## FORM OF ORDER SHEET

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	Court c	of		
	Case No256/2023			
S.No.	Date of order i proceedings	Order or other proceedings with signature of judge		
1	2	3		
]-	31/1/2023	The appeal of Mr. Wali Ullah resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar onPareha Peshi is given to appellant/counsel.		
		By the order of Chairman REGISTRAR		

The appeal of Mr. Wali Ullah son of Muhammad khan Driver Constable no. 568 Police Station Town ship Bannu received today i.e. on 25.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Annexures of the appeal be attested.
- 5- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 6 Pages nos. 11 to 14, 17,21 & 22 of the appeal are illegible which may be replaced by legible/better one.
- 7- Wakalat nama in favour of appellant be placed on file.

Re-no-itte

8- Four more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

/S.T, /2023 26-01

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REGISTRAR

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Saadullah Khan Marwat Adv. High Court at Peshawar.

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## BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

5.A. No. 256 /2023

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Wali Ullah versus RPO & Others

S. No	Documents	Annex	P. No.
1.	Memo of Appeal		16
2,	FIR dated 03-10-2021	"A"	7-8
- 3.	Show Cause Notice dated 13-10-2021.	"B"	9
4.	Reply to Show Cause Notice, 14-10-21	"Č"	10
5.	Enquiry report	"D"	11-14
6.	Final Show Cause Notice, 11-11-21	"E"	15
7.	Reply to FSCN dated 12-11-2021	"F"	16
8.	Dismissal order dated 18-05-2022	"G":	17
9.	Reinstatement of co-employee dated 18-05-2022	"H″	18
10.	Representation dated 23-05-2022	"I"	19
11.	Observation on appeal dated 20-06-22	״ן״	20
12.	Enquiry report dated 29-07-2022	"K",	21-22
13.	Service Appeal No. 1431/22		23-26
14.	Reinstatement order dated 30-12-2022	"M"	27-28
15.	Withdrawal order dated 12-01-2023	"N"	29

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Appellant Through

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Saadullah Khan Marwat Advocate 21-A, Nasir Mansion, Shoba Bazaar, Peshawar

Shoba Bazaar, Peshawar Ph: 0311-9266609

Dated: 25-01-2023

**BEFORE KPK SERVICE TRIBUNAL PESHAWAR** 

S.A No. 256 /2023

. Respondents

Wali Ullah S/O Muhammad Khan,Kitcher Polettichwa<br/>Service Polettichwa<br/>

Versus

Regional Police Officer, Bannu Region, Bannu.

 District Police Officer, Lakki Marwat . . . . . .

> ⇔<=>⇔<=>⇔<=>⇔ APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST OB NO. 384, DATED 30-12-2022 OF R. NO. 01, WHEREBY APPELLANT WAS REINSTATED INTO SERVICE WITH IMMEDIATE EFFECT AND PERIOD OF DISMISSAL / OUT OF

> > ⇔<=>⇔<=>⇔<=>⇔<=>⇔

EFFECT AND PERIOD OF DISMISSAL / OUT C

1.

#### Respectfully Sheweth;

- 1. That appellant was appointed as Driver Constable on 30-05-2007 and served the department to the best of his ability and to the entire satisfaction of the superiors.
- That on 03-10-2021, FIR No. 1327, Police Station Lakki Marwat u/s 302/34 PPC was registered against PASI, Naveed Nawaz for murder of Aleemn Shah. (Copy as annex "A")

3. That on 13-10-2021, appellant was served with Show Cause Notice . on the allegation that:-

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- That on the event of full day you followed Naveed Nawaz to
  the crime scene and now you are hiding facts which shows your connivance with the accused.
- ii. That all speaks gross misconduct on his part and liable to be punished under Police Rule 1975. (Copy as annex "B")
- 4. That on 14-10-2021, appellant replied to the Show Cause Notice and denied the allegations. (Copy as annex "C")
- 5. That enquiry into the matter was initiated against appellant but the same was not conducted as per the mandate of law because no statement of any witness(s) was recorded in presence of appellant nor he was afforded opportunity of cross examination what to speak of self defense. No punishment for imposition upon him was suggested what to speak of major punishment of dismissal from service. (Copy as annex "D")
- That on 11-11-2021, appellant was served with Final Show Cause Notice, without supply of enquiry proceeding to appellant which was also replied on 12-11-2021 and denied the allegation. (Copy as annex "E" & "F")
- That on 18-05-2022, major punishment of dismissal from service was imposed upon appellant without taking into consideration the facts and circumstances of the case by R. No. 02. (Copy as annex "G")
- 8. That on 18-05-2022, Co-Employee, Fahim Ullah having same role and conduct in the matter was exonerated from the charges, despite the fact that he was equally held responsible in the matter was given minor punishment of stoppage of increment. (Copy as annex "H")
- 9. That on 23-05-2022, appellant submitted representation before R.
  No. 01 for reinstatement in service with all back benefits which met dead response till date. (Copy as annex "I")

10. That on the departmental appeal, R. No. 01 passed order for reenquiry in the criminal case with remarks:-

"Please re-enquire into it and find the actual role of the officers in incident vide letter dated 20-06-2022". (Copy as annex "J")

- 11. That on 29-07-2022, Additional Superintendent of Police Bannu held re-enquiry into the matter whereby in the recommendations it was held in categorical manner that all the 06 police officials are recommended for exoneration from the charges leveled against them. (Copy as annex "K")
- 12. That on maturity of the case, appellant filed S. A. No. 1431/22 before the hon'ble Tribunal which was admitted to regular hearing and notice of the same was issued to respondents for reply. (Copy as annex "L")
- 13. That in the meanwhile, re-enquiry was conducted into the matter and the appeals already submitted before the authority was accepted and they were reinstated into service with immediate effect and period of dismissal / out of duty was treated as leave without pay vide order dated 30-12-2022. (Copy as annex "M")
- 14. That in the meanwhile, the aforesaid appeal before the hon'ble Tribunal came up for hearing on 12-01-2023 and then in the light of the fresh recommendation dated 30-12-2022 was withdrawn with permission to file a fresh one. (Copy as annex "N")

Hence this appeal, Inter Alia, on the following grounds;

#### <u>GROUNDS</u>

- a. That from the FIR dated 03-10-2022, it is very much clear that Naveed Nawaz apprehended one Almeen Shah with pistol and arrested him at the spot. One Johar Muhammad son of Dilawar Shah posing himself to be the leader of PTI of the locality, made hot words with the said PASI for arresting the said culprits.
- b. That the said deceased whirled message on Face book ID against the said PASI that he is harassing handsome people. The said PASI went to village Dalo Khel and killed the said Aimeen Shah at the same time, appellant was at police post, Lakki Marwat.

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- c. That appellant never facilitated the said PASI in the commission of offence and it was his own act, if any.
- d. That charges leveled against appellant has no nexus with the same as he never facilitated the said matter.
- e. That the matter was not dealt with as per the mandate of law because neither any statement of any witness(s) was recorded in presence of appellant nor he was afforded opportunity of cross-examination.
- That appellant was unaware as to whether the said PASI is going for checking to Hospital or for going to other purpose,
- g. That enquiry conducted in the matter but no punishment was ever suggested by the Inquiry Officer to impose the same upon appellant, what to speak of major punishment of dismissal from service.
- h. That the authorities never dealt with the matter as per the record and circumstances and for no obvious reason, appellant wasimplicated in the same.
- That in similar circumstances, constable Fahim Ullah was exonerated from the charges by R. No 02 at the recommendation of Political vendetta and appellant was awarded with major punishment of dismissal from service.
- j. That on representation of appellant fresh enquiry was conducted and in the recommendation the enquiry officer held in the enquiry report and recommended for exoneration from the charges leveled against them. In the circumstances, no punishment was required under the law.
- k. That though R. No. 01 issued the impugned order whereby the appeals of the officials were accepted, they were reinstated into their services with immediate effect and period of dismissal / out of duty was treated as leave without pay.

That when appellant was reinstated into service in pursuance of reenquiry report dated 29-07-2022 then no legal justification ever exists to be not reinstated appellant into service with all back benefits even double punishments were imposed, i.e. reinstated into service with immediate effect instead of from the date of dismissal from service and period of dismissal / out of duty was treated as leave without pay.

- m. That appellant never absented from duty but it was the illegal order of respondents where he was kept away from duty.
- n. That after exoneration from the so called criminal charges, no stigma ever exists and the impugned order is not only illegal but is based on malafide and discrimination as one Faheem Ullah Constable was not treated at par with appellant.

It is, therefore, most humbly prayed that on acceptance of the appeal, order dated 30-12-2022 of the R. No. 01 be set aside to the extent of double punishments i.e. reinstatement in service with immediate effect and period of dismissal / out of duty was treated as leave without pay.

wa

Appellant

Through

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Saadullah Khan Marwat

Arbab Saiful Kamal

Amjad Nawaz Advocates

Dated: 25-01-2023

## AFFIDAVIT

I, Wali Ullah S/O Muhammad Khan, Driver Constable No. 568 Police Station Township Bannu (Appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief.

DEPONENT

## CERTIFICATE:

As per instructions of my client, Service Appeal No. 1431/22 has earlier been filed by the appellant before this Hon'ble Tribunal which was later on withdrawn to file a fresh one.

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ADVOCATE

<u>مر</u>	اېرېرك 🕺 🐴	- 20 - 3 - 10	ንላ
	س ر بورث شده زیردند، ۱۵۴ مجموعه ما ابلد وجداری	ابتدائي إطلاع نسبست جرم مّابل دست انداز كابولي	
	لكيمر وت	. کې د لي	آمانہ
_	م وتت وتوعد 10.02 أوتت 12.20 بجد	1329	ا مر
	03.10.021 دمت 12.50 بجه جاكيدگى	تاريخ و وتت ر يورث	_1
	03.10.021ومتت 13.50 بجه		
	حنيف شاه دلد عاليين شاه سكنه ابا خيل بعمر 31/32 سال	نام سكونت اطلاع د جنده مستغيث	_1
I L	PPC 302/34	مختركينيت جرم (معددند) حال اكر كمحليا كمابو-	<u>_r</u>
	بيضك اذان محمرنو رمحه خان وانتعدداد فيل جانب غرب	جائے وتوعدفا مسلمة تعاند سے اور سمت	_r
	جنوب8/9 كلويثراز تعانه		
	ا_نويدنوادا _عركل عرف مرك بسران كل نواز سكنهدلد خيل	نام سکونت لمزم	_0
ſ	برسيدكى مراسله يرجركز ادش ديدوث جاك كياحميا	كاردائي بتنتيش ب متعلق كالم الراطلاع كرف	۲
Į		عر او تف بوالويد بيان كره	
	بمزله البيش لميجر	تحاسب رذاتگی کی تاریخ و دنت	_2

ابتد الى إطلارع بيتيج ورب كروب أيك تحريرى مراسلدد بورث منجانب نور اسلم خان ASHO بغرض قائى مقدمه بدست كسميل عالمكير 603 موصول موكر ذيل ، . . ريور ف حليف شاه ولد عالمينشاه سكنه ابا خل المر 31/32 سال CNIC نمبر 112015337131-5 دالط نبر 3008306607 آج مودند 03.10.02 بوتت 12.50 بجد بمقام ٹی سپتال کی مردت بروجود کی تخش دالد اش غالین شاہ ہمر 51/52 سال ہوں ریودٹ کرتا ہے کہ امردز میں دالد ام باردن ابشد دلدگل با دشاه سکندا باخیل جو برمحد کے بیٹھ گئے جو برمحد خان کا انتظار کرد ہے ہے دالدام عالمین شاہ علجدہ جار پائی پر بین کے برآ دے میں بیٹا تھا جکر سائر پرددمری جاریا کی پر میں ادر باردن الرشد بیٹے تھے۔ بوت تریب 12.20 بینک کے چھوٹے دردازہ سے ادیدنواز جوکہ پولیس کی دردی میں ملبوس تھا جکہ اس کا بھا کی عمرٌ تل عرف مرک بسران گلنواز ساکنان دلا خیل اندر بیشک آئے دونوں کے پاس کلاشنکوف ہائے تھے نویدنواز نے فورا اپنے کلاشنکوف سے دالدام پر فائرنگ شروع ک جمن ب دولك كرچاريائى بركر بردا جبار عمركل ف ويدنواز ، فانزنك ، دوران ام براي كلاشكوف ايم كا وكما بعد دقوعه الزبان بينحك مت نكل محك ادربهم بوجد خال باتحة تجمونه كرسك اسكفور ابعدجو برحمد خان دلدداد ودخان سكنه دلوض امي كمرب بین ال کرمید مار ادر ہم نے دالدام کوسنجال کرجو ہر تدخان کے گاڑی میں ڈال کرمید حامثی سپتال کی سے آئے سکر دالد ام زخول کی تاب ندلا کرداستہ میں جان بحق ہوا تھا۔ وجہ عدادت یہ ہے کہ دالدام نے اپنے نیسک پر اسرداز ددعہ سے کھ دریال ملزم نویدنواز کے خلاف جو ہر دلڑکوں کو تنگ کرنے ادر بلیک میل کرنے کا پوسٹ چلا تا مواجس پر دتوعہ بترا ردنما ہوا ہے۔ دتوعہ بذا میرے علاد، رشتہ دارم ام بارون الرشید دلدگل بادشا، سکنہ دیمہ آم ے بچشم خود دیکھا۔ میں دالدام کے آس کرنے کا برخلاف نو مدنوا زاسلچہ ایم کرنے ،غرض مشتر کہ ادادہ قبل کرنے کا برطاف ملزم عرکل عرف میرک کی دعویدار ہوں۔العبد دسخط انگریز ک مدتک کارردائی پولیس حسب آیده اطلاب سی سیتال مردان آ کر عدمی بالاکی ریودٹ صبط تحریر میں لا کر پڑ حکر سایا سمجھا پا کمیا ۔ درست سائیم کر کے زیر دیود دانباد سخط ثبت کیا۔ جس کی میں تقد یق کرتا ہوں۔ مقتول کا نقشہ ضرر فر دصورت حال مرتب کر کے بتر ترخی پوسٹ مارٹم زیر تعاظمت کنٹیں نجیب امیر 160 حوالہ ڈاکٹر صاحب کیا جاتا ہے۔ پیشون ر پودٹ سے صورت جرم PPC 202/34 کی پالک جاتی ہے۔ داختی رہے کہ نوید نواز PASI نچارن چوک ٹی تعینات ہے۔ مراسلہ بغرض تائی مقدمہ بدست کنٹیل عالمگیر 203 ارسال تعان ہے۔ الکاسان سے تغیش کیجا دے۔ دستخط انگر مزکی نوراسلم خان ASHO تعانہ کی مورخہ 2021. 10.202 کا در دائی تعان ہے۔ الکاسان سے تغیش کیجا دے۔ دستخط انگر مزکی نوراسلم خان ASHO تعانہ کی مورخہ 2021. 10.202 کا در دائی تعانہ ہیں آئدہ مراسل حوف بحرف در دن جالا ہو کر برچہ بخر کی الا بمز لہ آسیش ر پورٹ چاک ہو کر نقذ لہ FIR مراد تعیش حوالہ انچار دن الکاساف کی کے جاتا ہیں۔ پرچہ برز لہ انجن کا در دائی ہو کہ جاتا ہیں۔ پرچہ برز لہ آسیش ر پورٹ گر دائیں ہو کہ مراسلہ من کہ کھا

ASI PS LM 03.10.021

### OFFICE OF THE DISTRICT POLICE OFFICER LAKKI MARWAT No.<u>6585/SRC.</u> Date: <u>13-10-2021</u>

### SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

WHEREAS; you Driver Constable Wali Ullah No. 563 while posted at PP City Lakki were found indulge in the following allegations:-

A WOC

- 1. That on the event of full day you followed Naveed Nawaz to the crime scene and now you hiding facts which show your connivance with the accused.
  - That all speaks gross misconduct on his part and liable to be punished under Police Rules-1975.

You are therefore, found guilty of misconduct, as the defined in section 2 (III) of KPK Police Rules-1975 and as such are liable to action under section 2 of the said rules.

Based on the above facts, I am satisfied that no enquiry is needed in this case as contained in section 5.3 clauses (a) & (c) under the said rules.

Now, therefore, you Driver Constable Waii Ullah No. 568 are called upon under section 4.1 of the KPK Police Rues 1975, to show cause within 07 days of the issuance of this notice, as to why one or more penalties including major penalty of dismissal from service should not be imposed upon you.

NOTE:-

Take notice that if you failed to submit reply in compliance of this show cause notice within the stipulated time, it will be presumed that you have acting to offer in your defense and in that case, an expert action shall straightaway to taken against you without any further notice.

Sd/-

District Police Officer

Lakki Marwat

OFFICE OF THE DISTRICT POLICE OFFICER. 'SRC Date <u>// \_/10/2021</u>

## HOW CAUSE NOTICE UNDER POLICE RULES 1975.

WHEREAS, you Driver Constable Wall Ullah No. 563 while pested at the City Lakki were found indulge in the following allegations:-

1. That on the event of full day you followed Navced Nawaz to the crime score and now you hiding facts which show your connivance with the accused.

2. That all speaks gross misconduct on his part, and liable to be punished under Police Rule-1975.

You are therefore, found guilty of misconduct, as the defined in section 2 (III) of KPK Police Rules 1975 and as such are liable to actio 1 under section 5 of the said Rules.

Based on the above facts, I am satisfied that no enquiry is needed to this case as contained in section 5.3 clauses (a) & (c) under the said Rules

Now, therefore, you Driver Constable Wall Ullah No.568 are called inton under section 4 (1) of the KPK Police Rules 1975, to show cause within 07 days of the issuance of this notice, as to why one or more penalties including major propiny of idismissal from service should not be imposed upon you.

Take notice that if you failed to submit reply in compliance of this show couse notice within the stipulated time, it will be presumed that you have noticing to offer in your defense and in that case, an expert action shall straighthing to taken against you without any further notice.

27 我认为阿诺派

પુત્ર નોંધ સ્વાયલ્ય બુદ્ધ નોંધાલ્ય દ્વે આ બહેર ટોલ્બ

District Police Officer.

Klakkl Marwat

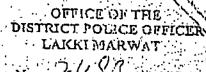
بر من جناب بحواله بشموله شوکاز نوش نمبری <u>6585/SRC بجارت</u> جناب دستر کن یو لیس آ فیسر صاحب صل کی مردت معروض جول کد افسران بالات محصب الزامات مندرجہ سوکار نوش کے بایات وضاحت طلب جوابا معروض مول .. کم بچط ٨، الميوب ب جوي من تعينات دمامون ادر بطور درائيور مركاري گاري ديوني المجام ومى كر تاريك انمى بيريد ك دوران مجمى بنى السران بالاكوت كاموقع نبيس ديا- مور الم 2021 / 3/ كويين صح 10:00 بج تا 11:50 بج تك موما كن كشيب ديونى مزاه أنور كمان THC ديون كى ب- ادر 12:00 بج سے وات تک ہمراہ ہاشم خان IHC بند کی سک ساتھ گشت پر تھا۔ اجن کے بابت ردائل / دا بنی کے نقل مدات المراه لف ب جو كى منى من ايام تعييناتى ك ددران من SI من ك ما تحسك السران لين IHC ف را تكرمانى كشت الديد في بر بن آنا بون در ای بات نوید نواز ASI کی جرم کو جمپائے اور جرم کر نے تک تعاقب کا اسر اذبارے سوج نبی نہیں سکتا اور بند میری اتل جیشیت ب- عالی جاه ایشول ریکار دیارت دیو ٹی بروز و توجه کو مد انظر رکھتے ہوئے ناکر دہ ج م کی رو يست ساكل كالتوكان إد لمنَّ بالا مزيد كارداني كاداً خل د فتر قُرْمَاني جادَب -عین نوازش ہو گی۔ . مور خه: 2021-14-المعارض ل معطل كَانتشين ولى الله 568 متعينه يو ليس لا تن كلى مردت.

بچارنہ **کی** D 11 الكأب لنج الموالري هذا ب حالات فقرمل كولا ب م قرى فقدم حذيف خاه ولدعالمين خاة فأتوبيت مس تقدمها فرا بخلاف لف برخوار as الجارج جوني كامر مردر الله عركل أمالا دلوخيل درجرجم خو مرفقت به الات فسقرول بس) م قرى فوج بنظا می بیال تی طوت والد اشی عالم بن شاہ کے قتل تر ک ريوت مريلاف ملزمان بالا مري م موروه، واكما ش) حالانالر حوصر الحد م جبال مي جو بر المحد كا انظار مر سي الم الدار ك بر مد من جاریانی بر بطاعاً - جند المد بردو ری چاریانی بر ق (مدى) اور هارون الريد بي الم الونت مرب 20:21 م بين تحوف دروارے سے كو دركو ارجوب ليولي وردى مى البق واغراجس كا . جاتی عركل آمنان دوخيل اندر بعجرا في - دونوى ماس طانت وف حالے تھے - او برلغ ازنے فور ا اپنے کا فکوف سے والدامش عالمین شاہ برنا الرك مشروع ف جس ف والك مرجار بالى بركير برا- مبد ممركل الح المرافيان المرتف المرتف المرتف المران الن بركلا فتلوف المكاهير رَها- لَعِبْد ارْمِتْوعَم مُتَنْسِ إِنَّ بَعَبْ سَ يَكُلُ مَتْ اور لِوج خان بِالْحَدَبِ وہ (مدی) کچرنہ سرکا۔ ۲۰۰ کے لعد جو پر شعہ ویددلاور خان ایسے او اس بعض فالمرف في المرار اور والكر وستعمال مرتب جوه راد ول كالرى م دائ مریخ میتان کو کے : جبکہ ماکد کم سنی زخوں کی ناب نہ لا سر ب سے میں جا بھی حو ۱ ۔ وجہ علامت ہے سے مدفقول نے فرس بن کادی بر وهوم سے بی دبر مبل مدر افراد سے خلاف خو بر الرول وا مرتب اور بكيك مول مرت كاليويث حيلا باعا جس بريقوعه هذا روامهوا-فتوعه حل ارشته داراش حارب الرخيد ماحيش ديو بترلابا - . ٥٠٥

22 قتلا قاالل روما بر تقرم على 1329 تورم 15 قرم المرادة 19 چانه کی دج جشر جو برند بنی شرع محوفی مقدمه هذا میں کرد ا فررچون بنى موعنان المراح 258 موجوالد چارج شيش 19-6369 قورخه ۱د/٥٠/٥٥ ، فيمسم الأربج/ دود موجواده جارج شيئ بمر ٢٠٢ - 6373 فورف الم/٥١/٢٥ ، رفيق ١٦/٢٢ حيارى تحسر لغ در لغ از PAS حوّ منقوم میں تذہراہے کو یہتے کی سے ان بہا کہ بیے ۔ انھوا سی زمرد تھا کی مارًى حور فرقيق والمسابق كاخاطر براييلو ومزراوب برانلوا بري دو جارى كرعف محوف روزنافيه حوك سى مرجب مرجد الموالم مرالم والم ۱د/٥١/٤٥ لفير مورز ERS كاكتف سے واليے المر بر حوف سے جدد ال ونسع روزالي الم المرادة لوقت ١٥ : ١٦ بع لوجه خرب عن سال مل . سبطی رو آی قسر پر شده بانی این جند محو ای روز مر ۱۵ روز ناف اید و بوقت مع: ١٩: ٢ جاوير حات عمانه كى حاب العريم المرك ردورف فمر برخونى بي - حسى بى مدى كاطرف ف تربر حوايد کم مقد مرفقل متذہ کر میں جو کی خاص کہا تکا سر کو برطو از ISA کی سمنارى على الذ حامة - تاج مذ جوره لنر كوردوز وندخانه مردیا میاسے ان مندراجات سے بارے فسر جوکی تخریخ الی الم 238 كابراى فحربهرى عياجا مرسوالات في الم مدر را الجرمي ولمتراكود ، بوازی مایچ کارشت اور بیشال رواکنی سے اندر اجات ۲ مانے لقلم خوریشے سی ای جی نے بوت مہا کہ اور افزار نے میں کو ( فرزیں ) المالمعلى الاردان العربين الزراجات فرر (طريخان) في بی - فر و فرز اس والات/ جوابات فر روافور برای مور بر یہ بان جو تد باربای خاص عامی سے ممان در از 200 بر ان میں میں الملاك بي ۔ اور وروعد سرزد دي سے حبيد ٢ س سے يو والل سرکاری ہو کا لغدی ہے ۔ جو کہ کھند میں والیسی ، بی سے جن می فَوْ وَرِي 187 ملك ملك من عنى المراح المراح المراح المراح المراح المراح المراح المراح المراح 

دلع خرل مج آی تا تردیندی سے انجارج عمد ابر ایس مال الد کابران الم آمر مارف خال FRP/ 137 ، طاحر خال جهج/ 1737 بروز وقوعه تورض در/ 10/ 63 كو دلفخول بجائف برنك مستحدى برموجود عماكم لو در دوار ٢٥٦٦ حكون سخا الجارج براميون مواركاروس كها جور الراميون خود مررياتها اور الدلا في بالله حو مرس مر ولوجل في طرف مرا جس مقب محارك قوائل کادی ۵/۵ وز جد ۲ ی - به علم نیس که مسر کاری توبانیل می اندی كون تول تحس لوير اوار ف يجب حيلاً بي - حبك والمرى بر كارى قوبانيل د لوطل بعاكل كاطرف شيرا آباد مذهوره الجارج سعمداه وتبدر لفنرى موجوده سيرى تواكمه كمن ما ويى بدان المصحوبه الخارج جرابارمی ہے دیا ہے ، روزنامی جیکی سی کی سردر طرنا ل حرمود و المروطف الم عصف الم عدين و روزاني الم ما يوت هو 16 المح جود تقطم تھا بود کی لائن کی مرود را آتن کا ہے . جسی حاصر یا دولیہ لان من مطلوب تھی، گندر بوتی لاٹن میں اپنی خاہم کا نیس کی سے اور مورخه اداه/66 كو بونت ٢٠١٦ مجم لائين تاخير فاردهدي بغظهم سرد با مواس جود الحال غيروا مسي حسى ت قور ام/٥٠٠٠ والعراد ، بزیشتل سیشی بچ نمبر او کو افوج محود ایس ADA سرافی سے جس سی ناریخ تورخه درامان فسر ب جاكة الم المحالفان المحالي وارج المجا المحالية الموابق بدان فحروری طور بر بیشی نیا ہے. جونہ زیرد تحطی کے ریڈر کے خوالہ سرا هواس - نام مردر سرالات/جوابات ک خاطر باوجور طلبی خانم شایا - هریری جوب لف اندو ایری هذا سے اسی طرح فجم التمر 187 سے بھی جند سوالات کی جو ہ تلز اف برلغاز تحم - عقب بزرجم بسركارى فوياش حافي قردير مرتاب سمه فصلغ در بنو از سے بیچھیے سے ساری مو با نل میں اس کا دیا ہے۔ بردر وتوجہ فحرائيل سركان بر الدراي وربى أند م 632 ى لايونى عى حس كابران در الله por hom

حَوْم بهان سے مد سريد وقوع تورخه اد/ ٥/١٠ كومسى فاقو باسل بر ديو في تھى تتمريف برلغاز سي بيس مي الميا يس جبد وفوعم و رفز مين أبد عرف حرف سى برمنشل عبد المبارى 245/7 ى 10 يستبدر 1400 بح مَن دْلُوقْ عَى جس كابى تحديرى بدان الباجا مرببان يس ملغ در لواز سے بيچے سركارى وانل امی نفری بن ای سے - برد سے برانا علم آندوا نمی طخدا برا : PAST المي المانات المالية المان المول بالقيقة مراحل من المرابع المانية المانية المرابع المرابع المرابع المرابع الم نے بطالمتی دور ناہی خسری بمت بیٹ الک میں سلحا دو آئی کی بیے متدرتش بنی انسر ک لفت فاور مقبق من موابق مذكور ، ببتال من المرى بنب فى بي اوريب ك ا المعالية المراج الف أكراس مزود وترم مر موزو فوعم جوى من بربات بزبان خاج وعار بھی کہ او کورہ 2053 ملزم سے مقتول کا مرسی قبل اہر بوسط برجن تسالمهد بدرايد برانبوط ودشكار وقع كاجانب وإنهطا بي حسی وجو حافظ محد و الفتری ال تراس می از خط مو شیشی تعلی می سے اور الدول ما بل بر الله بندى لفرى حاطابى لفريدلواز Ass بارلجه برالمروف قو ظر کار داد خول کی طرف کد بعد بعث جبد اس سے پیچے دوباً شل سرکاری میں لفرى يمى مين يس زمرد فحطى اس نتيج بريني ايت در فين ال محميهان عج/ + 187, جراء الرحين Fr 532 بزريعة فو باشل - ركارى لو در دو از RAS - يبع حا تیک بیس، جبکہ لاری وجہ سے یا سی دیکر معلمت کے قدت یا محلزمان تو فا تر ہ بنچا ہے ی خاطر خالات و و انعات کو بھُبا ہے کا کوشیش سرسی بیسی ، جبد ایک نے ای مقبقت کو چنجبانے میں شریخان ۲۹ فسرحيف. فانترج المراجع الموجد البارى 245/72 مى تامل المحمور المرجعة بی - السورون اللر الحد مران کے طابق مرور وقوعہ اس ک الربانيل -ركاب برويوفي فقى - تاجم يه بعى حقيقنا سي مروح مرمين اب لجو جوی قال زمان ہے براہ راست جناف طور بر رصہ بنیے کپا بینے۔ جبكم فسرر المحقطا بنى لؤيرلغال ومعموم فقلم خور بب اللاأتنى يبرك . جو برسعاليه ستان سے ، معاند ا مقبقت موجه الت ما بور اشما مور بالیے جا سران کے فلاف أربع برتحدانہ کا روائی کی سفارش کا کاف ا



Dater

/2021

FINAL SHOW CAUSE NOTICE

You Constable Wali Ullah No.568 while posted at PP City Lakki ure guilty of acts of omission and commission as detailed below:-

"On the event of full day you followed Naveed Nawaz to the crime scene and now you childing facts which show your connivance with the accused. Thus this speaks deviant and gross misconduct on your part.

2. Prior to this effect, you were issued Show Cause Notice to this effect. Your : reply to the show cause notice was perused and was found un-plausible.

3. NOW THEREFORE, I. <u>Shahzada Umar Abbas Babar PSP</u>, District Police Officer Lakki Marwat call upon you through this Final Show Cause Notice within three (03) days of the receipt of this Final Show Notice that as to why you should not be invinded a major punishment including dismissal from Service as provided under KPK Police Rules, 1975. Also state whether you want to be heard in person.

4. In case your reply is not received with in stipulated period without sufficient reasons, it shall be presumed that you have no defense to offer and the undersigned would be at liberty to pass oil ex-parte action against you.

(Shahzada Umar Abbas Babar) PSP District Police Officer Miakki Marwat جناب عالى المجوالة شولة شوكة نوش تمبرى 7493/ser مورعة 2021-11-11 مجارية جناب دستر كمث بوليس آ فيسر صاحب شل كل مردت معروض مول كدساكل كونبل ازين اس المدين شوكان تولس تمير ك6585/ser مورجة 2021-10-13 مجارية صاحب موصوف بالا ديا حميا فقار جس سك جواب ميس ساكل في مفصل فجواب اندر معياد الكوائري آ فيسر سك ساتھ بحق كميا سے -

F 16

اندر بن باره ایک مرتبه بجرسائل کوفائن شوکا زنونس تم مندرند بالا دیا حمیا۔ بنابقه جواب کے مطابق مورف ایک 202-10-3 کون 10:60 بجر سے 10-11 بجک مراه انور کمال IHC ، 12:00 ، 14C بجد رات تک مزاه پاشم خان IHC سے ساتھ میں بائل گشت پر دہا۔اندرین سلسلہ مسطابق دیکارڈ روز نامچہ چوکی کی پیش کردہ یقل مداب میرک بے گزاری کے لیے کھویں شوت ہیں۔ بچھ مردکا ہے گئے الزامات بے بلیا دہیں۔

نویدنواز طرم سابقہ PSI سے جرم کو چھپانے اور ایداد / سہز کست اسے بار مصورج محمن میں سکتا اور نہ ہی میر کے عہدہ کی انی حیتیت ہے۔

عا يجاد اسماك كوناكرده جرم يرجراسان بريشان كظ يغير ناشل شوكا زااعوا ترى ناتل كيا جان \_رحم كاحوا ستكارمول \_

نوازش انتحت پردری ہوگی۔ مورجہ 2021-11-12

ماك معطل كالشيبل دلي الله مبر 568 متعينه يوليس لائن كك-

NT to 12

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## OFFICE OF THE DISTRICT POLICE

## OFFICER LAKKI MARWAT

#### ORDER

My this order will dispose off the departmental enquiry proceedings against Constable Wall Ullah No. 568 while posted at PP City Lakki was found to indulge in the following omission as detail below:-

- That on even of full day he followed PASI Naveed Nawaz to the crime scene 1. and now you hiding facts which show his connivance with the accused. Thus this speaks deviant and gross misconduct on his part.
- he was issued Show Cause Notice to this effect. His reply to the Show Cause 2. Notice was perused and was found un-plausible. He was issued Final Show Cause Notice and the reply thereof was also found un-satisfactory.
- Therefore, I Shahzada Umar Abas Baber PSP, District Police Officer Lakki 3, Marwat exercise of the power vested to me under KPK Police Rules, 1975 hereby impose upon him major punishment of "Dismissal from Service" with immediate effect. He is directed to deposit all the Govt. articles allotted to him to the concerned branches.

OB No. 210 Dated 18/04/2022

Sd/-

(Shahzada Umar Abbas Babar) PSP District Police Officer, Lakki Marwat -

No. 7456-59 / Dated Lakki Marwat the

18/05/2022

Copy of above is submitted for favour of information to:-1. The Regional Police Officer, Bannu Region, Bannu. 2. EC. PO. OHC & Lines Officer for necessary action.

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OFFICE OF THE DISTRICT POLICE OFFICER LAKKI MARWAT PREASED FREE OFFICER U-mail: predstell/fitmell.com

ORDER My this order will dispose off the departmental enquiry proceedings against Constable Wali Ullah No.568 while posted at PF City Unklei was found to indulge in the following omission/commission is detail below:-

"That on the event of full day he followed PASt Nilveed Nilvaz to the crime scene and now you hiding facts which show his conflictance with the accused. Thus this speaks deviant and gross misconduct on his part.

2. He was ssued show cause notice to this effect His reply to the show cause notice was , perford and was found un-plausible. He was issued final show cause notice and the reply thereof was use tound un-satisfactory.

3. Therefore, 1 <u>Shuhzada: Umar Ahbas Babar PSP</u>; District Police Officer, Lakki Morwat exercise of the power vested in me under KPK Police Rules-1975, hereby impose upon him mejor pull shment of "Dismissil from service" with immediate effect. He is directed to deposit all the Govt: articles allotted to him to the concerned branches.

OB No. 210 Dated: 16 104/2022.

ł.

(Shahzada Umor Mbhils Balin District Pollee Officer aldd Marvel

No. 7 418 5/1 Doled Lakki Marwat Ile :

Copy of above is submitted for favour of information to: 1. The Regional Police Officer, Bannu Region, Bannu. 2. EC. PO, OHC & Lines Officer for necessary action.

## OFFICE OF THE DISTRICT POLICE OFFICER LAKKI MARWAT Ph# 0969-538240, Fax# 0969-538244

#### ORDER:

υ.

My this order will dispose off the departmental enquiry proceedings against Constable Faheem Ullah No. 215 while posted at PP City Lakki Marwat was found to indulge in the following omission/commission as detail below:-

- 1. "That he is facilitating PO/accused Naveed Nawaz. Thus this speaks deviant and gross misconduct on his part.
- 2. In this regard, he was charged sheeted and enquiry was marked to DSP/Hqrs: Lakki Marwat for through probe into the allegations. The enquiry officer after conducting proper departmental enquiry submitted finding report stated therein that he officia, concerned physically not'took part in the incident, however on the event of full day he went behind the accused PASI Naveed Nawaz in Govt. vehicle which speaks their secret intentions towards the incident and also hide the facts from the Enquiry Officer, hence found guilty of the misconduct. He was served with Final Show Cause Notice to this effect. His reply to the Final Show Cause Notice was perused which was also found un-satisfactory.
- Therefore, I Shehzada Umar Abbas Babar PSP, District Police Officer Lakki Marwat exercise of the power vested in me under KPK Police Rules-1975 hereby impose upon him minor punishment of "Stoppage of increment for two (2) years" with immediate effect.

O.B No. <u>209.</u> Dated: <u>18-05-2022.</u>

Sd/-

(SHEHZADA UMAR ABBAS BABAR) PSP District Police Officer Lakki Marwat.

No. 7460-63/dated lakki Marwat.

Copy of the above is submitted for favour of information to:-

1. The Regional Police Officer, Bannu region, Bannu.

2. EC, PO, OHC & Lines Officer for necessary action.

بخد عت جعناب ريجعل يولونين المسر صحب بيلوں ريجن بينوں متوان: - درخواست درباد - الحال بردت، متبوق مم 59 7456 مورد 2022-5-18 مارد

> جناب عالیٰ! گزادش بے کہ ماکل گڑادشات عرض کرنا جا ہتا ہوں کہ ک

من ماكل بحيثيت (را توركسنيل جوك فكال بين تعيدات موك ...

2- ، دور دقوع سال کا10: 06 بی منتخب منظراد الور کمان خان ۱۲۲ ، دیگر نفری بولیس مرکاری کا ژبی میں موبا ئیل کشت مفرر تنی - بوبوال مد 20 دور تا مجدد د ترد فر براین کشت مرکاری موبا ئیل کا ژبی کی فراین تک کرتے ہوئے داد ہوا۔

نويدنواز خان PASI صاحب فرميد دقوع ديمد خوددلو خل من مرزد ديا في جوكي شرا 215 كلومرك فاصل برب-جناب DPO فساحب في مروت في من ساكل كوتياري شيب الزامات المح PASI من مرد دي المحب في شرا محال مروت من من من من من

On the Event full day Followed FAST تستخط ما فادع ربی میت برایات ادر DSP/HQ کلی مروت کواکلوا سری افسر مقرر کیا 9- من سال فی خوارج شینه کامفصل جواب گزاری اورانکوا سرز نیام می کاکراس بیان قام بند کیا۔ 10- اکلوا سرک افسر صاحب فی مناکل سے طلاف نیون شواہد سے تحت الزامات تابت مذکر سکا۔اور کا سیس رپورٹ بخد مت جناب DPO صاحب کی

11- بہناب OPO حیا حب مے من سائل کو فائنل شوکا زنولس جاری فرایا ۔ سائل نے شوکا زنولس کامغصل جواب تحریری طور پرعرض کیا۔ 12- جناب DPO صالحب نے آرڈ ر DISMISSAL FROM SERVICE جاری فرمایا ۔ بوجودایس کہ سائل کے طلاف کوئی شہادت استشاب لیہ ہوا

۔ البذاسائل مود بابنگر ارش ہے کہ سائل کے ملازمت پر بنجالی اور بھم جتاب DPO حناجب کی مروت کے سنسونی اور کالعدم کرنے کے احکامات میا در فرماذین۔

ئىن بوازىن ہوگی۔

العارض مابقد دراتور معمل د لاالله 568 متعيير الح كاش لا حال برخاست شده) 23-05-2022 Riti

The Regional Police Officer, Bannu-Region; Bannu

The Addl: S.P. Bannu:

618/PA, dated Bannu the 20.106/2022

## ORDEREY ROOM - REINOURY IN CASE FIR NO.1329/2021 DATED 03.10.2021 U/S 302/34 PPC P.S LAKKI.

On 10th June 2022, during Orderly Room the police officially what have been awartled punished by DPO-Lakki appeared before the Regional Police Chief, Bannu, Their appeals and findings of enquiry conducted by DSP/HQ: Lakki were perused and recorded the following remarks:-

Addl: SP/Bannu."

្រីត;

Subject

Memo:

"Pla re-enquire into it and find the actual role of these officers in incident Muliammad Usman LHC No.238 Ralecq Head HC No.704

ii. iii.

Faheem Ullah FC No:215 iv. Willi Ullali FC No:568

Abdul Bari FC No:245 ٧.

.vi. Zia Ullah FC Nö.832

1 am further directed to enclose herewith a copy of finding of engines previously conducted by DSP/HQ. Lakki and a complaint moved by Syed Ibrar Hussain Shim on the subject for perusal, please:

Encl: As above (155 hats)

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Regional Police Office Bunnu: Region Bannu

Phone No: 0928-9270027 Fax No: 0928-9270045

OFFICE OF THE

ADDITIONAL SUPERINTENDENT OF POLICE,

	•	BANNU			
No.213/ASP	۰ 	· · ·	•	Dated 29/07	7/2022
•	•	• • • • • • • • • • • • • • • • • • • •		1	· ·
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To: 👘 🖯

#### The Regional Police Officer, Bannu Region, Bannu.

Subject:

#### ORDERLY ROOM-REINQUIRY IN CASE FIR NO.139/2021 DATED 03.10.2021 U/5 302/34 PPC PS LAKKI.

Memo:

Kindly refer to RPO Bannu letter No. 618/PA, dated 20.06.2022, on the subject noted above. Respected Sir,

As per your kind order, the undersigned re-enquired in case FIR No 1329/2021, dated 03.10.2021, registered u/s 302/34.PPC in PS Lakki. The detail of enquiry is furnished as under: -

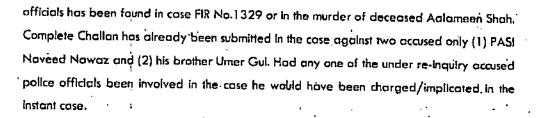
#### PROCEEDINGS:

The undersigned thoroughly studied all the documents pertaining to the subject case including the case file FIR No. 1329/2021 of PS Lakki, all the papers of previous enquiries charge-sheets, orders of departmental punishments etc. The PS Lakki and PP city (PS Lakki) record was also perused. All the six accused officials were summoned, heard in person and their statements were got recorded after putting some questions on them. Similarly, I.O of the case SI Munawar Khan was also summoned along with ease file. He was also heard in detail and his statement was also obtained. I also went through the contents of complaint moved by one Syed Ibrar Hussain Shah to Worthy RPO, Bannu. Copies of all the relevant documents have been placed on the enquiry life in hand.

#### CONCLUSION:

۱.

During the course of re-enquiry, oil the six accused police afficials have not been found guilty of the charges levelled against them. Neither any one of the accused was present on the spot/place of occurrence nor facilitated P:O/accused Naveed Nawaz. Likewise, neither any one of the accused has been charged for the offence by the complainant of FIR par concealed the facts from enquiry officers. The movement of police mobile, from PP City, soon after the departure of accused Naveed Nawaz from the PP, cannot incriminate the under re-enquiry accused police officials with the incident of case FIR No. 1329/2021, PS Lakki. Because the movement of police mabile was for routine petrol and not towards the place of occurrence. As per statement of the LO no involvement of the under re-enquiry police



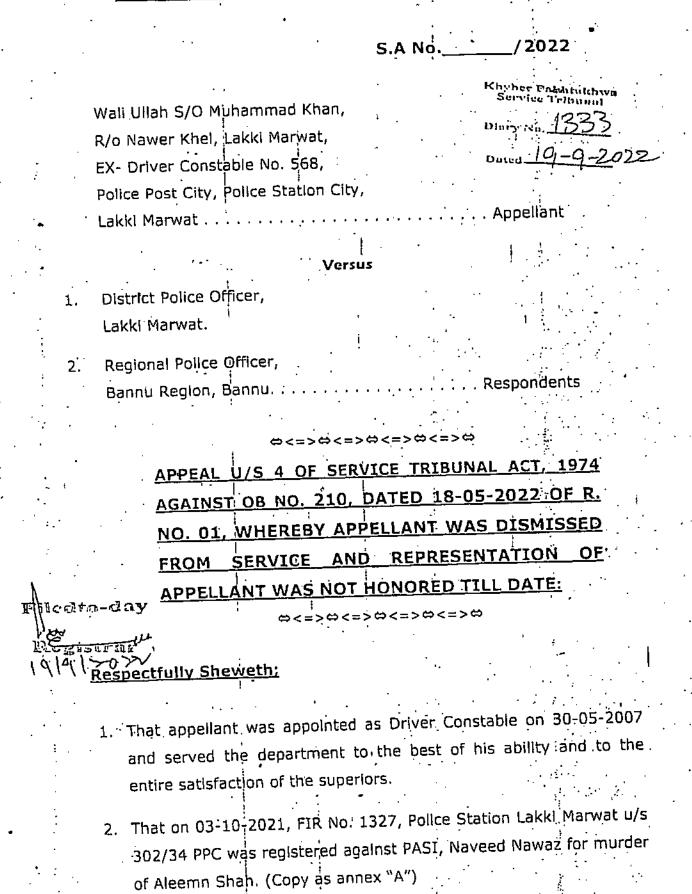
Hence, it is concluded that murder of Aolameen Shah is the personal issue of PASI Naveed Nawaz and his brother Umer Gul and not the issue of under re-enquiry police officials as none of them had any enmity or personal grudges with deceased party. RECOMMENDATIONS:

Keeping the above facts and figures in view, all the under re-enquiry 06 police officials are recommended to be exonerated from the charges leveled against them. Submitted please.

> Sd/-Additional Superintendent of Police, Βαπηύ

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## BEFORE KPK SERVICE TRIBUNAL PESHAWAR



3. That on 13-10-2021, appellant was served with Show Cause Notice on the allegation that:-

That on the event of full day you followed Naveed Nawaz to the crime scene and now you are hiding facts which shows your conhivance with the accused.

11.

This all speaks gross misconduct on his part and fiable to be punished under the Police Rules. (Copy as annex "B")

- 4. That on 14-10-2021, appellant replied to the Show Cause Notice and denied the allegations. (Copy as annex "C")
- 5. That enquiry into the matter was initiated against appellant but the same was not conducted as per the mandate of law because no statement of any witness(s) was recorded in presence of appellant nor he was afforded opportunity of cross examination what to speak of self defense. No punishment for imposition upon him was suggested what to speak of major punishment of dismissal from service, (Copy as annex "D")
- 6. That the authority was not satisfied with the aforesaid enquiry, so on 48-10-2021, subsequent enquiry was initiated not per the mandate of law and in this enquiry too, no punishment was ever suggested for imposition of appellant. (Copy as annex "E")
- 7. That on 11-11-2021, appellant was served with Final Show Cause Notice, without supply of enquiry proceeding to appellant which was also replied on 12-11-2021 and denied the allegations. (Copy as annex "F" & "G")
- 8. That on 18-05-2022, major punishment of dismissal from service was imposed upon appellant without taking into consideration the facts and circumstances of the case by R. No. 01. (Copy as annex "H")
- 9. That on 18-05-2022, Co-Employee, Fahlm Ullah having same role and conduct in the matter was exonerated from the charges, despite the fact that he was equally held responsible in the matter was given minor punishment of stoppage of increment. (Copy as annex "I")

- 10. That on 23-05-2022, appellant submitted representation before R. No. 02 for reinstatement in service with all back benefits which met dead response till date. (Copy as annex "J")
- 11. That on the departmental appeal, R. No. 02 passed order for reenquiry in the criminal case with remarks:-
  - "Please re-enquire into it and find the actual role of the officers in incident vide letter dated 20-06-2022". (Copy as annex "K")

Hence this appeal, Inter Alia, on the following grounds;

#### <u>G R O U N D S</u>

- a. That from the FIR dated 03-10-2022, it is very much clear that Naveed Nawaz apprehended one Almeen Shah with pistol and arrested him at the spot. One Johar Muhammad son of Dilawar Shah posing himself to be the leader of PTI of the locality, made
   hot words with the said PASI for arresting the said culprits.
- b. That the said deceased whirled message on Facebook ID against the said PASI that he is harassing handsome people. The said PASI went to village Daio Khel and killed the said Almeen Shah at the same time, appellant was at police post, Lakki Marwat.
- c. That appellant never facilitated the said PASI in the commission of offence and it was his own act, if any.
- d. That charges leveled against appellant has no nexus with the same as he never facilitated the said matter.
- e. That the matter was not dealt with as per the mandate of law because neither any statement of any witness(s) was recorded in presence of appellant nor he was afforded opportunity of crossexamination.
- f. That appellant was unaware as to whether the said PASI is going for checking to Hospital or for going to other purpose.

- g. That double enquiries were conducted in the matter but no punishment was ever suggested by the Inquiry Officer to impose the same upon appellant, what to speak of major punishment of dismissal from service.
- h. That the authorities never dealt with the matter as per the record and circumstances and for no obvious reason, appellant was implicated in the same.
- That in similar circumstances, constable Fahim Ullah was exonerated from the charges by R: No 01 at the recommendation of Political vendetta and appellant was awarded with major punishment of dismissal from service.
- j. That neither original nor appellate order was per the mandate of law, so are liable to set aside. The same are based on malafide and discrimination.

Dated: 19-09-2022

It is, therefore, most humbly prayed that on acceptance of the appeal, order dated 18-05-2022 of the R. No. 01 be set aside and appellant be reinstated in service with all consequential. benefits.

Appellantį

Through Saadullah Khan Marwat

Arbab Salful Kamal

Amjad Nawaz Advocates:

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for which was perused. On 16.06.2022 the appellants were heard in orderly room another pape were marked to Addl: SP Bannu vide this office Memo: No.618/PA doiede20/06/20225 with the direction "plz re-enquire into it and find the actual role of these officers in incid Enquiry Officer (E.O) conducted proper departmental enquiry and came to the concluded that all the six accused police officials have not been found guilty of the charges leveled against them, He submitted his findings vide Memo: No.213/ASP duted 29/07/2022 quoted therein that neither any one of the accuseds was present on the spol/place of occurrence nor facilitated PiO/accused Naveed Nawaz. Likewise, neither any of the accuseds has been charged for the offence by the complainant of FIR nor concealed the facts from enquiry officers. The movement of police mobile from PP City Lakki, soon after the departure of accused Naveed Navaz from the PP; cannot incriminate the under re-enquiry accused police officials with the incident of case FIR. No.1329/2021, PS Lakki, Because the movement of police mobile was for routine petrol and not towards the place of occurrence. As per statement of the LO no involvement offithe under reenquiry police officials has been found in case FIR No.1329 or in the murder of deceased Aalmeen Shah. Complete Challan has already been submitted in the case against two accused viz (1) PASI Naveed Nawaz and (2) his brother Umer Gul. Had any one of the under rejenquiry accused police officials been involved in the case he would have been charged/implicated in the instant case.

Therefore, I, Syed Ashfaq Anwar, Regional Police.Officer, Bannu RegionsBannuin exercise of the powers vested in me under Khyber PakhtunkhwaiPolice Rules, 1975 (amended in 2014) hereby set aside the orders of DPO Lakki Marwat quoted above. The appeals of mentioned officials in the cited joint enquiry are hereby accepted and they are reinstated into service with immediate effect. Moreover, their periods of dismissal? out of duty in the instant ease are treated as leave without pay.

ORDER ANNOLINCED OB No. 384 Dated: 30/12/2022.

In. 50.32 /EC, dated Bannu the 30 / 12/2022

Regional Police Officer Bannu Region Bannu

DPO-Lakki Marwat for information and necessary action w/r to his officer letters No. quoted above along with complete enquiry files and Service Rolls of above named officials for record in your office which may be acknowledged, please.

A.No. 1431/2022 29 Walinlah is Gott

12.01.2023

Mr. Arbab Saiful Kamal, Advocate for the appellant pi Mr. Asif Masood Ali Shah, Deputy District Attorney for the réspondents present.

02. Learned counsel for the appellant submitted office order OB No. 384 dated 30.12.2022 whereby the appellant has been reinstated into service with immediate effect and the period of dismissal from service treated as leave without pay. In this respect he also submitted an application for withdrawal of the instant service appeal with the permission to file a fresh. Application is allowed subject to all just and legal objections. Consign.

03. Pronounced in open court at Peshawar and given under my hand and seal of the Tribunal this 12th January, 2023.

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Certified to

Khybar - U

(Mian Muhammad) Member (E) LULE COLL

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Service Tribunal Peshquiar Úrread ----Date Wate of Delive

ليتاريخ بسط مستعرف كما المرينة لأرك حصورة مستعمر والمناقدار - Jul Sor All the time to the second of the مت بدمند وعران بالامين ابنى لمرتب واسط بيرين وجواب دين ذكل كاردا كما متعلقة لأنفا كتبادر مسيط استحد أيأس خان سويت الثور با في كور مح وكي مقتر كرام إفرار كما جا، بتر كرما م تموضح بمقصب كمك كارواتي كاكابل اينة بإرتبجتما يسيروكم عاصب وركوك الفن والفن المدوتير والمشروقيها وسطف يست جوار وشى اورا قبال دعوى اورليم توز ذكركي كمسنا براء أور وصولى جمك وروبيه أوريرطى دعوى اور درخواسيت مرتبه من تقدرين ا دند ن براية تخط كمان كا اختيار توبيًا ينبر بصورة عدم بسروي يا دركمي بكيطير يا ايل ك برايد كل اور سنت من البر قاد مربية 15 في عمران وتستريان و مبريري مربية كالفاتيات بريسا الدر بصورت خرفيرية مقدمة يكور يك أ بروى ما والى عليه واسط اور ومن المنار قالون كوساية بمراح با ابنى بما في تعزيه فا المايار بدار ا ورصاحه بمقرر شده محرصی و بی جمار مذکور بالا اختباطت حاص بول مسم ا وراس کا ساخته برد اخته سنادر قبول مبكركما ويوران مقدمهم بساحو يغرجبه وتبرجانه النوا ومقديس منسب سيستوكا استحستمن وتمل صاحب مَوْتُوفَ بِدِنْ مَسْ مَيْزِبِقَايَا وِحْرَبَهِ كَ وَصَوْلَ كُرْفَ فَكَالِقِي اَحْتَيَا وَجُرَا ٱلْكُركُولَى مَتَاجًا مَ رَبَرَه مر به با مدس المر بحوالة وكمل صاحب با مند ته محد ل مح كم مبروى مدكور كري. لہٰذا وکالت نامہ دکھھ دیا کہ سند سے ۔ 25-01-23. standf. لم الم اربات في المما 2 Alchen wali 10 - Contractor المجد لواز