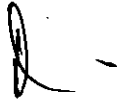


02.03.2023

Nemo for the appellant. Mr. Umair Azam Khan, Additional Advocate General for the respondents present and stated at the bar that connected Service Appeal bearing No. 15/2019 is fixed before D.B-I for arguments. In this view of the matter, the appeal in hand is sent to Worthy Chairman for further appropriate order. Learned counsel for the parties shall appear before Worthy Chairman today.



(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

2nd Mar, 2023

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. To come up for arguments on 18/5 /2023 before DB. PP given to the parties.

SCANNED
KPST
Peshawar



(Rozina Rehman)
Member (Judicial)



(Kalim Arshad Khan)
Chairman

26.08.2022

Clerk of learned counsel for the appellant present.
Mr. Naseer Ud Din Shah, Assistant Advocate General for
respondents present.

Learned Member (Judicial) Mrs. Rozina Rehman is
on leave, therefore, arguments could not be heard.
Adjourned. To come up for arguments on 24.10.2022
before the D.B.




(Salah-Ud-Din)
Member(J)

24th Oct., 2022 . Lawyers are on strike today.

To come up for arguments on 14.12.2022 before the
D.B. Office is directed to notify the next date on the
notice board as well as the website of the Tribunal.



(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman

14th Dec. 2022

Due to strike of the Bar and Mrs. Rozina Rehman,
learned Member (J) being on leave, this matter is adjourned
to 02.03.2023 before the D.B. Office is directed to notify
the next date on the notice board as well as the website of
the Tribunal.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member(E)

11.08.2021

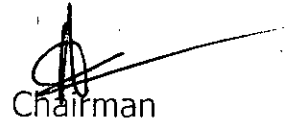
Junior to counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel is busy before Hon'ble Peshawar High Court; granted. To come up for arguments on 27.12.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

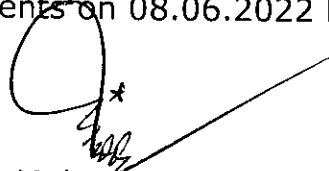
Due to winter vacation the case is adjourned to come up for the same on 14-4-2022



14.04.2022

Nemo for the appellant. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 08.06.2022 before the D.B.

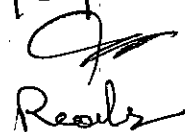


(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

8.6.2022 Paper D.B is an tour, therefore the case is adjourned to 26/8/22 is same



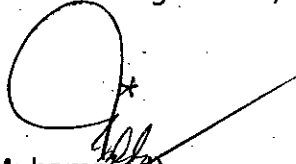
Reader

11.11.2020

Appellant present through representative.

Kabir Ullah Khattak learned Additional Advocate General
alongwith Muhammad Raziq H.C for respondents present.

Lawyers are on general strike, therefore, case is adjourned
to 20.01.2021 for arguments, before D.B.



(Mian Muhammad)
Member (E)

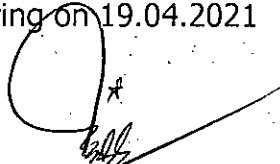


(Rozina Rehman)
Member (J)

20.01.2021

Counsel for the appellant and Addl. AG for the
respondents present.

To come up alongwith 'Service Appeal No. 15/2019
for hearing on 19.04.2021 before the D.B.



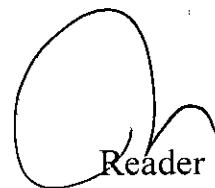
(Mian Muhammad)
Member(E)



Chairman

19.04.2021

Due to demise of the Worthy Chairman, the Tribunal is
non-functional, therefore, case is adjourned to
11.08.2021 for the same as before.



Reader

15.09.2020

Miss Uzma Syed Advocate junior counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former requests for adjournment as senior counsel is not available. Adjourned. To come up for arguments on 29.09.2020 before D.B.



(Atiq ur Rehman Wazir)
Member (E)

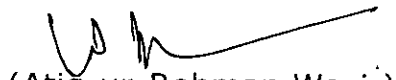


(Rozina Rehman)
Member (J)

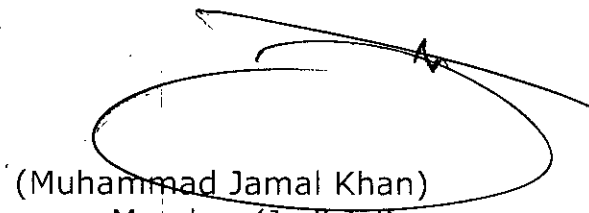
29.09.2020

Mr. Arbab Saif-ul-Kamal, Advocate, for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General alongwith representative of the department Mr. Muhammad Raziq, Head Constable are also present.

Learned counsel request for adjournment for submitting rejoinder. The request is accepted. File to come up for rejoinder and arguments on 11.11.2020 before D.B.



(Atiq-ur-Rehman Wazir)
Member (Executive)



(Muhammad Jamal Khan)
Member (Judicial)

5.5 .2020

Due to COVID19, the case is adjourned to

16/7/2020 for the same as before.

Reader

16.07.2020

Due to COVID-19, the case is adjourned to 20.07.2020
for the same.


Reader

20.07.2020

Syeda Uzma Advocate on behalf of learned counsel for
the appellant and Addl. AG for the respondents present.

Former requests for adjournment as learned senior
counsel for the appellant is engaged in various cases before
Honourable High Court today.

Adjourned to 15.09.2020 for arguments before the D.B.


(Attiq-ur-Rehman)
Member


Chairman

17.01.2020


Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant appeal is adjourned to 05.03.2020 for further proceedings/arguments before D.B.


Member


Member

05.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 05.05.2020 for further proceeding/arguments before D.B.


(Mian Mohammad)
Member


(M. Amin Khan Kundi)
Member

23.08.2019

Appellant in person and Addl. AG alongwith Muhammad Raziq, H.C for the respondents present.

Parawise comments on behalf of respondents received which are placed on record. The appeal is assigned to D.B for arguments on 16.10.2019. The appellant may submit rejoinder, within a fortnight, if so advised.


Chairman

15.10.2019

Junior to counsel for the appellant present. Addl: AG alongwith Mr. M. Raziq, Reader for respondents present. Junior to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 02.12.2019 before D.B.



Member



Member

02.12.2019

Learned counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 17.01.2020 before D.B.



(Hussain Shah)
Member



(M. Amin Khan Kundi)
Member

30.04.2019

Appellant in person and Mr. Usman Ghani District Attorney alongwith Muhammad Raziq, H.C for the respondents present.

Representative of respondents states that written reply has been prepared but not yet vetted and requests for adjournment.

Adjourned to 20.06.2019 before S.B.


Chairman

20.06.2019

Mr. Saadullah Marwat, Advocate submitted Vakalatnama in favour of the appellant. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Raziq, Head Constable for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further adjournment. Adjourned to 26.07.2019 for written reply/comments before S.B.


(Muhammad Amin Khan Kundi)
Member

26.07.2019

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Muhammad Raziq, H.C for the respondents present.

Once again representative of respondents seeks adjournment on the pretext that the requisite reply has though been prepared but is yet to be signed by the respondents.

As a last chance instant matter is adjourned to 28.08.2019 before S.B.


Chairman


08.02.2019

Counsel for the appellant present.

Contends, inter-alia that the absence of appellant was beyond his control as he was involved in blood feud enmity in which one of his brother lost his life. The said aspect was not considered by the competent authority nor by the departmental appellate authority while major punishment of dismissal from service was imposed upon the appellant. Arguing about the apparent delay in submission of departmental appeal, it was contended that the decision thereon was both on its merits as well as the delay. The delay was, therefore, impliedly condoned by the departmental appellate authority.

In view of the above, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up alongwith appeal No. 15/2019 for written reply/comments on 28.03.2019 before S.B.

Appellant Deposited
Security & Process Fee


Chairman

29.03.2019

Appellant in person present. Written reply not submitted. Muhammad Raziq representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 30.04.2019 before S.B


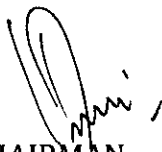

Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 16/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
<p>1-</p> <p>7</p> <p>SCANNED KPST Peshawar</p> <p>2-</p>	<p>04/1/2019</p>	<p>The appeal of Mr. Zar Ali resubmitted today by Mr. Shoukat Ali Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;">  REGISTRAR 4/1/19 </p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>8-2-19</u>.</p> <p style="text-align: right;">  CHAIRMAN </p>

The appeal of Mr. Zar Ali son of Noor Sahib FC No. 616 received today i.e. on 03.01.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Address of the appellant is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 5- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 13 /S.T,

Dt. 4-1- /2019.

4/1/19
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shoukat Ali Adv. Pesh.

Resubmitted after completion of
deficiencies.
Shaukat Ali Akhal
For
Amir
M/19

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A 16 /2019

Zar Ali

VERSUS

I.G Khyber Pakhtunkhwa and others

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal.		1-5
2.	Affidavit.		6
3.	Addresses of parties		7
4.	Copy of FIR No.432	"A"	8
5.	Copy of FIR No.846	"B"	9
6.	Copy of dismissal order	"C"	10
7.	Copy of departmental appeal and rejection order	"D"	11-14
8.	Copy of order	"E"	15-22
9.	Copy of the FIR No.54	"F"	23-24
10.	Other documents		25-53
11.	Wakalat Nama		54

Appellant
Through

Shoukat Ali
Advocate, High Court
Peshawar.

Dated: 03/01/2019

①

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A. 16 /2019

Zar Ali S/O Noor Sahib FC NO.616.

-----*(Appellant)*

VERSUS

1. I.G Khyber Pakhtunkhwa IG office Peshawar
2. CCPO Peshawar
3. SP Head Quarters.
4. ASP Rural Hayatabad inquiry office.
5. Habibullah Khan ASP Hashtnagri Peshawar.
6. SDPO Hayatabad Peshawar.

-----*(Respondents)*

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT -1974 FOR REINSTATEMENT OF
THE APPELLANT IN SERVICE WITH
FULL BACK BENEFITS ARREARS.**

Respectfully Sheweth;

1. That the appellant alongwith his two brothers namely Zikriya Alam FC No.700 and Fakhar E Alam FC NO.1151 served the police department under the control of Respondents for 8/9 years with spotless record.

2

2. That on 23/04/2016 one of brother of the appellant was shot by unknown persons due to which he sustained severe injuries, thus the matter was reported to the local police of PS Badhber vide FIR No.432 dated 23/04/2016 and section 324/427/34 PPC. (Copy of FIR is annexed as annexure "A").

3. That on 12/08/2016 again my said brother was murdered by some unknown persons, and the matter was reported to P.S Badhber vide FIR No.846 dated 12/08/2016 U/S 302/324/34 PPC. (Copy of FIR is annexed as annexure "B")

4. That due to the above incident Appellant remained absent from duty, consequently SP headquarters appointed SDPO/Rural and ASP Hayatabad as inquiry officer in respect of FIR No.54 dated 02/02/2017 U/S 302/324/34 PPC P.S East Cantt and FIR NO.846 U/S 302/324/34 PPC PS Badhber who started the inquiry but astonishingly in said inquiry neither any statement of the appellant re ordered nor any chance of hearing provided, moreover they did not follow the instruction laid down by DSP/legal and even both inquiry officers did not bother to approach the investigation officers of both the cases referred above.

- 5. That in the view of the above disputed inquires the appellant was dismissed from service vide Respondent No.1 order NO. OB No.52 dated 04/01/2017 (Copy of dismissal order is annexed as annexure " ")^u C
- 6. That appellant filed departmental appeal before Respondent No.2 which has been rejected being barred by time vide letter No.OB No.1516-22/PA dated 18/12/2018, and the appellant was condemned unheard. (Copy of departmental appeal and rejection order are annexed as annexure " ")^u D
- 7. That feeling aggrieved from the order of dismissal and rejection of department al appeal, hence the instant appeal inter alia on the following grounds:-

Grounds:

- A. That against appellant an illegal, beyond the law and disputed inquiry was conducted, therefore order of denied by respected and not sustainable but liable to be set aside .
- B. That no chance of hearing clearance was given to the Appellant hence condemned unheard which is against the natural .

4

C. That in FIR No. 846 complaint confirmed that the Appellant was implicated in the FIR on the basis of doubt this is why the pre-arrest bail of the Appellant was confirmed by Mr. Ashfaq Ali Haider ASJ Peshawar vide order dated 26/11/2018, (Copy of order is annexed as annexure "E").

D. That similar in FIR No. 54 the complaint stated in his statement that appellant was implicated on the basis of doubt. (Copy of the FIR No.54 is annexed as annexure "F").

E. That dismissal order of the Respondent is against the police disciplinary Rules 1975.

F. That no personal service in Respondent of the Respondent was ever made.

G. That in view of apex court in such like situation the appellant is entitled for each and every back benefits.

2
11. That any other ground not raised here may
graciously be allowed at the time of
arguments.

It is, therefore, humbly prayed that on
acceptance of the instant appeal, the
Appellant may very graciously be
reinstated in service with full
back benefits.

Any other relief not specifically asked
for may also graciously be extended in
favour of the appellant in the
circumstances of the case.

Appellant
Through
Shokat Ali
Advocate, High Court
Peshwar.

Dated - 02/01/2019

NOTE:-

No such like appeal for the same appellant
upon the same subject matter has earlier been filed
by me, prior to the instant one, before this Hon'ble
Tribunal.

Advocate
[Signature]

6

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A _____/2019

Zar Ali

VERSUS

I.G Khyber Pakhtunkhwa and others

AFFIDAVIT

I, Zar Ali S/O Noor Sahib FC NO.616, do hereby solemnly affirm and declare that all the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

Identified By:

Shoukat Ali
Shoukat Ali
Advocate High Court
Peshawar.

[Signature]
DEPONENT

ATTESTED
Mukhtar Ahmed Ghazwan
Oath Commissioner
District Court, Peshawar

[Signature]
3.11.19

7

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2019

Zar Ali

VERSUS

I.G Khyber Pakhtunkhwa and others

ADDRESSES OF PARTIES

APPELLANT.

Zar Ali S/O Noor Sahib FC NO.616.

ADDRESSES OF RESPONDENTS

1. I.G Khyber Pakhtunkhwa IG office Peshawar
2. CCPO Peshawar
3. SP Head Quarters.
4. ASP Rural Hayatabad inquiry office.
5. Habibullah Khan ASP Hashtnagri Peshawar.
6. SDPO Hayatabad Peshawar.

Through

Appellant

Shoukat Ali

Advocate, High Court
Peshawar.

Dated: 03/01/2019

ابتدائی اطلاع

ابتدائی اطلاع نسبت جرم قابل دست اندازگی کی صورت میں

تاریخ وقت رپورٹ		تاریخ وقت 4 23 ص 40
نام و سکونت اطلاع دہندہ مستفیث		مقام 432
مختصر کیفیت جرم (مدرقعہ) حال اگر کچھ لیا گیا ہو۔		۳۴۰ ۳۴۰ 327
جائے وقوعہ فاصلہ تقاضا سے اور سمت		فرد جو رہتا ہے
نام و سکونت ملزم		
کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو تو بیان کرو		
تقاضا سے روایت کی تاریخ و وقت		

ابتدائی اطلاع کے درج کردہ کی صورت میں جرم کی اطلاع دہندہ نے قریباً ۲۰/۰۶/۲۰۲۳ء
مقام پر اطلاع دی کہ ایک شخص جس کا نام کچھ لیا گیا ہے اور اس کے پاس ایک گاڑی ہے جس کا
نمبر ۳۴۰ ۳۴۰ ۳۲۷ ہے اس کی اطلاع دی کہ اس شخص نے ایک گاڑی چوری کی ہے۔
اس شخص کے بارے میں کوئی اور اطلاع نہیں ہے۔ اس شخص کو روک کر اس کے پاس سے
گاڑی کی کاپی لی جائے۔ اس شخص کے بارے میں کوئی اور اطلاع نہیں ہے۔
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گاڑی کی کاپی لی جائے۔ اس شخص کے بارے میں کوئی اور اطلاع نہیں ہے۔

Ann B ⁴ (9) ✓

Better Copy of FIR

گورنمنٹ پولیس پشاور جہاں نمبر 19/5401 نام سٹور۔ تعداد پانچ ہزار چھ سو 123 اپریل 2007 / لیڈر (کارم سٹور جہاں) خشی نام (پولیس) کارم نمبر 23-20-05

ابتدائی اطلاع پر رپورٹ

ابتدائی اطلاع نسبت مخرم دست اندازی پولیس رپورٹ شدہ زبردستی 15 بجے ضابطہ نوعداری

منبع

تاریخ 16-8-12 وقت 16:25

فائل نمبر 846

1-	تاریخ وقت رپورٹ	12/8/2007 وقت 16:25 بجے جاکندری پر
2-	نام و سکونت اطلاع دہندہ	محمد بابر خان ولد نور محمد خان قوم صدر حیدر آباد قریب 38 سال
3-	تقریب گھنٹہ نوم (مدرسہ) حال اگر بگولہ کیا	حور سائٹ نزد مکان اذان شاہ جہاں استاد سولہ بیٹی بان
4-	ماہ آفر یا ملاقات سے درست	302/34 P.P.C
5-	نام و سکونت مخرم	محمد اسحاق ولد ناصر احمد خان سولہ بیٹی بان سولہ بیٹی بان
6-	کارروائی جو تفتیش کے حوالے کی اگر اطلاع دینے کے بعد وقت ہوا تو وہ کیا ہوگا	بیس سیکورٹی سروس پر مقدمہ درج (جیلز) کیا گیا۔
7-	تھانہ سے راجگی کی تاریخ وقت	لیڈر اسپیشل رپورٹ

ابتدائی اطلاع نیچے لہجے میں گروہ۔ اس وقت آج محمد رفیق نے مسلمان بن جانے سے انکار کیا ہے۔
 سے موصول ہونے پر دست کنشیل سے بہ غمخیزانہ انداز میں جہاں جہاں پر ہوا ہے۔
 جو دانی گھنٹہ صبح اطلاع جاتا وقوعہ یا وقوع پر غمخیزانہ انداز میں جہاں جہاں پر ہوا ہے۔
 قوم جہاں سولہ بیٹی بان کے ہر جہاں پر ہوا ہے۔
 محمد بابر خان ولد نور محمد خان قوم صدر حیدر آباد قریب 38 سال سولہ بیٹی بان سولہ بیٹی بان
 دریا حیدر آباد سولہ بیٹی بان پر ہوا وقوعہ یا وقوع سے قتل ہو گیا ہے۔
 جو دانی گھنٹہ صبح اطلاع جاتا وقوعہ یا وقوع سے قتل ہو گیا ہے۔
 کو کسی شخص پر ہونے کا لہجہ میں ہے۔
 ٹانگے کے آواز سے تیار ہے۔
 ہو گا۔
 محمد بابر خان ولد نور محمد خان قوم صدر حیدر آباد قریب 38 سال سولہ بیٹی بان سولہ بیٹی بان
 خان کے گھر میں ہے۔
 سے باخلاف تذکرہ بان کے

ATTESTED

attested

Handwritten signatures and names.

Handwritten signature at the bottom right.

ORDER

This office order relates to the disposal of formal departmental enquiry against Constable Zar Ali No.616-T of Capital City Police Peshawar on the allegations that he while posted at Police Lines, Peshawar absented himself from lawful duty from 16.07.2016 till date without taking permission or leave.

In this regard, he was issued charge sheet and summary of allegations. SDPO Faqirabad was appointed as E.O. He conducted the enquiry and submitted his report that the defaulter official did not attend the enquiry proceedings. The E.O further recommended major punishment for the defaulter official vide Enquiry Report No.59/ST dated 17.11.2016.

Upon the fining of E.O, he was issued final show cause notice & delivered him on home address through local Police PS Badaber which received by Fazal Rabi Nazim U/C 153 Aba Khel Surizai Bala Badaber but he failed to submit his reply in stipulated period or appear before this office.

In the light of recommendations of E.O & other material available on record, the undersigned came to conclusion that the alleged official found guilty of this misconduct. Therefore, he is hereby dismissed from service under Police & Disciplinary Rules-1975 with immediate effect. Hence, the period he remained absent from 16.07.2016 till date is treated without pay.

Emad (22)

Fazal Rabi Nazim
**SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR**

OB. NO. 52 / Dated 4/1/2017

No. 75-42/PA/SP / dated Peshawar the 5/1/2017

Copy of above is forwarded for information & n/action to:

- ✓ Capital City Police Officer, Peshawar.
- ✓ SSP Traffic, Peshawar
- ✓ DSP/HQrs, Peshawar.
- ✓ Pay Office, OASI, CRC & FMC along-with complete departmental file.
- ✓ Officials concerned.

attested (1/2017)

[Handwritten signature]

15
Am e
230-6
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183-5
16

2

Annex D²

No 319-11 LB
17-9-2018

712
12.9.18

To
The Worthy
Peshawar Khyber Pakhtunkhwa.

Subject: Departmental Appeal the order dated 05.01.2017 whereby the undersign was awarded major penalty of dismissed from service.

Prayer in appeal:

On acceptance of this departmental appeal I may kindly be re-instated in service with all back benefits

RME
Put up Record
SDSP/690
17-9-2018

Respected Sir,

I respectfully submit my departmental appeal as under:-

1. That the undersign was initially enlisted as Constable in the Police Department, and has at his credit a bright and spot less service career.
2. It is pertinent to mention here that ever since his enlistment the undersign has performed his duties as assigned to him with zeal and devotion and there was no complaint whatsoever regarding his performance.
3. That while the undersign while serving in the department, was falsely implicated in a criminal case in F.I.R No. 54 dated 02.02.2017 under Section 302,324,34 PPC Police Station East Cant Peshawar.
4. That the undersign was also charged in another criminal case FIR no 846 dated 12.08.2016 under section 302,34 PPC police station Badh Bir Peshawar.
5. That the undersign was malafidely charged in the above mentioned criminal cases.
6. That the undersign approached the competent court and filed his Bail Before Arrest application. (Copy of the application is attached)
7. That partial inquiry was conducted against me and the inquiry officer without associating the undersign with the inquiry proceedings conducted ex-parte inquiry and gave his findings wherein he recommended the undersign for major punishment.

attested
3/11/18

8. That thereafter the undersign when reported for duty, he was informed that he has already been dismissed from service vide order dated 05.01.2017, however the penalty order never communicated to the undersign.
9. That the dismissal orders is illegal, unlawful, without lawful authority, against the law and facts, hence liable to be set aside on the following grounds;

GROUND OF SERVICE APPEAL:

- A. That the undersign has not been treated in accordance with law, and his right secured and guaranteed under the law have been violated.
- B. That the charges levelled against the undersign were never proved in the departmental enquiry albeit the enquiry officer illegally and unlawfully proved the undersign guilty.
- C. That no proper procedure has been followed before awarding the major punishment to the undersign, the undersign has not been served with any charge sheet or statement of allegation, no proper inquiry has been conducted, nor the undersign was ever associated properly with the inquiry proceedings, statement of witnesses, if any, were never taken in presence of the undersign, nor the undersign was allowed opportunity of cross examination, thus the whole proceedings are defective in the eye of law and orders based on such defective proceedings are liable to be set aside.
- D. That the undersign has not been allowed opportunity of personal hearing before awarding him the major punishment of removal from service, thus he has been condemned unheard.
- E. That the undersign never committed any act or omission which could be termed as misconduct, he was falsely implicated in the criminal case and appeared before the court, the respondent should have waited for the out come of the trial of the undersign albeit he has been illegally awarded the major penalty of dismissal from service.
- F. That the Superior Courts have always held that mere filing of FIR does not ipso-facto proves a person guilty of the commission of the offence, rather he would be presumed innocent unless convicted by the court of competent jurisdiction. So on this also the impugned orders are liable to be set-aside.

attested

ROOH-UN-NISA
Advocate High Court & Federal Shariat Court
Suit # 9-10/A, 1st Floor, Siddique Mansion
G.T Road, Hashnagri Peshawar

Amir
3/11

G. That the case of the undersign is covered under FR-54 which provides that:

"F.R. 54---Where a Government Servant has been dismissed or removed is reinstated, the revising or appellate authority may grant to him for the period of his absence from duty—

- a) If he is honorably acquitted, the full pay to which he would have been entitled if he had not been dismissed or removed, and, by an order to be separately recorded, any allowance of which he was in receipt prior to his dismissal removal; or*
 - b) If otherwise, such portion of such pay and allowances as the revising or appellate authority may prescribed.*
- In a case falling under clause (a), the period of absence from duty will be treated as a period spent on duty unless the revising appellate authority so directs.*

H. That the Inquiry Officer has acted illegally and in violation of law by claiming to have proved the charges without any proof or evidence.

I. That during the inquiry the statement of witnesses were never taken in presence of the undersign, nor the undersign was allowed opportunity to cross examine those, who may have deposed against him.

J. That the undersign has at his credit bright and spotless service career of about seven years, the penalty imposed upon him is too harsh and liable to be set aside.

K. That the undersign is jobless since his illegal dismissal from service.

L. That the undersign seeks the permission of this Honourable Tribunal to rely on additional grounds at the hearing of this appeal.

It is therefore prayed that on acceptance of this departmental appeal the impugned orders dated 05.01.2017, may please be set-aside and the undersign be reinstated into service with all back benefits.

attested

MOON UN-NISA
Advocate High Court & Federal Shariat Court
Sukr # 9-101A, 1st Floor, Siddique Mansar
G.T Road, Hashimnagar Peshawar

[Signature]
3/1/19

Undersign

Constable Zar Ali
no 616-T Capital City
Police Peshawar.

0316-9097469
0301-8000316

DSP/L
For comments

ly/PA
2 up
12/1



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

Phone No. 091-9210989
Fax No. 091-9212597

14

ORDER.

This order will dispose off the departmental appeal preferred by Ex-Constable Zar Ali No.616/T who was awarded the major punishment of "Dismissal from Service" by SP/HQrs Peshawar vide OB No 52, dated 14-01-2017.

2- The allegations leveled against him were that he while posted at Police Lines Peshawar absented himself from his lawful duty w.e from 16-07-2016 till his dismissal i.e 04-01-2017 for a total period of 05 and 18 days. Later on he was also charged in two criminal cases vide FIR No.54, dated 02-02-2017 u/s 302/324/34/PPC PS East Cantt and FIR No.846, dated 12-08-2017 u/s 302/324/34/ppc PS Badabher.

3- He was issued charge sheet with statement of allegations by SP/HQrs Peshawar. The SDPO Faqir Abad was appointed as enquiry officer. The enquiry officer conducted enquiry and submitted his report that the defaulter official did not attend the enquiry proceedings and hence recommended him for major punishment. He was issued final show cause notice through local Police of PS Badaber but he failed to reply and hence the competent authority awarded him the above major punishment.

4- He was heard in person in O.R. The relevant record perused along-with his explanation but he failed to submit any plausible explanation. Further more the appellant has also admitted that he was charged in two murder cases and ^{had} was gone into hiding and reportedly declared as PO in the said cases. Therefore his appeal for reinstatement in service is **dismissed/rejected being also time bared for 01 year and 08 months.**

(QAZI JAMIL UR REHMAN)PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 1516-22 /PA dated Peshawar the 18-12 2018

Copies for information and n/a to the:-

1. SP/Cantt: Peshawar
2. DSP/HQrs Peshawar.
3. BO/OASi/CRC for making necessary entry in his S.Roll.
- ✓ 4. FMC along with FM
5. Official concerned.

attested

Attested by SP, Capital City Police Officer, Peshawar
Sub-Station, Police House, Mirza Aslam Khan
Peshawar

Q. Jamil
3/1/19

Ann E 15

بعدالت جناب عامر علی ایڈیشنل ڈسٹرکٹ و سیشن جج-II پشاور

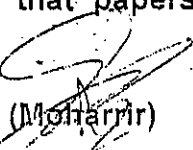
ایڈیکس

نمبر 11 / BBA
 ریسٹ 26 11 / 18
 فیصلہ 26 11 / 18
 صفحات 37

سپرکار
 فیصلہ ریکارڈ

نمبر	تفصیل	صفحہ
1-1	ڈیڑھ ہفتے آرڈر ریٹرنل سے ملنے والے درخواستیہ ضابطہ نمبر 1	
19-	رہنہ کی رقم پر EXP 2 EXPB EXPA	
32-	آرڈر کی رقم پر رہنہ کی رقم پر رہنہ کی رقم پر	
		37
		37

Certified that papers, as detailed above have properly been indexed.


 (Moharrir)

Countersigned by:



(AMER ALI)

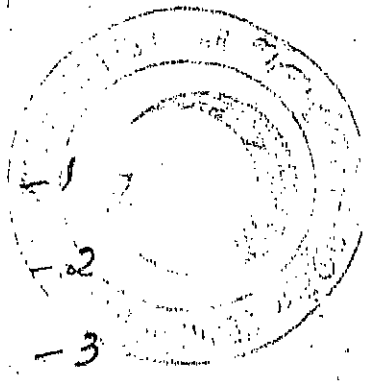
Additional District & Sessions Judge-II
 Peshawar.

ATTESTED

01/11/2018

محمد رفیع صاحب سید احمد علی صاحب
کے والدین صاحب سیشن جج صاحب پشاور

نمبر 2979
تاریخ 19/7/18
11/11/18



1- محمد رفیع صاحب

2- محمد رفیع صاحب
3- محمد رفیع صاحب

بیت

1- محمد رفیع صاحب
2- محمد رفیع صاحب

846
12/08/2016
302/34
PPC

Superintendent
Sessions Court, Peshawar
19-7-18

محمد رفیع صاحب سیشن جج صاحب پشاور
کے والدین صاحب سیشن جج صاحب پشاور

محمد رفیع صاحب سیشن جج صاحب پشاور

محمد رفیع صاحب سیشن جج صاحب پشاور

محمد رفیع صاحب سیشن جج صاحب پشاور

attested

ATTESTED

A - یہاں سیدین / ملزمان نے لکھ دیا ہے اور گناہ ہے

B - یہاں سیدین / ملزمان کو قصص میں اور بددینی کا وجہ ہے
قدردان سے ملوث کیا گیا ہے

C - یہاں سیدین / ملزمان نے صرف مثل قدر سے لکھی ہے
شہادت موجود ہے

D - یہاں سیدین / ملزمان نے قدر سے مزید لکھتی ہے
E - یہاں قدر سے ملوث ہے 848

302
DPC
16/08/08
18/07/08
Cross case

F - یہاں Cross case سے ملزمان کی ضمانت ہو چکی ہے

G - یہاں سیدین نے لکھتے ہیں کہ اس میں رافی نامہ ہے

H - یہاں سیدین / ملزمان نے کہا ہے کہ شہادت ہے اور لکھتے ہیں
یہ سب کی ضمانت ہے

I - یہاں سیدین نے لکھا ہے کہ یہ سب کی ضمانت ہے

Dr-1
Sessions Court, Pe
19-7

گناہ سے ملوث ہے اور لکھتے ہیں

یہاں سیدین / ملزمان نے لکھا ہے کہ یہ سب کی ضمانت ہے



17301-4256629

یہاں سیدین / ملزمان نے لکھا ہے کہ یہ سب کی ضمانت ہے

ATTES

FORM "A" FORM OF ORDER SHEET

18

Court of _____

Case No. _____ of _____

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel, where necessary
1	2	3
Order...01	19/7/2018	<p>Bail Before Arrest Application/Bail Application /Bail Cancellation Application presented by Mr. <u>(Signature)</u> Advocate.</p> <p>To be put up before Mr. <u>(Signature)</u></p> <p>Learned Addl: District & Sessions Judge <u>(Signature)</u> Peshawar for further orders.</p> <p style="text-align: right;">(Signature) Superintendent, Sessions Court, Peshawar</p> <p>BBA petition received: It be registered.</p> <p>Accused/petitioners namely (1) Fakh-r-e-Alam (2) Zar Ali (3) Muhammad Amin R/o Surizai Bala, Peshawar have submitted this bail before arrest application in case FIR No. 846 dated 12.08.2016 u/s 302/31 PPC registered at PS Badaber Peshawar.</p> <p>The petitioners have contended malafide and their fals involvement in the instant case. The petition is supported by a affidavit. In the absence of any record before this court, the petitioners named above are admitted to ad interim pre-arrest bail subject to furnishing of bail bond in the sum of Rs.70,000 with two local and reliable sureties separately for each accused each in the like amounts to the satisfaction of this Court.</p> <p>Petitioners are directed to join investigation and to attend court on each and every date of hearing.</p> <p>Notice and record for <u>30/7/10</u></p> <p><u>Announced:</u> 19/07/2018</p> <p style="text-align: right;">(Signature) (ISHFAQ ALI HAIDER) AD&SJ-V, Peshawar</p>

attested

ROOH-UN-NISA
Advocate High Court & Federal Shariat Court
B-19-10/A, 1st Floor, Siddique Mansion
Peshawar

(Signature)
3/7/19

ATTESTED

01 DEC 2018

(Signature)

Session Court, Peshawar

Or.2
30.07.2018

Ms. Haseena, APP for the State present.

Accused/petitioners on ad-interim bail along with
counsel present.

Record not received.

Fresh notice to complainant and record be
requisitioned for 14/8/18 before the Court of Duty
Judge.

[Signature]
(Ishfaq Ali Haider)
AD&SJ-V, Peshawar

Order....03
10/08/2018

BBA petition received from the court of learned
ADJ-V, Peshawar. Learned SPP Mr. Said Nazeer for the
state present. Accused/petitioners on ad-interim bail are
present.

Record not received. Be requisitioned for
27/8/18 before the learned Duty Judge, Peshawar.

[Signature]
(Syed Kamal Hussain Shah)
AD&SJ-XV, Peshawar
Duty Judge

ATTESTED

~~01 DEC 2018~~

(Examiner)

Session Court Peshawar

ISA
Peshawar District Court
Advocate General
Peshawar
61 Manshor



NO. 846

Statement of Mst. Shazia (widow of deceased ijaz) r/o Badaber, Peshawar on oath:-

On 12.08.2016 my deceased husband was murdered for which my brother in law complainant Muhammad Riaz had recorded a report No.846 dated 12.08.2016 u/s 302-34 PPC at PS Badaber wherein on satisfaction he charged accused Muhammad Amin son of Saobar, Fakhre Alam, Zar Ali sons of Noor Sahib.

Since there was no witness to the occurrence of the murder of my deceased husband and only on satisfaction the accused referred to above were charged, therefore, we on satisfaction came to know that the accused mentioned above are innocent and were merely charged on suspicion, therefore, I and all my family have satisfied as well as they have also satisfied ourselves that they are innocent in the instant case, therefore I am not interest in their prosecution and have got no objection on the confirmation of their pre arrest bail as well as their acquittal at the stage of trial.

RO & AC
20/10/2018

Mst. Shazia
17301-9293202-0



[Signature]
Muhammad Saied Amjad,
ADJ/ASL XI/JSC, Peshawar

ATTESTED

01 DEC 2018

(Signature)
Session Court Peshawar

attested

ROOH-UN-NISA
Advocate High Court & Federal Shariat Court
H # 9-10/A, 1st Floor, Siddique Mansion
GT Road, Hashnagri Peshawar

[Signature]
3/10/18

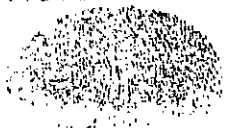
FIR NO. 846

Statement of Complainant Muhammad Riaz son of Nawab Khan (brother of deceased) r/o Badaber, Peshawar on oath:-

On 12.08.2016 I along with my brother came on a motorbike to Surezai bala to the Hujra of one Tehsin Ullah Ex-Nazim of Surezai Bala, there my brother parked his motorcycle outside the hujra and left me there and he my brother namely Ijaz left for somewhere. I went inside the hujra. After some time I heard the fire shots and when I came out from the hujra I came to know that somebody had murdered my brother and on my arrival I found his dead body. I with my own eyes did not see anyone as to who murdered my deceased brother. However, on satisfaction I charged Muhammad Amin , Fakhre ALam, Zar Ali all sons of Noor Sahib r/o Surezai bala. As I am not the eye,witness and have satisfied myself vice versa the accused, therefore, I am not interested in their prosecution because of their innocence as we are fully satisfied about their non-involvement their crime of our deceased brother mentioned above, if the honourable court either confirm their pre arrest bail or acquit them even of the charges, therefore, have got no objection.

RO & AC
20/10/2018

Complainant Muhammad Riaz
17301-1351251-1



محمد ریاض

Muhammad Saeed Amjad,
ADJ/ASLXI/JSC, Peshawar

ATTESTED

11 OCT 2018

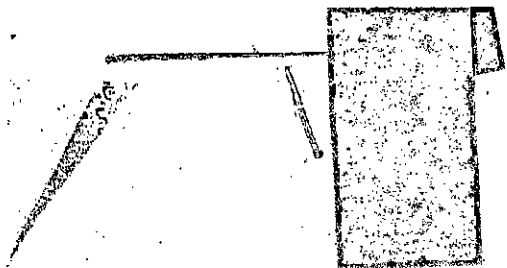
(Examined)

Sasibul Qadir Peshawar

attested
MOOH-UN-NIS
Advocate High Court & Federal Shariat Court
#9-10/A, 1st Floor, Siddique Mansab
G.T Road, Hashnagri Peshawar

Amjad
3/10/18

25



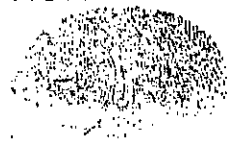
FIR NO. 846

Statement of Complainant Muhammad Riaz son of Nawab Khan (brother of deceased) r/o Badaber, Peshawar on oath:-

On 12.08.2016 I along with my brother came on a motorbike to Surezai bala to the Hujra of one Tehsin Ullah Ex-Nazim of Surezai Bala, there my brother parked his motorcycle outside the hujra and left me there and he my brother namely Ijaz left for somewhere. I went inside the hujra. After some time I heard the fire shots and when I came out from the hujra I came to know that somebody had murdered my brother and on my arrival I found his dead body. I with my own eyes did not see anyone as to who murdered my deceased brother. However, on satisfaction I charged Muhammad Amin , Fakhre ALam, Zar Ali all sons of Noor Sahib r/o Surezai bala, As I am not the eye witness and have satisfied myself vice versa the accused, therefore, I am not interested in their prosecution because of their innocence as we are fully satisfied about their non-involvement their crime of our deceased brother mentioned above, if the honourable court either confirm their pre arrest bail or acquit them even of the charges, therefore, have got no objection.

RO & AC
20/10/2018

Complainant Muhammad Riaz
17301-1351251-1



محمد ریا ز

Muhammad Saeed Anjad,
ADJ/ASLX/SC, Peshawar

ATTESTED

01 DEC 2018

(Examiner)
Session Court Peshawar

attested
ROOH-UN-NIS
Advocate High Court & Federal Shariat Court
9-10/A, 1st Floor, Siddique Mansana
G.T Road, Hashnagri Peshawar

3/11/19

(21)

IN THE COURT OF MUHAMMAD SAEED AMJAD,
ADDL. DISTRICT & SESSIONS JUDGE-XI, PESHAWAR.

BBA petition No. 2979 of 2018

9/11/18
Or.....
09.11.2018

2979
B.B.A
no 30

"Fakhre Alam etc vs the State etc"

Accused / petitioner on ad-interim pre-arrest bail with

counsel present. APP for the State present. Record received and placed on file.

2. The accused/petitioner Fakhre Alam and Zar Ali sons of Noor Sahib and Muhammad Amin son of Sanobar seek confirmation of their pre-arrest bail in case FIR No. 846 dated 12.08.2016 U/S 302 / 34 PPC PS Badaber, Peshawar.

3. Arguments heard and record gone through.

4. On 20.10.2016 complainant Muhammad Riaz son of Nawab Khan & Mst. Shazia (widow of deceased) appeared before the court and stated at the bar that though the accused/petitioners were charged by them on in the FIR for the commission of deceased Ijaz but as none has witnessed the occurrence and the accused/petitioners have been charged on suspicion. That now they are satisfied regarding the innocence of accused / petitioners and are no more interested in the prosecution of the case. That they have got no objection on confirmation of instant BBA petition. To this effect their separate statements are also recorded, which are placed on file.

5. It is evident from the record that though the accused / petitioners have directly been charged in the FIR but

attested

ON-UN-NO
District & Federal Shariat
Court, 1st Floor, Saddique
Road, Peshawar

ATTESTED

09.11.2018

hittedly the occurrence is unseen and the accused / petitioners have been charged on the basis of satisfaction ~~but~~ no source of satisfaction has been disclosed by the complainant. Moreover, no specific role of firing has been attributed to any of them rather they have been charged in a collective form. Furthermore, neither the accused / petitioners have any previous criminal history nor there is any other incriminating evidence against them on record. Moreover, the complainant party also no more charges the accused / petitioners and have also got no objection upon the confirmation of instant BBA petition. Hence in view of above, the case of the accused/ petitioners has not only become as one of further inquiry but false implication of the accused / petitioners in the instant case with malafide intention on the part of the prosecution cannot be ruled out at this stage. In this regard guidance is being taken place from an unreported judgment of hon'ble Peshawar High Court, Peshawar in BA No. 849-P/2013 dated 11.07.2013, wherein his lordship has held as under.

Q

"If this is the position when the complainant and his witnesses have refused to charge the accused in any manner in the trial court, then the other evidence including those of the police officials would not be sufficient to carry conviction on a capital charge"

attested

Reference may also be made to 1999 P Cr.L.J 1107 [Lahor].

[Signature]
[Signature]

AT
9 10 2013
Session

کریمنل جیسٹس ایجنسی (کریمنل) لاہور۔ سیشن عدالت لاہور۔ رجسٹرڈ نمبر: 1785246۔ (تاریخ: 15.05.2011)۔

ابتدائی اطلاعی رپورٹ

مقامی جرم قابل دست اندازی پولیس رپورٹ شدہ زبردستی 152 مجموعہ ضابطہ نو جداری

شمارہ	59
منطقہ	17
تاریخ	02 مئی 2011ء وقت 16:25
تاریخ و وقت رپورٹ	02 مئی 2011ء وقت 15:10
تاریخ و وقت اطلاع دہندہ	34 - 324 - 302
نام و ساکنت اطلاع دہندہ	محمد علی بیگ
مختصر کیفیت جرم (معدومہ) حال اگر کچھ لاکھا ہو۔	مختصر کیفیت جرم (معدومہ) حال اگر کچھ لاکھا ہو۔
جائے وقوعہ حاصل کنندہ اور سہیل	محمد علی بیگ
نام و ساکنت ظالم	محمد علی بیگ
کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع ذریعہ کرنے میں توقف ہوا ہو تو وجہ بیان کر	محمد علی بیگ
قائد سے روائی کی تاریخ و وقت	محمد علی بیگ

حقیقت یہ ہے کہ... (دetailed handwritten report text follows, describing the incident and the individuals involved, including names like Muhammad Ali Beg, LPH, and others. The text is written in Urdu and provides a detailed account of the alleged crime and the investigation process.)

attested

کریمنل جیسٹس ایجنسی (کریمنل) لاہور۔ سیشن عدالت لاہور۔ رجسٹرڈ نمبر: 1785246۔

Accepted

Handwritten signature and date.

Handwritten signature and date.

24

Handwritten text in Urdu, likely a legal statement or affidavit, mentioning a court case and a date.

F-10
S.P.O. E. court
2.3.2017

attested
JH-UN-NISA
Advocate High Court & Federal Shariat Court
Suit # 9-10/A, 1st Floor, Siddique Mansion
GT Road, Machhwar Peshawar

Handwritten signature of the attesting officer.

True Copy
ATTESTED

اطلاع کے لیے اطلاع دہندہ کا دستخط اور گواہ کی سر یا نشان لگایا جائے گا۔ اور اس پر تحریر کنندہ ابتدائی اطلاع کا دستخط اور گواہ کے دستخط اور گواہ کی سر یا نشان لگایا جائے گا۔
ایک ٹرم یا مشورہ علی الترتیب دیکھنا یا مشورہ ایضاً یا افغانستان جہاں موجود ہوں، لکھنا چاہئے۔

محکمہ اہل سنت و جماعت، کراچی

- 1- قسطنطنیہ
- 2- زر علی لہران، خور و صواب سائنس، محلہ شاہ کوہ، ضلع
- سولہ نئی بالترقیہ و صناعہ لہور

نام

- 1- سرکار
- 2- خورشید ولد زیارت گل سنگھ، سولہ نئی بالترقیہ و صناعہ لہور

علاقہ 54 فوراً 02/02/2017 جرم 302, 324 34 PPC حکمانہ ترقی

درخواست گزار اہل سنت و جماعت
پیر صاحبان، قسطنطنیہ

Or-1
Superintendent
Sessions Court, Peshawar
19-7-18

صاحب عالی و صاحبین اہل سنت و جماعت، کراچی

- 1- یہ کہ صاحبین اہل سنت و جماعت، کراچی نے درخواست کی ہے کہ
- محکمہ پولیس، کراچی کی گرفتاری کے درپے ہے
- 2- یہ کہ صاحبین اہل سنت و جماعت، کراچی نے درخواست کی ہے کہ
- پیر صاحبان کی گرفتاری کے لیے

ATTESTED

31/07/2018

یہ کہ سیدین امین نامزدہ حبرم اور گناہ

- A

یہ کہ سیدین امین کو قفس شک اور پریشانی بنا کر

- B

عدالت میں لایا گیا ہے۔

یہ کہ سیدین امین نے عدالت میں مقدمہ پر کوئی عین لکھنا

- C

شکایت موجود نہ ہے۔

یہ کہ سیدین امین کے حشرے میں مزید تفتیش کی ضرورت ہے

- D

یہ کہ مقدمہ عدالت میں سزا کی غلطی پر اصرار کے

- E

اصحاحات کے درپے درپے ہیں

یہ کہ مابین فریقین مقدمہ عدالت میں راجح نامہ موجود ہے

- F

یہ کہ سیدین امین کے پاس جائیدادیں ہیں اور خانہ

- G

پر اصرار کی صورت میں عدالت میں عدالت میں لایا گیا ہے

OF-1
Superintendent
Sessions Court, Peshawar
19-7-18

یہ کہ سیدین امین کو قفس شک لکھنا

- I

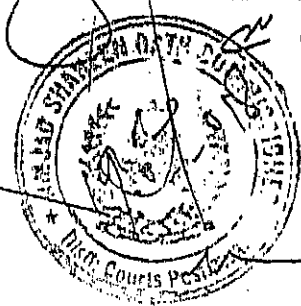
لکھنا سزا کے لئے عدالت میں لایا گیا ہے

بازمانی

سیدین امین نے خانہ پر اصرار کیا ہے

یہ کہ سیدین امین نے خانہ پر اصرار کیا ہے

ATTESTED
دفعہ 147 کے تحت
درست و صحیح ہے



17301-4256625-9

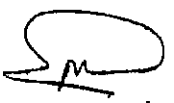
سیدین امین نے خانہ پر اصرار کیا ہے

امین امین
Pesh

ATTESTED
2812

FORM "A"
FORM OF ORDER SHEET

Court of _____ of _____
Case No. _____

Serial No. of Order or Proceeding	Date of Order or Proceeding	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel, where necessary
1	2	3
	19/7/2018	Bail Before Arrest Application/Bail Application /Bail Cancellation Application presented by Mr. _____ Advocate. To be put up before Mr. _____ Learned Addl: District & Sessions Judge _____ Peshawar for further orders. <div style="text-align: right;">  Superintendent, Sessions Court, Peshawar </div>

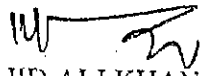
Order...01
19/07/2018

Application for bail before arrest received. Be Checked...

Accused/Petitioners **Fakhar Alam & Zar Ali sons of Noor Sahib r/o Surezai Bala, Peshawar** alongwith their counsel present. They apprehend their arrest in case FIR No. 54 dated 02.2.2017 U/S 302/324/34 PPC registered at Police Station East Cantt Peshawar and seek the subject bail on the grounds of false implication and *mala fide*. The petition is supported by an affidavit.

In the absence of record accused/ petitioners are admitted to ad-interim pre-arrest bail on furnishing bonds in sum of **Rs.90,000/-** with two sureties each in the like amount to the satisfaction of this court. It is further directed that they shall join the investigation and attend the court on each date of hearing regularly.

Notice to the State, complainant and record be also requisitioned for 30/7/18 before court concerned.


WAJID ALI KHAN,
 ASJ-IX/ Duty Judge,
 Peshawar

ATTACHED

01 DEC 2018

(Exa) _____
 Sessions Court, Peshawar

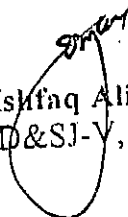
Ms. Haseena, APP for the State present.

Case file received.

Accused/petitioners on ad-interim bail along with counsel present.

Record not received.

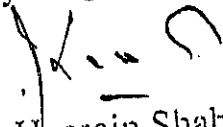
Record be requisitioned for 27/8/18 before the Court of Duty Judge.


(Ishfaq Ali Haider)
AD&SJ-V, Peshawar

Order....03
10/08/2018

BBA petition received from the court of learned ADJ-V, Peshawar. Learned SPP Mr. Said Nazeer for the state present. Accused/petitioners on ad-interim bail are present.

Record not received. Be requisitioned for 27/8/18 before the learned Duty Judge, Peshawar.


(Syed Kamal Hussain Shah)
AD&SJ-XV, Peshawar
Duty Judge

AT 10

31 AUG 2018

(Exam)
Session Court, Peshawar

28

IN THE COURT OF AMER ALI,
ADDITIONAL SESSIONS JUDGE -II, PESHAWAR

Fakhar-e-Alam Vs State

Case File # _____/BA of 2018

ORDER
26/11/2018

1. Petitioners Fakhar-e-Alam and Zar Ali on ad-interim pre-arrest bail along with counsel present. Mr. Shireen Khan SPP for the state present. Complainant absent.
2. Petitioners seek confirmation of their pre-arrest bail in case FIR No. 54 dated 02.02.2017 u/s 302/324/34 PPC of Police Station East Cantt, Peshawar.
3. On 15.09.2018 complainant Khurshid Khan alongwith Ziarat Gul (father of deceased Miraj) appeared before the Court and stated that they have patched up the matter with the accused/petitioners. In this respect their joint statement recorded wherein they submitted compromise affidavit alongwith Proforma for Qisas and Diyat as Ex.PA & Ex.PB. They also stated that other legal heirs of the deceased have also compromised the matter. On 20.10.2018 Mst. Khalida (widow of deceased), Kamran (son of deceased) also appeared before the Court and they also recorded their joint statement regarding the compromise. On 30.10.2018 Mst. Haya Jana Bibi wife of Ziarat Gul (mother of deceased) and Sana

RECORDED

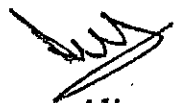
26/11/2018

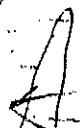
(29) (12)

(daughter of deceased Miraj) also appeared and their joint-statement also recorded in respect of compromise. All the legal heirs of the deceased have expressed their no objection on the confirmation of pre-arrest bail of the petitioners.

4. Verified list of legal heirs of the deceased is present in the judicial record of the trial of the co-accused Noor Sahib also fixed for hearing for today.
5. The offence for which the petitioners stand charged are compoundable and the complainant along with other legal heirs of the deceased have effected a compromise with the petitioners which seems to be genuine and in the best interest of the parties. Hence, the same is accepted.
6. Consequently, the petition in hand is accepted on the basis of compromise and the ad interim pre arrest bail already granted to the petitioner is hereby confirmed on the existing bail bond. Copy of this order be placed on Judicial and police file.
7. Supplementary challan of the accused/petitioners Fakhar-e-Alam and Zar Ali placed on the file of co-accused Noor Sahib for expeditious disposal of the case.
8. File be consigned to Record Room after its completion.

Announced
26/11/2018


Amer Ali,
Additional Sessions Judge-II,
Peshawar

No:	18934
Dated at:	14/12/18
Case No:	9200/c-1-23
Signature:	
Dated of Pen:	21/12/18
Date:	

ATTENDED
01/12/18
Session

Joint statement of the legal heirs of the deceased Miraj Gul son of Ziarat Gul r/
Surezai Bala, Peshawar on oath:-

- (1) Mst. Khalida (mother of deceased)
- (2) Mst. Khalida (widow)
- (3) Kamran (son)
- (4) Kamran (son)

We and Ziarat Gul who is the father of the deceased and whose statement is already been recorded before this court along with Khurshid complainant are the legal heirs of the deceased vide FIR No. 54 dated 2.2.2017 u/s 302-324-34 PPC registered PS East cantt.

Accused namely Zar Ali Khan and Fakhre Alam Khan both sons of Noor Sahib Surezai bala, Peshawar are charged along with their father named above for murder of Miraj Gul and the said Noor Sahib has already been released on bail by Hon'ble High Court, Peshawar.

Now with the intervention of the elders of the locality, have patched up the matter with the above named accused and are no more interested in their prosecution as we all have waived off our right of Qisas against all the three accused, therefore the honorable court confirms the pre-arrest bail of the two accused, namely Zar Ali Khan, Fakhre Alam Khan and even if acquit the three accused (Zar Ali, Fakhre Alam and Noor Sahib) so we have got no objection.

RO & AC
20/10/2018

(1) Mst. Khalida (widow) 17301-9988448-4

(2) Kamran (son) 173018781868-1

Kamran

Muhammad Saad Amjad,
ADJ/ASJ-XI/SC, Peshawar

A
Peshawar

31 46

Joint statement of:

1. Haya Jana Bibi wife of Ziarat Gul (mother of deceased)
2. Sana daughter of deceased (Miraj) both residents of mohallah Shatokhail Surizai Bala, Badhber, Peshawar on oath:

We are the legal heirs of the deceased Miraj, in case FIR No. 54 dated 2/2017 under section 302/324/34 PPC of police station East cantt, Peshawar.

Now through the intervention of elders of the locality, we have effected a genuine compromise with the accused/petitioners namely Fakhre Alam and Zar Ali (petitioners) and Noor Sahib already on bail, pardon them and have got no objection on confirmation of their BBA in the instant case and later-on on their acquittal during the trial of the case. The compromise deed already exhibited as Ex:PA whereas proforma for Qisas & Dyat is already exhibited as Ex:PB. Copy of CNIC of Haya Jana Bib is Ex:PZ. Copy of CNIC of the identifier is Ex:PZ/I.

R.O & A.C

Dated: 30/10/2018

Haya Jana Bibi
CNIC No. 17301-5316373-0

Sana
CNIC No. Nil. *Sana*

Identified by (grand father of Sana)

Ziarat Gul,
CNIC No: 17301-1850733-7

Muhammad Saqeeb Amjad,
Additional Sessions Judge-XI
Peshawar.

ATTESTED

2018
Peshawar

32

137

Joint statement of:

- 1. Ziarat Gul son of Muhammed Zaman (father deceased Miraj),
- 2. Khurshid (co-plainant) son of the deceased (deceased) residents of Surza Bala Peshawar

We are complainant party heirs of the deceased Miraj, in case FIR No. 4 dated 2/2/2017 in Section 02 of 4/34 PPC of PS Sharki (District Cantt), Peshawar. We are complainant party Khurshid. We are lodged by the

Notwithstanding the intervention of elders effected a general compromise was made between the complainant party and Fakhr Azam both sons of Sahib name of Aziz / Allal. We have taken the right favour of the complainant party. We have not confirmed their B.L. in the presence of Qisas and Diyat in confirmation of their B.L. In this regard, the complainant party Ex:PA and prosecution for Ex:PB are correct and correctly bear our signature and impression. Copies of our CNICs are Ex:PA and Ex:PB 2 respectively.

R.O.&A.C.
Dated: 15/9/2018

Ziarat Gul,
CNIC No. 17301-7350793-7

Khurshid,
CNIC No. 17301-978624

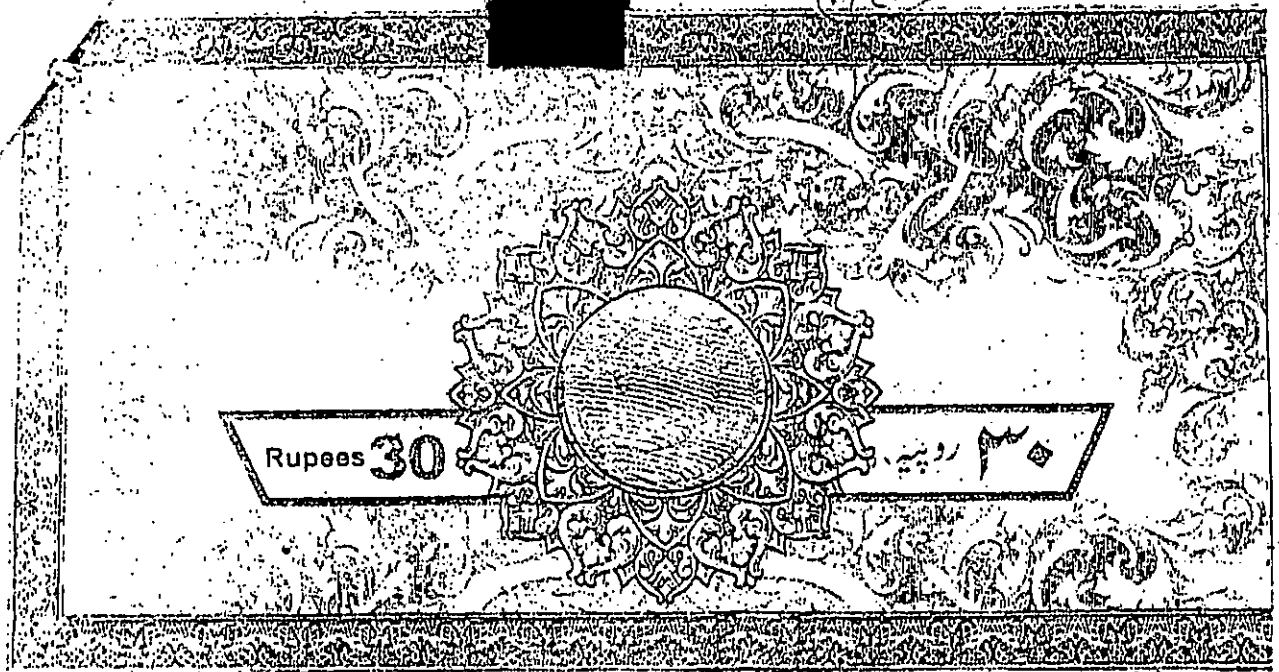
Identified by (elders of locality)
Gul Imran son of Muhammad Aziz
R/O Bazid Khail Peshawar,
CNIC No. 17301-7600718-3

Malik Manzoor Khan son of Jaifoor Khan
R/O Bahadur Kalay, Marozay, Peshawar
CNIC No. 17301-1634367-9

Muhammad Saeed Amjad,
Additional Sessions Judge-XI,
Peshawar

ATTACHED

2018



EXPT
 اعلیٰ

راضی ناصبہ برائے تنظیمیہ مقدمہ

۱۔ لیا نکہ مسیان جو شیروار وزارت علی گند سوزیزہ اور تحصیل قلم تیار اور فریق اول اکہلیٹ۔ زیر علی۔
 یکم ملک پرائیمری سب سے فریق دوم کے ہیں برسات باہم بڑے بڑے ہذا مقرر ہذا مقرر ہیں کہ فریق اول اکہلیٹ ہے ایک
 بری ایف آئی آر نمبر ۶۰۰۔ سوزیزہ ۱۲/۲/۲۰۲۰۔ زیر لیا نکہ ۳۰/۳۰۲ و ۳۰۲/۳۰۲۔ انتظامیہ۔ بر خلاف ملاحظہ
 ہسٹری کروایا۔ جسکے بعد قواعد میں پیش آنے والے محرکات کے مطابق سے شران از تمام اکہ بریں نے بد اخلاقت کر کے آشکار کیا جس
 دل اکہلیٹ نے اپنی نامزدگی ناچار فریق دوم مسیان۔ زیر علی۔ محمد علی۔ محمد علی۔ محمد علی۔ محمد علی۔
 داری کے اظہار کا اعادہ کیا۔ جس میں فریق اول اکہلیٹ نے بذریعہ تصدیق ہذا اپنی دگر داری سے طعنے ہوتے ہوئے راضی نامہ کرنا
 عدالت ہائے قانون و انصاف زیرین نا اعلیٰ فریق دوم کو ضمانت پر رہا کر کے بری کر کے تو فریق اول کو کوئی عذر یا انتہا رضی نہ ہوگا۔ راضی
 باقیین بہرہ برائے شران ذیل دیکھنے سے اندازہ ہوتا کہ بوقت ضرورت کام آئے۔

المنصب
 وزارت داخلہ
 محمد عبدالملک
 17301 1850 733 7

المنصب
 ناصبہ برائے وزارت داخلہ
 محمد عبدالملک
 17301 1850 733 7

المنصب
 وزیر شیروار
 محمد عبدالملک
 Nil 17301 99

المنصب

المنصب

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المنصب

17301 12506 259

17301 6489

محمد عبدالملک
 17301-16339 58-1

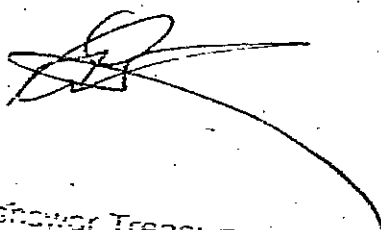
محمد عبدالملک
 17301 16339 367 9

ATTESTED

محمد عبدالملک
 17301 16339 367 9
 NOTARY PUBLIC

Handwritten text in Urdu script, including the number 15 and the number 9.

13 SEP 1998
PESHAWAR



Peshawar Treasury
Licence No 23/1998
Date 21-9-1998
Akhter gul Shahzad

34



8

CHARGE SHEET

I, Superintendent of Police, Headquarters, Capital City Police Peshawar, as a competent authority, hereby, charge that Constable Zar Ali No.616-T of Capital City Police Peshawar with the following irregularities.


"That you Constable Zar Ali No.616-T while posted at Police Lines, Peshawar were absent from duty w.e.f. 16.07.2016 till date without taking permission or leave. This amounts to gross misconduct on your part and is against the discipline of the force."

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.


SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

عنوان: اپیل بھارتیہ حکم مسلمہ 78-74 ف

P.A

موسم کا 28 جنوری 2016
Health

Dy: No. 368 PA-CCPO
Dt: 28.6.2016
Encl:

عالی

No 225- LB
11-7-2016

یہ اپیل بھارتیہ حکم کا ریمونڈ ہے۔
جس میں حکم سے علیحدگی کا حکم داری ہو جائے
اپیل کے ذیل وجوہات ہیں۔

بھارتیہ حکم سے علیحدگی
کا حکم داری ہو جائے

1) یہ کہ وہ 23-16 کو بعد اختتام ڈیوٹی میں اپنی پرائیویٹ کار
میں گئے جاتے تھے۔

2) قلم کا حصہ کے ریمونڈ میں ایک ایسی موٹر کار میں سوار
استعمال نے میرا تعاقب شروع کیا۔

3) یہ کہ مجھے ہتھیاروں کی حدود میں کار / گاڑی کو ٹھہرنے کا
اشارہ یا۔ میں اشارہ کی سڑک سے کرتے ہوئے
گھسار۔ قوف کی بنیاد پر نکلنا چاہئے۔ تو انہوں نے
مجھ پر تین گولیوں کی بارش کی۔ جبکہ تین میں سے تین زخات
میں کہ تھوڑے دس ان میں سے تین۔ میں نے بھی گولی
مانیٹرنگ کی جو وہ استعمال میں تھا کہ

DSP-L
For Comments

2

for

4) راہ گیر نے مجھے اٹھا کر ہسپتال LRIH لے گیا۔ وہاں سے
میں نے منظر میں ملنے والے سرکاری داری کے خلاف
مقدمہ 432

25-16 کو 324/34/1427
میں رجسٹر ہو چکا ہے

5) میں LRH میں ریدم لگے۔ اوتار ٹنڈا آئے اور
مجھے دیکھنے کے لیے چلے گئے۔

6) میرا خیال تھا کہ میں غیہ خائنین میں مگر حکمہ
کے اظہار کے لیے مجھے اسی روز سے غیہ خائفہ کر دیا۔ حالانکہ

7) مجھے غلطی ہوئی کہ میں ہاکم علی کی جگہ سے اور نہ تاجی پیر کا رکی
نیا ہر دو قواست پرانے میں لکھ لیا اور ان کے
دے کے۔ میں یہ سمجھتا تھا کہ اور ان صاحبان مجھے

دیکھنے کے لیے یہاں آئے۔ تو شاید وہ میرا اس طرح
لگا کر دیا اور مجھے غیہ خائفہ نہ کریں۔ دراصل میں
میں خائنین تھا۔ بلکہ عدیم جیانی کرانے تھا۔

8) میں ابتداء میں جو بیانا تحریر کر دیتے ہیں وہ بھی
درست لکھ نہیں لے گئے۔ حالانکہ وہ صحیح اور درست

9) میرے پاس میں لکھ لیا جس میں جو
اس کے ساتھ منسلک کر لے ہوں جو کہ قابل
عورتیں

10) نا سمجھی اور لاعلمی کی بنا پر میں میں لکھ لیا
سایہ پیش نہ کر سکا۔ مگر بعد کے جوابات میں
ذکر کر چکا ہوں ہنگو زیر عورتیں لایا گیا

11) میں ایک ریب جوان الغرض سے اس کی اسٹیج ڈیوٹی فون سے اسٹیج سے سرانجام دینا پڑتا ہے

12) میرا کس قسم کا کوئی تصور نہیں ہے گناہ میں

سروسنگی جانی کا حکم صادر فرمادیں
میرا ساتھ میرے خاندان والوں کی زندگیوں
کھی والہ ہے۔ جنکی خدمت کرتا میرا اولین فرض

استدعا ہے کہ میرے حالات کو مدد رکھے سرانجام
منظور ہے میرے خاندان کا حکم صادر
فرمادیں

28.6.16 مورخ

755
سرسنگی جانی کا حکم صادر فرمادیں

0315-9664483
0312-3258099

☆

38

**CAPITAL CITY POLICE OFFICER,
PESHAWAR**

Phone No. 091-9210989

Fax No. 091-9212597

ORDER

This order will dispose off departmental appeal preferred by ex- Driver constable Zakria Alam No. 700/1151 who was awarded the major punishment of **Dismissal** from service under Police Rules-1975 by SSP/Traffic Peshawar vide his No. 674-78/PA dated 28.6.2016.

2- Shri Alam, the appellant, on 23.4.2016 appellant while posted at Traffic Unit Peshawar was deputed for 2nd shift night duty from 1200 to 06:00 hours. He parked his car at pick up at Traffic Lines and proceeded to home on his own will without seeking permission of his seniors. As such appellant was marked absent vide Daily Diary No.10 dated 23.4.2016 by shift duty incharge (SI Bahader Shah). On the way to home when reached to the place of occurrence i.e near Dost Mohammad Putwari Home signalled to stop by unknown accused. He did not stop. As a result the accused fired at him due to which he was injured on various parts of the body. He was taken to hospital for treatment and a criminal case vide FIR No. 423 dated 23.4.2016 u/s 324/34/427 PPC was registered at PS Badhber on his complaint. He remained absent from lawful duty w.e.f 23.4.2016 to 10.2.2016 (Total- 110 days)

3- Proper departmental proceedings were initiated against him and Mr. Habib Ullah, SP-HQRs: Traffic was appointed as the E.O. The E.O mentioned in his report that the defaulting official was on 2nd shift Night duty from 1200 to 0600 hrs intentionally and deliberately absented himself from duty at 04:20 hrs and while on way to home in his private car was fired at by unknown accused who was medically treated in LRH Peshawar. FIR No. 423 dated 23.4.2016 u/s 324/34/427 PPC PS Badhber was registered on the complaint of accused official clearly shows that at 04:45 hrs which is the time of occurrence he was not available on duty. The E.O found him guilty of the allegations levelled against him and recommended him for award of suitable punishment. On receipt of the findings of the E.O, the SSP-Traffic Peshawar issued him FSCN to which he replied. The same was perused and found unsatisfactory, hence the Competent Authority awarded him the above major punishment.

4- The appellant was called on through local Police of PS Badhber for O.R on 7.9.2016. However, the local Police reported that appellant Zakria Alam has been murdered in a blood feud enmity vide case FIF No. 848 dated 12.8.2016 u/s 302/324/34 PS Badhber. So cannot be heard in O.R. However, it is worth to clarify that the Competent Authority before passing punishment order of dismissal had provided full opportunity of hearing to him in person and self defense as is evident from para-4 of the punishment order. Therefore, material available on record speaks that the appellant had failed to produce justification in self defense. The undersigned feel no interference in the punishment and order passed by the SSP-Traffic Peshawar is up-held and appeal is rejected/filed.


(MULLA AHMAD TAHIR) PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 1773-79 /PA dated Peshawar the 19 / 10 /2016.

Copies for Information and n/a to the:-

1. SSP-Traffic, Peshawar.
2. SP/HQRs: Peshawar.
3. PO/IASI/ CRC along with his S.Roll for making necessary entry in S.Roll.
4. FMC along with FM
5. Official concerned.



حکومت خیبر پختونخوا پاکستان

THE GOVT OF KHYBER PAKHTUNKHWA PAKISTAN

وفات سرٹیفکیٹ

DEATH CERTIFICATE



P06960460

CRMS No D173052-17-0059
NATURE OF DEATH DEADBODY FOUND

FORM No P006960460

1730115172205

12-8-2016 12-8-2016 15-4-1991

1730115172205 1730137897781

APPLICANT NAME NOOR SAHIB
 APPLICANT CNIC 1730115172205 RELATION WITH DECEASED Son
 ADDRESS SURIZAI BALA SHATO KHEL
 CITY PESHAWAR, TEHSIL PESHAWAR, DISTRICT PESHAWAR

DECEASED NAME CNIC	FATHER NAME CNIC	DATE OF BIRTH	SEX	RELIGION	PLACE/DATE OF DEATH	DATE OF BURIAL	REASON OF DEATH	SICKNESS PERIOD
ZIKRIA ALAM 1730137897781	NOOR SAHIB 1730115172205	15-4-1991	MALE	ISLAM	HOME 12-8-2016	12-8-2016	UN- NATURAL	

BLOOD RELATION PERSON CAUSING DISPOSAL OF BODY

NAME NOOR SAHIB CNIC 1730115172205

GRAVE YARD NAME ANTHONY BABA

ENTRY DATE 13-11-2017

ISSUE DATE 14-11-2017

ADDITIONAL INFORMATION

SECRETARY
 Union Council No.52
 Surizai Bala Peshawar

www.dailyanj.com.pk

شماره 106

بیتاریخ

16 جولائی 2016ء

18 جولائی 2016ء

1437ھ

106

مہنگی زرنگی ٹریڈنگ پولیسر ایلمنٹری اسکول میں شہر مدینہ خدی

مہنگی زرنگی ٹریڈنگ پولیسر ایلمنٹری اسکول میں شہر مدینہ خدی کی طرف سے ایک کارروائی کی گئی۔ اس دوران پولیسر ایلمنٹری اسکول کے پرنسپل اور اساتذہ کیساتھ گفتگو کی گئی۔ اس موقع پر پولیسر ایلمنٹری اسکول کے پرنسپل نے کہا کہ اسکول میں شہر مدینہ خدی کی طرف سے ایک کارروائی کی گئی۔ اس دوران پولیسر ایلمنٹری اسکول کے پرنسپل اور اساتذہ کیساتھ گفتگو کی گئی۔ اس موقع پر پولیسر ایلمنٹری اسکول کے پرنسپل نے کہا کہ اسکول میں شہر مدینہ خدی کی طرف سے ایک کارروائی کی گئی۔

تلاش جاری

پولیسر ایلمنٹری اسکول میں شہر مدینہ خدی کی طرف سے ایک کارروائی کی گئی۔ اس دوران پولیسر ایلمنٹری اسکول کے پرنسپل اور اساتذہ کیساتھ گفتگو کی گئی۔ اس موقع پر پولیسر ایلمنٹری اسکول کے پرنسپل نے کہا کہ اسکول میں شہر مدینہ خدی کی طرف سے ایک کارروائی کی گئی۔ اس دوران پولیسر ایلمنٹری اسکول کے پرنسپل اور اساتذہ کیساتھ گفتگو کی گئی۔ اس موقع پر پولیسر ایلمنٹری اسکول کے پرنسپل نے کہا کہ اسکول میں شہر مدینہ خدی کی طرف سے ایک کارروائی کی گئی۔

OFFICE OF THE SUPERINTENDENT OF POLICE HQS, CCP PESHAWAR

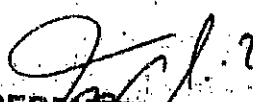
No. 183 /PA

Dt: 21/19/2016

SHOW CAUSE NOTICE

(Under Rule 5(3) KPK, Police rules 1975)

1. That you Constable Zar Ali No.616-T while posted at Police Lines have rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct:
"You were absented yourself from duty w.e.f 16.07.2016 till date without taking permission or leave."
2. That by reason of above, as sufficient material is placed before the undersigned, therefore is decided to proceed against you in general police proceeding without aid of enquiry officer;
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That you retention in the police force will amount to encourage in efficient and unbecoming of good police officer;
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action you by awarding one or more of the kind punishments as provided in the rules.
6. You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
7. You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.


SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

42

FINAL SHOW CAUSE NOTICE

I Superintendent of Police, Headquarters, Police Peshawar, as competent authority, under the provisions of Police Disciplinary Rules 1975 do hereby serve Constable Zar Ali No.616-T the final show cause notice.

City
Police
Office
you,

The Enquiry Officer, SDPO Faqirabad, after completion of departmental proceedings, has recommended you for major punishment for you Constable Zar Ali No.616-T as the charges/allegations leveled against you in the charge sheet/statement of allegations.

And whereas, the undersigned is satisfied that you Constable Zar Ali No.616-T deserve the punishment in the light of the above said enquiry reports.

I, competent authority, have decided to impose upon you the penalty of minor/major punishment under Police Disciplinary Rules 1975.

1. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
2. If no reply to this notice is received within 7 days of its receipt, in normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

[Signature]
SUPERINTENDENT OF POLICE,
HEADQUARTERS, PESHAWAR

No. 230/2 /PA, SP/HQrs: dated Peshawar the 21-11 /2016.

Copy to official concerned

656
SP
[Handwritten notes and signatures]
SRO
26-11-2016

No. 59

10/10/16

63

DISCIPLINARY ACTION

I, Superintendent of Police, Headquarters, Capital City Police Peshawar as a competent authority, am of the opinion that Constable Zar Ali No.616-T has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975

STATEMENT OF ALLEGATION

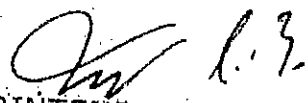
"That Constable Zar Ali No.616-T while posted at Police Lines, Peshawar absented himself from duty w.e.f 16.07.2016 till date without taking permission or leave. This amounts to gross misconduct on his part and is against the discipline of the force."

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and SDPO Faqir abad is appointed as Enquiry Officer.

2. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 30 days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.
3. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.

PA

Call Constable.


SUPERINTENDENT OF POLICE,
HEADQUARTERS, PESHAWAR

No. 230 /E/PA, dated Peshawar the 06/10 /2016

1. SDPO Faqir abad is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official concerned

49

Inquiry Report

Please refer to your office diary No.230 dated 06/10/2016.

Departmental enquiry against Constable Zar Ali No.616-T posted at police line Peshawar been initiated, on the basis of mentioned allegation as under. On the allegation he was sheeted and summary of allegations was handed over by the Superintendent of Police Headquarter, Peshawar. Undersigned was appointed as enquiry officer.

Allegation:

Constable Zar Ali No. 616-T absented himself from duty with effect from 16.7.2016 till to date.

Procedure

Constable Zar Ali No. 616-T has been called vide letter No.6121 dated 01.11.2016 and through line Roznamcha by official phone but the alleged constable did not attend this office to record statement or to produce genuine reasons for his absence.


Findings are appended.

During inquiry it revealed that:

- (a) Alleged constable Zar Ali No.616-T posted at police lines Peshawar has been called vide letter No.6121 dated 01.11.2016 and through line Roznamcha by official phone but he did not attend this office.
- (b) Its mean that the alleged constable has no genuine reason for his absence.

Recommendation


Keeping in view the above circumstances it reveals that the constable is not interested in his official job. His continued absence is gross misconduct for uniformed official. Therefore he is recommended major punishment.


 (Muhammad Tariq Khan Dawar) PPM, UNPM
 Deputy Superintendent of police
 Faqirabad Circle Peshawar

17/11/2016

SP Headquarter, Peshawar.
 No. 59 /st
 dated 17/11 /2016

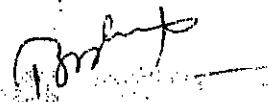
*Issue Final
show cause notice*


 21/11/16

Kindly with reference to your good remarks passed on the note sheet of under-signed relating to the departmental appeal of ex-constable Zar Ali No.616/T to the effect that "so what's the legal position on point-A? We are confronted with this question every day therefore it is better to understand the legal position. Please consult law and judgments of Superior Courts and submit your opinion".

With respect to clarification of point "A" it is stated that as per dictum laid down in various judgments of Superior court as well as Service Tribunal Khyber Pakhtunkhwa, criminal proceedings in criminal courts and departmental proceedings are two different entities and may run parallel to each other, even acquittal from criminal charges by criminal courts, having no effect on departmental proceedings.

Secondly so far as this appeal is concerned, the accused official was charge sheeted for absence and subsequently he was awarded punishment for absence and not for involvement in criminal cases. He was under legal obligation to have informed the department about his involvement in criminal case and surrender himself to the authorities but he failed to do so and absconded. As per Superior court judgment fugitive from law losses his legal right "2017 SCMR 965" so under the law acquittal from criminal cases cannot entitle him for reinstatement.



DSP/Legal
Peshawar.

Comments on Departmental Appeal

Sir,

Departmental Appeal filed by Ex-Constable Zar Ali No. 616-T before the Worthy CCPO Peshawar for re-instatement into service received to this office for comments, gone through which reveals that appellant was dealt with departmentally on the charge of deliberate absence from duty with effect from 16.07.2016 till date.

Enquiry was entrusted to SDPO Faqirabad with the direction to scrutinize his role with reference to allegations framed against the appellant. The enquiry officer during the course of enquiry numbers of time called the appellant to join the enquiry proceedings and submit plausible grounds in his defence but to no avail. As such the enquiry officer concluded enquiry and recommended him for major punishment being not interested in his official job.

After receipt of findings of enquiry officer the competent authority issued him final show cause notice which was delivered to him at his home address and was served upon the Nazim of his Union Consil, but he failed to submit his written reply within stipulated period. Therefore, he was awarded the major punishment of Dismissal from service vide OB No. 52 dated 04.01.2017 by the competent authority.

Perusal of record reveals that the competent authority before imposing the major punishment had completed codal formalities and an ample opportunity of self defence was provided, but appellant being not interest in his official duty remained continously absent from lawful duty. More so the appellant in his appeal has also admitted that he was charged in 02 murder cases, wherein he was granted bail by court on the basis of compromise. Punishment order passed by the competent authority is in accordance with law. The appeal also hits by time limitation.


DSP/Legal,
CCP, Peshawar.

4.10.18

Name/No	Home Address	Date of Enlist:	Entries				Charges	E O Name/ Recom:	Punishment	Plea of the applicant	Remarks Opinion of DSP/Legal	Order by the CCPO
			Good	Bad	Min	Major						
Ex-Constable Zar Ali No. 616/T	Surizai Peshawar	31.07.2009	Nil	01	01	01	He while posted at Police Lines Peshawar absented himself from his lawful duty w.e.f 16.07.2016 till his dismissal i.e 04.01.2017. Total absence 05 months and 18 days. Later on he was also charged in two separate criminal cases and granted bail by the court on the basis of compromise.	Muhammad Tahir Khan Dawar DSP/F-Abad	Dismissed from service. (PR 1975) By SP/HQr: (Waseem Ahmad Khalil) Vide OB No.52 Dt: 04.01.2017 (Appeal time bared for 01 year and 08 Months)	* Request to set-aside the punishment	Perusal of the record reveals that competent authority before imposing the major punishment had completed codal formalities and ample opportunity of self defence was provided, but appellant being not interested in his official duty remained continuously absent from lawful duty. More so the appellant in his appeal has also admitted that he was charged on 02 murder cases, wherein he was granted bail by the court on the basis of compromise. Punishment order passed by the competent authority is in accordance with law. The appeal also hits by time limitation.	
		Total Qlfy service 07 Years, 05 Months & 01 Day										
		Date of birth 08.04.1986										
		Education 10 th										
		Courses Recruit										
			Bad:-	Minor:	Major:							
			01	01	Nil							

whats the legal position? On limitation?

*To the CCPO Police Officer
Peshawar*

DSP/C

SPK

PK

57

48

Name/No	Home Address	Date of Enlist:	Entries				Charges	E O Name/ Recom:	Punishment	Plea of the applicant	Remarks/ Opinion of DSP/Legal
			Good	Bad	Min	Maj					
Ex-Constable Zar Ali No: 616/T	Surizai Peshawar	31.07.2009	Nil	01	01	01	He while posted at Police Lines Peshawar absented himself from his lawful duty w.e.f 16.07.2016 till his dismissal i.e 04.01.2017. Total absence 05 months and 18 days. <i>Later on he was also charged in two separate criminal cases and granted bail by the court on the basis of compromise.</i>	Muhammad Tahir Khan Dawar DSP/F-Abad	Dismissed from service. (PR 1975) By SP/HQr: (Waseem Ahmad Khalil) Vide OB No.52 Dt: 04.01.2017 (Appeal time bared for 01 year and 08 Months)	* Request to set-aside the punishment	Perusal of the record reveals that competent authority before imposing the major punishment had completed codal formalities and ample opportunity of self defence was provided, but appellant being not interested in his official duty remained continuously absent from lawful duty. More so the appellant in his appeal has also admitted that he was charged on 02 murder cases, wherein he was granted bail by the court on the basis of compromise. Punishment order passed by the competent authority is in accordance with law. The appeal also hits by time limitation.
		Total Qlfy service									
		07 Years, 05 Months & 01 Day									
		Date of birth									
		08.04.1986									
		Education									
		10 th									
Courses											
Recruit											
			Bad:-	Minor:	Major:						
			01	01	Nil						

whats the legal position? On limitation?

Capital City Police Officer
Peshawar

Signature

DSP/C

PA

49

REFERENCE ATTACHED

This is a formal departmental enquiry against **Constable Zar Ali No.616-T** on the allegations/charges that he while posted at Police Lines, Peshawar was absent from lawful duty w.e.f ~~16.07.2016 till date~~ without taking permission or leave.

In this regard, he was issued charge sheet & summary of allegations. SDPO Faqirabad conducted the enquiry proceedings & submitted his report that defaulter official did not attend the enquiry proceedings. The E.O further recommended major punishment for defaulter official vide at F/A.

Upon the finding of E.O, he was issued final show cause notice & delivered him on home address through local Police PS Badaber which received by Fazal Rabi Nazim U/C 153 Aba Khel Surizai Bala Badaber but he failed to appear before this office or submitted explanation as yet **vide at F/B.**

~~Submitted for further orders please~~

SP HOrs

PA S/o
process the case
Bader
SP/HQ
21/12/17

P.A.
20/12/16

MM / 2 Julo

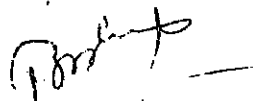
56

Sir,

Kindly with reference to your good remarks passed on the note sheet of under-signed relating to the departmental appeal of ex-constable Zar Ali No.616/T to the effect that **"so what's the legal position on point-A? We are confronted with this question every day therefore it is better to understand the legal position. Please consult law and judgments of Superior Courts and submit your opinion"**.

With respect to clarification of point "A" it is stated that as per dictum laid down in various judgments of Superior court as well as Service Tribunal Khyber Pakhtunkhwa, criminal proceedings in criminal courts and departmental proceedings are two different entities and may run parallel to each other, even acquittal from criminal charges by criminal courts, having no effect on departmental proceedings.

Secondly, so far as this appeal is concerned, the accused official was charge sheeted for absence and subsequently he was awarded punishment for absence and not for involvement in criminal cases. He was under legal obligation to have informed the department about his involvement in criminal case and surrender himself to the authorities but he failed to do so and absconded. As per Superior court judgment fugitive from law losses his legal right "2017 SCMR 965" so under the law acquittal from criminal cases cannot entitle him for reinstatement.



DSP/Legal
Peshawar.

57

Name of Official

ZAR ALI No.616/T S/O NOOR SAHIB

R/O Shatu khel Surizai Bala PS Badaber Distt: Peshawar

Date of Birth 08.04.1986

3. Date of enlistment 31.07.2009

4. Education 10th

5. Courses Passed Recruit

6. Total qualifying service 07 year, 05 months & 01 day.

7. Good Entries Nil

8. Punishment (previous)

Bad Entries (L.W.O Pay, E/Drill & Warning)

1. 03 days leave without pay vide OB No.3160 dt: 16.10.2014

Minor Punishment

1. Censured vide OB No.3600 dt: 24.11.2014

Major Punishment

Nil

09. Punishment (Current)

- Awarded major punishment of dismissed from service on the charges of absence w.e.f 16.07.2016 to till date. Hence, the period he remained absent from 16.07.2016 to till date is treated without pay vide OB No.52 dt: 04.01.2017 by SP/HQrs.

10. Leave Account

Total leave at his credit

356 days

Availed leaves

Nil

Balance

356 Days

BA *[Signature]*

[Signature]
CRC
11-10-18

W/CCPO

52

Name of Official

ZAR ALI No.616/T S/O NOOR SAHIB

R/O Shatu khel Surizai Bala PS Badaber Distt: Peshawar

2. Date of Birth 08.04.1986
3. Date of enlistment 31.07.2009
4. Education 10th
5. Courses Passed Recruit
6. Total qualifying service 07 year, 05 months & 01 day.
7. Good Entries Nil
8. Punishment (previous)
Bad Entries (L.W.O Pay, E/Drill & Warning)

1. 03 days leave without pay vide OB No.3160 dt: 16.10.2014

Minor Punishment

1. Censured vide OB No:3600 dt: 24.11.2014

Major Punishment

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10. Leave Account

<u>Total leave at his credit</u>	<u>Availed leaves</u>	<u>Balance</u>
356 days	Nil	356 Days

PA *[Signature]* 11/10

[Signature]
CRC
11-10-18

W/CCPO

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2913/2
23-8-16
22.08.2016

R.HQs No. 539
Date 23/8/16

فہرست ڈسٹرکٹ ملازمان تنخواہ بندش

نمبر شمار	نام انمبر	مدات	نمبر شمار	نام انمبر	مدات
1	عدنان زریب 1710	مد 15 روز نامی 27-10-2015	23	خالد 2177	مد 22 روز نامی 08-06-2016
2	امداد 37	مد 21 روز نامی 25-07-2016	24	رضاء اللہ 982	مد 41 روز نامی 24-06-2016
3	میرداد 253/EXM	مد 05 روز نامی 19-05-2016	25	محمد رحیم 5440	مد 09 روز نامی 10-06-2016
4	فرقان علی 219	مد 16 روز نامی 31-07-2016	26	شیر اکبر 5955	مد 25 روز نامی 07-08-2016
5	احتشام 1528/SPO	مد 24 روز نامی 18-07-2016	27	محمد آیاز 3522	مد 19 روز نامی 23-07-2016
6	شاہ فیصل 984/SPO	مد 07 روز نامی 12-07-2016	28	ظہور خان 305	مد 63 روز نامی 28-05-2016
7	فرمان 1066/SPO	مد 07 روز نامی 12-07-2016	29	محمد ارشاد 5961	مد 23 روز نامی 25-05-2016
8	جہانگیر 520/SPO	مد 07 روز نامی 12-07-2016	30	ارشاد خان 3783	مد 14 روز نامی 09-09-2015
9	مبارک شاہ 08	مد 55 روز نامی 25-07-2016	31	اجیر خان 5454	مد 62 روز نامی 11-06-2015
10	نعیم 4803	مد 26 روز نامی 07-12-2015	32	عمران کلاس نور	مد 66 روز نامی 02-11-2015
11	آفتاب 4991	مد 07 روز نامی 24-06-2016	33	ذاکر 1435/SPO	مد 25 روز نامی 07-08-2016
12	شرافت 5374	مد 07 روز نامی 24-06-2016	34	امیر شاہ 154/SPO	مد 22 روز نامی 06-08-2016
13	زویں 616/T	مد 21 روز نامی 16-07-2016	35	فیصل 795/SPO	مد 73 روز نامی 30-06-2016
14	زیارت 2868	مد 24 روز نامی 17-08-2016	36	فرحت اللہ 1462	مد 15 روز نامی 21-03-2016
15	نادر خان 5615	مد 11 روز نامی 08-08-2016	37	وقاص 1912	مد 54 روز نامی 13-07-2016
16	ارشاد علی 1928	مد 24 روز نامی 17-08-2016	38	شیر علی 1659	مد 11 روز نامی 14-08-2016
17	سلیمان 3862	مد 03 روز نامی 15-08-2016	39	حلت باری 5340	مد 07 روز نامی 18-08-2016
18	نعیم 2277	مد 06 روز نامی 12-08-2016	40	فدا حسین 3384	مد 11 روز نامی 19-06-2016
19	ستار خان 5027	مد 09 روز نامی 12-08-2016	41	سین جان 1193	مد 58 روز نامی 15-07-2016
20	عبدالباہ 5938	مد 05 روز نامی 11-08-2016	42	حبیب شاہ 2257	مد 21 روز نامی 27-07-2016
21	حامد 1291	مد 42 روز نامی 05-08-2016	43	جواد 3652	مد 16 روز نامی 31-07-2016
22	فیصل 2131	مد 05 روز نامی 11-08-2016	44	نعیم 2660	مد 23 روز نامی 17-08-2016

R.HQs No. 539
Date 23/8/16

جناب عالی

فہرست ڈسٹرکٹ ملازمان جو کہ بدستور غیر حاضر ہے۔
تنخواہ بندش کی سفارش کی جاتی ہے۔

PA/OAS
Pay stopped till further orders also issue scall

O.B No. 8991
Date 23-8-16

Supd. Police
HQs: OAS
24/8/16

Sir,
Forwarded PD

Forwarded M




23/8/16

Forwarded PL

23/8/16

Ri
23-8-16

23-8-16

50 روپے	391			
ایڈوکیٹ: Shaukat Ali		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: BC-10-9392				
رابطہ نمبر: 0300 5971017				

بعدالت جناب: سر جسٹر ایجوکیشنل کورٹ کراچی

مخانب: سائل	دعویٰ: اپیل
زعمی	علت نمبر:
بنام	مورخہ:
آئی جی سید ظہیر ظہیر خواہ و سہیلہ	جرم:
	تھانہ:

باعت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام لندن کیلئے شہادت علی احمد درج الفضا اور وکیل کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت 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 اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخل منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ ہر حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رجب
 المرقوم: 2/1/19

الع بد گواہ شد الع بد
 مقام کراچی کے لیے منظور ہے۔

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.**

Service Appeal No.16/2019.

Zar Ali Ex-Constable No. 616-T Peshawar.....Appellant.

VERSUS.

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.
3. Superintendent of Police HQrs., Peshawar.
4. Superintendent of Police Rural, Peshawar...
- 5- SDPO/Hayatabad Circle PeshawarRespondents.

Reply on behalf of Respondents No. 1, 2, 3, 4&5.

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS.

1. That the appeal is badly time barred.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has not come to this Tribunal with clean hands.
4. That the appellant has no cause of action.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from Honorable Tribunal.
7. That the appellant has got no locus standi and cause of action to file the instant appeal.

FACTS:-

- 1- Para No.1 is totally incorrect. The record of the appellant is not up to the mark. The appellant along with his brother namely Fakhar-E-Alam were charged in criminal cases vide FIR No. 54 dated. 02.02.2017 u/s 302/324/34-PPC PS East Cantt: and FIR No. 846 dated. 12.08.2017 u/s 302/324/34 PPC PS Badhber. The brother of the appellant namely Fakhar Alam has already been dismissed from service vide OB No.3531 dated 28.09.2017.
- 2- Para pertains to record, hence needs no comments.
- 3- Para No.3 is incorrect. In fact the appellant was absented himself from his lawful duty, later on he was also involved in two criminal cases vide FIR No. 54 dated. 02.02.2017 u/s 302/324/34-PPC PS East Cantt: and FIR No. 846 dated. 12.08.2017 u/s 302/324/34 PPC PS Badhber.
- 4- Para No.4 is incorrect. In fact the appellant while posted at Police Lines, Peshawar was absented himself from his lawful duty w.e.f 16.07.2016 till the date of dismissal from service without taking leave/permission. In this regard, he was issued charge sheet and statement of allegation. SDPO/Faqirabad was appointed as Enquiry Officer. The enquiry officer summoned him time to time, but the

appellant did not bother to attend the enquiry proceedings. Upon the finding of enquiry officer, he was issued final show cause notice and delivered him on home address through local police PS Badhber, which was received by Fazal Rabbi Nazim u/s 153 Aba Khel Surizai Bala Badaber, but the appellant failed to submit his reply. After fulfilling all the codal formalities he was awarded major punishment of dismissal from service.

- 5- Para No.5 is incorrect. The appellant was charge sheeted for absence and subsequently he was awarded punishment for absence and not for involvement in criminal cases, after fulfilling all the codal formalities he was awarded major punishment. The charges leveled against him were proved.
- 6- Para No.6 is incorrect. The appellant filed departmental appeal which after due consideration was filed/rejected on the ground that his appeal was badly time barred for about 01 year and 08 months.
- 7- That appeal of the appellant being devoid of merits may kindly be dismissed of following grounds:

GROUND:-

- A- Incorrect. The punishment order passed by the competent authority as per law/rules and liable to be upheld.
- B- Incorrect. The competent authority before imposing the major punishment had completed codal formalities and an ample opportunity of self defence was provided, but appellant being not interested in his official duty remained continuously absented from lawful duty.
- C- Incorrect. The appellant in his departmental appeal admitted that he was charged in 02 Murder cases, and was gone into hiding and reportedly declared as P.O in the said Murder cases. Wherein he was granted bail by court on the basis of compromise. The appellant was awarded punishment for absence not for the involvement in criminal cases. The appellant under legal obligation to have informed the department about his involvement in criminal cases and surrender himself to the authority, but he failed to do so and absconded.
- D- Incorrect. The appellant was not honorably acquitted rather he was acquitted on the basis of compromise. As per superior court judgment fugitive from law losses his legal right.
- E- Incorrect. The appellant being a member of a disciplined force committed gross misconduct. The appellant was dismissed from service under police and disciplinary Rules 1975.

F- Incorrect. The appellant was properly associated with the enquiry proceedings and all codal formalities were fulfilled.

G- Incorrect. The appellant was absented himself from his lawful duty, and later on he was also involved in 02 Murder Cases. The appellant after the commission of offence remained fugitive from law and was absconder for long period and he after effecting compromise, got acquittal from court. So under the law acquittal from criminal cases cannot entitle him for reinstatements.

H- That respondent may also be allowed to advance any additional ground at the time of hearing of the appeal.

PRAYERS:-

In view of the above, and keeping in view the gravity of slackness, willful negligence and misconduct of appellant, it is prayed that his appeal being devoid of any legal force may kindly be dismissed.



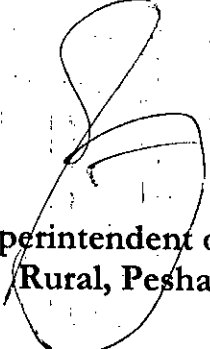
**Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.**



**Capital City Police Officer,
Peshawar.**



**Superintendent of Police,
HQrs, Peshawar.**



**Superintendent of Police
Rural, Peshawar.**



**SDPO/Hayatabad
Circle, Peshawar.**

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.**

Service Appeal No.16/2019.

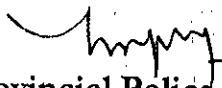
Zar Ali Ex-Constable No. 616-T Peshawar.....Appellant.


VERSUS.

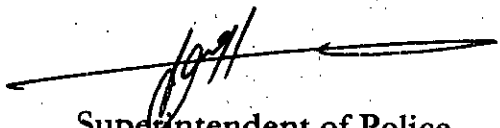
1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
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4. Superintendent of Police Rural, Peshawar...
- 5- SDPO/Hayatabad Circle PeshawarRespondents.


AFFIDAVIT

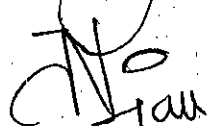
We respondents No. 1 ,2,3,4 & 5 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.


Capital City Police Officer,
Peshawar.


Superintendent of Police,
HQrs, Peshawar.


Superintendent of Police
Rural, Peshawar.


SDPO/Hayatabad
Circle, Peshawar.