

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

Service Appeal No. 8638/2020

BEFORE: KALIM ARSHAD KHAN --- CHAIRMAN
FAREEHA PAUL --- MEMBER(E)

Asif Shahzad, Ex-SI No. 4-H of District Abbottabad
..... (*Appellant*)

VERSUS

1. Govt: of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar.
2. IGP, Khyber Pakhtunkhwa, Peshawar.
3. Regional Police Officer, Hazara Region, Abbottabad.
4. District Police Officer, Abbottabad.

..... (*Respondents*)

Present:

MOHAMMAD ARSHAD KHAN TANOLI,
Advocate --- For Appellant.

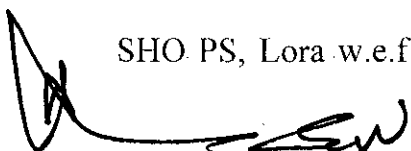
SYED NASEER UD DIN,
Assistant Advocate General --- For respondents.

Date of Institution.....27.07.2020
Date of Hearing.....20.05.2022
Date of Decision20.05.2022

JUDGEMENT:

KALIM ARSHAD KHAN, CHAIRMAN:- The service appeal has been instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 for declaration to the effect that the appellant has been dismissed from service vide impugned dismissal order No. 90, dated 13.05.2020 and departmental appeal of the appellant has been rejected vide order No. 17458 dated 23.07.2020.

02. Brief facts as per memorandum of appeal are that the appellant was serving in the respondent-department as SI and was posted as SHO PS, Lora w.e.f 13.02.2020 to 30.03.2020. That the respondent-




department conducted an enquiry against the appellant and on the basis of the enquiry report, the appellant had been illegally been dismissed from service vide impugned order dated 13.05.2020. Feeling aggrieved from the said order, the appellant filed departmental appeal on 20.05.2020 which was rejected vide order dated 23.07.2020, hence, the instant service appeal filed in this Tribunal on 27.07.2020.

03. Notices were issued to the respondents who submitted written replies/comments and contested the appeal.

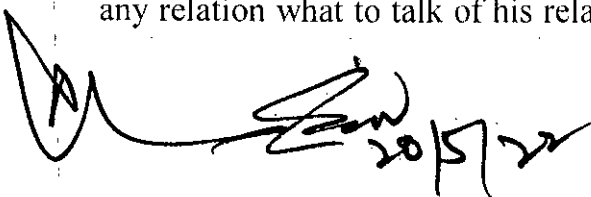
04. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

05. Learned counsel for the appellant contended that the dismissal order dated 30.03.2020 and rejection of departmental appeal dated 23.07.2020 were illegal, discriminatory, perverse and without any lawful justification, hence, liable to be set aside. That the appellant had not been provided opportunity of personal hearing as well as show cause notice and allegations against the appellant were based on surmises, conjectures, hypothesis and mere supposition. He further contended that the allegations leveled against the appellant had not been proved and he had been made a scapegoat due to no fault of the appellant. Besides, no one lodged any complaint against the appellant during the period when he was SHO of P.S Lora. He submitted that the appeal might be accepted and the appellant might be reinstated in service with all back benefits.


20/15/22

06. Learned Assistant Advocate General on the other hand submitted that the appellant while posted as SHO Police Station, Lora failed to implement the directions issued by Provincial Government and District Police regarding provision and control of Covid-19, his careless and biased behavior towards the general public and failed to control the drug peddlers and having links with drug peddlers tantamount to his willful negligence. That he was also used to obtain illegal gratification from the drug peddlers. Therefore, the respondent No.4 rightly departmentally had proceeded against the appellant and after fulfilling all the codal formalities, awarded major punishment i.e. Dismissal from service.

07. The appellant was mainly proceeded for his alleged mismanagement during the days of Covid-19, his careless attitude alleged bad behavior towards general public, failure to control and take action against drug peddlers and having links with them. The action was based on enquiry report wherein statements of some police officials were recorded and the police officials complained of the behavior of the appellant with the general public and in some statements it was alleged that he had relations with the drug peddlers. There is no one from the respectables of ilaqa associated with the enquiry proceedings or at least to substantiate the allegation of that alleged bad behavior of the appellant nor is there any complaint of any private person of the area placed on file in this respect. Similarly the police officials who had appeared in the proceedings had not named any of the alleged drug peddlers with whom the appellant was having any relation what to talk of his relation affecting his duties or to show

A handwritten signature in black ink, followed by the date '20/5/22' written below it.

and prove that he had been guilty of any misconduct. As against that admittedly the appellant had not more than 40 to 45 days tenure as SHO Police Station Lora Abbottabad during which he has not only himself recovered contraband Chars from different people but had also recovered arms and ammunition as well as other actions against the violative of law and in this respect he had produced photocopies of the FIRs of the relevant point of time. Therefore, the impugned action taken against the appellant does not seem justified rather the allegation of the appellant that the action was malafide finds support from the above circumstances, therefore on allowing this appeal; we set aside the original as well as the appellate orders. The appellant is reinstated in service from the date of his dismissal with all back benefits. Costs shall follow the event. Consign.

08. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal this 20th day of May, 2022.*



(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD



(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

20.05.2022

Appellant alongwith his counsel present. Mr. Naseer Ud Din, Assistant Advocate General alongwith Mr. Shamraiz Khan, SI for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, on allowing this appeal; we set aside the original as well as the appellate orders. The appellant is reinstated in service from the date of his dismissal with all back benefits. Costs shall follow the event. Consign.

Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal this 20th day of May, 2022.



(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD




(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

17.02.2022 Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 19.05.2022.


Reader

19.05.2022 Counsel for the appellant present. Syed Naseer Ud Din, Assistant Advocate General for respondents present.

Record submitted which is placed on file. To come up for arguments before D.B tomorrow i.e on 20.05.2022 at camp court Abbottabad.


(Fareeha Paul)
Member(E)

(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

17.11.2021

Appellant in person and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Shamraiz Khan, ASI for respondents present.

Representative of the respondents seeks further time to furnish reply/comments. Last opportunity is granted to the respondents to submit reply//comments on the next date positively, otherwise, their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 28.12.2021 before S.B at camp court, Abbottabad.



Chairman

Camp Court, A/Abad

28.12.2021

Clerk of counsel for the appellant and Mr. Muhammad Rasheed Khan, DDA alongwith Shamraiz Khan, ASI (Legal) for the respondents present.

The respondents have furnished reply/comments. Placed on file. The appeal is assigned to D.B for arguments on 17.02.2022 before the D.B at camp court, Abbottabad.


Chairman

Camp Court, A/Abad

19.02.2021

Appellant present through counsel.

Preliminary arguments heard. File perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 15.06.2021 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security and Process Fee

23/2/21

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

15.06.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 30.09.2021.

Reader

30.09.2021

Appellant in person and Mr. Muhammad Adeel Butt, Addl. AG alongwith Atif Ali, Law Advisor for the respondents present.

Written reply of the respondents is still awaited. Respondents are directed to furnish reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck off and the appeal will be heard on the basis of available record without reply of the respondents. Case to come up on 17.11.2021 before S.B at camp court, Abbottabad.

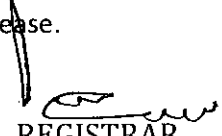

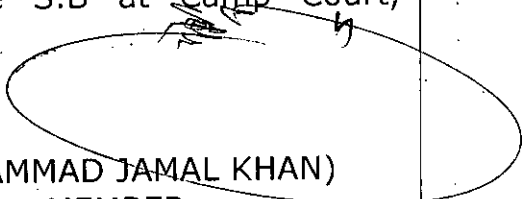
Chairman
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 8638 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/07/2020	<p>The appeal of Mr. Asif Shahzad presented today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20.11.20</u></p> <p> CHAIRMAN</p>
	20.11.2020	<p>Appellant has not forth come, however, clerk of counsel for appellant is present and requested for adjournment on the ground that learned counsel for appellant is not available today. Adjourned to 19.02.2021 on which date file to come up for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER CAMP COURT ABBOTTABAD</p>

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

Appeal No. 8638 /2020

Asif Shahzad, Ex. SI No. 4-H of District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs,
Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

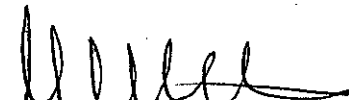
INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service appeal along with affidavit	1 to 9	
2.	Copy of impugned dismissal order No. 90 dated 13/05/2020	10	"A"
3.	Copy of departmental appeal	11	"B"
4.	Copy of impugned rejection letter No.17458 dated 23/07/2020	12-15	"C"
5.	Wakalatnama	16	


...APPELLANT

Through

Dated: 25/07 /2020


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

1

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

Appeal No. 8638 /2020

**Khyber Pakhtunkhwa
Service Tribunal,**

Diary No. 8089

Dated 27/7/2020

Asif Shahzad, Ex. SI No. 4-H of District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar.
2. IGP, Khyber Pakhtunkhwa, Peshawar.
3. Regional Police Officer, Hazara Region, Abbottabad.
4. District Police Officer, Abbottabad.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT HAS BEEN DISMISSED FROM
SERVICE VIDE IMPUGNED DISMISSAL
ORDER NO. 90, DATED 13/05/2020 AND
DEPARTMENTAL APPEAL OF THE
APPELLANT HAS BEEN REJECTED VIDE
ORDER NO.17458 DATED 23/07/2020 THE
APPELLANT HAS BEEN DISMISSED FORM
SERVICE WITHOUT ANY LAWFUL

Filed to-day

Registrar

27/7/2020

JUSTIFICATION AND WITHOUT FOLLOWING THE PRESCRIBED PROCEDURE REQUIRED TO BE FOLLOWED PRIOR TO THE AWARDING OF MAJOR PENALTY. HENCE IMPUGNED DISMISSAL ORDER NO. 90, DATED 13/05/2020 AND REJECTION OF DEPARTMENTAL APPEAL ORDER No.17458 DATED 23/07/2020 ARE LIABLE TO BE SET-ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED DISMISSAL FROM SERVICE ORDER NO. 90 DATED 13/05/2020 AS WELL AS REJECTION OF DEPARTMENTAL APPEAL ORDER NO. 17458 DATED 23/07/2020 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY BE DIRECTED TO RE-INSTATE THE APPELLANT IN SERVICE FROM THE DATE OF HIS DISMISSAL WITH ALL SERVICE BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

Following are the facts, giving rise to the instant service appeal.

1. That the appellant was serving in Police Department as SI and was posted as SHO P.S Lora w.e.f 13/02/2020 to 30/03/2020.
2. That the appellant during his 1½ months tenure as SHO, P.S Lora, performed duties with due diligence, devotion and dedication upto the required standard. During the said period the appellant being SHO Police Station Lora turned no stone unturned in following the SOP of COVID-19. In this regard there is no complaint from any person of the locality.
3. That respondents department conducted an enquiry against the appellant in the so-called following allegations;
“You SI Asif Shahzad while posted as SHO PS Lora, have miserably failed to implement the directions issued by provincial Government and District Police

regarding COVID-19, your careless attitude, bad behavior toward general public, failure to control and take action against drug peddlers, speaks your willful negligence toward your lawful assigned duties. It was also reported that you are obtained illegal gratification from drug peddlers etc. All this shows your slackness and gross mis-conduct on your part being member of discipline force.”

4. That on the basis of the inquiry report, the appellant has illegally been dismissed from service vide impugned dismissal order No. 90 dated 13/05/2020. Copy of impugned dismissal order No. 90 dated 13/05/2020 is annexed as Annexure “A”.
5. That the appellant filed departmental appeal against the impugned dismissal order dated 13/05/2020 vide departmental appeal dated 20/05/2020 Copy of departmental appeal is annexed as Annexure “B”. The appeal of the appellant has been rejected vide impugned rejection letter No.17458 dated 23/07/2020 which is attached as Annexure “C”. Hence

this instant service appeal is filed inter-alia on the following grounds;-

GROUND S;-

- a. That dismissal order dated 30/03/2020 and rejection of departmental appeal letter dated 23/07/2020 are illegal, discriminatory, perverse and without any lawful justification. Hence the dismissal order dated 13/05/2020 and rejection letter 23/07/2020 are liable to be set-aside.

- b. That the appellant has not been provided opportunity of personal hearing as well as show cause notice and allegations against the appellant are based on surmises, conjectures, hypothesis and mere supposition. The appellant is a law abiding person and always followed the law and committed no mistake/ offence while dealing with the criminals drug paddlers and public at large during the 1½ months period when he was

posted as SHO P.S Lora w.e.f. 13/02/2020 to 30/03/2020.

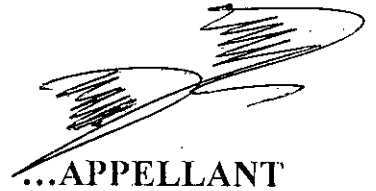
- c. That the so-called allegations have not been proved against the appellant and he has been made a scapegoat due to no fault of his. Besides, no one lodged any complaint against the appellant during period when he was SHO of P.S Lora.
- d. That the worth and progress of the appellant during 1½ month period as SHO is worth perusal. The respondents with malafide intentions did not go through the progress and service record as well as reply to the statement of allegations and the reply to the questioner of the inquiry officer.
- e. That it is worth mentioning that the appellant has not committed misconduct during the period 1½ month. Hence, the conduct of the respondents towards appellant is

against the fair play and the principle of good governance.

- f. That when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. The major penalty imposed upon the appellant is against the law, facts and is based on the whims and wishes of the respondents which is not maintainable at law.
- g. That respondents has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice. The prescribed procedure has not been followed. Hence impunged dismissal order of the appellant is arbitrary, malafide and liable to be cancelled.
- h. That appeal of the appellant is within the period of limitation. The matter in issue relates to the terms and conditions of service. Hence the

Honourable Tribunal has jurisdiction to entertain the instant service appeal.

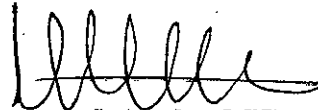
It is, therefore, humbly prayed that on acceptance of the instant service appeal, impugned dismissal from service order No. 90 dated 13/05/2020 as well as rejection of departmental appeal order No. 17458 dated 23/07/2020 may graciously be set-aside and respondents may be directed to re-instate the appellant in service from the date of his dismissal with all service back benefits. Any other relief which this Honourable Tribunal deem appropriate may also be granted to the appellant.



...APPELLANT

Dated: 25/7 /2020

Through



(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

VERIFICATION;-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal



...APPELLANT

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

Appeal No. _____/2020

Asif Shahzad, Ex. SI No. 4-H of District Abbottabad.


...APPELLANT

VERSUS

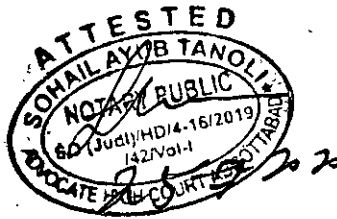
Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs,
Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Asif Shahzad, Ex. SI No. 4-H of District Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.




DEPONENT

Annex-A

ORDER

P-10

This office order will dispose of the departmental enquiry against Mr. Asif Shahzad No. 04/11 the then SHO PS Lora. He while posted as SHO PS Lora, have miserably failed to implement the directions issued by Provincial Government and District Police regarding prevention and control of COVID-19, his careless attitude, bad behavior toward general public, failure to control & take action against drug peddlers and having links with them, speaks his willful negligence toward his lawful assigned duties. It was also reported that he is obtaining illegal gratification from drug peddlers which showed his slackness and gross misconduct on his part being Station House Officer

He was issued Charge Sheet along with statement of allegations. Mr. Rashid Ahmad DSP Legal Abbottabad was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings wherein allegations have been proved against delinquent officer. He was summoned to appear in Orderly Room on 06-05-2020. He was given a patient hearing but he had nothing plausible to state in his defence.

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

Order announced.
OB No. 30
Dated 13-05-2020

Muhammad Arshad
[Signature]
Muhammad Arshad
Advocate High Court
Office No 33 Adja
Dist. Twp Abbott
District Police Officer
Abbottabad

CC

- 1 Pay Officer, DPO Office Abbottabad.
- 2 Establishment Clerk alongwith complete enquiry file containing (34) pages for completion of record.
- 3 OHC for necessary action.
- 4 OB Clerk DPO Office.

BETTER COPY

ORDER

This notice order will dispose of the department enquiry against **SI Asif Shahzad No.04H the then SHO PS Lora**, have miserably failed to implement the directions issued by Provincial Government and District Police regarding prevention and control of COVID-19, his careless attitude, bad behavior toward general public, failure to control & take action against drug peddlers and having links with them, speaks his willful negligence toward his lawful assigned duties. It was also reported that he is obtaining illegal gratification from drug peddlers which showed his slackness and gross misconduct on his part being Station House Office.

He was issued charge sheet alongwith statement of allegations **Mr. Rashid Ahmad DSP Legal Abbottabad**, was appointed as Enquiry Officer. He conducted proper department enquiry against the delinquent official and recorded statements of all concerned after conduction proper department enquiry, the Enquiry Officer submitted his findings wherein allegations have been proved against delinquent officer. He was summoned to appear in Orderly Room on 06/05/2020. He was given a patient hearing that he had nothing plausible to state in his defence.

Therefore, in exercise of the powers vested in the undersigned police Disciplinary Rules 1975 (Amended 2014). I Javed Iqbal, PSP, District Police Officer, Abbottabad as competent authority, am constrained to award him the punishment or **Dismissal from service** with immediate effect.

Order announced

OB No.20
Dated:13-05-2020

SD/- _____
Muhammad Arshad
Advocate High Court
Office No.33, District
Abbottabad.

SD/- _____
District Police Officer
Abbottabad

CC:

1. Pay Officer, DPO Office Abbottabad.
2. Establishment Clerk alongwith complete enquiry file containing 34 pages for completion of record.
3. OHC for necessary action.
4. OB Clerk DPO Office.

Attested

Annex - B

اپیل برائے بحال کرنے سروس

P 11

جناب عالی!

اپیل ذیل معروض ہے۔

سائل محکمہ پولیس میں بطور S 1 اپنی خدمات سرانجام دے رہا تھا۔ سائل مورخہ 13-02-2020 کو تھانہ لورہ میں بطور SHO تعینات ہوا۔ سائل کو مورخہ 30-03-2020 کو تھانہ لورہ سے معطل کر کے لائن حاضر کیا گیا۔ اور سائل پر بذریعہ شوکاژ نوٹس الزام لگایا گیا کہ سائل نے موجودہ لاک ڈاؤن میں ڈیوٹی میں کوتاہی کی ہے اور لوگوں کے ساتھ رویہ ٹھیک نہ ہے اور منشیات فروشوں سے رقم لی ہے۔

جناب عالی!

سائل نے بطور SHO لورہ کل 40/42 یوم ڈیوٹی سرانجام دی ہے۔ جو سائل نے اپنی تعیناتی کے دوران محنت اور لگن سے ہر ممکن حد تک احسن طریقے سے ڈیوٹی سرانجام دی ہے۔

سائل نے لاک ڈاؤن میں بازار لورہ کو بند کروا کر بیرونی اضلاع سے آنے والے راستوں کو بند کروایا۔ اور سائل نے کبھی بھی عوام سے بداخلاقی یا جارحانہ رویہ نہیں رکھا۔

سائل نے اپنی پوری سروس کے دوران منشیات فروشوں سے نہ تو کبھی رقم لی ہے بلکہ سائل کا ریکارڈ اس بات کا گواہ ہے کہ سائل نے منشیات فروشوں کے خلاف سخت سے سخت کارروائی کی ہے۔

سائل نے تھانہ لورہ میں پہلے سے تعینات چند ملازمان کو اپنے سرکل افسر کے حکم پر تھانہ سے تبدیل کروایا۔ جس پر میرے خلاف من گھڑت اور بے بنیاد پراپیگنڈہ کیا گیا۔ اور افسران بالا کو جھوٹے SMS کروا کر میری شہرت کو نقصان پہنچایا۔

یہ کہ سائل کو دوران انکوائری صفائی کا موقع نہ دیا گیا اور ایک طرف انکوائری کر کے سائل کو محکمہ سے ڈمس کر دیا گیا ہے۔ بعدہ سائل کو فیصلہ کی مصدقہ نقول بھی فراہم نہ کی گئی ہے۔ نقل درخواست لف ہے۔

بذریعہ اپیل استدعا کی جاتی ہے کہ جناب DPO صاحب کے حکم برخاستگی کو منسوخ کر کے من سائل کو اپنی سروس پر بحال کرنے کا حکم صادر فرمایا جائے۔

جناب کی عین نوازش ہوگی،

الموقوم: 20-05-2020

Muhammad Ashtia Khan Tanoli
Advocate High Court
Office No. 33 Adjacent to
Distt. Abbottabad

حارضی

0344-5811405 X-SII/4-H آصف شہزاد

0315-0848219 محکمہ پولیس ضلع ایبٹ آباد



P-12
Annex-C

OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

☎ 0992-9310023

✉ r.rpohazara@gmail.com

🕒 0345-9560687

NO: 17457/PA DATED 23/7/2020


ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. SI Asif Shehzad No. H/04 of District Abbottabad against the punishment order i.e. *Dismissal from Service* awarded by DPO Abbottabad vide order No.90 dated 13.05.2020.

Brief facts leading to the punishment are that the appellatant while posted as SHO PS Lora miserably failed to implement the directions issued by Provincial Government and district Police regarding prevention and control of COVID-19. His careless and bad behavior towards general public, failure to control and take action against drug peddlers, links with drug peddlers speaks his willful negligence towards lawful assigned duties. Reportedly, he was obtaining illegal gratification from drug peddlers.

The appellatant was issued charge sheet alongwith summary of allegations and Rashid Ahmed, DSP Legal was deputed to conduct departmental enquiry. During the course of enquiry the allegations leveled against the appellatant were proved. He was called in OR and heard in person, however he failed to advance any cogent reason in his defence. Consequently, DPO Abbottabad awarded him major punishment of dismissal from service.

After receiving his appeal, comments of DPO Abbottabad were sought and examined/perused. The undersigned called the appellatant in OR and heard him in person. However he failed to advance any plausible justification in his defence. Moreover, the EO has also concluded that the charges leveled against the official have been established. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 instant appeal is hereby *filed* with immediate effect.


Qazi Jamil ur Rehman (PSP)
REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

No. 17458 /PA, dated Abbottabad the 23/7/2020.
CC.

The District Police Officer, Abbottabad for information and necessary action with reference to his office Memo No.2176/Legal dated 10-06-2020. Service Roll and Fuji Missal containing enquiry file of the appellatant is returned herewith for record.

Attested


S. Muhammad Irshad
Office Superintendent
For Regional Police Officer
Hazara Region Abbottabad

سازد
 محمد عتیق رضا ایس ای لکھنؤ
 4-11-11

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (1) 1970-71 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (2) 1971-72 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (3) 1972-73 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (4) 1973-74 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (5) 1974-75 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (6) 1975-76 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (7) 1976-77 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (8) 1977-78 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (9) 1978-79 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (10) 1979-80 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (11) 1980-81 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (12) 1981-82 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (13) 1982-83 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (14) 1983-84 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (15) 1984-85 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (16) 1985-86 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (17) 1986-87 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (18) 1987-88 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (19) 1988-89 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

میں نے اپنے پاپرز کے بارے میں عرض کی ہے کہ یہ ذیل عرصوں میں ہوئی ہیں
 (20) 1989-90 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں
 (21) 1990-91 کے دوران میں میری طرف سے لکھنؤ میں ایک عدالت میں

موج ۱۳۲/۲۰ ۳۰ تہ

کمار دنگی دھرم پور ۱۵۵ لور کھنیا تی ۶۲ لوم

فنیات P-15		اسی		دیگر فنیات
رقبہ	باندی	رقبہ	باندی	رقبہ
۶	۴۷۰۰	۱۳	۸ = منہوں ۴ = فنیوں ۱ = اقل	۹۱
	۵۰		کارٹوس ۸۰	

Aleslee

M. Anshu

Tareti

P-16

کورٹ فیس

وکالت نامہ

Service Tribunal kpk Peshawar بعدال

Asif Shahzad Govt of kpk عنوان:

Appellant منجانب:

Service نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے وائس پیروی اور اجراء کی کل کارروائی متعلقہ آن مقام

Muhammad Arshad Khan Taseed
Advocate High Court
Office No. 33 Adjacent to
Distt Bar Abbottabad

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم:

بمقام:

Accepted
Muhammad Arshad Khan Taseed
Advocate High Court
Office No. 33 Adjacent to
Distt Bar Abbottabad

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

SERVICE APPEAL NO. 8638/2020.

Asif Shahzad, Ex. Sub-Inspector No. 4/H of District Abbottabad.

..... **Petitioner.**

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar and others.

..... **Respondents.**

Para wise comments on behalf of Respondent No. 2, 3 & 4.

INDEX

S.No.	Detail of Documents	Annexure	Page No.
1	Reply	-	1 & 2
2	Affidavit	-	3
3	Copy of Inquiry Report	"A"	4 to 6
4	Copy of Dismissal Order	"B"	7
TOTAL			07 Pages



DSP Legal, Abbottabad.

D.1

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

SERVICE APPEAL NO. 8638/2020.

Asif Shahzad, Ex. Sub-Inspector No. 4/H of District Abbottabad.

.....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar and others.

.....Respondents.

Para-wise Reply by Respondents.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

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

ON FACTS:-

1. Correct to the extent that the appellant was employee of Police department and served as SHO.
2. Incorrect. The appellant while posted as SHO Police Station, Lora failed to implement the directions issued by Provincial Government and District Police regarding provision and control of COVID-19, his careless and biased behavior towards the general public and failed to control the drug peddlers and having links with drug peddlers tantamount to his willful negligence. He also obtained illegal gratification from the drug peddlers. Therefore, the respondent No. 4 rightly departmentally proceeded against the appellant and after fulfilling all the codal formalities, awarded major punishment. i.e. Dismissal from Service (Copy of inquiry report is attached as Annexure "A").
3. Pertains to record. Proper inquiry under Khyber Pakhtunkhwa Police Rules 1975 was initiated against the appellant wherein the charges mentioned in para No. 02 were established.
4. Incorrect, the respondent No. 4 after fulfilling all codal formalities rightly dismissed the appellant from Service vide OB No. 90, dated 13-05-2020 (Copy of dismissal order is attached as annexure "B").


5. Pertains to record. However, it is pertinent to mention here that there is no solid ground available on record, which negates the allegations level against the appellant. Therefore, the departmental appeal was rightly rejected. (Copy of departmental appeal and appellate order is attached as Annexure "C"). Furthermore, the appellant approached the Honorable Service Tribunal with unsound ground.

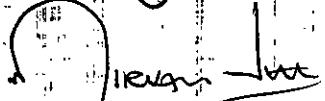
ON GROUNDS:-

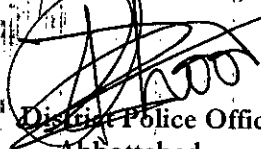
- a. Incorrect. Both the orders of the respondents are lawful, legal and based on facts and justice, hence, liable to be remained intact.
- b. Incorrect. The appellant was treated as per law/Rules personally heard dully mentioned in impugned orders and the respondents fully taken into consideration all the codal formalities and principles of natural justice while dealing the appellant departmentally.
- c. Incorrect. The allegations leveled against the appellant have been proved during the course of inquiry and thereafter, respondent No. 4 dismissed the appellant from service.
- d. Incorrect. There is no malafide exist on the part of respondents against the appellant.
- e. Incorrect. Already explained in reply on facts.
- f. Incorrect. The appellant was proceeded against departmentally in accordance with law and after fullfilling all the codel formalities, he was awarded major punishment i.e. dismissal from service which commensurate with the proved charges.
- g. Incorrect. The respondents properly adopted the legal course and no malafide exist against the appellant by the respondents.
- h. Legal. However, preliminary objections already raised in *vide-supras*.

PRAYER.

In view of above, it is most humbly prayed, that the instant writ petition having no legal footings, hence may graciously be dismissed with heavy costs please.


 Inspector General of Police,
 Khyber Pakhtunkhwa,
 Peshawar.
 (Respondent No. 1 & 2)


 Regional Police Officer,
 Hazara Region, Abbottabad.
 (Respondent No.3)


 District Police Officer,
 Abbottabad.
 (Respondent No.4)

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

SERVICE APPEAL NO. 8638/2020

Asif Shahzad, Ex. Sub-Inspector No. 4/H of District Abbottabad.

.....Appellant.

VERSUS


Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs, Khyber Pakhtunkhwa, Peshawar and others.

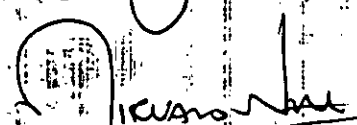
.....Respondents.

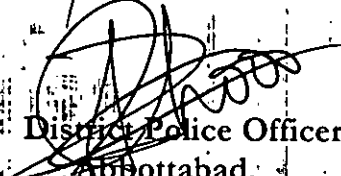
AFFIDAVIT.

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

Submitted please.


Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No.1&2)


Regional Police Officer,
Hazara Region, Abbottabad
(Respondent No.3)


District Police Officer,
Abbottabad.
(Respondent No.4)

ENQUIRY REPORT.

This enquiry report is aimed to dispose of the departmental enquiry against SI Asif Shahzad presently under suspension in Police lines, Abbottabad. The departmental enquiry has been marked to the undersigned vide letter No. 41/PA dated 30.03.2020 by your good honour.

1. BACK GROUND/ ALLEGATIONS.

The charges against the delinquent SI are as under:-

That he while posted as SHO PS Lora, have miserably failed to implement the directions issued by Provincial Government and District Police regarding COVID-19, his careless attitude, bad behavior toward general public, failure to control & take action against drug peddlers, speaks his willful negligence toward his lawful assigned duties. It was also reported that he was obtaining illegal gratification from drug peddlers etc.

2. ENQUIRY PROCEEDINGS.

During course of enquiry, the undersigned summoned the defaulter SI Asif Shahzad, PWs namely HC Ikram Ali No. 129, LHC Sajjad Ahmed No.217, Malik Hamayun No. 26 / ex-serviceman, and HC Imran No. 573. The undersigned recorded the statements of defaulter SI and PWs which are self-explanatory and annexed with enquiry file. However, the essence of each statement is given below, separately:

i. Statement of delinquent SI Asif Shahzad.

He stated that he implemented the directives of the high ups regarding control of COVID-19, announcement was carried out through loud speakers and lock down the bazar except medical and general stores and declined to have bad behavior towards general public. He further stated that PS Lora having boundaries with Islamabad & Rawalpindi and the people, during those days, rushed to their native villages through Lora bazar which caused rush on main road. He rebutted the allegation of links with drug peddlers and stated that he booked the drug peddlers in the cases of narcotics. He also stated that he was directed by the SDPO regarding use of drugs by the Police officials in the premises of Police station. Consequent upon he got transferred the police officials from PS Lora, which enraged them and as a revenge they falsely implicated him in the charges.

During cross examination, delinquent SI admitted that in the past while he was posted as MHC PS Donga Gali, awarded the major punishment of dismissal from service, due to negligence. In a cross question, relating to the imposition of section 144 Cr.P.C by the District Administration, he admitted that he did not take any action u/s 188 PPC. Initially, during cross examination he declined that there is no drug peddler residing

P.5

in the jurisdiction of PS Lora but later on he admitted that only a single drug peddler was residing, against whom a case of vide FIR No. 56 dated 19.02.2020 u/s 9 C-CNSA has been registered in PS Lora. He also stated that he did not incorporate any report in the Daily Dairy against the drug users (Police officials).

ii. Statement of IHC Ikram Ali No. 129 of Police Station City.

During his statement he disclosed that he remained posted as MHC Police station Lora from 06.08.2018 to 09.03.2020. Later on he was transferred to PS City. Being a member of discipline force, he always complied the orders of his seniors and served the department eagerly. He also transpired that he remained as Moharrir with delinquent SHO and complied his legal orders. In his statement he did not disclose reasons of his transfer as stated by the delinquent SI. During cross examination he astonishingly admitted that being Moharrir of Police station, he has no idea about any drug peddler in the jurisdiction of PS Lora. So far as the behavior of the delinquent officer with the general public is concerned, he categorically admitted that his behavior was rude with the general public.

iii. Statement of LHC Sajjad Ahmed No. 217 of PP Bodla.

He stated that he remained posted in PS Lora as Moharrir DRC and was transferred to PP Bodla on 09.03.2020. He remained posted for about 8/9 days as Moharrir DRC during tenure of delinquent SI, and did not disclose anything which incriminate the delinquent SI while during cross examination he admitted that applicants used to come to the DRC through SHO and he further admitted that drug peddlers are residing in the jurisdiction of PS Lora. He also disclosed that the behavior of SHO Asif Shahzad was not polite with the general public.

iv. Statement of Malik Hamayun No. 26 Ex-Serviceman of PP Chamhatti.

He stated that he remained posted twice with the delinquent SHO in PS Mangal and Lora. He always complied all the official and private orders of the SHO. During cross examination he disclosed that there are several drug peddlers residing in the jurisdiction of PS Lora and by name he knows only two drug peddlers. He also disclosed that one drug peddler namely Sagheer Ahmed used to come and meet with the delinquent SI.

v. Statement of Muhammad Imran 573/HC PP Changla Gali.

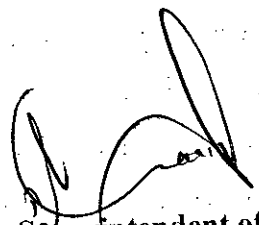
He stated that he remained posted in PS Lora from 28.08.2019 to 09.03.2020 as IHC with delinquent SHO Asif Shahzad. During his posting, being a member of discipline force, he complied the orders of the SHO. In his statement he did not pointed

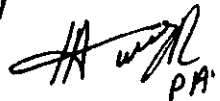
out any incriminating word against the delinquent SHO but during cross examination, he admitted that there 2/3 drug peddlers residing in the jurisdiction of PS Lora. He also admitted that the behavior of the SI Asif Shahzad with the general public was average.


3. FINDINGS.

After careful evaluation of statements of the witnesses as well as the statement of delinquent SI coupled with cross examinations, it has been surfaced that the delinquent SI did not adopt precautionary measures regarding prevention of spread of corona virus (COVID-19). He badly failed to proceed against the perpetrators u/s 188 PPC as to book them under the law is the demand of time, in the current scenario. In his examination in chief, he admitted that there are drug peddlers residing in the jurisdiction of PS Lora and he registered 05 cases of narcotics against them, while in cross examination, on one hand, he negated the drug peddler in the jurisdiction of PS Lora, while on the other hand, he affirmed about the presence of single drug peddler. Similarly, the response of the delinquent SI regarding links with the drug peddlers was unsatisfactory. The use of drugs within the premises of Police station Lora is a serious issue but he did not bother to incorporate a single report in the Daily Diary in this regard. The bad behavior, of the delinquent SI towards general public, has already been proved, which is against the norms of the discipline force and sufficient to prove the allegations levelled against the delinquent officer as envisaged in the charge sheet and summary of allegation.

Keeping in view the above facts and circumstances, allegations levelled against the delinquent SI, have been proved beyond any shadow of doubts, hence, he is recommended for appropriate action please.


Deputy Superintendent of Police,
Legal, Abbottabad.

Six, submitted please

PA
30-4

OR

DPO AID

ORDER

This office order will dispose of the departmental enquiry against **SI Asif Shahzad No. 04/H the then SHO PS Lora**. He while posted as SHO PS Lora, have miserably failed to implement the directions issued by Provincial Government and District Police regarding prevention and control of COVID-19, his careless attitude, bad behavior toward general public, failure to control & take action against drug peddlers and having links with them, speaks his willful negligence toward his lawful assigned duties. It was also reported that he is obtaining illegal gratification from drug peddlers which showed his slackness and gross misconduct on his part being Station House Officer.

He was issued Charge Sheet along with statement of allegations. **Mr. Rashid Ahmad DSP Legal Abbottabad** was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings wherein allegations have been proved against delinquent officer. He was summoned to appear in Orderly Room on 06-05-2020. He was given a patient hearing but he had nothing plausible to state in his defence.

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

Order announced.

OB No. 90
Dated 13-05-2020

~~Signature~~
District Police Officer
Abbottabad

CC.

1. Pay Officer, DPO Office Abbottabad.
2. Establishment Clerk alongwith complete enquiry file containing (34) pages for completion of record.
3. OHC for necessary action.
4. OB Clerk DPO Office.



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

No. 1650 /ST

Dated: 10/06/2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To

District Police Officer,
Abbottabad.

Subject: JUDGMENT IN APPEAL NO. 8638/2020 OF MR. ASIF SHAHZAD VS
POLICE

I am directed to forward herewith a certified copy of Judgment dated 20-05-2022 passed by this Tribunal on the above subject for information please.

Encl: As above


(WASEEM AKHTAR)
REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

ابتدائی اطلاع رپورٹ

ابتدائی اطلاع رپورٹ جرم قابل ہوتے انداز میں لکھی، رپورٹ شدہ زیر دفعہ 102 مجموعہ ضابطہ جہادی

صفحہ

صفحہ نمبر 54

28

تاریخ وقت وقوع 17/2/20 وقت 16:00

تاریخ وقت 17/2/20 وقت 16:30

حاکم آباد 17/2/20 وقت 17:00
1301-744534
0312-0848219

گوت اطلاع برصغیر آئی سیٹ سٹریٹ 5405
پتہ (مردانہ) کمال اللہ پوریا بازار

برآمدگی 985 گرام چرس

رہبر دفعہ C.N.S.A 9

8/8 ملو میٹر از قمار
61101-1016839-5
0312-9335311

ملازمین کے تعلق کی اطلاع درج کرنے میں توقف ہوا، تاہم بیان کرو

مورسیدگی حواسم ضررہ نامم عوا

ملک بدر سہیل ریکورٹ

ابتدائی اطلاع نیچے درج کرو۔

ابتدائی اطلاع نیچے درج کرو۔ گوتت صدر ضررہ حواسم ضررہ مستغنیہ بندر ح
 لائن 3194 میں 3194 کی وصول ہو کر دلال نے ضررہ 44 نمبر لورہ احمد ذریعہ سے حوائج حاصل
 کی اور وہیں سے ایک شخص پیدلا بہت سے ایک ملاقی ہوا جسکو شک کی بنا پر انہوں
 نے گرفتار کیا گیا۔ اس شخص سے ایک پتہ حاصل کیا گیا جو اسکو اسوار سے بلاشک کے ساتھ
 گرام چرس سے 985 گرام چرس کے ساتھ ایک پتہ حاصل کیا گیا جو اسکو اسوار سے بلاشک کے ساتھ
 گرام چرس سے 985 گرام چرس کے ساتھ ایک پتہ حاصل کیا گیا جو اسکو اسوار سے بلاشک کے ساتھ
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 گرام چرس سے 985 گرام چرس کے ساتھ ایک پتہ حاصل کیا گیا جو اسکو اسوار سے بلاشک کے ساتھ

MHC-PS-Lora
17-2-2020

قلم نمبر 11-105

ابتدائی اطلاع ریپورٹ

ابتدائی اطلاع بہت بڑی قابل دست اندازی آپس میں شدت زیدتی 153 بجوے ضابطہ جاری

شمارہ
55

مبلغ بیسٹ ہمار

تاریخ وقت وقوع 17/2/2020 وقت 17:10 بجے

<p>مقامت اپارٹ 17/2/2020 وقت 17:10 بجے</p>	<p>پولیس اسٹیشن (153 بجوے) 15AA</p>
<p>حاکمین کے نام 1351-7441534-3 0315-0848219</p>	<p>مقامت اپارٹ 15AA</p>
<p>پروفیشنل کا نام 20 عدہ کارٹوس</p>	<p>پروفیشنل کا نام 20 عدہ کارٹوس</p>
<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>	<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>
<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>	<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>
<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>	<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>
<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>	<p>پروفیشنل کی شناخت پروفیشنل کا نام</p>

ابتدائی اطلاع بخیرے درج کرو۔ عدالت کے حوصلہ زلزلے سے تھرر 14 بجے پوری پوری
 اور درمیان میں 394 دیگر تفریق ہو گیا ہے۔ ایسا گنت و چکنگ ہو لیو یس وقت صدر
 مائے و سوزی بالہ اور خود بخا کر ہمارے کہو کہانیت سے نیکیا نر 4958- IDB خونی کو روٹ کر ڈرا ہو
 کی حاتم بلدی کی کہ میرے بڑھاس لوڑ سے ایفیرت سول 30 اور بلڈنر میرے پورے ہوا صلہ خیر
 حاتم بلدی کے پروفیشنل کی داس لعلی جیب سے 20 عدہ کارٹوس 30 اور پورے ہوتے والے سوز
 ملتی ہو خیر کوڑے استعمال شدہ کہہ کی نیت خونی لائنس نہ پیش کر سکا دریافت پروفیشنل ڈرا ہو
 ہے اس نام عدالت کے ولولہ خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر
 کہو سول بالہ کہہ مرنج خیر بالہ کا یا کہہ صواب منابہ کرتا کرتے ڈاس لعلی خیر خیر خیر خیر خیر خیر
 کہہ سول بالہ 394 ارسلان خیر سے خیر ملزم خیر سے خیر خیر خیر خیر خیر خیر خیر خیر خیر
 کاوت و لکھتے ڈسٹ 3% خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر
 شیراز خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر خیر
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اگر اے علی
 MHE ps-Loh
 17-02-2020

ابتدائی اطلاعی رپورٹ

تاریخ

ابتدائی اطلاع نمبر 67 مل 58/11/405 اور نمبر 13101-7461554-3 کے تحت

نمبر	6	نمبر	82
تاریخ	وقت 15:10 بج	تاریخ	وقت 15:40 بج
1	تاریخ وقت رپورٹ	2	نام و کنونت اطلاع دہندہ
2	نام و کنونت اطلاع دہندہ	3	مقرر کیفیت (معدومہ) حال اگر کوئی نام
3	جائے وقوعہ اطلاع دہندہ	4	کارروائی جو تفتیش کے حلقے کی ہے اگر اطلاع دہندہ کے
4	تاریخ سے مددگی کی تاریخ وقت	5	نام و کنونت مقرر

ابتدائی اطلاع نمبر 67 مل 58/11/405 اور نمبر 13101-7461554-3 کے تحت
 نام و کنونت اطلاع دہندہ: احمد شہزاد خان 13101-7461554-3
 مقرر کیفیت (معدومہ) حال اگر کوئی نام: نام لکھا گیا ہے
 جائے وقوعہ اطلاع دہندہ: نام لکھا گیا ہے
 کارروائی جو تفتیش کے حلقے کی ہے اگر اطلاع دہندہ کے: نام لکھا گیا ہے
 نام و کنونت مقرر: نام لکھا گیا ہے
 تاریخ سے مددگی کی تاریخ وقت: نام لکھا گیا ہے

MHC-Ps. 1054
5-3-20

فارم نمبر ۱۲۰۲ (۱)

۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا

۱۱۴۴

ضلع اسیان مار

۷۰

تاریخ منتقلی ۳۰ دسمبر ۱۹۵۲ء

۳۰ دسمبر ۱۹۵۲ء

حاصلہ رقم ۳۰ دسمبر ۱۹۵۲ء

۵۳۱۱۵۲۱۱۴۵۸
۱۳۱۵۱ - ۷۴۴۱۵۳۳۴

آصف شہزاد

۱۳۱۵۱ - ۷۴۴۱۵۳۳۴

۲۶۹

پرنسپل اور ڈپٹی پرنسپل

۵۳۱۵۳۹۵۲۴۱۱
۱۳۱۵۱ - ۵۲۶۵۵۵۵ - ۶

۱۳۱۵۱ - ۵۲۶۵۵۵۵ - ۶

۱۳۱۵۱ - ۵۲۶۵۵۵۵ - ۶

۱۳۱۵۱ - ۵۲۶۵۵۵۵ - ۶

ابتدائی اطلاع نیچے درج کرو۔

۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔
۳۱ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا اور ۳۰ دسمبر ۱۹۵۲ء کو درجہ اولیٰ میں داخلہ ہوا۔

۱۳۱۵۱ - ۵۲۶۵۵۵۵ - ۶

ابتدائی اطلاعی رپورٹ

2011-12-20

فہرست نمبر: 200 (1)

محمد زین العابدین

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر نمبر 1512120 و مضابطہ چارجی

ذاتی کارڈ	73
تاریخ وقت وقوع جرم	10:30 بجے
مقام وقوع جرم	کھانہ نمبر 3
فہرست نمبر	10:50 بجے
تعداد	279
مقام وقوع جرم	کھانہ نمبر 3
وقت وقوع جرم	13102-0412946-1
مقام وقوع جرم	0312-9181343
مقام وقوع جرم	0344-5811405
مقام وقوع جرم	7441554-3
مقام وقوع جرم	13101-7441554-3

ابتدائی اطلاع نیچے درج کردہ واقعہ جو کہ ذیل ہے: ...

مقام وقوع جرم: کھانہ نمبر 3

وقت وقوع جرم: 10:30 بجے

تعداد: 279

مقام وقوع جرم: کھانہ نمبر 3

وقت وقوع جرم: 13102-0412946-1

مقام وقوع جرم: 0312-9181343

مقام وقوع جرم: 0344-5811405

مقام وقوع جرم: 7441554-3

مقام وقوع جرم: 13101-7441554-3

از علی
 3-3-20

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اسات پورٹ

خانہ
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بابت اطلاع

ابتدائی اطلاع کے دوران کروڑ پتی کے ہونے کے بارے میں
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ڈاکٹر علی

MHC - P. - Lower
3 - 3 - 20