

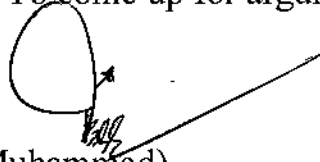
03.01.2023

Appellant alongwith his counsel present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Due to paucity of time arguments could not be heard.

Adjourned. To come up for arguments on 15.02.2023 before the D.B.

SCANNED
KF ST
PESHAWAR



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

15.02.2023

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment for preparation of arguments. Adjourned. To come up for arguments on 06.03.2023 before the D.B.

SCANNED
KF ST
PESHAWAR



(Fareeha Parul)
Member (E)



(Salah-ud-Din)
Member (J)


14.11.2022

Counsel for the appellant present.

Muhammad Jan, learned District Attorney for respondents present.

Learned Member (Judicial) is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 03.01.2023 before D.B

SCANNED
KPSI
Peshawar


(Fareeha Paul)
Member (E)

03.01.2023

~~Announcement of the court is hereby made that the court has adjourned the hearing of the case for the date 03.01.2023. The court has not made preparation for arguments.~~


~~(Muhammad Jan)~~
Member (E)

(Sajid-Ud-Din)
Member (J)

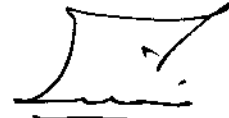
10.10.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, 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 21.10.2022.



(Mian Muhammad)
Member (E)

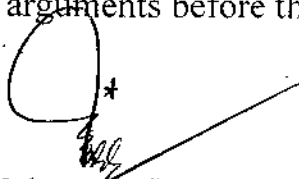


(Salah-Ud-Din)
Member (J)

21.10.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 14.11.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

27th July 2022 Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 23.09.2022 before the D.B.



(Salah-Ud-Din)
Member (J)



(Kalim Arshad Khan)
Chairman

23.09.2022 Appellant alongwith his counsel present. Syed Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

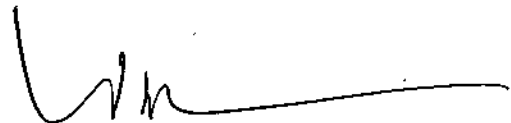
Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 10.10.2022 before the D.B.

(Mian Muhammad)
Member (Executive)

(Salah-Ud-Din)
Member (Judicial)

10.01.2022

Appellant in person present. Mr. Kabirullah Khattak, Addl. AG alongwith Younas SI (Legal) for respondents present and submitted reply/comments which are placed on file and copy of the same is handed over to the appellant. To come up for rejoinder if any, and arguments before the D.B on 15.03.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

15.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 12.5.2022 for the same as before.



Reader.

12-5-22

Proper DB not available the case is adjourned on 27-7-22



Reader

01.12.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on ~~07.12~~ 07.12.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

07.12.2021

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Tariq Umer, Inspector for respondents present.

Written reply/comments not submitted. Representative of the respondents seeks time to submit written reply/comments on the next date. Adjourned. To come up for written reply/comments on 10.01.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

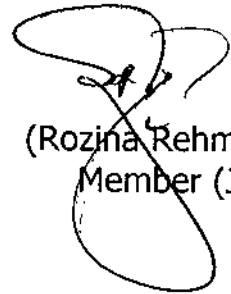
01.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to the respondents. To come up for written reply/comments on 08/07/2021 before S.B.

Appellant Deposited
Security & Process Fee

SCANNED
KPST
Peshawar


(Rozina Rehman)
Member (J)

08.07.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Muzafar S.I for the respondents present.

Representative of the respondents seeks further time to submit reply/comments. Respondents are directed to submit reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, office shall put up the file with a report of non-compliance. To come up for arguments on 01.12.2021 before the D.B.

Stipulated period has passed and reply has not been submitted.


Chairman

P.S

28.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.




Chairman



FORM OF ORDER SHEET

Court of _____

Case No.- 1622 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/01/2021 SCANNED KF ST PESHAWAR	<p>The appeal of Mr. Shafiq-ur-Rehman resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>01/04/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-	01/04/2021	<p>Appellant present through counsel. Preliminary arguments heard. (Recd. in person)</p> <p>Point raised need consideration. Appeal is admitted to regular hearing subject to all legal objections and appellant directed to deposit security and process fee within 10 days where after notice be issued to the respondents to come up with a reply/comments on <u>01/04/2021</u> before 5. In the interim file respondents would refrain to take any adversarial action against the appellant.</p> <p style="text-align: right;">A. BAZI, PESHAWAR Member</p>

The appeal of Mr. Shafiq-ur-Rehman DSP Counter Terrorism Department Hangu received today i.e. on 20/01/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures-C & F of the appeal are illegible which may be replaced by legible/better one.

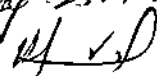
No. 144 /S.T,

Dt. 21/01/2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

NOTE L.

Obj. No 2, 2 has been removed - Hence re-submitted today 25-1-2021


**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. **1622** / 2021

SHAFIQ UR REHMAN

VS

POLICE DEPARTMENT

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1- 3.
2.	Record and Commendation certificates	A & B	4- 14.
3.	Explanation	C	15.
4.	Reply	D	16
5.	ACR & letters	E & F	17- 19.
6.	Departmental appeal	G	20- 22
7.	Rejection	H	23- 24
8.	Vakalat nama	25

APPELLANT

THROUGH:

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____ / 2021

Mr. Shafiq Ur Rehman, DSP/DFU,
Counter Terrorism Department at Hangu.

..... APPELLANT

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Regional Police Officer, Bannu Region, District Bannu.
- 3- The District Police Officer, District Lakki Marwat.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED LETTER DATED 17.9.2020 COMMUNICATED TO THE APPELLANT ON 1.10.2020 WHEREBY THE ADVERSE REMARKS IN THE ANNUAL CONFIDENTIAL REPORT FOR THE PERIOD W.E.F. 4.4.2019 TO 25.7.2019 HAS BEEN COMMUNICATED TO THE APPELLANT AND AGAINST THE APPELLATE ORDER DATED 17-12-2020 COMMUNICATED TO THE APPELLANT ON 22.12.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 17-12-2020 may very kindly be set aside and the adverse remarks recorded in the Annual Confidential Report of the appellant for the period w.e.f. 04-04-2019 to 25-07-2019 issued to the appellant on 17.9.2020 and communicated to the appellant on 1.10.2020 may kindly be expunged from the ACR for the period 4.4.2019 to 25.7.2019. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

1. That appellant is the employee of respondent Department and is performing his duties as Deputy Superintendent of Police CTD, Hangu quite efficiently and up to the entire satisfaction of high ups.

2. That the appellant was posted as SDPO Nourang Circle District Lakki Marwat w.e.f 09.11.2018 to 19.08.2019 and during the said as SDPO Nourang the appellant has recovered Arms, Ammunitions and Narcotics from the criminals. That on the basis of above performance the appellant received commendation certificates from his high ups. Copies of the record and commendation certificates are attached as annexure **A & B.**
3. That on 28.05.2019 the respondent No.3 had called explanation from the appellant about his overall progress and as such the appellant replied the same and thoroughly explained the position along with documentary proofs on 29.05.2019. Copies of the explanation and reply are attached as **Annexure** **C & D.**
4. That inspite of the clear position and an efficient Police Officer the respondent No.3 recorded adverse remarks in the ACR for the period w.e.f. 4.4.2019 to 25.7.2019 vide letter dated 17.09.2020 communicated to the appellant 1.10.2020 on the basis of personal annoyance. Copies of the ACR and letter are attached as annexure **E & F.**
5. That appellant feeling aggrieved from the impugned ACR for the period w.e.f. 4.4.2019 to 25.7.2019 issued on 17-09-2020 communicated to the appellant on 1.10.2020 preferred Departmental Appeal but the same has been rejected on no good grounds vide appellate order dated 17-12-2020 communicated to the appellant on 22.12.2020 through letter dated 18.12.2020. Copies of the Departmental appeal and rejection order are attached as annexure **G & H.**
6. That appellant feeling aggrieved and having no other remedy filed the instant appeal on the following grounds amongst the others.

GROUND:

- A- That impugned appellate order dated 17-12-2020 communicated to the appellant on 22.12.2020 is against the law, facts, norms of natural justice and material on record, hence not tenable in the eye of law and liable to be set aside.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules 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 no show cause notice has been served on the appellant by the respondents before recording adverse remarks in the ACR of the appellant for the period w.e.f. 4.4.2019 to 25.7.2019.
- D- That no chance of personal hearing/defense has been provided to the appellant before recording adverse remarks in the ACR of the appellant for period w.e.f. 4.4.2019 to 25.7.2019.
- E- That the respondents acted in arbitrary and malafide manner while recording adverse Remarks in the ACR of the appellant for period w.e.f. 4.4.2019 to 25.7.2019.
- F- That no inquiry has been conducted prior to issuance of the adverse remarks in the ACR for the period w.e.f. 4.4.2019 to 25.7.2019.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 19.01.2021

APPELLANT

SHAFIQ UR REHMAN

THROUGH:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&

**AFRASIAB KHAN WAZIR
ADVOCATES**

Weapons	2018	2019	Diff:
Kalashnikov	9	15	+6
Kala Kov	2	2	--
Rifle	1	3	+2
Shot Gun	18	48	+30
Pistol	32	39	+7
Rounds	833	1861	+1028
LMG / Stan Gun/Papasha	--	--	--
Hand Grenade	4	1	-3
Dagger / Knives	--	1	+1
Detonator	--	--	--
Prima Card	--	--	--
Safety Fuse	--	--	--
Bombs	--	--	--
RPG-7 Gola	--	--	--
Explosive Material	1 050	--	-1,050
Proclaim Offenders	30	50	+14
Military Deserters	--	--	--
Total	981	2020	+1039

NARCOTICS

Narcotics	2018	2019	Diff:
Chars	3 215	3 420	+0.205
Heroin	0.300	0.255	-0.045
Opium	--	--	--
Liquor	--	--	--
ICE	--	--	--
Total	3.515	3.675	+160

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
106 Cr.P.C	--	--	--
107 Cr.P.C	160	237	+77
109 Cr.P.C	51	74	+23
110 Cr.P.C	--	--	--
Total	211	311	+100

CIRCLE NAURANG (UPTO DATE)
COMPARATIVE RECOVERY OF ARMS & AMMUNITION.

(5)

01.01.2018-19 to 30.04.2018-19

Weapons	2018	2019	Diff:
Kalashnikov	54	54	--
Kala Kov	6	8	+2
Rifle	14	8	-6
Shot Gun	71	132	+39
Pistol	149	167	+18
Rounds	5263	7994	+2731
LMG / Stan Gun/Papasha	--	--	--
Hand Grenade	4	4	--
Dagger / Knives	--	1	+1
Detonator	--	--	--
Prima Card	--	--	--
Safety Fuse	--	--	--
Bombs	--	--	--
RPG-7 Gola	1	2	+1
Explosive Material	1,050	--	-1,050
Proclaim Offenders	217	227	+10
Military Deserters	--	--	--
Total	5775	8597	+2822

NARCOTICS

Narcotice	2018	2019	Diff:
Chars	15,530	150,405	+135,175
Heroin	4,515	2,895	-1,620
Opium	--	0,120	+0,120
Liquor	--	5 BTL	+5 BTL
Ice	--	0,010	+0,010
Total	20,045	153,435	+133,490

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
106 Cr.P.C	--	7	+7
107 Cr.P.C	855	1037	+182
109 Cr.P.C	204	180	-24
110 Cr.P.C	6	3	-3
Total	1065	1227	+162

CIRCLE NAURANG (MONTHLY))
COMPARATIVE RECOVERY OF ARMS & AMMUNITION.

01.05.2018-19 to 31.05.2018-19

Weapons	2018	2019	Diff:
Kalashnikov	11	13	+2
Kala Kov	1	3	+2
Rifle	3	11	+8
Shot Gun	23	29	+6
Rifle	46	65	+17
Rounds	1181	2080	+899
Shot / Stan Gun/Papast a
Hand Grenade
Explosive / Krizes	..	1	+1
Detonator
Plama Card
Safety Fuse
Bombs
RCS / Gola
Explosive Material
Reclaim Offenders	40	37	-3
Military Deserters
Total	1107	2210	+932
NARCOTICS			
Narcotics	2018	2019	Diff:
Opium	2310	3170	+0.860
Heroin	0.875	..	-0.875
Cocaine	1.110	..	-1.310
Liquid/Blood	..	0.820	+0.820
KC
Total	4.495	3.195	-1.300
PREVENTIVE ACTION			
PREVENTIVE:	2018	2019	Diff:
100 Cr.P.C	5	..	-5
137 Cr.P.C	138	208	+160
135 Cr.P.C	13	12	-1
132 Cr.P.C
Total	156	310	+154

CIRCLE NAURANG (UPTO DATE)
COMPARATIVE RECOVERY OF ARMS & AMMUNITION.

01.01.2018-19 to 31.05.2018-19

Weapons	2018	2019	Diff:
Kalashnikov	65	67	+2
Kala Kov	7	11	+4
Rifle	17	19	+2
Shot Gun	96	161	+65
Pistol	287	232	-55
Rounds	5444	10074	+3630
LMG / Stan Gun/Papasha	-
Hand Grenade	4	4	-
Dagger / Knives	..	2	+2
Detunator	-
Prima Card	-
Safety Fuse	-
Bombs	-
RPG / Gola	1	2	+1
Explosive Material	1050	..	-1050
Proclaim Offenders	297	204	-93
Military Documents	-
Total	7076	10836	+3760

NARCOTICS

Narcotics	2018	2019	Diff:
Chirs	16840	163575	+136735
Heroin	6390	2695	-2495
Cocain	1110	0120	-1190
Liquor	..	581L	+581L
Ice	..	0010	+0010
Bang	..	0820	+0820
Total	24540	167425	+132885

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
100 Cr P.C	5	7	+2
100 Cr P.C	1078	1335	+257
100 Cr P.C	221	192	-29
100 Cr P.C	16	3	-13
Total	1320	1537	+217

Police Deptt:

District Lakki Marwat.

**CIRCLE NAURANG (MONTHLY))
COMPARATIVE RECOVERY OF ARMS & AMMUNITION.**

01.06.2018-19 to 30.06.2018-19

Weapons	2018	2019	Diff:
Kalashnikov	9	15	+6
Kala Kov	3	--	-3
Rifle	3	6	+3
Shot Gun	36	28	-8
Pistol	71	69	-2
Rounds	2134	2058	-76
LMG / Stan Gun/Papasha	--	--	--
Hand Grenade	1	--	-1
Dagger / Knives	1	--	-1
Detonator	--	--	--
Prima Card	--	--	--
Safety Fuse	--	--	--
Bombs	--	--	--
RPG-7 Gola	--	--	--
Explosive Material	--	--	--
Proclaim Offenders	50	44	-6
Military Deserters	--	--	--
Total	2308	2219	-89

NARCOTICS

Narcotics	2018	2019	Diff:
Chars	2.855	10.220	+7.365
Heroin	1.560	0.300	-1.260
Opium	--	--	--
Liquor/ Bang	--	--	--
ICE	--	--	--
Total	4.415	10.520	+6.105

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
106 Cr.P.C	--	--	--
107 Cr.P.C	278	341	+63
109 Cr.P.C	37	60	+23
110 Cr.P.C	3	--	-3
Total	318	401	+83

CIRCLE NAURANG (UPTO DATE)
COMPARATIVE RECOVERY OF ARMS & AMMUNITION.

9

01.01.2018-19 to 30.06.2018-19

Weapons	2018	2019	Diff:
Kalashnikov	74	82	+8
Kala Kov	10	11	+1
Rifle	20	25	+5
Shot Gun	130	189	+59
Pistol	264	301	+37
Rounds	8578	12132	+3554
LMG / Stan Gun/Papasha	--	--	--
Hand Grenade	5	4	-1
Dagger / Knives	1	2	+1
Detonator	--	--	--
Prima Card	--	--	--
Safety Fuse	--	--	--
Bombs	--	--	--
RPG-7 Gola	1	2	+1
Explosive Material	1,050	--	-1,050
Proclaim Offenders	307	308	+1
Military Deserters	--	--	--
Total	9300	13056	+3756

NARCOTICS

Narcotics	2018	2019	Diff:
Chars	20,095	163,795	+143,700
Heroin	0.050	3,195	+3,145
Opium	1,310	0.120	-1,190
Liquor	--	5 BTL	+5 BTL
Ice	--	0.010	+0.010
Bang	--	0.820	+0.820
Total	28,555	167,125	+138,570

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
106 Cr.P.C	5	7	+2
107 Cr.P.C	1358	1608	+252
109 Cr.P.C	258	243	-15
110 Cr.P.C	19	3	-16
Total	1638	1831	+193

CIRCLE NAURANG (MONTHLY))
COMPARATIVE RECOVERY OF ARMS & AMMUNITION.

01.07.2018-19 to 31.07.2018-19

Weapons	2018	2019	Diff:
Kalashnikov	4	20	+16
Kala Kov	2	1	-1
Rifle	2	7	+5
Shot Gun	19	18	-1
Pistol	77	41	-36
Rounds	1672	1705	+33
LMG / Stan Gun/Papasha	--	--	--
Hand Grenade	--	1	+1
Dagger / Knives	1	3	+2
Detonator	--	--	--
Prima Card	--	--	--
Safety Fuse	--	--	--
Bombs	--	--	--
RPG-7 Gola	--	--	--
Explosive Material	--	--	--
Proclaim Offenders	23	71	+48
Military Deserters	--	--	--

NARCOTICS

Narcotics	2018	2019	Diff:
Chars	4 045	7 080	+2 435
Heroin	0 373	3 980	+3 607
Opium	--	--	--
Liquor/ Bang	--	--	--
ICE	--	0.200	+0.200

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
106 Cr.P.C	--	--	--
107 Cr.P.C	310	405	+95
109 Cr.P.C	36	70	+34
110 Cr.P.C	--	--	--

Police Deptt:

District Lakki Marwat.

CIRCLE NAURANG (UPTO DATE)

COMPARATIVE RECOVERY OF ARMS & AMMUNITION.

01.01.2018-19 to 31.07.2018-19

11

Weapons	2018	2019	Diff:
Kalashnikov	79	102	+23
Kala Kov	12	13	+1
Rifle	24	32	+8
Shot Gun	152	210	+58
Pistol	348	344	-4
Rounds	10508	13781	+3273
LMG / Stan Gun/Papasha	--	--	--
Hand Grenade	5	5	--
Dagger / Knives	2	4	+2
Detonator	--	--	--
Prima Card	--	--	--
Safety Fuse	--	--	--
Bombs	--	--	--
RPG-7 Gola	1	--	-1
Explosive Material	1050	--	-1050
Proclaim Offenders	330	380	+53
Military Deserters	--	--	--

NARCOTICS

Narcotics	2018	2019	Diff:
Chars	28840	170105	+144265
Heroin	7323	6925	-0398
Opium	1310	--	-1310
Liquor	--	560	+560
Ice	--	0210	+0210
Bang	--	0820	+0820

PREVENTIVE ACTION

PREVENTIVE	2018	2019	Diff:
106 Cr.P.C	5	8	+3
107 Cr.P.C	1748	2140	+392
109 Cr.P.C	294	307	+13
110 Cr.P.C	19	3	-16

12 "B"

Kingdom

Commissioner of Police

NO. 25/2560 GO W/ICP OFFICE



Police

Commissioner of Police

CLASS

Created by

Inspector General of Police, Higher Education

INSPECTION OF POLICE

TO

Son of

District

RECOMMENDATION OF THE COMMISSIONER OF POLICE
FOR THE GRANT OF AWARD
FOR MERIT BY THE GOVT. OF INDIA

Date: 04 / 08 / 2015

Inspector General of Police

Regional Police

13



Commendation Certificate

COL. 10333 H

Granted by

Mr. Abdullah Khan P.S.P.

REGIONAL POLICE OFFICER BANNU REGION BANNU

To Mr. Shafiq Khan DSP Naumanj.

Sum of

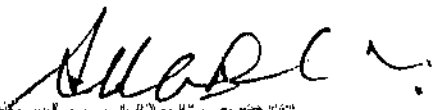
District Larki Naumanj.

In Recognition of

his Good Performance in Case vide FIR No. 208
Dt. 18-3-2019 4/1 506A-216. 9AF-15AA/148-149 P.P.
P.S. Naumanj.

Cash Reward Rs. 3000/-
NO-1663-64

Dated 19-3-2019


Regional Sub-Officer
Bannu Region Bannu



Commendation Certificate

CLASSIFIED III
Granted by

MR: Asif Gohar DPO Lakki
DISTRICT POLICE OFFICER LAKKI MARWAT

To MR: Shefiq ur Rahman S.D.P.O. Naurang
Sam of _____
Identical _____

In recognition of
Good Performance in Good duty

Cash Reward Rs. 2000/-

DIR No: _____
Dated: _____/_____/20__

(Signature)
District Officer

Better C

EXPLANATION

INSPECTOR SHAFIQ UR REHMAN
SDPO NAURANG

No.442/PA

dated: 28.05.2019

It is stated that your overall progress and supervision are very low and totally failed. You are repeatedly directed to improve your progress but you are not interested in performing your official duty. Crimes against persons & property are also increasing day by day in your circle. You have no control over crimes. The worthy regional police officer bannu region bannu has also checked the patrolling (Gash) in your circle but found unsatisfactory which speak your disinterest in the discharge of official duty.

In view of the above you are therefore, directed to explain your position within three days of the receipt of this notice. In case your reply is not received within the stipulated period, it shall be presumed that you have no defense to offer and the undersigned would be at liberty to pass ex-parte action straight away against you.

Abdul Hayee
District Police Officer
Lakki Marwat.

No.443/PA dated 28.05.2019



C.
15

EXPLANATION.

INSPECTOR SHAFIQ UR REHMAN
SDPO NAURANG

No. 444 P.A.

Dated 23/05/2019.

It is stated that your overall progress and supervision are very low and totally failed. You are repeatedly directed to improve your progress but you are not interested in performing your official duty. Crimes against persons & property are also increasing day by day in your circle. You have no control over crimes. The Worthy Regional Police Officer Banna Region Banna has also checked the panchling condition in your circle but found unsatisfactory which speaks your disinterest in the discharge of official duty.

In view of the above you are therefore directed to explain your position within three days of the receipt of this notice. In case your reply is not received within the stipulated period, it shall be presumed that you have no defense to offer and the undersigned would be at liberty to proceed with action straight away against you.

(Abdul Hayee)
District Police Officer,
Lakki Marwar.

No. 444 P.A. dated 23/05/2019.

Copied to the Worthy SDPO Banna Police Station for their information.
Date:

442/PA
28-5-19
GPO

لیکچرٹ خصوصاً ہوں کہ جناب مہروری نے سہیل نورنگ کی
تعمیر پیراگرس - اور گشت غرضی کی پیش کرنے پر ناراضگی
کا اظہار کرتے ہوئے جو اب طلبہ جاری فرما کر ذیل عرض کرنا چاہتے ہیں

بنا = پیراگرس میں کھنوری کی بابت یہ کہہ رہے ہیں کہ
SH اور انچارجان تیسس کی کارروائی پر دیکھا جاتا ہے کہ
لوہا جس راضی کارروائی میں پدایات کے باوجود کھنوری
پر باقاعدہ رضوان یاد کو اس کے خلاف تیسری شکایات ہزار
فر کی گئیں۔ لیکن اسے ساری کارروائی میں کھنوری کے بارے کوئی
رعایت نہیں کی ہے۔ جبکہ ایچ آر ایس لف شدہ جو
سال گذشتہ آج لڑتے سال رواں ہیں یہ نوٹنگ میں مثبت ہے

بزرگ۔ جہاں تک پیراگرس میں ہیں کہتے ہیں کہ پیراگرس
جس نے ناراضگی کا اظہار کیا وہ یہ کہتے ہیں کہ سہیل نورنگ میں ناراضگی
پہلے ہی جب کھنوری کی تیسس میں آئی اب باقاعدہ میں
پہلے بیٹ ماڈر 2-1-2 + 1-2 + 1-2 + 1-2 + 1-2 + 1-2 + 1-2
کی طور پر 29 کو جناب RPO کو نوٹ دیکھے ہیں اور
پیر جناب RPO سے من DSP اور ADSP کے مددگت ہو چکے ہیں
اور نیز یہ کہی ہوگی کہ سہیل نورنگ سے عید الخط
حساب ریش کے لحاظ سے شمالی ڈیوٹی یا جانب کا بیان عرض ہے

442/PA
28-5-19
GPO

SHO نورنگ کو زبیرہ تہا کہہ کرے براہ فرما کر
ان کی درخواستیں ہیں دی ہے جو لف ہے۔

"E"

17



OFFICE OF THE INSPECTOR GENERAL OF POLICE HYDERABAD PAKHTUNKHWA

Central Police Office, Peshawar

No. SI 3651 /2020, Dated Peshawar the 27/09/2020.

Confidential/In-duplicate

To: The Regional Police Officer, Bannu Region, Bannu
Subject: ACR/COMMUNICATION OF ADVERSE REMARKS
Memo:

In the Annual Confidential Report on the working of Inspector Shafiq-ul-Rahman, No. K/17 Acting SPO/Hanwanj Circle District Lakkai Marwan for the period year 01.04.2019 to 25.07.2019 it has been mentioned that

Remarks of the Reporting Officer:

Class of Superintendent of Police's Report
Is he honest?.....Reportedly a corrupt officer

Remarks:-

- 1. His overall progress was very low. Command was very weak and lack of supervision. During his tenure crime against persons and property were increased. He had no control over crimes. He was affiliated with locals for corruption and sending SMS on citizen portal against SPOs and other officers.
2. A letter of displeasure was issued to him No. 501/PA, dated 17.06.2019
3. A letter No. 500/PA, dated 17.06.2019 was sent to RPO Bannu for his transfer and departmental action against him
4. A explanation No. 442/PA dated 28.05.2019 was issued to him.
5. Reportedly he was a corrupt officer and there were many complaints of corruption against him
6. Many times he was called to go office for reporting but he failed to change his behavior
W/A-Session Judge "Hunda Daud Shah" wrote up must have in his judgment and a departmental inquiry was initiated against him and found guilty
8. Due to his inefficiency roads were blocked and Police Post "GASBI" was burnt and ultimately. He was charged for PO, Blue, Orange and Black Sheep to Police Department

cc for further process please

Handwritten signature

DPO Bannu Region, 1st Counterbalancing Officer, Karachi (H/P)
DPO Lakkai to convey him to Adress
2nd Counterbalancing Officer, Karachi

Convey as adverse remarks

The above adverse remarks may please be conveyed to the official concerned in order that he may remedy the defects. Representation if made should be made not later than one month from the date of receipt of this communication.

The acknowledgment as below of the receipt of this memo may be obtained from him on the attached copy. One copy of this communication is forwarded to this office for record in his Charge Sheet File.

KASHIF ALI QADIR PSE
ACB Establishment,
For Inspector General of Police,
Hyderabad Paktunkhwa Peshawar

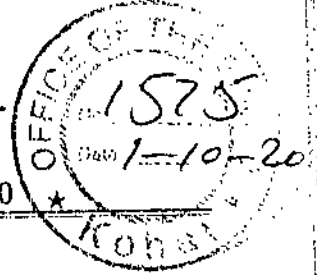
Handwritten signature



OFFICE OF THE,
DY: INSPECTOR GENERAL OF POLICE,
COUNTER TERRORISM DEPARTMENT,
KHYBER PAKHTUNKHWA, PESHAWAR.

Ph#: 091-9212518-19 Fax#: 091-9212530

No. 11862-63/PA, Dated: 29/09/2020



To: The Superintendent of Police,
CTD, Kohat Region.

Subject: ACR/COMMUNICATION OF ADVERSE REMARKS.

Memo:

Enclosed please find RPO Bannu Memo:2392/PA dated 23-09-2020,
on the subject cited above.

The adverse Remarks on the working of Inspector Shafiq-ur-Rehman
No. K/17 the then Acting SDPO/Naunung Circle District Lakki Murwat for the
period **04.04.2019 to 25.07.2020** presently serving in your command as a
Acting DSP CTD Hangu.

The acknowledgment as token of receipt of the memo may be
obtained from him on the attached duplicate copy of this communication for
onward submission to the quarter concerned.

SP/HQrs:

For Deputy Inspector General of Police,
CTD Khyber Pakhtunkhwa,
Peshawar.

Copy forwarded to:

1. The Regional Police Officer, Bannu Region w.r.t his office memo No.
quoted above.

Better F

INSPECTOR SHAFIQ UR REHMAN SDPO NAURANG CIRCLE.
LETTER OF DISPLEASURE

It is stated that your overall progress is very low, command is weak and lack of supervision. You are repeatedly directed to improve your progress but you are not interested in performing your official duty. Crime against persons & property are also increasing in your circle day by day. You have no control over crimes. In Police Station Dadiwala two FIR's of same place of occurrence have been registered despite clear order of Supreme Court and clear instructions of Worthy I.G.P. KPK. You haven't took interest to trace the Heinous Offences of Deaths occurred in Police Station Naurang vide Case FIR No.402 dated 27.05.2019 u/s 457/380 PPC and Police Station Gambila vide FIR No. 113 dated 23/05/2019 u/s 395/148/149 PPC. Some touts are also affiliated with and you are also promoting tout-ism and your touts are also giving applications against Police Officers of Distt. Lakki Marwat with your conspiracy. The Worthy Regional Police Officer Region Bannu has checked the patrolling (Gasht) in your circle but found unsatisfactory, which speaks your disinterest in discharged official duty.

Now, therefore, I, Abdul Hayee, District Police Officer, Lakki Marwat sh
displeasure against you.

(ABDUL HAYEE)
District Police Officer
Lakki Marwat

No. 501-02/PA Dated:12/06/2019

φ


"F"
19

DIRECTOR SHAFIUR RAHMAN SDPO NAURANG CIRCLE.

LETTER OF DISPLEASURE.

It is noted that your overall progress is very low, continued absence and lack of supervision. You are repeatedly directed to improve your progress but you are not interested to perform your official duty. Crimes against persons & property are also increasing day by day in your circle. You have been visited even crimes in Police Station Dadiwala two FIRs of same place of occurrence have been directed to quash the order of Supreme Court and clear instructions of Worthy Inspector General of Pol. Khyber Pakhtunkhwa. You were also not took interest to trace the reasons of offences of Theft occurred Police Station Naurang vide Case FIR No 02 dated 27.07.2019 and 24590 PPC and at Police Station Gumbala vide FIR No 113 dated 23.08.2019 and 5951 B/19 PPC. Some tours are also affiliated with you and you are promoting tourism and your tours are giving applications against Police Officers of District Muzaffargarh with your complicity. The Worthy Regional Police Officer Barmer Region Barmer has a checked the list of officers working in your circle but found great deficiency which is not your best interest in a sense of official duty.

Now I direct you to work hard as District Police Officer, Palki Marwat in compliance with this order.


R. Palki Marwat
District Police Officer
Palki Marwat

No. 500-02/PA. Dated 12.08.2019. 06

Copy of this order is submitted to the Regional Police Officer, Barmer Region, Barmer for their consideration and follow up.

To:-

The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

"G"
20

Through:- PROPER CHANNEL

Subject:- REPRESENTATION

Respected Sir,

With due respect appellant submit representation against the adverse remarks for the period with effect from 04-04-2019 to 25-07-2019 (Three months & 21 days) recorded in the PER of petitioner by the then DPO Lakki Marwat Mr. Abdul Hayee

Facts

1. That the appellant was posted as SDPO Naurang Circle District Lakki Marwat w.e from 09.11.2018 to 19.08.2019.
2. That out of the total posting period of ten months as SDPO Naurang Circle, appellant worked for 03 months and twenty one days under the subordination of Reporting Officer who recorded the impugned adverse remarks.
3. That the remarks were recorded due to personal annoyance of the Reporting Officer and were outcome of the grudges developed on personal matters. Therefore, appellant submits the representation for expunction of the impugned remarks on the following grounds:-

GROUND

- A. The impugned remarks of the Reporting Officer is vague and sketchy, the remarks are not free from bias, prejudice, ill-will and rancour against the appellant developed by the Reporting Officer. An purpose of personal grudges the Reporting Officer has wrongly incited in the impugned remarks that overall progress and command and supervision of the appellant was low. He has recorded the impugned remarks without consulting the record and properly evaluating the performance of appellant. The comparative statement of the crime recovery for the period when appellant was holding the charge of SDPO Naurang Circle are enclosed **08 pages** of annexure "A", which clearly reveals that the Police of the Circle showed good performance as against the corresponding period of the previous year. Furthermore, the impugned remarks are not based on facts as Regional Police Officer Bannu and predecessor of the author of the impugned remarks rewarded to the appellant with commendation certificates and cash rewards during the posting period of the appellant as SDPO Naurang Circle which bolter the impugned remarks vide placed at annexure "B,C".

- B. That the Reporting Officer preceding the author of the impugned remarks rated appellant as good for the preceding period. The human conduct does not changed abruptly; appellant was noted good officer by the predecessor of author of the impugned remarks which clearly shows that impugned remarks were recorded due to personal grudges. This is also worth mentioning here that the Reporting Officer was personal against appellant with the cogent reason that he withdrawn the double Cabin vehicle which is already in the name of SDPO Nuarang under the charge of appellant without passing any written order in 25 April 2019. He allotted an old vehicle for duty to appellant from Police Lines Lakki Marwat.
- C. That the Reporting Officer has wrongly pointed out that the appellant was involved in causing damaged to the reputation of the SHO's under the command of the appellant. The remarks are not less than white lie. The appellant was having good relation with all SHOs and worked as a team and showed good performance. Actually the reporting officer had directed all SHOs not to cooperate with the appellant but they being professional officer did not honours the oral order of the reporting officer. The matter could be enquired into by examining Zaheer Khan, Said Ayaz, Muhammad Ayaz, Niaz Muhammad, Gul Muhammad and Farmanullah SI's of Bannu Region who worked as SHO under the command of appellant during the period under review.
- D. That the personal grudges of Reporting Officer are proved from the fact that he has referred to the events of disciplinary proceeding initiating against appellant in connection with investigation of case register at Police Station Banda Daud Shah District Karak. Actually the reporting officer while posted as SP Investigation Bannu was appointed as enquiry officer. In the said proceedings initiated against appellant and he reported appellant as guilty of the charges but the RPO Bannu was pleased to disagree with the enquiry officer and exonerated the appellant. This is also important to point out that appellant was rewarded by worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar in recognition of conducting good investigation copy enclosed at annexure "D".
- E. That the personal grudges of reporting officer are also proved from the fact that he has referred to the event reported in District Lakki Marwat which took place after his transfer. The event did not occurred in his posting period.
- F. That Reporting Officer has not referred to any specific instance of lapses and omission on the part of appellant which may prove the low command and supervision of appellant. Furthermore, reporting officer has not referred to any material and tangible evidence and credible information in support of the baseless remarks of involvement of appellant in corruption. No doubt an explanation and letter of displeasure was issued to appellant by the Reporting

Officer but no allegations and reference to involvement of appellant in corruption was made which prove mala-fide of the Reporting Officer. Explanation copy places at annexure E, F & G for perusal.

- G. That the reporting officer has rated as "A" all the SHOs who were under the command of appellant during the impugned period which clearly reveals that the command and supervision of appellant was good and the Reporting Officer as wrongly declared the command of appellant as low.
- H. That the Reporting Officer has wrongly laid down in the impugned remarks that learned RPO Bannu took adverse notice of weak beat duties in Naurang Bazar. Actually there was shortage of strength and appellant placed several request before Reporting Officer for provision of additional strength but he turned deaf ear to the requests. He deployed additional strength after receipt of directions from RPO Bannu.
- I. That the remarks pertains to year 2019 and were conveyed on 01.10.2020 vide placed at annexure "H", the late dispatch of the remarks also prove mala-fide of the Reporting Officer placed at annexure "I".
- J. The appellant had already completed the prescribed period of 03 months under the command of Reporting Officer. The Reporting Officer took charge of DPO Lakki Marwat in April 2019 and he withdrew double Cabin vehicle from appellant on and also directed the SHO's not to oblige the command of appellant and appellant on seeing the adverse attitude of Reporting Officer against appellant, submitted an application of earned leave and also placed oral request for transfer of appellant. Therefore actually appellant has served for a period of less than one month under the command of Reporting officer and he has wrongly evaluated the performance of appellant.

It is therefore requested that the impugned remarks may please be expunged and oblige.

Dated 05-10-2020

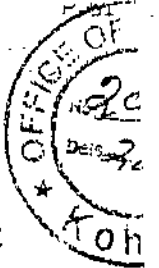
RI Pages

Yours faithfully

Shahid Mirza

DSP/DFU-CTD Hangu.

23



**OFFICE OF DEPUTY INSPECTOR GENERAL OF POLICE, CTD
KHYBER PAKHTUNKHWA, PESHAWAR.**

No 15939 /EG/CTD

Dated Peshawar the 18/12/2020

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

1. Superintendent of Police, CTD Kohat Region to inform DSP Shafiq Ur Rehman accordingly w/c to your office Memo: No. 2898/CTD dated 21-10-2020, please.

SP/HQrs:

For Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa,
Peshawar

DSP / shafiq ur rehman
for information

Sd/-
22/12/20

Sd/-
17/12/2020

24

32

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

No. SI/4906-120, Dated Peshawar the 17/12/2020.

ORDER

This order pertains to the representation preferred by Inspector Shafiq-ur-Rahman, No. K/17 the then Acting SDPO/Nauranga Circle District Lakki Marwat for the expunction of Adverse Remarks contained in his ACR for the period from 04.04.2019 to 25.07.2019 recorded by the reporting officer. The same was endorsed by the RPO/Bannu Region.

Comments were also obtained from reporting officer. The reporting officer has intimated that he was issued a letter of Displeasure vide No. 501-02/PA, dated 12.06.2019. He was called to DPO Office many times and advised him to mend his way but in vain as he failed to change his behavior.

After going through the relevant record, comments and material on record the Adverse Remarks recorded in his ACR for the period from 04.04.2019 to 25.07.2019 are maintained and his representation is hereby rejected and filed.

Sd/-
DR. ISHTIAQ AHMED, PMS/PS
Additional IGP/HQs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. SI/4907-10/2020.

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

1. Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar w/r to his memo: No. 1343/BC/CTD, dated 28.10.2020. Necessary entry into this effect may also be made in his Character Roll Dossier. The applicant may also please be informed accordingly.
2. Supdt. of Police, HQs: CTD, Peshawar.
3. Office Supdt. "B-II" Branch, CPO.

EC
SP/HQs
17/12/2020

(ZAHID KHAN AFRIDI) PSP
AIC/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

25

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2021

Shajia ur Rehman (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Department. (RESPONDENT)
(DEFENDANT)

I/We Shajia ur Rehman
Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, 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. ____/____/2021

[Signature]
CLIENT
ACCEPTED
NOOR MOHAMMAD KHATTAK
MIR ZAMAN SAFI
AFRASIAB KHAN WAZIR
&
HAIDER ALI
ADVOCATES

OFFICE:
Flat No.4, 2nd Floor, Juma Khan
Plaza, near FATA Secretariat,
Warsak Road, Peshawar.
Mobile No.0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1622/2021.

Mr. Shafiq Ur Rehman, DSP/DFU,
Counter Terrorism Department at Hangu.

(Appellant)

VERSUS

- 4) Provincial Police Officer KPK Peshawar.
- 5) Regional Police Officer Bannu Region, Bannu.
- 6) District Police Officer Lakki Marwat.

(Respondents)

INDEX

S.No	Description	Annexure	Page
1.	Affidavit		1
2.	Para wise Comments		2-3
3.	Authority Letter		4



Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
Appeal No. 1622/2021.

Mr. Shafiq Ur Rehman, DSP/DFU,
Counter Terrorism Department at Hangu.

(Appellant)

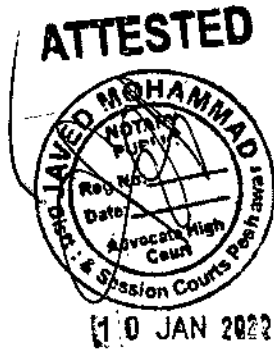
VERSUS

- 1) Provincial Police Officer KPK Peshawar.
- 2) Regional Police Officer Bannu Region, Bannu.
- 3) District Police Officer Lakki Marwat

(Respondents)

AFFIDAVIT

I, Younas Khan SI Legal Representative for Respondents do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by me are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable court.



DEPONENT
11201-4689912-8
0315-9465570

Mr. Shafiq Ur Rehman, DSP/DFU,
Counter Terrorism Department at Hangu.

(Appellant)

VERSUS

1. Provincial Police Officer KPK Peshawar.
2. Regional Police Officer Bannu Region, Bannu.
3. District Police Officer Lakki Marwat.

(Respondents)

Para wise comments by Respondents: -

Respectfully Sheweth:

PRELIMINARY OBJECTIONS

1. That the appellant has no cause of action and locus standi to file the appeal.
2. That the appeal is not maintainable under the law.
3. That the instant appeal is barred by law & limitation.
4. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
5. That the appeal is badly time-barred.
6. That the appellant has concealed the material facts from the Honourable Tribunal.

OBJECTIONS ON FACTS

1. Pertains to record.
2. In-correct: In-fact the appellant during his service in District Lakki, the respondent No.3 being competent authority observed and found the command of the appellant very weak, loose, lack of supervision and overall progress weak in performance of official obligation. Besides crime against persons and property were increased and no control over crimes, also affiliated with louts for corruption and sending SMS on citizen portal against SHOs and other fellow officers. During the period of service in District Lakki Marwat the appellant showed unsatisfactory performance despite repeated directions issued time & against to the him, but the appellant failed to comply with the directions of the R.No.3 (competent authority).
3. Correct to the extent that upon the unsatisfactory performance, an explanation was called from the appellant by R.No.3 vide No.442 dated 28-05-2019, which was replied by the appellant and reply of the appellant was found unsatisfactory / unacceptable. (Copy of explanation & reply already annexed by appellant as 'C & D').
4. In-correct: That despite repeated directions issued to the appellant by R.No.3 regarding improving of performance and crime control in his jurisdiction, the appellant did not even bother to comply with directions and violated the lawful orders of the authority, thus upon the inefficiency / unsatisfactory performance of the appellant, the respondent recorded adverse remarks against the appellant. (Copy of ACR & letter already annexed by appellant as E & F)

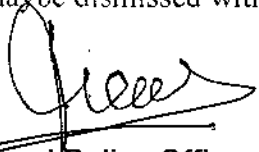
5. Correct to the extent that the appellant submitted departmental appeal before Respondent No.1 against the adverse remarks of R.No.3 and after going through the relevant record / material the adverse remarks were maintained and appeal was rejected and filed by the authority.
6. The appellant has wrongly assigned the lawful and legal orders of respondents through unsound ground.


OBJECTION ON GROUNDS

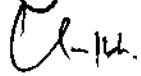
- A. In-correct: the order of the respondents were passed in accordance with law, facts and based on justice.
- B. In-correct: The appellant has been treated in accordance with law / rules and no violation of any rules were made by the respondents.
- C. In-correct: The appellant was served with explanation / displeasure notice already explained in above Para's, but the appellant failed to satisfy the Respondents, therefore being reporting officer (Respondent No.3) recorded adverse remarks in ACR of the appellant.
- D. In-correct: full opportunity of self-defense / personal hearing was afforded to the appellant, but he failed to satisfy the respondents regarding his poor performance / lack of interests in discharge of official duty.
- E. In-correct: The appellant were repeatedly called to the office of respondent No.3 and advised him to mend his way, but in spite of directions, the appellant failed to change his behaviour.
- F. In-correct: Proper explanation / displeasure notice were issued and served upon the appellant, but he violated the law and being member of discipline force, failed to follow up the directions / instructions of the competent authority.
- G. The respondents also seek permission to raise additional grounds during the course of advancing arguments.

Prayer:

It is humbly requested that the appeal is based on wrong footings, therefore the same maybe dismissed with costs, please.


**Regional Police Officer,
Bannu Region, Bannu
(Respondent No. 2)**


**Inspector General of Police
KPK, Peshawar
(Respondent No.1)**


**District Police Officer,
Lakki Marwat
(Respondent No.3)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1622/2021.

Mr. Shafiq Ur Rehman, DSP/DFU,
Counter Terrorism Department at Hangu.

(Appellant)

VERSUS


- 1) Provincial Police Officer KPK Peshawar.
- 2) Regional Police Officer Bannu Region, Bannu.
- 3) District Police Officer Lakki Marwat.

(Respondents)

AUTHORITY LETTER

Mr. Younas Khan SI/Legal is hereby authorized to appear before the Honourable Peshawar High Court on behalf of the undersigned in the above cited titled case.

He is also authorized to submit and sign all documents pertaining to the present subject Writ Petition.


District Police Officer,
Lakki Marwat
(Respondent No.3)