

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR  
AT CAMP COURT ABBOTTABAD.

Service Appeal No. 9403/2020

Date of institution ..... 17.08.2020

Mohammad Nazir S/O Roshan Din, Head Constable, Police Lines,  
Haripur.

VERSUS.

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and two others.

ORDER

22.09.2021

Mr. Muhammad Aslam Tanoli, Advocate, for the appellant present.

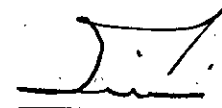
Mr. Usman Ghani, District Attorney for the respondents present.

Learned counsel for the appellant stated at the bar that relief so sought by the appellant through instant appeal has already been granted to him, therefore, as per instruction of the appellant, he wants to withdraw the instant service appeal. In this respect, he submitted written application, which is placed on file.

In light of the above, the appeal in hand stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

22.09.2021



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

Before the Honorable Service Tribunal  
Peshwar Camp Court Abbottabad

Appeal No. 7403/20

Muhammad Nazir - vs - PPO/CP/KK  
& others.

Service Appeal

Application for permitting to withdraw  
the titled appeal unconditionally.

Respectfully Shuruah:

1. The titled appeal is pending adjudication before this Honorable Tribunal & is fixed to today.
2. The relief sought for in the titled appeal has been granted vide order dated "11/2020" by the RPO Abbottabad. (Copy attached).
3. That now I want to withdraw the titled appeal without further proceedings.

It is prayed that this Honorable Tribunal may graciously be pleased to allow me to withdraw the above appeal unconditionally.

Dated 22/9/2021

Through

Petitioner/Appellant  
M. Aslam  
(Muhammad Aslam Tambli)  
Advocate High Court  
at Abbottabad.



OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

0345-9560687

NO: 2937599/RE DATED 11/11/2020

**ORDER**

Consequent upon the recommendation of promotion board held in the office of the undersigned on 05-08-2020, the following Adhcc ASIs & Head Constables on list "D" of this Region were found suitable for promotion as such they are hereby promoted to the rank of officiating ASIs.


Their promotion will take effect from the date of taking over the charge of higher responsibility:-

S #	NAME AND NO.	PRESENT POSTING	RECOMMENDATION
1.	HC Muhammad Rizwan No.319	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
2.	HC Naseer Ahmed No.714	Elite Force Hazara	Promotion as Officiating ASI.
3.	HC Muhammad Nazeer No.215	Haripur District	Promotion as Officiating ASI.
4.	HC Muhammad Aslam No.767	Special Branch Peshawar	Promotion as Officiating ASI.
5.	HC Muhammad Naseem No.10	Special Branch Peshawar	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
6.	HC Muhammad Arshad No.369/73	Lower Kohistan District	Promotion as Officiating ASI.
7.	HC Abdul Waheed No.351	Mansehra District	Promotion as Officiating ASI.
8.	HC Ashfaq Ahmed Lodhi 118	Elite Force Hazara	Promotion as Officiating ASI.
9.	HC Muhammad Navoed No.159	CTD Hazara	Promotion as Officiating ASI.
10.	HC Munir Ahmed No.95	Haripur District	Promotion as Officiating ASI.
11.	HC Jahanzaib No.147	Haripur District	Promotion as Officiating ASI.
12.	HC Chanan Khan No.751/650	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
13.	HC Riaz Ahmed No.897	Intelligence School Abbottabad	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
14.	HC Muhib-ur-Rehman No.385	Special Branch Peshawar	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
15.	HC Muhammad Javed No.558	Lower Kohistan District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
16.	HC Muhammad Afzal No.22	Upper Kohistan District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
17.	HC Jehanzeb No.01	Upper Kohistan District	Promotion as Officiating ASI.
18.	HC Rashid Khan No.150	Haripur District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.
19.	HC Abdul Raheem No.355	Upper Kohistan District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course.

spk

20	HC Muhammad Zohaib Khan No.419/1173	Motorway Islamabad	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
21.	HC Muhammad Firdous No.288	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
22.	HC Shams-ur-Rehman No.270	Upper Kohistan District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
23.	HC Sana Ullah No.182	Abbottabad District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
24.	HC Syed Aftab Shah No.37	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
25.	HC Jehangir No.333	PTS Mansehra	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
26.	HC Muhammad Amir No.815	Abbottabad District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
27.	HC Afsar Khan No.563	Abbottabad District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
28.	HC Muhammad Nazakat No.402	Elite Force Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
29.	HC Shafqat Nawaz No.141	Special Branch Peshawar	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
30.	HC Saeed Ahmed No.158	Lower Kohistan District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
31.	HC Yakhya Khan No.267	Abbottabad District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
32.	HC Jan Muhammad No.09	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
33.	HC Muhammad Maskeen No.527	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
34.	HC Liaqat Khan No.02	Elite Force Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
35.	HC Syed Iqbal Shah No.05	Battagram District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
36.	HC Mumtaz No.50	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
37.	HC Saqib No.912	PTS Mansehra	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
38.	HC Alamzeb No.05	CTD Hazara	Promotion as Officiating ASI.
39.	HC Muhammad Sadaqat No.112	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
40.	HC Abdul Waheed No.397	Abbottabad District	Promotion as Officiating ASI.
41.	HC Muhammad Ali No.374	PTS Mansehra	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
42.	HC Shoukat Khan No.517	Special Branch Peshawar	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
43.	HC Abdur Rasheed No.177	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
44.	HC Irshad Khan No.213	Abbottabad District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course

	HC Muhammad Idrees No.160	Battagram District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
46.	HC Amjad Khan No.192	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
47.	HC Tariq Khan No.148	Mansehra District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
48.	HC Sher Afsar No.387	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
49.	HC Muhammad Nazir No.13/642	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
50.	HC Shahzad Shah No.123	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
51.	HC Nazir Ahmed No.111	Battagram District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
52.	HC Waqas Ahmed No.341	Motorway Islamabad	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
53.	HC Khan Afsar No.983	Abbottabad District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
54.	HC Sher Bahadar Khan No.154/509	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
55.	HC Anwar Sadad No.221	Upper Kohistan District	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
56.	HC Tahir Khan No.26	CTD Hazara	Promotion as Officiating ASI. However, according to standing order No.10/2014, he will qualify (08 weeks) Elite tactical training Course
57.	HC Abid Hussain No.861	PTS Mansehra	Promotion as Officiating ASI.

  
Regional Police Officer,  
Hazara Region Abbottabad

Copy of above is forwarded for information and necessary action

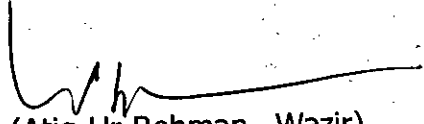
to the:-

1. Addl: Inspector General of Police, Elite Force, Khyber Pakhtunkhwa Peshawar.
2. Addl: Inspector General of Police, Special Branch, Khyber Pakhtunkhwa Peshawar.
3. Deputy Inspector General of Police, Motorway Police Islamabad.
4. All District Police Officers, in Hazara Region.
5. All Superintendents of Police Investigation in Hazara Region.
6. Superintendent of Police CTD Hazara Abbottabad.
7. Superintendent of Police Elite Force Hazara Abbottabad.
8. Director PTS Mansehra.
9. Director Police School of Intelligence Abbottabad.
10. Superintendent of Police KPF at Battagram.

17.02.2021


Counsel for the appellant and Riaz Khan Paindakhel learned Asst. AG alongwith Israr Shah Reader for respondents present.

Representative of respondents requested for time to submit reply/comments. Granted. To come up for reply/comments on 21.04.2021 before S.B at Camp Court, Abbottabad.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court, A/Abad

21-4-21

Due to covid 19, the case is adjourned  
to 22-9-2021 For the same.

  
Reader



20.11.2020

Mr. Mohammad Aslam Tanoli, Advocate, for appellant is present. According to the learned counsel representing appellant that appellant was served with a charge sheet accompanied with statement of allegations alleging therein that appellant failed to properly interrogate the accused, he did not make pointation of the crime scene nor he recovered the weapon of offence nor was able to recover the vehicle used in the offence. No sooner did appellant receive information regarding the arrest of accused Hanif involved in case FIR No. 548 dated 12.05.2018 under sections 302, 334 PPC of PS Sarai Saleh was arrested in case under section 424 PPC and was being produced before the court for obtaining his physical custody than the appellant immediately reached the court, when custody was declined, appellant arrested him obtaining two days custody from the Judicial Magistrate during the course of which he was thoroughly interrogated but accused persistently against the accused pleaded innocence. The accused was interrogated as well by DSP Circle and SHO PS Sarai Saleh but nothing was brought on record. On the expiry of custody he was again produced before the court of Judicial Magistrate Haripur on 04.05.2020 for obtaining five days custody which was declined. Appellant tried his level best to extract something material from the accused but the latter insisted innocence. It was during the course of probe conducted earlier by one Naik Muhammad S.I it was found that eye witnesses Asmat Khan of the case was not present at the scene of occurrence at the relevant time rather he was found at village Lanriyal a place far away and he was not able to recover anything from accused Khanwaiz of this case but no punishment was awarded to him which is discrimination. All these facts were in the knowledge of the DSP concerned.

The point so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 17.02.2021 before S.B at Camp Court, Abbottabad.

Appellant Deposited  
Security & Process Fee

(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

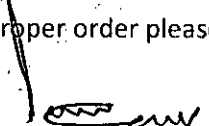
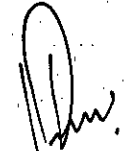


Form- A

FORM OF ORDER SHEET

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

Case No.- 9403 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17 /08/2020	<p>The appeal of Mr. Muhammad Nazir presented today by Mr. Muhammad Aslam Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR Alabad,</p> <p>This case is entrusted to Touring S. Bench for preliminary hearing to be put up there on <u>20.11.2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Appeal No.....9403/2020

Mohammad Nazir S/O Roshan Din, Head Constable, Police Line  
Haripur.

**Appellant**

**VERSUS**

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

**Respondents**

**SERVICE APPEAL**

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3.	FIR No. 539 dated <b>12-08-2018</b>	"C"	15
4.	Zimni No.21,22,23 & 24 (05 sheets)	"D"	16 - 20
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Through

  
**Appellant**

(Mohammad Aslam Tanoli)  
Advocate High Court  
at Haripur

Dated: 17-08-2020

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**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Appeal No.....9403/2020

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 8762

Dated 17.8.2020

Mohammad Nazir S/O Roshan Din, Head Constable, Police Lines, Haripur.

**Appellant**

**VERSUS**

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

**Respondents**

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 05-06-2020 OF THE DISTRICT POLICE OFFICER HARIPUR WHEREBY APPELLANT HAS BEEN "DISMISSED FROM SERVICE" AND ORDER DATED 03-08-2020 WHEREBY WHILE ACCEPTING HIS DEPARTMENTAL APPEAL THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD HAS CONVERTD PEALTY OF DISMISSAL INTO REDUCTION IN RANK FROM A.S.I. TO HEAD CONSTABLE AND THE PERIOD APPELLANT REMAINED OUT OF SERVICE (FROM 05-06-2020 TO 03-08-2020) HAS BEEN TREATED AS LEAVE WITHOUT PAY.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH ORDERS DATED 05-06-2020 AND 03-08-2020 OF RESPONDENTS MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE RESTORED HIS RANK OF ASSISTANT SUB INSPECTOR AND THE PERIOD HE REMAINED OUT OF SERVICE BE TREATED AS ON DUTY OR AT LEAST LEAVE OF THE KIND DUE BE GRANTED WITH GRANT OF ALL CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respectfully Sheweth:

**Filed to-day**

**Registrar**

17/8/2020

That while appellant posted as ASI/IO Police Station Sere-Saleh (Haripur) was served upon with a Charge Sheet dated 06-05-2020 which was duly replied on 11-05-2020 explaining all facts and circumstances of the matter in

detail and denying the allegations incorporated therein against the appellant being incorrect and baseless. **(Copies of Charge Sheet & its reply are attached as Annexure-"A & B")**.

2. That on 02-05-2020, appellant received information that accused Hanif involved in case FIR No. 539 dated 12-08-2018 U/S 302/34-PPC PS Sarai Saleh had been arrested by local police in a case U/S-424-PPC and was being produced before the Court by one Fazal Manan ASI for physical custody, upon this appellant immediately reached the Court. On refusal accused custody to Fazal Manan ASI, the appellant arrested him and secured his 02 days physical custody from Judicial Magistrate for investigation in case FIR No. 539 dated 12-08-2018 U/S 302/34-PPC. The DSP Circle and SHO PS Sarai Saleh were informed with in no time with regard to said arrest and custody. **(Copy of FIR No. 539 dated 12-08-2018 is attached as Annexure-"C")**.
3. That in two day's custody, the accused Hanif was minutely and thoroughly interrogated and all possible modalities of investigation were used but accused remained adamant to his innocence and non-involvement in the case. He stated that he was involved with malafide intention on the instigation of his opponents otherwise he had nothing to do with the matter. The facts of daily progress of investigation used to bring to the notice DSP Circle (CIO) and SHO PS concerned. The entire investigation was carried out under complete control, surveillance, directions and guidance of the DSP Circle.

(CIO) as he was a direct invigilator of the entire investigation in accordance with OG-25. **(Copies of Zimni No.21, 22, 23 and 24 are attached herewith as "D")**.

4. That ultimately the DSP Circle(CIO) and SHO PS Sarai Saleh themselves interrogated the accused Hanif but nothing with regard to his involvement could be brought to surface as the accused was claiming his innocence and non-involvement in the case under investigation.
5. That accused Hanif was arrested after about 21 months of the occurrence/registration of the case i.e. dated 12-08-2018. On 03-05-2020, when Sub Inspector Mohammad Javed Oll returned from Punjab, he in presence of appellant and SHO PS Sarai Saleh discussed with DSP Circle (CIO) and secured his guidance about ongoing situation of the case. In the light of discussion and guidance of DSP Circle the accused Hanif on expiry of 02 days custody was produced before the Judicial Magistrate Haripur on 04-05-2020 for 05 days further custody through Public Prosecutor which was not allowed and accused was ordered to be sent to jail on judicial remand. The entire facts were brought in the notice of Superintendent of Police (Investigation) Haripur.
6. That accused Hanif was interrogated to a great length putting under different questions to extract something if he was involved in the case but nothing could be found in this regard. He remained clung to his stance of innocence and non-involvement in the case. So far as question of recovery of Motor-cycle from accused Hanif is

concerned, neither he had any motorcycle nor can drive the same. **(Copies of questions and answers sheets are attached as "E")**.

7. That though accused Hanif had a house in village Langriyal but he did not live there. He alongwith his family, for the last about 24/25 years, has been residing in Rawalpindi and does a job as Milkman in a Buffaloes Farm. As per accused Hanif, he has been involved in the instant case as previously one Mazhar Khan the son of Afsar Khan and brother of Yasir Khan was murdered in which case deceased Imraj alis Sharka was directly charged and he (accused Hanif) was the friend of deceased Mazhar Khan.
8. That though accused Hanif was charged by the complainant but during investigation nothing could be recovered. During the early investigation by Naik Mohammad SI/Oll it was found that eye-witness Asmat Khan of the case at relevant time was not present at the place of occurrence rather he was found at village Lanriyal far flung from the spot. Even during his investigation he could not recovered from an other accused Khanwaiz of this case but no punishment was awarded to him. Appellant has been treated with discrimination. The entire proceeding with regard to investigation and interrogation of accused Hanif is in the knowledge of DSP Circle (CIO) and SHO Police Satiation Sarai Saleh and S.P. (Investigation). **(Copy of zimines are attached as Annexure-"F")**

9. That no proper departmental inquiry was conducted to prove the allegations against the appellant. No Show Cause Notice was issued to him. Copy of inquiry findings, if any, was never provided to him. Even opportunity of personal hearing was not afforded to the appellant. But the appellant was awarded the punishment of "Dismissal from service" vide District Police Officer Haripur order dated 05-06-2020. **(Copy of order dated 05-06-2020 is attached as "G")**.
10. That order dated 05-06-2020 of the District Police Officer Haripur was appealed against before the Regional Police Officer, Hazara Range, Abbottabad, he while accepting appellant's departmental appeal set aside order dated 05-06-2020, and penalty of dismissal from service has been converted in reduction rank from Assistant Sub Inspector to Head Constable and the period appellant remained out of service treated as leave without pay. **(Copies of departmental appeal dated 16-06-2020 and order dated 03-08-2020 are attached as Annexure-"H & I")**. Hence instant service appeal, inter alia, on the following amongst others:-

**GROUND:**

- a) That impugned orders dated 05-06-2020 and dated 03-08-2020 of the respondents are illegal, unlawful against the facts, departmental rules and regulations and principle of natural justice hence are liable to be set aside.

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- b) That no proper departmental inquiry was conducted. No Show Cause Notice was given to him. Copy of inquiry report, if any, was never provided to appellant. Even opportunity of personal hearing was not afforded to the appellant rather he was condemned unheard.
- c) That respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders, which are unjust, unfair hence not sustainable in the eyes of law.
- d) That appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken by appellant in the memo of appeal and has awarded stoppage of 03 years increments with cumulative effect. Thus act of respondent is contrary to the law as laid down in the KPK Police Rules 1934 read with section 24-A of General Clause Act 1897 and Article 10-A of Constitution of Islamic Republic of Pakistan 1973.
- e) That appellant has discharged his assigned duties with devotion, dedication and honesty. He has left no stone unturned in discharge of his duties and responsibilities and he has wrongly been awarded the punishment.
- f) That the allegations leveled against appellant in the charge sheet are of ambiguous nature, without any reason, reference, justification and based on surmises &



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conjectures which remained un-proved and un-substantiated to this day. Nothing could be brought on record against appellant for which he has been awarded with the punishment.

- g) That appellant had never investigated the case therefore question of defective investigation does not arise, the allegations are against the facts, incorrect, false, fabricated, based on surmises, conjecture and speculation, hence impugned orders are liable to be set aside straightaway.
- h) That the period (from 05-06-2020 to 03-08-2020) for which appellant was kept out of service has been treated as leave without pay by respondents. The appellant has rendered more than 27 years service in the department and there is sufficient leave balance at his credit and he could be granted leave of the kind due out of his credit instead of leave without pay.
- i) That instant appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudication upon the same.

**PRAYER:**

It is, therefore, humbly prayed that on acceptance of instant Service Appeal order dated 05-06-2020 and 03-08-2020 of the respondents may graciously be set aside and appellant be restored his rank of Asstt. Sub Inspector and the period remained out service be treated on duty or at least he be

granted leave of the kind due instead of leave without pay with all consequential service back benefits. Any other relief which this Honorable Service Tribunal deems fit and proper in circumstances of the case may also be granted.



**Appellant**

Through:



(Mohammad Aslam Tanoli)  
Advocate High Court  
At Haripur

Dated 17-08-2020

**VERIFICATION**

It is verified that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.



**Appellant**

Dated 17-08-2020

9

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Mohammad Nazir S/O Roshan Din, Head Constable, Police Line  
Haripur.

**Appellant**

**VERSUS**

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

**Respondents**

**SERVICE APPEAL**

**CERTIFICATE**

It is certified that no such Appeal on the subject has ever been  
filed in this Honorable Service Tribunal or any other court prior to  
instant one.



**APPELLANT**

Dated: 17-08-2020

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Mohammad Nazir S/O Roshan Din, Head Constable, Police Line Haripur.

**Appellant**

**VERSUS**

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Haripur.

**Respondents**

**SERVICE APPEAL**

**AFFIDAVIT:**

I, Mohammad Nazir appellant do hereby solemnly declare and affirm on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Service Tribunal.



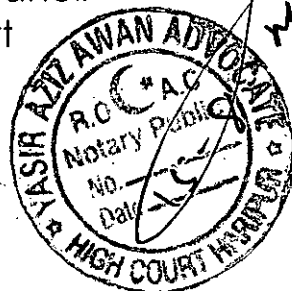
**Deponent/Appellant**

Dated: 17-08-2020

Identified By:



Mohammad Aslam Tanoli  
Advocate High Court  
At Haripur



**Appellant**

CHARGE SHEET

I, Syed Ashfaq Anwar, PSP, District Police Officer, Haripur as competent authority hereby charge you ASI Muhammad Nazir as enclosed statement of allegations.

(1) You appear to be guilty of misconduct under Police Efficiency & Discipline Rules 1975 and have rendered yourself liable to all or any of the penalties specified in the said Rules.

(2) You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet and statement of allegation to the Committee/Enquiry Officer as the case may be.

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

(4) Intimate whether you desire to be heard in person or otherwise.

(5) A statement of allegations is enclosed.

Syed Ashfaq Anwar, PSP  
District Police Officer  
Haripur

*Alind*



12/  
**DISCIPLINARY ACTION**

I. Syed Ashfaq Anwar, PSP, District Police Officer, Haripur as competent authority of the opinion that you ASI Muhammad Nazir No. 215 have rendered yourself liable to be proceeded against as you committed the following acts/omissions within the meaning of Police Efficiency & Discipline Rules 1975.

**STATEMENT OF ALLEGATION**

"That you while posted as IO PS Sarai Salah a PO Mr. Hanif s/o Haji Zardad r/o Langrhyal a nominated accused in case vide FIR No 539 dated 12.08.2018 u/s 302/34 PPC PS Sarai Salah have been arrested by a special team of city police from Rawalpindi. However, you committed the following irregularities in the investigating the case i.e;

- You failed to properly interrogate the accused.
- You didn't make pointation of the crime scene.
- You didn't recover the weapon of offence.
- You failed to recover the vehicle used in the offence.

Your this act is a severe violation of discipline, a seniors professional dishonesty and a shows that you are not following the law, gross misconduct in terms Police E&D Rules 1975" hence, charge sheeted".

(2) For the purpose of scrutinizing the conduct of the said accused officer with reference to the above allegations, an Enquiry Committee consisting of the following is constituted.

**Mr. Syed Anayat Ali Shah, SP Investigation, Haripur**

(3) The Enquiry Officer/Committee shall in accordance with the provision of this Ordinance, provide reasonable opportunity of hearing to the accused. record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action against the accused.

(4) The accused and a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer/Committee.

Syed Ashfaq Anwar, PSP  
District Police Officer  
Haripur

No: 170-70 /PA dated Haripur the 06/05/2020.

Copy of above is submitted to the:-

- 1) Enquiry Officer for initiating proceedings against the said accused under Police Efficiency & Discipline Rules 1975.
- 2) ASI Muhammad Nazir No. 215 with the direction to submit his defense within 7 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer on the date, time and place fixed for the purpose of departmental proceedings.

Syed Ashfaq Anwar, PSP  
District Police Officer  
Haripur

حساب نمائے بحوالہ جاریہ شیٹ نمبر PA/71-170 مورخہ 05/05/2020 کا مجاز یہ  
 حساب DPO صاحبان کے لیے مورخہ 08/12/18 مورخہ 39/05/18  
 302/34 نمبر کے تحت اس معاملے میں حصر و این خدمات بنوں

1 مورخہ 05/05/2020 کو حصر جاوید ان کے تحت اس معاملے میں حسب اجازت ان کے نام  
 بسلسلہ لفٹیں مقدمہ عدالت 347 مورخہ 04/28/2020 حصر 365B بسلسلہ  
 برآمدگی صورت میں مگر عدالتی ملزم حفیظ حیات جنہوں نے صلح خان بنوال میں مورخہ 07/08/20  
 نے ملزم حفیظ ولد زور اور اس کے گھر میں بحال پتہ پوری راوی لہندی کے پاس  
 ڈرہم خون پر عدالت کی کہ تمام سٹی پر پوری مقدمہ مجرم 324 میں  
 گرفتار کیا گیا تھا جسکی مقدمہ 302 تحت اس معاملے میں حصر و این  
 حاصل کر کے لفٹ کی حصر و این

2 مورخہ 05/02/2020 کو عدالت نے سٹی کے فضل حیات نے Asi نے ملزم حفیظ کو مقدمہ  
 مجرم 324 میں پیش کیا عدالت نے حصر و این کے حصر و این کے حصر و این کے حصر و این  
 حصر و این Asi لفٹ میں ملزم حفیظ کو احکام عدالت کے مطابق حصر و این کے حصر و این  
 302 میں گرفتار کر کے پیش عدالت کر کے دو ایام حصر و این کے حصر و این  
 حاصل کی

3 ملزم کی حصر و این کے حصر و این DSP کے حصر و این کے حصر و این کے حصر و این  
 میں لایا گیا ملزم کو میں نے دیگر مادیات میں بھی حصر و این کے حصر و این کے حصر و این  
 اپنے طور پر پوری حصر و این اور اسکی حالت میں سے انکا حصر و این کے حصر و این کے حصر و این  
 ملزم نے کوئی انکشاف نہ ہو سکا تھا بلکہ یہ سچو سچو ایسا ایسا ہے تاکہ حصر و این کے حصر و این  
 اور اپنے حصر و این پورے حصر و این

4 دوسرے حصر و این کے حصر و این کے حصر و این کے حصر و این کے حصر و این  
 حساب DSP کے حصر و این کے حصر و این کے حصر و این کے حصر و این کے حصر و این  
 سے اور حساب DSP کے حصر و این کے حصر و این کے حصر و این کے حصر و این کے حصر و این  
 ملزم کی سکینڈری اور دوسرے حصر و این کے حصر و این کے حصر و این کے حصر و این کے حصر و این  
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Attested  


حساب DSP منہ CID جو کہ خطرناک جرائم کے حدود میں جرم کی بنا پر  
انٹاروگیشن ملزم کی گرفتاری اور تفتیش کے لئے اور اس کے لئے ان کے دو  
ایام کی انٹاروگیشن کے تحت حالات میں ASI شخصی نام کے طور پر 5110 منہ کے  
تفتیش میں لایا۔

انہ میں جو بھی ملزم کی حراست کی آخری تاریخ جو کہ دو روزہ میں  
ضلع کالجوالی تک آئے جانے کا سفر میں کیلئے اور ملزم کی گرفتاری  
دوران حراست پولیس ملزم میں صرف وہ کی کو بھی حالات کے لئے  
جنہں سے اپنی حسابی اور ذمہ داری کے تحت اور اس کے باوجود اس  
میں صرف حریف کو ہیغٹ سے ملزم کے حساب DSP ، 5110 اور منہ شخص کی  
میں حالات و دستاویز کے تناظر میں DSP منہ کے مندرجہ ذیل حالات کی  
حساب DSP منہ کی ہدایت اور رہنمائی کی روشنی میں دو ایام کی حراست پولیس  
کے دوران سامنے آئے والے واقعات کے تحت ملزم کو آخری دو روزہ  
کو ملزم کو خریدنے کے ایام حراست پولیس کے لئے اس کے اسٹیمپ کے  
پس منہ کے لئے اس کے حراست کی یہی ہے کہ حساب کی حراست کو بھی  
جملہ حالات تفتیش میں لگائے ملزم کو تو اس کے لئے اس کے لئے  
ایام کے خرید حراست کے ملزم کو خریدنے کے لئے اس کے لئے

حالیہ میں سے اپنی منہ شخص کی حراست کے لئے اس کے لئے  
جو کہ حراست کے دوران اس کے لئے اس کے لئے اس کے لئے  
اور حساب DSP منہ بھی گرفتاری کے لئے اور ملزم کی انٹاروگیشن کے لئے  
جملہ حالات اس کے لئے اس کے لئے اس کے لئے اس کے لئے  
میں وہ بھی اس کے لئے اس کے لئے اس کے لئے اس کے لئے  
میں اس کے لئے اس کے لئے اس کے لئے اس کے لئے

استعمال میں  
منہ کے لئے  
ASIA  
ASIA حال میں  
2020-05-05







قیمت سرانجام

دولت میں رقم ادائیگی

صلح کر لیں

امدادی ادارہ کی اور رقم 539

سہ ماہی 2020

صفحہ (21)

تاریخ وضع و رقم: 12/8/18

آخر

مبلغ روڈ ریپون فیائنس

؟  
دولت

صوبہ 302-34  
512

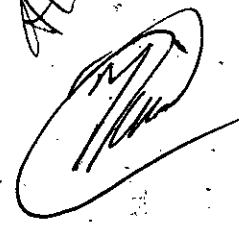
تاریخ وقت کاروباری	ممبر از قدام / چھانسی	مقتضی تفصیل
	مذکورہ: حلقہ پور پور میں ایسی بیرونی سماج محمد رفیق محمد عثمان نے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔	نظام: حنیف خان و دیگر زرداد خان قوم چھانسی کے لکھو
01-5-2020 13:20	1) حنیف خان	مقتضی تفصیل: اور زرداد خان صاحب نے حنیف خان سے حقوق ختم ہونے پر 12 روزہ چھٹی کی 1000 روپے کی رقم میں سے پانچ سو روپے کی رقم ادا کی ہے۔ حنیف خان اور زرداد خان قوم چھانسی کے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ صوبہ 324/34 میں چھانسی قوم چھانسی کے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان الطاف نے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ Asi اس وقت تک سے چھانسی قوم چھانسی کے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان ان کی تفصیل حنیف خان Asi سے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان
19:00	2) Asi	Asi اس وقت تک سے چھانسی قوم چھانسی کے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان ان کی تفصیل حنیف خان Asi سے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان
3) Asi	3) Asi	Asi اس وقت تک سے چھانسی قوم چھانسی کے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان ان کی تفصیل حنیف خان Asi سے لکھو مال و حق روشن آباد سٹرک میل ہوئی ہے۔ حنیف خان اور زرداد خان

Handwritten signature

اب میں ہے کہ ان لوگوں کو اپنی روح تمام کا ہو جائے  
 اللہ اس وقت سے کہ ان لوگوں کو تمام دنیا سے دور کر دے  
 جو ہم 324 میں تمام ہستیوں کو جو زمین و آسمان پر  
 ہے۔ کتب خود تمام ہستیوں کو اپنی روح تمام کر دے۔ جو خود  
 لے کر طبع زندگی و علم کو اجاگر کرے۔ جس سے خود کو انہی کے مطابق بنائے  
 کیا کار و کھلیں گے۔ جس سے خود کو انہی کے مطابق بنائے۔ جس سے خود کو انہی کے مطابق بنائے  
 لے لیں۔ جس سے خود کو انہی کے مطابق بنائے۔ جس سے خود کو انہی کے مطابق بنائے  
 جو انہی کے مطابق بنائے۔ جس سے خود کو انہی کے مطابق بنائے۔ جس سے خود کو انہی کے مطابق بنائے  
 گناہ ہے۔ اس قدر کہ انہی کے مطابق بنائے۔ جس سے خود کو انہی کے مطابق بنائے۔ جس سے خود کو انہی کے مطابق بنائے



01-5-2020

Al-Asad  


(پروٹیکشن کمیٹی کے اجلاس)

2020

20

صفحہ (22) آخر

2020

539

تاریخ: 12/8/18

بگڑے ہوئے ریسٹوریشن

302-34  
512

دراصل

تاریخ وقت  
مکان

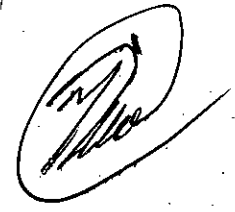
از صفحہ 100 تا 103  
تاریخ: 12/8/18  
بگڑے ہوئے ریسٹوریشن

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09100

1) اس وقت سے کہہ کر...  
2) اس وقت سے کہہ کر...  
3) اس وقت سے کہہ کر...

23150

Alleg





3/30

تھام آنا جا رہا ہے

اسلام پر بار بار شیخ اکبر نے گناہ نہیں کیے اس لیے ساری اقسام کی اسیل  
 رہا ہے۔ اسلام ان پر جو سزا ہے سزا ہے اور ان کے ساتھ ساتھ اس کے ساتھ  
 ہی یہ سزا ہے جس کے ساتھ ساتھ ہی اس کے ساتھ ہی ہے اس کے ساتھ ہی ہے  
 اس کا طریقہ انداز ہے یہاں ہے۔ اس کے ساتھ ہی ہے اس کے ساتھ ہی ہے  
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اسلام پر سزا ہے جو اس کے ساتھ ہی ہے اس کے ساتھ ہی ہے اس کے ساتھ ہی ہے  
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ایمان لانا  
 18/30  
 211/30

Allah












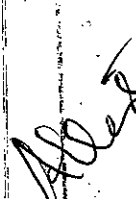

۴  
 قریباً ۲۰۰۰ روپے کی رقم لایا گیا ہے۔ اس کی صورت میں اس پر  
 منظور شدہ رقمیں جو کئی سالوں سے لاپتہ تھیں ان کا منظور کر کے  
 وارنٹ کی جیل ہماری فریاد ملنے کے بعد صرف حفظ قائم ہے تناظر میں استقامت  
 میں وہ کئی سال عدالت کی۔ جو استقامت ملنے کے بعد صرف فریاد ملنے کے عدالت  
 میں داخل کر کے اہم عدالت میں ہیں صرف فریاد ملنے کے ہیں۔

۵  
 اب تک مسلم خلیفہ خان ولایت اور خان خرم خانی لہور میں 35/36 سال تک لڑائی  
 حال میں لڑائی اور لڑائی سے صرف فریاد ملنے کے بعد فریاد ملنے کے بعد فریاد  
 مسلم خلیفہ خان خرم خانی لہور میں 35/36 سال تک لڑائی  
 جیل میں لڑائی اور لڑائی سے صرف فریاد ملنے کے بعد فریاد ملنے کے بعد فریاد

۶  
 اس وقت سے مسلم خلیفہ خان ولایت اور خان خرم خانی لہور میں 35/36 سال تک لڑائی  
 کئی سالوں سے لڑائی اور لڑائی سے صرف فریاد ملنے کے بعد فریاد ملنے کے بعد فریاد  
 حاصل نہیں ہے۔

۷  
 قریباً ۲۰۰۰ روپے کی رقم لایا گیا ہے۔ اس کی صورت میں اس پر  
 لڑائی میں فریاد ملنے کے بعد فریاد ملنے کے بعد فریاد ملنے کے بعد فریاد  
 کئی سالوں سے لڑائی اور لڑائی سے صرف فریاد ملنے کے بعد فریاد ملنے کے بعد فریاد  
 حاصل نہیں ہے۔

  
 Dr. Saleh  
 AM-5-2020  
 ۱۱-5-2020

2) انبار رسول اکرم صلی الله علیه و آله و سلم 20-5-2

Amree - E

1) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

2) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

3) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

4) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

5) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

6) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

7) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

8) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

9) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

10) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

11) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

12) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

13) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

14) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

15) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

16) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

17) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

18) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

19) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

20) والد زرداد خان و لایعین زرداد خان خرم بختان سنه 1281

۱) من آخرت کرانہ و انہ میں صلاز حج  
۲) اصفہان - قزوین حکومت کی کئی میں صلاز حج

۳) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں  
۴) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۵) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۶) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۷) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۸) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۹) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۱۰) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۱۱) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۱۲) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۱۳) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۱۴) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

۱۵) اصفہان و لامعلی اکثریت کی صلاز حج اور انہ میں

Adalat

2

سوال نمبر ۱۰: روحانی اطلاع کون سے ذریعے سے ہوتی ہے؟

جواب: روحانی اطلاع فریب و لالچ سے نکلنے والی ہے جس میں سارا اللہ  
میں بعض فریب لگایا ہوا ہے۔ اس کے لئے اوصاف مذکورہ درجہ  
حق کا لگنے اور اطلاع کا براہ راست سفر شمار ہے۔ اس کے نتیجے میں  
میں یہ چل گیا

سوال نمبر ۱۱: اگر تمہیں اطلاع ملے کہ تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

جواب: میں نے ڈاکٹر اخوان و دیگر حضرات سے کئی بار اس بارے میں سوال کیا ہے  
یہ اس بارے میں کہ اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے۔ ان کا جواب ہے کہ اگر تمہاری جان خطر میں ہے تو تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے۔

سوال نمبر ۱۲: روحانی اطلاع کون سے ذریعے سے ہوتی ہے؟

جواب: روحانی اطلاع کون سے ذریعے سے ہوتی ہے؟  
سوال نمبر ۱۳: اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

جواب: اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

سوال نمبر ۱۴: اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

سوال نمبر ۱۵: اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

جواب: اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

سوال نمبر ۱۶: اگر تمہاری جان خطر میں ہے تو کیا تمہاری جان بچانے کے لیے  
کچھ کرنا چاہیے؟

سوال 12: جو ہمیں اس سوال میں دل چاہتا ہے کیا اس میں ہے؟  
جواب: جی ہاں، علم ہے۔

سوال 13: بروز و ختم من میں رسول سے خاص کر کئی دفعہ دعا پڑھتی ہیں کیا اس میں ہے؟  
جواب: میں لڑتے وقت دعا پڑھتی ہوں۔

سوال 14: میرے ہفت روزہ کے دوران میں کئی دفعہ دعا پڑھتی ہیں کیا اس میں ہے؟  
جواب: ہاں، دعا پڑھنا بہتر ہے۔

سوال 15: لہذا جو ہم نے جو دعا پڑھی ہے اس میں کیا ہے؟  
جواب: دعا پڑھنا بہتر ہے۔

سوال 16: اگر ہم دعا پڑھیں تو دعا پڑھنے سے دعا پڑھنے کا کیا ہے؟  
جواب: دعا پڑھنا بہتر ہے۔

سوال 17: دعا پڑھنے سے دعا پڑھنے کا کیا ہے؟  
جواب: دعا پڑھنا بہتر ہے۔

سوال 18: دعا پڑھنے سے دعا پڑھنے کا کیا ہے؟  
جواب: دعا پڑھنا بہتر ہے۔

سوال 19: دعا پڑھنے سے دعا پڑھنے کا کیا ہے؟  
جواب: دعا پڑھنا بہتر ہے۔

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صالح علی خاں

23 رپورٹ علی حدتہ اول

تاریخ

سال 2019 مئی 18

تعمیراتی

539 رپورٹ

تعمیراتی

309 / 34

12/8

تعمیراتی

حالات مختلفہ

تاریخ	کار
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دریہ سیمہ پرویز ان کی بیوی نواح محمد خان قوم بھٹان سکنہ  
 ننگر پارل حال حدتہ روٹ آباد کھری لود  
 بنامہ خالوین خان والدین محمد خان قوم بھٹان سکنہ ننگر پارل

1 ختم ہوا  
 مقدم عدالت میں ملزم بالہ بند جیل کھری لود ہے  
 مقدم میں قبل ازیں دوران گرفتاری ملزمان اور گواہوں کے  
 قریبی رشتہ داروں کی مدد سے ایف آئی جی کے حکم پر ان کے  
 ملزمان خالوین خان - حبیب - باسر اور گواہوں کے  
 عدالت خان کی CDR لیڈر جمعیہ ایف آئی جی کے حکم پر  
 قریبی رشتہ داروں کی مدد سے ایف آئی جی کے حکم پر  
 ایسی طرح ملزم یا سرگرمیوں کی روایت و قریبی رشتہ داروں  
 خالوین خان اور گواہوں کے عدالت خان کی CDR کے  
 متعلق CDR ننگر پارل ایف آئی جی کے حکم پر  
 Acknowledge please وصول ہو گیا ہے۔ CDR کے  
 قریبی رشتہ داروں کی مدد سے ایف آئی جی کے حکم پر  
 قریبی رشتہ داروں کی مدد سے ایف آئی جی کے حکم پر  
 قریبی رشتہ داروں کی مدد سے ایف آئی جی کے حکم پر

S/O: P.S.S. Saleh  
22-08-09

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ملعق چھڑی لود

تھکی 20

لیڈ ٹھکی چھڑی اول سال 2019

239

تھکانہ میں آد

12/8

تھکانہ سے روانگی

302 / 34

بوت چھانٹ

حالات نمونہ

مرتبہ: نیک شد 21 تھکانہ سے

از تھکانہ

در لیج پیمائے پروگرام کی پورے نتائج کے مطابق قومی پیمانے کے  
تکڑیاں حال کے دوران ایماڈ کنٹرول جیل پری لود  
نیما: خانہ خانہ و لیسرود خانہ قومی پیمانے کے تکڑیاں

حالیہ حالات ایسے ہیں کہ کوئی نیکوئی نہیں مل رہی ہے۔  
خانہ خانہ کی حالت ایسے ہے کہ جو تھکانہ کے لئے اور  
خانہ خانہ کی حالت ایسے ہے کہ جو تھکانہ کے لئے اور

خانہ خانہ کی حالت ایسے ہے کہ جو تھکانہ کے لئے اور  
خانہ خانہ کی حالت ایسے ہے کہ جو تھکانہ کے لئے اور

خانہ خانہ کی حالت ایسے ہے کہ جو تھکانہ کے لئے اور  
خانہ خانہ کی حالت ایسے ہے کہ جو تھکانہ کے لئے اور

تھکانہ  
وقت  
2019

18:00

18:30



ORDER.

It is to dispose of the charge sheet issued to ASI Muhammad Nazir, who while posted as IO PS Sarai Salah deliberately ignored important elements in the investigation of a murder case registered vide FIR No. 539 dated 12.08.2018 u/s 302/34 PPC PS Sarai Salah. He was alleged that he failed to properly interrogate the accused, effectuate recovery of weapon of offence, the motorcycle used in the offence and pointation of the crime scene from the accused.

He was charge sheeted and SP Investigation, Haripur was directed to conduct a detail enquiry. SP Investigation after thorough enquiry submitted a report vide 48/PA dated 29.05.2020, in which the officer was held guilty of the charges and recommended for punishment.

Today the officer was heard in person in the OR. Enquiry report and the case file were perused in detail. The facts of the case are that on 12.08.2018 one Imraj s/o Taj Muhammad Khan r/o Langrial was killed due to old enmity. Khanwaiz Khan, Afsar Khan, Muhammad Yasir, Hanif Khan and Gul Faraz Khan were nominated as accuseds. Consequently, FIR No. 539 dated 12.08.2018 u/s 302/34 PPC was registered in PS Sarai Salah against them. Accused Khanwaiz was arrested on 07.08.2019, Afsar Khan on 04.02.2020 and Muhammad Yasir on 30.11.2019. They were Challaned to the court and they are still behind the bars as the court did not release them on bail.


Mother of the deceased Imraj s/o Taj Muhammad Khan, a decrepit old woman appeared before the undersigned and requested for security as the remaining accused Hanif Khan and Gul Faraz Khan, who were still at large were threatening her of dire consequences. She also showed her complete inconfidence in local police of PS Sarai Salah. Consequently the task of tracing the accuseds was assigned to a special team of Police Station City which successfully traced Hanif Khan and arrested him from Rawalpindi. He was brought and handed over to Investigation Staff for further legal proceedings. ASI/IO Muhammad Nazir was clearly directed to ensure quality investigation being Officer Incharge by completing all legal formalities. However, the officer didn't bother and failed to interrogate the accused Hanif Khan about the crime. Similarly he failed to effectuate any recovery of weapon of offence and the motor cycle used in the crime. More blatantly he has failed to make pointation of the crime scene from the accused despite getting his two days physical remand. The accused was thus sent on judicial remand to jail without establishment of his linkage with this murder case. The officer malafidely and with ulterior motives destroyed a very important case of heinous crime of murder which is a serious misconduct. The ignobility and professional dishonesty is floating on the surface of his whole conduct which has not only caused a serious miscarriage of justice but also brought a bad name for Police department. Therefore, I, Syed Ashfaq Anwar (PSP), District Police Officer, Haripur being competent authority under the Khyber Pakhtunkhwa, Police Efficiency and Discipline Rule 1975, am fully satisfied that ASI Muhammad Nazir, committed gross misconduct. Therefore, he is awarded major punishment of "DISMISSAL FROM SERVICE" with immediate effect.

Order announced.

Order Book No. 439  
Dated 05-06-2020

P.R.

*Enacted 2020*

*Resd*  


Syed Ashfaq Anwar, PSP  
District Police Officer,  
Haripur

26

Amree, 'H'

BEFORE HONOURABLE REGIONAL POLICE OFFICER,  
HAZARA REGION, ABBOTTABAD.

Appeal by Mohammad Nazir Ex-ASI No. H/215  
P.S. Sarai Saleh, District Haripur

DEPARTMENTAL APPEAL AGAINST ORDER OB NO. 439 DATED 05-06-2020 OF THE DISTRICT POLICE OFFICER HARIPUR WHEREBY APPELLANT HAS BEEN AWARDED WITH MINOR PENALTY OF "DISMISSAL FROM SERVICE".

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL IMPUGNED ORDER DATED 05-06-2020 MAY KINDLY BE SET ASIDE AND APPELLANT BE RE-INSTATED IN SERVICE FROM THE DATE OF DISMISAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

With humble submission the following few lines are laid down before your Highness for kind consideration and favorable order please:-

1. That while appellant posted as ASI/IO Police Station Sera-e-Saleh (Haripur) was served upon with a Charge Sheet dated 06-05-20 with the following allegations that"

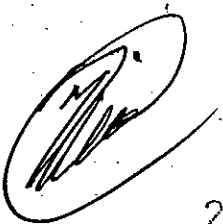
"while your posted as IO PS Sarai Saleh, a PO Mr. Hanif s/o Haji Zardad r/o Langrhyal, a nominated accused in case vide FIR No.539 dated 12-08-2028 u/s-302/34 PPC PS Sarai Saleh was arrested by a special team of city police from Rawalpindi. However you committed the following irregularities in the investigating the case i.e:

- You failed to properly interrogate the accused.
- You didn't make pointation of the crime scene.
- You didn't recover the weapon of offence.
- You failed to recover the vehicle used in the offence.

Your this act is a severe violation of discipline, a seniors professional dishonesty and a shows that you are not following the law, gross misconduct in ferms Police E & D Rules 1975, hence charge sheeted".

2. That the aforementioned Charge Sheet was duly replied on 11-05-2020 explaining all facts and circumstances of the matter in detail and denying the allegations incorporated therein against the appellant being

Amree




incorrect and baseless. (Copies of Charge Sheet & its reply are attached as "A & B").

3. That on 01-05-2020, Mohammad Javed SI/Oll PS Sarai Saleh was busy in case FIR No. 347 dated 28-04-2020 u/s-365 PPC at District Khanawal for recovery, abductee Mst. Robina Bibi and the arrest of accused Ghulam Hussain s/o Mohammad Ramzan r/o Chak No.ER-124/7 Mian Chunnun at District Khanawal. He telephonically informed the appellant about the arrest of accused Hanif in a case u/s-324 from Rawalpindi and he would be produced before the court at Haripur. His arrest/custody should also be asked from court in case FIR 539 dated 12-08-2018 u/s-302 PPC PS Serai Saleh Haripur and to investigate him.
4. That on 02-05-2020, Fazal Manan ASI produced accused Hanif in a case u/s-324 PPC before the judicial Magistrate for physical custody. Appellant arrested accused from court area Haripur and secured his 02 days custody from Judicial Magistrate Haripur in case FIR No.539 dated 12-08-2018 u/s-302/34 PPC. The DSP Circle and SHO PS Sarai Saleh were duly informed with regard to physical custody of accused Hanif. (Copy of FIR No.539 dated 12-08-2018 is attached as "C").
5. That accused Hanif was minutely and thoroughly interrogated, all enthusiastic efforts were made, but accused remained adamant to his innocence and non-involvement in the case. He did not disclose anything about the crime. Day to day interrogation and facts were regularly brought to the notice DSP Circle (CIO)

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and SHO PS Bashir Khan. The entire investigation was carried out under the control, surveillance, directions and guidance of the DSP Circle (CIO) as he was a direct invigilator of the entire investigation in accordance with OG-25. (Copies of Zimni No.21, 22, 23 and 24 are attached herewith as "D").

6. That ultimately the DSP Circle(CIO) and SHO PS Sarai Saleh Bashir Khan themselves personally interrogated the accused Hanif minutely and thoroughly but nothing fruitful could be brought to surface and the accused as usual claimed his innocence and non-involvement in the case under investigation.
7. That on 03-05-2020 after completing his task of FIR No. 347 dated 28-04-2020 u/s-365-B, and on return to PS, the Oll Mohammad Javed Sub Inspector, in presence of appellant and SHO PS Sarai Saleh negotiated DSP Circle (CIO) and secured his guidance about ongoing situation of the case. In the light discussion and guidance of DSP Circle the accused Hanif on expiry of 02 days custody was produced before the Judicial Magistrate Haripur on 04-05-2020 and 05 days further custody was sought through Public Prosecutor but the same was not allowed and accused was sent to jail on judicial remand. The entire facts were brought in the notice of Superintendent of Police (Investigation) Haripur as well.
8. That accused Hanif was interrogated to a great length putting under different questions to extract something if he was involved in the case but nothing could be found helpful. He remained clung to his stance of innocence

*Alisid*  





and non-involvement in the case under interrogation. So far as the attribution of Motor-cycle to accused Hanif is concerned, neither he has any motorcycle nor can drive the same. (Copies of questions and answers sheets are attached as "E").

9. That during the investigation no one came forward from the place of occurrence or otherwise to depose against accused Hanif that he was involved in the instant case. Though accused Hanif has a house in village Langriyal but he did not live there. He, for the last about 24/25 years, along with his family has been residing in Rawalpindi and does a job as Milkman in a Buffaloes Farm. Accused Hanif has been involved in the instant case that previously one Mazhar Khan the son of Afsar Khan and brother of Yasir Khan was murdered in which case deceased Imraj alis Sharka was directly charged and accused Hanif was the friend of deceased Mazhar Khan.

10. That though accused Hanif was charged by the complainant but during investigation nothing could be recovered. During the early investigation by Naik Mohammad SI/Oll it was found that eye-witness Asmat Khan of the case at relevant time was not present at the place of occurrence rather he was found at village Lanriyal far flung from the spot. The entire proceedings with regard to investigation and interrogation of accused Hanif are in the knowledge of DSP Circle (CIO) and SHO Police Station Sarai Saleh and S.P. (Investigation). Nothing has been suppressed from the High-ups.

*Alisid*  


11. That in the light aforementioned facts and circumstances of the matter, the appellant has been wrongly been involved in the instant case and has been awarded with the major penalty of "Dismissal from Service" without any reason, justification or mistake on the part of appellant rather on illegal, unlawful basis, against departmental rules and regulations and the facts rather on whimsical, cursory, arbitrary and malafide grounds.
12. That no proper departmental inquiry was conducted to prove the allegations against the appellant and swift the grain from the chaff. No Show Cause Notice was issued to him. Copy of inquiry findings, if any, was never provided to him. Even opportunity of personal hearing was not afforded to the appellant. But the appellant has been awarded the punishment of "Dismissal from service" vide District Police Officer Haripur order dated 05-06-2020 without any reason and justification. (Copy of order dated 05-06-2020 is attached as "F").
13. That through out his long services of more than 27 years there is no complaint from any corner against appellant. He always performed his assigned duties with devotion, dedication and honesty to the entire satisfaction of his officers. Appellant has meritorious service record at his credit.
14. That appellant has rendered more than 27 years service in the police department and he has investigated hundred of cases of difference species which are on the record of police department as a token of proof and


*Alvish*  




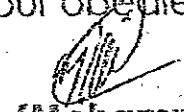
example for the coming police officials. Appellant has been awarded Commendation Certificates and Cash Rewards by the Police High-ups on different occasions for his tremendous service in the department. Appellant is a well experienced, educated and a very senior qualified police officer. But it is not only astonishing one rather pathetic and sorrowful that the District Police Officer Haripur without any reason has crushed 27 years service of the appellant with a single stroke of his pen and that too without caring anything about appellant past service and has been rendered without job to suffer starvation alongwith his entire family.

- 15. That if the appellant is afforded with the opportunity of personal hearing he will really prove him as innocent by adducing credible facts of the matter.

Sir, in view of the facts and circumstances narrated here above, it is earnestly prayed that impugned order dated 05-06-2020 of the District Police Officer Haripur may kindly be set aside and the appellant be re-instated in his service from the date of his dismissal with all consequential service back benefits. Thanking you sir in anticipation.

*Accepted*  


Your obedient Servant



**(Mohammad Nazir)**  
**S/O Roshan Din**  
**Ex-ASI No. 215**  
**Police Station Sarai Seleh**  
**Haripur**

Village: Akhrila, PS Nawansher  
Tehsil & District: Abbottabad  
Cell No. 0314-3636398  
0314-5027727

Dated: 16-06-2020



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Amere - 9

OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD  
0992-9310021-22  
0992-9310023  
r.rpohazara@gmail.com  
0345-9560687  
NO: 18290 /PA DATED 03/8/2020

ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex.ASI Muhammad Nazir No.215 of District Haripur against the order of punishment i.e. *Dismissal from service* awarded by District Police Officer, Haripur vide OB No.439 dated 05.06.2020.

Brief facts leading to the punishment are that the appellatant while posted as IO PS Sarai Salah deliberately ignored important elements in the investigation of a murder case registered vide FIR No.539 dated 12.08.2018 u/s 302/34 PPC PS Sarai Salah. It was alleged that he failed to properly interrogate the accused, affect recovery of weapon of offence, the motorcycle used in the offence and pointation of the crime scene from the accused.

The appellatant was issued charge sheet alongwith summary of allegations and SP Investigation, Haripur was deputed to conduct departmental enquiry. During the course of enquiry the allegations leveled against the appellatant were proved and EO recommended him for major punishment. He was heard in person, however he failed to advance any cogent reason in his defence. Consequently, DPO Haripur awarded him major punishment of dismissal from service.

After receiving his appeal, comments of DFO Haripur were sought and examined/perused. The undersigned called the appellatant in OR, heard him in person and examined the available record. ASI Nazir Khan being IO of the case could not be exonerated from allegations of defective investigation. However, keeping in view his prolong service, I take lenient view and in exercise of the powers conferred upon the undersigned under Rule 11-4 (c) of Khyber Pakhtunkhwa Police Rules, 1975 major punishment of dismissal from service is set aside and *converted into major punishment of reduction in rank from ASI to IIC* with immediate effect. The period during which the appellatant remained out of service may be treated as leave without pay.

Attested

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

No. 18291 /PA, dated Abbottabad the 03/8/2020.  
CC.

The District Police Officer, Haripur for information and necessary action with reference to his office Memo No 3602 dated 14-07-2020. Service Roll and Fuji Missal containing enquiry file of the appellatant is returned herewith for record.

DBA No: 201

S.No: 73828

BC No:

Name of Advocate: محمد اسماعیل سندھ

وکالت نامہ



بعدالت: محمد اسماعیل سندھ  
 عنوان: نام: محمد اسماعیل سندھ  
 منجانب: سرگن اسد  
 نوعیت مقدمہ: سرگن اسد  
 باعث تحریر آنکھ: سرگن اسد

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصدیق مقدمہ بمقام سرگن اسد کے لیے  
 کہہ رکھا گیا ہے۔

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت  
 پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہوا اور مقدمہ میری  
 غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب  
 موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ  
 ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے  
 پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب  
 موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر ساختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو  
 عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی  
 اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور  
 اس کے ثالثی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از کچہری صدر  
 اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب  
 موصوف کو بشرط ادائیگی علیحدہ مختانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ  
 مزکور یا اس کے کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو  
 بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ  
 التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب  
 موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے  
 برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ: 17 / 08 / 2020  
 دن / ماہ / سال

محمد اسماعیل سندھ

محمد اسماعیل سندھ