بغیر پیریڈ مکمل کئے تبدیل
کیا گیا ہے۔ جس کی تفصیل ذیل ہے۔ مورخہ 15/10/2014 ضلع شانگلہ سے ضلع دیراپر، مورخہ 26/06/2015 ضلع دیراپر سے ضلع
بونیر، مورخہ 09/10/2017 کو ضلع بونیر سے ضلع شانگلہ، مورخہ 17/01/2018 کو ضلع شانگلہ سے ضلع سوات تبدیل کیا گیا۔ اس
عرصہ تعیناتی میں ASI بحرالملک کو کئی بار چارج شیٹ ہائے مل چکے ہیں اور دو (2) بار سپینڈ بھی ہو چکا ہے۔ مزید یہ کہ ASI مذکورہ ایک
کریٹ پولیس آفیسر ہے جس نے دوران تعیناتی چوکی بارامائیل میں فحاش و بدنام زمانہ عورتوں کے ساتھ تعلقات قائم کئے ہوئے تھے اور معمولی قسم
کے معاملات میں بھی لوگوں سے پیسے لیا کرتا تھا۔ جس لیے یہ بات عیاں ہے کہ مذکورہ ASI محکمہ پولیس کیلئے بدنامی کا سبب بن رہا ہے مذکورہ
ASI بحرالملک کے خلاف سخت حکمانہ کارروائی کی سفارش کی جاتی ہے۔

سپرٹنڈنٹ آف پولیس
اپر سوات

ATTESTED

Deputy Superintendent of Police Legal
Swat.



**OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND**

SAIDU SHARIF SWAT.

Ph: 0940-9240181-88 & Fax No. 0940-9240190

Email: dtgmalakand@yahoo.com

CHARGE SHEET

I, **MUHAMMAD LAZ KHAN**, Regional Police Officer, Malakand as competent authority, hereby charge you **ASI Baharul Mulk No. 907/01 of Police Station Baramu, District Swat** as follows:-

1. That you while posted as Incharge PS Baram District Swat, have been reported involved in corruption. Besides your bad characters have also been reported. Which show your inefficiency and negligence in performing of your official duty. Being a Police Officer yours such like characters / reputation is against the norms of Police and negatively affected the discipline of other personnel of the Force.

2. By reason of above, you appear to be guilty of misconduct, inefficiency and negligence from duty have rendered yourself liable to all or any of the penalties specified in Rule-4 of the disciplinary Rules, 1975.

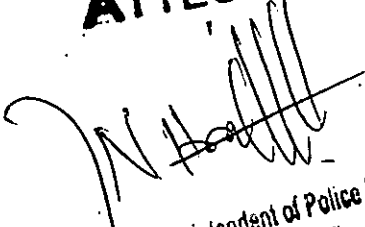
3. You are, therefore, required to submit your written reply within 7-days of the receipt of this charge sheet to the enquiry Officer.


4. Your written reply, 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 in that case ex-parte action shall follow against you.

5. Intimate as to whether you desire to be heard in person or not?

6. A Statement of Allegation is enclosed.

ATTESTED


Deputy Superintendent of Police Legal
Swat.


Regional Police Officer,
Malakand, at Saidu Sharif Swat
Naqi



OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND

SAIDU SHARIF SWAT.

Ph: 0946-9240181-88 & Fax No. 0946-9240190

Email: diemalakand@yahoo.com

DISCIPLINARY ACTION

I, MUHAMMAD LAZ KHAN, Regional Police Officer, Malakand at Saidu Sharif, Swat as competent authority, am of the opinion that ASI Bahrul Mulk No. 907/M while posted as Incharge PS Barama District Swat have rendered himself liable to be proceeded against departmentally as he has committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

That he while posted as Incharge PS Barama District Swat, has been reported involved in corruption. Besides his bad characters have also been reported, which show his inefficiency and negligence in performing of his official duty. Being a Police Officer his such like characters / reputation is against the norms of Police and negatively affected the discipline of other personnel of the Force.

2. For the purpose of scrutinizing the conduct of said officer with reference to the above allegations SP/upper Swat appointed as Enquiry Officer.
3. 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 officer, record its findings and make within fifteen (15) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.
4. The accused officer shall join the proceeding on the date, time and place fixed by the Enquiry officer.

Regional Police Officer,
Malakand, at Saidu Sharif Swat
Naqi*

No 4380-83 /E, dated Saidu Sharif the dated 03/06 2020.

Copy for information and necessary action to the:-

1. Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. SP/upper Swat / Enquiry Officer for initiating proper departmental proceeding against the accused Officer under Police Rules 1975.
3. District Police Officer, Swat.

ASI Bahrul Mulk No. 907/M Incharge PS Barama District Swat.

ATTESTED

Deputy Superintendent of Police Legal
Swat

ORDER

This order pertains to the Charge Sheet/Summary of Allegations issued to ASI Bahrul Mulk No.907/M the then Incharge Police Post Barama PS Mingora by Regional Police Officer Malakand Region at Saidu Sharif Swat (Now Dir Upper District) regarding his involvement in corrupt practices, besides his bad character has also been reported which shows his in-efficiency and negligence in performing of his official duty.

He was issued charge sheet statement of allegations by the Regional Police Officer vide his Office Endst. No.4380-83/E, dated 03-06-2020 and Mr. Farman Ullah Khan Superintendent of Police Upper Swat was appointed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry recorded statements of all concerned. The Enquiry Officer in his finding after thoroughly enquiry recommended the defaulter ASI for strict departmental punishment. The Regional Police Officer returned the enquiry papers to this office and ordered to be award him an exemplary punishment vide Region Office Swat Memo: No.5038/E, dated 24-06-2020.

Keeping in view the long service in the Police Force as well as poor family back ground of the delinquent Police Officer, I, QASIM ALI KHAN, PSP, District Police Officer, Swat being competent authority, in exercise of power vested in the undersigned under Rules 2 (iii) of Police Disciplinary Rules - 1975, awarded him a major punishment of reverted to his substantive rank of Head Constable (BPS-09) with immediate effect.

Order announced.

District Police Officer
Swat

O.B. No. 99

Dated: 25.6.2020 No 11012-1E dt. 26-6-2020

Copy to the:-

1. Regional Police Officer Malakand Region at Saidu Sharif Swat
2. District Police Officer Dir Upper, alongwith complete enquiry file containing 61 pages for necessary entry in his Service record and placing at his Fuji Missal.
3. Establishment Clerk

For necessary action, please.

ATTESTED

Deputy Superintendent of Police Legh
Swat.

محضور جناب ڈی آئی جی صاحب ملاکنڈ ریجن بمقام سید و شریف سوات۔

اپیل بمراد بحالی سائل ہیڈ کنسٹیبل بحر الملک جو کہ بحوالہ حکم OB نمبر 99 مورخہ

25.06.2020 بحکم DPO صاحب ضلع سوات رپورٹ کیا گیا ہے۔ حالانکہ سائل بے گناہ ہے۔

جناب عالی!

گزارش منجانب سائل حسب ذیل ہے۔

نمبر 1 یہ کہ سائل بحیثیت ASI پولیس چوکی بارامہ (تھانہ مینگورہ) میں تعینات تھا۔ جبکہ سائل کے ہمراہ تھانہ مینگورہ چوکی بارامہ میں تعیناتی کے دوران اپنی ہال بچ ہمراہ تھی۔ اور سائل احسن طریقہ سے ڈیوٹی سرانجام دے رہا تھا۔

نمبر 2 یہ کہ سائل کے خلاف شکایت ہو کر بحوالہ لیٹر نمبری 98 مورخہ 18.06.2020 سپرنٹنڈنٹ صاحب آپ پولیس پر سوات کے حضور سائل کی انکوائری شروع کی گئی۔

نمبر 3 یہ کہ دوران انکوائری چارج شیٹ نمبری 4380-83/E مورخہ 03.06.2020 بحالیہ RPO صاحب متعلقہ گواہان اور سائل کے بیانات لئے گئے۔ اور متذکرہ گواہان نے سائل کے حق میں بیانات دیکر سائل کو متذکرہ انکوائری میں بری الزمہ قرار دیا۔ جبکہ متذکرہ انکوائری میں موصوف آفیسر نے سائل کے خلاف اپنے جانب سے تحریر کیا کہ ایک نامعلوم شخص نے سائل سے مبلغ 50000 ہزار روپے لیکر صرف 9000 ہزار روپے مدعی کو دیئے۔ اور بقایا رقم جیب میں رکھ دی ہے۔ جو کہ دریں سلسلہ کسی بھی گواہ یا متعلقہ شخص کے بارہ میں کوئی شے یا شہادت قلمبند نہیں ہوئی ہے۔ لہذا سائل کے خلاف انکوائری ہو کر سائل کو رپورٹ کیا جا کر سائل کو ضلع اپر ڈیر تبدیل کر دیا گیا۔ اور سائل کے خلاف جانبدارانہ رویہ اختیار کر دیا گیا۔ اور سائل بوجوہات ذیل بے گناہ اور ناکردہ گناہ ہے۔

یہ کہ سائل چوکی بارامہ میں بطور ASI تعینات رہ کر سائل نے تقریباً 50 عدد پرچہ جات منشیات کے خلاف کر کے سائل کو انعام / نقد رقم ادا کر دی گئی ہے۔ نیز سائل نے اپنی گشت اور سرکاری ڈیوٹی احسن طریقہ سے سرانجام دیکر کسی بھی مشتبہ شخص کو معاف نہیں کیا ہے۔ نیز سائل کے ہمراہ اپنی ہال بچ بھی ہمراہ تھی۔ جو کہ سائل نے بعد فراغت اپنی گھر میں گزارا ہے۔

لہذا انکوائری میں مندرجہ مسماۃ دلشاد، مسماۃ مومنہ کو نہ تو سائل جانتا ہے۔ اور نہ ہی مسماۃان مذکورہ گان کو سائل نہ تو جانتا ہے۔ اور نہ ہی کسی قسم کا تعلق ان کیساتھ موجود تھی۔ بلکہ انکوائری آفیسر نے جھوٹ پر مبنی الزامات لگائے ہیں۔

یہ کہ سائل کے خلاف اپنی وجوہات کے بناء پر سائل کو مورد الزام ٹھہرایا جا کر بحوالہ OB نمبر 99

مورخہ 25.06.2020 سائل کو اپنی غمخوار سے رپورٹ کر کے سائل کو ضلع اپر ڈیر ٹرانسفر کر دیا گیا ہے۔

یہ کہ چونکہ سائل ناکردہ گناہ ہے۔ اور سائل کو جھوٹے الزام میں رپورٹ کر دیا گیا۔

ATTESTED

(Signature)

Deputy Superintendent of Police
Sوات

(21)

لہذا استدعا ہے۔ کہ سرائل کے خلاف مندرجہ حکم منسوخ فرمائی جاوے اور سرائل کو اپنی عہدہ (ASI) پر تعیناتی کا حکم صادر فرمادیں۔ نیز دیگر ادارہ سی بھی عنایت فرمادیں۔ سائل معذرتوں و عیال تاحیات دعا گو رہیگا۔

العارض

مورخہ 08.07.2020

آپکا نام احکام ہیڈ کنسٹیبل بہر الملک نمبر 41 متعینہ چوکی انگرام ضلع دیر بالا۔

نسبہ حقہ نمبر 3-0227615-05505

0349090 > 8648

ATTESTED

Deputy Superintendent of Police Legat Swat

Sir,

Forwarded

S.H.C. P.S. Wazir
8/7/20

N/Sir

Applicant has been

major punishment of deduction from

ASI to I.C. by DPO Swat.

→ New appointment requests for
restoration of his rank.

Sir,

Forwarded, pl

DSP Wazir
08/07/20

may forward his application to

with present in the office, pl

DPO
13/7/20

(92)



**OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND**

SAIDU SHARIF SWAT.

Ph: 0946-9240381-88 & Fax No. 0946-9240390

Email: digmalakand@yahoo.com

ORDER:

This order will dispose off appeal of Head Constable Bahrul Muik No. 41 of District Upper District for restoration of rank as ASI.

Brief facts of the case are that Charge Sheet / statement of allegation was issued to ASI Bahrul Muik (the then Incharge Police Post Barama PS Mingora) by undersigned regarding his involvement in corrupt practices, besides his bad character had also been reported which showed his inefficiency and negligence in performing of his official duty. He was issued Charge Sheet / statement of allegation vide this office Endst: No. 4380-23/E, dated 03/06/2020 and SP Upper Swat was appointed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry and recorded statement of all concerned. The Enquiry Officer in his finding after thoroughly enquiry recommended the defaulter ASI for strict departmental punishment. This office returned the enquiry papers to DPO Office, Swat and ordered for awarding him exemplary punishment vide this office Memo: No. 503/E, dated 24/06/2020. Keeping in view the long service in the Police Force as well as poor family back ground of the delinquent Police Officer, the District Police Officer Swat being competent authority, in exercise of powers vested in him under Rules 2 (iii) of Police disciplinary Rules -1975, awarded him a major Punishment of reversion to his substantive rank of Head Constable BPS-09 with immediate effect vide OB No. 99, dated 25/06/2020.

He was called in Orderly Room on 26/08/2020 and heard him in person. The appellant could not produce any substantial material in his defence. The appellant carries a corrupt reputation, famed for bribery. His service record shows that he had earned 1 major and 37 bad entries due to his ill reputation. Therefore, his appeal is filed.

Order announced.

Regional Police Officer,
Malakand Region, Saidu Sharif Swat.
*Muqim

No. 9547 /E,
01/09/2020

ATTESTED

Deputy Superintendent of Police Legar Swat

Copy of above for information and necessary action to District Police Officer Upper with reference to his office Memo: No. 3632/EB dated 30/07/2020. Service Roll, Enquiry file of the above named Officer are returned herewith for record in your office.

Encl: S. Book + S. Roll + F. Missal + Enquiry file

OFFICE OF THE DPO
Dy: 5018
Date 08-09-2020
UPPER DIR

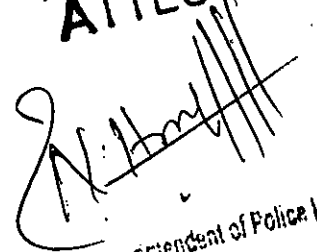
OB/EC/AS1
for n/ action plz
[Signature]

OBND: 732
08-09-2020

DPO/District

درخواست گزار کی درخواست کے ذریعے اعتراض کی رقم ۵۰ لاکھ ہے
 قبضہ سہولت کے گورنر گورنر کے ۶۶ سہولت کو زبردستی کے لئے لکھن سہولت کے
 25.6.20
 قبضہ DIG کا حلیہ سربراہ سپر سٹریٹ سہولت کو نہیں دیکھ کر
 ڈی ایچ او نے لکھی سہولت کی ریس یا منظور کرنے کو لازم دہی 08.9.20 OBA 16732
 رقم دی ہے

جو تک سہولت بنا ہے۔ اور سہولت کے سہولت کا لکھا ہے
 نہیں لکھا ہے جس سہولت کے لئے لکھی گئی ہے
 اور نہ ہی اس کے لئے سہولت کے اہلکار تعلق اور سہولت
 زبردستی کے ذریعے سہولت کے لئے لکھی گئی ہے
 سہولت کے لئے لکھی گئی ہے جس سہولت کے لئے لکھی گئی ہے

ATTESTED

 Deputy Superintendent of Police Legh Swat.

یہ سہولت کے لئے سہولت کے ذریعے لکھی گئی ہے
 اور سہولت کے لئے لکھی گئی ہے جس سہولت کے لئے لکھی گئی ہے
 اور سہولت کے لئے لکھی گئی ہے جس سہولت کے لئے لکھی گئی ہے

سربراہ سپر سٹریٹ سہولت کے لئے لکھی گئی ہے
 رقم ۵۰ لاکھ ہے
 سربراہ سپر سٹریٹ سہولت کے لئے لکھی گئی ہے
 رقم ۵۰ لاکھ ہے

17/9/20
 (B)
 سربراہ سپر سٹریٹ سہولت کے لئے لکھی گئی ہے
 رقم ۵۰ لاکھ ہے

03409078648



25

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

3/4/E
29.11.21

No. SI

299

/21, dated Peshawar the 22/ 9/2021.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Head Constable Bahrul Mulk No. 907/M (the then ASI). The petitioner was awarded penalty of reversion to substantive rank of Head Constable by District Police Officer, Swat vide OB No. 99, dated 25.06.2020 on the allegations that he while posted as Incharge Police Post Barama Police Station Mingora was involved in corrupt practices, besides his bad character has also been reported. His appeal was filed by Regional Police Officer, Malakand vide order Endst: No. 7547/E, dated 01.09.2020.

Meeting of the Appellate Board was held on 24.12.2020, wherein the petitioner was present and heard in detail.

Petitioner failed to advance any plausible explanation in rebuttal of the charges. Therefore, the Board decided that his petition is hereby rejected.

ATTESTED

Sd/-

DR. ISHTIAQ AHMED, PSP/PPM
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar

Deputy Superintendent of Police Legal
Swat.

No. SI 230-39/21.

Copy of the above is forwarded to the:

1. Regional Police Officer, Malakand at Swat. One Service Roll and One Service Book containing 58 pages departmental enquiry file of the above named HC received vide your office Memo: No. 10806-07/E, dated 10.11.2020 is returned herewith for your office record.
2. District Police Officer, Swat.
3. District Police Officer, Dir Upper.
4. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
5. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
6. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
8. Office Supdt: E-III, CPO Peshawar.
9. Officer concerned.

OFFICE OF THE DPO
By: 648
Date 04/02/2021
UPPER DIR

No 1338
Dt 29-1-2021
Dir Upper

(RAI BABAR SAEED) PSP
Deputy Inspector General of Police, HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Encl. S. Roll
S. Book
original
Encl. file
Regional Police Officer,
Malakand Region,
Sandu Sharif, Swat.
22/9/21

OB No - 81

dt. 03.02.2021