BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR AT CAMP COURT SWAT.

Service Appeal No. 83/2019

Date of Institution ... 26.12.2018

Date of Decision ... 05.11.2021

Nasibur Rehman (Ex-FC/No. 115) R/O Village Mekhban, Malakand.

(Appellant)

(Respondents)

For appellant.

For respondents.

<u>VERSUS</u>

District Police Officer, Bunir and two others.

MR. SHAMS-UL-HADI, Advocate

MR. RIAZ AHMED PAINDAKHEL, Assistant Advocate General

MR. SALAH-UD-DIN MR. ATIQ-UR-REHMAN WAZIR MEMBER (JUDICIAL) MEMBER (EXECUTIVE)

<u>JUDGMENT:</u>

SALAH-UD-DIN, MEMBER:-

Precise facts forming the background of the instant service appeal are that the appellant while posted as TFC in Traffic Police was proceeded against departmentally on the allegations that he collected money from other traffic officials by deceiving them on the pretext that huge amount was spent on launching of Traffic Warden System. On conclusion of the inquiry, the appellant was awarded major penalty of dismissal from service vide order dated 24.10.2018 and it was also directed that the amount of Rs. 70000/may be deducted from his salary and the same be paid to the Traffic Officials from whom the appellant had collected the money. The appellant being aggrieved of the penalty awarded to him, challenged the same through filing of departmental appeal, which was also rejected vide order dated 11.12.2018, hence the instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellant in his appeal.

3. Learned counsel for the appellant has contended that the amount was collected by the appellant upon the directions of Incharge Traffic and the same was handed over to him; that the appellant was falsely entangled in the inquiry with ulterior motive by making him scapegoat and no action was taken against the Incharge Traffic, who actually directed the appellant for collecting money from other Traffic Officials; that the inquiry proceedings were not conducted in accordance with the relevant rules as no opportunity of personal hearing and cross-examination was provided to the appellant. In the last he requested that the impugned order being wrong and illegal may be set-aside and the appellant may be reinstated in service with all back benefits.

4. On the other hand, learned Assistant Advocate General for the respondents has contended that the appellant had deceived other Traffic Officials and had received money from them on the pretext that the Incharge Traffic had asked him for collection of money from them; that the appellant has himself admitted collecting of money from other Traffic Officials and though he has alleged that the same was handed over by him to Incharge Traffic, however no evidence in this respect was produced by him during the inquiry; that the appellant was found guilty of the allegations leveled against him, therefore, he has rightly been dismissed from service.

5. We have heard the arguments of learned counsel for the appellant as well as learned Assistant Advocate General for the respondents and have perused the record.

6. A perusal of the record would show that disciplinary action was taken against the appellant on the allegations that he while posted as TFC in Traffic Police had collected money from other Traffic Officials on the pretext that huge amount was spent on launching of Traffic Warden System. The appellant was issued

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charge sheet as well as statement of allegations and regular inquiry was conducted in the matter. On conclusion of inquiry, final showcause notice was issued to the appellant, who submitted reply to the same and he was also called to orderly room for personal hearing on 17.10.2018. During the inquiry, statements of the Traffic Officials from whom the appellant had collected money, were recorded and the appellant was also given opportunity to crossexamine them. The appellant has not denied collecting of amount from other Traffic Officials, however it is his stance that the amount was collected on the directions of Incharge Traffic namely Muhammad Ali ASI and the same was handed over to him. Statement of the said ASI was also recorded during the inquiry, who has categorically denied the stance so taken by the appellant. The appellant could not produce any cogent oral or documentary evidence, which could show that the appellant had handed over the collected money to the aforementioned ASI. On thorough perusal of the record, we have came to the conclusion that the allegations against the appellant stood proved, however keeping in view the facts and circumstances of the case, the penalty awarded to the appellant is too harsh.

7. In light of the above discussion, the appeal in hand is partially allowed and the impugned orders are modified to the extent that major penalty of dismissal from service is converted into minor penalty of stoppage of three annual increments for a period of three years with cumulative effect. The appellant stands reinstated into service from the date of his dismissal, however the intervening period shall be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 05.11.2021

(ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE) CAMP COURT SWAT

(SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT SWAT Service Appeal No. 83/2019

05.11.2021

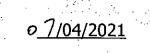
Appellant alongwith his counsel Mr. Shams-ul-Hadi, Advocate, present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is partially allowed and the impugned orders are modified to the extent that major penalty of dismissal from service is converted into minor penalty of stoppage of three annual increments for a period of three years with cumulative effect. The appellant stands reinstated into service from the date of his dismissal, however the intervening period shall be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 05.11.2021

-Rehman Wazir) Member (E) Camp Court Swat

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



9-6-2021

Due to COVID-19, the case is adjourned to

<u>09]06</u>/2021 for the same.

READER

21 Oue to COVID-19, The case is appaulated to 5-11, 2021 for farme.

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3.01.2021

Due to COVID 19, the case is adjourned to 2 .03.2021 for the same as before.

- VERTER

Read

02.03.2021

Appellant in person present.

الاسلام ومرافقته والأثر والما

Noor Zaman Khan Khattak learned District Attorney for respondents present.

Lawyers community is on strike, therefore, case is adjourned to 7/4/2021 for arguments before D.B at Camp Court, Swat

(Mian Muhammad) Member (E) Camp Court, Swat

(Rozina Rehman) Member (J)

Camp Court, Swat

.2020 Due to COVID19, the case is adjourned to $v \sum \frac{\hbar}{2020}$ for the same as before.

05.10.2020

Learned counsel for the appellant is present. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Nowsherwan, Inspector (Legal) are also present. Learned counsel for appellant is seeking adjournment that he has not prepared the brief of the instant appeal. Adjourned to 03.11.2020 on which to come up for arguments before D.B at Camp Court, Swat.

(Mian Muhammad) Member (Executive) Camp Court Swat

(Muhammad Jamal Khan) Member (Judicial) Camp Court Swat

03.11.2020

Attorney of appellant on behalf of appellant present.

Muhammad Jan learned Deputy Attorney alongwith Shujaat Ali H.C for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 05.01.2021 for arguments, before D.B at Camp Court, Swat.

(Atiq ur Rehman Wazir)

Member (E) Camp Court, Swat

(Rozina Rehman) Member (J) Camp Court, Swat 02.06.2020

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

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Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Nowsherwan Inspector (Legal) for the respondents present. Appellant submitted application for adjournment on the ground that his counsel has gone to Hon'ble Peshawar High Court, Peshawar and cannot attend the Tribunal today. Application is placed on record. Case to come up for rejoinder if any and arguments on 08.01.2020 before D.B at Camp

Court Swat. (Hussain Shah) Member

Camp Court Swat

(M. Amin Khan Kundi) Member Camp Court Swat

amp Court

08.01.2020

Appellant in person and Mr. Biaz Ahmad Paindakheil, Assistant AG for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 02.03.2020 for rejoinder, if any, and arguments before D.B at Camp Court Swat.

(Hus ih Shah) Member Camp Court Swat

02.03.2020

Appellant in person present. Mr. Usman Ghani learned District Attorney alongwith Khalid Khan ASI for the respondents present. Appellant requested for adjournment on the ground that his cousnel is not available today. Adjourn. To come up for arguments on 07.04.2020 before D.B. at Camp Court Swat.

Member

Member Camp Court Swat

Due to corrona virous to bon careelled. To come up ie Same on - 2/6

06.05.2019

Learned counsel for the appellant present. Written reply not submitted. Noshwerawan SI present and seeks adjournment to furnish written reply/comments. Granted. To come up for written reply/comments on 01.07.2019 before S.B at Camp Court, Swat.

Member Camp Court, Swat.

01.07.2019

Appellant in person present. Written reply not submitted. Nowsherawan SI representative of the respondent department present submitted reply/comments. Adjourn. To come up for rejoinder, if any and arguments on 07.10.2019 D.B at Camp Court, Swat.

Member Camp Court, Swat.

07.10.2019

Appellant in person and Mr. Anwar-ul-Haq, Deputy District Attorney alongwith Mr. Nowsherwan, S.I (Legal) for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned to 04.11.2019 for rejoinder, if any and arguments before D.B at

Camp Court Swat.

(Hussain Shah) Member Camp Court Swat

(Muhammad Amin Khan Kundi) Member Camp Court Swat

07.02.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Ex-FC) has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 24.10.2018 whereby he was awarded punishment of dismissal from service with further direction of deduction of Rs. 17000/- from his salary and distribution amongst the T.Os from where the appellant had extorted. The appellant has also challenged the order dated 11.12.2018 through which his departmental appeal was rejected/filed.

Points raised need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter notice be issued to the respondents for written reply/comments. To come up for written reply/comments on 01.04.2019 before S.B at Camp Court Swat.

fèmher Camp Court Swat.

01.04.2019

Appellant in person present. Written reply not submitted. Nowsherawan SI legal representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 06.05.2019 before S.B at Camp Court Swat.

Member Camp Court, Swat.

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Form- A

FORM OF ORDER SHEET

	Case No	83/2019		
S.No.	Date of order	Order or other proceedings with signature of judge		
	proceedings			
1	2	3		
1- 18/1/2019		The appeal of Mr. Nasib-ur-Rehman resubmitted today by Mr		
		Shamsul Hadi Advocate, may be entered in the Institution Register an		
÷		put up to the Worthy Chairman for proper order please.		
		REGISTRAR 18111		
2-	28-1-19	This case is entrusted to touring S. Bench at Swat for preliminar		
	1	hearing to be put up there on 07-02-2019		
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		CHAIRMAN		
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The appeal of Mr. Nasib-ur-Rehman Ex-FC No. 115 r/o village Mekhban Malakand received today i.e. on 26.12.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Memorandum of appeal may be got signed by the appellant.

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- 2- Copy of order dated 11.12.2018 is illegible which may be replaced by legible/better one.
- 3- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.

No. 2460 /S.T.

Dt. 27 -12 -/2018.

-27/12/18 REGISTRAR

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Shamsul Hadi Adv. Swat

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. <u>33</u>/2010

Nasibur Rehman.....

VERSUS

I.G Police Khyber Pakhtunkhwa and others......Respondents

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Appellant

Through

.....Appellant

Dated:

Shams-ul-Hadi

Advocate, Peshawar. Office: 2nd Floor,Bangush Plaza Khyber Super Market, Peshawar Cantt. Cell No. 0313-9772262

BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 83/2019.

Khyber Pakhtukhwa Service Tribunal Diary No. 1895 Datest 26/12/20/8

Nasibur Rehman (Ex-FC/No.115)

R/o Vilage Mekhban , Malakand......Appellant

VERSUS

1. District Police Officer, Bunir.

2. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

3. Deputy Inspector General of Police, Malakand Region,

Saidu Sharif Swat.....Respondents

APPEAL UNDER SECTION 4 OF KHYBER PUKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE IMPUGNED OFFICE ORDERS DATED:24.10.2018 AND 11.12.2018.

PRAYER IN APPEAL:

On acceptance of this appeal the impugned Orders dated:24.10.2018 and 11.12.2018 of Dismissal from service of the appellant may kindly be set aside and the appellant may kindly be re-instated with all back benefits of service.

Re-submitted to -day and filed.

edto-day 12112

Respectfully Sheweth:

FR. LARING M.

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- 1. That initially the appellant joined the respondent/department since long and as such performed his duties with zeal and zest.
- 2. That latter on during his service, on directions of his in-charge Traffic, the appellant collected some amount from police officials /TOs in connection of traffic rules awareness public program and as such the said amount was handed over to In-charge traffic Bunir police but latter on, on the basis of a compliant, a so called inquiry was conducted and through impugned office order dated:24.10.2018 the appellant was removed from service that too without observing legal formalities..(Copy of impugned office order dated:24.10.2018 is annexure-A)
- 3. That against the impugned order dated:24.10.2018, the appellant filed departmental appeal before the Resp No.3 but same was also rejected vide impugned order dated:11/12/2018.(Copy of departmental appeal and impugned order dated:11.12.2018 are annexure- B)

That being aggrieved from the impugned orders, the appellant approached this Hon'ble Tribunal on the following grounds amongst other inter alia:

GROUNDS:

 A. That the impugned office orders are against facts, law and procedure, hence, untenable being unjust and unfair.

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- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for the purpose.
- C. That the whole departmental proceedings against the appellant was based on personal ill well and with ill intention a harsh and illegal penalty was imposed on the appellant.
- D. That no opportunity in shape of personal hearing was afforded to the appellant during enquiry proceedings and as such no statements of relevant person related to the issue were recorded and without any evidence the appellant was dismissed from service which clearly showing the ill intention of the appellant.
- E. That any other ground may be adduced during the course of argument, with the kind permission of this Hon'ble Court.

It is, therefore, most humbly prayed that On acceptance of this appeal the impugned Orders dated:24.10.2018 and 11.12.2018 of Dismissal from service of the appellant may kindly be set aside and the appellant may kindly be re-instated with all back benefits of service.

Through

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Dated: 17/12/2018

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Shams ul Hadi Advocate, Peshawar.

Appellant

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. ____/2018

Nasibur Rehman.....Appellant

VERSUS

I.G police Khyber Paktunkhwa and others......Respondents

AFFIDAVIT

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information convoyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

AAHMOO ADVOCATE KHA ^{KA}R HIGY

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. ____/2018.

Nasibur Rehman.....Appellant

VERSUS

I.G police Khyber Paktunkhwa and others......Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Nasibur Rehman (Ex-FC/No.115)

R/o Vilage Mekhban , Malakand

RESPONDENTS:

- 1. District Police Officer, Bunir.
- 2. Provincial Rolice Officer, Khyber Pakhtunkhwa, Peshawar.
- 3. Deputy Inspector General of Police, Malakand Region, Saidu Sharif Swat.

Appellant Through ł

Dated: 17/12/2018

Shams ul Hadi Advocate, Peshawar.

ORDER

This order will dispose of departmental enquiry initiated against <u>FC Nasibur Rahman No.115</u> of this district police vide this office No. 57/Enquiry, dated 02/10/2018.

Brief Facts:

Fc Nasibur Rahman No.115 of this district police while posted at PP Torwarsak PS Daggar district Buner, while his posting in Traffic Police as a TFC he had collected amount from constable by pretending that huge sum of amount is served on opening on Traffic Warden System, therefore, it is necessary to collect a combined fund. He has deceived the officials and collected money from them. He was proceed departmentally and served with charge sheet and statement of allegations under Police Disciplinary Rules-Mr. Muhammad Naeem Khan SDPO Totalai was appointed 1975. as enquiry officer. The Enquiry Officer has recommended the official concerned for punishment. Subsequently, he was called to OR on 15/10/2018 for personal hearing but he could not produce any solid reason for the satisfaction of the undersigned. Resultantly, final show cause notice was serviced upon the concerned defaulter vide, Enquiry No.5926/Enq, dated 17/10/2018. The reply to the final show cause notice was not satisfactory so the undersigned heard him in person, but he could not produced any substantial documents in his defense.

Therefore, <u>I Sadiq Baloch District Police Officer Buner</u> as Competent Authority and in exercise of the power vested in me under Police Disciplinary Rules-1975, award major punishment of dismissal to constable Nasibur Rahman No. 115 and deduct 17000 from his salary and distribute amongst the TOs from where he had extorted.

Order announced.

DISTRICT-POLICE OFFICER, BUNER

Hans

OB No. <u>156</u> Dated: 24 / 10 / 2018 No. 6281

/Eng, dated Daggar the

Copy to all concerned.

/2018.

(APPELLATE JURISDICTION)

To,

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The Regional Police Officer, Malakand Region at Saidu Sharif Swat.

Subject: - DEPARTMENTAL APPEAL AGAINST THE ORDER OF DISTRICT POLICE OFFICER, BUNER ISSUED VIDE OB NO. 156 DATED 24.10.2018 WHEREBY THE APPELLANT WAS ILLEGALLY DISMISSED FROM SERVICE.

Respectfully Sheweth,

- That I was enlisted as constable on 21.05.1998 in the strength of Buner district police. I was attached with the strength of Police Lines Buner and was deployed at DPO's Guard, DC's Guard, PP Kingargalai, PS Jowar, PP Ambela, CP Karhakar, PP Sowarhi, PS Totalai, PP Sra Thana and Traffic Police Buner.
- 2. That I have performed my duty with devotion and dedication to the entire satisfaction of my superiors.
- That during my traffic duty I have been granted commendation
 Certificates with cash rewards.

That on 11.08.2018 Buner Traffic Warden system was started in the district. On 12.08.2018 I fetched uniform from clothing godown and distributed among the strength.

- That on 13.08.2018 at 15:00 hrs, while I was on duty at Sultan plaza Sowarhi, the traffic Incharge ASI Muhammad Ali called me on my Cell phone and informed that he was sending T.O. Nisar who would tell me his message. After 15 minutes T.O. Nisar No. 440 of Traffic staff Buner arrived at the room of T.O Amrosh Khan No. 1027 at Sultan Plaza Sowarhi where T.O. Shahid Zada No. 07 was also present, and told me that our Incharge ASI Muhammad Ali had started Traffic Warden System awareness campaign, had spent Rs. 44000/- from his own pocket and our colleagues need to donate some amount to him to over come the expenses. I then consulted 34 colleagues of Traffic staff and collected an amount of Rs. 17000/- from them.
 - That on 15.08.2018 I handed over the collected money Rs.17000/- to the Incharge ASI Muhammad Ali at PP Sowarhi in presence of driver FC Ismail and Gun man FC Irfan of Traffic staff Buner.

- present in the office. I narrated full story before the worthy DPO Buner who at the same time asked ASI Traffic that he had given Rs.1,40,000/- for the campaign. If the amount was spent, why did he not ask him for more money instead of collection of donation from subordinates? He illustrated that he had spent the amount on banners and vehicles. But nothing said about the donation. He asked the DSP Hqrs to lodge FIR against ASI Muhammad Ali but DSP Hqrs. stated that he would initiate an enquiry to dig out the facts and I was relieved from the office.
- 8. That on 02.10.2018 a Charge Sheet and Statement of
 Allegation was issued to me vide No. 57 dated 02.10.2018. I
 submitted my reply in due course of time.
- 9. That a rapid inquiry was started by DSP Totalai on 04.10.2018. Except recording my statement I was not given opportunity of association with the inquiry or personal hearing. I have also not been given opportunity of Cross examination.
- That I applied for copies of inquiry papers on 25.10.2018 in the office of worthy DPO Buner but I was given only dismissal order issued vide OB No. 156 dated 24.10.2018.
- That if my any malafide intention was included in collection of donation or had I collected money from any public figure, the Incharge might have recorded a report against me in the DD.
- 12. That constable Ajbar Ali is brother of ASI Ali Bahadar of Buner Police. He gave me Rs. 500/- after three days after consultation with his brother. May be ha had some grudges with ASI Muhammad Ali and instigated Ajbar Ali to complain against me as I was a middle man in the episode. Incharge traffic is an influential person who made me escape goat and saved his skin. This was he who warned that any one who does hesitate to give donation will sort be out. I was a poor constable. How could I depress some one else? How could I dare collection of donation with out the orders of Incharge Traffic Buner?
- 13. That the penalty awarded to me is harsh and so request to be set aside on humanitarian grounds.

<u>Grounds:-</u>

- (a). That the impugned order is illegal and in violation of law / rules.
- (b). That the order of dismissal is void abinitio; therefore the appellant
- ctr

That a final show cause notice was served upon the appellant but was not heard in person.

(e) That the opportunity of cross examination was not provided to the appellant.

 (f) That the Appellant was not associated with the enquiry proceedings and the principle of Natural Justice "Audi Alterm Partum" has been violated.

(g). That as per judgments of the superior courts, the competent authority is bound to hold proper departmental inquiry before awarding any kind of departmental punishment, failing which the penalty awarded assumes the status of void abinitio and illegal but in my case the orders of the superior courts have not been kept in view before awarding the present major punishment.

Prayer:-

(d)

Keeping in view the above facts and grounds, your good self is requested kindly to set aside the impugned order of District Police Officer, Buner issued vide OB No. 156 dated 24.10.2018, whereby the Appellant was dismissed from service, and reinstatement of the appellant with all back / consequential benefits, please. The appellant also requests to be heard in person.

Enclosed = (Order of Compulsory retirement from service + Copies of my replies to initial show cause notice and charge sheet).

Obediently the, APPELLANT 10

Naseebur Rahman s/o Sahib Jamal r/o Maikhban, Malakand district (EX- CONSTABLE NO. 115 OF BUNER DISTRICT.) Dated 30 October 2018.



OFFICE OF THE REGIONAL POLICE OFFICER, MAI AT SAIDU SHARIF SWAT. <u>Ph: 0946-9240381-83 & Fax No. 0946-9240390</u> <u>Email: digmalakand(ä vahoo.com</u>

ORDER:

This order will dispose off appeal of Ex-Constable Naseeb Ur Rahman No. H5 of Buten Discrict for re-instatement in service.

Stief facts of the case are that the above named-Ex-Constable, was enlisted on 21/05 1998 and having 20 years, 06 months and 19 days of service. There are 12 good entries and 05 bad entries in his service repord. The appellant was dismissed from service due to allegations that at the time of his posting as DFC he has collected money from Constables by protending that huge sum of money is surfed on opening of Traffic Wardon System, so it is necessary to collect a combined fund. He has deceived the officials and collected money from them. Consequently he was proceeded departmentally and served with charge sheet and statement of allegations under Police Discoplinary Rules-1975 and Muhammad Naeem Khan SDPO Totalai was appointed as enquiry officer, the enquiry officer recommended the defaulter concerned for punishment. Subsequently he was called in Orderly Room on 15/10/2018 by the then DPO Bluner for personal hearing but he could not produce any cogent reason for the satisfaction of the then Dismot Police Office, Buner. Resultantly a final show cause notice was served upon the delinques. Constable and he was provided another opportunity of personal hearing but he could not produce substantiat documents in his defense. In light of above the District Police Officer, Buffer awarded him major punishment of dismissal from Service along with deduction of Rs: 17000 from his salary for distribution amongst the TOs from where had extorted vide his office OB No. 156 dated 24-10/2018.

the was called in Orderly Room on 14/11/2018 and heard him in person. The appellant pleaded that he has collected money on the directions of Traffic incharge. Therefore, a denovo enquiry was ordered into the matter and Addl: SP Swar was appointed as Enquiry Officer. The Enquiry Officer recorded statement of the delinquent Ex-Constable Nasceb Ür Rahman No. 115 wherein he stated that he are collected Rist 500/500 per head from 34 Truffic performed for the purpose of signboards etc. and paid Ref 17000/- to ASI Muhammad All. Inclusing Praffic District Buner in presence of Constable leman No. 512/3PF and Irign Ullah No. 522 of TraMe Staff Buner. Statement of both the Constables were recorded wherein they stated their unawareness about payment of money to ASI Muhammad Ah. Incharge Traffic Buner. Hence the Enquiry Officer held him guilty for the Charges levelled against him Therefuge his appeal for reinstatement in service is hereby filed

Order announced.

(AVARISAEED) PSP Regional Police Officer, vichtkond, gt Saklu Sharif Swat

No. 1914 .E. Dated 1/ -1 2 /2018.

Copy to District Palice Officer, Buner with the direction/conduct denova enquiry against ASI Muhammad-Ali, Incharge Traffic Buner into the maner and submit his report within a week time positively. This is with reference to Youroffice Memo: No. 6587/Enquiry, dated 05/11/2018. Service Roll, Froji Mitsal and complete enquiry file of Ex-Constable Naseeb Ur Rahman No. 115 are reformed herewith for record in sign office.

102 enquiry & Submit

Enguisy Clask

OFFICE OF THE **BETTER COPY OF PAGE NO: 11 REGIONAL POLICE OFFICER, MALAKAND** AT SAIDU SHARIF SWAT. PH: 0946-9240381-83 & Fax No. 0946-9240390 Email: digmalakand@yahoo.com

ORDER

This order will dispose off appeal of Ex-Constable Naseeb Ur Rahman No. 115 of Buner district for re-instatement in service.

Brief facts of the case are that the above named Ex-constable was enlisted on 21/05 1998 and having years, 06 months and 19 days of services. There are 12 good entries and 05 bad entries in his service record. The appellant was dismissed from service due to allegations that at the time of his posting his DFC he has collected money from constables by pretending that huge sum of money is surfed on opening of Traffic warden System, so it is necessary to collect a combined fund. He has deceived the official and collected money from them. Consequently he was proceeded departmentally and served with charge sheet and statement of allegations under police disciplinary Rules-1975 and Muhammad Naeem Khan SDPO totalai was appointed as enquiry officer, the enquiry officer recommended the defaulter concerned for punishment. Subsequently he was called in orderly room on 15/10/2018 b the then DPO Buner for personal hearing out he could not produce any cogent reason for the satisfaction of the then district police officers, Buner resultantly a final show cause notice was served upon the delinquent constable and he was provided another opportunity of personal hearing but he could not produce substantial documents in this defense. In light of above the district police officer, Buner awarded him major punishment of dismissal from service along with deduction of Rs. 17000 from his salary for distribution amongst the TOs from where had extorted vide his office OB No. 156 dated 24/10/2018.

He was called in orderly room on 14/11/2018 and heard him in person. The appellant pleaded that he has collected money on the directions of Traffic Incharge. Therefore, a denovo enquiry was ordered into the matter and Addl: SP Swat was appointed as Enquiry Officer. The enquiry officer recorded statement of the delinquent Ex-Constable Naseeb Ur Rahman No. 115 wherein he stated that he has collected Rs: 500/500 per head from 34 Traffic personal for the purpose of signboards etc and paid Rs. 17000/- to ASI Muhammad Ali. In charge traffic district buner in presence of Constable Ismail No. 512/SPF and Irfan Ullah No.522 of traffic staff buner. Statement of both the traffic constables were recorded wherein they stated their unawareness about payment of money to ASI Muhammad Ali. In charge traffic Buner. Hence the enquiry officer held him guilty for the charges levelled against him. Therefore his appeal for reinstatement in service is hereby filed.

Order announced.

(Muhammad Saeed) PSP **Regional Police Officer**, Malakand, at Saidu Sharif Swat.

11914/E, No._ Dated 11/12/2018.

Copy to district police officer Buner with the directions conduct denovo enquiry against ASI Muhammad Ali, incharge Traffic Buner into the matter and submit his report within a week time positively. This is with reference to your office memo: No. 6587/Enquiry dated 05/11/2018. Service rule Fauji Missal and complete enquiry file of Ex-Constable Naseeb Ur Rahman No. 115 are returned herewith record in your office.

c.4.c

Annex (NO. /Enquiry.

2018.

10

Dated 07,

CHARGE SHEET

1 Sadig Baloch, District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, hereby charge you <u>FC Naseeb ur Rahman</u> <u>No.115</u> while posted to Police Post Torwarsak as follow:-

5 /

- FC Naseeb ur Rahman while posted to Police Post Torwarsak, it has been alleged that you at the time of your posting in Traffic Police as TFC, you have collected amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. You have deceived the officials and have collected money from them. Your this act amount to gross misconduct and negligence on your part which rendered you liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
- 2. By reasons of the above, you appear to be guilty of misconduct and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Police Rules, 1975.
- 3. You are; therefore, require to submit your written reply within 07 days of the receipt of this Charge Sheet to the Enquiry Officer under Rules-6 Sub Rules (i) (b) of Police Disciplinary Rules 1975.
- 4. Your written reply, if any, should reach the Enquiry 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.

5. Intimate as to whether you desire to be heard in person or not?

6. A statement of allegations is enclosed

(Sadiq Baloch) **District** Police Officer, Buner

Allerton

/2018 Dated

/Eng:

FINAL SHOW CAUSE NOTICE

I Sadiq Baloch District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, do hereby serve you, FC Naseeb ur Rahman of this District Police as follow:

(1) that consequent upon the completion of enquiry conducted against you by the enquiry officer for which you were given opportunity of hearing vide communication No. 57/Enq., dated 02/10/2018:

(4) On going through the finding and recommendation of the enquiry officer, the material available on record and other connected papers including your defense before the enquiry officer.

1 am- satisfied that you have committed the following acts/omissions specified in Rule-3 of Police Disciplinary Rules 1975.

You FC Naseeb ur Rahmań while posted to Police Post Torwarsak, that you at the time of your posting in traffic police as TFC, you have collected amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. You have deceived the official and collected money from them.

As a result thereof, I Sadiq Baloch, District Police Officer, Buner as a competent authority, have tentatively decided to impose upon you one or more penalties including Dismissal from Service as specified in Rule-4 of the Ibid Rule.

• •

You are, thereof, required to show cause as to why the aforesaid penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this Notice is received within seven (07) days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

(Sadiq Baloch) District Police Officer. Buher

Copy to the

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SHO Daggar with the direction to serve the copy of this Show Cause Notice upon FC Naseeb up Rahman, through DFC or Constable and copy thereof may be sent to this Office.

AND

DISCIPLINARY ACTION

l <u>Sadiq Baloch</u> District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, is of the opinion you <u>FC Naseeb</u> <u>ur Rahman No.115</u> while posted to Police Post Torwarsak, have rendered himself liable to be proceeded against departmentally and committed the following acts/omission as defined in Rule-2 (iii) of Police Disciplinary Rules 1975.

STATEMENT OF ALLEGATIONS

- 1. <u>He FC Naseeb ur Rahman</u> while posted to Police Post Torwarsak. it has been alleged that he at the time of his posting in Traffic Police as TFC. he has collected/demanded amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. He has deceived the officials and has collected money from them. His this act amounts to gross misconduct on his part which rendered him liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
- For the purpose of scrutinizing the conduct of said officer with reference to the above allegations <u>Mr. Naeem Khan SDPO Totalai</u> is appointed as Enquiry Officer under Rules 5 (4) of Police Disciplinary Rules 1975.
- 3. The Enquiry Officer shall conduct proceedings in accordance with provision of Police Disciplinary Rules 1975 and shall provide reasonable opportunity of defence and hearing to the accused officer, record its findings and make within ten (10) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer under Rules 6 (v) of Police Disciplinary Rules 1975.
- 4. The accused officer shall join the proceeding on the date, time and place fixed by the Enquiry Officer.

(Sadiq Baloch) District Police Officer. Buner

OFFICE OF THE DISTRICT POLICE OFFICER, BUNER

Schuber of /Enquiry, Dated Daggar the Schuber /2018 Copy of above is sent to:

- The Enquiry Officer for initiating proceeding against the accused officer namely under Police Disciplinary Rules, 1975.
- 2. Concerned defaulter through SHO Daggar.

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ANIN

بعدالت gli for ing ور ان و انه المعين الركن بنام دعوكي باعث تحريراً نكه جرم مقدمه مندرجه بالا میں اپنی طرف سے واسطے پیروی وجواب دہی وکل کاردائی المتعلقة أن مقام مروس كرسيو كم معالي عنا المكادر وكالدول ي مقرر کرکے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختياط ہوگا۔ نيز وکيل صاحب کو راضی کنامہ وتقرر ثالث و فيصلہ بر حلف دينے جواب س دی اورا قبال دعویٰ اور درخواست ہوشم کی تقیدیق زراس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا ایپل کی برامدہوگ اور منسوخ ڈائر کرنے ایپل نگرانی و نظرتانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاردائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شده كوبهي جمله مذكوره بالااختيارات حاصل موئك اور اسكا ساخته ۔ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ وہر جانہ التواے مقدمہ کے سب سے با گا اسکے مستحق وکیل صاحب ہوئے۔ نیز بقایا وخرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب یابند نه ہوئے کی پیروی مقدمہ مذکورلہذا وکالت نامہ لکھ دیا ک سندرہے r. 4 المرقوم والمشيده السعد ند بیش بیش بیش کے لئے منظور ہے esteel and accepted by shows-alter by

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL PESHAWER

SERVICE APPEAL NO.83/2018

Nasib Ur Rahman No.115/ R/O of Mekhban MalakandAppellant

Versus

1. District Police Officer Buner

2. Provincial Police Officer Khyber Pukhtunkhawa Peshawer

3. Deputy Inspector General of Police , Malakand Region at Saidu Sharif Swat.

.....Respondents

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3.	Authority Letter	• 1 · · · · ·	4
4.	Charge Sheet and Statement of allegation	A-B	5-6
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NOSWERAWAN INSP; LEGAL BUNER (Representative for Respondents)

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BEFORE THE KHYBER PAKHTUNKHWA SERVICË TRIBUNAL PESHAWAR

Service Appeal No. 83 /2019

Nasib ur Rahman Ex-constable No.115 r/o Village Mekhban Malakand

..... Appellant

VERSUS

- 1. District Police Officer Buner
- 2. Provincial Police Officer Khyber Pakhtunkhwa Peshawar
- 3. Deputy Inspector General of Police Malakand Region at saidu sharif swat

..... Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully sheweth:

Preliminary Objections:-

- 1. That the service appeal is time barred.
- 2. That the service appeal is not maintainable.
- 3. That the service appeal is bad due to miss-joinder and non joinder of necessary parties.
- 4. That the appellant has not come to this Tribunal with clean hands..
- 5. That the appellant has no cause of action and locus standi to file instant appeal.
- 6. That the appellant concealed the material fact from this honorable tribunal.
- 7. That the appellant has been estopped due to his own conduct.

<u>FACTS:</u>

- 1. Para No.01 is relate to the service record of the appellant hence need no comments.
- 2. Incorrect: the appellant during his posting in Traffic staff Buner collected some amount from police officials/ traffic staff by pretending that huge sum has been consumed on opening of traffic warden system and the appellant deceived the traffic police officials. When the matter came into the notice of respondent No. 01 then after facts finding enquiry the appellant was proceeded departmentally, charge sheet and statement of allegation were issued to the appellant. The Enquiry Officer found him guilty and recommended him for major punishment. The respondent No. 01 called him in OR and heard in person but he could not produce any cogent reason in his defense. Thereafter final show cause notice was issued to the appellant but his reply was received unsatisfactory. After fulfilling all the legal formalities he was rightly dismissed from service. Further more in this para of the appeal the appellant himself admitted his illegality. (Copy of Charge sheet, statement of allegation ,enquiry papers and final show cause notice are annexed as Annexure A,B,C and D respectively)
- 3. Correct to the extent that the appellant filed departmental appeal before the respondent No.03 who called the appellant in OR and heard in person. The respondent No.03 being departemental Appellate Authority ordered for denov enquiry proceedings. The denov Enquiry Officer also found him guilty for

allegation levelled against him .Therefore his departmental appeal was rejected. (Order copy of departmental appellate authority as annex : E) Hence the service appeal of the appellant is liable to be dismissed on the following grounds.

GROUNDS

Prayer:

- <u>A.</u> Incorrect that the impugned officer order being passed according to the law, rules and justice.
- **<u>B.</u>** Incorrect: that the appellant was treated according to the law and rules. No violation of the relevant law has been acted by the respondents.
- **<u>C.</u>** Incorrect: the whole departmental proceedings against the appellant is based on facts and there is no personal ill will or ill intentions are exist on the part of respondents but the appellant has been estoppped due to his own conduct.
- **D.** Incorrect: the appellant was associated with departmental proceeding, his statement and statements of the other relevant persons have been recorded by the EO. Opportunity of self-defense as well as cross examination was also given to the appellant and after proving him guilty he was rightly dismissed from service.
- **E.** The respondents also seek permission of this honorable tribunal to adduce more points /grounds at the time of arguments.

In view of the above detail comments on facts and grounds it is humbly prayed that the service appeal of the appellant may greciously be dismissed with cost.

> Provincial Police Officer Khyber Jakhtunkhwa Peshawar (Respondent No. 02)

Deputy Inspector General of Police Malakand Region at Saidu Sharif Regional PoliceSofficer, Malakand at (Risspanned: St. No.03)

and the

District Police Officer Buner (Respondent No. 01) Distt: Police Officer. Eurrer

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 83 / 2019

Nasib ur Rahman Ex-Constable No. 115 r/o Village Mekhban Malakand

.....(Appellant)

VERSUS

- 1. District Police Officer, Buner.
- 2. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
- 3. Deputy Inspector General of Police Malakand Region at Saidu Sharif Swat.

..... Respondents

AFFIDAVIT

We the above respondents do hereby solemnly affirm and state on oath that the hole contents of the accompany Para-wise comments are true and correct to the best of our knowledge and belief and nothing has been concealed from this Honorable Tribunal.

PROVINCIAL POLICE OFFICER, KHYBER PAKHTUNKHWA PESHAWAR (Respondent No. 02)

DEPU OR GENERAL OF POLICE, N AT SAIDU SHARIF SWAT MAL Regional Police Officer, Malakand at Saidu Sharif, Swat

DISTRICT POLICE OFFICER, BUNER. (Respondent No. 01) Dist: Police Officer. Buner

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 83 / 2019

Nasib ur Rahman Ex-Constable No. 115 r/o Village Mekhban Malakand

.....(Appellant)

.. Respondents

VERSUS

1. District Police Officer, Buner.

2. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.

3. Deputy Inspector General of Police Malakand Region at Saidu Sharif Swat.

AUTHORITY LETTER

We, the above respondents do hereby authorize and allow Mr. Nawsherawan Inspector Legal Buner to file the accompany Para-wise comments in the court on our behalf and do whatever is needed in the court.

PROVINCIAL POLICE OFFICER, KHYBER PAKUTUNKHWA PESHAWAR (Respondent No. 02)

DERUTYINSPECTOR GENERAL OF POLICE, MALAKAND REGION AT SAIDU SHARIF SWAT (Respondent No. 03) Regional Police Officer;

Malakand at Saidu Sharif. Swat

1 Alexandre

DISTRICT POLICE OFFICER, BUNER. (Respondent No. 01)

Distt: Police Officier. Buner

Annez

Dated 07,

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/Enquiry.

2018.

CHARGE SHEET

NO. 134. RT

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04.10.0

1 <u>Sadiq Baloch</u>, District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, hereby charge you <u>FC Naseeb ur Rahman</u> <u>No.115</u> while posted to Police Post Torwarsak as follow:-

- 1. FC Nasceb ur Rahman while posted to Police Post Torwarsak. it has been alleged that you at the time of your posting in Traffic Police as TFC. you have collected amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. You have deceived the officials and have collected money from them. Your this act amount to gross misconduct and negligence on your part which rendered you liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
- 2. By reasons of the above, you appear to be guilty of misconduct and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Police Rules, 1975.
- You are: therefore, require to submit your written reply within 07 days of the receipt of this Charge Sheet to the Enquiry Officer under Rules-6 Sub Rules (i) (b) of Police Disciplinary Rules 1975.

4. Your written reply, if any, should reach the Enquiry 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.

5. Intimate as to whether you desire to be heard in person or not?

6. A statement of allegations is enclosed

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(Sadiq Baloch) District Police Officer, Buner

DISCIPLINARY ACTION

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I Sadiq Baloch District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, is of the opinion you FC Nasceb ur Rahman No.115 while posted to Police Post Torwarsak, have rendered himself liable to be proceeded against departmentally and committed the following acts/omission as defined in Rule-2 (iii) of Police Disciplinary Rules 1975.

STATEMENT OF ALLEGATIONS

- 1. He FC Naseeb ur Rahman while posted to Police Post Torwarsak. it has been alleged that he at the time of his posting in Traffic Police as TFC, he has collected/demanded amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. He has deceived the officials and has collected money from them. His this act amounts to gross misconduct on his part which rendered him liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
- 2. For the purpose of scrutinizing the conduct of said officer with reference to the above allegations Mr. Nacem Khan SDPO Totalai is appointed as Enquiry Officer under Rules 5 (4) of Police Disciplinary Rules 1975.
- 3. The Enquiry Officer shall conduct proceedings in accordance with provision of Police Disciplinary Rules 1975 and shall provide reasonable opportunity of defence and hearing to the accused officer, record its findings and make within ten (10) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer under Rules 6 (v) of Police Disciplinary Rules 1975.
- 4. The accused officer shall join the proceeding on the date, time and place fixed by the Enquiry Officer.

(Sadiq Baloch) District Police Officer. Buner

Annex-B

OFFICE OF THE DISTRICT POLICE OFFICER, BUNER

SG 1/9-10 /Enquiry, Dated Daggar the 0)/10 /2018 No. Copy of above is sent to:

1. The Enquiry Officer for initiating proceeding against the accused officer namely under Police Disciplinary Rules, 1975. 2.

Concerned defaulter through SHO Daggar.

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16-10-18 بنا من الكرابي الما معالم المحال المعالية المحال الم 5499-50/Eneuiry i de Ilpa 02-10-2018 The OPO Tight 13 S4999-SO/Enquiry i constitute 10 100 خل المرمون ولي - مرتقع من الف الرحن 115 من الرس المران المرابي الزام المرادي ما معرف و فر الله ما الما المحالي المراد الم المكان في المحرف المراجل المراجل المحرف المحرف المحرف المحرف apple de le ser tructural site مے- مزکرہ کے میں انوازی علے سالات کے خاطر حق مزم ن AN مرك طرطان حارك بودانوس ساراتكرار مع الزاري بودار الزام على 7.41 ASi de a The 1. 4 1 21 15 0211 - we de To adjute To. Of alle Tofte die Too den of the To assignation in in to it at To ideolisit 1145 de 1,997 - 3001, 1043 Juloi UNE To del 489 1/21/10/ The 13-jan, 569 11/10, 228 Julie, 995 . Ju 1572 Jul 10 53 Julie 75, 1228 50 . 701 Priliple 129 6/2 374 Jenije 522 11 00 + 811 de vour 728 0 - 1.684 00 100 36-11/4/260 2 Jos TFC 11 2 159 02 - 10, 1023 11/1023 2 - 11 - 610 0 1217 1217 14 de 709 6 51 1 4 56 ilon مار جاف انكوانوعا على طريق = = جرم البرام على تقل لف المطار IIS - UL E UIE 1 36 Logte E Aside a find 7- 13101 مريد في من من 17 رايان في من من 17 من من الجن العالمي المحالية ر المجع المرابع المالية في محمد مرجم المركز المراب الم المحالية المراجل في الرحن الانعان الف المحالي المحالي في ارو جرب کے 34 ان کارن ٹر سف جم حالج 40 آر ج 4 ک ار جار توانار 7 ار الح الم الى مان ASI مان كار الى الم

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DISCIPLINARY ACTION

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(Sadiq Baloch) District Police Officer, Buner ŝ

OFFICE OF THE DISTRICT POLICE OFFICER, BUNER No. 5(1/9.1) (Enquiry, Dated Daggar the 5(1/9.1) /2018 Copy of above is sent to:

 The Enquiry Officer for initiating proceeding against the accused officer namely under Police Disciplinary Rules, 1975.
 Concorrect defaults at a RUS 2

2. Concerned defaulter through SHO Daggar.

CHARGE SHEET

I <u>Sadiq Baloch</u>, District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, hereby charge you <u>FC Naseeb ur Rahman</u> <u>No.115</u> while posted to Police Post Torwarsak as follow:-

- J. FC Naseeb ur Rahman while posted to Police Post Torwarsak. it has been alleged that you at the time of your posting in Traffic Police as TFC. you have collected amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. You have deceived the officials and have collected money from them. Your this act amount to gross misconduct and negligence on your part which rendered you liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
- 2. By reasons of the above, you appear to be guilty of misconduct and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Police Rules, 1975.
- 3. You are; therefore, require to submit your written reply within 07 days of the receipt of this Charge Sheet to the Enquiry Officer under Rules-6 Sub Rules (i) (b) of Police Disciplinary Rules 1975.
- 4. Your written reply, if any, should reach the Enquiry 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.
- 5. Intimate as to whether you desire to be heard in person or not?
- 6. A statement of allegations is enclosed

(Sadiq Baloch) District Police Officer Buner

/Enquiry

÷, * *

2018.

Dated 07

الفازان العب البول عبر ترجا معرفه والمربية المصلح المرار. of in the second the state to be con in the المان لمرد المراجي من المرجم فر الله الم الله الم e Asicilità de la consiste as a classo Unito Unich ligion polifé-cierte كالمانك وإلى المروس ومروس والماسي المعرفي المعر tojo il is the ilout the bold in timp fill on 2 Of The propring we we a brald fill and a contraction peting Tes isteriuleurun user 300/ 200/ por be USE 34 4 Jour 500 2 US 2/3. 2 populit in die in Soop ist Allestelle in file of the state in file for Allestelle al ian Jule - 2 Willing and Ent - 67.61 DSP/Jolulai 20-00-11 vice vice bile to l 2 - CIN 2-2 de prode de fortes S-00-00 un un ciper - 1XX جليد في حرابة عار ٢٥ اور عاجر ٢٥ في حالي S-Gerere Ulevier = 1 XX $\frac{1}{2} = \frac{1}{2} = \frac{1}$

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(1) <u>3</u>(1) 50027 Seo 500 TR de 1 (33 500 (:22 ie (23 الم حين 3 500 500 75 30000000 (2. Ci 5002 Kill 10/28, winte 26 500 27 2 Juli 1 500 93 3 (28 5.0 Sel D .5 A. 500 0 ¢



سیلی میں کہ عرصہ کوماہ سے بحثیت انچارج ٹریفک وارڈن یو نیر تعینات ہون دوران تعیناتی اپنی ڈیوٹی ایما تداری ہے خود بھی ادا کہ انہوں اور ماتحان کو بھی ڈیوٹی ایما نداری سے اداکر نے کی تلقین کرتار ہتا ہوں ۔ مزید سیر کہ حالیہ شروع کردہ ٹریفک وارڈن سٹم کی وجہ سے گاڑیوں کے ڈرائیوران سے نہات خوش اخلاتی سے پیش آنے کے بارے میں ماتحان کو دفاً فو قباً افسران بالا کے احکامات ساتار ہتا ہوں ادرعوام الناس کے ٹریفک کے بارے میں شکایات کے فوری اذالے کرنے کی کوشش کرتا ہوں اور دوران تعین ہوں کردہ پر ایک احکامات دیتار ہتا ہوں، Southand کو ایک کر ان کو بارے میں تا حال کو کی کوشش کرتا ہوں اور دوران تعین کر کا میں ا

کردہ شکایت کے بارے میں بتا تا چلوں کداں قتم کی کوئی حرکت نہ میں نے کی ہے اور نہ ہی میر کے گنرز، ڈرائیور یا دیگر TO' وغیرہ نے کسی سٹاف ممبر سے کمیش نے کہ میں کوئی رقم مانگی ہے اور ندائ قتم کی حرکت کا سوچ کر سکتا ہوں، اس بابت میں نے با قاعدہ گنتی کر کے جملہ وارڈن سٹاف کوتی سے مدایات دے چکا ہوں کد افسر ان بالا کے نام پر یا میر ے نام پر کی کور قم ند میں اور اگر کسی نے مطالبہ کیا تورقم دینے وارڈن سٹاف کوتی سے مدایات دے چکا ہوں کد افسر ان بالا کے نام پر یا میر ے نام پر کی کور قم ند میں اور اگر کسی نے مطالبہ کیا تورقم دینے وارڈن سٹاف کوتی سے مدایات دے چکا ہوں کد افسر ان بالا کے نام پر یا میر ے نام پر کی کور قم ند میں اور اگر کسی نے مطالبہ کیا تورقم دینے وارڈن سٹاف کوتی سے مدایات دے چکا ہوں کد افسر ان بالا کے نام پر یا میر ے نام پر کی کور قم ند میں اور اگر کسی نے مطالبہ کیا تورقم دینے سے قبل میر ے نوٹ میں ضرور لائی میں ٹر لیفک سٹاف میں قبل از میں سے بحث ہیت انچار دی آ ایک سال تعینات رہا ہوں، تا حال کی پرائیوٹ مخص یا پولیس اہلکار نے میر ے خلاف شکا سٹاف میں قبل از میں سے بحث ہیت انچار دی کا موقع دیا ہے، جس کے بارے میں ساز اللی شخص یا پولیک سال تعینات رہا ہوں، تا حال کی پرائیوٹ شخص یا پولیک اہلکار نے میر ے خلاف شکا ہوں میں میں تر یک کی کو شکا ہیت کر نے کا موقع دیا ہے، جس کے بارے میں ساز اللی سٹاف اور ڈرائیوران / عوام الناس گواہ میں ۔ مزید یہ کہ تر میں اور میں اہلکار نے میں ساز کر ہوں میں اہلکار نے میر ے خل میں اور میں اور میں میں نے کسی کو شکا سے ٹر لیفک سٹاق ہو نے میں متعین اہلکار نے میں ساز کر نے خل ساف اور ڈرائیوران / عوام الناس گواہ میں ۔ مزید یہ کہ تو تی از کر ان کر میں ہو نے میں اور ان بالا صاحبان اپنے ذر ان گو ہوں کہ میں پر میں کہ میں میں کہ میں میں میں کہ میں میں کہ میں کہ میں کہ میں میں میں کہ میں میں ہو میں میں کہ میں میں میں کر میں میں کہ میں میں کہ میں کہ میں میں کہ میں کہ میں کہ میں میں کہ میں میں کہ میں کہ میں کہ میں ہوں کہ میں ہوں کہ میں ہوں ہے میں ہوں کہ میں ہو ہوئی ہوں کہ م اگر کسی اہلکار سے اسی کہ میں رقم کی حصولی کا مطالبہ کیا ہوتو اسکا جھے کم میں ہو اور نہ ہوں ہوں کہ میں ہوں کہ میں ہ

یہی میرابیان ہے جو کہ درست ہے۔

Le z محمعلی خان ASI انچارج ٹریفک وارڈن سٹاف بونیر ××× آب نے کی الرحن سی کے ملاحت رکورٹ کھی ۔ 2. ؟ یس یون نے لعب الرحن نے ملاف سی سم Attested ، میں تکھی ہے ، المحالی DSP B tak 10/10/2018

بالال مرف الشر حل من شر مف طاف الشرapplied to pile line E. will A TIGI Sing Topper of 21 - 10 10 ما المحرم بينا بين مريم ومري الرائي الريان الريان الريان الريان الريان المرين الريان المرين الريان المرين الريان Undan entra tente To To loiper 2012 -2- -0-2-2- il. ho -2-60 S. Jei - planing and XX 522 Juliju White the left in E-2 - the with The a company of the Time The and and the in a set of the Set 11 Se purviere Allested DSP/Tolerloui

it to pis SP2 dele Wilde At (i) is all infight to un é- l'éle in the service and and the service of the اور نے اس وسی مشال کر کے جار کے - reput - ici on xx Jermiel 271 APARTSPOLIE - 67.131-10-05-14 - 12-04 A ma mineral An chie - G. 67, - 10contraction and the man in the second of the 2 billip Asjointe - 10 - 5. SIZ Upe Lor Attested ell aller DSP/Totalou

 $\frac{8}{75}$ بان ما مو شرعب فرض بومز می لفیات سون میا بونغ الم الم ويكر ت وحول ك لا من في تو تق مو الى ابر لف الرعال مقم حرج مون محموت مورم مر تحف تحالف كنسي مدين ما مرت اللي ان ف الي الي حرم) ما الم مجرى ما اب في امح مد مح مع خرا / وي مس الف الرحان مركز من رفع من رفع من من مركز عن مول م . a com sé ja por WHIS 2 - En Proper Allested 03319180438 = Alla La Lalai

 $\frac{1}{\pi} \frac{1}{\pi} \frac{1}$ سان کیا یم مشرعی فاردن لومن میں دموجی مردی مرد با مرا مورخ جراحد كوميرا بازر اصب مي ديون حق 75 ريكاز الحق كونون ر قبر عار عطومات رعمة . جمان من مر فعي الرعان ت القراس ا ا ا ۲ جت رو - اور ایک ورا من فع اری تو دیگر فرکوره فراو كما مى جار السية أ ف واله على مرمض واردن في مشتقرى في ال and i aj (12) - 1 - 1 - 1 - 100/ 500/ 5 (2) 6 and مر ای درون - مر تن بن اعلانی نے نعب الرف کو من م د مرق - من سرا بنان حال درست ب Set. ا فَتَرْضِيْ 228 مُسْفَى دُرِضْ دَرِجْن Th · 6066720 60 20100 mob=03339079663. میں شما قسم کا کر س کردنا میں طابق ہو Resided. فركوره كالمان مفقة مي مي ي DSP1 To Lader NS UGJICE

Mar Si ja 684 's De Villet Mon - de la la function i 115 volt al coolet our sol burg Vilal-Stel Section C- 152 ENDISielije ilour when the indering مح المرد المرد المرد المرد المرد المرد المرد المراجع المراجع jojipper de com- 200- 200- 200 - Z Under One Zurd - 2 Soof 24 OKhr el periol 684 infrave Diffe 684 10/10 - Unite With a w - 2- ch - and - bandi ATTested. the el DSP/TOLalai 115 ilen - a for

 $\frac{1}{TFt} = \frac{1}{TFt} = \frac{1}$ مان تون مي من شرع وارون لو سر من تعنيا 2 ماري مي من جار مار مربور متار 37. مل المس العان في المرقان م مع جبر در میں مرتب فرون ، اختار میں اور سران المواقع من المحم ومرس . حسان مرار و لف المرعان لو 6. 4. 6. 6. 1. 5 v Sool 4. 6. 3. 2 8. 12 To درج من جرب بی وجون ، And STR STR · L-04.6 72 02 - 1000 عیں فرکورہ برجی قم کا کار می تی کر کا کا ترک سوں مركوره كاسان حصوت مرفين ب Attested. MS UCUL DSP/ToLalui

Will strend So vide Provide Ve ison ill interesting a cil $\frac{1}{100} \frac{1}{100} \frac{1}$ Fellewit Eastellidet - Constant وي - روالله من من المحالة المراب من المحالة المراب المحالية vol prime tout Experies Elle 2 pour opt 16 cm apt le opt colo is love de la la comptine la comp To the intico is in al 2 The parts This de the to day to Song de porte de la file at ingling way in the son son at i com Subscher file of the tour ci 2 - 2 01 1 2 - 47,00 (Internet) = Génerger & Scopper in 144 الروم من مر المراج المراجة من المراجة · Lieve Lorg from J. in the ATtested. I will DSP/Totalar

The start and 1228 is white Population it is the Edde - Usellinger la tilger ad upor i ca - 25 tour Liter Sleit alle piles de siente de un service Cupper Sont 2 con Com JI. 2 1 The population of the Side الم في في الم الله الله الم الم الم الم الم الم الم 5-200/ de 10 - 200 - 200 - 200 - 200/ 2 Juppen - Un and - Of Zordes - LUL 6/1228 copier M get ell and with the spin of the - 1228 coj attested. m. el 115 0 2 Minod Marilie DSP/Totalai

مان زن نا مون الرسيم المحر مين مارون لو سرطل من م مان ما من شرفت واردن اور من داوی مرافع مرافع مر المر 14 موارى أكر مرا ما ي هو جرد لعي الرمان م الموجود في 70 نتار المرس مر جمع وحول كي . لف الرجان في مكارم شرست وارد ب امتاح والجارج عامم فر إموان متح الم الي صرح الم محر وي . حرب القرام الفق الم من تما المن كفي لي میں نے اس بی عب نیے ارمان کو مرحک میں دیرا. ہے اس بھی موجود تھا۔ یہ درا سان مے جو کہ درستے ہے ci luni N مارون المرستي ام² منين وا ذن in pas die L'élie 6 701 L'entierté co anob=03469135746-جائ خان کی فر کا زمن میں زود تا کا مرکا . مزكره كابيان مققية ج في سى Attested. 115 juje All all for DSP/Votala

judición 229 00 00 00 1229 TR منان ما مرس من فرس من في فرين من في المان مول . مع فريز مردا كو صرا من في حظ موارى من ديونى من جي جي وميل ارتر ا معن بازو تو فرا بار مع المرفان م الله مال مان مر مرفول ال الفصار فان ما فلا من من من من من من من من المرتباح في المرج في gi soofeiere angeres are provision en jou فعی از مان و در ۵. ی در ایکان چی در مان an Jupuin ETA USPRICE ili 12 28 10/18 i ci ja 03419167567 من تو من من من من من من من من مروانا ع من سر ل . فرود ما بان حصقة برمن ب. 115 Uleringo's Attested. UT Uleringo's Attested. DSP/To Talai

بان آذان حفرت ولى TFE ونف فرزن لو مر باز من مرتب فردن ساف من بخش عام الميات مول. غير ت چه المرز أفروش فإن كرت ه مرالع فون رادل را م م ويق 16 juon of 100 1 W 25 200 God un ché ar من لفي الرى فرمود ب. ان من كم وحدل زير ، جا من كمره مراكم . قدرا نامر نفي ارحان أران عامة عران TF بني هر ودن. من رفع وحدل من الم مورن لغيه الرفان با عدم عارض صر بیش میل اور میل می در نسب مین صر قم حو الحرما مول ترين ابني مرحم مع رجم وين مساغار طري ولاذل من جماحی شقی اسکان قرار می در قریم اس ایر کان کان (10/2) and 500/ 6 - in - is i in 1/1/16 year 300 200 500 كوديكر جن نے ميں آب ميں دورج ، مزمر لادا موں ، ميں مرامل. is 's cie the side of the office of Control of The Bring 2 in the lite Allested Me l' 115 july 1 - me A man DSP/TOTala

ميان آزان سجار الملك <u>569</u> مشيخ شمني فرمني فرزن الوسير المان مون كم من مرتق فر ون من تسعيد ون من مرا المراب از میں وہ وہ میں کا مورج جو 23 کو میں نے افسے الر عالی المرز کو فون مسارعاً جب جرزمان كوديا مون مين فريف ماردن تر انتيام میں رغم جر جس نے اس کے لائے اور محمد جو زیر میں مرزمان لو مك تراب إلى مع العيمال عن لو در مساريكي مراغردن مر کی پر در مان نے اردان کو 500 میں در میں نے اول مو المحد دی - ایر قدروان نے میں میں مح فور کی . س a 200 19 - 6 6 1 m ing (1) 2 (1) 569 2 (1) 50 - 569 2 (1) 500 · init 559 Euci, 6 2 un ANOB + 03333704598-مي تى قم كراس كرور) من ط ش مر وروع بان معقبة بر فسن م 115 001 - Attested. Mallin Mi DSP/TO Lalai

judicie (29) TR Wide 228 Julie (10) بان مار ، عین جرم جردن بر س دیرد مرای جر مست المعرار والمراح والن ما مارا مس من الفي المرعان فري سرار مون اصلاح دی کم اکرانی جی و مول رس میں جو تر و ان لفيت الرعان مزكر وف فق مربى كما ، تم في فارون استاح ميام مروس برن بن من مون من من من من من من من من تر المرج دار شاه کو محک معج در الحوان مراور و کا داری از وی ا 02 1) - 2 500/ - 6 16 200 5. TE 202 1. 6 00 كوفال أرة مرا جير ان ال ومرل مرد - الم در الم الم محک مروح الفی المرحان کو در موسی وجول کرده مح حوال مول ezza é e je tras Hellah I jur 2 228 juicie e LUCETR WISES in جه سرمین می فتم کا تراسی موں زکا کی ترک مول 03329698743 -عرى نائد مركوره كاليان معقبا برمن ب Attested. Is served Halle DSP/Totala

0'2 10 12 195 100 1995 100 013100 4 \$ 13 - 200 . Up 2 find and for all and . U's and من ون لارن در من حوف تحاري نعب الروى ن مرارم فول اطراد ن دى ، از الم ويك وجول ز. مي وارى بوك از لغ المون فروم فير وحول رف جمان فوس وطالم مكان فرمف فرازن محافظام مرج فروج في المعان المعان المحافظ في المحري المحري المحري المح ما فراد الم الرفان كو 20 مود مل من مراسان الم i Bader 1 Si June 995 /m. حس) ميم رومي في كارين من V 034318330085 · Up 6 6 6 6 2 1 مراز و کا بان مقتق مر مری ب 115 in sterier Allested Anna de Lalo

بالالعون، مرتف فرون من مشا المس الم من معول جي عشن الطان ما ره عده عبر 1 مل ما العيار ال WETTE URAL EN ON GO ETO SLETTE وی دموں زیادی تو ایت المان نے کا کم شریش ماردن نے المر در دن لوم من من عن فو مورى فو و مر مارى فو و مر مان من العياد الم الم الم الم الم الم و من المون في مرا بالم الم الم الم الم الم الم الم الم - cin in it is and com and sty do cicular into marine in the internet mob=03339689168 -مين ني آ شيرس جو ني آن شير سي المان ما بران سي جو مي مراجع کی فی تراس زور نا سی ی می سی سول . مرکوره کا بیکان صفیق ی می ی M 11 115 in 115 CT Attested. Mar M. DSP/Tolalar

But the support of the for Call 1/ Inpland un Silp - un Judit Lever South Estre logod Love the i die to be a fal de iter a volting to to Tippinger Vir is the de i love a very could W- Un gove i to will work to it in 12 in the in it is it Souper Lone - Joseph Tillicit 2 bopin of ficilippie un - yes Juss E, Jurophis and in - Lile Soor profile 27 10/2 2 iv for sof de forfice i un 2 compa de la contra lova Bel.w // al logent for the state of the Trested MR el SP/10 Leile 115 ingui me

-20 (10) 200 1043 - 32) TR مان مس مر من ساف موسر من معنا 2 تما معرف فروم ش در بر میں مان سے درن چیں ہے۔ موار مورج 132 کو میں لفر المروى كو مزارم فون من م مشن جسك مراج م من . لغر الرفان نے بی ایک جب ہواہے ۔ عرف وارق کی استار ہے رہے The side and - veres is 50/50. 2' 30 مو کال کر کے م لفیے الرفان کو میک مدی فرام کر فرار فریس اس مصرف فعر عراب المعنية المرفان مع ومر وحول ف ير جع من جن في مفت كم مركزة فا في الرفان كو إلى ezza de un por an l'el a gel 1 pine 1 من نامر مس طبيان. - ve 1043 Mipel جمار میں می خ کا درس میں ربط سامرں. 03430913236 = M M, MS CROJU = és CII Attested. DSP/To Ledai

is a man To of it un isite كو صرا ولوان بابا از مي ولو في مى معيد الرفان م فون مر سوارى از اس س چې وجول دیا. لغب الرقان نے چیک دیے وق این فرشی فود جرافتم د برا کا بی ورو میان کانی اب میرسیک مَنْ عِنْ فَيْنَ تَنْتُ وَى دونَ . لعَرْمَ عَنْ حَيْ تَشْ وَرُبْ مَنْ فَرُ مع المحمد من درم مل على مسر ممان من حوى درمي م india, 's car to show ! mob=034499541284. i i uno To ol' in in مياتى فى كاكر ما كردانا شى يى مرا مول . مر فرد کا بیان حقق و من ب Me ' 115 ile 11 mile Allested Mill DSP/Totaleur

35) - Sivil - For the Initial Blight Colder hand all signe colde 7.101-10 miliounal and its Louis an inter a una state Sonft- C-I is love a cites a c-I a c-I ion of Block of the second and and Elo -de XX - Aribarchi // - Sin wing to derel - Lover - in the - in the - 07-2-2-10 $\frac{1}{2} \frac{1}{2} \frac{1}$ -600-556 et ?? Upper Teo acour worked for XX Zuevilli il veru o 1-0702 -2 -19 5 2 00 200 - 1 - 2 - 1 - 2 - 1 - 0 - 4 4 ence object and a difference and a company Allested - in a proposition of the second of the seco

audra il ling a ce Me el 115 vertad

· Je el le per 610 pt juicitiet population is in a cit though be de la 21 bill is for 6 the un source is jugared - polation and and will vijuli ai a sola toutil 2 big int 2 Usur 1 big to bud et le fre 610 store معاد الزم على Un les of go Soof 2 and in 10 XX - 2 by Uniperior Uniperior Attested. tude! Appla DSP/Totalai 610 0 2

بان آزن طفر من <u>المحالم</u> منفي فرفين و رون فرسر بان ما میں میر فرج بار کو بر میں مرزن کو سر مر مر موج ۲ میں نے لفت الرقان سے معرف 14 کو سواری میں جنگ کے اے در کاف ی . حفول نے مما یا ، کم عیال کو اتھا جبک دیک ہول . الم مرمن فاردن کی استاح میں رقم خرج بران سے کھرا اب 200 س ومرد - عين لفي الرفان م وتر وحول رح مين سايا مر اب مر مالق رقم مك ب لعرف دول . المرى من نه لفت الرحان بالعرقي شيفين المنها كرام وى على الراسا بال TAP' 1 A TINGS in Will alm The is a single استاحی وج دیده متم مرغب مین بیج کے تحصی ج mob=0347400/697= ()Ali 1 مورب : ج ما العر علم ... Allested' Allested' TE Hillin 14 DSP/Totalar

مان آزان اعازالق <u>جمح</u> متع مرتب واردن لو سر Jucie - in othe when an of our of میں فری رقم لفی الرحان علم آری مع المان مع میں جی میں جی ایر الحق می ف وط لیر کی اور نہ شیف المکان سے ایس کی سے اس کی سے ا Japan, 02 ju 709 61 : 151 ry TR 03439600801. Meglin - 6'6 (m) - 14 ب = وحول کرده رضم تی لینے میں ریکانی سریل خبر 7 رور ب مراحد مراعت ماره من من کوشم مارشم من وی م Attested the II is the in the in the in the in the internet when the internet is the internet in the internet is the internet in the internet is the internet in the internet is the in DSP/rolalar

- 1 - 1 - 2 450 is in vilit 13 Pro- ge - Lifer och Sigur E-side Upper sector on a bit of the starter for lipes and loge to prover all مع مع مع مع مع المرض المرض والم عالم 2 hope in interior interest a content in horas to also ap in 456 jupp an it lind it is a property of a grand 5 2 0 9 9 00 - 2- U- 1-3/E-1-23-U- 2-2-2-2 Tip of the rich of the at an - Un 2 life and Soop of a man - i a com an inte - 2 - - - - - -Autopillion - Euplin - use itested. (Pelinter) W. W. S. S. W. DSP/ToTalou 20 is 456 is how

 $\frac{(40)}{F_{E}} = \frac{(40)}{260} \frac{360}{F_{E}} = \frac{(1+1)}{100} \frac{1}{100} \frac{1}$ مان من من شعب ماردن بو مر مي ديري مراد مر ما مر سر - لعباني ت دوران محوت مي بي المعار مر العبار في في المرتب م من في الرب المرام من من في المرسم الملك الم رائم و تری شرکا افردی می و می در اسان می کردست Contraction of the contraction o 0 346 943 4 543 بد مور فی بن ب مراب مرافق کا استاح المصالى حرد في التم شريف سكاف مج كرم، ور - - ج ان الح ال ال ال ال الم الم الم الم جیں دیں ام مسلم المر : - مقم می وجولی می دست می می ایج نام سرس مر الم الم سرور ج محق مدی وجولی قریب می در در با ج حواب : - جى مليك بي مالكول عداط ين - حس مد الم كوكون المم ملى ديا ين wai 360 UTE DSP [To Lalm

ing ice with ene 1200 & Ejer Cijich. Up 2 Lie The Lis wo con is a sing of un is the عمر مح موازى في من من شرعا ما فيون ما تم في فيس الم من برج جتر من ع الم الركون تشي مرابع الما هون Be 16 is a bill come a pil The Usinge اور ده چې تنزې ريا يا جب مي تمره وراكي . تو لفت ارون ن مع جبر، دی ار مح من می می مرح اے حواظم دی مرا مر ماد ما محر رو . مین کا کرمر می با ما مادی اخر میں ک لعرمي المكر ورفك القرب الترجي ولالعد الي فر عرف في ولادن لوس مر من مان محم مان محمات مان محمات محمات معمان مرد م عمين المتركى عم مد المرابع عد مى دولير ومرك ولاي متم في وعالي وطالب كما مع ارت الم حور في في المرت الم مراس في محرور ا ميان ين كر اس ب بع واس في شارد الإ ممس and 1260 3 = is به تنازی کو شرمین و رون می و رمی ا 9 - 62 25 29 - 6 6 July 62 03449627009. حاب ت في الرقان ف جير ب وفن في شريف طردن برم جر Allestell All alas serve and and and and a server a varied ورب ... حي من حس ب ري من حم كا مرقم من دى ... الم يعل - 2 1260 p3 - 20

No is le The mine wir in ou بال دميم مي د نيس ماف مي ورفي كرم دارد مي المادي من ويوني تها المو مد ور مثل من ويوني تها . الم المر ورفيل افروش فان نے مرابع فون رطلاح دی ، محان دارہ عرب ا ار این جی وجوں کریں. میں کھان کا زہ سوری آر امریک المرائع جوجوی کرد میں لفی الرفان المرز مربور تی جرا نے فی مَكْنَ جَسَ رَجُم مَانَ عَلَى مَنْ الْمَنْ فَاسْتُ وَرُوْنَ مَا الْمَنْ الْمُعْلَى وَرُوْنَ مَا الْمَنْ فرج مراج . اگرانی فرخی فرد کمچ رقع دیا طابع موں نو در اد س نے نعب ار فان کو کی کر سر ای کی توں می اس کا اس م بر حیات از مال کوکی متح میں دیا ہے ، میں سالیان Thin XX and Might Us in The mind - 10- 0- 2 Tak rik - 10- and - in / X x No ser guested. Julio 1 Ap/ To Talai

I por in 2 1023 publicities (if the at the the the court - - روا مر المحالي المراجع المراجع المحالي المحالي المحالي المحالي المحالي المحالي المحالي المحالي المحالي الم bound and all in the populate ipplication of - Staller 20 1000 terit - walnot - bo an to change at a Equinine to porticit مر کو شاما میں بورے - ارسان مرزم ک Dam el ple fill die AA - Clerice 1023 in the Siz-bourgessoof de di - 1/1/11 $\frac{2}{2} \frac{\partial \rho}{\partial r} \frac{\partial \rho}{\partial$ Files Ted: Chevr 1 al deally 1023 juliphe DSP/ToTalai

The de le 374 vertier ville Proto Clar it infortació 1920 - 2 - 10 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 - 2 13 2 hp Bis i chind 2 for ent 2 Cuple 2 il for the Darell in the state of the state Torie de la filme ? part - 12 ya 201- 5 11 21 per it it is port of 2-7,10,35, i dir fit -110 ber Bore 6 per 44 Bulles in Soof the an income on " entry 3/ pictor 2 bipler und an - 10 Wested' Aniel Hallin Mar Dep/Totalai in 374 in 211

US . Frank حان من محرف فرفن فارون لوس من ولوج بران فرد عرب م مي فركوره من منكي ويكر وجول كل مع . لفي الرقان مركورة ف ي مى شم ه تر م حطالمم الله من م بى اور شا حين تا الرعان لوى فم کار فم دی ہے. یہ میں ایکان دی کر در ا 21/2 1 م - قرامن مخ ب البزام بلمه 033. 03439115634 5 $\frac{e_{1}}{2} \frac{e_{2}}{2} \frac{e_{2}}{2} \frac{e_{2}}{2} \frac{e_{1}}{2} \frac{e_{2}}{2} \frac{e_{2}}{2} \frac{e_{2}}{2} \frac{e_{2}}{2} \frac{e_{1}}{2} \frac{e_{2}}{2} \frac{e_$ مر عرب عرب عالم فلط فر ع. مس مرتور في المان 2/1c سوکی قم کا رقم کی دی کے ۍ کړ کل سال Attested. 90 al well 2. Surge TiAn Deptrolator 10,000 - 409 (13,1) 400 Fr 1,100

مان آذان نتارس من To من برغب ساب لوندر بان تكام ما شطك و فرن او مر ما تعنيات سول امر ماكى دور فرانام رسرا بالم وسرا بالم وسرا المن جل الم الم الم الم الم الم سرا از سواطی دیونی ما دو عنام معدری تردی در والی علی ج تم جوزى ? د ٥ مر ٢ ك دْن حَلَّا في ٢ ما سَدْ ٢ ما دُونو في قسم مرج ہے ہم معشین کے حطابق کو خود خلابی تما سوا خوں ، موت میں لوص موں مصرفون علم میں ہے کی شریف یا روان کے استام میں مرج سے با کی لیے تم جو کی ہے ، اور نہ میں ایک ا مونی رقم رہ جا ۔ ارز نا میں نے کی سے وطالبہ کی ہے ۔ بر در ایک نے DEP To Talai al più de cio M Ato じらう あ しっとう المح - كمشن جب تشب رت وتعارب كما تق ٢ 03339700787 مر - جر رس در این میں این موان محصری آدہ صح بے شام کر مرجود تھا 5 0 6 500 po 500 10 0 0 0 0 2 2 2 5 1 W - : + ملا ت - كما انيار و شريف ارزن مرعل خان ، ي م في الم من وى ك لف الره - تربع شريف ارتباران س شريف ارزن مع شريك ا منتاج م فر ج رس م م م م دري . خواب: - جمان المج الممان من في اطلاح المي وى الدومان في العدار في كورس ب كونى بات فى يا 50 w 500 300 200 200 4 indivise governing to the TO. W. 444 حراب ٢- معما . جي من . همر - رودرو کي نے رکبي رقم من دی سن N' Unitore in The Will

(48) in the dist To assign wildle BISTO com al infiniture will Un up 110 110 130 210 - 20 7 - 20 10 - 100 cipe to C-II ien we Elo 313 HOL proce 21 logi C. es Ellipelin UPCU alle some courter infield all and the site of the 2 ju por prisidente la file in the second and a second and a second 2 vip and - 16 appier Lind Asi dielet and in 1/4 - Ener - When the decision of the interior ATTESTed · Un up when the Bran Sport he all all for ipilization in seconde in instant DSP/toTalai CAS SH BE C SIL XX Shuada is in to police of the and the and the and 2 bour in the contract of the second Along do

a ta a cana a canada a sa cada a cana a cana a canada conserva cana a cana a canada manda manda ya sa cana cana

103/2 200 To in in UST it. مان مان من جن واردن لو مر من لفيه - مول - عمر على مان من من من الرحان ما اور من المكار من مرتب مردن ما مرام هم زن کی دیاند کی - اور نہ س مسان ک مورس کارے رقم دی جا میں سان میں درستا ہے NASIMI . C' Co CMIS . M. حبيب الله 21 مرتيس واردن لولا 03449610443 مورب بر جی میں بر جے اس مارے کی علی کی سے ارز م ریکورهم دی . سرمات عسلط سی ۱ ATTested all falls 152 wine To DSP/Totala

(49) مان زان فر قرار مت متف شوار دن السر HZ -سان ملك مسار من خران لوم مس مساح مول. مرز في المان مرز في 300 سرایا رود سواری دیون سر دو بود کار مشن جیس کے حول ت لي المان برازه تمر فر 16 مار مان متار مار الفي المون مرجو تعل المسالر حان مع جمل وجون كرا حفول في ما مرمي فأردن مح امتال مرض فرج سول من وحوت في الما محوت فور ما جنارهم دي آلي سون ، د مرو . مين مرا . مر ب مر ما را مري وما ما موجود نتار. مرتا بن ما بم مساب كي مراج المج دوني. این کر سے معلوم شی ہے کے نظار ، 70 نے لیے الوان کو افری بالمي - ين سرا جان مي ، مرسع ب (min si Levie B mie A به وزم في ف الترام عليم in die 03459288592 = Maguipport is To tit. A SE USEN CUISOD 3 Alith We DSP/Tolalai To mis & port

My den in To He decision isi ile مان ما من شرغت واردن موسر عن در ای مرادی م مر تعبان ت دوران نفسه ارمان یا دیگر می دمکور ود مره از موب شین ورون ا مشارع ا م می می وجوانی د ما ند میں ی ج اور نہ یہ میں کی کور سال کے رحم دی ۔ e const. e julio se ann vijo ve To Videno H vojo ci whe privilling in the 03419064061 \dot{b} \dot{c} \dot{c} attested idei de Tolar Star the all the DSP/ToTalai

بان تزن شام مرجع مرجع مرجن المردن المرمز إخال جو شاده مان كما . كم مي مرتقب وارون برمير مي م الفياح عا- اور مرميك من عيد مارد ون ويون مرافع م من مر دى ب مر مير المعياد كار دون ن مر الم الم المي رو منع الم الم المي المع الم الم المع المع الم المع الم كى اطلاح دى بع اور نرس مين ن لفي الرمان كو شريع المكاران مع مرضم عمر رف كم مراسط كم من ارر الم في صبب فو فرد في مسامی شریعت المیار ن لفت الرحان کور قم دی سے۔ مر العلم مول من مر سان من مر مان م , A III یک داده ۲۵ مفروردن ۲۲ فال جوي من وه mob=03449625545. ++ ` ` راس ف من المرام علي الملا- مما اب في محمد ومعن المكاران م رقم مي ون ل اطالع المدى ؟ حرب: ح سن مين ف المج وما ما ب لين وقر ك المفا كرت الملاج في ال بلا ، مماری مرضود می میں علاماری نے جب و میں وردی اسلام کے مارے 9 4 60 an que 500 300 200 حواب :- جى نىي . جەرى يا بىكى خام تى بى ، اور نى خىر بوردى خى كى لى in i i han i and i and i and i an . Attested شایرزده ۲۰ وریاره DSP/To Talai

white the series of the series مان مان کم می شرخی و رون او سر حی و او ای ران مرد را مو معرف جراح در الحصر حجر من ويوري م الما درون معید مان نے سرام موں رطان دی کے سان از سوری کر ا أكراني فيك الريشين فاردن ماكث وجول (في مي لطان بازه مر فر <u>الم مرانی از معت الرحان می این جیرال کے م</u>مال مى - لغير المرحان مركور ف مح مثال م ترمع ورون اختلام منع من كم مري عاد الم من ي - الحل دن مر علم الحصر الحق ويوني في العان أرمع من مرسم مرسمة في أن الم رهم قرمن دررو . لعرضي ووت - حي مركز و لعد الدي ومركز م مع دركر مما تن سرفرض رفم ما ، مود محمد آزار ورزم - معی می مركوره نے وب رفت جو محجت افر عن ای وی اور ای وی ، او دا سی می مور میں فعلوم موار کم لفت الرجان نے مرض اکفا رے کی المرض میں مرس - / مع درو ی ... میں نی ایس ای مزیر مرد می می ا ب ورون محافظ و مون مون مون ما وی ملم قرق الما ورودی مع مرابع فر فر مرب ب Allested. -el.NS المان الم معمد وين ه رون الم all all for DSP/To Talai Mab = 034798633705

FINAL SHOW CAUSE NOTICE

I Sadiq Baloch District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Police Disciplinary Rules-1975, do hereby serve you, FC Naseeb ur Rahman of this District Police as follow:

Dated

(i) that consequent upon the completion of enquiry conducted against you by the enquiry officer for which you were given opportunity of hearing vide communication No. 57/Enq:, dated 02/10/2018:

(ii) On going through the finding and recommendation of the enquiry officer, the material available on record and other connected papers including your defense before the enquiry officer.

I am satisfied that you have committed the following acts/omissions specified in Rule-3 of Police Disciplinary Rules 1975.

You FC Naseeb ur Rahman while posted to Police Post Torwarsak, that you at the time of your posting in traffic police as TFC, you have collected amount from constables by pretending that huge sum of amount is surfed on opening of Traffic Warden System, therefore it is necessary to collect a combined fund. You have deceived the official and collected money from them.

As a result thereof, I Sadiq Baloch, District Police Officer, Buner as a competent authority, have tentatively decided to impose upon you one or more penalties including **Dismissal from Service** as specified in Rule-4 of the Ibid Rule.¹

You, are, thereof, required to show cause as to why the aforesaid penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this Notice is received within seven (07) days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

Sadig Baloch) District Police Officer, Buher 🗉 🚟

/Ena:

Copy to the:

1. SHO Daggar with the direction to serve the copy of this Show Cause Notice upon FC Naseeb ur Rahman, through DFC or Constable and copy thereof may be sent to this Office.

1.

2.

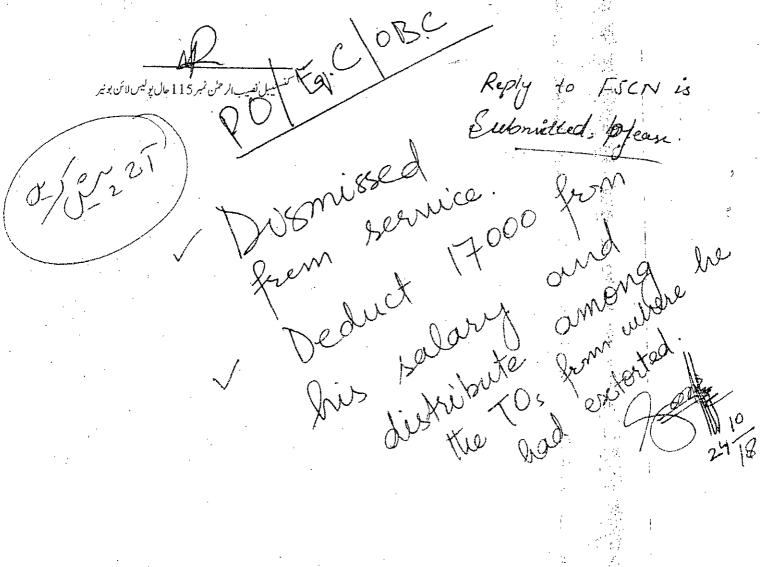
3.

4.

يب الرحمٰن نمبر 115 حال پوليس لائن بونير

جناب عالي!

افسران بالاصاحبان کو حلفاً آفرار کرتا ہوں کہ میں نے انچار جنریف کے کہنے پر مذکورہ بالار قم مبودگی TO شاراتھٹی کی ہے ،میری اتن جراب اور او قات نہیں ہے کہ میں وارڈن اہلکاران سے رقم اکھٹی کر سکوں اگر میں نے اپنے طرف سے رقم اکھٹی کی ہوتی توانچارج ٹریفک بر دقت میرے خلاف با قاعد ہر پورٹ لکھتا یاکار دانی کرتا میں نے صرف علم کی تعییب کی ہے .مزید سے کہ میرے چھوٹے چھوٹے بیج میں اور نہایت غریب گھرانے سے تعلق رکھتا ہوں افسران بالاسے رحم کی اپیل کرتا ہوں اور شوکاز نوٹس بلاکسی کار دانی فاکس کی التجاء کرتا ہوں .



<u>ORDER</u>

This order will dispose of departmental enquiry initiated agains FC Nasibur Rahman No.115 of this district police vide this office No. 57/Enquiry, dated 02/10/2018.

Brief Facts:

Fc Nasibur Rahman No.115 of this district police while posted at PP Torwarsak PS Daggar district Buner, while his posting in Traffic Police as a TFC he had collected amount from constable by pretending that huge sum of amount is served on opening on Traffic Warden System, therefore, it is necessary to collect a combined fund. He has deceived the officials and collected money from them. He was proceed departmentally and served with charge sheet and statement of allegations under Police Disciplinary Rules-Mr. Muhammad Naeem Khan SDPO Totalai was appointed 1975. as enquiry officer. The Enquiry Officer has recommended the official concerned for punishment. Subsequently, he was called to OR on 15/10/2018 for personal hearing but he could not produce any solid reason. for the satisfaction of the undersigned. Resultantly, final show cause notice was serviced upon the concerned defaulter vide Enquiry No.5926/Eng, dated 17/10/2018. The reply to the final show cause notice was not satisfactory so the undersigned heard him in person, but he could not produced any substantial documents in his defense.

Therefore, <u>I Sadiq Baloch District Police Officer Buner</u> as Competent Authority and in exercise of the power vested in me under Police Disciplinary Rules-1975, award major punishment of dismissal to constable Nasibur Rahman No. 115 and deduct 17000 from his salary and distribute amongst the TOs from where he had extorted.

Order announced.

DISTRICT POLICE OFFICER, BUNER

OB No. 1.56

Dated: 24 / 7 / 2018No! 6281 / Eng,

/Eng, dated Daggar the Copy to all concerned.

24 /10/2018.



REGIONAL POLICE OFFICER, MALAKAND AT SAIDU SHARIF SWAT. <u>Ph: 0946-9240381-83 & Fax No. 0946-9240390</u> Email: digmalakand@yahao.com

OFFICE OF THE

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ORDER:

Buner District for re-instatement in service.

Brief facts of the case are that the above named Ex-Constable was enlisted on 21/05/1998 and having 20 years, 06 months and 19 days of service. There are 12 good entries and 05 bad entries in his service record. The appellant was dismissed from service due to allegations that at the time of his posting as DFC he has collected money from Constables by pretending that huge sum of money is surfed on opening of Traffic Warden System, so it is necessary to collect a combined fund. He has deceived the officials and collected money from them. Consequently he was proceeded departmentally and served with charge sheet and statement of allegations under Police Disciplinary Rules-1975 and Muhanmad Naeem Khan SDPO Totalai was appointed as enquiry officer, the enquiry officer recommended the defaulter concerned for punishment. Subsequently he was called in Orderly Room on 15/10/2018 by the then DPO Buner for personal hearing but he could not produce any cogent reason for the satisfaction of the then District Police Officer, Buner. Resultantly a final show cause notice was served upon the delinqueat Constable and he was provided another opportunity of personal hearing but he could not produce substantial documents in his defense. In light of above the District Police Officer, Buner avarded him major punishment of dismissal from Service along with deduction of Rs: 17000 from his salary for distribution amongst the TOs from where had extorted vide his office OB No. 156 dated 24/10/2018.

He was called in Orderly Room on 14/11/2018 and heard him in person. The appellant pleaded that he has collected money on the directions of Traffic Incharge. Therefore, a denovo enquiry was ordered into the matter and Addl: SP Swab was appointed as Enquiry Officer. The Enquiry Officer recorded statement of the delinquent Ex-Constable Nasceb Ur Rahman No. 115 wherein he stated that he has collected Rs: 500/500 per head from 34 Traffic personnel for the purpose of signboards etc and paid Rs: 17000/- to ASI Muhammad Ali, Incharge Traffic District Buner in presence of Constable Ismail No. 512/SPF and Irfan Ullah No. 522 of Traffic Staff Buner. Statement of both the Constables were recorded wherein they stated their unawareness about payment of money to ASI Muhammad Ali, Incharge Traffic Buner. Hence the Enquiry Officer held him guilty for the Charges levelled against him. Therefore,

his appeal for reinstatement in service is hereby filed. ġ, Order announced 'H C DPO Buch 11914 No.

72018.

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Dated

Mankand, at Sandu Sharif Swat

Copy to District Police Officer, Buner with the direction/conduct denovo enquiry Eagainst ASI Muhammad Ali, Incharge Traffic Buner into the matter and submit his report within a week time positively. This is with reference to Var office Memo: No. 6587/Enquiry, dated 05/14/2018. Service Roll, Fauji Missal and complete enquiry file of Ex-Constable Naseeb Ur Rahman No. 115 are returned herewith for record in your office.