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may kindly be reinstated in service with all back benefits provided under the law.

Respectfully Sheweth:-

The facts pertaining to this appeal are as under:-

1. *That the appellant was the employee of Levy Force and after the merger of FATA into KP Province by virtue of 25th amendment, the service of Levies Force was merged into Police Department through KP levies Force Act, (No XXXV of 2019), r/w Rule III of Levies Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019 vide Notification dated 14/02/2020 of Worthy Secretary Home & Tribal Affairs, Government of Khyber Pakhtunkhwa (Copy of Notification dated 14/02/2020 is attached as annexure "A").*
2. *That after the above said notification, the rank of constable was given "BS 7A1" ^{to appellant} and assigned duty at Stadium Check Post Upper Kurram. (Copy of the posting order is attached as annexure "B").*
3. *That three persons of the locality namely Mustan Ali, Zameen Hussain & Hidayat Ali sons of Shaban Ali (brothers inter se) on some personal grudges with appellant*

3

made complaint to respondent No 2 against him in which they alleged that the appellant was dealing in narcotics and on the above said complaint the respondent No 2 without any probe took disciplinary action vide Office Order No 473 dated 04/02/2021 by appointing respondent No 3 as an Inquiry Officer and also charge sheeted the appellant vide Office Order No 474 dated 04/02/2021. (Copies of the Office Orders No 473 & 474 dated 04/02/2021 are attached as annexure "C" & "D" respectively).

4. *That after the above said order of respondent No 2 (annexure "D") the appellant recorded ^{his} statement on 09/05/2021. (Copy of statement is attached as annexure "E").*
5. *That on the above said orders of respondent No 2, the respondent No 3 (Inquiry Officer) submitted his report on 27/04/2021 to respondent No 2. (Copy of Departmental Inquiry Report is attached as annexure "F").*
6. *That after receiving the above said inquiry report of respondent No 3, the competent authority (respondent No 2) passed the impugned order "dismissal from service" of the appellant on 28/04/2021. (Attested Copy of order dated*

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28/04/2021 of respondent No 2 is attached as annexure "G").

7. That against the above said dismissal order of the respondent No 2, the appellant preferred departmental appeal to the appellate authority i.e. respondent No 1, who vide impugned order dated 30/08/2021, dismissed the same. (Copies of the departmental appeal and order of respondent No 1 dated 30/08/2021 are attached as annexure "H" & "I" respectively).
8. That being dissatisfied of the above said orders of respondents No 1 & 2, the appellant is filing the instant Service Appeal before this Honourable Tribunal on the following other grounds:-

Grounds:-

- A. That the impugned orders of the respondents No 1 & 2 dated 28/04/2021 & 30/08/2021 are illegal, arbitrary, perverse and also against the relevant rules and procedure, therefore, liable to be set aside.
- B. That the appellant rendered his service with full dedication, commitment and efficiently with entire satisfaction to his superior (competent authority) and during period of his

5

service no complaint whatsoever, filed/lodged against him and in this circumstances the punishment awarded to appellant by respondents No 1 & 2 was without any legal justification, therefore, the same is liable to be set aside.

C) *That the respondent No 3 (inquiry officer) in his report has mentioned the statements of complaint party, but did not appended/annexed the same alongwith his report, therefore, it can safely be presumed that inquiry officer has not recorded any statement of any person, more-so the statement of appellant has also not been recorded during inquiry proceeding. It is further submitted that no opportunity of cross examination has been given to appellant on the witnesses, if the statements were recorded by the respondent No 3 and in this respect the reliance is placed on 1987 PLC (CS) Page 868.*

D. *That in the light of above submissions, the inquiry has not been properly conducted by respondent No 3 as provided under Rule 6(ii) of Police Rules, 1975 and thus committed illegality by violating the ibid statutory rules, therefore, the impugned orders of respondents No 1 & 2 on the basis of departmental inquiry report were unjustifiable/unsustainable under the law and liable to be set aside.*

E. That the competent authority i.e. respondent No 2 has passed impugned dismissal order in a very hasty manner, because no independent findings/reasons was recorded by him on the inquiry report as law laid down by august Supreme Court of Pakistan in case reported PLD 1985 (SC) Page 290. It is also brought to the knowledge of this Honourable Tribunal that on 28/04/2021 the appellant submitted a compromise deed with the complainant party to respondent No 2 but he has not given any consideration upon the above said deed and passed the dismissal order, therefore, the impugned order dated 28/04/2021 of the respondent No 2 is nullity in the eyes of law and liable to be set aside. (Copy of the deed dated 28/04/2021 is attached as annexure "J").

F. That the complainant party mentioned above had not given any kind of direct or indirect proof in respect of involvement of appellant in dealing in narcotics alongwith their complaint to respondent No 2 or before inquiry officer (respondent No 3) and this important legal aspect has totally ignored by respondent No 2 while initiating disciplinary action against appellant and also at the time of passing the impugned dismissal order. It is further submitted that above said illegality has also been ignored/overlooked by respondent No 1 while deciding the

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departmental appeal of the appellant of the appellant, thus the respondents No 1 & 2 have not exercised their authority/power and jurisdiction in accordance with law.

- G. *That during the pendency of the departmental appeal, the complainant party namely Haji Mastan, Zameen Hussain & Hidayat Ali sons of Shahban Ali executed compromise deed on 04/08/2021 with appellant in which hey categorically stated that they made baseless allegations against the appellant in respect of selling narcotics, the appellant submitted above said copy of compromise to respondent No 1 but the same was not considered while passing the impugned order dated 30/08/2021 and this act/action of the respondent No 1 was arbitrary, perverse and illegal, thus the impugned order of respondent No 1 dated 30/08/2021 liable to be set aside on that score only. (Copy of the compromise deed dated 04/08/2021 is attached as annexure "K").*
- H. *That in the light of above submissions, the appellant has been condemned unheard by the respondentsⁱⁿ impugned actions/orders which is also against the principles of natural justice.*

8

I. That any other ground, which has not been specifically taken in the instant service appeal, may be argued at the time of arguments with the permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the impugned orders of respondent No 2 dated 28/04/2021 & order of respondent No 1 dated 30/08/2021 may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits provided under the law.

Dated:- 27/09/2021

محمد نواز
Appellant

Through:-

Asif Hameed Qureshi
Advocate Supreme Court

Certificate:-

It is certify that no such like Service Appeal has earlier been filed by the Appellant in this Honourable Tribunal.

Asif Hameed Qureshi
Advocate.

9

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No:- _____/2021

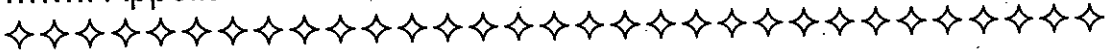
Gul Nawaz

Versus

Regional Police Officer
& others

..... Appellant

..... Respondents



AFFIDAVIT

I, Gul Nawaz S/o Malik Mir Askar R/o Borkhi Khall,
Collage Colony, District Kurram (The appellant) do hereby
solemnly affirm and declare on oath that the contents of this
accompanying Service Appeal are true and correct to the best of
my knowledge and belief and nothing has been concealed from
this Honourable Court.

11/3/21

ATTESTED
27/09/2021

DEPONENT
CNIC No:- 21303-2178950
Cell No:- 0302-9039432

(11)

4. That for issuing interim relief, the contents of main appeal may kindly be considered as integral part of this application.

It is, therefore, humbly prayed that on acceptance of this application, the impugned orders of respondent No 2 dated 28/04/2021 & order of respondent No 1 dated 30/08/2021 may kindly be suspended, till the final decision of the titled appeal.

Dated:- 27/09/2021

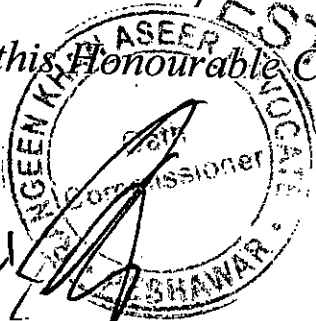
عل نواز
Petitioner

Through:-

Asif Hameed Qureshi
Advocate Supreme Court

AFFIDAVIT

I, Gul Nawaz S/o Malik Mir Askar R/o Borkhi Khall, Collage Colony, District Kurram, (The appellant) do hereby solemnly affirm and declare on oath that the contents of this accompanying application for suspension are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court:



عل نواز
DEPONENT
CNIC No:- 21303-2178950
Cell No:- 0302-9039432-
11/9/06

12

Annexure A

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

Peshawar dated the 14/5/2020

No.SO(Police)HD/SMY 2019 Merged Area 403-13 In pursuance of the provisions contained in section 9 of the Khyber Pakhtunkhwa Levies Force Act, 2019 (Khyber Pakhtunkhwa Act No.XXXV of 2019) read with rule 3 of the Levies Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Levies Force of Kurram Tribal District in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
1. ✓	Najaf Ali	Sarbat Ali	SUB BS-13	SI-BS 14
2.	Niaz Mohammad	Raham Din	SUB BS-13	SI-BS 14
3.	Ashiq Ali	Nihamad Hassan	SUB BS-13	SI-BS 14
4. ✓	Siraj Ud Din	Sarib Din	SUB BS-13	SI-BS 14
5. ✓	Nazir Hussain	Wazir Ali	SUB BS-13	SI-BS 14
6. ✓	Kasim Khan	Saam Khan	SUB BS-13	SI-BS 14
7. ✓	Naeem Hassan	Ali Faqir	N/SUB BS-11	ASI BS-11
8. ✓	Sahbat Khan	Gul Baz Khan	N/SUB BS-11	ASI BS-11
9. ✓	Rehmat Ali	Haider Ali	N/SUB BS-11	ASI BS-11
10. ✓	Hakim Hussain	Sarwar Khan	N/SUB BS-11	ASI BS-11
11. ✓	Muhammad Ullah Jan	Jadram	N/SUB BS-11	ASI BS-11
12. ✓	Sayed Jamal Hussain	S Hashim Hussain	N/SUB BS-11	ASI BS-11
13. ✓	Haider Ghulam	Saidar Ali	N/SUB BS-11	ASI BS-11
14. ✓	Ali Askar	Ghulam Akbar	N/SUB BS-11	ASI BS-11
15. ✓	Abdul Nabi	Ali Nabi	N/SUB BS-11	ASI BS-11
16. ✓	Mehboob Ali	Mardan Ali	N/SUB BS-11	ASI BS-11
17. ✓	Nusrat Hussain	Nawab Hussain	N/SUB BS-11	ASI BS-11
18. ✓	Imtiyar Hussain	Rajat Ali	N/SUB BS-11	ASI BS-11
19. ✓	Mansab Ali	Muhammad Hanif	N/SUB BS-11	ASI BS-11
20. ✓	Hidayat Hussain	Nijat Hussain	N/SUB BS-11	ASI BS-11
21. ✓	Jamil Hussain	Nabi Hussain	N/SUB BS-11	ASI BS-11
22. ✓	Shah Hussain	Muhammad Ali Khan	N/SUB BS-11	ASI BS-11
23. ✓	Shabir Hussain	Muhammad Hussain	N/SUB BS-11	ASI BS-11
24. ✓	Jamal Hussain	Lal Hussain	N/SUB BS-11	ASI BS-11

TESTED

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**GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT.**

NOTIFICATION

Peshawar dated the 14/02/2020

No. SO(Police)HD/SMY 2019 Merged Area/403-13 In pursuance of the provisions contained in section 9 of the Khyber Pakhtunkhwa Levies Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXV of 2019) read with rule 3 of the Levies Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Levies Force of Kurram Tribal District in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members.

S #	Name	Father's Name	Previous Rank	Rank in Which Absorbed
1.	Najaf Ali	Sharbat Ali	SUB BS-13	SI-BS 14
2.	Niaz Muhammad	Raham Din	SUB BS-13	SI-BS 14
3.	Ashiq Ali	Muhammad Hassan	SUB BS-13	SI-BS 14
4.	Siraj ud Din	Sahib din	SUB BS-13	SI-BS 14
5.	Nazir Hussain	Wazir Ali	SUB BS-13	SI-BS 14
6.	Kafoor Khan	Salim Khan	SUB BS-13	SI-BS 14
7.	Naeem Hassan	Ali Faqir	N/SUB BS- 11	ASI BS-11
8.	Sabbat Khan	Gul Baz Khan	N/SUB BS- 11	ASI BS-11
9.	Rehman Ali	Haider Ali	N/SUB BS-	ASI BS-11

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10.	Hakim Hussain	Sarwar Khan	N/SUB BS-11	ASI BS-11
11.	Muhammad Ullah Jan	Jadran	N/SUB BS-11	ASI BS-11
12.	Sayed Jamal Husain	S. Hashim Hussain	N/SUB BS-11	ASI BS-11
13.	Haider Ghulam	Safdar Ali	N/SUB BS-11	ASI BS-11
14.	Ali Askar	Ghulam Akbar	N/SUB BS-11	ASI BS-11
15.	Abdul Nabi	Ali Nabi	N/SUB BS-11	ASI BS-11
16.	Mehboob Ali	Mardan Ali	N/SUB BS-11	ASI BS-11
17.	Nusrat Hussain	Nawab Hussain	N/SUB BS-11	ASI BS-11
18.	Imtiaz Hussain	Rajab Ali	N/SUB BS-11	ASI BS-11
19.	Mansab Ali	Muhammad Hanif	N/SUB BS-11	ASI BS-11
20.	Hidayat Hussain	Nijat Hussain	N/SUB BS-11	ASI BS-11
21.	Jamil Hussain	Nabi Hussain	N/SUB BS-11	ASI BS-11
22.	Shabir Hussain	Muhammad Ali Khan	N/SUB BS-11	ASI BS-11
23.	Shabir Hussain	Muhammad Hussain	N/SUB BS-11	ASI BS-11
24.	Jamal Hussain	Lal Hussain	N/SUB BS-11	ASI BS-11

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No.	Name	Father's Name	Previous Rank	Rank in this
26	Wahid Ali	Ahmad Ali Khan	NSUB BS II	AS BS II
27	Syed Imran Hussain	Syed Zayn Hussain	NSUB BS II	AS BS II
28	Hussain Akbar	Ali Ghulam	NSUB BS II	AS BS II
29	Muhammad Hussain	Zawar Hussain	NSUB BS II	AS BS II
30	Hamid Hussain	Ibrahim Ali	NSUB BS II	AS BS II
31	Rahman Ali	Mir Ali	NSUB BS II	AS BS II
32	Mohammad Ahmad	Ghali Khan	NSUB BS II	AS BS II
33	Ibrahim Hussain	Shah Ali	NSUB BS II	AS BS II
34	Sahib Hussain	Imran Ali	NSUB BS II	AS BS II
35	Murwar Hussain	Qasim Ali	NSUB BS II	AS BS II
36	Muham Hussain	Muhammad Hussain	NSUB BS II	AS BS II
37	Badshah Hussain	Mir Akbar Khan	NSUB BS II	AS BS II
38	Mehboob Hussain	Muhammad Ghali Khan	NSUB BS II	AS BS II
39	Muhammad Saqib Faras	Badshah Khan	NAIK BS 7	Constable BS 7 A1
40	Khan Gul	Sardar Gul	NAIK BS 7	Constable BS 7 A1
41	Laif Khan	Shabbir Khan	NAIK BS 7	Constable BS 7 A1
42	Zahir Khan	Gul Shoh	NAIK BS 7	Constable BS 7 A1
43	Munir Hussain	Sadaf Ali	NAIK BS 7	Constable BS 7 A1
44	Khan Waris	Zar Ali Khan	NAIK BS 7	Constable BS 7 A1
45	Muhammad Shah	Muhammad Nazir	NAIK BS 7	Constable BS 7 A1
46	Sayed Javid Hussain	S. Muhammad Badshah	NAIK BS 7	Constable BS 7 A1
47	Ali Mahsin	Mir Hussain	NAIK BS 7	Constable BS 7 A1
48	Pir Khan	Nadir Khan	NAIK BS 7	Constable BS 7 A1
49	Ahmad Ali	Jan Ali	NAIK BS 7	Constable BS 7 A1
50	Jamil Hussain	Khusht Hussain	NAIK BS 7	Constable BS 7 A1
51	Sayed Jamil Hussain	Sayed Kamal Hussain	NAIK BS 7	Constable BS 7 A1
52	Sardar Hussain	Khalid Hussain	NAIK BS 7	Constable BS 7 A1
53	Hayat Ali	Wahid Ali	NAIK BS 7	Constable BS 7 A1
54	Noor Afzal	Khadim Mir	NAIK BS 7	Constable BS 7 A1
55	Hayat Ali	Sher Mehdi	NAIK BS 7	Constable BS 7 A1
56	Laif Hussain	Sayed Ghulam	NAIK BS 7	Constable BS 7 A1
57	Feroz Hussain	Shehzad	NAIK BS 7	Constable BS 7 A1
58	Imdad Ali	Sardar Ali	NAIK BS 7	Constable BS 7 A1
59	Basant Ali	Ali Noor	NAIK BS 7	Constable BS 7 A1
60	Daraz Ali	Haidar Ali	NAIK BS 7	Constable BS 7 A1
61	Khan Sher	Gul Sher	NAIK BS 7	Constable BS 7 A1
62	Hamid Hussain	Gul Jan	NAIK BS 7	Constable BS 7 A1
63	Ajeb Ali	Mehboob Ali	NAIK BS 7	Constable BS 7 A1
64	Imdad Hussain	Relmat Ali	NAIK BS 7	Constable BS 7 A1
65	Qari Muhammad Ismail	Shah Wali Khan	NAIK BS 7	Constable BS 7 A1
66	Ghaffar Hussain	Lal Hussain	NAIK BS 7	Constable BS 7 A1
67	Imdad Hussain	Muhammad Ali	NAIK BS 7	Constable BS 7 A1
68	Sajid Hussain	Nawab Hussain	NAIK BS 7	Constable BS 7 A1
69	Munir Ali	Muhammad Ali	NAIK BS 7	Constable BS 7 A1
70	Sher Afzal	Ghulam Ali	NAIK BS 7	Constable BS 7 A1
71	Sadiq Hussain	Hussain Ghulam	NAIK BS 7	Constable BS 7 A1
72	Syed Khan	Mir Bansi	NAIK BS 7	Constable BS 7 A1

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S #	Name	Father's Name	Previous Rank	Rank in Which Absorbed
25.	Wahab Ali	Abidullah Jan	N/SUB BS 11	ASI BS 11
26.	Syed Imran Hussain	Syed Zawar Hussain	N/SUB BS 11	ASI BS 11
27.	Hussam Akbar	Ali Chulam	N/SUB BS 11	ASI BS 11
28.	Mujahid Hussain	Zawar Hussain	N/SUB BS 11	ASI BS 11
29.	Hamid Hussain	Ibrahim Ali	N/SUB BS 11	ASI BS 11
30.	Rahman Ali	Mir Ali	N/SUB BS 11	ASI BS 11
31.	Mukhtar Ahmad	Ghalji Khan	N/SUB BS 11	ASI BS 11
32.	Ibrar Hussain	Shah Ali	N/SUB BS 11	ASI BS 11
33.	Sabit Hussain	Imran Ali	N/SUB BS 11	ASI BS 11
34.	Mumtaz Hussain	Qadam Ali	N/SUB BS 11	ASI BS 11
35.	Munir Hussain	Muhammad Hussain	N/SUB BS 11	ASI BS 11
36.	Badshah Hussain	Mir Akbar Jan	N/SUB BS 11	ASI BS 11
37.	Mehboob Hussain	Muhammad Ullah Jan	NAIK BS 7	Constable BS 7 A 1
38.	Muhammad Sange Faras	Badshah Khan	NAIK BS 7	Constable BS 7 A 1
39.	Khan Gul	Samar Gul	NAIK BS 7	Constable BS 7 A 1
40.	Latif Khan	Shahbaz Khan	NAIK BS 7	Constable BS 7 A 1
41.	Zabir Khan	Gul Shah	NAIK BS 7	Constable BS 7 A 1
42.	Manzoor Hussain	Sadaf Ali	NAIK BS 7	Constable BS 7 A 1
43.	Khan Wazir	Zar Bat Shah	NAIK BS 7	Constable BS 7 A 1
44.	Muhammad Shah	Muhammad Nazir	NAIK BS 7	Constable BS 7 A 1
45.	Sayed Javid Hussain	S. Muhammad Bacshah	NAIK BS 7	Constable BS 7 A 1
46.	Ali Mohsin	Mir Hussain	NAIK BS 7	Constable BS 7 A 1
47.	Pio Khan	Nadir Khan	NAIK BS 7	Constable BS 7 A 1
48.	Akhbar Ali	Jan Ali	NAIK BS 7	Constable BS 7 A 1
49.	Jamil Hussain	Khishal Hussain	NAIK BS 7	Constable BS 7 A 1
50.	Sayed Jamil Hussain	Sayed Kamal Hussain	NAIK BS 7	Constable BS 7 A 1
51.	Sardar Hussain	Kilayat Hussain	NAIK BS 7	Constable BS 7 A 1
52.	Hayat Ali	Wahab Ali	NAIK BS 7	Constable BS 7 A 1
53.	Noor Afzal	Khudai Nazar	NAIK BS 7	Constable BS 7 A 1

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54.	Hayat Ali	Sher Mehdi	NAIK BS 7	Constable BS 7 A 1
55.	Latif Hussain	Sayed Ghulam	NAIK BS 7	Constable BS 7 A 1
56.	Fida Husain	Shahzada	NAIK BS 7	Constable BS 7 A 1
57.	Liaqat Alil	Sardar Ali	NAIK BS 7	Constable BS 7 A 1
58.	Barkat Ali	Ali Noor	NAIK BS 7	Constable BS 7 A 1
59.	Daftar Ali	Haider Ali	NAIK BS 7	Constable BS 7 A 1
60.	Noor Sher	Gul Sher	NAIK BS 7	Constable BS 7 A 1
61.	Habib Hussain	Gul Jan	NAIK BS 7	Constable BS 7 A 1
62.	Ajeeb Ali	Meerboob Ali	NAIK BS 7	Constable BS 7 A 1
63.	Inayat Hussain	Rehmat Ali	NAIK BS 7	Constable BS 7 A 1
64.	Qari Muhamamd Ismail	Shah Wali Khan	NAIK BS 7	Constable BS 7 A 1
65.	Ghadir Hussain	Lat Hussain	NAIK BS 7	Constable BS 7 A 1
66.	Inayat Hussain	Muhammad jan	NAIK BS 7	Constable BS 7 A 1
67.	Sajjad Hussain	Nawab Hussain	NAIK BS 7	Constable BS 7 A 1
68.	Manzoor Ali	Muhammad Ali	NAIK BS 7	Constable BS 7 A 1
69.	Sher Afzal	Ghulam Akbar	NAIK BS 7	Constable BS 7 A 1
70.	Sadiq Hussain	Hussain Ghulam	NAIK BS 7	Constable BS 7 A 1
71.	Siyal Khan	Mir Bat Khan	NAIK BS 7	Constable BS 7 A 1

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S.No	Name	Father's Name	Previous Rank	Rank in which Absorbed
72.	Syed Jalal	Nasirullah Jan	NAIK BS-7	Constable- BS-7 A-I
73.	Gul Khan	Sulay	NAIK BS-7	Constable- BS-7 A-I
74.	Syed Iftikhar Hussain	S Nisar Hussain Shah	NAIK BS-7	Constable- BS-7 A-I
75.	Arij Rehman	Khyal Meen	NAIK BS-7	Constable- BS-7 A-I
76.	Masab Hussain	Zamir Ghulam	NAIK BS-7	Constable- BS-7 A-I
77.	Rasim Jan	Maharajmagan	NAIK BS-7	Constable- BS-7 A-I
78.	Dawlat Hussain	Hussain Asghar	NAIK BS-7	Constable- BS-7 A-I
79.	Sakhi Gul	Abdul Khan	NAIK BS-7	Constable- BS-7 A-I
80.	Muhammad Hussain	Qadiri	NAIK BS-7	Constable- BS-7 A-I
81.	Gul S	Pro Gul	NAIK BS-7	Constable- BS-7 A-I
82.	Jalal Hussain	Ghulam Qambar	NAIK BS-7	Constable- BS-7 A-I
83.	Khan Badshah	Faqir Shah	NAIK BS-7	Constable- BS-7 A-I
84.	Arif Hussain	Dost Ali	NAIK BS-7	Constable- BS-7 A-I
85.	Qadiri	Sharif Ali	NAIK BS-7	Constable- BS-7 A-I
86.	Awal Khan	Syed Rasool	NAIK BS-7	Constable- BS-7 A-I
87.	Nazir Hussain	Abul Muhsin	NAIK BS-7	Constable- BS-7 A-I
88.	Shoqat Ali	Hassan Ali	NAIK BS-7	Constable- BS-7 A-I
89.	Shawroz Khan	Muhammad Khan	NAIK BS-7	Constable- BS-7 A-I
90.	Kamal Hussain	Asif Ali	NAIK BS-7	Constable- BS-7 A-I
91.	Kawar Ali	Muhammad Khan	NAIK BS-7	Constable- BS-7 A-I
92.	Sah Ghulam	Noor Muhammad	NAIK BS-7	Constable- BS-7 A-I
93.	Jamal Hussain	Ali Nazar	NAIK BS-7	Constable- BS-7 A-I
94.	Jamal Hussain	Muhammad Jan	NAIK BS-7	Constable- BS-7 A-I
95.	Sayed Jawhar Hussain	Sayed Ali Akbar	NAIK BS-7	Constable- BS-7 A-I
96.	Jamal Hussain	Asif Hussain	NAIK BS-7	Constable- BS-7 A-I
97.	Muhammad Haruf	Nazir Khan	NAIK BS-7	Constable- BS-7 A-I
98.	Zulfar Ali	Zafar Ali	NAIK BS-7	Constable- BS-7 A-I
99.	Muhammad Ali	Amir Khan Ali	NAIK BS-7	Constable- BS-7 A-I
100.	Masab Ali	Nasir Ali	NAIK BS-7	Constable- BS-7 A-I
101.	Sina Hussain	Noor Nahr	NAIK BS-7	Constable- BS-7 A-I
102.	Hussain Khan	Mirza Khan	NAIK BS-7	Constable- BS-7 A-I
103.	Sayed Muhsin Ali	Sayed Ameer Mian	NAIK BS-7	Constable- BS-7 A-I
104.	Zakir Hussain	Gul Jin	NAIK BS-7	Constable- BS-7 A-I
105.	Nabi Hussain	Sultan Hussain	NAIK BS-7	Constable- BS-7 A-I
106.	Muhammad Nabi	Akbar Jan	NAIK BS-7	Constable- BS-7 A-I
107.	Sayed Askar	Ali Askar	NAIK BS-7	Constable- BS-7 A-I
108.	Muhammad Shabr	Masab Din	NAIK BS-7	Constable- BS-7 A-I
109.	Gul Bano	Sarfaraz	NAIK BS-7	Constable- BS-7 A-I
110.	Wahab Ali	Faqir Ali	NAIK BS-7	Constable- BS-7 A-I
111.	Rahmat Gul	Haji Said Badshah	NAIK BS-7	Constable- BS-7 A-I
112.	Khalid Noor	Abdu Qadir	NAIK BS-7	Constable- BS-7 A-I
113.	Gulfam Hussain	Abbas Ghulam	NAIK BS-7	Constable- BS-7 A-I
114.	Sina Gul	Nazir Gul	NAIK BS-7	Constable- BS-7 A-I
115.	Wahid Ali	Sher Mehdi	NAIK BS-7	Constable- BS-7 A-I
116.	Ali Khan	Badshah Khan	NAIK BS-7	Constable- BS-7 A-I
117.	Nasir Hussain	Weza Ali	NAIK BS-7	Constable- BS-7 A-I
118.	Muhammad Shafiq	Eino Jin	NAIK BS-7	Constable- BS-7 A-I

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S #	Name	Father's Name	Previous Rank	Rank in Which Absorbed
72.	Sayed Jalai	Nasrullah Jan	NAIK BS 7	Constable BS 7 A 1
73.	Gul Khan	Salak	NAIK BS 7	Constable BS 7 A 1
74.	Syed Iftikhar Hussain	S. Nisar Hussain Shah	NAIK BS 7	Constable BS 7 A 1
75.	Aziz Rehman	Khiyal Meer	NAIK BS 7	Constable BS 7 A 1
76.	Masaib Hussain	Zarrin ghulam	NAIK BS 7	Constable BS 7 A 1
77.	Rahim Jan	Muhammad Jan	NAIK BS 7	Constable BS 7 A 1
78.	Dawlat Hussain	Hussain Asghar	NAIK BS 7	Constable BS 7 A 1
79.	Sakhi Gul	Akhtar Khan	NAIK BS 7	Constable BS 7 A 1
80.	Mujahid Hussain	Gul Ali	NAIK BS 7	Constable BS 7 A 1
81.	Gul Shirin	Pio Gul	NAIK BS 7	Constable BS 7 A 1
82.	Jamil Hussain	Ghulam Qambar	NAIK BS 7	Constable BS 7 A 1
83.	Khan Badshah	Faqir Shah	NAIK BS 7	Constable BS 7 A 1
84.	Arif Hussain	Doat Ali	NAIK BS 7	Constable BS 7 A 1
85.	Qadar Ali	Sheraf Ali	NAIK BS 7	Constable BS 7 A 1
86.	Awal Khan	Syed Rasool	NAIK BS 7	Constable BS 7 A 1
87.	Nazir Hussain	Ali Muhsin	NAIK BS 7	Constable BS 7 A 1
88.	Shoqat Ali	Hasan Ali	NAIK BS 7	Constable BS 7 A 1
89.	Shawroz Khan	Muhammad Khan	NAIK BS 7	Constable BS 7 A 1
90.	Kamal Hussain	Ashrif Ali	NAIK BS 7	Constable BS 7 A 1
91.	Kawsar Ali	Muhammad Khan	NAIK BS 7	Constable BS 7 A 1
92.	Shah Ghulam	Noor Muhammad	NAIK BS 7	Constable BS 7 A 1
93.	Jamal Hussain	Ali nazar	NAIK BS 7	Constable BS 7 A 1
94.	Jamal Hussain	Muhammad Jan	NAIK BS 7	Constable BS 7 A 1
95.	Sayed Jawhar Hussain	Sayed Ali Akbar	NAIK BS 7	Constable BS 7 A 1

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96.	Zamin Hussain	Ashraf Hussain	NAIK BS 7	Constable BS 7 A 1
97.	Muhammad Hanif	Nazir Khan	NAIK BS 7	Constable BS 7 A 1
98.	Zulfiqar Ali	Zafar Ali	NAIK BS 7	Constable BS 7 A 1
99.	Mujahid ali	Aziz Khan Ali	NAIK BS 7	Constable BS 7 A 1
100.	Mujeb Ali	Nasib Alli	NAIK BS 7	Constable BS 7 A 1
101.	Nabi Hussain	Noor Nabi	NAIK BS 7	Constable BS 7 A 1
102.	Hussain Khan	Miwa Khan	NAIK BS 7	Constable BS 7 A 1
103.	Sayed Muhsin Ali	Sayed Ameero Mia	NAIK BS 7	Constable BS 7 A 1
104.	Zakir Hussain	Gul Jan	NAIK BS 7	Constable BS 7 A 1
105.	Nabi Hussain	Sultan Hussain	NAIK BS 7	Constable BS 7 A 1
106.	Muhammad Nabi	Akbar jan	NAIK BS 7	Constable BS 7 A 1
107.	Sayed Askar	Ali Maskat	NAIK BS 7	Constable BS 7 A 1
108.	Muhammad Shabir	Mutarak Din	NAIK BS 7	Constable BS 7 A 1
109.	Gul Bano	Sarbaraz	NAIK BS 7	Constable BS 7 A 1
110.	Wahab Ali	Faqir Ali	NAIK BS 7	Constable BS 7 A 1
111.	Rahmat Gul	Haji Saib Badshah	NAIK BS 7	Constable BS 7 A 1
112.	Khaliq Noor	Abdul Qadir	NAIK BS 7	Constable BS 7 A 1
113.	Gulfam Hussain	Abbas Ghulam	NAIK BS 7	Constable BS 7 A 1
114.	Sina gul	Nazir Gul	NAIK BS 7	Constable BS 7 A 1
115.	Wazir Ali	Sher Mehdi	NAIK BS 7	Constable BS 7 A 1
116.	Wali Khan	Badshah Khan	NAIK BS 7	Constable BS 7 A 1
117.	Nasir Hussain	Wazir Ali	NAIK BS 7	Constable BS 7 A 1
118.	Muhammad Shafiq	Eino Din	NAIK BS 7	Constable BS 7 A 1

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S.No.	Name	Father's Name	Previous Rank	Rank in which Absorbed
119	Ghous Ali	Sayed Ghulam	NAIK BS-7	Constable BS-7 A-1
120	Nams Khan	Mir Bah Khan	NAIK BS-7	Constable BS-7 A-1
121	Sadaf Hussain	Muhammad Shah	NAIK BS-7	Constable BS-7 A-1
122	Muzafar Khan	Husein Khan	NAIK BS-7	Constable BS-7 A-1
123	Qasim Khan	Koor Allah Khan	NAIK BS-7	Constable BS-7 A-1
124	Zulfikar Ali	Sadaf Ali	NAIK BS-7	Constable BS-7 A-1
125	Ali Rehman	Fazal Rehman	NAIK BS-7	Constable BS-7 A-1
126	Rezaul Khan	Behram Khan	NAIK BS-7	Constable BS-7 A-1
127	Rajid Hussain	Nad Ali	NAIK BS-7	Constable BS-7 A-1
128	Imam Hussain	Muhammad Ali	NAIK BS-7	Constable BS-7 A-1
129	Gul Bah Khan	Mada	NAIK BS-7	Constable BS-7 A-1
130	Shafiq Khan	Sher Bah Khan	NAIK BS-7	Constable BS-7 A-1
131	Gul Nawaz	Mir Bah Khan	NAIK BS-7	Constable BS-7 A-1
132	Tahir Khan	Mir Bah Khan	NAIK BS-7	Constable BS-7 A-1
133	Akmal Munt	Abul Kabir	LNAIK BS-6	Constable BS-7 B-1
134	Peer Muzafar Ali Shah	Peer Ali Asghar	LNAIK BS-6	Constable BS-7 B-1
135	Wase Khan	Peer Akbar	LNAIK BS-6	Constable BS-7 B-1
136	Abdur Rasheed	Peer Das Shah	LNAIK BS-6	Constable BS-7 B-1
137	Rahman Din	Qudus Khan	LNAIK BS-6	Constable BS-7 B-1
138	Shawqat Hussain	Mir Hussain	LNAIK BS-6	Constable BS-7 B-1
139	Sayed Mirza Hussain	Sayed Gul Hussain	LNAIK BS-6	Constable BS-7 B-1
140	Bilal Hussain	Gil Sher	LNAIK BS-6	Constable BS-7 B-1
141	Zaman Hussain	Muhammad Zaman	LNAIK BS-6	Constable BS-7 B-1
142	Wahab Ali	Zawar Ali	LNAIK BS-6	Constable BS-7 B-1
143	Arif Ali	Nad Ali	LNAIK BS-6	Constable BS-7 B-1
144	Muhammad Imil	Amin Khan	LNAIK BS-6	Constable BS-7 B-1
145	Yaqoob Hussain	Nabi Hussain	LNAIK BS-6	Constable BS-7 B-1
146	Muhammad Yaqoob	Muhammad Ayub	LNAIK BS-6	Constable BS-7 B-1
147	Gul Akbar	Lal Hussain	LNAIK BS-6	Constable BS-7 B-1
148	Amin Ali	Ali Jabir	LNAIK BS-6	Constable BS-7 B-1
149	Khayal Wazir	Siva Khan	LNAIK BS-6	Constable BS-7 B-1
150	Jabbar Khan	Mansur Khan	LNAIK BS-6	Constable BS-7 B-1
151	Asghar Hussain	Ali Askar	LNAIK BS-6	Constable BS-7 B-1
152	Haider Zaman	Ali Bah Khan	LNAIK BS-6	Constable BS-7 B-1
153	Jan Hussain	Mir Muhammad Khan	LNAIK BS-6	Constable BS-7 B-1
154	Kamal Hussain	Gul Bah Hussain	LNAIK BS-6	Constable BS-7 B-1
155	David Hussain	Dad Gul	LNAIK BS-6	Constable BS-7 B-1
156	Nabi Khan	Sayid Khan	LNAIK BS-6	Constable BS-7 B-1
157	Munir Hussain	Qasim Gul	LNAIK BS-6	Constable BS-7 B-1
158	Haider Ali	Qasim Bah Ali	LNAIK BS-6	Constable BS-7 B-1
159	Dildar Hussain	Ashraf Hussain	LNAIK BS-6	Constable BS-7 B-1
160	Nasir Hussain	Ghulam Nabi	LNAIK BS-6	Constable BS-7 B-1
161	Asad Ali	Mul Bah Ali	LNAIK BS-6	Constable BS-7 B-1
162	Issac Khan	Khan Bah Khan	LNAIK BS-6	Constable BS-7 B-1
163	Nasir Hussain	Sayid Hussain	LNAIK BS-6	Constable BS-7 B-1
164	Musal Hussain	Muhammad Yousof	LNAIK BS-6	Constable BS-7 B-1
165	Imam Din	Ali Bah	LNAIK BS-6	Constable BS-7 B-1

ATTESTED

S #	Name	Father's Name	Previous Rank	Rank in Which Absorbed
119.	Kawar Ali	Sayed Ghulam	NAIK BS 7	Constable BS 7 A 1
120.	Waris Khan	Mir Mat Khan	NAIK BS 7	Constable BS 7 A 1
121.	Sadiq Hussain	Muhammad Shah	NAIK BS 7	Constable BS 7 A 1
122.	Muzafar Khan	Hiwa Khan	NAIK BS 7	Constable BS 7 A 1
123.	Qayum Khan	Noor Ullah Khan	NAIK BS 7	Constable BS 7 A 1
124.	Zulfiqar Ali	Sardr Ali	NAIK BS 7	Constable BS 7 A 1
125.	Alif rehman	Fazal Rehman	NAIK BS 7	Constable BS 7 A 1
126.	Rasool Khan	Bekram Khan	NAIK BS 7	Constable BS 7 A 1
127.	Sajid Hussain	Nad Ali	NAIK BS 7	Constable BS 7 A 1
128.	Jamil Hussain	Muhammad Alil	NAIK BS 7	Constable BS 7 A 1
129.	Gul Bar Khan	Malak	NAIK BS 7	Constable BS 7 A 1
130.	Shafiq Khan	Sher Mat Khan	NAIK BS 7	Constable BS 7 A 1
131.	Gul Nawaz	Mir Askar	NAIK BS 7	Constable BS 7 A 1
132.	Tabir Khan	Mir Azam	NAIK BS 7	Constable BS 7 A 1
133.	Abdul Munir	Abdul Kabir	L/NAIK BS 6	Constable BS 7 A 1
134.	Peer Muzafar Ali Shah	Peer Ali Asghar	L/NAIK BS 6	Constable BS 7 B 1
135.	Noor Khan	Noor Akbar	L/NAIK BS 6	Constable BS 7 B 1
136.	Abdur Rasheed	Peer Ali Asghar	L/NAIK BS 6	Constable BS 7 B 1
137.	Raham Din	Noor Akbar	L/NAIK BS 6	Constable BS 7 B 1
138.	Shoiqat Hussain	Peer Bat Shah	L/NAIK BS 6	Constable BS 7 B 1
139.	Sayed Mirza Hussain	Sayed Gul Hussain	L/NAIK BS 6	Constable BS 7 B 1
140.	Bilal Hussain	Gul Sher	L/NAIK BS 6	Constable BS 7 B 1
141.	Zamin Hussain	Muhammad Zaman	L/NAIK BS 6	Constable BS 7 B 1
142.	Wahab Ali	Zawar Ali	L/NAIK BS 6	Constable BS 7 B 1

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143.	Amjad Ali	Nad Ali	L/NAIK BS 6	Constable BS 7 B 1
144.	Muhammad Jamil	Amir Khan	L/NAIK BS 6	Constable BS 7 B 1
145.	Yaqoob Hussain	Nabi Hussain	L/NAIK BS 6	Constable BS 7 B 1
146.	Muhammad yaqoob	Muhammad Ayub	L/NAIK BS 6	Constable BS 7 B 1
147.	Gul Akbar	Lal Hussain	L/NAIK BS 6	Constable BS 7 B 1
148.	Amjad Ali	Ali Nabi	L/NAIK BS 6	Constable BS 7 B 1
149.	Khyal Wazir	Siya Khan	L/NAIK BS 6	Constable BS 7 B 1
150.	Jabbar Khan	Mangal Khan	L/NAIK BS 6	Constable BS 7 B 1
151.	Asghar Hussain	Ali Askar	L/NAIK BS 6	Constable BS 7 B 1
152.	Haider Zaman	Ali Mat Khan	L/NAIK BS 6	Constable BS 7 B 1
153.	Jan Hussain	Mir Muhammad Khan	L/NAIK BS 6	Constable BS 7 B 1
154.	Kamal Hussain	Gulab Hussain	L/NAIK BS 6	Constable BS 7 B 1
155.	Javid Hussain	Dad Gul	L/NAIK BS 6	Constable BS 7 B 1
156.	Nabi Khan	Sarwar Khan	L/NAIK BS 6	Constable BS 7 B 1
157.	Mumtaz Hussain	Too Gul	L/NAIK BS 6	Constable BS 7 B 1
158.	Haide Ali	Qambar Ali	L/NAIK BS 6	Constable BS 7 B 1
159.	Dildar Husain	Ashraf Hussain	L/NAIK BS 6	Constable BS 7 B 1
160.	Nasir Hussain	Ghulam Nabi	L/NAIK BS 6	Constable BS 7 B 1
161.	Asad Ali	Mulub Ali	L/NAIK BS 6	Constable BS 7 B 1
162.	Israr Khan	Khanan Khan	L/NAIK BS 6	Constable BS 7 B 1
163.	Nasir Hussain	Sardar Hussain	L/NAIK BS 6	Constable BS 7 B 1
164.	Iqbal Hussain	Muhammad Yousaf	L/NAIK BS 6	Constable BS 7 B 1
165.	Juma Din	Alaf Din	L/NAIK BS 6	Constable BS 7 B 1

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No.	Name	Father's Name	Previous Rank	Rank in which Absorbed
1415	Lari Hussain	Alli Ghulam	SEPOY BS-5	Constable BS-7
1416	Mahid Gul	Mahid Ghulam	SEPOY BS-5	Constable BS-7
1417	Malik	Saif Ullah Khan	SEPOY BS-5	Constable BS-7
1418	Sayed Ali Abbas	Sayed Abbas Khan	SEPOY BS-5	Constable BS-7
1419	Shajrat Hussain	Sulhan Hussain	SEPOY BS-5	Constable BS-7

2. The above absorption shall be subject to the following (terms and conditions):

- (i) Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules made thereunder.
- (ii) A member shall not be entitled for absorption, if he has resigned from Levies Force Service or has been terminated from the Service (but on account of misconduct, inefficiency or any other grounds) or has been retired from Service under the Federal Levies Force (Amended) Service Rules 2013, before commencement of the Khyber Pakhtunkhwa Levies Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXV of 2019).
- (iii) Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident Fund amounts of the Khyber Pakhtunkhwa Civil Service Act, 1973 (Khyber Pakhtunkhwa Act No. XXVIII of 1973).
- (iv) Their seniority shall be determined in accordance with rule 6 of the Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.
- (v) They shall undergo training as provided in rule 7 of Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.

Secretary

to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department

No. & date even.

CC to:

- 1. Inspector General of Police, Khyber Pakhtunkhwa
- 2. Accountant General, Khyber Pakhtunkhwa
- 3. Regional Police Officer, Kohat
- 4. District Police Officer, Kurram Tribal District
- 5. Deputy Commissioner, Kurram Tribal District
- 6. PS to Chief Secretary, Government of Khyber Pakhtunkhwa
- 7. PS to Secretary, Home & Tribal Affairs Department, Khyber Pakhtunkhwa
- 8. PS to Special Secretary, Home & Tribal Affairs Department, Khyber Pakhtunkhwa
- 9. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa
- 10. Manager, Printing Press for notifying the same in the official gazette.
- 11. Office record file.

ATTESTED

(Signature)

Section Officer (Levies & Khaskardar)

(Signature)

S #	Name	Father's Name	Previous Rank	Rank in Which Absorbed
1435.	Laiq Hussain	Ali Ghulam	SEPOY BS 5	Constable BS 7
1436.	Bakht gul	Mah Mangol	SEPOY BS 5	Constable BS 7
1437.	Malik	Saif Ullah Khan	SEPOY BS 5	Constable BS 7
1438.	Sayed Ali Abbas	Sayed Abbas Kazmi	SEPOY BS 5	Constable BS 7
1439.	Shujat Hussain	Sultan Hussain	SEPOY BS 5	Constable BS 7

2. The above absorption shall be subject to the following terms and conditions.

- i. Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules made thereunder.
- ii. A member shall not be entitled for absorption, if he has resigned from Levies Force Service or has been terminated from the Service ibid on account of misconduct, inefficiency or any other grounds or has been retired from Service under the Federal Levy Force (Amended / Service Rules 2013, before commencement of the Khyber Pakhtunkhwa Levies Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXV of 2019).
- iii. Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).
- iv. Their seniority shall be determined in accordance with rule 6 of the Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.
- v. They shall undergo training as provided in rule 5 of Levies Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.

Secretary
to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department

No & date memo

CC to:

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. Accountant General Khyber Pakhtunkhwa.
3. Regional Police Officer, Kohat.
4. District Police Officer Kurram Tribal District.
5. Deputy Commissioner Kurram Tribal District.
6. PS to Chief Secretary Government of Khyber Pakhtunkhwa.
7. PS to Secretary Home & TAs Department Khyber Pakhtunkhwa.
8. PS to Special Secretary II Home & Tas Department Khyber Pakhtunkhwa.
9. PS to Secretary Establishment Department Khyber Pakhtunkhwa.
10. Manager Printing Press for notifying the same in the official gazette.
11. Office record file.

Sd/-
Section Officer (Levies & Khasadars)

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حکم

Annul dya (B)

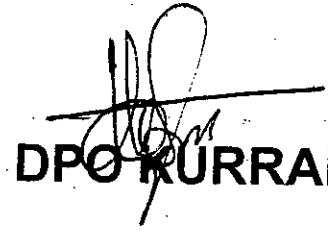
OB/OASI NO 167 Dated: 14/04/2021

ذیل تبادلہ جات فوری طور پر کئے جاتے ہیں۔

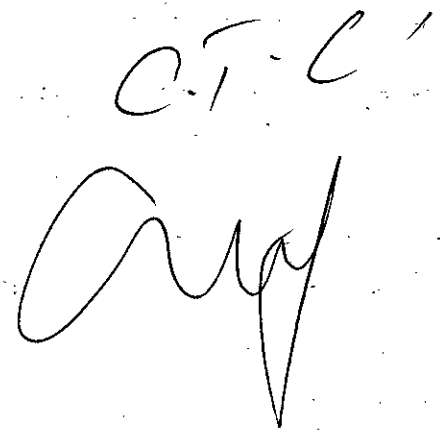
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شلوزان ڈاگوچیک پوسٹ کو	پولیس لائن پاراچنار سے	03049544563	671090	محمد حسن	شہیر حسین	SI. Cii	1
پاراچنار سستہ بازار گارڈ کو	شلوزان ڈاگوچیک پوسٹ سے	03049667303	671118	عمران علی	ثابت حسین	ASI	2
پاراچنار سستہ بازار گارڈ کو	پولیس لائن پاراچنار سے	03029039432	672112	میر عسکر	گل نواز	LHC	3
پاراچنار سستہ بازار گارڈ کو	پولیس لائن پاراچنار سے	03018870283	671051	نور علی	عمران علی	LHC	4
پاراچنار سستہ بازار گارڈ کو	پولیس لائن پاراچنار سے	03060952314	671937	عزیز علی خان	مجاہد حسین	LHC	5
پاراچنار سستہ بازار گارڈ کو	ڈاگوچیک پوسٹ سے	03045444525	672168	سید اکبر جان	سید میر انور	LHC	6
پاراچنار سستہ بازار گارڈ کو	پولیس لائن پاراچنار سے	03039199764	672177	حیدر غلام	بشارت حسین	Con	7

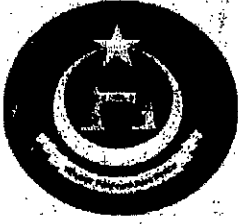


OASI KURRAM



DPO KURRAM





Amir
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CB

**OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA**

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No. 473/PA Dated Parachinar 04-02-20

DISCIPLINARY ACTION.

Mr. Tahir Iqbal District Police Officer as competent authority, am the opinion that you Constable Gul Nawaz salary No. 00672112 s/o Mir Askar rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (amended 2014) as you have committed the following act.

STATEMENT OF ALLEGATIONS

That you have partnership with drug peddlers and selling drugs to minors which is gross misconduct in official duty and criminal act.

For the purpose of conduct inquiry with reference to the above allegations DSP Investigation is appointed as Inquiry officer. The inquiry officer shall in accordance with the provision of the Police Rule 1975 (amended 2014) provide reasonable opportunity of hearing to the above official within (07) day of the receipt of this order, recommendations as to punishment or other appropriate action against the official.

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

**District Police Officer
Kurram**

Copy to the:

1. Inquiry Officer for initiating proceedings against the official under the provision of Police Rule 1975.
2. The official with the direction to appear before the Inquiry Officer on the date, time and place fixed by him for the purpose of inquiry proceedings.

**District Police Officer
Kurram**

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[Signature]



Announce
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**OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA**

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No.474...../PA Dated Parachinar: 04-02-20

CHARGE SHEET

Mr. Tahir Iqbal District Police Officer as competent authority under Khyber Pakhtunkhwa Police Rule 1975 (amended 2014), am the opinion that you Constable Gul Nawaz salary No. 00672112 s/o Mir Askar had rendered yourself liable to be proceeded against as you have committed the following act within the meaning of the Police Rules 1975 amended 2014.

That you have partnership with drug peddlers and selling drugs to minors which is gross misconduct in official duty and criminal act.

By reason of the above, you appear to be guilty of misconduct under the Police Rule 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the Police Rules.

You are, therefore, required to submit your written statement within (03) days of the receipt of this charge sheet to the inquiry officer.

Your written defense if any should reached the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you.

A statement of allegation is enclosed!

**District Police Officer
Kurram**

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بازار کاشی گل فوارہ و دیگر عمارت

11/02/00

کوارٹر جامع مسجد - 474 کار نمبر - DPA کا - الخ
صرف کار نمبروں کے قریب 20 سال سے جو صرف قریب عمارت
سراجام کے رہے ہوں - افسرین کا کہنا ہے کہ یہ عمارت کا قریب
عمریت ہے - جو یہ ہوا الزام دیا گیا ہے - یہ عمارت اور
صرف گھر ہے - یہ عمارت کے قریب قریب عمارت کے
تیار ہوں - قریب کوارٹر مسجد کے ہے - نیز جامع مسجد کا نمبر 474

گل فوارہ LTC
11/02/00

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[Signature]

Annexure
(F)

نائب ریورٹ
2

صوبائی ایف ڈی

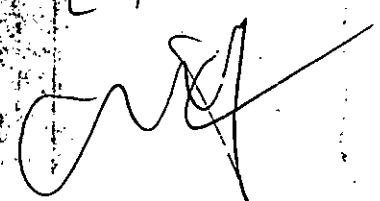
کوالم خارج شہر سیم 473 فورم 2 04 31 مہما

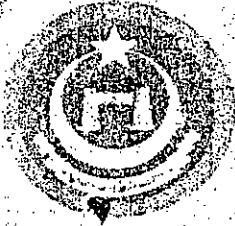
2021
تقریریں خدمت سے ہوں کہ LHC کی رپورٹ پالیسی

کے خلاف مہمان عالیہ سنان علی و صاحبین و غیرہ نے منشیات فروشی
 میں ملوث ہونے کی کڑی نوٹس جاری کیا ہے۔ DPO صاحب کو دی گئی ہے
 نے مذکورہ LHC کو خارج شہر جاری کیا ہے۔ مذکورہ LHC کا انوائسری
 نے اپنے خلاف لگانے کے الزامات کے جو بیان دیا ہے۔ اپنے انوائسری
 قرار دے دیا ہے۔ مگر اس کے برخلاف مہمان عالیہ سنان علی و صاحبین علی
 و غیرہ نے جو کڑی نوٹس دی ہے۔ جو مذکورہ LHC کے خلاف ہم مذکورہ LHC
 منشیات کا عادی ہے۔ اور علی باجوان پیروہ ڈپوٹی سپرنٹنڈنٹ ہوں کہ
 منشیات فراہم کرتا ہے۔ جس کا ثبوت ہم ہے۔ کہ اب بھی بیمار لے کے زائد ہیں
 بھرتی کرنا 16/17 سال جو مذکورہ رپورٹ منشیات کا عادی بنائے ہیں۔ جو
 کلیدار ہار ہار میں زیر عمل ہے۔ اسے علاوہ مذکورہ LHC کے ہر ادارے میں منشیات
 فروہ دھندے میں ملوث ہے۔ جسکی ارشاد علی جو مذکورہ LHC کا سہ ماہی ہے
 منشیات کی فروشی کا کھلم کھلا دھندہ کرتا ہے۔ جو مذکورہ LHC کا حکم پولیس کا
 گاہکوں کے پورے ہر ادارے کی لپٹ میں رکھا ہے۔ جو عوام کے لیے ناسور ہے
 جسکی ارشاد علی FIR کی منشیات فروشی میں (فار ہوا گیا ہے) انوائسری ہے
 لہذا LHC کی رپورٹ پالیسی جو سٹوڈنٹ ASI میں لگا ہے
 پولیس کے لیے مدد کی گامت ہے۔ انوائسری مقرر کی ہے۔ مذکورہ کلیدار LHC کو نالائقی
 دی جانے کی سفارش کی ہے

ریورٹ عرض ہے

K
 DSP (INV) K
 27/4/2021
 NO: 142 / DSP (INV)

C.T.C




Annexure
5

22

OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No. 1448-59/PA Dated Parachinar 28/4/2021

ORDER

This order is passed on the Charge Sheet against Constable Gul Nawaz s/o Mir Askar Salary No.00672112 under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014).

Brief facts are that while posted at Stadium Check Post Upper Kurram had involved as narcotics peddler and selling narcotics to minors reported by Locals of the area, in this regard, statements of the Hidayat Ali s/o Shaban Ali, Zamin Hussain s/o Shaban Ali, Mastan Ali s/o Shaban Ali resident of stadium colony and as per inquiry officer report proved criminal constable Gul Nawaz s/o Mir Askar as narcotics/drug seller, the same act is cause of bad name for police in public and gross misconduct under police rules 1975 (Amendment 2014).

In view of the above I, Tahir Iqbal District Police Officer Kurram in exercise of the powers conferred upon me, hereby award him a major punishment of "Dismissal from Service" with immediate effect and his absence period is treated as leave without pay.

OB No. OAS1. 178

Date 28 / 04 / 2021

District Police Officer
Kurram

No and Date is even:

Copy of the above is forwarded to the:-

1. Regional Police Officer, Kohat.
2. District Account Officer, Kurram.
3. Reader/R.I/SRS/OHC for necessary action.

Attested to be
true copy

District Police Officer
Kurram

District Police Officer
Kurram

(23)

BEFORE THE HONOURABLE REGIONAL POLICE OFFICER KOHAT DIVISION KOHAT

Annexure (H)

Constable Gul Nawaz S/o Mir Askar
Police Department District Kurram Appellant

VERSUS

District Police Officer Kurram Respondent

S.P.C
for report
DPO
07/08/2021

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER VIDE NO. 1448-52/PA DATED 28-04-2021, WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE WITH IMMEDIATE EFFECT.

5760
no 4/5/21
PRAYER:

Office of the District Police Officer
1130
Dt. 7.5.21
District Kurram

DPO Kurram

for comments
also provide his
service documents/
Enquiry file.

On acceptance of this appeal, the impugned order being illegal, unlawful, ex-parte against police rules 1975 (amendment 2014) and also against the facts and circumstances of the case, therefore, the appellant may graciously be re-instated in service with all back benefits. Any relief deems appropriate which has not been specifically asked for be extended in favour of appellant to secure ends of justice.

C.T.C
[Signature]

24/5/21
Regional Police Officer
Kohat Region Kohat

4/5/21
FACTS:

- 1. Facts forming back ground of the case are that the appellant joined service as Sepoy in District Levy Kurram and, after merger into KPK, the appellant converted in

4/11

police department as constable and rendered 20 years service with good zeal, efficiently and to the entire satisfaction of the superior which is evident from the record.

- 2. That, allegations against the appellant was that while posted at Stadium Check Post Upper Kurram had involved as Narcotics Peddler and selling narcotics to minors of the area. This complaint was made by 03 number persons who are brothers on account of malafide intention just to harass and humiliate the appellant. The enquiry conducted against the appellant and DSP Kurram Investigation was appointed as enquiry officer, who did not conduct enquiry under relevant provision of police rule and proceeded ex-parte. On receipt of the enquiry report, the respondent mentioned above did not concentrate upon the merit of the case and awarded major penalty by dismissal him from service. (copy enclosed)
- 3. That feeling aggrieved, the appellant submit the instant appeal on the following grounds.

GROUND:

- a) That the impugned order referred to above is patently wrong, illegal, ex-parte and against the police rules and also against the facts and circumstances of the case therefore, the impugned order is liable to be set aside.
- b) That the respondent mentioned above has issued statement of allegations, charge sheet etc. served

28

A/2

upon the appellant, who gave explanation and denied baseless allegations against him but the respondent appointed enquiry officer to probe into the matter. The enquiry officer did not provide opportunity to the appellant and also did not examine the complainants who complained against the appellant and also the appellant condemn unheard which is against the relevant provision of police rules and natural justice therefore the impugned order is not sustainable in the eyes of law which may be stuck down.

- c) That the complainants mentioned in the impugned order had complained against the appellant on personal grudges i.e. extension of water supply pipe leading to police chowki. The matter was also reported to the to the DSP Kurram, the present enquiry officer, who settled the matter. Therefore the enquiry officer did not take into consideration this important factor of the case and ex-parte proceeding conducted due to unknown reasons, hence calling interference of your esteemed authority.
- d) That the appellant has rendered satisfactory service and no complaint against him, but account of malafide intention the complainant mentioned above involved the appellant in baseless allegations and dragged just for humiliation on account of the stated reason. It was incumbent upon the enquiry officer to ascertain the actual position by summoning the complainants to record their statement and to provide opportunity to the appellant to cross examine them, but both the enquiry officer and

CSL
CSL

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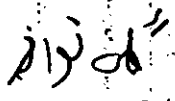
#13

competent authority (DPO Kurram) have flagrantly violated the relevant provision of police rules, therefore the impugned order is liable to be set aside.

- e) That the allegations are not proved against the appellant through reliable and cogent reasons, while the punishment dismissal from service is harsh, capricious, hence not tenable.
- f) That the appeal is within time.

Keeping in view of above, it is humbly prayed that the impugned order referred to above may please be set aside and the appellant may please be reinstated with all back benefits to secure ends of justice.

C.F.C.
Gul

Appellant 
Constable Gul Nawaz S/o Mir Askar
R/o Parachinar District Kurram
Cell: 0302-9039432

Dated 04-05-2021

POLICE DEPTT:

*Announce
(i)*

(27)

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal moved by Ex-Constable Gul Nawaz of district Kurram, against the punishment order, passed by DPO Kurram vide OB No. 178, dated 28.04.2021 whereby he was awarded major punishment of Dismissal from Service on the allegations of his involvement in narcotics peddlers and selling of narcotics.

Comments as well as relevant record were requisitioned from DPO Kohat and perused. The appellant was also heard in person in O.R held in this office on 30.08.2021. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.

Record gone through which indicates that the allegations leveled against the appellant are fully proved duly established by the E.O in his findings. Therefore, in exercise of the power conferred upon the undersigned under Rules 11-A, his appeal being devoid of merits is hereby dismissed. *to be rejected and dismissed*

Order Announced
30.08.2021

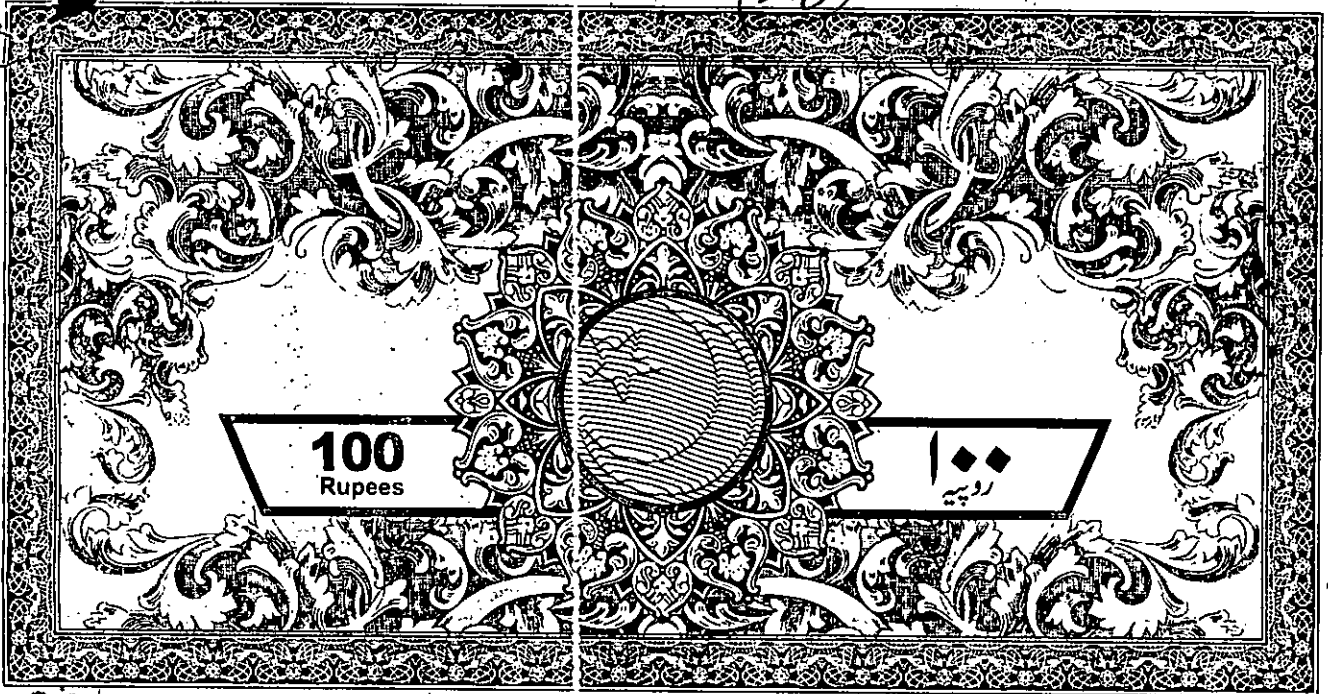
Mohammad Zafar Ali
(MOHAMMAD ZAFAR ALI) PSP
Region Police Officer,
Kohat Region.

No. 13773 /EC, dated Kohat the 1-09- 2021.

Copy to District Police Officer, Kurram for information and necessary action w/r to his office Memo: No. 396, dated 11.06.2021. His Service Book is returned herewith, please.

CT-C
[Signature]

Mohammad Zafar Ali
(MOHAMMAD ZAFAR ALI) PSP
Region Police Officer,
Kohat Region.



Amir
70



لاہی نامہ مابین ذیلین

فریق اول :- حاجی ستالی علی، ضامن مین، ہدایت علی پیراں، شعبان علی ساکنان سڈیم کالونی بارا چاچار
فریق دوم :- گل نواز (والدار گل نواز پورس فورس کم) ولد ملک سید عمر خان بارا چاچار
فریق اول نے لگانا ہی پیش و عقل سے اقرار کر کے فریق کو دیا ہے کہ مذکورہ فریق دوم نے ایک درخواست دیا تھا کہ فریق دوم کو سڈیم چیک پورٹ سے ٹرانسفر کر کے اور پولیس کی رولز اور گولڈ مین کے مطابق فریق دوم کو پولیس فورس سے برخاست کیا ہے۔ ہمارا یہ مقصد برکت اور قطعاً نہیں تھا۔ کہ فریق دوم کو ہماری وجہ سے اوصال ہو۔ اب مذکورہ کونسلان لقصان پنچا ہے۔ اوزیچوں کو سکول سے SLC ہو چکے ہیں۔ اور مزید اوصال ہو رہا ہے۔

لہذا ہم آپ لوگوں سے عی استدعا کرتے ہیں کہ مذکورہ والد کو حال کر لے لیں کہ ان کا تعلق نہایت غریب اور لے جانہ ظاندان ہے۔ مذکورہ کا بہت کم عرصہ پینشن کے لئے رہ گیا ہے۔ پتہ اس کے ساتھ کوئی دعویٰ، اعتراض نہیں ہے۔ دونوں فریقین کے مابین ایک دوسرے پر کوئی دعویٰ باقی نہ رہا۔

213037-856098-7

21303-7855936-3

21303-1467302-9

ایڈووکیٹ علی
پیراں چاچار

ضامن مین
چاچار

حاجی ستالی علی
ضامن مین

گل نواز

گل نواز
والدار گل نواز مذکور

21303-2243783-1

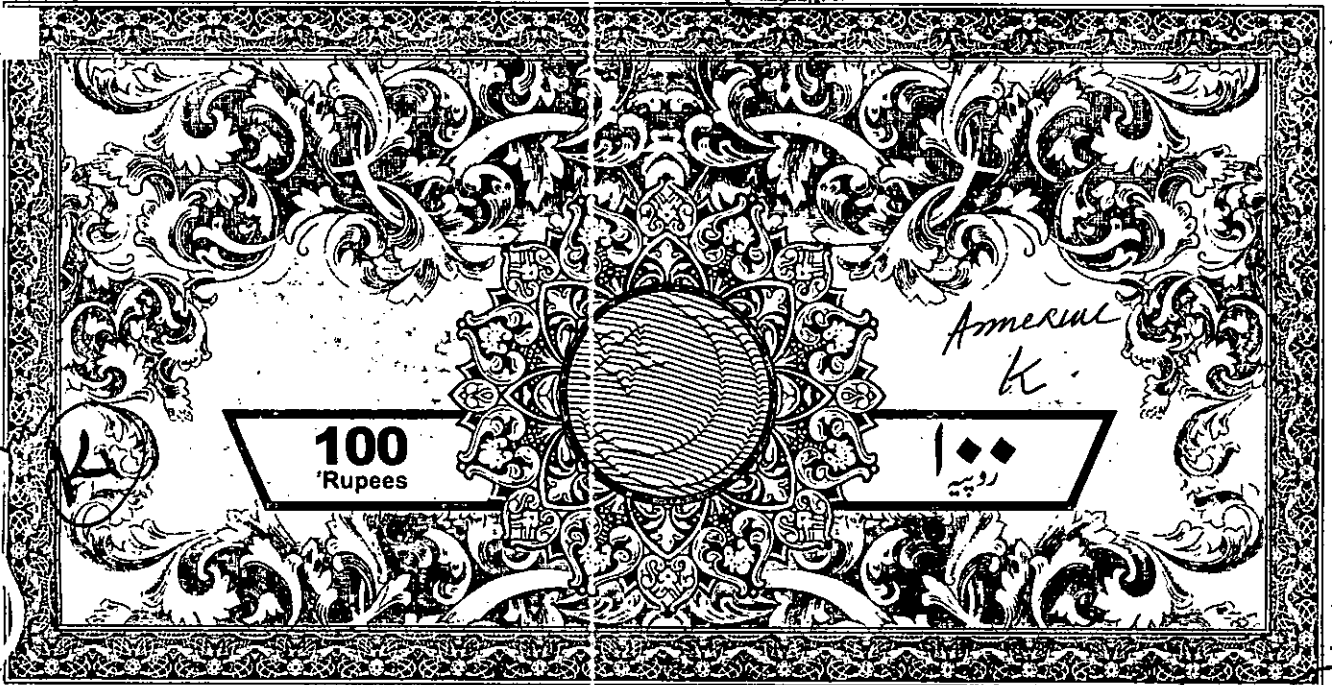
1. حاجی مقصود مین ولد ملک حاجی کورچن کورچی

21303-2178950-1

2. لائق مین ولد میرا مین بارا چاچار
لا لائق

21303 3352998-3

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Amer



رافضیہ بزمِ کائنات
 چاقی دست نامہ: فاضل حسین۔ پیرائیس۔ ان صاحبان عن بیان مسدود کارخانہ
 سائید حوالہ کارخانہ نو از ادسک صدر مسدود کارخانہ کئی پانہ صہارہ گاجی گاموں۔ فون دوع
 عنوان۔ بلکہ جواز اعترافی الزام نسبت فرسی ہر خلاف فون دوع
 مسدود عنوان ہا بلکہ فون از مسدود کارخانہ رہہ قسبی سے۔ ارد فون دوع سائید حوالہ کارخانہ
 قتل نو از جو مسدود صہارہ پوسٹ سے نسبت کئی ندر نسبت تھا۔ اردان کے خلاف
 چہ۔ P.O. کارخانہ کو درخواست درفی ہے ان کارخانہ مسدود صہارہ پوسٹ سے
 کئی اور کارخانہ اور درخواست ہے ان کو نیجا دہا ارد مسدود کارخانہ ہے ان پر بنیاد الزام
 نسبت فرسی کارخانہ لکار نامہ ان کو مذکورہ پوسٹ سے بنیاد صہارہ P.O.
 کارخانہ سے کارخانہ درخواست الزام کو بنیاد بنا کہ ملد زنت سے ہر طرف کارخانہ
 حال کارخانہ کارخانہ فون دوع مذکورہ حوالہ کارخانہ خلاف نسبت فرسی کارخانہ ہر طرف
 نہیں ہے۔ اور کارخانہ اعترافی ملد زنت سے ہر طرف سائید حوالہ کارخانہ اپنے کارخانہ کو
 سول سے کارخانہ اردان ہی کارخانہ کارخانہ کارخانہ ارد فون از اپنے کارخانہ
 الزامات ہر مسدود نہیں ہے۔ چہ کہ ان سے ان کے مابین گفت و شنید
 اور الزام فون اول کو خطا قرار دیا۔ اور فون اول سے فون دوعیہ کو صاف کیا۔
 کہنے سے کہ ان ہی سفارش رہے ہے کہ سائید حوالہ ارد فون دوع کو صاف

1/12

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Farid Hussain Bangash
Stamp Vendor Parachinar

فارس سے دایرہ راجستان رقبہ رقبہ رقبہ

سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

21303-14673029



1- سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

2- سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ



3- سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ



21303-14673029

سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

21303-33529983

سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

21303-14673029

21303-2243783

سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

سید احمد ایچ آر جمن ٹیپ سٹی ٹیپ

قیمت
50 روپے

86515



ایڈووکیٹ
بار کونسل / ایسوسی ایشن نمبر: 11 و 72 103
رابطہ نمبر: 9116224-0321

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: خیمہ بختون خواہ سروس ٹریبیونل کے لیے

مخاطب: <u>ایڈوانس</u>	دعویٰ: <u>Service Appeal</u>
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنگہ

مجلس نوابزادہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ درجہ زائرہ ایڈووکیٹس
آن مقام ایڈووکیٹ اعجاز حسین / محمد عظیم / محمد عظیم کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کھانے اور تقریر ثالث و فیصلہ بر حلف دینے جو اب دعویٰ اقبال دعویٰ اور درخواست از جرم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور پیروی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لے جاسکے اور اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ یا اختیار حاصل ہوں گے اور ان کا ساختہ پر داخلہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

25/9/2024
PESHAWAR BAR ASSOCIATION
KHAYBER PAKHTUNKHA

Accepted
[Signature]

العمر کل نورا / (ایڈوانس)
مقام

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔ CNIC No. 21303-2178950-1

[Signature] 3 ada

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

In S.A No.7502-P/2021

Mr. Gul Nawaz


Vs.

Regional Police Officer,
Kohat Region, District Kohat & others

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Reply		1-2
2.	Affidavit		3
3.	Authority Letter		4
4.	Application against Appellant	A	5
5.	Charge Sheet	B	6
6.	Inquiry Report	C	7
7.	Dismissal Order	D	8

Through Respondents


Muhammad Nasir Khan
(Focal Person)
Cell: 0300-5932556

①

BEFORE THE HONORABLE
KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR.

S.A.No.7502-P/2021.

Mr. Gul Nawaz s/o Mir Askar Caste Turi Duperzai resident of village Burki
Present address Collage Colony, Parachinar Upper Kurram District Kurram.

.....Petitioner.

VERSUS.

1. Regional Police Officer, Kohat Region, District Kohat.
2. District Police Officer, District Kurram.
3. Deputy Superintendent of Police (Inquiry Officer) District Kurram.

.....Respondents.

COMMENTS ON BEHALF OF RESPONDENTS 1, 2 & 3.

Respectfully Sheweth:-

The Parawise comments are submitted as under:-

PRELIMINARY OBJECTIONS:-

- i. That the appellant has got no cause of action
- ii. That the appellant has got no locus standi to file the Instant appeal.
- iii. That the appeal is bad for mis-joinder and nonjoinder of necessary parties.
- iv. That the appellant is stopped file the instant appeal from his own act/conduct.
- v. That the appeal is bad in eyes of law and not maintainable.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.

FACTS.

1. Pertains to record regarding appointment of appellant as "Levy Sepoy" in Kurram Levy Force in erstwhile FATA. After promulgation of 25th Constitutional Amendment, the services of erstwhile levies personnel have been absorbed in Khyber Pakhtunkhwa, Police in accordance with Khyber police force Act, 2019 and levy force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019. Hence, the appellant was absorbed in Khyber Pakhtunkhwa, police newly merged district Kurram.
2. Correct, the appellant absorbed in KP Police in BPS-7 and assigned duty at Stadium Check Post in Upper Kurram.
3. Incorrect, the appellant while posted at Stadium CP involved as narcotics peddler and selling narcotics to minors reported by locals of the area, statements of the Hidayat Ali, Zamin Ali and Mastan Ali etc resident of stadium colony and as per inquiry officer report proved criminal, drug seller, the same act is cause of misconduct under police rules. (Annex. A, B, C, D, E)


- 4. Correct, regarding issue of show cause notice and the appellant name mentioned in the notice. Therefore, there was no option except dismissal the appellant, who was burden on public exchequer.
- 5. The departmental appeal of the appellant and others was under process the office respondent No.1 and the appellant approached this Honoral Tribunal thus the departmental appeal has become functus officio.
- 6. Incorrect, the impugned order is passed by respondent No.2 according to fact and rules after proper inquiry initiated against him.
- 7. Incorrect, a legal and speaking order is passed by respondent No.2, accordance with relevant rules.

Grounds:-


- A. Incorrect, the impugned order is passed by respondent in according to fact and rules.
- B. Incorrect, reply is submitted in the above paras.
- C. The appellant was proceeded in accordance with law/rules by respondent. All the codal formalities are observed, but the appellant did not refrain.
- D. Incorrect, a legal and speaking order is passed by respondent No.3, accordance with relevant rules.
- E. Incorrect, reply is submitted in the above para "A".
- F. Incorrect, detail reply is submitted in above para "3".
- G. Incorrect, a legal and speaking order was passed by the respondent No.2.
- H. Incorrect, reply is submitted in the above paras.
- I. Respondents department may be allowed to raise other grounds at the time hearing of a petition.

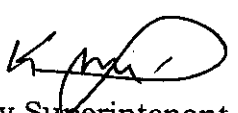
Prayers:-

In view of the above, it is prayed that the appeal being not maintainable it graciously be dismissed with costs, please.


 Deputy Inspector General of
 Police Kohat Region Kohat
 Respondent No.1

**DIG POLICE
KOHAT**


 District Police Officer Kurra
 Respondent No.2


 Deputy Superintendent Police (Enquiry Officer)

Respondent No.3

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

In S.A No 7502-P/2021.

Mr. Gul Nawaz S/o Mir Askar Caste Turi Duperzai resident of village Burki Presently address College Colony, Parachinar Upper Kurram District Kurram.

..... Petitioner

VERSUS.

- 1. Regional Police Officer, Kohat Region, District Kohat.
- 2. District Public Officer, District Kurram.
- 3. Deputy Superintendent of Police (Inquiry Officer) District Kurram.

..... Respondents

AFFIDAVIT.

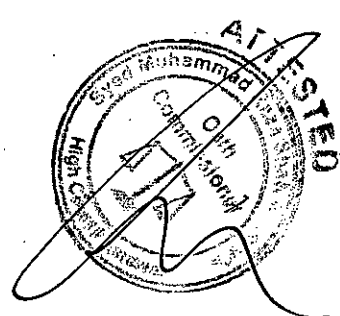
I, MUhammad Nasir Khan Senior Clerk Kurram, Police Force Focal Person (The authorized representative of respondent No.2), do hereby solemnly affirm & declare on oath that the contents of the this accompanying Para Wise Comments on behalf of respondent No.2 are true & correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.

Identified by

DEPONENT



Muhammad Nasir Khan
CNIC. No. 61101-2008170-1
Cell No. 0300-5932556



11 APR 2022

(4)

**IN THE HONORABLE KYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

S.A. No. 7502-P/2021

1. Mr. Gul Nawaz s/o Mir Askar Caste Tur Dupertai resident of village Burki
Present Address Village Chany, Puchinar Upper Kurram District Kurram.

Petitioner

VERSUS.

1. Regional Police Officer, Kohat Region, District Kohat.
2. District Police Officer, District Kurram
3. Deputy Superintendent of Police (Inquiry Officer) District Kurram

.....**Respondents**

AUTHORITY LETTER.

Mr. Nasir Khan s/o Shundi Gul Caste, Alisherzai resident of village Satec
Post Office & Tehsil Sadda District Lower Kurram (Focal Person) to District Police
Officer Kurram bearing CNIC No 61101-2008-170-1 is hereby authorized to
institute para-wise statements duly signed by respondents in the Honorable Court of
behalf of the respondents.


District Police Officer, Kurram
Respondent

(5)

Urgent.

27

Amex (A)

حضرت صاحب ڈی بی او صاحب ڈاکٹر لوہی انیس

درخواست ملو و تبادلہ حوالہ دہل نواز مسدوم جس کو

خباہتالی: گزارش قابل غور ہے کہ ہم باج اعلیٰ چاہتے ہیں

کہ حوالہ دہل نواز کو مسدوم چیک ڈسک سے تبدیل لاجائے

نوٹ: منوہم یہ لوگوں مختلف قسم کے لٹریچر ہے جس میں

جو بچوں کو دیکھتے ہیں اس کے وجہ سے دو بچے ان بچوں اور

نیم صحت کے خطر تڑپا 16، 17 سال کی ہے۔

بیتال - تنفا خانہ علماء شکیہ روڈ میں زیر علاج ہے۔ اور ہمارے دوست

میر علی گار جادو اور ہمارے گروہ میں ہے۔

سائڈز، حاجی ستان علی در حاجی ستان علی مسدوم کالونی

2 - ضامنین علی در حاجی ستان علی

3 - پائین علی در ستان علی

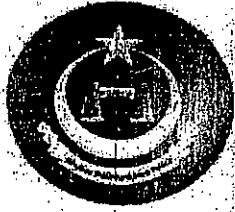
Change-sheep
Karimam Khan

Also selling cheap
from home
Drug peddler

0302-5765444

0306-0983463

0302-9429292



6
Annexure
131

OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com
No. 474...../PA Dated Parachinar 04-02-20

CHARGE SHEET

Mr. Tahir Iqbal District Police Officer as competent authority under Khyber Pakhtunkhwa Police Rule 1975 (amended 2014), am the opinion that you Constable Gul Nawaz salary No. 00672112 s/o Mir Askar had rendered yourself liable to be proceeded against as you have committed the following act within the meaning of the Police Rules 1975 amended 2014.

That you have partnership with drug peddlers and selling drugs to minors which is gross misconduct in official duty and criminal act.

By reason of the above, you appear to be guilty of misconduct under the Police Rule 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the Police Rules.

You are, therefore, required to submit your written statement within (03) days of the receipt of this charge sheet to the inquiry officer.

Your written defense if any should reached the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you.

A statement of allegation is enclosed.


District Police Officer
Kurram

7

Annex 1, C

ناظم رپورٹ

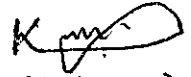
صوبائی ایف آئی

کوالم خارج سٹیٹم 473 حورہ 2 04 2021

معروضی خدشات ہوں کہ LHC کی نواز عرفان پابندی نہ ہو سکے

کے خلاف مہمان صبحی سٹان علی وضامین و غیرہ نے منشیات فروشی کے دھندے میں ملوث ہونے کی کئی کئی دفعہ رپورٹیں دی ہیں۔ جبکہ DPO صاحب کو دی گئی تھی۔ جبکہ DPO صاحب نے مذکورہ LHC کو خارج سٹیٹ جاری کیا ہے۔ مذکورہ LHC کا انوائسری شروع کر کے مذکورہ نے اپنے خلاف کیے گئے الزامات کے جواب دیئے ہیں۔ اپنے آپ کو بے گناہ اور بری الذمہ قرار دے رہا ہے۔ مگر اس کے باوجود مہمان صبحی سٹان علی وضامین علی و پیدائش صید و غیرہ نے جو کئی کئی دفعہ دیئے ہیں۔ جو مذکورہ LHC کے خلاف مذکورہ LHC پر سٹیٹ منشیات کا عادی ہے۔ اور جیل یا جہاں پر وہ ڈیوٹی پر تھیں ہوں۔ کم عمر بچوں کو منشیات فراہم کرتا ہے۔ جس کا ثبوت یہ ہے کہ اب بھی پتارے کے زائد صید و نعیم صید بچہ گرفتار کیا گیا 16/17 سال جو مذکورہ کی نواز نے منشیات کا عادی بنائے ہیں۔ جو شہنائی کا ملکہ دار پتارے میں زیر علاج ہے۔ اسے ملکہ دار مذکورہ LHC کے برادران بھی منشیات کے فروغ دھندے میں ملوث ہے۔ جسکی ارشاد علی جو مذکورہ LHC کا سہ ماہی ہے۔ منشیات کی فروشی کا کھلم کھلا دھندہ کرتا ہے۔ جو مذکورہ LHC کا قلم پولیس کا بااثر گاہکوں کے ہونے برادران کے پشت بنا ہی رہا ہے۔ جو عوام کے لیے ناسور بن گئے ہیں۔ جسکی ارشاد علی FIR جو منشیات فروشی میں (پتارے پتارے) مل گیا ہے۔ انوائسری ہے۔ لہذا LHC کی نواز عرفان پابندی جو سٹوڈنٹ آسی ایسٹ لگا ہے۔ قلم پولیس کے لیے بدنامی کا باعث ہے۔ انوائسری قلم کے لیے۔ مذکورہ لکھنؤ LHC کو منشیات فراہم کرنے کی سزا سنائی گئی ہے۔

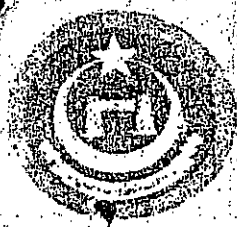
رپورٹ معروض ہے


 DSP (100V) K
 27/4/2021
 NO: 142 / DSP (100V)

8

Annex 'D'

#9



OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No. 1448-9/PA Dated Parachinar. 28/4/2021

ORDER

This order is passed on the Charge Sheet against Constable Gul Nawaz s/o Mir Askar Salary No.00672112 under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014).

Brief facts are that while posted at Stadium Check Post Upper Kurram had involved as narcotics peddler and selling narcotics to minors reported by Locals of the area, in this regard, statements of the Hidayat Ali s/o Shaban Ali, Zamin Hussain s/o Shaban Ali, Mastan Ali s/o Shaban Ali resident of stadium colony and as per inquiry officer report proved criminal constable Gul Nawaz s/o Mir Askar as narcotics/drug seller, the same act is cause of bad name for police in public and gross misconduct under police rules 1975 (Amendment 2014).

In view of the above I, Tahir Iqbal District Police Officer Kurram in exercise of the powers conferred upon me, hereby award him a major punishment of "Dismissal from Service" with immediate effect and his absence period is treated as leave without pay.

OB No. OAS1. 178

Date 28 / 04 / 2021

District Police Officer
Kurram

No and Date is even:

Copy of the above is forwarded to the:-

1. Regional Police Officer; Kchat.
2. District Account Officer, Kurram.
3. Reader/RJ/SRS/OHC for necessary action.

Attested to be
true copy

District Police Officer
Kurram

[Signature]
District Police Officer
Kurram



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

No. 1596 /ST Dated 07/06 /2023

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

To:

The District Police Officer, Kurram.

SUBJECT JUDGMENT IN SERVICE APPEAL NO. 7502/2021 TITLED GUL NAWAZ VERSUS REGIONAL POLICE OFFICER AND OTHERS.

I am directed to forward herewith a certified copy of judgment dated 23.05.2023, passed by this Tribunal in the above mentioned appeals for compliance.

Encl. As above.

(AAMIR FAROOQ)
ASSISTANT REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL,
PESHAWAR.