FORM OF ORDER SHEET

Court of	, i	
Case No		1894 /2022

	Cas	e No 1894 /2022
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	 2	3
1-	22/12/2022	The appeal of Mr. Muhammad Tahir re-submitted
1	22/12/2022	
	•	today by Mr. Yasir Rauf Wazir Advocate. It is fixed for
		preliminary hearing before Single Bench at Peshawar
		on Notices be issued to appellant and his counsel
		for the date fixed.
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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1894 /2022

Muhammad Tahir

VS

Provincial Police Officer KP & others

<u>INDEX</u>

S.No	Description of Documents	Annexure	Pages
1	Grounds of Service Appeal, List of Books, Certificate and Affidavit		1-13
2	CM Application for suspension of impugned order dated 01/09/2022 and Affidavit		14-15
3	Copy of Service Book	, A ,	16-18
4	Copy of Notification dated 16/10/2020	В	19-21
5	Copy of Pay Slip	С	22
6	Copy of letter dated 11/08/2021	D	23-24
7	Copies of letter dated 17/08/2021 and	E, E-1&F, F-1	
<i>.</i>	03/09/2021 and better copies		25-38
8	Copy of 1 st Inquiry dated 30/06/2021	G	39-41
9	Copies of Suspension order dated 25/11/2021	H, H-1	
	and better copy		42-42-1
10	Copies of order dated 01/12/2021 and better	i, i-1	,
	сору		43-43-1
11	Copy of order dated 06/12/2021	J	44

			•
12	Copy of order dated 14/12/2021	J-1	45
13	Copy of order dated 23/02/2022	К	46
14	Copy of Restoration order dated 25/02/2022	L	47
15	Copy of impugned 2 nd inquiry committee	M	
	Recommendations dated 24/08/2022		48-52
16	Copies of impugned Struck off dated 01/09/2022 and better copy	N, N-1	53-55-1
17	Copy of Departmental Appeal dated 12/09/2022	0	56-59
18	Copy of 3 rd inquiry committee dated 10/11/2022	P	60
19	Wakalatnama		61

APPELLANT

THROUGH

Dated: 14/12/2022

YASIK RAUF WAZIR ADVOCATE HIGH COURT BANNU (M.A, LL.B, LL.M IL (IIUI)

Cell # 0332-9745361

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

<u>PESHAWAR</u>

Service Appeal No. 1894_{J2022}

Muhammad Tahir S/o Khushdil Khan R/o Mattaki Bizen Khel, Tehsil & District Bannu, Presently working in Police Department Sub Division Wazir Bannu. (Appellant)

VERSUS

- 1) Secretary Home & Tribal Affairs department, Police Lines Road,
 Finance Department, Civil Secretariat, Khyber Pakhtunkhwa,
 Peshawar.
- 2) Deputy Secretary (Judicial) Home & Tribal Affairs department, Police Lines Road, Finance Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 3) Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
- 4) Regional Police Officer, Bannu Region Bannu.
- 5) District Police Officer, District Bannu.
- 6) District Account Officer, District Bannu. (Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED STRUCK

OFF/TERMINATION ORDER NO. 3897-3906 DATED 01/09/2022,

WHEREBY THE APPELLANT HAS BEEN STRUCK OFF/TERMINATED

FROM POLICE DEPARTMENT. IN THIS RESPECT THE

DEPARTMENTAL APPEAL FILED BY THE APPELLANT ON

12/09/2022 BEFORE THE APPELLATE AUTHORITY (RPO BANNU)

BUT UPTIL NOW HE NEITHER RESPOND NOR DECIDED THE SAME

AFTER COMPLETION OF MANDATORY PERIOD.



NOTE:

Addresses of the parties given above are sufficient for the purpose of service.

Respectfully Sheweth;

The Appellant most earnestly seeks permission of this Honourable Court to submit as under;

- That the Appellant being a peaceful, respectable and law abiding citizen of Pakistan, and is entitled for all the fundamental rights guaranteed in Part-II Chapter 1 under the Constitution of Islamic Republic of Pakistan 1973.
- 2. That the Respondents are governmental entities; performing functions in connection with the affairs of the Province, as their activities are regulated by laws made by the state and are therefore amenable to the Constitutional Jurisdiction of this Honourable Court.
- 3. That initially the Appellant was serving in Levies/Khasadar force of Sub-Division Wazir and subsequently merged in Khyber Pakhtunkhwa Police Department Sub Division Wazir Bannu in the year 2019 and still working with heart and soul and to the entire satisfaction of his high-ups.

(Copy of Service Book is attached as Annexure-A)

4. That the Appellant was absorbed as ASI (BPS-11) vide Notification No. SO (Police) HD/SMY 2019 Merged Area/2410-20 dated 16/10/2020 by Secretary Home and Tribal Affairs Department with the prior approval of the cabinet and on recommendation of the Provincial Police Officer.

(Copy of Notification dated 16/10/2020 is attached as Annexure-B)

5. That after absorption as Assistant Sub Inspector (BPS-11), the Appellant was performing his duties as ASI and is regularly receiving their monthly salaries since their absorption to the Khyber Pakhtunkhwa police Department till August, 2022.

(3)

(Copy of Pay Slip is attached as attached as Annexure-C)

6. That on 11/08/2021, the Appellant was selected for 03 months
Basic Police Training as Assistant Sub Inspector (BPS-11) by the
District Police Officer (DPO) Bannu and the said list was forwarded
to the Assistant Inspector General of Police (Training).

(Copy of letter dated 11/08/2021 is attached as attached as Annexure-D)

7. That on 17/08/2021, the District Police Officer Bannu sent letter to Assistant Inspector General of Police (Training) regarding provision of data of Head Constables/ASI/Constables and Inspectors of Newly merged districts and in response the same was forwarded back to the DPO Bannu vide letter dated 03/09/2021 and the name of the Appellant was duly verified as Assistant Sub Inspector (BPS-11).

(Copies of letter dated 17/08/2021 and 03/09/2021 and better copies are attached as attached as Annexure-E, E-1&F, F-1)

8. That the then Regional Police Officer (RPO) Bannu constituted the inquiry committee regarding Absorption in Levies/Khasadar and comprising Inspector Muhammad Farooq Khan SDPO (Chairman), Inspector Rizwan Khan SDPO/Rural-II and Senior Clerk Javed Khan Head Clerk as members and they filed the inquiry report vide No. 197-200 dated 30/06/2021.

(Copy of 1st Inquiry dated 30/06/2021 is attached as Annexure-G)

 That suddenly, the then District Police Officer (DPO) Bannu suspended the service of the Appellant vide order No. 8836 dated 25/11/2021 till the arrival of proper verification from Home Department, Peshawar.

(Copies of Suspension order dated 25/11/2021 and better copy are attached as Annexure-H, H-1)

(M)

10. That in this regard the then District Police Officer (DPO) Bannu constituted the committee vide order No. 9004-8 dated 01/12/2021 comprising of Mr. Rizwan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk DPO Office for the purpose to carry out verification.

(Copies of order dated 01/12/2021 and better copy are attached as Annexure-I, I-1)

11. That the Section Officer (Levy & Khasadar) Home and Tribal Affairs

Department vide order No. SO (Police) HD/SMY 2019 Merged

Area/1333-36 dated 06/12/2021 and stated therein that Mr.

Rizwan SDPO Rural Circle-II Bannu and Mr. Javed Iqbal Head Clerk

DPO Office visited the office of the undersigned and the committee was provided relevant record and verified the same.

(Copy of order dated 06/12/2021 is attached as Annexure-J)

12. That it is pertinent to mention here that committee members mentioned in para No. 11, on 14/12/2021, states that "Dispatched register of the office of Section Officer (Levies & Khasadars) Home Department was checked with regard to the numbers issued depicted on the notifications which were found correct.

(Copy of order dated 14/12/2021 is attached as Annexure-J-1)

13. That in the light of letter No. 793/EC dated 23/02/2022 received from RPO office Bannu Region Bannu with the following remarks recorded by the RPO Bannu Region Bannu;

"As they have been lawfully absorbed in Police Department in BPS-11 by Home Department, therefore proceed as per law on the subject".

(Copy of order dated 23/02/2022 is attached as Annexure-K)

14. That in compliance with the Worthy RPO order dated 23/02/2022 and in the light of the proper verification carried out, the Appellant was hereby restored w.e.f (Suspension date) i.e.

(S)

25/11/2021 by the then District Police Officer Bannu vide order No. 1270-74/SRC(SDW) dated 25/02/2022.

(Copy of Restoration order dated 25/02/2022 is attached as Annexure-L)

15. That all of a sudden once again when the matter was resolved by high-ups, the District Police Officer Bannu vide impugned order dated 11/08/2022 constituted the committee regarding probe into suspicious/controversial notifications and they recommended that the absorption of the Appellant is contrary to the Khasadar Act.

(Copy of impugned 2nd inquiry committee recommendations dated 24/08/2022 is attached as Annexure-M)

16. That in the light of the recommendations raised by the inquiry committee, the District Police Officer Bannu issued an impugned order No. 3897-3906 dated 01/09/2022 and awarded the major penalty by struck off of the Appellant from Police Department.

(Copies of impugned Struck off order dated 01/09/2022 and better copy are attached as Annexure-N, N-1)

17. That on 12/09/2022, the Appellant has filed departmental appeal under section 22 of the Civil Servant Act, 1973 against the impugned inquiry committee recommendations dated 24/08/2022 and impugned struck off/termination order dated 01/09/2022 before the worthy Regional Police Officer Bannu Region Bannu through proper channel.

(Copy of Departmental Appeal dated 12/09/2022 is hereby attached as Annexure-O)

18. That despite preferred an appeal and still pending before worthy Regional Police Officer Bannu Region Bannu and the petitioners are quite hopeful to be re-instated into service with all back benefits, meanwhile on 10/11/2022, the Respondent No.2

conducted an impugned another 3rd inquiry regarding the absorption order of the Appellant.

(Copy of 3rd inquiry committee dated 10/11/2022 is attached as Annexure-P)

19. That the Appellant being aggrieved from the illegal and unlawful conduct of the Respondents by issuing the impugned Reversion order dated 01/09/2022, then statutory period of 90 days are also lapsed on the appeal of the appellant, thus having no other remedy and dissatisfied by the actions and inactions, Appellant seeks to approach this Hon'ble Tribunal inter alia on the following grounds:-

GROUNDS:

- A) That the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 is against law, illegal, unlawful, against the Civil Servant Act, 1973.
- B) That the fundamental rights of the Appellant has blatantly been violated by issuing the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic republic of Pakistan 1973.
- C) That the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 is illegal, unlawful, unnatural, void-ab-initio, null and void in the eye of law, hence liable to be declared so.
- D) That without given any notice or given an opportunity of personal hearing was given to the Appellant and issuance of the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 is the clear cut violation of Right to fair trial i.e. Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 and also against

the settled norms of service laws/rules prescribed for all the

E) That according to the legal maxim, "Nemo debit bis vexari (No could be vexed twice for the same offence)" Subsequent proceedings taken against employee on same charge was not justified as no one could be vexed twice for one and same cause. Apex Court in a number of judgments held that Government, was directed to take necessary measures in such matter so that there was no repetition of such mistake in future. Meaning thereby that the Appellant is being harassed and has been vexed twice for double punishment, which is against the mandate of Article 13 of the Constitution of Islamic Republic of Pakistan, 1973. Meaning thereby that the Appellant is being harassed and has been vexed twice for double punishment, which is against the mandate of Article 13 of the Constitution of Islamic Republic of Pakistan, 1973.

institutions.

- F) That according to Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011; Section 5 (a) deals with proceed itself against the accused by showing cause notice and dispense with inquiry. Section 7 (d) deals with opportunity of personal hearing before passing any order of penalty, if it is determined that the charges have been proved against him. Section 10 (d) deals that direction to the accused to submit written defense to the inquiry officer/committee within reasonable time. Similarly, Section 15 of the said act deals with personal hearing.
- That according to Section 77 (2) of the Police Act, 2017 "Subject to the rules, a member of the police may at any time be suspended, dismissed, compulsorily retired, reduced in rank or pay, within a time scale, fined, censured or awarded any other punished in the prescribed manner. But in the instant case, no proper legal procedure was taken by the Respondents.



- H) That if the Appellant is being struck off/terminated from the Police Department, then the dignity of the Appellant will be in danger in the Police department as well as in the entire society.
- That according to absorption Notification dated 16/10/2020, the necessary entries has already been made in the service record of the Appellant and also absorbed into the Police Constable department as ASI BPS-11 and also draw their regular salaries in ASI Rank.
- That the law demands justice may not only be done, it should manifestly be done, keeping in view the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 is the clear cut disparity amongst the other officials of the Police Department, as the domain of Article 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973 have been grossly violated by the Respondents in order to adopt favoritism and biased approach. Hence impugned struck off/termination order No. 3897-3906 dated 01/09/2022, not only illegal, ultravires, unjustifiable, corum-non-judice but also against the fundamental rights of the Appellant enshrined in the Constitution of Islamic Republic of Pakistan, 1973.
- K) That according to section 12(3) of the Civil Servant Act, 1973, "No such civil servant as aforesaid shall be dismissed or removed from service, or reduced in rank, until he has been given a reasonable opportunity of showing cause against the action proposed to be taken against him". In the instant case, the said provision did not follow by the Respondents.
- That as mentioned in the subject, the Appellant is yet to serve the force as well as beloved country till 60 years of age, but issuing the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 is highly unlawful, against the vested right of the Appellant.

- (9)
- M) That the Apex Court time and again held that the principle of "Audi Altern Partam" natural justice required that a regular inquiry should be conducted in the matter and opportunity of defense and personal hearing should be provided, otherwise it would condemned unheard and in the instant matter, without adopting the required mandatory procedure resulting in manifest injustice, because of entire action was taken unilaterally by the Respondents against the Appellant by issuing the impugned struck off/termination order No. 3897-3906 dated 01/09/2022.
- N) That the actions or omissions have infringed the fundamental rights of the Appellant, including those enshrined under articles 4, 8, 9, 18, 25 and 38 of the Constitution of Islamic republic of Pakistan 1973, these all speak about the well-being of the people, equitable adjustment of rights, protection of life and liberty etc.
- O) That the Respondents are Constitutionally, legally, morally and ethically bound to provide the same facility, provided to the other officials, living in the welfare state; Pakistan.
- P) That the Appellant has been serving till date with utmost zeal and zest with due honesty but the Respondents owing to their personal grudges and malafide intention and ulterior motives two different inquiries were made regarding the same subject matter and the impugned struck off/termination order No. 3897-3906 dated 01/09/2022 is liable to be struck down.
- Q) That the illegal and unlawful actions taken by the Respondents by making time and again inquiry committee is the manifestation of law of jungle, finding no parallels in the service code, which is arbitrary and whimsical, hence liable to be set at naught.
- R) that the Apex Court in the reported case "2020 SCMR 188" held that:

"It is well settled and established law, that whenever a right has been accrued to the employee and he has

(D)

received the benefits of the same and later on it has been rescinded by the authority, it would be ineffective upon the rights of employee. Further the principle of estoppel would be applicable in the present case against the department from recovering the emoluments and benefits of BPS-15 from the petitioner, petition for leave to appeal was converted into appeal and allowed".

- S) That the inactions and omissions of the Respondents qua the Appellant has no legal backing and as such is a nullity in the eyes of law and as well as on the rights and liabilities of the Appellant.
- That the illegal and unlawful conduct of the Respondents by issuing three inquiry committees is stigma on the professional unblemished career of the Appellant and is beyond the mandate and constitutional command and parameters set by the law.
- U) That when once the matter had been settled down by initiating different inquiries, meaning thereby that the matter is said to be closed and past transaction, therefore, the impugned order dated 01/09/2022 is nothing but nullity in the eyes of law.
- V) That in fact for the redressal of the grievance, the Appellant has filed departmental appeal but the worthy RPO Bannu even did not issue any show cause notice and deaf ear to the departmental appeal of the Appellant and kept the same in the cold storage and finally having no other option to put his grievance in the mercy of this Hon'ble Tribunal.
- W) That the counsel for Appellant seeks permission to rely and advance additional grounds at the time of hearing of this petition.

PRAYER IN APPEAL:

In view of the above stated reasons and others to be stated at the time of arguments; it is therefore, most humbly prayed, that on acceptance of this service appeal, this Honourable Tribunal may very graciously be pleased to set-aside the impugned struck off order No. 3897-3906 dated 01/09/2022, being illegal, unlawful, unconstitutional, void-ab-initio, nullity in the eyes of law, against the rights of the Appellant and further reinstated the Appellant into service in his actual rank i.e. Assistant Sub Inspector (BPS-11) with all back benefits. And Grant any other remedy in the circumstances by this Honourable Tribunal to meet the ends of justice.

APPELLANT

THROUGH

YASIR RAUF WAZIR ADVOCATE HIGH COURT BANNU

(M.A, LL.B, LL.M IL (IIUI) Cell # 0332-9745361

Dated: 14/12/2022

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service	Annaal	No	/2022
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Muhammad Tahir

VS

Provincial Police Officer KP & others

LIST OF BOOKS:

- 1) Constitution of Islamic Republic of Pakistan, 1973.
- 2) Civil Servant Act, 1973.
- 3) Police Act, 2017.
- 4) Government Servants (Efficiency & Discipline) Rules, 2011.
- 5) Case Laws according to need.

CERTIFICATE:

As per information furnished to me by my client (Appellant), it is certified that no like such service appeal on the subject matter has ever been moved by the appellant before this Honourable Tribunal.

APPELLANT

THROUGH

YASIR RAUF WAZIR ADVOCATE HIGH COURT BANNU

(M.A, LL.B, LL.M IL (IIUI) Cell # 0332-9745361

Date: 14/12/2022



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. /2022

Muhammad Tahir

VS

Provincial Police Officer KP & others

AFFIDAVIT

I, Muhammad Tahir S/o Khushdil khan R/o Mattaki Bizen Khel, Tehsil & District Bannu, Presently working in Police Department Sub Division Wazir Bannu, do hereby solemnly affirm and declare that all the contents of this service appeal are true, correct and to the best of my knowledge, belief and nothing have been concealed from this Honourable Court.

DEPONENT

CNIC # 11101-1461003-3

21/2



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No	. Å	/2022
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Muhammad Tahir

VS

Provincial Police Officer KP & others

APPLICATION FOR SUSPENSION OF THE OPERATION OF THE IMPUGNED STRUCK OFF ORDER NO. 3897-3906 DATED 01/09/2022 ISSUED BY RESPONDENT NO.05, TILL THE FINAL DISPOSAL OF THIS SERVICE APPEAL.

Respectfully Sheweth:

- 1. That the above noted service appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.
- 2. That the Appellant has got good prima facie case in his favor and is sanguine about its success.
- 3. That the balance of inconvenience also lies in favor of the Appellant.
- 4. That if the impugned reversion order No. 3897-3906 dated 01/09/2022 issued by Respondent No.05 (District Police Officer Bannu) is not suspended, the Appellant would sustain an irreparable loss, and very purpose of the instant service appeal would become frustrated.
- 5. That the facts and grounds of the service appeal may kindly be read as an integral part of this Application.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned reversion order No. 3897-3906 dated 01/09/2022 issued by Respondent No.05 (District Police



Officer Bannu) may very kindly be suspended, till the final disposal of the service appeal.

APPELLANT WWW

THROUGH

YASIR RAUF WAZIR ADVOCATE HIGH COURT BANNU

(M.A, LL.B, LL.M IL (IIUI) Cell # 0332-9745361

Date: 14/12/2022

AFFIDAVIT

I, Muhammad Tahir S/o Khushdil Khan R/o Mattaki Bizen Khel, Tehsil & District Bannu, Presently working in Police Department Sub Division Wazir Bannu, do hereby solemnly affirm and declare that all the contents of this application are true, correct and to the best of my knowledge, belief and nothing have been concealed from this Honourable Court.

DEPONENT

CNIC # 11101-1461003-3

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اس منحہ کے مندرجہ کم از کم پانچ سال بعد نصد بق ہوتا شرور کی ہیں اور نمبر 19ور نہ میں وستی اس کے بینچ تاریخ لکھنی جا بیجے۔ انگیول کٹانات کے لئے ہر پانچ سال کے بعد نصد ان کی ضرورت نہیں۔

6 It officiating Whether Other state.
(i) substantive Substantive Additional emoluments Signature of Pay in Date of (i) substantive appointment of (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb) Volume ii falling under the of officiating government substantive pay for any whether permanent or appointment: position. officialting servant Name of Post term pay temporary تنخواه بطور عارضي لما زمت عارضي مستقل تارخ تقرري زا ند تنخواه وسنخط آگر عارضی ہے تو بطور قائم مقام وارجدمأ أزمستنها مرکاری ملازم رول کے مطابق پینشن کا مستختی ہے؟ الاو^{نن} Rs. Rs. 3

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT.

NOTIFICATION

Peshawar dated the, /6//0/2020

No.SO(Police)HD/SMY 2019 Merged Area/ 24/n-20 In pursuance of the provisions contained in section 5 of the Khyber Pakhtunkhwa Khasadars Force Act. 2019 (Khyber Pakhtunkhwa Act No.XXXIV of 2019) read with rule 3 of the Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Khasadars Force of Wazir Sub-Divison in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

\S.	# Name and Father's Name	i Daniera Danie	
1.	- The same same a same a same	Previous Rank	Rank in which Absorbed
2.		Subedar	Sub Inspector (BPS-14)
3.		Naib Subedar	Sub Inspector (BPS-14)
4.			ASI (BPS-II)
5.	Muhammad Taher s/o Khush Dil Khan	Nuib Subedar	ASI (BPS-11)
6.	The Paris of the P	Naib Subedar	ASI (BPS-11)
7.	Noor Muhammad s/o Awal Khan	Hawaladar	Head Constable (BPS-9)
\$.	Irfanullah s/o Mirmat Khan	Hawaladar	Head Constable (BPS-9)
9.		Hawaladar	Head Constable (BPS-9)
10.	Muhammad Luquan s/o Muhammad Ali Khan Muhammad Khan s/o Lailoon	·	Constable B-II (BPS-7)
11.		Naik	Constable B-II (BPS-7)
12.	Naeem Khan s/o Maghizullah	Naik	Constable B-II (BPS-7)
	Mujtaba Khan s/o Waheedullah Khan	Naik	Constable B-II (BPS-7) 275
13.	Nimat Ullah s/o Sayed ur Rehman	Khassadar	Constable (TEP2 Tex
14.	Salam Noor s/o Sartaraz Khan	Khassadar	Constable (BPS-7)
<u> 15.</u>	Haleem Ullah s/o Mula Dad Khan	Khassadar	Constable (BPS-7)
16.	Najib Ullah s/o Habib Gul	Khassadar	Constable (BPS/7) (8 15/1)
17.	Muhammad Roman Khan s/o Dilnawaz Khan	·	
18.	Khatir Khan s/o Tika Khan	Khassadar	Constable (1318) 700 12
19,	Hazrat Umer s/o Mubarak Khan	Khassadar	Constable Property
20.	Khalid Khan s/o Fazal Rehman	Khassadar	Constable (1388-388) Constable (1388-388) Constable (13887)
 ; -		Khassadar	
7,	Murtaza Khan s/o Taj Malik Khan	Khassadar	Constable (BPS-7)
	Allah Noor s/o Resham Ali Khan	Khassadar	Constable (BPS-7)
	Saleh Jan s/o Qismat Khan	k'hana k	Constable (BPS-7)
	Shakir Ullalı s/u Shamyor	Khassadar	Constable (BPS-7)
25. 15		Knassadar	Constable (BPS-7)
26 11	Wali Rehman s/o Landavi	N 1545 August 1	Constable (BPS-7)
* .	11 /	1.1	- vinamino (D) 0-//

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	r e	Name and Father's Name	Brevious Rin	
	4 5	11-2 Mulammad Raza s/o Hayar 1011 de 1111	Khasandar	
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į	3 . i	(infamin s/o Khurshid Ali	Klinssadar	Constable (1105.7)
Ċ	1 1	Sami allah Khan s'a Sarasah Khan	Klimmahar	Consuble (1108-7)
1	1-11-1	Strain Walish Police Klun	Klimandar	Consuble (BPS-7)
-	4	1 1 mer Sadio s'o Ata Illah Jus		Constable (BPS, 7)
i	\$ - h	- Mali Ullah sa Munayar Khan	Klimsadar	Consuble (11125-7)
N.	i [-	- Managamuad Nawaz Khan sha tiid Masian	Klinsaular	Constable (BPS-7)
j	1 /-	- Company Khan	Klussadar	Constable (BPS-7)
ji T	1 -	.vo. main Ollah s/o Nasib Khap	Klimssadar	Constable (BPS-7)
ŗ	·: /··	Noor Aman Illah s/o Abel Khao	Khassadar	Constable (BPS-7)
į.	, ,	25. Nunanimad Sajad So Dilawer Klass	Khassadar	Constable (131'S-7)
i.	7	. Smith Zeb Khan s/o Mir Daraz Khan	Khussudar	Constable (BPS-7)
j	,	to. 1 Pazai Raliman s/o Tati Raliman	Khassadar	Constable (BPS-7)
ï	, , , , , , , , , , , , , , , , , , , ,	et Icadmaz Khan s/o Azad Khao	Khassadar	Constable (BPS-7)
).		2. Suleman khan s/o Adii 150	Khassidar	Constable (BPS-7)
٠.	ै नः	3. Sheran Ullah s/o Muhammad Ullah	Klibssndar	Constable (BPS-7)
	4.	4. Akher Zaman s/o Sher Zaman	Khassadar	Constable (BPS-7) 4.4
•	45	Akhtar Wali s/o Umer Ali	Khassadar	Constable (BPS-7)
1* }	46	Minadullah s/o Hayatullah Jan	Khassadar	Constable (BPS-7)
i	47	Abud I Illah ala Datah ah	Khassadar	Constable (BPS-7)
ţ	. 48.	- 1. 1000 Onnii S/O Dillinder Nappe	Khussadar	Constable (Dica-7)
j	19	- International State of the Land	Khassadar	Constable (BPS-7)
1	50.	The Charles of Shakha land	Khassadar	Constable (BPS-7)
*)———	- Lawrence of the State of the	Khassadar	Constable (BPS-7)
•	51.	Rasool Wali s/o Mir Dalat Khan		Constable (BPS-7)
1	52.	Tawab Ullah s/o Wali Ullah	Khassadar	Constable (BPS-7)
ï	53.	Ashraf Khan s/o Gulap Khan	Khassadar	Constable (BPS-7)
į,	5.1.	Hidayat Ullah s/o Suleman	Khassadar	Constable (BPS-7)
1	55.	Salim Khan s/o Mir Daraz Khan	Khassadar	Constable (BPS-7)
1	56.	Mulinmmad Bilal s/o Zer Adam Khac	Khassadar	Constable (BPS-7)
1	57.	Abdullah s/o Noor Wali Khan	Khassadar .	Constable (BPS-7)
	58.	Hacen Mahmand - A A L	Khassudar	Character 1 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
+	59.	Hassan Mehmood s/o Muhammad Shafiq	Minssylnr	
-		Nasir Ahmad s/o Wali Zar Khan	Huskadar	
-	60.	Wajid Rahman s/o Abdul Ghafuor	Klyskedar Kledishdar	Constable (BPS-7)
L	61.	1 14001 Shadillan S/O Madaroon Khan : \ \ \Pi	-	Constable (BPS-7)
Ŀ	62.	1 Marian mod Dai 101	Khulmadar	Constable (BPS-7) · Policy
[-	63:	Colore Zomon = (- Dis	wh Fishdar	Constable (BPS-7)
_	64.	Nek Muhammad s/o Aman Ullah	Classadar	Constable (BPS-7)
		County of 101	voassadar	Constable (BPS-7)
	95. [Sayed an Khan 5/0 Zakim Khan	वीassádar\ (Constable (BPS-7)
	65.	County of 101	obassadar	Coi

2. The above absorption shall be subject to the following terms and conditions:

(i) Their services shall be governed under the Khyber Pakhtunkhwa Police.

Act, 2017 and the rules made thereunder.

A member shall not be entitled for absorption, if he has resigned from Khasadar Force Service or has been terminated from the Service ibid on account of misconduct, in efficiency or any other grounds or has been retired from Service under the Khyber Khasadars Rules-1950 and Khasadars Service Rules-2011, before commencement of the Khyber

y

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Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No.

(iii) Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

(iv) Their seniority shall be determined in accordance with rule 6 of the Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.

(v) They shall undergo training as provided in rule 5 of Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

Secretary
to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department

No. & date even.

CC to:

1. Inspector General of Police, Khyber Pakhtunkhwa.

2. Accountant General Khyber Pakhtunkhwa.

3. Regional Police Officer, Bannu

4. District Police Officer Bannu

5. Deputy Commissioner Bannu

6. PS to Chief Secretary Government of Khyber Pakhtunkhwa

7. PS to Secretary, Horne & TAs Department, Khyber Pakhtunkhwa.

8. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa.

9. PS to Secretary Establishment Department, Khyber Pakhtunkhwa

10. Manager Printing Press for notifying the same, in the official gazette.

11. Office record file.

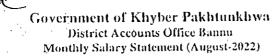
oction Officer (L&R)
Home & TA'S
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J Section Officer (Levies &

vies & Khasadars)

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Personal Information of Mr MUHAMMAD TAHIR d/w/s of KHUSHDIL KHAN

Personnel Number: 00969407

CNIC: 1110114610033

Date of Birth: 25.07.1990

Entry into Govt. Service: 01.04.2021

Length of Service: 01 Years 05 Months 001 Days

Employment Category: Active Temporary

Designation:

Payroll Section: 001 - 3

DDO Code: BU4507-Law & Ordewr Bannu (SD) **GPF Section: 001**

GPFA/C No:

GPF Interest Free

GPF Balance:

21,930.00 (provisional)

Vendor Number: -

Pay and Allowances:

- Pay scale: BPS For - 2022

Pay Scale Type: Civil.

BPS: 11

Pay Stage: I

Wage type	Amount	1.	Wage type	Amount
0001 Basic Pay	19,960.00	1001	House Rent Allowance 45%	2,778.00
210 Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
547 Ration Allowance	681.00	1567	Washing Allowance	150.00
646 Constabilary R Allowance	300.00	1902	Special Incentive Alownee	775.00
1168 Fixed Daily Allowance	2,730.00	2314	Risk Allow Police - 2021	6,707.00°
2347 Adhoc Rel Al 15% 22(PS17)	2,018.00			0.00

Deductions - General

Temp. Address:

Cuy:

Wage type	Amount	Wage type	Amount
3011 GPF Subscription	-1,290.00	3530 Police wel:Fud BS-1 to 18	-399.00
4004 R. Benefits & Death Comp:	-600.00		0.00

Deductions - Loans and Advances

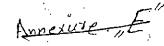
Loan	Descrip	tion	Principal amo	ount	Deduction		Balance
Deductions Payable:	- Income Tux 0.00 Recovered	Fill AUG-2022:	0.00 Exer	npted: 0.00	Recov	verable:	0.00
Gross Pay (Rs.): 40,455.00	Deductions: (Rs.):	-2,289.00	Net Pa	y: (Rs.):	38,166.00	•
Account No	e: MUHAMMAD TAHIR imber: 274649541 ls: UNITED BANK LIMIT	TID, 210285 CHK BAZ	ZAAR CHK BAZA	AR,			
Leavés:	Opening Balance:	Availed:	Earned:		Balance:		:
	·						
Permanent City: BAN		Domicile: -		•	Housing St	atus: No O	fficial

Email: tahirkhanw59@gmail.com

System generated document in accordance with APPM 4.6.12.9(109093/25.08.2022/v3.0)

* All amounts are in Pak Rupees

* Errors & amissions excepted (SERVICES/01.09.2022/00:03:53)



OFFICE OF THE DISTRICT POLICE OFFICER, BANNU.

Phone No: 0928-9270038

Fax No:

0928-9270045

Dated: 6-108/2021."

No.

The Assistant Inspector General of Police, .

Training, Khyber Pakhtunkhwa, Peshawar.

Subject:

03 MONTHS BASIC POLICE TRAINING FOR UPPER SUBORDINATES OF

Memo:

Kindly refer to your office Memo: No. 6810-22/Trg, dated 09-08-2021 on the

subject cited above.

List of 24 untrained Upper Subordinates Police personnel Levies/Khasadars) is submitted herewith on the prescribed format as,

desired, please.

List of 24 untrained Upper Subordinates Police personnel:

District Police Officer, ∕∫ Bannu.

Copy of above is submitted for favor of information to the Regional Police Officer, Bannu Region, Bannu w/r to his office Endst: No. 2920-22/EC, dated 09-08-2021,

District Police Officer,

Ely)

	•,	List of Upper Subordinates (Ex-NMDs) Selected for 03 Months Basic Police Training	ordinates (Ex-Ni	MDs) Select	ed for 03 Mont	hs Basic Police	Training			1	
S. No	Mame	F.Name	300	B.No	P.No	· . Edu	DOB	CNIC	District	Mobile	
	Si Britair Khan	Muhammad Noor	24-01-03	<u>s</u>	50237282	NB · ·	02-03-93	1:101-8369409-3	บทกรย/พันธ	Nil	
2	SI Raham Ayar	Payao Sardar	18-04-11	N.	589928	Matric	07-03-84	1:101-3575636-1	SDW/Bannu	Nil	
ر.,	SI Shabid Rebeaun	Unier Zad Khan	21-04-11	Nii .	589625	Middle	01-01-86	22201-5722727-5	SDW/Bannu	N.	•
÷	รี หือกกัก นโจล้	Asad Khan	16-10-20	NI.	959338	B-Tech	11-07-94	1:101-5409359-1	SDW/Bannu	<u> </u>	
5	ksi Shah Zad Khan	Mak Ullah	27-5-77	N.	50252194	Eth	01-01-66	22201-4943691-7	SDW/Bannu	N.	
Ð	ASP HEEF AND STEEN	Amir Hamza	24-08-12	N.	50237746	iOth	30-09-88	::101-7135039-9	SOW/Daneu	NII	
,7	ASI Zahid oʻlab Abad	Mir Sadat Khan	1-7-15	Nil.	50252183	£:h	01-01-92	:2201-4576682-5	SDW/Bannu	N.ii	
53	ASI Act Zada	Maik Shahzada Khan	. 61-10-60	Nil	50507030	МВА	10-5-87	11101-5260494-5	SDW/Bannu	<u>z</u>	
9	as Rewen than	Taor Khan	16-10-20	N.i	959336	8th	01-01-76	32201-4362036-1	SDW/Bannu	Ξ	
10	AS: Mushabid Wadood	Fazal Wadood	9-6-11	NII.	50248710	MA/ILB	04-05-93	11101-8638809-1	SDW/Bannu	N.	
11	AS Sadam Hussain .	Hunar Khan	03-01-21	N.	969404	ΜA	01-02-93	:1201-3783813-7	SDW/Bannu	Z	
:2	AS Hafeer Ur Rahman	Narar Gul	29-3-12	N.	50472641	rën .	03-03-93	11101-8695129-7	SDVV/Bannu	<u> </u>	
13	AS Hamayon Shan	Rawal Khan 🐪	14-10-15	Nil	50236982	. <u>K.</u>	01-01-86	:1101-4809184-9	SDW/Bannu	N	
14.	#S: Hassan Gui	Adam Gul	10-03-93	NI.	50236755	Nã	01-01-66	11101-0817654-1	SDW/Bannu	<u>s</u>	
15	AS: Mokhtar Ullah Khan	Mashat Khan	03-01-19	N:I	50507029	NH.	29-12-94	22201-2224836-9	SDW/Bannu	Ni	
91	AS' Rehmat Ali	Zakim Khan	12-2-08	N)	50236862	N.	01-01-67	11101-1120515-1	SDW/Bannu	3	
17	#St Omeed Khan	hat Khan	18-04-11	N.	590081	Middle	01-01-87	22201-7138150-9	SDW/Bannu	2	
13 .	ASI Hussan-Uh-Moab	Hanif Ullah	13-04-11	N.	589989	Middle	14-03-87	11101-4220459-5	SDW/Bannu	Nil	
51	AS: Fahim Ullah	2ain Ullah	18-04-11	Nil .	589310	กลเสนใด	01-01-88	11101-6228461-9	SDW/Bannu	NI	
20	पशात प्राप्त ४५	Gul Khan	18-04-11	· Ni	590037	Matric	01-01-88	11101-7574563-9	SDW/Bannu	N	
21	AS! Abdus Salam	Khairabat Khan	18-04-11	N.I.	589981	Middle	04-01-88	22201-3415976-5	SDW/Bannu	N;i	
22	AS Ashraf Huseen	Umer Khan	22-04-11	2	589630	Mátric	01-01-86	11101-3243820-7	SDW/Bannu	N.	-
23	AS Muhammad Tahir	Khushdil Khan	16-10-20			Matric	75.07.1990	11101-1461003-3	SDW/Bannu	3	
2-1	ASI Abdullah Khan	Abdul Janan	01-01-04	<u>₹</u>	50237287	FA	01-04-90	22201-5347253-3	SD\V/Bannu	N	

More to \$. 96

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NO. 6230

DEFICE OF THE THE TRICT POLICE OFFICER

BANNU

Plane No: 0928-9270038 Plan No: 0928-9270045

Bushed: 17 / 08 /2021.

Assistant Inspector General of Pelice Training, Khyber Pakhtunkhwa Feshawan

Subject:

Reference to your office letter No. White dated 16-08-2021 on the subject cited above.

The requisite information on the presalibed format is submitted herewith as desired please.

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OFFICE OF THE DISTRICT POLICE OFFICER BANNU

Phone No. 0928-9270038

Fax: No. 0928-9270045

Dated 17/08/2021

No. 6230/

To

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa, Peshawar

Subject:

PROVISION OF DATA OF HCs/ASI & SUB INSPECTOR OF NMDs

Reference to your office letter dated 16/08/2021 on the subject cited above. The requisite information on the prescribe format is submitted herewith as desired please.

_ _	1		F.Name	DOB	Edu	Date of Home & TAs	Category
SNO	Rank	Name	F.Ivaille			Deptt: Absorption	
				<u>!</u> :	,	Notification	
	<u></u>	Umair Khan	M. Noor	7.3.84	Matric	18-2-2020	Khasadar
1	SI	Raham Ayaz	Payao	1.1.86	Matric	18-2-2020	Levies
2	SI	Kallalli Ayaz	Sardar		i.		
3	SI	Shahid	Umer Zad	5.4.71	FA	18-2-2020	Levies
		Rehman			<u> </u>		141 1-0
4	SI	Gohar Khan	Gul Noor	4.6.95	FA	18-2-2020	Khasadar
5	SI	Wali	Gulil	1.1.01	10 th	18-2-2020	Khasadar
5	51	Rehman	Khan				
6 .	SI	Naeem	Munawar	11.7.94	B. tech	16-10-2020	Khasadar
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		12.	ASI		1	ah	14-03-87	Middi e	31242 AUDIO	36-yr	15-02-2020	Levies	-		
1		1 i2	ASI	Fahim Ull	lah Zain Ullah		01-01-88	Middi e	22 Vice dimina	(ilo)	18-02-2020	Levies	-	<u> </u>	
在 的态度		1231.	ASI ,	Abid Ullah	Gut Khan		01.01.88	yletric	LUID-UMSG		15-02-2020	Levies		-	
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		.b.	201 1	Ashraf Huseen	Umar Khan		01.01.86	atrīc	11101-2203000	.00	15-02-2020	Levies			
				Zahid ullah khan	Mir sada Khan	at cr	01.01 0	th !	222502-45 RESIDEN	Total Control	18-02-2020	-	Khasadar		_
	37.		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	sif Zada	Malik Shahzada Khan	10-5-87	ME	BA .	12101 Szétenjaja	.03	12-02-2020	-	Khasadar		
	J.P.	. A	SI Ri	zwan nan	Taar Khan	01-01-76	8:1	1 2	: : : :7201-4362::::-::::	12.3	16-10-2020		Khasadar		-
	39.	AS	.: Hil	mat ah	Gul Tar Ali Khan	01-01-89	12t/	1	1101.9175 <u>175</u> .t	Gr.	15-10-2020		 ¿: Khasadar		
	25	AS	Mu Wai	shahid dood	Fazal Wadood	04-05-93	iviA/L		101-8538503-r	06	03-01-2021		Khusadur		
	21.	ASI	Sada Huss	em i soin H	lunar Khan	01-02-93	MA	112	201-8753%13-7	10	53-01-2021	- ' k	Chasadar		
2	5	ASI	Hafiz Rehm	P	azar Gul	03-03-93	MA	1110	01-2695129-7	5 7	GS-01-2021	- KI	hasault	ag	うなが
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26-Levies 18-2-2020 16 Middle 1.1.87 Azat Khan Omeed ASI Levies 18-2-2020 Middle 14.3.87 Hanif ASI Hussan 11 Ullah Levies 18-2-2020 Middle 1.1.88 Zain Ullah Fahim ASI 12 Levies 18-2-2020 Matric 1.1.88 **Gul Khan** Abid ASI 13 18-2-2020 Levies Matric · 1.1.88 Khairabat **Abdus** ASI 14 Salam Levies 18-2-2020 Matric 1.1.86 Umar Ashraf-**ASI** 15 Khan Khasadar 8th 18-2-2020 1.1.92 Mir Sadat **ASI** Zahid 16 Khasadar 18-2-2020 **MBA** 10.5.87 Shahzada Asif ASI 17 Khasadar 8th 16-10-2020 1.1.76 Taar Khan Rizwan **ASI** 18 Khasadar 16-10-2020 12th Gul Taar 1.1.89 Hikmat **ASI** 19 Khasadar 08-01-2021 MA/LLB 4.5.93 Mushahid Fazal -**ASI** 20 Wadood Wadood Khasadar 08-01-2021 MA 1.2.93 Hunar Sadam ASI 21 Khan Hussain Khasadar 08-01-2021 MA 3.3.93 Nazar Gul Hafiz AS1 22 Rehman Khasadar 08-01-2021

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		Abdullah Ehan	Abdul Janan 24,66	F.	A 2	2201-55-6825-6-1-	91 6	8-01-2021			
	3.	AST Rehmat Ali	O1-01-67	Sth	11	101-1130505.7		-01-2021		Khasadar	
	30.	5) Muhammad Kh	ushdil Khan	FA -	· ·	11-11-6:00:0: 1:			- K	hasadar .	
	31. ASI	Həjj Ali Aəir	30-69. 88	10th)5 16-	10-2020	- Kh	asadar .	
	32. HC	Faqir ur Rehman Noor	. 0		11101	-7135033 p	18-0:	3-2020	. Kha	sadar .	
	33. HC	Hafiz Ullah Khan Umar K		Nil	22201-	32	18-02-	2020	Khas	1	
	34. HC	Muharamari	7-91		11101-47	11495-1 19	18-02-2	020	Khasad	iar	
		Zahir Shah	01-01-73	il.: 1:	1101-851	3954-5 25	18-02-20	20	Khasadi	nr .	
	SS. HC G	bdul . Abdul Jaba	01-01-64 Nil	11]	101-1529	\$14·1 ₁₇	18-02-2020		Khasadai		
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25	ASI	Shah	Akhtar	15.4.82	8 th	08-01-2021	Khasadar
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26	ASI	Javid Iqbal	Dawood	1.1.75	8 th	08-01-2021	Khasadar
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27	ASI	Mukhtar	Mashat	29.12.94	ВА	08-01-2021	Levies
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28	ASI	Abdullah	Abdul	1.4.90	FA	08-01-2021	Levies
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29	ASI	Rehmat Ali	Zakim	1.1.67	8 th	08-01-2021	Khasadar
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30	ASI	Muhammad	Khushdil	25.7.90	FA	16-10-2020	Khasadar
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31	ASI	Hajj Ali Shah	Aaimar	30.9.88	10 th	18-02-2020	Khasadar
			Hamza				
32	НС	Faqir ur	Noor Ali	1.1.64	Nil	18-02-2020	Khasadar
		Rehman	· .				
33	НС	Hafiz Ullah	Umar	15.7.91	Nil	18-02-2020	Khasadar
		Khạn	Khan				
34	НС	Muhammad		1.1.73	Nil	18-02-2020	Khasadar
		Zahir Shah					
35	НС	Abdul	Abdul	1.1.64	Nil	18-02-2020	Khasadar
		Ghaffar	Jabar		÷		
36	HC	Khalil Khan	Shah	3.4.91	FA	18-02-2020	Khasadar
			Bataz				
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37	НС	Muhammad	Zar Wali	1.1.83	Nil	18-02-2020	Khasadar
		Amin	Khan				
38	HC	Sabo Khan	Eid Khan	Jan-70	Nil	18-02-2020	Khasadar
39	HC	Samin Ullah	Sultan Jan	1-1-85	9 th	18-02-2020	Khasadar
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	42.	Н	C Barkat Ullah	Pir Zad	Khan	01.01-57	 Püt	The control of the co	7.79	14	18-02-20	20	Klusada	
	43.	110	Hoor A:	tim Mir Nawaz	· Haq	20-1-80	8th	i ser anni,		12	13-02-202	0	Khasadar	
. ,	44.	НC	Farhat Ullah	Sher r Khan	Nawaz	17,04-87	۴A	11131-675,00	· #	IIII	15-02-2026)	Khasadar	
	45.	нс	Mushfaq	Nizam Khi	au.	19-04-88	atric .	11101-6070666			18-02-2020	Levies		
4	6.	НC	Amir Ullah	Muhamma Gul	ıd	ا د	iddi c	11101-907-81218		12	13-02-2020	Levies		
47), 	HC .	Gul Azim	Mir Nawaz	Haq of-of-dy	e M	A	22202-0334320	9	110	18-02-2020	Levies	-	
48.		HC .	Rehman Ali	Awal Rahma	09-01-89	Mid e	1 7	1101-9473045		11.20	13-02-2020	Levies		
49.			M.Ibrahim	Noor Ali	15-01-89	Matr		: 1101-8415246-7		77	18-02-2020	Levies		
50.	}		Sherman Ullah	Karamat Khan	02-03-89	FA	11	101-3445707-3			3-02-2020	Levies'		
51.	Н	C A	ahmat yaz	Toor Ali	15-03-89	Matric	111	01-7038421-7			3-02-2020	Levies		
52.	НС	. Sa	ad Uliah	Nasrullah Jan	26-04-89	Middl e		21-3347409-7		13	-02-2020	Levies	-	
53.	HC.	Abo		her Azəm	61-01-90	Middl . e	1110	1-6202:70-5	E T	13-	02-2020	evies		
14.	нс	Ama	in Ullah SI	ner Wali . nan .	01-01-90	Matric	1) 101	-2552336 1	ts:	12-0	Ž-2020 L	evies	15/12	

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41	НС	Abdullah	Khwazha	1.1.84	10 th	18-02-2020	Khasadar
		Khan	Khan				
42	НС	Barkat	Pir Zad Khan	1.1.87	Nil	18-02-2020	Khasadar
		Ullah		,			
43	НС	Noor Azim	Mir Haq	20.1.80	8 th	18-02-2020	Khasadar
,	,		Nawaz		11		
44	НС	Farhat	Sher Nawaz	17.4.87	FA	18-02-2020	Khasadar
		Ullah	Khan		,		
45	НС	M. Ishfaq	Nizam Khan	19.04.88	Matric	18-02-2020	Levies
46	НС	Amir Ullah	Muhammad	10.9.88	Middle	18-02-2020	Levies
			Gul	<u>.</u>		,	
47	НС	Gul Azim	Mir Haq	1.1.89	MA	18-02-2020	Levies
1 .			Nawaz				
48	НС	Rehman Ali	Awal	9.1.89	Middle	18-02-2020	Levies
			Rehman				
49	НС	M. Ibrahim	Noor Ali	15.1.89	Matric	18-02-2020	Levies
50	НС	Sherman	Karamat Ali	2.3.89	FA	18-02-2020	Levies
		Ullah					
51	НС	Rahmat	Toor Ali	15.3.89	Matric	18-02-2020	Levies
		Ayaz			-		
52	НС	Saad Ullah	Nasrullah	26.4.89	Middle	18-02-2020	Levies
		Jan	Jan				<u> </u>
53	НС	Sher	Sher Azam	1.1.90	Middle	18-02-2020	Levies
		Abdullah					
54	НС	Aman Ullah	Sher Wali	1.1.90	Matric	18-02-2020	Levies
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		55.	HC.	Wali Muhemmad	Mir Zaman		14-05-90	//atric	11105-90518	05-9	. 19	. 18-02-2020	Levies		
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	5	7.		famid Chan	Abdul Rashid		21.03.91	atric	12402-255055	2.5	21	18-02-2020	Levies	-	
	5	5.	HC KI	amood han	M. Sharif	0.00	01.01 M.	ntric	11101-236074	1.5	22	18-02-2020	Levies	: .	
	55		יט	hmad Ilah	Asmat Ullah	76-04-07	Ma	tric	11101-7-267-27	9	. 23	18-02-2020	Levies	· -	
	CO.			ander an	Abdul Jabar	09.03.92	N		11101-75191117	3	25	18-02-2020	Levies	_	
	61.	l l		ush shamma	Mehar Dil	15.03-52		77	1 502-33 c45.63.	ц	25	18-02-7020	Levies	•	
	62.	н	C Sha		Abdul Ghafor Ali	03 00 82	!viat;		2701 <u>-1434669</u> .3	3	7.6	18-02-2020	Levies		
	63.		d d	A Company	Dost Muhammad	01-01-88	100	N	2201-4 52 +344-1	1	13	8-02-2020		hasadar	
	54.	нс	Shah Ullah	id j	oula Band	01-01-88	FA	22	201-878-963. J	10	0 18	3-02-2020	K	hasadar	
6	5.	нс			ar Khan	06-04-84	10tl:	27.	201-5017005-T	13	15	-02-2020	- Kh	asadar	
G	* :	нс	.]	Jilah Mi	ir Nat Khan	01-01-94	Sth	111	0 2-258(180-):	CZ	18-	02-2020.	- Kh:	sadar	
67		нC	Gul Zai	. Jan	uhammad .	01-01-86	Nii	221	02-1-200-85-3		13-0	72-2020	- Kha	sadar	
58.		нс	Noor S	adiq Noc	or Alam	01-01-89	8th	2270	12-925-247-5	(30) (30)	45.0	2-2020	Khas	edar .	
69.		нс	Rabim Ullah	Zan	na Jan	01.01.89	NU	23162	E-204 99 05: 9	its.		-2020	Nha:	UC 35	

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55	НС	Wali	Mir Zaman	14.5.90	Matric	18-02-2020	Levies
	-	Muhammad		•	. '		
56	НС	Arman Khan	Haq Dad	20.5.90	Middle	18-02-2020	Levies
57	HC	Hamid Khan	Abdul	21.9.91	Matric	18-02-2020	Levies
J.,			Rashid				
58	НС	Samood	M. Sharif	1.1.92	Matric	18-02-2020	Levies
	•	Khan	ā :				
59	HC	Ahmad	Asmat Ullah	8.04.92	Matric	18-02-2020	Levies
		Ullah	. '		<u> </u>		
60	HC	Sikandar	Abdul Jabar	9.3.92	Matric	18-02-2020	Levies
	110	Khan					
·	1		Mehar Dil	15.3.82	FA	18-02-2020	Levies
61	HC	Khush	IVIERIAL DII	15.5.02	, , , ,		
		Muhammad				10.03.2020	Levies
62	HC	Shad Ayaz	Abdul	3.9.82	Matric	18-02-2020	Levies
		. ,	Ghafar Ali				
63	НС	Naik	Dost	1.1.88	10 th	18-02-2020	Khasadar
		Muhammad	Muhammad		:		
64	HC	Shahid	Gula Band	1.1.88	FA	18-02-2020	Khasadar
		Ullah					
65	НС	Raip Khan	Par Khan	6.6.84	10 th	18-02-2020	Khasadar
		Irfan Ullah	Mir Nat	1.1.94	8 th	18-02-2020	Khasadar
66	НС	Ittali Ullali					
			Khan	4.4.00	NEI	18-02-2020	Khasadar [,]
67	HC	Gul Zaman	Muhammad	1.1.86	Nil	TO-07-2020	
			Jan				
68	НС	Noor Sadiq	Noor Alam	1.1.89	8 th	18-02-2020	Khasadar
69	НС	Rahim Ullah	Zama Jan	1.1.89	Nil	18-02-2020	Khasadar
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	71_	HC.	Said Ullah	Khandan		01-01-93	Nil	Ì	22201-202827	1-3	31	18-02-	2020	-	Kha	sadar
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District Police Officer,

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District Polico Officer,

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	Н		Asim	Sakhi	1.1.89	Nil	18-02-2020	Khasadar
70		١.	Muhammad	Muhammad				
71	Н	C	Said Ullah	Khandan	1.1.93	Nil	18-02-2020	Khasadar
72		C	Riaz Ahmad	Abid Zahid	1.1.94	Nil	08-01-2021	Khasadar
73		IC .	Muhammad	Javed Khan	8.10.97	ВА	18-02-2021	Khasadar
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76	5 F	IC	Tariq Nawaz	Karkar Khan	1.1.00	Nil	16-10-2020	Kilasaudi
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	-		Muhammad	Shaiz Khan	1.1.92	Nil	18-02-2020	Khasadar
78		HC	Irfan Ullah Esa Khan	Azal Khan	1.1.64	Nil	18-02-2020	Khasadar
79	9 1	HC 1	ESA KIIGII	73201 (310)		<u> </u>		1

District Police Officer, Bannu

No. 6231

Copy of above is submitted to the Regional Police Officer, Bannu Region Bannu for information.

District Police Officer, Bannu

y

Capital City Police Officer, Peshawar (for Sub-Division) The

Regional Police Officers, The Mardan, Malakand, Bannu, Kohat & D.I. Khan.

Memo:

PROVISION OF DATA OF HCs/ASIs/SIS & INSPECTORS OF NIMDS

I am directed to refer to the subject captioned above and communicate that the subject details may please be furnished on the following format and sent to this by tomorrow, positively.

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(Dr. Quraish Khan) PSP, PhD Assistant Inspector General of Police Training, Khyber Pakhtunkhwa

No=6974-85 My

Copy of above is forwarded for information and necessary action to the:-

1. District Police Officers, Kohat, Lakki, Hannu, D.I. Khan & Tank for newly merged Sub-Divisions (Ex-FRs).

All District Police Officers of Newly Morged Districts.

(Dr. Quraish Khan) PSP, PhD Assistant Inspector General of Police. Training, Khyber Pakhtunkhova

-) Roller Ay

To

The Capital City Police Officer, Peshawar

The Regional Police Officers, Mardan, Malakand, Bannu, Kohat & D I Khan

Subject: PROVISION OF DATA OF HCs/ASI & SUB INSPECTOR OF NMDs

I am directed to refer to the subject noted above and to communicate that the subject details may please be furnished on the following and send to this by tomorrow, positively.

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(Dr. Qureshi Khan) PSP, PhD

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa

No. 6974-85/Trg

Copy of above is forwarded for information and necessary action to the:

- 1. District Police Officers, Kohat, Lakki, Bannu, D. I. Khan & Tank for newly merged Sub-Divisions (Ex-FRs)
- 2. All District Police Officers of Newly Merged Districts.

(Dr. Qureshi Khan) PSP, PhD

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa

Reference to the subject cited above and your letter No. 6230 dated: 17.08.2021, find the attached list for verification of the data in accordance to Home Department Khyber Pakhtunkhwa Posinivar different notifications. Also fill-up the missing information (Highlighted) in the attached lists. The corrected lists shall be forwarded to the Directorate of Training CPO Peshawar, within 02 days, positively both in hard and soft formats on dsptrgbasic@gmailteomic transmission of the contribution

The mater may please be treated as top priority.

P-103

(Dr. Quraish Khan) PSP, PhD Assistant Inspector General of Police Training, Khyber Pakhtunkhwa

Deputy Inspector General of Police, HQrs Khyber Pakhtunkhwa.

Regional Police Officer, Bannu.

3. PSO to IGP Khyber Pakhtunkhwa.

Por Compliance

(Dr. Quraish Khan) PSP, PhD Assistant Inspector General of Police Training, Khyber Pakhtunkhwa

32-1) F-1 Better OPY
DIRECTORATE OF TRAINING

CENTRAL POLICE OFFICE KHYBER PAKHTUNKHWA, PESHAWAR

No. 7307-10

Dated 03/09/2021

To

The District Police Officer,

Bannu

Subject:

PROVISION OF DATA OF HCs/ASI & SUB INSPECTOR OF NMDs AND

EX-FRs

Memo,

Reference to the subject cited above and your letter No. 6230 dated 17.08.2021, find the attached list for verification of the data in accordance to Home Department, Khyber Pakhtunkhwa, Peshawar different Notifications. Also fill-up the missing information (Highlighted) in the attached lists. The corrected lists shall be forwarded to the Directorate of Training CPO Peshawar within 02 days positively both in hard and soft formats on dsptrgbasic&gmail.com

The matter may please be treated as top priority.

(Dr. Qureshi Khan) PSP, PhD

Assistant Inspector General of Police

Training, Khyber Pakhtunkhwa

Cc:

- 1. Deputy Inspector General of Police, HQs, Khyber Pakhtunkhwa.
- 2. Regional Police Officer, Bannu.
- 3. PSO to IGP Khyber Pakhtunkhwa.

(Dr. Qureshi Khan) PSP, PhD

Assistant Inspector General of Police
Training, Khyber Pakhtunkhwa

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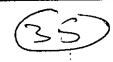
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1 2	Fazal Wadood	Faar Khan Gul Tar Ali Khan	Malik Shahzada Khan	Umar Khan	Sheirabet Khan	Zain Ullah	Hanif Ullah ::	Nemat Khon	Moin Ullah	Father Name
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	01.01.1964 21708-6044306-5		01.01.1992 Nil Nil 11101-6737700-7		11101-5089582-3		01.01.2000 NI 30 11101-5992484-7		22201-3475977-1		BA: 11101-8586503-5
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Page 6 of 6

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OFFICE OF THE

DY; SUPERINTENDENT OF POLICE, CANTT CIRCLE, BANNU.

Phone No: 0928-9270291.			
Nn	· Dated:/	/2024	į

To

Region Police Officer . Bannu Region, Bannu.

Subject.

ENQUIRY

Memo.

Kindly refer to your office order NO.2220/EC dated 10-06-2021. Interim report submitted for your kind perusal please

Dy: Superintendent of Police, Cantt Circle, Bannu

Copy of the above is forwarded to No: 197-200/C off: 30-6-04

- 1. SOPO Ruter II
- 2. Head clerk, SP investigation office

Move to p. 113

Dy: Superintendent of Police, Cantt Circle, Samu

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The Committee comprising of the following officers:-

- (4) Inspector Muhammad Farooq Khan acting SDPO Cantt
 - (2) Inspector Rizwan Khan acting SDPO / Rural-II,
 - (3) Senior Clerk Javid Khan Head Clerk Investigation Office Bannu

was constituted by order of worthy DIG Bannu Region Bannu vide order No. for the purpose of collecting the entire record in respect of all levies and Khassadar personnel of Sub Division Wazir from DPO Office which is originally sent by APA FR Bannu to DPO Bannu, the record which was sent to the PPO KP and sanctioned/ Notified from Home Department.

The committee obtained the following documents/ information/recommendations from DC Office/DPO Office and sanctions from Home Department. The detail is as undèr.

The officer recommend by DC / APA Office vide No. 162- 63 -/APA/LC/F-36 dated 17-10-2019 for purpose of absorption in Police Department.

Subject.

ABSORPTIN OF LEVIS + HASSADAS

Kha	sadar	Levies	Total
Utmanzai	Ahmadzai	· ·	
335	441	245	1021

RECOMMENDATION OF KHASADAR/LEVIES HEAD CONSTABLES AND CONSTABLES FROM DC CEFICE TO DPO BAI INU VIDE LETTER NO.162-63/APA/LC/F-36 DATED 17.10.2019

HEAD CONSTABLES

50

CONSTABLES

TOTAL

950

RECOMMENDATION OF HEAD CONSTABLES AND CONSTABLES FROM DPO BANNU VIDE LETTER NO.13608/PA DATED 25-11-2019

HEAD CONSTABLES

CONSTABLES

TOTAL

950

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.472-82 DATED 18-2-2020 AND 483-93 DATED 18-2-2020

HEAD CONSTABLES

CONSTABLES 793

TOTAL

(las)

(41)

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.2410-20 DATED 16-10-2020 (Service change)

HEAD CONSTABLES

04

CONSTABLES

57 (Service change)

TOTAL

61

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.87-97 DATED 08-01-2021 (Service change)

HEAD CONSTABLES

: . · .

CONSTABLES

= 43 (Service change)

TOTAL

. 44

Grant Total

105

6. <u>DIRECT NOTIFICATION OF CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.691-700 DATED 07-05-2021</u>

HEAD CONSTABLES

Nil

CONSTABLES

31 (Khasadar)

TOTAL

;

7. <u>DIRECT NOTIFICATION OF CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.731-39 DATED 07-05-2021</u>

HEAD CONSTABLES

Nil

CONSTABLES

= 0.1 (LEVIES)

TOTAL

01

SERVICE CHANGE PENDING CASES IN HOME DEPERTMENT, KP

TOTAL

183

9. NEED TO BE ABSORBTION CASES PENDING IN HOME DEPERTMENT, KP

TOTAL

19

CONCLUSION

It is pertinent to mentioned here that interim report in respect of upper subordinate of Levies and Khasadar has already been submitted in the office of RPO Bannu Region Bannu. However, conclusion is reproduced.

Compendium of the above scenario is that the above mentioned police officials from S.No. 01 -10 are recommended as Constable by the Core committee i.e. DPO Bannu, ADC and Distt Account Officer Bannu while Home Dept accorded their names in the rank of ASI. Furthermore the name of Saddam Hussain was not recommended by the Core committee while Home Dept included his name in aforementioned notification as ASI.

Moreover the list / all Notifications mentioned above received from Home Dept need verification.

(Giaco)

OROFF

to compliance with the directions passed by Morthy Regional Police Officer. Bannu Region, Banny vide Endit: Un.56097EC dated 17.11.2621 and in the light of suspicious notification of Gevt; of Khyber Pakhtunkhwa, Home and Tribal Affairs Department vide No. SO(Police) HD 75MI 2019 Merged Area 691-700 dated 07.05.2021 regarding the absorption of 31 Khasadars in Police Force as well as 10 personnel of Ex-Khasadars were notified as ASIs vide notification No. StilPolice) HD /SMI 2019 Merged Area/\$7-97, dated 08.01.2021 from S.Ho.01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide notification IIo. SC(Police) HD /SMI 2019 Marged Area/2410-20, dated 16.10.2070 at 5.No.05 in contravention to the schedule (Rule-3(b)) of KP Khasadar Absorption Rules Act 2019 without reeds to be properly verified from the Home Department Peshawar. The services of all the personnel under notification No. mentioned above are hereby suspended as well as made non-functional till the arrival of proper ventication from Home Department Peshawar with Immediate effect.

OE 115, 1371 Dated 25/ 11/2021

District Police Officer, Bannu.

//dated, Bannu the 25 / // /2021

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office Endst: No. quoted above.

All concerned for necessary action.

District Police Officer. Bannu.

ORDER: 4-1 Better Opy

In compliance with the directions issued by Worthy Regional Police Officer, Bannu Region Bannu vide Endst: No. 5609/EC dated 17.11.2021 and in the light of suspicious notification of Govt: of Khyber Pakhtunkhwa, Home and Tribal Affairs Department vide No. SO (Police) HD/SMI 2019 Merged Area 691-700 dated 07.05.2021 regarding the absorption of 31 Khasadar in Police Force as well as 10 personnel of Ex-Khasadar were notified as ASIs vide Notification No. SO (Police) HD/SMI 2019 Merged Area 87-97, dated 08-01-2021 from S. No. 01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide Notification No. SO (Police) HD/SMI 2019 Merged Area 2410-20, dated 16-10-2020 at serial No. 05 in contravention to the schedule (Rule-3(b)) of KP Khasadar Absorption Rules Act 2019 which needs to be properly verified from the Home Department Peshawar. The services of all the personnel under notification No. mentioned above are hereby suspended as well as made non-functional till the arrival of proper verification from Home Department Peshawar with immediate effect.

OB No. 1371

Dated 25/11/2021

District Police Officer,
Bannu.

No. 8836/dated, Bannu the 25/11/2021

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office Endst: No, quoted above.

2. All concerned for necessary action.

District Police Officer,
Bannu.

y

In compliance with the directions of Regional Police Officer, Bannu Region, Bannu vide Endst: No.5609/EC dated 17.11.2021, a committee comprising of Mr. Rizwan Khan, SDPO Rural Circle-II Bannu and Mr. Javed Iqbal, Head Clerk of this. office is hereby constituted for the purpose to carry out verification of the following notifications received to this office from Home & Tribal Affairs Department, Khybe-Pakhtunkhwa Peshawar regarding absorption of Ex-Khasadar/levies Force in Police:

1. No. SO(Police) HD /SMY2019 Merged Area 2410-20 dated 16.10.2020

2. No. SO(Police) HD /SMY2019 Merged Area 87-97 dated 08.01.2021

3. SO(Police) HD /SMV2019 Merged Area 691-700 dated 07.05.2021(31 individuals)

District Police Offi Bannu

/dated, Bannu the 0// 12/2021.

Copy of above is submitted for favour of information to:

The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.

The Regional Police Officer, Bannu Region, Bannu w/r to his office Er 5609/EC dated 17.11.2021.

The Section Officer Levies & Khasadar, Home & Tribal Affairs De Khyber Pakhtunkhwa Peshawar.

The committee members for necessary action and compliance.

Dietrict Pali

US-D I-1 Better copy

In compliance with the directions of Regional Police Officer, Bannu Region Bannu vide Endst: No. 5609/EC dated 17.11.2021, a committee comprising of Mr. Rizwan Khan, SDPO Rural Circle-II Bannu and Mr. Javed Iqbal, Head Clerk of this office is hereby constituted for the purpose to carry out verification of the following notifications received to this office from Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar regarding absorption of Ex-Khasadar/Levies force in Police:

- 1. No. SO (Police) HD/SMY 2019 Merged Area 2410-20 dated 16.10.2020.
- 2. No. SO (Police) HD/SMY 2019 Merged Area 87-97 dated 08.01.2021.
- 3. No. SO (Police) HD/SMY 2019 Merged Area 691-700 dated 07.05.2021 (31 individuals).

District Police Officer Bannu

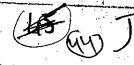
9004-8/dated, Bannu the 01/12/2021.

ORDER

Copy of above is submitted for favour of information to:

- 1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
- 2. The Regional Police Officer, Bannu Region Bannu w/r to his office Endst: No. 5609/EC dated 17.11.2021.
- 3. The Section officer Levies & Khasadar, Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar.
- 4. The Committee members for necessary action and compliance.

District Police Officer
Bannu





GOVERNMENT OF KHYBER PAKHTUNKHWA Home & Tribal Affairs Department

No. SO(Police)HD/SMY 2019/ Merged Area/ /35

Dated: 06.12.2021

District Police Officer, Bannu Sub Division.

Salicot

ORDER

I am directed to refer to your office order No. 9004-8 dated 01.12.2021 and to corvey that the Committee comprising of Mr. Rizwan Khan SDPO Rural Circle-II Bannu and Mr. daved lobal Head Clerk DPO Bannu office visited the office of Section Officer (Levy & Khassadars) Home & Tribal Affairs Department for the purpose. The Committee was provided relevant record pertaining to the below mentioned Notifications and verified the

- No. SD(Police)/HD/SMY-2019/Merged Area/2410-20 dated 16.10.2020.
- No. SO(Police)/HD/SMY-2019/Merged Area/87-97 dated 08.01.2021. 3.
- No. SO(Police)/HD/SMY-2019/Merged Area/691-700 dated 07.05.2021.

Section Officer (Levy & Khassadar)

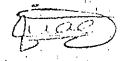
Endst No. & date even. Copy to the:

Regional Police Officer Bannu Region, Bannu.

2. PS to Secretary Home & TA's Department, Khyber Pakhtunkhwa.

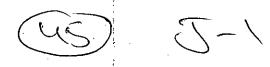
3. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa

Section Officer (Levy & Khassadar)



.eference Attached.

Respected Sir,



In compliance with the directions vide Order Endst:No.9004-8, dated 01.12.2021, we, the committee members visited the Office of Section Officer (Levies & Khasadars) Home and Tribal Affairs Department on 06.12.2021 for the purpose to verify the following suspicious notifications of Home Department regarding absorption of Ex- Khasadars/ Levies force in Police Force.

 No.SO(Police)HD/SMY 2019 Merged Area/2410-20 dated 16.10.2020 (65 individuals) .

 No.SO(Police)HD/SMY 2019 Merged Area/87-97 dated 08.01.2021 (54 individuals)

3. SO(Police)HD/SMY 2019 Merged Area/691-700 dated 07.05.2021 (31 individuals)

The verification process was carried out as follows:

- a) Dispatch register of the office of Section Officer (Levies & Khasadars) Home Department was checked with regard to the numbers issued depicted on the notifications which were found correct.
- b) Every single notification received in this office from the Home Department was comparatively checked by name of individuals as well as their designation/ranks and dispatched numbers which were found correct.
- c) An authentication letter regarding verification of these notifications was also obtained from the Office of the Section officer (Levies & Khasadars) Home Department, placed on file.
- d) Attested photocopies of all the three notifications were also obtained from the Section Officer office (Levies & Khasadars) Home Department, placed on file.

Report is submitted please.

(Javed Iqbai) S.Clerk, Head Clerk to DPO Bannu. (Rizwan Khan) SDPO Rural-II Circle Bannu,

OFFICE OF THE DISTRICT POLICE OFFICER, BANNU.
No. 9366, dated Bannuthe 14-72/20

Copy of committee report is submitted to the Regional Police Officer, Bannu Region, Bannu with regard to the verification of above suspicious notifications from the office of Section Officer office (Levies & Khasadars), Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar alongwith relevant record for perusal and order w/r to his office Endst:No.5609/EC, dated 17.11.2021, please.

District Police Officer.
Bannu.

U

From:

The Regional Police Officer,

Bannu Region, Bannu

To:

The District Police Officer, Bannu

No. 793

/EC, dated Bannu, the 2 3 /02/2022

Subject:

ORDER/VERIFICATION OF SUSPICIOUS NOTIFICATIONS FROM HOME & TRIBAL AFFAIRS DEPARTMENT KP

Memo:

Reference your office letter No.1051/SDW dated 17.02.2022.

After perusal of the case, the Regional Police Chief has recorded the following remarks on it;-

"As they have been lawfully absorbed in Police Department in BS-11 by Home Department, therefore proceed as per law on the subject".

SRC (SPW)

For information &

Maclien.

District Police Officer
BANNU

24/02/2022

(OFFICE SUPDI:)

For Regional Police Officer, Bannu Region, Bannu

ORDER

In compliance with Regional Police Officer, Bannu Region, letter No.793/EC, dated 23.02.2022 and in the light of proper verification carried of the Office of Section Officer (Levies & Khasadars) Govt: of Khyber Pakhtunkhwa, and Tribal Affairs Department vide his office letter No. SO(Police) HD /SMY 2019 /N Area/ 1333-36, dated 06.12.2021 of the suspicious notifications vide No. SO(Police) /SMY 2019 Merged Area/ 691-700, dated 07.05.2021 regarding the absorption Khasadars in Police Force as well as 10 personnel of Ex-Khasadars were notified as vide notification No. SO(Police) HD /SMY 2019 Merged Area/87-97, dated 08.01.202; S.No.01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide notification SO(Police) HD /SMY 2019 Merged Area/2410-20, dated 16.10.2020 at S.No.05, the se of all the personnel under notification Nos. mentioned above are hereby restored as w made functional from the date of suspension i.e. dated 25.11.2021 with immediate effect

OB No. <u>267</u>
Dated 24 102 /2022

District Police Officer, Bannu

Phone No: 0928-9270038.

Fax No: 0928-9270045 Email:dpobannu2@gmail.cor

No. 12 70 -74 /SRC(SDW) dated Bannu the, 25 / 2 /2022.

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office letter No. quoted above.

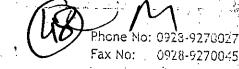
2. All concerned for necessary action.

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District Police Officer, Bannu

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ADDITIONAL SUPERINTENDENT OF POLICE, BANNU

No. 224 / ASP

Dated 24 1.08 12022

. То:

The District Police,

Bannu .

Subject:

PROBE INTO SUSPICIOUS / CONTRVERSIAL NOTIFICATIONS

Memo:

Kindly refer to DPO office order No. 3639-42/SRC/SDW, dated 11.08.2022, on the subject noted above.

Respected Sir,

In compliance with your kind directives, the committee members thoroughly checked the office record of DPO office, Bannu, in respect of the concerned suspicious/controversial induction of individuals of Sub-Division Wazir in Bannu Police and are unanimously agreed upon the following conclusions:

CONCLUSIVE SUMMARY REPORT REGARDING PARA 1:

The induction of 11 officials in the rank of ASIs (BPS-11) consisting of —10 officials vide notification No.SO(Police)HD/SMY 2019 merged Area/87-97, dated 08.01.2021 (from serial No. 1 to serial No. 10) and 01 official (Muhammad Tahir) vide notification No.SO(Police)HD/SMY 2019 merged Area/2410-20, dated 16.10.2020 mentioned at serial No. 5 is totally wrong, fake and forged (Though verified from the Home and Trible Affairs Department as true) on the following grounds:

1. Neither the DPO office Bannu had sent/recommended the under-discussion ill names of individuals of Khasadar Force of Wazir Sub-Division for their absorption in the Rank of ASI (BPS-11) nor their names had been recommended by the DC/APA office, Bannu for their absorption in the rank of ASIs. Some hidden hands of the CPO clerical staff and Home Department with mutual contivence and mala-fide intention have included these (11) names for their (illegal, illogical and irrational) absorption in the rank of ASIs. Similarly, no scrutiny committee (comprising DPO, DC/AC/APA & DAO) had recommended these names for their absorption in the rank of ASIs. Perhaps the hidden hands have also prepared their fake scrutiny committee reports bearing take signatures of the committee-members for giving it a legal coyet.

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AS THAT



- iii Shah Hussain S/O Akhtar Munir on serial No. 225 and his absorption in the rank of Constable (BPS-07);
- iv Mukhtar Ullah Khan S/O Mashat Khan on serial No. 301 and his absorption in the rank of Constable (BPS-07);
- v Javid Iqbal S/O Dawood Khan on sorial No. 312 and his absorption in the rank of Constable (BPS-07);
- vi Hafeez ur Rehman S/O Nazar Gul on serial No. 596 and his absorption in the rank of Constable (BPS-07);
- vii 'Mushahid ul Wadood S/O Fazal Wadood on serial No. 600 and his absorption in the rank of Constable (BPS-07);
- viii Rahmat Ali S/O Zakim Khan on serial No. 612 and his absorption in the rank of Constable (BPS-07);
- ix Zar Ali S/O Mir Qazi Bat Khan on serial No. 245 and his absorption in the rank of Constable (BPS-07) (service changed with Muhammad Tahir S/O Khusdil Khan).

Note: This list also does not bear the name of Saddam Hussain, at all, because he is/was-not even a member of Khasadar, Levy or Police Force.

4. After that a notification No.SO(Police)HC/SMY 2019 Merged Area 2410-20, dated 16.10.2020 was received from Home and Tribal Affairs Department which wrongly bears the name of Muhammad Tahir S/O Khushdil Khan on serial No. 5 and his absorption in the rank of ASI (BPS-11) (copy attached) as the DPO office had not recommended his name for his absorption in the rank of ASI. Muhammad Tahir is neither a member of Khasadar Force/Levy Forcenor Police Force. The above mentioned facts had already been communicated to CPO vide DPO office, Bannu, letter No. 13924 dated 28.10.2020 (copy attached) but in vain. He is an outsider and has managed his induction in Police Force as ASI through back doors. He is also involved in forgery and cheating. For giving legal cover to his illegal gotten Police service vide notification mentioned above dated 16.10.2020, he managed his service change with one Zar Ali S/O Mir Qazi Bat Khan after 04 days i.e on 20.10.2020. The service of Zar Ali has already been terminated vide DPO office, Bannu, letter No. 3639/SRC/OHC SDW, dated 29.04.2021 (copy enclosed).

CONCLUSIVE SUMMARY REPORT REGARDING PARA 2:

1. Though verified as true from the Home and Tribal Affairs Department, KP, yet notification No.SO(Police)HD/SMY 2019, Merged Area/691-700, dated 07.05.2021, regarding the absorption of 31-Khasadar Force of Sub-Division Wazir into KP Police is totally wrong, fake and fabricated. These names had neither been recommended by the DPO office or any scrutiny committee nor sent by the APA/DC office, Bannu, for absorption in police: Some hidden hands of the CPO clerical staff and Home Department with mutual connivance and mala-fide intention have prepared a fake, illegal and illogical list of 31 individuals for their absorption in the rank of Constables. No scrutiny committee (comprising DPO, DC/AC/APA & DAO) had recommended these names for their absorption in police. Perhaps the hidden

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hands had also prepared their fake scrutiny committee reports bearing fake signatures of the committee members.

RECOMMENDATOINS:

Keeping the above facts and figures in view, the committee members unanimously recommend the following recommendations:

- I. The Home and Tribal Affairs Department, Khyber Pakhtunkhwa may please be approached through proper channel to issue corrigendum in notification No.SO(Police)HD/SMY 2019, Merged Arca/87-97, dated 08.01.2021 and exclude the names from serial No. 1 to 10, as their absorption has already been notified in their original/actual ranks. Second absorption is absurd and any absorption above the original ranks is in contrary to the dictum of equivalency of Khasadar Act. While, the remaining names from serial No. 11-to 54 are correct.
- II. Similarly, a corrigendum is required by the Home and Tribal Department innotification No.SO(Police)HD/SMY 2019, Merged Area/2410-20, dated 16.10.2020, regarding the exclusion of the name of Muhammad Tahir S/O Khushdil Khan (mentioned at serial No. 5).
- III. Likewise, the Home and Tribal Department, KP may please be approached to issue cancellation of the notification No.SO(Police)HD/SMY 2019, Merged Area/691-700 dated 07.05.2021 regarding the absorption of 31 men, being totally wrong.
- 1V. The Worthy DPO, Bannu is requested not to take any step regarding the absorption of 31 individuals in police department as the concerning notification No.SO(Police)HD/SMY 2019, Merged Area/691-700, dated 07.05.2021 is falsely prepared by some secret hands with mala fide intention.
- V. The worthy DPO, Bannu, is also requested to withdraw/rescind the consequential proceedings on the unauthorized second absorption of the officials mentioned at serial No.1 to 9 vide Home and Triable Affairs Department notification No.SO(Police)HD/SMY 2019, Merged Area/87-97, dated 08-01-2021 and official mentioned at serial No.05 vide Home and Tribal Affairs Department notification No.SO(Police) HD/SMY 2019, Merged Area/2410-20, dated 16-10-2020 in the rank of ASIs. The ranks and salary of individuals mentioned at serial No. 1 to 9 may please be fixed in accordance with the original ranks of first absorption vide notification No.SO(Police) HD/SMY 2019, Merged Area/483-93, dated 18-02-2020 tabulated as under:

CH NI OFFI			
· ·	Name & Father's Name	Previous rank	Rank in which absorbed.
20 -	Hamayun Khan S/O Rawal Khan	Havaldar	HC (BPS-9)
27	Abdullah S/O Abdul Janan	Havaldar	HC (BPS-9)
41	Hassan Gul S/O Adam Gul	Naik	B-1 pass Constable (BPS-7)
225	Shah Hussain S/O Akhtar Munir	Khasadar	Constable (BPS-7)

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301		Khasadar	Constable (BPS-7,)
	Mashat Khan	11:20	
312	Javid Iqbal S/O Daud Khan	Khasadar	Constable (BPS-7)
596	Hafiz Rehman S/O Nazar Gul	Khasadar	Constable (BPS-7)
600	Mushahid ul Wadood S/O Fazal Wadood	Khasadar	Constable (BPS-7)
612	Rahmat Ali S/O Zakim Khan	Khasadar	Constable (BPS-7)

They are also recommended for departmental proceedings being involved in cheating, dishonesty and forgery.

VI. Sadam Hussain S/O. Hunar Khan mentioned at serial No.10 of the notification No.SO(Police) HD/SMY 2019, Merged Area/\$7-97, dated 08-01-2021; and Muhammad Tahir Khan S/O Khushdil Khan mentioned at serial No. 5 vide Home and Tribal Affairs Department notification No.SO(Police) HD/SMY 2019, Merged Area/2410-20, dated 16-10-2020 are totally outsiders and private persons and their absorption could not be warranted under any law. They are not members of Khassadar Force, Levy Force or Police Force. Their names have neither been recommended by the APA office nor sent to CPO by the DPO office, Bannu. Their names are also not been recommended by the authorized scrutiny committee. They have managed the induction of their names through back-doors with mala fide intention. Being outsiders private persons and involved in cheating, dishonesty and forgery, a criminal case is recommended to be registered against them, with their immediate removal from service and recovery of salaries.

VII. A high level enquiry at CPO level is recommended to be conducted for tracing out the hidden hands in the whole game.

Submitted please.

SHAHID ADNAN DSP HQrs: Bannu

MUHAMMAD FARÖOQ KHAN SI Legal, Bannu

FARHAT ULLAH OHC, SDW, Bannu

SALEÉM RIAZ
Additional Superintendent of Police,

Bannu

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As per the recommendation of inquiry committee report NO. 224/ASP dated 24.08.2022 constituted vide this office Order No.3639-42 dated 11.08.2022 the following officials were notified as ASIs vide. Home Department Notification No. SO(Police)HD/SMY 2019 Merged Area/87-97 dated 08.01.2021through fictitious, fraudulent means and based on deception as their names had neither been sent by Deputy Commissioner Office/AC SDW Bannu nor recommended by scrutiny committee (comprising DPO Bannu, DC/AC/APA Bannu, DAO Bannu) for absorption as ASIs as the officials at Sr No. 1 to Sr No. 9 were initially absorbed as Constables/ Head Constables and then directly notified/absorbed as ASIs by Home Department Khybor Pakhtunkhwa while officials at Sr No. 10 and 11 were not even members of Khasadar/Levies Force as indicated in the table below:

h -	Khasadar/Levies	Force as indicated in the table b	oelow:	
s#]	Mame of	Absorbed/Notified as	Absorbed/Notified as	Remarks
	Official	Constable/ Head	ASIs vide Norification	
		Constable vide	No. & Date	
		Notification No. & Date		
·	Hamayun s/o	No.SO(Police)HD/SMY	No.SO(Police)HD/SMY	He was initially absorbed
	Rawal Khan	2019 Merged Arca/483-93,	2019Merged Area/87-97,	as Head Considere and
•		dated 18.02.2020	dated 08.01.2021	later on fraudulently
		0.000		l absorbed as ASI
· 	Abdullph s/o	-do-	-do-; ·	He was initially absorbed
. 2		-1107		as Head Constable and
	Abdul Janan		,	later on fraudulently
		`		absorbed as ASI
				1
3	Hassan Gul s/o	-do-	·CD»	Fig was initially absorbed
	Adam Gül 📑 🐇			as B-1 Constable and later
. "				on fraudulently absorbed
-				as ASI
	Shah Hussain s/o	-do-	-do ,	He was initially absorbed
	Akhtar Munir			as Constable and later on
•				fraudulently absorbed as
				ASI
	Mukhtar Ullah	-do-	-do-	He was initially absorbed
ر	1.			as Constable and later on
	s/o Mashat Khan			fraudulently absorbed as
				ASI
			do.	He was initially absorbed
6	Javid Iqbal s/o	-do-	-do-	as Constable and later on
	Daud Khan			
				fraudulently absorbed as
				l ASI
7	Hafiz Rehman	-do-	-do-	He was initially absorbed
i }	s/o Nazar Gul			as Constable and later or
-				fraudulently absorbed to
i .	,			ASI
1				
			and the second s	and the first and the second of the second



ORDER:

As per the recommendation of inquiry committee report No. 224/ASP dated 24.08.2022 constituted vide this office Order No. 3639-42 dated 11.08.2022, the following officials were notified as ASIs vide Home Department Notification No. SO (Police) HD/SMY 2019 Merged Area 87-97 dated 08.01.2021 through fictitious, fraudulent means and based on deception as their names had neither been sent by Deputy Commissioner Office/AC SDW Bannu nor recommended by scrutiny committee (comprising DPO Bannu, DC/AC/APA Bannu, DAO Bannu) for absorption as ASIs as the officials at Sr No.1 to 9 were initially absorbed as Constables/Head constables and then directly notified/absorbed as ASIs by Home Department Khyber Pakhtunkhwa while officials at Sr No. 10 and 11 were not even members of Khasadar/Levies Force as indicated in the table below:

		111011111			D = mleo
Γ	S#	Name of Official	Absorbed/Notified	Absorbed/Notified	Remarks
			as Constable/Head	as ASIs vide	1
			Constable vide	Notification No. &	·
			Notification No. &	Date	
	ļ		Date		
}	1	Hamayun S/o	No. SO (Police)		He was initially absorbed as
	-	Rawal Khan	HD/SMY 2019	*	
		110111	Merged Area/483-	Merged Area 87-	fraudulently absorbed as ASI
			93 dated	97 dated	
			18.02.2020	08.01.2021	
-	2	Abdullah S/o	-do-	-do-	He was initially absorbed as
	4 .	Abdul Janan			Head Constable and later on
		Abdarsance	1		fraudulently absorbed as ASI
-	3	Hassan Gul S/o	do-	-do-	He was initially absorbed as B-
	,	Adam Gul	(1 Constable and later on
		Addin Gui	; _		fraudulently absorbed as ASI
1	4	Shah Hussain S/o	do-	-do-	He was initially absorbed as
	4	Akhtar Munir			Constable and later on
		ARTEGIE		,	fraudulently absorbed as ASI
	5	Mukhtar Ullah	do-	-do-	He was initially absorbed as
	5	S/o Mashat Khan			Constable and later on
		3/0 Mashat Khan			fraudulently absorbed as ASI
	6	Javed Iqbal S/o	do-	-do-	He was initially absorbed as
	ס	Daud Khan			Constable and later on
		Daud Kliali			fraudulently absorbed as ASI
	7	Hafiz Rehman S/o	do-	-do-	He was initially absorbed as
	_′	Nazar Gul			Constable and later on
		INAZAI GUI		,	fraudulently absorbed as ASI
	l	1			

ŧ.	1				(A)
٠	1.	, Ģ	Mushahid ul	-do-	-do- He was initially absorbed
		٠	Wadood s/o		
^		•	Pazal Wadood		as Constable and later on
					fraudulently absorbed as
		9	Ralunat Ali s/o	-do-	ASI
			Zakim Khan		-do ² He was initially absorbed
		j			as Constable and later on
	-		*		fraudulently absorbed as
		0	Saddam Hussain	Nil	ASI
			s/o Hunar Khan	. 1111	-do- He was neither a member
1.				•	of Khasadar/Levies Force
					neither his name had been
					sent by DC Bannu/ AC
	•	.			SDW Bannu office nor his
	•				name had been
	,				recommended by
					Scrutiny/Committee
					(comprising DPO Bannu,
.	٠,				DC/AC/APA Bannu, DAO
	,	-			Bannu) for absorption as
-	· • • • • • • • • • • • • • • • • • • •				ASI and even as Constable
	11.		Iuhammad	Nil	No.SO(Police)HD/SMY He was neither a member
		- 1	ahir s/o		2019Merged Area/2410- of KhasaJar/Levies Force i
		$\int K$	husdil Khan		20, dated 16.10.2020 neither his name had been
					sent by DC Bannu/ AC
	•				SDW Bannu office nor his
	. '				
					name had been
į					recommended by Scrutiny
				v	Committee (comprising
• •				: · ·	DPO Bannu, DC/AC/APA
					Bannu, DAO Bannu) for
	,				absorption as ASE
					However, he managed his
					service change with one
					Zar Ali s/o Mir Qazi Bat
				1	Khan after 04 days (i.e. on
	,	٠.			20.10.2020) of his
				·	fraudulent notification as
·					ASI
			r 7		

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		•	_	
8	Mushahid	-do-	-do-	He was initially absorbed as
	Wadood S/o	!	-	Constable and later on
	Fazal Wadood		,	fraudulently absorbed as ASI
9	Rehmat Ali S/o	-do-	-do-	He was initially absorbed, as
9	Zakim Khan			Constable and later on
	Zakiiii Kiidii	*		fraudulently absorbed as ASI
10	Saddam Hussain	Nil	-do-	He was neither a member of
10	S/o Hunar Khan		·	Khasadar/Levies Force neither
	5/0 Hullal Kilali	·		his name had been sent by DC
				Bannu/AC SDW Bannu office
			,	nor his name had been
1			·	recommended by scrutiny
				committee (comprising DPO
		;		Bannu /DC/AC/APA Bannu,
				DAO Bannu) for absorption as
				ASI and even as Constable.
11	Muhammad	Nil	No. SO (Police)	He was neither a member of
1 11	Tahir S/o		HD/SMY 2019	Khasadar/Levies Force neither
	Khushdil Khan		Merged Area	his name had been sent by DC
1	Kilustiuli Kilui		2410-20 dated	Bannu/AC SDW Bannu office
			16.10.2020	nor his name had been
ļ				recommended by scrutiny
	· ·	·		committee (comprising DPO
				Bannu /DC/AC/APA Bannu,
				DAO Bannu) for absorption as
		. ,		ASI. However, he managed his
	;			service change with one Zar Ali
	·			S/o Mir Qazi Bat Khan after 04
	,			days (i.e. on 20.10.2020) of his
	1			fraudulent notification as ASI.

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In the light of above names of ASIs Saddam Hussain and Muhammad Tahir are hereby struck off from this District Police and their salaries are stopped immediately and to recover through legal means, while the following officials are reverted to their original Ranks as below and should be proceeded departmentally:

1.	the state of the s		
	Name of official Hamayun Khan s/o Rawai Khan	Present Runk	Reverted to the Rank as mentioned in Frome Department Notification No. SO. (Police)HD/SMY 2019 Merged Area/483-93, dated 18.02.2020
-2	Abdullah s/o Abdul Janan	ASI	HC (BPS-09)
3	Hassan Gul s/o Adam Gul	-do-	HC (BPS-09)
4	Shah HUssain s/o Akhtar Munir	do-	B-1 Constable (BPS-07)
	Johan 11033am 5/0 Akntar Manir	-do-	Constable (BPS
. 5	Mukhtar Ullah s/o Mashat Khan	do-	Constable (BPS
6	Javid lqbal s/o Daud Khan	-do-	Constable (BPS
7	Haliz Relunan s/o Nazar Gul	do-	Constable (BPS
3	Mushahid ul Wadood s/o Fazal Wadood	-do-	Constable (BPS
9	Rahmat Ali s/o Zakim Khan	do-	Constable (BPS

Moreover, any consequential proceedings after their appointment notification/orders as ASIs is void Ab initio, and considered to be withdrawn.

dated: 0 / /09/2022.

District Police Officer Bahnu

No. 3897 - 3906 dated: 01/09/2022

Copy of above is submitted to:

- 1. The Regional Police Officer Bannu Region, Bannu for favor of information.
- 2. The Deputy Inspector General of Police HQr CPO, Peshawar for favor of information.
- 3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
- 4. The Assistant Inspector General of Police (NMDs) CPO, Peshawar.
- 5. The Additional SP Bannu Chairman Inquiry Committee constituted vide this office Order No.3639-42 dated11.08.2022.
- -6. The District Accounts Officer, Bannu
- 7. Head Clerk DPO Office, Bannu.
- 8/SRC/OHC SDW, Bannu
- 9. SRC/OHC District Bannu.

10. Pay Officer

For necessary action and correction of record



Bother Copy

In the light of above names of ASIs Saddam Hussain and Muhammad Tahir are hereby struck off from this District Police and their salaries are stopped immediately and to recover through legal means, while the following officials are reverted to their original Ranks as below and should be proceeded departmentally:

S#	Name of official	Present Rank	Reverted to the Rank as mentioned in Home Department Notification No. SO (Police) HD/SMY 2019 Merged Area/ 483-93, dated 18.02.2020
1	Hamayun S/o Rawal Khan	ASI	HC (BPS-09)
2	Abdullah S/o Abdul Janan	-do-	HC (BPS-09)
3	Hassan Gul S/o Adam Gul	-do-	B-1 Constable (BPS-07)
4	Shah Hussain S/o Akhtar Munir	-do-	Constable (BPS-07)
5	Mukhtar Ullah S/o Mashat Khan	-do-	Constable (BPS-07)
6	Javed Iqbal S/o Daud Khan	-do-	Constable (BPS-07)
7	Hafiz Rehman S/o Nazar Gul	-do-	Constable (BPS-07)
8	Mushahid Wadood S/o Fazal Wadood	-do-	Constable (BPS-07)
9	Rahmat Ali S/o Zakim Khan	-do-	Constable (BPS-07)
L	ì		taria di Para di Maria di Para di Para di Para di Para di Para di Para di Para di Para di Para di Para di Para

Moreover, any consequential proceedings after their appointment notification/orders as ASIs is Void Ab initio, and considered to be withdrawn.

O.B No. 944

dated: 01/09/2022

District Police Officer, Bannu

No. 3897-3906 dated: 01/09/2022

Copy of above is submitted to:

- 1. The Regional Police Officer, Bannu Region Bannu for favour of information.
- 2. The Deputy Inspector General of Police HQr CPO, Peshawar for favour of information.
- 3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
- 4. The Assistant Inspector General of Police (NMDs) CPO, Peshawar.
- 5. The Additional SP Bannu Chairman Inquiry Committee constituted vide this office order No. 3639-42 dated 11.08.2022.
- 6. The District Account Officer, Bannu.
- 7. Head Clerk DPO Office, Bannu.
- 8. SRC/OHC SDW, Bannu.
- 9. SRC/OHC District Bannu.
- 10.Pay Officer.

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BEFORE THE WORTHY REGIONAL POLICE OFFICER BANNU REGION BANNU

Subject:

Departmental Appeal for cancellation/set-aside the impugned inquiry No. 224/ASP dated 24/08/2022 and subsequently impugned order No. 944 dated 01/09/2022 vide which the appellant has illegally been struck off from the District Police issued by District Police Officer Bannu.

Respected Sir,

It is humbly requested with profound respect, the appellant most earnestly seeks permission to submit as under;

- That initially the appellant was serving in Levies/Khasadar force of Wazir Sub-Division and subsequently merged in Khyber Pakhtunkhwa Police Department District Bannu in the year 2019.
- That the appellant was absorbed as ASI (BPS-11) vide Notification No. SO (Police) HD/SMY 2019 Merged Area/2410-20 dated 16/10/2020 by Secretary Home and Tribal Affairs Department (Copy of Notification dated 03/01/2021 is attached as Annexure-A)
- 3. That after absorption as ASI, the appellant was performing his duties as ASI and is regularly receiving his salary since 08/01/2021 till date.
- 4. That the then RPO Bannu constituted the inquiry committee regarding Absorption in Levies/Khasadar and comprising Inspector Muhammad Faroog Khan SDPO (Chairman), Inspector Rizwan Khan SDPO/Rura!-II and Senior Clerk Javed Khan Head Clerk as members and they filed the inquiry report vide No. 197-200 dated 30/06/2021. (Copy of Inquiry dated 30/06/2021 is attached as Annexure-B)



(58

25/02/2022. (Copy of restoration order dated 25/02/2022 is attached as Annexure-G)

- 10. That all of a sudden once again when the matter was resolved by high-ups, the District Police Officer Bannu vide impugned order dated 11/08/2022 constituted the committee regarding probe into suspicious/controversial notifications and they recommended that the absorption of the appellant is contrary to the Khasadar Act. (Copy of impugned inquiry committee dated 24/08/2022 is attached as Annexure-H)
- 11. That in the light of the recommendations raised by the inquiry committee, the District Police Officer Bannu issued an impugned order No. 3897-3906 dated 01/09/2022 and awarded the major penalty by reverted the service of the appellant from ASI (BPS-11) to Constable (BPS-07). (Copy of impugned reversion order dated 01/09/2022 is attached as Annexure-I)
- 12. That the impugned order No. 3897-3906 dated 01/09/2022 is illegal, unlawful, unnatural, void-ab-initio, null and void in the eye of law, hence liable to be declared so.
- 13. That the fundamental rights of the appellant has blatantly violated by issuing the impugned order No. 3897-3906 dated 01/09/2022 and the appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- 14. That without given any notice or given an opportunity of personal hearing and issuance of impugned order No. 3897-3906 dated 01/09/2022 is the clear cut violation of Right to fair trial i.e. Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 and also against the settled norms of service laws/rules prescribed for all the institutions.



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- 15. That the appellant is being harassed and has been vexed twice for double punishment, which is against the mandate of Article 13 of the Constitution of Islamic Republic of Pakistan, 1973.
- 16. That if the appellant is being struck off from Police Department then the dignity of the appellant will be in danger in the Police department as well as in the entire society.

PRAYER IN APPEAL:-

It is therefore, most humbly prayed that, on acceptance of this appeal, the impugned inquiry committee recommendations dated 24/08/2022 and impugned struck off order No. 3897-3906 dated 01/09/2022 from ASI (BPS-11) from Police Department being illegal, unlawful, unconstitutional, void-ab-initio, and the appellant may kindly be re-instated to the service to the actual rank ASI (BPS-11) with all back benefits to meet the ends of justice.

Appellant

The almost

Muhammad Tahir S/o Khushdil Khan ASI (SPS-11)

Dated: 12/09/2022

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GOVERNMENT OF KHYBER PAKHTUNKHWA Home & Tribal Affairs Department

Dated 10/11/2022

NOTIFICATION

1498-1503

No.SO(Police)HD.SMY/Notification/1498-1503/. The Competent Authority has been pleased to constitute an inquiry committee comprising of the following officers to dig out the real facts existing into the absorption case of Ex-Khasadars/levies Force in Khyber Pakhtunkhwa Police Department vide Notifications, No.SO (Police)HD/ SMY 2019 Merged Arca/691-700 dated 07-05-2012 and SO (Police)HD/ SMY 2019 Merged Area/87--97 dated 08-01-2021

Sl.No.	Name & Designation	Status .
1	Mr. Umar Nawaz Khan Deputy Secretary (Judicial)	Chairman
	Home Department	
2	Registrar office of Provincial Police Office	Member
3	District Police Officer Bannu	Member
4	Assistant Commissioner Sub Division Wazir Bannu	Member
5	District Accounts Officer Bannu	· Member

TORs of the inquiry committee are as under:-

i. To identify the real individual/culprits involved in malpractice.

ii. To pinpoint the persons from grass route level who initiated the process of absorption of the above levies personnel in Police.

iii. To ascertain the quantum of financial loss sustained by Govt, in shape of payment of salaries

iv. Any other point the committee may like to consider.

The committee will submit its finding to the competent authority within Fifteen

days (15) after issuance of this notification, please.

Secretary Lome & TAS

Copy to:

1. Mr. Umar Nawaz Deputy Secretary (Judicial) Home Department.

2. All Members of the inquiry committee

3. PS to Secretary Home & Tribal Affairs Department

4. PS to Special Secretary-II Home Department

Section Officer (L&K)

Mag)

Scanned with CamScar



Father's Name: --

RAUF ULLAH KHAN

Address:

DISTRICT COURTS BANNU

Contact No: Enrolment Date L.C: 16-February-2018 Enrolment Date H.C: 29-April-2020

0332-9745361

Place of Practice: Date of Birth:

BANNU 23-October 1995

Blood Group: C.NIC No:

B+VE 11101-7059645-1

2754

KHYBER PAKHTUNKHWA BAR COUNCIL



KHYBER PAKHTUNKHWA **BAR COUNCIL**

YASIR RAUF WAZIR

Advocate

Bc-20-2895

Date of issue: February 2022

Valid upto: February 2025



Acting Secretary KP Bar Council

ان مقدمه: رٹ پٹیش *ا*فوجداری اپیل *ا*س

باعث تحرير آنكه

مقدمہ مندرجہ عنوان بالا ہم اپنی طرف سے واسطے پیروی وجوابد ہی اور دیگر کل کاروائی کیلئے برائے

مقام: كييت وريايدوكي وزيرايدوكي الكاكورك

کو و کیل مقرر کر کے اختیار دیتے ہیں کہ میری / ہماری جناب سے مقدمہ مذکورہ کی پیروی وجوابد ہی کرے۔ راضی نامہ کرے، فیصلہ ثالثی کرائے کہ فیصلہ کرانے پر حلف منظور کرہے ہر قشم کا بیان دیوہے، ہر قشم کے سوال وجواب کرے، عرضی وعویٰ دعویٰ، اپیل جواب الجواب ، عذرات ، نگرانی، نظر ثانی ، درخواست ہائے متفرق اور دیگر ہر قسم کے دستاویزات الل كرے، واپس ليوے، دست بر داري كرے، ترميم كرے، ہر قسم رقوم مقدمہ، جرمانہ، ہر جانہ داخل ے۔ قبضہ جائیداد لیوے دیوے۔ اینے ہمراہ ایڈوکیٹ بیرسٹریا مختار قانون برائے جزوی یاکل کاروائی مقرر کرے علیحدہ کرے۔ دوران مقدمہ اگر جرمانہ ، ہر جانہ فریق مخالف سے وصول ہو، وہ حق و کیل صاحب کا ہو گا۔ اگر پیشی ایسے مقام پر ہوجو صدر مقام سے دور ہوتو و کیل صاحب پیروی کے ذمہ دار نہ ہو نگے۔ اس سلسلے میں جملہ ساختہ ووبر داختہ و کیل صاحب موصوف منظور و قبول ہو گا۔ لہذاو کالت نامہ ہذالکھدیا کہ سندر ہے۔ نیز وو کیل موصوف کومیری جانب سے مقدمہ نوجداری ومال میں بھی مکمل کاروائی کرنے کا مکمل اختیار یا مضمون بالاحاصل ہو گا۔ ^ک

Attested:

مضمون و کالت نامه سن لیااور اچھی طرح سمجھ لیاہے اور منظور ہے۔

0332-9745361

Yasir.rauf.1995@gmail.com

