

28.04.2023

Appellant present through counsel.

Fazal Shah Mohmand, Additional Advocate General for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 15.06.2023 before D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

\*Mutazem Shah\*

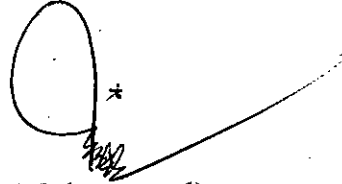


(Rozina Rehman)  
Member (J)

12.01.2023

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present and submitted copy of inquiry record consisting of 21 sheets, copy of the said record handed over to learned counsel for the appellant, who sought adjournment on the ground that he has not gone through the said record. Adjourned. To come up for arguments on 22.03.2023 before the D.B.

SCANNED  
KPST  
Peshawar



(Mian Muhammad)  
Member (E)



(Salah-Ud-Din)  
Member (J)

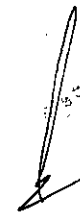
22.03.2023

Junior to counsel for appellant present.

Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

Learned Member Judicial (Mrs. Rozina Rehman) is on leave, therefore, case is adjourned to 28.04.2023 for arguments, before D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar



(Muhammad Akbar Khan)  
Member (E)

29.09.2022

Nemo for parties.

Muhammad Jan, learned District Attorney for respondents present.

Preceding date was adjourned on a Reader's Note, therefore, both the parties be put on notice for 05.12.2022 for hearing before D.B.



(Fareeha Paul)  
Member (E)

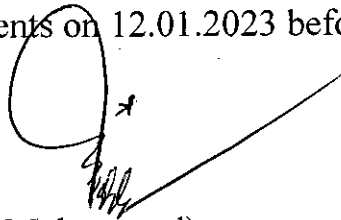


(Rozina Rehman)  
Member (J)

05.12.2022

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

Learned District Attorney stated that complete record of the inquiry has not been annexed by the respondents with reply/comments, therefore, time may be granted for production of the same. Adjourned. To come up for production of inquiry record as well as arguments on 12.01.2023 before the D.B.



(Mian Muhammad)  
Member (E)



(Salah-Ud-Din)  
Member (J)

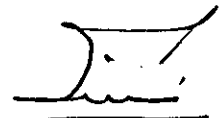
SCANNED  
K&T  
Peshawar

12.11.2021 Learned counsel for the appellant present. Mr. Lal Bahadar, S.I (Legal) alongwith Mr. Javed Ullah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 17.02.2022.



(Atiq Ur Rehman Wazir)  
Member (E)



(Salah-ud-Din)  
Member (J)

7-02-2022

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30-05-2022



Reader.

30<sup>th</sup> May, 2022

Learned counsel for the appellant present. Mr. Naseer ud Din Shah, Assistant AG alongwith Zewar Khan Inspector legal for the respondents present.

Learned counsel for the appellant seeks adjournment in order to properly assist the Court. Adjourned. To come up for arguments on 01.08.2022 before the D.B.



(Mian Muhammad)  
Member(E)



(Kalim Arshad Khan)  
Chairman

1-8-2022

Proper DB not available the case is adjourned to

29-9-2022



Reader.

06.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct; therefore, case is adjourned to 14.07.2021 for the same as before.

  
READER

14.07.2021

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Hidayatullah, S.I for the respondents present.


Respondents have furnished reply/comments. The appeal is entrusted to D.B for arguments on 04.10.2021.

  
Chairman

04.10.2021

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Hidayat Ullah, SI(Legal) for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Granted. To come up for arguments on 12.11.2021 before the D.B.

  
(Mian Muhammad)  
Member(E)

  
Chairman



04.12.2020

Mr. Shahzullah Yousafzai, Advocate, for appellant is present.

The concise statement of what has been agitated at the bar by the learned counsel representing appellant is that, the appellant was fired by awarding him major penalty without taking into consideration his plea submitted in response thereof. The proceedings were conducted without observance of the codal formalities. Since no time has been specified for which the penalty shall remain efficacious therefore, it is in violation of the Fundamental Rule 29, the order was stated to be void ab-initio, the entreaty made in the departmental appeal did not materialize hence, the present service appeal.

The points so agitated at the bar need consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 01.03.2021 before S.B.

Appellant Deposited  
Security Process Fee  
09/12/20

(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

01.03.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is on leave, therefore, the case is adjourned. To come up for the same before S.B on 06.04.2021.



  
Reader

Form- A

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 12783 /2020

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 23/10/2020                | <p>The appeal of Mr. Khaled Khan presented today by Mr. Shahzaullah Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>04/12/2020</u>.</p> <p style="text-align: right;"><br/>CHAIRMAN</p> |
|       |                           |  |

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

APPEAL NO. 12783/2020

**KHALID KHAN VS POLICE DEPARTMENT**

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| 3.    | Copy of reply           | B        | 6-7   |
| 4.    | Copy of impugned order  | C        | 8     |
| 5.    | Copy of appellate order | D        | 9     |
| 6     | Copy of complaints      | E        | 10-11 |
| 7.    | Vakalat nama            | F        | 12    |

**APPELLANT**

THROUGH:

  
**SHAHZULLAH YOUSAFZAI**  
**ADVOCATE**

Flat no 4, Upper Floor,  
Juma khan plaza near FATA secretariat,  
Warsak road, Peshawar  
0302-8578851



D

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

**APPEAL NO. \_\_\_\_\_/2020**

Mr. Khalid Khan Ex: Head Constable (Now Constable)  
Police Station Warai, Police Post Akhagram Dir Upper.

..... **APPELLANT**

**VERSUS**

- 1- The Inspector General Of Police Khyber Pakhtunkhwa, Peshawar.
- 2- The Regional Police Officer Malakand Region, At Saidu Sharif Swat.
- 3- The District Police Officer District Dir Upper.

.....**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 06/08/2020 WHEREBY MAJOR PENALTY WAS IMPOSED ON APPELLANT BY REVERTING HIM FROM THE POST OF HEAD CONSTABLE TO THE POST OF CONSTABLE AND AGAINST THE APPEALTE ORDER DATED 07/10/2020 WHEREBY THE APPEAL OF OF APPELLANT WAS REJECTED ON NO GOOD GROUNDS.**

**PRAYER:**

That on acceptance of this appeal the impugned orders dated 06/08/2020 and 07/10/2020 may kindly be set aside and the respondents may kindly be directed to restore appellant on his original post of head constable with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

Brief facts giving rise to the present appeal are as under:

- 1- That appellant was initially appointed as constable in respondents department and was later on confirmed as head constable and since then appellant is serving respondents department quite efficiently and up to the entire satisfaction of his high ups.
- 2- That appellant while posted as head constable in police post akhagram was charge sheeted vide charge sheet dated 03/06/2020, whereby baseless allegations were leveled

against appellant. Copy of charge sheet dated 03/06/2020 is attached as annexure .....A.

3- That appellant filed a detail reply to the above mentioned charge sheet and denied all allegations leveled against the appellant with solid proofs. Copy of reply is attached as annexure.....B.

4- That thereafter the respondents issued the impugned order dated 06/08/2020 whereby major penalty was imposed on appellant, by reverting him from the post of head constable to constable, without considering the plea of appellant. Copy of impugned order dated 06/08/2020 is attached as annexure ..... C.

5- That feeling aggrieved from the above mentioned impugned order the appellant filed departmental appeal before respondents no.2 but the departmental appeal of appellant was also regretted vide impugned appellate order dated 07/10/2020 on no good grounds. Copy of impugned appellate order dated 07/10/2020 is attached as annexure.....D.

6- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

**GROUND:**

A- That the impugned orders dated 06/08/2020 and appellate order dated 07/10/2020, whereby major penalty of reversion was imposed on appellant, are against the law, facts and norms of natural justice hence not tenable in the eye of law and liable to be set aside.

B- That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

C- That the main allegation leveled by the respondents in the charge sheet is that the appellant had contacts with timber smugglers due to which smugglers succeeded in smuggling 4 laden vehicle of timber. But it is important to mention here that there is a permanent check post of police on dir chitral road at akhagram where two constable performed duty 24 hours, further more there is also a forest post near police post where forest guard performed duty for the sole purpose to not allow smuggling of timber. So the allegations leveled against appellant are baseless and if the same are true why

the respondents did not proceed against the in charge of the post as well as those constables who were present and performed duty on check post at the relevant time.

D- That it is also pertinent to mention here that two complaints were filed by aggrieved parties one to assistant commissioner warai and other to in charge of police post akhagram for redresser of their grievances and both were marked to appellant for contacting parties to appear before the authorities, hence the appellant contacted the parties on their cell phone and later the respondents used that data for issuing the impugned order. Copies of complaints are attached as annexure.....E.

E- That it is also pertinent to mention here that no inquiry has been conducted by the respondents that whether the persons with whom the appellant has contacted are timber smugglers or not, further more no FIR has been registered against any person to established that who were the smugglers who smuggled four laden vehicle of timber with the connivance of appellant.

F- That appellant is neither the in charge of the concerned police post neither he was present in the check post at the relevant time .

G- That no regular inquiry has been conducted by the respondents which is mandatory under police rules 1975 before imposing major penalty.

H- That no show cause notice has been issued to the appellant before issuing the impugned order.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 21.10.2020

4

APPELLANT

Rm  
Khalid Khan

THROUGH: SH  
~~SHAHZULLAH YOUSAFZA~~  
K & C  
KAMRAN KHAN  
ADVOCATES

CHARGE SHEET. *Annexure - A - (5)* <sup>78</sup>  
*Date* 3-6-

I Mian Nasib Jan PSP, District Police Officer, Dir Upper, as competent authority, hereby charged you **Head Constable Khalid Khan** while posted in PP Akhagram:

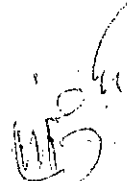
- 1) An enquiry was initiated against SI Sher Ali Khan incharge PP Akhagram, on his involvement with timber smuggling and a charge sheet vide Memo: no. 1319-20/SB, dated 06.05.2020 was issued against him.
- 2) During course of enquiry it was found that you was found involved with timber smugglers, also reported that you have links with the smugglers.
- 3) There was a chance of apprehension of timber on 04.05.2020, as (04) vehicles laden with timber were proceeding towards Akhagram but due to your links timber mafia succeeded in the ill intentions on 04.05.2020.
- 4) All above circumstances clearly speaks that you have links with timber mafia and your mala fide role has been provided from the enquiry report of DSP Headquarters, Upper Dir, so this amounts a gross misconduct on your part.

2. By reason of the above, you appear to be guilty of criminal act and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Rules 1975.

3. You are therefore required to submit your written reply within 07 days of the receipt of this charge sheet to the enquiry Officer.

4. Your written reply, if any should reach to the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case the ex-parte action shall follow against you. Intimate as to whether you desire to be heard in person or not?

6. Statement of allegation is enclosed.

  
(MIAN NASIB JAN) PSP  
District Police Officer,  
Dir Upper.

No. *1609-10* /SB, Dated Dir Upper the *3* /06/2020.

1. The Enquiry Officer for initiating proceeding against the accused official under Police Rule, 1975.
2. Copy to **Head Constable Khalid Khan** while posted in PP Akhagram.



کمیٹی پر ایمان سے لوڈ کیا گیا ہے اور اس سے منگنے سے اور اس سے کسی قسم کی معاونت کی سے نام  
انڈیز میں تیار ہر جگہ بیان دے گا کہ وہ کیا چیزیں اس میں شامل ہوں گی اور ان کے حوالے سے  
ہوں اور پھر یہ ایمان کی حق کو کسی قسم کی روایت نہیں ہے۔

افسوساً اس وقت کا یہ سبب جاری کر دیا گیا ہے کہ اس کا اردو الٹی خالص کرنے کا  
کا درجہ رکھتا ہے۔

0301  
8085671 -

Ram  
HC PP A. )  
10-06 : 20

OFFICE OF THE  
DISTRICT POLICE OFFICER,  
UPPER DIR  
\*\*\*\*\* C-8  
ORDER

This order is passed on the Departmental Enquiry conducted against HC Khalid Khan while posted in PP Akhagram.

1. An enquiry was initiated against SI Sher Ali Khan, Incharge PP Akhagram, on his involvement with timber smuggler and a charge sheet vide memo No. 1319-20/SB, dated 06.05.2020 was issued against him.
2. During course of enquiry that you was found involved with timber smugglers, also reported that he has frequent contacts with the smugglers.
3. There was a chance of apprehension of timber on 04.05.2020, as (04) vehicles laden with timber were proceeding towards Akhagram but due to his links timber mafia succeeded in the ill intentions on 04.05.2020.
4. All above circumstances clearly speaks that he has links with timber mafia and his mala fide role has been provided from the enquiry report of DSP Headquarters, Upper Dir. So this amounts a gross misconduct on his part.

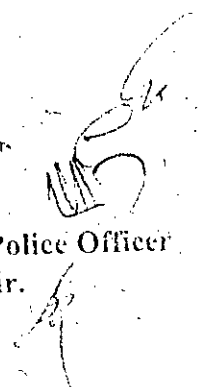
In order to initiate proper Departmental Enquiry, Charge Sheet and Statement of allegations were served upon him. Mr. Muhammad Ijaz Khan, SDPO Dir was appointed as Enquiry Officer. The Enquiry Officer in his finding report stated that the defaulter Officer is found liable/ guilty and recommended him for appropriate punishment.

On the receipt of the finding report and other connected papers the same were perused. His reply to Show Cause Notice was also perused, which was not found satisfactory. The above named defaulter officer was called in Orderly Room and heard in person but he could not satisfy the undersigned, his guilt has been proved beyond any shadow of doubt. Therefore, in exercise of powers vested to the undersigned under Police Efficiency and Discipline rule, the defaulter HC Khalid Khan is hereby awarded major punishment i.e reverted to his substantive rank as Constable with immediate effect.

Order announced.

OB No. 433

Dated: 06/08/2020.

  
District Police Officer  
Upper Dir.





38

D-9

**OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND  
SAIDU SHARIF SWAT.**

Ph: 0946-9240381-88 & Fax No. 0946-9240390  
Email: dlemalakand@yahoo.com

**ORDER:**

This order will dispose off appeal of Head Constable (now Constable) Khalid Khan of Dir Upper District for restoration of rank as Head Constable.

Brief facts of the case are that a departmental enquiry against HC Khalid Khan No. 406 was conducted while posted to Police Post Akhagram. An enquiry was initiated against SI Sher Ali Khan Incharge Police Post Akhagram on his involvement with timber smuggler and charge sheet Memo: 1319 -20/SB, dated 06/05/2020 was issued to him. During the course of enquiry he was found involved with timber smugglers, also reported that he had frequent contacts with smugglers. There was a chance of apprehension of timber on 04/05/2020 as (04) vehicles laden with timber were proceeding towards Akhagram but due to his links timber mafia succeeded in the intention on 04/05/2020. All above circumstance clearly speaks that he had links with timber mafia and his mala fide role has provided from the enquiry report of DSP Hqrs, Upper Dir. So this amount was gross of misconduct on his part. In order to initiate proper departmental enquiry, Charge Sheet and statement of allegations were served upon him, and the then SDPO Dir was appointed as Enquiry Officer. The Enquiry Officer in his finding report stated that the defaulter officer was found liable / guilty and recommended him for appropriate punishment. On receipt of the finding report and other connected papers the same were perused. His reply to Show Cause Notice was also perused, which was not found satisfactory. The above name defaulter officer was called in orderly room and heard him in person but he failed /could not satisfy the then DPO, his guilt had been proved beyond any shadow of doubt. Therefore, the then District Police Officer, Dir Upper has awarded him major punishment i.e reverted to his substantive rank as Constable with immediate effect vide his office OB No. 633, dated 06/08/2020

He was called in Orderly Room on 30/09/2020 and heard him in person. The appellatant could not produce any cogent reason. The Police duty is to eradicate crimes from the society not to cooperate with the outlaws. He rather than to identify the criminal has provided them shelter for escape. Therefore, His appeal is hereby filed.

Order announced.

OFFICE OF THE DPO  
By: 5593  
Date: 2/10/2020

OD si/EC

FOR necessary action plz

Regional Police Officer,  
Malakand Region, Saidu Sharif Swat  
Naqi\*

No. 9464 RE,  
Dated 07/10 2020.

DPO Dir U  
08/10/2020

OB No. 817A  
08/10/2020

Copy of above for information and necessary action to District Police Officer, Dir Upper with reference to his office Memo: No. 4476/EB/ Application dated 09/09/2020. Service Roll, Fauji Missal and enquiry file of the above named Officer are returned herewith for record in your office.

\*\*\*\*\*  
Encls: S.Roll + F.Missal containing enquiry paper.

الجلال والاکرام

(نام)

E-16

0315-9048799

123

(سوال الہم)

محمد رمضان ولد محمد گل خان ساکن اہل...

ذوق استیلا... ہندوستان...

محمد...

ذوق استیلا

میں نے... محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

محمد گل خان... اہل...

صاحب واپس اپنی

دفعہ شمار قاضی عدالت

مقام عدالت و قاضی صاحب نے اصرار کیا ہے

9048799

نام

مقام عدالت و قاضی صاحب نے اصرار کیا ہے

9069721

جناب عالی! یہ مسئلہ الیم بید کا ہے

760000 روپے خریدا تھا

یہ مسئلہ الیم بید کے مطابق ہے

1300000 اصرار ہو گیا ایک دکان کو بھیج دیا گیا

یا علی کے فروخت کیا اور باقاعدہ اسٹاپ

مسئلہ الیم بید کو سب سے اول خان کے پاس

یہ کہ کل رقم دکان سے ملے 760000 روپے خریدا گیا

540000 روپے فنانس

کہ وہاں سے سب سے اول خان کے فروخت کیا گیا

مسئلہ الیم بید کے دست سے

یہ کہ کل رقم دکان سے ملے 760000 روپے خریدا گیا

VAKALATNAMA

(12)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

\_\_\_\_\_ OF 2020

Khalid Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Police Deptt  
~~EDUCATION DEPTT:~~

(RESPONDENT)  
(DEFENDANT)

I/We Khalid Khan

Do hereby appoint and constitute **SHAHZULLAH YOUSAFZAI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2020

RmS  
CLIENT(S)

ACCEPTED  
**SHAHZULLAH YOUSAFZAI**

&

K  
**KAMRAN KHAN**  
ADVOCATES

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

Service Appeal No. 12783 of 2020

Khalid Khan Constable, Dir Upper.

..... (Appellant)

Versus

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

11. The Regional Police Officer, Malakand at Saidu Sharif Swat.

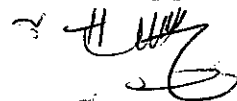
12. The District Police Officer, Upper Dir

..... (Respondents).

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| 3             | Affidavit           | -                | 5            |
| 4             | List of bad entries | A                | 6            |

  
**SI Legal,**  
**Dir Upper.**



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

Service Appeal No. 12783 of 2020

Khalid Khan Constable, Dir Upper.

..... (Appellant)

Versus

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Malakand at Saidu Sharif Swat.
3. The District Police Officer, Upper Dir

.....(Respondents).

**PARA WISE REPLY BY RESPONDENTS.**

Respectfully Sheweth :

Preliminary objections:

1. That the instant service Appeal is not maintainable in the present form and liable to be dismissed.
2. That the Appellant has got no cause of action and locus standi to file the instant Appeal.
3. That the Appellant is estopped due to his own conduct.
4. That the Appellant has concealed the material facts from the Honorable Service Tribunal.
5. That jurisdiction of this Honorable service Tribunal has wrongly been invoked.
6. That the Appeal is bad due to mis-joinder and non-joinder of necessary parties.
7. That the Appeal is barred by law & limitation .

**ON FACTS.**

- 1) Correct to the extent that the appellant was employee of respondent department but during service his performance was not up to mark. Annex bad entries list.
- 2) Incorrect During his duty time appellant was found links with timber smuggling on 4.5.2020 four vehicles laden

with timber were proceeding toward Akhgram Police Post but due to his links with timber Mafia, Smugglers succeeded in their illegal smuggling.

- 3) Incorrect the Appellant was charge sheeted and provided full opportunity but he failed to provide solid grounds in his defence.
- 4) Incorrect, the Appellant was reverted according to the rules due to his links with timber Mafia which is a gross misconduct on his part.
- 5) Pertains to the record. Departmental Appeal of Appellant was not based on cogent grounds, hence rejected with speaking order.
- 6) The Appellant has wrongly challenged the legal and valid orders of respondents through unsound minds.

### **GROUND.**

- A. Incorrect, the orders of the respondents department are legal and in accordance with rules because the appellant has committed gross misconduct i.e having deep in links with timber Mafia resultantly four laden vehicles were passed through the check post during duty time of appellant.
- B. Incorrect, the Appellant has been treated in accordance with law and rules by the respondents department and no rights of the appellant have been violated.
- C. Incorrect, the same allegations were also leveled against the Incharge of the check post and inquired through proper departmental proceeding but the one and only appellant was found in links with timber mafia which leads him to major penalty.
- D. Incorrect the appellant is showing bogus application/complaints in his defence the said applications are not been forwarded by the magistrate nor by any other authorized officer.
- E. Incorrect, the appellant cell phone CDR was checked which reveal that he has contacted many times with smugglers resultantly the smugglers escaped with the laden vehicles.

smugglers resultantly the smugglers escaped with the laden vehicles.

F. Incorrect, the smugglers escaped from the clutches of law due to his links of appellat.

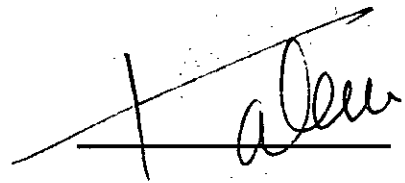
G. Incorrect a proper departmental inquiry has been conducted by the respondents department.

H. Incorrect, a preliminary Inquiry was conducted against the appellat whereupon a charge sheet has been issued to the appellat.

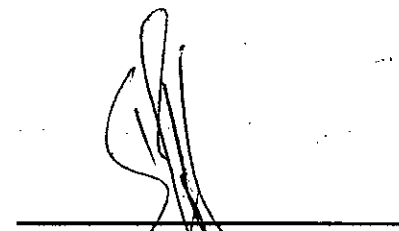
Prayer.

Keeping in view the above facts and reasons, it is humbly prayed that the appeal being not maintainable may kindly be dismissed with costs, please.

1. Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

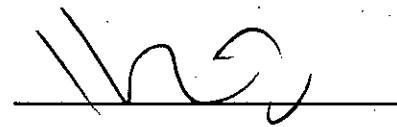


2. Regional Police Officer,  
Malakand at Saidu Sharif, Swat.

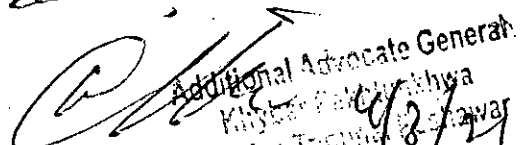


Regional Police Officer,  
Malakand Region,  
Saidu Sharif, Swat.

3. District Police Officer,  
Upper Dir.



vetted subject to correction  
attachment of all Annexes if any  
and affidavit and further directed  
to Annexes all record etc. Inquiry to  
Annexed.



Additional Advocate General  
Khyber Pakhtunkhwa  
Service Tribunal Peshawar  
4/2/24



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

Service Appeal No. 12783 of 2020

Khalid Khan Constable, Dir Upper.

..... (Appellant)

Versus

4. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
5. The Regional Police Officer, Malakand at Saidu Sharif Swat.
6. The District Police Officer, Upper Dir

..... (Respondents).

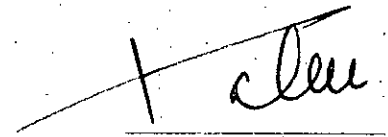
**Power of Attorney**

We, the undersigned do hereby authorized Adalat Khan, SI Legal to appear on our behalf before the honorable Court in the cited above case on each and every date.

He is also authorized to file para wise comments/ reply, prefer appeal and to submit the relevant documents before the court.

**Respondents:**

1. Provincial Police Officer, KPK.

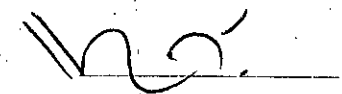


2. Regional Police Officer, Malakand.



**Regional Police Officer,**  
**Malakand Region,**  
**Saidu Sharif, Swat.**

3. District Police Officer, Upper Dir.



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

Service Appeal No. 12783 of 2020

Khalid Khan Constable, Dir Upper.

..... (Appellant)

Versus

7. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
8. The Regional Police Officer, Malakand at Saidu Sharif Swat.
9. The District Police Officer, Upper Dir

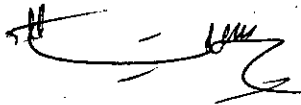
.....(Respondents).

**Affidavit**

I, Adala Khan, SI Legal do hereby solemnly affirm and declared that the contents of para-wise reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

DEPONENT

SI Adalat Khan, Upper Dir.

Y 



**OFFICE OF THE**  
**SUB DIVISIONAL POLICE OFFICER,**  
**CIRCLE DIR DIR UPPER.**

To: The Worthy District Police Officer,  
Dir Upper.

No 1361 /SB Dated 4/7/2020

Subject: **DEPARTMENTAL ENQUIRY AGAINST HEAD CONSTABLE**  
**KHALID KHAN WHILE POSTED IN CHECK POST**  
**AKHAGRAM PS WARI.**

Memo:

Kindly referred to your good office diary No. 1609-10, dated 03/06/2020. The enquiry report is the out come of elaborate enquiry into the following allegations against HC Khalid Khan while posted in check Post Akhagram PS Wari, Dir Upper.

**ALLEGATIONS**

- 1) In enquiry was initiated against SI Sher Ali Khan in-charge PP Akhagram, on his involvement with timber smuggling and a charge sheet vide memo No. 1319-20 /SB, dated 06/05/2020 was issued against him.
- 2) During course of enquiry it was found that the defaulter official was found involved with timber smugglers, also reported that he his links with the smugglers.
- 3) There was a of apprehension of timber on 04/05/2020, as (04) Vehicles laden with timber were proceeding towards Akhagram but you to his links timber Mafia succeeded in the ill intention on 04/05/2020.
- 4) All above circumstances clearly speaks that he his links with timber Mafia and his mala fide role has been provided from the inquiry report of DSP HQr, Upper Dir, so this amounts a gross misconduct on your part.

The competent authority worthy DPO Dir Upper desired the undersigned as enquiry officer. The defaulting HC was communicated. The charge sheet along with summery of allegations his statement also recorded in writing with cross examination. He was provided ample opportunity of personal hearing before the enquiry officer. The statement attached here with the quoted enquiry.

(2)

(2)

- 1) The undersigned called the defaulter HC Khalid Khan he was personally heard, recorded his statement questioned him with cross examination placed on file.
- 2) All the relevant officials were having also summand heard, recorded their statement placed on file.
- 3) preliminary enquiry as well as CDR of the defaulter HC Khalid Khan obtained, observed and found that the defaulter HC Khalid Khan have links with the smugglers and involved with timber smugglers.
- 4) Due to his links with timber Mafia, the smugglers succeeded in the ill intention on 04/05/2020 and smuggled timbers on Akhagram Check Post.
- 5) The above circumstances clearly speak and proved that the defaulter is guilty of the commission of offence that's links with timber Mafia and smuggling of timber.
- 6) The entire relevant document, statements recorded CDR and photo copy preliminary enquiry conducted by DSP HQr is attached here with for evidence.

*Reverted to his  
Substantive  
Rank as  
P.C*

RECOMMENDATIONS

It is therefore requested that the defaulter HC Khalid Khan is found guilty for the charge level against him therefore, he is recommended for suitable punishment if agreed.

Sub Divisional Police Officer,  
Cricle Dir.

(3) CHARGE SHEET.

S.No. \_\_\_\_\_  
Date \_\_\_\_\_

I Mian Nasib Jan PSP, District Police Officer, Dir Upper, as competent authority, hereby charged you **Head Constable Khalid Khan** while posted in PP Akhagram:


- 1) An enquiry was initiated against SI Sher Ali Khan incharge PP Akhagram, on his involvement with timber smuggling and a charge sheet vide Memo: no. 1319-20/SB, dated 06.05.2020 was issued against him.
- 2) During course of enquiry it was found that you was found involved with timber smugglers, also reported that you have links with the smugglers.
- 3) There was a chance of apprehension of timber on 04.05.2020, as (04) vehicles laden with timber were proceeding towards Akhagram but due to your links timber mafia succeeded in the ill intentions on 04.05.2020.
- 4) All above circumstances clearly speaks that you have links with timber mafia and your mala fide role has been provided from the enquiry report of DSP Headquarters, Upper Dir, so this amounts a gross misconduct on your part.

2. By reason of the above, you appear to be guilty of criminal act and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Rules 1975.

3. You are therefore required to submit your written reply within 07 days of the receipt of this charge sheet to the enquiry Officer.

4. Your written reply, if any should reach to the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case the ex-parte action shall follow against you. Intimate as to whether you desire to be heard in person or not?

6. Statement of allegation is enclosed.

  
(MIAN NASIB JAN) PSP  
District Police Officer  
Dir Upper.

No. 1609-10 /SB, Dated Dir Upper the 3 /06/2020.

1. The Enquiry Officer for initiating proceeding against the accused official under Police Rule, 1975.
2. Copy to **Head Constable Khalid Khan** while posted in PP Akhagram

(4) DISCIPLINARY ACTION. (4)

I, Mian Nasib Jan District Police Officer, Dir Upper, as competent authority, is of the opinion that you **Head Constable Khalid Khan** while posted in PP Akhagram, have rendered him liable to be proceeded against departmentally as you have committed the following acts/omission as defined in Rule-2 (iii) of Police Rule 1975.

STATEMENT OF ALLEGATION.

Whereas, **Head Constable Khalid Khan** while posted in PP Akhagram:

- 1) An enquiry was initiated against SI Sher Ali Khan incharge PP Akhagram, on his involvement with timber smuggling and a charge sheet vide Memo: no. 1319-20/SB, dated 06.05.2020 was issued against him.
- 2) During course of enquiry it was found that the defaulter official was found involved with timber smugglers, also reported that he has links with the smugglers.
- 3) There was a chance of apprehension of timber on 04.05.2020, as (04) vehicles laden with timber were proceeding towards Akhagram but due to his links timber mafia succeeded in the ill intentions on 04.05.2020.
- 4) All above circumstances clearly speaks that he has links with timber mafia and his mala fide role has been provided from the enquiry report of DSP Headquarters, Upper Dir, so this amounts a gross misconduct on your part.

2. For the purpose of scrutinizing of the said accused with reference to the above allegations, **Mr. Muhammad Ijaz Khan SDPO Dir** is appointed as the Enquiry Officer under the said Rules.

3. The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rule 1975 and shall provide reasonable opportunity of defence and hearing to the accused official, record its findings and make within fifteen days (15) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.

4. The accused official shall join the proceeding on the date, time and place fixed by the Enquiry Officer.

(MIAN NASIB JAN) PSP  
District Police Officer,  
Dir Upper.







(7)

(جاری)

(7)

کا سہارا ہے لوگ کا ڈھانچہ دیکھتے ہیں اور اس سے کسی قسم کی معاونت کی ہے (۲)

مذہب یا دین پر صرف بیان دینے کو نہیں دیکھا، یہ سب اہل اللہ کے لئے ہے۔  
ہوں اور غیر جگہوں کی جگہ کسی قسم کی روابط نہیں ہے۔

کچھ اسد کا ہے، جاری کردہ بلاؤں کے ساتھ ساتھ اس کا نام

0301  
8085071 -

Ram  
H.C. PP. A. Gram  
10-06-2020  
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پہلے سے وہاں سے جو کچھ آگیا ہے اس میں تبدیلی ہے؟  
دوسرا سہ ماہی 45 ماہ سے جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

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۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

۵ (20) 5 کو جو کچھ آگیا ہے اس میں تبدیلی ہے؟

آپ نے اس کے بارے میں 20/05 کو اطلاع دی تھی۔ میں اس پر اس وقت تک  
کوئی جواب نہیں دے سکا تھا۔ اب میں اس پر جواب دیتا ہوں۔

(8)

آپ نے اس کے بارے میں 20/05 کو اطلاع دی تھی۔ میں اس پر اس وقت تک  
کوئی جواب نہیں دے سکا تھا۔ اب میں اس پر جواب دیتا ہوں۔  
میں نے اس کے بارے میں 20/05 کو اطلاع دی تھی۔ میں اس پر اس وقت تک  
کوئی جواب نہیں دے سکا تھا۔ اب میں اس پر جواب دیتا ہوں۔  
میں نے اس کے بارے میں 20/05 کو اطلاع دی تھی۔ میں اس پر اس وقت تک  
کوئی جواب نہیں دے سکا تھا۔ اب میں اس پر جواب دیتا ہوں۔

20/05  
17/05  
20/05  
20/05

(9)

(9)

بیان اذکار و صلوٰت و نماز میں اقل کلام

نے یہ بات کہ بیان میں واضح کیا کہ صبح 4:30 کو صبح

3:00 بجے صبح 4 بجے نماز صبح 4 بجے نماز صبح 4 بجے نماز

3:00 بجے نماز صبح 4 بجے نماز صبح 4 بجے نماز

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3:00 بجے نماز صبح 4 بجے نماز صبح 4 بجے نماز

Handwritten signature

C.H.C. of Alhambra

0302-4339553

8-6-020

آپ کے غور سے جوئی اسکول میں تعلیمات ہے؟

میں جوئی اسکول میں تعلیمات ہے، پانچ ماہ سے تعلیمات ہیں۔

10  
مبلغ 5 لاکھ روپے جو ان میں موجود ہے 9

ج 4 ن میں جو ان میں موجود تھا اس میں 50000 تا 100000 کے  
مگر وہ نامزدی ڈیوٹی کا موجود تھا۔

آپ کو ٹیکس کے متعلق کوئی اطلاع مل چکی ہے

ج 4 ن جو 20000 کے ہیں ان میں سے جو ان میں سے  
پانچ لاکھ روپے کے لئے وہ تمام ڈیوٹی کی ہیکلٹ میں ہے

آپ کا ڈیوٹی پورے سوائڈنگ ٹیکس پر ہے یا  
مگر ان میں سے ڈیوٹی پورے سوائڈنگ ٹیکس پر ہے

ج 4 ن جو 20000 کے ہیں ان میں سے جو ان میں سے  
پانچ لاکھ روپے کے لئے وہ تمام ڈیوٹی کی ہیکلٹ میں ہے

آپ کو ٹیکس کے متعلق کوئی اطلاع مل چکی ہے

ج 4 ن جو 20000 کے ہیں ان میں سے جو ان میں سے  
پانچ لاکھ روپے کے لئے وہ تمام ڈیوٹی کی ہیکلٹ میں ہے

ادھر  
11  
51HC  
0802 4339553

بیان آذان کتبیل حنیفہ اللہ DSB سٹاف وارسی

کتبیل حنیفہ اللہ سٹیٹیم DSB سٹاف مقامہ وارسی نے بیان کیا کہ سورج 5/11  
کو بذریعہ سورس معلوم ہوا کہ کاروردرہ موسیٰ سے رات کو ٹیمبر  
سمٹت ہوئی چونکہ کاروردرہ سے LIB اہلکار کسی گھنٹے سے  
اور کسی بھی اطلاع کو ہم آئیں یہ شہرہ کرتے ہیں ٹیمبر سمٹت  
کی لسٹ میں ہے لوگت 11:55 AM سے یہ شروع ٹیمبر سمٹت کے بارے  
چوٹی ایوارڈ شہر علی صاحب ایڈیٹر کو بھی اطلاع دی کہ رات کو  
سہ بھی وقت ٹیمبر سمٹت ہوئی پھر میں نے وہی رات 10:00 AM  
LIB اہلکار کو اطلاع کی کہ آج دوڑیاں کر اس کا روردرہ آکر وہاں  
پہنچا ہے اور وہاں پر ٹیمبر سے لوڈ شدہ گاڑیاں آئیں گی پھر آج  
یا چوٹی ایوارڈ کو اطلاع دو LIB اہلکار وہاں بھارے بھیجے کیا کہ  
چوٹی ایوارڈ کے ٹیمبر بھی سینڈ کرے پھر میں نے ایوارڈ چوٹی ایڈیٹر  
شہر علی صاحب سے دونوں ٹیمبر LIB اہلکار کو میں نے سینڈ کر دئے پھر  
رات کو تقریباً 08:00 AM سے LIB اہلکار نے بھیجے ہوں پر کیا کہ ٹیمبر سمٹت  
والا آج ڈائمنڈ گنڈا ہے اور دوسرے گاڑی لوڈ شدہ سیلہاں سے  
بھرا ہوا ڈائمنڈ میں دوئے رکھا ہے پھر میں نے بجوقت 08:00 AM کو چوٹی  
ایوارڈ کو خبر دیوں تیار کیا کہ LIB اہلکار نے آج ڈائمنڈ گاڑی سیلہاں  
سے بھرا ہوا پیکر ہے اور آج ڈائمنڈ طرف مارا کہ صبح لگے ہے صبح دو  
گاڑی لوڈ شدہ سیلہاں سے واپس ہوئے پھر یہ سارے حالات واقعات کو ایوارڈ  
چوٹی کو لوگوں میں لگایا گیا پھر آج اور LIB اہلکار اسرار نے بجوقت 03:03 AM  
بھیجے گاں کیا کہ ٹیمبر سے لوڈ شدہ گاڑی عدو گاڑی ایڈیٹر سے طرف کورنگ مقام  
میان بابا ایڈیٹر کے پھر میں نے تقریباً 05:00 AM سے سورس سے ساتھ ڈالنے کرتے  
سورس سے تیار کیا کہ ٹیمبر سمٹت کے ڈرائیور اور مالکان نے سیلہاں سے لوڈ  
شدہ گاڑیوں کو سیرنگ طرف کو گئے گوڈام مقام کورنگ سے خالی کر کے

P.T.O.

محمد نوب 1174  
11/11/2011

دفعہ دینے میں اور آج - ٹھہر سکیں۔ ان خود صلہ کے سلسلے میں  
جو کہ کسی عمارت آدا کر رہی ہے یہی سہا بیات ہے جو کم  
درجہ اور صبح ہے

Handwritten signature/initials

صیغہ اللہ بند 534 مقصد DSB سٹاف ڈائری  
mob: 0315-9048102

- 1. آپ کے عہدہ سے DSB میں تعینات ہو چکے
- 2. میرا DSB میں تعینات کیا اور آپ نے تقریباً 2 ماہ پہلے -
- 3. آپ کو کیا تھا، گھبراہٹ ڈھونڈ کر لی (سہا بیات) کہ وہ یہ ہے
- 4. میں بھانہ وارٹی گھبراہٹ ڈھونڈ کر لی، سہا بیات دیا ہے۔
- 5. آپ نے ٹھہر کر ٹھکانے سے متعلق اطلاع کی اور اس کو روک چکے

میرے اطلاع صرف صبح 4 بجے وقت 9:55 پر ہی اطلاع کی گئی تھی  
 کہ وہی ہے کہ رات کو گھبراہٹ میں وقت ٹھہر کر ٹھکانے سے متعلق اطلاع  
 لی ہے ابھی تک - LIB میں جان بھاری کو ٹھہر کر ٹھکانے سے متعلق اطلاع کی گئی تھی  
 ہے میرے پاس والوں کو اطلاع دی ہے اور LIB والے ڈیڑھ گھنٹے کے بعد  
 قانون کی رہے ہیں۔

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صیغہ اللہ بند 534 مقصد DSB سٹاف ڈائری

سیارگان شہر و آب و ہوا

حیات علیٰ  
 مخصوص ہونے میں بازار افکارم گارڈ میں کھتہ ایک مربع ڈیڑھ  
 فٹ مربع ہے۔ صبح ۵:۰۰ کو صبح ۵:۰۰ رات ۵:۰۰ تک ڈیڑھ ڈیڑھ  
 اس کے بعد شہر ان شہر بازار ۱۴۹ اور ملک الوطنی ۳۶۶ کی ڈیڑھ  
 صبح ۵:۰۰ تک ہے۔ صبح اعلیٰ کی کھتہ میں ہے کالج کی  
 کیا ہے۔ سہ شہر و آب و ہوا کھتہ میں بازار افکارم میں  
 قومی آئین ہے۔ میں رات کو ڈیڑھ ڈیڑھ صبح ۵:۰۰ تک  
 کیا ہے۔ آج کی دوران ڈیڑھ ڈیڑھ میں کھتہ میں کھتہ میں  
 بازار افکارم قومی آئین ہے۔ صبح ۵:۰۰ تک ہے۔ صبح ان کی  
 ڈیڑھ ڈیڑھ دوران کھتہ میں کھتہ میں کھتہ میں کھتہ میں

سیارگان ۴  
 06-06-2020  
 عذر و آب و ہوا افکارم  
 گارڈ بازار افکارم

Mob # 03456759465

- ۱. گارڈ بازار افکارم میں آب و ہوا کھتہ میں کھتہ میں کھتہ میں کھتہ میں
- ۲. میں صبح ۵:۰۰ کو صبح ۵:۰۰ رات ۵:۰۰ تک ڈیڑھ ڈیڑھ
- ۳. آب و ہوا کھتہ میں کھتہ میں کھتہ میں کھتہ میں کھتہ میں
- ۴. میں صبح ۵:۰۰ کو صبح ۵:۰۰ رات ۵:۰۰ تک ڈیڑھ ڈیڑھ
- ۵. آب و ہوا کھتہ میں کھتہ میں کھتہ میں کھتہ میں کھتہ میں
- ۶. میں صبح ۵:۰۰ کو صبح ۵:۰۰ رات ۵:۰۰ تک ڈیڑھ ڈیڑھ
- ۷. آب و ہوا کھتہ میں کھتہ میں کھتہ میں کھتہ میں کھتہ میں
- ۸. میں صبح ۵:۰۰ کو صبح ۵:۰۰ رات ۵:۰۰ تک ڈیڑھ ڈیڑھ
- ۹. آب و ہوا کھتہ میں کھتہ میں کھتہ میں کھتہ میں کھتہ میں
- ۱۰. میں صبح ۵:۰۰ کو صبح ۵:۰۰ رات ۵:۰۰ تک ڈیڑھ ڈیڑھ

۱۱۷۴  
 ۲۸۶  
 عذر و آب و ہوا افکارم

بیان آذات خان بھادر LIB منصفینہ آخرا م عیالہ منصفینہ

خان بھادر LIB اہلکار نے بیان کیا کہ مورخ 5/1 کو صیف اللہ DSB نے

020

اہلکار نے فجر لوقت 10:00 بجے موبائل پر کال کی کہ آج

رات کسی کھم دقت کارو درہ سے لکھرف احمد ام سیلپران کی سہولت

PM

پوسٹنگی ہے۔ آپ معلومات کرنے پھر فجر سے آگاہ کر کے صیت  
آپ سے آج ہی وقت 4/3 بجے موبائل پر رات ہی موبائل سے موبائل

کے اس پیغام کو صیت نے وہاں پر انتظار کرنے لوقت 10:30 بجے

کارو درہ موبائل کی طرف سے دو عدد ڈائنے اور دو عدد ڈائنے

سیلپران سے لوڈ شدہ آکر ان ٹارگٹوں میں آتے ڈائٹ سیلپران  
سے لوڈ شدہ فہرہ ہوئے اور آتے ڈائٹ اور دو ڈائٹ لوڈ شدہ

واپس ہوئے۔ صیف اللہ DSB اہلکار نے فجر بتایا تھا کہ صیت

شرعی علی حاجہ اجمار نے چوٹی احمد ام کی موبائل ممبر دیتا ہوں ان کو اور

فجر نہ وقت الملاح دیا کرتے۔ صیف اللہ DSB نے فجر اجمار نے فجر

کی ممبر سیدھے میں نے سارے حالات واقعات کو اجمار نے

چوٹی احمد ام سے نوٹس میں لایا کیا۔ تو اجمار نے چوٹی شرعی علی جان نے

تیا۔ کہ میں نے نوٹس لکھنے والوں کو خبردار کیا ہے۔ کہ میں نے کوئی

LIB اہلکار دیکھی کہ بچے کو ایسے ساتھ تعاون کیا ہے۔ سو وہاں سے

بھر 02:00 بجے رات آئی ہو کر واپس چلا گیا ہے میرا بیان ہے

Dehau

جو کہ درست ہے

خان بھادر 279 LIB منصفینہ کارو درہ

موبائل نمبر 0345-8851953

بیان فریون کوئی نمبر گاؤں کو میں دیکھ رہی ہوں۔ اور یہ سب کچھ اور اس کے بارے میں۔



(15)

(15)

آپ کے عہدہ سے 18 ڈیڑھ سال کے بعد 9

میں تقریباً عہدہ ایک سال سے طبیعت 18 اگلا ڈیڑھ سال کے بعد 9

موجودہ 20 بجے کو آپ کو جس نے نمبر سٹافنگ کے متعلق اطلاع دی تھی 9

مجھے حنیف اللہ DSB اگلا کارہ اطلاع دی تھی -

آپ نے سلیپرز سے نوڈ شدہ گاڑیوں کو حود دیکھے ہیں 9

جی ہاں میں نے سلیپرز سے نوڈ شدہ 4 گاڑیاں جن میں 2 ڈائینا گاڑیاں اور 2 ڈائینا  
شامل تھے تمام دوڑیاں کر ایس کا رورڈ چھٹم حود دیکھے ہیں -

آپ نے جب سلیپرز سے نوڈ شدہ گاڑیوں کو دیکھا تو اس وقت آپ نے کیا نوٹ  
عملی اختیار کی 9

اس وقت میں نے کہا - AC گاڑیوں کو اطلاع دے گا کوشش کی گئی AC گاڑیوں

کاں اٹھ نہیں کر سکا اور پھر ڈیڑھ اندراج شدہ گاڑیوں کی کو بروقت اطلاع  
دی گئی - اطلاع دلا وہ میں نے اپنی ڈائینا گاڑیوں کو بروقت کوشش کی لیکن میں اس وقت  
میں واقع ڈائینا گاڑیوں کو اطلاع دے گا میں کا خیال ہے -

آپ نے جب یہاں چکی اطلاع شدہ گاڑیوں کی کو بروقت اطلاع دی تو ڈیڑھ اطلاع  
آپ سے کیا گیا 9

شیرلی گاڑی سے مجھے بتایا کہ میں سربراہی کثرت والوں کو عہدہ کرتا ہوں آپ  
سے فکر ہو جائے -

انور  
خان سجاد، 18 مقیمہ انڈیا، 11 پانچ

Mob. 0345 8851 953

AC







پرنسپل خان ای ایچ جی، جوئی اظہارِ اہم بیانی ہوں کہ مورخہ  
 04/06/2020 کو سلیپر ان کی سرٹیفکٹ کی اطلاع DSB ایف اے، صیف  
 اللہ سے موصول ہوئی تھی جس کی نسبت میں نے ایچ جی، خانہ  
 بزدی اظہارِ اہم و صلہ نقل LHC اور سوشل ایسپر خان خان  
 HCC کو ہر وقت ظہر کیا تھا کہ کارودہ سے آئے والی تمام  
 گاڑیاں چیک کی جائے۔ اور میں خود بھی جوئی غیر سٹاف میں  
 موجود تھا۔ اس دوران صیف اللہ <sup>انت 02:00</sup> DSB ایف اے  
 کی طرف سے کہا کہ بمقام ڈوٹریاں کراسنگ BNA ایف اے  
 سلیپر سے لوڈ ڈاؤن کی اشارہ دیکھ جو ڈر کیور سے  
 وہی ڈاؤن اور دو اور گاڑیاں واپس بھاگ کر بھول  
 کارودہ واپس چلے گئے اور وہ اب ہیں آئینے چوکنہ  
 اطلاع DSB ایف اے دی تھی اور دوسری اطلاع بھی  
 اسی DSB ایف اے کی طرف سے دی کہ گاڑیاں واپس  
 چلی گئی ہیں اور ان وہ ہیں آئینے۔ میں خود جوئی  
 آیا۔ اور ڈوٹریاں پر موجود ایف اے کی اہلٹ رہیں اور  
 گاڑیوں کی سرٹیفکٹ پتہ بیان کی ہدایت ہوئی اور اس  
 نسبت روزنامہ میں جو الہ سہ 35 روزنامہ 05/06/2020  
 جس طرح روزنامہ کھلی تھی۔ میں سپر اہم بیان ہے۔

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 SI-16-PP-A gram  
 17-06-2020

صحت مند رہنے کے لیے 05/05/2020  
 کو وقت صبح 05:00 بجے سے 06:00 بجے تک  
 پوسٹ اعلیٰ پوائنٹ پر اپنی راج و سید گل  
 HCL اور لیوی ایف، عیبت ڈیوٹی پر موجود رہے  
 کہ جو کئی ایف، راج شیریں خان نے دیکھی ہے HCL کو کارو  
 درہ سے کھڑے ہوئے کی اطلاع دیکھ کر جو HCL صاحب  
 نے فوج بھیجی ہے ہم نے تمام گاڑیوں کی چیلنگ کی ہے  
 اور اسل دوران ہم نے کئی گاڑیوں کو لکھ چیلنگ کر لیا  
 ہے اور اس بات میں کوئی عداوت نہیں ہے  
 کہ ہم نے سلیپر اس سے لوڈ گاڑیاں جیک پوسٹ  
 پر پارسی کی ہے اور نہ ہی مہری موجود ہے میں لکھی ہے  
 اسلئے کئی کئی ہم با رہا رہا ہے لکھ لکھ نہیں سہرا  
 بیان ہے

Saidullah

کنٹریل سپرائزر 1754

SPF 0346 9058578

۹ اذان کربل محمد الرکن ۳۶۶ منقذہ کا رد یا زرارہ کا کہہ  
در یاقین بیان کیا ہے فوراً ۵۵/۲۵۵۰ کو صرف کربل شہر کو اور  
۱۴۹ عطا تو ڈھونڈی یا ۵۵:۵۵ تا ۵۶:۵۵ بہت پار ڈھونڈی تھی  
دورانِ حج یا زرارہ محمد رکن میں شہر کے قسماً کی پٹریوں اور  
بے کسی قسم کی پٹریوں کو لوڈ ان لوڈ کرنے سے منع ہے  
اور کہیں اس پابندی کو اطلاع دے گا۔

Mohammed  
محمد الرکن  
۳۶۶  
۲۵

Date: 06-06-2020

# 03452293684