

# FORM OF ORDER SHEET

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

**Appeal No.**

**1835/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/09/2023	<p>The appeal of Mr. Shafī Ullah received today by registered post through Sheikh Istikhar ul Haq Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. 1835/2023

Shafi Ullah

**VERSUS**

Inspector General of Police and others

**SERVICE APPEAL**

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Date: 06/09/2023

Yours Humble Appellant

*Shafi Ullah*

Through Counsel,

*M. Iftikhar ul Haq*

Advocate Supreme Court

03459785920

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. 1835 /2023

**Shafi Ullah** son of Izat Khan caste Marwat r/o Wanda Dost  
Muhammad Shadi Khel District Tank. Ex-Constable Elite Force  
Cell#0344-7540740

**Appellant**

**Versus**

1. Provincial Police Officer (IGP), Khyber Pakhtunkhwa, Peshawar.
2. Additional Inspector General of Police, Elite Force Khyber Pakhtunkhwa Peshawar.
3. Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar.
4. SP Elite Force Khyber Pakhtunkhwa Peshawar.
5. District Police officer Dera Ismail Khan.
6. Director Finance Officer of Elite Force Khyber Pakhtunkhwa Peshawar.

**.....Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICES  
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER 6578-  
85/EF DATED 30/06/2022 of respondent#3 VIDE WHICH  
THE APPELLANT IS DISMISSED FROM SERVICE FROM THE  
DATE OF ALLEGED ABSENCE I.E. 31/03/2022 WITHOUT ANY  
LAWFUL JUSTIFICATION AS WELL AS AGAINST THE ORDER  
OF APPELLATE AUTHORITY (RESPONDENT#2) BEARING NO.  
92565-70/EF DATED 08/09/2022 VIDE WHICH THE  
DEPARTMENT APPEAL OF APPELLANT WAS FILED MEANING  
THEREBY REJECTED AND ALSO AGAINST THE IMPUGNED  
ORDER NO. 2203-09/23 DATED 28/08/2023 ISSUED BY THE  
WORTHY PROVINCIAL POLICE OFFICER/IGP  
RESPONDENT#1/REVISIONAL AUTHORITY.**

PRAYER

On acceptance of the instant Service Appeal the impugned order dated 30/06/2022 of respondent#3 and also against the order of the appellate authority (respondent#2) dated 08/09/2022 as well as the order of the revesional/higher appellate authority dated 28/08/2023 issued by the respondent#1 may please be set aside and the appellant may kindly be reinstated into service with all back benefits including the back benefits from 31/03/2022 and onward.

Respectfully Sheweth:-

The Appellant most respectfully submits as under:-

**BRIEF FACTS:**

1. That the appellant was appointed as Constable in the incumbency of respondents/authority on 01/01/2011 in Frontier Reserve Police Dera Ismail Khan/Tank after observing all the legal and codel fulfillments and later on the services of the appellant was transferred to the Elite Force due to satisfactory services of the appellant and also allotted belt No. 1429 Platoon No. 101. Copy of the service card is annexed as Annexure-A.
2. That the appellant performed his duties to the entire satisfaction of his superiors. Moreover, during the whole tenure of services, the appellant never availed any leave during the whole career of services and thus on the career of the appellant in eleven year services hundreds of leaves in appellant's credit.
3. That during the performance of duty the appellant was falsely implicated in case FIR#76 dated 01/04/2022 u/s 302,324/34 PPC registered at P.S Gul Imam District Tank because the appellant was the only earned person of the family and being elder to just sabotage the family honour/dignity of the appellant's family. Copies of the FIR with relevant documents are jointly annexed as Annexure-B.

4. That due to the dignity and honour of the appellant and due to the fear of local police to save skin of his life from the dishonouring of the appellant in the locality being Pathan Belt Society the elders of locality submitted to the complainant party of the aforementioned FIR that the appellant is a noble person of his family, society and locality and innocent in the instant case, therefore, the appellant be exonerated from the criminal case and thus complainant party agreed on the basis of compromise/بدل صلح and thus the appellant submitted Bail before arrest petition/ad interim bail which was confirmed on 07/09/2022 by the competent court/Additional Sessions Judge-I Tank, later on the appellant was acquitted from the charges leveled against him on 27/10/2022. Copies of the documents regarding BBA and acquittal with relevant documents are annexed as **Annexure-C.**
5. That actually as stated above the appellant was constructively on duty and never remained absented but due to the compelling circumstances, after patch-up the matter and confirmation of interim bail petition the appellant came into knowledge that appellant has been dismissed retrospective effect from service at the back of appellant vide impugned order No. 6578-85/EF dated 30/06/2022 on the allegation that appellant remained absent from duty w.e.f. 31/03/2022 till to date. Copy of the impugned order dated 30/06/2022 is annexed as **Annexure-D.**
6. That after came into the knowledge about the impugned order, the appellant submitted departmental appeal on 08/09/2022 after confirmation of ad interim bail on 07/09/2022 to the appellate authority i.e. respondent #2. It is pertinent to mention here that the departmental appeal is in custody of respondents, the appellant also made an application under right to information Act but in vain.
7. That after submitting the departmental appeal the appellant suffered from unavoidable circumstance and critical financial situation as growing inflation in the country and after payment of بدل صلح to the complainant party the appellant was

like a dead person was awaiting for the result of the departmental appeal. Later on after passing some time in weakest health and financial crises condition the appellant approached himself to the Inspector General of Police, wherein the appellant came into knowledge that departmental appeal of the appellant is reject and on the same date i.e. 08/09/2022 vide order No. 9265-70 dated 08/09/2022. Copy of the order dated 08/09/2022 is annexed as **Annexure-E.**

8. Thereafter the appellant after came into knowledge about aforementioned impugned appellate authority order on 04/05/2023 submitted a revision petition before the respondent#1 under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) on the same date i.e. 04/05/2023 but the same was also rejected on 28/08/2023. Copies of revision petition dated 04/05/2023 and rejection order dated 28/08/2023 are annexed as **Annexure-F & G.**  
*alongwith documents.*
9. That the appellant, being aggrieved from the afore mentioned impugned orders, the instant service appeal is being filed, inter alia, on the following grounds.

**GROUND:**

- a. That all the three impugned orders are against law, facts, natural justice, void ab initio, hence, liable to be set aside.
- b. That the impugned orders are against law, principle of service laws, policy, rules, regulations and also against the Police Rules, 1934 as amended in 2014 and is also not in the commence of EASTA Code.
- c. That no charge sheet, statement of allegations are even issued nor served on the appellant and on this sole ground the impugned orders are liable to be set aside. It is also pertinent to mention here that allegedly charge sheet, statement of allegations, final show cause notice has been placed/shown on the departmental file of the appellant at

*in file  
R.S.*

the back, which is not in commence of Establishment Code.

- d. That no proper inquiry whatsoever was conducted by the respondents while issuing the impugned orders and thus, the impugned orders are liable to be set aside being issued in violation of law.
  - e. That after alleged show-cause notice no opportunity of personal hearing had been given to the appellant and on this sole ground the impugned orders are not sustainable in the eyes of law, because the stance of the respondents/authority is contradictory, on one pretext the appellant has been shown absent from duty being fugitive formula and on the other hand they alleged that the statement of allegations charge sheet has served upon the appellant, meaning thereby the appellant never absented himself and constructively was on duty due to aforementioned unavoidable circumstances.
  - f. That the impugned order is also not sustainable in the law, because in the light of verdicts of superior courts every acquittal become Honourable when the same has been passed by the competent court of law being on the basis of compromise or otherwise.
  - g. That the whole proceedings (although not admitted) whatsoever has been done by the respondents/authority in slipshod manner expeditiously without comes into mind the critical conditions of the appellant and on the basis of humanitarian grounds the impugned orders are also liable to be quashed.
  - h. That no charge sheet, initial show-cause notice, final show cause notice and statement of allegations were issued against the appellant, in short no inquiry whatsoever had been conducted in the case of appellant, hence, the impugned dismissal order is against the norms of natural justice and liable to be set aside.
- jin h.s.c.*

- 6 -
- i. That the appellant is a poor fellow having family with children and there is no earning hand except the service of appellant, hence, the service of appellant is liable to be reinstated along with all back benefits.
  - j. That counsel for appellant may kindly be allowed to raise additional grounds at the time of arguments.

**It is therefore, humbly prayed that on acceptance of the instant Service Appeal the impugned order dated 30/06/2022 of respondent#3 and also against the order of the appellate authority (respondent#2) dated 08/09/2022 as well as the order of the revesional/higher appellate authority dated 28/08/2023 issued by the respondent#1 may please be set aside and the appellant may kindly be reinstated into service with all back benefits including the back benefits from 31/03/2022 and onward.**

Date: 06/09/2023

Yours Humble Appellant



**Shafi Ullah**

Through Counsel



**Sheikh Iftikhar ul Haq**  
Advocate Supreme Court  
Cell#0345-9785920

- 7 -

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. \_\_\_\_\_/2023

Shafi Ullah

**VERSUS**

Inspector General of Police and others

**SERVICE APPEAL**

**AFFIDAVIT**

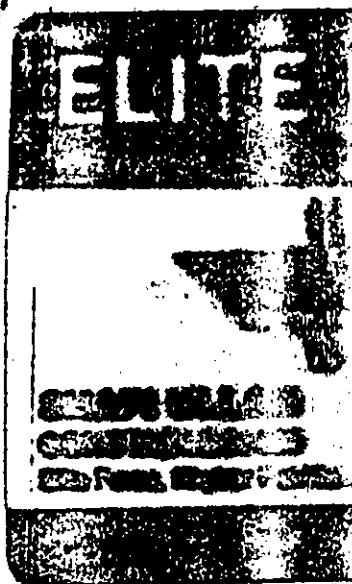
I, **Shafi Ullah** son of Izat Khan caste Marwat r/o Wanda Dost Muhammad Shadi Khel District Tank. Ex-Constable Elite Force, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: 06/09/2023

*Shafi Ullah*

**DEPONENT**

*Identified by  
initials  
( A.S. - )*



- 8 -

Ann  
"A"

Issue Date:	28-03-2002	V.	Expiry Date:	27-03-2003
Father's Name:	Rao Venkateswara			
CAC No.	22211001	Date:	18-03-2002	
Mark of Identification:	12	Date:	18-03-2002	
Mother's Name:	22211001	Date:	18-03-2002	
Present Address:	Gopuram Village, Pudukkottai, Tamil Nadu.			
Signature:				

Attested to be true  
copy

W. J. Glavin

## بِهَدَائِيِّ الْمُلَاقِيِّ لِوَرَاثَةِ

(فائل) ابتدائی اطلاع نسبت جم قابل دست اندازی پلیس رپورٹ شدہ زیروفہرست ۲۵ اگوست ضایف فوجداری

مطلع زند

نام و قو۰ر ۲۲/۰۵/۰۶ وقت ۳:۵۰ دلار ۸۶	تاریخ وقت رپورت ۲۲/۰۱/۱۰ وقت ۲۱-۲۱ بے	76
جائزہ ۱/۰۱/۲۲-۵۰ دلار	بازاری خودت رپورت ۲۲/۰۱/۱۰ وقت ۲۱-۲۱ بے	۱
نام و مکونت اطلاع دیند مستیش اسٹیل صان میول ۳ فرنگی کنڈی سکٹہ وانڈن ذرخ ۰۳۶۵-۹۳۳۷۸۳۱	نام و مکونت اطلاع دیند مستیش اسٹیل صان میول ۳ فرنگی کنڈی سکٹہ وانڈن ذرخ ۰۳۶۵-۹۳۳۷۸۳۱	۲
خفر کیشت بھرم (مع رفعہ) خال اُر کچھ یا کیا اور ۳۰۲/۳۲۰/۳۶	خفر کیشت بھرم (مع رفعہ) خال اُر کچھ یا کیا اور ۳۰۲/۳۲۰/۳۶	۳
چائے دادے ناصل تھانے سے اور سمت پر اپنے اپنے قیمتیں ادا کیں جو اس سرہ جو خفر کیشت نام و مکونت ملزمہ پاسکھ فراز (۲) شاخہ اللہ سید عالی عزت خلق افواہ صورت سکنازار داند دیوبند	چائے دادے ناصل تھانے سے اور سمت پر اپنے اپنے قیمتیں ادا کیں جو اس سرہ جو خفر کیشت نام و مکونت ملزمہ پاسکھ فراز (۲) شاخہ اللہ سید عالی عزت خلق افواہ صورت سکنازار داند دیوبند	۴
کاروائی جو تیش کے خلیل کی اک اطلاع دریج کرنے میں توقف ہوا اور توجہ بیان کرد برسیگی موسسه رپورت پر حمد دیکھا۔	کاروائی جو تیش کے خلیل کی اک اطلاع دریج کرنے میں توقف ہوا اور توجہ بیان کرد برسیگی موسسه رپورت پر حمد دیکھا۔	۵
بمنزلہ سیکھ رکوف	تھانے سے روائی کی تاریخ وقت ۱	۶

Attached to be  
from myself  
W) green

۱۰۷

اطلاع کے پیش اطلاع دہندہ کا مشکلہ ہے۔ یاں کی میری ایشور، اکیا جائیں۔ اگر انھریں لکھدے، ابتدائی اطلاع کا وسیطہ بطور تصدیق ہے، تو کوئی بدل الفایب سرخ رہنائی سے بالتعاش نام پر ایک طزم باشترین انتہی ہے، واسیے باشد کیاں طلاق خیر یاد سڑیاں افاقت ان جہاں موزوں ہوں۔ لکھنا چاہئے۔

16

۱۰۰۰ میلادی

شیخ زید

مقدمه ۷۶ درخواست ۱۴/۰۹/۲۰۱۳ تا ۱۵/۰۹/۲۰۱۳

پناہ یا کم خاکو لد عز خطا توک صورت کندہ جو ڈریں ڈینا  
سماں اُنہاں

الكتاب

لکھر ۱۵ عتو دیا جائیں دین اکل روانا بائیں بیدار کیم ریاں دین اکل دل دل  
جیلے بائیں میشل لیشن چھ صاد سیرنیا تکاری شوون جان  
کدر کر میشل دیور رجس کو سفرہ ملنا اوس کدر فشار تھیر کر کے  
کا وہ کدر ضاری افتدھا کیز رکھا ہے۔

A'sHC-PS.Cai  
JF-07-22

حَكْمَةُ الْمُلْكِ وَالْمُنْزَهُ

مکھر لامبے طواف کرنے والے

مشیطہ بہر، جوہا قدر حلاں دعا

رکھ دیتے تھے 59/60 ناقہ

## مکالمہ فتح علیہ

1990-8633103-5  
0348-3357038

صَلَّى اللَّهُ عَلَيْهِ وَسَلَّمَ كَذَرِي اللَّهُ حَضْبُو طَبَرِي

کوہاٹ، ۳۵/۳۶ سال، نوادرہ

درازمنی سیدا در پر ملکه ایان بیان

12251-9679689-1  
AB66-784074

Attested to be true  
copy

الشیعیان

شیعیان



- 12 -

OFFICE OF THE  
SUPERINTENDENT OF POLICE  
INVESTIGATION DISTRICT TANK  
PH. NO. 0503-511780  
MO. NO. 0503-511257.  
Email address. [spinvtank@yahoo.com](mailto:spinvtank@yahoo.com)

No 655 / Inv: Dated Tank the 16/04/2022

To: The Superintendent of Police,  
Elite Dera Kamal Khan.

Subject: INTIMATION REPORT  
CASE FIR NO.76 DATED. 01.04.2022 UNDER SECTION 302-PPC  
POLICE STATION GUL IMAM TANK..

It is intimated that in the subject cited case, Ameen Jan son of Wali Muhammad caste Marwati R/o Wando Zalo, charged accused Shafi Ullah son of Izat Khan caste Marwat R/o of Wanda Dost Muhammad is Govt employee and was performing his duties as Constable in Elite Force under your kind command and was posted at Police Station Gul Imam. After commission of offence the above mentioned accused fled away from the spot. (Copy of FIR is enclosed).

The instant case has been registered and pending investigation. During course of investigation, it has come to notice that the charged accused Shafi Ullah son of Izat Khan caste Marwat R/o of Wanda Dost Muhammad is Govt employee and was performing his duties as Constable in Elite Force under your kind command and was posted at Police Station Gul Imam. After commission of offence the above mentioned accused fled away from the spot.

In view of above, it is requested that Departmental proceedings may kindly be initiated against Constable Shafi Ullah under intimation to this office, please.

Superintendent of Police,  
Investigation Tank

NO 655 / Copy of above is sent to Incharge Investigation staff PS Gul Imam Tank w/r to his application 04.04.2022, for further necessary action.

Superintendent of Police,  
Investigation Tank

intended to be true copy  
Wali Khan

CH 3 11

# Forensic Science Laboratory

Police Investigation, Khyber Pakhtunkhwa  
29-B1, Phase-V, Hayatabad, Peshawar.  
REPORT OF THE FIRE ARMS EXPERTS

Laboratory No.FA-25-3456-57-2022 received the sealed parcel on 06-04-2022.  
At FSL from SHO PS Gul Imam District Tank.

The seals on parcels were found intact.

FIR No.76 dated 01-04-2022 U/s 302-324-34 PS Gul Imam District Tank.

1. P.No.2 having three seals of AI containing

Five crime empties now marked C1 to C5.

2. P.No.3 having three seals of AI containing

Five crime empties now marked C6 to C10.

Note:- The crime empties were signed by the experts.

OPINION:- Microscopic examination of the case has revealed as under:-

1. The five crime empties marked C1 to C5 are that of 7.62mm bore(G1) and were fired from one and the same 7.62mm bore(G3) weapon, in view of the following major points i.e striker pin marks, breech face marks and ejector marks etc. are similar.
2. The five' crime empties marked C6 to C10 are that of 7.62mm bore and were fired from one and the same 7.62mm bore weapon, in view of the following major points i.e striker pin marks, breech face marks and ejector marks etc. are similiar.

Note:- (1)

(2) Any report without embossing marks is not genuine.

(3) The contents of the parcel were under our immediate custody until the examination was completed.



FIRE ARMS EXPERT

FIRE ARMS EXPERT

No.....11124...../FSL, Dated.....09-05-2022

The opinion of the Fire Arms Expert is forwarded to SP/Inv: Tank.

The receipt may be acknowledged and the exhibits collected from this laboratory.IK.

Mr. Inv Gul Imam  
for initiation

Subdt. of Police  
Investigation, Tank

Attested to be true

copy

Wazir

DIRECTOR  
Forensic Science Laboratory  
Police Investigation, Khyber Pakhtunkhwa,  
Peshawar.  
Ph: 091-9217394 Fax:091-9217251

- 14 -

IN THE COURT OF  
MALIK MUHAMMAD HASNAIN,  
ADDITIONAL SESSIONS JUDGE-I, TANK  
BBA # 375/4 of 2022

Hashim Khan etc Vs The State

FIR # 76 Dated 01.11.2022

Under Section: 302/324/34 PPC

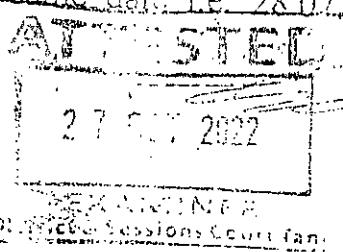
Police Station: Gul Imam, Tank

Or.....04  
07.09.2022

Present: The accused/petitioners namely Hashim Khan & Shafi Ullah on ad interim bail alongwith Mr. Kalim Ullah Kundi Advocate; complainant in person; Mr. Ikram Ullah APP for the state; SHO PS, Gul Imam, in pursuance to court order, submitted list of LRs of the deceased, placed on file.

Learned counsel for the accused/petitioners submitted original registered deed, through which; property has been transferred in favor of the minor LRs of the deceased namely Muhammad Asad, Muhammad Saad & Sonaina Bibi (original seen and returned, copy placed on file).

Accused/petitioners seek confirmation of their pre arrest bail already granted to them on 21.07.2022 by this court. On 28.07.2022, complainant/father Ameen Jan, Mst Saira Bibi (mother of the deceased) & Rozina Bibi (Widow of the deceased) came up with an affidavit of compromise, whereby; they have affected a compromise with the petitioners and pardoned them, in the name of Almighty, by waiving their right of Qisas and Diyat. Their joint statement towards confirmation of compromise has been recorded overleaf the deed, wherein; they endorsed their no objection on acceptance of the present BBA petition or later on acquittal of the accused during the trial. On the same date i.e. 28.07.2022, one namely Atta Ullah

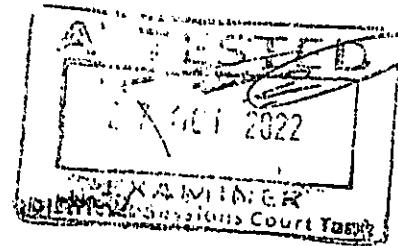


Attestation to be  
true copy  
Hgaww

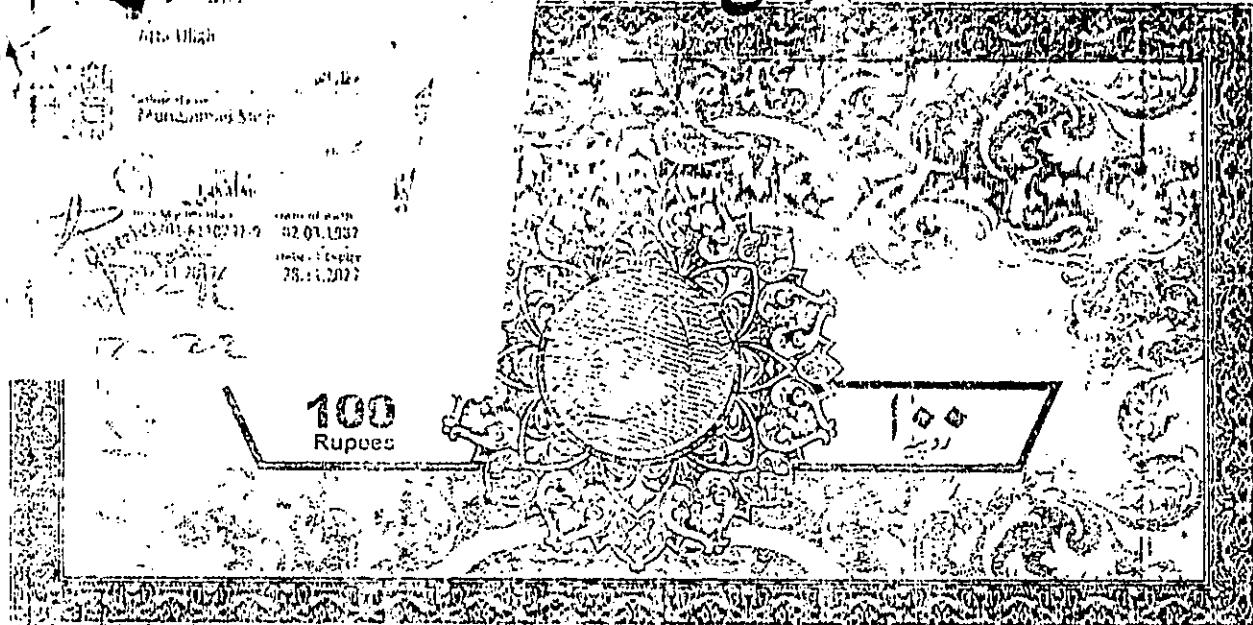
(injured in the instant case) also tendered an affidavit of compromise, whereby, he has also affected compromise with the accused/petitioners and endorsed his no objection on confirmation of the present BIBA petition or later on acquittal of the accused during trial; property has been transferred in the name of minor LRs of the deceased mentioned above in lieu of Diyat. Offence U/S 302/324 PPC are compoundable as per schedule II appended to the Cr.P.C, therefore, without advertizing to merit of the case, the compromise being genuine and forthright is accepted. Resultantly, Pre-Arrest Bail already granted to the petitioners is confirmed on existing bail bonds. Copy of this order shall invariably be made part of judicial record, whereafter, the same be returned to quarter concerned. File of this court be consigned to record room after putting it in order.

Announced  
07.09.2022

X/21/2022  
Malik Muhammad Hasnain  
Addl: Sessions Judge-I, Tank



Attested to be true  
copy  
Hassan



الله خير من يرجعه إلى حالي

K. S. A. C.

3.  $\{ \dots \}$

La Commission  
électante

1-11-22 2000

-  $\text{f}^{4.65^{\circ}}$  in  $\hat{\omega}$   $\frac{302-324}{34 \text{ PTE}}$  signs?

خاشقی را پس از آن که باید  
آن را در خانه بگذارند و میتوانند  
آن را در خانه بگذارند و میتوانند  
آن را در خانه بگذارند و میتوانند  
آن را در خانه بگذارند و میتوانند

ATTESTED  
12:00 PM 2022  
EX-REG-EE

لهم إنا نسألك ملائكة خيرٍ وننفخ فيهم حبَّ الصلوة والبر

Affected to derive off  
allusion

28/07/1997

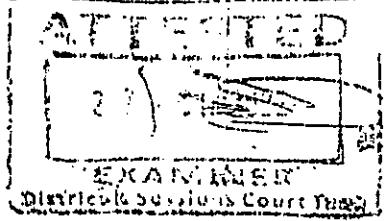
in his interview with the N.I.C. he  
stated that he had been given a false  
name by his captors and that he was  
not a member of any organization.  
He also stated that he had been  
tortured and beaten by his captors  
and that he had been held captive  
for about 10 days. He further stated  
that he had been held captive at  
the B.B.H. Camp in Jalandhar and  
that he had been tortured by the  
Ex-PAIGC members who were  
holding him captive. He also stated  
that he had been held captive at  
the B.B.H. Camp in Jalandhar.

- E End - 6

~~W.M. - 22~~

28-2 22

W.M. - 22  
D.R.N.W.S.C.  
12206 6/107/97-9

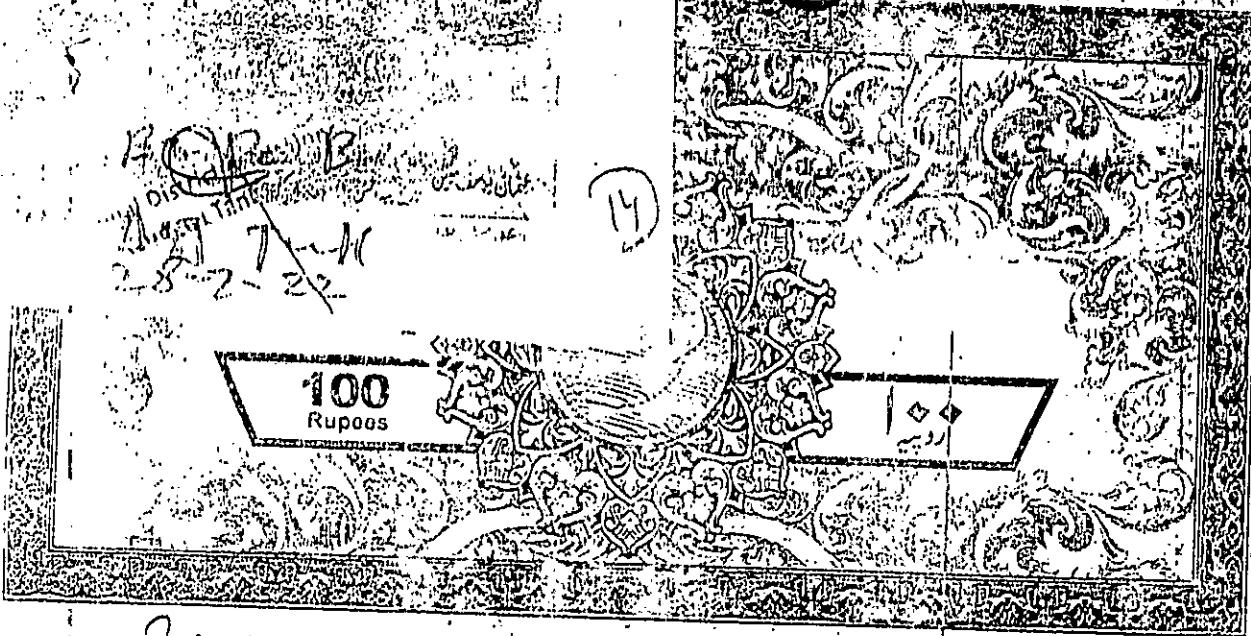


Attested to be true

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شکر الدین

9/11



لهم انصبنا بآمنة وسلامة من كل شر

عاصم خان وعمره 76

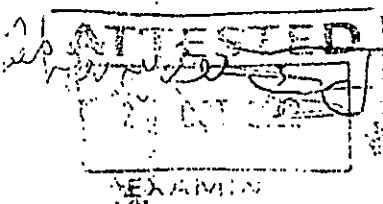
B21 P 21

302-324  
34 ppn  
1-11-22 - قرآن  
معجم 76

28-2-22

سازمان

مسئلہ میں جن مردوں کے ساتھ ہی بیوی اور اپنے بیویوں کے  
کے عینہ پر رُوفہ میں کے سین جان نعمان نہیں سائیں ورانہ لام زیاد  
کشرا و خسروں پر۔ بڑھنے سے تربیت کے ساتھ مارکان مقتول  
جانشی میں مکونہ عرضہ علیہ میں عاصم خان، سفیر اس سرکار  
بریٹنی فرانسیس اور امریکہ نے اپنے اعلیٰ عہدے کے  
حکمے کے میں تقدیم کر دیے (رض) باغ میری معوال  
پسندیدہ اکٹھا کرنا اور اگر میری اپنے بیویوں  
معزز ہوں اپنے خانہ میں رہنے (لئے) آئیں اور  
ماں کے صاحب میں نوکری کے لئے کام کریں اور  
کوئی نیسی کوچ کر کر اپنے کام کرنے لے رہے ہیں۔



دہشت ہے

17-11-1950

Attempt to be forged

شہر

$\mathcal{E} \text{ Ein } P: K \cup EP: B$

امین کان. تصحیح خود

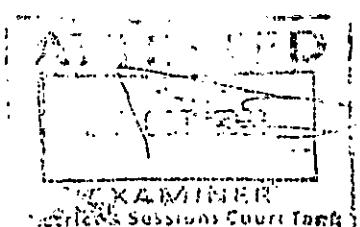
44 ०८७३८८१०/५५४१०  
1220-18838807(६)

John Newell

122012692010-6

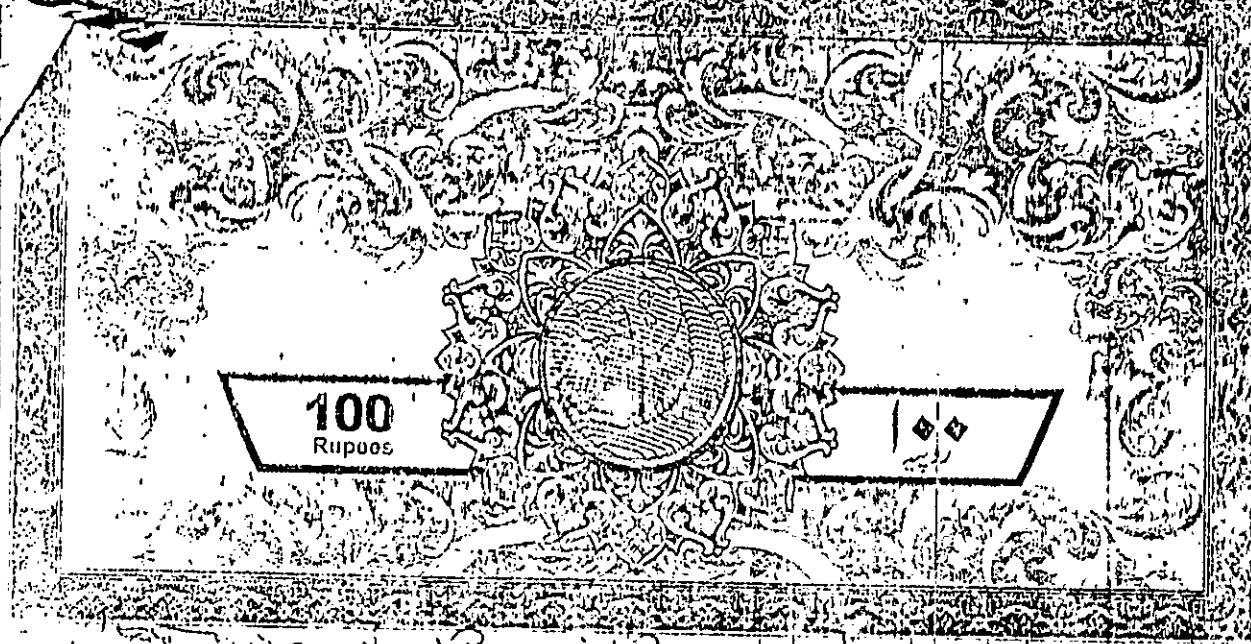
*Sainte-Croix*

12201-44666 (45-10e)



Attested to be true copy

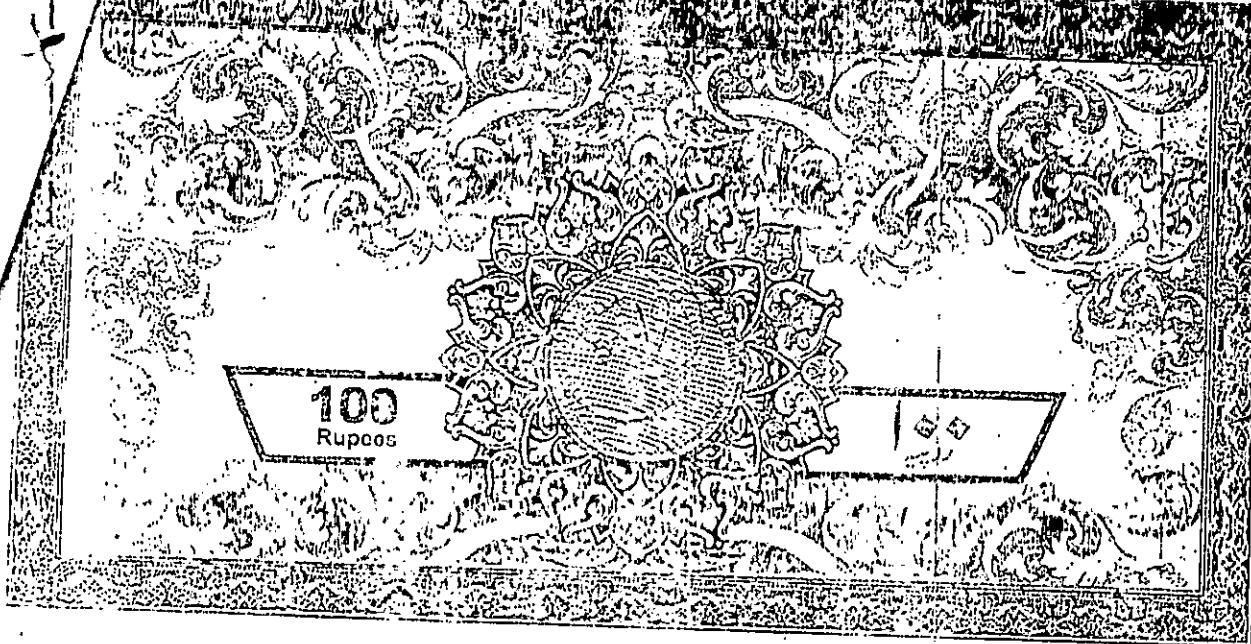
بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِيْمِ



کریم خان نے اپنے اس بھروسے کو اپنے ساتھ لے لیا۔

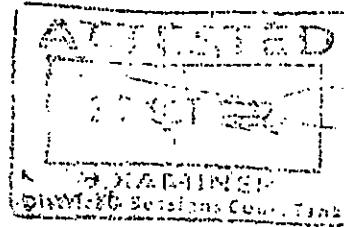
1	سرحدیں گی	
2	دہم شوال آٹھویں بیانی میں درود اسلامی	
3	دو پانچ سو دو پانچ بیانی میں درود اسلامی	
4	ذی القعده ۲۲ صفر ۱۹۷۲ء میں درود اسلامی	
5	پانچ سو سی و سی بیانی میں درود اسلامی	
5/A	پانچ کی تیس بیانی میں درود اسلامی	
6	کام دراللہ کو شرمندی میں درود اسلامی	
6/B	کام پانچ کی تیس بیانی میں درود اسلامی	
7	باقی بیانی میں درود اسلامی	
7/A	ذی القعده ۲۲ صفر ۱۹۷۲ء میں درود اسلامی	
7/B	لارش رہمان کی درود میں تسلیم	
7/C	لارش رہمان کی درود میں عذالت و حمد و شکر	

کے بعد  
کے بعد  
کے بعد



 National Curriculum & Textbook Board Islamabad	<b>Grade 5</b> <b>Urdu</b> <b>Book No. 1</b>	<b>Page No. 10</b>
<p>کے خوبی کے نفع کے لیے امانت و بہترانی</p>	<p>دینے والے اپنے پڑاواں کی ادائیگی</p>	<p>ام این اے الیکٹریٹ ایم ایسٹریٹ بھر بکھر کھل سے دارالعلوم کی تقدیر یونیورسٹی ریاست</p>
<p>سونے حلقی لفجع</p>	<p>خوبی اس درج کے درد سے بلائش کی روشنی یا بیجان کے بارہ میں بیان مانی</p>	<p>11</p>
<p>بھر بکھر کھل سے دارالعلوم کی تقدیر یونیورسٹی ریاست</p>	<p>بھر بکھر کھل سے دارالعلوم کی تقدیر یونیورسٹی ریاست</p>	<p>12</p>
<p>بھر بکھر کھل سے دارالعلوم کی تقدیر یونیورسٹی ریاست</p>	<p>بھر بکھر کھل سے دارالعلوم کی تقدیر یونیورسٹی ریاست</p>	<p>13</p>

*Helen*



effected by bacterial  
algae copy

right side of the hill.

Feb-22 ins 76 inscrips  
Fig. n. 302/324/34 inscrips.

W. N. J. - 1870-1871  
Slight, light greenish-yellow, attested to  
be true  
cups.  
The grain  
is yellowish-green,  
the seed  
TESTED  
270-200  
EXAMINED  
240-200  
C. J. W. G.

P.T.O.

17

二十一

الحادي

Three & four days before John's  
- Evidences of his/her  
- ESPR etc

metaphysical beliefs, etc., etc.  
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R-Ts

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the true  
Moses

Habakuk

الله رب العالمين  
بسم الله الرحمن الرحيم

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222 223

ATTESTED
27 OCT 1955
KK NAWAZI, Deputy Sessions Court Clerk

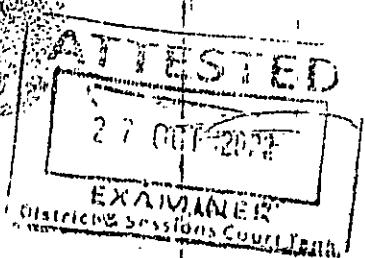
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Signature

Attest to be  
true copy  
of document

R. on 4E  
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四百一

Kris  
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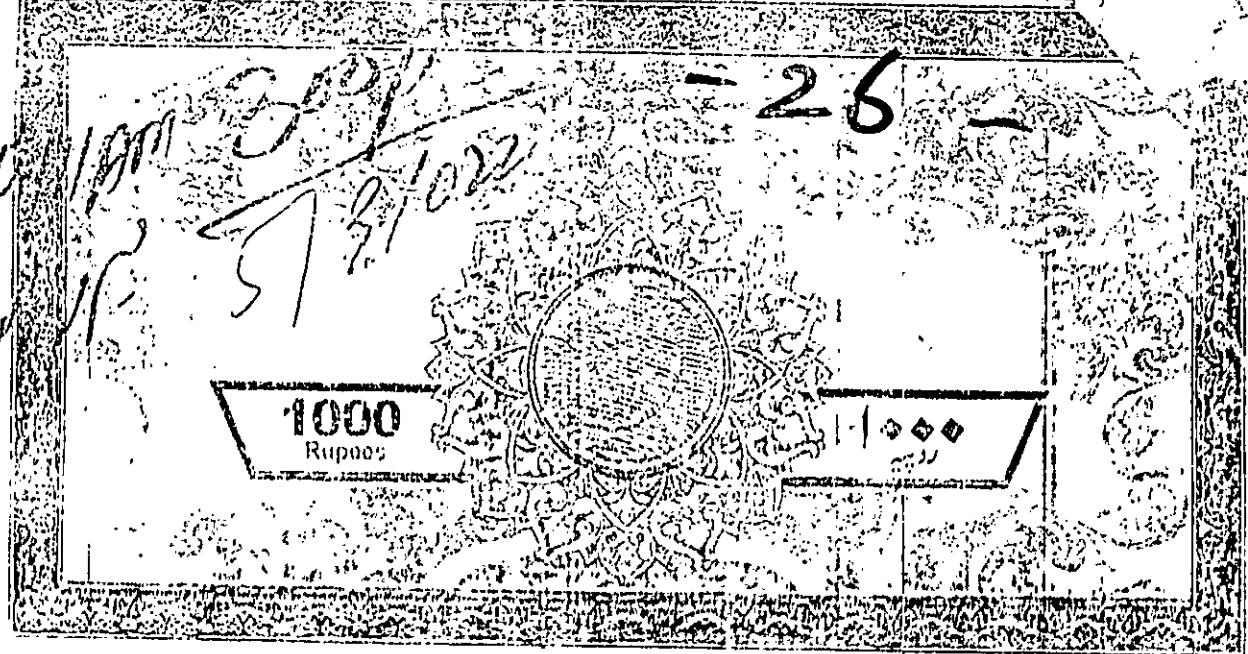


Attestd to be  
true copy  
H. G. W.

*W*  
Katholisch-Deutsch. Comptoir  
District Bar-le-Duc

### *... movement towards*

- 26



بِتَحْمِيلِهِ وَبِسُرْعَتِهِ أَلْيَانِهِ مُتَّبِعٌ بِهِ وَمُنْتَجِعٌ مُلْفِزٌ بِرِيشِهِ فَلَيْلَ ذَارٍ كَلَانِيَّةٌ إِذَا سَرَّهُ الْأَلْيَانُ

سندھی سٹی ایمین جان دلر و فوجہ قوم کنڑی سکھ ناں لدھ زار، تھیں رجھے داںک  
اس قدریکی رو سدھ بر صامنہ گھوڑ کھی دیتا ہوں کہ من مقرر ہاں خالص کھانا نہ فر 285/287  
کھتوں فر 285/287 61 کا تاکہ 61 خود بڑا 11، 511، 355، 383، 339، 168، 690، 514، 327، 626  
کل رقبہ 127-7 میں سے حصہ نہ تھا 6-3-272-6، واتھ خوض طاندھ زار کا ہے پھر سال  
2024-22 زیرک، کامل ہاں خالص ہوں۔ اور اپنی سندھ کو یاد رکھ کے نہ کروں، بلکہ  
حداں ہے۔ قبائل ایں نہ تو فوجہ خدا شدھے مادر بندھوں، بیچ خیروں، شام دیکھوں نہ تھاں  
کھرسیں کھری خالصی اسرائیلیوں سے۔ لیکن اسی نہ کمی ہوش خواہ، بلکہ کوئی نہ فر جس  
کے بغرضی خود ارضی سندھ کو عالم دریت خون بیا ہے تو، خانہ جمل کے بھرپور میں، اُسی کی طرح  
ڈاشان، قہر سعد، تہارہ اپریوں، سوئیں دھنتری ٹھیں جان قوم کنڑی سکھ ناں لدھ زار کا  
کو اپنی قوم کر دیے۔ دھنتر کی طرف ارضی سندھ کو عالم دریہ کی طرف۔ اور سندھ کو اپنی ناہمیان  
و ناجھہ ایکی اس زیرخوبی سوچ۔ ہر جل کو کوڑ دیا۔ اُجھ رفے سے من مقرر پڑے دیکھ دیا۔  
کوئی قبیہ سندھ کو کس تو کسی کو کوئی نہ لے، ملے ہوں اپنے بھرپور میں۔ بکھاریوں میں سے بھرپور  
خالصان میتھیں ملک مالک کو رفیب سندھ کو عیسیٰ خالص، دھنیں کریم، ماں کے بھل بھرپور ہے۔

مکالمہ

الله يحيى

Attatck

to  
city  
Hall

۱۷۰

باقی اسٹاپ بائیت مبلغ 1500/- ریسے بابت رجسٹری دینت نہ  
کرے گا جو فتح علیہ 5 بروز سماں پر 20-11-1947 پر فتح علیہ 5R  
کے نام و نمبر پر بڑی پیشہ کا شفاع نہ دینے گا۔

رجسٹری دینت کی۔

*Signature of  
Muhammad Ali Khan  
16th May 1947  
18901 86331025*

حسن امیر بیان ولد ولی محمد نور احمد سندھی احمد داد نصیل نواب  
بخارج نے کشت احت و نگاری و سیم جان ولد اصلی جان، شریف جان  
اصل جان دیوان خان خاشیہ نے نہ فتح علیہ 5R صدر آئر محصول  
دینے گیا تو اس کو سمجھ کر اسکی وجہ تحریر پر وکیل دوست  
لشکر انصاریکی۔ (بیان بعد اطمینان و لطف گویاں) 2 دختری  
بخارج 3 زوجی۔

*18901 8380529, 18901 18232951, 18901 52526543*

اصحیان

عکس جان

شریف جان

Attached to true copy  
Magistrate

appeared before the court his statement towards

شیخ الاسلام

۲۸

500  
Rupias

امروز ارضی کاروہ کیلہ نہالن، تریخی، راجی، راشنی، اشناڑی  
کے مکان نہیں ہے۔ اس کا کامنہ مکانہ ہے۔ بالآخر، اقتصادی میراث  
ختم 302326 A.D. خانہ گھر ہے۔ خوش فرز براستھریل شفیع جان کے ناوالان  
کوئی مکان نہیں کوئی ہے۔ ارضی کامنہ کی مکانیں سوتھیں ہیں۔  
بیت خانہ 19500 روپے اور گل 99500 روپے۔ خرید سطح 2342500  
بیت۔ جس میں نایابخ غریب کا رجع 959400 روپے کو اس کا رجع  
میں 959400 روپے بجیہ دفتر سوندھ کا رجع 4797001 روپے ہے۔  
مکون بالا کو برائے رہنمائی پختہ کرتے۔ اس نامہ میں ایک روپے 2 ہے۔  
جائز ہے۔ معمولی بالا کو اپنے طور سے اور جس کو دیکھتے تھے کام کرنے کے لئے  
کوئی ان پسندیدنی اشیاء اور مواد نہیں کر دیتے۔  
رسٹور چارڈب نامکار نہ رکھتے۔ کروز گا۔ سوندھ

موش 3- 405555-5-12201-1883895-1-12201-8378047-9  
اویں جان سر برکر شریف جان نذری  
ڈیسی ہان جان نذری جان نذری  
سکھ دانشہ زلوڈار خان دین بیوی

سرفی جان

Attestd to be true  
شمعیل

(اپریشن ایجنٹ مذکور)

الله

- 29 -

03-08-022

پنج 185 مل، 7 مل، 300 مل  
کھنڈیاں 2 مل، 1 مل، 1 مل  
کھنڈیاں 2 مل، 1 مل، 1 مل

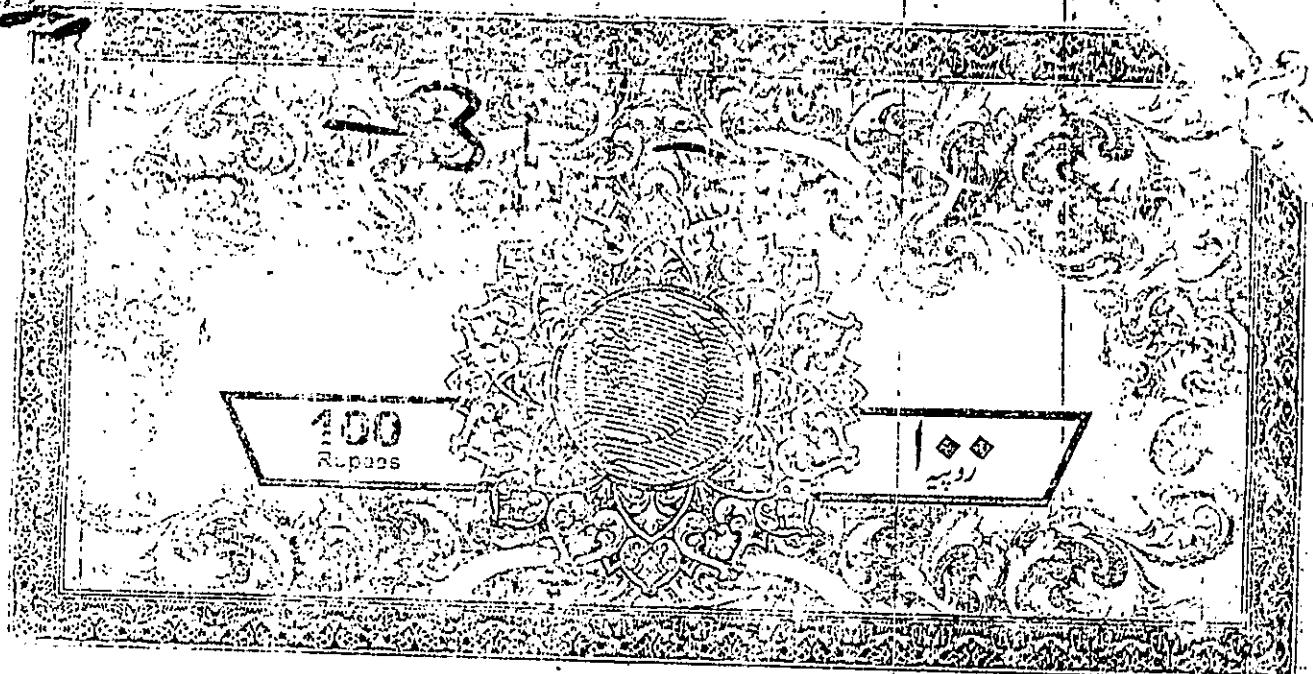
مکان

362

Attest to be true  
copy  
M. Grewal.

1013  
appeared before the court his statement towards





P. P. Johnson, M.D., F.A.C.P.

0348 B3.57038

0342  
033783

جعفر بن معاذ

میہمان نامہ ۹۳۳  
پاکستان  
۱۴۸۳۶۹۵-۱۲۰۶

19 GOCS 26543 J. G. L. 1905

R. Grifffith

Jelly Joe affixed to  
from copy of  
Willow

١٣

IN THE COURT OF  
MAULIK MUSLIM MUHAMMAD HASNAIN  
ADDITIONAL SESSIONS JUDGE-I, TANK  
Criminal Case # 136/2 of 2022

Ansir  
v  
71

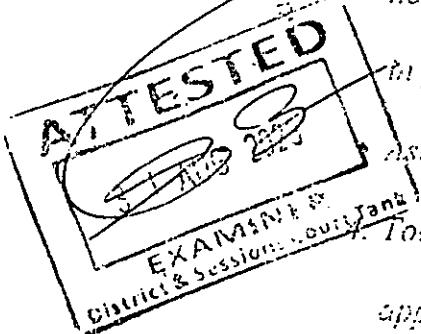
The State Vs Hashim et al.

Case FIR #76 dated 01.04.2022 U/S 302/324/34 PPC PS, Gul  
Inam District Tank.

Or.....02  
27.10.2022

حکومت پنجاب / بارہویں سالہ اسلامیہ کے لئے جنگی قانون

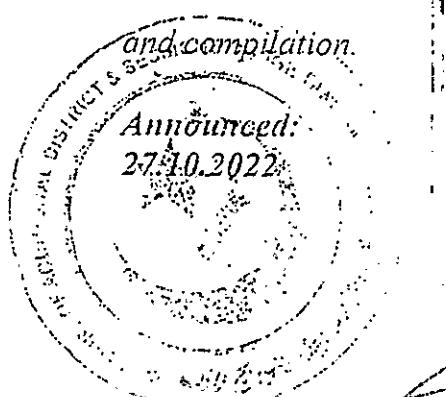
1. Present: The accused Hashim Khan and Shafi Ullah on bail alongwith Mr. Kalim Ullah Kundi advocate while filing PW: complainant Ameen Jan; Mr. Ikram Ullah APP for the state.
2. Accused have been charged by the complainant for murder of his deceased son Sameen Jan and attempting at his and his relative namely Atta Ullah's life.
3. The perusal of the record would reveal that, deceased Sameen Jan has been survived by his parents, widow and three minors. List of LRs of the deceased is available on file. During the pre arrest bail proceedings of accused, father/complainant, mother, widow of the deceased as well as PW Atta Ullah got recorded their statements, stating therein that, they have affected a compromise with the accused and pardoned them, for the sake of Almighty, by waiving their right of Qisas and Diyat. Pertinent to mention here that per record property has already been transferred in favor of minor LRs of the deceased namely Muhammad Asad, Muhammad Saad and Sonaina Bibi.



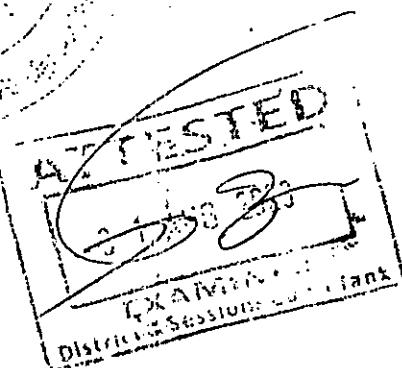
Today Ameen Jan (complainant/father of the deceased) appeared before the court; his statement towards

confirmation of compromise got recorded after obtaining his CNIC copy as EXP A; he authenticated the subsistence of compromise with the accused facing trial at pre arrest bail stage. He verified that factum of compromise already affected at pre arrest bail stage. Since, the LRs of the deceased as well as PW Atta Ullah have affected a compromise, pardoned the accused and no more interested to prosecute them, there seems no prospect of accused being convicted, even if, the matter is proceeded ahead.

5. In view of the foregoing discourse, accused Hashim Khan & Shafī Ullah S/Os Izzat Khan caste Marwat R/Os Wanda Dost Muhammad District Tan are acquitted in present case FIR #76 dated 01.04.2022 U/S 302/324/34 PPC PS, Gul Imam. Since, they are on bail, their bail bonds stands cancelled and sureties are absolved. Case property be disposed off after the period of appeal/revision. File be consigned to record room after its necessary completion



Malik Muhammad Hasnain  
Addl: Sessions Judge-I, Tank



Hgriw

الله يصمد في السموات السبع

لهم نعوذ بِكَ مِنْ كُلِّ شَرٍ

1-11-22 geel 76 sugar

1.  $\int_0^t \int_0^s \int_0^r \beta_{21} \beta_{24} \beta_{41} \sin \omega_j ds dr dt$

رکھنے والے اور اس کی تحریر کرنے والے میں سے ایک

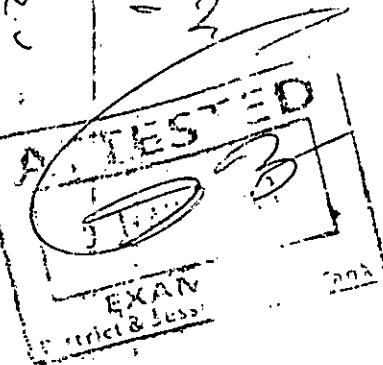
جیسا کوئی نہیں ملے تو اس کو اپنے بھائی کا سمجھو  
جیسا کوئی نہیں ملے تو اس کو اپنے بھائی کا سمجھو

جای عجیب مقرر ریخت -

i. C B-B-A ملحوظات (ف) ملحوظات  
ii. C وجدت نتائج مماثلة

B.B. Final 100% in 8 weeks stage

- دینیات میراں کے نام سے  
ن ت



جیلگیری کے لئے اپنے بھائی کو  
کامیاب کر دیا۔

Sil-Twinkling in the valley  
C. 265K in the hills  
Cape Town / Cape Town  
C. 265K in the hills

7.10 " 2022 See \_\_\_\_\_

جعفر بن محبث

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِيْمِ

*W. J. C.*

لهم إني صاحب حلمٍ لست بحالمٍ

مکالمہ میں اپنے  
لئے اپنے

11-22 see 76 Justice

ir (e) 302/324/34 DPE irijf3

See Ju

*E. F. A.*

Johnnie Stipe ~~is~~ <sup>is</sup> one of the  
children of Mr. & Mrs. John Stipe.

وَالْمُقْتَفِي بِمَحْلِهِ مَرْجِعِهِ

لورسہ دارِ مطہار اللہ کے راہ پر یہ نہیں تھی خالد بن فہرناز — میرزا کی رکوں  
کے ساتھ میں اپنے امتحان سے صافی تھیں جو کسی کو اپنے امتحان سے  
کھوئی تھیں (ابدی امتحان سے) اسے صافی تھیں جو کسی کو اپنے امتحان سے

بِخَلْفِهِ بِالْمُسْكَنِ مُحَمَّدٌ طَهُونَ وَمُحَمَّدٌ طَهُونَ

لهم انا نسألك مغفرة ذنب ما ارتكبناه

لِرَبِّ الْعَالَمِينَ لِرَبِّ الْعَالَمِينَ لِرَبِّ الْعَالَمِينَ

لعل من أحسن ما يقال في ذلك هو ما قاله العلامة ابن الصفوي في رسالته المختصرة في عقيدة أهل السنة والجماعة:

لهم انت معلم من لا يعلم سار على نهج الراشدين

الله يحيي الْمَوْتَىٰ

مسند والدعيه ۲۲ صن حن ولدی فوج کل سنه وانمہ زلزله ۵۶  
۱۷۷۰ - ۱۸۸۳ ۸۹۵ - ۱



Office of the Deputy Commandant  
Elite Force Khyber Pakhtunkhwa Peshawar

678-105/EP

Date: 30/06/2022

ORDER

This order will dispose off the departmental proceedings against Constable Shahiullah No. 4129, of District Police Tank now on deputation to Elite Force Khyber Pakhtunkhwa.

He has been charged in case FIR No. 76, dated 01.04.2022 U/S 302/324/34 PPC Police Station Gul Imaam District Tank and also remained absent from lawful duty without any leave or prior permission from the Competent authority w.e.f. from 31.03.2022 till to date.

In this regard he was suspended and Charge Sheet alongwith Summary of Allegation were issued to him by this office vide No. 3573-78/EP, dated 05.04.2022 and Mr. Tauseef Khan the then Acting DSP Elite Force D.I.Khan Region was appointed as enquiry officer. The Enquiry Officer conducted the enquiry proceedings and reported that according to the statement of Investigation Officer ASI Muhammad Ishaq a raid was carried out for his arrest but the said constable is still hiding after the incident. After completion of legal process on 30.04.2022, Chalan has been completed U/S 512 CRPC and sent from PS Gul Imaam to DPP office through receipt vide No. 51/21, dated 16.04.2022. Furthermore, his history sheet in PS Gul Imaam has also been prepared under Police Rule Chapter No.23, Line No.09 vide No. APO528. The Enquiry Officer further added that keeping in view the statements, record and information on file, the said constable is still absconding and there is no hope to report for his duty. Similarly a Final Show Cause Notice was issued to him vide No. 5607/EP, dated 07.06.2022 which was delivered to him at his home address through Reader A/DSP D.I.Khan and received by his cousin namely Zahir ud Din s/o Sultan Khan (CNIC No. 12201-9479682) on 12.06.2022, but he failed to reply, nor appeared for duty. It seems that he has no interest in his current job.

Therefore, I, Asif Iqbal Mohmand, Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, keeping in view the above facts take ex parte action, impose major penalty of "DISMISSAL" from service upon him from the date of absence i.e 31.03.2022 under Police Rules 1975 (amended 2014).

(Order announced!)

  
(ASIF IQBAL MOHMAND)/PS  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa  
Peshawar.

*Attested to be true  
copy  
M. Asif*

Copy of the above is forwarded to the:-

1. District Police Officer D.I.Khan for information.
2. Acting Superintendent of Police, Elite Force HQrs Peshawar.
3. Acting Deputy Superintendent of Police, Elite Force D.I.Khan w.r.t his office Memo No. 326/EP, dated 13.05.2022.
4. Accountant/A/C Ker, Elite Force Khyber Pakhtunkhwa Peshawar.
5. OASI/SAC/HC, Elite Force Khyber Pakhtunkhwa Peshawar
6. FMC, Elite Force alongwith complete departmental enquiry files Encl: (3) pages. (Dairy vide No. 3763 /EP dt 17.05.2022).

Better Copy

ELITE FORCE KHYEBR PAKHTUNKHWA

No. 6578-

Date 30/06/2022

ORDER

This order will dispose off the departmental proceedings against Constable Shafiullah No. 1429 of District Police Tank now on department of Elite Force Khyber Pakhtunkhwa.

He has been charged in case FIR No. 76 dated 01/04/2022 u/s 302,324,34 PPC Police Station Gul Imam Tank and remained absent from lawful duty without any leave or prior permission from the Competent authority w.e.f. 31/03/2022 till to date.

In this regard he was suspended and charge sheet alongwith Summary of allegations were issued to him by the office vide No. 3573-78-EF dated 05/04/2022 and Mr. Masood Khan the then Acting DSP Elite Force D.I.Khan Region was appointed as enquiry officer. The inquiry officer conducted the enquiry proceedings and reported that according to the statement of investigation Officer aSJ Muhammad Ishaq a raid was carried out for his arrest but the said constable is still hiding after the incident. After completion of legal process on 13/04/2022, Chalan has been completed u/s 512 CrPC and sent from P.S Gul Imam in DPP office through mail vide No. 6121 dated 10/04/2022. Furthermore, his history sheet in PS Gul Imam has also been prepared under Police Rules Chapter No. 23. Line No. 09 vide No. APO528. The enquiry Officer further added that keeping in view the statements, record and information on file, the said constable is still absconding and there is no hope to report for his duty. Similarly a final Show Cause Notice was issued to him vide No. 5607-EF. Dated 07/06/2022 which was delivered to him at his home address through Reader A/DSP D.I.Khan and received his cousin namely Zahir ud Din son of Sultan Khan (CNIC No. 12201-9479682) on 12/06/2022 but he failed to reply, nor appeared for duty. It seems that he has no interest in his current job.

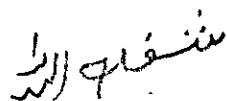
Therefore, I, Asif Iqbal Mohamand Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, keeping in view the above facts take ex-parte major penalty of "DISMISSAL" from service upon him from the date of absence i.e. 31/03/2022 under Police Rules 1975 (amended 2014).

(order announced)

Asif Iqbal Mohamand) PSP  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa  
Peshawar

Copy of the above is forwarded in the

1. District Police Officer D.I.Khan for information.
2. Acting Superintendent of Police Elite Force HQs Peshawar.
3. Acting Deputy Superintendent of Police Elite Force Dera Ismail Khan.
4. Accountant Elite Force, Khyber Pakhtunkhwa Peshawar.
5. FMC



بیانیہ مدت جناب پری کمال نٹ ایلیٹ فورس خبرپختو خواہ اپشاور

درخواست برائے فراہمی نقولات نسبت Dismissal order برائے لیٹر نمبر 6578-85 مورخہ

30/03/2022 بابت شفیع اللہ سابقہ کاشیبل ایلیٹ فورس ٹانک بیلٹ نمبر 1429 پلاٹون 101

وزیر خبرپختو خواہ 2013

جناب عالی! سائل حسب ذیل عرض رسان ہے۔

۱۔ یہ کہ حکمہ پولیس (ایلیٹ فورس) ڈیرہ اسماعیل خان میں بطور کاشیبل مورخہ 01/01/2011 بھرتی ہوا تھا اور اس وقت سے پوری ایمانداری، جانشناختی کیسا تھا اپنی ڈیوٹی سرانجام دیتا رہا۔

۲۔ یہ کہ مورخہ 30/06/2023 کو برائے لیٹر نمبر 6578-85 بغیر کسی وجہ کے ملازمت سے برخاست کیا گیا ہے جس کی نقول سائل کو فراہم نہیں کی گئی۔ اور اب سائل مذکورہ Dismissal order کے خلاف مجاز فورم میں اپیل دائر کرنا چاہتا ہے جس کی نقول مشمولہ Dismissal order مذکورہ بالا، چارج شیٹ، Statement of allegations معہ آرڈر (اگر کوئی ہو) تو سائل کو فراہم کرنا یعنی قرین انصاف ہے کیونکہ سروس ٹریبوئل کا عملہ دائری بغیر نقول کے اپیل لینے سے انکاری ہوتے ہیں۔

لہذا استدعا ہے کہ درخواست بذا منظور فرماتے ہوئے سائل کو مذکورہ بالا دستاویزت کی نقول فراہم کی جائیں۔

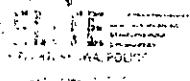
مورخہ 01/09/2023

سائل شفیع اللہ سابقہ کاشیبل ایلیٹ فورس ٹانک بیلٹ نمبر 1429 پلاٹون 101

موباکل نمبر 0344-7540740

شکریہ اللہ

شکریہ اللہ



- 4 -  
*Aman*

Office of the Addl; IGP,  
Elite Force Khyber Pakhtunkhwa Peshawar

Date: 08/07/2022

ORDER

This is departmental appeal submitted by Ex-Constable Shafi Ullah No.1429 against the punishment of dismissal from service awarded to him by Deputy Commandant Elite Force vide order No. 6578-85/EF, dated 30.06.2022 as he was charged in case FIR No. 76, dated 01.04.2022 L.S. 30/24/34, PPC PS Gil Jumam, District Tank and also remained absent from lawful duty without any leave or prior permission from the competent authority w.e.from 31.03.2022 from the date of issuance.

Hence, the competent authority on the perusal filed his appeal on the grounds of time limitation i.e. time barred.

Order Announced:

-Sd-

(MUHAMMAD WISAL FAKHAR SULTAN) PSP

Addl: Inspector General of Police,  
Elite Force Khyber Pakhtunkhwa Peshawar

No. \_\_\_\_\_ /EF,

Copy of above is forwarded:-

1. Superintendent of Police, HQrs: Elite Force, Peshawar.
2. DSP Elite Force D.I.Khan Region.
3. OASI/SRC, Elite Force, Khyber Pakhtunkhwa, Peshawar.
4. FMC, Elite Force alongwith complete departmental enquiry file: Bncl: (48).  
Ex-Constable Shafi Ullah No.1429, through Reader DSP Elite Force D.I.Khan.

*[Signature]*  
(ASIF IQBAL MOHMAD) PSP  
Deputy Comandant  
Elite Force Khyber Pakhtunkhwa Peshawar

*[Signature]*

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Better Copy

Office of the addl:IGP

Elite Force Khyber Pakhtunkhwa Peshawar

No.9265-70/EF

Dated.08-09-2022

ORDER

This is departmental appeal submitted by ExConstable Shafi Ullah No 1429against the punishment of dismissal from service awarded to him by deputy Commandant Elite Force vice order No. 6578-85/FE dated 30-06-2022 as he was charged case FIR No. 76 dated 01-04-2022 U/S 302-324/34 PPC PS Gul Imam District Tank and also remained absent from lawful duty without any leave or prior permission from the competent authority w.e from 31-03-2022 from the date of absence.

Hence the competent authority on the pensile filed his appeal on the grounds of times himation w.e. time barred:

sd

(MUHAMMAD WISAL FAKHAR SULTAN)PSP

Addl: inspector General of police

Elite force Khyber Pakhtunkhwa Peshawar

No \_\_\_\_\_ / \_\_\_\_\_

Copy of above forwarded:-

1. Superintendent of police HQrs: Elite force Peshawar.
2. DSP Elite force D.I.Khan Region.
3. OASI/SRC, Elite force, Khyber Pakhtunkhwa. Peshawar.
4. FMC, Elite force alongwith complete departmental enquiryfile Encl: 48.
5. Ex Constable Shafi Ullah No. 1492. Through Reader DSP Elite force DIKhan.

ASIF IQBAL MOHAMAND PSP

Deputy Commandant

Elite force Khyber Pakhtunkhwa Peshawar

W. A. S. I.

## ۴۳ - بخدمت بنابر انکار جزل آف پولیس خبر پختو نخواه پشاور

Ann.

**D/F** " اولیا رائے پتو منشوی حکم نمبر 5607/E.F. 5 مارچ 2022/07/06 بارہ شدہ ایجاد کا لائٹنگ  
ایڈ فوری خبر پختو نخواه پشاور جس کا بعید ہے مگر ایک ایڈشن کو Major Penalty یعنی کی  
مزاتجویز کی وجہ

بنابر عالی اپیلانٹ ایڈشن سب دلیل برداشت میں۔

۱۔ یہ کہ اپیلانٹ مورث ۱۱/۰۱/۲۰۱۱ کو ایڈری اسٹریٹ اسٹریٹ میں بھری ہوا اور بعد ازاں افسران بالا کے حکم کے مطابق پوری ایجادی اور جانشائی کیا گئی۔ پرانی میں سر انجام دیا گیا۔ اس دوران اپیلانٹ میں اسٹرکٹ پولیس اور ایڈشن فورس میں اپنی خدمات سر انجام دیا گی اور افسران بالا شکایت کا کوئی موقع نہیں دیا۔ اس نسبت مائل کہ برکر ریکارڈ وارث ہے۔

۲۔ یہ کہ اپیلانٹ ایڈشن نورنر (ٹاک) میں اپنی خدمات سر انجام دیے رہا تھا کہ اس دوران اپیلانٹ کو FIR نمبر 76 مورث ۱۱/۰۴/۲۰۲۲ (از مرد نفات PPC 302,324,34) ٹانک میں بد نجی طور پر کامرو دیا گیا۔ درحقیقت، اپیلانٹ کے الدور ہناف اشیاء میں کامیابی ایڈشن میں بکریاں پرانے پر تازہ ہو جاؤ اور اسیں جان کا بینا جاں بحق دیکریا اور ایک باری مذکورہ میں ایڈشن کے نامہ میں ۲۰۰۰ روپے کے نامہ کے ماتحت نامزد کر دیا تاکہ اس اپیلانٹ کی ملازمت دیا جائے تاکہ اپیلانٹ کو دفعہ نہیں تھا۔

۳۔ یہ کہ بعد مقدمہ مذکورہ بالا کی نسبت عدالت بنابر ایڈشن ٹانک میں ٹرائل شروع ہوا اور بعد ازاں ٹرائل میں فریقین ناگزی ہوئیں اور اسی نامہ ہو گیا اور کہ اپیلانٹ برہنست اشیاء نامہ تقدیم بالا سے برداشت حکم مورث ۱۱/۱۰/۲۰۲۲ برقرار رکھا گیا۔

۴۔ یہ کہ اس مسئلہ مقدمہ میں بالکل بے اثرا ہے اور اسے عدالت میں برکری ہو چکا ہے۔

۵۔ یہ کہ جناب اپنی کلامت ایڈشن فورس خبر پختو نخواه پشاور کی پوسٹ میں حکم نمبر 5607/E.F. 07/06/2022 جاری ہوا ہے اور اس مسئلہ کے خلاف Major Penalty یعنی کی مزاتجویز کیا گئی ہے جس کو منسوخ نہ رکھا مطلوب ہے لیکن لیکن لیکن مجبوری لفڑ سے۔

۶۔ یہ کہ اپیلانٹ نے ہمیشہ جانشائی کے ماتحت اپنے فرائض میں سر انجام دیجے ہیں کیونکہ کسی غیر قانونی سرکری ملوث نہیں رہا ہے بلکہ مقدمہ مذکورہ بالا میں مسئلہ کو بد نجی طور پر نامزد کیا گیا ہے تاہم تازہ صد کی نسبت

شکر اللہ

راشتی نامہ ہو چکا ہے اور سائل برئی بھی ہو چکا ہے اس لئے تین حکم نمبر 5607/EF مورخہ 07/06/2022 کو  
منسوخ فرما دیتیں قریں انصاف ہے۔

۷۔ یہ کہ سن سائل انہائی غریب خاندان کا چشم و چہارشی ہے۔ والدین اور بیوی اور قمیں چھوٹی بیجوں کی کنالٹ  
سائل کے کندھوں پر ہے اور سن اپیلاش کی ملازمت اسی واحد ذریعہ معاش ہے اس لئے بھی حکم نمبر 5607/EF  
مورخہ 07/06/2022 کو منسوخ فرما دیتیں انصاف ہے۔

۸۔ یہ کہ آپ جناب کو اس نسبت و سبق ترا انتیارات شامل ہیں۔

لہذا استدعا ہے کہ اپیلاش ہذا منظیر فرماتے ہوئے حکم نمبر 5607/EF مورخہ 07/06/2022 کو منسوخ  
فرما کر سائل کی دادری فرمائی جائے۔

مورخہ 04/05/2023

شفیق اللہ کائن شبیل ایلیٹ فورس ٹاکٹ بلڈ نمبر 1429 بااثون 101

موباکل نمبر 0344-7540740

شفیق اللہ

شفیق اللہ



- 45 -

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule 1975 (amended 2014) submitted Ex-FC Staff Ullah No. 1649. The petitioner was from service by Dy. Commandant Elite Force vide order Endst: No. 6578-85/EF, dated 30.06.2022 on the allegations that he was charged in case PIR No. 76 (b) 302/324/34 PPC PS Gula Imam Datt Tank. He also remained absent w.e.f 31.03.2022. He was acquitted by Addl: Session Judge-I Tank, on compromise basis. Addl. IG Elite Force filed his appeal on 08.09.2022 vide order Endst: No. 9265-70/EF, dated 08.09.2022.

Meeting of Appellate Board was held on 17.08.2023 wherein petitioner was heard in person. Petitioner contended that he was not involved in the incident & absented himself due to fear.

Perusal of enquiry papers reveals that the allegations leveled against the appellant have been proved. During hearing, appellant failed to advance any plausible explanation in rebuttal of the charges. The acquittal from the court on compromise basis does not absolve the Appellant from the liability. He also absented himself for more than three months from his lawful duty without any prior permission. The Board unanimously decided that he is not fit for service; therefore, his revision petition is hereby rejected.

Sd/-

AWAL KHAN, PSP

Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/2203-05/23, dated Peshawar, the 22-08-2023.

Copy of the above is forwarded to the:

1. Addl: IG Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commandant Elite Force, Service Record and One Enquiry File (106 pages) of the above named Ex-FC received vide your office Memo: No. 10309/EF, dated 29.09.2022 is returned herewith for your office record.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.

(DR. ZAFAR UL HAQ) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

*Waqas*

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## CHARGE SHEET

1. Asif Iqbal Mohmand, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you Constable Shah Ullah No. 1429, Platoon 100, 101 of Elite Force as follows:

As per information report of Acting DSP Elite Force D.I.Jhan Region vide No. 110/HP, dated 04.04.2022, you are charged In case FIR No. 76, dated 01.04.2022 at 102/24/24 PPC Police Station Gul Iman District Tank and also remained absent from lawful duty without any leave or prior permission from the Competent authority w.e.from 31.03.2022 till to date. Being a member of discipline force, your this act amounts to gross misconduct on your part.

2. By reason of the above, you appear to be guilty of misconduct under the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.

3. You are therefore, directed to submit your defense within Seven days of the receipt of this Charge Sheet to the Enquiry Officer.

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

5. You are directed to intimate whether you desire to be heard in person.

6. A statement of allegation is enclosed.

(ASIF IQBAL MOHMAND) PSP

Deputy Commandant  
Elite Force Khyber Pakhtunkhwa  
Peshawar

W.M.A.I.

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### SUMMARY OF ALLEGATIONS

1. Asif Iqbal Mohmand, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, am of the opinion that Constable Shafi Ullah No. 1429, Platoon No. 101 of Elite Force has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Khyber Pakhtunkhwa Police Rules, 1975 (amendment 2014).

### SUMMARY OF ALLEGATIONS

As per information report of Acting DSP Elite Force D.I.Khan Region vide No. 210/EF, dated 04.04.2022, he is charged in case FIR No. 76, dated 01.04.2022, U/S 302/324/34 PPC Police Station Gul Imam District Tank and also remained absent from lawful duty without any leave or prior permission from the Competent authority, w.e.f. from 31.03.2022 till to date.

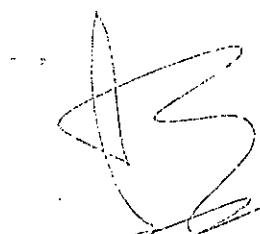
Being a member of discipline force, his this act amounts to gross misconduct on his part.

For the purpose of scrutinizing an enquiry is conducted of the said accused.

2. With reference to the above allegations, Mr. Masood Khan Acting DSP Elite Force D.I.Khan Region is appointed as Enquiry Officer.

3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within (25 days) after the receipt of this order.

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

  
(ASIF IQBAL MOHMAND) PSP  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa  
Peshawar

No. 2523-78 /EF, dated Peshawar the 05/04/2022.

Copy of the above is forwarded to the:-

- ✓ 1. Acting Deputy Superintendent of Police, Elite Force D.I.Khan Region.
2. Accountant, Elite Force Khyber Pakhtunkhwa Peshawar to stopped his pay.
3. Reader to Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar.
4. SRC/FMC, Elite Force Khyber Pakhtunkhwa Peshawar.
5. FC Shafi Ullah No. 1429, of Elite through reader A/DSP Elite D.I.Khan.

Dy. M. 33-E-DIK  
13-04-22

W/obj

FINAL SHOW CAUSE NOTICE

I, Asif Iqbal Mohmand, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority under Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) do hereby serve you Constable Shafi Ullah No. 1429, (Platoon No. 101) of Elite Force in following:

You are charged in case FIR No. 76, dated 01.04.2022 U/S 302/324/34 PPC Police Station Gol Imam District Tank and also remained absent from lawful duty without any leave or prior permission from the Competent authority w.e.f. from 31.03.2022 till to date, as per information report of Acting DSP Elite Force D.I.Khan Region vide No. 210/EF, dated 04.04.2022. Being a member of discipline force, you're this act amounts to gross misconduct on your part.

That consequent upon the completion of enquiry conducted against you by Mr. Masood Khan Acting DSP Elite Force D.I.Khan but you failed to appear before the Enquiry Officer nor submitted any reply of Charge Sheet.

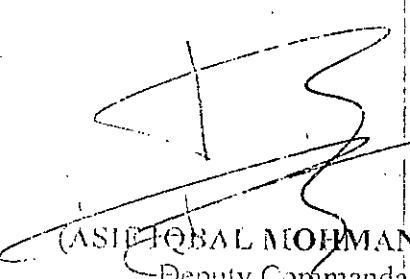
Ongoing through the finding and recommendation of the enquiry officer, the material available on record, I am satisfied that you have committed the omission/commission specified in Police Rules and charges leveled against you have been established beyond any doubt.

As a result therefore, I, Asif Iqbal Mohmand, Deputy Commandant Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority have tentatively decided to impose major penalty upon you, under Police Rules of the said ordinance.

You are therefore, directed to show cause as to why the aforesaid penalty should not be imposed upon you.

If no reply to this show cause notice is received within seven days of its delivery, in the normal course of circumstances, it shall be presumed that you have no defense to put and in that case an ex-parte action shall be taken against you.

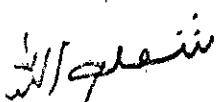
A copy of the finding of the Enquiry Officer is enclosed.



(ASIF IQBAL MOHAMMAD)PSI  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa  
Peshawar

No. 5107-EF, dated Peshawar the  
FC Shafi Ullah No. 1429 of Elite Force through reader A/DSP Elite D.I.Khan.

14/04/2022



لـك

تہمت

کورٹ

بعد ایالت جناب سرمهں نے بیوی کا عہد ورنے کے ذمہ اسٹائل خان

مختصر اپنائندہ

شیخ زیده بام انسپکتوریتی اف بولسون روزه

Chittagong

دعويٰ یاجرم

باعث تحریر آنکه

**مقدمة مختصرة باللغتين الفرنسية والإنجليزية**

لہذا اوناگالت نامہ کی تصدیق ہے۔ بتا کہ سندر بھٹے

2013 09 08 SAT

ضمونی و کا لست نامہ سن لے گے۔ اور اچھی طرح سمجھ لے گے اور منظور ہے۔

العنوان \_\_\_\_\_ العنوان \_\_\_\_\_ العنوان \_\_\_\_\_ العنوان \_\_\_\_\_

أَيْلَكْ ... - الْمُجَاهِد

Attested

Accepted  
in library  
envelope

Wij gie u

034475^4.074