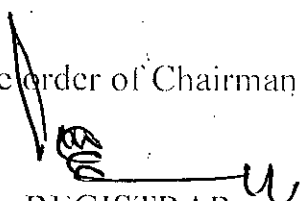


FORM OF ORDER SHEET

Court of _____

Case No.- _____

810/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/04/2023	<p>The appeal of Mr. Umar Farooq presented today by Mr. Muhammad Usman Khan Turlandi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>12-4-23</u>. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

(A)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

In Ref: to Service Appeal No. 810/2023.

Umar Farooq, Ex-PASIVERSUS.....PPO etc.

I N D E X

S. #	DESCRIPTION OF DOCUMENTS	ANNEX	P.NO.
1.	Main Service Appeal.	----	01-06
2.	Affidavit.	----	07
3.	Addresses of Parties.	----	08
4.	Copy of the 1 st appointment order as PASI,	"A"	09-10
5.	Copy of the Clearance Certificate by the local Police.	"B"	11-14
6.	Copy of the Medical Fitness Certificate.	"C"	15
7.	Copy of the Arrival and daily Diary Report.	"D"	16-17
8.	Copy of the FIR No. 97 dated 12-01-2020.	"E"	18
9.	Copy of the FIR No. 102 dated 13-01-2020.	"E/1"	19-20
10.	Court Statement of the Complainant in FIR No. 97.	"F"	21
11.	Copy of Confirmation of BBA in FIR No. 97.	"F/1"	22-24
12.	Copy of Confirmation of BBA in FIR No. 102.	"G"	25-27
13.	Copy of the Complaint.	"H"	28-33
14.	Copy of the enquiry proceedings.	"H/1"	34-37
15.	Official letter dated 22-09-2022 for Recruit Training.	"I"	38-40
16.	Order-sheet dated 13-12-2022 in WP No. 4926/2022	"J"	41-42
17.	Copy of the impugned order dated 22-12-2022	"K"	43
18.	Copy of the departmental Appeal dated 24-12-2023.	"L"	44-47
19.	Vokalatnama.		48

APPELLANT

U. Farooq
(Umar Farooq, Ex-PASI)

Through;

Dated: 10 /04/2023.
(MONDAY)

Muhammad Usman Khan
Muhammad Usman Khan
Turlandi
Advocate Peshawar. (bc No. 10-7472)
CNIC No.17301-1723606-3
E-mail usmanturlandi@Gmail.com

Dawood Khan
Dawood Khan
Advocate Peshawar.

OFFICE: Flat # C-1 Haji Murad Plaza, Dalazak Road, Peshawar City.
Cell# 0333-9153699 *** 0300-5895841

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

In Ref: to Service Appeal No. 810/2023.

Umar Farooq, Ex-PASI (Probationer Assistant Sub-Inspector Police), R/O
House No. 4881, Mohallah Musa Khan, Kohat Road, Bana Mari, Peshawar.
.....**APPELLANT.**

VERSUS

- 1) The Provincial Police Officer, Khyber Pakhtunkhwa, Central Police Office,
Peshawar.
- 2) The Capital City Police Officer, Peshawar.**RESPONDENTS.**

**SERVICE APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE
ORIGINAL IMPUGNED REMOVAL ORDER OF THE APPELLANT FROM SERVICE
DATED 22-12-2022, PASSED BY THE RESPONDENT NO. 2 AND WHEREAS THE
DEPARTMENTAL REPRESENTATION DATED 24-12-2022 WAS NOT YET
RESPONDED DESPITE THE STAPULATED PERIOD AS REQUIRED BY THE LAW
HAS BEEN ELAPSED.**

**PRAYERS IN APPEAL:- ON ACCEPTANCE OF THIS APPEAL, THE ORIGINAL
IMPUGNED ORDER DATED 22-12-2022, PASSED BY THE RESPONDENT NO. 2,
WHEREBY THE APPELLANT WAS REMOVED FROM HIS RESPECTIVE SERVICES
AS PASI, MAY BE SET-ASIDE AND HE MAY BE REINSTATED IN SERVICES WITH
ALL CONSEQUENTIAL BACK BENEFITS, SENIORITY etc. ENABLING HIM TO GET
EQUAL TREATMENT LIKE HIS COLLEAGUES, SIMULTANEOUSLY RECRUITED AS
SUCH VIDE ORDER DATED 24-05-2022.**

May it please this Honorable Tribunal

The Appellant very earnestly seeks redressal of his grievances through the instant
Service Appeal as under:-

Facts leading to this Service Appeal

- 1) That the Appellant is a bonafide citizen of the Islamic Republic of
Pakistan, domiciled in Khyber Pakhtunkhwa province, resident of village
Bhana Mari, Peshawar, belongs to a respectable/law-abiding family of

the locality and has every fundamental rights enjoined by the Constitution of the Country to be enforced in his favor.

- 2) **That** in response to an advertisement, published in the daily News-Papers, the Appellant, being well equipped with all the pre-requisite qualifications, formulated by the Provincial Public Service Commission, applied for the post of Probationer Assistant Sub-Inspector Police (PASI) and was succeeded to get the desired Recommendation accordingly for recruitment as such.
- 3) **That** in pursuance to the recommendations made by the Provincial Public Service Commission, proper recruitment order against the post of PASI was passed wherein the name of the Appellant was figured at Sr. No. 19 and was also allotted Belt # 500. In furtherance to the appointment order, the Appellant after getting his Clearance from the local Police, Medical Fitness, did reported his arrival vide Mad No. 23 dated 30-05-2022 of the daily Diary maintained by the Police-Line Peshawar and since then, punctually & regularly performing his respective duty with great zeal, zest and enthusiasm. (Copy of the 1st appointment order as PASI (Annexure "A"), Clearance by the local Police (Annexure "B"), Medical Fitness Certificate (Annexure "C") and Arrival/Daily Diary Report is annexure "D" respectively).
- 4) **That** as a result of some Civil litigation, a chronic litigant being ill-wisher of the appellant was succeeded to book down the Appellant along with all male members of his entire family in fabricated, engineered, concocted and frivolous Criminal cases vide FIR No. 97 dated 12-01-2020 and FIR No.102 dated 13-01-2020 of PS Bhana-Mari in order to stigmatize the character role and deprive the Appellant of his lawful job in future. (Copy of the FIR No. 97 dated 12-01-2020 and FIR No.102 dated 13-01-2020 of P.S Bhana-Mari is annexure "E" & "E/1" respectively).
- 5) **That** the Appellant in order to secure his newly esteemed job and to save his skin from unnecessary, uncalled and well-engineered litigation, entered into Compromise and succeeded to get his BBA confirmed in both the cases ibid. (Copy of the Court Statement of the Complainant regarding compromise and confirmation order of BBA thereon in both the cases ibid is annexure "F", "F/1" & "G" respectively).

- 6) That after effecting compromise with the Appellant, even then, the complainant, when could not achieve his desirous aim to stigmatize the Character role and to deprive the Appellant of his Constitutional right of lawful profession, did not keep his skin-free and submitted subsequently one another Complaint to the respondent No. 2 just to deprive the Appellant of his Clearance Certificate, mandated for the newly Job of PASI whereas an enquiry was lunched against the police official of PS Bhana-Mari. (Copy of the Complaint and enquiry proceedings thereon is annexure "H" & "H/1" respectively).
- 7) That in the meanwhile, the newly recruited / untrained PASIs were nominated for 01 year Basic Recruit Training vide order dated 22-09-2022 but astonishingly the Appellant was left and excluded as such on the pretext of pending his so-called criminal cases. (Copy of the order dated 22-09-2022, excluding the Appellant from Basic Recruit Training is annexure "I").
- 8) That in the given painful scenario, the Appellant, while aggrieved of his fate of discrimination in service for not selecting and nominating him to 01 year Basic Recruit Training Course and while having no other adequate remedy available in the circumstances of the case, filed a Writ Petition No. 4926/2022 wherein Comments of the respondents were called for 22-12-2022. (Copy of the order-sheet dated 13-12-2022 is annexure "J").
- 9) That on 22-12-2022, when the Writ Petition No. 4926/2022 was fixed for hearing. The original impugned order of removal of the appellant from service was penned/passed very hastily by the respondent No. 2. (Copy of the original impugned order dated 22-12-2022 is annexure "K").
- 10) That the appellant while aggrieved of the original impugned order dated 22-12-2022, filed departmental Appeal before the respondent No. 1 dated 24-12-2023 through Registered Post but no response in either way till the expiry of the stipulated period for disposal of Appeal was communicated yet. (Copy of the departmental Appeal duly registered dated 24-12-2023 is annexure "L").
- 11) That in the given scenario, the appellant while aggrieved of the colorful authority exercised by the respondents in a very hastily manner and without conducting any formal inquiry by violating the law on the

subject and by removing him from service as such, is constrained to approach this august Tribunal for his reinstatement in service and redressal of his grievances inter-alia on the following grounds.

Grounds Warranting this Appeal:-

- a) **Because** the impugned order has been passed in the exercise of colorful authority which is illegal, unlawful, without lawful authority, without jurisdiction, un-Islamic, un-constitutional, against the law on the subject and against the norms of equity and natural justice, hence liable to be reversed:
- b) **Because** 12-18 of Police Rules 1934 provides that "The Character and suitability for recruitment of every recruit shall be ascertained by the reference to the Lamberdar of the village or the Ward member of the Town of which the recruit is the resident. A search slip shall also be sent to the finger print bureau in order to establish his freedom or otherwise from conviction. Such Lamberdar or the Ward member shall, if the recruit is a good Character, furnish a certificate to the effect, which shall be verified and attested by the sub-Inspector, In-charge of the local Police Station. The Sub-Inspector shall also complete the information required by 12-18 (1)" of Police Rules 1934.
- c) **Because** a bird eye view at 12-18 Police Rules 1934 would reveal about "Conviction" of a recruit and no mentioning about the pending of any reference or any criminal case against him and the Appellant should never have been denied his basic Recruit Course/Training who has never been convicted in any criminal case till date and who has been given clear Character role verification by the concerned Police Station and as such was legally entitled to be sent for basic Recruit Course/Training in order to save his fundamental rights, guaranteed by the Constitution to be treated in accordance with law.
- d) **Because** no regular inquiry, as mandated by the law on the subject, has ever been conducted, no statement of PWs or DWs have been recorded and similarly no Charge-Sheet whatsoever was served upon the appellant and major penalty has been

imposed in a slip- shod manner which is not sustainable in the eyes of law.

- e) **Because** the Appellant being fresh recruited PASI, had to participate in the basic Recruit Course/Training but the authority has dropped him on flimsy ground of pending a criminal case against the Appellant and as such, pending a criminal case could not be a ground for denying the right of basic Recruit Course/Training to a fresh recruited PASI.
- f) **Because** it is the settled law that a person is presumed innocent until found guilty by the competent court of law on the conclusion of his trial and convicted as such.
- g) **Because** the Appellant being duly fresh recruited PASI has wrongly been prevented from his basic Recruit Course/Training to get his seniority/promotion and discharge his higher responsibility as a result of which he was deprived of his legitimate right of seniority/ promotion, more so, subsequently removed him from service in such scenario.
- h) **Because** the Appellant has been penalized for no fault on his part and his contention has not been given due weight and there is no evidence whatsoever to substantiate the guilt of the Appellant if any.
- i) **Because** prior to the impugned order no chance of personnel hearing has ever been bestowed upon the Appellant and it is the demand of natural justice that no one should be condemned unheard.
- j) **Because** AUDI ALTERAM PARTEM has not been resorted to which is the fundamental natural justice rule that no one should be condemned unheard but conversely on the back of the appellant, the major penalty was imposed for no fault on his part.
- k) **Because** the act of the respondents, neglecting and refusing the right of the appellant of fair and transparent regular enquiry and as such condemned him unheard which is also against the divine ordain of Allah Almighty as under the principle of natural justice and fundamental human rights, the respondents have usurped the right of a human being and have thus bypassed the divine rule to give everyone his due right.

6

l) **Because** the act of the respondents are also violated of Article 03, 04, 08, 09, 10-A, 25 and 27 of the Constitution of Islamic of Pakistan 1973.

m) **Because** further submissions with the prior permission of this august Tribunal will be advanced at the time of regular hearing the appellant at the bar.

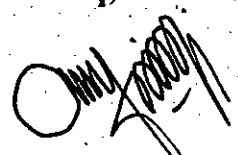
PRAYERS IN APPEAL:- on acceptance of this appeal, the original impugned order dated 22-12-2022, passed by the respondent no. 2, whereby the appellant was removed from his respective services as PASI, may be set-aside and he may be reinstated in services with all consequential back benefits, seniority etc. enabling him to get equal treatment like his colleagues, simultaneously recruited jointly as such vide order dated 24-05-2022.

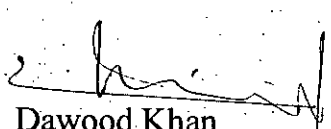
Any other relief, not specifically prayed for, may also graciously be granted, if appears just, necessary and appropriate.

APPELLANT
(Umar Farooq, Ex-PASI)

Through:

Dated: 10 /04/2023.
(MONDAY)


Muhammad Usman Khan
Turlandi
Advocate Supreme Court of Pakistan.


Dawood Khan
Advocate Peshawar.

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

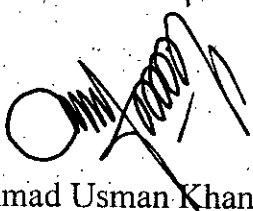
In Ref: to Service Appeal No. _____/2023.

Umar Farooq, Ex-PASIVERSUS.....PPO etc.

AFFIDAVIT.


I, **Umar Farooq, Ex-PASI (POLICE)** S/O Umar Daraz
R/O House No. 4881, Mohallah Musa Khan, Kohat Road, Bana Mari,
Peshawar, do hereby solemnly affirm and declare on oath that the contents
of the accompanying Service Appeal are true and correct to the best of my
knowledge and belief and that nothing has been kept secret or concealed
therein from this august Tribunal.

IDENTIFIED BY:



Muhammad Usman Khan
Turlandi
Advocate Peshawar. (bc No. 10-7472)
CNIC No.17301-1723606-3
E-mail usmanturlandi@gmail.com

DEPONENT:


Umar Farooq, Ex-PASI
(POLICE)
CNIC No. 17301-3945233-5
Contact # 0313-7404023

8

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

In Ref: to Service Appeal No. _____/2023.

Umar Farooq, Ex-PASIVERSUS.....PPO etc.

MEMO OF ADDRESSES

APPELLANT

Umar Farooq, Ex-PASI (Police) S/O Umar Daraz R/O House No. 4881,
Mohallah Musa Khan, Kohat Road, Bhana Mari, Peshawar.

VERSUS

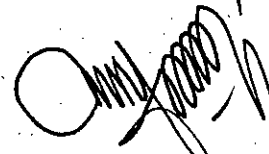
RESPONDENTS.

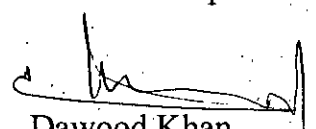
- 1) The Provincial Police Officer, Khyber Pakhtunkhwa, Central Police Office,
Peshawar.
- 2) The Capital City Police Officer, Peshawar.


APPELLANT

(Umar Farooq, Ex-PASI)

Through:


Muhammad Usman Khan
Turlandi
Advocate Supreme Court of Pakistan.


Dawood Khan
Advocate Peshawar.

9

ANNEXURE A

POLICE DEPTT:

U.P. PESHAWAR

Annex-A

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE PART-II.
ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

Dated 24/05/2022.

EC-I, APPOINTMENT AS PROBATIONER ASSISTANT SUB-INSPECTORS:-

In consequence upon recommendation of Khyber Pakhtunkhwa, Public Service Commission Peshawar vide letter No. PSC-ASI-EXAM-04-2018/025195, dated 18-04-2022 and approved by the Inspector General Police Khyber Pakhtunkhwa, Peshawar vide letter No. 900-07/E-III, dated 13-05-2022, the following candidates are hereby appointed as PASIs (BPS-11) against the 25% allotted Share for direct recruitment in Police Department against existing vacancies with effect from the date when they assumed the charges of higher responsibility on a three year probationer period subject to Medical Fitness, Verification of Antecedent and verification of documents/testimonials from the concerned Board/University under the relevant rules and prescribed manner:-

They are allotted CCP, Peshawar Numbers noted against each:-

No.	Name & father names	CCP, Number
1.	Haider Ghani s/o Abdul Ghani	480/P
2.	Ijaz Ali s/o Ihsan Ullah	481/P
3.	Ijaz Hussain s/o Dildar Hussain	482/P
4.	Jamal Shah s/o Jehangir Shah	483/P
5.	Jehangir Khan s/o Noor Khaliq	484/P
6.	Junaid Ihsan s/o Ihsan Ullah	485/P
7.	Kashan s/o Muhammad Tariq Parvez	486/P
8.	Mehran Khan s/o Sadat Khan	487/P
9.	Muhammad Aakif s/o Muhammad Shah	488/P
10.	Muhammad Alamash s/o Tariq Sohail	489/P
11.	Muhammad Ayaz s/o Ghulam Rasool	490/P
12.	Muhammad Bilal s/o Fazal Kamal	491/P
13.	Muhammad Imran s/o Firdous Khan	492/P
14.	Muhammad Zaid Khaliq s/o Irshad Khan	493/P
15.	Muhammad Zuhair Khaliq s/o Muhammad Zahir Shah	494/P
16.	Rizwanullah s/o Mujahid Khan	495/P
17.	Shehzad Khan s/o Misat Khan	496/P
18.	Tahir Junaid Khan s/o Muhammad Ullah Khan	497/P
19.	Umar Farooq s/o Umar Daraz	498/P
20.	Usman Ghani s/o Hasham Gul	499/P
21.	Wahid Ullah s/o Akhtar Munir	500/P
22.	Yasir Afzal s/o Khan Afzal	501/P
23.	Yasir Khan s/o Dad Khan	502/P
24.	Zia-Ur-Renman s/o Ajeem Khan	503/P
25.	Zulfarnain s/o Dost Muhammad	504/P

CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 9830-35 /EC-I

Copy of above is forwarded for information and necessary action to the:-

- Inspector General of Police Khyber Pakhtunkhwa, Peshawar w/r to his memo No. 900-07/E-III dated 13-05-2022.
- Director Examination KPK Public Service Commission.
- SSSP/Operations & Investigation, Peshawar.
- EC-II, Peshawar. Their applications alongwith other relevant documents are sent herewith for placing in their Character Roll/Service Roll with the direction subject to Medical Fitness, Verification of Antecedent and verification of documents/testimonials from the concerned Board/University

TESTED TO BE
TRUE COPY

Muhammad Usman Khan
Turlandi
Advocate Supreme Court
of Pakistan. No: 504

10

BETTER COPY

BETTER / LEGIBLE COPY

44

POLICE DEPTT:

CCP, PESHAWAR

**FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE PART - II,
ORDES BY THE CAPITAL CITY POLICE OFFICE KHYBER PAKHTUNKHWA, PESHAWAR
NOTIFICATION**

Dated 24/05 / 2022.

No _____ / EX - I, APPOINTMENT AS PROBATIONER ASSISTANT SUB - INSPECTORS:-
Consequent upon recommendation of Khyber Pakhtunkhwa, Public Service Commission Peshawar Vide letter No, PSC-
ASI-EXAM-04-2018/02515, dated 18-04-2022 and approved by the inspector General of Police Khyber Pakhtunkhwa,
Peshawar vide letter No : 900-07/E-III, Dated 13-05-2022, the following candidates are hereby appointed as PASIs (BPS-II)
against the 25% allotted Share for Direct recruitment in police Department against existing vacancies with effect from the
date When they assumed the charges of higher responsibility on a three year probationer period subject to Medical fitness,
Verification of Antecedent and Verification of documents/Testimonials from the concerned Board / University Under the
relevant rules and Prescribed manner:-

They are allotted CCP, Peshwar Numbers Notices, each:-

S.No.	Name & Father Names	CCP, Number
1	Haider Ghani S/O Abdul Ghani	480/P
2	Ijaz Ali S/O Ihsan Ullah	481/P
3	Ijaz Hussain S/O Dilkar Hussain	482/P
4	Jamal Shah S/O Jehangir Shah	483/P
5	Jehangeer Khan S/O Jehangir Shah	484/P
6	Junaid Ihsan S/O Ihsan Ullah	485/P
7	Kashan S/O Muhammad Tariq Parvez	486/P
8	Mehran Khan S/O Sadat Khan	487/P
9	Muhammad Aakif S/O Muhammad Shah	488/P
10	Muhammad Altamash S/O Tariq Sohail	489/P
11	Muhammad Ayaz S/O Ghulam Rasool	490/P
12	Muhammad Bilal S/O Fazal Kamal	492/P
13	Muhammad Imran S/O Firdous Khan	493/P
14	Muhammad Zaid Khalil S/O Irshad Khan	495/P
15	Muhammad Zubair Khalil S/O Muhammad Zahir Shah	469/P
16	Rizwanullah S/O Mujaheed Khan	497/P
17	Shehzad Khan S/O Misal Khan	498/P
18	Tahir Junaid Khan S/O Muhammad Ullah Khan	499/P
19	Umar Farooq S/O Umar Daraz	500/P
20	Usman Ghani S/O Hasham Gul	502/P
21	Wahid Ullah S/O Akhtar Munir	503/P
22	Yasir Afzal S/O Khan Afzal	505/P
23	Yasir Khan S/O Dnd Khan	506/P
24	Zia - Ur - Rehman S/O Aleeem Khan	507/P
25	Zulqarnain S/O Dost Muhammad	508/P

ATTESTED TO BE
TRUE COPY

CAPITAL CITY POLICE OFFICER,
PESHAWAR

NO _____ /EC-I,

Copy of above is forwarded for information and necessary action to the:-

1. Inspector General of Police Khyber Pakhtunkhwa, Peshawar w/r to his memo: No. 900-07/E-III dated 10-05-2022.
2. Director Examination KPK Public Service Commission.
3. SSsP /Operations & Investigation Peshawar.
4. EC-II, Peshawar, Their applications along with other relevant documents are sent herewith for placing in their Character Roll / Service Roll with the direction subject to medical fitness, verification of Antecedent and verification of documents/testimonials from the concerned Board /University

Muhammad Usman Khan
Tribunals
Advocate Supreme Court
of Pakistan. No: 5045

(11)

ANNEXURE B

تاریخ: 12-10-2011

محکمہ پولیس

Annex-B

نقشہ تصدیق چال چلن رنگروٹ بنام محمد رفیق
جو تاریخ 20-05-2011ء سے 20-05-2011ء تک جاری رہا۔

ولدیت: محمد رفیق ذات: گوت مقام: گوت
 ساکن محلہ: گوت پتہ: گوت قصبہ: گوت
 خلیہ: 28 عمر: 28 سال 10 ماہ 23 دن قد: 5 فٹ 10 انچ
 نشانات خاص دائمی قابل شناخت: گوت

تعلیم	حالات	ملازمت					قربی رشتہ داران	
		نام عہدہ خواہ	تاریخ ملازمت	غرض	تاریخ تسلیمی	نام	رہنمائی	
B.S.C Hons in Applied Accounting								

قربی رشتہ داران جو گورنمنٹ ملازمت میں ہیں۔

نام کیا رشتہ ہے	کس عہدہ ہے	کس محکمہ میں ہے	کس مقام پر ہے	کیسٹ
بیٹا	Assistant	In Printing Department	Secretary Peshawar	12

میں مندرجہ بالا اشخاص یا اشخاص با تفصیل اپنا وارث قرار دیتا ہوں، یہ نام مفصل تحریر کریں۔

میں اقرار کرتا ہوں کہ مندرجہ بالا امور ان جو میں درج کرانے ہیں، درست ہیں۔

U. J. Farooq
دستخط یا نشانات / انگشت

17301-3945233-5

0313-7404023

ATTESTED TO BE
TRUE COPY

Muhammad Usman
Tufan
Advocate Supreme Court
of Pakistan, No. 8045

BETTER COPY

Better Copy

ضلع پشاور

نقشہ تصدیق چال چلن ریکورڈ پناک عمر فاروق

جو تاریخ 20-5-2022 سال 2022ء سے بعدہ PASTI بھرت کیا گیا

ولایت مردراز ذات بھٹان کوت سنی مذہب اسلم
مسکن موسیٰ خان بھانہ ماڑی ضلع پشاور تھانہ بھانہ ماڑی ضلع پشاور
خاندان سفید عمر 28 سال 10 م 23 دن 6 گھنٹہ 2 منٹ 12 سیکنڈ
نشانات خاص دائمی قابل تہنات: بائیں ہاتھ بازو پر نشان زخم

تعلیم	حالات		ملازمت		سابقہ		قریبی رشتہ داران	
	تاکید خواہ	تایم ملازمت	طرحہ	تاریخ ملازمت	نما	سکونت		
BSc Honors in Applied Accounting		تر	تا	سال	ماہ	دن	بیٹا بیٹی بیوی والد والدہ	عمر دراز فضیلہ بی

قریبی رشتہ داران جو گرفتار ملازمت میں ہیں۔

تاکید رشتہ ہے	کس عہدہ پر ہے	کس لکھ میں ہے	کس تھا میں ہے	کیفیت
سید کریم (ماموں)	Assistant	Industry Department	Secretariat Peshawar	حاضر سروس

میں مذکور بالا شخص/اشخاص بالتفصیل اپنا وارث قرار دیتا ہوں یہ نام مفصل تحریر کریں۔
ESTED TO BE
RUE COPY

Justice of Peace
District Court
Peshawar
No. 5045

میں اقرار کرتا ہوں کہ مذکور بالا امور ان جو میں درج کر رہے دردت میں۔

sd/- عمر فاروق

دستخط یا نشان انگشت

17301-3945233-5

0313-7404023

(12)

(13)

(14)

از پیش گاہ صاحب سپرنٹنڈنٹ بہادر

بخدمت صاحب سپرنٹنڈنٹ بہادر پولیس

نقشہ ہذا برائے خانہ پری مندرجہ ذیل امور ان کے

تشریح کرنے کے

پاس سب انسپکٹر صاحب تمام

مورنہ 2022-5-30 سال 2022ء

سپرنٹنڈنٹ پولیس

S.P.O

کد

3	2	1
<p>رپورٹ افسر ایچ این دو بارہ مزایا سابقہ چال چلن نسبت مزایا دو چال اگر کوئی ہو شخصیت قومیت وغیرہ</p>	<p>بیان ہمداران نسبت مزایا سابقہ دیر خاکی اگر کوئی ہو شخصیت قومیت بقدر دستخط</p>	<p>نام تعین کنندہ متعلق چال چلن بقدر دستخط</p>
<p>See verified as above 31-05-2022 BM</p> <p>ATTESTED TO BE TRUE COPY</p> <p>Muhammad Usman Khattar Tribunals Advocate Supreme Court of Pakistan. No: 5045</p>	<p>جسٹس رٹائرمنٹ سے تعلق رکھنے والے مقام سے سب سے عمر بڑے عمر دار سب سے کم عمر مقام سے سب سے کم عمر مقام سے سب سے کم عمر 31-05-22 BM</p>	<p>میں نے ذیل کی مقام سے سب سے کم عمر مقام سے سب سے کم عمر 17361-3945233 مقام سے سب سے کم عمر مقام سے سب سے کم عمر مقام سے سب سے کم عمر 31/05/22 Ashfaq Ahmad Assistant Director-II Prosecution, Home Department Khyber Pakhtunkhwa 091-9210995</p>

ضلع پشاور
ضلع پشاور

(14)

از پشنگاہ صاحب سپرنٹنڈنٹ بہادر پولیس

BETTER COPY سپرنٹنڈنٹ بہادر پولیس

تھانہ بھانہ ماڑی

نقشہ پڑا برائے خانہ پوری مندرجہ ذیل اہران کے

پاس سپرنٹنڈنٹ صاحب تھانہ بھانہ ماڑی مرسل ہوئے۔

Sd/-
سپرنٹنڈنٹ پولیس
30-5-2022

540

تھانہ

کلاس ع	ب	ب
فائل تصدیق کنندہ متعلق چال چین بقدر دستخط	بیان نمبر دارانی نسبت سزایابی برساتہ و برخواستگی اگر کوئی ہو شخصیت قومیت بقدر دستخط	رپورٹ افسر انچارج دربارہ سزایابی سزا چال چین نسبت سزایابی و برخواستگی اگر کوئی شخصیت قومیت و نمبر
میں زبردستی، عمر فاروق ولد عمر دراز شناختی نمبر 17301-3945233-5 علاقہ بھانہ ماڑی پشاور کوڑائی طور پر جانتا ہوں۔ جو تین چلن کا مادر ہے کسی غیر اعلیٰ غیر قانونی اعمال میں بالکل ملوث نہ تھا اور نہ ہے	جناب عالی! دیکھاڑ تھانہ پشاور کیگی۔ دیکھاڑ تھانہ سے مہسی عمر فاروق ولد عمر دراز ساکن بھانہ ماڑی پشاور عمر سزایابی ہے رپورٹ نمبر ہے۔ کسی فوجداری نہ ہے میں ٹیلوٹ نہیں ہے۔ Sd/- MM-PS BM 31-5-2022	Sd/- Verified as above ASHO-PS-BM 31-5-2022
Sd/ Ashfaq Ahmad Assistant Director Prosecution Home Dept Khyber Pakhtunkhwa 091-9210995 0333-9210925	جناب عالی! رپورٹ اسٹنٹ ڈائریکٹ ہو ڈیپارٹمنٹ نفع سے کسی عمر فاروق ولد عمر دراز ساکن بھانہ ماڑی پشاور سے متعلق رہا کسی مہیہ ایس ماٹرنہ سے عمر راسی لہہ پشاور دیکھاڑ تھانہ رپورٹ ہے Sd/ ASI PS BM 31-5-2022	ATTESTED TO BE TRUE COPY [Signature] Prosecution Home Dept Khyber Pakhtunkhwa

15

46

ANNEXURE C

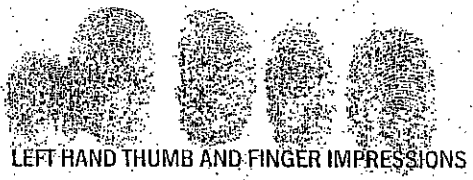
MEDICAL CERTIFICATE

Name of official UMAR FAROOQ
 Caste or race PATHAN
 Father's name UMAR DARAZ
 Residence Bana Mari, Mohallah Musa Khan, House No 4881, Kohat road Peshawar
 Date of birth 7th July, 1993
 Exact height by measurement 5.2"
 Personal mark of identification Born Cut mark on left hand
 Signature of the official [Signature]
 Signature of head of office _____

Seal of office _____

I do hereby certify that I have examined Mr. Umar Farooq a candidate for employment in the Office of the Police department and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except nil

I do not consider this as disqualification for employment in the office of the As above
 His age according to his own statement (28 years) year and by appearance about year 28 years



[Signature]
 MEDICAL SUPERINTENDENT,
 CIVIL HOSPITAL Medical Superintendent
Police Station, Peshawar
24 to 5/22

ATTESTED TO BE

[Signature]

16

17

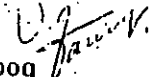
ANNEXURE D

Annex - C

POLICE DEPARTMENT

ARRIVAL REPORT

In compliance with order contained vide CPO Peshawar Letter No 9830-35/EC-1 dated 24/05/2022. I, Umar Farooq S/o Umar Daraz hereby submit my arrival report to capital city Police Office Peshawar today on 26-05-2022, Thursday Morning.


Umar Farooq


Recommendee for appointment

As PASI

Capital City Police Peshawar.

0313-7404023

ATTESTED TO BE
TRUE COPY


Muhammad Usman Khan
Turlandi
Advocate Supreme Court
of Pakistan

(17)

(18)

۲۳ - ۳۰ ۰۵
۰۲۱

کلیه برساند

از حضور در عدالت

سید اسد علی رضا صاحب مدعا وقت ۱۱:۰۵ بج معین ۳۰ ۰۵
۰۲۱ اس وقت

مدعی حاضری

دکتر محمد علی آرژوندی بشارت EC-I نبری ۹۸۳۵-۳۵
۲۴-۵-۲۲

ملان خان (۱) ذوالقدر تپین ولد دوست ولد (۲) عمر فاروق

ولد عبدالرازق (۳) درویش ولد اسد علی (۴) علی شاه ولد

محمد نیکو شاه (۵) سید زینت ولد عبدالغنی (۶) شهباز ولد

میرزاخان (۷) محمد زید علی ولد اسد علی (۸) کاشان

ولد طاهر پرویز (۹) محمد آواز ولد عسکری رسول (۱۰) عثمان بی

ولد کاشف علی (۱۱) میاں عبدالرحمن ولد علی محمد خان (۱۲) محمد عثمان

ولد فریدون خان (۱۳) محمد نیکو خان ولد اسد علی (۱۴)

اسد علی احمد ولد خان احمد علی مطهری، سید محمد علی

محمد علی بیگ ولد اسد علی (۱۵) اسد علی احمد ولد اسد علی

حاضر در عدالت سید اسد علی رضا صاحب مدعا وقت ۱۱:۰۵ بج معین ۳۰ ۰۵
۰۲۱

تکمیل دفتر EC-I شود ۱۱:۰۵ بج معین ۳۰ ۰۵
۰۲۱

صاحب عالی

محمد علی احمد

(Signature)

mmp

۳۰/۰۵/۲۲

ATTESTED TO BE TRUE COPY

Muhammad Usman Khan
Turkani
Advocate Supreme Court
of Pakistan. No: 5045

Mob. 0300 5877743

پتہ: بل پشیم، سید احمد علی، قریب طارق خان۔ عدلی طارق خان

NIC 16101 3895203-1

تہذیبیہ (1)

VC-01

P-7

S-97

ابتدائی اطلاعی رپورٹ

بتدرجہ اطلاع نسبت جرم قتل دست اندازی پوسٹ۔ پوسٹ سندھویہ، قریب 53 مجموعہ سائبر سٹیٹس، پشیم

فائل
Annex-D

تاریخ وقت	97
تھانہ مارٹی	
تھانہ	

10	تاریخ وقت رپورٹ	12 01 وقت 19:10 بج
1	نام و کنوت اطلاع دہندہ و مشنٹ	طارق خان ولد فتح محمد طارق خان ساکن مردان حال ٹیبلٹ نمبر 2 لک در صدر
2	مختصر کیفیت جرم (معدومہ) مال اگر کچھ لایا گیا ہے۔	392 397 506 427 148 149
3	جانے وقوعہ کا علاقہ سے درست	بلاٹ ازان عدلی واقع بالمقابل غلمہ گودام کوھاٹ روڈ
4	نام و کنوت لڑم	انجینئر (2) دراز (3) طارق (4) ہمارق (5) عمر (6) سلمان (7) سعید عرف شہریہ
5	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو، تاوقتہ بیان کردہ پیش کردہ تحریریں درخواست ہر قدم درج رکھ لیا	
6	قائد سے روائی کی تاریخ وقت	بہر صیقل عماد

ابتدائی اطلاع نیچے درج کرو۔ وقت صدر نیچے حسدیت خانہ نمبر 2 نے جانے کر تحریریں درخواست پیش کی جو بہ مقنون ذیل ہے بحضرت صاحب SAs 540 صاحب قمانہ مارٹی درخواست مجدد اندر FIR نمبر خلاف 4 نمبر دراز عرف دراز نے ہی امیر نواز وادرا (3) طارق (4) ہمارق (5) عمر پسران عمر دراز عرف دراز نے ہی سلمان ولدنا معلوم کن حید (6) سعید عرف شہریہ وادرا معلوم کن مین امیر نواز (8) نیکی محمد عرف نیکی ولدنا معلوم کن نیکی صاحب عالی ساکن زیل عرفین رسال ہے 4 یہ کہ مسائل ایک عدد بلاٹ نمبر 18 اتہام واقع با ضابطہ عدلیہ سال 2017ء سے مالک صاحب اور متحدہ چلا آ رہا ہے ہی یہ کہ آج بخورم 09:00:00 من مسائل کے چوبیدار اختیار اختیار نہ ذرا ہم جو بائیں حقہ اللہ دی کہ رات 02:00 بجے صلیان 4 عرف دراز نے ہی امیر نواز پسران میں پوری طارق (4) ہمارق (5) عمر پسران عمر دراز عرف دراز نے ہی سلمان ولدنا معلوم کن سعید عرف شہریہ ولدنا معلوم کن نیکی محمد عرف نیکی ولد بلاٹ مذکورہ میں صلح ملاحظہ نہ ہو رہی رہتی داخل ہوئے اور بلاٹ مذکورہ کی تمام دیواریاں گرائی اور جاتے ہوئے بلاٹ مذکورہ میں پورے تمام جسمیاتی سامان جو حالت میں 3 لاکھ روپے سے زیادہ تھی وہ کبھی ملزجان مذکورہ نے اسٹیم کی ٹوک نے میں ڈال کر اپنے ساتھ لے گئے وہ غبار یہ ہے کہ مذکورہ بالا کان چھو سے کھتہ وہاں واقعہ کرتے ہیں جس کے لئے میں تیار نہیں ہوں برائے رپورٹ کرنے آیا میں صہریہ رپورٹ ملنے جاوے دستخط انگریزی العارض طارق خان ولد فتح محمد خان ساکن مردان حال ٹیبلٹ لکھی اور صدر کارروائی قمانہ پیش کردہ تحریریں درخواست صرف بہ صرف درج بالا نمبر درخواست سے صورت جرم بالا کی بائی جا کر مقدمہ بمجرم یا 7 برضرف ملزجان یا درج رجسٹریشن نمبر بقول پر یہ جاتے ہیں درخواست بعض لٹیشن خواہم ہدایت خان کیا جاتا ہے پرچہ گزارش ہے

زیر سزا زمانہ قمر آباد

MASI P.S. BM
12-01-2020

7/12/2022

0300 5877743

طابق کا

20

ذمہ داری (1) 05

ابتدائی اطلاعی رپورٹ

Annexure E/I

ذمہ داری ثبت قلم دست اور ان پختہ رپورٹ سہ روزہ نمبر 131 مجموعہ سٹاٹسٹیکل

VC-01
P-8
S-102

مقام جاری
152

تاریخ وقت رپورٹ
13 وقت 17:40 بجے

نام و کنٹ اطلاعات ہندوستان
مقام کیفیت جرم (معدومہ) مال اگر ہو گیا کیا ہے۔

پلاٹ ایمان قدیمی واقعہ بالمقابل غلا گودام کوھاٹ روڈ

نام و کنٹ جرم
احمد نواز ولد گل پور ساکن سرانے اتر علی خان مکانہ جاری نمبر 10 کسان اسم و کنٹ نام و کنٹ

کارروائی جو پیش کے متعلق کی گئی اگر اطلاعات درج کرنے میں توقف ہو بہ وقت بیان کرنا صاحب رائے DPP صاحب مقدمہ درج رجسٹر کیا جائے

فائدہ سہراگی کی تاریخ وقت
بہ سبیل عام

ابتدائی اطلاع نیچے درج کرو۔ عدوی خانہ نمبر 2 نے لیدر ات واجد علی خان ڈس صاحب پتلاور نے درخواست گزار کی تھی جس پر صاحب جو صرف نے مقدمہ بر مقدمہ ملد خان / امیر نواز بہ 5 کسان درج رجسٹر کیا کا حکم کیا تھا درخواست رائے پراسیکیوشن حاصل کی جا کر جناب DPP صاحب - مقدمہ نمبر 14 درج رجسٹر کرنے کا رائے دیا گیا تھا صاحب رائے DPP صاحب مقدمہ نمبر 14 درج 2 کی جا کر لٹرل پرچہ جات لیسٹن حوالہ علی سرد خان آئے کیا جائے پھر چڑھا رہی ہے

درخواست عدوی نزل سے جاسالی سائلین حسب ذیل عرض رساں سے یہ سائلین آئیے سائلین آئیے سائلین آئیے اور پھر این باگتانی شہری ہے اور حضرت خاندان سے تعلق رکھتا ہے یہ سائلین نے ایک عدد بلاٹ بر قبہ نمبر 18 اور 280 قرضہ مکانہ جاری بحال و صلح لیا در سال 2017ء میں از ان سہمی زاہد اسلم محمد اسم خان ساکن مکانہ جاری کوھاٹ روڈ لیا اور یہ خبر پرائے اور کل زمرہ سہمی زاہد اسلم کو لئی گئی ہے یہ سائلین میں سائلین کے قبضہ و تصرف میں ہے یہ کہ اب چند دنوں سے امیر نواز ولد گل حال بلاٹ مذکورہ جن سائلین کے قبضہ و تصرف میں ہے آئین اسلام (ملا سنگھ) بیکور بنروزہ پیر در خان نے دس سائلین اسم و کنٹ نام و کنٹ حاصل ہے آئین اسلام (ملا سنگھ) بیکور بنروزہ پیر در خان کے سائلین کے بلاٹ مذکورہ میں داخل ہوئے ہیں اور سائلین سے بلاٹ مذکورہ بندور بنروزہ پیر در کرنے کی دھمکیاں دیتے ہیں یہ کہ شخص مذکورہ بلاٹ سائلین سے بلاٹ مذکورہ سے تعمیر آبا کی ہیں اسلم کی نوٹ پر بنروزہ پیر در سہمی گاڑی میں ڈال کرے گیا اور جاتے ہوئے سائلین کے چار دیواری میں سے لیا گیا یہ کہ سہمی امیر نواز شہری اور کا نیایت سہمس خود سہرہ صاحب سہمی زور قبضہ - گدی اور قبضہ خور شخص ہے اور شریف کوٹوں کی جائیدادوں پر غیر قانونی طور پر قبضہ کرتے ہیں اور میں ان سے قدر رحم بطور قبضہ وصول کرتا ہے جس کی تصدیق کسی بھی زمرہ سے کی جاسکتی ہے کہ سائلین نے مذکورہ بالا حقائق ایس ایچ او خانہ مکانہ جاری آئین اسلام پی سہمی لیاور ایس پی آپریشن اور چیف ایس پی کوٹوں پتلاور کے ڈسٹریکٹ بار لایا ہے سہمی تاحال سائلین کی کوٹوں کو لئی ہے یہ کہ سائلین نے سہمی البیم کو برائے اندر ایف آئی آر درخواست کی ہے برخلاف سہمی نے غیر قانونی طور پر قبضہ سہمی البیم نمبر اتا 3 نے برخلاف سہمی البیم نمبر 4 کے خا کہی بھی قسم کی رپورٹ ایف آئی آر درج میں فرمال کی یہ کہ سہمی البیم نمبر اتا 3 نے اپنے قبضہ بندی اور قانونی ذمہ داری سے سہمی برخلاف کر رہے ہیں بدین وجہ درخواست ہذا کی ضرورت

20

21

لاحق بیوی لہذا استدعا ہے کہ مذکورہ درخواست حرا مسئول البیہم غراتا 3 دہلیت فرما
تاریخ کہ مسئول البیہم نمبر 30 کے خلاف جرم درج رجسٹر کر کے قانونی کارروائی عمل میں لایا
کے ادوات ہمارے فرمائی تاریخ المرقوم 19/11/21 دستخط انڈر ہیری طارق خان ولد فتح محمد
خان سائن وردان طالب عدالت نمبر 2 پشاور سینٹریل
خان

نقل برائے اہل
7/12/2022
MIAS: P.S. 571
13.01.2020

Copy of Agency (R.W)
Legal Branch
Capital City Police Peshawar
7/12/2022

10

ANNEXURE E

91

92

Annexure E

STATEMENT OF COMPLAINANT TARIQ KHAN S/O FATEH MUHAMMAD
R/O PAR HOTI, MARDAN PRESENTLY GULBERG NO.2, DURRANI STREET,
PESHAWAR CANTT ON OATH:

Stated on oath that a case vide FIR No. 97, dated 12/01/2020 u/s 17 (3) Haraba r/w 395/387/506/148/149/427 PPC at PS Bhana Mari, Peshawar wherein accused/petitioners Umar Daraz, Amir Nawaz, Umar Siddique, Naik Muhammad, Suleman, Saeed Khan and Umar Farooq were charged. Now I have patched up the matter with the accused/petitioners named above, have pardoned them in the name of Allah Almighty and I have got no objection if the pre-arrest bail of accused/petitioners Umar Siddique, Naik Muhammad, Suleman, Saeed Khan and Umar Farooq is confirmed whereas accused/petitioner Umar Daraz and Amir Nawaz are granted bail on the basis of compromise or they are acquitted at the time of trial. The compromise is genuine and without any undue influence or coercion. Compromise affidavit is EX:PA whereas copy of my CNICs is EX:PB.

RO & AC:-
06/02/2020

Tariq Khan

Tariq (Complainant)
CNIC No.16101-3895203-1

8

Alamgir Sham
ALAMGIR SHAM
AD&SI-VI, Peshawar

ATTESTED
9/2/2020
ke

Attested at Peshawar
District Court
Date: 09/02/2020

ATTESTED

30/2/2020

(Examiner)
District Court Peshawar

92

93

ANNEXURE F/I
Annex-F/I

**IN THE COURT OF ALAMGIR SHAH
ADDITIONAL SESSIONS JUDGE -VI, PESHAWAR**

Umar Daraz etc -Vs. State

BBA No. _____/BA of 2020

And

Umar Siddique -Vs. State

BBA No. 18/BBA of 2020

And

Naik Muhammad -Vs. State

BBA No. 20/BBA of 2020

ORDER
06/02/2020

Through instant order, I intend to dispose of the above referred three petitions, being the outcome of one and same FIR.

Counsel for accused/petitioner submitted an application for early hearing of connected BBA petition fixed for 12/02/2020 stating therein that compromise has been effected between the parties as such, the BBA petitions were requisitioned for today and entry to this effect was made in the daily diary and cause list of today.

Accused/petitioner Umar Siddique, Naik Muhammad, Sulaman, Saced Khan and Umar Farooq on ad-interim pre-arrest bail whereas accused Umar Daraz and Amir Nawaz through counsel present. Complainant in person present. APP for State Miss Fluma also present.

ATTESTED TO BE
TRUE COPY

Muhammad Usman Khan
Turtaji
Advocate Supreme Court
of Pakistan: No: 5045

ATTESTED

30 FEB 2022

(Examiner)
District Court Peshawar

23

Accused/petitioner Umar Daraz and Amir Nawaz Sons of Gulpur Khan seek their post arrest bail whereas accused/petitioners Umar Siddique, Naik Muhammad, Salman, Saeed Khan and Umar Farooq seek confirmation of their ad-interim pre arrest bail in case FIR No. 97, dated 13/01/2020 U/S 382/387/506/427/148/149 PPC of Police Station Bhana Mari, Peshawar.

At the very outset, parties stated at the bar that they have effected compromise. Complainant present before the Court submitted compromise affidavit EX:PA. placed in bail petition and submitted that he has patched up the matter with accused/petitioners and raised no objection on grant of bail to the accused/petitioners Umar Daraz and Amir Nawaz and confirmation of pre-arrest bail of accused/petitioners Umar Siddique, Naik Muhammad, Suleman, Saeed Khan and Umar Farooq. To this effect, his statement recorded, placed on file. Copy of CNIC of complainant was placed on file as EX:PB.

In light of the above, I am satisfied that a genuine compromise has been effected between the parties which is in their best interest. Though, the offence 382/387 PPC are not compoundable but keeping in view the compromise effected between

M. M. Khan

M. M. Khan
District Court Peshawar

CG

ATTESTED

3-0-2020
(Examiner)
District Court Peshawar

95 24

the parties and taking guidance from the Superior Courts judgments upon same issue wherein it has been held that compromise effected between the parties even in non compoundable offences may be given preference for harmony, peace and tranquility in the society, hence, compromise is accepted. Accused/petitioners Umar Daraz and Amir Nawaz are directed to be released on bail provided they furnishes bail bonds to the tune of Rs. 100,000/- with two local, reliable and resourceful sureties each in the like amount to the satisfaction of this Court whereas ad-interim pre-arrest bail already granted to the accused/petitioners Umar Siddique, Naik Muhammad, Salman, Saeed Khan and Umar Farooq is hereby confirmed on existing bail bond.

Requisitioned record be returned to the quarter concern and file of this Court be consigned to Record Room after its completion,

Announced
Dated: 06/02/2020

ATTESTED TO BE
TRUE COPY

Alamgir Shah
Additional Sessions Judge-VI,
Peshawar

Turkani
Advocate Supreme Court
of Pakistan. No: 5045

CERTIFIED TO BE TRUE COPY

(Ex. Officer)
Copying Agency District Court
Peshawar.

No.	57767
Dated of Application	30/1/22
Name of Applicant	Umar Daraz
Words Pages	1-6
Fee	500/-
Prepared	30/1/22
Delivered	30/1/22

25

ANNEXURE 9

IN THE COURT OF ALAMGIR SHAH
ADDITIONAL SESSIONS JUDGE - VI, PESHAWAR

Amir Nawaz etc -Vs. State

BBA No. _____/BA of 2020

And

Umar Farooq Etc -Vs. State

BBA No. 23/BBA of 2020

And

Naik Muhammad etc -Vs. State

BBA No. 32/BBA of 2020

ORDER
06/02/2020

Through instnat order, I intend to dispoe of the above referred three petitions, being the outcoem of one and same FIR.

Cousnel for accused/petitioner submitted an application for early hearing of connected BBA petition fixed for 12/02/2020 stating therein that compromise has been effected between the parteis; as such, the BBA petitions were requisitioned for today and entry to this effect was made in the daily diary and cause list of today.

Accused/petitioner Umar Farooq, Umar Siddique, Naik Muhammad, Suleman and Saeed Khan on ad-interim pre-arrest bail whereas accused Amir Nawaz and Umar Daraz through counsel

Amir Nawaz

[Signature]
[Stamp]

present. Complainant in person present. APP for State Miss Huma also present.

Accused/petitioner Amir Nawaz and Umar Daraz Sons of Gulpur Khan seek their post arrest bail whereas accused/petitioners Umar Farooq, Umar Siddique, Naik Muhammad, Suleman and Saeed Khan seek confirmation of their ad-interim pre arrest bail in case FIR No. 102, dated 13/01/2020 U/S 17 (3) Haraba r/w 387/506/148/149/427 PPC of Police Station Bhana Mari, Peshawar.

Amir Nawaz

At the very outset, parties stated at the bar that they have effected compromise. Complainant present before the Court submitted compromise affidavit EX:PA, placed in bail petition and submitted that he has patched up the matter with accused/petitioners and raised no objection on grant of bail to the accused/petitioners Amir Nawaz and Umar Daraz and confirmation of pre-arrest bail of accused/petitioners Umar Farooq, Umar Siddique, Naik Muhammad, Suleman and Saeed Khan. To this effect, his statement recorded, placed on file. Copy of CNIC of complainant was placed on file as EX:PB.

[Signature]
J. B. I.
J. B. I.

In light of the above, I am satisfied that a genuine compromise has been effected between the

parties which is in their best interest. Though, the offence U/S 17 (3) Haraba, 387 PPC are not compoundable but keeping in view the compromise effected between the parties and taking guidance from the Superior Courts judgments upon same issue wherein it has been held that compromise effected between the parties even in non compoundable offences may be given preference for harmony, peace and tranquility in the society, hence, compromise is accepted. Accused/petitioners Amir Nawaz and Umar Daraz are directed to be released on bail provided they furnishes bail bonds to the tune of Rs. 100,000/- with two local, reliable and resourceful sureties each in the like amount to the satisfaction of this Court whereas ad-interim pre-arrest bail already granted to the accused/petitioners Umar Farooq, Umar Siddique, Naik Muhammad, Saleman and Saeed Khan is hereby confirmed on existing bail bond.

Requisitioned record be returned to the quarter concern and file of this Court be consigned to Record Room after its completion.

IA/17/2020
 Dismissed

Announced
 Dated: 06/02/2020

No.	21291
Date of Application	5/4/23
Name of Applicant	Muhammad Amir Nawaz
Pages	205
Number of Copies	1
Preparation	5/4/23
Delivery	5/4/23

Alamgir Shah
 Alamgir Shah
 Additional Sessions Judge-VI,
 Peshawar

98

ANNEXURE-77

95

OFFICE OF THE SSP,
INVESTIGATION, PESHAWAR.
DY: No. 246-C
DT: 17-06-2022
Enclosures (19)

Dy: No. 1002 PSO-CCPC
DI: 17-06-2022
Encl:

بخدمت جناب چیف کیپٹل سٹی پولیس آفیسر پشاور

Annex-77

SSP (Inv)

Pls conduct an enquiry of including involvement of the accused in Criminal Cases, Outcome of the trials in those cases, as to how had he obtained the clearance Certificates from Police. The enquiry must be handled diligently.

درخواست براد قانونی / محکمہ کارروائی خلاف
عمر فاروق ولد عمر دراز عرف درازے ساکن درازی سرائے بھانہ ماڑی پشاور
جناب عالی: اس کے ذیل سے حاصل کیے گئے ہیں۔
1- یہ کہ ساکن ایک شریف، پراسن اور قانون پسند پاکستانی شہری ہے اور پیشہ وکالت ہے اور پتہ وکالت ہے۔

2- یہ کہ ساکن آپ صاحب اختیار کے نوٹس میں ایک نہایت اہم ناک اور سنگین نوعیت کے کی جانب مبذول کرنا چاہتا ہے جو کہ بالخصوص خیر بختونخوا پولیس کیلئے ایک نہایت اہم نوعیت کا ہے۔
16/6/22

3- یہ کہ پشاور کے شہری علاقے میں سال 1978 سے مسلسل ہجرانہ زندگی گزارنے والا شخص مسی عمر دراز عرف درازے ولد گل پور جو درجنوں مقدمات میں پولیس نے گرفتار کیا ہے اور بعد میں مذکورہ شخص نے عدالتوں سے رہائی حاصل کی۔

SP Anw HQE

Comply above mentioned directions and report

4- یہ کہ مذکورہ شخص تقریباً 45 سال سے مسلسل جرائم کی دنیا میں ایک بڑا اور درشت ناک نام رکھتا ہے جس سے پوری پشاور واقف ہے۔

TESTED TO BE TRUE

Muhammad Usman Khan
Barandi
Advocate Supreme Court
C. Pakistan. No. 6045

5- یہ کہ مسی عمر درازے کا پورا خاندان ایک بدنام زمانہ قمار باز گروپ میں اور مذکورہ شخص

94 29

BETTER/LEGIBLE COPY

BETTER COPY

حکومت جناب چیف کمیشن پولیس ایسٹریٹ صاحب ایسٹریٹ

درخواست نمبر ۱۱ کا قانونی کارولٹن بر خلاف عمر فاروق ولد

عمر دراز عرف دراز کے ساکن دراز کے سرٹھے بھانہ ماڑی، ایسٹریٹ

SSP (Inv)

Pls. Conduct an enquiry including involvement of accused in Criminal Cases, outcome of those the trial in those cases & as to how the clearance had he obtained from Police.

سائیل حسب زیر عرض ارسال ہے۔

جناب عالی!

- 1 یہ کہ سائیل ایک شریف پرائمن اور قانون لینڈ پاکستانی شہری ہے۔ اور پینشن و کالٹ سے وابستہ ہے۔
- 2 یہ کہ سائیل آپ صاحب اختیار کے نوٹس میں ایک نہایت اہم نازک اور سنگین نوعیت مشد کی جانب مبذول کرنا چاہتا ہوں۔ جو کہ بالخصوص خیبر پختونخوا پولیس کے ایک نہایت اہم نوعیت کا ہے۔
- 3 یہ کہ ایسٹریٹ کے شہری علاقے میں سال 1978ء سے مسلسل مجرمانہ زندگی گزارنے والا شخص مسی عمر دراز ولد گل لور جو درجنوں قدمات میں پولیس نے گرفتار کیا ہے۔ اور بعد میں عدالتوں میں 16-6-2022 سے عدالتوں سے رہائی حاصل کی ہے۔

- 4 یہ کہ مذکورہ شخص تقریباً 45 سال سے مسلسل جرائم کی دنیا میں ایک بڑا اور دہشت ناک نام رکھتا ہے۔ جس سے پوری ایسٹریٹ واقعہ ہے۔
- 5 یہ کہ مسی دراز کے ماہور خاندان ایک بدنام زمانہ قمار باز گروپ ہیں۔ اور مذکورہ شخص اور اس کا بڑا بیٹا مسی عمر فاروق ولد عمر دراز عرف دراز کے ساکن بھانہ ماڑی، ایسٹریٹ

SP Inv HQR
copy above mentioned direction and report.
SSP Inv
20/11/2022

اور اس کی بیوی بھی عمرانی ہوئی وہ عمر دراز عرف دراز سے سائن بھانڈا ماری پٹور
منٹ تھر کے سبب و بھن کر صراحتاً زنی اقبندہ فی اور بھتہ خوری کے علاوہ کئی دیگر قسم
کے خطرہ کی جرائم میں جن کو موٹ ہے جس کی تصدیق مٹی پو لیس یعنی تھانہ بھانڈا ماری
سے کی جا سکتی ہے۔

6- یہ کہ سب عمر دراز عرف دراز سے نے سینہ پٹی کیٹ میں کسی اراشی انفران سے لی
بھتہ کر کے اپنے ہونے سے کسی عمر دراز و وق ولد عمر دراز کو تھانہ استمان برائے اسٹنٹ
سب ایسی ASI سٹنٹ اور انٹرویو میں پٹس کر دیا ہے جس سے دیگر اہل لیووں
کی حتمی ہو چکی ہے اور شخص مذکورہ یعنی کسی عمر دراز عرف دراز سے
سائن بھانڈا ماری نے مٹی پو لیس سے ساز باز کر کے اور ان کو بھاری رشوت دیکر
پو لیس کی پٹس سر فینٹ بھجوا دیا ہے۔

7- یہ کہ پٹور شہر کے ایک بڑے سزا مند قار باز قبندہ مانا اور بھتہ خور نے دولت اور رشوت کی
زور پر اپنے بیٹے کو پو لیس میں اسٹنٹ سب ایسی کے عہدے پر بھرتی کی ہے
جو کہ پٹور کے شریف لیووں اور خیر بھتہ خور کے مثالی پو لیس کیلئے لو لکر رہے ہیں جس کا
ازالہ قرین انداز ضروری ہے۔ (مذکورہ اشخاص کے مجرمانہ زندگی کے بابت چند ایف
آئی آر زلف درخواست بنا ہے)۔

8- یہ کہ اس طرح کے جرائم پیشہ لیووں کی خیر بھتہ خور پو لیس میں بطور ASI بھرتی نہ خیر
پٹو خور کی مثالی پو لیس کیے بدنامی کا باعث ہے۔

TO BE
COPY

Signature
Esmaai Khan
District
State Supreme Court
G. P. S. ...

(31)

(30)

(29)

BETTER COPY

مختلف قسم کے سماج دشمن عناصر قمار بازی، قبضہ مافیا اور بھتہ خوری کے علاوہ کئی دیگر قسم کے خطرناک جرائم میں بھی ملوث ہے جسکی تصدیق مقامی پولیس یعنی تھانہ بھانہ ماٹھی سے کی جا سکتی ہے۔

یہ کہ مسی عمر دراز عرف دراز نے صوبائی بینک کمیشن میں کسی راشی افسران سے ملی بھگت کر کے اپنے بڑے بیٹے مسی عمر فاروق ولد عمر دراز کو محکمہ امتحان برائے اسٹنٹ سب انسپکٹر ASI ٹیسٹ امتحان اور انٹرویو میں پاس کروایا ہے۔ جس سے دیگر اہل لوگوں کی حق تلفی ہو چکی ہے۔ اور شخص مذکورہ یعنی مسی عمر فاروق ولد عمر دراز عرف دراز نے ساکن بھانہ ماٹھی نے مقامی پولیس سے ساز باز کر کے انکو بھاری رشوت دیکر پولیس کلیرنس لیس سرٹیفکیٹ بھی حاصل کی ہے۔

یہ کہ پٹشاور شہر کے ایک بدنام زمانہ قمار باز قبضہ مافیا اور بھتہ خور نے دولت اور رشوت کی زور پر اپنے بیٹے کو پولیس میں اسٹنٹ سب انسپکٹر ASI کے عہدے پر بھرتی کی ہے۔ جو کہ پٹشاور کے شریف لوگوں اور خیرینوں کو اس کے منالی پولیس کیڈے لمحہ فکر ہے۔ جسکا ازالہ قرین الفاظ ضروری ہے۔ (مذکورہ اشخاص کے مجرمانہ زندگی کے بابت چند FIR لف درخواست ہذا ہے۔

یہ کہ اس طرح کے جرائم پیشہ لوگوں کی خیریت کو منالی پولیس میں بطور ASI بھرتی ہونا خیریت کو منالی منالی پولیس کیڈے بدنامی کا باعث ہے۔

ATTESTED TO BE TRUE COPY

Imshamud Usman Khan
Tufan
Advocate Supreme Court
of Pakistan. No: 5745

(32)

(98)

(24)

یہ کہ کسی عرفاً ذوق و دماغ اور اس کے برعکس ذوق کے بابت ایک شریف اور ائمہ دار
یہ نہ کہ ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے
کہ اس کے ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے۔

1- یہ کہ ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے
کہ اس کے ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے
کہ اس کے ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے۔

اس کے ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے
کہ اس کے ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے
کہ اس کے ذوق و دماغ اور اس کے برعکس ذوق کے ذریعے تھیں اور ان کی بابت ضروری ہے۔
17/6/2020

مدرسہ اسلامیہ
طارق خان بھٹی ولد شیخ محمد خان
ساکن مرزاہاں حال گلبرگ نمبر 2 پشاور کینٹ
رابطہ نمبر 0300-5877743

(Handwritten signature)

- 1- انسپکشن جنرل سٹیٹ پولیس ایسوسی ایٹس خیبر پختونخوا پشاور
- 2- ڈائریکٹر ایجوکیشن ایسوسی ایٹس (I.B) خیبر پختونخوا پشاور
- 3- ڈائریکٹر ایجوکیشن سٹیٹ پولیس ایسوسی ایٹس خیبر پختونخوا پشاور

BETTER COPY

9 یہ کہ مسمی عمر فاروق ولد عمر دراز ساکن بھانہ ماری کے بابت ایک شریف، دیانتدار، ایماندار وغیرہا بزار سینئر پولیس آفیسر کے ذریعے تحقیق و انکوائری نہایت فرہوی ہے۔ تاکہ محکمہ پولیس میں اس طرح کے کالے بھڑوں کی بھرتی ممکن نہ ہو۔

10 یہ کہ مذکورہ شخص یعنی عمر فاروق ولد عمر دراز عرف دراز کی پولیس میں بھرتی ہونے سے اس کا تحقیقی باپ مسمی عمر دراز عرف دراز کی مجرمانہ زندگی کو زبرد قوت مل جائیگی۔ اور مستقبل میں شریف لوگوں کی زندگی کیلئے ایسے عناصر نہایت خطرناک ثابت ہو سکتے ہیں۔

لینڈ اسٹینڈ کیا جاتی ہے۔ کہ بمذہبوری درخواست لیا مسمی عمر فاروق ولد عمر دراز عرف دراز کے خلاف قانونی کارروائی کیساتھ محکمانہ انکوائری اور تحقیقات کرنے کا حکم صادر فرمایا جاوے۔ لٹریٹھ مقامی پولیس یعنی پولیس سٹیشن بھانہ ماری کے S.H.O متعلقہ کو بھی حکم صادر فرمایا جاوے۔ کہ مذکورہ شخص کے مجرمانہ ریکارڈ کو مد نظر رکھتے ہوئے پولیس کانسٹیبل سرٹیفکیٹ جاری نہ کرے۔

sd/- 17-6-2022

طارق خان ہوتی ولد فتح محمد خان
ساکن مردان حال گلبرگ 3 ایس آر کینٹ
دالہ لبر 0300-5877743

RECORDED PD 87
2022

Police Station

Post

کاپی رائے اللہ عیالی!

- 1) انسپکٹر جنرل پولیس خیبر پختونخوا ایس آر
- 2) انسپکٹر ایڈیٹل جنس بیورو (A, B) خیبر پختونخوا ایس آر
- 3) ڈپٹی انسپکٹر جنرل آف پولیس سیشن لبر خیبر پختونخوا ایس آر

34

ANNEXURE H/I



OFFICE OF THE
Sr. SUPERINTENDENT OF POLICE, INV. CCP, PESHAWAR.

No. 384 /PA, Dated Peshawar the 19 10.9 2022.

Annex H/I

To The Capital City Police Officer,
Peshawar.
Subject. APPLICATION FOR LEGAL PROCEEDINGS AGAINST UMAR FAROOQ S/O UMAR DARAZ @ DARAZAY R/O BHANA MARI PESHAWAR.

Please refer to your office Dy: No.1002/PSO-CCPO, dated 17.06.2022, on the subject noted above.

It is submitted that to probe into the matter, the requisite statement has been sought from concerned officials, which are as under:-

STATEMENT OF INCHARGE ESTABLISHMENT CLERK CCP PESHAWAR.

He stated that PASIs are selected through the Public Service Commission in KP Police and consequent upon this office verifies their academic record from concerned Board/University, while their character verification is being carried out by FMC Branch CCP Peshawar. When all the requisite formalities are completed, thereafter his service book is sent to Pay Branch for pay purpose. Moreover, this office has not received any verification of the newly appointed PASIs from FMC Branch.

STATEMENT OF IHC MUHAMMAD HASSAN I/C FAUJI MISAL CLERK CCP PESHAWAR.

He stated that he is working as I/C FMC Branch, PRs Form 12-18 were handed over to the newly appointed officials for verification from their local Police station by themselves (by hand) and for the same purpose another copy of the same form was confidentially sent to the concerned Police station. Subsequently, after verification of the requisite forms, the same is placed on Fauji Misal according to Police Rules 12-39. As far as the enlistment of PASI Umar Farooq is concerned, in this regard enlistment order No.9830-35/EC-I, dated 24.05.2022, received from EC-I CCP Peshawar comprising of 25 newly enlisted officials. Consequent upon, each official got his form for verification and after verification deposited the same in FMC Branch. Similarly, PASI Umar Farooq s/o Umar Daraz r/o Bhana Mari has also deposited his verification form to this office, while on 28.07.2022, his confidential verification report has been received from Police station Bhana Mari, which was sent to EC-II for further verification.

E.O-QUESTIONS:

Q-1) E.O: Under which law/rules do you hand over the verification form to the newly appointed official?

Ans) It is a routine practice, one photocopy of verification form is given by hand and the other is sent confidentially to the concerned Police station.

Muhammad Usman Khan
Tufanji
Advocate Supreme Court
Pakistan. No: 5045

Scanned with CamScanner

35

32

**OFFICE OF THE
Sr. SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.**

Office Ph:No. 091-9210642
No. _____ /PA, Dated Peshawar the _____ /2022.

Q-2) **E.O:** How do you maintain the record by doing the said practice?

Ans) One photocopy is sent concerned Police station by Dak book and the other is given to official by hand without taking receiving signature from the concerned official.

STATEMENT OF ASI SHAHID KHAN MOHARRAR PS BHANA MARI.

He stated that he is posted as Moharrar Operation PS Bhana Mari Peshawar. He received verification form of Umar Farooq s/o Umar Daraz r/o Ramdas Peshawar through "Dak". Consequent upon, Register No.4, Register No.9 were thoroughly checked, while he was found non-convicted. He further added that the accused who has been declared proclaimed offender, his name is entered in Register No.04, and Register No.9, while the name of convicted accused is entered in Register 9 (5). Moreover, if the name of any accused is not found in the above Registers, he/she is considered to be non-convicted from the Court of law and clear.

E.O-QUESTIONS:

Q-1) **E.O:** Beside the Police station record, is there any staff of Police station responsible to get report of the person in question regarding his previous Character & General reputation in the locality?

Ans) Yes.

Q-2) **E.O:** If it is yes then why you did not incorporate his general reputation in your report?

Ans) It must be, while it hasn't been done.

Q-3) **E.O:** Two Forms inquestion have been duly signed/verified by your Police station staff, but it came under your responsibility, do you accept it?

Ans) I accept the responsibility and the report is correct according to the Registers.

STATEMENT OF IHC ILHAM-UD-DIN AMHC PS BHANA MARI.

He is posted as Additional Moharrar PS Bhana Mari. He received the verification form of Umar Farooq s/o Umar Daraz r/o Ramdas Peshawar through "DAK". Consequent upon, Register No.4, Register No.9, and Register No.9 (5) were thoroughly checked where Umar Farooq was found non-convicted.

E.O-QUESTIONS:


Q-1) **E.O:** General reputation of the official is not a part of Character verification?

Ans) Yes, it is.

Q-2) **E.O:** If yes then; why you did not incorporate it in your report?

Ans) My job is to check it in Registers only.

ATTENDED TO BY


Muhammad Usman Khan
Tribunal
Advocate Supreme Court
of Pakistan, No: 5045

36

43

**OFFICE OF THE
Sr. SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.**

No. _____ /PA, Dated Peshawar the _____ /2022.

STATEMENT OF ASI HAZRAT ALL OF PS BHANA MARI.

He is posted for general duty at PS Bhana Mari. He was handed over the verification form of Umar Farooq s/o Umar Daraz r/o Ramdas for local verification. Consequent upon, he only verified the permanent residency of Umar Farooq and incorporated his report in the verification form.

E.O-QUESTIONS:

Q-1) **E.O:** Is General reputation not a part of character verification?

Ans) I have verified the residency of Umar Farooq, while rest of report is the responsibility of Moharrar PS Bhana Mari.

Q-2) **E.O:** Did you incorporate the report regarding family & General reputation in Character Verification Form?

Ans) Father of Umar Farooq has a criminal history, while I did not mention it in the character verification form.

Q-3) **E.O:** You verify the character verification form with mala fide intention?

Ans) I have verified it to the best of my knowledge.

FINDINGS:

All the requisite statements were recorded, the outcome is as under:-

There are two photocopies of the Character Roll Form 12-18, issued from FMC Branch CCP Peshawar, one photocopy of the said Form is given by hand to the newly enrolled officials, while the other is sent confidentially to the concerned Police station for verification.

1. The same is verified by the concerned Police station after local verification of the official concerned and sent to FMC Branch for further proceedings.

3. The one photocopy of verification Form received to Police station by DAK, which has been verified by beat officer of PS Bhana Mari who only incorporated the report regarding residency of Umar Farooq s/o Umar Daraz in the Character Verification Form and the same was further verified by the Addl: Moharrar from Register No.4, 9 & 9 (5), wherein he was found non-convicted. After that the Form in question was verified/attested by Addl: SHO PS Bhana Mari and sent to FMC Branch for further proceedings.

CONCLUSION:

Keeping in view the above, Police Rules 12-18 (1) defines:-
"The Character and suitability for enrollment of every recruit shall be ascertained by the reference to the lambardar of the village or the ward

Tunde
Advocate
of Peshawar

37

34

35

**OFFICE OF THE
Sr. SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.**
Office Ph: No. 091-9210642.
/PA, Dated Peshawar the _____ / _____ /2022.

member of the town of which the recruit is the resident. A search slip shall also be sent to the finger print bureau in order to establish his freedom or otherwise from conviction. Such lambardar or ward member shall, if the recruit is a good Character furnish a certificate to the effect, which shall be verified and attested by the Sub-Inspector incharge of the local Police station. The Sub-Inspector shall also complete the information required by 12-18 (1)".

It is worth mentioning here that to my understanding verification on form 12-18, is mandatory for newly appointed official/recruit to join Government service. The form include a complete verification process which include *General reputation, family background, any affiliation (Political, religious etc), family members, job & earning sources, siblings details* and so on. However, it was to utter dismay that local Police is not doing their job as per department's SOP, which should be carried out in due letter & spirit. It is suggested that a detailed check list may be introduced mentioning all the aspects preferably the Assets declaration/detail duly signed by SHO, SDPO, SP division be obtained (accrued). The non-conviction merely should not be the criteria and which is surely not the only requisite of Form PR 12-18.

So far verification of PASI Umar Farooq is concerned, it is being done as per practice invogue and on the pattern verification of his other colleagues carried out on the basis of checking Police record for conviction and their residency, which is surely negative in his case as his father (Umar Daraz) use to run gambling dens not the incumbent himself. The verification is still in process and his colleagues papers have further been sent to Special Branch except of PASI Umar Farooq as he was under inquiry. However, verification carried out so far is not satisfactory, hence, needs further in depth probe/inquiry.

Report is submitted, please.



(SHAHZADA KAUKAB FAROOQ)
Senior Superintendent of Police,
Investigation, CCP, Peshawar



38

ANNEXURE 9



DIRECTORATE OF TRAINING
CENTRAL POLICE OFFICE
KHYBER PAKHTUNKHWA, PESHAWAR

No. 10764/Trg dated 28.12.2022. Phone No. 091-9210941. Fax No. 9211268

To The Commandant,
Police Training College,
Hangu.

Annex-9

Subject: 01-YEAR BASIC TRAINING FOR PASI

Memo:

In continuation to this office letter No. 10628/Trg dated 26.09.2022.

As per recommendation of CCPO Peshawar & concern RPOs, the following untrained PASIs of Khyber Pakhtunkhwa Police are hereby nominated for the subject course commencing w.e.f 05.10.2022 at PTC, Hangu. All the nominees are directed to report alongwith COVID-19 vaccination certificate, original CNIC, Complete Uniform Kit & medical fitness certificate before 1600 hrs on the above mentioned date positively.

S/No.	Name & No.	DOB	DOE	Distt.	Mobile
D.I. Khan Region					
1.	PASI Ehtisham shergji 11/D	18.09.1995	01.07.2022	DI Khan	03339994849
2.	PASI Khalid Mehmood 12/D	12.03.1999	01.07.2022	DI Khan	03051267095
3.	PASI Muhammad Aqib 14/D	01.03.1998	01.07.2022	DI Khan	03169886259
4.	PASI Muzammil Warshan Zafra 23/D	21.01.1995	01.07.2022	DI Khan	03068564797
5.	PASI Muhammad Shoaib 25/P	05.02.1997	01.07.2022	DI Khan	03462904800
6.	PASI Muhammad Zeeshan 28/P	01.04.1995	01.07.2022	DI Khan	03429378426
7.	PASI Sabi Ullah Khan 29/D	29.07.1997	01.07.2022	DI Khan	03485648724
8.	PASI Sami Ul Haq 30/D	12.12.1997	01.07.2022	DI Khan	03402955645
9.	PASI Shafaqat Ali 31/D	30.12.1996	01.07.2022	DI Khan	03485115353
10.	PASI Shahid Ali Khan 33/D	19.10.1999	01.07.2022	DI Khan	03095116954
11.	PASI Shahrukh Ahmad 34/D	08.02.1995	01.07.2022	DI Khan	03339953339
12.	PASI M. Danial Mazhar 37/D	25.02.1999	01.07.2022	DI Khan	03346844544
13.	PASI Adil Mahsood 02/D	31.03.1995	01.07.2022	DI Khan	03105982557
14.	PASI Saleem Abbas Shah 126/D	12.02.1996	13.01.2016	DI Khan	03459248296
15.	PASI Muhammad Ishfaq 17/D	13.04.1996	01.07.2022	Tank	03025166919
16.	PASI Muhammad Shoaib 24/D	01.04.1995	01.07.2022	Tank	03014709963
17.	PASI Umar Jan 38/D	05.01.1996	01.07.2022	Tank	03429972290
Bannu Region					
18.	PASI Fawad Saif Ullah 220/B	05.05.1993	13.05.2022	L/Marwat	03109700177
19.	PASI Fida Ullah 221/B	07.07.1994	13.05.2022	L/Marwat	03429341219
20.	PASI Fida Ullah 222/B	02.09.1998	13.05.2022	L/Marwat	03434642760
21.	PASI Muhammad Rizwan Ullah 223/B	13.06.1993	13.05.2022	L/Marwat	03139420795
22.	PASI Sahib Zada Munib Ullah 226/B	22.09.1996	13.05.2022	L/Marwat	03349151907
23.	PASI Noor Ullah Khan 224/B	03.05.1993	13.05.2022	Bannu	03349696148
24.	PASI Rafiq Zaman 225/B -	02.03.1997	13.05.2022	Bannu	03346599494
25.	PASI Zia Ullah 230/B	18.02.1996	13.05.2022	Bannu	03033187431
CCP Peshawar					
26.	PASI Haider Ghani 480/P	20.06.1994	24.05.2022	Peshawar	03319020069
27.	PASI Ijaz Ali 481/P	08.03.1995	24.05.2022	Peshawar	03349172168
28.	PASI Ijaz Hussain 482/P	20.08.1995	24.05.2022	Peshawar	03180099494
29.	PASI Jamal Shah 483/P	18.08.1994	24.05.2022	Peshawar	03159150377
30.	PASI Jehngir Khan 484/P	01.05.1995	24.05.2022	Peshawar	03219716746
31.	PASI Muhammad Imran 493/P	30.04.1998	24.05.2022	Peshawar	03139483086
32.	PASI M. Zahid Khalil 495/P	15.02.1997	24.05.2022	Peshawar	03119180951
33.	PASI M. Zubair Khalil 496/P	11.02.1996	24.05.2022	Peshawar	03349127257
34.	PASI Shehzad Khan 498/P	27.02.1995	24.05.2022	Peshawar	03139404344
35.	PASI Tahir Junaid Khan 499/P	01.01.1995	24.05.2022	Peshawar	03366335545
36.	PASI Usman Ghani 502/P	30.04.1995	24.05.2022	Peshawar	03130903640

TRUE COPY

10
MW

(39)

(36)

(37)

37.	PASI Waheed Ullah 503/P	23.06.1994	24.05.2022	Peshawar	03139595462
38.	PASI Yasir Afzal 505/P	05.03.1996	24.05.2022	Peshawar	
39.	PASI Yasir Khan 506/P	05.03.1996	24.05.2022	Peshawar	03159109824
40.	PASI Zulqarnain 508/P	10.10.1996	24.05.2022	Peshawar	03159576405

Issued with the approval of the Competent Authority.

SP/Training

For Deputy Inspector General of Police
Training, Khyber Pakhtunkhwa

SP TR, Peshawar
Directorate of Training
P.O. Peshawar

Endst: No. & date even:

Copy of above is forwarded for information & further necessary action to the:-

1. Capital City Police Officer, Peshawar.
2. DIG HQs Khyber Pakhtunkhwa.
3. Concern Regional Police Officers, Khyber Pakhtunkhwa.
4. Concern District Police Officers.
5. PSO to W/Inspector General of Police, Khyber Pakhtunkhwa.

RECEIVED TO BE
TRUE COPY

40

38

BETTER/LEGIBLE COPY

BETTER COPY

DIRECTORATE OF TRAINING
CENTRAL POLICE OFFICE
KHYBER PAKHTUNKHWA PESHAWAR

No. 10764/Trg: dated 28-09-2022 Phone No. 091-9210941 Fax No. 9211268

To: The Commandant,
Police Training College,
Hangu.

Subject: 01 YEAR BASIC TRAINING FOR PASIs

Memo:

In continuation to this office letter No. 10628/Trg: dated 26-09-2022. As per recommendation of CCPO Peshawar and concerned RPOs, the following untrained PASIs of Khyber Pakhtunkhwa police are hereby nominated for the subject course commencing w.e.f 05-10-2022 at PTC Hangu. All nominees are hereby directed to report along with COVID-19 Vaccination Certificate, Original CNIC, Complete Uniform & Medical fitness Certificate before 1600 hours on the above mentioned date positively.

CCP PESHAWAR

S.No.	Name & No.	DOB	DOE	Distt:	Mobile
26	PASI Haider Ghani 480/P	20-06-1994	24-05-2022	Peshawar	0331-9020069
27	PASI Ijaz Ali 481/P	08-03-1995	24-05-2022	Peshawar	0334-9172168
28	PASI Ijaz Hussain 482/P	20-08-1995	24-05-2022	Peshawar	0318-0099494
29	PASI Jamal Shah 483/P	18-08-1994	24-05-2022	Peshawar	0315-9150377
30	PASI Jehangir Khan 484/P	01-05-1995	24-05-2022	Peshawar	0321-9716746
31	PASI M. Imran 493/P	30-04-1998	24-05-2022	Peshawar	0313-9483086
32	PASI M. Zahid Khalil 495/P	15-02-1997	24-05-2022	Peshawar	0311-9180951
33	PASI M. Zubair Khalil 496/P	11-02-1996	24-05-2022	Peshawar	0334-9127257
34	PASI Shehzad Khan 498/P	27-02-1995	24-05-2022	Peshawar	0313-9404344
35	PASI Tahir Junaid 499/P	01-01-1995	24-05-2022	Peshawar	0336-6335545
36	PASI Usman Ghani 502/P	30-04-1995	24-05-2022	Peshawar	0313-0903640
37	PASI Waheed Ullah 503/P	23-06-1994	24-05-2022	Peshawar	0313-9595462
38	PASI Yasir Afzal 505/P	05-03-1996	24-05-2022	Peshawar	
39	PASI Yasir Khan 506/P	05-03-1996	24-05-2022	Peshawar	0315-9109824
40	PASI Zulqirnan 508/P	10-10-1996	24-05-2022	Peshawar	0315-9576405

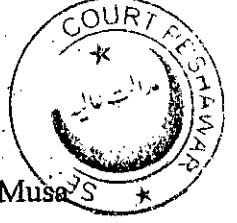
Issued with the approval of the competent authority.

ATTESTED TO BE
TRUE COPY

Muhammad Usman Khan
Attorney Supreme Court

Sd/-
SP/Training
For Deputy Inspector General of Police
Training Khyber Pakhtunkhwa
Peshawar.

In Ref: to WP No. _____-P/2022.



PASI Umar Farooq, S/O Umar Daraz R/O House No. 4881, Mohallah Musa Khan, Kohat Road, Bana Mari, Peshawar, working as Probationer Assistant Sub-Inspector Police and presently posted at Police line Peshawar.

.....**PETITIONER.**

VERSUS

- 1) The Provincial Police Officer, Khyber Pakhtunkhwa, Central Police Office, Peshawar.
- 2) The Capital City Police Officer, Peshawar.
- 3) Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar.

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN 1973 AS AMENDED UP-TO DATE.**

May it please this Honourable Court

The petitioner very earnestly seeks redressal of his grievances through the instant Writ Petition as under:-

Facts leading to this Writ Petition

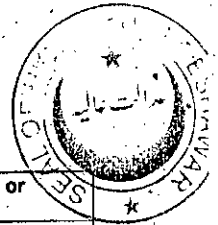
- 1) That the petitioner is a bonafide citizen of the Islamic Republic of Pakistan, domiciled in Khyber Pakhtunkhwa province, resident of village Bhana Mari, Peshawar, belongs to a respectable/law-abiding family of the locality, presently working and posted as Probationer Assistant Sub-Inspector Police (PASI) Police line Peshawar and having been aggrieved person within the ambit of Article 199 of the Constitution of the Islamic Republic of Pakistan 1973 and has every fundamental rights enjoined by the Constitution of the Country to be enforced in his favor.
- 2) That in response to an advertisement published in the daily News-Papers, the petitioner being well equipped with the pre-requisite qualification, formulated by the Provincial Public Service Commission, applied for the post of Probationer Assistant Sub-Inspector Police (PASI) and was succeeded to get the desired Post/Recommendation accordingly.

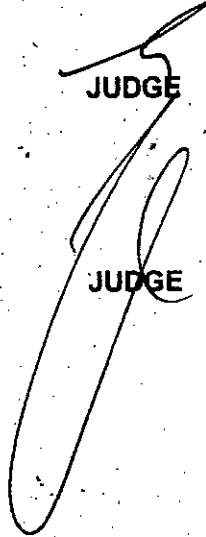
ATTESTED
EXAMINER
Peshawar High Court.

(42)

42

**PESHAWAR HIGH COURT PESHAWAR
ORDER SHEET**



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
13.12.2022	<p style="text-align: center;">1 2</p> <p><u>WP No. 4926-P/2022.</u></p> <p>Present: Mr. Muhammad Usman Khan Turlandi, Advocate, for the petitioner.</p> <p style="text-align: center;">*****</p> <p>Notice be issued to respondents to file their para-wise comments so as to reach this Court within a fortnight positively. Adjourned to a date in office.</p> <p><u>Interim Relief.</u></p> <p style="text-align: center;">Notice to the other side for 22.12.2022.</p> <p style="text-align: right;">JUDGE  JUDGE</p> <p style="text-align: right;">CERTIFIED TO BE Examiner Peshawar High Court Peshawar Authorized Under Article 17 of The Qanun-e-Shahadat Order 1984 10 APR 2023</p>



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Telephone No.091-9210641 Fnx No. 091-9212597

ORDER.

On the recommendation of Khyber Pakhtunkhwa Public Service Commission Peshawar vide letter No. PSC-ASI-EXAM-04-2018/025195 dated 18-04-2022 duly approved by the Inspector General of Police Khyber Pakhtunkhwa Peshawar vide letter No. 900-07/E-III dated 13-05-2022, Mr. Umar Farooq was appointed as PASI vide this office notification No. 9830-35/EC-I, dated 24.05.2022, subject to Medical Fitness, verification of Antecedent and verification of documents/testimonials from the concerned Board/University under the relevant rules and prescribed manner.

Being involved in criminal cases i.e. Case FIR No. 97, dated 12.01.2020 u/s 382/387/506/427/148/149-PPC PS Bhana Mar and Case FIR No. 102, dated 21.11.2019 u/s 1(3) Haraba/506/387/427/148/149-PPC PS Bhana Mar, Mr. Umar Farooq is hereby removed from service with immediate effect.

Sd/-

(MUHAMMAD IJAZ KHAN) P.S.P
CAPITAL CITY POLICE OFFICER
PESHAWAR.

No 23520-27/EC-I, date Peshawar 22/12/2022.

Copy of above is sent to for information & necessary action, please.

1. The Deputy Inspector General of Police (Qrs) Khyber Pakhtunkhwa Peshawar.
2. SSP/Operations, CCP, Peshawar.
3. SP/HQrs; CCP, Peshawar.
4. AIG/Legal CPO Peshawar
5. DSP/Legal, CCP, Peshawar.
6. EC-II, P.O & AS.

SSP/COORDINATION
FOR CAPITAL CITY POLICE, OFFICER
PESHAWAR.

BEFORE THE WORTHY PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA PESHAWAR.

Departmental appeal against the impugned order bearing No. 23520-27/EC-1 Dated Peshawar the 22-12-2022 passed by the kind Capital City Police Officer whereby the appellant has been removed from service with immediate effect.

PRAYERS IN APPEAL: on acceptance of this appeal the impugned order of Removal from Service may be set-aside and the appellant being totally innocent and has never been convicted in any Criminal Case, may be reinstated in service with all back benefits and allied allowances in order to meet the ends of justice.

Respected Sir,

- 1) That the Appellant is a bonafide citizen of the Islamic Republic of Pakistan, domiciled in the province of Khyber Pakhtunkhwa, resident of village Bhana Mari, Peshawar and belongs to a respectable/law-abiding family of the locality.
- 2) That in response to an advertisement published in the daily News-Papers, the Appellant being well equipped with the pre-requisite qualification, formulated by the Provincial Public Service Commission, applied for the post of Probationer Assistant Sub-Inspector Police (PASI) and was succeeded as such.
- 3) That in pursuance to the recommendations ibid, recruitment order against the post of PASI was passed wherein the name of the Appellant was figured at Sr. No. 19 and was also allotted Belt # 500.
- 4) That in furtherance to the appointment order and under the relevant Rules, the Appellant after getting his Clearance from the local Police, Medical Fitness, did reported his arrival vide Mad No. 23 dated 30-05-2022 of the daily Diary maintained by the Police-Line Peshawar and since then, was punctually & regularly performing his respective duty with great zeal, zest and enthusiasm. (Copy of the 1st appointment order as PASI, Clearance by the local Police, Medical Fitness Certificate, Arrival and daily Diary Report is annexure "A", "B" & "C" respectively).
- 5) That an ill-natured, ill-wisher and Chronic litigant was succeeded to book down all the male family members of the Appellant in a fabricated, well-engineered, concocted and frivolous Criminal cases vide FIR No. 97 dated 12-01-2020 and FIR No.102 dated 13-01-2020 of PS Bhana-Mari in order to grab money, residential plot and stigmatize the character role and deprive the petitioner of his newly esteemed job. (Copy of the FIR

No. 97 dated 12-01-2020 and FIR No.102 dated 13-01-2020 of PS Bhana-Mari is annexure "D" & "D/1" respectively).

- 6) That the Appellant in order to secure his newly esteemed job and to save his skin from unnecessary, uncalled and well-engineered litigation, entered into Compromise with the said ill-natured, ill-wisher and Chronic litigant followed by handing-over him the said plot and thus succeeded to get his BBA confirmed. (Copy of the Court Statement of the Complainant regarding confirmation of BBA and order thereon is annexure "E" & "F" respectively).
- 7) That after effecting compromise with the Appellant, even then, the complainant, did not left any stone unturned in stigmatizing the Character role and to deprive the Appellant of his Constitutional right of legal profession, did not keep his skin-free and submitted a Complaint to the respondent No. 2 just to deprive the Appellant of his Clearance Certificate, mandated for the newly Job of PASI whereas an enquiry was lunched. (Copy of the Complaint and enquiry proceedings is annexure "G" & "H" respectively).
- 8) That in the meanwhile, the newly recruited / untrained PASIs were nominated for 01 year Basic Recruit Training vide order dated 22-09-2022 but astonishingly the Appellant was left on the pretext of pending his so-called criminal cases ibid and hence, Writ Petitions bearing No. 4926-P/2022 was preferred which is still sub-judice before the August Peshawar High Court. (Copy of the impugned official letter dated 22-09-2022, excluding the Appellant from his Basic Recruit Training is annexure "I").
- 9) That the Writ Petition was fixed and left-over due to rush of work dated 22-12-2022 while in the meanwhile, the Appellant was surprised and shocked to get the impugned order bearing No. 23520-27/EC-1 Dated Peshawar the 22-12-2022 passed by the kind Capital City Police Officer whereby the appellant has been removed from service with immediate effect and hence this departmental Appeal is preferred for the redressal of his grievances as prayed for, inter-alia on the following grounds. (Copy of impugned order is annexure "J")

G R O U N D S:

- a) That That the impugned order bearing No. 23520-27/EC-1 Dated Peshawar the 22-12-2022 passed by the kind Capital City Police Officer is illegal, unlawful, without lawful authority, without jurisdiction, un-Islamic and against the norms of natural justice, hence liable to be set-aside.
- b) That 12-18 of Police Rules 1934 provides that "The Character and suitability for recruitment of every recruit shall be ascertained by the reference to the Lamberdar of the village or the Ward member of the Town of which the recruit is the resident. A search slip shall also be

otherwise from conviction. Such Lamberdar or the Ward member shall, if the recruit is a good Character furnish a certificate to the effect, which shall be verified and attested by the sub-Inspector In-charge of the local Police Station. The Sub-Inspector shall also complete the information required by 12-18 (1)".

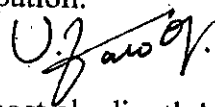
- c) **That** a bird eye view at 12-18 Police Rules 1934 would reveal about "Conviction" of a recruit and no mentioning about the pending of any reference or any criminal case against him and the Appellant should never have been denied his legal profession as PASI who has never been convicted in any criminal case till date and who has been given clear Character role verification by the concerned Police Station and as such was legally entitled to be sent for basic Recruit Course/ Training and retain him in his respective services in order to save his fundamental rights, guaranteed by the Constitution to be treated in accordance with law.
- d) **That** the Appellant being fresh recruit as PASI, had to participate in the basic Recruit Course/Training but the competent authority has dropped him followed by removal from services on flimsy ground of pending a criminal case against the Appellant and as such, pending a criminal case could not be a ground for denying the right of basic Recruit Course/Training to a fresh recruited PASI and subsequently his removal from service which highly deplorable and condemnable.
- e) **That** it is the settled law that a person is presumed innocent until found guilty by the competent court of law on the conclusion of his trial and convicted as such.
- f) **That** the Appellant being duly fresh recruited PASI has wrongly been prevented from his basic Recruit Course/Training to get his seniority/promotion and discharge his higher responsibility as a result of which he was deprived of his legitimate right of seniority/ promotion, more so, subsequently removed from service in such scenario.
- g) **That** it is clear discrimination which is strictly forbidden under Article 25 and 27 of the Constitution and is a fundamental right of every citizen.
- h) **That** the Appellant being duly recruited as PASI in pursuance to the recommendations made by the Provincial Public Service Commission who has been discriminated and thus misprized and neglected by not giving him his due right of basic Recruit Course/Training and subsequently removal from his services, as the Appellant was entitled to be given the same status and accorded with the same treatment as was accorded to his other colleagues/ appointees.

- i) **That** the act of neglecting and refusing the right of the Appellant to accommodate him against the post of PASI duly recruited as such and subsequently his removal from service would also against the Devine ordain of Allah Almighty as under the principles of natural justice and fundamental human rights of the Appellant, the respondents has usurped the right of a human being and have thus bypassed the divine rule to give everyone his due right.
- j) **That** the impugned action and in inaction of the respondents if seen with serious note, the same are also in clear disregard of Article 9 and 4 of the Constitution of the Islamic republic of Pakistan 1973 as the same is meant to deprive the Appellant from his right to life as the life is mainly dependent on bread and butter which is earned by a person through rendering services.
- k) **That** the Appellant was legally entitle to be provide with the equal protection of law and must not to discrimináte him in service as it was his inviolable and jealously guarded right under the Constitution of the Islamic republic of Pakistan 1973 to be accommodated as such.
- l) **That** the impugned is also violated to Articles 03, 04, 08, 09, 25 and 27 of the Constitution of the Islamic republic of Pakistan 1973.
- m) **That** Article 4 of the Constitution of Pakistan and Islamic principles of equity and equal treatment with citizen are downtrodden deliberately for ulterior motive, which needs the interference of this august court.
- n) **That** the Appellant has been penalized for no fault on his part and his contention has not been given due weight and there is no evidence whatsoever to substantiate the guilt of the Appellant if any.
- o) **That** prior to the impugned order no chance of personiel hearing has ever been bestowed upon the Appellant and it is the demand of natural justice that no should be condemned unheard.

Note: The appellant will be highly grateful if a chance of personnel hearing is bestowed.

It is, therefore, humbly prayed that on acceptance of this petition, the impugned order bearing No. 23520-27/EC-1 Dated Peshawar the 22-12-2022 passed by the kind Capital City Police Officer may kindly be set-aside and the appellant being totally innocent, may be reinstated in service with all back benefits and allied allowances in order to meet the ends of justice please.

Thanking you Sir, in anticipation.

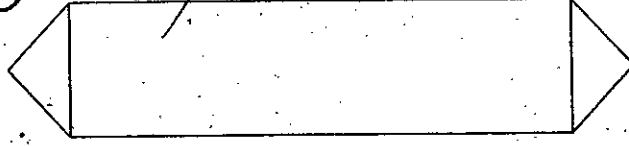


Yours most obediently!
(Umar Farooq Ex-PASI Belt # 500.)
Appellant

Dated: 24/12/2022.

بعدالت خیبر پختونخوا انسروس ٹریبونل لبرس اور

۶۸



۲۰۲۳ پنجاب ایپل
PPD خیبر پختونخوا وغیرہ
Respondents

بنام عمر فاروق
Ex-PASI (Police)
ایپلینٹ

مورخہ
مقدمہ
دعویٰ
جزم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام KP-ST کیلئے محمد عثمان خان ترلانندی ایڈووکیٹ سپریم کورٹ آف پاکستان
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند رہے۔

ATTESTED
&
ACCEPTED

۲۰۲۳

ماہ اپریل

الرقوم رسات

محمد عثمان خان ترلانندی

ایڈووکیٹ سپریم کورٹ آف پاکستان
No: 5045

NIL NO. 17301-1723606-3

C No. 10-7472

mail: Usmantrulandi@gmail.com

عدنان سٹیشنری مارٹ
پوک مشنری چارٹریڈ ہون: 2220193
Mob: 0345-9223239

DAWOOD KHAN
Advocate
BC NO 20-2212 PESHAWAR
Mob. 0300-5895841

مقام KP-ST

Umar Farooq Ex-PASI
CASE No. 17201-374233-5