# BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 16434/2020

Date of Institution

... 11.12.2020

Date of Decision

... 17.09.2021

Rehmat Ullah Khan S/O Abdul Ghaffar, R/o Adam Zai, Lakki Marwat, Ex-SI/SHO, Police Station Domel, Bannu.

... (Appellant)

# **VERSUS**

District Police Officer, Bannu and two others.

(Respondents)

Mr. ARBAB SAIF-UL-KAMAL,

Advocate

For appellant.

MR. KABIRULLAH KHATTAK, Additional Advocate General

For respondents.

MR. SALAH-UD-DIN

MEMBER (JUDICIAL)

MR. ATIQ-UR-REHMAN WAZIR

MEMBER (EXECUTIVE)

# JUDGMENT:

# SALAH-UD-DIN, MEMBER:-



Precise facts forming the background of the instant service appeal are that the appellant while serving as SHO Police Station Domel District Bannu was departmentally proceeded against on the allegations that he was having weak command in area of his responsibility, showing laxity and inefficiency in his official work and was also having relations with drug peddlers as well as proclaimed offenders. On conclusion of the inquiry, the appellant was awarded major penalty of dismissal from service with immediate effect. The departmental appeal

mercy/revision petition of the appellant were also declined, hence the instant service appeal.

- 2. Notice was issued to the respondents, who submitted their comments, wherein they refuted the contentions of the appellant.
- 3. Learned counsel for the appellant has contended that neither any documentary evidence was produced during the inquiry against the appellant nor statement of a single witness was recorded in support of the charges leveled against the appellant; that no material whatsoever was put to the appellant during the inquiry and the inquiry officer has also conceded in his report that none came forward for recording evidence in support of allegations leveled against the appellant; that the alleged secret information about his links with drug peddlers cannot be considered a legal ground for imposition of penalty upon the appellant in absence of any oral or documentary evidence in this regard; that the appellant is quite innocent and was victimized by the respondent No. 1 for ulterior motive; that the impugned orders are wrong and illegal, therefore, the same may be setaside and the appellant may be reinstated in service with all back benefits. Reliance was placed on 2008 SCMR 1369 and 1997 SCMR 1073.
- 4. On the other hand, learned Additional Advocate General for the respondents has contended that the appellant was carrying bad reputation and was having links with drug peddlers as well as proclaimed offenders, which facts were duly proved during the inquiry; that a regular inquiry was conducted against the appellant by adopting all legal as well as codal formalities and the appellant was afforded opportunity of personal hearing; that the charges against the appellant stood proved during proper inquiry, therefore, the impugned orders may be kept intact and the appeal in hand may be dismissed with costs.
- 5. We have heard the arguments of learned counsel for the parties and have perused the record.
- 6. A perusal of the record would show that the appellant while serving as SHO Police Station Domel Bannu was, proceeded



against departmentally on the allegations that his command was weak and he showed laxity and inefficiency in official work and had developed relations with drug peddlers and proclaimed offenders. DSP Headquarter was appointed as inquiry officer for conducting inquiry into the matter. In view of charges of such heinous nature as leveled against the appellant, the respondents were required to have produced certain oral or documentary evidence in support of the same, however the inquiry report would show that the inquiry officer has categorically mentioned therein that none had come forward to record statement in support of the charges leveled against the appellant. Although no evidence whatsoever was brought on record during the inquiry but even then the inquiry officer came to the conclusion that the charges leveled against the appellant were proved by placing reliance merely on alleged secret information about links of the appellant with drug peddlers, without putting the same to the appellant during the inquiry proceedings. The allegations regarding weak command of the appellant in the area of his responsibility as well as inefficiency were also leveled against the appellant but even in this regard, nothing in black and white was produced during the inquiry. The competent Authority has also not applied conscious mind in the matter and awarded major punishment of dismissal from service to the appellant by simply relying on the baseless recommendations of the inquiry officer. The impugned orders are thus not sustainable in the eye of law and are liable to be set-aside.

7. In view of the above discussion, the appeal in hand is allowed by setting-aside the impugned orders and the appellant is reinstated in service with all back benefits. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 17.09.2021

(SALAH-UD-DIN) MEMBER (JUDICIAL)

(ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE)

ORDER 17.09.2021

Appellant alongwith his counsel Mr. Arbab Saif-ul-Kamal, Advocate, present. Mr. Kabirullah Khattak, Additional 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 allowed by setting-aside the impugned orders and the appellant is reinstated in service with all back benefits. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 17.09.2021

ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE)

(SALAH-UD-DIN) MEMBER (JUDICIAL) 25.03.2021

Appellant present through counsel. Preliminary arguments \*\square\* heard. Record perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to the respondents. To come up for written reply/comments on  $\frac{27}{5}$  /2021 before S.B.

(Rozina Rehman) Member (J)

27.05.2021

Stipulated time Ras Passed and reply flow not been submitted. Junior to counsel for the appellant and Mr. Javaidullah, Asstt. AG for the respondents present.

Respondents have not furnished Reply/comments. Learned AAG is required to contact the respondents for submission of written reply/comments in office within 10 days, positively. If the written reply/ comments are not submitted within the stipulated time, the office is required to submit the file with a report of non-compliance. File to come up for arguments on 17.09.2021 before the D.B.

Chairman

P.S

09.06.2021

Learned Addl. A.G be reminded about the omission and for submission of reply within extended time of 10 days.

Chairman

# Form- A

# FORM OF ORDER SHEET

Court of			
	111		
e No	16434	/202 <b>D</b> .	

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/12/2020	The appeal of Mr. Rehmatuliah resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
		REGISTRAR,
-		This case is entrusted to S. Bench for preliminary hearing to be put up there on $\frac{(5/62/2)}{}$
		CHAIRMAN
15.0	2.2021	The learned Member Judicial Mr. Muhammad Jamal Khar
		der transfer, therefore, the case is adjourned. To come up
		same before S.B on 25.03.2021.
		9
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The appeal of Mr. Rehmatullah Khan son of Abdul Ghaffar Ex-SI SHO Police Station Domel Bannu received today i.e. on 14-12.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Memorandum of appeal may be got singed by the appellant.
- 3- Annexure-A of the appeal illegible which may be replaced by legible/better one.
- 4- Annexures of the appeal may be attested.
- 5- Annexures of the appeal may be flagged.
- 6- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 4055 /S.T. Dt. 15/12/2020

> SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Saadullah Khan Marwat Adv. Pesh.

Sir, Re-sombmilled after its completin pl.



# <u>HE KPK SERVICE TRIBUNAL PESHAWAR</u>

S.A. No. \_\_\_\_\_/2020

Rahmat Ullah Khan

versus

DPO & Others

# INDEX

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal	-	1-4
2.	Charge Sheet 21-07-2020	"A"	5-6
3.	Reply to Charge Sheet	"B"	7-8
4.	Enquiry Report dated 13-08-2020	"C"	9-11
5.	Dismissal from service dated 17-08-2020	"D"	12
6.	Representation dated 19-08-2020	"E"	13-14
7.	Rejection of appeal dated 10-09- 2020	"F"	15
8.	Mercy petition 01-10-2020	"G"	16-17
9.	Performance and FIRs	"H"	18-34
10.	Commendation Certificate	"I"	35-5 <b>1</b>

μ

Through

Appellant

Saadullah Khan Marwat

Advocate

21-A, Nasir Mansion, Shoba Bazaar, Peshawar

Ph: 0300-5872676

Dated: 11-12-2020

# **BEFORE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. 16434 /2020

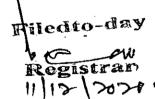
Rehmat Ullah Khan S/O Abdul Ghaffar,	<b>.</b>	Khyber Pakhtukhwa Service Tribunal
R/o Adam Zai, Lakki Marwat,	ı	Diary No. 16426
EX-SI/SHO, Police Station Domel		Dated 11 12 2020
Bannu		Δnnellant

#### **Versus**

- District Police Officer,
   Bannu.
- Regional Police Officer,Bannu Region Bannu.

⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST OB NO. 1096, DATED 13/17-08-2020
OF R. NO. 01, WHEREBY APPELLANT WAS
DISMISSED FROM SERVICE OR OFFICE ORDER
NO. 308/EC DATED 10-09-2020 OF R.NO. 02
WHEREBY REPRESENTATION OF APPELLANT
WAS FILED FOR NO LEGAL REASON:



⇔<=>⇔<=>⇔<=>⇔

# Respectfully Sheweth;

and filed.

Rogistrar W

That on 01-04-1990, appellant was appointed as Constable and in the year 2009, he was promoted to the rank of Assistant Sub Inspector. Further in the year 2018, he was on brilliant performances of his official duties promoted to the rank of Sub Inspector.

- 2. That at the time, appellant was posted as SHO Police Station Domel Bannu when on 21-07-2020, he was served with Charge Sheet / Statement of Allegation to the effect:
  - i. That you SI Rehmat Ullah while posted as SHO, Police Station Domel has weak command in your area of responsibility, showed laxity and inefficiency in official work and cultivated relations with Drug Peddlers and Proclaim Offenders. (Copy as annex "A")
- That the said Charge Sheet was replied by denying the allegations.
   (Copy as annex "B")
- 4. That enquiry into the matter was initiated but the same was not conducted as per the mandate of law and on 13-08-2020 Inquiry Officer submitted enquiry report before R. No. 01 stating therein that none was ready to give written statement regarding involvement of appellant with peddlers / proclaim offenders, however, as per secret information he was involved in the said offences, so the charges leveled against him were proved. (Copy as annex "C")
- 5. That on 13/17-08-2020, R. No. 01 awarded appellant with major punishment of dismissal from service with immediate effect. (Copy as annex "D")
- 6. That on 19-08-2020, appellant submitted representation before R. No. 02 for reinstatement in service which was rejected on 10-09-2020. No copy of the order dated 10-09-2020 was endorsed or served upon appellant. (Copies as annex "E" & "F")
- 7. That 01-10-2020, appellant submitted Mercy Petition / Revision Petition before R. No. 03, yet without response till date. (Copy as annex "G")
- 8. That in the Charge Sheet allegation of weak command and inefficiency was attributed to appellant but the performance during the period in Police Station Domel is evident from dozens of FIRs registered on various dates. (Copies as annex "H")

 That in pursuance of standard performance, efficiency, appellant was awarded with dozens of Commendation Certificates by the respondents. (Copies as annex "I)

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

# GROUNDS

- a. That in the Charge Sheet general allegation were leveled but no cogent and concrete allegation was ever made against appellant.
- b. That in the reply to Charge Sheet as well as in the departmental appeal, such allegations were negated by the appellant with solid proof.
- c. That the Inquiry Officer failed to bring any documentary or oral proof on record against the appellant.
- d. That secrete enquiry or hearsay evidence is not admissible in law / rules, while appellant was awarded with major punishment of dismissal from service.
- e. That respondents never scrutinized service record of appellant but relied upon the recommendation of enquiry officer which were without any proof.
- f. That neither appellant was served with Final Show Cause Notice nor was afforded opportunity of personal hearing, being mandatory in law, but with closed eyes and personal grudges, the said unjustified punishment was awarded to him.
- g. That recording of dozens of FIRs and awarding of dozens of Commendation Certificates speaks the truth that appellant has neither any weak command over the area nor showed any laxity or inefficiency of his official work.
- h. That the main reason of the subject matter was that appellant has impounded of new brand vehicle which was demanded by R. No. 01 for personal use yet his request was not acceded to, being case property, so such drama was staged by him which was resulted into dismissal of appellant from service.

That neither original nor appellate order of the respondents is per the mandate of law, so the same are base on malafide as no statement of anyone was recorded nor appellant was afforded opportunity of cross examination nor any enquiry was conducted as per the mandate of law, so the impugned orders are not only illegal but ab-initio-void.

It is, therefore, most humbly prayed that on acceptance of the appeal, orders dated 13/17-08-2020 and 10-09-2020 of the respondents be set aside and appellant be reinstated in service with all consequential benefits.

**Appellant** 

Γhrough

Saadullah Khan Marwat

Tablica Miss Pubina Naz

Advocates

Dated: 10-12-2020

Arbab Saiful Kamal

Amjad Nawaz

# **CHARGE SHEET:**

- I, WASIM RIAZ, District Police Officer, Bannu, as competent authority, hereby charge you, SI Rahmat Ullah (Suspended) for the purpose of departmental enquiry proceedings as fellows:-
  - > That you SI Rahmat Ullah while posted as SHO of the Police Station Domel has weak command in your area of responsibility, showed laxity and inefficiency in official work and cultivated relations with drug peddlers and POs.
  - Such act on your part is against service discipline and amounts to gross misconduct.
- 1. By reason of the above you appear to be guilty of misconduct under the Police Rules 1975 (As amended) vide Khyber Pakhtunkhwa gazette Notification, No. 27<sup>th</sup> of August 2014) and have rendered yourself liable to all or any of the penalties of this Charge Sheet to the enquiry officer.
- 2. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.
- 3. Your written defense, if any, should reach to the Enquiry Officer within the specified period, falling which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
- 4. You are directed to intimate whether you desire to be heard in person.
- 5. A statement of allegation is enclosed.

(WASIM RIAZ) PSP T POLICE OFFICER,

Je Jer in 7/2 - 2 Cord Jest 5d/- 7-20 41 W/1-77 28-7-20

# SUMMARY OF ALLEGATIONS:

I, WASIM RIAZ, District Police Officer, Bannu, as competent authority, am of the opinion that SI Rahmat Ullah (Suspended), has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Police Rules (As amended) vide Khyber Pakhtunkhwa gazette Notification, No. 27<sup>th</sup> of August 2014).

# **SUMMARY OF ALLEGATIONS:**

- That SI Rahmat Ullah while posted as SHO of the Police Station Domel has weak command in his area of responsibility, showed laxity and inefficiency in official work and cultivated relations with drug peddlers and POs.
- > Such act on his part is against service discipline and amounts to gross misconduct.
- 1. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations **DSP HO** is appointed as Enquiry Officer.
- 2. That Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within the targeted days after the receipt of this order.
- 3. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.

Sd/-

(WASIM RIAZ) PSP
DISTRICT POLICE OFFICER,
BANNU

No. 554-55/SRC dated 21-07-2020 Copies to:-

- 1. The Enquiry Officer.
- 2. The Accused Officer/Official.

Attesto

بحواله مشموله عارج شیٹ نمبر 554-55/SRC مورخه 1.07.2020 هجود یه جناب PO صاحب بنوں کے ممن میں مود باند معروض ہوں کہ من SHO نے کھی کارسر کاریش کوتا بی نہیں کی ہے بلکہ بمیشہ کارسر کاریش کوتا بی نہیں کی ہے بلکہ بمیشہ کارسر کاریش کوتا بی نہیں کی ہے بلکہ بمیشہ کارسر کاریش کوتا بی نہیں اور کھی بھی آفسران الاکوشکایت کا موقعہ نہیں دیا ہے جارت شیٹ میں ذیل الزمات میں میں من SHO کو جارج کیا ہے۔

1- کہ میں بخشش SHO تھا نہ ڈومیل علاقہ میں میری کمانڈ کنرور رہی ہے۔ جوسر کاری فرائیف کی انجام ویکی لیک مستی اور غیرمستعدی سے کالیا گیا ہے اور میں نے علاقہ ڈوکیل میں منشیات فروش ممکر اور بحر مان اشتہاری کے ساتھ تعلقات بناد کھے تھے۔

إس ضمن ميں ذيل معروضات پيش كرتا ہوں -

(i) میں تھانہ ڈومیل ہیں مورخہ 20.02.2020 سے 20.07.2020 کے SHO انعینات ریا ہوں۔ عرصہ تعیناتی کے دوران میں نے تھانہ ڈومیل میں 30 مجرمان اشتہاری گرنتار کئے ہیں اِن میں سنگین مقد مات کے اکثر POs ہیں۔ اسطرح میری پوسینگ کے دوران من SHO نے کائی نشیات / جری تقریباً POs ہیں۔ اسطرح میری پوسینگ کے دوران من SHO نے کائی نشیات / جری تقریباً ہم ہوئی ہیں آئی برآ مدکی ہے۔ جن میں چھ SCNCAID FIR کے ہیں یسمنی جو اسلحہ اور ایسونیشن اور منشیات پرآ مدموئی ہیں آئی تفصیلی فہرست ہمراہ لف ہیں۔

2۔ من SHO کی علاقہ میں مشیات فرق میا مجرم اشتہاری ہے علق نہیں رہا ہے بیدالزام نجھ پر بے بنیادے اور سُنی سُنا کی شہادت پر بنی ہے۔موجودہ DPO صاحب کی پوسٹینگ کے دوران من SHO خطرناک قل کے بجر م اشتہاری مسلح محرفقار کئے ہیں۔

FIR(i) كى نقول مقدمہ 393 مورخہ 08.07.2020 جرم . 15AA/I/CNSA

FIR(ii) مقدمہ 414 مورخہ 47.07.2020 تھانہ ڈومیل بطور بڑوت ہمراہ لف ہے۔ اسطرح میں نے بحوالہ مقدہ، 408 مورخہ 13.07.2020 تھانہ ذوہ بل ۔ اسطرح میں نے بحوالہ مقدہ، 408 مورخہ 13.07.2020 تھانہ ذوہ بل درج رجم ہے اس مقدمہ میں میں نے 2 رئیٹر آور 2 بارہ نے مربندوق مراکد کئے میں سے کا روائی بھی موجودہ DPO میاحب کی پوسٹیک میں مورد ہیں۔

sutt.

3۔ میں ذاتی طور پر تھانہ ڈومیل میں نشات کے حلاف کافی مقدمات ورج رجشر کئے ہیں جن میں سے 16 ہم مقدمت زیردنعہ 9 C N C A / D ورج رجشر کئے ہیں \_نقول FIR مقدمت زیردنعہ 26 کا 20 ورج رجشر کئے ہیں ۔نقول بیل جس میں مجموعی طور پو برآمد گ (۱) 153 (153 (153 (153 (153 رام چیس پر آمد ہوئی ہیں۔

میری تعیناتی بطورِ SHO ذومیس میں **عوام ال**ناس کی طرف سے کوئی شکایت بابت کر پیٹین وغیرہ نہیں ہوئی ہیں ۔ اور موجودہ جارج شین کے علاوہ اس سے پہلے نہ کوئی جارج شیٹ ملا ہے اور نہ کوئی شوکا زنونس جاری ہوا ہے۔

4۔ تق ند و دمیل ہے تیں میں SHO تھا نہ ہوید ، تھا نہ منڈ ان ، تھا نہ فور یوالہ ، تھا نہ ٹی میں بطور SHO کا میاب پیرو گزارے ہیں اور سالانہ اچھی رپورٹ ملی ہیں 2018,19,20ء میں مجھے اچھی کاروائی پر حاص کر POs/منشیات کمین وغیر و میں مجموعی طور پر 14 انعائی سرمیفیکٹ بمعدانعا مات جناب سابقہ DPO یاسرآ فریدن ساحب کی صرف سے ہیں۔ علاوہ از میں اان میں 2 سرمیفیکٹ کا س ال ہیں۔ سرمیفیکٹ کی نقول ہمراہ لف کی جاتی ہیں۔

میں سال <u>2009ء میں بطور</u> ASI پروموٹ ہوا ہوں سال <u>2018ء میں سب انسکٹر پروموٹ ہوا</u> ہوں۔سب انسپٹرعبدے پرترتی ہونے کے بعد آج تک تمام پیریڈ میں مسلسل SHO دہ پیکا ہوں۔ تُجھے SHO پیر پیری تعیناتی کے دوران کو فَاسرزانبیں ٹی بیر میرانمل نا مدساف ہے۔

5۔ پی بے تھ ند ذومیل میں اپنے فرائض دیا نتداری جان فشانی آور دلیری کے ساتھ سرانجام دی ہیں۔ آور اپنے میں ہے۔ آفر اپنے میں ہے۔ آفر اپنے میں ہے۔ آفر اپنے میں ہے۔ آفر اپنی ہونا چا ہتا ہوں۔ میں ہو تھے ہتا ہوں۔ میں ہو تھے ہتا ہوں۔ میں ہو تھے ہتا ہوں۔ میں ہوتا چا ہتا ہوں۔ میں ہوتا چا ہتا ہوں۔ میں ہوتا چا ہتا ہوں۔ میں ہوتا ہوں ہے۔ میرا چا می شیٹ داحل دنتر فرمایا جائے آور مجھے سروس پر بحال کیا جائے تا حیات دے گور ہونگا۔ میرا چا میں شیٹ داحل دنتر فرمایا جائے آور مجھے سروس پر بحال کیا جائے تا حیات دے گور ہونگا۔

راكل: - رحمت الله خان سب السيكتر بوليس لائن -

Aleto.



# OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE Head Quarter, BANNU

No. 566 / HQ Dated 13/8 /2020

Phone No. 0928-9270078

بخادمت جناب وسركت يوليس فيسربول

عنوان: - انكوائرى برخلاف الأرحت اللدسُ ايق BHB تفات في ميل :

جناب عالى!

. . . . بحواله مشموله چارج شین نمبر 55/\$2 فروخه 2020- 7-21 مجاریه جنابOPO صاحب معروض بوں که SI رصت الله سااہت SI+O قعانیهٔ ومیل کودیکن الزامات کی روثن میں جارتی شینت ایشو ہو چکاہیں۔

# Summary of Allegations:

- 1. That You SI Rahmat ullah while Posted as SHO of the PS Domel has weak command in your area of responsibility, showed laxity and inefficiency in official work and cultivated relations with drug pedddlers and POs.
- 2. Such act on your part is against sevice disciplaine and amount to gross misconduct.

  الزام مليم في على المراح شيث من كر من المسالكة المراح كيا كيا سي كم كيا كيا كيا كيا كيا كر كن SHO تحالة وميل مين ميرى كما نذكر دروى مع مع جور كارى فرائض كي النوام على المراح المرا

اس من من من ويل معروضات بيش كرتا موك

1- بین تھان ذوسیل میں مورجہ 2020ء 2 - 2020 ہے۔ 2020 کے SHO تعینات رہا ہوں عرصہ تعیناتی کے دوران میں نے تھا ندو دیسیل میں ہے۔ 10 کی SHO تعینات رہا ہوں عرصہ تعیناتی کے دوران میں نے تھا ندو دیسیل میں 30 ہجر مان اشتہاری گرفتار کے ہیں۔ ان میں سکیلین مقد مات کے اکثر POs ہیں۔ اس طرح میر پوسٹینگ کے دوران من SHO نے کا کن میں 30 ہجر مان استہاری گرفتار کے ہیں۔ اس اللہ اللہ اللہ میں اور منشیات پر میں تھے۔ اس اللہ مونی ہیں۔ اس تعمیرا دلف ہیں۔ اس تعمیرا دلف ہیں۔ اس تعمیرا دلف ہیں۔

2 من SHO کی ملاقہ میں کسی منشات فروش یا بجرم انتشاری ہے جاتی نہیں رہا ہے۔ بیالزام مجھپ بے بنیاد ہے۔ اور نی سائی شہادت پر تن ہے۔ میوجود ہ DPO ساحب کی پوششنگ کے داوران من SH و وقطرنا ک قتل سے مجرم اشتہاری سلح گرفتار کئے ہیں۔

الـ FIR كي لفقول بحواله مقدمه 393 موراته 2020 - 7-8.7م 15AA/I/CNSÀ

۔ الا FIR کی نقبل بحوالہ مقدمہ 414 مؤرخہ 2020-7-17 جزم 15AA تھانہ ڈوکسل بطور ثبوت ہمراہ لف ہے۔ ای طرح میں نے بحوالہ مقدمہ \*\* 408 سورخہ 2020-7-13 جرم PPC 212/15AA تھانہ ڈوکسل درج رہے۔ اس مقدمہ میں نے دوعد دیار بور بندوق براند کئے ہیں۔ \* یہ کاروالی نظی موجود ڈوDPO صاحب کی ہوسنے کہ میں گئے گئے گئے ہے۔

w Blicks

درس ورجنر كي بين فقول FIRs (i) FIRs (265 163 164 189 180 180 180 مراه لف بين جس مين مجوى طور ير براندكي ً 19kg/215gm گرام چرس برايد يوني بين.

مير كُنَّ تَقْعَنَا لِيَّا لِللوَّنِ ۚ كَالْمُ اللهِ مِن عَلِيمًا مَاللَّا مِن كَالْمُرْف سَه كُولَى شكايت بابت كريشن وغيره نهيں بولى ہيں۔اورموجود و چارج شيف َ علاوة اس سے پہنلے خاکو کی جارج شیٹ ملاہے "اورت کو کی شوکا زنوالی جاری ہوا ہے۔

﴾ کے تھاندہ وکیل نے تال میں SHO تھاندہوید، تھا نہ منڈ ان ، تھانہ غور یوالہ، تھانہ ٹی میں بطور SHO کا میاب بیرڈ گزارے ہیں ۔اور سالانہ اٹھی ر پورٹ کی بین ﴿ لَمَانَ 2019/2019/18/2019/2020 مِنْ اللَّهِ عَلَيْهِ اللَّهِ مِنْ كُولَ العال أَنْ اللَّهِ الل بر شیفکیش نمیعدانعانات جناب سابقند OP ما بر آفر نیدی شاخت کی طرف سے ملے ہیں۔علاوہ ازیں ان میں دوسٹوفکیٹ کلاس ۱۱ ہیں۔ شوفکیٹ 🕯 كونفول ممراه لف كي خاتي بن \_

میں سال 2009 میں بطور ا AS پر وموٹ ہوا ہوں بیٹال 18 20 میں سے انسکٹر پر وموٹ ہوا ہوں۔سب انسکٹر عہدے پر تی ہونے کے بعد آ تک تام پیرنید مان این SHOره چکا برون نے محص SHO پیرنیل تعلیاتی کے دوران کوئی سر آئیس ملی ہیں۔میرائل نا سرصاف ہے۔ 5۔ میں کئے تھا نیڈ ولیل میں اٹنے فراکفن دیا شقدادی جان فیٹانی اور دلیری کیسا تھ سرانجام دی ہیں ۔ اوراپنے ماتحت عملہ پرہمی مکمل کنٹرول رہاہے۔ علاوہ ازیں میں خود بھی جا ترعرض ومعروض کے لئے افسران بالا کو پیش ہونا جا ہما ہوں۔

اَ \$رحثُ اللهُ مورجِدِ 2020=00-19-19 مَا 2020 فِيرَ الْفُولَا 6 الْفُولَا 6 \$ الْفُولَا 6 \$ الْفُولَا 6 \$

منطاین رایکاردا کا بعت الله مورود 1990 ملے 1 کا مجرقی شدہ ہے۔ چھوٹی سزادہ ہے۔ 23, good entries ہیں۔ جبکہ بوی

، مزاکوگی نبین ہے۔ دیورٹ SRC لفٹ مذاہب

اکٹر المیان بنوں خفیدا نفار میش تو دیتے ہے گئی تجریری البال دیتے کے لئے تارنہیں ہوتے ہے۔ کیونکہ دشمنی پیدا ہونے کا اندیشہ وتا ہے۔ البية حدودتها ندؤوس شنخفيذة والغيب يبته براري كزينه بريايا عميا كالزام عليه الارحمت الله خان منشات فروشوں بے تعلقات وغيره ميں ماوث، ر باب مفارج شيك مين لكاست الزامات برخلان الكارضة الله قال خفيه والعصم معلومات كرف برنابت بوت مين

SONVICE.

Dismissal

Attets

ڈی ایس یی ہیڑکوارٹر بنوں

منزلع بنول

# فهرست ریکوری 20.02.2020 تا 20.07.2020 آزانِ رحمت الله خان SHO

تفانه وميل

	55/109	107/151	216	279	داؤمنی	POs	آکس	UŽ.	کارتو <i>س</i> ہر فتہ	پىتو <u>ل</u>	بندوق	راكفل	كلاكوف	كلاشنكوف	نام اسلحه وغيره
i	143	116	06	12	9500روپ	30	5 گرم	19kg/215gm	531	22	, d	01	01	03	تعداد

A Marks

# **ORDER**

This order of the undersigned is dispose of the departmental proceedings against accused SI Rehmat Ullah (Suspended) under Police Rule 1975 (As amended vide Govt: of Khyber Pakhtunkhwa Gazette Notification of even No: dated 27<sup>th</sup> of August 2014) by issuing charge sheet and statement of allegation to him for committing the following commissions/omissions:

- > That SI Rahmat Ullah while Posted as SHO of the Police Station Domel has weak command in his area of responsibility, showed
- laxity and inefficiency in official Work and cultivated relations with drug peddlers and POs.
- > Such act on your part is against service discipline and amounts to gross misconduct and inefficiency.

Charge sheet and statement of allegation were issued to him and DSP/HQ, Bannu was appointed as Enquiry Officer to scrutinize the conduct of the officer. The Enquiry Officer submitted finding report vide letter No. 566/HQ, dated 13.08.2020 and reported that in the light of the departmental enquiry proceedings, secret information the allegations against the said SI Rahmat Ullah have been proved.

Keeping in view the positioned explain above, Record perused, undersigned agree with the Findings of the Enquiry Officer. Hence, I, WASIM RIAZ, District Police Officer, Bannu, in exercise of the powers vested in me under Police Rule 1975 (As amended vide Govt: of Khyber Pakhtunkhwa Gazette Notification of even No: dated 27<sup>th</sup> of August 2014), hereby award him Major Punishment of "Dismissal from Service" with immediate effect.

OB No. 10.96

Dated: 13.08 /2020.

(WASIM RIAZ)PSP District Police Officer, Bannu

No. 10400-04/SRC dated Bannu, the 17/8 /2020.

Copy of above for necessary action to:

3. Reader, SRC, OHC, PO

paets

4. Fauji Misal Clerk along with enquiry file for placing it in the Fauji Missal of the concerned official.

The Regional Police Officer, Bannu, Region Bannu.

Subject.

APPEAL AGAINST THE ORDER OF DPO BANNU OBNO.1096 DATED 13.08.2020 VIDE WHICH THE PETITIONER WAS DISMISSED FROM SERVICE.

# **RESPECTFULLY STATED:**

- 1. That the petitioner has been charge sheeted as following.
  - (i)."that SI Rehmat Ullah Khan while posted as SHO of the Police station Domel has weak command in his area of responsibility, showed laxity and inefficiency in official work and cultivated relation with drug peddles and pos.
  - (ii). Such act on your part is against service discipline and cultivated relation with drug peddlers and Pos.

    The copy of the charge sheet is Annex = A.
- 2. The petitioner replied to the charge sheet in detail with full explanation. The detail of arrest of Pos,s recovery of narcotics and weapons/ ammunition including of registration of the cases against such criminals. The detail certificates/awards was also reduced in the reply. The DSP/HQ enquiry officer has also entered reply in the findings. The copy of the reply is Annex = B.
- 3. The Performa of my performance for the period from 20.02.2020 to 20.07.2020 is also enclosed as Annex = C.
- 4. The enquiry officer conducted the departmental enquiry per the following detail.
  - i. Obtained record from SRC. Per record 2 minor punishment and 23 good entries were found.
  - اکثراہلیان بنوں حفیہ انفارمیشن تو دیتے ہے لیکن تحریری بیان دینے کے لیےتیار نہیں ہوتے البتہ حدود تھانہ ڈومیل میں خفیہ ذراءع سے پتہ برداری کرنے سے الزامات برخلاف رحمت الله خان ایس اءی ثابت ہوتے ہیں۔
  - iii. Charge sheet reply was reduced in the findings by the DSP/HQ

Alexa

- 5. Mere on the basis of secret enquiry and hear say evidence, the DSP/HQ submitted the findings. Even DSP/circle was not examined about my performance. The copy of the findings is Annex = **D**.
- 6. On the basis of the findings of the enquiry officer the petitioner was dismissed from the service. The copy of the dismissal order is Annex **E**.

# **GROUNDS FOR APPEAL:**

- 1. No documentary or any oral evidence was brought on record against the petitioner which is clear from the findings and dismissal order.
- 2. The DSP/HQ only based on secret enquiry and hear say evidence which is not admissible in any relevant laws/rules.
- 3. The competent authority with out going into the facts of the enquiry of the DSP/HQ agreed with it and resolutely the petitioner has been dismissed from the service. The dismissal order is Annex = F.
- 4. Neither final show case notice was issued nor personal hearing was made and thus the mandatory code and rules were violated by the Authority. The punishment was awarded in hurry manner.
- 5. The petitioner has worked as SHO PS Domel with full command and control on the area of responsibility and as well as on subordinates.
- 6. The enquiry officer has not associated the DSP Saddar to ascertain the falsehood and truth of the charges leveled against the petitioner.

# PRAYER:

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In view of the above narrated facts and circumstances it is humbly prayed that the dismissal order may please be declared as set-aside and re-instate into service with effect from the date of suspension. I also wish to be heard in person.

Yours obediently

Rehmat Ullah

**Dismissed SHO Domel** 

CNIC No.11201-0392162-7

Mobile No.0345-9145230

# **ORDER**

My this order will dispose off departmental appeal, preferred by Ex-SI Rahmat Ullah of district police Bannu, wherein, he has prayed for setting aside the order of major punishment of "dismissal from service", imposed upon him by DPO Bannu, vide OB No.1096 dated 13.08.2020 on the following allegations:-

- That the appellant while posted as SHO PS Domel has weak command in his area of responsibility, showed laxity and inefficiency in official work and cultivated relations with
- > Such act on his part is against service discipline and amounts to gross misconduct.

Service record, inquiry file of the appellant and comments received from DPO Bannu were perused. Moreover, the appellant was also afforded opportunity of personal hearing in orderly room today on 10.09.2020 in connection with his instant departmental appeal but he did not substantiate his innocence.

Therefore, I, Awal Khan, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (amended in 2014) hereby file his appeal and endorse the punishment awarded to him by DPO Bannu.

ORDER ANNOUNCED

(AWAL KHAN) PSP Regional Police Officer, Bannu Region, Bannu

No. 308/ /EC, dated Bannu the /0 /09/2020

Copy to District Police Officer, Bannu for information and n/action w/r to his office letter No.11170 dated 22.08.2020 along with complete service record for record in office which may be acknowledged please.

SRC/POLONI / Fayi Missal Clerk
Fox n/achion

First Police Officer
BANNU 4/9

(AWAL KHAN) PSP Regional Police Officer, Bannu Region, Bannu

\$10/9/20

800b

parts 17

The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar

# Subject:

MERCY PETITON AGAINST THE IMPUGNED ORDER VIDE OB NO. 1096 DATED 13.08.2020 WEHERE BY MAJOR PENALTY OF DISMISSAL FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT AND APPEAL VIDE ENDST; NO.3081/EC DATED 10.09.2020 WAS FILED BY RPO BANNU AND TO RE-INSTATEMENT INTO SERVICE WITH ALL BACK BENEFITS.

- It is humbly submitted that I was enlisted as constable in Police Department in the year 01.04.1990 and was promoted to the rank of SI. Since then, I am performing my duties with great zeal and zest.
- On 21.07.2020, a charge sheet along with summary of allegations vide No.554-55/SRC dated 21.07.2020 was issued by the DPO Bannu with the following allegations. Copy of the charge sheet and summary of allegations is attached.
  - (i) That you SI Rahmat Ullah while posted as SHO of the Police Station Domel has weak command in your area of responsibility, showed laxity and inefficiency in official work and cultivated relations with drug peddlers and POs.
  - (ii) Such act on your part is against service discipline and amounts to gross misconducts.
- For the purpose of scrutinizing the conduct of accused, DSP/HQ Bannu was appointed as Inquiry Officer.
- The appellant replied to the charge sheet in detail with full explanation along with progress report achieved in arrest of POs, narcotics peddlers and confiscation of weapons. The detail of arrest of POs recovery of narcotics and weapons/ammunition including of registration of the cases against criminal, list is attached. The certificates/awards awarded me on good performance are also attached. Copy of the certificates and arrest of POs etc is attached.
- > The inquiry officer, after completing departmental proceedings, recorded the following remarks in his conclusion.

"As per record, SI Rahmat Ullah Khan was enlisted on 01.04.1990. It was transpired from his record, that two minor punishments and 23 good entries were existed. While no major punishment was awarded during his entire service. As per secret information, it was dig out that SI Rahmat Ullah Khan have links with narcotics peddlers".

Copy of the inquiry is attached.

- On the basis of the findings of the inquiry officer, the appellant was dismissed from service vide OB No.1096 dated 13.08.2020. Copy of the dismissal order is attached.
- The appellant moved an appeal before the Regional Police Officer Bannu Region Bannu to substantiate his innocence. Copy of the appeal is attached.
  - The appeal of appellant was filed vide RPO Bannu order Endst; No. 1081/EC dated 10.09.2020. Copy of the rejection order is attached.

AND da

# **GROUNDS FOR APPEAL**

- The Impugned orders dated 13:08.2020 and 10:09:2020 are against the law/rules, facts norms of natural justice and material on the record, hence, therefore, not tenable and liable to be set aside.
- the appellant has not been-treated-by-the authority/department in accordance with land laws/ rules specified for the inquiry, on the subject noted above and as such the respondent violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973. It is pertinent to mention that on the same charges, another police officer SI Ghafar Ali was dismissed from service who was reinstated into service by Regional Police Officer Bannu Region Bannu on 10.09.2020 but the appellant appeal was rejected with no plausible reasons/ grounds.
- That the impugned orders dated 13.08.2020 and 10.09.2020 are arbitrary and based on malafide intentions.
- > That no final show cause notice has been served on the appellant before issuing the impugned order.
- That no chance of personal hearing/defense and cross examination has been provided to the appellant which is mandatory as per the Police Rules 1975 and Civil Service Act 1973 before issuance of the impugned order dated 13.08.2020 and 10.09.2020.
- That no documentary proof or eye witnesses has been brought on surface of inquiry proceedings to dig out the real facts which is primary duty of the inquiry officer but in vain.
- That no regular inquiry has been conducted against the appellant which is as per Supreme Court judgment is necessary in punitive actions against the civil servants.
- That the appellant was discriminated and as such the impugned order dated 13.08.2020 and 10.09.2020 is against the spirit of natural laws.
- The appellant has worked as SHO PS Domel with good command and control in the jurisdiction of the PS.
- The inquiry officer has not associated the DSP Saddar to ascertain the falsehood and truth of the charges leveled against the appellant.

### Prayer:

It is therefore, requested that in the above detailed scenario, I may kindly be reinstated into service with all back benefits and the impugned order dated 13.08.2020 and 10.09.2020 may kindly be set aside to meet the end of justice, please.

Yours Obediently,

Rahmat Ullah Ex-SI District Police Bannu

Mob No.: 0345-9145230 CNIC No. 11201-0392162-7

Marks 1

البكر جزل يوليس صوبه خيبر بختونخواه فارم نمبر الم ابتدائی اطلاعی ربورٹ (فائيل) ابتدائي اطلاع نسبت جرم قابل دست اندازي يوليس ريورث شده زير دفعه ١٥ المجوعة ضابط فوجداري ملع مول ارخ فيلك موادع ميلف ارما<u>ل</u> كارونى جِنْفَتِينْ كِ مُعَالَى كُنُ اگراطلا كادرن كرنے مِي او قف بوابودوج بيان كرو تھانہ ہے روانگی کی تاریخ ووتت ابتداني اطلاع يتج درج كرو مبرغره سناي ساعوا وماس فطدف ن سان مول مورج ها المرسان ما ما كالم ما المرسان المرسا مرزمان سکنه نودین خل جردا کی ضلع بول علی دمیل کردوی دی جکاری میری دیدی چی امر مسئیات کا مکروه دهنداهی کی چی عوای ایناس ایک کولود کا سے سے الال هی وی مز كوس بلاك ولان ديورش كان ي مها من ركفي خرك بالله معل عال فواصدي كل سَ حوام اله اله المعالم المعال -bomel 03-03-020

4-3-20 ا کیز جزل بولیس صوبه خیبر پخونخواه فارم نمبر ۲۳ وايل) ابتدائي اطلاع نسبت جرم قابل دست اندازي بوليس د بورث شده ذير دفعة ١٥١ مجموعه ضابط فوجداري 19 4-03 61 100.20 40 04 <u> فقر کفت جرم (معدنعه) عال اگر کچالیا کما ہو</u> کارو کی جونتیش کے متعلق کی کی اگر اطلاح درج کرنے میں آو قف ہوا ہوتو وجہ بیان کرو تمانه برواتكي كارع وونت ابتداني اطلاع تتحدرج 32000 My Ho Ole Ola Cil of Suns No 60 is e ASto Ubville الم أثيل أنعل ة لساً كالخشاكة د فالق داركة ها ي حقيما إلى ب 88 77 كول ما عرفاروس ما روار فرمر وام 1. Cis es 3462503 مر 3162503 مع ورع مرسر ما المال المال 3162503 مرسر ما المال المال على المعاد على المعاد المال ا ما رور در الرار ی ای ورج و رود و رو مع ملے میں رقوم کو لا فاری وریز

AUAD

Was onle ches KNOC21(15) b'sm) 4 6 1149 1953 اطلان كيني اطلان دمنده كادسخط موكات ياس كي مهر إنشان لكايا جاريكات اورا فسرتح يركننده ابتداكي اطلاع كاد شخط بطورتصديق موكات ووف الف والمران ووشاكات بالمقابل نام برايك لمزم بامشتم على الترتيب واسطى باشند كان علاقه غيريا وسط ايشيا يلافغانستان جهال موزول مول لكصناعا ب

ADAM

11101-3474603-3 16-1 0334-8449996 وأبه خير بخونخواه فارم نمراك - فارم نمبر۲۴\_۵ يندان اطلاق د يورك ENIC NO /102-0369971-5010/12 0332-89894001 (فائيل) ابتدائي اطلاع نسبت جرم قابل دست اندازي بوليس ربورث شده وزير دفعة ١٥٢ مجموعه ضابط نو جداري 2 09:30 Co 12 03 6st. تاری دوت رپورٹ میرے 12 مو*عث* نام دسكونت اطلاح دبنده ستغيث مختمر کیفیت مجرم (معدد نند) حال اگر کچه لیا گماهو كَ يَوْتَتُنَّ كَ مِعْلَى كَا كُوا الله عَادِينَ كَرِفَ مِن وَقَفَ وَا وَوَدِيمِ إِن كُوهِ فيأنه برواكى كارخ ووقت سروبرا والوق لولبوط رکے شک کی ساریر حاصر مار والراة كا عداك ساقة مالاه عرب فحق عدد ملف جرك الماري حريره مع مارات العامل مادر کرد می و 222 در ایری درد من میران میران میرانداد درد در ایران میراندان میرانداد دردد در ایران میرانداد میرا with the the 258A 1152451 My 129 فرو منقسر لولس س كرك مي احسان ولعظر لولسالكرد وكما والركم إكرسي اصان كرص منالط كرمنار کے کارڈ گرماری علیرہ حاری کن المنكر المساوي المساكرات الرساك المراك المرك المراك المراك المراك المحدد المادري مام يون برسيدي ورامله براج برم مام وكرير رامندل 4HC/Domes 12-03-020 Avery

16-4-20 يم جزل يوليس مويه خير بحنونخواه فارم نمر ٢٥ ( فائیل ) ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس ر پورٹ شدہ زیر دفعہ ۱۵ مجموعه ضابطہ فوجداری 2 07:30 Cos 1600 Ost (249) ارخ رات رابرك و 60 الورس 2:08:15 نام دسکوات اطلاع د منده مستنعث مخفر كفيت مجرم (معد نعه ) حال اگر بجولها گهامو حائة وتأبد فاجبله تفانه ساورست نام الموات المن الله ول مقوم الله المراكم الورادي بما ولا كارون جنتش كم معلق كا كالراطلاع درج كرف عن توقف بوابولو بديان كرو السرك وي معلى مدر المسلم مرجم درا ممل تمانه بية اروانگي كي تاريخ ووقت الرونيات رفت الشرفان المثرافي اطلاع من و مدى مروه مدين كالوال مرور و مدى مدست كالوال مرور و مدى وعول مو ترج و بي . أفر را نيام كوانز و وعلى أفروس حر غرما دف عان نام ، مام الما المعلى المال عن کھاری فیرارس کارالوری س راعل کی فرن حیاس کے حاربا سے اطلع کو دھر مرحالاً ما العراق العربي من الم المر ما كم معرى أكر بوت بالدائد جوان العربر معنى جوم مزك معيرى والم سي معلى را تعالى المراك المرك المراك المرك المرك المراك المرك المرك المراك المراك المراك المراك المراك المراك المراك المرا الله والما المرابع الله والمنفع الله والمنفع المرابع و برا مرا مرا مرسک نیان برنگ نمارس کو بالگار درس کی بران بران بران در بران می ایستان اعداد علی علی از المرس از ارس ان و جام آن و ویلی ماه از ام حرس کی 100 و ایران ماده مرس کی 100 و ایران مرس کی استان میران از از ایران ماده ویرس کرد و از از ایران از ایران ماده ویرس کرد و در از از ایران ماده ویرس کرد و در از ایران ماده ویران کرد و در از ایران کرد و سرمرى أنا ردكين كرنيد مرين القرب مقيراً في مرجرين عن منورسات منروش منارس ول دسلی رافعل سے الربیاتی رون سے قبل علی ماریس ما تماری میل المعال مقدار س موس الرمیان الله ما مادم الماري على معرف ورار وماع مادم دماري الماري مادم دماري دوراري موري الماري مادم دماري دوراري موروري العمال في المرب المنتي كا موروس المرب الم ع جرا ما الم هاك رو لوف الم الم المون كوس حوام 188 مراف في ما يا ما ما المون كوس المون كوس ما من الم

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8 1 VC 1" انسيكر جزل يوليس صوبه خيبر بخونخواه فارم نمبر ال فارم نمر ۲۲س (۱) ا برال اطلا کی دور ا 0331-9080198 ( فائیل ) ابتدا کی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعی ۱۵ مجموعه ضابط فوجداری نام دسكونت اطلاع دمنده مستغيث مخضر كفيت مجرم (معددالعه) حال اكر بجهليا كيابو أحائ أتوعدفا صله تقاند سے اور ست وزيرزاده ولدارتا مام الا ۵ ا نام دسکون کزم کارٹی جنتین کے معلق کی گی اگراطلاع درج کرنے میں توقف ہوا ہوتو دیان کروں اسمبر روم کی برصر کر معرف میں میں اسکارو تھانہ ہے روائل کی تاریخ ووتت ابترالی اطلاع فی ورج کروارکدیرن راسار برجی تا کی این رج - الله عاد ما المعنا المعنا معنا موه والمعالي والمعنا والمعنا المعنا الله وولان المست مي و الموادي والمرود الله المرادي بمراك الله والمرادي المرادي ولازن بولساك نازك ورك نع المراحات صام لل المربر سنكود كاست لساته راله فار ماندها بو المدس المافر مي وس براك روال جو برق مراكم و في مراكم و في المراكم و ويما والرائرى درافت وراف ورايا ما يمتر وزراده فلدادالي في ماين المرين ن من ١٥ كرا درس على وك بريا كرية عما كرقايا المالية الم وسي عمر والرياس كفافر سر عرا ما موده من المراس من المراس من المراس من المرادة كور مار المراس الم 

رُجِزل بوليس مورخير بخونخواه فارم نمر ٢٣ فآدم نمبر۲۳\_۵ ا يُرَا فَي اطْلاقى ريورك (فائس ) أبتدا لي اطلاع نسبت جرم قابل دست اندازي بوليس ريورث شده زيرد فعي ١٥ مجموعة ضابط فوجداري 2-11:45 -39 0/020 Est 265 مُخْتَرِ بِشِيت بَرِم (معدنغهُ) حال اگر يُحَمَّلِيا كيا بو كراهدا و مزد ماز من عرف مستر واقع دادره حأية ووندفا سلرفنانه سيأورست شير سرد الله والكاب الدك فالاره الروني وتنتش كم تعلق كي كل اكراطلال درج كرف من وقف بوابوتو وجد بيان كرو غانه أن روا كَل مارخ ووقت ابتراني اطلاع يجورج كروارك خرون مراسه بوص قاجي مقريه کارے برقات الزار فاق علی مردو کو ترکوار 1217 و جو گئی ہو کر درج دیا ہے۔ کو فیر کری ج تھا ہر دور کا مروز من وہ معری کولیس مردران کرنے ہوگی نام کو ناکہ بردی سے پر کر موجد دفیا کہ قسرے کا طورع دی کہ اور التروين فرا استارى تمرير والقائر ولاقل كركة بالزوفر بعلام تحاله فقال 1 Co of white @ 2011SA DP 12 10 Co 488 - W 1 3 C 400 4010 11 13 Co 350 الإر 15AA عن أكديس على وتوعسر الدوروي عني . كور فرس فرول در ولا المراد والعنان الملاع كو مصرفه جانكر على فع زورى لولس وسه ما يروق عرك مر ديك لوى لو والمعن عال فرا عن العاقب مرالع العراسان في قامل مر ملاية كما تعوينا كر آلادل ليه من داخر به وكريس بن برا. المعان المان في المعاني المعاني عال فيك كف برام ر اگریک جو برونے بنولیے ڈیسٹ ترکزی وزن کرنے پر ۱۱۱۱ گراور آگا ہے۔ درس برف فر فرجہ برلائی سرکے قرب فرنس سرنے کو ترکیاب کریا مالا کا انسان کو ترکیاب کریا مالا کا مسائی کو شاری دربست ہے۔ اوا والرازى وروس بردور بروی مای مقت مرست کسیم مسلواز ۱۱۱ کسیم عقاب می مقتب درج رفسترک تعدی مترولید کمار می موج بر بوجود ی دستور انگریزی را در الان مای دور کارد کرداری کفرست والم الحاق کارداری کفرست والم کاردان تعدام کرداری داری برای برای برای برای برای کورد کرداری الاروی کورد کارداری کفرست والم الحاق

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32-5-20 فارم نمبر ۲۳ ـ۵ يكوجزل وليس صوبه خير بختونواه فارم نمراك ابتداني اطلاعي ربورك (نائيل) ابتدائي اطلاع نسبت جرم قابل دست اعدازي پولس رپورٽ شده زير دفعة ١٥٢ مجموعة ضابط فوجداري 067 d3 - 67 6 d3 616 كارولى جِنْنَيْش كِ تَعَلَّق كَا كُوا كُوا كُوا كُوا رَبِي كُونِ فِي مِنْ وَقَف بوا مُوقو وجه بيان كرو الممارك في م تھانہ ہے روائل کی ارتخ ورت ابتدالي اطلاع ينجدرن كرو مسراع طرانسان مصعرات ا tolloge on to our store and intigue 1000 gus so l'ént @ dein our 36,000 600 Eles Chil Died 6 BBi 1190 SHO / Domas 12-05-200

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12-5-20 يكربزل وليس صوبه خير پخونخواه فارم نمراك ا يُرافي اطلاعي د يورك (فائيل) ابتدائي اطلاع نسبت جرم قائل دست اندازي يولسي ريورث شده زيردف محويرضا بطرف جداري أنام وسكونت إطلاع دبيند دمستغيث مخفر كيفيت مجم (معدند) مال اگر كهليا كما مو אנוסוגה כסוה חל על كَارِدُنَا جَنْتُشِ يَعْمِ عَالَ فَأَنَّى الرَّاطَالَ ورنَ كَرْفَ مِن أَوْقَفَ مِوامِوْ وجِيان كرو ابتراني اطلاع في ورق كرواند خري راب رون عامي مذه عار و السفاري الاستعمار مراواد 114 موقول موكر در جرم ب الفيرا كل القام والرارد ور کست عدف مرودت اسم قسر داوس دی کم قسم استهاری اور آباد عسرف ریافت ولد مرالفا إسليم وسيم مطل و توالم مقرم 14 مراع ما المراع واعتمال والموالي ما الرمر ووري مرزس دروو از کرنے کا حکوم د تعدہ میں معدوہ الله کا کو معدور حادث می مع عمر حمادی کا ور سان داری نام مرسی نظار کاون سب رفت الشان ایم مع نظری نظار استرس طرو مان الا اللابر واكر ولانعي فسرے متلائے کوئے فلے کاشخص وجود باکر فسک باتھ س کالاملاسکا العان في الواسماري كو د معقر بي بدري المراك كالفراك الدر تردعي كاري في ت برا سرور نفار اندای ماکر ورک کرد. بروس نمانی و بروش ورک کرد. اور المراق الورتيان راوره في الوسال درك رافع ما در وس مرد المرق ما المراس ال راز الرص عامی القیمیم، نفیمت میرست کسیکر عدر اوار 1217 ارسال نفارسی و سخط انگریزی روسالدر فار 10 کارداد کی تصافر کرے بر مرزی مرکب برای کرداد کی تحصار بور توکنی FIR مرحی لعبت والم BBI سنان کی جاتے ہیں۔ زرحر عمر لے سنتی داور ع الرائ کا میں۔ ASHO DOM streds

30-5-20 (1) 0-117-116 0305-9558137 PM بكزجزل دِيس موبه خبر بخونواه فارم نبر ٢٢ م ما م ٩٥ ي ٥٥ - ٥٥ هـ ابتراني اطلاعي ريورك وشر (مائیل) ابتدا کی اطلاع نسبت جرم قابل دست اعمازی پویس رپورٹ شده زیر دفع ۱۵ انجمور ضابط فوجداری میں اسلامی کیا ا (مائیل) ابتدا کی اطلاع نسبت جرم قابل دست اعمازی پویس رپورٹ شده زیر دفع ۱۵ انجمور ضابط فوجداری میں اسلامی کیا بل 2000 ونث 17.20 ع ماري ورور ورور ورور المرور المرور المرور المرور ورور المرور ورور المرور SHO CIGINICIES محقركيفيت بحرم (مدوند) مال اكر يحدل محياه جاع دقوه فاصلقان ادرمت عالى مران الرحائم منزع بشابد واجع ميز بدراه كارد لى جنتيش ك عنال كار الله كادر ما كرف عي قف بوابود وبيان كرد المسترس في حدار سد كم المسلم المرسم من المسلم تھانہ ہے روائی کی اریخ ووتت ابتدانی اطلاع مینی و در می کرودان<sup>ین در</sup> در می استرانی استرانی استرانی از در می از در می استرانی استرانی استرانی رهت الندمان ۱۲۶ وخت الماصل عدود الارد الدامول مورد الماسية العدم المورد الماسية العدم المورد الماسية العدم الم مصل اصر مدرد دران كنت عهر من العدم من الدورة الرجاعة بيسيات مروض شابع المعلمة المعلمة المعلمة المعلمة المعلمة مدا هي جائد من موجه به المورس مروضت رئيست عليوه واعتده من كفورت المعلمة المعلمة المعلمة المعلمة المعلمة المورس مرحم حا المرسي مع لوي الولس المورد المائية وقودة الما المرص والقيمة المورد المعلمة المورد المورد المعلمة المورد المورد المعلمة المورد فيرس مُروفت كرن مين مغروف مقار فين الوائي يوري كوم مُعَقَدُ بِعَالَ الْمُرْكِلُونَا الْمُرْكِلُونِا عری تعافی کرے دریئن ما تعمین سفید الامین کفا فیریفیت کروراز ہے میں کا بیات ہاکے الاتفا بدش سامر آنفاها حار عین کے برقہ میں مرا معتبی و منافعہ ویکل کارولوگ او 20 گرام افری عن میں میں میں 18رم جرس علیہ کے بندیاری براتعرض فیریہ Le Fil لقاما مای گرام جرس سرمارس لرواس مبرشار کے ارف میر و شعبد لواس کی مذکورہ شاما کو میلا عبر ماہ کا یا رحتی گونتاری درمش سے وراسلہ تعرف قائی میدور مست کا سے عزید اور الالا معا مزسے کوئے سی ہے . سعم انگریزی رحت الند جان حال کوسیل 200 عارواتی بعار کوئی مراسد مرج بع ما و جا س بعر نقول Fix بخ على تعشى فعالم المطالف كالعالم عالم بين المرج 30-5.2070

V8 VUC-3 يكرجزل بوليس صوبه خيبر بخونخواه فارم نمبرا ابتدائي اطلاعي ربورك (فائل) ابتدائي اطلاع نسبت جرم قامل دست اندازي پيس ريورث شدة در دفته ۱۵۴م محرور شايط و عداري 216,20 Ges 25 Taco Est £17,30 as 25 00 (100 2 16,30 تاريخ ووقت ر بورك مرمق كد مرمت كارون جرتفيش ك علق ك كا الراطلان درج كرف من توقف موا موتو وجد بيان كرو تقاندے روائی کارن ووت ابتدانی اطلاع نیجے درج کرو رہے کہ سری سر مرموض کی شرح 15/15/2014/1-15-0500 Style 288 NOV, J. Cin Ses Clevice Cilio لله المست ملافي من دولون مرفورو الملاع وم الروام ل المراس على رويو المار الركا توامع 3 و يا شار الماري و ت صرب فروف کرنا کا مکروه دهنده کرنا می تعروی کیا عن در در 15 15 6 10 6 1 1 0 6 00 00 00 00 10 1 1 0 15 Se posto sufficient por line by or, PASI Domel 25-05-020

JB. 31-5-20 114.3 انسكغ جزل بوليس صويه خيبر پخونخواه فارم نمراك ابتداني اطلاعي ريورك (فائيل) ابتذاكي اطلاع نبيت جرم قابل دست اندازي وليس ربورك شده زير دفعة ١٥١م محورة خالط فوجداري ارخ دونت د برك مع الح وطب مه دار AR 212 M مخفر كفيت بحرم (معدفعه) حال اكر مجوليا كيابو على ملزطال شام ملك ع شياملا واقع سيم مسلام كاروكي جونتيش كرمعلق كأكي اكراطلا كادرج كرفي من وقف بوا مواود وبيان كرو تماندے رواعی کی تاریخ دوتت الترافي اطراع يجوري الرواكات وتري سراك المرعون ال العنال 40 مرس كاسب عمر واز 1217 وعول سوك در 7 دال محاليدا روزس مع نفري بولس نسلته گذت برد بملي بيب نه اور وراد الوجود وقاكر فسرند اطلاع دى كريدا كرما فرنشيات فيروتيان في الماني في سالية سالسك سراحل طلوبر والا مقراب اعلام وحرد 1200 و 1 عرب و 100 و 1 25-25-25 - 25-25 - 3000 Pr 325 - 300 Pr 325 - 3000 Pr 325 د فتوم الله مرود و سال الله محمد في جانكر فورا من عدد و يول من الله و ال الوملزهان متذكره ما لا يوليس في مريم من طبيعة المعالمة المركز حامر ما ما المريم على الما المراسم على المراسم ا ملىرالسين خان سكر سراخيل مو ورها حي آول الله كورها حي المالية المالية كورها حي المالية المالية المالية المالية مراد المالية ا کا انتان کرنام کی ماصل و را او کرنا و کرمارال الا آسکر سط عن ارد الحمر الا جاكف مركر نقول FiR لغرض كفيتنس حالا (BiBi المان الله عالم على الم Attested

31-5-23 انسكار جزل يوليس موبه خيبر بخونخواه فارم نمراك ابتدائي اطلاعي ريورك مي ١٠٠٥ ١٠٠٥ مرده دره ١٥٠٠ (فائيل) ابتدائي اطلاع نسبت جرم قامل دست اعدازي پوليس د پورك شده زير دفعه ۱۵ محور ضابط فوجداري 2/9/10 ces 3/200 Est 32F كارولى جوننيش كے متعلق كى كا كرا طلاع درج كرنے ميں توقف بوا بوتوجد بيان كرد السيسيس مركب مير مركب مير من كري كا تفانه سے روائل کاری ورت ابتداني اطلاع يتح درج كرو أن فرين مرسد بقوي ما كالمناط ماي we the party of the west of Pice Perispeco Po 25 00 les 817 Pie 0,3/10 ppe 40/4/90 12 000 و دنون بولس ماء وتورد 10 18 1 de Sal 0 1 200 50 200 Cos le de 50 281 Chia Colad 920 Show of Solar a 020 ASHOL Domel

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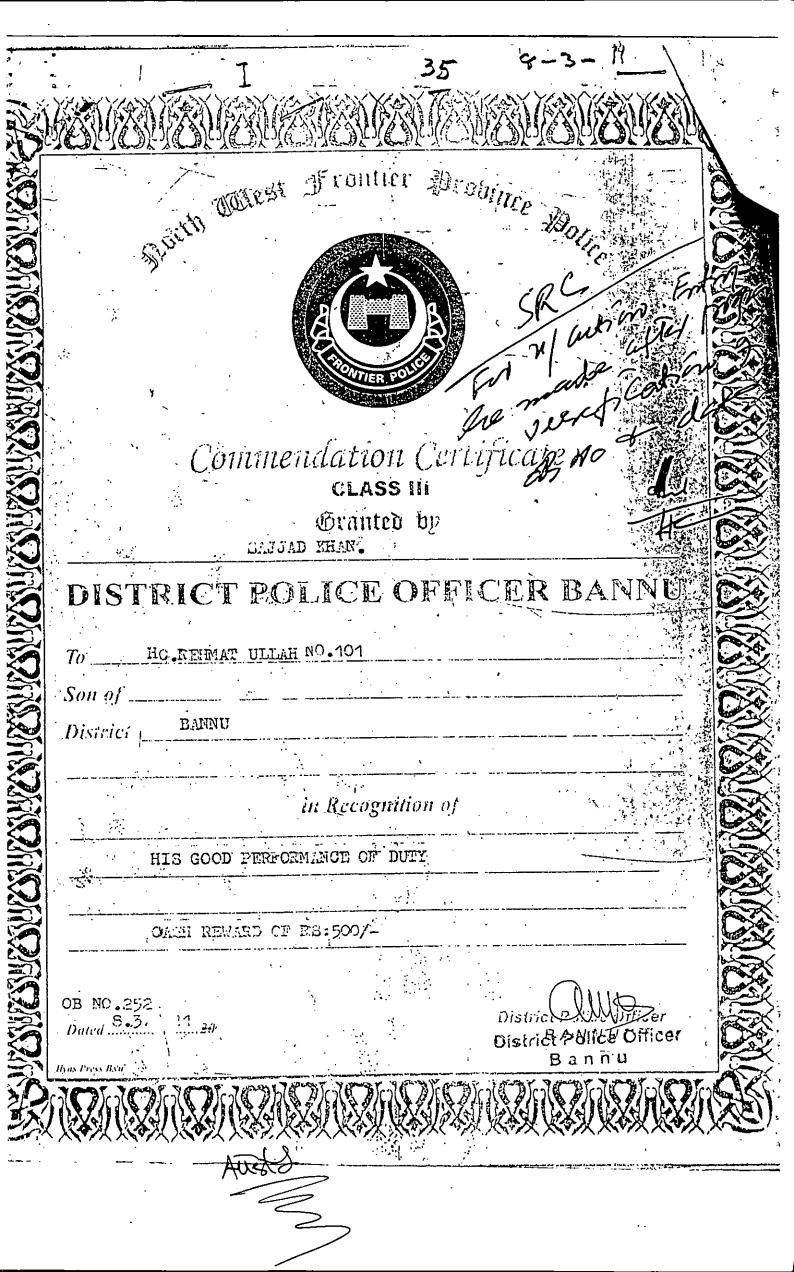
0346-9288723 6317-1905457 فارم نمبر ۲۳۵\_۵(۱) ا پیمرافی اطلاعی را پورٹ ابتدائی اطلاع نسبت جرم قابل دست اندازی بولیس ر بورٹ شدہ زیردف میں ۱۵۴مجموعہ ضابطہ فوجداری يرم (معددفعه) حال الريجدليا كيامو-لَّنَ كَا يُحْ الرَّاطلاع درج كرنے مِن توقف ہوا ہوتو دجہ بیان کرو اسسسس ابترانی اطلاع نیج درج کرو- رس فر سرس مراسه ایم ماعی شرم میان ایر عمر نور جمد مراس می درج درج در می می ایر را دارها می در در درج AN في المورك الموري المراج والمراج كرورة والمراس في المراج كرورة المراس في المراج المراج المراج الم BUS OUF OF ENTERON ON SHO DE STORE OF SHO الله موان ما المراق و و مواده کا (3) Com and sold of the Constant of the State of State of the State of

ATTORES

13-7-20 22201-6220877.3 VNC.3 بجنو تخواه فارم نمبتراء (1)0\_177, 33 860.6.5 del 31, 101 (1)0.787, 071\_0(1) ابترائي اطلاعي ريورك ابتدائی اطلاع نسب جرم قابل دست اندازی پولیس رپورٹ شده زیر دفعه ۱۵۴مجموعه ضابطرانو مداری 217.60 وتعلق كالكا الملاع درج كرنے بن توقف بوابوتو وجد بيان كرو مراسر كوركر مراكم مراكم ول ابتدافي اطلاع يتي ورن كرو- أبي يحرس كر بوي ما ما كالمرح ما ما 2 ( 2 ) le ( 1) po de de la factor 288 miles frances de la proposición de la la constante de l Companice Maliki 200 1 1 30 20 1 1 20 10 PA 30 24 / ion idi pura te ( ) such for for chill & ANDING CONTROL WE SURVEY SURVEY OF BUT SON SURVEY S 3-7-20 AMHUDI FM

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ابتدائي اطلاعي زيورك الم متح 5.5 55 3000 فادم بر١٥٠ مر٥١٥ ا ابندائي اطلاع نسبت جرم قابل وست اندازي بوليس ريورت شده زير دفيه ١٥١ مجموعه ضابط فوجداري 2.08.00 - 39 17 07 Est £:10:00 \_\_ 17 00 18,10 208:10 \_\_ 09:17 07 19/20 MONE المفك كذار مرين حيرزل على واقع براح عي المرزاري وليغفل منان سكر براجي ا المعلق كا كا الراطلاع درج كرية من توقف موا موتو ديبان كرد برسريكي مرار المراجر وما كرا المراجية المراجد ابتذائي اطلاع فيجودن كرو- لاكر تربرك راب برهن عافي عقري 167. 15. 100 15. 15. 100 1217 18 W. C. HOCOWILLES TO ر المرابع و واحق كريك معلى سلخ بر رنب طر باكر به المرابع و المرابع المحراج في القارد و المرابع المسلطية المسلطية المسلم المسترين مراك على والم فقل منام بالمالم ما ماست رسد ما والمراد المراد المراد المراد ا 200 - 17 المسترين المراد المرا الع در بروت فروق فير لولاس في مراور مراك في المراك في الكريل الم المان الم المرادعي فائي فقدر مرس كنتا عدوار 1217 الرسال تعارب حمد معرف كنت المراد المرادي عالى المرادي في المرادي المرا 2013,00 181/poul



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## COMMENDATION CENTIFICATE

CLASS HE

Granted by

Mr. Yasir Afridi (P.S.P)

## DISTRICT POLICE OFFICER BANNU

To SI Rahmat Ullah Khan SHO Haved

Son of\_\_\_\_

District \_\_\_\_\_ Bann

in Recognition of

Good Performance in Cout duty: arrested

accused Amnat Ulah 310 malak Van 710

Kaski Haved wanted in Case FIR. NO

179/2006 ULS 302/324/148/149 Ps Haved.

OB. NO. 1061

Dated 08/11/2018

District Police Officer

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	THE STATE OF THE S	
	COMMENDATION CERTIFICATE	
	CLASS III	
	Granted by	
	Mr. YASIR AFRIDI (P.S.P)	
	DISTRICT POLICE OFFICER BANNU-	
		a55.
San J	To Kahmat Ullah SHO Ps Haved	
(8)	Son of	
_GS722	District Banny	
		(C)
	in Recognition of	
		<b>6</b>
	Arrested Do Sakhi Zaman	
		<b>22</b>
	OB NO: 1124	
	District Police Officer	
	Dated. 2-7/	
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8278		
	March 1	
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26/12/018

## COMMENDATION CERTIFICATE

CLASS III

Granted by

Mrs YASIR AFRIDI (P.S.P)

### DISTRICT POLICE OFFICER BANNU

To	Rahm	nat	iille	ah K	han 31	10 H	aved	ن شاهای سا
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Son	01:		<u> </u>		<u> </u>		<del> </del>	 

in Recognition of

NOOR Muhammad 510 Ruck Mi Khel wanted in case FIR NO

08.NO.1206 Dated...14....12...12018



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## COMMENDATION CERTIFICATE

CLASS III Granted by

( P.S. P) Mr. YASIR AFRIDI

### DISTRICT POLICE OFFICER BANNU

To SI Rahmat Ullah Khan

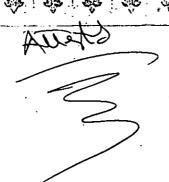
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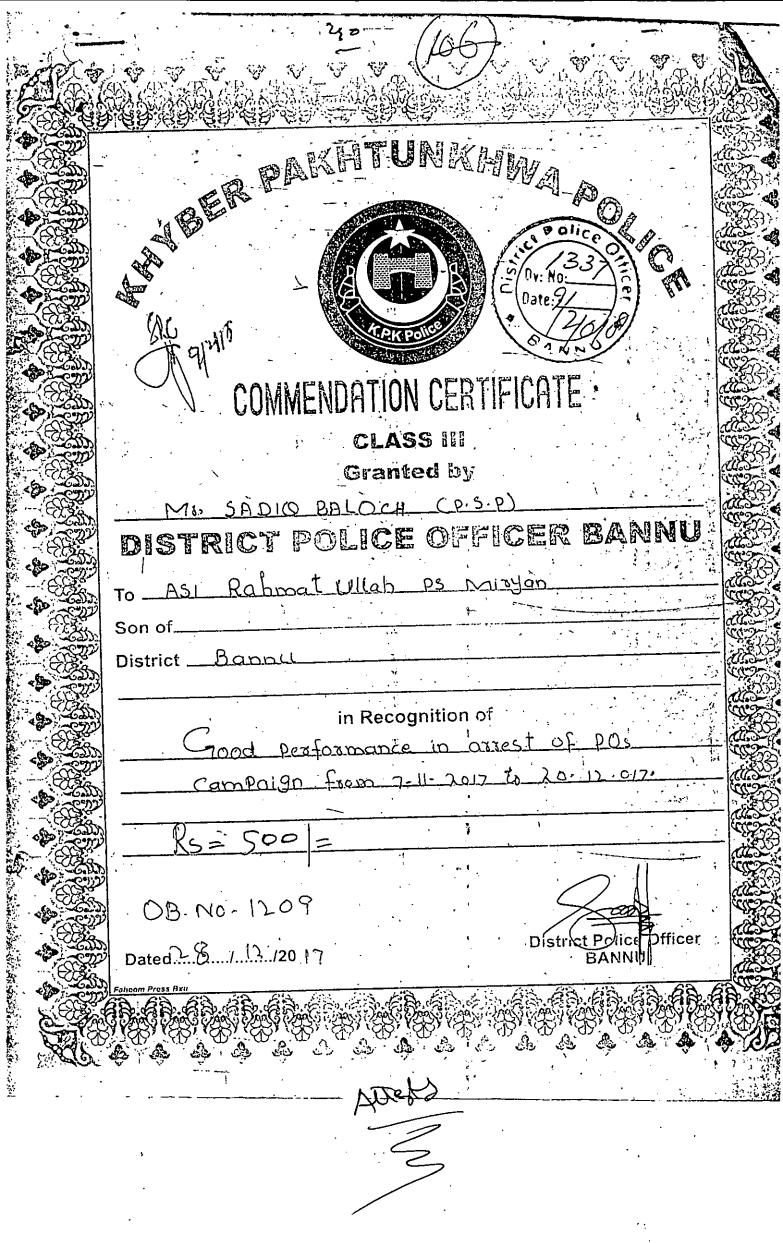
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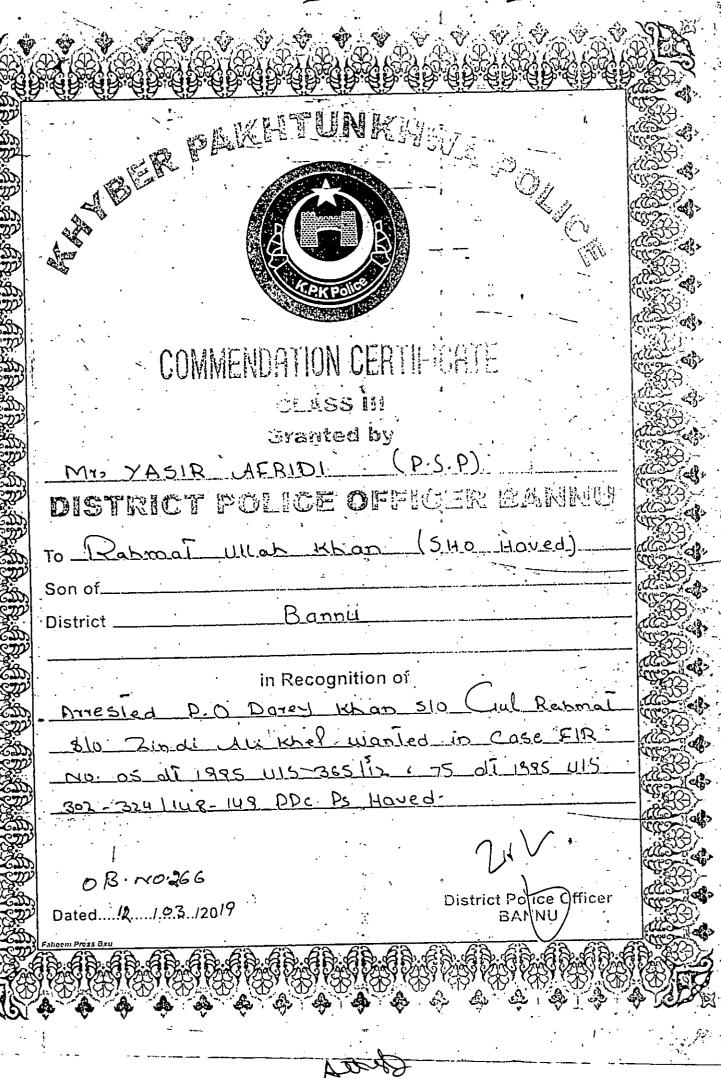
Performance, Got 3rd

OB. NO. 1171

Dated. 26 1/2.120 18







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## COMMENSION CEPTERS

TAGS IN

Contain State Di Mr. YASIR AFRIDI (P.S.P)

DISTRICT FOR SERVICE OF FROM R. R.

To SI Rahmat Ullah 340 Haved

Son of.....

District Bangu

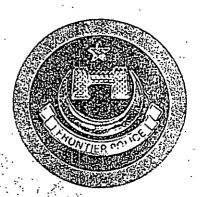
at ilecognition of

Arrested P.O. Abdullah 510 Cul Badshah 710 Tange Khel Landi Dak.

OB. NO. 334

Dated. 27. 103.12019

# Potth West Frontier Probince Balico



## Commendation Certificate

CLASS II

Granted by

Monammad Masocd Khan Afridi (PSP)

## DEPUTY INSPECTOR GENERAL OF POLICE BANNU REGION

H.C. Rehmatullah No.101 Inch: Casualty DHQ-Hospil: Bant

Son of \_\_\_\_\_

District Pannu Distt:

in Recognition of

Arrest of accused Umer Ali alias Azmaraie s/o Sher

Ali Khan r/o Ghora Bakka Khel involved in blind case FIR No.43

dt: 19.4.09 U/S 324/353/34 PPC, PS: Mirian, with cash reward-

NO. 2220-21/R 

Dx Inspector General of Police Sannu Region Banzu Deputy Inspector General of Police,

BANNU REGION, BANNU, N.W.F.P.

12-6-19

ON STOI

A STANCTURE SERVICE



## Commendation Certificate CLASS III Oranted by

Mr. YASIR AFRIDI (PSP)

## DISTRICT POLICE OFFICER BANNU

To Rahmat Ullah Suo Mandan.

District Banny

in Recognition of

Lot And Position in the Crime meeting

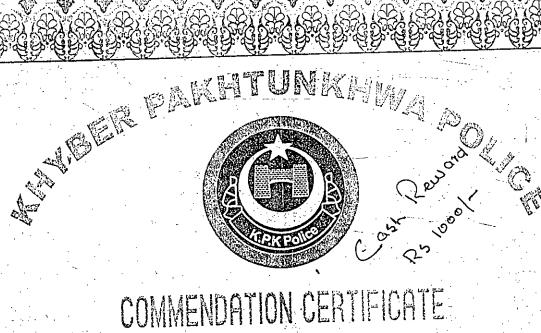
Cash reward RS 2000/-

OB. NO. 606

Dated 12/06/ 2019

District Police Officer

Hyas Press Banna 0312-0385050



CLASS III

Granted by

Mr. YASIR	AFRID!	<u>CPSPJ</u>			
DISTRICT		dffici	er B.	MIMA	
To SI Reim	et Ullah (	540 M	andar	)_)	
Son of		it. Distribution of the state o	بينان المناد الميا الموسود والمتوادة مها الداد ويد	المستخدم و <u>مستمروه مرسم مست</u> ود المستخدم المستفروه الم	
District	Ŋc	mou	·		ا الآن الأقرار -
	7 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -				- 1

in Recognition of

OB. NO. 615

Dated 14 10,6/2019

District Poli BAN



## COMMENDATION CERTIFICATE

CLASS III

Granted by

11112 1142115	サアス	<u> </u>	· Chahl	
,				
DISTRICT	POLIC	JE OF	FICER	BANNU

To SI Rabmat Ullah Khan

Bassou District \_

in Recognition of

accused Miz Payo slo Kakar Talab Abbas Mondan wanted Mandan: Rs-

OB.NO. 644 

District Police Officer

## \$\\$\\$\\$\\$\\$\\$\\$\\$\\$

Son of\_



## COMMENDATION CERTIFICATE

CLASS III

Granted by

Mr. VASIR AFRIDI EP.S.P.)

## DISTRICT POLICE OFFICER BANNU

To SI Rahmat Ullah (SHO Mandan)

District -

in Recognition of

Recovered Abductee Muddasir Abmad and arrested accused Chani-ur- Rehman wanted in Case FIR No. 610 Dt 25.10:019 506/34 PPC PS Mondan

03. ~0.2106

Dated...29.1.16.12019



## COMMENDATION CERTIFICATE

CLASS III

Granted by

Mr. JASIR	AFRIDI	(P.S.P)	- 2 m
DISTRICT	POLICE	officer e	ANNU

To SHO Rahmat What (Ps Mandan

Son of\_ Bannu\_ District \_\_\_

in Recognition of

Arrested Gerused Yasis Sto Gul Ria3 210 Borki Kla with 9mm Pistol after an hour of the offence wanted in case FIR

NO. 632 Dt 31-10-019 UIS 302-34 DPC PS MOD

OB.NO. 2/2/ Dated 09 / /1 /2019

ال بمركاس ا





## Commendation Certificate CLASS UN Granted by

DY: INSPECTOR GENERAL OF POLICE N.W.F.P.

To Constable Rahmat Vllah No. 101

Son of

District Bannu

... in Recognition of

Passed 69th advance traffic course in the 2nd position

Rupees 200/-

Inspector General of Police, N.W.F.P.



## COMMENDATION CERTIFICATE

CLASS III Granted by

( p. s. p) MIN YASIR AFRIDI

DISTRICT POLICE OFFICER BANNU

To Rahmat Ullah Suo (Cihorinala)

Son of\_\_\_\_

Bannu District \_\_\_\_

in Recognition of

Mira Khel

0B. no. 148

Dated. 93 102 12020

District Police Officer

منان المالية عنى منان المالية Jul God with the manufacture of the second of the se مة يدمند وعنوان بالاس ابن الرفسسة واسط بروى وجراب دميي وكل كاروا كم متعلفة كل بقام لهذا در كيسك الماس خان سرون الديميط الي كورك كوديل لفررك إفاركيا جاء ي كرما ب تمويتوف كومقديس ككركارواتي كاكابل ابنة يارسجكا ينبروكيل صاحب كوكمرني داحني المروك وتنوتنالت وتنيها برطف يين جوار ويهي اوراق ال دعوى اورايمنور الأري كرني الراء اور وسولي جيك وروبيه اور برطي دعوى اور درخوا سوت روتهم کی تقدیق اوران میرکتر تخط کرانه کها اختیار میگارنیز لیمورز عدم بیروی یا داگری میطوفیریا ایل کی برامارگی ر را می سدین مید در در این میران در نظرانی و بروی کرنے کا اختیار برطا اور بھورت فرورت مقدرت مقدرت مقدرت مقدرت مقدرت مقدرت مقدرت كُلُ يَا بُرُونَ كُنْ بِدَالًى سِنَةِ وَلِسُلِمَ إِن وَكُمِلَ يَا تُنَارَقًا لُونَ كُو لِيَهِ بَرُاهُ يَا اِن كِمَا لَ تَعْرَرُا الْمُنَارِيُّ الْمُ ا درهاه بمقرش کردی و ی جاره کرده بالا اختیارت مامل بون شیم ا دراس کا ساخته برف خته منظور تبول بيخيكا و دوران مقدم بي جوخرجيه و برجانه النوا بمندام كي مسبب سينهوا ال كاستحق و كيل الساحب مرية وفي مرك ألك أنيز بقايا وفرت بي وصول مرند كالبحى اختيار بيكا أكر كوني ناريخ ببيتي مقام روره ير به يا مدس المر به الووكل صاحب يا بند نه بهول كي كه بيروي مذكور كري لہٰذا دکالت نامہ دکھ دیا کہ سنر سے۔ De Maria Law 1

## BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

#### Appeal No.16434/2020

Rahmat Ullah Khan s/o abdul Ghaffar	,
R/o Adam Zai, Lakki Marwat,	

Ex-SI/SHO, Police Station Domel Bannu .....

Appellant

#### <u>Versus</u>

The Regional Police Officer, Bannu Region, Bannu and others ........... Respondents

#### <u>INDEX</u>

S/No	Description of Documents	Annexure	Page
1	Comments/Reply		1-3
2	Affidavit		4
3	Authority Letter		5
4	,		
5			

DEPONENT

11101-1483421-1

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNA

**PESHAWAR** 

Appeal No.16434/2020

Rahmat Ullah Khan s/o abdul Ghaffar, R/o Adam Zai, Lakki Marwat,

Ex-SI/SHO, Police Station Domel Bannu .....

Diary No. 19
Dated 23/06

Dated 23/06

Diary No. 19
Dated 23/06

Appetion:

#### <u>Versus</u>

The Regional Police Officer, Bannu Region, Bannu and others ........... Respondents

#### PARA WISE COMMENTS/REPLY BY RESPONDENTS NO.1, 2 & 3

Respectfully Sheweth

#### Preliminary Objections

- 1. That the appeal of the appellant is barred by law & limitation.
- 2. That the appeal is not maintainable in its present form.
- 3. That the appellant has concealed the actual facts from this Honorable Tribunal.
- 4. That the appeal is bad in law due to mis-joinder and non-joinder of necessary parties.
- 5. That the appellant has approached the Honorable Tribunal with unclean hands.
- 6. That the appellant has got no cause of action and locus-standi to file the instant appeal.
- 7. That the appellant has been estopped by his own conduct.

#### **OBJECTIONS ON FACTS:**

- 1. Pertains to record. service record of appellant, needs no comments.
- 2. Pertains to record. Hence, needs no comments.
- 3. Pertains to record. Reply of appellant was found unsatisfactory and unplausible.
- 4. Incorrect. The appellant while posted as SHO Police Station Domel, had weak command in his area of responsibility, showed laxity and inefficiency in official work and cultivated relations with drug peddlers and proclaim offenders. On the basis of the allegations, proper charge sheet with statement of allegations were provided to the appellant. For the purpose of scrutinizing the conduct of the said accused official with reference to the above-

mentioned allegations leveled against the appellant, DSP Head Quarter Bannu was appointed as Inquiry Officer. The inquiry officer submitted finding report and reported that in the light of the departmental inquiry proceedings, the allegations leveled against the said SI Rahmat Ullah has been proved. Resultantly he was awarded major punishment of Dismissal from service by Respondent No.1.

- 5. Correct. Hence, needs no comments.
- 6. Correct to the extent that the appellant submitted presentation before the Respondent No.2 for reinstatement but he badly failed to rebut the allegations leveled against him. Therefore, the presentation was turned down by the appellate authority.
- 7. Pertains to record. Hence, needs no comments.
- 8. Incorrect. Proper reply has already been given in para No.4.
- 9. Pertains to record. Hence, needs no comments.

#### **OBJECTIONS ON GROUNDS**

- a. Incorrect. For the purpose of scrutinizing the conduct of the said accused with reference to the allegations leveled against the appellant, DSP Head Quarter Bannu was appointed as Inquiry Officer. The inquiry officer submitted finding report and reported that in the light of the departmental inquiry proceedings, the allegations leveled against the appellant has been proved. major punishment of Dismissal from service was awarded by competent authority.
- b. Incorrect. Proper charge sheet with statement of allegations were given to the appellant but he badly failed to rebut the allegations and the changes were established during probe by enquiry officer.
- c. Incorrect. Reply has already been in Para "A".
- d. Incorrect. The I.O conducted impartial inquiry, submitted finding report wherein he proved the allegations leveled against the said SI Rahmat Ullah as true.
- e. Reply has already been given in the above para.
- f. Incorrect. There is no malafide on the part of respondent but due to involvement of the appellant in illegal activity, was awarded major punishment of dismissal from service.

- g. Incorrect, lodging of FIRs was the duty of appellant but on the other side has had made nexus with drug peddlers and Pos which shows gross in efficiency of appellant.
- h. Incorrect. There is no malafide intentions on the part of the Respondents. He was dismissed from service on the basis of the impartial inquiry conducted by DSP Head Quarter Bannu. The I.O conducted impartial inquiry, submitted finding report wherein the allegations leveled against the appellant was established.
- i. Incorrect. The order issued by the Respondent No.1 is quite legal and in accordance with law/rules and facts.

The Respondents department may kindly be allowed to advance any other grounds & material proof at the time of arguments.

#### PRAYER:

In view of the above replies, it is most humbly prayed that the appeal of the appellant being devoid of legal force, may kindly be dismissed with cost please.

District Police Officer,

Bannu / (Respondent/No.1)

Regional Police Officer, Bannu Region, Bannu (Respondent No.2)

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar (Respondent No.3)

## BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

#### Appeal No.16434/2020

Rahmat Ullah Khan s/o abdul Ghaffar,		
R/o Adam Zai, Lakki Marwat,		
Ex-SI/SHO, Police Station Domel Bannu	***************************************	Appellant

#### <u>Versus</u>

The Regional Police Officer, Bannu Region, Bannu and others ......... Respondents

#### <u>AFFIDAVIT</u>

I, Muhammad Farooq Khan, DSP Legal representative for Respondent Nos. 1, 2, & 3, do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by me are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

DEPONENT

11101-1483421-1



## BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

#### Appeal No.16434/2020

Rahmat Ullah Khan s/o abdul Ghaffar,		-
R/o Adam Zai, Lakki Marwat,	•	
Ex-SI/SHO, Police Station Domel Bannu	***************************************	Appellant

#### <u>Versus</u>

The Regional Police Officer, Bannu Region, Bannu and others ...... Respondents

#### AUTHORITY LETTER.

Mr. Muhammad Farooq Khan, DSP Legal is hereby authorized to appear before The Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of the undersigned in the above cited case.

He is authorized to submit and sign all documents pertaining to the present appeal.

District Police Officer,

Bannu

(Respondent No/1)

Regional Police Officer, Bannu Region Bannu (Respondent No.2)

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar (Respondent No.3)

#### BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 16434/2020

Rehmat Ullah

versus

**B**PO & Others

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#### REJOINDER

#### Respectfully Sheweth,

#### **PRELIMINARY OBJECTION**

All the 07 Preliminary Objections are illegal and incorrect. No reason in support of the same is ever given as to why the appeal is barred by law, limitation, not maintainable, concealment of facts, mis and non-joinder of parties, unclean hands, without cause of action, locus standi and estoppel.

#### ON FACTS

- 1-3. Admitted correct by the respondents regarding Appointment, promotion, Charge Sheet and its reply. As for as reply was found unsatisfactory and un-plausible is concerned, neither law or the police department or any other department of the Government has fixed standard of satisfaction and plausibility.
  - 4. Not correct. Enquiry was not conducted in the matter as per the mandate of law, while on the other hand, the Inquiry Officer has stated in the enquiry report that none gave any statement regarding involvement of appellant with peddlers / proclaimed offenders. Secret enquiry is not permissible under the law. The major penalty imposed upon appellant is illegal and void.
  - 5. Admitted correct regarding dismissal of appellant from service by the respondents.
  - 6. Admitted correct to the extent of representation and has rebutted the allegations with cogent reason leveled against him. Rejection order on representation is not supported by cogent reasons.

7-9. Admitted correct by the respondents. Reply in para 04 above is reiterated.

#### **GROUNDS**:

- a. Not correct. The ground of the appeal is correct. The Inquiry Officer during enquiry proceedings admitted the fact that none gave any statement regarding involvement of appellant in the allegation. Heresy evidence is not admissible under the law against anyone.
- b. Not correct. Mere service of Charge Sheet and leveling allegation are not sufficient unless and until proved in the enquiry proceedings. All the allegations were rebutted with cogent reason by the appellant.
- c. Not correct. Reply as per para "A" above of the replication.
- d. Not correct. Secret enquiry or heresy evidence has no legal value in the eyes of law.
- e. Not correct. Recommendation of Inquiry Officer were not based on any proof.
- f. Not correct. The ground of the appeal is correct regarding none service of Final Show Cause Notice and personal hearing, being mandatory.
- g. Not correct. Dozens of FIRs speaks the efficiency of appellant.
- h. Totally false and absolutely incorrect. The ground of the appeal is not replied by the respondents to its contents regarding personal use of vehicle by the authority, being case property.
- i. Not correct. The ground of the appeal is correct regarding none conduct of enquiry as per the mandate of law, affording of opportunity of cross examination, etc.

It is, therefore, most humbly prayed that the appeal be accepted as prayed for.

Appellant

Through

Saadullah Khan Marwat

Advocate,

#### **AFFIDAVIT**

Dated: 06-07-2021

I, Rehmat Ullah appellant do hereby solemnly affirm and declare that contents of the **Appeal** & **rejoinder** are true and correct to the best of my knowledge and belief while that of reply of respondents are illegal and incorrect.

I reaffirm the same on oath once again to be true and correct as per the available record.

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DEPONENT



#### KHYBER PAKHTUNKWA

#### SERVICE TRIBUNAL, PESHAWAR

s. **۶۰۰۶** ا

Dated: 11//6 /2021

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

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

To

The District Police Officer, Government of Khyber Pakhtulnkhwa, Bannu.

Subject:

JUDGMENT IN APPEAL NO. 16434/2020, MR. REHMAT ULLAH KHAN.

I am directed to forward herewith a certified copy of Judgement dated 17.09.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

**PESHAWAR**