S.A No. 6617/2021

24.03.2023

Junior of learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present and submitted copy of inquiry report consisting of 46 sheets, which are placed on file. Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 05.06.2023 before the D.B.

Parcha Peshi given to the parties.



(Muhammad Akbar Khan) Member (E) (Salah-ud-Din) Member (J) 28.09.2022

Appellant present in person. Naseer Ud Din Shah, learned Assistant Advocate General alongwith Wagar Ahmad, PASI for respondents present.

Former requested for adjournment as his counsel is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 29.11.2022 before D.B

(Farcena Paul) Member (E)

(Rozina Rehman) Member (J)

29.11.2022 Due to such of work. This case has been deleted. To come up for the same as before on 16.02.2023. Reader.

16th Feb, 2023

Appellant alongwith his counsel present. Mr. Umair Azam Khan, Additional Advocate General alongwith Mr. Zafran-ud-Din, ASI for the respondents present.



Complete inquiry record has neither been submitted by the appellant nor by the respondents, therefore, representative of the respondents shall positively produce the same on the next date and to come up for arguments on 24.03.2023 before the D.B.

(Salah-ud-Din)

Member (3)



(Kalim Arshad Khan) Chairman

24.05.2022

Appellant in person present. Mr. Kabirullah Khattak, learned Addl. AG for the respondents present.

Written reply/comments on behalf of respondents has already been submitted through office which is placed on file. Copy of the same is handed over to the appellant. To come up for rejoinder if any, and arguments on 21.07.2022 before **D**.B.

(Mian Muhammad) Member (E)

21.07.2022

Counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Waqar Ahmad PASI for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 28.09.2022 before D.B.

(Fareeha Paul) Member(E)

(Rozina Rehman) Member (J)

16.08.2021

Appellant Deposited ocess Fea

Counsel or the appellant present. Preliminary arguments head

Points raised need consideration. The appeal is admitted to full hearing, subject to all just and legal objections including that of limitation to be determined during the course full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the writter reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of noncompliance. File to come up for arguments on 17.12.2021 before the D.B.

17.12.2021

Appellant alongwith his learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Written reply/comments on behalf of the respondents not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 03.03.2022 before S.B.

3-3.2022 One to verireacents Chairman the case is O-me up for the come us

(MIAN MUHAMMAD)

approved

: Lefor

The How

FORM OF ORDER SHEET

S.No.

1

1-

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Form-A

Court of 15 Case No 2021 Date of order Order or other proceedings with signature of judge proceedings 3 2 The appeal of Mr. Rehman Ullah resubmitted today by Syed Roman 28/06/2021 Shah Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAF This case is entrusted to S. Bench for preliminary hearing to be put up there on 1608/21 RMAN

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.....

The appeal of Mr. Rehmanullah No. 597/LHC CDR Section DPO Kohat received today i.e. on 17.0642021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Law under which appeal is filed is not mentioned.
- 2- Copy of revision petition mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

No. 1040 /S.T. Dt. 18/06 /2021

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Syed Roman Shah Adv.Pesh.

Objections complied with . Put up for further m/a + order please. Copy of The rensea petition is gliached at Page NO. 23(1) to 23(V1).

shall "

BEFORE THE HONOURABLE JUDGE SERVIC TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

661-/2021 Appeal No

Rehman Ullah

S.#

(Appellant)

VERSUS

INDEX

The District Police Officer & others

(Respondents)

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? Appellant Kehn Mar Through

> Shahid Qayum Khattak Advocate Supreme Court

Syed Roman Shah Advocate High Court

Dated: 15.06.2021

BEFORE THE HONOURABLE JUDGE SERVIC TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Received (1) total Sally

Appeal No.[°]_____/2021

Rehman Ullah No. 597/LHC, CDR Section DPO Office, Kohat.

(Appellant)

VERSUS.

1. The District Police Officer, Karak.

2. The Region Police Officer, Kohat Region.

3. Inspector General of Police, KP Peshawar.

(Respondents)

Under Section 04 07 Services Tribunal Act APPEAL AGAINST ORDER OF THE REGION OFFICER, KOHAT POLICE REGION NO.6891/EC, DATED 25.06.2020 WHEREBY MAJOR PUNISHMENT OF REDUCTION TO "TIME SCALE" FOR PERIOD OF THREE (03) YEARS AWARDED BY THE DISTRICT POLICE OFFICER, KARAK TO THE APPELLANT VIDE ORDER BEARING NO. 517 DATED 29/11/2019 HAS BEEN REDUCED TO TWO YEARS AND THE ORDER OF INSPECTOR GENERAL OF POLICE DATED: 29.04.2021 BEARING NO. 1684 WHEREBY MAJOR PUNISHMENT OF REDUCTION TO TIME SCALE HAS BEEN REDUCED FOR A PERIOD OF ONE (01) YEAR.

PRAYER:

On acceptance of the instant appeal, order of the District Police Officer, Karak dated 29/11/2019 as well as Order dated 25.06.2020 passed by Region Police Officer, Kohat Region and order dated: 29.04.2021 of Inspector General of Police may please be set aside and the charge sheet No. 426-27/PA(Enq), dated 12.11.2019 issued to the appellant/official, contained in the Statement Allegations of No. 545/Hqrs: Dated 25/11/2019 may graciously be annulled and the appellant/official may please be exonerated from the charge leveled against him.

Respectfully Sheweth;

FACTS:

Short, but relevant facts giving rise to the instant appeal are that an FIR No. 538 dated 22.10.2019 U/s 302 PPC Police Station Latamber was initially registered against unknown accused and the appellant/official being in-charge of DSB, Karak was the member of the constituted J.I.T meant for tracing out the actual culprits and the appellant/official while putting in his best efforts succeeded to rightly name Mst. Farah Naz to be the actual murderer. However, the daughter of accused Mst. Farah Naz namely Mst. Sidrat-ul-Muntaha moved an application to the respondent No. 2 against the appellant/official, blaming him for enticing her away for sexual intercourse upon which an inquiry was initiated vide charge sheet No.426-27/PA(Enq), Dated 12.11.2019 (annexure) "A") and ultimately vide Order of the District Police Officer, Karak bearing OB No. 517 dated 29.11.2019 (annexure "B") major punishment of reduction to "Time Scale" for period of three (03) years was imposed appellant/official with immediate effect. upon the The appellant/official being aggrieved of the above-mentioned order preferred departmental appeal (annexure "C") before the respondent No. 2, which was though dismissed, but the quantum of punishment awarded to the appellant/official was reduced to two years vide Order No. 6891/EC, Dated Kohat the 25.06.2020 "D"). Feeling aggrieved from the order dated: (annexure 25.06.2020 from respondent No. 2 the appellant has preferred an Appeal to this Honorable Tribunal and a revision petition to the worthy Inspector General of Police whereby the time scale has been reduced to one year through order dated: 29.04.2021 (Annexure "E").

That as the new order has been passed, therefore the said new order has to be challenged separately, therefore in the interest of justice the appellant through an application withdrew the previous appeal before this Honorable Tribunal Court.

The appellant/official being aggrieved of the above order submits the instant appeal on the following grounds:-

GROUNDS:

That the appellant/official since his induction has always tried to bring fame and to avoid the department from being painted with any stigmas. That the appellant has been trained all the way in the service for tracing out the men behind the guns.

2.

3.

4.

That the impugned order dated 29.11.2019is running shot of the actual and factual facts as the case FIR No. 538 dated 22.10.2019 U/s 302 PPC Police Station Latamber was initially registered against unknown accused and the appellant/official being in-charge of DSB, Karak was the member of the constituted J.I.T meant for tracing out the actual culprits and the appellant/official while putting in his best efforts succeeded to rightly name Mst. Farah Naz to be the actual murderer. The gist of the inquiry proceedings is clearly supports the implied tactics of the appellant for tackling the matter in the right way; that after the arrest of accused Mst. Farah . Naz, the weapon of offence was yet to be recovered, therefore, he was playing his best cards through contacts with the daughter of accused to recover the weapon of offence and his act was not aimed for having any illicit relation with the daughter of Farah Naz (accused in the case), namely Mst. Sidrat-ul-Muntaha.

That the alleged relations with the daughter of accused, named above, if really considered, was a

meager reward at the cost of the rendered services of the appellant. $\hat{}$

- 5. the enquiry proceedings That which have culminated in the major punishment of reduction "Time Scale" three to for years upon appellant/official is the result of conspiracy for showing down the appellant/official in the ranks of the department as the appellant/official, being in-charge of DSB, Karak as well as member of J.I.T was competent in tracing out the unknown culprits of the case.
- 6. That appellant was implicated in departmental charges on the basis of fabricated charges planted by female accused arrested in murder case. Again the involvement of the accused in the blind murder case was traced with the efforts initiated by appellant. The award of punishment to appellant on the basis of hallowed charges leveled by the daughter of accused will discourage the police officers in taking action against the accused.
- 7. That the allegations against the appellant/official had no sound footings, otherwise, it would not have been refused by the S.P Investigation, Karak to proceed with it himself.

That the enquiry proceedings are based on the proceedings carried out by the then Enquiry Officer/SDPO, Banda Daud Shah which were objected to by the appellant/official for posing no confidence in the real and truthful search of the facts.

the

enquiry

That the appellant/official has not been given the of cross-examination of right witnesses who have boxed in against him.

8.

9.

10. That none of the witnesses have admitted for seeing the appellant with their naked eyes for being in contact with the complainant/Sidrat-ul-Muntaha at the time as stated by the complainant.

That the mobile recovered by the appellant/official 11. from Sidrat-ul-Muntaha/complainant have been taken vide recovery memo of the case mentioned above, therefore, no question of contacts with Sidrat-ul-Muntaha arises hereinafter of the recovery of the mobiles, therefore, the allegation of handing over the mobile phones back to complainant/Sidrat-ul-Muntaha is groundless and without proof.

That CDR of the mobile phone of the appellant has 12. not been made part of the enquiry proceedings.

 That the inquiry officer has not recommended/suggested any punishment against the appellant/official.

14.

That the punishment awarded to the appellant/official is contradictory to the facts rather manipulated and fabricated, hence not tenable.

15. That no final Show Cause Notice was issued to the appellant/official. Copy of the findings of Enquiry Officer was also not supplied to the appellant/official before passing the impugned orders, therefore, in view of the procedure and legal lapses on the part of lower authority, the impugned orders are not sustainable.

16. That the enquiry proceedings are running full of legal shortcomings and lacunas, therefore, the impugned orders bears no effect and be considered null and void.

17. That the appellant authority vide the impugned order has held that the punishment order passed by the DPO, Karak appears to be harsh as compared to allegation, but instead to set aside the punishment, it was just reduced from three years' time-scale to two years, therefore, the impugned order is not sustainable. 18. That the impugned order of Inspector General of Police bearing No. S/1684/2021 dated: Peshawar the 26.04.2021 is also appears to be harsh and as well as against the facts and circumstances, hence this appeal.

19.

- That the appellant has been penalized twice for the same offence i.e. first by reduction of time scale for period of three years and secondly by issuance of transfer order of the appellant to District Hangu vide Order No. 269-70/EC, dated Kohat the 03.01.2020, hence the impugned orders are liable to be set aside.
- 20. That if the impugned orders are let to have its effect then in that case the service of the appellant will remain dented, painted and stigmatized, therefore, the impugned order repugnant with certain drawbacks be reversed.
- 21. That the appellant/official has been awarded two Commendation Certificates-II for his good performance in case FIR NO. 129 dated 27.03.2019 u/s 324/353/399/400/401/34 PPC r/w section 15 AA of PS Yaqoob Khan Shaheed (Karak) from the office of your good-self as well as Commendation Certificate-III and case reward of Rs: 3000/- from the office of the District Kohat Police for his good performance during duty, but

the good performance and unblemished record of service of the appellant/official was not taken into account before passing the impugned order.
22. That the appellant/official wishes to be heard in person for the narration of the facts articulately.

Therefore, it is most humbly prayed that, on acceptance of the instant appeal, impugned order dated: 29.04.2021 passed by the Inspector General of Police and impugned order dated 25.06.2020 passed by the Region Police Officer, Kohat Region may please be annulled and consequently order of the District Police Officer, Karak dated 29/11/2019 may please also be set aside and the charge sheet No. 426-27/PA(Enq), dated 12.11.2019 issued to the appellant/official, contained in the Statement of Allegations No. 545/Hqrs: Dated 25/11/2019 may graciously be withdrawn and the appellant/official may please be exonerated from the charge leveled against him.

Dated: 15.06.2021

Kehn Hotaly.

Appellant

Through

Shahid Qayum Khattak Advocate Supreme Court

Syed Róman Shah Advocate High Court

BEFORE THE HONOURABLE JUDGE SERVIC TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Appeal No. _____/2021 .

Rehman Ullah

(Appellant)

VERSUS

The District Police Officer & others

(Respondents)

AFFIDAVIT

I, **Rehman Ullah** No. 597/LHC, CDR Section DPO Office, Kohat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

CNIC: 1420 Cell: <u>03</u>

Identified by

Shahid Qayum Khattak Advocate Supreme Court Of Pakistan.

BEFORE THE HONOURABLE JUDGE SERVIC TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

CM No. ____/2021

In

Appeal No. ____/2021

Rehman Ullah

(Appellant)

The District Police Officer & others , (Respondents)

VERSUS

APPLICATION FOR CONDONATION OF DELAY IN FILING THE INSTANT APPEAL.

Respectfully Sheweth:

- 1. That the accompanying appeal is being filed before this Honourable Tribunal, which is yet to be fixed for its hearing.
- 2. That the order has been announced on dated 29.04.2021 and the copy of the same order has not been delivered to the applicant/ appellant.
- 3. That the copy of the order has been delivered to the applicant/ appellant on dated 14.06.2021, hence this application for condonation of delay.
- 4. That the delay in filing the appeal is neither intentional nor willful, but due to aforesaid reasons.
- 5. That valuable rights of the applicant/appellant are involved, therefore, it is just, fair as well as in the larger

interest of justice that the delay in filing the appeal be condoned.

It is, therefore, prayed that by accepting this application, the delay in filing the instant appeal may please be condoned in the best interest of justice.

Dated: 15.06.2021

Keh ott

Through Applicant/ Appellant

Shahid Qayum Khattak Advocate Supreme Court

&.

Syed Roman Shah Advocate High Court

> **D E P O N** Pog - 5958

CNIC: 1420

Cell: 0333-97/0

AFFIDAVIT

I, Rehman Ullah No. 597/LHC, CDR Section DPO Office, Kohat, do hereby solemnly affirm and declare on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

BEFORE THE HONOURABLE JUDGE SERVIC TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Appeal No. ____/2021

Rehman Ullah

(Appellant)

VERSUS

The District Police Officer & others (Respondents)

ADDRESSES OF THE PARTIES

<u>APPELLANT:</u>

Rehman Ullah No. 597/LHC, CDR Section DPO Office, Kohat.

<u>RESPONDENTS:</u>

- 1. The District Police Officer, Karak.
- 2. The Region Police Officer, Kohat Region.
- 3. Inspector General of Police, KP Peshawar.

Appellant Through

Shahid Qayum Khattak Advocate Supreme Court

8.

Syed Roman Shah Advocate High Court

Dated: 15.06.2021

CHARGE SHEET

C

I. NAUSHER KHAN, District Police Officer, Karsk as a competent authority, horoby chargo you LHC Rohman Ullah No. 598 J/C DSB Karak follow:-

Dated

"As per Dally Diary Report No. 17 dated 10.11.2019 that accused Mst: Farah Naz r/o district Bannur presently confined in the Central Jail Karek in offence of murder. You LHC: Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reason who is medical?attendant of her mother at KDA hospital Karak. Wherein immoral conversion was recorded in her mobile, in which you LHC Rehman Ullah No. 598 entice her for your undesirable needs as per mobile recording. This is quite adverse on your part and shows your indiscipline attitude in the discharge of official obligations. This act on your part is against service discipline and amounts to gross misconduct."

1. This act on your part Is against the service discipline and amounts to gross misconduct. By the reason of your commission/omission, constitute miss-conduct under Police disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhlunkhwa, Police Department, you have rendered your-self liable to all or any of the penalties, specified in Police Rule-1975 ibid.

2. You are, therefore, required to submit your written defense within 07-days of the receipt of this charge sheet to the enquiry Officer is hereby appointed for the purpose of conducting enquiry.

Your written defense if any should reach to the Enquiry Officer within a stipulated period, failing which shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

Intimate whether you desire to be heard in person. A statement of allegation is enclosed,

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3.

4.

District Police Officer, Karak

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Ammediate

/PA(Enq)

My this Order will dispose off the departmental enquity against LHC Rehman Ullah No. 598 of this district Police.

⁶ CFacts are that as per Daily Diary Report No. 17 dated 10.11.2019 that accused Mst: Farah Naz r/o district Bannu presently confined in the Central Jail Karak in offence of murder. LHC Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reason who is medical attendant of her mother at KDA hospital Karak. Wherein immoral conversion was recorded in her mobile, in which LHCIRehman Ullah No. 598 entice her for his undesirable needs. This is quite adverse on his part and shows his indiscipline attitude in the discharge of official obligations."

He was issued with Charge Sheet and Statement of allegations. Initially, Mr. Muhammad Ashraf SDPO B.D.Shah was appointed as an Enquiry Officer. Meanwhile, accused official submitted an application requesting therein that he has no confidance over the Enquiry Officer. His request was accepted and the said enquiry was marked to Mr. Amjid Ali SDPO Karak to conduct proper departmental enquiry against him and to submit his findings within the stipulated time.

The Enquiry Officer reported that perusal of relevant record and adopting all legal and procedural formalities as well as listening the audio call recording between defaulter official and Mst: Sidra Tul Munteha, the allegations leveled against defaulter official LHC Rehman Ullah No. 598 are hereby proved.

Keeping in view of the available record and facts on file, perusal of enquiry papers and commendations of the Enquiry Officer, he is found guilty of the charges, his this act is against service discipline and shows his contaminated mindset and indiscipline attitude in the discharge of his official obligations being a member of discipline Force although the defaulter official at initial stage performed important role in tracing the accused in case FIR No. 538 dated 22,10,2019 u/s 302 PPC PS Latamber but later on he deviated from his lawful obligations. He enticed stranger women for undesirable needs, therefore, in exercise of power conferred upon me, I, NAUSHER KHAN, District Police Officer, Karak is hereby imposed a major punishment of reduction to "Time Scale" for period of three (03) years upon the defaulter LHC Rehman Ullah No. 598 with immediate effect.

OB No. Dated

/2019

<u>ORDER</u>

District Police Officer, Karak

Amescure-e

BEFORE HONOURABLE THE DEPUTY INSPECTOR GENERAL OF POLICE, KOHAT REGION KOHAT

Departmental Appeal against Order of the District Police Officer, Karak bearing OB No. 517 dated 29/11/2019 whereby major punishment of reduction to "Time Scale" for period of three (03) years has been imposed upon LHC Rehman Ullah No. 598 (the appellant/official) with immediate effect.

PRAYER:

On acceptance of the instant departmental appeal, order of the District Police Officer, Karak dated 29/11/2019 may please be set aside and the charge sheet No. 426-27/PA(Enq), dated 12.11.2019 issued to the appellant/official, contained in the Statement of Allegations No. 545/Hqrs: Dated 25/11/2019 may graciously be annulled and the appellant/official may please be exonerated from the charge leveled against him.

Through: Proper Channel.

Respected Sir,

• The appellant/official submits the instant departmental appeal to catch your sympathetic and compassionate attention on the following grounds.

GROUNDS:

- 1. That the appellant/official since his induction has always tried to bring fame and to avoid the department from being painted with any stigmas.
- 2. That the appellant has been trained all the way in the service for tracing out the men behind the guns.

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3. That the impugned order dated 29.11.2019 is running shot of the actual and factual facts as the case FIR No. 538 dated 22.10.2019
U/s 302 PPC Police Station Latamber was initially registered against unknown accused and the appellant/official being in-charge of DSB, Karak was the member of the constituted J.I.T meant for tracing out the actual culprits and the appellant/official while putting in his best efforts succeeded to rightly name Mst. Farah Naz to be the actual murderer. The gist of the inquiry proceedings is clearly supports the implied tactics of the appellant for tackling the matter in the right way; that after the arrest of accused Mst. Farah Naz, the weapon of offence was yet to be recovered, therefore, he was playing his best cards through contacts with the daughter of accused to recover the weapon of offence and his act was not aimed for having any illicit relation with the daughter of Farah Naz (accused in the case), namely Mst. Sidrat-ul-Muntaha.

4. That the alleged relations with the daughter of accused, named above, if really considered, was a meagre reward at the cost of the rendered services of the appellant.

5. That the enquiry proceedings which have culminated in the major punishment of reduction to "Time Scale" for three years upon appellant/official is the result of conspiracy for showing down the appellant/official in the ranks of the department as the appellant/official, being in-charge of DSB, Karak as well as member

of J.I.T was competent in tracing out the unknown culprits of the case.

Paer

- 6. That appellant was implicated in departmental charges on the basis of fabricated charges planted by female accused arrested in murder case. Again the involvement of the accused in the blind murder case was traced with the efforts initiated by appellant. The award of punishment to appellant on the basis of hallowed charges leveled by the daughter of accused will discourage the police officers in taking action against the accused,
- 7. That the allegations against the appellant/official had no sound footings, otherwise, it would not have been refused by the S.P Investigation, Karak to proceec with it himself.
- 8. That the enquiry proceedings are based on the proceedings carried out by the then Enquiry Officer/SDPO, Banda Daud Shah which were objected to by the appellant/official for posing no confidence in the real and truthful search of the facts.
- 9. That the appellant/official has not been given the right of crossexamination of the enquiry witnesses who have boxed in against him.
- 10. That none of the witnesses have admitted for seeing the appellant with their naked eyes for being in contact with the complainant/Sidrat-ul-Muntaha at the time as stated by the complainant.

- 11. That the mobile recovered by the appellant/official from Sidrat-ul-Muntaha/complainant have been taken vide recovery memo of the case mentioned above, therefore, no question of contacts with Sidrat-ul-Muntaha arises hereinafter of the recovery of the mobiles, therefore, the allegation of handing over the mobile phones back to complainant/Sidrat-ul-Mantaha is groundless and without proof.
- 12. That CDR of the mobile phone of the appellant has not been made part of the enquiry proceedings.
- 13.That the inquiry officer has not recommended/suggested any punishment against the appellant/official.
- 14. That the punishment awarded to the appellant/official is contradictory to the facts rather manipulated and fabricated, hence not tenable.
- 15.That no final Show Cause Notice was issued to the appellant/official. Copy of the findings of Enquiry Officer was also not supplied to the appellant/official before passing the impugned order, therefore, in view of the procedure and legal lapses on the part of lower authority, the impugned order is not sustainable.
- 16. That the enquiry proceedings are running full of legal shortcomings and lacunas, therefore, the impugned order bears no effect and be considered null and void.

17. That if the impugned order is let to have its effect then in that case the service of the appellant will remain dented, painted and

stigmatized, therefore, the impugned order repugnant with certain drawbacks be reversed.

18. That the appellant/official has been awarded two Commendation Certificates-II for his good performance in case FIR NO. 129 dated 27.03.2019 u/s 324/353/399/400/401/34 PPC r/w section 15 AA of PS Yaqoob Khan Shaheed (Karak) from the office of your good-self as well as Commendation Certificate-III and case reward of Rs: 3000/- from the office of the District Kohat Police for his good performance during duty, but the good performance and unblemished record of service of the appellant/official was not taken into account before passing the impugned order.

19.That the appellant/official wishes to be heard in person for the narration of the facts articulately.

It is, therefore, most humbly prayed that, on acceptance of the instant departmental appeal, impugned order of the District Police Officer, Karak dated 29/11/2019 may please be set aside and the charge sheet No. 426-27/PA(Enq), dated 12.11.2019 issued to the appellant/official, contained in the Statement of Allegations No. 545/Hqrs: Dated 25/11/2019 may graciously be annulled and the appellant/official may please be exonerated from the charge leveled against him. Dated: 10/12/2019

(Appellant/Official) LHC Rehman Ullah No. 598 Police Lines, Karak.

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POLICE DEPTT:

KOHAT REGION

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ORDER.

This order will dispose of a departmental appeal, moved by TUC Reliftian Ullah No. 17 of Operation Staff Karak against the punishment order. passed by DPO/Karak vide OB No. 517, dated 29.11.2019 whereby he was awarded punishment of three years time-scale on the allegations of developing illicit immoral relations with one Sidrat-ul-Muntaha d/o accused Mst: Farah Naz involved in a criminal case.

"He preferred an appeal to the undersigned, upon which comments were obtained from DPO Karak and his service record perused. He was also heard in person in Orderly Room, held in this office on 25.06.2020. During hearing, the appellant did not advance plausible explanation to prove his innocence.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the same has also been established from audio recording saved in phone memory of Sidrat-ul-Muntaha. However, the punishment order passed by DPO Karak appears to be harsh as compared to allegations. Therefore, three years time-scale punishment awarded to the appellant is hereby reduced to two years.

Order Announced 25-06-2020

(TAYYAB HAFEEZ) PGR Begion Police Officer. anat Region.

No. <u>E.S.</u> /EC, dated Kohat the 61 /2020.

Copy for information and necessary action to the District Police Officer. Karak w/r to his office Memo: No. 246/EC, dated 08.01/2020, His Service Roll & Fauji Missal is returned herewith.

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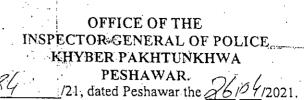
Region Police Officer.

2020

A (TAYYAB HAFEEZ) PS

Kohn Region.

1/2/2 Amesure-E مرزق جس معام فو الحوالا آبار الكرين طرك Utrici à Juis, 1, qui sel ,6650 100 de milo Cr66 00, ?. ~; J Č. 2=215 1 John SBien 598 mile Fim 032e Sir Farmaded Allowed bict Police Officer OASi/ PSOto 200 KK (Karak) Recieved Photo Copy Kahattak. 598 ~ 1 2 UIC 14/06/2021



<u>ORDER</u>

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by LHC Rehman Ullah No. 597. The above named official was awarded punishment of reduction to time scale for period of three years by District Police Officer, Karak vide OB No. 517, dated 29.11.2019 on the allegations that accused Mst: Farah Naz r/o district Bannu presently confined in the Central Jail Karak in offence of murder. The petitioner contacted her daughter namely Mst: Sidra for unknown reason who is medical attendant of her mother at KDA hospital Karak. Wherein immoral conversation was recorded in her mobile, in which the petitioner entice her for his undesirable needs. The Appellate Authority i.e. Regional Police Officer, Kohat has reduced his punishment of three years time-scale to two years vide order Endst: No. 6891/EC, dated 06.07.2020.

Meeting of Appellate Board was held on 11.03.2021 wherein petitioner was heard in person. Petitioner contended that he being Incharge DSB Karak traced out the blind case and arrested Mst: Farah Naz. After her arrest, the weapon of offence was yet to be recovered, therefore he contacted her daughter.

The petitioner has long service of 13 years, 08 months & 10 days at his credit. Keeping in view his long service, the Board decided that his penalty of reduction to time scale for period of two years is hereby reduced to reduction to time scale for one year.

Sd/-KASHIF ALAM, PSP Additional Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.

) <u>cecivec</u>

No. S/ 1625-90/21.

Copy of the above is forwarded to the:

- Regional Police Officer, Kohat. One Service Roll and one Fauji Missal of the above named LHC Rehman Ullah No. 597 received vide your office Memo: No. 11963/EC, dated 30.09.2020 is returned herewith for your office record.
- 2. District Police Officer, Karak.
- 3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
- 4. AIG/Legal, Kinyber Pakhtunkhwa, Peshawar.
- 5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
- 6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
- 7. Office Supdt: E-IV CPO Peshawar.

クチ ULLAH KHAN) PSP AIG/Establishment, For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar. ale

BEFORE HONOURABLE THE INSPECTOR GENERAL OF POLICE, KHYBER PAKHTUNKHWA, PESHAWAR

(23-1)

Page | 1

APPEAL AGAINST ORDER OF THE REGION POLICE OFFICER, KOHAT REGION NO. 6891/EC, DATED KOHAT THE 25.06.2020 WHEREBY MAJOR PUNISHMENT OF REDUCTION TO "TIME SCALE" FOR PERIOD OF THREE (03) YEARS AWARDED BY THE DISTRICT POLICE OFFICER, KARAK TO THE APPELLANT VIDE ORDER BEARING OB NO. 517 DATED 29/11/2019 HAS BEEN REDUCED TO TWO YEARS.

PRAYER;

On acceptance of the instant appeal, order of the District Police Officer, Karak dated 29/11/2019 and Order dated 25.06.2020 passed by Region Police Officer, Kohat Region may please be set aside and the charge sheet No. 426-27/PA(Enq), dated 12.11.2019 issued to the appellant/official, contained in the Statement of Allegations No. 545/Hqrs: Dated 25/11/2019 may graciously be annulled and the appellant/official may please be exonerated from the charge leveled against him.

Through: Proper Channel.

Respected Sir,

The appellant/official submits the instant appeal to catch your sympathetic and compassionate attention on the following grounds.

GROUNDS:

- 1. That the appellant/official since his induction has always tried to bring fame and to avoid the department from being painted with any stigmas.
 - 2. That the appellant has been trained all the way in the service for tracing out the men behind the guns.

3. That the impugned order dated 29.11.2019 is running shot of the actual and factual facts as the case FIR No. 538 dated 22.10.2019 U/s 302 PPC Police Station Latamber was initially registered against unknown accused and the appellant/official being in-charge of . DSB, Karak was the member of the constituted J.I.T meant for tracing out the actual culprits and the appellant/official while putting in his best efforts succeeded to rightly name Mst. Farah Naz to be the *actual murderer. The gist of the inquiry proceedings is clearly supports the implied tactics of the appellant for tackling the matter in the right way; that after the arrest of accused Mst. Farah Naz, the weapon of offence was yet to be recovered, therefore, he was playing his best cards through contacts with the daughter of accused to recover the weapon of offence and his act was not aimed for having any illicit relation with the daughter of Farah Naz (accused in the case), namely Mst. Sidratzul-Muntaha

(23 - 11)

4. That the alleged relations with the daughter of accused, named above, if really considered, was a meagre reward at the cost of the rendered services of the appellant.

5. That the enquiry proceedings which have culminated in the major punishment of reduction to "Time Scale" for three years upon appellant/official is the result of conspiracy for showing down the appellant/official in the ranks of the department as the appellant/official,

Page 3

being in-charge of DSB, Karak as well as member of J.I.T was competent in tracing out the unknown culprits of the case.

23-11

- 6: That appellant was implicated in departmental charges on the basis of fabricated charges planted by female accused arrested in murder case. Again the involvement of the accused in the blind murder case was traced with the efforts initiated by appellant. The award of punishment to appellant on the basis of hallowed charges leveled by the daughter of accused will discourage the police officers in taking action against the accused.
- 7. That the allegations against the appellant/official had no sound footings, otherwise, it would not have been refused by the S.P Investigation, Karak to proceed with it himself.
- 8. That the enquiry proceedings are based on the proceedings carried out by the then Enquiry Officer/SDPO, Banda Daud Shah which were objected to by the appellant/official for posing no confidence in the real and truthful search of the facts,
- 9. That the appellant/official has not been given the right of cross-examination of the enquiry witnesses who have boxed in against him.
- 10. That none of the witnesses have admitted for seeing the appellant with their naked eyes for being in contact with the complainant/Sidrat-ul-Muntaha at the time as stated by the complainant.

That the mobile recovered by the appellant/official from Sidrat-ul-Muntaha/complainant have been taken vide recovery memo of the case mentioned. above, therefore, no question of contacts with Sidnatul-Muntaha arises hereinafter of the recovery of the mobiles, therefore, the allegation of handing over the mobile phones back to complainant/Sidrat-ul-Mantaha is groundless and without proof. 12. That CDR of the mobile phone of the appellant has not been made part of the enquiry proceedings: 13. That the inquiry officer hasi not Fecommended/suggested any punishment against the appellant/official-

23-11

14. That the punishment awarded to the appellant/official is contradictory to the facts rather manipulated and fabricated, hence not tenable.
15. That no final Show Cause Notice was issued to the appellant/official. Copy of the findings of Enquiry Officer was also not supplied to the appellant/official before passing the impugned order, therefore, in view

of the procedure and legal lapses on the part of lower authority, the impugned order is not sustainable. 16. That the enquiry proceedings are running full of - A 10412

legal shortcomings and lacunas, therefore; the impugned order bears no effect and be considered null and void.

17. That the appellant authority vide the impugned order has held that the punishment order passed by

21. That the appellant/official wishes to be heard in person for the parration of the facts articulately.

Therefore, it is most humbly prayed that, on acceptance of the instant appeal, impugned order dated 25.06.2020 passed by the Region Police Officer, Kohat Region may please be annulled and consequently order of the District Police Officer, Karak dated 29/11/2019 may please also be set aside and the charge sheet No. 426-27/PA(Enq), dated 12.11.2019 issued to the appellant/official, contained in the Statement of Allegations No. 545/Hqrs: Dated 25/11/2019 may graciously be withdrawn and the appellant/official may please be exonerated from the charge leveled against him. Dated: 29/07/2020

(Appellant/Official)

LHC Rehman Ullah No. 597 CDR Section DPO Office, Kohat. 0333-9714838

FINDING

Kindly refer to Charge Sheet No426-27/PA(Enq), dated 12.11.2019, issued to LHC Rehman Ullah No. 598 I/C DSB Karak:-

No. 545 /Hars:

Dated. 25-11- /2019

ALLEGATIONS:

"As per daily diary report No. 17, dated 10.11.2019 that accused Mst: Farah Naz r/o district Bannu presently confined in the Central Jail Karak in offence of murder. LHC Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reasons who is medical attendant of her mother at KDA hospital **>** Karak wherein immoral conversion was recorded in her mobile in which LHC Rehman Ullah No. 598 did entice her for illicit relations.

Initially, the departmental enquiry entrusted to SP Investigation, Karak who due to huge burden of official works did excuse from conducting the enquiry proceedings and the same marked to SDPO Banda Daud Shah who recorded the statements of Mst. Sidratul Muntah d/o Ghulam Mustafa r/o district Bannu and IHC Zahid Asghar incharge guard MLC KDA Hospital. During the enquiry proceedings, the defaulter official, LHC Rehman Ullah preferred an application that he has no hope of fair and transparent enquiry proceedings from SDPO Banda Duad Shah hence requested for changing of enquiry officer. The competent authority entrusted the enquiry to the undersigned.

According to the statement of Sidratul Muntah d/o Ghulam Mustaf recoded to SDPO Banda Duad Shah that her mother was arrested in the case FIR No. 538, dated 22.10.2019, u/s 302 PPC PS Latamber and was under treatment in KDA hospital Karak and she was there for her mother help, LHC Rehman Ullah, Incharge DSB Karak frequently made mobile phone calls at her mobile number for illicit relations. She further stated that one day LHC Rehman Ullah alongwith Cestable Zia taken her to unknown place and enticed her sexual intercourse but she denied and pretended.

IHC Zahid Asghar Incharge guard MLC ward KDA hospital in his statement recorded to then (E.O) SDPO Banda Duad Shah that 10.11.2019 at about afternoon, accused Farah Naz mother of Sidrat upMuntah made noise in the ward and complained about unknown person telephonic calls to her daughter Sidratul Muntah for harassment. Incharge guard brought the same issue into the notice of RI Police Lines Karak who visited the spot. RI Police Lines Karak heard

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the telephonic call and recognized him as LHC Rehman Ullah, Incharge DSB

Similarly, the statements of SHO Jamshed Khan and OII Maqsood Khan Latmaber were recorded, placed on enquiry file. Both the officers appreciated the efforts of the defaulter official concerning to the case FIR No. 538/2019 of PS latamber and mentioned in their statements that the case was successfully workout due to his strenuous efforts upon the CDRs. As regard the allegation regarding illicit relation with the daughter of the accused Farah Naza Mst: Sidra tul Muntaha who was attendant with her mother at KDA Hospital Karek, no complaint from the accused was received to them, they added.

Apart from the crux of statements recorded by then E.O SDPO Banda Duad Shah which cannot be altered, the undersigned summoned the following Police officials, heard in person and recorded their statements in order to reach a logical conclusion.

1. Inspector Muhammad Iqbal, RI Police Lines, Karak.

2. LHC Rehaman Ullah (defaulter/accused official)

3. HC Habib Ullah Shah (Incharge Causlity KDA hospital)

14. Constable Amin Gul No. 286

5. Constable Noor Islam No. 374

6. Constable Muhammad Sajid No. 05

7. Constable Uzair Ullah No. 313

8. Constable Arshad Iqbal No. 169

9. Constable Zia ur Rehman No. 385

10. L/Constable Samreen Begum No. 247

All the above Police officer/officials endorsed in their statements that LHC Rehman Ullah, incharge DSB Karak made a telephonic call to Sidratul Muntaha for illicit relations except Constable Uzair Ullah and Arshad Iqbal at Serial No. 7&8 who were on (Shabasi) leave while Constable Zia (accomplice official) repudiated the allegations leveled against LHC Rehman Ullah.

The defaulter official LHC Rehman Ullah confessed in his written statement that he made telephonic call to Sidratul Muntaha, daughter of accused Mst Farah Naz for recovery of some evidences, and SIMs used in the offence through different strategy and tactics.

Apart from the above proceedings, an application submitted before Reserve Inspector Karak by the constable Amin Gul No. 286 wherein the applicant expressed that the defaulter LHC met to him at main gate of the office of undersigned and told him to record his statement in his favour. Application further

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Treveals that the said constable denied to do so and also disclosed that he will record his statement based on facts instead of his favour. The application of the said constable was shown in the daily diary No. 33 dated 15.11.2019 police lines, Karak, placed on file.

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Conclusion. From the perusal of the relevant record and adopting all legal and procedural formalities as well as lestining the audio call recording between the defaulter official and Mst: Sidra tul Muntaha(preserve in the attached USB), the undersigned reached to the conclusion that the allegations leveled against the defaulter LHC Rehman Ullah No. 598 are here by ploved, please.

Dy: Superintendent of Police, Hqrs, Karak

a Jan. 2000 Actions Pa FIRE THE SEA SECTION د URDER. LHC Reason Uliah No. 398 of Operation Statt Katak transferred posted to Operation Staff Hangu with immediate effect. Ś (TAYYAB HAFEEZ) PSP Regional Police Officer. Kohar Region.9 No. 269-70 EC. ented Kohal-the 3 11 2020 Copy for information and necessary action to the: The District Police Officer, Karak The District Police Officer, Hangu (TAYYAB HA'FEEZ) PSP Regional Police Officer. Konat Region K OM 5. 5.34

BETTER COPY

ORDER

LHC Rehman Ullah No.598 of Operation Staff Karak is hereby transferred/posted to Operation Staff Hangu with°immediate effect.

> Sd/-**(TAYYAB HAFEEZ) PSP** Regional Police Officer, Kohat Region

No.269-70/EC, dated Kohat the 3/1/2020

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Copy for information and necessary action to the: The District Police Officer, Karak. The District Police Officer, Hangu.

Sd/-(TAYYAB HAFEEZ) PSP Regional Police Officer, Kohat Region

shall



COMMENDATION CERTIFICATE CLASS-II

Granted by

Resident of Mohallah / Village_____

Police Station______Yaqoob Khan Shaheed____District _____Karak

In recognition of

His good performance vide case FIR No., 129 dated 27.03.2019 U/Ss 324, 353, 399, 401

401/34 PPC, 15 AA Police Station Yaqoob Khan Shaheed

No. <u>1081</u> Dated 27/3/2019

Deputy Inspector General of Police. Kohat Region, Kohat

AREA PAKHTUNKHWA Commendation Certificate **CLASS-II** Granted By Mp. Tayyah Hafeez Cleema 1817 Deputy inspector General of Police, Kohat Region HC Reiman Ullah No. 598 DSB.KK To Son of Resident of Mohallah / Village Police Station DSR District Kanak In recognition of his Good performance in Case FIR No. 313 02.06.2019 4/5 302, 324452, 34 PPC Police Statin Karal Cash Reward R. 2000/ (Two thoward only.) No. 332/CC Dated 17 108/2078 r General ef Police gion, Kohat



, BEFORE THE SERVICE TRIBUNAL KYBER PAKHTUNKHWA, PESHAWAR

Appeal No. 9407/2020

Rehman Ullah

the the Novant VERSUS

The District Police Officer and others

plicant/ Appellant Pak ¢^{ę,} Diary Dale Ce Tribur Respondents.

APPLICATION FOR WITHDRAWAL OF THE ABOVE NOTED APPEAL WITH

- spectfully Sheweth;
 - Applicant / appellant humbly submits as under;
 - 1. That the above noted appeal is pending before this Hon'ble Tribunal and is now fixed for hearing on 29/09/2021.
 - 2. That applicant / appellant filed revision petition before the worthy IGP and now the concerned office informed telephonically applicant that has revision petition has partially been accepted and the penalty of reduction to time scale for revision to the scale for revision to
 - and the penalty of reduction to time scale for period of two years has been reduced to one year.
 3. That the same order has not yet been received to applicant but as the instant appeal of applicant has been admitted to regular hearing on 01/06/2021 and the time of security deposit is running out therefore, applicant prefer this application for withdrawal of the same with permission to file a fresh one.
 - That as new order has been passed therefore, the said order is required to be challenged separately, therefore, in the interest of justice the applicant request for withdrawal of instant appeal with permission to file a fresh one.

It is, therefore, most humbly prayed that by accepting this application applicant/ appellant may please be allowed to withdraw this appeal with permission to file a fresh one.

Through

Applicant / appellant

Rehman Ul Shahid (Court

15.06.2021

Appeal No. 9407/2020 PROMON Appellant in person present and states that on his

revision petition, respondent No. 3 has passed the order dated 26.04.2021, whereby penalty of reduction in time scale for period of two years was reduced to to reduction to time scale for one year. In view of the said development, he submitted an application for withdrawal of instant appeal with permission to file fresh one.

In view of the above, the appeal is dismissed as withdrawn. The appellant is at liberty to file fresh appeal, if so advised subject to all just and legal objections. File be consigned to the record room.

Chairman

akhtunk

ANNOUNCED 15.06.2021

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9407/20 01.06.2021

Counsel for the appellant present. Preliminary arguments heard.

The original order of the imposition of punishment was passed on 29.11.2019 which was challenged through departmental appeal on 10.12.2019 within time. The departmental appeal was decided on 25.06.2020 with relief in reduction of the punishment. The present appeal follows the order of the Appellate Authority. When the departmental appeal has been accepted with partial relief, the original order stood merged in the Appellate order. Although this appeal has been preferred beyond 30 days of the pressing of impugned order but in view of Section 30 of the Khyber Pakhtunkhwa Epidemic Control and Emergency Relief Act, 2020, the limitation period provided under any law shall remain frozen. This appeal having been filed after promulgation of the said Act, is not affected by bar of limitation. Points raised need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/ comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 29.09.2021 before the D.B.



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24.11.2020

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Mr. Shahid Qayum Khatta, Advocate, is present. He submitted application for adjournment that he is busy in election of Bar Council being a candidate. Application is placed on record. Adjournment granted. File to come up for preliminary hearing on 10.02.2021 before S.B.

> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

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10.02.2021

Junior to counsel for appellant present and made a request for adjournment as senior counsel is busy in the Apex Court; granted. To come up for preliminary hearing on 01.06.2021 before S.B.

> (Rozina Rehman) Member (J)

> > 1

ATTESTED i re ro akhtukhwa ice Tribunat Peshawar

Ś نر ا Form- A FORM OF ORDER SHEET Court of :9407 Case No.-_ /2020 S.No. Date of order Order or other proceedings with signature of judge proceedings 1 2 3 The appeal of Mr. Rehman Ullah presented today by Mr. Shahid 1-18/08/2020 Qayum Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please REGISTRAR This case is entrusted to S. Bench for preliminary hearing to be put 2up there on 21/09/3-20 CHAIRMAN Junior to counsel for the appellant present. 21.09.2020 Requests for adjournment as learned counsel is engaged today, before the Courts at Charsadda. Adjourned to 24:11.2020 before S.B. TTESTE Chairmai tukhwa I: h Trity - (e 0.23st

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به تو که او سینر Appelleint 15.2 يزز AUI (F آينام بولر دعوكى 7. باعث تحرم إنكه مقدمه مندرجة عنوان بالامين ابني طرف سيرواسط بيردى دجواب دامي دكل كاردائي متعلقة آن مقام <u>مسیم ور من ممل</u>ع میترا بر قرم محرر روز معاقد آن مقام <u>مسیم اور من مملع میترا بر قرم محرر روز من من مار</u> روز مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کومقلہ میں کا کا کا کا کا اختیار ہوگا۔ نیز د د کمل صاحب کوراضی نامد کرنے وتقرر مثالت و فیصلہ برحلف دیتے جواب دہی اورا قبال دعوی اور بسورت ذكرى كرفي اجراءا ورصولى جيك درويسة ارحرضى دعوى اور درخواست برقتم كي تفررين زراي برد سخط كراف كااختيار موكار نيز صورت عدم بردى يا فركرى يكطرفه يا بيل كى برايد كى ادرمنسوني نیز دائر کرنے اپیل نگرانی دنظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقد مہ مذکور کے پاچروی کاردانی کے داسط اورد کمیل پایختارتا لوٹی کواپنے ہمراہ پااسپنے بجائے تقرر کا اختیار ہوگا۔اور ساحب مقرر شدہ کوہمی وہی جملہ ندکورہ باا فقتیا دامت حاصل ہوں کے اور اس کا ساخت moun ر داختد منظور قبول موگا ... دوران مقدمه ش جوخر چدد مرجانه التواسي مقدمه ا سک سبب سے دموگا .. كونى تاريخ بيتى مقام دوره پر به ديا حدب با مرمونو وكمل صاحب پا بند بول مكم سكر بيروى 80 مدكوركري برابدادكالت نامدكهمديا كمستدرب الرتوم -15 ·20.81 _06 .1 بمقام Atosted E te tet

BEFORE THE HONORABLE, SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No. 6617 / 2021 Rehman Ullah LHC No. 598

Appellant

Respondents

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa & Others

	-	M	
S.NO	DESCRIPTION	ANNEXURE	PAGE
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1.	Para wise comments/reply	· · · · ·	1-3
2.	Report of RI Police Line, Karak	A	4
3.	USB	В	5
4.	Copy of Text Messages	C,D,E,F,G,H	6-11
5.	Order of DIG / P, Kohat		12

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Respondents Through Representative

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 6617/2021 Rehman Ullah LHC No. 598

1

..... Appellant

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa & others

...... Respondents

PARAWISE COMMENTS BY RESPONDENTS.

Respectively Sheweth:-

Preliminary Objections:-

- i. That the appellant has got no cause of action.
- ii. The appellant has got no locus standi to file the instant appeal.
- iii. That the appeal is bad for misjoinder and nonjoinder of necessary parties.
- iv. That the appellant has not approached the honorable Tribunal with clean hands.
- v. That the appellant is estopped to file the instant appeal for his own act.
- vi. That the appeal is badly time barred and liable for dismissal in limine.

Facts:-

1. Correct to the extent that the appellant was posted in the District Security Branch Karak. The appellant had digressed from his official obligations and contacted Sidratul Muntah, the daughter of the under treatment accused Mst: Farah Naz in District Headquarter hospital, Karak charged in case FIR No. 538, dated 22.10.2019 u/s 302 PPC PS Karak for illicit relations. The Reserve Inspector Police Lines, Karak had entered a daily diary report against the appellant and subsequently the appellant was proceeded departmentaly and awarded major punishment of time scale for three years. However, the punishment was modified by the appellate authority keeping in view of his long service. Report of RI Police Lines, Karak as **annexure-A**.

Grounds:-

- 1. Incorrect, the appellant had submitted a baseless diary report against a senior Police officer of CTD Karak for which the appellant was awarded punishment of stoppage of one annual increment vide OB No. 307, dated 10.05.2018.
- 2. Incorrect, no special training acquired by the appellant, he is a normal trained Police official.

- 3. Incorrect, recovery of weapon of offence is the responsibility of Investigation officer not the appellant. The departmental enquiry was conducted according to the law/rules and the appellant badly failed to prove his innocence.
- 4. The appellant had digressed from his official obligation being a member of disciplined force hence awarded punishment.
- 5. Incorrect, no conspiracy on the part of department was found by the enquiry officer nor the appellant advanced any proof to the enquiry officer regarding his innocence and conspiracy against him.
- 6. Incorrect, the appellant was proceeded departmentally in accordance with the rules and sufficient evidential materials/statements of on duties Police officials, report of Reserve Inspector Police Lines, Karak and mostly importantly, the voice record/message sent to Sidratul Muntah, the daughter of accused Farah Naz. Voice message preserved/saved in USB as annexure-B.
- 7. Incorrect, SP investigation, Karak did not refuse from conducting enquiry against the appellant.
- 8. Incorrect, the appellant wanted an enquiry proceedings in accordance with his wishes which was not possible, however, for the end of justice and fair & transparent enquiry proceedings, the enquiry was entrusted to another enquiry officer as per request of the appellant.
- 9. Incorrect, the appellant was given an opportunity of personal hearing defence during probe.
- 10. The appellant's voice message (saved in USB) to the accused daughter namely Sidrat ul Muntah reflects his bad intentions available on the enquiry file.
- 11. Incorrect, there is no proof on the record that the appellant had recovered a mobile phone from Sidrat ul Muntah as she was not an accused person but an attendee of her accused mother in hospital.
- 12. The appellant had sent a text messages to the accused daughter and a snap shots from mobile phone clearly shows the appellant mobile number 0333-9714838 and his intentions are enclosed as **annexure- C,D,E,F,G,H**.
- The responsibility of the enquiry officer is to prove the allegation not the recommendations of punishment as per Police Disciplinary Rules 1975 (Amended 2014).
- 14. Incorrect, rules have been followed while awarding punishment to appellant.
- 15. Incorrect, the appellant was given an opportunity of personal hearing and copy of finding report for his defence but he failed to advance any plausible reply to the competent authority.
- 16. Reply as para-14 above.
- 17. Incorrect, the Respondent No. 02, clearly mentioned in the order vide No. 6891/EC, dated 06.07.2020 that he had gone through the available record

and came to the conclusion that the allegations leveled against the appellant are proved which established his guilt as annexure-I.

- 18. Reply as para No. 17 above.
- 19. Incorrect, the same punishment of appellant was reduced to two and one year respectively by the appellate authority not penalize twice.
- 20. Incorrect, punishment and reward are part and parcel in a disciplined force; hence misconduct of the appellant rendered him to punishment.
- 21. Reply as para-20 above.
- 22. Appellant already heard in person.

Prayer -

In view of the above, it is prayed that the appeal being devoid of merits may graciously be dismissed with costs.

Inspector General of Police, Khyber Pakhturkhwa, Peshawar (Respondent No. 3) District Police Officer arak (Respondent No. 1

Deputy Inspector General of Police,

(Respondent No. 2) DIG POLICE KOHAT

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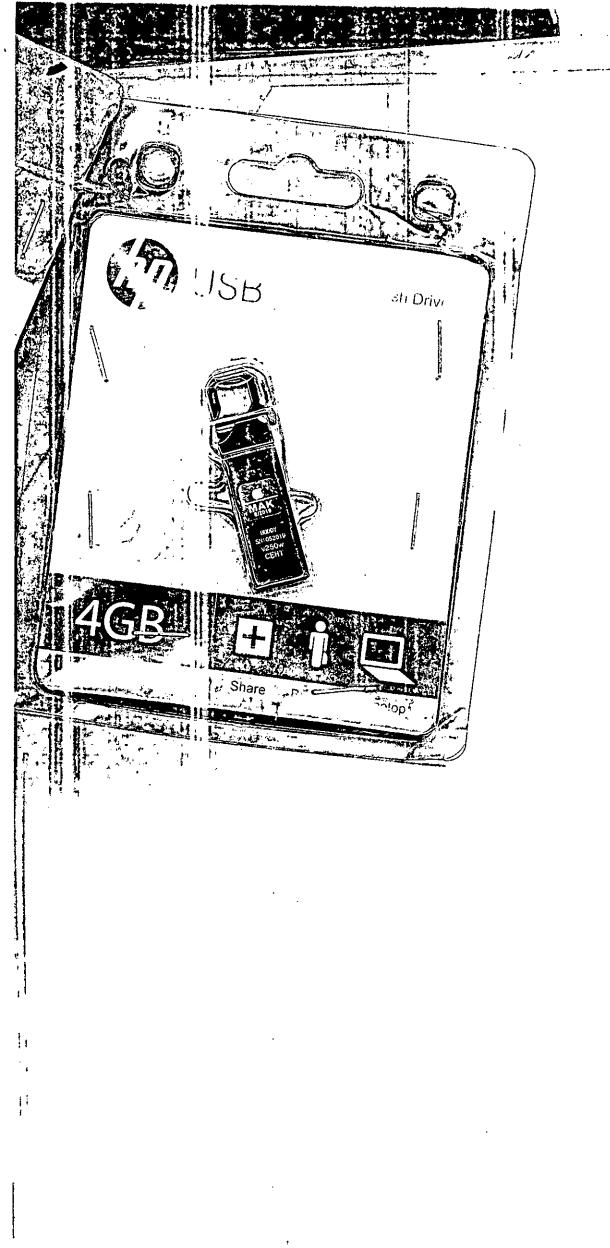
<u>مد 17 روزنامچہ 10.11.2019</u>

ید 17 ریورٹ محمدا قبالRI مورخہ 10.11.2019 دقت 18:00 بج درج صیکہ انچارج ملزم گاردہیتال کے ڈی اے کرک زاھد اصغر IHC نے بذریعہ موبائیل فون اطلاع دی۔ کہ ملز مہ فرخ ناز ہوہ مصطفیٰ سکنہ بنون بجرم 302 تھا نہ تم جوداخل ہپتال کے ڈی اے ہے۔جسکے ساتھ ایک جوان العمر بیٹی سدرہ جوملز مہ کی مدعیت کے لئے موجود ہے کوئی ٹیلی فون پر تنگ کرتا ہے۔اطلاع کے پیش نظر وہاں پر گارڈ کمانڈرزاھد اصغرنے خالات سے اگاہ کیا کہ ملزمہ کی بیٹی صدرہ نے کہاہے کہ میرے ساتھ جس نے بات کی اسکاریکارڈ موجود ہے میں نے باجواباً کہا کہ سنیپل ساجد نمبر 05 کے نمبر پر دانش ایپ کریں ۔جس نے کنسٹیبل ساجد کو دانش ایپ کیا۔ جو DSB انچارج رحمان اللّہ کی با تیں تھی کہ اس دوران رحمان اللّٰدانیجارج گارڈ کمانڈرزاھد اصغرکونون کیا کہ پیڑ کی باہرچھوڑ اؤ تا کہ میرے بھائی سےمل جائے۔ میں ہپتال کہ باہر کھڑا ہوں اس دوران میں نے گارڈ کمانڈ ریے فون لیا اور رحمان اللہ سے کہا کہ RI صاحب بات کرر ہا ہوں میں نے رحمان اللَّدى آواز پیچان لی۔ادرساتھ کہا پیغلط کام کیوں کرتے ہوں ۔فوراموبائیل بند ہوئی جملہ خالات DSP/HQrs صاحب کے نوٹس میں لا کراس اثناء میں جنابDSP/HQrs صاحب تشریف لا کر صورتحال بالا کواپسمیں گفت وشنید کرتے ہوئے ڈی ایس پی صاحب نے کنسٹیل ساجد کوکہا کہ آپ نے واٹس ایپ کیوں کیا ہے۔ مذکور کنسٹیل نے باجوابا کہا کہ واٹس ایپ میں نے نہیں کیا۔ جناب RI صاحب نے تسلی کرنے کی حاطر مسمانۃ صدرہ سے کہا کہ آپ کنٹ پیل ساجد سے موبائیل نمبر پر دانش ایپ کریں مزکورہ نے دانش ایپ کیا۔ میںRI نے رحمان اللہ کی والس ایپ ریکارڈ نگ سی ۔جوداقعیDSB انچارج رحمان اللہ کی آ وازتھی ۔جومسما نہ صدرہ کے ساتھ نازیبا گفتگو کر ہاتھا۔ بس اسی اثناء میں جنابDSP/HQrs صاحب نے کانسٹبل ساجد نمبر 05 کے متعلق کوارٹر گارڈ بندی کاتھم کیا۔ مزکورہ کنسٹبل کوہمراہ لاکرفوری طور پر بند کوارٹر گارڈ کیا گیا۔نقلمد بغرض انفار میشن افسران بالا صاحبان کی مدت ارسال ہوگی۔

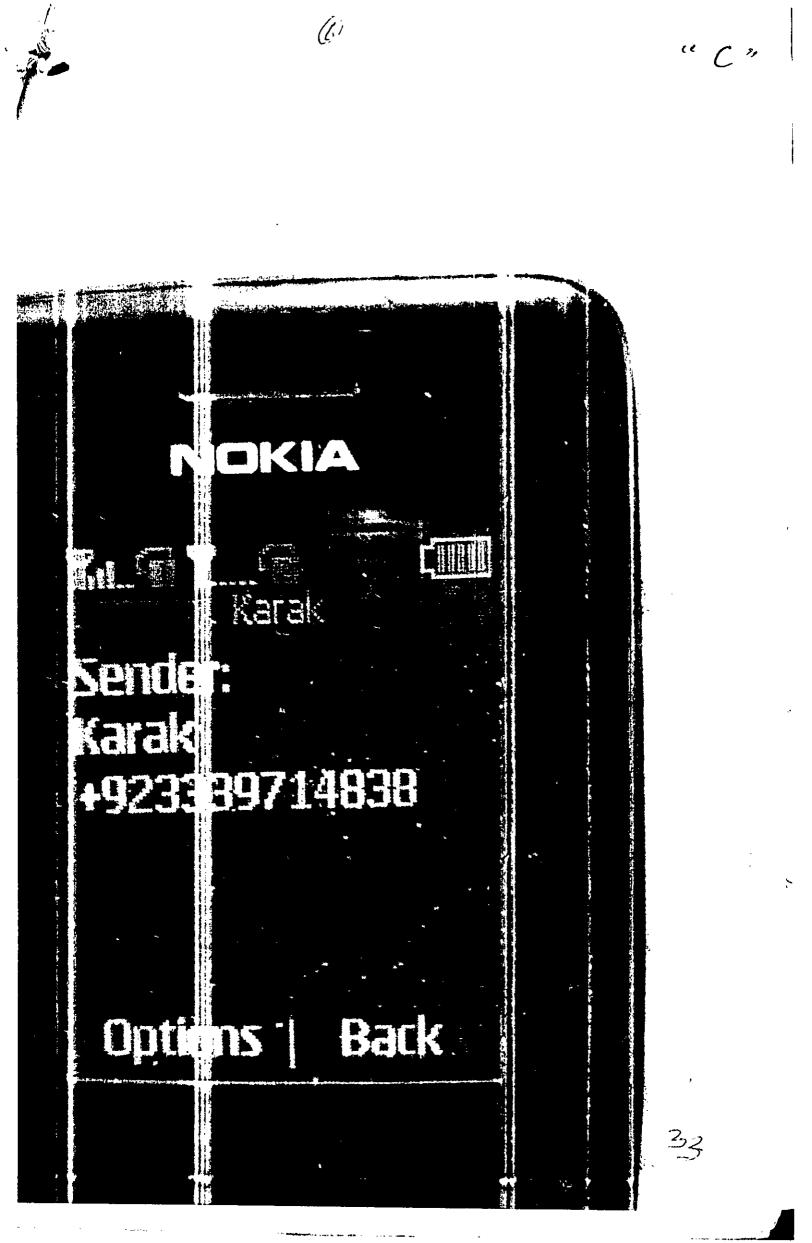
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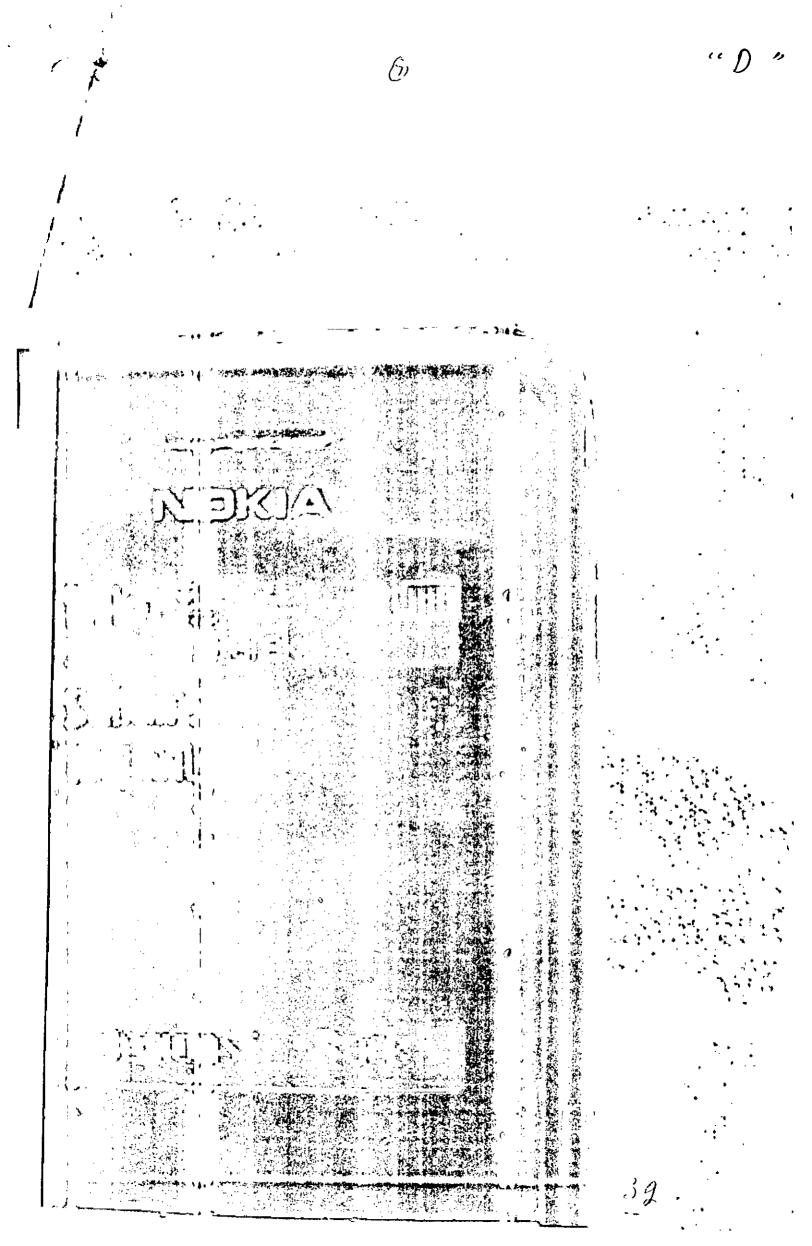
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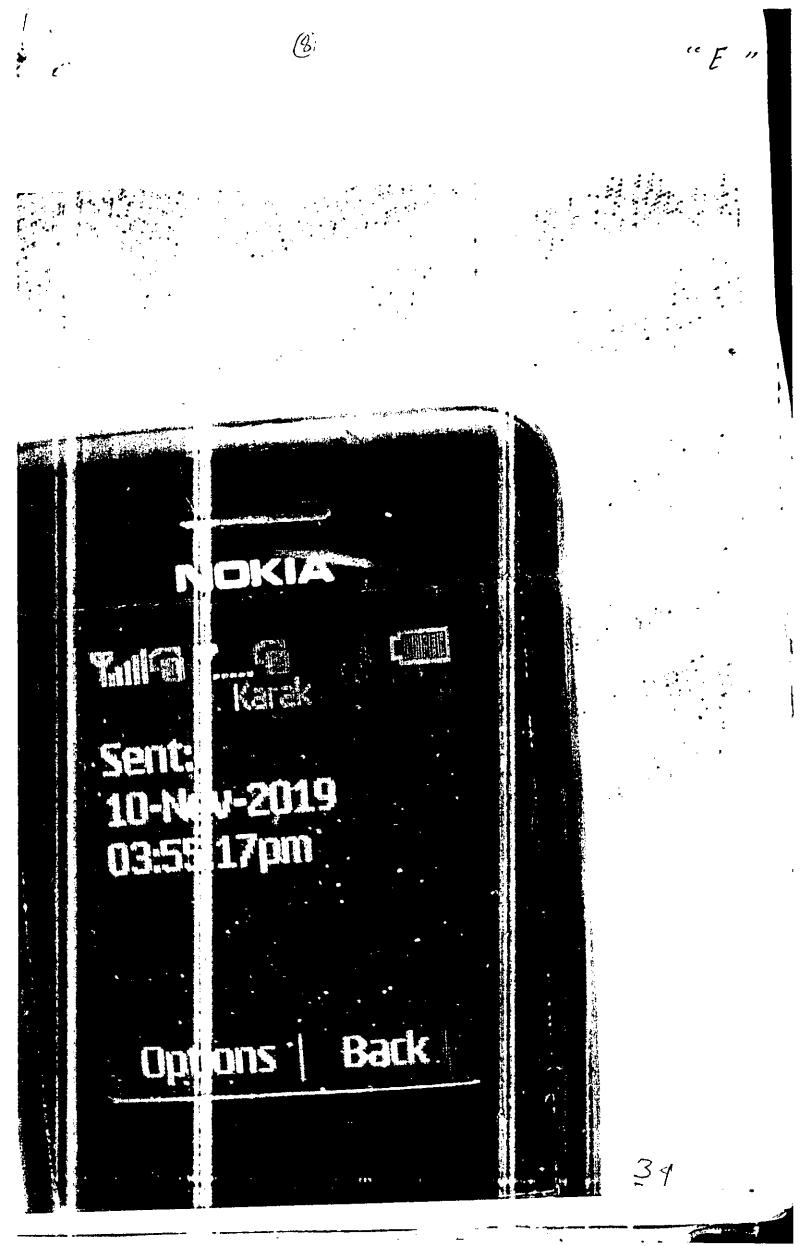
ور1 درزا<u> المراجم الم</u>-1 د ل<u>ر</u>ايس الدين مدجرا د مورد عدد مال اع ورضه المرا دوت 00 18 مردج معبد (مادج ملدم مادد سبال ٨٥٨ برف دامد اجمعت بال في دروني منظر الملاع دى. كم ولاعم منرج كاذ بسود معلق سعند مرب عمرم 200 معام لم مرج داحل مستال KOA ع مسك سالموري جوات الدريس سدد ، جوملاً مر ت مردبت كيلاً وجود في كرف شيل فون يرتنك الرباع الملام من ندط جالا et ن الراد ما ندر دامعد اجمع فالمست المان ميا كرمندم کے بیٹی مسرور نے کہا ہے ، مہمیر سے سالی جب کے بات کی ایسلی دیفان موجدد مع میں نے باجراباً کی مرتب ساجد کو سے بنر بر معدلمه بن کریں جس نے منک ساجد کو معدلمه می ج BB ریا، ۲,۶ ان اللہ مى بالمين مواس حدد دام د جاف الله الجارج ما در ما فرم مراهد ، جمع المعسران مون میا که یم مرتف با در جوز در مرم میر الله ملے جاتے . میں بهتال م بام ر مدر رمین رس در دان میں ف تا در مادر م والجليون ما ادرس ف دحاف الله وما الم الم ماه بالم رع مون . ساف دچان الله ى أواز اساف ل. اد ساقو كما يم علاط کا تین تر ت بر فرد مولی مر ال . عد طلات pen ماه یے نوسی میں در اس دنیاء میں) جنا بر He ad en مادى فى تسلى درف ى حافر معاة در مرد سى در ار براب د و ماد Rice in patran is is it watsap in in anter in in the ف د مان الله ى دانس اب درماد: الدسى . جود مع د جان الدانياد 2 BSD مرادر معى . جرمعان مسدد، م م مالد ماز ساكنتكو مريخ مما . بسماسمان المناع على حماج وماحب عون والرف ساب مسی متعدین تو در گارد بند ، کا صبم میل وزیر ، منت کو سیس ، تو تو در طور ، ر مر ما ورومها در مراحما . معلد بغرض الفارديس المراب الم محاما ماى مور مرى المارى forwirded منا- عالى ، نقل بر عالماً المل ع militer NKK 12-15 MMPLKK

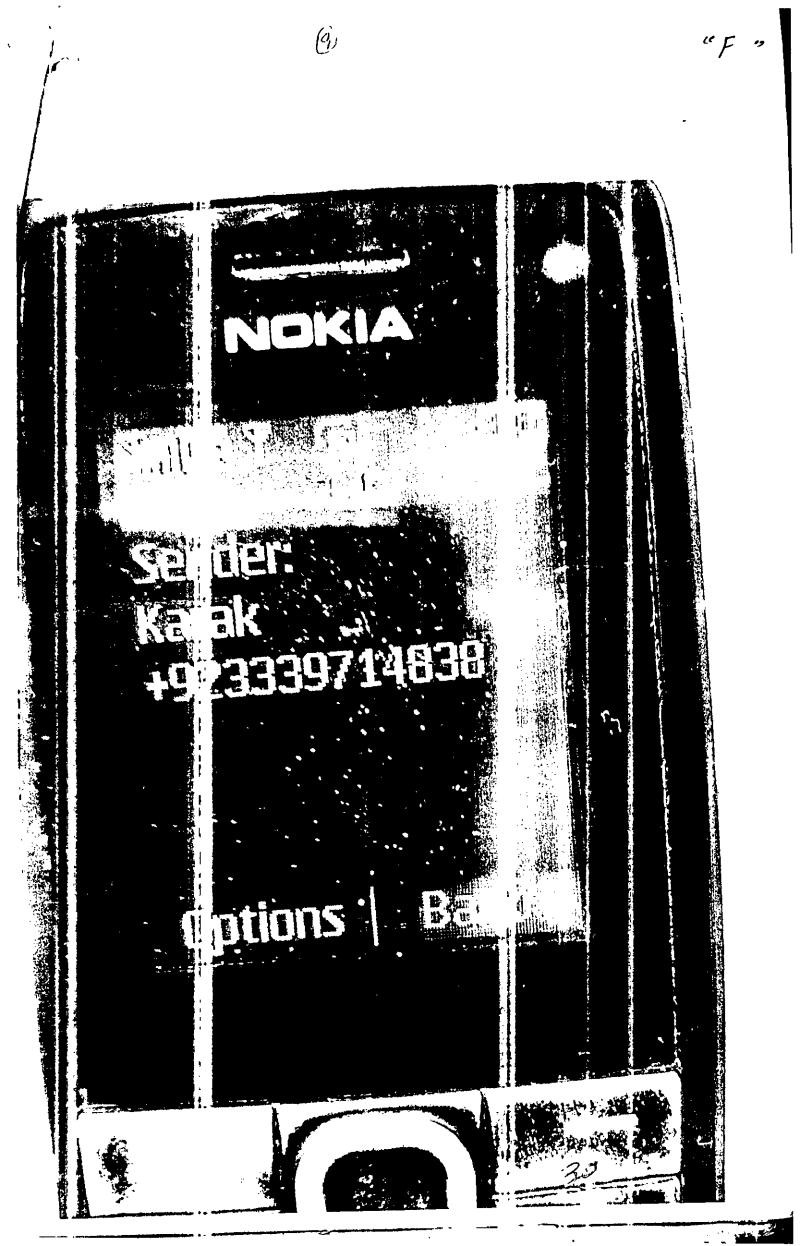


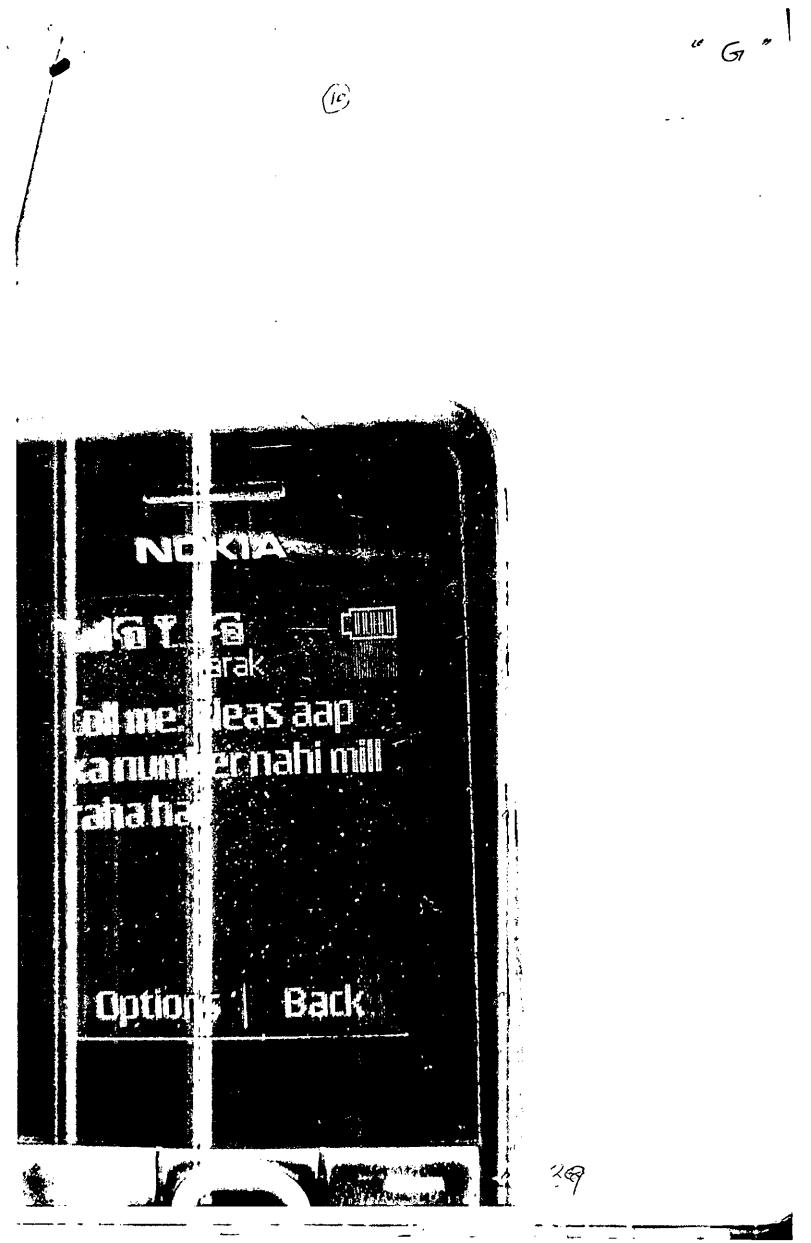
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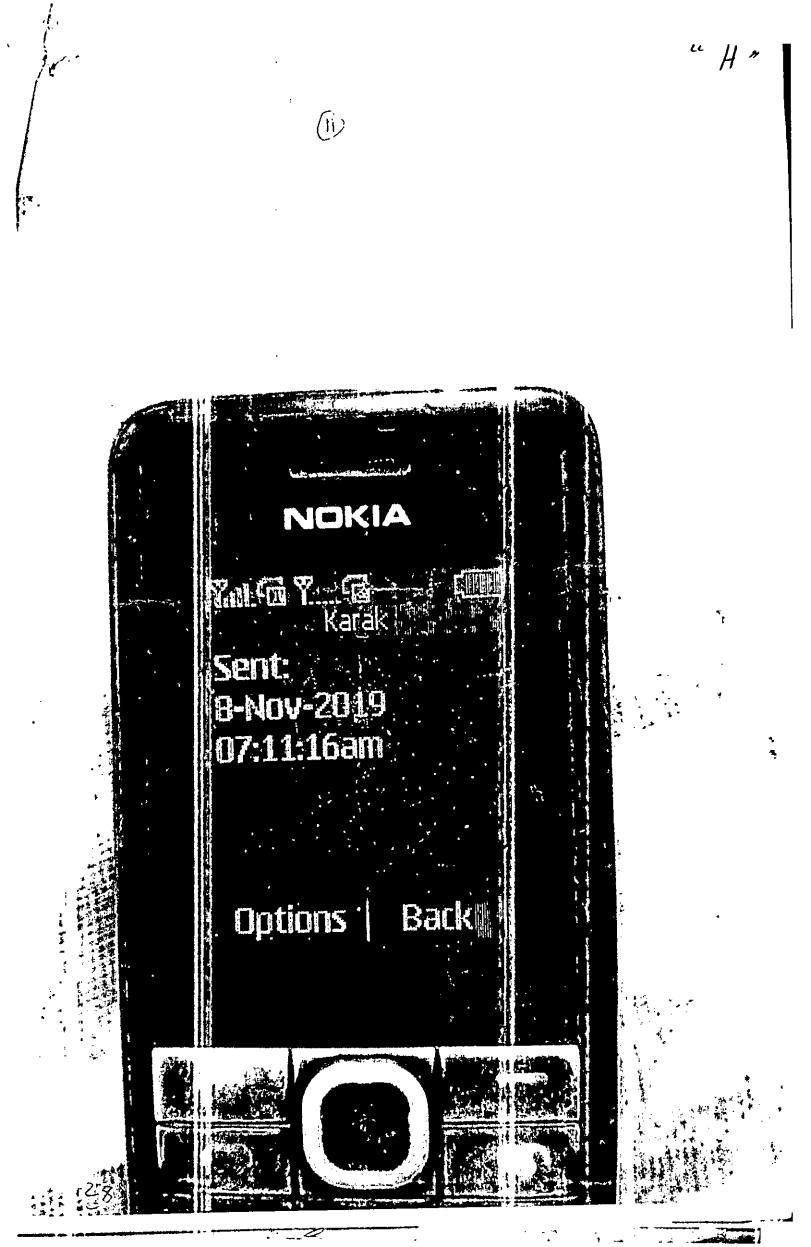












POLICE DEPTT:

KOHAT REGION

ORDER.

This order Will dispose of a departmental appeal moved by LHC Rehman Ullah No. 17 of operation Staff, Karak against the punishment order passed by DPO Karak vide OB No. 517 dated 29.11.2019 whereby he was awarded punishment of three years time-scale on the allegations of developing illicit immoral relation with one Sidrat-ul-Muntaha d/o accused Mst: Farah Naz involved in a criminal case.

He preferred an appeal to the undersigned upon which comments were obtained from DPO Karak and his service record perused. He was heard in person in Orderly Room held in this office on 25.06.2020. During became the appellant did not advance plausible explanation to prove his innocence.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the same has also been established from audio recording saved in phone memory of Sidrat-ul-Muntaha. However, the punishment order passed by DPO Karak appears to be harsh as compared to allegations. Therefore, three years time-scale punishment awarded to the appellant is hereby **reduced to two years**.

Order Announced 25.06.2020

-sd-(TAYYAB HAFEEZ), PSP Regional Police Officer, Kohat Region.

No. <u>6891</u>/EC, dated Kohat the <u>06.07.2020</u>.

Copy for information and necessary action to the District Police Officer, Karak w/r to his office Memo: No. 246 /EC dated 08.01.2020. His service Roll & Fauji Missal is returned herewith.

> -sd-(TAYYAB HAFEEZ), PSP Regional Police Officer, Kohat Region



POLICE DUP DE

JOHALRIGIOS

<u>ORDUR.</u>

This order will dispose of a departmental appeal moved by FHC Rehman Ullah No. 17 of Operation Staff Katak against the punishment order passed by DPO Katak vide OJI No. 517, dated 29 11 2019 whereby he was awarded punishment of three years time-scale on the allegations of developing dheat interact d relations with one Siduat-ul-Muntaha dio accused Mst. Farah Naz involved in a criminal case.

He preferred an appeal to the undersigned, upon which considers were obtained from DPO Koral, and his service record perised. He was also hand in wetsen in Orderly Room, held in this office on 25.06.2020. During hearing, the appellant did not advance plausible explanation to prove his innocence.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the same has also been established from audio recording saved in phone memory of Sudrat-ul-Numtaha. However, the punishment order passed by DPO Karak appears to be harsh as compared to allegations. Therefore, three years time-scale punishment awarded to the appellant is hereby reduced to two years.

Order Announced 15.10 -2020

(TAYYAB HAFET Zilusa Region Police Office). Keltat Region

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No. 68 St. EC. dated Kohat the 617 -2020.

Copy for information and necessary action to the District Police Officer, Karal, wir to his office Memo: No. 246/EC, dated 08.01.2020. His Service Roll & Ljuqi Missal is returned herewith.

SRCIPO (TAYYARHATTZ) 284 Region Police office. Alighet Ericesia

<u>order</u>

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My this Order will dispose off the departmental enquiry against LHC Rehman Ullah No. 598 of this district Police.

Facts are that as per Daily Diary Report No. 17 dated 10.11.2019 that accused Mst: Farah Nazi r/o district Bannu presently confined in the Central Jail Karak in offence of murder. LHC Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reason who is medical attendant of her mother at KDA hospital Karak. Wherein immoral conversion was recorded in her mobile, in which LHC Rehman Ullah No. 598 entice her for his undesirable needs. This is quite adverse on his part and shows his indiscipline attitude in the discharge of official obligations."

He was issued with Charge Sheet and Statement of allegations. Initially. Mr. Muhammad Ashraf SDPO B.D.Shah was appointed as an Enquiry Officer. Meanwhile, accused official submitted an application requesting therein that he has no confidance over the Enquiry Officer. His request was accepted and the said enquiry was marked to Mr. Amjid Ali SDPO Karak to conduct proper departmental enquiry ágainst him and to submit his findings within the stipulated time.

The Enquiry Officer reported that perusal of relevant record and adopting all legal and procedural formalities as well as listening the audio call recording between defaulter official and Mst: Sidra Tul Munteha, the allegations leveled against defaulter official LHC Rehman Ullah No. 598 are hereby proved.

Keeping in view of the available record and facts on file, perusal of enquiry papers and recommendations of the Enquiry Officer, he is found guilty of the charges, his this act is against service discipline and shows his contaminated mindset and indiscipline attitude in the discharge of his official obligations being a member of discipline Force although the defaulter official at initial stage performed important role in tracing the accused in case FIR No. 538 dated 22.10.2019 u/s 302 PPC PS Latamber but later on, he deviated from his lawful obligations. He enticed stranger women for undesirable needs, therefore, in exercise of power conferred upon me, I, NAUSHER KHAN, District Police Officer, Karak is hereby imposed a major punishment of reduction to "Time Scale" for period of three (03) years upon the defaulter LHC Rehman Ullah No. 598 with immediate effect.

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OB No. 241 Dated

District Police Officer, Karak

US jul - jub / freed 13/2/2/2 اند مس حد المعم حاشة تك 05 Revuest for transfor of we 11 01 ENVUIRY-3228/94V / Gol المتعلمة ما روز ج ج المار المرابق 11 0 القلمد 17 رزادي 11 ما ولي المن 11 01 426-MENE de de de 12-11-19 4 02 المركب وأبل فوار المك ميت 4 06 2 برن جون مدرة المنتباء 0 02 Atte martinistic 8 4 01 1) مرجب بمرز sms مرطلف مرطل المر 144 4 02 الطلاع وشرانسف الكوليس مرادوست 01 " بالماكان رض المترابي ر مح 4 02 - محفقو الل 1 of 21 - July - 2.0 2 بان جوان مفهودهان <u>اح</u>قاح لم 4 01 2 بلى الكذان جشير خان جلا تما ت ممسين 1 01 د المن المدان تشغيل في ساحد ك 1r 02 Ri נול בגול בגול בול בול 02 مر 12 مذاح بالما الملي المان كروي 0 18 مر 15/10 مساليتر شاه مع رفي 2 محول 01 (47) Elat (p 2 ما مالان مع ل الرار ال 4 مرد ال ĺ1 01 286 5 10 101310 20 01 24 مرد الم معرى الم مرد الم 143 11 01

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No. 545 /Hars: Dated. 25-11- /2019

Kindly refer to Charge Sheet No426-27/PA(Enq), dated 12.11.2019, issued to LHC Rehman Ullah No. 598 I/C DSB Karak:-

ALLEGATIONS:

"As per daily diary report No. 17, dated 10.11.2019 that accused Mst: Farah Naz r/o district Bannu presently confined in the Central Jail Karak in offence of murder. LHC Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reasons who is medical attendant of her mother at KDA hospital Karak wherein immoral conversion was recorded in her mobile in which LHC Rehman Ullah No. 598 did entice her for illicit relations.

Initially, the departmental enquiry entrusted to SP Investigation, Karak who due to huge burden of official works did excuse from conducting the enquiry proceedings and the same marked to SDPO Banda Daud Shah who recorded the statements of Mst: Sidratul Muntah d/o Ghulam Mustafa r/o district Bannu and IHC Zahid Asghar incharge guard MLC KDA Hospital. During the enquiry proceedings, the defaulter official, LHC Rehman Ullah preferred an application that he has no hope of fair and transparent enquiry proceedings from SDPO Banda Duad Shah hence requested for changing of enquiry officer. The competent authority entrusted the enquiry to the undersigned.

According to the statement of Sidratul Muntah d/o Ghulam Mustaf recoded to SDPO Banda Duad Shah that her mother was arrested in the case FIR No. 538, dated 22.10.2019, u/s 302 PPC PS Latamber and was under treatment in KDA hospital Karak and she was there for her mother help, LHC Rehman Ullah, Incharge DSB Karak frequently made mobile phone calls at her mobile number for illicit relations. She further stated that one day LHC Rehman Ullah alongwith Constable Zia taken her to unknown place and enticed her sexual intercourse but she denied and pretended.

IHC Zahid Asghar Incharge guard MLC ward KDA hospital in his statement recorded to then (E.O) SDPO Banda Duad Shah that 10.11.2019, at about afternoon, accused Farah Naz mother of Sidrat ul Muntah made noise in the ward and complained about unknown person telephonic calls to her daughter Sidratul Muntah for harassment. Incharge guard brought the same issue into the notice of RI Police Lines Karak who visited the spot. RI Police Lines Karak heard the telephonic call and recognized him as LHC Rehman Ullah, Incharge DSB Karak.

Similarly, the statements of SHO Jamshed Khan and Oll Maqsood Khan Latmaber were recorded, placed on enquiry file. Both the officers appreciated the efforts of the defaulter official concerning to the case FIR No. 538/2019 of PS latamber and mentioned in their statements that the case was successfully workout due to his strenuous efforts upon the CDRs. As regard the allegation regarding illicit relation with the daughter of the accused Farah Naza Mst: Sidra tul Muntaha who was attendant with her mother at KDA Hospital Karak, no complaint from the accused was received to them, they added.

Apart from the crux of statements recorded by then E.O SDPO Banda Duad Shah which cannot be altered, the undersigned summoned the following Police officials, heard in person and recorded their statements in order to reach a logical conclusion.

1. Inspector Muhammad Iqbal, RI Police Lines, Karak.

2. LHC Rehaman Ullah (defaulter/accused official)

3. HC Habib Ullah Shah (Incharge Causlity KDA hospital)

4. Constable Amin Gul No. 286

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5. Constable Noor Islam No. 374

6. Constable Muhammad Sajid No. 05

7. Constable)Uzair Ullah No. 313

8. Constable Arshad Iqbal No. 169

9. Constable Zia ur Rehman No. 385

10. L/Constable Samreen Begum No. 247

All the above Police officer/officials endorsed in their statements that LHC Rehman Ullah, incharge DSB Karak made a telephonic call to Sidratul Muntaha for illicit relations except Constable Uzair Ullah and Arshad Iqbal at Serial No. 7&8 who were on (Shabasi) leave while Constable Zia (accomplice official) repudiated the allegations leveled against LHC Rehman Ullah.

The defaulter official LHC Rehman Ullait confessed in his written statement that he made telephonic call to Sidratul Muntaha, daughter of accused Mst Farah Naz for recovery of some evidences, and SIMs used in the offence through different strategy and factics.

Apart from the above proceedings, an application submitted before Reserve Inspector Karak by the constable Amin Gul No. 286 wherein the applicant expressed that the defaulter LHC met to him at main gate of the office of undersigned and told him to record his statement in his favour. Application further record his statement based on facts instead of his favour. The application of the said constable was shown in the daily diary No. 33 dated 15.11.2019 police lines, Karak, placed on file.

Conclusion.

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From the perusal of the relevant record and adopting all legal and procedural formalities as well as lestining the audio call recording between the defaulter official and Mst: Sidra tul Muntaha(preserve in the attached USB), the undersigned reached to the conclusion that the allegations leveled against the defaulter LHC Rehman Ullah No. 598 are here by proved, please.

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Dy: Superintendent of Police, Hqrs, Karak

From: The Superintendent of Police, Investigation Wing Karak. The District Police Officer, Karak. To: No. 3228. /Inv: dated Karak the 12, 1/ /2019. Subject: REQUEST FOR TRANSFER OF ENQUIRY Memo: Kindly refer to your office Charge Sheet No. 426/PA(Enq) dated e i i 12.11.2019 on the subject cited above. It is submitted that the enquiry against LHC Rehman Ullah No. 598 was marked to the undersigned. It is pointed out that due to the burden of official and important works, it will be difficult for the undersigned to conduct the said enquiry well in time. In view of the above, it is therefore, requested that the said enquiry may kindly be entrusted to any other Enquiry officer, please. 招招 Superintendent of Police,) and Dand Shah Investigation Wing Karak and 12 of Steph Jewin DP micei en l' SidPo District Police Officer 2 - mp Jun 0; 1,19 - 1, MIO 598 13/ 13/ 15 Cu /1/ 100 Solla Sugar Oil Milling Jeiger in 2 ind Jun DHG 2 ver ver and son 2 Ĩ,11 (17)

14 E 10-13- 342 11 1 13 ل اس لا في 影 راحل بالمماندي با مرال الان بي من ال الماجا بتابون مين في آباكم حا، ارجو وال الم المرار من مل ب مرد ، اد موت مدا بر زب مسال زما تن من سال آر 1. مراجع سے معلومات مربل جس میں طاہر ترل م مرسے کی ا رواجد المن عرى في المرا جميد المراجر المرهم من المراب ال مردوا مع بمرات عظرا جمع اس مل الل في وزير ابا ، مرد حل ال میں دو جود ہتے است ایک فرد نے کالے ایں اس محد حات ان کا مک الراج منجل الم المحص الرأس - الرف الد ذكر النب ا ی از المالات از اجازا نا ای از ای موت دان بن دی در اسل می این آیا . ا. in aden و تر . ا کم تک وركور محركوا الريال المراد من درو الريال السريد الت العالي العالي حاب محطم الرسى المن مے نواب الا در در ارج الراقع من عرب مر برارت موتی از تعددات عقب، ، برد مرب از مس لوجرن اطلاعیایی مورد عمر مد برارت مرد ا ر. ماب مع ماعب از من ادر مام م ماد . برا دمر . ماب مع ماعب از من the -lis لد ب بر والب (م.) ٤ onfilled TOM Sir Forwarded mm pl KK ~ Som 10-11-19 RİKK 10-11-19

(3) ورجا ورزال المراح د لوايس الدين مدجر ربعد عدد مال اج ورضر الما دخت مع 18. بو ررج معتبه رواد 2 ملدم خارد سیال KON وف د عد اج مد بال ب در د معد ا عد ع. كم ولاعم مرج كار اليون معطفي سعند الرب عبرم جود معام المعرود احل بستال KOA م مس سافرد برجوان الدر مس در د وجود المرصر ف مردت كيلاً موجود في كرفى شلى حوف يرتبك الرياع الملام تي ي تدطر جالروع ن بر الدد كما تذر دامعد اجمعتر في حالات ما ما ميا برمندم کے بیٹی اسروں نے کیا ہے ، مہیں سے ساتھ جب نے بات کا رہیں ریفان موجدد من من في الحزابة كم ترتب المدين من من برم معد 销 ترون جس نے مذکن ساحد کو جمعتمد س جو Bson اللہ مى بالين المعين تمراس حددات ديمات الله الجارج حادر عاقد فراهد واحد والمعسرات من نیا که بر مرفق بایر چوز در سر میر سے ساتھ ملے جاتے . س میت اے باہر تحدثہ ریروں رس دورانے میں نے تا در مانز رس والجرف ما الدمين في وحاف الله وما المراج ماه بالمر رع مون . من في د حاف الله ى روز المالي في الد سالوكا مر علاط مر میں تر منہ ہو . فوڈ مو بائیل مد مرتی ۔ جمہ طلات معمام اف سے نویس میں تد ہر اس رہ کا م میں جہا ب مار محاصر تعشر بیا لا تد جود مال مالا تو أرب من كتب ومت مد الإ ت مرم منا مرا م فرور في في الحال الم معلمان من في المادي جا- ٢ مادب ف مل الم معاد معاد مد مر مع ما المراب الم مراب Rice in quatrap entry a site of a partian as in the ف د مان الله ى دار من مرك د مكاد الله منى - ج دامى ر حاف الله الماري د م BEDE می جرمیان میں در اے مالی از سالی از سالی تعلی 30 بسم اسی اترا محمد جد معاجد مرد مراحب محق والد نے ساجد دور سے متعلق توامر کا، د دور یا کا حکم دیا ۔ درکور، دیک کو سے ان کو تور بطور مر مند ما ود ما ما العلى العلد بغرض العاد مست ام الم الم عامل ما ى مديد مرار المارك EVTILILLE de Ule-lis forwirded Conffeeth MMPLKI

/PA(Enq) No. /2019 Dotod

CHAROE SHEET

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3.

I. NAUSHER KHAN, District Police Officer, Karak as a competent nuthority, hereby chargo you LHC Rohman Ullah No. 698 I/C DSB Karak follow:-

"As per Dally Diary Report No. 17 dated 10.11.2019 that accused Mst: Farah Naz r/o district Bannu presently confined in the Central Jail Karak in olfence of murder. You LHC Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reason who is medical attendant of her mother at KDA hospital Karak. Whorein immoral conversion was recorded in her mobile, in which you LHC Rehman Ullah No. 598 entice her for your undesirable needs as per mobile recording. This is quite adverse on your part and shows your indiscipline attitude in the discharge of official obligations. This act on your part is against service discipline and amounts to gross misconduct."

1. This act on your part is against the service discipline and amounts to gross misconduct. By the reason of your commission/omission, constitute miss-conduct under Police disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhlunkhwa, Police Department, you have rendered your-self liable to all or any of the penalties specified in Police Rule-1975 ibid.

2. You are, Itherefore, required to submit your written defense within 07-days of the receipt of this charge sheet to the enquiry Officer is hereby appointed for the purpose of conducting enquiry.

Your written defense if any should reach to the Enquiry Officer within a stipulated period, failing which shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

Intimate whether you desire to be heard in person. A statement of allegation is enclosed.

District Police Officer, Karak

To

- year DPa - L-13 / Front 13 8 RE Rel in 10 19 19 18 E 11. 50 the joint appoint is S.R.C. Such the find as and and a dread DING ING INCOMPOSITION UST. Provide De 2 elg 2 2 Delle filles de vois is de Cripo 233 Find il openia المراب المسركة مع المحال المنار المرابع Engli 2 strutigion-ola indie D 765 18 - sla / 100 0 2, 140 per we will also 2 plan in A is 31 dessee NIV+98 33397/4838 Jobs fin 2. (2) - Lall me - Please applie number mak mill Vaka Kai - sent: - 8. Doi 2019 - 07. 11: 16am sent 3 Sender. 10-Nov-2019 ykarali t 912 333 9714838 03:55:17,000 Karala Sallam Hi Jamu ~~S.D.P.O The-

DISCIPLINARY ACTION

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I, NAUSHER KHAN, District Police Officer, Karak as a competent authority, is of the opinion that LHC Rehman Ullah No. 598 I/C DSB Karak has rendered himself liable to be proceeded against on committing the following act/commission within the meaning of Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department.

STATEMENT OF ALLEGATIONS

"As per Daily Diary Report No. 17 dated 10.11.2019 that accused Mst: Farah Naz r/o district Bannu presently confined in the Central Jail Karak in offence of murder. LHC Rehman Ullah No. 598 contacted her daughter namely Mst: Sidra for unknown reason who is medical attendant of her mother at KDA hospital Karak. Wherein immoral conversion was recorded in her mobile, in which LHC Rehman Ullah No 598 entice her for his undesirable needs as per mobile recording. This is quite adverse on his part and shows his indiscipline attitude in the discharge of official obligations. This act on his part is against service discipline and amounts to gross misconduct."

The enquiry Officers

1.

in accordance with provision of the Police Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police Department may provide reasonable opportunity of hearing to the accused official, record his finding and make within 10-days of the receipt of this order, recommendation as to punishment or other appropriate action against the

The accused official shall join the proceeding on the date, time and 2 place fixed by the enquiry officer.

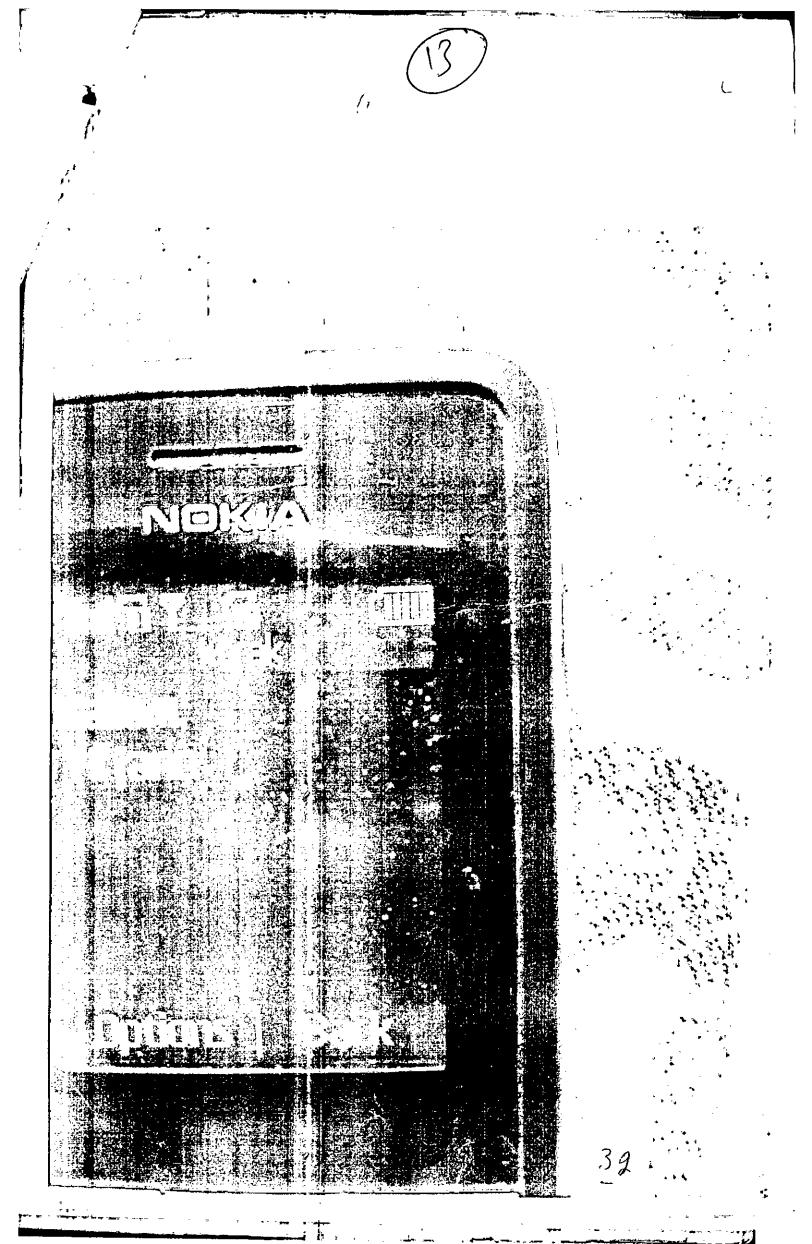
District Police Officer, Karak /PA(Eng). dated 12 / // /2019. Copy to:-

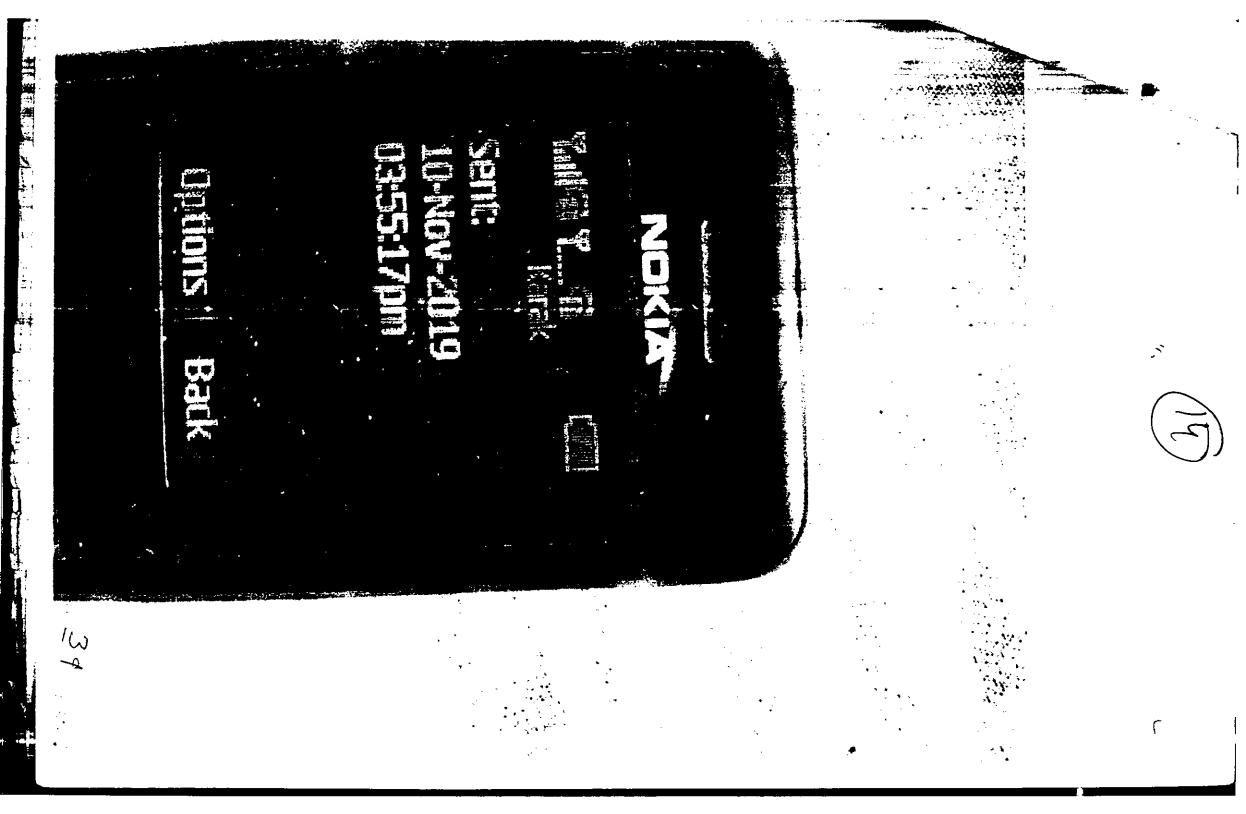
1. The enquiry Officers for initiating proceeding against the accused under the Provision of the Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt: of Khyber Pakhtunkhwa, Police

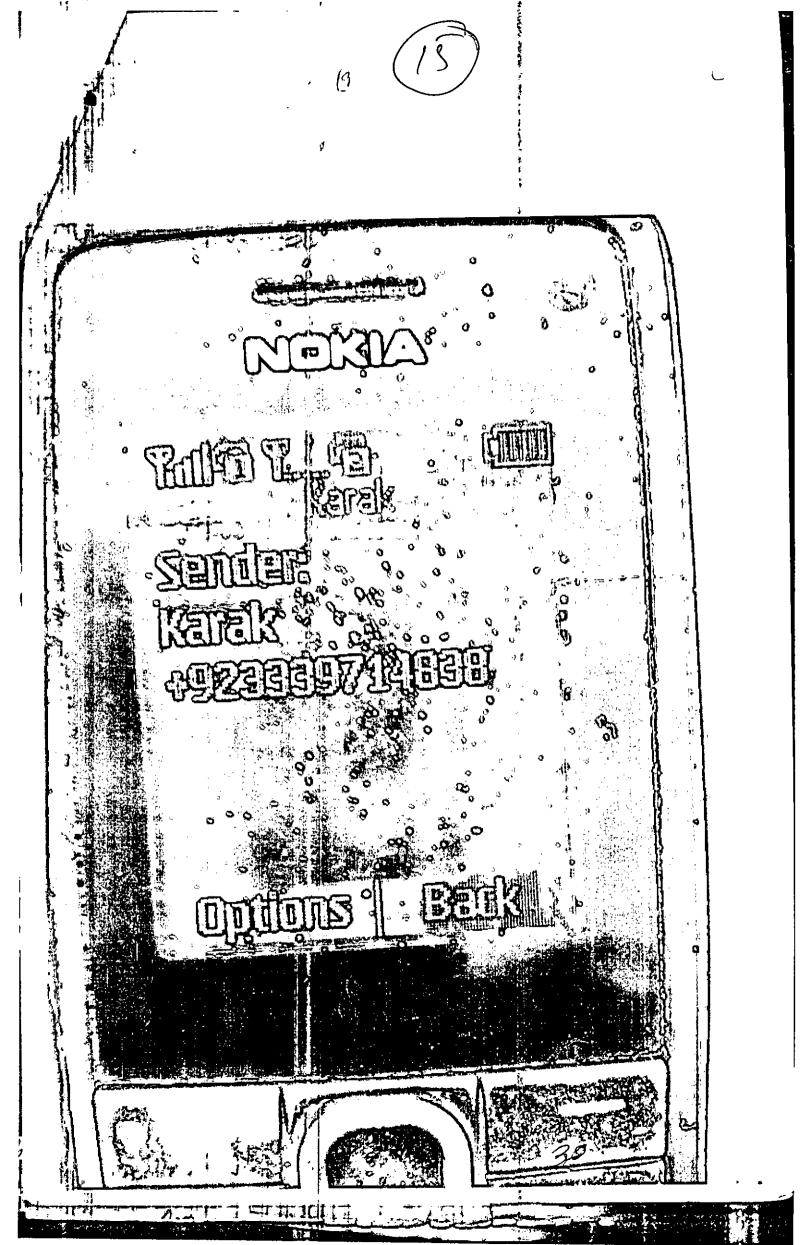
2. LHC Rehman Ullah No. 598 I/C DSB Karak

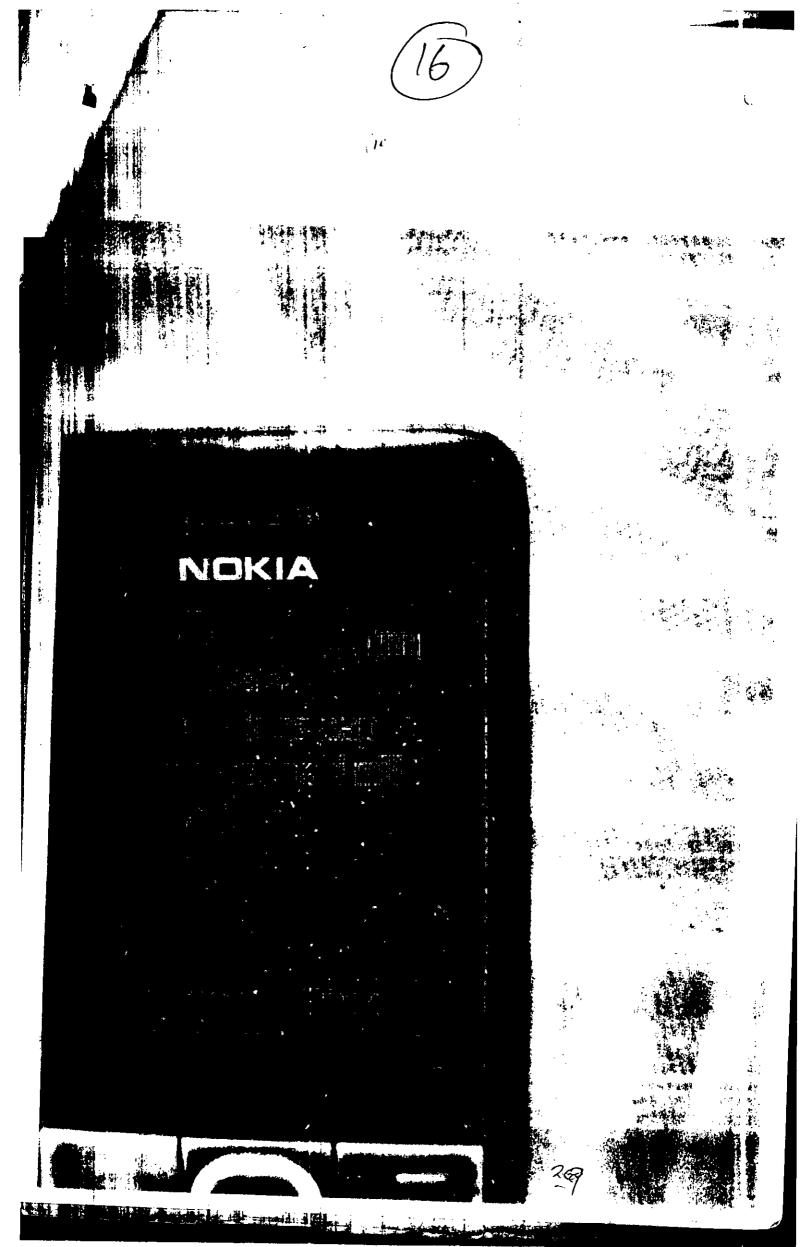
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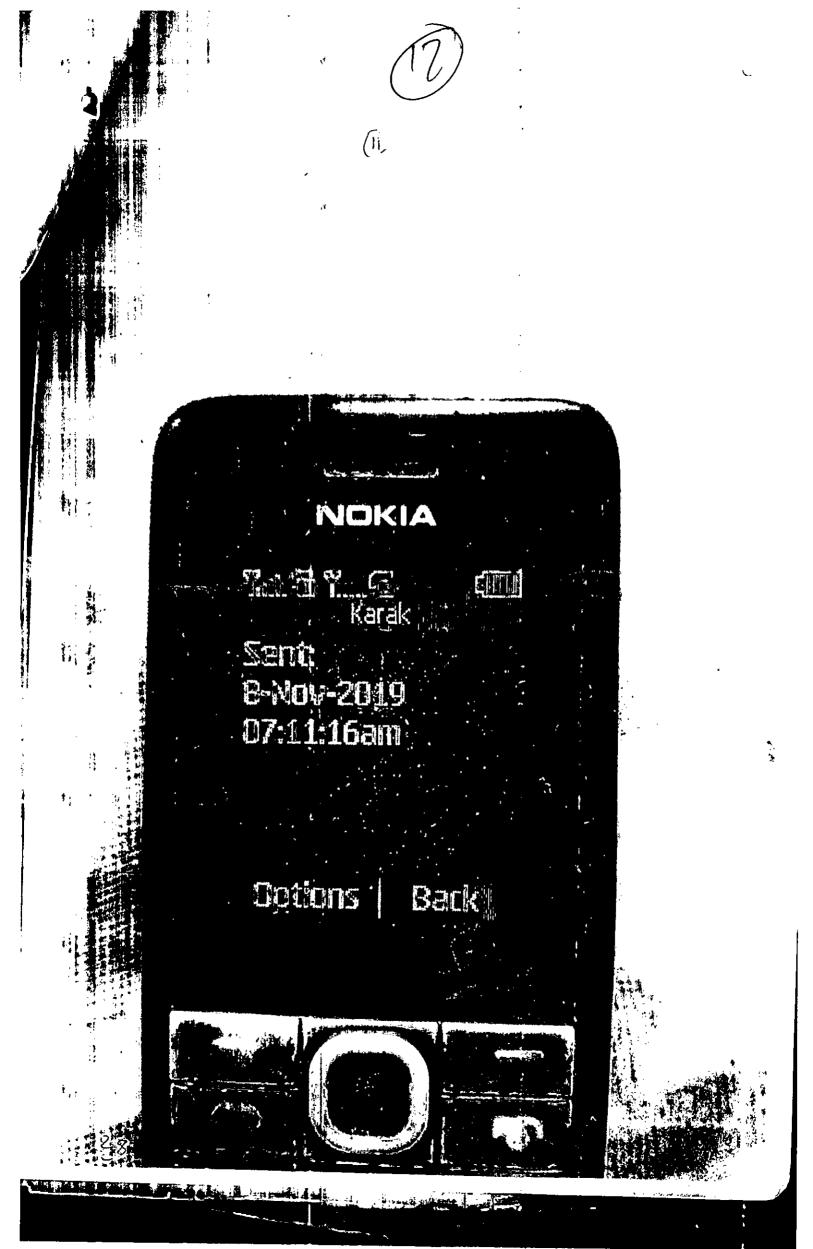
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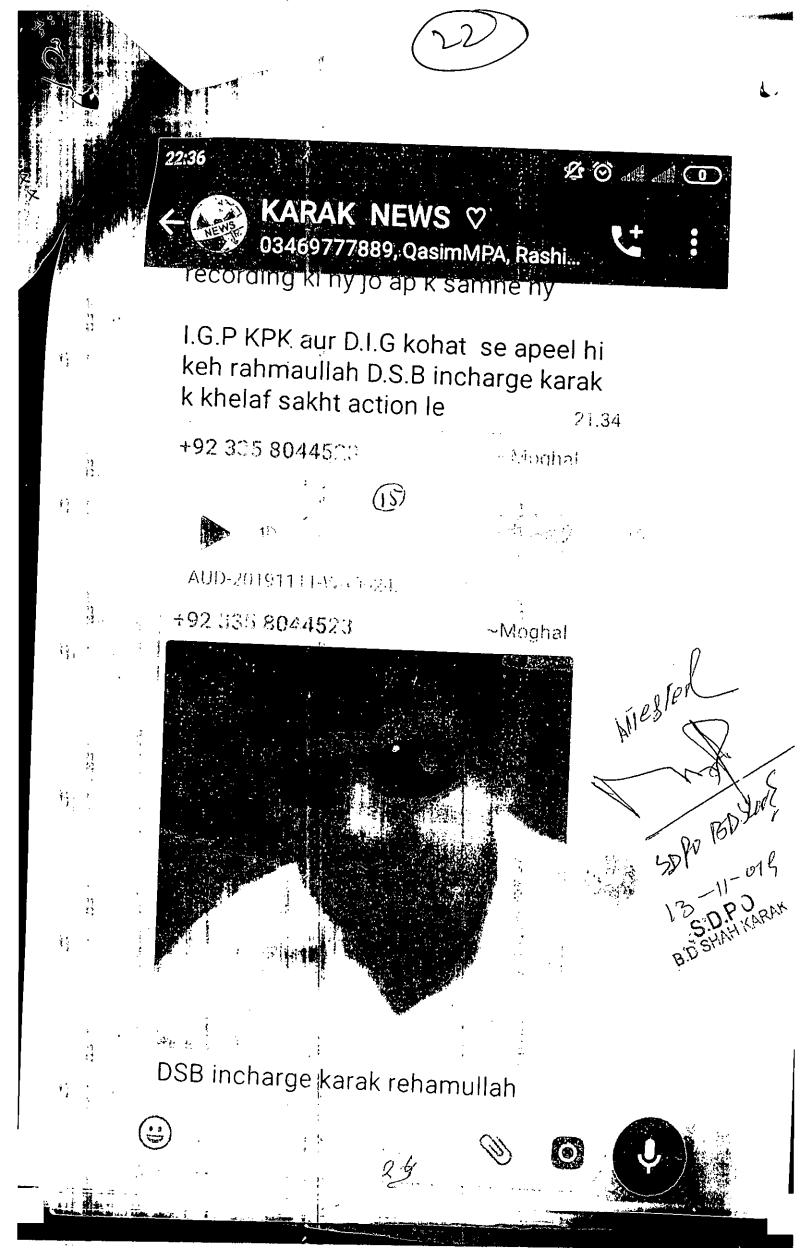
يد ن ازان سدر المسار رسام م حسر علام - له تخبل في ما مير مل ف علقاً علم ليعد ديروني - عرجرد ليدي ماسيل سادم فارتكار 10 216 M 302 (1? 22 10 10538 200 10 010 00 000 100 حس دن لموت دوم ولا لو الم مع معد الم الم معد المع المار المحد الم كسان جريا وأ فرال المساق عياقو موجر لمراجع فالمسيم عمال - مس وال تتبسي عرى فيرا حرى مرود من والمره أم مرح فار ع جمال مراح لمر) بيل المرسي الله الم الم المراد () الم من المرا الم الم الم الم الم المراد المرا المراد المراد الم المراد المراد المراد المراد الم برم) حسل أرس دوان فراند المعد المعدان . مرا الماداده فا فرا ما الا معروف منا وفيا وفيا ولا عنها و المر عالم والر - > كذر هم قد ع - رجن المرافان دلد ما في عد المرافي حرف لم فرائع م دارا من محدين ، مؤلم العلم - توجه مادي : من - روال لا ، والا بالالاج مري الماروالي الله مر مال المر مال المري المري المالية Origent ير المرزالة ادلم عصال الر اس م ر او رسیا دور ا عماد کا کا ما Jau Mi. c. Coll is in the star with the converce يرس نيج لا رقو كما مع معطام - والم المفاق المرفع الما الما الم رفاق المر الإ مر ما مال (vi. Septen م سعا من اور مر ما ر من مر ا معامر اور محول سام م م در محاد مر طرو مراه مر مر مر الا الدار مر مرد الم الحرا الا فالالرا فالراف لولا الم why in the sol ge to as for why why و الم في كما الما المسال الما المراج USIS Wardsold Survey and rell and con and ice econologia de me articio or on constra يوفل ولا ب مر المالا مر مر : 4 相之不

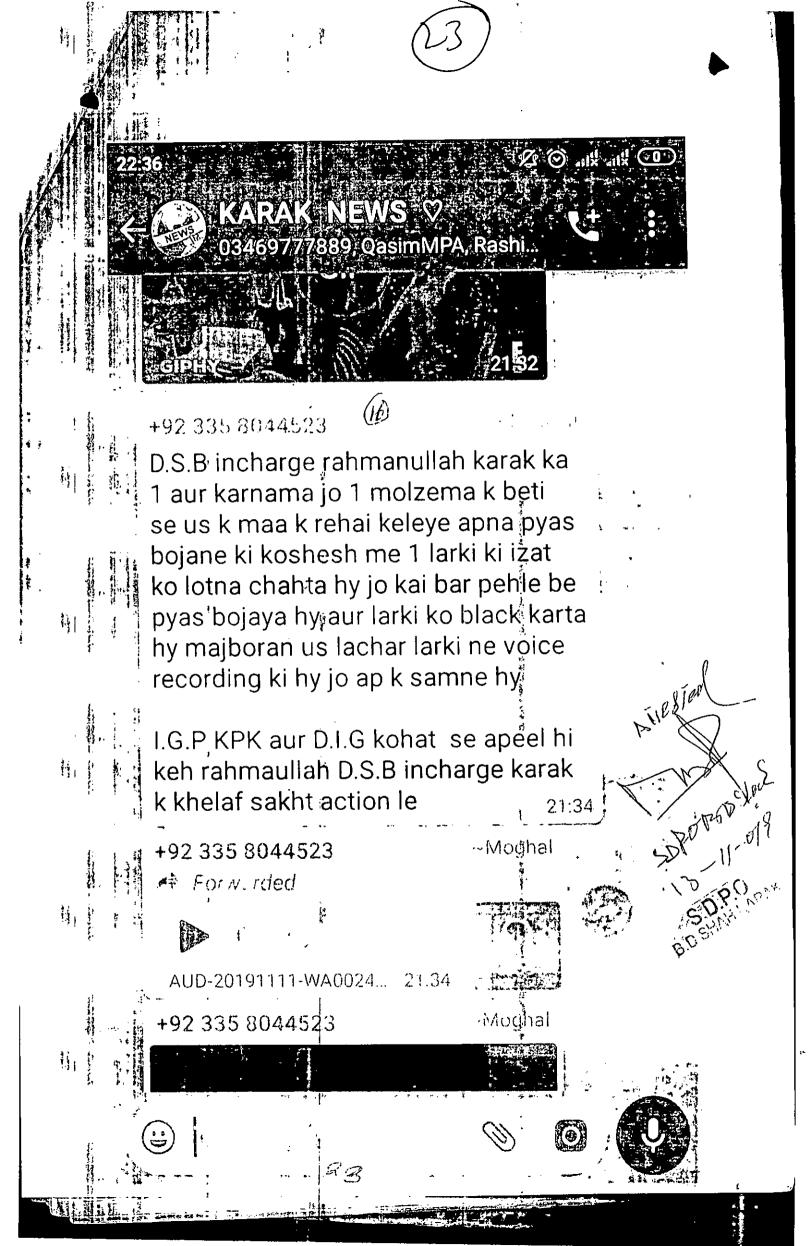
(3) اس المامين مين مالا ، فر مر عملاً دين الله ماريون . حو قدم مين wind all and an an an an and and and and - سليك عبوس فرانا لنا ، و مين- 14 دن يرن فيل مره وال ماجر نفرن في فران فران مراجر بسي سي في الما يون الما يعود المروم الما المروم الما المروم المراجم الم رفانا - مار مار و ران الله خون بلار عنه از من تر جور فانوان ويحار إسارار الحرام مر ان المرد المرز ن در مال الل عبدوا الم مارد المر من ع الل مرامل مری محفظ لا لا . امراز اس عولی الل طول الل در المرول الا لا الله الله الله در الله در الله در الله در الله در الله مری نا مری رو رو روی در الاه الای اوی میں رو رو رو از از مرے مالی لی جانے ، ا ill all sha la zut د م مرم من مغل ها ، الله مع الم من از الله . اور رام الله $\| (Ou a Ou Give on one on one on one of the one one of the one o$ مع معامل المن المن لي معرف علماً على الله المعالية المراب المراب المراب المراب المراب المراب المراب المراب الم بر مرد المراج المراج مرد مرد مرد مرد المرعا معرول (م) 1074 Luck lojai Arre syed 1 jele (m ر در دار زن سری دار زنزن مون Sofor B DSin مارو ما المروار محمعا حمط لور L'il on il agree مرا س برالمر حرم مان مان الموالوك ا مراكب اب سررت والمتعاد ما الإن والده مر معه حقيلال الما العداج ع رامي العاد اور المسالف معاد معدد الماج زائد المقر المقر المرافي عم النسي المر مع الأربي متدا م معان المرابي جراب مين مان سدة المسالين الدون فرونار ودارى دور مردور وروز در در المردان والد سيكس in lane 13-11-15 1. 0jl2pile

שאוינות ליתוצות אוני אות נוע העוושיון נו بانازان زمراجم בעול אייז ייין שוא מוע אמו בעוליו איין שיו איין בי בי ליו אי עון איי - مرد من ال ما تو بوند قرين عد روم عنم ما مرفز الم مر مرار ترمي أسموري ومعنى عنرا محمد من مور مروي . وم مر مراي ماري ما - واد را مر معاور وی ور من شاردی ور از بور مرا و از بور مرا از مراح از از مراح از از مراح از مراح الم He will a give and in the state - in the state of the priveduly موروسهم المرائع - ومكال فان الم من مولان > المرما من المرام من المراج المراد م ردي . كرى معنى كال كرونا مع الدر تعل في م معن دوران سندة والمعنا دير مرد - مرا مرا مرد بسای مراج جر مکرد این او از این او ماد Where is so lide with a company of a fire i a bar a Hanny free and a free and Bills in any service and in the on the state Valant for a volt stole bear. 18.11 Wider a US C. W. EN i la Ri Appelle معر مال من العار حيد با دهر دن اين شور زام اردى بار الاندم الان مرد الم of low man a list d'ai d'ai l'aile a 2. Qu' qu' q Wi a a same subscher. · with or up c lo Ri we have fly relie find i lon Bospect ai ci w in history الم ماليد وسرات وق س مرد + by selficity and - 1 10 13/11/019 ĴŨ ,0 12 Pelice Line" 1 (W Aren 19 and " 1, est ily) M elec 11404 ₽£

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بإن ترزن رجان المسلحارج عدم جوك ا المحق المحتمول حارج مشرف منر 6 21 مرج 10 1 / 10 د مدر دف لولس أ مسرم . اركار مروحان المون. رب جان تل مرخ او برجوالدا م دما الل عرب appin tel bare m. 838 " 538 / 10/ 66 خطى لتمرس فعن الدار كان ولا فر شرف كان لم ماريد ق ابت مر مان و سر از تر از از از از از از از الم ی حرار از ا 1. Li ci - Lo ci - Lo ci - Lo ci - Lo ci - do ca ca ci -حرمين آصران الاتحدام وذخاما حرارات كالرول فيلق زادون سي على تدري من سي ان مان فاذ س سی میں موجع ے وبال البر تے ح CDP ما جل تر بی تے ت المراجعين تحسل في ور المرد المان بولى في وراعت الله ان بی ج از ا تی ترجاری کے سیے میں ان کو ہے : i safe and safe م داخل سیال یک آند می برن درور فی سما یون میں بی روز مرز مردر فی سما یون میں بی از ان 17.1,52 الور اللي المركب معرفان (1) مراج و معان مراج المرج الم من ون من ون من اور وسی مسال جرب از مرد و من من و نسب استال از ا من 20 سی ایک مسک اور وسی مناطق از مرد از مرد از مناطق از از ان می از است ا · Locida. is a construction of the c

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Pier Gree bus inficie, (minor por de l'étéres de l'étéres de la contra de la con 30 - wyw of the work wy with the second with the in the son freis freis freis and the son sh por in and the on on a sp - to en anguilting in 10, DSB Piguin a suo in Asi 6 mining up متن عالم ما مر معروم به در ما مران رس مرز ران ر Much Spierie with go i ass je singer for an en an and a sing work of k en week Serie Og en de a cice de ju juille, une om manie si conjuncie e possivir sil mile il non on a la visorio rice o porce Japanes, columnia if Jan KDA id Mi Rith 2 Sur & Cia - Allosted SMD 22-11-19

بان ازان تشبل فری ارکام هاب عالی مستنزارت مح - رض من مل معرد اللم لولية الفرى م اور مرد ما نزد را بر آب مر الله می HC (KDH) و KDH مر مر مر و ا مر محن جرم الا مستال كم مر مح داخل على - اور م معمر ما ارد معه المرابي رم مر 2 ماز بر ۲۵ من خور خرا به خروع ۷ ۲۰ 1-312-215:00 ترای د براهی می نوان را مر شور شراع است در این W و ماما مرولی تامطرا سی مرا بنای مراح و دار بار کال کر و کا بار مروك في في في المراك مرك لا مراك من المراك . في مار المام الم مورد م عن م رود براز العن عن ما ا ز ار مع ما م و از الم مع ما ا Right is it is the KPAS JRI will is it of a app AI 21 (M) ges jes 201 - W Ziel Delles وتراری رس توج و شیر عروران ما معلی خواج و مرفع و مرفع و مر مركاز بر مال در ابور م مرمر ی سی مرز می مولی فول او بی سر تر با كو فارم الم تحرير المراكم مراد م المراب الم المراب المراكم المراد الم ق دارد مع ماري دي مي المراز خري المراز خري المراز در المرز المرز المرز المرز المرز المرز المرز المرز $\frac{1}{2} \frac{1}{2} \frac{1}$ ين كنوند وراجل تربين براجن الشركال مرتب في الما جرار كار وتد ترا المعر 1235 5462 - 62 11 02 11 12 11 12 10 10 - 60 1 23 - 0 0 0 K $\frac{\partial \psi}{\partial t} = \frac{\partial \psi}{\partial t} =$ 12-1-201. Cicporieby of J. D. - 032 2.6.98 ي i Radan i e di je i cilili i cililita e a cice di a cililita

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اجن الله ساما كرم ون مو و و م ما كرم من 80 Exidence and Ranger i regime with the فورا کال کاسلیر منظر بنا ، اس تا ماند ان ماند. ادار فر ر مع مو م بیس اس مر مع ای در ان میں ان می میں میں ان میں ملز میں میں میں نیاع ان میں الك از بو عليم والى رفعار فر مح ، بو مول حو الم مرازية والح control 23 Lachphi Goo & grad Unition of a During the first of the Rizer in the Rizer of Stand of Standing of the Standin مرة وديد . المحدوران المع عليه = 2 PSP من قارم كومون إرافلا ح استرائى محاصات ترابع سے قبوران این ور مراج الم i rection a long i ling a long i se dig i de long i se dig i de lo le se $\frac{1}{\sqrt{2}} = \frac{1}{\sqrt{2}} = \frac{1$ جرم من مروت فارور اور ناز ما مالی موان از تی مرد می جرم من حرق سی مرد می اور اور ناز ما می می از می از می برای سرس با بی المی المی الله مسل می از در الی مرحدی کی محد می الله مسل می المی الله مسل می الله مسل می الله م عالی مسرار BsB (ایجار ی الله را الله مسل می ای در الی مرحدی کی محد می الله مسل می الله مسل می الله مسل می الله مان بر المالي جريماني جرمين زوري الورشا بي - من رو من غري الورشا بي جريم زوري الورشا بي - حرى رو · period and and and a seturitary . min Auch Nic - 14203-4436866-1 mob-0315-5857410. جمع ت الموليس 11 الموليس 11 المو - brain war in the اس دناس نور المراد من المرقط

Ribling Ribling ساب جراما الم مرم - ما المولق الرف فارد ما ما در دور ا مرحد ا ۲۰۰ مردم در اس فرا مرد ا - رماز مرح الربيوه حوظی کم مل مول نجرم چن لف ذل حمال مماري في حق ما كو حران العيد المندى مكان مسرار توردنه می زدرری مسل خرجو دی - جر شر بشر به ا د كون مع لو برزم مرتبل المراب في بن . الد معان الرام م ما ه نیسی کے جو رائی ج ۔ الی دیج نے دیشی تنظر میں ان روپا زیل روپا را ا الحراري مسي في المراج مراج المراج المراج الحراري المراج المحراري the construction of the construction of the construction $\frac{1}{2} \left[\frac{1}{2} - \frac{1}{2} + \frac{1$ مرید هم ی معلی فری نیزی ی مزیر کرد می تر از مراج از مراجع نبری ی حقی ا مری در داری ایس مراجع با نبری برا از مراجع از مراجع من عال الرجلوماء مراحة من مراس عالي ال $\frac{1}{2} = \frac{1}{2} \frac$ Mary aller is we done by aller ر حن مر مد شای لواس محم بالک الجانی من دنی ج ر حن ساعارت عالم زرهم المرم الرابع ترتب مون الل

سریں رقب کو الکر چوڑہ ۔ ڈس یا لانے ا (1) a) > (1 a, 1 a, 1 a, 1) a a did in the 1 مر میں برم آیان در زیر کے اس انسیس اور اندا عدما کا d'éle de l'élégier Rice - Cores $\frac{1}{2}$ ما م محرد م لزش س الا الرضار جوار الحرابات ان کالیا- « میل أرحاج م - أس مرت من الم عند من من من مراب مر ب كولوك عالى وبالنبر _ 2 - 7 مرزعين مي مير سوري فرح كار تحي لدانته تري ريا واطريب عمر رو - این اندی کرد بر در اخرا مرار می و ان ا ورفى بين فين تحر ليوس عاد الاندال وحلم د المت في مرامكر من والن الله 2 . المنا مر الرار الر- ليلا ر مس مربع لا مرور رض المربي العار في قرم المربي أو مربق العربين ا المرائز بما لعاظ حود كم لولس بن شرمال امر زنيك عر نا حقي قدل 2. يسرر المدين - 2 باب حولات لوس سرالالر منداس في مركم فكرن - لي لرما - ما المراصل المراصل المراصل و لول جوم سنع مروز من - أنا يورون بن ديسا مح من فرمر رس ار تشمر رث مير الألمان لف م مر مسرا بیل ا ۔ ج N Bitmil TAK 15/11/2019

به ولالی ا 17 A.S. 日の方 No que Ri الم 10 01 مر لطور ما رد مها را تال شوید نرخ ن الحرال) ولي من مراس ما بین سرره با به اولی شانون را با بر جا - لا سلا مسم فرج فازم الحيارج كمارد تحد الأل 03339714838 3-58 510 85 ζ 0315 うちのからうないとう いうしん ちのからい 日 : いいないない ちょうちょう

all Blie 17.10 (inters مداد واجعد في مال 21 ورض في ما وقت (00-11 / 15 me 1) إلى ال as it KOA - it and in the stranger in KOA - I will be in تم والمرضرة فأوبيبوه معطى معاريزي عريم عرد الماند Jals ? ب الت KOA = بعنه الحدارة الجانف العربي عندور جراف -من بس وجرد في في فرف بر الما الالم عن شظر حاكو بحان بر كادد كماند و فاصد المغرب خالات ما كم فال کے بنیٹ مردی نے کیا ہے کہ میں سے سوارت کے بات کا ایسکی دنیاد موجد مع من نے اور اکم بر تشرق الجد کو تے watsop x, تعني جما في تنكن ساجد كو معمد من . و azorie فري ال مى باجرائيس مراس دودات ديمات الذانيان كاردكان فاصدر المعترد وفاكر بربرق بالإجوز و المربع الم مل ما الم ال يتاب ما المرحد ريره ومن حولات ما فالدي الأرس Siber J. Ren is in Elinger July of Ingle Jil buy to all distribit a miles into oge - de DSP ENLE 12 - Or w Sel 23. 7 2 1 0 4 15 ت نوشه من لا تر اسی زنا و میں جنا - مل جا - مل جا ما ف کتر اف psp-lis in white inter out of the all one of 12 blog watsape on - We when so a colo Bi-lip will in a Co wastap 1. W 13. 6 i de incons More in the solo of the state of the state Rice wentsup in asi of watsup & / Alge BED 2576: بنى جرمان سروة م الأوان بالقالو معالم 2005 La La Dis ver colo DSP - La la & Liston and یے متعدی توریش کا دو دندی کا حکم مرا ، مرتور کا دندی کو سے ، ۵ در دور اطرو لیک متم ما ومو ما وفر مرا عما . تعلد موجر العادي المراب المول الا المراجر sit permanded expribility in the aleghing r Sml and that RJ. K.Ks mmpi Ki 12

KOA (53, 2: 6.1. 294 06. سان ازال مس Íchi الم- م وجرد " الرس م تشر ا 2 Julis S. ر ADA مسال کر من وزر می -ورا في مى راندرا المقر - مراح و الجر الله ع دى . Me in firme apping the all the مى المنظر من محسب موارم » Mec الأطار عا In do esti in the line is summerly il all ی ووری می شور شری کررس کی - اور کیارس کی -طن السر ومي والي تون كر ما أس كوما طر تر بن ج حک المحارد مر مالع و رو ی ما مر و از قربی رے بط کا کہ آج biles Que USE all Sulpost aling of 2 Jean يم اس ما حل تعالى من - آب تسارة ز ادى س برلى HE INCR. CDHQ AIC AC WILL God. 14202-1313203 MIC 0334-8919297 Wike on lite In MB : 4 UN 2 1 [] in me 2 9 170-E (13, 6, 95)

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مشرس مرورها یم راحد اخطرے مرد اخرا کر اظرع دی کر اور اس محم مراحد محم مراح کے میران میں ایک میں ایک الم مل المح المحالي المحالي المراج الحالي والم م می شی می حق الم الم می والی نی زی زی ا معبر عرف محرف ورس في أنج المحسور الم Cillion Cilling and DSP es مرى زيادتى من يركى سى اس كا حل لمان من ا Hoded Hode 1 si and 374 pursel in 1 MOB-0345- 8859319 NIC : 14203 2040549-3 KI GRA BERECA and a start of the --- V 1 Li prov Him in Me got of with de

571-0877)12 21 3 C 1. J. it y \dot{j}_{j} ł ٥/ D 2 le 11 **1**... Alb P Dy: Cupich of Particle 11 11 1 1 ł

بان آدان أمين على عدي 28 ممار وكسيس MLE ورد KDA مرك ے سان کیا۔ کہ میں MLe وار KDA سیسال کری میں علرف سماند خرج بانو جو محواله مفرسه ملان 38 مور فرام - 10 - 22 جرم 20 3 عمل المن المريس الجر حراست زيرعفت معالجه بطور كار في كنشل لقسات كون مرزم 19 كر بوفت تربب المفرويل ملزم مالا سرور متر به ستروع كرم روره م مر مارد کما ندار زربر اعمو از ملزم سے باس طار حرم دو تھی وج س ساری معی کانی اسرار کے بار جر دیمی گار دی رزر کر در ج بنی سل ربع من اور برستور شرر شراب روب من مارد ما رو ا مال صاحب كومال كرم جولا با اور i-R حما عب مال بر دما اور يجوب ر خارج حسالي الم عمر الملم عمر المح مع الح رضال فان (R ما ص كو علزم في سلايا ، كم رسك سك مسارد مرم كومل درمت سلم موجود ی کوئی شخص مال کررہ جا ور تن کرتی ہے کہ اس دور ان سرر کو ج کال کا ، جس ف مرباس لو (میکر بر کرے جومندور و شخص سی ک بان جين كرمدى عن جوتمام موجود كان خسن كال بنر مايون مى ٣ رومان اک من جرمان با، جر میں از در مان جر میں از در مان از مساغر حف انجار BBZ ما منبر سر خما . اور مها تم بر زن بار بار محمد مال كرت مج الم جمل وحوك سے كي سرورا سان حريف في متى ہے كم حل وك حك س ا جازت و م . انجار ج ماجوب مس كما . كم كون كنسيس كوسمو اسلا سی معیج رولغا. اسکومیں رجازت بن مد مسکتان من دوران Ri صاحب انجارج موباس سكراور Rada فاحت كاراب كون في مرد م كو ينج 1 نه ما كنيم مو جس نه كها . كم و احمن البش كمو ل اجسس تلري ماريخ في كم مس (أن كونيسي ابن مارين ما ين عمر مال سرير مايوا الم حساف مرز الوكياكم من في رحمن الله وما ما سر كال تعمين في الم الم ما و الود تعي فلزهم (2.

شرر شراب مردس مغن اور کم روی معن که هر وسی بسی کسانفر حن الا ما بانی ريكادين بي . i-R صاحب لم ريكار در يسين كرني ما أبي .جراس ني بي . كم بينون من بي Ri حام بيون سي تركيز عليانو سريره خه والس ري منبرمائك كر Ri ما في كنيبل سا حداقيال كو والني ايب مرح في م كام جمس في والنس ايب لمبر تعكر حسك تشرير و في درو والنس ايب كري iR صاحب نے PZ ویڈ کوارٹر صاحب کو مال تر سے ملایا PZ حصاحب pomi cel . UT اس میں میں میں 28% متصب کا رو نسسترل 03414-7523869 العراب موجود من مالی الی الی In a in the second Con very by colo a Contract aler 20 2 all of a July Amencul 4 5 in Un Cri Allesteel Som Co 151 111.2019

5, 0, 10, 2, 47 (1, 1) 1, 10 0, 10 مرائل مرك س محرر مشاف ف مرب عدر ما ما مر دامين ACX سیال ور) جانے ی الحدر مح دی - بوف لار بر) در 11.3 AN - سال ر در مر ساردی مرادی سے دس سی - مرز میں تحد رسم اسرم حرف حومل مدر مر الم عد خرص سالے م کامل ما روی خداری سیمال کرے شام ے وقت عمر سری سی مسماع مسیر رہ الم المسور شرم المراح مناكر مصف وكالمسمين مرابسل غوز الرمالين مرجم مح مرور مح ط شرع از المح مرور الحارج كارد كا مرم زام المخر علاق والله من رضي الما وعامل in وال STURE KDAOS STORPER - WEIGO OF STOR ومع سرائي مراجم مراجم كالمري مرد مري تماني - مرمض وي كالمس ا 11 Ligo chis will whe pspice in ring Ringt مرافر فالموكا ومس الي المال المارد من من فا م in a split de ar a spin êle stra de la popula اور اج ما من تو من سال - مرس على عمل سرى ميا كا محص معامل کا وتر میں تنا ان فریدی و مسی ف ی مسی حمرون کری ہے کا میں ایک کے

9 gi 10 <u>...</u> 2019 05 > [,,, ist. 21 **1**]; ¢, メダ 2. ي الح علم ر ح د Allestee Dy Low B. (Police Racak 14 1

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ما _ عالى ! we kDA Sile MLC I way and server and حرّ س ظلوف سراحام دے رحاما امرسائل حرف الـ 80 كو كوفراعيرت في عبم الألزال لازد دولوم رضت بر تعر مود ملر 1HC intant الكيا . أكي لوح تخزار الم مرم ورفر ورو محوسلم عار عام انخار 7 طرد فرد فر ا 2 b 3 2 lim kDA 1 2 4 كو المنا فرا مو م خال ٥٥ الع الم م الم ستر بخا امر دلمها بر في الرف كالسي ارز بر السي صورتك الموقع مر الخر لين المري توهر تحر هر تحد سال هو المير المن هراي white 2 ج تھے اجما اللہ تو الم in a fer 12 50 -15<u>11</u>, 15 200 - 200 - 200 Plell 23 Jb 1313 Buris Nie-14203-6379832-31 343-9048L

184-60 KOA SIGNIC (JUNI CIN CIOR (S) زر س طرو جرح نازه ادر طرم سا حما مال فافاد در فرش المراي س مراماً م دے رضا کا - مرابع م مراری کارد کانتر زامی اعقری از کرم مزانی از ا مر محمر جرد الما - معرور من الله المحم تو يوت تعريز 100 جزائع (idic) illusion of the internation of the second of the se 1/2 / luin - i los 1/2 2/- @ Culi $\frac{1}{2} \int \frac{1}{2} \int \frac{1}$ مری الم میں خریرای اور می خص اس میں الم میں الم W/ مي مير وودر) مي واقع من ماواف مول - Q UW 105 15-19 en 196/1 - Angel City Real HJ12MLC NER UHC/Glin Ang Dell Nie- 14203 mob-0344-8153746

He He it it it it 2. 2019 Just In age $\left| \bigcup \right|$ (~ INDA La Ri 1: 1 100 il il in in h 5 Bor mar Me- 14202- 38338677 Mob - 0334 - 8685354 J. a.

05 19 36 in 34 Ne الأراقة لولس لأكل رمذ مرارمه و ۱۵ س عبر اد ان شهراد ب عرار من مرار آبار دیگر فی س کردن جبه سها خوان عبر الحاد د ما بال KOA الم ور مرز فراسف بالاراحي ribe is (ir نقل مطالق من 1 das MMPLICK 0SFIL-18 orwarded Rikk 18-11-19

لو س لادن 2/13/21/e 40 te 67.100 Sie 21/8 1/2014 (Ulibro (10 40 10 می صبر انکم اسر ان ال الطور ما دو انکارج مرج قرد بال KOA (روار برا ا 11/11/10/10 Sir لتقل مطالق onverded Alor mmPlku 21-71-18 Rikk 18-11-19 / č 3

John Ri TT is in مزن جناب عالی گرز رش می که سائل کنسیل مرح گارد کس تعظم می سال موجمد مقائم المرور لودخت عد 12 جمع برس لائن كرك لوراجي سے مذر لیے حون اطلاع ملی ۔ کہ آب با بدلسلہ آ کلو ، لڑ کی بیان ح د فتر محاص کرک ایجانگی و الانج بر مس دمتر محرص الم كرك لأدائم بهوا - وفتر جرد حماص في كرمين تسب يربع المجار 582 طريق بوا - ادر محصر كما لها بان سرع ال كر اوري مع كما، كم سرره موجى ، محوظل الزم ليارين ادر مر ع من كرنت بنايا هي . جرب اجواب سام من ا ىس بولون كما جو حفيمت بين أنكمون سے دينا جع وہ مس سان كرونيا - سخوس میں ایک دن اس محصوب کا این - نیالی کوجراب دولفا اس دوران بيل ن اصل حقائق بيل ن كرولغا جو مله ايك يوم قول الم بسی سماة سرره مودجی سے رحمن اللہ طحور نے بلج سنرین رود رو مربانیل میں تقے اور کار حکاند رہا زمان کے حوالے کے فیز ا الك لفن كرران مع لعر رحن الم عدم الخارج المره المؤارج ى زار سى سكر وايس ملزم ى بى شراية سردر والوحوا يرين موماس مساور دوماره حواله كرني كالدلى رقن انته انجارج في 2 ے حرد کی جع بی مسلم ، اسمار فی - مورد ہور اس عین نواد کی لیکن سائل اس مل ملک 28 رہو کی کہ میں کا من کر حال مرح کارد KDA

مقىر 33 معدما في مورا الما محال الم ولس ارش فرو آمد الروروانية العالم العالم الم فروم و التوقية ما الم الموقية الم محادد معرى المكلم بيسال مع ماضر أكرديك فريرى ورفردست يستى زم جرم فاب هوم ورفرد المحال مرارش صام سائل آمين علر المار وميانو مواد بستال مين موجود تما مرافرور بوق المراجر مرحد معز نافج سے مزرال فوں الحلاج علی مراق معلم انہ انہ انہ ہاں دسے دفتر جو ماعب کر حال الملاح مر ص حفر المل محمد برك مانه بو حرفتر المل ماها الج فر مين لا در المان دند الح ب Bed مي ملرش سوا امر محمد كما أمراحي دنيا بيان مير مع جش ميں مرين اور مير ميں كي در سال مير ن محمد مير الرام رفاية ج ، اور مير الله يتر من من على جراب من الله من جمعوم ميں بولومان جرحتف اننى الملحون وراجا ج ، وہ ميں بيان روں ما . مولد ميں المي دن إس جوئ ، التركماني لوجواب دون ميں مرحدان اصل حصالق سان كرون في جونا رتب فيم مين ملرف كر مين مسل و مسررة موجى مدرمان الله فارم في المريد عدد حرماً من الف فع اور ما روما روم بارزمان الما يوال مع المرين الما كعنه مرز المريد رحان الله الجل الجارج دومار الرخارد ماندر سے لے فی اور والی ملرحہ کی میں مسرق معدرہ كوحوال من مواسل من اور دومارة حوال أب أب على أحان الله بان. 2 8 2 ما حود من سام سبل ترمین عل 86 بولیس لدش زخ حمال طلب الخارد سنال ۱۹۵۷ فر مرجر ا المشيل درجواس كنده ما درخواس حرف به حرف درج بدر ناج مح مررص المرهاي الرجان يجاني احد بولين كو مدن كرين ك يوسس مين معروف . رحمان الله خود علر مر عالوان العر المر معدره وور الني 2 ما رد ما ندر بما رزمان علو غرو عدد الم من وماسل تحتصه مرك المي تحفة لعدوالين يستسال جار دو عدد في سكرين فعاشل كارد كما فتر سيرالله المرع رمى ن المتر ف طرف ت جوان العد بعين سميد م كو حوالم كت لعد أر فحريرى وقاعات موزنا فيم ما جاكر منتى در فواسك كنده كا و واليا كا دوملرم و لول مشال ٨٥٨ مر

المرساني جنه تعد معرض مناسب ماروال مرا در روس لف متره العران بالركو ار ال يولى . Ϋģ durio نقر بعانق المل محد Sir orwerded MM P.L Karall 15-11-2019 Rilck 18-11-19 Alled -MAB. W. Str •

