

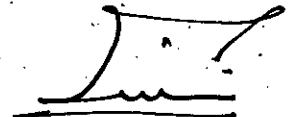
06.10.2022

Learned counsel for the appellant present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents present.

After hearing arguments at certain length, it transpired that complete record of inquiry file has not been submitted by the respondents, therefore, representative of the respondents is directed to produce the same on the next date and to come up for arguments on 10.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)  
Member (J)  
Camp Court Swat



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

04.07.2022

Appellant alongwith counsel present. Mr. Noor Zaman, District Attorney and Ghani Rehman, S.I for official respondents present. Written reply on behalf of official respondents already been submitted.

On previous date notices were issued through registered post to private respondent No. 4 & 5, but today no one present on behalf of private respondents therefore, proceeded as ex-parte. To come up for rejoinder/arguments on 03.08.2022 before D.B at camp court, Swat.



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

3.8.22

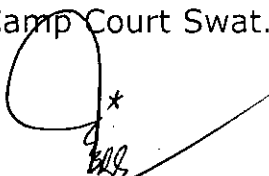
*Due to same reason vacation the case is adjourned to 7-9-22 for the same.*



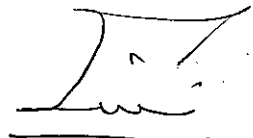
07.09.2022

Learned counsel for the appellant present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Riaz Khan Paidakhel, Assistant Advocate General for official respondents No. 1 to 3 present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. 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


07.04.2022

Nemo for the appellant. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Noor Zaman Khattak, District Attorney for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 & 5.

Joint Para-wise comments on behalf of official respondents No. 1 to 3 submitted, which are placed on file.

Previous date was changed on Reader Note, therefore, notices be issued to private respondents No. 4 & 5 for submission of written reply/comments for 07.06.2022 before the S.B at Camp Court Swat.

Notice also be issued to appellant/counsel for the appellant through registered post for the date fixed.



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

7<sup>th</sup> June, 2022

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG for official respondent present.

Learned counsels are on strike. To come up for written reply/comments of private respondent No.4 and 5 on 04.07.2022 before the S.B at camp court Swat.

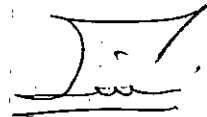


(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

03.01.2022

Appellant in person present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 3 present and sought further time for submission of written reply/comments.

Appellant submitted correct address of private respondents No. 4 & 5. Office is directed to make necessary entry in the relevant register as well as in the memorandum of appeal, thereafter notices be issued to the said respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 10.02.2022 before the S.B at Camp Court Swat.



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

10.02.2022

Tour is hereby canceled .Therefore, the case is adjourned to 07.04.2022 for the same as before at Camp Court Swat.



Reader

02.11.2021

Appellant alongwith his counsel present. Mr. Riaz Khan Paindakheil, Assistant Advocate General for the respondents present.

Written reply/comments on behalf of respondents not submitted. Learned Assistant Advocate General is required to contact the respondents for submission of reply/comments. To come up for reply/comments before the S.B on 06.12.2021 at Camp Court Swat.



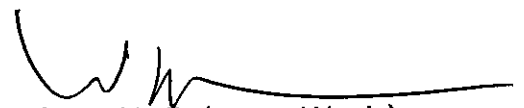
(Atiq-Ur-Rehman Wazir)  
Member (Executive)  
Camp Court, Swat

06.12.2021

Appellant in person present.

Mr. Muhammad Rasheed, Deputy District Attorney alongwith Mr. Hikmat Khan Constable for respondents present.

Reply/comments on behalf of respondents are still awaited. Representative of respondents requested for time to submit reply/comments; allowed. Appellant is also directed to provide correct addresses of private respondents No. 4 & 5 on the next date. To come up for reply/comments on 03.01.2022 before S.B at Cam Court, Swat.



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

05/04/2021

Due to COVID-19, the case is adjourned to  
07/06/2021 for the same.

  
READER

26.07.2021

To come up for preliminary hearing on 24.08.2021  
before S.B at Camp Court, Swat. Notices be issued to  
appellant/counsel for the date fixed.


  
Chairman

24.08.2021


Nemo for the appellant.

The appeal was preferred on 25.11.2019 and is still lying in  
the channel for preliminary hearing. If the appeal is dismissed in  
default and then an application is made for restoration, it will  
cause further delay and result into aging of the appeal.  
Therefore, it is deemed appropriate to admit the appeal for  
regular hearing in absence of appellant subject to all just and  
legal objections including that of limitation to be determined  
during the course of full hearing. However, appellant and his  
counsel be put on notice for deposit of security and process fee  
within 20 days. Thereafter, notices be issued to the respondents  
for submission of written reply/comments on 02.11.2021 before  
S.B at camp court, Swat.

  
Chairman  
Camp Court, Swat.

  
Appellate Deposited  
Security of Process Fee

Due to corona viruses tour to  
Camp Court Swat has been cancelled.  
To come up for the same on 04.06.20

  
Reader





03.06.2020 Due to COVID-19, the case is adjourned. To come up  
for the same on 05.08.2020, at camp court Swat.

  
Reader

## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1584/2019 \_\_\_\_\_

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 25/11/2019                | <p>The appeal of Mr. Kamran presented today by Mr. Shabir Ahmad 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;"><br/>REGISTRAR 25/11/19</p>  |
| 2-    | 09.01.2020                | <p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>09-01-2020</u></p> <p style="text-align: right;"><br/>CHAIRMAN</p>  |
|       | 05.03.2020                | <p>Appellant in person present and requested for adjournment on the ground that his counsel is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 05.03.2020 for preliminary hearing before S.B at Camp Court Swat.</p> <p style="text-align: right;"><br/>(Muhammad Amir Khan Kundi)<br/>Member<br/>Camp Court Swat</p> |
|       |                           | <p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 09.04.2020 before S.B at Camp Court, Swat.</p> <p style="text-align: right;"><br/>Member<br/>Camp Court, Swat.</p>   |



BEFORE KHYBER PAKHTUNKHWAH SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No. 1584 of 2019

Kamran

.....Appellant

Vs

Provincial Police Officer Khyber Pakhtunkhwa at Peshawar and others

.....Respondents

SERVICE APPEAL

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| S.No. | Descriptions  | Annexure     | Page No. |
|-------|---|--------------|----------|
| 1.    | Memo of Appeal  |              |          |
| 2.    | Affidavit   |              | 1-5      |
| 3.    | Memo of Addresses   |              | 6        |
| 4.    | Copy of FIR along with better copy of FIR   | "A"          | 7<br>8-9 |
| 5.    | Copies of charge sheet, finding report and dismissal order dated 03/07/2019                             | "B, C & D"   | 10-14    |
| 6.    | Copy of departmental appeal along with better copy and order of respondent No. 2 dated 04/11/2019       | "E, F"       | 15-20    |
| 7.    | Order of ASJ-II, Swat, Statement of respondent No. 4, compromise deed and affidavit of respondent No. 5 | "G, H, I, J" | 21-25    |
| 7.    | Wakalat Nama  |              | 26       |

Appellant

Through Counsel

*Shabir Ahmad Khan*  
Shabir Ahmad Khan  
Advocate, High Court  
Office Address: Hamza Law Chamber,  
Dubai Plaza,  
Near Azad Medicine Company  
Dakhana Road, Mingora, Swat  
Cell No. 0341-5666363

(1)

**BEFORE KHYBER PAKHTUNKHWAH SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. 1584 of 2019

Kamran S/o Qasim R/o Manyar, Tehsil Barikot, District  
Swat Ex. Constable Belt No. 3108

...Appellant

VERSUS

1. Provincial Police Officer Khyber Pakhtunkhwa at CPO  
Peshawar
2. Regional Police Officer Malakand R-III at Saidu Sharif,  
District Swat
3. District Police Officer Swat
4. Habib Ur Rehman S/o Adalat Khan R/o Manyar, District  
Swat
5. Mst. Razya wife of Habib Ur Rehman R/o Manyar, District  
Swat

.....Respondents

SERVICE APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT,  
1974 AGAINST THE IMPUGNED ORDER OF RESPONDENT NO.  
3 DATED 03/07/2019, WHEREBY THE APPELLANT WAS  
DISMISSED FROM SERVICE. THE APPELLANT PREFERRED  
DEPARTMENTAL APPEAL TO RESPONDENT NO. 2 BUT THE  
SAME WAS FILED ON 04/11/2019.

PRAYER:

BY ACCEPTANCE OF THE INSTANT SERVICE APPEAL,  
THE IMPUGNED ORDER OF RESPONDENTS No. 1&2 MAY  
KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY

2

BE REINSTATED INTO SERVICE ALONG WITH BACK BENEFITS.

---

Respectfully Sheweth:

Facts arising to the present appeal are as under;

- 1) That appellant was initially recruited in police Department as Police Constable.
- 2) That the respondent No. 4 lodged a false and baseless FIR against the appellant and on the basis which, the respondent No. 3 suspended the appellant and closed to police line Swat. (Copy of FIR along with better copy of FIR is attached herewith as annexure "A")
- 3) That the respondent No.3 issued charge sheet to the appellant and entrusted the enquiry to SP Investigation, Swat after conducting enquiry, the enquiry officer submitted his finding report, on the recommendations of which the appellant was dismissed from service. (Copies of charge sheet, finding report and Dismissal order dated 03/07/2019 are attached herewith as annexure "B, C" & "D" respectively)
- 4) That the impugned order was communicated to the appellant on 16/08/2019. Aggrieved from the order of respondent No.3, the appellant preferred departmental to respondent No. 2, but the same was filed by respondent No.2 on 04/11/2019, Hence, the instant service appeal.

(Copies of departmental appeal along with better copy and order of respondent No. 2 dated 04/11/2019 are attached herewith as annexure "E, F" respectively)

GROUNDS: -

- i. That the enquiry ran a one way traffic and on the recommendations of enquiry officer / respondent No. 3 illegally and unlawfully dismissed the appellant from service. No proper opportunity of being fairly heard was given to the appellant.
- ii. That the respondent No. 3 made a sole ground for dismissal the FIR lodged against the appellant, but it is pertinent to mention here that in the said FIR, the BBA of appellant has been confirmed by the learned ASJ-II Swat as the complainant himself came to the court and recorded his statement and as well as affected a compromise deed with the appellant stating that the appellant was charged merely on the basis of suspicion and that he has no objection over the confirmation of BBA and on the acquittal of the appellant as the complainant realized the appellant to be innocent. This clarifies the factual scenario and holds the innocence of the appellant visible and apparent. (Copies of order of

ASJ-II, Swat statement of respondent No. 4, compromise deed are attached herewith as annexures "G,H,I" respectively)


- iii. That beside this, the respondent No. 5 also gave an affidavit, which further shows the innocence of the appellant. (Copy of the affidavit is attached herewith as annexure "J")
- iv. That the appellant was not heard properly and no weightage was given to his stance in defence neither was it deemed necessary by the respondents which totally violates every corner of justice that prevails.
- v. That the appellant was not treated in accordance with law and rules on the subject and the impugned order has been passed in flagrant violation of law and rules tainted with mala-fide intention and is therefore not sustainable and is liable to be set aside.
- vi. That the universal cannon of natural justice have been set aside and no ample opportunity of presenting the delinquent stance / version has been given.
- vii. That the impugned order is unreasonable, arbitrary and is liable to be set aside.

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viii. That other important points will be raised during the course of arguments with prior permission of this Honorable Tribunal.

Therefore, it is humbly prayed that by the acceptance of this service appeal, the impugned order of respondents Nos. 1&2 may kindly be set aside and the appellant may kindly be reinstated into service along with back benefits.

Any other relief as deemed appropriate in the circumstances of the case and not specifically prayed for may also be granted to appellant.

  
Appellant  
Kamran Ex. Constable Belt No. 3108

Through Counsel

  
Shabir Ahmed Khan (Dawlat Khail)  
Advocate, High Court

Dated: 23/11/2019

6

**BEFORE KHYBER PAKHTUNKHWAH SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2019

Kamran

Vs

Provincial Police Officer Khyber Pakhtunkhwa at CPO Peshawar and  
others

SERVICE APPEAL

MEMO ADDRESSES

ADDRESS OF THE APPELLANT:


Kamran S/o Qasim R/o Manyar, Tehsil Barikot, District Swat

CNIC No. 15602-4595291-5

Cell No. 0340 9412239

ADDRESSES OF THE RESPONDENTS:

1. Provincial Police Officer Khyber Pakhtunkhwa at CPO  
Peshawar
2. Regional Police Officer Malakand R-III at Saidu Sharif,  
District Swat
3. District Police Officer Swat
4. Habib Ur Rehman S/o Adalat Khan R/o Manyar, District  
Swat
5. Mst. Razya wife of Habib Ur Rehman R/o Manyar, District  
Swat

  
Appellant

Through Counsel

  
Shabir Ahmad Khan

Advocate, High Court

7

BEFORE KHYBER PAKHTUNKHWAH SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No. \_\_\_\_\_ of 2019

Kamran

Vs

Provincial Police Officer Khyber Pakhtunkhwa at CPO Peshawar and  
others

SERVICE APPEAL

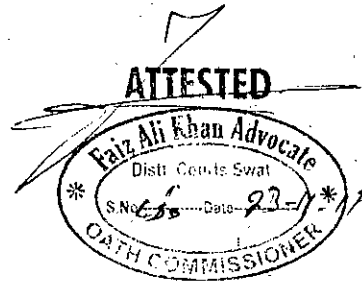
Affidavit

I Kamran S/o Qasim R/o Manyar, Tehsil Babozai, District Swat Ex.  
Constable Belt No. 3108, do hereby states on oath that all the contents of  
this Service appeal are correct and true to the best of my belief and  
knowledge and nothing has been concealed from this Honorable  
Tribunal.



Deponent

Kamran







## ابتدائی اطلاع رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردفعہ ۱۵۴ مجموعہ ضابطہ فوجداری

ضلع: سوات

تھانہ: رحیم آباد

تاریخ: 23/05/2019 بوقت 16:00 بجے

F.I.R نمبر: 428

|   |  |   |
|---|--|---|
| 1 | تاریخ و وقت رپورٹ  | 23/05/2019 بوقت 16:00 بجے                                     |
| 2 | نام و سکونت اطلاع دہندہ مستغیث   | حبیب الرحمن ولد عدالت خان سکندہ مانیار، ضلع سوات              |
|   | CNIC No. 15602-2471623-5   | 0349-9627451  |
|   | مختصر کیفیت جرم (معد دفعہ) حال اگر کچھ لیا گیا ہو۔                                   | 496-A ت-پ   |
| 4 | جائے وقوعہ فاصلہ تھانہ سے اور سمت  | مکان ازاں مستغیث حبیب الرحمن واقع لالاگان، تیندوڈاگ، ضلع سوات |
| 5 | نام و سکونت ملزم   | کامران ولد قاسم سکندہ مانیار، ضلع سوات                        |
| 6 | کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو | مدعی کے رپورٹ پر مقدمہ ہذا قائم کیا گیا۔                      |
| 7 | تھانہ سے رواگئی کی تاریخ و وقت   | بہ سبیل ڈاگ   |

## ابتدائی اطلاع نیچے درج کرو۔ مستغیث مندرجہ خانہ بالا نے تھانہ آ کر یوں

رپورٹ کرتا ہے کہ مسماۃ رضیہ دختر مارا گل سکندہ فالیگے کیساتھ عرصہ 10/11 سال قبل میری شادی بشریت محمدی ہو کر جس سے چار بچے پیدا ہو کر زندہ موجود ہیں۔ عرصہ تین ماہ قبل دیہہ خود مانیار سے ترک سکونت کر کے دیہہ تیندوڈاگ میں کرایہ کے مکان لیکر بیوی بچوں کے ہمراہ رہائش اختیار کر لی۔ مورخہ 13/05/2019 کو بیوی ام گھر سے نکلی تھی جس کے نسبت میں نے تھانہ رحیم آباد میں رپورٹ کیا تھا۔ اسی رپورٹ پر مذکورہ دستیاب ہو کر دارالامان چلی گئی تھی جو کہ مورخہ 21/05/2019 کو میں نے دارالامان سے نکال کر گھر خود لے گئی کہ مورخہ 21/05/2019 کو میں عدالت گلگندہ آیا ہوا تھا۔ واپس گھر خود جا کر تو زوجہ ام بمعہ بچوں کے گھر خود میں عدم موجودگی جس کی تلاش و پتہ براری شروع کر کے ابھی معلوم ہوا ہے کہ زوجہ ام کو مسمی کامران ولد قاسم نے درغلا یا پھسلا کر شادی ناجائز چانے کے خاطر لے گئی ہے۔ زوجہ ام نے بچوں عبدالرحمن بمر 9 سال، سدیس بمر 7 سال، اسامہ بمر 5 سال، حیدر علی بمر 8 ماہ بھی ہمراہ لے گئے ہیں۔ وجہ توقف رپورٹ زوجہ ام کے معلومات و پتہ براری تھی۔ میں مسمی کامران ولد قاسم سکندہ مانیار، ضلع سوات کے خلاف زوجہ ام رضیہ کو درغلا پھسلا کر لے جانیکا دعویٰ ارہوں۔ رپورٹ کرتا ہوں۔ غور ہوئے العبد مستحظ اردد، کارروائی تھانہ حسب گفتہ سائل کارپورٹ حرف بحرف درج صدر ہو کر پڑھ کر سنایا گیا۔ درست تسلیم کر کے زیر خود انگوٹھا مثبت کی جس کی میں تصدیق کرتا ہوں۔ مضمون رپورٹ سے صورت جرم بالا پائی جا کر مقدمہ مجرم بالا درج رجسٹرڈ کر کے نقل پرچہ بغرض تفتیش حوالہ شعبہ انسٹی گیشن حوالہ کیا جاتا ہے پرچہ گزارش ہے۔

دستخط انگریزی (عمر سیاب)

ASI.PS. R. Abad

Attested to be True Copy

Shabir Ahmad Khan (Dawat Khel)  
Advocate High Court  
& Federal Shariat Court

AWM  
B

10

DISCIPLINARY ACTION

I, Syed Ashfaq Anwar, PSP District Police Officer, Swat being competent authority, is of the opinion that he Constable Kamran No. 3018 while posted to Traffic Staff has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omissions as defined in Rule 2 (iii) of Police Rules 1975 with amendments 2014 vide Notification No.3859/Legal, dated 27-08-2014 of the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar, as per Provincial Assembly of Khyber Pakhtunkhwa Notification No. PA/Khyber Pakhtunkhwa/ Bills/ 2011/44905 dated 16/09/2011 and C.P.O, K.P.K. Peshawar Memo: No. 3037-62/Legal. dated 19/11/2011.

STATEMENT OF ALLEGATIONS

It has been reported that he while posted to Traffic Staff committed the following act / acts, which is / are gross misconduct on his part as defined in Rules 2 (iii) of Police Rules 1975.

One namely Habib-ur-Rahman r/o Manyar had lodged a complaint against him in Police Station Rahim Abad vide UD No. 45, dated 13-05-2019 alleging him of having illicit relations with his wife. He had alleged that on 12-05-2019 he had taken his wife out of home with bad intentions and kept her in his custody. It has also been complained that he had also earlier committed such act in the near past and later effected compromise with the complainant admitting his wrongdoing in writing. He is ruining the house of the applicant and enticing his wife to get divorce from her husband. By doing so he has brought a bad name for Police department which warrants strict Departmental action.

2. For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, SP Investigation, Swat is appointed as Enquiry Officer.

3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer and submit his findings immediately.

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

District Police Officer  
Swat  
*[Signature]*

20 /PA. Dated Gulkada the 24-05-2019

Copies of above to:-

1. SP Investigation, Swat for initiating proceeding against the accused Officer/Official namely Constable Kamran No. 3018 under Police Rules, 1975.
2. Constable Kamran No. 3018  
With the direction to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer for the purpose of enquiry proceeding.

\*\*\*\*\*

Attested to be True Copy  
*[Signature]*  
Shabir Ahmad  
Advocate High Court  
& Federal Shariat Court

CHARGE SHEET

11

I, Syed Ashfaq Anwar, PSP District Police Officer, Swat being competent authority, hereby charge you, Constable Kamran No. 3018 while posted to Traffic Staff as follows:-

You committed the following act/acts, which is/are gross misconduct on your part as defined in Rules 2 (iii) of Police Disciplinary Rules 1975 with amendments 2014 vide Notification No.3859/Legal, dated 27-08-2014 of the General of Police, Khyber Pakhtunkhwa, Peshawar.

One namely Habib-ur-Rahman r/o Manyar had lodged a complaint against you in Police Station Rahim Abad vide DD No. 45, dated 13-05-2019 alleging you of having illicit relations with his wife. He had alleged that on 12-05-2019 you had taken his wife out of home with bad intentions and kept her in your custody. It has also been complained that you had also earlier committed such act in the near past and later effected compromise with the complainant admitting your wrongdoing in writing. You are ruining the house of the applicant and enticing his wife to get divorce from her husband. By doing so you have brought a bad name for Police department which warrants strict departmental action. You are therefore issued this charge sheet and statement of allegations.

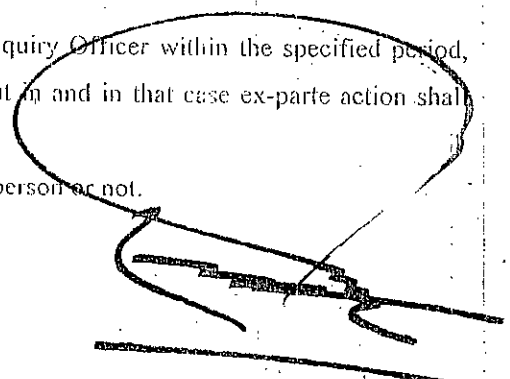
2. By reasons of the above, you appear to be guilty of misconduct and rendered yourself liable to all or any of penalties specified in Rule-4 of the Disciplinary Rules 1975

3. You are, therefore, required to submit your written reply within seven (07) 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 allegations is enclosed.

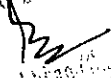


District Police Officer  
Swat

No. 20 /PA,

Dated: 24.05.2019.

Attested to be True Copy

  
Shabir Ahmad  
Advocate High Court  
& Federal Sharia Court

فائنڈنگ رپورٹ

انکوائری برخلاف کنسٹیبل کامران نمبر 3018 متعینہ پولیس لائن کبل سوات۔

الزامات :-

مسعی حبیب الرحمان ساکن حال تندو ڈاگ نے زوجہ اش اور چار بچوں کے گھر خود سے نکلنے، کنسٹیبل کامران کے ساتھ ناجائز تعلقات استوار کرنے اور شادی ناجائز رچانے کی خاطر تھانہ رحیم آباد میں رپورٹ بحوالہ مد 45 روز نامہ 13-05-2019 درج ہو کر انکوائری ایفیسر نے درخواست دربارہ محکمانہ کارروائی برخلاف کنسٹیبل کامران جناب DPO صاحب کے خدمت میں پیش کر کے درخواست پر جناب DPO صاحب نے کنسٹیبل کامران کو چارج شیٹ نمبری PA-20 محرمہ 20-05-2019 جاری فرما کر من SP انوسٹی گیشن کو انکوائری ایفیسر مقرر کرنے کا حکم صادر فرمایا۔

تحقیقات :-

انکوائری ہذا کے سلسلہ میں الزام علیہ کنسٹیبل کے علاوہ امجد علی نمبر 1601/FC ریڈر ٹریفک، اکبر حسین ASI تھانہ رحیم آباد انکوائری انصرار مدعی حبیب الرحمان ولد عدالت خان ساکن مانیار حال تندو ڈاگ رحیم آباد کے بیانات قلمبند ہو کر شامل انکوائری ہے۔ بیانات اور پیش کردہ ریکارڈ کا مطالعہ ہو کر پایا گیا کہ سال 2019 کے اوائل میں الزام علیہ کنسٹیبل کامران اور مسماۃ رضیہ زوجہ حبیب الرحمان نے ایس میں ناجائز تعلقات استوار کر کے گھر سے غائب ہونے، چند دن گزارنے کے بعد واپس آ کر مشران نے حبیب الرحمان، مسماۃ زوجہ حبیب الرحمان اور کنسٹیبل کامران کے ساتھ علیحدہ علیحدہ راضی نامے تحریر کر کے کہ کنسٹیبل کامران اور مسماۃ رضیہ آئندہ کے لئے ایک دوسرے کے ساتھ کوئی رابطہ نہیں کریں گے۔ کامران کنسٹیبل نے حلف بالقرآن وعدہ کیا اور تحریری راضی نامہ محرمہ 14-02-2019 پر دستخط ثبت کی۔ وقت گزرنے کے ساتھ ساتھ مسماۃ رضیہ اور کنسٹیبل کامران عشق کے بندھن میں اپنے کے گئے وعدوں سے مکر گئے۔ اور ایک دفعہ پھر ہردونوں مورخہ 13-05-2019 کو گھر سے نکل کر غائب ہوئے۔ مسماۃ رضیہ جو کہ چار بچوں کی ماں بھی ہے۔ کنسٹیبل کامران جو پہلے سے شادہ شدہ اور دو بچوں کا باپ ہے۔ کے ساتھ یہ رابطہ اثنائی و شادی ناجائز کی غرض سے نکل کر اسی دوران مسماۃ رضیہ نے خاوند اش مسعی حبیب الرحمان کے خلاف عدالت فیملی کورٹ میں دعویٰ تنسیخ نکاح بھی کامران کے اعانت پر دائر کی ہے۔ جو کہ زیر سماعت ہے۔ ہردونوں کے گھر خود سے نکلنے پر مسماۃ رضیہ کا شوہر حبیب الرحمان نے تھانہ رحیم آباد میں رپورٹ کر کے جس کا رپورٹ بحوالہ مد 45 روز نامہ 13-05-2019 درج ہو کر بغرض انکوائری اکبر حسین ASI کے حوالہ ہوئی۔ ASI اکبر حسین نے کارروائی کرتے ہوئے مسماۃ رضیہ عدالت کبل میں موجود پا کر واپس لا کر جو بخوشی خود خاوند اش حبیب الرحمان کے ساتھ چلی گئی۔ رات قیام کے بعد علی الصبح چاروں بچوں سمیت مذکورہ رضیہ کنسٹیبل کامران کے ساتھ ایک دفعہ پھر گھر سے نکل کر حبیب الرحمان کی رپورٹ پر کامران کنسٹیبل کے خلاف مقامی تھانہ رحیم آباد نے باقاعدہ مقدمہ عدالت 428 مورخہ 23-05-2019 جرم PPC 496-A تھانہ رحیم آباد قائم کر کے شعبہ تفتیش کو بغرض تفتیش حوالہ کی۔ تفتیشی افسر نے سلسلہ تفتیش جاری رکھ کر کنسٹیبل کامران جس نے 30-05-2019 کو عدالت سے ضمانت قبل از گرفتاری کروا کر بر ضمانت گرفتار کیا گیا۔ مسماۃ رضیہ جو کہ 03-06-2019 کو تفتیش افسر نے بازیاب کر کے دارالامان چلی گئی۔ مذکورہ کا بیان قلمبند ہو کر نقل مصدقہ کا پی عطاء الرحمان سول جج صاحب لف کاروائی ہے۔ بیان میں وضاحت کی ہے۔ مذکورہ کنسٹیبل کامران کے ساتھ عرصہ 06 سال سے ناجائز تعلقات ہے۔ مذکورہ نے خاوند اش کے خلاف تنسیخ نکاح کا کیس بھی دائر کر کے جب فیصلہ مذکورہ کے حق میں اجائے۔ تو باقاعدہ کنسٹیبل کامران کے ساتھ پسند کی شادی کرے گا۔ ہردونوں نے کئی بار زنا بالرضاء بھی کی ہے۔ کنسٹیبل کامران نے بیان دیتے وقت ایک بیان طہنی منجانب مسماۃ رضیہ بھی پیش کر کے شامل ہے۔ جس میں مذکورہ نے تمام الزامات خاوند اش حبیب الرحمان کے خلاف لگائے ہیں۔ جو 31-05-2019 کو تحریر شدہ ہے۔ جس کے بعد عدالتی بیان محرمہ 03-06-2019 میں صحیح حلف بیان دے کر دارالامان چلی گئی ہے۔

نتیجہ تحقیق :-

انکوائری ہذا کا جائزہ لے کر ذیل نکات کے پیش نظر کنسٹیبل کامران کو قصور وار ٹھہرایا جاتا ہے۔

1۔ مقدمہ کی رجسٹریشن اور انکوائری شروع کرنے سے قبل مسماۃ رضیہ اور کنسٹیبل کامران گھر خود سے غائب ہو کر یو ایس ہردونوں نے مسعی حبیب الرحمان

Attested to be True Copy  
Shahir Ahmad  
Advocate High Court  
& Federal Shariat Court

کے ساتھ تحریری راضی نامہ کیا ہے۔ جو ریکارڈ پر موجود ہے۔

2۔ سماء رضیہ کی زیر استعمال سم نمبری 0347-1304211 کنسٹیبل کامران کے شناختی کارڈ نمبر پر ایڈس ہے۔ جس پر ہر دونوں رابطے رکھے گئے۔ پولیس ہو کر ریکارڈ CDR لف ہے۔

درج بالا نکات کی رو سے کنسٹیبل کامران نے کسی حبیب الرحمان جو کہ ایک سادہ لوح بندہ ہے کے بیوی کے ساتھ ناجائز تعلقات استوار کر کے شادی کا جھانسہ دے کر اس کا گھرا جھاڑ کر ساتھ ہی ان کے چار بچوں کا مستقبل تاریک کیا ہے۔ محکمہ پولیس عوم کی جان و مال کی تحفظ کا ضامن ہے۔ نہ کہ گھر کے گھرا جھاڑنے کا جبکہ کنسٹیبل کامران قانون کار کھولا ہونے اور قانون کی پاسداری کا حلف اٹھانے کے باوجود ایک خلاف قانون فعل اور گناہ گیرہ کا مرتکب ہوا ہے۔ کنسٹیبل کامران کی اس کارستانی سے محکمہ پولیس پر عوم کی طرف سے انگلیاں اٹھانے کا موقع فراہم کیا گیا ہے۔ لہذا اگر اتفاق ہو تو کنسٹیبل کامران نمبر 3018 کو ٹیگین سزا (برخاستگی) کی سفارش کی جاتی ہے۔

ہیڈ آف انوسٹی گیشن ضلع سوات۔

PA

Dismissed for  
nice.

27/6

Attested to be True Copy

State & Federal Court

Amma  
D  
19

ORDER

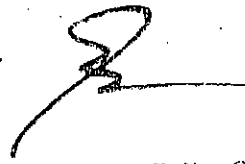
This order will dispose of departmental enquiry against Kamran No. 3018 of this district Police. He while posted in Traffic Staff was alleged of gross misconduct as one namely Habib-ur-Rahman r/o Manyar had lodged a complaint against him in Police Station Rahim Abad vide DD No. 45, dated 13-05-2019, alleging the Constable under enquiry of having illicit relations with his (applicant) wife. He had further alleged that on 12-05-2019 the delinquent Police Officer had taken his wife out of her home with bad intentions. He took her to a secluded place and kept her in his custody with ulterior motives. It was also complained that the Constable has earlier committed such acts on multiple occasions which was aggrieved by the applicant and bitterly resented by people of the locality.

He was immediately suspended and closed to Police Lines which was followed by a regular enquiry against him. He was issued a charge sheet coupled with statement of allegations vide this office No. 20/PA, dated 24-05-2019 and SP Investigation Swat was directed to carry out a regular enquiry against the delinquent Constable. The enquiry officer after doing the needful reported that the Police Officer had been in the practice of maintaining illicit relations with the applicant's wife and had been trying to entice the woman to seek divorce from her husband which was a blatant violation of discipline. The Enquiry Officer recommended major punishment for the Constable under enquiry. He was called to weekly Orderly Room and heard in person but he failed to produce any solid reason to rebut the allegations leveled against him.

The delinquent Constable has been having illicit relations with a married woman and warning the applicant of action against him which is a classic example of abuse of Police uniform and extreme violation of Code of Conduct for a Police Officer. He had earlier several times been advised by the applicant and elders of the locality to refrain from this immoral act but he turned a deaf ear to these advises and continued relations with the applicant's wife. He has several times taken the complainant's wife and kept her in his custody with ulterior motives. Police are custodians of the public. The Constable under enquiry was required to protect honor, life and property of the people rather than keeping relations with the wife of an innocent citizen. By doing so he has brought a bad name for department and stigmatised the whole Police Force. Consequently an FIR has been registered against the Constable under enquiry in Police Station Rahim Abad vide No. 428, dated 23-05-2019 u/s 496-A PPC. Perusal of the record reveals that the applicant has also earlier moved an application against the conduct of the Constable in District Public Safety Commission Swat. The Commission after evaluating the complaint reported that the Police Officer has abused his authority and had committed an immoral and unethical act and thus recommended departmental action against the Police personnel under enquiry. The conduct of the respondent Constable is detrimental to discipline and inimical to image of Police Force. His further retention in Police will create public hatred against Police and negatively influence discipline of other personnel of the Force. Hence, in exercise of the powers vested in the undersigned under Rules 2 (iii) of Police Disciplinary Rules - 1975, I Syed Ashfaq Anwar, PSP, District Police Officer Swat being competent authority, am constrained to award him major punishment of dismissal from service.

Order announced.

Attested to be True Copy  
Shahir Ahmad (Swat Khel)  
Advocate High Court  
& Federal Shariat Court

  
District Police Officer  
Swat

O.B. No. 108

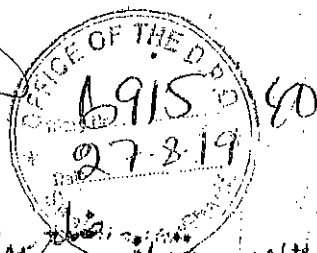
Dated: 3-7-2019.

Copy to:-

1. District Public Safety Commission, Swat with reference to the Commission letter No. 883/Comp/807, dated 23-05-2019 please.
2. Establishment Clerk

Amex

15



2050

جناب ڈی ایچ ڈی صاحب مقام سید پریکاش سوات

No 936  
dt 27/3/19

EC/OSD/Hyd  
District Commr

*[Handwritten signature]*

District Police Officer  
SWAT  
27/3

مقامی طور پر ایک شخص نے ایک خط لکھا ہے جس میں کہا ہے کہ وہ ایک شخص کے ساتھ مل کر ایک گاڑی چوری کرنے میں مددگار رہا ہے۔

2018-2019

یہ شخص نے کہا ہے کہ وہ ایک شخص کے ساتھ مل کر ایک گاڑی چوری کرنے میں مددگار رہا ہے۔

یہ شخص نے کہا ہے کہ وہ ایک شخص کے ساتھ مل کر ایک گاڑی چوری کرنے میں مددگار رہا ہے۔

REC  
District Commr  
27/3

OSD/ Legal Sec  
28/3

Attested to be True Copy

Shahir Ali  
A.C.  
22/3/19



کہ مسائل کے عزت / ساکھ / آبرو کو نقصان پہنچنے کا اندیشہ موجود ہوں۔  
 (۷) یہ کہ مسائل انتہائی قریب خاندان سے تعلق رکھتا ہے اور مسائل کا دیگر کوئی کاروبار نہ ہے  
 اور نہ مسائل نے کوئی ہنر سیکھا ہے جس سے کہ مسائل اپنے کنبہ کی کفالت کر سکیں آپ  
 صاحبان کے بارگاہ میں عرض گزار ہوں کہ مسائل مجبوریوں کے پیش نظر مسائل کو دوبارہ  
 اپنے عہدہ پر تعینات کریں تو مسائل مسائل کے چھوٹے چھوٹے سچے مسائل کے ضعیف  
 \* انہر والدین آپ کے بلڈا قابل کیلئے تاحیات دماغ اور پیسے۔ اگر مسائل کو دوبارہ اپنے  
 عہدہ پر تعینات نہ کیا گیا تو مسائل کو نامائیل تالانی نقصان پہنچنے کا قوی اندیشہ موجود ہے۔

لہذا استدعا ہے کہ منظور فرمائی درخواست ہذا  
 مسائل کے مجبوریوں کے پیش نظر مسائل کے  
 دوبارہ اپنے عہدہ پر تعینات کرنے کا حکم  
 صادر فرمایا جائے۔ نیز منظور فرمائی جو فرین  
 انصاف ہو بھی جتن مسائل مرحمت فرمائی  
 جاوے۔

26/05/19

کامران بلڈ نمبر 2018 دولت

Attested to be True Copy  
 Shahir Ahmad (Punjab) (Hd)  
 Advocate High Court  
 & Federal Shariat Court

بمضور جناب DIG صاحب بمقام سید شریف، ضلع سوات

کامران بیلٹ نمبر 3108 سوات ----- سائل

محکمانہ اپیل منجانب سائل

سائل سکنتہ مانیار، فالگے تحصیل بریکوٹ، ضلع سوات کا مستقل رہائشی اور باشندہ ہے۔ مستغیث حبیب الرحمن سکنتہ مانیار رپورٹ تھانہ رحیم آباد، بیگورہ، ضلع سوات درج رجسٹرڈ ہوا ہے۔ یہ کہ سائل بحیثیت کانسٹیبل ٹریفک سٹاف میں ڈیوٹی سرانجام دے رہا تھا اور یہ کہ بوجہ FIR سائل کو محکمہ پولیس سے بحوالہ آرڈر بک نمبر 108 مورخہ 03/07/2019 کو محکمہ سے برخاست کیا ہے۔

یہ کہ اب سائل اور مستغیث فریق کے مابین علاقہ مشران کے وساطت سے راضی نامہ عمل میں لایا گیا ہے اور سائل کو فی سبیل اللہ بخش دیا ہے اور سائل کے خلاف کوئی کارروائی کرنا نہیں چاہتے۔ (نقل راضی نامہ لف ہے)۔

یہ کہ اگر سائل ایک غریب خاندان سے تعلق رکھتا ہے اور سائل کے ضعیف العمر والدین حیات ہیں اور سائل اپنے گھر کا واحد کفیل بھی ہے۔

کہ سائل کے عزت اساکھ آبرو کو نقصان پہنچنے کا اندیشہ موجود ہوں۔

۷) یہ کہ سائل انتہائی غریب خاندان سے تعلق رکھتا ہے اور سائل کا دیگر کوئی کاروبار نہ ہے اور نہ سائل نے کوئی ہنر سیکھا ہے جس سے کہ سائل اپنے کنبہ کی کفالت کر سکیں آپ صاحبان کے بارگاہ میں عرض گزار ہوں کہ سائل مجبوریوں کے پیش نظر سائل کو دوبارہ اپنے عہدہ پر تعینات کریں تو سائل و سائل کے چھوٹے چھوٹے بچے و سائل کے ضعیف العمر والدین آپ کے بلند اقبال کے لئے تاحیات دُعا گور ہیں گے۔ اگر سائل کو دوبارہ اپنے عہدہ پر تعینات نہ کیا گیا تو سائل کو ناقابل تلافی نقصان پہنچنے کا قوی اندیشہ موجود ہے۔

لہذا استدعا ہے کہ بمنظوری درخواست ہذا سائل کے مجبوریوں کے پیش نظر سائل کو دوبارہ اپنے عہدہ پر تعینات کرنے کا حکم صادر فرمایا جائے نیز دیگر دادرسی جو قرین انصاف ہو بھی بحق سائل مرحمت فرمائی جائے۔

عریضہ

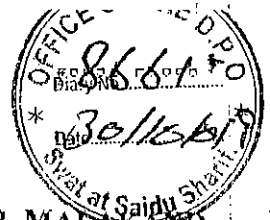
کامران بیلٹ نمبر 3108 سوات

Attested to be True Copy  
Shahir Ahmad Khan (P. at Bar)  
Advocate & Counselor  
& Federal Shikayat Centre



OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND  
SAIDU SHARIF SWAT.

Ph: 0946-9240381-88 & Fax No. 0946-9240390  
Email: digmalakand@qghoa.com



18

**ORDER:**

This order will dispose off appeal of Ex-Constable Kamran No. 3018 of Swat District for reinstatement in service.

Brief facts of the case are that Constable Kamran No.3018 while posted in Traffic Staff was alleged of gross misconduct as one namely Habib Ur Rahman R/O Manyar had lodged a complaint against him in Police Station Rahimabad vide DD No.45 dated 13/05/2019, alleging the delinquent Constable of having illicit relations with his (applicant) wife. He had further alleged that on 12/05/2019 the delinquent Police Officer had taken his wife out of her home with bad intentions. He took her to a secluded place and kept her in his custody with ulterior motives. It was also complained that the Constable has earlier committed such acts on multiple occasions which was aggrieved by the applicant and bitterly resented by people of the locality. Consequently he was issued charge sheet coupled with statement of allegations and SP Investigation Swat was appointed as Enquiry Officer. The Enquiry Officer after doing the needful reported that the Police Officer had been in the practice of maintaining illicit relations with the applicant's wife and had been trying to entice the woman to seek divorce from her husband which was a blatant violation of discipline, hence recommended him for major punishment. He was called in Orderly Room and heard him in person but he failed to produce any cogent reason in his defense. The delinquent Constable was involved in illicit relations with a married women and warning the applicant of action against him which was a classic example of abuse of Police uniform and extreme violation of Code of Conduct for a Police Officer. He had been earlier several times advised by the applicant and elders of the locality to refrain from such immoral act but he turned a deaf ear to these advises and continued relations with the applicant's wife. He has several times taken the complaint's wife and kept her in his custody with ulterior motives despite Police are custodians of the public. The delinquent Constable was required to protect honor, life and property of the people rather than sleeping relations with the wife of an innocent citizen. By doing so he has brought a bad name for department and stigmatized the whole Police Force. Consequently a case vide FIR No. 428, dated 23/05/2019 u/s 496-A PPC FIR has also been registered against the delinquent Constable in Police Station Rahimabad. Record reveals that the applicant has also earlier moved an application against the conduct of the Constable in District Public Safety Commission Swat. The Commission after evaluating the complaint reported that the Police Officer has abused his authority and had committed an immoral and unethical act and thus recommended departmental action against the above named Police personnel. The conduct of the respondent Constable is detrimental to discipline and detrimental to image of Police Force. His further retention in Police will create public hatred against Police and negatively affected discipline of other personnel of the Force. Being found guilty of the charges against him the petitioner awarded major punishment dismissal from service OB No.108 dated 03/07/2019.

He was called in Orderly Room on 23/10/2019 and heard him in person. The Police duty is to provide safety/ shelter and dignity to the civilians rather than to play with their honour. So the retention of such like official in Police Department is creating a bad name for the entire force. Besides there are 41 bad entries in his service record which shows that he is not interested in his job. Therefore his appeal for reinstatement in service is hereby filed.

Order announced.

OB No. 168

4.11.19

No. 11552/E,

Dated 28/10/2019.

District Police Officer

Regional Police Officer,  
Malakand Region, Saidu Sharif Swat

Copy of above for information and necessary action to District Police Officer, Swat with reference to his office Memo: No. 14146/E, dated 17/09/2019. Services roll and Fauji Missal of the above named Constable is returned herewith for record in your office.

\*\*\*\*\*

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OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND  
SAIDU SHARIF, SWAT

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

Email: [digmalakand@yahoo.com](mailto:digmalakand@yahoo.com)

Order:

This order will dispose off appeal of Ex-Constable Kamran No. 3018 of Swat District for reinstatement in service.

Brief facts of the case are that Constable Kamran No. 3018 while posted in Traffic Staff was alleged of gross misconduct as one namely Habib Ur Rahman R/o Manyar had lodged a complaint against him in police station Rahimabad vide DD No. 45 dated 13/05/2019, alleging the delinquent Constable of having illicit relations with his (applicant) wife. He had further alleged that on 12/05/2019 the delinquent police officer had taken his wife out of her home with bad intentions. He took her to a secluded place and kept her in his custody with ulterior motives. It was also complained that the constable has earlier committed such acts on multiple occasions which was aggrieved by the applicant and bitterly resented by people of the locality Consequently he was issued charge sheet coupled with statements of allegations and SP Investigation Swat was appointed as Enquiry Officer. The Enquiry officer after doing the needful reported that the police officer had been in the practice of maintaining illicit relations with the applicant's wife and had been trying to entice the woman to seek divorce from her husband which was a blatant violation of discipline, hence recommended him for major punishment. He was called in orderly room and heard him in person but he failed to produce any coent reason in his defense. The delinquent Constable was involved in illicit relations with a married women and warning the applicant of action against him which was a classic example of abuse of police uniform and extreme violation of code of conduct for a police officer. He had been earlier several times advised by the applicant and elders of the locality to refrain from such immoral act but he turned a dear ear to these advises and continued relations with the applicant's wife. He has several times taken the complaint's wife and kept her in his custody with ulterior motives despite police are custodians of the public. The delinquent Constable was required to protect his life and property of the people rather than keeping relations with the wife of an innocent citizen. By do so, he has brought a bad name for department and stigmatized the whole police force. Consequently acts vide FIR No. 428, dated 23/05/2019 u/s 496-A PPC Fir has also been registered against the delinquent Constable in police station Rahimabad, Record reveals that the applicant has also earlier moved an application against the conduct of the Constable in District Public Safety Commission Swat. Commission after evaluating the complaint reported

Be True Copy  
Adv. (libel)  
Court

that the police officer has abused his author had committed an immoral and unethical act and thus recommended departmental action against the name police personal. The conduct of the respondent Constable is detrimental to discipline and to image of police force. His further retention in police will create public hatred against police negatively affected discipline of other personnel of the Force. Being found guilty of the charge against him the petitioner awarded major punishment dismissal from service OB No. 108 dated 03/7/2019.

He was called in orderly Room on 23/10/2019 and heard him in person. The police duty is to provide safety / shelter and dignity to the civilians rather than to play with their honour. So, the retention of such like official in police department is creating a bad name for the entire force. Besides, there are 41 bad entries in his service record which shows that he is not interested in his job. Therefore, appeal for reinstatement in service is hereby filed.

Order announced.

*sd.*

Regional Police Officer,  
Malakand, Region, Saidu Sharif, Swat

Attested to be True Copy  
*[Signature]*  
Shahir Ahmad  
Advocate  
& Federal Magistrate (Retd)  
Malakand

Annex

(1) 2

G

21

ORDER-10  
31.07.2019

Bail Application # 254/4 of 2019

Present:

Kamran /accused-applicant on ad-interim bail along with counsel present.

Habib ur Rahman/complainant in person present.

Assistant Public Prosecutor for State.

Instant case was fixed for 03.08.2019, but learned counsel for accused/petitioner moved an application for early hearing on the ground that compromise has been effected between the parties. Hence, on the submission of learned counsel ibid, case file was requisitioned and was fixed for today.

Applicant/accused has been booked for commission of offences punishable u/ss 496 A of PPC as per an FIR # 428 dated 23.05.2019 at P.S Rahim Abad, District Swat. Instant is his plea for bail in anticipation of arrest under S. 498 Cr.P.C.

*(Handwritten signature and notes)*

The complainant appeared before the court and stated that he has effected compromise in the present case, therefore, got no objection on confirmation of bail before arrest, filed by the accused / petitioner. In this regard his statement has been recorded before the court. CNIC photocopy of the complainant is Ex PA.

Arguments heard. Record perused.

Assistant Public Prosecutor oppose instant plea about confirmation of instant BBA and contended that the section of law under which the accused/petitioner is charged is non compoundable.

Attested to be True Copy  
*(Signature)*  
Shahid Ali  
Assistant Public Prosecutor  
& Federal Shariat Court

(2)

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DER-10  
07.2019  
ntinued)

According to record, though Section of law with which accused/petitioner is charged is non compoundable in nature, but besides no objection on part of the complainant regarding confirmation of the instant BBA, the alleged victim of the occurrence namely Mst. Razia on dated 16.07.2019, during pendency of the instant BBA petition, recorded her statement to the effect that she has not been enticed away by any one rather she left the house of complainant on her own free will and has no relation with the accused/petitioner.

Besides the above, the available record also reflects some points which makes the case of present accused/petitioner one of further inquiry.


So in view of the above, accused/applicant is admitted to confirmation of bail before arrest. Ad-interim pre-arrest bail already allowed vide order dated 30.05.2019, stands accordingly confirmed on the basis of his existing bail bonds.

Order accordingly.

Note: Findings of the instant order shall have no affect upon the trial of the case in hand.


Make this order part of judicial record. Consign this file to record room after necessary completion.


Announced:  
31.07.2019

  
Rahat Ullah  
Additional Sessions Judge/  
Izafi Zilla Qazi-II, Swat

CERTIFICATE:

Certified that this order comprises two (02) pages which have been signed.

  
Additional Sessions Judge/  
Izafi Zilla Qazi-II, Swat

Attested to be True Copy  
  
Shabir Ahmad Khan (Bar-at Khel)  
Advocate High Court  
& Federal Shariat Court

Amra

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کامران بنام سرکار

بیان مستغیث حبیب الرحمن ولد عدالت خان بہ عمر قریباً 32/31 سال ساکن کوز پلو مانیار، تحصیل بریکوٹ، ضلع سوات۔

حلفاً بیان کیا کہ میری رپورٹ پر برخلاف ملزم کامران ولد محمد قاسم ساکن مانیار، تحصیل بریکوٹ، ضلع سوات مقدمہ عدالت نمبر 428 مورخہ 23-05-2019 بہ جرم زبردفعہ A-496 تپ تھانہ رحیم آباد درج رجسٹر ہوا تھا تاہم اب میں درخواست سائل / ملزم برائے ضمانت قبل از گرفتاری کی منظوری پر معترض نہ ہوں۔ میرے قومی شناختی کارڈ کی

نقل بطور EXP-A ہے۔ اصل بعد از ملاحظہ واپس شد۔

من کردوست تسلیم کیا  
31-07-2019



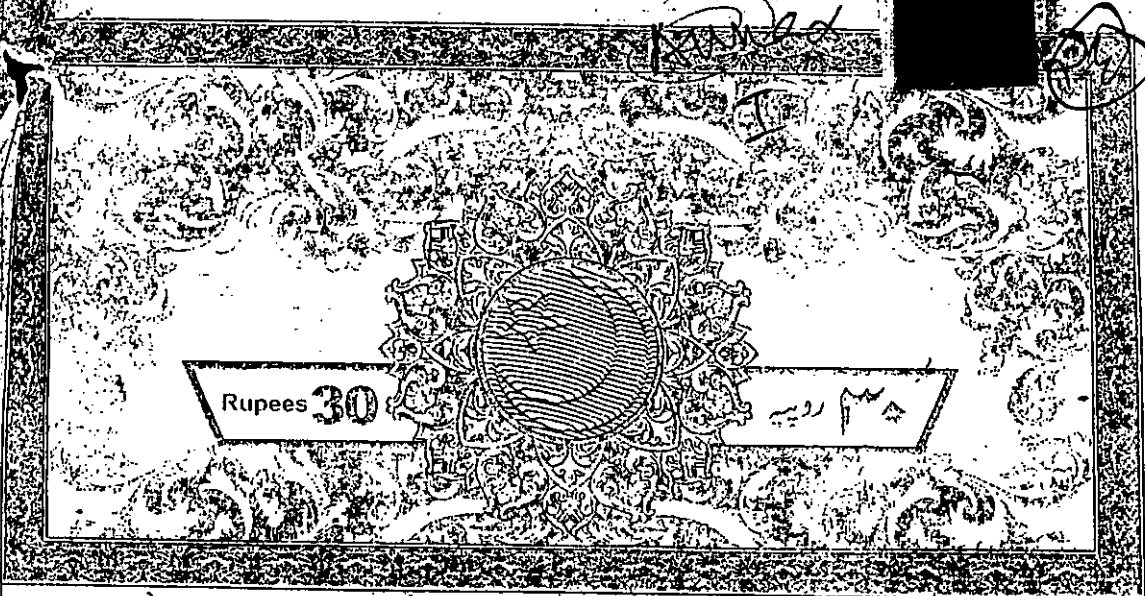
العبد  
حبیب الرحمن ولد عدالت خان (مستغیث)

راحت اللہ  
ایڈیشنل سیشن جج دوئم / اضافی ضلع قاضی، سوات  
الرقوم: 31-07-2019

Attested to be True Copy

Shahir Ahmad (Barat Kibel)  
Advocate of Court  
& Federal Shariat Court





کعبہ اللہ صواب اللہ تبارک و تعالیٰ میں دعا ہے کہ یہ رقم تمام قرضوں اور سہولتوں کو مسترد کر دیا جائے

دعویٰ: حبیب الرحمن در عدالت خان سٹریٹ کورٹ ہاؤس، کراچی۔  
نیام: راکھوانی روڈ، قاسم سٹریٹ کورٹ ہاؤس، کراچی۔  
فٹنڈ نمبر: 428 سے 496-8 جج 23/5/16  
راہنما مابین زمین

30 F  
31/7/2018

راہنما مابین زمین

۱۔ یہ کہ عدالت نے جسٹس حبیب الرحمن کی رپورٹ پر اجلاس منعقد کیا اور ان کے فیصلے کے مطابق 428 سے 496-8 جج 23/5/16 کی رقم تمام قرضوں اور سہولتوں کو مسترد کر دیا جائے۔

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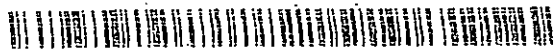
Shabir Ahmad Khan (Dawlat Kh)  
Advocate High Court  
& Federal Shariat Court

۲۔ یہ کہ عدالت نے اس میں سٹیٹ رڈ اور عدالت مشترک، کراچی کے فیصلے کے مطابق راکھوانی روڈ اور اس علاقے کے زمینداروں کو سہولتوں کو مسترد کر دیا جائے۔

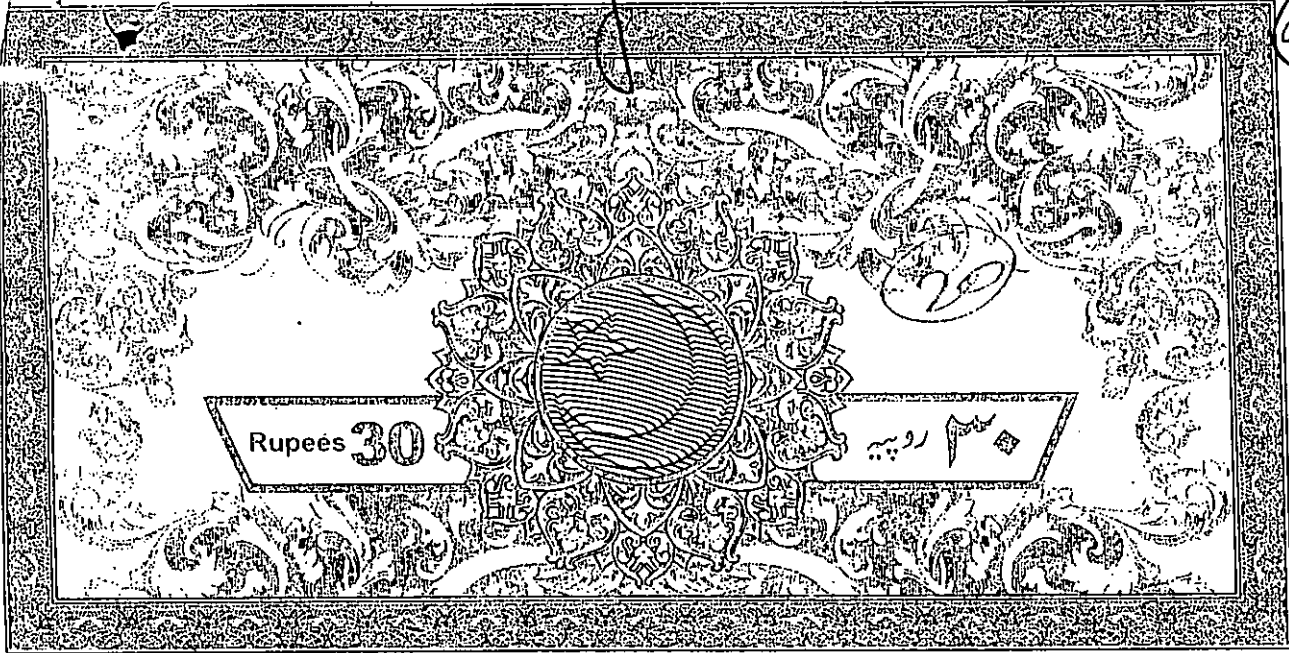
۳۔ یہ کہ زمینداروں اور راکھوانی روڈ کے زمینداروں کے درمیان میں عدالت نے فیصلے کے مطابق راکھوانی روڈ اور اس علاقے کے زمینداروں کو سہولتوں کو مسترد کر دیا جائے۔

عدالت

عدالت



95



"بیاضی"

منہ خلفہ حیاتہ رضیہ ذوق حبیب الرحمن سکاکی کہ کوز ملو جانیاں تحصیل پرکھوٹا  
 فتح پور سوات کا دیوں۔ خلفہ بیان کرتی دیوں کہ من خلفہ میں کامران کو نہ جاننے دیوں  
 اور نہ ہی میں کامران کے ساتھ من خلفہ کا کس قسم تعلق واسطہ ہے۔ نہ ہی مذکورہ  
 کامران من خلفہ کو منظور کیا ہے۔ اور نہ ہی من خلفہ کو کسی قسم تصفیہ، بیاضی  
 الیہ من خلفہ کا شوہر ہے حبیب الرحمن کے ساتھ متحدہ سرمنجلی مندرہ بند  
 سماعت ہے۔ من خلفہ کا شوہر شریف کوٹل کو بیاضی میں لیا اور ان کے  
 مال پر ہی کا کسب مختلف حربہ استعمال کیا جس طرح ۲۰۱۸ء ۲۰۱۹ء  
 کے دوران۔ حال میں من خلفہ کو کامران نامی شخص نے انجوائے میں لیا ہے۔  
 من خلفہ نے اپنی بیوی دشتہ داران نامی شخصہ داران میں بیاضی میں لیا ہے۔  
 بیاضی نامہ علم و تحقیق میں درج ہے اور اس کے  
 بیاضی میں من خلفہ نے انجوائے میں لیا ہے۔

۳۱/۵/۱۹



PAKISTAN  
 District Swat (Gr 2) (B-21)  
 No 684 Date 21-05-2019  
 Date: 21/05/19

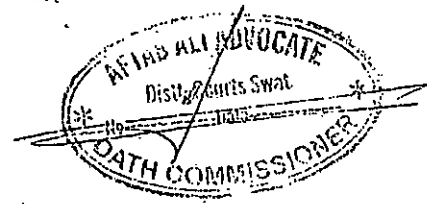
صفاہ رضیہ  
 15603-0569854-0

ATTESTED

No: 3677

Attested to be True Copy 31/5/2019

Shahir As  
 Adv.  
 & Forensic



(26)

**BEFORE THE SERVICE TRIBUNAL KHAYBER PUKHTUNKHWA**  
**AT PESHAWAR**

**WAKALAT NAMA**

Case No: \_\_\_\_\_ of 2019


**TITLE:-**

Ex-Constable Kamran No. 3108      **VERSUS**      I.G.P and others.

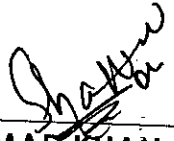
I/we do hereby appoint **SHABIR AHMAD KHAN (DAWLATKHEL)** Advocate High Court in the above mentioned case, to do all or any of the following acts, deeds and things:

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
2. To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
3. To receive payment of, and issue receipts for, all money that may be or become due and payable to us during the course of the proceedings.
4. To do any act necessary or ancillary to the above acts, deed and things.
5. To appoint any other counsel to do any/all of the acts, dee and things.
6. I/We, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non-appearance, any adverse judgment/order/decreed is passed, they will not be held responsible.

**IN WITNESS** whereof I/we have signed this **Wakalat Nama** hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this \_\_\_\_\_

  
\_\_\_\_\_  
**Signature of Executant**

**Attested and Accepted by:**

  
\_\_\_\_\_  
**SHABIR AHMAD KHAN (DAWLATKHEL)**  
Advocate High Court.

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

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable No.3108  
..... Appellant

**VERSUS**

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.  
..... Respondents

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|       | Copy of enquiry report   | A        |      |

**District Police Officer, Swat**

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable  
No. 3108

..... Appellant

**VERSUS**

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

..... Respondents

**PARAWISE REPLY BY RESPONDENTS 01 TO 04:**

**Respectfully Sheweth,**

**PRELIMINARY OBJECTIONS.**

1. That the appeal is badly barred by Law & limitation.
2. That the appellant has got no Cause of action and locus standi to file the present appeal.
3. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
4. That the appellant has not come to the Tribunal with clean hands.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has concealed the material facts from this Hon'ble Tribunal.

**FACTS:**

1. Pertain to record, hence needs no comments.
2. Incorrect. That the appellant was alleged of gross misconduct as it was reported that the appellant was involved in illicit relation with a wife of an innocent citizen. It was further reported that the appellant took her wife to a speculated place and kept her in his custody with ulterior motives. It was further found that the appellant committed such acts on many occasion. This act of the appellant brought a bad name for Police department. Consequently he was suspended and regular departmental enquiry was conducted against the appellant.
3. That regular enquiry was initiated against the appellant to probe into the above allegations. The Enquiry Officer after conducting enquiry, submitted his finding, report wherein the allegation leveled against the appellant were proved beyond the shadow of doubt, recommend him for major punishment, hence on the recommendations of Enquiry Officer, the appellant was dismissed from service vide OB NO.108 dated 03/07/2019 (**enquiry report is enclosed as annexed "A"**). The act of the appellant brought a bad name for the Police department by keeping illicit relation with a wife of an innocent citizen, hence a case vide FIR No 428 dated 23/05/2019 u/a 196 PPC was registered against the him at Police Station Rahimabad.


4. That departmental appeal of the appellant was examined and filed with cogent reasons vide Région office Endst.No.11552/E dated 28/10/2019 accordingly.

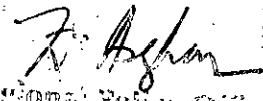
**GROUND:**

- i. Incorrect. The orders of the respondents are lawful, legal and in accordance with law/rules.
- ii. Incorrect. That the appellant was awarded major punishment of dismissal from service on the basis of departmental enquiry conducted against him as per law/rule. Criminal Court proceedings has no effect over the departmental proceeding of the appellant as both are independent from each other.
- iii. Para explained above in detail at para No.ii of grounds.
- iv. Incorrect. As stated above, all the opportunities of self defense and personal hearing have been provided to the appellant during departmental probe under the law/rule, however the appellant failed to defend the charges leveled against him.
- v. That no violation of law/rules has been made by the respondent. The orders passed by the respondents are legal, lawful and in accordance with law/rules.
- vi. This para explained above in detail.
- vii. Incorrect. That the order of respondents is legal, lawful, reasonable and in accordance with law/rules.
- viii. That other grounds not specifically answered in the reply, will be agitated with the permission of honorable Tribunal at the time of arguments.

**PRAYER:**

Keeping in views the above facts and circumstances, it is humbly prayed that the appeal of appellant being devoid of legal force may kindly be dismissed with costs.

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

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

  
District Police Officer Swat

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

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable No.3108

Appellant

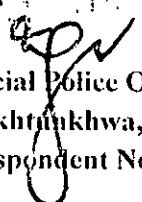
**VERSUS**

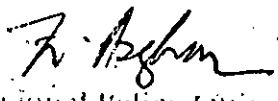
Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

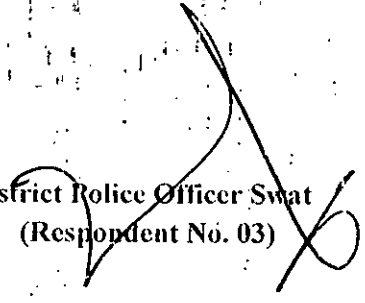
Respondents

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

  
District Police Officer Swat  
(Respondent No. 03)

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

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable No.3108

..... Appellant


**VERSUS**

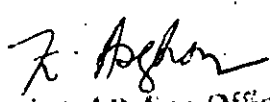
Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

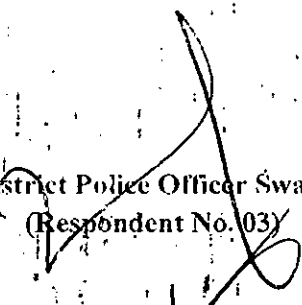
..... Respondents

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

  
District Police Officer Swat  
(Respondent No. 03)



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

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable No.3108  
..... Appellant

**VERSUS**

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

..... Respondents

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|       | Copy of enquiry report   | "A"      |      |

District Police Officer, Swat

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

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable  
No.3108

..... Appellant

**VERSUS**

Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

..... Respondents

**PARAWISE REPLY BY RESPONDENTS 01 TO 04**

**Respectfully Sheweth,**

**PRELIMINARY OBJECTIONS.**

1. That the appeal is badly barred by Law & limitation.
2. That the appellant has got no Cause of action and locus standi to file the present appeal.
3. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
4. That the appellant has not come to the Tribunal with clean hands.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has concealed the material facts from this Hon'ble Tribunal.

**FACTS:**

1. Pertain to record, hence needs no comments.
2. Incorrect. That the appellant was alleged of gross misconduct as it was reported that the appellant was involved in illicit relation with a wife of an innocent citizen. It was further reported that the appellant took her wife to a speculated place and kept her in his custody with ulterior motives. It was further found that the appellant committed such acts on many occasion. This act of the appellant brought a bad name for Police department. Consequently he was suspended and regular departmental enquiry was conducted against the appellant.
3. That regular enquiry was initiated against the appellant to probe into the above allegations. The Enquiry Officer after conducting enquiry, submitted his finding, report wherein the allegation leveled against the appellant were proved beyond the shadow of doubt, recommend him for major punishment, hence on the recommendations of Enquiry Officer, the appellant was dismissed from service vide OB NO.108 dated 03/07/2019 (**enquiry report is enclosed as annexed "A"**). The act of the appellant brought a bad name for the Police department by keeping illicit relation with a wife of an innocent citizen, hence a case vide FIR No. 428 dated 23/05/2019 u/s 496A PPC was registered against the him at Police Station Rahimabad.

4. That departmental appeal of the appellant was examined and filed with cogent reasons vide Region office Endst No.11552/E dated 28/10/2019 accordingly.


**GROUND:**

- i. Incorrect. The orders of the respondents are lawful, legal and in accordance with law/rules.
- ii. Incorrect. That the appellant was awarded major punishment of dismissal from service on the basis of departmental enquiry conducted against him as per law/rule, Criminal Court proceedings, has no effect over the departmental proceeding of the appellant as both are independent from each other.
- iii. Para explained above in detail at para No.ii of grounds.
- iv. Incorrect. As stated above, all the opportunities of self defense and personal hearing have been provided to the appellant during departmental probe under the law/rule, however the appellant failed to defend the charges leveled against him.
- v. That no violation of law/rules has been made by the respondent. The orders passed by the respondents are legal, lawful and in accordance with law/rules.
- vi. This para explained above in detail.
- vii. Incorrect. That the order of respondents is legal, lawful, reasonable and in accordance with law/rules.
- viii. That other grounds not specifically answered in the reply, will be agitated with the permission of honorable Tribunal at the time of arguments.

**PRAYER:**

Keeping in views the above facts and circumstances, it is humbly prayed that the appeal of appellant being devoid of legal force may kindly be dismissed with costs.

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

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

  
District Police Officer Swat

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

**Service Appeal No. 1584/2019**

\*Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable No.3108

..... Appellant

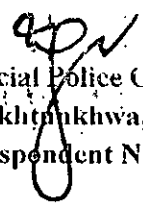
**VERSUS**


Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

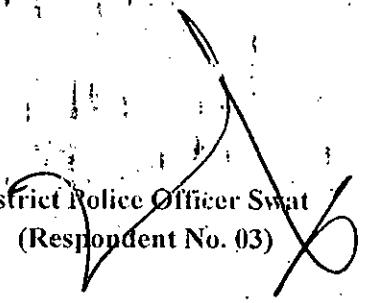
..... Respondents

**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,  
Majakand Region,  
(Respondent No. 2)

  
District Police Officer Swat  
(Respondent No. 03)

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

**Service Appeal No. 1584/2019**

Kamran S/O Qasim R/O Manyar Tehsil Barikot, district Swat Ex-Constable No.3108

..... **Appellant**

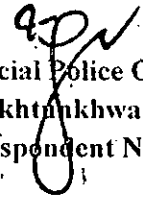
**VERSUS**

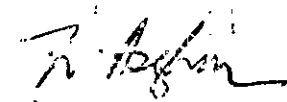
Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar & others.

..... **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,  
(Respondent No. 2)

  
District Police Officer Swat  
(Respondent No. 03)

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

**JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.**

*Regd*  
No.

*TB Swat*

Appeal No. *1584* of 20 *19*

*Kamran* Appellant/Petitioner

Versus

*PPO Peshawar* Respondent

Respondent No. *4*

Notice to:

*Habib ur Rehman S/O Adalat Khan  
R/O Manyar Kuz Palas Manyar Teh Barikot  
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 *11/6/2022* 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 *9* .....

Day of *5* 20*22*

*at camp court*

*Swat*

*[Signature]*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,

**"B"**

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

*TB Swat*

No. *39*

Appeal No. *1584* of 20 *19*

*Kamran*

Appellant/Petitioner

*PPO Peshawar* <sup>Versus</sup>

Respondent

Respondent No. *5*

Notice to: —

*Mst Razya w/o Habib or Rehman R10*  
*Kuz Palas Manyar Barikot 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 *11/6/22* 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.

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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 *9* Day of *5* 20 *22*

*at Camp Court*

*Swat*

*2*

*[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.

"A"

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

No. *1584*

*TB Swat*

APPEAL No.....*1584*..... of 20 *19*

*Kamran*

Appellant/Petitioner

Versus

*PPO Peshawar*

RESPONDENT(S)

Notice to Appellant/Petitioner *Counsel* *Shabiz Ahmad Khan*

office address: *(Advocate)*

*Hamza Law Chamber Dubai Plaza*  
*Near Azad Medical Company DAKKHANA Road*  
*Mingora Swat*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *7/6/22* at *8:00 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.





"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

*Resg*

*TB Swat*

No.

APPEAL No..... *1584* ..... of 20 *19*

*Kamran*

Appellant/Petitioner

Versus

*PPO Peshawar*

RESPONDENT(S)

Notice to Appellant/Petitioner

*Kamran S/O Qasim R/O  
Manyar Teh Barikot Distt Swat  
Ex Constable NO 3108*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *11/6/22* at *8:00 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.