-14.01.2016

None present for appellant. Mr. Muhammad Zubair, Sr. GP for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply on 7.4.2016 before S.B at Camp Court Swat.

Camp Court Swat

07,04.2016

None present for the appellant. Mr. Muhammad Zubair, Sr.GP for the respondents present. Application for withdrawal of the appeal already submitted by the appellant. In the light of the said application, the appeal is dismissed as withdrawn. File be consigned to the record room.

hairman p court, Swat, ,.04.16

ANNOUNCED 07.04.2016

12.08.2015

З

Security & Process Fee

Appellant Deposited

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as S.I when subjected to inquiry on the allegations of misappropriation of two bags Potassium Chloride and vide impugned order dated 23.4.2015 compulsorily retired from service regarding which he preferred departmental appeal on 29.4.2015 which was rejected on 25.6.2015 but communicated to the appellant in 14.7.2015 and hence the instant service appeal on 27.7.2015.

That neither any regular inquiry was conducted nor opportunity of hearing was afforded to the appellant in the prescribed manners and that the appellant was punished under Police Rules, 1975 as well as E&D Rules, 2011 and that too by DPO who was not even competent to pass any penalty against the appellant being S.I.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 2.11.2015 before S.B at Camp Court Swat as the matter pertains to the territorial limits of Malakand Division.

2.11.2015

Appellant in person and Mr. Muhammad Zubair, Sr.G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 14.01.2016 before S.B at Camp Court Swat.

Cha Camp Court Swat

Form- A

FORM OF ORDER SHEET

Court of___

Case No._

.

890 /2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate			
1	2	3			
1	07.08.2015	The appeal of Mr. Said Mahmood resubmitted today by			
-		Mr. Khaled Rehman Advocate may be entered in the Institution			
		register and put up to the Worthy Chairman for proper order.			
		REGISTRAR			
2	10-8-15	This case is entrusted to S. Bench for preliminary hearing to be put up thereon $13 - 3 - 15$			
		CHARMAN			
	· .				
	· ·				
	* 、				
	· · ·				

The appeal of Mr. Rasheed Ahmad son of Shams-ul-Haq GPS Taj Muhammad Kali Mohmand Agency received to-day i.e. on 27.07.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-L of the appeal is illegible which may be replaced by legible/better one.
- 2- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No: 104 /S.T. Dt. 2015

REGISTRAR

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Khaled Rehman Adv. Pesh.

Apartal Su Objectionable pape has replaced to lighte one 2) Fine apreis have been Submittee?

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. <u>890</u>/2015

Said Mahmood		T
	· Versus	
Appellant		

18

The PPO and others

. .

.....Respondents

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3.	Naqal Madd		В	0-10
4.	Suspension order	10.03.2015	С	0-11
5.	Charge Sheet and Statement of Allegations		D	12-13
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Through

Appellan Khaled Rahman

Advocate, Supreme Court of Pakistan 3-D, Haroon Mansion, Khyber Bazar, Peshawar Cell # 0345-9337312

Dated: ____/ 07/ 2015

K BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. <u>890</u> /2015

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.

G.W.P Province Service Tribunal Derv No.

1

- Deputy Inspector General of Police, Malakand Region at Saidu Sharif Swat.
- 3. The District Police Officer, District Shangla......*Respondents*

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 23.04.2015 WHEREBY THE APPELLANT WAS IMPOSED UPON THE MAJOR PENALTY OF COMPULSORY RETIREMENT AGAINST WHICH HE PREFERRED DEPARTMENTAL APPEAL TO RESPONDENT NO.2 ON 29.04.2015 BUT THE SAME WAS DISMISSED ON 25.06.2015 AND COMMUNICATED ON 14.07.2015.

PRAYER:

On acceptance of the instant appeal, the impugned appellate order dated 23.04.2015 passed by Respondent No.3 and the impugned appellate order dated 25.06.2015 passed by Respondent No.2 may graciously be set aside and appellant be re-instated into service with all back benefits.

as-submitted to-day



Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

That appellant joined the service of Police Force on 01.05.1993 as a Constable and later on promoted as Assistant Sub-Inspector and then Sub-Inspector by dint of his efficient performance of duties. Since his appointment, appellant has been performing his duties to the entire satisfaction of his high-ups.

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2. That on 05.03.2015 appellant recovered Potassium Chloride in 03 bags weighing 150kg from Mazda Truck bearing No.3960/RPT and registered F.I.R No.18 dated 05.03.2015 (Annex:-A), the accused/Driver was arrested on the spot. The case was handed over to the Investigation Branch for further investigation. On the following day, appellant was informed that during interrogation, the accused/Driver produced Bilty No. 198 showing the commodity as *Khusrang* issued from Adda Jeeway Shah Dhola, Faisalabad to Adda Chilas Rawalpindi in the name of one Gul Khan Shopkeeper resident of Dubair. Accordingly directions were issued vide Nagal Madd (Annex:-B) to include Gul Khan Shopkeeper and owners of the Addas concerned in the investigation. This direction subsequently became the cause of a false allegation against the appellant.

That vide order dated 10.03.2015 (*Annex:-C*) appellant was suspended and was issued Charge Sheet and Statement of Allegations (*Annex:-D*) alleging therein that the bags of Potassium Chloride were 05 instead of 03 and that the remaining 02 bags weighing 100kg were sold to one Ajab Khan for Rs.50000/-.

4. That since the charge was ill-founded, malafide, therefore, appellant submitted a reply thereto (*Annex:-E*) whereby denying the charge in toto and explained his position. The reply

to the Charge Sheet may be considered as an integral part of this appeal.

- 5. That thereafter an irregular, unlawful inquiry was conducted by the Inquiry Officer who recorded the statements (*Annex:-F*) of persons in absence of the appellant and also crossed-questioned them and then submitted Report (*Annex:-G*) recommending major penalty for the appellant.
- 6. That thereafter a Final Show Cause Notice (*Annex:-H*) was served upon the appellant which was also replied (*Annex:-I*) in detail by the appellant and thereby clarifying his position. The reply to the Show Cause Notice may also be considered as an integral part of this appeal.
- 7. That vide impugned order dated 23.04.2015 (*Annex:-J*) passed by Respondent No.3, the appellant was imposed upon the major penalty of compulsory retirement under the Khyber Pakhtunkhwa Efficiency and Discipline Rules-1973 (amended in 2011) and Police Rules-1975.
- 8. That the impugned order ibid was challenged through departmental appeal (*Annex:-K*) on 29.04.2015 before Respondent No.2 but the same was rejected vide impugned appellate order dated 25.06.2015 (*Annex:-L*) communicated on 14.07.2015. Hence this appeal inter-alia on the following grounds:-

Grounds:

A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article
4 of the Constitution of Islamic Republic of Pakistan, 1973 and

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unlawfully issued the impugned orders, which are unjust, unfair and hence not sustainable in the eye of law.

B. That it is a settled legal principle that where major penalty is proposed then only a regular enquiry is to be conducted wherein the accused must be associated with all stages of the enquiry including the collecting of oral and documentary evidence in his presence and he must be confronted to the same and must be afforded an opportunity of cross-examining the witnesses. In the case in hand an illegal inquiry was conducted against the required procedure and appellant was illegally found guilty without any cogent and reliable evidence. Thus the impugned enquiry being irregular and the impugned orders based thereupon are nullity in the eye of law and hence liable to be set aside.

C. That the controversy was indeed factual in nature and the same could only be resolved by holding a regular enquiry. It is also a settled legal principle that in such eventuality where factual controversy is involved then only alternative left with the competent authority is to hold a regular enquiry into the allegations. Since no such enquiry had been contemplated, therefore, the direct and abrupt conclusion arrived at by the Enquiry Officer is ill-founded and therefore not maintainable.

D. That meaningful opportunity of personal hearing was not afforded to appellant neither by the competent authority nor by the appellate authority which are the mandatory requirements of law. Thus appellant was condemned unheard as the action has been taken at the back of the appellant which is against the principle of natural justice. That the appellant was also not provided any meaningful opportunity of defence rather the Inquiry Officer adopted a pick and choose method and where the statement constituting the defence of the appellant was available, the same was deliberately not recorded. The available witnesses were crossexamined by the Inquiry Officer in such a way which reflects his pre-determination to find/prove the appellant guilty of the charge at any rate. Thus the appellant was deprived of fair trial in violation of Article-10A of the Constitution of the Islamic Republic of Pakistan-1973.

E.

- F. That Respondent No.3 is not the competent authority in the case of Sub-Inspector under the Police Rules-1975 nor under the Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules-2011 under which purportedly the impugned order has been passed. Thus the impugned order is coram-non-judice, without lawful authority, without jurisdiction and hence not sustainable in the eye of law.
- G. That the competent authority has imposed the major penalty of compulsory retirement by applying two different laws i.e. the Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules-2011 and the Police Rules-1975 which is illegal. As the competent authority was not sure of the law under which he was to proceed against the appellant, therefore, the impugned order is void ab-initio, unwarranted and not sustainable in the eye of law as the two laws have separate and distinct modus operandi.
- H. That all along the appellant performed his duty honestly. The proof of which is that during the long service record never even once the appellant was blamed for anything illegal nor any charge whatsoever was leveled against him during the period of

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his service. The subject Check-Post at Shangla is an international passage where an illegal trade of unlawful transportation was being carried on since long and it was for that reason that keeping in view the integrity, honesty of the appellant he was posted in the same Police Station so as to stop the illegal business due to which the local Mafia having farreaching hands were deprived of million of rupees, therefore, under a well-engineered conspiracy, the appellant was framed in the instant case and thus removed from the way. After the recovery of the contraband, appellant was offered Rs.300,000/for which there was also a witness with the appellant but it was refused so how could the appellant prefer contraband of Rs.50000/- over the huge cash amount. The appellant could produce the witness to the fact but no opportunity of defence was provided.

That the appellant has served the Department for more than 22 years and has consumed his precious life in the service. Moreover, during the days of militancy appellant rendered unprecedental sacrifices by arresting Suicide Bombers, removing many Anti-State elements and recovering huge amount of explosives and in recognition thereof appellant was granted Appreciation Certificates (*Annex:-M*) by the Military high-ups and he has also been awarded Commendation Certificates (*Annex:-N*) by the Department and keeping in view his longstanding extraordinary service record, imposition of the major penalty in peculiar facts and circumstances of the case is harsh, excessive and does not commensurate with the guilt of the appellant. It is also added here that due to the previous actions against the Taliban even now there are threats to the life of the appellant.

I.

That the statement of Inquiry Officer recorded by the Inquiry Officer is confined only to the factum of Bilties No.198 & 199 but the disputed Bilty No.199 has not been recovered till date which confirms the fact that the alleged contraband alonwith the Bilty No.199 was unloaded before the interception of the vehicle and the possibility cannot be ruled out that in fact the owner of Bilty No.199 unloaded the contraband before its destination and then passed off the information to the Police so that the owner of Bilty No.198 a business rival be apprehended.

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K. That as far as the other incriminating statements of Gulab Sher Driver is concerned, it may be submitted that he is co-villager of the appellant and was a leader of Taliban Group and known by the name as Qari Sahib during the days of Talibanization. Being a ring leader of Taliban he caused much damage to the state institutions. Since the appellant was well-aware of his background, therefore, he was kept under close watch. Earlier he had applied for appointment against the post of SPO but due to the appellant's intervention he could not be appointed, however, he subsequently managed his appointment after the transfer of the appellant. Appellant also brought into the notice of Respondent No.3 the antecedents of Mr. Gulab Sher and it was because of this animosity that he unlawfully deposed against the appellant.

That the disputed Bilty No.199 shows the commodity as *Khushrang*. In absence of the contraband or any other evidence that Bilty No.199 was relating to the item of contraband, the charge against the appellant cannot be established. Moreover, except the two witnesses i.e. the Investigating Officer and Gulab Sher Driver all other supported the stance of the appellant particularly the witnesses of the Recovery Memo of the contraband but their statements were discarded for

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unjustified reasons.

- M. That at the last appellant will swear by placing his hands on the Holy Qur'aan before the Hon'ble Tribunal in the name of Almighty Allah that he is not involved in any manner whatsoever in the misappropriation of the case property as alleged against him.
- N. That appellant would like to offer some other additional grounds during the course of arguments when the stance of the Respondents is known to the appellant.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Through

Appellant Khaled Rahman, XXIII

8

Khaled Rahman, All C Advocate, Supreme Court of Pakistan

Dated: ____/ 07/2015

MOB: 0312 500 4567 *. NC NOF 13101-8943519-3 كرزست پېرلى پنادر ماب بسر 13/2286 قارم شور بىغداد ^يك بزارد جىز زىموند 20.06.2011 يۇر (قارم شور جايز) مىنجىلۇرم (يېزىر) مىن مەكىم مىن كى مەكىم مەكرا مەكىم مەكرا مەكر (يۇر مەكىم مەكرا مەكر () ... بيترحد فارم نمبرا م مع مدرم ما ا**بتدائی اطلاعی ریورٹ** تحری^ے مرصل حقایتی الحلوان جی کوشہ ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیرد نعہ ۱۵۴ مجموعہ ضابط نو جداری ا متاسكم وروران ₇₅رىزى الم وت وقد :- حقة وت astrangen 18 k 500 5 10 18:30 015 - 500 5 10 5 00 15:00 تاريخ ووقت ربورك SO Wight نام دسکونت اطلاع د ہندہمستنغیث 5 EXPISUE ACT 5 فنفر کیفیت جرم (معہ دفعہ) حال اگر پچھ لیا گیا ہو۔ دود الملك برام ح درى باعل م مور جام م مر الم جائے دتوعہ فاصلہ تھانہ سے اورسمت ملى كنه عاسيان والخام ميرو حمر ماج اين ال نام دسکونت ملزم بررسروي المسلم فتره ما عم سراي کاردائی جومنیش کے متعلق کی کٹی اگراطلاع درج کرنے میں توقف ہوا ہوتو دجہ بیان کرو الم مسبل دار تھانہ ہےروائل کی تاریخ ودقت بل رفیق الله اللح موسول مومیتن دیل به محدمت الحسد الجارج ماند دندی امین مسلم منهاد سید مرد بن رفیق الله اللح موسول مومیتن دیل به محدمت الحسد الجارج ماند دندی امن میں مودیگر لذی لولیس منبع سرج ایریش لوقت میام بالا مرور دقام بازب تعاکو طب سے از محافظ معند از میں 1965 اللم مراکب سید تر تا میں تلا منبع سرج ایریش لوقت میام بالا مرور دقام بازب تعاکو طب سے از محافظ معند از میں 100 مراکب سید تر تا میں تلا منبع سرج ایریش لوقت میام بالا مرور دقام بازب تعاکو طب سے از محافظ معند میں مودیکر لذی لولیس دولان مل منبع سرج ایریش لوقت میں مراکب میں دیل میں اول مام دوران تلا میں مراکب معد تر تا میں ترا میں محفظ معاد مرد مرکب محفظ محفظ میں دولی میں دولی مرد مان مرد ماری معاد میں مردک میں معد تر ما میں میں مرد مردک معاد مرد مرد مرد مرد محفظ محفظ معاد میں دولی میں دولی خاص مردک مردک مردک معند از مان مرد مردک محفظ معاد مرد محفظ محفظ محفظ محفظ محفظ محفظ محفظ مرد ماری محفظ محفظ میں مردک محفظ میں مردک محفظ میں مردک م د المركم معنى معد كوروم مكر مسرميس على دها العير داد مدم مالات الم عالية مذا الم وقد م مسم الأسنس ، مرمت دغره بسين ، مرسط مرار متنا سن مت مراد مرام فواسم مدر في بارسل مرا تا ع علمه، المرف فرية عمة تعاة مرار مورى وزف 980 49 كلومرام مرمير مدار والمعسم عوريد (دها) خير دواد تدر موطور وتو مرمر فرد تعد لول مى الدم كوم الم حرم بالا بالحر فس ما له وتناركر برارم افزم مدسة معتبل رنف وقد حركى ارسار تما : - والوسى سن ساف كوطاور تغشش ما حاف عراسة مرابعر دستواند مرى مد في معدد مورج ورج و محددانى معازين أدو مراسل وف در ج عدر سوم مرج مالا ما مرك المر الأروسليس سلاف من عامل من المرج ووزاج المود الروز الروز الروز الرا معماد " مدور تروم جانبة اعلى مولم مع تم مرجر مرد لنسب والم رحان الله بالا كران مالاكر الحالجان مر فرز زر مر دهمول ا MHK Populai Attested to be True Copy

(in the dellas & (in the not Willie alle 1/5 JP co (406/53 co & 21100 (475HC (622 W SV)). مرتب مرتباعی بالالوم را ترجب منا می رو من مع معراب ۲۲ دوران appendent and the sould all and the sould be file ATSile We du ano chi de l'élende l'élende Stand In and Stand Stand Stand Contraction of the Martin Stand in a cost in the start subaction of the start of the star En lo che stand al and al con of the stand o Miles and a strange of the strange o 1 (1.1/0 (or lies was sole 0)? -(i) is a line of the state of t 19 Sinvarde Coste con Droch dig e 5.2.5. · est hater えぶ 36,5 % a U B (Stand of B) (J-\$ 1 E-11) 5.19 1015 (J. a render in fil Servine 3 cell, 2 cell no 6: 20 CO GUNILOJA CS . 645 V/U. e Marco ches Attesteri to be True Copy

11 ORDER ANNE+ SI Said Mahmood closed to Police lines vide this office OB No.. 33 dated 09.03.2015 is hereby suspended with immediate effect and until further order. MA bistrict Police Officer. Shangla OB NO 34 Dated 10/3/2015 No. 8137/E, Dated Alpuri the 10 - 3 /2015 for kind information w/r this endst: No. 2079/E, dated 09.03.2015 please District Police Officer. Shangla sted to be frue Copy

12 ARGE SHEET

I <u>Faisal Shahzad (PSP)</u>, District Police Officer. Shangla as competent authority, hereby charge you SI <u>Said Mahmood</u> while posted as <u>SIIO at Police Station Dandai</u> as follow;-

You SI Said Mahmood while posted as SHO at Police Station Dandai have recovered 3 bags of potassium chloride total 150 Kgs during search and strike operation from the disposal of Muhammad Faheem s/o Nawab Ali r/o Abasian@O Beroot Tchsil and District Abbottabad and lodged FIR vide No. 18 dated 05.03.2015 u/s 5-Exp: Sub Act at Police Station Dandai. Later on it has been noticed through reliable sources that the actual bags of the potassium chloride were 05 instead of 03 and the remaining 02 bags of potassium chloride has been sale yourself amounting to Rs. 25000/- each to one Aich Khan r/o Thakot District Batagram who is a dealer of such kind explosive. Your this act gross misconduct/negligence on your part, which rendering you liable to be proceeded against departmentally.

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

130.00 a.

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Dated 10/03 12015

(FA SAL SHAHZAD) PSP District Police Officer. Shangla

texted to E rue Cop

I' <u>Faisal Shahzad (PSP)</u>, District Police Officer, Shangla as competent authority, hereby charge you SI <u>Said Mahmood</u> while posted as <u>SHO at Police Station Dandai</u> as follow;-

ARGE SHEET

12

ŃО.

Dated 10/03 12015

You SI Saidi Mahmood while posted as SHQ at Police Station Dandai have recovered 3 bags of potassium achloride total 150 Kgs during search and strike operation from the disposal of Muhathmad Faheem s/o Nawab Ali r/o Abasian@P-O Beroot Tehsil and District Abbottabad and lodged FIR vide No. 18 dated 05.03.2015 u/s 5-Exp: Sub Act at Police Station Dandai. Later on it has been noticed through reliable sources that the actual bags of the potassium chloride were 05 instead of 03 and the remaining 02 bags of potassium chloride has been sale yourself amounting to Rs. 25000/- each to one Ait-b Khan r/o Thakot District Batagram who is a dealer of such kind explosive. Your this act gross misconduct/negligence on your part, which rendering you liable to be proceeded against departmentally.

- By reasons of the above, you appear to be guilty of misconduct and have rendere i yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Rules, 1975.
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- 4. Your written reply, if any, should reach the Enquiry Officer 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.

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

6. A statement of allegations is enclosed

(FA(SAL SHAHZAD) PSP District Police Officer. Shanela

DISCIPLINARY ACTION

I Faisal Shahzad (PS), District Police Officer, Shangan authority, is of the opinion that SI Said Mahmood while posted as Station Dandai have rendered yourself liable to be proceeded departmentally as you have committed the following acts/omission as defined Rule-2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATIONS

That it has been reported against you that you while posted in <u>Police Static</u> <u>Dandai</u> committed the following act/acts which is/are gross misconduct on you part as defined in Rule-2 (iii) of Police Rules 1975

You SI Said Mahmood while posted as SHO at Police Station Dandai have recovered 3 bags of potassium chloride total 150 Kgs during search and strike operation from the dispesal of Muhammad Faheem s/o Navab Ali r/o Abasian P.O Beroot Tehsil and District Abbottabad and lodged FIR vide No. 18 dated 05.03.2015 u/s 5-Exp: Sub Act at Police Station Dandai. Later on it has been noticed through reliable sources that the actual bags of the potassium chloride were 05 instead of 03 and the remaining 02 bags of potassium chloride has been sale yourself amounting to Rs. 25000/- each to one Ajab Khan r/o Thakot District Batagram who is a dealer of such kind explosive. Your this act gross misconduct/negligence on your part, which rendering you liable to be proceeded against departmentally.

2. For the purpose of scrutinizing the conduct of said officer with reference to the above allegations <u>Mr. Bakht Zada Khan, SP Investigation Shangla</u> is happointed as Enquiry Officer.

The Enquiry Officer shall conduct proceedings in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defence and "hearing to the accused officer, record its findings and make within twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.

4. The accused officer shall join the proceeding on the date, time and place fixed by the Enquiry Officer. $\Lambda I C$

(FA[ISAL SITATIZAD) PSP. District Police Officer.

. Shangla

OFFICE OF THE DISTRICT POLICE OFFICER, SHANGLA

/E. Dated Alpuri the 10 - 03Copy of above is sent to:

The Regional Police Officer. Malakand at Swat for kind information wir to this office endst: No. 2137/E, dated 10.03.2015 please.

The Enquiry Officer for initiating proceeding against the accused officer namely

ttestes to be

ug/Copy

Concerned defaulter officer.

Site

(FAISAL SHAHZAD) PSP District Police Officer. Shangla

بحوالم جارا سربى طبر ع/41-2139 مورض <u>330 ما جارت</u> 14 هنان opo ماحسنا التحم معدوض خدد بون ; من تحنيشة 22 سال من فنكم لوليس من أمني دلوط تهامت جان 10,01-Unit, 5, 61- Ester EV, vile, Milie ANNER بى ميں جب ميں جست مرك حصار دندنى تعينات تدا-موض 30 کرد میں دیدی بل کر دیں جس حس مرتب المراجع والمراجع والمراجع والمراجع والمراجع المراجع دوران جانب شکر سے ایک منرد کند RPT3960 کو د شدد آكر منكوك وإن كرووا بالرحسب جالي لاشي ل بر حدد اندر سے مثبن ہوری حسن میں سرائی اور کار Jibe for all roles in a gord wing بحسبت علوتر سالية مي حول الأراطوتر المرد حيائر تتميز وارتوا كوراعير مردمه بالمر مرفح وعدي لاليل عيدي والبور 15/03 in 18 len ie ili 10/00 in 10/00 is costilled a - a Whome Stap Sub Act موجود بلوليس المسران في حوجو در من من كالي الح and 10/03/015 - 1 wind in a and is a all a المع بالكام في مالي مرالي من المن المي الما باغلط/سمال بخ ترا حد سترد د «ما م خین دو رد میں س د ولبرمان سلع تعصد وجه فرحت کدا سے - اور اس مار میں انگرائری جناب ۲۷ حک الوسلی میں و دار ایک میں صاب والا ا هی خلان کم علی کم می الزا مات مناطق اور به سیاد سر) حس نے مہمتیہ این ڈیوٹی حالفہ ن سے دائر دیں رہے کہ بنا دیکے سے ارر لیوری سروس نے دوران فی مان منظم نسب اور ا ركرومكار كاصال ركداي -Attested to be True Copy

2) 15) طليرا، يدين طلات مين، مين ابن طن في مواد مي لي صاس مقامات برديونى وي من من روران مين من طالمان كما نذم جبب التدول في خطاب سميت كن د هشت رور بر محرفتاری من کالف میں اربی منطق سے Alash mine كما جاكراب معول كارمد تريس الراسي المراسي المراحين محت سير تركس الفسي المرياكية اراي كم يفي سي سي في لله بی حظے میں جو رکھ کار ڈیر المیں ۔ حیثی اس کاس ڈیوٹی ریا سب کے لیے۔ ان میں سے اور کس خوبھی نور نے غیر مانونی ریا میں نہیں دی سے اور کس ان میں دوران سروسی میں نے جب کار کردئی کی سے استعاد کر از لعرض ولاحظراف من -ارز وقوع بسمول خبر حال کنی دوست لوگول کی كالزن كاروان مزديني ستارش ويجرز دواري رشوت مى يتكن كى يجاميكن في السفاد برهمة خلاف يهنياد الدر فتعبير على متنط بيت كالمي بي الس باري دين، ميں م الفران ي دريغان صفال من كرران -جنب بر الم المسب سانت بر الماد حساس جراف مار حیا بے نیں ارجان کوئی ۔ احب نظری ارا بر ای کر دیا شہر ای کی سیاد ہر برخہ جو بے سے میں کی خوص ے حدیث نوب کی دہلی وہ کی کر لیے اے کو ا خاراد در مرد حنا ب alaphilips al a DSP of all alipsp لورى د ابنى ايما مدارى اور، ما شدارى كا مظامرد كرت هم لوسي دروي برطري مقد مرمين دهام فيزولون اسلام نيز rtested to be Trae Copy

جرئم مرخلان غلطاد ب ساد الزامات لقاع في 16 حيل كي مي المديانيي الريدينوان المي الم المحاد المنا التي الجميم جارج شيلى ندا بلا هذي والأن Si-SAID MAHMOD POLICE LINE SHANGLA Date 15-03-2015 ttested to be True Copy

şi . 2 82-12 Por s $\hat{\gamma}$ 202 (z) 50 112,00-1 ブテ Z.S. Bon 5675 m - 212. 20 8 2 m 55 (2) 1.10o. A statement of allegations is enclosed 1,2,00 Kon 2119 80 Ŋ 11/62 E96 25 Pous Sier M 20C 1.9 7512 cy 100 0155 - 12 (2) 1/2 (2) (23 1/2) 20 21/2 / 1/2 (2) (23 1/2) 20 21/2 / 1/2 (2) / 2/2 Smh 1999 1997 1997 N) 120 w cul 5515015 J (C C رى ۲. کی کرد be At rue Copy 1221 4 1

زرعمل میں لال) کی ج جزیر در در دار من میں کان کانی تحص سر نداز د بر اطلاع پر عمل میں لالی جو خربی مارد کا در کا دلر ہے -موال مترد اس برامه کی کی آئے اس الطراب کر اس ور این طراب اطلم وزیر) می ؟ ج ر- اطلم (می این) طراب مرکع شری ای کی مرال نرد اس الملم من آ کے محسطان سا تو کی تھا برطولو (6) Jy (Mi مال المراجة ووع مع مت وقت شروم براي) - Justie 201 6 - 2 - 12. Colina i big & Competer - 1 Sillon الله المان المان المان المان المان المان المراد ا مراد المراد - Ser a stability and a for the forme

i i chor of the sol - من رود الم الى من برامرال - C Crew win will but مرن شن Cardy Lin 4 1 miles - Broge $\frac{1}{2} \frac{1}{2} \frac{1}$ Bold Silver al Sollar a Prille ج ا ا - « سای می کنر، در ارو از مان رووران - مرابق الناري المراب المال المع طالان المعرف في 1700 - 4 Conton & (3, 69 -12. un cu l'and o cu l'and - The Unit Service Attester True Copy

(20) (36 (M) in with b 2 6 1 0 2 5 - 1 - 13 con illing did no is 198 con في وي مما طراب معمل في ووفان م ٢ Respirent States Company and Alson - de la se New on Out in la Consell, is de Service Ecoloria - « blig 0, -12 مرا) نزم از مکاری کریک میں النے کر ارتحد مرار خران کر ان کر اور میں النا کر اور میں کر اور میں کر اور میں النا کے کہ اور میں النا کر اور میں النا کر اور میں النا کر اور میں کر او Store Silver A 2021/1 الم المرال عرفاط - 6 () مركار المركز في . دين دوسي محك - المراجع ولم في در على سالقراد - 63 1 Jour an ch an c 2 1 3 -steer to be - UTE

() ES & (eble 1) / () / / (2) الاند في مركار الإراك مر الل عرار ال ار گازان سرگار () برگار () یک سی خارایی ؟ ار گازان می محکاد اس کی جارای کی جا ۲۶ (میناری UNROUGESS 3 (1) 5100 (1) - E Eller Strike Strike Court Séc 119, 3(1)6 $\frac{1}{2} \frac{1}{2} \frac{1}$ - (7 () (S موال براب باعد شره دما خروا دادان کی می 5650 10-2-2 - 2 ch 23 - 12 bluf 2 leh - 2: $\frac{1}{2}$ - Chroling Con Ching Attested to be True Copy

سان از ان می قب ۵ و بر در رو او ما رو او ما رو ا ن مرد الرار فالحرف من ج سر من (اره سان من كاوركتاب من تقيياً ال 1996 من تقرير وركت بي ما كرابون - حكاند دندي دبر خكا كوط وَيَرَ وابْعَ ہے۔ دراخ <u>دوں</u> کو وی جرانس انٹر بنل اؤہ وی مذکری میں کا میں ہے۔ مزارع دن اطلب علی کردنری حداثك حسر أن عراد مركار في مرفون مرفون في مالك 2 ل در در بر بر ا - لو میں تک زنر) کر میل ک ر م ما يكم في دني ع Ho Elin في فان مالك مرد کارا) سے شن تروزے (Bags) دار قرر دا دیگ Allest 2- 21, 201 201 11 2 4110 - 2 Allest and an 25725 26 21 201 Ciels an 2 - /cilis كالأرائير حارد تيرو الواجع الماليا المالية كالرا خلاف FIR در الحا- حرب- SHO در الم در الم در الم $\leq f_1$ درائيور) خلاف برج نها بولواس ساد کرارد، نرى ج Egl ليكن ملك مالك من عام ون عام والج اب مركز ودار) مراصب معنى ب كيونم فتر النا بي من السران والمراع مج مر) ہے - مر) زرائیور فرور مے رمانی کیا کم تق f- - - - (rest - (rest - 1) / 2 2 5, 01 He Conel Sp مح لے میں - ایک در میں ناام حارث - اور حاكر ستالي الأه كر اطلم ع ما كر ف $\mathcal{C} = \mathcal{C} - \mathcal{C} = \mathcal{C} =$ 17 JP66 Competing (Day (Day) Trv⁄e (

حت مرو والحمال ساء بر در الور 401 23 (il - c (File (0)) 23) م ولي ن توري دول خرا خرا در الم الم كيونم فتدم كانزران كالعدي فك أرا فكا-ي مرا بان Ala 200 13202-1925/78-1 NIC 13202-1925/78-1 Meb: 03349551400 12 03349551400 12 035 Стория 25 9 стория 2 Сарана БНО и Стория 9 стория Сарана Сарана БНО и Стория 9 стория Сарана Сарана БНО и Стория 10 стория Сарана Сарана Стория Стория 10 стория Сарана Сарана Стория Сарана Стория 10 стория Сарана Сарана Сарана Стория Сарана Стория 10 стория Сарана Сарана Стория Стория Стория 10 стория Сарана Сарана Стория Сарана Стория 10 стория Сарана Сарана Стория Сарана Сарана Стория Сарана Сарана Стория Сарана Сарана Стория Сарана Стория Сарана Сарана Стория Сарана Стория Сарана Сарана Сарана Стория Сарана Сарана Стория Сарана Стория Сарана Стория Сарана Сарана Стория Сарана Стория Сарана Стория Сарана Стория Сарана Стория Сарана Сарана Стория Сарана Стория Сарана Сарана Стория Сарана Стория Сарана Сарана Сарана Сарана Стория Сарана С miles 2 in the miles of in the miles of the second $\frac{g}{2} \int_{-\infty}^{\infty} \int$ 260, Low (, je , je , 3 - 1 v b 3 . 1 7. Mosinelly of Services in 3. weight in the is and in the star of a comment. - 62 61 Attest to be True Copy

,¹⁵⁷ (24) الما بان ازان خرار من الله مر 568 معدر ما رس برال از اران ان ان مروح حرف الحالي در الحالي مراك المراك م سر جرفان عراد من لوس د برا) مام بران التر مرك الجرائ ولوالى مر وخرد عدا من وران جاند ونرسارد فی مزاد من مرد کی مان مرد کی از کوال کر س لن ما برا برا بخرال المع س من بورون من دوا فر مرار عرف الشر علورا سر مرا مر سرا مر سر مر الم الم الم الم الم موز الم ع مر الل موز الم وزل الا موزار فيا- فيه م محر مركز و التي مر إليم برا مريز ملك ما من مرد فرد مرد الم الرود و ع برام - c Cub Sul de 1/2 - c Cub Sub de 2 الحدميد مرير لمري في في فرواد في في جانى مۇراكى مىل كىرى كى ئاج مىرىكى بى م. امر برا- بار ار بر ار مرای می ار ا 2 314 588 N. J. 1. 580 be 51 w متعادين True Copy 03419001187

With Co up is a fin the in the (13, 11) 20 - E in 20 0 (1); ر) وعن طان سل مر \$ 05 01 409.30 Luss. C i foto po chi cuto o for 2. - les i ul suis lafe to sho ho . ?? 2 & Ell 2 jol N. 62 C. M. is here called in the contraction Austs-2 314 7SA-no trusted to the for

(A) (26) ilinian 124 reprint of 26 a) 2206, 3m (1) cil) may (20) 340 - 60 (1) محسف مرز) وجرد ها - ما نه شراب ایک مرداند (AL) 1612 RASHO - 65 / ONE 3 RPT 3860 المي و فرد م مين لور مان الم مرد الحول الم $\frac{1}{2} \frac{1}{2} \frac{1}$ بر فرفس في ويتوديد المستحيلي المرتبي المالي مدين مرير في غربي في المرتبي (join a life i l' sont a l'and a l' $= \underbrace{il_{j}}_{i} \underbrace{il_{j}}_{i} \underbrace{il_{j}}_{i} \underbrace{jl_{j}}_{i} \underbrace{jl_{j}}_{i$ Bytest dissulat_ Attested to be 20and sites True Cop 03319425946 1945

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128 سان ازان ۲۰۰ فررس شیل کمری شر مرا الا معین قط د رزی مر راف ا روا تر ر) سان که هر کهای درم) میں - کار) و باقل مر PRA 8984 کا ڈرائور سر) - «من 3-5 کو میں جب کو سن دنر) کا Juis in 20 al a la SHO UGSZU ? ابرای دارای دو جرد خا-اس در ان خانه خرام ع شاه حن والمرار ادرائي من في فرس ماري می تهریکی جس ورور ان در از طرال جر کم شاحن نے گارم کا سے ان کود کی اور قس ، برقس دولول کارای خرف سال س رس - ارتخاری میں industille alling مر، ادر ای در ای در ای مر وا در اعر س - ای در قروم) بالخص رافت كام دجام فرود وا الم الجران كاذي سال مراكر مي المرامين توتين من عن من م کارا) کل اج بور ان ات ای می معد ان من المر روز برتم) در ان ارت ارت ای عالی از ان ارت از ان ان از ان ان از ان ان از ان ان از ان از ان از ان از ان ان ا Sur all - Contraction of SA PTO) (1)6 in 19 - (12) 20 - 10 (1) (0)

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31 active Contraction 6.1.3. w P-3HT J.J. J. J. اس رق حال من قرال سارش مخص وجرها S.M.L 160,6,00- QUB, is/il She 1,23021. ed 6 it 576 062 19 3 2 2 in (in (in) 10) دولور دخان سي منظل الم Alfesta, 9 314 SRM Shapin.

32 (22)٩٠٠ مان ازان مخص ورس في رغرن من ترابي معيدها مربي ن مربات المراش سان تابح مرج cimpeter estrection la stace 53 ابركن دران برمام حمد بوس فرزن وورقا-RPT 3960 Min Main Silver Unich in the list of the list of Chine we we way to many i will be fins die of in bid ear lestor fing and the same for the service ي يول في ال معرفة الم في في في في مرد - 115 60 minus cilible 1 los al starter le signaling signal مراكح برا مر شره فرز فرا) میں رحما کر ذر وار حرفر - q Ul. 1 ~ - 63 Repr _1 MUSSIA, Miril Ener eg 3/4. 0343953668 pt > to be 03048734550 rue Copy

Cross Examination 33 ちょうしょうろうのののに 二二二 Shi 2570 (16) 3 in colo 6 6 - 2 (10 - 1- 13 - Ciclie (35)1/2:5 مرابعت وروفع تر در وقع こうちるしこうしょうこころ 540 とうショージョー آي المردي رجائي - اس في وردى دال - 63-3- 3- 3 - 3 - 6 th Site مالم الم الم الم الم الم مرد الم الم مرد الم الم من الم الل من Akc ر دارا در ای وی ته شرک کر کر کر کر کر کر - 3 (3 م موال مرام - اور بان د حواج طروا د سایان میں بیان بڑی تعین؟ -رال لمركب حينات في وها مرفل مرفل الفرالي في 5/3/10/2000 66 62 Juliants - 136102, 19 200 200 (21) 130-1-13? مراز المراج وي وي مرز المرج المراس دوران 201-6661 ac +10 an lo 10/00 -1-12 Attested to be

23 on-world Religion Child (in iles to SHO in justices in signed in 53 his grassing and a libert ي عقام حيد لوسي دين ورودي - م اس دراز SIRPT 3960 i pionis den per 1 Bicil Science (Contraction Contraction Costo ومركا كاسادة وكان سكام مام روا وع official services along of a constant and well for the show المربع المحالي المراجع المراجع المراجع المرد الم - cjuling-Gililia Attested to be 514 True Copy 50 LETT SIHC 1 Sime and 1 、 へ へ く 、 の、 総

(35) XXX S & U EE 5 Cos - 30 businest i losto 163 2 m cm Egicas - 2 - (2,2,2)-5 من و- متزو کارون در از در از با در دن ان م 2 (Ju 2005 (36, - E: 10:30 - 7 3, 10, 2) E 1, 2) Schopping Single Stand - (2 رقم محرج رف على من من دوم على طرط رف كم) - $\frac{1}{300} + \frac{1}{500} + \frac{1}$ ttested to be True Copy

241 36 (in 1il) in male 1380 4380 in an is join the ن - را فق اندایرا) سال کام ورم دو ی و « ب جن لوسن در ا) زر فر فی می اور جنا - OH م. في مع نو) في مراسي الم المن الم الم د ب رود د کا - می دیکر گارلوں) اندا کر م مسرف فا-اس مران کان سال س ان فرد ز والحاج في فرا الحا- اور دوران مراسم، دو اور ان درجاع مز دار مر مر سر کر OHS al. i د ار نو ۱) ن سان کار) میز (د و مربر که) از اطر قال لی ال می تی حسال اس ال مرسمر $\frac{1}{2}\left(\frac{1}{2}\right)\left($ سوزا او من دانس ختک ایا تو روز نامج میں ش ار Miles 2 314. Solves 4380 16 Ch !! (1) is in the 03456357949 4 L Truz Copy المراب حرب زام س درها بر در والمربو بوره كريمت مالا بجالحا ؟ - 65E5,6E9

28 137 0-26 4-1 4555 , i die Julii 10 15-معتبرهای رز ای را این (تواش بان ان ک (G, losto Lune un es en 553, 6), Uniter di elibitar (in ایرکسن هرجردی - اس دوران طاب دهار س 12 - 10 - 10 510 m & RPT 3960, 1 - 01 - 62 (in 63 (63 (m N 1) 1) 5 i جم مم المرك فرزس والم المي أن تسكوار مركو My Jen els sel - English مراع ذراع ريك فلاف هي درز ار شريخ the instance of the contraction of the à 314 ليكن على بني مزد الم كنا دها فر SAW 6- c/ u/ u/ j - c Attest of to be Phi el كَرْ إِصْلَى مُدْ كَتْتَكَ إِلَى فَرْزَ منكنة فكاخ دنرا) True Copy 03469487725 Ajil aus

1 BAR , 1 (13, 1), c) & p ULJES Store Cive Jest we had a fing wir. estorie a Cruzzor - 12 (in'; ils Altesta. R SP-W. Attested to be Sleff

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DEPARTMENTAL ENQUIRY REPORT AGAINST SUB INSPECTOR SAID

BRIEF FACTS:-

1

Brief facts leading to the enquiry in hand are, that Sub Inspector Said Mahmood while posted as SHO PS Dandai has been charged for dishonest misappropriation in case property i.e potassium chloride recovered during strike and search operation from a Truck No. 3960/RPT on the way towards District Kohistan. The delinquent Officer was served with charge sheet coupled with statement of allegation and the competent authority nominated the undersigned as the enquiry Officer in this matter of breach of trust. The undersigned examined the witnesses, other related persons and officials and the delinquent officer was given an ample opportunity of hearing him in person and cross examination. Statement of delinquent officer SI Said Mahmood was recorded in detail and the relevant record taken into possession.

SUMMARY OF ALLEGATION:-

It is alleged that SI Said Mahmood while posted as SHO Police Station Dandai, being a responsible officer had badly failed to perform his responsibility and made misappropriation in a recovered five bags of potassium chloride and showed three bags in the FIR. This act of the SHO was conveyed to the competent authority rendering him liable to proceed departmentally, so a charge sheet No.07 dated 10.03.2015 and summery of allegation No. 2139-41 dated 10-03-2015 was served on him.

BACKGROUND:-

The story behind the enquiry is, that on 05-03-2015 SI/SHO Mr. Said Mahmood, along with Police Nafri was present on check post Dandai (entrance to the District from District Battgram). It was about 10:00 am, that the Police Jawans stopped a Truck No.3960/RPT for searching goods and illegal transportation of potassium chloride (Explosive material), as the SHO was received information. Two of the bags weighing 100Kgs were recovered on the spot, which were loaded in a Police Station Mobile vehicle and the driver Muhammad Fahim r/o Abbotabad was arrested for not having legal documentation. The said Truck was taken into possession and was brought to the Police Station. Three more of the bags weighing 150 Kgs per fifty Kgs were also recovered from the Truck when that was properly searched in a Police All of the bags/Nags were fraudulently marked and written a FRANCESC COlor name i.e KHUSH RANG. Owners of the recovered handralam Zoh r/o Duhair Nala District

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Kohistan were not present with their luggage, so after post investigation the case was registered against driver Muhammad Fahim u/s 5 Exp: Sub: Act and was arrested and only three bags were shown recovered in the FIR; while the two recovered bags/Nags were misappropriated.

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During investigation of the case it was found that this explosive material (potassium chloride) consist of five bags/Nags each weighing 50 Kgs were purchased in Faisalabad and were booked from Truck stand (Adda) namely Jeway Shah Davla. Bilty No. 2433/3 is issued on the name of Gul Khan and Bilty/ receipt No. 2434/2 is issued on the name of Alam Zeb on 01-03-2015 at Faisal Abad. As the five bags/Nags have received to Chellas international goods transport company Rawalpindi, the concerned Munshi Mr. Minhajuddin r/o Jiglot has loaded the said articles in a Truck No. 3960/RPT and have issued a separate Bilty/Receipt No. 198/3 on the name of Gul Khan and No. 199/2 on the name of Alam Zeb on 03-03-2015. According to the statements of both the Adda clerks, all the five bags/Nags were properly loaded without any doubt. The Truck in question has been started for Kohistan from Rawalpindi and fifteen Nos of Bilties have been chalked for all the goods loaded in the Truck, which is evident from the challan form fixed upon the all Bilties. According to the statement of the I/O HC Rahmanullah, he was given only thirteen Bilties including challan by Muhammad Ali MHC Police Station Dandai and this is why, because the goods of one Bilty No. 200 were already unloaded in Bazzar Thakot owned by Mr. Meno Khan r/o Thakot before the recovery is made out. One of the bilty No.198 on the name of Gul Khan, the I/O has recovered from the pocket of the driver. The Bilty No. 199 issued on the name of Alam Zeb is missing and was not handed over to the I/O, which look can be deliberately removed from the other thirteen Bilties, but the delinquent officer did not think that the disputed Bilty is mentioned in the challan form. The missing/ misappropriated two bags weighing 100Kgs was of worth fifty 10 · thousand. 🕒 1

It is worth mentioning, that according to the information, after when the recovery was made and the Truck and accused were brought to the Police Station, the Police Mobile vehicle lift the station for Bazaar Thakot and both the Bags already puted in a Police Mobile were dishonestly being shifted and sold somewhere else and this was actually proved from the statement of the Driver SPO Gulab Sher No.459, that the SHO took the keys of the police mobile from him and drived out himself along with HC/DSB Shah Hassan and also did not take his Gunners with him, as well. Further stated that the disputed hassa were kent incide the Date?

Attested to be True Copy HC/DSB Shah Hassan favored verbally the statement of the driver with promise that his statement will not be brought on file, because he was the one, who delivered the secrets.

(3)

PARA A:-

Investigation of the case reveal that Mr. Gul Khan r/o Dubair Nala Kohistan was the real owner of the explosive material and he is used to supply this kind of martial for business purposes without any legal documentation. He has denied to the charges, however he was arrested but did not disclose the secrets and refused the ownership of the explosive material during interrogation. The statement of the owner of the two missing bags Mr. Alam Zeb was also recorded and he also refused the ownership of such kind of material. Furthermore, the statement of accused driver Mr. Muhammad Fahim is recorded, who admitted about all the goods consist of fifteen Bilties and challan form and confessed that only a five Bags/Nags are unloaded at Bazar Thakot to Mr. Meno Khan and the rest of the goods mentioned in fourteen Bilties were occupied in the Truck but he could not blame police party for any miss conduct because he was not known to the quantity by heart. Statements of all the above persons Mr. Gul Khan, Mr. Alam Zeb and Driver Muhammad Fahim show that they are scared and they don't like to criticize Police for their misappropriation if any.

PROCEEDINGS:-

The undersigned examined the following police officers and other related persons as witnesses while the delinquent officer SI Said Mahmood was also examined, giving him ample opportunity of hearing him in person with his cross examination.

- a. Mr. Khan Sher s/o Shamshad Khan r/o Amangarh Nowshera.
- b. Mr. Minhajuddin s/o Hamal Khan r/o Jiglot.
- c. Mr. Muhammad Fahim s/o Nawab Ali r/o Abbotabad (Truck driver)

Attester

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- d. Mr. Gul Khan s/o Haji Ahmad r/o Dobair Nala Kohistan.
- e. Mr. Alam Zeb s/o Nowsherwan r/o Dubir Nala Kohistan.
- f., Mr Ajab Khan s/o Perviz r/o Mira Dandai.
- g. FC Rafiq Ullah No. 568 PS Dandai.
- FC Aziz Ullah No. 124 PS Dandai.
- 1. SPO Gulab Sher No. 459 PS Dandai. 🗸
- j. SPO Rahman Husşain No. 641 PS Dandai.
- k. HC Akbar Shah No. 4547 Elite Force.
- 👸 👎 FC Sultan Alam No. 4380 Elite Force.
 - m. FC Afsar Ali No. 4555 Elite Force.

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- n. FC Adalat Khan No. 4553 Elite Force.
- o. FC Muhammad Hanif No. 4551 Elite Force.

- p. FC Amer Baz No. 3019 Elite Force.
- q. HC Muhammad Ali No. 352 MHC PS Dandai.
- r. HC Rahman Ullah No. 143 Investigation Officer of the case.
- s. SI Said Mahmood (the delinquent officer).

All those examined at the course of the enquiry, unanimously reveal the authoritarian style of working of SI/SHO Said Mahmood, who is involved in dishonest misappropriation of 100 Kgs of Explosive material which was suppose to be the case and Govt: property. The statement evidence is briefly discussed as under.

A:-

In his statement on oath Mr. Khan Sher Munshi at Truck stand Faisalabad stated, that the disputed luggage i.e three bags on the name of Gul Khan and two bags on the name of Alam Zeb were loaded to the Truck for Rawalpindi and Bilty/Receipt No. 2433/3, 2434/2 dated 01-03-2015 were issued and are on record, who is declared as accused. (His statement is annexed as "A" 01 page).

B:-

In his statement on oath Mr. Minhajuddin Munshi at Truck Adda Rawalpindi stated that he had received the luggage in question and for further delivery were loaded to Truck No. 3960/RPT. Both the luggage were on the name of Gul Khan and Alam Zeb r/o Dubair Nala Kohistan. Bilty No. 198 was issued to the three bags of Mr. Gul Khan and bilty No. 199 for two bags to the name of Mr. Alam Zeb. All the goods consist of 15 bilties were correctly loaded to the truck in the presence of driver Mohammad Faheem. (His statement is annexed as "B" 01 page).

C:-

In his statement on oath Driver Muhammad Fahim has admitted, that all the Goods present in fifteen No. of Bilties including challan were loaded to his Truck properly. All the receipts/Bilties and challan were given to him by the Munshi of Chillas Truck Adda Rawalpindi. Before the apprehension of Police, only one luggage consist of five bags according to the Bilty No. 200 was unloaded at Bazaar Thakot and the rest of the all Goods were present at the time of Police operation.

The other part of the statement of truck driver M. Faheem doesn't favor the allegations and that can be due to the reason that the Driver is ignorant, scared of Police and he has no idea about the quantity that what the police did but the "A" part of the allegations is verified and during police operation the missing luggage were present in the Truck. (His statement is annexed as "C" 01 page) I these

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In their statements on oath, Mr. Gul Khan, Alam Zeb and Ajab Khan showed their unawareness about the transportation of illegal explosive material. They condemned the charges that the recovered stuff could be their property. (Their statements are annexed as "D, E, F" (01 by 01 page).

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Para "B"

D:-

Part "B" starts after the recovery was made, so the necessary statements of the related Police Officers/officials are recorded which are as under.

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1:-

In their statements on oath, witnesses of recovery memo constable Rafiq Ullah No. 568 and constable Azizullah No. 124 of Police Station Dandai, stated that during search operation of the Truck in question only three bags of explosive material were recovered on the spot and nothing more was recovered later on.

Their signatures on the recovery memo are true. During cross examination they admitted the fact that one bag of explosive were brought to the police station in Police mobile and the two bags were brought in the truck. They also replied to the question, that whether it is true that SHO lift the Station in Police Mobile without taking the gunner and driver? They said yes to the question that they were not accompanied with the SHO when he lift the station, but don't know where he had gone. (Their statements are annexed as "G"."H" 1/1 page).

In his statement on oath, driver SPO Gulab Sher No. 459 stated, that he was present during the search operation and the statement of SHO and witnesses of the recovery memo are false, not three but two bags were recovered on the spot and were loaded in the police mobile and three more bags were recovered when the Truck was brought to the police station and the total number of recovery were not three bags but that were five bags. During cross examination he disclosed much of the secrets that, there must be ambiguity in the registered FIR and it is true that the SHO lift the station just after when the truck was brought to the station and recovered the bags. He was not accompanied with SHO when he lift the station, SHO took the keys to figgn him and drived out of the station and only one HC Shah Hassan Cop was accompanied with him. (His statement is annexed as "1" 02 pages): Mr. HC/DSB Shah Hassan was also examined during inclusion statement was not recorded on his request because he is the source of information about the misappropriation in case process who favored the statement of the mobile Driver Gulab Sher verbally explained the whole situation that he and SHO all alone we out of the Station in a Police mobile and SHO was himself driving the vehicle and while when they were on the way, some quantity of explosive material was laying with them. He had further disclosed that he was dropped in bazaar Dandai and the SHO all alone went towards bazaar Thakot.

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In his statement on oath, SPO Rahman Hussain No. 641 Police Station Dandai stated that only one bag of Explosive was recovered on the spot and two bags were recovered after when the Truck was brought to the Police Station. Here is a Good contradiction in between the statements of Rahman Hussain, the SHO and witnesses of the recovery memo, which shows that something is wrong in the bottom. This SPO Rahman Hussain is one of the right hand of the SI/SHO. (His statement is annexed as "J" 01 page).

К:-

In their statements on oath, Elite Force Jawans HC Akbar Shah No. 4547, FC Sultan Alam No. 4330, FC Afsar Ali No. 4555, FC Adalat Khan No. 4553, FC Muhammad Haneef No. 4551 and FC Amir Baz No. 3019, stated that they were present during search operation and after necessary work done, the Truck was shifted to the Police Station and latter on they were informed that some explosive were recovered and case is registered against the Truck Driver but they were not sure about the quantity recovered on the spot: (Their statement are annexed as K,L,M,N,O, P, 06 Pages).

Q:-

In his statement on oath, MHC Muhammad Ali Police Station Dandai, stated that after receiving a murasela he had registered a case and three bags of explosive were handed over to him by the SHO and further he is unaware if something could be done wrong. (His statement is annexed as "Q" 01 page).

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In his statement on oath, HÇ Rahman Ullah No. 143 Investigation Officer of the case, stated that from the statement of the concerns and available record it has been confirmed that the missing two number of bags were properly dispatched from Rawalpindi and during search operation the bags in question were proved to be present in the Truck and the missing Bilty No. 199, which was latter on recovered from the record, make the case ambiguous and doubts of ambiguity exist. (His statement is annexed as "R" 01 page).

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In the light of all above, the delinquent SI was called, heard in person and his statement recorded on oath which is attached as annexure No. "S" 05 pages. (32 numbers of different performance and recommendation certificates with current progresses are also attached with his statement).

In his statement on oath, the delinquent officer Mr. Said Mahmood SI/ SHO stated, that a search operation was made on a received information. All of the three bags were recovered on the spot in the presence of witnesses. One bag was brought to the station in a police mobile while the two bags were brought in a Truck. Case was registered and accused was arrested and it is not true that after arrival to the station, he lift the station without Driver and Gunners. 'He denied to the allegations leveled against him. He refused to the changes that the necovered bags were five in numbers and he has made some changes and have sold the two bags an amounting of Rs, 50,000/-. Further said that on that very day, he had not lift the station till evening. No miss use of power is committed by him and he is innocent and regretted the evidence so for been brought on record in the inquiry. He was cross examined and an ample opportunity was given to him but he badly failed to prove that the bags were only three and his statement about leaving the station in a very suspicious condition was also proved false.

CONCLUSION:-

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It is evident from the inquiry that the whole process, which was needed to be proved, was consisting of two parts. During the first part it was tried to learn and prove that before search operation whole of the five bags were present in the Truck.

Actually fifteen numbers of Bilties along with challan are issued and all the Goods are loaded to the Truck in Rawalpindi. The misappropriated two bags were found to be the property of Mrt Alam Zeber/o Dubair

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Nala and a Bilty No. 199 is chalked for the said bags, which we consist of 100Kgs of Potassium Chloride. As for as the two bags were missing, on the same way their Bilty No. 199 was also missing and not produced to the I/O by MHC Muhammad Ali of the station and the same Bilty and their quantity was shown in the challan form recovered to gather with the rest of the Bilties, so during investigation/inquiry it is confirmed from the statements and record that the missing two bags were available in the Truck before it was searched.

In the second part of the inquiry it was tried to prove that the police party have recovered five numbers of bags and the case is registered on only three bags and SI/SHO Said Mahmood has dishonestly misappropriated the two bags and have sold that, which were of worth Fifty Thousand. The contradiction in the statements of SHO, Driver SPO Gulab Sher No. 459 and SPO Rahman Hussain No. 641 give benefit and favor the charges leveled by the competent authority. The most important eye witness is driver Gulab Sher, who has voluntarily described the whole story and has admitted that the recovered case property was not three bags in numbers but that were five and the statement of I/O also favors the statement of driver SPO Gulab Sher. The verbal statement of HC/DSB Shah Hassan who is also the eye witness certified the statement of I/O and driver who is behind the screen. Leaving from the Police Station just after the recovery in a very suspicious condition that the SHO did not take his Gunners and Driver and drived the Car himself and it was also proved from the statement of Driver Gulab Sher and verification of the HC Shah Hassan, that at the time of leaving the station two bags of recovered Explosive were present in the police mobile and after when the SHO arrived back, the bags were unloaded somewhere. The recovered Fourteen number of Bilties+ challan form were annexed as "T" while the missing Bilty now recovered was annexed as "U".

RECOMMENDATION:-

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It is evident from the inquiry that the delinquent officer Sub Inspector Said Mahmood (the then SHO of Police Station Dandai) has misused his authority for the sack of money. He joined police services as constable on 01-05-1993 and has completed all most 22 years of service. The undersigned is therefore of unanimous view that the delinquent officer was found guilty of misconduct and found involved in the dishonest misappropriation of case property/Govt: property, which is a big stigma on police Department, so consequently I the undersigned recommend him for major punishment. Submitted please.

> Attested to be Train Copy

Superintendent of Police, **Investigation Shangla**

FINAL SHOW CAUSE NOTICE

I <u>Faisal Shahzad (PSP)</u> District Police Officer. Shangla being a competent authority ALACE Hunder the Police Disciplinary Rules 1975 do hereby serve you SI <u>Said Mahmood</u> ALACE Hollows:-

- i. The consequent upon the completion of inquiry conducted against you by the Enquiry Committee, for which you have given opportunity of hearing vide this office No. 07/E, dated 10.03.2015.
- ii. On going through the findings and recommendations of the Enquiry Committee, the material so produced on record and other connected papers including your defense before the enquiry committee, during the proceedings.

I am satisfied that you have committed the following acts/omission specified in Section-3 of the said Ordinance:-

You SI Said Mahmood while posted as SIIO at Police Station Dandai have recovered 3 bags of potassium chloride total 150 Kgs during search and strike operation from the disposal of Muhammad Faheem s/o Nawab Ali r/o Abasian P.O Beroot Tchsil and District Abbottabad and Todged FIR vide No. 18 dated 05.03.2015 ws 5-Exp: Sub Act at Police Station Dandai. Later on it has been noticed through reliable sources that the actual bags of the potassium chloride were 05 instead of 03 and the remaining 02 bags of potassium chloride has been sale yourself amounting to Rs. 25000/- each to one Ajab Khan r/o Thakot District Batagram who is a dealer of such kind explosive. Your this act gross misconduct/negligence on your part, which rendering you liable to be proceeded against departmentally.

- 2) As a result thereof, I as competent authority have tentatively decided to impose upon you the penalty of Major/Minor Punishment as deemed appropriate under the prescribed rule as may be.
- 3) You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you also intimate whether you desire to be heard in person.
- 4) If no reply to this notice is received within seven (7) days of its delivery in the normal course of circumstances, otherwise it shall be presumed that you have no defense and that case a ex-partee shall be taken against you.

5) The copy of the finding of the Enquiry Committee is also enclosed.

ttested to be

District Police Officer. h Shangla

NO o7Dated 10 /04/2015

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بحواله فائنل شو کاز کونش اظهار وجوه حتمی مجاربیه جناب OPO صاحب شانگله نمبری 07/E مورخه 10.4.2015 بسلسله مقدمه علت نمبر 18 مورنده 5.3.2015 جرم Exp: Sub: Act 5 تقانه دندي معردض خدمت ،ول كه ميں SI تقانه دند كى ميں مورخه 14.11.2014 كوبحيثيت SHO تعينات ،و چكاتھا۔ قبل ازیں میں بحیثیت انچارج چو کی دندئ مورخہ 11.1.2013رہ چکا ہوں۔ جب سے میں یہاں پر Appress I م غیبنات رہا ہوں اپنی فرائض منصبی احسن طریقے سے سرانجام دے چکا ہوں ادر میرے بہترین کارکردگی کی وجہ سے کافی مقدار میں اسلحہ، ایمونیشن، منشیات ، ٹمبرادر باردد کی برآمدگی کی ہے۔ جس کی صلہ میں مختلف DPO صاحبان اور جناب DIG صاحب ملاکنڈ ڈویژن نے تعریفی اساد سے نوازا ہے ۔ نقولات سیٹمنٹ کارکردگی ، نقولات سر ٹیفکیٹس لف ہذا ہیں۔

مقدمہ بالا کی اصل کہانی یوں ہے کہ میں مورخہ 2015، 50 کو تھا کوٹ پل کے قریب دندئ سے سرائیک اینڈ سرچ اپریش پر موجود تھا ۔ میر ے ساتھ ایلیٹ فورس نفر کی کے علاوہ دیگر نفری رفیق اللہ 568، عزیز اللہ 124/FC بھی موقع پر موجود تھا اس دوران جانب تھا کولی سے ایک مزدا نمبر 3960 TRPT کر مشکوک جان کر اشارہ پر کھڑ اکیا۔ بدوران ابتدائی تلاشی گاڑی متذکرہ میں تین مشکوک بوریاں پائی گئی۔ ایک بوری کو گاڑی سے پنچ اتار کر چیک کرنے کی غرض سے کھولا گیا تو بوری سے دوتھیلیوں میں بند پوٹا شیم کلورا ئیڈ کو گاڑی سے پنچ اتار کر چیک کرنے کی غرض سے کھولا گیا تو بوری سے دوتھیلیوں میں بند پوٹا شیم کلورا ئیڈ عردا پن سرکاری گاڑی نہ بر 1984 میں ڈالی گئی کے خاطر گاڑی مذکورہ کوتھا نہ لے جایا گیا اور اتاری ہوئی بوری ایک عردا پن سرکاری گاڑی نہ بر 1984 میں ڈالی گئی کیونکہ شد ید پارش اور نفری کے ساتھ ہمت اور جیکٹ موجود ہونے کی وجہ ہے بوری دوبارہ ٹرک میں واپس ڈالنا مشکل تھا۔

تھان پینچتے ہیں گاڑی سرکاری سے ایک بوری اور دو بوری مزدہ متذکرہ سے اتار کر حوالہ محررصا حب کی گئی۔ بازار سے مزدور بلا کر مزید تلاثقی اور غیر قانونی اشیاء کی برآمدگی کی خاطر پورے مزدہ کی تفصیلی تلاثقی لی گئی مگر مزید کوئی غیر قانونی چیز برآمد نہ ہوئی ۔ برآمد شدہ تین عدد بور یوں کے اندر 2/2 تھیلے پوٹا شیم کلورائیڈ کل چھ عدد تھیلے وزن کئے گئے جو کہ دزن کرنے پر 25/25 کلوگرام لینی کل 150 کلوگرام پوٹا شیم کلورائیڈ کلی۔

ہرایک تھیلے میں ۔۔۔ 10/10 گرام یعنی کل 60 گرام پوٹا شیم کلورائیڈ بغرض تجزیر علحید ہ علحید ہ پارسل میں ہند کرکے لیبارٹری بھجوانے حوالہ محرر تھانہ کی گئی ۔ حالات و واقعات ۔۔۔ نوعیت جرم ہالا پا کر مقدمہ بالا درج رجسٹر ڈکیا گیااور تفتیش کے لئے تفتیش سٹاف حوالہ ہوئی ۔

میر ب ساتھ شاہ حسن HC جس کے ڈائری پر میر ب موجودہ تحکماند کاروائی موجود ہے مذکورہ ہید کسٹیل ماقبل بحثیت OHC اپریشن اسٹاف میں تعینات تھا جس کا طرز من درست بیس تھا اور کارسر کار میں دلچیپی (جاری) Atto Solo Be

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جناب عالي!

(2) نہیں لے رہاتھا۔ میں اے اپنی کارکردگی کو درست کرنے کے لئے تحریری پروانہ جات جاری کئیں مگراس کا پراگر آ درست نہیں ہوا۔ پر داندجات کی نقولات DPO صاحب اور SDPO صاحب کے خدمت میں ارسال کیا تھا۔ میں نے جو پروانہ جات مٰدکورہ HC کو جاری کی ہیں اس کی نقل کا پی افسران بالا صاحبان گوارسال کی تھی ۔ بدیں دجہ مذکورہ HC سے افسران بالا نے تحریری جواب طلی فرمائی اور میر ہے ساتھ دل بدی شروع ہوئی ۔اوراس کے بتیجہ میں مذکورہ HC نے اس وقت سے میرا مخالفت شروع کیا ۔ ای شکایت پر مذکورہ ایریش اساف ۔ DSB تبديل ہوكرتھانہ دندئ ميں تعيينات كيا گيا۔

روز وقوعہ مذکورہ HC جس کا تعلق سمظر اور جرائم پیشہ افراد کے ساتھ ہے نے ملزم کی خلاصی کے لئے بطور سفارش شاہ نظر عرف باجی سکنہ کوز کلے دند کی ،عجب خان ساکن میرہ کے ذریعے مجھے بھاری رشوت دینے کی پیشکش کرتے ہوئے جرم دفعہ تبدیل کرنے کے لئے کہا گیا جو میں نے مستر دکر دیا۔ جب ان کی بیکوشش ناکام وئی تو مذکورہ اشتعال میں آکر میر انخالف بن گیا۔

بعد از اندراج مقدمه مذکوره HC کی بیکوشش رہی کہ میں مالک آڈہ جہاں سے بارود بلخی کی گئی تھی اور گل خان دُکا ندارکو طزم مقدمه نه بنانے پراپنی سخی اورکوشش کی مگر چونکه میں ایک دیا نتدارا در فرض شناس پولیس افیسرک حیثیت سے اپنے فرائض سرانجام دے رہا ہوں ۔ مذکورین کی ایک نه چلے دی۔ بدیں وجہ مذکورہ HC اور ان کے مرح دوست سمگران ، جرائم پیشہ وغیرہ میرے مخالفت پر اتر آئے ہیں۔ اس کے مذموم مقاصد جب پورے نه ہوتے تو اس نے میرے خلاف من گھڑت اور بے بنیا و ڈائر کی میر تب کی ۔ اصل ملزم کی گرفتاری و شامل تفتیش کر نے اور مقد مہکوشفاف اور بنی برانصاف طریقہ سے منطق انجام تک پہنچا نے کے لئے 10 کو زبانی ہدایات ہمی کی ۔ اور بحواله مد مقد مہکوشفاف اور بنی برانصاف طریقہ سے منطق انجام تک پہنچا ہے کہ ایس کی ڈوز بانی ہدایات ہمی کی ۔ اور بحواله م

جہاں تک انکوائری کی گواہ سرکاری ڈرائیور گلاب شیر 559/SPO کا تعلق ہے۔ مذکورہ SPO میر ف ساتھ ایک گاؤں میں رہائش پذیر ہے اور اس کے ساتھ دل بدی کا واقعہ کچھ یوں ہے کہ مذکورہ SPO ڈرائیور . طالبا نائز یشن کے دوران دہشت گردوں سے ملا ہوا تھا اور دہشت گردانہ کا روائیوں میں ملوث رہا ۔ بدوران طالبا نائز یشن ندکورہ SPO ہمقام بابو چنارخوازہ خیلہ سوات میں طالبان کے ایک گروپ کا کمانڈنگ کرر ہاتھا اور قاری صاحب کے نام سے مشہور تھا۔

سال 2009 کومی بحیثیت OHC تعینات تھا۔ مذکورہ SPO نے سیش فورس بھرتی کی درخواست دی جس کا میں نے بھر پورمخالفت کرتے ہوئے اس کی دہشت گردانہ سر گرمیاں سابقہ OPO کے نوٹس میں لایا اس میں سابقہ OPO کے نوٹس میں لایا اس کی منازش کی نیاد کر ایس ایک کا فرانسفر خورس (جاری) کا فرانسفر فورس (جاری) کا میں میں SPO کے تو کس میں کا کا فرانسفر کی کا کا فرانسفر کی کا کا فرانسفر کا کا فرانسفر کی کا کا فرانسفر کا کا فرانسفر کی کا کا فرانسفر کا کا فرانسفر کی کا کا فرانسفر کی کا کا فرانسفر کی کا کا فرانسفر کی کا کا فرانسفر کا کا فرانسوں کا کا فرانس



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میں بھرتی کروایا۔ مذکورہ چونکہ بیشہ کے لحاظ سے ڈرائیور ہے اور اس کو تھانہ دندی کی سرکاری گاڑی پر ڈرائیور لعینات کیا گیا۔اور میں نے اس کی تھانہ دندی میں تعیناتی کی سخت مخالفت کی تھی کیونکہ دندی ایک حساس پولیس اسٹیشن تھا دہاں پر KKH سڑک واقع ہے جس پر 24 گھنٹے غیر ملکیوں کی آمد ورفت ہوتا رہتا ہے ۔ مذکورہ ڈرائیور میر نظر میں قابل اعتبار نہیں تھا۔ چونکہ غیر ملکیوں کے ساتھ ڈیوٹی بذریعہ سرکاری گاڑی کی جاتی تھی اور بی خص اس ذمه داری کو پورا کرنے کا اہل نہیں تھا ۔لہذا MTO صاحب کو مذکورہ ڈرائیور یہاں پر تعینات نہ کرنے کی 🔹 استدعا کی لیکن مذکور ہمخص سفارش پر سفارش کرتا تھا۔

مزید بیر کہ مذکورہ ڈرائیور چرس کے نشخ کا عادی اور سپلائز ہے ملنے پر شراب بھی پیتا ہے اور برے اور غیر اخلاقی کا موں میں ملوث رہتا ہے اور سیکیو رٹی کے لحاظ سے انتہائی نا قابل اعتبار ہونے کی دجہ سے جب میں ڈیو ٹی پر جاتا تھا دوسرے ڈرائیور کی عدم موجودگی میں میں بذات خود گاڑی چلا کراس کوساتھ نہیں لے جاتا تھا۔ مذکورہ ڈ رائیورکومختاط اور اپنے کرتو توں سے باز رہنے کا بار بار ہدایت کیا جاتا تھا اور اس پر کھڑی نگاہ رکھا جاتا تھا۔ بدیں دجہ مذکورہ ڈرائیور میرے ساتھ بغض دعناد رکھتا ہے اور میرے خلاف موقع کی تلاش میں تھا۔ حالا کہ مذکورہ ڈرائیور میرے پڑوی ہے۔

روز وقوعہ مذکورہ ڈرائیور میرے ساتھ دوران تلاش مزدا موجود نہ تھا اور نہ ہی ان بوریوں کے بارے میں کوئی علم تھایا ہے۔ ڈرائیور کا کام گاڑی کے سیٹ میں موجود رہنے اور دائر کیس کی ڈیوٹی ہوتی ہے۔ اگر مذکورہ د را ئيور دوران تلاش د چيکنگ مزده مي*ن موجود ہوتا تو فر دکا گواہ ب*ناديتا۔

ان دو کسان نے میرے خلاف جرائم پیشہ عنا صرحن کے خلاف میں نے ہر لحاظ سے کیرا ننگ کیا تقااور ابیخ مذموم مقاصد میں ناکام بنائے ۔ ایک منظم سازش کے تحت میرے خلاف مل کر بچھے بلا وجہ بدنام کرنے کے لیے خفیہ طور پر افسران بالا صاحبان سے مقدمہ ہذا میں بددیانتی کی شکایت کی جس کی بناء پر میرے خلاف انکوائری ہذا شروع کی گئی۔ مذکورین کے خفیہ اطلاعات اور دوران انگوائری میرے خلاف بیان بازی بالکل جھوٹ ،من گھڑت اور بے بنیاد ذاتی عدادت اور رنجش پر بنی ہے اور اس میں کوئی حقیقت نہ ہے ۔ پھر بھی مٰدکورہ کسان مجھے بدنام کرنے اور میرے دیانتداری پر داغ لگانے ، میرے سروس اور میرے منتقبل کو تباہ کرنے کی سازش مجر مانہ میں ملوث ہیں جس کا واضح ثبوت ہیہ ہے کہ مذکورہ ہر دوکسان نے انگوائزی کے دیگر گواہان کو پریشرائز کیا ہے اور میرے خلاف بیان بازی پراکسا کرمخالفت میں بیان نہ دینے پر ڈراتے دھمکاتے رہے۔ جناب والا!

میں ایک فرض شناس اور دیانت دار پولیس افیسر ہوں ۔ میں نے اپنے ملازمت کے د دران سوات اور شا نگلہ میں دہشتگر دوں کے پلغار کے دوران اپنے گا وُں لیکچ پی مطالبان کے تین (جاری) Atteste Dig be

True Kopy

(4) اہم کمانڈرز جو کہ پولیس اہلکاروں کے شہادتوں میں ملوث تصاور ساتھ ہی دو کم سن خودکش کو گرفنار کر کے پولیس >) تھاندالپوری کےحوالہ کئے تھے۔ ضلع سوات میں دوران ڈیوٹی مورخہ 20.10.2010 کو پاک آرمی کے ساتھ تین اہم کمانڈر دواخان عرف تا تار، سردارعلی، حضرت علی مشتر که اپریشن میں مارے گئے ۔سال 2011 میں ماہ رمضان اور عبیدالفطر میں علاقہ تیلگرام وغیرہ سوات میں مشتر کہاپریشن کے دوران 16اہم طالبان مارے گئے جس میں بھی میں شریک تھا۔علاقہ تھانہ ملم جبہ جو کہ دہشتگر دوں کا گڑ ھتھا میں میں نے خود کش ٹرینیگ حاصل کرنے والے حبیب اللّٰہ، ر فیع اللہ فضل ودود ،فضل رحمٰن اور شیر علی نامی کمسن طالبان کو گرفتار کر کے پاک آرمی کے حوالے کئے جس کا بعد میں پاک آرمی نے ان کے برین داش کر کے اب معمول کی زندگی گزارر ہے ہیں۔ اس طرح ملم جبہ سوات میں میں . نے 12 نفر طالبان دہشتگر دگر فنار کرکے پاک آ رمی کے حوالہ کئے جا کر سز اپورا ہونے پر مختلف ہنر سکھاتے ہوئے ر ہا کئے گئے ہیں جواب معمول کی زند گیاں گزارر ہے ہیں۔ مؤ ثر اطلاعات پاک آ رمی کود ہے کر پاکستان کے مختلف شہروں پنجاب، راوالپنڈی، کراچی، کوئدید، پشاور، مردان، بخت بھائی وغیرہ سے کئی طالبان دہشتگر دگر فتار کئے جاچکے ہیں۔اس کےعلاوہ میرے سروس ریکارڈ پر بہت ے کار ہائے نمایاں موجود ہیں ۔جس کے صلہ میں پاک آ رمی کے افسران نے مجھے تعریفی اسناد سے نوازا ہے ۔ (نقۇلاتلفېي) میں ایک فرض شناس ، دیانت دار ، قابل اعتبار اور ذمہ داری نبھانے والا پولیس افیسر جناب والا! ہوں۔اس دجہ سے سار بے لوگ میر بے مخالف ہیں اور مجھے جانی د مالی نقصان پہنچانے کے در پے رہتے ہیں اور کنی بارمیرے گھر پر حملے ہوئے ہیں تا ہم ابھی تک میر بے خالفین کسی بھی قتم کے نقصان پہنچانے میں اللہ تعالیٰ کی فضل وكرم سے كامياب نہيں ہوئے ہيں۔ موجودہ واقعہ من گھڑت داقعات جھوٹی شہادت دینے پرختم نہیں ہوسکتا بلکہ بیامکان موجود ہے کہ بیلوگ میرے خلاف مزید بے بنیاد الزمات عائد کر کے نقصان پہنچانے کی کوشش کریں گے ۔ کیونکہ ہر دو کسان نے ديگرگواہان کوغلط کائيژ کر کے اصل حقائق چھپانے آور منی برجھوٹ بيان دلائے کے درپے تھے۔ چونکہ موجودہ دانعہ میراحسن کارکردگی ہےا سلئے میرے مخالفین اوران کے حامیوں سے ہفتم نہیں ہور ہی اور میرے نیک شہرت کو پا ؤں تلے روند نے کا منظم منصوبہ بنایا ہے اور میر پے شہرت پر کیچڑ اچھالنے کی کوشش کی ہے۔ روز دقوعہ میں بازارتھا کوٹ بالکل نہیں گیا تھا جس کا رب العزت گواہ ہے۔ تا ہم میں عصرویلہ علاقہ مانڑ ک میره میں چوری چکاری کی دا قع پیش ہو کر کانی سار کی نفری بغرض معلومات ادھرموجود تھا۔گاڑی میں (جاری) Attes. \mathbb{C} : \mathbb{C}

(5)

شاہ حسن HC ساتھ بٹھا کرنفری لانے کی خاطر اور دقوعہ کوخود ملاحظہ کرنے کی نبیت سے خود جا کر تھانہ واپس ہمراہ نفری آ کرآمد پر جناب DSP صاحب ہیڈ کوارٹراورانسپکٹرنضل وہاب خان شعبہ تفتیش بھی تھانہ میں موجود بتھاور حالات وواقعات ہے پوری طرح اگاہ گئے۔ درجہ بالاحقائق کےعلاوہ سائیل کے پاس بہت سے داقعات ہیں جو منصوبہ ہندی کے تحت سازشوں کے ذریع ممل میں لاتے جارہے ہیں تاہم بات کمی ہونے کی ڈرہے۔اگر جناب OPO صاحب موصوف اپنے حضور میں سائیل کو پیش کرنے کا موقع دیں تو صاحب موصوف کے گوش گزار کروں گا۔ادر کل 18 گواہان میں سے

ماسوا کے گلاب شیر SPO اور شاہ حسن HC کے تمام کے بیانات میر ے ق میں ہیں۔ مذکورہ اطلاع ددبارہ خرد برد، خیات بحر مانہ، رستوت ستانی کے الزامات میں کوئی حقیقت نہیں ہے۔ سیا یک بنی بنائی سازش ہے۔ میں اینے کنبہ اور خاندان کا واحد کفیل ، وں اور پولیس کا تخواہ وسیلہ ہے۔ نیز میں ایک بار پھر حلفا کہتا ہوں کہ مذکورہ مزداسے میں نے صرف تین بوریاں برآ مدکن تھی نہ کہ پانچ بوریاں۔ -اسلنے میری استدعا ہے کہ انکوائری ہزابلا مزید کا زوائی داخل دفتر فران کی جاتے تو سائیل بمعداہل دعیال

سيدمجودسب انسيكثر متعيينه بوليس لائن ضلع بثا نكل

Reply to the pinal back in the Cause thatice & ceine of printing Releing/un 181 Syed - 100 - 10 ادركوني امرمخفي يا پوشيده نيس ركها كيا ب- ي / 17/ من م م مهمه الم محمد الم محمد الم محمد الم HA PLO mitte Which perusal & Make as at (FN) deam fit Please. Myul 14/15/7.04.015 MOJO PL Attested to Trzie Copy

<u>ORDER</u>

1. This order will dispose of the departmental proceedings against S1 Said Mahmood the then SHO Police Station Dandai. Allegations were leveled against him to have recovered 3 bags of potassium chloride total 150 Kgs during search and strike operation from the possession of Muhammad Faheem s/o Nawab Ali r/o Abasian P.O Beroot Tehsil and District Abbottabad and lodged FIR vide No. 18 dated 05.03.2015 u/s 5-Exp: Sub-Act at Police Station Dandai. Later on it has been noticed through reliable sources that the actual bags of the potassium chloride were 05 instead of 03 and the remaining 02 bags of potassium chloride were sold by you amounting to Rs. 25000/- each to one Ajab Khan r/o Thakot District Batagram who is a dealer of such kind of explosives.

 He was properly Charge Sheeted and with Summary of Allegations Mr. Bakht Zada Khan, SP Investigation was appointed as Enquiry Officer.

3. The Enquiry Officer proceeded in his finding has recommended for major punishment. Hence forth, the delinquent officer was served with Final Show Cause Notice vide No. 7/E, dated 10/04/2015 who submitted his reply accordingly.

4. Finally, he was summoned in the office of the undersigned in Orderly Room but he failed to produce any cogent evidence to rebut the charges leveled against him. I have gone through the record placed on file, the charges stand proved without any shadow of doubt.

 Henceforth, I <u>Faisal Shahzad PSP</u> District Police Officer. Shangla being competent authority. under Khyber Pakhtunkhwa. E&D Rules 1973 (Amended in 2011) and Police Rules 1975 hereby award him major punishment i.e. compulsory retirement with immediate effect.

Order announced.

(FAISAL SHAHZAD) PSP District Police Officer, Shangla

ANNE

ob no <u>53</u> Dated 23/4/2015

BEFORE THE WORTHY DEPUTY INSPECTOR GENERAL OF POLICE MALAKAND REGION AT SAIDU SHARIF SWAT

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER OF D.P.O SHANGLA VIDE OB NO. 53 DATED 23.04.2015 WHEREBY THE APPELLANT HAS BEEN AWARDED MAJOR PENALTY LE COMPULSORY RETIREMENT FROM SERVICE

Prayer:-

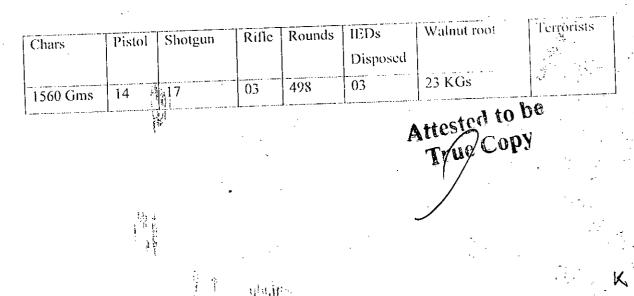
On acceptance of this departmental appeal the impugned order of District Police Officer Shangla dated 23.04.2015 be set aside and the appellant be re-instated in service with all back benefits and other rights.

Respected Sheweith,

The appellant submits as under:-

- 1. That the appellant is serving in police department for the last 22 years having glaring service record and during the course of service the first appointment of the appellant is 01.05.1993 and on 08.03.2003 the appellant was promoted to the next rank of Head Constable (Service Record is *annexure A*)
- 2. That during the course of Service the appellant has also discharged his duties with honourable DPO as Driver and Guner.
- 3. That during the course of Service the appellant discharged his duties as base Responsible police officer in which connection the appellant has performed remarkable achievements in which so many terrorists were put to task and so many were arrested and handed over to Pak Army officials.
- 4. That during 22 years of Service the achievements and performance of the appellant are as following:-

Performance/Progress during the course of Service at District Swat from July 2010 to April 2012





High Explosive Safety Fuse Short gun Chemical Rounds Heroin Liquor Opuim Chars Pistol Rifles SMG . 20 962 02 10155 28 07 01 ÏÌ 13128 05 150 988 KG Kg Feet Ltr Timber POs Takhta Walnut Bazo Sleepers 54 94 05 83 782

Performance/Progress during the course of Service at District Shangla from 11.02.2013 to 05.03.2015

- 5. That during posting of the appellant at police Stations Dandai the appellant has been awarded Class-II Certificate by Worthy Regional Police Officer Malakand with cash award of Rs. 1000/- in connection with recovery of 39000 Grms Chars vide FIR No. 166 dated 21.04.2014 the photo copies of which are attached for ready reference. Moreover the appellant has also undergone ATS Training.
- 6. That during the course of Service appellant has over all performed 37 achievements coupled with the arrest of Suicide Bombers in the appreciation of which Pak Army Officials have also blessed the appellant with Certificates and keeping him view all thus achievements . the appellant was required to be blessed with High Level awards (all certificates are attached herewith for ready reference).
- 7. That keeping in view all thus performance the appellant was promoted to the post of Sub Inspector on which all other fanatical colleagues of the appellants were annoyed and all of them managed different conspiracies against appellant because the appellant was on the Top in Malakand Division keeping in view good performance and ideal achievements.
- That all of a sudden the appellant apprehended a MAZDA vehicle form which three maund (150 Kgs) of Potassium Chloride was recovered and resultantly a case Vide FIR No. 18 dated 05.03.2015 Police Station Dandai u/s 5 Explosive Substances Act was registered (copy of FIR is attached)
- 9. That the enemies and rival of appellant inter department which has been fully detailed in the witness statement of appellant during the course of enquiry managed a conspiracy and consequently an enquiry was conducted against the appellant which ended in awarding major punishment to the appellant in the shape of compulsory retirement.

Arrested to be

10. That the appellant being aggrieved from the impugned order of District Police Officer Shangla dated 24.03.2015 is constrained to file the instant departmental appeal on the following grounds among others.

<u>Grounds:</u>

- A. That the appellant has not been treated according to law.
- B. As well as District Police Officer is the result of misreading and non reading of evidences.
- C. That no opportunity of being heard has been provided to the appellant. Thus the entire proceedings have been conducted in utter disregard of Law and material s placed on record.
 D. That no opportunity of the second sec
- D. That no opportunity of cross examining of witness has been afforded to the appellant in order to shake the veracity of witnesses deposing against appellant and the entire evidence has been recorded in the absence of the appellant.
- E. That no opportunity of leading any evidence in defense has been provided to the appellant.
- F. That the enquiry has been conducted by Enquiry Officer who was otherwise not
- G. That the D.P.O Shangla was also lacking legal jurisdiction to pass the impugned order of compulsory Retirement.
- H. That no opportunity of personal hearing has been afforded to the appellant thus the finding and final impugned order is taken with illegal infirmity resulting into miscarriage of justice.
 I. That the average of the second sec
- That the over all performance and achievements of the appellant was totally ignored in contrast with bare unproved allegation against the appellant.
- J. That the overall performance and achievements of the appellant has been vanished through a single stroke of witnesses in the absence of proper defense pleaded by the appellant in his exhaustive written statement which was not probed into or considered by the D.P.O Shangla.
- K. That the entire Enquiry has been conducted his utter disregard of law rules and principles of natural justice equity and good conscious.

It is therefore, most humbly prayed that on acceptance of his departmental appeal the impugned order of D.P.O Shangla dated 23092015 whereby the appellant has been awarded major penalty of compulsory retirement be set aside and the appellant service be restored with all back benefits and other legal entitlement.

Your's Obediently Appellant Attect to be

(Said Mehmood) Sub Inspector Shangla Police

29.04.015

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OFFICE OF THE REGIONAL POLICE OFFICER, MALAKAND REGION AT SAIDU SHARIF SWAT

<u>ORDER</u>

This order will dispose off departmental appeal of Ex-SI Said Mehmood of Shangla District.

Brief facts of the case are that SI Said Mehmood while posted as SHO PS Dandai, allegation were leveled against him to have recovered 3 Bags of Potassium Chloride total 150 kgs during search and strike Operation from the possession of Muhammad Faheem S/o Nawab Ali r/o Abasin P.O. Beroot Tehsil District Abbottabad and lodged FIR vide No.18 dated 05/03/2015 u/s 5 Exp: Sub Act at Police Station Dandai. Later on it has been noticed through reliable sources that the actual bags of the Potassium Chloride were 05 instead of 03 and the remaining 02 bags of Potassium Chloride were sold by him at the amount of Rs.25000/- each to one Ajab Khan r/o Takhkot District Batagram dealer of such kind of explosives. Consequently he was proceeded against departmentally. Mr. Bakht Zada Khan, SP Investigation was appointed as Enquiry Officer. The Enquiry Officer after detailed enquiry recommended him for major punishment. So after completion of codal formalities the delinquent Officer was awarded major punishment of compulsory retirement from service by the District Police Officer, Shangla vide his office OB No.53, dated 23/04/2015.

He was called in Orderly Room on 23/06/2015 and heard him in person. The appellant did not produce any substantive materials in his defense. Therefore I uphold the order of District Police Officer, Shangla, whereby the appellant has been awarded punishment of Compulsory retirement from service. The appeal is rejected.

Order announced.

Sd/-(AZAD KHAN) TST, PSP REGIONAL POLICE OFFICER, MALAKAND, AT SAID SHARIF SWAT

No. <u>5197</u>/E, Dated <u>25-6-</u>2015.

Copy to District Police Officer, Shangla with reference to his office Memo: No.3417/legal, dated 28/05/2015.

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OFEICE OF THE REGIONAL POLICE OFFICER, MALAKAND REGIS AT SAIDU SHARIF SWAT

ORDER:

This order will dispose off departmental appear Mehmood of Shangia District.

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🗠 Order announced

/2015.

6-

(AZAD KHAN) TSL PSP Regional Police Officer, Mulakand, at Saidu Sharit Swat

Coplic District Police Officer, Shangla with reference to be office Memo: No. 3417/legal, dated 28/05/2015.

THE Attraction to be NA Attraction to be NA Poghange Remained 14.7.15

TO WHOM IT MAY CONCERN

It is certified that Mr. Said Mehmood Mirza, has performed the duties as Assistance Sub Inspector of Police Station Malam Jabba with effect from 09 December 2009 till todate. He is a smart, well disciplined and dedicated officer with high character, integrity and exceptional professional skills. His services for Pakistan Army during the entire period has been exemplary and commendable. He was always found very alert to situations and was very forthcoming in his mannerism and conduct. I wish him best of luck in his service.

Maior

Officer Commanding Malam Jabba (Saqib Naseer)

10 Sind Regiment Operation Area January 2011 TH 'ND y Grood

Ien

The following indis made it suse te apprehend me suspected person Hadsibullah 5/2. Shes buitab from (28 mingoser in Police custody and handed over to Army cliect post is at malam Jaba. Their effost shall at acknowledged in order to he their mosal and pirits. 1. Hespeed mehmood. 2.Fc Neuverb Chan. 3. PFC Suleman khan Thanks for their help and 14 Ayas Mehmood assistance. Army check post malam Taba Ayazm Plumas COY 17 AK BEUT Attestes to be True Copy

م مسری ورقل طر ک تبسرانه ولد ترطاب بربه ورست طور محدام الم المرار ما ما smolps-m/5mber. 10 1/3/2010 5-5-20 2 33 July 2010 2 - 5-50 لعر 17/18 سال - رتد مرى فستس 14 Jaken over by 10th pet Army check post Malam Jaba D Wazne elmore \$ 2/3/09

MERTI CERTIFICATE It is concerned that ASI Syned methodored polico sta malanjaby has remained very co-operative with army and has carried out varios operations agained militants. He is very brave and porforme his duty with hencur. He has remained with Amy and helped and a lot. Inshallah he will assist Pak Army and will runain as brance as he Captain Mesane 17 Ak Rogel. 0946629524 03455 889992 Malanjaba. Truz Copy Oleccien MA

bet is certified that the syled mehmic has been very heloful to pak frong in local area malang Jaba in Carrying Out various task. He has been an excellent Source and executor in carlying out digerent beach operation and allesting Suspected Talibans and kindly encourage his spint. and zeal in prosm of promotion reward to Further enhance his Capabilities Themas. Kegards LA Ayoz Malam Jaba Army check post Ayon Glimon-02-00 1 22 NBOR 2070 Attested to be File



ORDER:

In exercise of powers vested in me vide serial No. 17 (i) delegation of powers, sanction is hereby accorded for the grant of Cash Reward of Rs: 1000/- (One Thousand) only with CC-II to ASI Said Mahmood Incharge of Dandai Check post of Shangla District in connection with recovery of 3900-Gram Chars vide case FIR No. 166 dated 21-04-2014 of Police Station Besham.

The expenditure involved will be met out from the funds placed at the disposal of District Police Officer, Shangla under code-AO-6103 Cash Reward to Police during the current financial year, 2013-2014.

*********>>>>>>>>>>

(ABDULLAH KHAN) PSP Regional Police Officer, Malakand at Saidu Sharif, Swat.

No. 5790-91-1A, Dated: $\frac{22}{4}$ /2014.

Copy to the:-

- 1. District Police Officer, Shangla.
- 2. District Accounts Officer, Shangla.
- 3. Account Region Office, Swat.

Attested to be True Copy

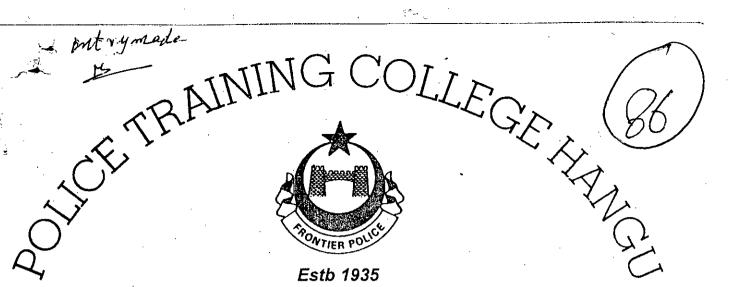
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ATTING TO THE AND THE	
TAK POLICE	
Commendation Certificate	
CLASS II	
Abdullah khan psp	
DEPUTY INSPECTOR GENERAL OF POLICE MALAKAND REGION-III SAIDU SHARIF SWAT.	
Son ofSHANGLA	
In Recognition of	
HIS RECOVERY OF 3900 GRAM CHARS VIDE CASE FIR NO.166 DATED 21-4-2014.	
CASH REWARD OF RS:1000/-	
No. 5790-51/A. Date 22/4/2014. Date 22/4/2014. No. 5790-51/A. Date 22/4/2014. Date 22/4. Date 22/4. Da	
Date 22/4/2 alker. Dy: Inspector Generation Police, Malakand Region, Saidu Sharif, Swat.	

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i >NORTH WEST FRONTIER PROVINCE POLICE trymade in - \mathcal{S} Attestød to be Trøe Copy S-R PROFESSIONAL CERTIFICATE Certified that ______ Said Mehneed, Constable _____No.___949/Swat attended _____ 2nd: Basic Anti-Terrorist Squad___ course held by CID N.W.F.P. Peshawar from 26th: August, 1995 to 18th: December, 1995 and qualified He Exclued at : Assault Group. FWAT QHAYUR) Inspector General of Police CID / STE NWFP., PESHAWAR *

e 5252525252525252525 $\neg \neg$ TIER PROVINCE POLICE l Г SOFTH WE 1 L Commendation Certificate Class I Granted by an AMIN HASHIM F SWAT nfpi HC: Driver Said Muhammad No: 80 1 То lΓ N N N N Π. Son of <u>at to he</u> Shangla District Л True Copy IJ ្បា _П in Recognition of n. L Ľ Π Good Performance of duty Π Cash Leward Rs: 300/2 No 4904-Députy Inspector General of Police Date 22 Region - III Saidu Sharif Dy: Inspector SMR4al of Police Region-III at, Saidu Sharif Swat C 5 с 5 7 1è

ï thet Pakhtunkhha **Commendation** Certificate **CLASS III** Mahmond P. M. Japa. asal То in Recognition of good performance in recovery of for his. Amus, and Narcatics etc. Cash reward Rs. 1000/ 223 No. District Police Officer Date 1 . 11 . 0 / 1 Swat



Commendation Certificate II

is awarded to

Cash Reward Rs.100/-

Const. 80 Said Mehmood of Shangla



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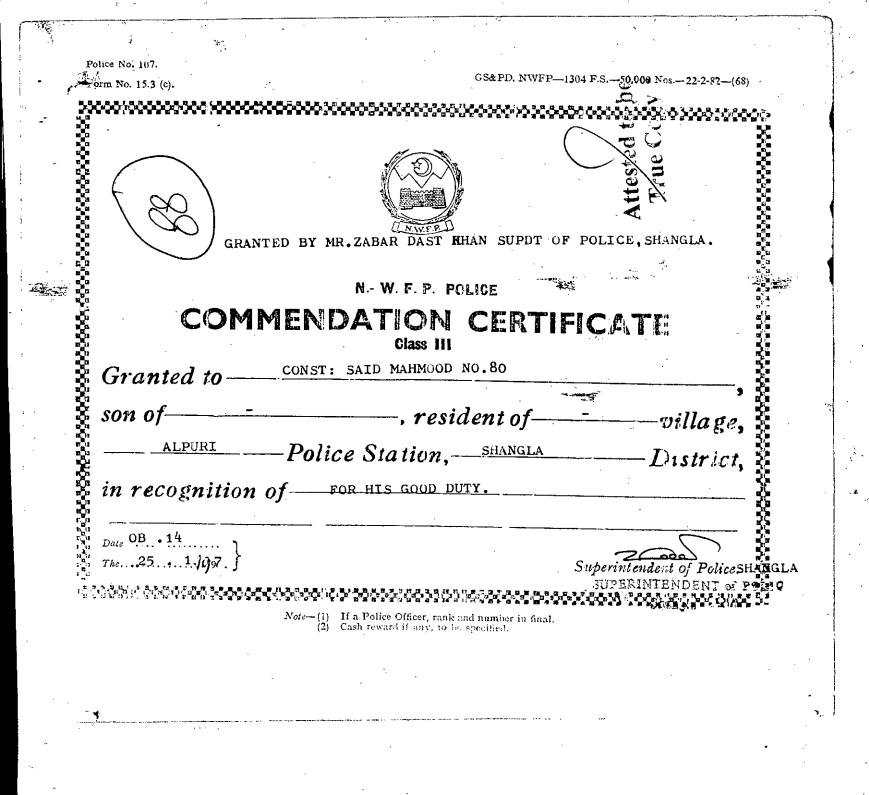
in recognition of

smart turn out and brisk drill movement while forming part of Passing Out and Attestation Parade held at PTC Hangu on the 13th October 1999 and reviewed by Commandant PTC Hangu.

Dated: 10th November 1999. Order Book No: 376 Attested to be /////// True Copalman Syed Mubammad.ppm.psp.big Commandant

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rm No. 15.3 (c)	· 	4.		۰.
<u>, skokokokokokokoko</u>	*****	******	*****	******
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son of		
	Police Station,seamona	District, 🎇
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Police No. 167.	GS&PD. NWFP3	09 F.5.—50,000 F.—3-1-88 -(19)
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	NW. F. P. POLICE.	
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S COMME	ENDATION CERTIF	ICATE
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son of	CONSTABLE SAID MEHMOOD NO.80 , resident of Police Station, his good duty Cash Reward Rs.100/-	District,
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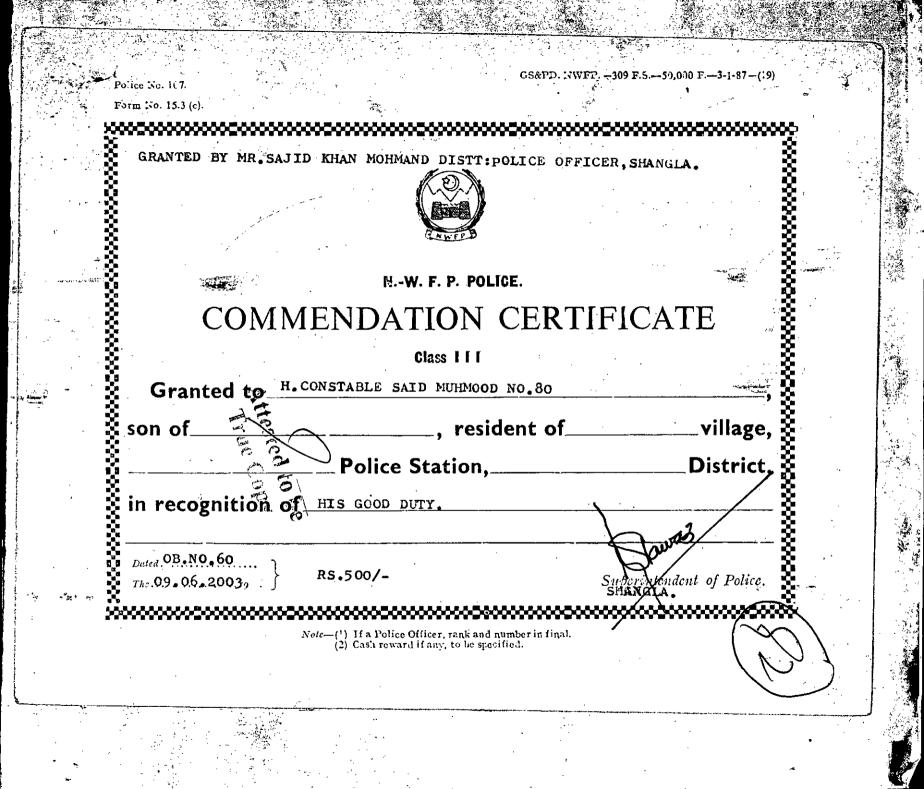
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Police No. 107 Form No. 15.3 (c) ********* 米 米 ************ N.W.F.P. POLICE **COMMENDATION CERTIFICATE** CLASS III GRANTED BY MR.ZABAR DAST KHAN, SUPDT: OF POLICE, SHANGLA. ****** CONSTABLE SATD MAHMOOD NO.80. Gränteð Village District, LILOWNAI Son o GU MUHAMMAD Police Station, SHANGLA AL PURT k in recognition of ______ Laudable performance between the night 12/13.8.97 米 on night gasht duty, on account of heavy Flood Water on * 洣 Ж Chakat Road. O.B. No. 90 With Cash Reward Rs. 100/-⋇ Sr. Subdt of Police Sulta 米 Alpural



Quet mil CERTUSIC ANT 10 Class III Granted by GRANTED BY MR. SAJID KHAN MEHMAND SUPDT: OF POLICE, SHANGLA. Granted etas SAID MEHMOOD NO.80/L.H.C. _____ R/. - • S/。 Police Station ____ GUNER S.P. SHANGLA District SHANGLA In recognition of _____FOR HIS GOOD PERFORMANCE DURING THE REFRENDUM 2002. CASH REWARD Rs: 700/-Superintendient of Police Superintendent of Police Shangla at Alpuri. O.B. No. 37 Dated : _______.5.2002.

	NW. F. P. POLICE.		
	MMENDATION C		
3011 01 3	Class III to <u>H.C SAID MEHMOOD NO.80</u> , resider		1 (A)
	PfSturgenPolice Station, on of HIS GOOD DUTY.	DD ^ א	istrict, X
British	$\left.\begin{array}{c} \\ \\ \\ \\ \\ \\ \\ \end{array}\right\}  Cash Reward Rs.500/-$	Superintendent Superistancela SHANGLA AT A	of Police.
<i>The</i>	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		

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in recogn		Police Station,_	Office	District	
Dated 31		302/107/34-PPC,PS/			
The Rs=100/-	•			intraient of Police.	
	Note	<ul> <li>(1) If a Police Officer, rank and nu</li> <li>(2) Cash reward if any, to be specif</li> </ul>	umber in final.	Shuogla	
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Image: Constraint of the state of the s	Ţ	<u> </u>	Police No.107. Form No.15.3 (c)
COMMENDATION CERTIFICATE         GRANTED BY MR, MUHAMMAD IQBAL KHAN MARWAT D.F.O. SHANGLA.         Granted to       HC SAID MEHMOOD         Son of       LATE GUL MUHAMMAD         Resident of       LILOWNAI         Village         ALPURI       Police Station         SHANGLA       District         im*recognition of       For his good duty.         Date      Q3Q12009.         W/Cash reward Rs.600/-       Suportification         Suportification       Suportification         Note:- (I) If a Police Officer rank and number in filled.WGLA.       Image: Comparison of filled.WGLA.			
ALPURI       Police Station       SHANGLA       District         im recognition of       For his good duty.       District         DateQ3.01.2009.       W/Cash reward Rs.600/-       Support interviewed and the state of	-		GRANTED BY MR, MUHAMMAD IQBAL KHAN MARWAT D.F.O. SHANG
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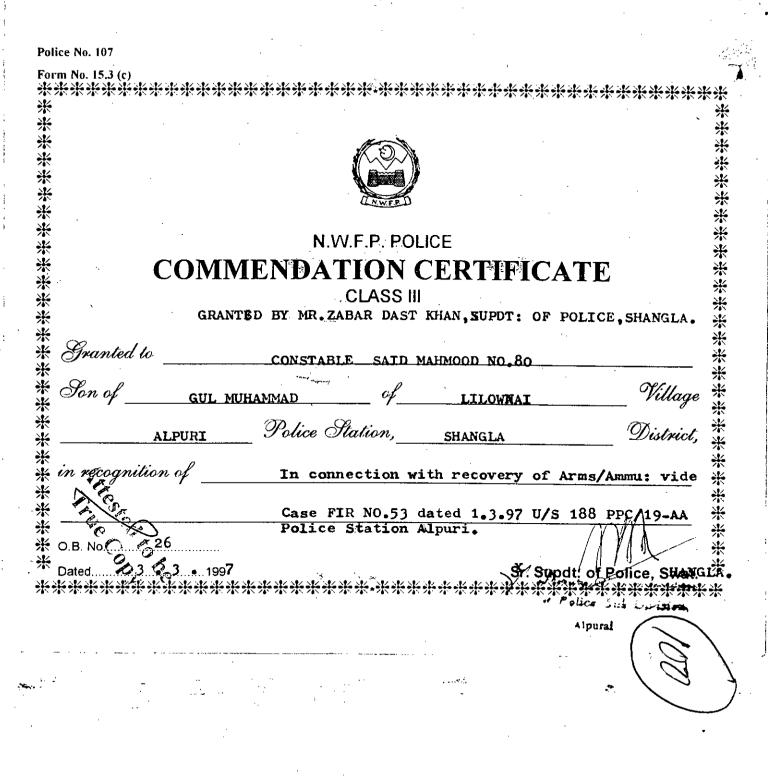
	orm No. 15.3 (c) ************************************
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** **	NW. F. P. POLICE
Š	COMMENDATION CERTIFICATE
૾ૢ૽ૻ	Granted to HEAD CONSTABLE SAID MEHMOOD NO.80.
R	Son of Resident of LILOWNAL Village
૾ૺઽ	S ALPURT Police Station SHANGLA District
्रुष्ट	in recognition ofFOR HIS GOOD PERFORMANCE VIDE CASE FIR ND.43,44
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	DATED 25.8.2005 U/S 13 AO POLICE STATION ALPURI
Š	O.B. No67
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	(2) Cash reward, if any to be specified.

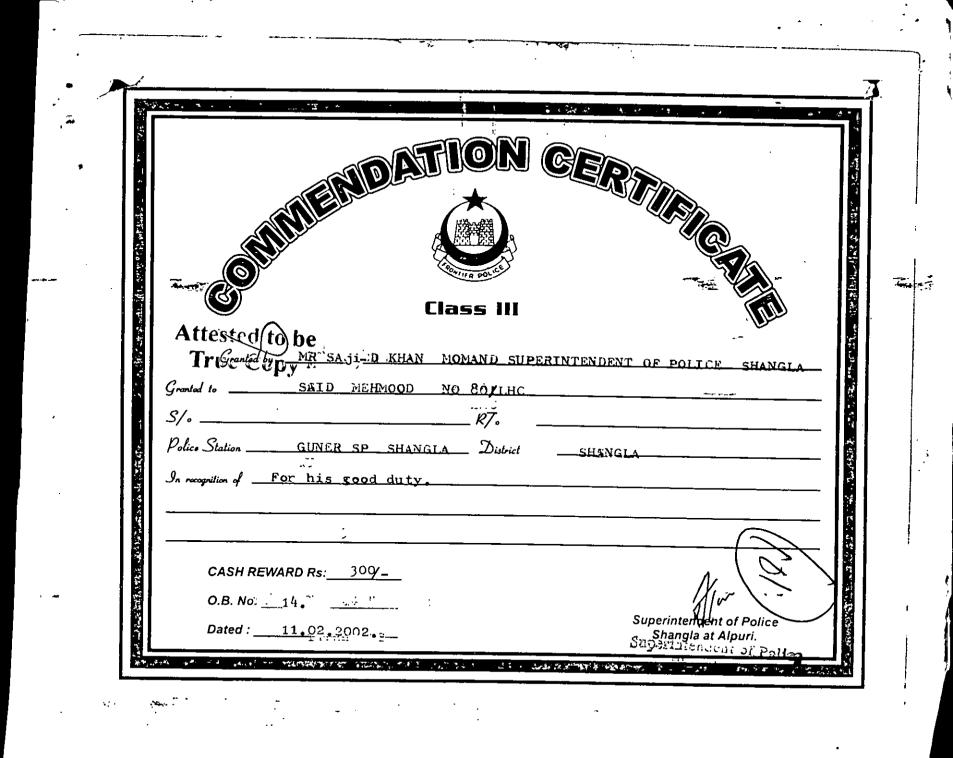
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Police No. 107 Form No. 15.3 (c) Granted a.C.C Class III by Superintendent of Police, Shangla at Alpuri. 米 米 米 米 ****** N.W.F.P. POLICE **COMMENDATION CERTIFICATE** CLASS III ******* Granted to _____ Constable Said Mohammad No.80 Son of _ Village District ol Lilowani Police Station, Shangla 16310 THE Alpuri * in recognition of with the arrest of Pos vide Case FIR No.30 dated U/S 302/109/34 QDO POLICE STATION ALOCH ĝ Cash Reward Rs= 10/-* O.B. No......143 Dated 24.12.99 199 8 Sr. Supdt of Police, Swat. Superin Police,

ž CERTINELCE ATION Class III Granted by Mr, Alam Zeb Khan Superintendent of Police Shangla at Alpuri. LHC Said Mahmood No.80. Granted to _ _____ R/. S/. _____ Shangla. Besham District Police Station ____ For his good performance in the arrest of P.O and recovered In recognition of ____ 2 chargers and one Shot Guns 12 bore wanted in case FIR No.71/ Atton U/S 302/148/149-PPC Police Station Besham. CASH REWARD RS 100/fent of Police O.B. No. __ Shangla at Alpuri. 29.9.2001. Dated : Superintendent of Po .**

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AKALAT NAMA

IN THE COURT O aid Rmooo Appellant(s)/Petitioner(s)

Respondent(s)

1/We do hereby appoint Mr. Khai/Rehman, Advocate in the above mentioned case, to do all or any of thellowing acts, deeds and things.

VERSUS

 fappear, act and plead for mc/us in the above mentioned case in /s Court/Tribunal in which the same may be tried or heard and /y other proceedings arising out of or connected therewith.

2 To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.

3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this

Attested & Accepted b Signature of Executants Khaled Rehman, Advocate, Peshawar.

Before the IPPK Service Tribunal Peshawar Service Appeal No 890/2015 Said Mahmood VS P. Po & others withdrawal of Appeal: Subject: S.V.P.Provide Porvice Tribuscu Bary No_12 Respected Sir. 18-2-16 That the case of the appellant is pending before the Comp Court Swat in which the next date is Fixed 7-4-2016. for written seeply. That the appellant has been reinstated by the Review Police Board 2 (Respondent Departimet). That the instead appeal many bindly be with drawn. Pin Put when and the stand the Said mahanood Ex-51. 18/2/2016

peshawar Service Appeal No 890/2015 Said Mahmood. 15 P. Po & other Withdrawal of Appeal: Subject: Respected Six. That the case of the appellant is pending befor the comp Court Swint in which the next date is fixed 7-4-2016. for writtin safely. That the appellant has been som ted by the Review Police Board 2 (Respondent Departimit). That the instead appeal many reind be with drawn. Rand Said mahmood Ex-51: 18/2/2016

peshawar Service Appeal No 890/2015 Said Mahmood VS P. Po & other Withdrawal of Appeal: Subject: Responted Sir. That the case of the appelled is pending before the comp Court Swat in which the next date is Fixed 7-4-2016. for written supply. That the appelliant has been seen ted by the Review Police Board 2 (Respondent Deportund). That the instead appeal many reind be with drawn. Pan Said mahmood Ex-51. 18/2/2016

Service Appeal No 890/2015 Said Malmood VS P. Pole other withdrawal of Appeal: Subject: Respected Sir. That the case of the appallant is pending befor the comp Court Swat in which the next date is Fixed 7-4-Jo16. For written seeply. That the appellant has been seen ted by the Review Police Boom (Respondent Department). That the instead appeal many wind be with drawn. Pan Said mahmood Ex-51: 18/2/2016